

ENDORSED  
FILED  
ALAMEDA COUNTY

DEC 9 2014

CLERK OF THE SUPERIOR COURT  
By Louis Staley, Jr.

1 Christina M. Caro (CBN 250797)  
2 LAW OFFICE OF CHRISTINA M. CARO  
3 2506 Haste Street  
4 Berkeley, CA 94704  
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8 Attorneys for Plaintiff  
9 ENVIRONMENTAL RESEARCH CENTER, INC.

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF ALAMEDA

12 ENVIRONMENTAL RESEARCH CENTER, )  
13 INC., a non-profit California corporation, )

14 Plaintiff,

15 v.

16 BIOPLEX NUTRITION, INC., a Washington  
17 Corporation; BIOPLEX PURE NUTRITION,  
18 LLC, a Washington Limited Liability  
19 Company; CAMANO ISLAND  
20 MANAGEMENT, INC., a Washington  
21 Corporation; CAMANO ISLAND COFFEE  
22 ROASTERS, LLC, a Washington Limited  
23 Liability Company; FROZEN X-PLOSION,  
24 LLC, a Washington Limited Liability  
25 Company,

26 Defendants.

Case No. **RG14750840**

**COMPLAINT FOR INJUNCTIVE  
RELIEF AND CIVIL PENALTIES**

Health & Safety Code §25249.5, *et seq.*

Plaintiff ENVIRONMENTAL RESEARCH CENTER, INC. ("Plaintiff" or "ERC")

brings this action in the interests of the general public and, on information and belief, hereby

alleges:

**INTRODUCTION**

1. This action seeks to remedy the continuing failure of Defendants BIOPLEX  
NUTRITION, INC.; BIOPLEX PURE NUTRITION, LLC; CAMANO ISLAND  
MANAGEMENT, INC.; CAMANO ISLAND COFFEE ROASTERS, LLC; and FROZEN X-

COPY

FAXED

1 PLOSION, LLC (collectively, “Defendants”) to warn consumers in California that they are  
2 being exposed to lead, a substance known to the State of California to cause cancer, birth  
3 defects, and other reproductive harm.

4 2. Defendants BIOPLEX NUTRITION, INC.; BIOPLEX PURE NUTRITION, LLC;  
5 CAMANO ISLAND MANAGEMENT, INC. (collectively, “Bioplex Defendants”)  
6 manufacture, package, distribute, market, and/or sell in California certain products containing  
7 lead, including each of the following products (“BIOPLEX PRODUCTS”):

- 8 a. Bioplex Nutrition Inc. Whey In Weight Gainer Vanilla Cream;
- 9 b. Bioplex Nutrition Inc. Whey In Weight Gainer Chocolate.

10 3. Defendants FROZEN X-PLOSION, LLC; CAMANO ISLAND MANAGEMENT,  
11 INC.; and CAMANO ISLAND COFFEE ROASTERS, LLC (collectively, “Frozen X-Plosion  
12 Defendants”) manufacture, package, distribute, market, and/or sell in California certain  
13 products containing lead, including each of the following products (“FROZEN X-PLOSION  
14 PRODUCTS,” or collectively with the BIOPLEX PRODUCTS as the “PRODUCTS”):

- 15 a. FrozenXplosion Protein Generation Smoothie Chocolate;
- 16 b. FrozenXplosion Protein Generation Smoothie Acai Blue Berry;
- 17 c. Frozen X-plosion Base.

18 4. Lead and lead compounds (hereinafter, the “LISTED CHEMICAL”) is a substance  
19 known to the State<sup>1</sup> of California to cause cancer, birth defects, and other reproductive harm.

20 5. The use and/or handling of the PRODUCTS causes exposures to the LISTED  
21 CHEMICAL at levels requiring a “clear and reasonable warning” under California's Safe  
22 Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”)  
23 §25249.5, *et seq.* (also known as “Proposition 65”). Defendants have failed to provide the  
24 health hazard warnings required by Proposition 65.

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25  
26 <sup>1</sup> All statutory and regulatory references herein are to California law, unless otherwise specified.



1 otherwise intentionally availing themselves of the California market through the distribution  
2 and sale of the PRODUCTS in the State of California to render the exercise of jurisdiction over  
3 them by the California courts consistent with traditional notions of fair play and substantial  
4 justice.

