

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

05/19/2022 at 05:24:17 PM

By: Cheryl Clark, Deputy Clerk

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6 Santa Cruz, California 95061
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8 Counsel for Plaintiff
9 ECOLOGICAL RIGHTS FOUNDATION

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF ALAMEDA

12 ECOLOGICAL RIGHTS FOUNDATION,

13 Plaintiff,

14 v.

15 AMAZON.COM INC., and DOES 1 through 20,
inclusive

16 Defendant.

Case No. **22CV011540**

COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES

Health & Safety Code § 25249.5 et seq.

(Other)

17 Plaintiff, Ecological Rights Foundation, in the public interest, based on information
18 and belief, and knowledge and investigation of counsel allege as follows:

19 **INTRODUCTION**

20 1. This Complaint seeks civil penalties and an injunction against AMAZON.COM INC.
21 (“Defendant”) to remedy continuing failure to warn individuals in California about exposures to
22 styrene, a chemical known to the State of California to cause cancer. Such exposures have occurred
23 and continue to occur, through the use of 3D pens that Defendant manufactures, distributes,
24 markets and/or sells in the State (“Products”). These Products are intended to be used with
25 filaments incorporating a styrene monomer.

26 2. When people use 3D pens with filaments incorporating a styrene monomer, the 3d pens
27 heat these filaments and thus release styrene into the air. People using the 3D pens with filaments
28

1 incorporating a styrene monomer, and others standing in the same room, inhale styrene in the
2 normal course of use.

3 3. Under California’s Proposition 65, California Health & Safety Code § 25249.5, *et seq.*, it is
4 unlawful for businesses to knowingly and intentionally expose individuals in California to
5 chemicals known to the State to cause cancer, birth defects, or other reproductive harm without
6 providing clear and reasonable warnings to individuals prior to their exposure. Defendant
7 introduces filaments incorporating a styrene monomer into the California marketplace, exposing
8 users of the Products to styrene. Despite the fact that Defendant exposes consumers and individuals
9 to styrene, Defendant provides no warnings about the carcinogenic risks associated with such
10 exposures. Defendant’s conduct thus violates the warning provision of Proposition 65. Health &
11 Safety Code § 25249.6.

12 4. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7 to
13 compel Defendant to bring its business practices into compliance with Proposition 65 by providing
14 a clear and reasonable warning to each individual who has been and who in the future may be
15 exposed to styrene in the ways set forth above. Plaintiff seeks an order that Defendant identifies
16 and locates each individual person to whom the Defendant conveyed Products during the past three
17 years and to provide to each such individual, as well as new purchasers and Product users, a clear
18 and reasonable warning that use of the Products causes exposures to a chemical known to cause
19 cancer.

20 5. In addition to injunctive relief, Plaintiff seeks civil penalties to remedy Defendant’s failure
21 to provide clear and reasonable warnings regarding exposure to a chemical known to cause cancer.

22 **PARTIES**

23 6. Plaintiff, Ecological Rights Foundation (“EcoRights”) is a non-profit public benefit
24 organization dedicated to, among other causes, protecting California residents from toxic
25 exposures, environmental and human health education, and consumer rights. Ecological Rights
26 Foundation is incorporated under the laws of the State of California and is a "person" pursuant to
27 Health & Safety Code §25249.11(a). EcoRights brings this enforcement action in the public
28 interest pursuant to Health & Safety Code §25249.7(d).

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

4 8. Plaintiff is unaware of the true names and capacities of Defendants DOES 1 through 20,
5 inclusive, and therefore sue said Defendants under fictitious names. Plaintiff will amend its
6 petition and complaint to show the true names and capacities of Does 1 through 20 when the same
7 have been ascertained. Each of the Defendants is the agent and/or employee of each other
8 Defendants, and each performed acts on which this action is based within the course and scope of
9 such Defendants' agency and/or employment. Plaintiff is informed and believe and therefore allege
10 that each of the Defendants are legally responsible in some manner for the events and happenings
11 referred to herein.

12 **JURISDICTION**

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

18 10. This Court also has jurisdiction over Defendant because Defendant's business has
19 sufficient minimum contacts in California and within the County of Alameda. Defendant
20 intentionally availed itself of the California and Alameda County markets. It is thus consistent with
21 traditional notions of fair play and substantial justice for the Alameda County Superior Court to
22 exercise jurisdiction over Defendant.

