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16 Attorneys for Plaintiff
17 JOHN MOORE

ENDORSED
FILED
Superior Court of California
County of San Francisco
JAN 23 2015
CLERK OF THE COURT
BY: ROSSALY DE LA VEGA
Deputy Clerk

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 COUNTY OF SAN FRANCISCO - UNLIMITED CIVIL JURISDICTION

20 JOHN MOORE,
21 Plaintiff,
22 v.
23 VICTORY INTERNATIOAL GROUP,
24 LLC; WAL-MART STORES, INC.; and
25 DOES 1 -100, inclusive,
26 Defendants.

Case No. CGC-15-543815

COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF
(Health & Safety Code § 25249.6, *et seq.*)

BY FAX

NATURE OF THE ACTION

1. This Complaint is a representative action brought by plaintiff John Moore ("Plaintiff") in the public interest of the citizens of the State of California to enforce the public's right to be informed of the presence of di(2-ethylhexyl)phthalate ("DEHP"), a toxic chemical found in headphones with Vinyl/PVC components sold in California. DEHP is a toxic chemical found in a variety of products.

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

5 3. Detectable levels of DEHP are commonly found in and on headphones with
6 Vinyl/PVC components that Defendants manufacture, import, distribute, and/or offer for sale
7 to consumers throughout the State of California.

8 4. Under the Safe Drinking Water and Toxic Enforcement Act of 1986, codified at
9 Health & Safety Code § 25249.5 *et seq.* ("Proposition 65"), "[n]o person in the course of doing
10 business shall knowingly and intentionally expose any individual to a chemical known to the
11 state to cause cancer or reproductive toxicity without first giving clear and reasonable warning
12 to such individual" Health & Safety Code § 25249.6.

13 5. Pursuant to Proposition 65, on October 24, 2003, California identified and listed
14 DEHP as a chemical known to cause birth defects and other reproductive harm. DEHP became
15 subject to the "clear and reasonable warning" requirements of the Proposition 65 one year later
16 on October 24, 2004. 27 Cal. Code Regs. § 27001(c); Health & Safety Code §§ 25249.8 &
17 25249.10(b).

18 6. DEHP is hereinafter referred to as the "Listed Chemical."

19 7. Defendant Victory International Group, LLC ("Victory") manufactures,
20 distributes, imports, sells and/or offers for sale in California headphones with Vinyl/PVC
21 components containing DEHP without a warning including, but not limited to, Accellorize
22 Headband Headphones, #00102, UPC #8 90968 00102 3.

23 8. Defendant Wal-Mart Stores, Inc. ("Wal-Mart") manufactures, distributes,
24 imports, sells and/or offers for sale in California headphones with Vinyl/PVC components
25 containing lead without a warning including, but not limited to, Accellorize Headband
26 Headphones, #00102, UPC #8 90968 00102 3.

27 9. All products containing the Listed Chemicals as identified in paragraphs 7 and 8
28 above shall hereinafter be referred to as the "Products."

1 10. Defendants' failures to warn consumers and/or other individuals and workers
2 (specifically those not subject to California's Occupational Health Act, Labor Code section
3 6300 et seq. or exempted under the out-of-state manufacturer rule) in the State of California
4 about their exposures to the Listed Chemical in conjunction with Defendants' sales of the
5 Products, is a violation of Proposition 65 and subjects Defendants to enjoinder of such
6 conduct as well as civil penalties for each violation. Health & Safety Code § 25249.7(a) &
7 (b)(1).

8 11. For Defendants' violations of Proposition 65, Plaintiff seeks preliminary and
9 permanent injunctive relief to compel Defendants to provide purchasers or users of the
10 Products with the required warning regarding the health hazards of the Listed Chemical in the
11 Products. Health & Safety Code § 25249.7(a).

12 12. Pursuant to Health & Safety Code § 25249.7(b), Plaintiff also seeks civil
13 penalties against Defendants for their violations of Proposition 65.

14 **PARTIES**

15 13. Plaintiff John Moore ("Plaintiff") is a citizen of the State of California who is
16 dedicated to protecting the health of California citizens through the elimination or reduction of
17 toxic exposures from consumer products, and he brings this action in the public interest
18 pursuant to Health & Safety Code § 25249.7(d).

