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WILLIAM F. WRAITH, SBN 185927
WRAITH LAW
24422 Avenida de la Carlota, Suite 400
Laguna Hills, CA 92653
Tel: (949) 452-1234
Fax: (949) 452-1102

Attorney for Plaintiff
ENVIRONMENTAL RESEARCH CENTER, INC.

FILED BY FAX
ALAMEDA COUNTY
September 29, 2015
CLERK OF
THE SUPERIOR COURT
By Alicia Espinoza, Deputy
CASE NUMBER:
RG15787566

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

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

Plaintiff,

v.

NEW WHEY NUTRITION, LLC and DOES
1-25, Inclusive,

Defendants.

Case No.

**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 NEW WHEY
NUTRITION, LLC (collectively referred to as "NEW WHEY NUTRITION") and DOES 1-25
to warn consumers in California that they are being exposed to lead, a substance known to the
State of California to cause cancer, birth defects, and other reproductive harm. NEW WHEY
NUTRITION manufactures, packages, distributes, markets, and/or sells in California the
following products containing lead (collectively, the "PRODUCTS"):

- a) New Whey Nutrition Multi-Pro Whey Isolate Blend Swiss Chocolate
- b) New Whey Nutrition Multi-Pro Whey Isolate Blend Vanilla Cinnamon
- c) New Whey Nutrition Bio Engineered Waximaize Fruit Punch
- d) New Whey Nutrition Bio Engineered Waximaize Grape

2. Lead (hereinafter, the “LISTED CHEMICAL”) is a substance known to the State¹ of California to cause cancer, birth defects, and other reproductive harm.

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

4. NEW WHEY NUTRITION’s past sales and continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS without the required health hazard warnings, cause individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICAL that violate Proposition 65.

5. PLAINTIFF seeks injunctive relief enjoining NEW WHEY NUTRITION from the continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in California without provision of clear and reasonable warnings regarding the risks of cancer, birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS. PLAINTIFF seeks an injunctive order compelling NEW WHEY NUTRITION to bring its business practices into compliance with Proposition 65 by providing a clear and reasonable warning to each individual who has been and who in the future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS. PLAINTIFF also seeks an order compelling NEW WHEY NUTRITION to identify and locate each individual person who in the past has purchased the PRODUCTS,

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 and to provide to each such purchaser a clear and reasonable warning that the use of the
2 PRODUCTS will cause exposures to the LISTED CHEMICAL.

3 6. In addition to injunctive relief, PLAINTIFF seeks an assessment of civil
4 penalties up to the maximum civil penalty of \$2,500 per day per exposure authorized by
5 Proposition 65 to remedy NEW WHEY NUTRITION's failure to provide clear and reasonable
6 warnings regarding exposures to the LISTED CHEMICAL.

7 **JURISDICTION AND VENUE**

8 7. This Court has jurisdiction over this action pursuant to California Constitution
9 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
10 except those given by statute to other trial courts." The statute under which this action is
11 brought does not specify any other basis for jurisdiction.

12 8. This Court has jurisdiction over NEW WHEY NUTRITION because, based on
13 information and belief, NEW WHEY NUTRITION is a business having sufficient minimum
14 contacts with California, or otherwise intentionally availing itself of the California market
15 through the distribution and sale of the PRODUCTS in the State of California to render the
16 exercise of jurisdiction over it by the California courts consistent with traditional notions of
17 fair play and substantial justice.

18 9. Venue in this action is proper in the Alameda Superior Court because NEW
19 WHEY NUTRITION has violated California law in the County of Alameda.

20 **PARTIES**

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

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

1 "clear and reasonable warning" before being exposed to substances listed by the State of
2 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent
3 part:

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

8 18. "‘Knowingly’ refers only to knowledge of the fact that a discharge of, release of,
9 or exposure to a chemical listed pursuant to Section 25249.8(a) of the Act is occurring. No
10 knowledge that the discharge, release or exposure is unlawful is required." (27 California Code
11 of Regulations ("CCR") § 25102(n).)

12 19. Proposition 65 provides that any person "violating or threatening to violate" the
13 statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7). The phrase
14 "threatening to violate" is defined to mean creating "a condition in which there is a substantial
15 likelihood that a violation will occur." (H&S Code §25249.11(e)). Violators are liable for civil
16 penalties of up to \$2,500 per day for each violation of the Act. (H&S Code §25249.7.)

17 **FACTUAL BACKGROUND**

18 20. On February 27, 1987, the State of California officially listed the chemical lead
19 as a chemical known to cause reproductive toxicity. Lead became subject to the warning
20 requirement one year later and was therefore subject to the "clear and reasonable" warning
21 requirements of Proposition 65 beginning on February 27, 1988. (27 CCR § 25000, *et seq.*;
22 H&S Code §25249.5, *et seq.*). Due to the high toxicity of lead, the maximum allowable dose
23 level for lead is 0.5 ug/day (micrograms a day) for reproductive toxicity. (27 CCR
24 § 25805(b).)

