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1 Counsel for Plaintiff, ECOLOGICAL RIGHTS FOUNDATION

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN FRANCISCO

12 ECOLOGICAL RIGHTS FOUNDATION,
13 Plaintiff,
14 v.
15 ORGILL, INC., PICNIC TIME, INC., M.S.R.S.,
16 INC., (dba VM INTERNATIONAL),
17 NORTHERN TOOL & EQUIPMENT
18 COMPANY, INC., P&M PRODUCTS, INC., OLD
19 SMOKEY PRODUCTS CO., SIYA, INC.,
20 Defendants.

Case No. CGC -16-555429

COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES
Health & Safety Code § 25249.5 et seq.
(Other)

ENDORSED
FILED
Superior Court of California
County of San Francisco

NOV 17 2016

CLERK OF THE COURT
BY: ARLENE RAMOS
Deputy Clerk

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2 Plaintiff, Ecological Rights Foundation, in the public interest, based on information and
3 belief, and knowledge and investigation of counsel alleges as follows:

4 **INTRODUCTION**

5 1. This Complaint seeks civil penalties and an injunction against Orgill, Inc.; Picnic Time, Inc.;
6 M.S.R.S., Inc. (dba VM International); Northern Tool & Equipment Company, Inc.; P&M Products,
7 Inc.; Old Smokey Products Co.; and Siya, Inc. (“Defendants”) to remedy Defendants’ continuing
8 failure to warn individuals in California about exposures to carbon monoxide, a chemical known to
9 the State of California to cause reproductive toxicity. Such exposures have occurred and continue to
10 occur, through the use of charcoal grills and hibachis that Defendants manufacture, distribute and/or
11 sell in the State (“Products”). These Products are intended to be used with charcoal and are used for
12 cooking. The combustion of charcoal in charcoal grills and hibachis causes carbon monoxide to be
13 released into the air. People using charcoal grills and hibachis, and those standing near the Products
14 when they are in use, inhale the released carbon monoxide.

15 2. Under California’s Proposition 65, California Health & Safety Code § 25249.5, *et seq.*, it is
16 unlawful for businesses to knowingly and intentionally expose individuals in California to chemicals
17 known to the State to cause cancer, birth defects, or other reproductive harm without providing clear
18 and reasonable warnings to individuals prior to their exposure. Defendants introduce charcoal grills
19 and hibachis into the California marketplace, exposing users of the Products, including pregnant
20 women, to carbon monoxide. Despite the fact that Defendants expose pregnant women and other
21 consumers and individuals to carbon monoxide, Defendants provide no warnings about the
22 reproductive hazards associated with such exposures. Defendants’ conduct thus violates the warning
23 provision of Proposition 65. Health & Safety Code § 25249.6.

24 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7 to compel
25 Defendants to bring their business practices into compliance with Proposition 65 by providing a clear
26 and reasonable warning to each individual who has been and who in the future may be exposed to
27 carbon monoxide in the ways set forth above. Plaintiff seeks an order that Defendants identify and
28 locate each individual person to whom the Defendants conveyed Products during the past three years

1 and to provide to each such individual, as well as new purchasers and Product users, a clear and
2 reasonable warning that use of the Products causes exposures to a chemical known to cause birth
3 defects and other reproductive harm.

4 4. In addition to injunctive relief, Plaintiff seeks civil penalties to remedy Defendants' failure
5 to provide clear and reasonable warnings regarding exposure to a chemical known to cause birth
6 defects and other reproductive harm.

7 PARTIES

8 5. Plaintiff, Ecological Rights Foundation ("EcoRights") is a non-profit public benefit
9 organization dedicated to, among other causes, protecting California residents from toxic exposures,
10 environmental and human health education, and consumer rights. Ecological Rights Foundation is
11 incorporated under the laws of the State of California and is a "person" pursuant to Health & Safety
12 Code §25249.11(a). EcoRights brings this enforcement action in the public interest pursuant to
13 Health & Safety Code §25249.7(d).

14 6. Orgill, Inc. is a person in the course of doing business within the meaning of Health & Safety
15 Code §25249.11(b). Orgill, Inc. markets, distributes, and/or sells the Products for sale and use in the
16 State of California.

