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SAN FRANCISCO COUNTY
SUPERIOR COURT
2014 SEP 29 PM 2:24
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17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SAN FRANCISCO - UNLIMITED CIVIL JURISDICTION

CGC 14-541895

19 MARK MOORBERG,

20 Plaintiff,

21 v.

22 GIANT INTERNATIONAL (USA) LTD.;
23 TARGET CORPORATION; and DOES 1
24 -100, inclusive,

25 Defendants.

Case No. _____

26 **COMPLAINT FOR CIVIL PENALTIES
27 AND INJUNCTIVE RELIEF**

(Health & Safety Code § 25249.6, *et seq.*)

28 **NATURE OF THE ACTION**

1. This Complaint is a representative action brought by plaintiff MARK MOORBERG ("PLAINTIFF") in the public interest of the citizens of the State of California to enforce the People's right to be informed of the presence of Di(2-ethylhexyl)phthalate ("DEHP"), a toxic chemical found in cases for electronics with vinyl/PVC handles sold in California. DEHP is a toxic chemical used to treat vinyl/PVC, which is used in a variety of products.

1 2. By this Complaint, PLAINTIFF seeks to remedy Defendants continuing failures
2 to warn California citizens about the risk of exposure to DEHP present in and on cases for
3 electronics with vinyl/PVC handles manufactured, distributed, and offered for sale or use to
4 consumers throughout the State of California.

5 3. Detectable levels of DEHP are commonly found in and on cases for electronics
6 with vinyl/PVC handles that Defendants manufacture, distribute, and offer for sale to
7 consumers throughout the State of California. Individuals in California, including infants and
8 children, are exposed to DEHP in the products through various routes of exposure: (i) through
9 inhalation when DEHP is released from cases for electronics with vinyl/PVC handles; (ii)
10 through dermal exposure when DEHP from cases for electronics with vinyl/PVC handles
11 accumulate in ambient particles that are subsequently touched by such individuals; and (iii)
12 through ingestion when such particles are brought into contact with the mouth.

13 4. Under the Safe Drinking Water and Toxic Enforcement Act of 1986, codified at
14 Health and Safety Code section 25249.6 *et seq.* ("Proposition 65"), "[n]o person in the course
15 of doing business shall knowingly and intentionally expose any individual to a chemical known
16 to the state to cause cancer or reproductive toxicity without first giving clear and reasonable
17 warning to such individual" Health & Safety Code § 25249.6.

18 5. Pursuant to Proposition 65, on October 24, 2003, California identified and listed
19 DEHP as a chemical known to cause cancer. DEHP became subject to the "clear and
20 reasonable warning" requirements of the Act one year later on October 24, 2004. Cal. Code
21 Regs., Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b).

22 6. DEHP is hereinafter referred to as the "LISTED CHEMICAL."

23 7. Defendant GIANT INTERNATIONAL (USA) LTD. ("GIANT") manufactures,
24 distributes, imports, sells and/or offers for sale in California cases for electronics with
25 vinyl/PVC handles containing DEHP without a warning including, but not limited to, Motorola
26 Talkabout 2-Way Radios, *MR350RPP*, *GU7174A*, *UPC #8 43677 00190 7*.

27 8. Defendant TARGET CORPORATION ("TARGET") manufactures, distributes,
28 imports, sells and/or offers for sale in California cases for electronics with vinyl/PVC handles

1 containing DEHP without a warning including, but not limited to, Motorola Talkabout 2-Way
2 Radios, *MR350RPP*, *GU7174A*, *UPC #8 43677 00190 7*.

3 9. All products containing the LISTED CHEMICALS as listed in paragraph 7
4 through 8 above, shall hereinafter be referred to as the "PRODUCTS."