25 21. On October 1, 1992, the State of California officially listed the chemicals lead
26 and lead compounds as chemicals known to cause cancer. Lead and lead compounds became
subject to the warning requirement one year later and were therefore subject to the "clear and
reasonable" warning requirements of Proposition 65 beginning on October 1, 1993 (27 CCR §
25000, *et seq.*; H&S Code §25249.6 *et seq.*). Due to the carcinogenicity of lead, the no

1 significant risk level for lead is 15 ug/day (micrograms a day). (27 CCR § 25705(b)(1).)

2 22. On June 15, 2015, PLAINTIFF sent a 60-Day Notice of Proposition 65
3 (“Notice”) violations to the requisite public enforcement agencies, and to NEW WHEY
4 NUTRITION. The Notice was issued pursuant to, and in compliance with, the requirements
5 of H&S Code §25249.7(d) and the statute's implementing regulations regarding the notice of
6 the violations to be given to certain public enforcement agencies and to the violators. A true
7 and correct copy of the 60-Day Notice is attached hereto as **Exhibit A** and incorporated by
8 reference. The Notice was issued as follows:

- 9 a. NEW WHEY NUTRITION and the California Attorney General were
10 provided copies of the Notices of Violations, along with a Certificate of
11 Merit by the attorney for the noticing party stating that there is a reasonable
12 and meritorious cause for this action. The requisite county district attorneys
13 and city attorneys were provided copies of the Notices of Violations and
14 Certificates of Merit.
- 15 b. NEW WHEY NUTRITION was provided, with the Notices of Violations, a
16 copy of a document entitled “The Safe Drinking Water and Toxic
17 Enforcement Act of 1986 (Proposition 65): A Summary,” which is also
18 known as Appendix A to Title 27 of CCR § 25903.
- 19 c. The California Attorney General was provided, with the Notices of
20 Violations, additional factual information sufficient to establish a basis for
21 the Certificates of Merit, including the identity of the persons consulted with
22 and relied on by the certifier, and the facts, studies, or other data reviewed
23 by those persons, pursuant to H&S Code §§25249.7(d)(1) and
24 25249.7(h)(2).

25 23. At least 60-days have elapsed since PLAINTIFF sent the NOTICE to NEW
26 WHEY NUTRITION. The appropriate public enforcement agencies have failed to commence
and diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against NEW

1 WHEY NUTRITION based on the allegations herein.

2 24. Plaintiff is informed and believes, and based on such information and
3 belief, alleges the PRODUCTS have been marketed, distributed, and/or sold to
4 individuals in California allegedly been sold by NEW WHEY NUTRITION for use in
5 California without the requisite clear and reasonable warnings before, on, and after June
6 15, 2012. The PRODUCTS continue to be distributed and sold in California without the
7 requisite warning information.

8 25. As a proximate result of acts by NEW WHEY NUTRITION, as a person in the
9 course of doing business within the meaning of H&S Code §25249.11(b), individuals
10 throughout the State of California, including in the County of Alameda, have been exposed to
11 lead without clear and reasonable warnings. The individuals subject to exposures to lead
12 include normal and foreseeable users of the PRODUCTS, as well as all other persons exposed
13 to the PRODUCTS.

14 26. At all times relevant to this action, NEW WHEY NUTRITION has knowingly
15 and intentionally exposed the users and/or handlers of the PRODUCTS to lead without first
16 giving clear and reasonable warnings to such individuals.

17 27. Individuals using or handling the PRODUCTS are exposed to lead in excess of
18 the “maximum allowable daily” and “no significant risk” levels determined by the State of
19 California, as applicable.

20 28. At all times relevant to this action, each Defendant has, in the course of doing
21 business, failed to provide individuals using and/or handling the PRODUCTS with a clear and
22 reasonable warning that the PRODUCTS exposure individuals to lead.

23 29. The PRODUCTS continue to be marketed, distributed, and/or sold in California
24 without the requisite clear and reasonable warnings.

25 ///

26 ///

FIRST CAUSE OF ACTION

(Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the PRODUCTS described in the June 15, 2015, Prop. 65 Notice) Against NEW WHEY NUTRITION

30. PLAINTIFF re-alleges and incorporates by reference each and every preceding allegation and paragraph as though fully set forth in this cause of action.

31. By committing the acts alleged in this Complaint, NEW WHEY NUTRITION, at all times relevant to this action, and continuing through the present, has violated H&S Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing individuals who use or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6 and 25249.11(f).