5 11. Venue in this action is proper in the Alameda Superior Court because the  
6 Defendants have violated California law in the County of Alameda.

7 **PARTIES**

8 12. Plaintiff ERC is a non-profit corporation organized under California's Corporation  
9 Law. ERC is dedicated to, among other causes, reducing the use and misuse of hazardous and  
10 toxic substances, consumer protection, worker safety, and corporate responsibility.

11 13. ERC is a person within the meaning of H&S Code §25118 and brings this  
12 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

13 14. Defendant BIOPLEX NUTRITION, INC. is a corporation organized under  
14 Washington's Corporation Law and is a person doing business within the meaning of H&S  
15 Code §25249.11. BIOPLEX NUTRITION, INC. manufactures, packages, distributes, markets  
16 and/or sells the BIOPLEX PRODUCTS for sale or use in California and in Alameda County.

17 15. Defendant BIOPLEX PURE NUTRITION, LLC, is a Limited Liability Company  
18 ("LLC") organized under Washington's LLC laws and is a person doing business within the  
19 meaning of H&S Code §25249.11. BIOPLEX PURE NUTRITION, LLC manufactures,  
20 packages, distributes, markets and/or sells the BIOPLEX PRODUCTS for sale or use in  
21 California and in Alameda County.

22 16. Defendant CAMANO ISLAND MANAGEMENT, INC. is a corporation organized  
23 under Washington's Corporation Law and is a person doing business within the meaning of  
24 H&S Code §25249.11. CAMANO ISLAND MANAGEMENT, INC. manufactures, packages,  
25 distributes, markets and/or sells the BIOPLEX PRODUCTS and the FROZEN X-PLOSION  
26 PRODUCTS for sale or use in California and in Alameda County.

1 17. Defendant CAMANO ISLAND COFFEE ROASTERS, LLC is an LLC organized  
2 under Washington’s LLC laws and is a person doing business within the meaning of H&S  
3 Code §25249.11. CAMANO ISLAND COFFEE ROASTERS, LLC manufactures, packages,  
4 distributes, markets and/or sells the FROZEN X-PLOSION PRODUCTS for sale or use in  
5 California and in Alameda County.

6 18. Defendant FROZEN X-PLOSION, LLC is an LLC organized under Washington’s  
7 LLC laws and is a person doing business within the meaning of H&S Code §25249.11.  
8 FROZEN X-PLOSION, LLC manufactures, packages, distributes, markets and/or sells the  
9 FROZEN X-PLOSION PRODUCTS for sale or use in California and in Alameda County.

10 **STATUTORY BACKGROUND**

11 19. The People of the State of California have declared in Proposition 65 their right  
12 “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other  
13 reproductive harm.” (Section 1(b) of Initiative Measure, Proposition 65).

14 20. To effect this goal, Proposition 65 requires that individuals be provided with a  
15 “clear and reasonable warning” before being exposed to substances listed by the State of  
16 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent  
17 part:

18 No person in the course of doing business shall knowingly and intentionally  
19 expose any individual to a chemical known to the state to cause cancer or  
20 reproductive toxicity without first giving clear and reasonable warning to such  
21 individual....

22 21. “‘Knowingly’ refers only to knowledge of the fact that a discharge of, release of, or  
23 exposure to a chemical listed pursuant to Section 25249.8(a) of the Act is occurring. No  
24 knowledge that the discharge, release or exposure is unlawful is required.” 27 California Code  
25 of Regulations (“CCR”) §25102(n).

26 22. Proposition 65 provides that any person “violating or threatening to violate” the  
statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7). The  
phrase “threatening to violate” is defined to mean creating “a condition in which there is a

1 substantial likelihood that a violation will occur.” (H&S Code §25249.11(e)). Violators are  
2 liable for civil penalties of up to \$2,500 per day for each violation of the Act. (H&S Code  
3 §25249.7.)

4 **FACTUAL BACKGROUND**

5 23. On February 27, 1987, the State of California officially listed the chemical lead as a  
6 chemical known to cause reproductive toxicity. Lead became subject to the warning  
7 requirement one year later and was therefore subject to the “clear and reasonable” warning  
8 requirements of Proposition 65 beginning on February 27, 1988. 27 California Code of  
9 Regulations (“CCR”) §25000, *et seq.*; H&S Code §25249.5, *et seq.*. Due to the high toxicity  
10 of lead, the maximum allowable dose level for lead is 0.5 ug/day (micrograms a day) for  
11 reproductive toxicity. 27 CCR § 25805(b).