23 11. Venue is proper in Alameda County Superior Court because one or more of the violations
24 arise in the County of Alameda.

25 **BACKGROUND**

26 12. The People of the State of California have declared by initiative under Proposition 65 their
27 right "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
28 reproductive harm." Proposition 65, § 1(b). To effectuate this goal, Proposition 65 prohibits

1 exposing people to chemicals listed by the State of California as known to cause cancer, birth
2 defects, or other reproductive harm without a “clear and reasonable warning” unless the business
3 responsible for the exposure can prove that it fits within a statutory exemption. Health & Safety
4 Code Section 25249.6 states, in pertinent part:

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

9 13. On April 22, 2016, the State of California officially listed styrene as a chemical known to
10 cause cancer. On April 22, 2017, styrene exposures became subject to the clear and reasonable
11 warning requirements under Proposition 65. 27 C.C.R. § 27001(b); Health & Safety Code Section
12 25249.10(b).

13 14. Plaintiff brings this enforcement action against Defendant pursuant to Health & Safety
14 Code Section 25249.7(d). Attached hereto and incorporated by reference are copies of the Notice
15 of Violation dated April 24, 2019, the date on which EcoRights sent to California's Attorney
16 General, every county District Attorney in California, and to the City Attorneys of every California
17 City with a population greater than 750,000. On the same day, Plaintiff sent a substantively
18 identical letter to Defendant. In compliance with Health & Safety Code § 25249.7(d) and 27
19 C.C.R. § 25903(b), each of the Notices included the following information: (1) the name and
20 address of each violator; (2) the statute violated; (3) the time period during which violations
21 occurred; (4) specific descriptions of the violations, including (a) the routes of exposure to styrene
22 from the Products, and (b) specific examples of Products sold and used in violation of Proposition
23 65; and (5) the name of the specific Proposition 65-listed chemical that is the subject of the
24 violations described in each Notice.

25 15. Accompanying the Notices of Violation sent to the Defendant was a summary of
26 Proposition 65 that was prepared by California’s Office of Environmental Health Hazard
27 Assessment. In addition, the Notices of Violation were accompanied by a Certificate of Service
28 attesting to the service of the Notice of Violation on each entity which received it. Pursuant to
29 Health & Safety Code Section 25249.7(d) and 11 C.C.R. § 3101, Plaintiff also sent a Certificate of

1 Merit with the Notices of Violation attesting to the reasonable and meritorious basis for the action.
2 Plaintiff enclosed factual information sufficient to establish the basis of the Certificate of Merit
3 with the Notice of Violation letters sent to the Attorney General.

4 16. None of the public prosecutors with the authority to prosecute violations of Proposition 65
5 has commenced and/or is diligently prosecuting a cause of action against Defendant under Health
6 & Safety Code Section 25249.5 *et seq.*, based on the claims asserted in EcoRights' Notices.

7 17. Defendant knows and intends that individuals will use the Products in the operation of 3D
8 printers and 3D pens, thus exposing them to styrene. Under Proposition 65, an exposure is
9 "knowing" where the party responsible for such exposure has "knowledge of the fact that a[n] . . .
10 exposure to a chemical listed pursuant to [Health & Safety Code § 25249.8(a)] is occurring. No
11 knowledge that . . . exposure is unlawful is required." 27 C.C.R. § 25102(n). This knowledge may
12 be either actual or constructive. *See, e.g.*, Final Statement of Reasons Revised (November 4, 1988)
13 (pursuant to former 22 C.C.R. Division 2, § 12201). Defendant has been informed of the styrene
14 exposures caused by the use of Products by the 60-Day Notice of Violation, and the accompanying
15 Certificate of Merit served on them by EcoRights. Defendant also has constructive knowledge of
16 the styrene exposures caused by Products. As a company that manufactures, markets, distributes
17 and/or sells the Products for use in the State of California, Defendant knows or should know that
18 styrene exposures to users of the Products are a natural and foreseeable consequence of
19 Defendant's placing the Products into the stream of commerce.

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

25 19. EcoRights has engaged in good faith efforts to resolve the claims alleged herein prior to
26 filing this complaint.

27 **FIRST CAUSE OF ACTION**

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

1 20. EcoRights realleges and incorporates the facts and allegations contained in the above
2 paragraphs as though specifically set forth herein.

