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17 LAURENCE VINO CUR

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

20 LAURENCE VINO CUR,
21 Plaintiff,

22 v.

23 EPIC PRODUCTS, INC. GELSON'S
24 MARKETS; and DOES 1 -100, inclusive,
25 Defendants.

26 Case No. **CGC - 15 - 543578**

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

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

29 **NATURE OF THE ACTION**

30 1. This Complaint is a representative action brought by plaintiff Laurence Vinocur
31 ("Plaintiff") in the public interest of the citizens of the State of California to enforce the
32 citizens' right to be informed of the presence of lead, a toxic chemical found in shot glasses
33 with exterior designs sold in California. Lead is a toxic chemical found in a variety of products.

34 2. By this Complaint, Plaintiff seeks to remedy Defendants' continuing failures to
35 warn California citizens about the risk of exposure to lead present in and on shot glasses with

36 ENDORSED
37 FILED
38 Superior Court of California
39 County of San Francisco

40 JAN 09 2015

41 CLERK OF THE COURT
42 BY: MARY A. MORAN
43 Deputy Clerk

44 BY FAX

1 exterior designs manufactured, distributed, and offered for sale or use to consumers throughout
2 the State of California.

3 3. Detectable levels of lead are commonly found in and on shot glasses with
4 exterior designs that Defendants manufacture, distribute, and offer for sale to consumers
5 throughout the State of California.

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

11 5. Pursuant to Proposition 65, on February 27, 1987, California identified and listed
12 Lead as a chemical known to cause birth defects and other reproductive harm. Lead became
13 subject to the “clear and reasonable warning” requirements of the Proposition 65 one year later
14 on February 27, 1988. 27 Cal. Code Regs. § 27001(c); Health & Safety Code §§ 25249.8 &
15 25249.10(b).

16 6. Lead is hereinafter referred to as the “Listed Chemical.”

17 7. Defendant Epic Products, Inc. (“Epic”) manufactures, distributes, imports, sells
18 and/or offers for sale in California shot glasses with exterior designs containing lead without a
19 warning including, but not limited to, Celebrate the Good Life! Epic Professional Shot Glass,
20 UPC #0 77757 91110 1.

21 8. Defendant Gelson’s’s Markets (“Gelson’s”) manufactures, distributes, imports,
22 sells and/or offers for sale in California shot glasses with exterior designs containing lead
23 without a warning including, but not limited to, Celebrate the Good Life! Epic Professional
24 Shot Glass, UPC #0 77757 91110 1.

25 9. All products containing the Listed Chemicals as identified in paragraphs 7 and 8
26 above shall hereinafter be referred to as the “Products.”

27 10. Defendants’ failures to warn consumers and/or other individuals and workers
28 (specifically those not subject to California's Occupational Health Act, Labor Code section

1 6300 et seq. or exempted under the out-of-state manufacturer rule) in the State of California
2 about their exposures to the Listed Chemical in conjunction with Defendants’ sales of the
3 Products, is a violation of Proposition 65 and subjects Defendants to enjoinder of such
4 conduct as well as civil penalties for each violation. Health & Safety Code § 25249.7(a) &
5 (b)(1).

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

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

12 **PARTIES**

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

17 14. Defendant Epic is a “person in the course of doing business” within the meaning
18 of Health & Safety Code §§ 25249.6 and 25249.11.

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

22 16. Defendant Gelson’s is a “person in the course of doing business” within the
23 meaning of Health & Safety Code §§ 25249.6 and 25249.11.

24 17. Gelson’s manufactures, imports, distributes, sells, and/or offers the Products for
25 sale or use in the State of California, or implies by its conduct that it manufactures, imports,
26 distributes, sells, and/or offers the Products for sale or use in the State of California.

27 18. Defendants Does 1 -100 are each “persons in the course of doing business”
28 within the meaning of Health & Safety Code § 25249.11(b), which manufacture, distribute,

1 sell, and/or offer the Products for sale in the State of California. At this time, the true names
2 and capacities of defendants Does 1 through 100, inclusive, are unknown to Plaintiff, who,
3 therefore, sues said defendants by their fictitious names pursuant to Code of Civil Procedure
4 section 474. Plaintiff is informed and believes, and on that basis alleges, that each of the
5 fictitiously named defendants is responsible for the acts and occurrences alleged herein. When
6 ascertained, their true names and capacities shall be reflected in an amended complaint.

7 19. Defendants Epic, Gelson's, and Does 1 -100 are collectively referred to herein as
8 "Defendants."