12 24. On October 1, 1992, the State of California officially listed the chemicals lead and  
13 lead compounds as chemicals known to cause cancer. Lead and lead compounds became  
14 subject to the warning requirement one year later and were therefore subject to the “clear and  
15 reasonable” warning requirements of Proposition 65 beginning on October 1, 1993. 27 CCR  
16 § 25102, *et seq.*; H&S Code §25249.6, *et seq.*. Due to the carcinogenicity of lead, the no  
17 significant risk level for lead is 15 ug/day (micrograms a day). 27 CCR § 25705(b)(1).

18 25. To test Defendants’ PRODUCTS for lead, Plaintiff hired a well-respected and  
19 accredited testing laboratory that designed the testing protocol used and approved by the  
20 California Attorney General years ago for testing heavy metals. The results of testing  
21 undertaken by Plaintiff of Defendants’ PRODUCTS show that the PRODUCTS tested were in  
22 violation of the 0.5 ug/day “safe harbor” daily dose limit set forth in Proposition 65’s  
23 regulations. Very significant is the fact that people are being exposed to lead through ingestion  
24 as opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of  
25 lead produces much higher exposure levels and health risks than does dermal exposure to this  
26 chemical.

1           26. At all times relevant to this action, Defendants, therefore, have knowingly and  
2 intentionally exposed the users and/or handlers of the PRODUCTS to the LISTED  
3 CHEMICAL without first giving a clear and reasonable warning to such individuals.

4           27. The PRODUCTS have allegedly been sold by Defendants for use in  
5 California since at least August 29, 2011. The PRODUCTS continue to be distributed  
6 and sold in California without the requisite warning information.

7           28. On August 29, 2014, Plaintiff sent a 60-Day Notice of Proposition 65 (“Notice I”)   
8 violations to the requisite public enforcement agencies, and to the Bioplex Defendants. A true   
9 and correct copy of Notice I is attached hereto as Exhibit A and incorporated by reference.   
10 Notice I was issued pursuant to, and in compliance with, the requirements of H&S Code   
11 §25249.7(d) and the statute's implementing regulations regarding the notice of the violations to   
12 be given to certain public enforcement agencies and to the violator. Notice I included, *inter*   
13 *alia*, the following information: the name, address, and telephone number of the noticing   
14 individual; the name of the alleged violator; the statute violated; the approximate time period   
15 during which violations occurred; and descriptions of the violations, including the chemicals   
16 involved, the routes of toxic exposure, and the specific product or type of product causing the   
17 violations, and was issued as follows:

- 18           a.       Bioplex Defendants were provided a copy of the Notice by Certified  
19                    Mail.
- 20           b.       Bioplex Defendants were provided a copy of a document entitled “The  
21                    Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition  
22                    65): A Summary,” which is also known as Appendix A to Title 27 of  
23                    CCR §25903.
- 24           c.       The California Attorney General was provided a copy of the Notice via  
25                    online submission.
- 26           d.       The California Attorney General was provided with a Certificate of Merit

1 by the attorney for the noticing party, stating that there is a reasonable  
2 and meritorious case for this action, and attaching factual information  
3 sufficient to establish a basis for the certificate, including the identity of  
4 the persons consulted with and relied on by the certifier, and the facts,  
5 studies, or other data reviewed by those persons, pursuant to H&S Code  
6 §25249.7(h) (2).

7 29. On August 29, 2014, Plaintiff sent a 60-Day Notice of Proposition 65 (“Notice II”)   
8 violations to the requisite public enforcement agencies, and to the Frozen X-Plosion  
9 Defendants. A true and correct copy of Notice II is attached hereto as Exhibit B and  
10 incorporated by reference. Notice II was issued pursuant to, and in compliance with, the  
11 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding  
12 the notice of the violations to be given to certain public enforcement agencies and to the  
13 violator. Notice II included, *inter alia*, the following information: the name, address, and  
14 telephone number of the noticing individual; the name of the alleged violator; the statute  
15 violated; the approximate time period during which violations occurred; and descriptions of the  
16 violations, including the chemicals involved, the routes of toxic exposure, and the specific  
17 product or type of product causing the violations, and was issued as follows:

- 18 e. Frozen X-Plosion Defendants were provided a copy of the Notice by  
19 Certified Mail.
- 20 f. Frozen X-Plosion Defendants were provided a copy of a document  
21 entitled “The Safe Drinking Water and Toxic Enforcement Act of 1986  
22 (Proposition 65): A Summary,” which is also known as Appendix A to  
23 Title 27 of CCR §25903.
- 24 g. The California Attorney General was provided a copy of the Notice via  
25 online submission.
- 26 h. The California Attorney General was provided with a Certificate of Merit  
by the attorney for the noticing party, stating that there is a reasonable

1 and meritorious case for this action, and attaching factual information  
2 sufficient to establish a basis for the certificate, including the identity of  
3 the persons consulted with and relied on by the certifier, and the facts,  
4 studies, or other data reviewed by those persons, pursuant to H&S Code  
5 §25249.7(h) (2).

6 30. At least 60-days have elapsed since Plaintiff sent Notice I and Notice II to the  
7 Defendants. The appropriate public enforcement agencies have failed to commence and  
8 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against  
9 Defendants based on the allegations herein.

10 31. As a proximate result of acts by Defendants, as persons in the course of doing  
11 business within the meaning of Health & Safety Code §25249.11, individuals throughout the  
12 State of California, including in the County of Alameda, have been exposed to the LISTED  
13 CHEMICAL without a clear and reasonable warning. The individuals subject to the illegal  
14 exposures include normal and foreseeable users of the PRODUCTS, as well as all other  
15 persons exposed to the PRODUCTS.

16 **FIRST CAUSE OF ACTION**  
17 **(Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning**  
18 **the PRODUCTS described in the August 29, 2014 Prop. 65 Notices)**  
**Against All Defendants**

19 32. Plaintiff realleges and incorporates by reference all preceding paragraphs as if  
20 specifically set forth herein.

21 27. By committing the acts alleged in this Complaint, Defendants at all times relevant to  
22 this action, and continuing through the present, have violated H&S Code §25249.6 by, in the  
23 course of doing business, knowingly and intentionally exposing individuals who use or handle  
24 the PRODUCTS set forth in Notice I and Notice II to the LISTED CHEMICAL, without first  
25 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6  
26 and 25249.11(f).



1 **THE NEED FOR INJUNCTIVE RELIEF**

2 34. Plaintiff realleges and incorporates by this reference all preceding paragraphs as  
3 if set forth below.

4 35. By committing the acts alleged in this Complaint, Defendants have caused  
5 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence  
6 of equitable relief, Defendants will continue to create a substantial risk of irreparable injury by  
7 continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED  
8 CHEMICAL through the use and/or handling of the PRODUCTS.

9 **PRAYER FOR RELIEF**

10 Wherefore, Plaintiff accordingly prays for the following relief:

11 A. A preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),  
12 enjoining Defendants, their agents, employees, assigns and all persons acting in concert or  
13 participating with Defendants, from distributing or selling the PRODUCTS in California  
14 without first providing a clear and reasonable warning, within the meaning of Proposition 65,  
15 that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICAL;

16 B. An injunctive order, pursuant to H&S Code §25249.7(b), compelling  
17 Defendants to identify and locate each individual who has purchased the PRODUCTS since  
18 August 29, 2011, and to provide a warning to such person that the use of the PRODUCTS will  
19 expose the user to chemicals known to cause cancer, birth defects, and other reproductive  
20 harm;

21 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),  
22 against DEFENDANT in the amount of \$2,500 per day for each violation of Proposition 65, in  
23 an amount in excess of \$15 million;

24 D. An award to Plaintiff of its reasonable attorney's fees and costs of suit pursuant  
25 to California Code of Civil Procedure §1021.5, as Plaintiff shall specify in further application  
26 to the Court; and,

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E. Such other and further relief as may be just and proper.