5 10. Although GIANT and TARGET (collectively "DEFENDANTS") expose infants,
6 children, and other people to the LISTED CHEMICALS in the PRODUCTS, DEFENDANTS
7 provide no warnings about the carcinogenic hazards associated with exposure to the LISTED
8 CHEMICALS. DEFENDANTS' failures to warn consumers and other individuals and
9 workers (specifically those not subject to California's Occupational Health Act, Labor Code
10 section 6300 et seq. or exempted under the out-of-state manufacturer rule) in the State of
11 California about their exposures to the LISTED CHEMICALS in conjunction with
12 DEFENDANTS' sales of the PRODUCTS, is a violation of Proposition 65, and subjects
13 DEFENDANTS to enjoinder of such conduct as well as civil penalties for each violation.
14 Health & Safety Code § 25249.7(a) & (b)(1).

15 11. As a result of DEFENDANTS' violations of Proposition 65, PLAINTIFF seeks
16 preliminary and permanent injunctive relief to compel DEFENDANTS to provide purchasers
17 or users of the PRODUCTS with the required warning regarding the health hazards of the
18 LISTED CHEMICAL in the PRODUCTS. Health & Safety Code § 25249.7(a).

19 12. Pursuant to Health and Safety Code section 25249.7(b), PLAINTIFF also seeks
20 civil penalties against DEFENDANTS for their violations of Proposition 65.

21
22 **PARTIES**

23 13. Plaintiff MARK MOORBERG is a citizen of the State of California who is
24 dedicated to protecting the health of California citizens through the elimination or reduction of
25 toxic exposures from consumer products; and he brings this action in the public interest
26 pursuant to Health and Safety Code section 25249.7(d).

27 14. Defendant GIANT INTERNATIONAL (USA) LTD. is a person in the course of
28 doing business within the meaning of Health and Safety Code sections 25249.6 and 25249.11.

1 15. GIANT manufactures, imports, distributes, sells, and/or offers the PRODUCTS
2 for sale or use in the State of California, or implies by its conduct that it manufactures, imports,
3 distributes, sells, and/or offers the PRODUCTS for sale or use in the State of California.

4 16. Defendant TARGET CORPORATION is a person in the course of doing
5 business within the meaning of Health and Safety Code sections 25249.6 and 25249.11.

6 17. TARGET manufactures, imports, distributes, sells, and/or offers the PRODUCTS
7 for sale or use in the State of California, or implies by its conduct that it manufactures, imports,
8 distributes, sells, and/or offers the PRODUCTS for sale or use in the State of California.

9 18. Defendants DOES 1 -100 are each persons in the course of doing business within
10 the meaning of Health and Safety Code section 25249.11(b), which manufacture, distribute,
11 sell, and/or offer the PRODUCTS for sale in the State of California. At this time, the true
12 names and capacities of defendants DOES 1 through 100, inclusive, are unknown to
13 PLAINTIFF, who, therefore, sues said defendants by their fictitious names pursuant to Code of
14 Civil Procedure section 474. PLAINTIFF is informed and believes, and on that basis alleges,
15 that each of the fictitiously named defendants is responsible for the acts and occurrences
16 alleged herein. When ascertained, their true names and capacities shall be reflected in an
17 amended complaint.

18 19. GIANT, TARGET and Defendants DOES 1 -100 are collectively referred to
19 herein as "DEFENDANTS."

20 VENUE AND JURISDICTION

21 20. Venue is proper in San Francisco Superior Court, pursuant to Code of Civil
22 Procedure sections 393, 395, and 395.5, because this Court is a court of competent jurisdiction,
23 because PLAINTIFF seeks civil penalties against DEFENDANTS, because one or more
24 instances of wrongful conduct occurred, and continue to occur, in the City and County of San
25 Francisco, and/or because DEFENDANTS conducted, and continue to conduct, business in this
26 county with respect to the PRODUCTS.

27 21. The California Superior Court has jurisdiction over this action pursuant to
28 California Constitution Article VI, section 10, which grants the Superior Court "original

1 jurisdiction in all causes except those given by statute to other trial courts.” The statute under
2 which this action is brought does not specify any other basis of subject matter jurisdiction.

3 22. The California Superior Court has jurisdiction over DEFENDANTS based on
4 PLAINTIFF’S information and good faith belief that each of the DEFENDANTS is a person,
5 firm, corporation, or association that is a citizen of the State of California, has sufficient
6 minimum contacts in the State of California, and/or otherwise purposefully avails itself of the
7 California market. DEFENDANTS’ purposeful availment of California as a marketplace for
8 the PRODUCTS renders the exercise of personal jurisdiction by California courts over
9 DEFENDANTS consistent with traditional notions of fair play and substantial justice.