17 7. Picnic Time, Inc. is a person in the course of doing business within the meaning of Health &
18 Safety Code §25249.11(b). Picnic Time, Inc. markets, distributes, and/or sells the Products for sale
19 and use in the State of California.

20 8. M.S.R.S., Inc., dba VM International, is a person in the course of doing business within the
21 meaning of Health & Safety Code §25249.11(b). M.S.R.S., Inc., dba VM International markets,
22 distributes, and/or sells the Products for sale and use in the State of California.

23 9. Northern Tool & Equipment Company, Inc. is a person in the course of doing business within
24 the meaning of Health & Safety Code §25249.11(b). Northern Tool & Equipment Company, Inc.
25 markets, distributes, and/or sells the Products for sale and use in the State of California.

26 10. P&M Products, Inc. is a person in the course of doing business within the meaning of Health
27 & Safety Code §25249.11(b). P&M Products, Inc. markets, distributes, and/or sells the Products for
28 sale and use in the State of California.

1 11. Old Smokey Products Co. is a person in the course of doing business within the meaning of
2 Health & Safety Code §25249.11(b). Old Smokey Products Co. markets, distributes, and/or sells the
3 Products for sale and use in the State of California.

4 12. Siya, Inc. is a person in the course of doing business within the meaning of Health & Safety
5 Code §25249.11(b). Siya, Inc. markets, distributes, and/or sells the Products for sale and use in the
6 State of California.

7 13. Each Defendant employs more than ten people.

8 JURISDICTION

9 14. The Court has jurisdiction over this action pursuant to California Health & Safety Code
10 Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court "original
11 jurisdiction in all causes except those given by statute to other trial courts." Chapter 6.6 of the
12 Health & Safety Code, which contains the statutes under which this action is brought, does not
13 grant jurisdiction to any other trial court.

14 15. This Court also has jurisdiction over Defendants because they are businesses that have
15 sufficient minimum contacts in California and within the County of San Francisco. Defendants
16 intentionally availed themselves of the California and San Francisco County markets. It is thus
17 consistent with traditional notions of fair play and substantial justice for the San Francisco County
18 Superior Court to exercise jurisdiction over Defendants.

19 16. Venue is proper in San Francisco County Superior Court because one or more of the
20 violations arise in the County of San Francisco.

21 BACKGROUND

22 17. The People of the State of California have declared by initiative under Proposition 65 their
23 right "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
24 reproductive harm." Proposition 65, § 1(b). To effectuate this goal, Proposition 65 prohibits exposing
25 people to chemicals listed by the State of California as known to cause cancer, birth defects, or other
26 reproductive harm without a "clear and reasonable warning" unless the business responsible for the
27 exposure can prove that it fits within a statutory exemption. Health & Safety Code Section 25249.6
28 states, in pertinent part:

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

5 18. On July 1, 1989, the State of California officially listed carbon monoxide as a chemical
6 known to cause developmental reproductive toxicity, which means harm to the developing fetus. On
7 July 1, 1990, carbon monoxide exposures became subject to the clear and reasonable warning
8 requirements under Proposition 65. 27 C.C.R. § 27001(b); Health & Safety Code Section
9 25249.10(b).

10 19. Plaintiff brings this enforcement action against Defendants pursuant to Health & Safety
11 Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of the Notice of
12 Violation dated September 12, 2016, which on that date EcoRights sent to California's Attorney
13 General, every county District Attorney in California, and to the City Attorneys of every California
14 City with a population greater than 750,000. On the same day, Plaintiff sent a substantively identical
15 letter to each Defendant. In compliance with Health & Safety Code § 25249.7(d) and 27 C.C.R. §
16 25903(b), each of the Notices included the following information: (1) the name and address of each
17 violator; (2) the statute violated; (3) the time period during which violations occurred; (4) specific
18 descriptions of the violations, including (a) the routes of exposure to carbon monoxide from the
19 Products, and (b) the specific type of Products sold and used in violation of Proposition 65; and (5)
20 the name of the specific Proposition 65-listed chemical that is the subject of the violations described
21 in each Notice.