32. By the above-described acts, NEW WHEY NUTRITION has violated H&S Code § 25249.6 and is therefore subject to an injunction ordering NEW WHEY NUTRITION to stop violating Proposition 65, to provide warnings to all present and future customers, and to provide warnings to NEW WHEY NUTRITION’s past customers who purchased or used the PRODUCTS without receiving a clear and reasonable warning.

33. An action for injunctive relief under Proposition 65 is specifically authorized by Health & Safety Code §25249.7(a).

34. Continuing commission by NEW WHEY NUTRITION of the acts alleged above will irreparably harm the citizens of the State of California, for which harm they have no plain, speedy, or adequate remedy at law.

35. Wherefore, PLAINTIFF prays for judgment against NEW WHEY NUTRITION, as set forth hereafter.

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1 **SECOND CAUSE OF ACTION**
2 **(Civil Penalties for Violations of Health and Safety Code § 25249.5, et seq. concerning the**
3 **PRODUCTS described in PLAINTIFF’s NOTICE)**
4 **Against NEW WHEY NUTRITION**

5 36. PLAINTIFF re-alleges and incorporates by reference each and every preceding
6 allegation and paragraph as though fully set forth in this cause of action.

7 37. By committing the acts alleged in this Complaint, NEW WHEY NUTRITION
8 at all times relevant to this action, and continuing through the present, has violated H&S Code
9 §25249.6 by, in the course of doing business, knowingly and intentionally exposing individuals
10 who use or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL,
11 without first providing a clear and reasonable warning to such individuals pursuant to H&S
12 Code §§ 25249.6 and 25249.11(f).

13 38. By the above-described acts, NEW WHEY NUTRITION is liable, pursuant to
14 H&S Code §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful
15 exposure to the LISTED CHEMICAL from the PRODUCTS.

16 39. Wherefore, PLAINTIFF prays for judgment against NEW WHEY
17 NUTRITION, as set forth hereafter.

18 **THE NEED FOR INJUNCTIVE RELIEF**

19 40. PLAINTIFF re-alleges and incorporates by this reference each and every
20 preceding allegation and paragraph as though fully set forth in this cause of action.

21 41. By committing the acts alleged in this Complaint, NEW WHEY NUTRITION
22 has caused irreparable harm for which there is no plain, speedy or adequate remedy at law. In
23 the absence of equitable relief, NEW WHEY NUTRITION will continue to create a substantial
24 risk of irreparable injury by continuing to cause consumers to be involuntarily and unwittingly
25 exposed to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS.

26 **PRAYER FOR RELIEF**

 Wherefore, PLAINTIFF accordingly prays for the following relief:

- A. A preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),

1 enjoining NEW WHEY NUTRITION, its agents, employees, assigns and all persons acting in
2 concert or participating with NEW WHEY NUTRITION, from distributing or selling the
3 PRODUCTS in California without first providing a clear and reasonable warning, within the
4 meaning of Proposition 65, that the users and/or handlers of the PRODUCTS are exposed to
5 the LISTED CHEMICAL;

6 B. An injunctive order, pursuant to H&S Code §25249.7(b), compelling
7 DEFENDANTS to identify and locate each individual who has purchased the PRODUCTS
8 since June 15, 2012, and to provide a warning to such person that the use of the PRODUCTS
9 will expose the user to chemicals known to birth defects and other reproductive harm;

10 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
11 against NEW WHEY NUTRITION in the amount of \$2,500 per day for each violation of
12 Proposition 65;

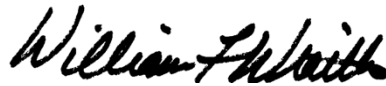
13 D. An award to PLAINTIFF of its reasonable attorney's fees and costs pursuant to
14 California Code of Civil Procedure §1021.5 or the substantial benefit theory;

15 E. An award of costs of suit herein; and

16 F. Such other and further relief as may be just and proper.

17
18 Dated: September 29, 2015

WRAITH LAW



19
20 By: _____

WILLIAM F. WRAITH
Attorney for Plaintiff
Environmental Research
Center

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EXHIBIT A

WRAITH LAW
24422 AVENIDA DE LA CARLOTA
SUITE 400
LAGUNA HILLS, CA 92653
Tel (949) 452-1234
Fax (949) 452-1102

June 15, 2015

**NOTICE OF VIOLATIONS OF
CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 ET SEQ.
(PROPOSITION 65)**

Dear Alleged Violator and the Appropriate Public Enforcement Agencies:

I represent Environmental Research Center, Inc. ("ERC"), 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. (619) 500-3090. ERC's Executive Director is Chris Heptinstall. 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.