10 **FIRST CAUSE OF ACTION**

11 **(Violation of Proposition 65 - Against All Defendants)**

12 23. PLAINTIFF re-alleges and incorporates by reference, as if fully set forth herein,
13 Paragraphs 1 through 22, inclusive.

14 24. In enacting Proposition 65, in the preamble to the Safe Drinking Water and
15 Toxic Enforcement Act of 1986, the People of California expressly declared their right “[t]o be
16 informed about exposures to chemicals that cause cancer, birth defects, or other reproductive
17 harm.”

18 25. Proposition 65 states, “[n]o person in the course of doing business shall
19 knowingly and intentionally expose any individual to a chemical known to the state to cause
20 cancer or reproductive toxicity without first giving clear and reasonable warning to such
21 individual” Health & Safety Code § 25249.6.

22 26. On May 21, 2014, PLAINTIFF’S sixty-day notice of violation, together with the
23 requisite certificate of merit, was provided to GIANT and TARGET and certain public
24 enforcement agencies stating that, as a result of DEFENDANTS’ sales of the PRODUCTS
25 containing DEHP, purchasers and users in the State of California were being exposed to DEHP
26 resulting from their reasonably foreseeable use of the PRODUCTS, without the individual
27 purchasers and users first having been provided with a “clear and reasonable warning”
28

1 regarding such toxic exposures, as required by Proposition 65. A true and correct copy of the
2 sixty-day notice is attached hereto as Exhibit A.

3 27. DEFENDANTS have engaged in the manufacture, importation, distribution, sale,
4 and offering of the PRODUCTS for sale or use in violation of Health and Safety Code section
5 25249.6, and DEFENDANTS' violations have continued to occur beyond their receipt of
6 PLAINTIFF'S sixty-day notice of violation. As such, DEFENDANTS' violations are ongoing
7 and continuous in nature, and will continue to occur in the future.

8 28. After receiving PLAINTIFF'S sixty-day notice of violation, the appropriate
9 public enforcement agencies have failed to commence and diligently prosecute a cause of
10 action against DEFENDANTS under Proposition 65.

11 29. The PRODUCTS manufactured, imported, distributed, sold, and offered for sale
12 or use in California by DEFENDANTS contain the LISTED CHEMICAL such that they
13 require a "clear and reasonable" warning under Proposition 65.

14 30. DEFENDANTS knew or should have known that the PRODUCTS they
15 manufacture, import, distribute, sell, and offer for sale or use in California contain the LISTED
16 CHEMICAL.

17 31. The LISTED CHEMICAL is present in or on the PRODUCTS in such a way as
18 to expose individuals to the LISTED CHEMICAL through dermal contact, ingestion, and/or
19 inhalation during reasonably foreseeable use of the PRODUCTS including through workplace
20 exposure to the PRODUCTS.

21 32. The normal and reasonably foreseeable uses of the PRODUCTS have caused,
22 and continue to cause, consumer exposures to the LISTED CHEMICAL; as such exposures are
23 defined by the California Code of Regulations Title 27, section 25602(b).

24 33. DEFENDANTS had knowledge that the normal and reasonably foreseeable uses
25 of the PRODUCTS expose individuals to the LISTED CHEMICAL through dermal contact,
26 ingestion, and/or inhalation.

27 34. DEFENDANTS intended that such exposures to the LISTED CHEMICAL from
28 the reasonably foreseeable uses of the PRODUCTS would occur by DEFENDANTS'

1 deliberate, non-accidental participation in the manufacture, importation, distribution, sale, and
2 offering of the PRODUCTS for sale or use to individuals in the State of California.

3 35. DEFENDANTS failed to provide a "clear and reasonable warning" to those
4 consumers and other individuals in the State of California who were or who would become
5 exposed to the LISTED CHEMICAL through dermal contact, ingestion, and/or inhalation
6 during the reasonably foreseeable uses of the PRODUCTS including through workplace
7 exposure to the PRODUCTS.