Dated: December 9, 2014

LAW OFFICE OF CHRISTINA M. CARO



Christina M. Caro

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**Exhibit A**

## LAW OFFICE OF CHRISTINA M. CARO

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2506 Haste St.  
Berkeley, CA 94704

Tel: (510) 387-8597  
Fax: (510) 295-2649

christina@ccarolaw.com  
www.ccarolaw.com

### VIA CERTIFIED MAIL

Current CEO or President  
Bioplex Nutrition, Inc.  
150 West Axton Road, #1  
Bellingham, WA 98226

Current CEO or President  
Bioplex Nutrition, Inc.  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Current CEO or President  
Bioplex Nutrition, Inc.  
2252 Odell Street  
Blaine, WA 98230

Current CEO or President  
Bioplex Nutrition, Inc.  
5160 Industrial Place, #106  
Ferndale, WA 98248

Current CEO or President  
Bioplex Pure Nutrition, LLC  
11768 Westar Lane  
Burlington, WA 98233

Current CEO or President  
Bioplex Pure Nutrition, LLC  
333 North Hill Boulevard  
Burlington, WA 98233

B D Services Corporation  
(Bioplex Nutrition, Inc.'s  
Registered Agent for Service of Process)  
300 North Commercial Street  
Bellingham, WA 98225

Current CEO or President  
Camano Island Management, Inc.  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Onue1 Consulting, LLC  
(Bioplex Pure Nutrition, LLC's  
Registered Agent for Service of Process)  
11768 Westar Lane, Units D & E  
Burlington, WA 98233

Jeffrey A. Ericson  
(Camano Island Management, Inc.'s  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Onue1 Consulting, LLC  
(Bioplex Pure Nutrition, LLC's  
Registered Agent for Service of Process)  
c/o COREY ZEMBRUSKI  
Onue1 Consulting, LLC's Registered Agent  
for Service of Process  
1115 CURTIS STREET  
BURLINGTON, WA 98233

### VIA ONLINE SUBMISSION

Office of the California Attorney General

### VIA PRIORITY MAIL

District Attorneys of All California Counties  
and Select City Attorneys  
(See Attached Certificate of Service)

**Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.***

Dear Addressees:

I represent the Environmental Research Center, Inc. (“ERC”) in connection with this Notice of Violations of California’s Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

The names of the Companies covered by this notice that violated Proposition 65 (hereinafter the “Violators”) are:

**Bioplex Nutrition, Inc.**  
**Bioplex Pure Nutrition, LLC**  
**Camano Island Management, Inc.**

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

**Bioplex Nutrition Inc. Whey In Weight Gainer Vanilla Cream - Lead**  
**Bioplex Nutrition Inc. Whey In Weight Gainer Chocolate - Lead**

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

This letter is a notice to each of the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter to each of the Violators.

Each of the Violators has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and

reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. Each of the Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since August 29, 2011, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless each of the Violators agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above products in the last three years. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



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Christina M. Caro

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Bioplex Nutrition, Inc., Bioplex Pure Nutrition, LLC, Camano Island Management, Inc. and their Registered Agents for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

**CERTIFICATE OF MERIT**

**Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations by Bioplex Nutrition, Inc.; Bioplex Pure Nutrition, LLC; Camano Island Management, Inc.**

I, Christina Caro, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that 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. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & 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: August 29, 2014



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Christina M. Caro

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On August 29, 2014, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; “THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY”** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President  
Bioplex Nutrition, Inc.  
150 West Axton Road, #1  
Bellingham, WA 98226

Current CEO or President  
Camano Island Management, Inc.  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Current CEO or President  
Bioplex Nutrition, Inc.  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Onue1 Consulting, LLC  
(Bioplex Pure Nutrition, LLC’s  
Registered Agent for Service of Process)  
11768 Westar Lane, Units D & E  
Burlington, WA 98233

Current CEO or President  
Bioplex Nutrition, Inc.  
2252 Odell Street  
Blaine, WA 98230

Jeffrey A. Ericson  
(Camano Island Management, Inc.’s  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Current CEO or President  
Bioplex Nutrition, Inc.  
5160 Industrial Place, #106  
Ferndale, WA 98248

Current CEO or President  
Bioplex Pure Nutrition, LLC  
333 North Hill Boulevard  
Burlington, WA 98233

Current CEO or President  
Bioplex Pure Nutrition, LLC  
11768 Westar Lane  
Burlington, WA 98233