22 20. Attached to each of the Notices of Violation sent to the Defendants was a summary of
23 Proposition 65 that was prepared by California's Office of Environmental Health Hazard
24 Assessment. In addition, the Notices of Violation were accompanied by a Certificate of Service
25 attesting to the service of the Notice of Violation on each entity which received it. Pursuant to Health
26 & Safety Code Section 25249.7(d) and 11 C.C.R. § 3101, Plaintiff also sent a Certificate of Merit
27 with the Notices of Violation attesting to the reasonable and meritorious basis for the action. Plaintiff
28 enclosed factual information sufficient to establish the basis of the Certificate of Merit with the
Notice of Violation letters sent to the Attorney General.

21. None of the public prosecutors with the authority to prosecute violations of Proposition 65

1 has commenced and/or is diligently prosecuting a cause of action against Defendants under Health
2 & Safety Code Section 25249.5 *et seq.*, based on the claims asserted in EcoRights' Notices.

3 22. Defendants both know and intend that individuals, including pregnant women, will use the
4 Products for cooking, thus exposing them to carbon monoxide. Under Proposition 65, an exposure
5 is "knowing" where the party responsible for such exposure has "knowledge of the fact that a[n] . . .
6 exposure to a chemical listed pursuant to [Health & Safety Code § 25249.8(a)] is occurring. No
7 knowledge that . . . exposure is unlawful is required." 27 C.C.R. § 25102(n). This knowledge may
8 be either actual or constructive. *See, e.g.*, Final Statement of Reasons Revised (November 4, 1988)
9 (pursuant to former 22 C.C.R. Division 2, § 12201). Defendants have been informed of the carbon
10 monoxide exposures caused by the use of Products by the 60-Day Notice of Violation, and the
11 accompanying Certificate of Merit served on them by EcoRights. Defendants also have constructive
12 knowledge of the carbon monoxide exposures caused by Products. As companies that manufacture,
13 market, distribute and/or sell the Products for use in the State of California, Defendants know or
14 should know that carbon monoxide exposures to users of the Products are a natural and foreseeable
15 consequence of Defendants' placing the Products into the stream of commerce.

16 23. Any person "violating or threatening to violate" Proposition 65 may be enjoined in any
17 court of competent jurisdiction. Health & Safety Code § 25249.7. "Threaten to violate" is defined to
18 mean "to create a condition in which there is a substantial probability that a violation will occur."
19 Health & Safety Code § 25249.11(e). Proposition 65 provides for civil penalties not to exceed \$2,500
20 per day for each violation of the statute.

21 24. EcoRights has engaged in good faith efforts to resolve the claims alleged herein prior to
22 filing this complaint.

23 **FIRST CAUSE OF ACTION**

24 **(Violations of Health & Safety Code §25249.6)**

25 25. EcoRights realleges and incorporates the facts and allegations contained in the above
26 paragraphs as though specifically set forth herein.

27 26. Each defendant is a person in the course of doing business within the meaning of Health &
28 Safety Code § 25249.11(b) who, by manufacturing, marketing, distribution, sale or otherwise placing

1 the Products into the stream of commerce, violated, violates or threatens to violate Proposition 65.

2 27. Carbon monoxide is a chemical listed by the State of California as known to cause
3 developmental reproductive toxicity.

4 28. Defendants know that the average use of the Products will expose users of the Products to
5 carbon monoxide. Defendants intend that the Products be used in a manner that results in exposures
6 to carbon monoxide.

7 29. Defendants have failed and continue to fail, to provide clear and reasonable warnings
8 regarding the reproductive toxicity of carbon monoxide to users of the Products.

9 30. Since at least three years prior to the Notice of Violation Letters, Defendants have violated
10 Proposition 65 by knowingly and intentionally exposing individuals to carbon monoxide without
11 first giving clear and reasonable warnings to such individuals regarding the reproductive toxicity of
12 carbon monoxide.