8 36. Contrary to the express policy and statutory prohibition of Proposition 65
9 enacted directly by California voters, individuals exposed to the LISTED CHEMICAL through
10 dermal contact, ingestion, and/or inhalation resulting from the reasonably foreseeable uses of
11 the PRODUCTS including through workplace exposure to the PRODUCTS sold by
12 DEFENDANTS without a "clear and reasonable warning," have suffered, and continue to
13 suffer, irreparable harm for which they have no plain, speedy, or adequate remedy at law.

14 37. Pursuant to Health and Safety Code section 25249.7(b), as a consequence of the
15 above-described acts, DEFENDANTS are liable for a maximum civil penalty of \$2,500 per
16 day for each violation.

17 38. As a consequence of the above-described acts, Health and Safety Code
18 section 25249.7(a) also specifically authorizes the Court to grant injunctive relief against
19 DEFENDANTS.

20 **PRAYER FOR RELIEF**

21 Wherefore, plaintiffs pray for judgment against DEFENDANTS, and each of them, as
22 follows:

23 1. That the Court, pursuant to Health and Safety Code section 25249.7(b), assess
24 civil penalties against DEFENDANTS in the amount of \$2,500 per day for each violation;

25 2. That the Court, pursuant to Health and Safety Code section 25249.7(a),
26 preliminarily and permanently enjoin DEFENDANTS from manufacturing, distributing, or
27 offering the PRODUCTS for sale or use in California without first providing a "clear and
28

1 reasonable warning” as defined by the California Code of Regulations title 27, section 25601 *et*
2 *seq.*, as to the harms associated with exposures to the LISTED CHEMICAL;

3 3. That the Court, pursuant to Health and Safety Code section 25249.7(a), issue
4 preliminary and permanent injunctions mandating that DEFENDANTS recall all PRODUCTS
5 currently in the chain of commerce in California without a “clear and reasonable warning” as
6 defined by California Code of Regulations title 27, section 25601 *et seq.*,

7 4. That the Court grant PLAINTIFF his reasonable attorneys' fees and costs of suit;
8 and

9 5. That the Court grant such other and further relief as may be just and proper.

10
11 Dated: September 29, 2014

Respectfully Submitted,

12 MOSCONE EMBLIDGE SATER & OTIS LLP

13
14 By: 

Rachel J. Sater

15 Attorneys for Plaintiff MARK MOORBERG

Exhibit A

60-DAY NOTICE OF VIOLATION

SENT IN COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE § 25249.7(d)

DATE: May 21, 2014

TO: Mark Loong, Chief Executive Officer – Giant International (USA), Ltd.
Gregg W. Steinhafel, Chief Executive Officer – Target Corporation
California Attorney General's Office;
District Attorney's Office for 58 Counties; and
City Attorneys for San Francisco, San Diego, San Jose, Sacramento and Los Angeles

FROM: Mark Moorberg

I. INTRODUCTION

My name is Mark Moorberg. I am a citizen of the State of California acting in the interest of the general public. I seek to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve human health by reducing hazardous substances contained in such items. This Notice is provided to the public agencies listed above-pursuant to California Health & Safety Code § 25249.6 *et seq.* ("Proposition 65"). As noted above, notice is also being provided to the alleged violators, Giant International (USA), Ltd. and Target Corporation (the "Violators"). The violations covered by this Notice consist of the product exposures, routes of exposure, and type of harm potentially resulting from exposure to the toxic chemical ("listed chemical") identified below, as follows:

Product Exposure: See Section VII. Exhibit A
Listed Chemical: Di(2-ethylhexyl)phthalate ("DEHP")
Routes of Exposure: Ingestion, Dermal
Types of Harm: Birth Defects and Other Reproductive Harm

II. NATURE OF ALLEGED VIOLATION (PRODUCT EXPOSURE)

The specific type of product that is causing consumer and occupational exposures in violation of Proposition 65, and that is covered by this Notice, is listed under "Product Category/Type" in Exhibit A in Section VII below. All products within the category covered by this Notice shall be referred to hereinafter as the "products." Exposures to the listed chemical from the use of the products have been occurring without the clear and reasonable warning required by Proposition 65, dating as far back as May 21, 2011. Without proper warnings regarding the toxic effects of exposures to the listed chemical resulting from contact with the products, California citizens lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the listed chemical from the reasonably foreseeable use of the products.