3 21. Defendant is a person in the course of doing business within the meaning of Health &
4 Safety Code § 25249.11(b) who, by manufacturing, marketing, distribution, sale or otherwise
5 placing the Products into the stream of commerce, violated, violates or threatens to violate
6 Proposition 65.

7 22. Styrene is a chemical listed by the State of California as known to cause cancer.

8 23. Defendant knows that the average use of the Products will expose users of the Products to
9 styrene. Defendant intends that the Products be used in a manner that results in exposures to
10 styrene.

11 24. Defendant has failed and continue to fail, to provide clear and reasonable warnings
12 regarding the carcinogenicity of styrene to users of the Products.

13 25. Since at least three years prior to the Notice of Violation Letters, Defendant has violated
14 Proposition 65 by knowingly and intentionally exposing individuals to styrene without first giving
15 clear and reasonable warnings to such individuals regarding the carcinogenicity of styrene.

16 **PRAYER FOR RELIEF**

17 Wherefore, Plaintiff prays for judgment against Defendant as follows:

- 18 1. Pursuant to the First Cause of Action, that Defendant be enjoined, restrained, and
19 ordered to comply with the provisions of Section 25249.6 of the California Health
20 & Safety Code;
- 21 2. That Defendant be ordered to make best efforts to identify and locate each
22 individual in California to whom it, or its customers or agents, distributed or sold
23 Products during the past three years, and to provide a warning to each such person
24 that use of the Product will expose that person to a chemical known to cause
25 cancer;
- 26 3. That Defendant be assessed a civil penalty in an amount equal to \$2,500.00 per day
27 per individual exposed to styrene in violation of Section 25249.6 of the California
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Health & Safety Code, as the result of Defendant’s marketing, distributing, and/or selling the Products for use in California.

- 4. That, pursuant to Civil Procedure Code § 1021.5, Defendant 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: May 19, 2022

LAW OFFICES OF BRIAN GAFFNEY APC



Brian Gaffney
Attorney for Plaintiff
ECOLOGICAL RIGHTS FOUNDATION

LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation
446 Old County Road, Suite 100-310
Pacifica, California 94044
(650) 219 3187 Phone
brian@gaffneylegal.com

April 24, 2019

Notice of Violations
Safe Drinking Water and Toxic Enforcement Act

By Certified Mail, Return Receipt Requested to Violators in U.S.A.
By Registered Mail to Violators Located Outside U.S.A.
By First Class U.S. Mail to Public Enforcement Agencies

Dear Public Enforcement Agencies / Violators:

This office and Ecological Rights Foundation (“ERF”) gives you notice that, since at least April 24, 2016 the businesses listed on Attachment A have been, and continue to be, in violation of California Health & Safety Code §25249.6. ERF is a California non-profit corporation dedicated to protecting human and environmental health, including raising awareness of, and reducing exposures to, toxic chemicals.

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 on the attached Certificate of Service.

The above referenced violations occur when California residents use 3D pens utilizing filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments. Use of 3D pens and the above identified filaments expose people to styrene, a chemical known to the State of California to cause cancer. 3D pens sold by the businesses listed on Attachment A expose consumers and workers to styrene via inhalation.

Examples of particular products manufactured, sold, distributed and/or marketed by the violators are attached as Attachment B. All of the 3D pens at issue in this notice can be used with filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS)

filaments. When people use these 3D pens, the above filaments are heated by the 3D pens and thus release styrene into the air. People using 3D pens utilizing filaments incorporating a styrene monomer, and others in the same room where such 3D pens are being used, inhale styrene in the normal course of use.

In addition, exposures in the environmental context occur in the homes, businesses, schools and public locations where the people use 3D pens utilizing filaments incorporating a styrene monomer. Exposures to styrene occur within the consumer and environmental contexts.

The businesses listed on Attachment A did not and do not provide clear and reasonable warnings to people who use 3D pens utilizing filaments incorporating a styrene monomer, that use of these products will expose them to chemicals known to cause cancer. The above violations have occurred every day since at least April 24, 2016 and will continue every day until clear and reasonable warnings are given.

Attachment B is a non-exclusive list of examples of these types of products. Though specific models or product numbers are given as examples, this Notice also pertains to all models and all variations of 3D pens utilizing filaments incorporating a styrene monomer sold in California. Attachment B is for the recipient's benefit and is not meant to be an exhaustive or comprehensive identification of each specific offending product. It is ERF's position that the alleged Violators are 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.