13 **PRAYER FOR RELIEF**

14 Wherefore, Plaintiff prays for judgment against Defendants as follows:

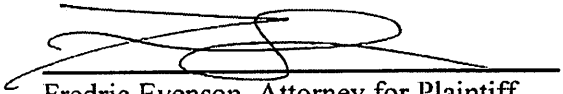
- 15 1. Pursuant to the First Cause of Action, that Defendants be enjoined, restrained, and
16 ordered to comply with the provisions of Section 25249.6 of the California Health &
17 Safety Code;
- 18 2. That each Defendant be ordered to make best efforts to identify and locate each
19 individual in California to whom it, or its customers or agents, distributed or sold
20 Products during the past three years, and to provide a warning to each such person
21 that use of the Product will expose that person to a chemical known to cause birth
22 defects and other reproductive harm;
- 23 3. That each Defendant be assessed a civil penalty in an amount equal to \$2,500.00 per
24 day per individual exposed to carbon monoxide in violation of Section 25249.6 of the
25 California Health & Safety Code, as the result of Defendants' marketing, distributing,
26 and/or selling the Products for use in California.
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- 4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to Plaintiff the attorneys' fees and costs it incurred in bringing this enforcement action; and
- 5. For such other relief as this court deems just and proper.

Dated: November 16, 2016

ECOLOGY LAW CENTER



Fredric Evenson, Attorney for Plaintiff
ECOLOGICAL RIGHTS FOUNDATION

ECOLOGY LAW CENTER
P.O. Box 1000
SANTA CRUZ, CALIFORNIA 95061
TELEPHONE: (831) 454-8216
EMAIL: EVENSON@ECOLOGYLAW.COM

SEPTEMBER 12, 2016

NOTICE OF VIOLATIONS
CALIFORNIA SAFE DRINKING WATER AND
TOXIC ENFORCEMENT ACT

Proposition 65 Enforcement Reporting
Attn: Prop 65 Coordinator
1515 Clay Street
P.O. Box 70550
Oakland, CA 94612

AND THE PUBLIC PROSECUTORS LISTED ON THE DISTRIBUTION LIST
ACCOMPANYING THE ATTACHED CERTIFICATE OF SERVICE

Re: Violations of Proposition 65 Concerning Carbon Monoxide Exposures from
Charcoal Grills and Hibachis

In accord with California Health & Safety Code § 25249.7, the Ecological Rights Foundation ("ERF") hereby gives you notice that the companies listed on the attached Exhibit A have violated and are in ongoing violation of California Health & Safety Code § 25249.6, which provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual."

Pursuant to California Health & Safety Code § 25249.7, ERF intends to bring an enforcement action 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify the violations discussed in this notice letter. The public enforcement agencies that have been served with copies of this notice of violations are identified with the attached Certificate of Service.

The above-referenced violations occur when California residents use charcoal grills and hibachis. These products are used primarily for cooking. Combustion of charcoal produces and exposes people to **carbon monoxide**, a chemical known to the State of California to cause reproductive toxicity. Because the combustion of charcoal causes carbon monoxide to be released into the air, people using charcoal grills and hibachis, and others standing near the products when charcoal is burning in or on the products, inhale carbon monoxide. Exposure to carbon monoxide is via the inhalation route. These products cause carbon monoxide exposures to occur in peoples yards, at parks and beaches, and everywhere else throughout California where the products are used. These violations are alleged for consumer and environmental exposures.

Included on Exhibit A is a non-exclusive list of examples of the types of products manufactured, marketed or sold by the Noticed Parties in the State of California. Though specific models or SKU or product numbers are given as examples, this Notice pertains to all models, and all variations, of the specific type of product (charcoal grills and hibachis) of which the named model is an example.

The noticed parties on Exhibit A, and on the attached Certificate of Service, did not and do not provide people with clear and reasonable warnings before exposing those people to carbon monoxide.

The above-referenced violations have occurred every day since at least September 12, 2013 and will continue every day until clear and reasonable warnings are given.