California citizens, through the act of buying, acquiring or utilizing the products, are exposed to the listed chemical. Women of childbearing age ingest the listed chemical when they, among other activities, touch the products and transfer the listed chemical from the products to their mouths through hand-to-mouth activities that may continue to occur for a significant period after contact with the products stops. Women of childbearing age are exposed to the listed chemical through direct dermal contact when they, among other activities, handle, touch or otherwise use the products.

III. CONTACT INFORMATION

Please direct all questions concerning this notice to me through my counsel's office at the following address:

Mark Moorberg
c/o Josh Voorhees
The Chanler Group
Parker Plaza
2560 Ninth Street, Suite 214
Berkeley, CA 94710
Telephone: (510) 848-8880

IV. PROPOSITION 65 INFORMATION

For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment's ("OEHHA") Proposition 65 Implementation Office at (916) 445-6900. For the Violators' reference, I have attached a copy of "Proposition 65: A Summary" which has been prepared by OEHHA.

V. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against the alleged Violators unless such Violators enter into a binding written agreement to: (1) recall products already sold or undertake best efforts to ensure that the requisite health hazard warnings are provided to those who have received such products; (2) provide clear and reasonable warnings for products sold in the future or reformulate such products to eliminate the DEHP exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health & Safety Code § 25249.7(b). If the alleged Violators are interested in resolving this dispute without resorting to time-consuming and expensive litigation, please feel free to contact my counsel identified in Section III above. It should be noted that neither my counsel nor I can: (1) finalize any settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any district or city attorney who received this Notice. Therefore, while reaching an agreement with me will resolve my claims, such agreement may not satisfy the public prosecutors.

VI. ADDITIONAL NOTICE INFORMATION

Identified below is a specific example of a product recently purchased and witnessed as being available for purchase or use in California that is within the category or type of offending product covered by this Notice. Based on publicly available information, the retailers, distributors and/or manufacturers of the example within the category or type of product are also provided below. I believe and allege that the sale of the offending products also has occurred without the requisite Proposition 65 "clear and reasonable warning" at one or more locations and/or via other means including, but not limited to, transactions made over-the-counter, business-to-business, through the internet and/or via a catalog by the Violators and other retailers and distributors of the manufacturer.

<i>Product*</i>	<i>Retailer(s)</i>	<i>Manufacturer(s)/Distributor(s)</i>
Motorola Talkabout 2-Way Radios, MR350RPP, GU7174A, UPC #8 43677 00190 7	Target Corporation Sacramento County, Northern California	Giant International (USA), Ltd.

VII. EXHIBIT A

<i>Product Category/Type</i>	<i>Such As*</i>	<i>Toxins</i>
Cases for Electronics with Vinyl/PVC Handles	Motorola Talkabout 2-Way Radios, MR350RPP, GU7174A, UPC #8 43677 00190 7	Di(2-ethylhexyl)phthalate

*The specifically identified examples of the types of products that are subject to this Notice are for the recipients' benefit to assist in their investigation of, among other things, the magnitude of potential exposures to the listed chemical from other items within the product categories/types listed in Exhibit A. It is important to note that these examples are not meant to be an exhaustive or comprehensive identification of each specific offending product of the types listed under "Product Category/Type" in Exhibit A. Further, it is this citizen's position that the alleged Violators are obligated to continue to conduct in good faith an investigation into other specific products within the types or categories described above that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipients' custody or control) during the relevant period so as to ensure that the requisite toxic warnings were and are provided to California citizens prior to purchase.

PROOF OF SERVICE

I, the undersigned, declare under penalty of perjury:

I am over the age of 18 years, and not a party to the within action; my business address is Parker Plaza, 2560 Ninth Street, Suite 214, Berkeley, CA 94710.