19 14. Defendant Victory is a "person in the course of doing business" within the
20 meaning of Health & Safety Code §§ 25249.6 and 25249.11.

21 15. Victory manufactures, imports, distributes, sells, and/or offers the Products for
22 sale or use in the State of California, or implies by its conduct that it manufactures, imports,
23 distributes, sells, and/or offers the Products for sale or use in the State of California.

24 16. Defendant Wal-Mart is a "person in the course of doing business" within the
25 meaning of Health & Safety Code §§ 25249.6 and 25249.11.

26 17. Wal-Mart manufactures, imports, distributes, sells, and/or offers the Products for
27 sale or use in the State of California, or implies by its conduct that it manufactures, imports,
28 distributes, sells, and/or offers the Products for sale or use in the State of California.

1 18. Defendants Does 1-100 are each “persons in the course of doing business” within
2 the meaning of Health & Safety Code § 25249.11(b), which manufacture, distribute, sell,
3 and/or offer the Products for sale in the State of California. At this time, the true names and
4 capacities of defendants Does 1 through 100, inclusive, are unknown to Plaintiff, who,
5 therefore, sues said defendants by their fictitious names pursuant to Code of Civil Procedure
6 section 474. Plaintiff is informed and believes, and on that basis alleges, that each of the
7 fictitiously named defendants is responsible for the acts and occurrences alleged herein. When
8 ascertained, their true names and capacities shall be reflected in an amended complaint.

9 19. Defendants Victory, Wal-Mart, and Does 1 -100 are collectively referred to
10 herein as “Defendants.”

11 **VENUE AND JURISDICTION**

12 20. Venue is proper in San Francisco Superior Court, pursuant to Code of Civil
13 Procedure sections 393, 395, and 395.5, because this Court is a court of competent jurisdiction,
14 because Plaintiff seeks civil penalties against Defendants, because one or more instances of
15 wrongful conduct occurred, and continue to occur, in the City and County of San Francisco,
16 and/or because Defendants conducted, and continue to conduct, business in this county with
17 respect to the Products.

18 21. The California Superior Court has jurisdiction over this action pursuant to
19 California Constitution Article VI, section 10, which grants the Superior Court “original
20 jurisdiction in all causes except those given by statute to other trial courts.” The statute under
21 which this action is brought does not specify any other basis of subject matter jurisdiction.

22 22. The California Superior Court has jurisdiction over Defendants based on
23 Plaintiff’s information and good faith belief that each of the Defendants is a person, firm,
24 corporation, or association that is a citizen of the State of California, has sufficient minimum
25 contacts in the State of California, and/or otherwise purposefully avails itself of the California
26 market. Defendants’ purposeful availment of California as a marketplace for the Products
27 renders the exercise of personal jurisdiction by California courts over Defendants consistent
28 with traditional notions of fair play and substantial justice.

1 **FIRST CAUSE OF ACTION**

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

3 23. Plaintiff re-alleges and incorporates by reference, as if fully set forth herein,
4 Paragraphs 1 through 22, inclusive.

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

9 25. Proposition 65 states, “No person in the course of doing business shall
10 knowingly and intentionally expose any individual to a chemical known to the state to cause
11 cancer or reproductive toxicity without first giving clear and reasonable warning to such
12 individual” Health & Safety Code § 25249.6.

13 26. On September 30, 2014, Plaintiff’s sixty-day notice of violation, together with
14 the requisite certificate of merit, was served on International Greetings and certain public
15 prosecutors stating that, as a result of Defendants’ sales of the Products containing DEHP,
16 purchasers and users in the State of California were being exposed to DEHP resulting from
17 their reasonably foreseeable use of the Products, without the individual purchasers and users
18 first having been provided with a “clear and reasonable warning” regarding such toxic
19 exposures, as required by Proposition 65. This notice is attached hereto as Exhibit A.

20 27. Defendants have engaged in the manufacture, importation, distribution, sale, and
21 offering of the Products for sale or use in violation of Health & Safety Code § 25249.6, and
22 Defendants’ violations have continued to occur beyond their receipt of Plaintiff’s sixty-day
23 notice of violation. As such, Defendants’ violations are ongoing and continuous in nature, and
24 will continue to occur in the future.

