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17 LAURENCE VINOUCUR

ENDORSED
FILED
Superior Court of California
County of San Francisco

FEB 27 2015

CLERK OF THE COURT

BY: MARY A. MORAN
Deputy Clerk

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

20 LAURENCE VINOUCUR

21 Plaintiff,

22 v.

23 LINZER PRODUCTS CORP., and DOES
24 1 -100, inclusive,

25 Defendants.

Case No. CGC - 15 - 544402

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

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

BY FAX

NATURE OF THE ACTION

26 1. This Complaint is a representative action brought by plaintiff Laurence Vinocur
27 ("Plaintiff") in the public interest of the citizens of the State of California to enforce the
28 citizens' right to be informed of the presence of Di(2-ethylhexyl)phthalate ("DEHP"), a toxic
chemical found in paint roller grips sold in California. DEHP is a toxic chemical used as a
plasticizer and is used 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 paint roller grips
3 manufactured, distributed, and offered for sale or use to consumers throughout the State of
4 California.

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

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

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

21 6. DEHP is hereinafter referred to as the “Listed Chemical.”

22 7. Defendant Linzer Products Corp. (“Linzer”) manufactures, distributes, imports,
23 sells and/or offers for sale in California paint roller grips containing DEHP without a warning
24 including, but not limited to, Project Select Premium Twist 2 Extend, RF 300, UPC #0 77089
25 30012 3.

26 8. All products containing the Listed Chemicals as listed in paragraph 7 above shall
27 hereinafter be referred to as the “Products.”
28

1 9. Although Defendants expose infants, children, and other people to the Listed
2 Chemical in the Products, Defendants provide no warnings about the carcinogenic hazards
3 associated with exposures to the Listed Chemical. Defendants' failures to warn consumers and
4 other individuals and workers (specifically those not subject to California's Occupational
5 Health Act, Labor Code section 6300 et seq. or exempted under the out-of-state manufacturer
6 rule) in the State of California about their exposures to the Listed Chemicals in conjunction
7 with Defendants' sales of the Products, is a violation of Proposition 65, and subjects
8 Defendants to enjoinder of such conduct as well as civil penalties for each violation. Health
9 & Safety Code § 25249.7(a) & (b)(1).

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

14 11. Pursuant to Health and Safety Code section 25249.7(b), Plaintiff also seeks civil
15 penalties against Defendants for their violations of Proposition 65.

16 **PARTIES**

17 12. Plaintiff Laurence Vinocur is a citizen of the State of California who is dedicated
18 to protecting the health of California citizens through the elimination or reduction of toxic
19 exposures from consumer products, and he brings this action in the public interest pursuant to
20 Health and Safety Code section 25249.7(d).

21 13. Defendant Linzer is a person in the course of doing business within the meaning
22 of Health and Safety Code sections 25249.6 and 25249.11.

23 14. Linzer manufactures, imports, distributes, sells, and/or offers the Products for sale
24 or use in the State of California, or implies by its conduct that it manufactures, imports,
25 distributes, sells, and/or offers the Products for sale or use in the State of California.

26 15. Defendants Does 1 -100 are each persons in the course of doing business within
27 the meaning of Health and Safety Code section 25249.11(b), which manufacture, distribute,
28 sell, and/or offer the Products for sale in the State of California. At this time, the true names

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

6 16. Linzer and Defendants Does 1 -100 are collectively referred to herein as
7 “Defendants.”

8 VENUE AND JURISDICTION

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

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

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

26 FIRST CAUSE OF ACTION

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

1 20. Plaintiff re-alleges and incorporates by reference, as if fully set forth herein,
2 Paragraphs 1 through 19, inclusive.

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

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

10 23. On October 24, 2014, Plaintiff’s sixty-day notice of violation, together with the
11 requisite certificate of merit, was provided to Linzer and certain public enforcement agencies
12 stating that, as a result of Defendants’ sales of the Products containing DEHP, purchasers and
13 users in the State of California were being exposed to DEHP resulting from their reasonably
14 foreseeable use of the Products, without the individual purchasers and users first having been
15 provided with a “clear and reasonable warning” regarding such toxic exposures, as required by
16 Proposition 65. This notice is attached hereto as Exhibit A.

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

22 25. After receiving Plaintiff’s sixty-day notice of violation, the appropriate public
23 enforcement agencies have failed to commence and diligently prosecute a cause of action
24 against Defendants under Proposition 65.

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

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

3 28. The Listed Chemical is present in or on the Products in such a way as to expose
4 individuals to the Listed Chemical through dermal contact, ingestion, and/or inhalation during
5 reasonably foreseeable use of the Products including through workplace exposure to the
6 Products.

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

10 30. Defendants had knowledge that the normal and reasonably foreseeable uses of
11 the Products expose individuals to the Listed Chemical through dermal contact, ingestion,
12 and/or inhalation.

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

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

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

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

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

3
4 Dated: February 27, 2015

Respectfully Submitted,

MOSCONE EMBLIDGE & OTIS LLP

6
7 By:  _____
8 Jordan M. Otis
9 Attorneys for Plaintiff LAURENCE VINOCUR

Exhibit A

60-DAY NOTICE OF VIOLATION

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

DATE: October 24, 2014

TO: Brent Swenson, President – Linzer Products Corp.
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 violator Linzer Products Corp. (the “Violator”). 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 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.

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:

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 Violator's 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 Violator unless such Violator enters 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 Violator is 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 Violator and other retailers and distributors of the manufacturer.

<i>Product*</i>	<i>Retailer(s)</i>	<i>Manufacturer(s)/Distributor(s)</i>
Project Select Premium Twist 2 Extend, RF 300, UPC #0 77089 30012 3	Eames Hardware & Supply Inc. Contra Costa County, Northern California	Linzer Products Corp.

VII. EXHIBIT A

<i>Product Category/Type</i>	<i>Such As*</i>	<i>Toxins</i>
Paint Roller Grips	Project Select Premium Twist 2 Extend, RF 300, UPC #0 77089 30012 3	Di(2-ethylhexyl)phthalate

*The specifically identified example of the type of product that is subject to this Notice is for the recipient’s benefit to assist in its 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 Violator is 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 recipient’s 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 entity 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 entity listed below and providing such envelope to a United States Postal Service Representative:

Brent Swenson, President
Linzer Products Corp.
248 Wyandanch Avenue
West Babylon, NY 11704

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 party identified in the notice has 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 Violator 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 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
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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
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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
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210 West Temple Street, Suite 18000
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The Honorable Michael Keitz
Madera County District Attorney
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Madera, CA 93637

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Ukiah, CA 95482

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Merced, CA 95340

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Napa, CA 94559

The Honorable Clifford Newell
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Nevada City, CA 95959

The Honorable Tony Rackauckas
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Santa Ana, CA 92701

The Honorable Ronald Owens
Placer County District Attorney
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Roseville, CA 95678

The Honorable David Hollister
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The Honorable Michael Ramos
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The Honorable Bonnie Dumanis
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The Honorable Jeffrey Rosen
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San Jose, CA 95110

The Honorable Bob Lee
Santa Cruz County District Attorney
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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
Downville, CA 95936

The Honorable James Kirk Andrus
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Red Bluff, CA 96080

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Visalia, CA 93291

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Sonora, CA 95370

The Honorable Gregory Totten
Ventura County District Attorney
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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
215 Fifth Street
Marysville, CA 95901

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

The Honorable Jan Goldsmith
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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