On May 21, 2014, I served the following documents:

**60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH
HEALTH & SAFETY CODE § 25249.7(d);**

PROPOSITION 65: A SUMMARY;

CERTIFICATE OF MERIT; AND

**CERTIFICATE OF MERIT ATTACHMENTS (SERVED ONLY ON THE
ATTORNEY GENERAL)**

on the entities listed below via First Class Certified Mail through the United States Postal Service by placing a true and correct copy in a sealed envelope, addressed to the entities listed below and providing each envelope to a United States Postal Service Representative:

Mark Loong, Chief Executive Officer
Giant International (USA), Ltd.
3495 Piedmont Road NE, Suite 920
Building 10
Atlanta, GA 30305

Gregg W. Steinhafel, Chief Executive Officer
Target Corporation
1000 Nicollet Mall
Minneapolis, MN 55403

as well as by providing copies of the above documents electronically uploaded to the public enforcers according to directions from their respective offices, and/or by placing a true and correct copy in a sealed envelope, addressed to each party listed below, and served as follows:

<i>Electronically Uploaded to the Attorney General's website:</i>	The Attorney General of the State of California;
<i>By placing each envelope in a United States Postal Service mailbox, postage prepaid:</i>	The District Attorney for Each of the 58 counties in California; and The City Attorney for Los Angeles, San Diego, San Jose, San Francisco and Sacramento

A list of addresses for each of these recipients is attached.

Executed on May 21, 2014, at Berkeley, California.



Caroline Pak

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Clifford A. Chanler, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the parties identified in the notice have violated Health and Safety Code § 25249.6 by failing to provide clear and reasonable warnings;
2. I am the attorney for the noticing party;
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the *alleged* exposure to the listed chemical that is the subject of this action;
4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged Violators will be able to establish any of the affirmative defenses set forth in the statute;
5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including information identified in Health and Safety Code § 25249.7(h)(2) (i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons).

Dated: May 21, 2014



Clifford A. Chanler

SERVICE LIST

The Honorable Nancy O'Malley
Alameda County District Attorney
1225 Fallon Street, Room 900
Oakland, CA 94612

The Honorable Terese Drabec
Alpine County District Attorney
270 Laramie Street, PO BOX 248
Markleeville, CA 95120

The Honorable Todd Riebe
Amador County District Attorney
708 Court Street
Jackson, CA 95842

The Honorable Michael Ramsey
Butte County District Attorney
25 County Center Drive
Oroville, CA 95965

The Honorable Barbara Yook
Calaveras County District Attorney
891 Mountain Ranch Road
San Andreas, CA 95249

The Honorable John R. Poynor
Colusa County District Attorney
348 Fifth Street
Colusa, CA 95632

The Honorable Mark Peterson
Contra Costa County District Attorney
900 Ward Street
Martinez, CA 94553

The Honorable Jon Alexander
Del Norte County District Attorney
861 H Street
Crescent City, CA 95531

The Honorable Vernon Pierson
El Dorado County District Attorney
515 Main Street
Placerville, CA 95367

The Honorable Elizabeth Egan
Fresno County District Attorney
2220 Tulare Street, #1000
Fresno, CA 93721

The Honorable Robert Maloney
Glenn County District Attorney
P.O. Box 430
Willows, CA 95968

The Honorable Paul Gallegos
Humboldt County District Attorney
825 5th Street
Eureka, CA 95501

The Honorable Gilbert Otero
Imperial County District Attorney
940 West Main Street, Suite 102
El Centro, CA 92243

The Honorable Arthur Maillet
Inyo County District Attorney
P.O. Drawer D
Independence, CA 93328

The Honorable Lisa Green
Kern County District Attorney
1215 Truxtun Avenue
Bakersfield, CA 93301

The Honorable Greg Strickland
Kings County District Attorney
1400 West Lacey Boulevard
Hanford, CA 93230

The Honorable Donald Anderson
Lake County District Attorney
255 North Forbes Street
Lakeport, CA 95453