25 28. After receiving Plaintiff’s sixty-day notice of violation, the appropriate public
26 prosecutors have failed to commence and diligently prosecute a cause of action against
27 Defendants under Proposition 65.

1 29. The Products manufactured, imported, distributed, sold, and offered for sale or
2 use in California by Defendants contain the Listed Chemical such that they require a “clear and
3 reasonable” warning under Proposition 65.

4 30. Defendants knew or should have known that the Products they manufacture,
5 import, distribute, sell, and offer for sale or use in California contain the Listed Chemical.

6 31. The Listed Chemical is present in or on the Products in such a way as to expose
7 individuals to the Listed Chemical through dermal contact and/or ingestion during reasonably
8 foreseeable use of the Products including through workplace exposure to the Products.

9 32. The normal and reasonably foreseeable uses of the Products have caused, and
10 continue to cause, consumer exposures to the Listed Chemical, as such exposures are defined
11 by the California Code of Regulations Title 27, section 25602(b).

12 33. Defendants had knowledge that the normal and reasonably foreseeable uses of
13 the Products expose individuals to the Listed Chemical through dermal contact and/or
14 ingestion.

15 34. Defendants intended that such exposures to the Listed Chemical from the
16 reasonably foreseeable uses of the Products would occur by Defendants’ deliberate, non-
17 accidental participation in the manufacture, importation, distribution, sale, and offering of the
18 Products for sale or use to individuals in the State of California.

19 35. Defendants failed to provide a “clear and reasonable warning” to those
20 consumers and other individuals in the State of California who were or who would become
21 exposed to the Listed Chemical through dermal contact and/or ingestion during the reasonably
22 foreseeable uses of the Products including through workplace exposure to the Products.

23 36. Contrary to the express policy and statutory prohibition of Proposition 65
24 enacted directly by California voters, individuals exposed to the listed chemical through dermal
25 contact and/or ingestion resulting from the reasonably foreseeable uses of the Products
26 including through workplace exposure to the Products sold by Defendants without a “clear and
27 reasonable warning,” have suffered, and continue to suffer, irreparable harm for which they
28 have no plain, speedy, or adequate remedy at law.

1 37. Pursuant to Health & Safety Code § 25249.7(b), as a consequence of the above-
2 described acts, Defendants are liable for a maximum civil penalty of \$2,500 per day for each
3 violation.

4 38. As a consequence of the above-described acts, Health & Safety Code
5 § 25249.7(a) also specifically authorizes the Court to grant injunctive relief against Defendants.

6 **PRAYER FOR RELIEF**

7 Wherefore, Plaintiff prays for judgment against Defendants, and each of them, as
8 follows:

9 1. That the Court, pursuant to Health & Safety Code § 25249.7(b), assess civil
10 penalties against Defendants in the amount of \$2,500 per day for each violation;

11 2. That the Court, pursuant to Health & Safety Code § 25249.7(a), preliminarily
12 and permanently enjoin Defendants from manufacturing, distributing, or offering the Products
13 for sale or use in California without first providing a “clear and reasonable warning” as defined
14 by the California Code of Regulations title 27, section 25601 *et seq.*, as to the harms associated
15 with exposures the Listed Chemical;

16 3. That the Court, pursuant to Health & Safety Code § 25249.7(a), issue
17 preliminary and permanent injunctions mandating that Defendants recall all Products currently
18 in the chain of commerce in California without a “clear and reasonable warning” as defined by
19 California Code of Regulations title 27, section 25601 *et seq.*;

20 4. That the Court grant Plaintiff his reasonable attorneys’ fees and costs of suit; and

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

22 Dated: January 23, 2015

Respectfully Submitted,

23 MOSCONE EMBLIDGE & OTIS LLP

24
25
26 By: 

27 Laurence D. Haveson
28 Attorneys for Plaintiff JOHN MOORE

Exhibit A

60-DAY NOTICE OF VIOLATION

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

DATE: September 30, 2014

TO: Dawson Fan, President – Victory International Group, LLC
Douglas McMillon, President – Wal-Mart Stores, Inc.
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: John Moore

I. INTRODUCTION

My name is John Moore. 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, Victory International Group, LLC and Wal-Mart Stores, Inc. (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 September 30, 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:

John Moore
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>
Accellorize Headband Headphones, #00102, UPC #8 90968 00102 3	Wal-Mart Stores, Inc. Placer County, Northern California	Victory International Group, LLC

VII. EXHIBIT A

<i>Product Category/Type</i>	<i>Such As*</i>	<i>Toxins</i>
Headphones with Vinyl/PVC Components	Accellorize Headband Headphones, #00102, UPC #8 90968 00102 3	Di(2-ethylhexyl)phthalate

*The specifically identified example of the type of product that is subject to this Notice is 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 category/type listed in Exhibit A. It is important to note that this example is not meant to be an exhaustive or comprehensive identification of each specific offending product of the type 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 type or category 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 September 30, 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:

Dawson Fan, President
Victory International Group, LLC
9500 South 500 West, Suite 207
Sandy, UT 84070

Dawson Fan, President
Victory International Group, LLC
6430 Oak Canyon, Suite 200
Irvine, CA 92618

Dawson Fan, President
Victory International Group, LLC
5590 East Francis Street
Ontario, CA 91761

Dawson Fan, President
Victory International Group, LLC
1630 West Venus Street
Fayetteville, AR 72701

Douglas McMillon, President
Wal-Mart Stores, Inc.
702 SW 8th Street
Bentonville, AR 72716

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 September 30, 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: September 30, 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 96120

The Honorable Todd Riebe
Amador County District Attorney
708 Court Street
Jackson, CA 95962

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

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

The Honorable John R. Poyner
Colusa County District Attorney
346 Fifth Street
Colusa, CA 95932

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

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

The Honorable Vernon Pierson
El Dorado County District Attorney
515 Main Street
Placerville, CA 95667

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 95988

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 93526

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. 8
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 Keltz
Madera County District Attorney
209 West Yosemite Avenue
Madera, CA 93637

The Honorable Edward Berberian
Marin County District Attorney
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 95338

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

The Honorable Larry Morse II
Merced County District Attorney
550 W. Main Street
Merced, CA 95340

The Honorable Gary Woolverton
Modoc County District Attorney
204 S. Court Street, Room 202
Alturas, CA 96101

The Honorable George Booth
Mono County District Attorney
P.O. Box 617
Bridgeport, CA 93517

The Honorable Dean Filippo
Monterey County District Attorney
P.O. Box 1131
Salinas, CA 93902

The Honorable Gary Lieberstein
Napa County District Attorney
P.O. Box 720
Napa, CA 94559

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

The Honorable Tony Rackauckas
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
316 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 Willett
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
Santa 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
100 Courthouse Square, Second Floor
Downieville, CA 95936

The Honorable James Kirk Andrus
Siskiyou County District Attorney
P.O. Box 986
Yreka, CA 96097

The Honorable Donald A. du Bain
Solano County District Attorney
675 Texas Street, Suite 4500
Fairfield, CA 94533

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

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

The Honorable Carl Adams
Sutter County District Attorney
446 Second Street
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
PO Box 310
Weaverville, CA 96093

The Honorable Phillip Cline
Tulare County District Attorney
221 South Mooney Boulevard, Suite 224
Visalia, CA 93291

The Honorable Donald Segerstrom, Jr
Tuolumne County District Attorney
423 North Washington Street
Sonora, CA 95370

The Honorable Gregory Totten
Ventura County District Attorney
800 South Victoria Avenue
Ventura, CA 93009

The Honorable Jeff Reisig
Yolo County District Attorney
301 Second Street
Woodland, CA 95695

The Honorable Patrick McGrath
Yuba County District Attorney
301 Second Street
Marysville, CA 95901

The Honorable Mike Feuer
Office of the City Attorney, Los Angeles
200 North Main Street
Los Angeles, CA 90012

The Honorable Jan Goldsmith
Office of the City Attorney, San Diego
1200 Third Avenue, Suite 1620
San Diego, CA 92101

The Honorable Eileen M. Teichert
Office of the City Attorney, Sacramento
915 I Street, 4th Floor
Sacramento, CA 95814

The Honorable Dennis J. Herrera
Office of the City Attorney, San Francisco
City Hall, Room 234
San Francisco, CA 94102

The Honorable Richard Doyle
Office of the City Attorney, San Jose
200 East Santa Clara Street
San Jose, CA 95113

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