These violations and threatened violations will continue to occur everyday until these businesses either provide clear and reasonable warnings, reformulate their 3d pens so as not to use filaments incorporating a styrene monomer, or stop selling these 3d pens in California. These violations occur in all of California's 58 counties, both on and off of these businesses' properties.

In keeping with its public interest mission and to expeditiously rectify these ongoing violations of California law, ERF is interested in seeking a constructive resolution of this matter without engaging in costly and protracted litigation.

The following individual is the responsible individual within ERF for purposes of this Notice:

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

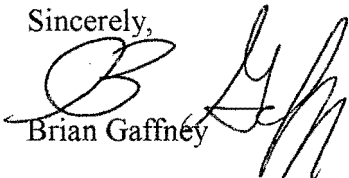
ERF has retained the following counsel to represent it in this matter. **Please direct communications to counsel.**

Brian Gaffney
LAW OFFICES OF BRIAN GAFFNEY APC
446 Old County Road, Suite 100-310
Pacifica, California 94044
(650) 219 3187
brian@gaffneylegal.com

Resolution of Noticed Claims:

ERF is interested in seeking a constructive resolution of this matter that advances the public interest without engaging in costly and protracted litigation. ERF is willing to settle this matter to the extent legally possible prior to the commencement of any enforcement action. Settlement terms would require that the unwarned exposures described in this Notice of Violation be stopped. That would require at least the following: 1) a potential recall of products already sold; 2) that either warnings be given to all future purchasers in California of the products subject to this Notice, that the products be reformulated to eliminate the exposures described in the Notice, or that you stop marketing, distributing or selling the products in California; 3) that you locate and provide a warning compliant with 27 Cal. Code Regs Section 25601 to each person who has been subject to the unwarned exposures described in the Notice to the extent those exposures are caused by products that were sold in California during the past three years; and 4) that you pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249(b). It should be noted that ERF cannot finalize any settlement of this matter until 70 days have elapsed since the sending of the Notice and unless no public enforcer has begun an enforcement action concerning the violations described in the Notice. Any settlement on behalf of the public interest must be approved by the California Superior Court on noticed motion with 45 days' notice to the California Attorney General. The Attorney General may appear at any approval hearing and oppose a settlement if he or she believes the proposed settlement is not in the public interest. If you wish to discuss settlement of this matter before ERF files suit, please promptly contact ERF's counsel.

Sincerely,


Brian Gaffney

Enclosure to Violators "The Safe Drinking Water and Toxic Enforcement Act of 1986: A Summary." A Certificate of Merit is also attached.

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

I, Brian Gaffney, 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.

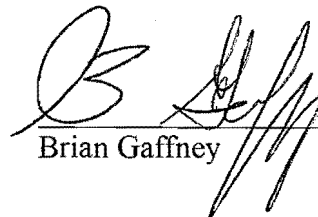
(3) I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed chemical that is the subject of the action.

(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: April 24, 2019

By:



Brian Gaffney

Attachment A – Violators – 3D Pens

Walmart Inc.

Platinum Micro Inc.

Media Supply, Inc.

Profound 3D

WobbleWorks LLC

Amazon.com Inc.

MYNT3D

Hunan World Maya Ecommerce Co., Ltd.

ATTACHMENT B**3D PENS**

<u>Violator</u>	<u>Product</u>
Walmart Inc.	3D PEN GEN-II by Titanium Micro MODEL: MK0607
Platinum Micro Inc.	3D PEN GEN-II by Titanium Micro MODEL: MK0607
Media Supply, Inc.	IDRAWING 3D Printing Pen UPC: 183206 002297
Profound 3D	IDRAWING 3D Printing Pen UPC: 183206 002297
WobbleWorks LLC	3DOODLER CREATE+ 3D PEN UPC: 817005 022407
Amazon.com Inc.	MYNT3D PROFESSIONAL PRINTING 3D PEN B01BLQ24IW
MYNT3D	MYNT3D PROFESSIONAL PRINTING 3D PEN B01BLQ24IW

ATTACHMENT B**3D PENS**

Violator	Product
Amazon.com Inc.	TECBOSS 3D PEN SL-300 X001VHTFM1
Hunan World Maya Ecommerce Co., Ltd.	TECBOSS 3D PEN SL-300 X001VHTFM1

CERTIFICATE OF SERVICE

I, Brian Gaffney, declare:

If so called, I could and would testify as follows: I am over eighteen. My business address is 446 Old County Road, Suite 100-310, Pacifica, CA 94044.