9 **VENUE AND JURISDICTION**

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

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

20 22. The California Superior Court has jurisdiction over Defendants based on
21 Plaintiff's information and good faith belief that each of the Defendants is a person, firm,
22 corporation, or association that is a citizen of the State of California, has sufficient minimum
23 contacts in the State of California, and/or otherwise purposefully avails itself of the California
24 market. Defendants' purposeful availment of California as a marketplace for the Products
25 renders the exercise of personal jurisdiction by California courts over Defendants consistent
26 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 October 24, 2014, Plaintiff’s sixty-day notice of violation, together with the
14 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 lead,
16 purchasers and users in the State of California were being exposed to lead resulting from their
17 reasonably foreseeable use of the Products, without the individual purchasers and users first
18 having been provided with a “clear and reasonable warning” regarding such toxic exposures, as
19 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.
28

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.

Exhibit A

60-DAY NOTICE OF VIOLATION

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

DATE: October 24, 2014

TO: Steve Dubow, President – Epic Products, Inc.
Rob McDougall, President – Gelson’s Markets
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: Laurence Vinocur

I. INTRODUCTION

My name is Laurence Vinocur. 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, Epic Products, Inc. and Gelson’s Markets (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: Lead
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 October 24, 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.

A. CONSUMER PRODUCT EXPOSURE

California consumers, through the act of buying, acquiring or utilizing the products, are exposed to the listed chemical. By way of example but not limitation, exposures occur when California citizens use, display, clean, repair, pack, unpack, arrange, store or otherwise handle the products. These tasks cause consumers to be exposed directly or indirectly through the routine touching of the parts or portions of the products containing readily available surface amounts of the listed chemical. Additionally, exposure can occur through the routine touching and ingesting of other materials that are contaminated with the listed chemical from the products as a result of these tasks. People likely to be exposed include adults.

B. OCCUPATIONAL EXPOSURE

Similarly, men and women in California use or otherwise handle the products as a part of their jobs and are, therefore, subject to occupational exposures to the listed chemical. Employees are exposed at any California business locations of the apparent manufacturer, distributor and retailer (and their agents, assigns and divisions) as well as all other California locations where the products, or the component parts thereof that include the listed chemical are, by way of example but not limitation, used as a drinking vessel, packed, unpacked, labeled, arranged, displayed, cleaned, stocked, stored, or otherwise handled. These tasks cause employee exposure directly and/or indirectly to the listed chemical through the routine touching of the parts or portions of the products containing readily available amounts of the listed chemical on the surface. Additionally, exposure can occur through the routine touching and ingesting of other materials that are contaminated with the listed chemical from the products as a result of these tasks. These products are also used by sole proprietors and other persons in settings not covered by the federal Occupational Safety Health Act ("OSHA"). This Notice alleges the violation of Proposition 65 with respect to occupational exposure governed by the California State Plan for Occupational Safety and Health (the "State Plan"). The State Plan incorporates the provisions of Proposition 65, as approved by OSHA on June 6, 1997. This approval specifically placed certain conditions with regard to occupational exposures on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliance contained in the general hazard communication requirement to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the California Attorney General.

III. CONTACT INFORMATION

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

Laurence Vinocur
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 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>
Celebrate the Good Life! Epic Professional Shot Glass, UPC #0 77757 91110 1	Gelson's Markets Los Angeles County, Southern California	Epic Products, Inc.

VII. EXHIBIT A

<i>Product Category/Type</i>	<i>Such As*</i>	<i>Toxins</i>
Shot Glasses with Exterior Designs	Celebrate the Good Life! Epic Professional Shot Glass, UPC #0 77757 91110 1	Lead

*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 October 24, 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:

Steve Dubow, President
Epic Products, Inc.
3100 South Susan Street
Santa Ana, CA 92704

Rob McDougall, President
Gelson's Markets
16400 Ventura Boulevard, Suite 240
Encino, CA 91436

Rob McDougall, President
Gelson's Markets
P.O. Box 1802
Encino, CA 91426

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 October 24, 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: October 24, 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 95642

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

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

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

The Honorable Mark Peterson
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Martinez, CA 94553

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Placerville, CA 95667

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Fresno, CA 93721

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Willows, CA 95988

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Independence, CA 93526

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

The Honorable Greg Strickland
Kings County District Attorney
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The Honorable Donald Anderson
Lake County District Attorney
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Lakeport, CA 95453

The Honorable Robert Burns
Lassen County District Attorney
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Susanville, CA 96130

The Honorable Steve Cooley
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Madera, CA 93637

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Mariposa, CA 95338

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Ukiah, CA 95482

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Napa, CA 94559

The Honorable Clifford Newell
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The Honorable Ronald Owens
Placer County District Attorney
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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
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
100 Courthouse Square, Second Floor
Downieville, CA 95936

The Honorable James Kirk Andrus
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Santa Rosa, CA 95403

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Sutter County District Attorney
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The Honorable Jeff Reisig
Yolo County District Attorney
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Woodland, CA 95695

The Honorable Patrick McGrath
Yuba County District Attorney
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200 North Main Street
Los Angeles, CA 90012

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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