Onue1 Consulting, LLC  
(Bioplex Pure Nutrition, LLC’s  
Registered Agent for Service of Process)  
c/o COREY ZEMBRUSKI  
Onue1 Consulting, LLC’s Registered Agent  
for Service of Process  
1115 CURTIS STREET  
BURLINGTON, WA 98233

B D Services Corporation  
(Bioplex Nutrition, Inc.’s  
Registered Agent for Service of Process)  
300 North Commercial Street  
Bellingham, WA 98225

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

August 29, 2014

Page 6

On August 29, 2014, I electronically served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice>:

Office of the California Attorney General  
Prop 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
Oakland, CA 94612-0550

On August 29, 2014, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it with the U.S. Postal Service with the postage fully prepaid for delivery by Priority Mail.

Executed on August 29, 2014, in Fort Oglethorpe, Georgia.

  
\_\_\_\_\_  
Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

August 29, 2014

Page 7

**Service List**

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 <sup>nd</sup> Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 <sup>rd</sup> Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
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District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
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District Attorney, Humboldt County 825 5th Street 4 <sup>th</sup> Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
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District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 <sup>th</sup> Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
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District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 <sup>nd</sup> Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	

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**Exhibit B**

## LAW OFFICE OF CHRISTINA M. CARO

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2506 Haste St.  
Berkeley, CA 94704

Tel: (510) 387-8597  
Fax: (510) 295-2649

christina@ccarolaw.com  
www.ccarolaw.com

### VIA CERTIFIED MAIL

Current CEO or President  
Camano Island Coffee Roasters, LLC  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Current CEO or President  
Camano Island Management, Inc.  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Current CEO or President  
Frozen X-Plosion, LLC  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Camano Island Management, Inc.  
(Camano Island Coffee Rosters, LLC's  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Camano Island Management, Inc.  
(Frozen X-Plosion, LLC's  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Jeffrey A. Ericson  
(Camano Island Management, Inc.'s  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

### VIA ONLINE SUBMISSION

Office of the California Attorney General

### VIA PRIORITY MAIL

District Attorneys of All California Counties  
and Select City Attorneys  
(See Attached Certificate of Service)

**Re: Notice of Violations of California Health & Safety Code Section 25249.5 et seq.**

Dear Addressees:

I represent Environmental Research Center, Inc. (“ERC”) in connection with this Notice of Violations of California’s Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

The names of the Companies covered by this notice that violated Proposition 65 (hereinafter the “Violators”) are:

**Frozen X-Plosion, LLC**  
**Camano Island Management, Inc.**  
**Camano Island Coffee Roasters, LLC**

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

**FrozenXplosion Protein Generation Smoothie Chocolate - Lead**  
**FrozenXplosion Protein Generation Smoothie Acai Blue Berry - Lead**  
**Frozen X-plosion Base - Lead**

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

This letter is a notice to each of the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter to each of the Violators.

Each of the Violators has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a

warning that appears on the product's label. Each of the Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since August 29, 2011, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless each of the Violators agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons who purchased the above products in the last three years. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



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Christina M. Caro

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Frozen X-Plosion, LLC, Camano Island Management, Inc., Camano Island Coffee Roasters, LLC and their Registered Agents for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

**CERTIFICATE OF MERIT**

**Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations  
by Camano Island Management, Inc.; Camano Island Coffee Roasters, LLC;  
Frozen X-Plosion, LLC**

I, Christina Caro, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that 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. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & 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: August 29, 2014



\_\_\_\_\_  
Christina M. Caro

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On August 29, 2014, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; “THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY”** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President  
Camano Island Coffee Roasters, LLC  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

Camano Island Management, Inc.  
(Camano Island Coffee Rosters, LLC’s  
Registered Agent for Service of Process)  
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Camano Island, WA 98282

Jeffrey A. Ericson  
(Camano Island Management, Inc.’s  
Registered Agent for Service of Process)  
848 North Sunrise Blvd., Suite B  
Camano Island, WA 98282

On August 29, 2014, I electronically served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General’s website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice>:

Office of the California Attorney General  
Prop 65 Enforcement Reporting  
1515 Clay Street, Suite 2000  
Oakland, CA 94612-0550

On August 29, 2014, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it with the U.S. Postal Service with the postage fully prepaid for delivery by Priority Mail.

Executed on August 29, 2014, in Fort Oglethorpe, Georgia.

  
Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

August 29, 2014

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