On April 24, 2019, I caused the attached

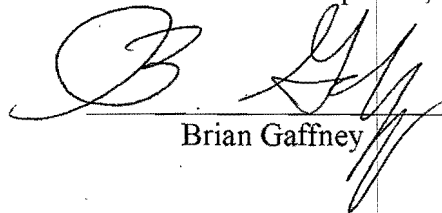
(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary, (4) Certificate of Service to be served by CERTIFIED MAIL to each private business entity listed on the attached SERVICE LIST-Noticed Parties, except for each private business located outside of the U.S.A. which are served by REGISTERED MAIL. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected.

In addition, on the same date and I caused the attached

(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 the Attorney General), (4) Certificate of Service by FIRST CLASS U.S. MAIL on those public enforcement agencies listed on the attached SERVICE LIST-Public Enforcers. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected, and

by sending portable document format (PDF) files of the same to the electronic mail addresses to each of the public prosecutors identified by the California Attorney General as having authorized electronic service of notices. These public enforcement agencies appear on the attached Service List with their electronic mail addresses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on April 24, 2019, at Pacifica, California.



Brian Gaffney

**SERVICE LIST-Noticed Parties
3D PENS**

Jeffrey P. Bezos or
Current President or CEO,
Amazon.Com Inc.
410 Terry Avenue
North Seattle WA 98109-5210

Walmart Inc.
ATTN: President/CEO
708 SW 8th Street
Bentonville, AR 72716

Media Supply, Inc.
ATTN: President/CEO
208 Philips Road, Exton PA 19341

WobbleWorks LLC
c/o BRIAN ALBERS
1558 McDANIEL AVE
SAN JOSE CA 95126

Amazon.Com Inc.
c/o CSC - LAWYERS INCORPORATING
SERVICE
2710 Gateway Oaks Dr., Ste. 150N
Sacramento CA 95833

Platinum Micro Inc.
c/o CHALERMCHAI SIRICHALERMCHAI
15815 MONTE ST, STE F103
SYLMAR CA 91342

Media Supply Inc.
ATTN: President/CEO, 611 Jeffers Circle
Exton PA 19341

Walmart, Inc.
c/o CT Corporation System
818 West Seventh Street, Suite 930 Los
Angeles, CA 90017

MYNT3D
ATTN: President/CEO
4041 Soquel Dr., Ste A148
Soquel, CA 95073

Profound 3D
ATTN: President/CEO
208 Philips Rd
Exton PA 19341

Hunan World Maya Ecommerce Co.,
Ltd., ATTN: President/CEO,
Yuhua Qu Xiangfu Donglu, 2Duan
168Hao Shanshuixiyuan 5Dong 701,
Changsha, Hunan, China 410007

Service List - Public Enforcers

Office of the District Attorney Alameda County CEPDProp65@acgov.org	Office of the District Attorney Lassen County mlatimer@co.lassen.ca.us	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 CityAttyProp65@sandiego.gov	Office of the District Attorney Tulare County Prop65@co.tulare.ca.us
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 gregory.alker@sfgov.org	Office of the District Attorney Tuolumne County 423 N. Washington Street Sonora, CA 95370
Office of the District Attorney Calaveras County Prop65Env@co.calaveras.ca.us	Office of the District Attorney Mariposa County P.O. Box 730 Mariposa, CA 95338	Office of the District Attorney San Joaquin County DAConsumer.Environmental@sjcda.org	Office of the District Attorney Ventura County daspecialops@ventura.org
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 edobroth@co.slo.ca.us	Office of the District Attorney Yolo County cfepd@yolocounty.org
Office of the District Attorney Contra Costa County sgrassini@contracostada.org	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 DAProp65@co.santa-barbara.ca.us	Office of the District Attorney 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 EPU@da.sccgov.org	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 Prop65DA@co.monterey.ca.us	Office of the District Attorney Santa Cruz County Prop65DA@santacruzcounty.us	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 CEPD@countyofnapa.org	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, 4th 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 inyoda@inyocounty.us	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, Suite 200 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 jbarnes@sonoma-county.org	
Office of the District Attorney Kings County 1400 West Lacey Blvd. Hanford, CA 93230	Office of the District Attorney Riverside County Prop65@rivcoda.org	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 Prop65@sacda.org	Office of the District Attorney Sutter County 446 Second Street, Suite 102 Yuba City, CA 95991	