ERF is a California non-profit corporation dedicated to protecting human and environmental health, including raising awareness of, and reducing exposures to, toxic chemicals. The following individual is the responsible individual within ERF for purposes of this Notice:

James Lamport, Executive Director
Ecological Rights Foundation
867 B Redwood Drive
Garberville, California 95542
Telephone: (707) 923-4372

ERF has retained the following counsel to represent them in this matter (please direct communications to counsel):

Fredric Evenson
Ecology Law Center
P.O. Box 1000
Santa Cruz, California 95061
Telephone: (831) 454-8216
Email: evenson@ecologylaw.com

Sincerely,



Fredric Evenson

Exhibit 1
September 12, 2016 Notice of Violation
Carbon Monoxide Exposures from Charcoal Grills and Hibachis

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products*	Item#, UPC or SKU # or Further Description
<p>Gustavo F. Cosaro Agent for Service of Process Picnic Time, Inc. 5131 Maureen Lane Moorpark, CA 93021</p>	<p>X-Grill, Portable Charcoal Grill</p>	
<p>President or CEO Orgill, Inc. 3742 Tyndale Drive Memphis, TN 38125</p> <p>Orgill, Inc. C T Corporation System 400 E Court Ave. Des Moines, IA 50309</p>	<p>Omaha 22.5" Kettle Charcoal Grill</p>	<p>SKU# 825-3551</p>
<p>Moe Vazin, President M.S.R.S., Inc. Dba VM International 1245 E. Watson Center Rd. Carson, CA 90745</p>	<p>VMI Outdoor Living 14" Portable Charcoal Barbecue Kettle</p>	
<p>Charles Albrecht Northern Tool & Equipment Company, Inc. 2800 Southcross Drive West Burnsville, MN 55306</p> <p>Charles Albrecht, President Northern Tool & Equipment Company, Inc. P.O. Box 1219 Burnsville, MN 55337</p>	<p>Pilot Rock Park-Style Grills</p>	<p>Item Nos. 42579, 23579, 44642, 304555</p>

<p>President or CEO P&M Products, Inc. 345 118th Ave SE Suite 200 Bellevue, WA 98005</p> <p>Phillip Swann Agent for Service of Process P&M Products, Inc. 6619 132nd Ave. NE, Suite 206 Kirkland, WA 98033</p>	<p>EZ Grill, Portable Charcoal Grill</p>	
<p>President or CEO Old Smokey Products Co. 1620 Maury Street Houston, TX 77026</p> <p>President or CEO Old Smokey Products Co. P.O. Box 4 Houston, TX 77001</p>	<p>Old Smokey Charcoal Barbecue Grills (#14 small; #18 medium; #22 jumbo)</p>	
<p>Sudhir Mundhra Agent for Service of Process Siya, Inc. 10233 Palm Drive Santa Fe Springs, CA 90670</p>	<p>SE Portable Folding Barbecue Grill</p>	<p>Item No. BG107</p>
<p>President or CEO Rankam Metal Products Manufactory, Ltd. 1618 W Rosencrans Ave Gardena, CA 90249</p> <p>President or CEO Rankam Metal Products Manufactory, Ltd. 1322 Rankin Drive Troy, Michigan 48083-2826</p>	<p>RiverGrille "Stampede" 37.5 Inch Grill</p> <p>RiverGrille "Cattleman" Charcoal Grills and Smokers</p> <p>RiverGrille "Farmer's" Charcoal Grills and Smokers</p>	<p>Item No. 718040</p>

* These non-exclusive examples of the category or type of product that is subject to this Notice is for the recipient's benefit in its investigation of ERF's allegations. These examples are not meant to be an exhaustive or comprehensive identification of each specific offending product of the category or type of products subject to this notice. It is ERF's position that the alleged Violator is obligated to conduct a good faith investigation into other specific products within the identified category or type that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the past three years, to ensure that clear and reasonable warnings are provided to California citizens prior to purchase, or retroactively if necessary.

Certificate of Merit
Health & Safety Code Section 25249.7(d)

I, Fredric Evenson, hereby declare:

(1) This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 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 the 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 the information identified in Health and Safety Code section 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.

Date: September 12, 2016

By:


Fredric Evenson

CERTIFICATE OF SERVICE

I am over the age of 18. My business address is P.O. Box 1000, Santa Cruz, CA 95061.