The Honorable Robert Burns
Lassen County District Attorney
220 S. Lassen Street, Ste. B
Susanville, CA 96130

The Honorable Steve Cooley
Los Angeles County District Attorney
210 West Temple Street, Suite 18000
Los Angeles, CA 90012

The Honorable Michael Kalitz
Madras County District Attorney
209 West Yosemite Avenue
Madras, CA 93637

The Honorable Edward Berberian
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3501 Civic Center Drive, Room 130
San Rafael, CA 94903

The Honorable Robert Brown
Mariposa County District Attorney
5101 Jones Street, P.O. Box 730
Mariposa, CA 93338

The Honorable C. David Eyster
Mendocino County District Attorney
P.O. Box 1000
Ukiah, CA 95482

The Honorable Larry Morse II
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Merced, CA 95340

The Honorable Gary Woolverton
Modoc County District Attorney
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Alturas, CA 96101

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Bridgeport, CA 95317

The Honorable Dean Filippo
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Salinas, CA 93902

The Honorable Gary Lieberstein
Napa County District Attorney
P.O. Box 720
Napa, CA 94558

The Honorable Clifford Newell
Nevada County District Attorney
201 Commercial Street
Nevada City, CA 95959

The Honorable Tony Racksuckas
Orange County District Attorney
401 Civic Center Drive West
Santa Ana, CA 92701

The Honorable Ronald Owens
Placer County District Attorney
10810 Justice Center Drive, Suite 240
Roseville, CA 95678

The Honorable David Hollister
Plumas County District Attorney
520 Main Street, Room 404
Quincy, CA 95971

The Honorable Paul Zellerbach
Riverside County District Attorney
3960 Orange Street
Riverside, CA 92501

The Honorable Jan Scully
Sacramento County District Attorney
901 G Street
Sacramento, CA 95814

The Honorable Candice Hooper
San Benito County District Attorney
419 4th Street, Second Floor
Hollister, CA 95203

The Honorable Michael Ramos
San Bernardino County District Attorney
318 N. Mountain View Avenue
San Bernardino, CA 92415

The Honorable Bonnie Dumanis
San Diego County District Attorney
330 W. Broadway Street
San Diego, CA 92101

The Honorable George Gascon
San Francisco County District Attorney
850 Bryant Street, Room 322
San Francisco, CA 94103

The Honorable James W. Mett
San Joaquin County District Attorney
P.O. Box 990
Stockton, CA 95201

The Honorable Gerald Shea
San Luis Obispo County District Attorney
1035 Palm Street
San Luis Obispo, CA 93408

The Honorable Stephen Wagstaffe
San Mateo County District Attorney
400 County Center, Third Floor
Redwood City, CA 94063

The Honorable Joyce Dudley
Santa Barbara County District Attorney
1112 Santa Barbara Street
Santa Barbara, CA 93101

The Honorable Jeffrey Rosen
Santa Clara County District Attorney
70 West Hedding Street, West Wing
San Jose, CA 95110

The Honorable Bob Lee
Santa Cruz County District Attorney
701 Ocean Street, Room 200
Santa Cruz, CA 95060

The Honorable Stephen Carlton
Shasta County District Attorney
1355 West Street
Redding, CA 96001

The Honorable Lawrence Allen
Sierra County District Attorney
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Downsville, CA 95938

The Honorable James Kirk Andrus
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Yreka, CA 96097

The Honorable Donald A. du Bain
Solano County District Attorney
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Fairfield, CA 94533

The Honorable Jill Ravitch
Sonoma County District Attorney
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Santa Rosa, CA 95403

The Honorable Elgiti Fladager
Stanislaus County District Attorney
832 12th Street, Suite 300
Modesto, CA 95354

The Honorable Carl Adams
Sutter County District Attorney
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Yuba City, CA 95991

The Honorable Gregg Cohen
Tehama County District Attorney
444 Oak Street, Room L
Red Bluff, CA 96080

The Honorable Michael B. Harper
Trinity County District Attorney
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Weaverville, CA 96093

The Honorable Phillip Cline
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Visalia, CA 93291

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