ERC has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violator identified below failed to provide required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

General Information about Proposition 65. A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is attached with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

New Whey Nutrition, LLC

Consumer Products and Listed Chemical. The products that are the subject of this notice and the chemical in those products identified as exceeding allowable levels are:

New Whey Nutrition Multi-Pro Whey Isolate Blend Swiss Chocolate - Lead
New Whey Nutrition Multi-Pro Whey Isolate Blend Vanilla Cinnamon - Lead
New Whey Nutrition Bio Engineered Waximaize Fruit Punch – Lead
New Whey Nutrition Bio Engineered Waximaize Grape - 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.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

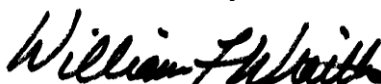
Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to this chemical has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

Approximate Time Period of Violations. Ongoing violations have occurred every day since at least June 15, 2012, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemical. The method of warning should be a warning that appears on the product label. The Violator violated Proposition 65 because it failed to provide persons handling and/or using these products with appropriate warnings that they are being exposed to this chemical.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violator to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemical, or provide appropriate warnings on the labels of these products; (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. Such a resolution will prevent further unwarned consumer exposures to the identified chemical, as well as an expensive and time consuming litigation.

ERC has retained me as legal counsel in connection with this matter. **Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.**

Sincerely,



William F. Wraith

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to New Whey Nutrition, LLC and its 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 New Whey Nutrition, LLC

I, William F. Wraith, declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

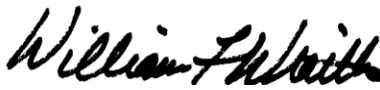
2. I am an attorney for the noticing party.

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 Violator 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: June 15, 2015



William F. Wraith

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 June 15, 2015, 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 at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current President or CEO
New Whey Nutrition, LLC
5707 Dot Com Court, Suite 1079
Oviedo, FL 32765

Corporation Service Company
(Registered Agent for New Whey
Nutrition, LLC)
2711 Centerville Road, Suite 400
Wilmington, DE 19808

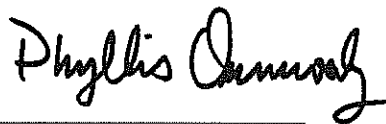
Corporation Service Company
(Registered Agent for New Whey
Nutrition, LLC)
1201 Hays Street
Tallahassee, FL 32301

On June 15, 2015, I verified 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)** were served on the following party when a true and correct copy thereof was uploaded 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 June 15, 2015, 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 at a U.S. Postal Service Office with the postage fully prepaid for delivery by Priority Mail.

Executed on June 15, 2015, in Fort Oglethorpe, Georgia.



Phyllis Dunwoody

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

June 15, 2015

Page 5

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 2nd 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., 3rd Floor
Redwood City, CA 94063

Los Angeles City Attorney's Office
City Hall East
200 N. Main Street, Suite 800
Los Angeles, CA 90012

District Attorney, Colusa County
346 Fifth Street Suite 101
Colusa, CA 95932

District Attorney, Merced County
550 W. Main Street
Merced, CA 95340

District Attorney, Santa Barbara County
1112 Santa Barbara Street
Santa Barbara, CA 93101

San Diego City Attorney's Office
1200 3rd Avenue, Ste 1620
San Diego, CA 92101

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

District Attorney, Del Norte County
450 H Street, Room 171
Crescent City, CA 95531

District Attorney, Mono County
Post Office Box 617
Bridgeport, CA 93517

District Attorney, Santa Cruz County
701 Ocean Street, Room 200
Santa Cruz, CA 95060

San Jose City Attorney's Office
200 East Santa Clara Street,
16th Floor
San Jose, CA 95113

District Attorney, El Dorado County
515 Main Street
Placerville, CA 95667

District Attorney, Monterey County
Post Office Box 1131
Salinas, CA 93902

District Attorney, Shasta County
1355 West Street
Redding, CA 96001

District Attorney, Fresno County
2220 Tulare Street, Suite 1000
Fresno, CA 93721

District Attorney, Napa County
931 Parkway Mall
Napa, CA 94559

District Attorney, Sierra County
PO Box 457
Downieville, CA 95936

District Attorney, Glenn County
Post Office Box 430
Willows, CA 95988

District Attorney, Nevada County
201 Commercial Street
Nevada City, CA 95959

District Attorney, Siskiyou County
Post Office Box 986
Yreka, CA 96097

District Attorney, Humboldt County
825 5th Street 4th 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

District Attorney, Imperial County
940 West Main Street, Ste 102
El Centro, CA 92243

District Attorney, Placer County
10810 Justice Center Drive, Ste 240
Roseville, CA 95678

District Attorney, Sonoma County
600 Administration Drive,
Room 212J
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