On September 12, 2016 I served the following:

- 1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act
- 2) Certificate of Merit: Health and Safety Code Section 25249.7(d)
- 3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary
- 4) Certificate of Service

by enclosing copies of the same in a sealed envelope addressed to each person shown below and depositing the envelope in the U.S. mail with postage fully prepaid for delivery by Certified Mail. Place of mailing: Santa Cruz, CA.

See attached: **Service List-Noticed Parties**

On September 12, 2016 I also served the following:

- 1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act
- 2) Certificate of Merit: Health and Safety Code Section 25249.7(d)
- 3) Certificate of Merit (Attorney General Copy): Factual information sufficient to establish the basis of the Certificate of Merit (only sent to Attorney General)
- 4) Certificate of Service

by uploading the documents to the California Attorney General's Proposition 65 Enforcement Database and by enclosing copies of the same in sealed envelopes addressed to each of the public enforcement agencies listed on the attached Service List, and depositing the envelopes in the U.S. mail with postage fully prepaid for delivery by First Class Mail. Place of mailing: Santa Cruz, CA.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed September 12, 2016, at Santa Cruz, CA.


Fredric Evenson

Service List – Noticed Parties

<p>Gustavo F. Cosaro Agent for Service of Process Picnic Time, Inc. 5131 Maureen Lane Moorpark, CA 93021</p>	<p>President or CEO Orgill, Inc. 3742 Tyndale Drive Memphis, TN 38125</p>	<p>Orgill, Inc. C T Corporation System 400 E Court Ave. Des Moines, IA 50309</p>
<p>Moe Vazin, President M.S.R.S., Inc. Dba VM International 1245 E. Watson Center Rd. Carson, CA 90745</p>	<p>Charles Albrecht Northern Tool & Equipment Company, Inc. 2800 Southcross Drive West Burnsville, MN 55306</p>	<p>Charles Albrecht, President Northern Tool & Equipment Company, Inc. P.O. Box 1219 Burnsville, MN 55337</p>
<p>President or CEO P&M Products, Inc. 345 118th Ave SE Suite 200 Bellevue, WA 98005</p>	<p>Phillip Swann Agent for Service of Process P&M Products, Inc. 6619 132nd Ave. NE, Suite 206 Kirkland, WA 98033</p>	<p>President or CEO Old Smokey Products Co. 1620 Maury Street Houston, TX 77026</p>
<p>President or CEO Old Smokey Products Co. P.O. Box 4 Houston, TX 77001</p>	<p>Sudhir Mundhra Agent for Service of Process Siya, Inc. 10233 Palm Drive Santa Fe Springs, CA 90670</p>	<p>President or CEO Rankam Metal Products Manufactory, Ltd. 1618 W Rosencrans Ave Gardena, CA 90249</p>
<p>President or CEO Rankam Metal Products Manufactory, Ltd. 1322 Rankin Drive Troy, Michigan 48083-2826</p>		

Service List – Public Enforcers

Office of the District Attorney Alameda County 1225 Fallon Street, Room 900 Oakland, CA 94612	Office of the District Attorney Lassen County 220 S. Lassen Street, Suite 8 Susanville, CA 96130	Office of the District Attorney San Benito County 419 4th Street Hollister, CA 95023	Office of the District Attorney Tehama County P.O. Box 519 Red Bluff, CA 96080
Office of the District Attorney Alpine County P.O. Box 248 Markleeville, CA 96120	Office of the District Attorney Los Angeles County 211 W. Temple Street, Suite 1200 Los Angeles, CA 90012	Office of the District Attorney San Bernardino County 303 W. Third Street San Bernardino, CA 92415	Office of the District Attorney Trinity County P.O. Box 310 Weaverville, CA 96093
Office of the District Attorney Amador County 708 Court Street, #202 Jackson, CA 95642	Office of the District Attorney Madera County 209 West Yosemite Avenue Madera, CA 93637	Office of the District Attorney San Diego County 330 W. Broadway, Suite 1300 San Diego, CA 92101	Office of the District Attorney Tulare County 221 South Mooney Blvd., Suite 224 Visalia, CA 93291
Office of the District Attorney Butte County 25 County Center Drive Oroville, CA 95965	Office of the District Attorney Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	Office of the District Attorney San Francisco County 850 Bryant Street, #322 San Francisco, CA 94103	Office of the District Attorney Tuolumne County 423 N. Washington Street Sonora, CA 95370
Office of the District Attorney Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	Office of the District Attorney Mariposa County P.O. Box 730 Mariposa, CA 95338	Office of the District Attorney San Joaquin County 222 East Weber Ave., #202 Stockton, CA 95202	Office of the District Attorney Ventura County 800 South Victoria Avenue Ventura, CA 93009
Office of the District Attorney Colusa County 346 5th Street, Suite 101 Colusa, CA 95932	Office of the District Attorney Mendocino County P.O. Box 1000 Ukiah, CA 95482	Office of the District Attorney San Luis Obispo County County Govt. Center, #450 San Luis Obispo, CA 93408	Office of the District Attorney Yolo County 301 Second Street Woodland, CA 95695
Office of the District Attorney Contra Costa County 900 Ward Street Martinez, CA 94553	Office of the District Attorney Merced County 550 West Main Street Merced, CA 95340	Office of the District Attorney San Mateo County 400 County Center, Third Floor Redwood City, CA 94063	Office of the District Attorney Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
Office of the District Attorney Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	Office of the District Attorney Modoc County 204 S. Court Street Room 202 Alturas, CA 96101	Office of the District Attorney Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	Oakland City Attorney City Hall, 6th Floor 1 Frank Ogawa Plaza Oakland, California 94612
Office of the District Attorney El Dorado County 515 Main Street Placerville, CA 95667	Office of the District Attorney Mono County P.O. Box 617 Bridgeport, CA 93517	Office of the District Attorney Santa Clara County 70 West Hedding Street San Jose, CA 95110	Office of the City Attorney City of San Francisco City Hall, Room 234 1 Dr. Carlton B. Goodlett Pl. San Francisco, CA 94102
Office of the District Attorney Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	Office of the District Attorney Monterey County P.O. Box 1131 Salinas, CA 93902	Office of the District Attorney Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	Office of the City Attorney City of Sacramento 915 I Street, 4th Floor Sacramento, CA 95814
Office of the District Attorney Glenn County P.O. Box 430 Willows, CA 95988	Office of the District Attorney Napa County P.O. Box 720 Napa, CA 94559	Office of the District Attorney Shasta County 1355 West Street Redding, CA 96001	Office of the City Attorney City of San Jose 200 E. Santa Clara St. San Jose, CA 95113
Office of the District Attorney Humboldt County 825 5th Street, 4 th Floor Eureka, CA 95501	Office of the District Attorney Nevada County 201 Commercial Street Nevada City, CA 95959	Office of the District Attorney Sierra County P.O. Box 457 Downieville, CA 95936	Office of the City Attorney City of Los Angeles 200 N. Main Street, Suite 800 Los Angeles, CA 90012
Office of the District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243	Office of the District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701	Office of the District Attorney Siskiyou County P.O. Box 986 Yreka, CA 96097	Office of the City Attorney City of San Diego 1200 Third Ave., Suite 1620 San Diego, CA 92101
Office of the District Attorney Inyo County P.O. Box D Independence, CA 93526	Office of the District Attorney Placer County 10810 Justice Center Drive Roseville, CA 95678	Office of the District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield, CA 94533	Proposition 65 Enforcement Reporting Attn: Prop 65 Coordinator 1515 Clay Street P.O. Box 70550 Oakland, CA 94612
Office of the District Attorney Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	Office of the District Attorney Plumas County 520 Main Street, Room 404 Quincy, CA 95971	Office of the District Attorney Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
Office of the District Attorney Kings County 1400 West Lacey Blvd. Hanford, CA 93230	Office of the District Attorney Riverside County 3960 Orange Street Riverside, CA 92501	Office of the District Attorney Stanislaus County 832 12th Street, Suite 300 Modesto, CA 95354	
Office of the District Attorney Lake County 255 N. Forbes Street Lakeport, CA 95453	Office of the District Attorney Sacramento County 901 G Street Sacramento, CA 95814	Office of the District Attorney Sutter County 446 Second Street, Suite 102 Yuba City, CA 95991	