

ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
10/19/2022 at 03:27:44 PM
By: Cheryl Clark,
Deputy Clerk

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Counsel for Plaintiff
ECOLOGICAL RIGHTS FOUNDATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

ECOLOGICAL RIGHTS FOUNDATION,

Plaintiff,

v.

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

Defendants.

Case No. **22CV020002**

COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES

Health & Safety Code § 25249.5 et seq.

(Other)

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

INTRODUCTION

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

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

1 filaments incorporating a styrene monomer, and others standing in the same room, inhale styrene in
2 the 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 3D printers capable of using filaments incorporating a styrene monomer into the
8 California marketplace, exposing users of the Products to styrene. Despite the fact that Defendant
9 exposes consumers and individuals to styrene, Defendant provides no warnings about the
10 carcinogenic risks associated with such exposures. Defendant’s conduct thus violates the warning
11 provision of Proposition 65. Health & 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 identify and
16 locate each individual person to whom Defendant conveyed Products during the past three years
17 and to provide to each such individual, as well as new purchasers and Product users, a clear and
18 reasonable warning that use of the Products causes exposures to a chemical known to cause cancer.

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

21 **PARTIES**

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

28 7. AMAZON.COM INC. is a person in the course of doing business within the meaning of

1 Health & Safety Code §25249.11(b). AMAZON.COM INC. manufactures, markets, distributes,
2 and/or sells the Products for sale and use in the State of California.

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

11 **JURISDICTION**

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

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

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

24 **BACKGROUND**

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

1 defects, or other reproductive harm without a “clear and reasonable warning” unless the business
2 responsible for the exposure can prove that it fits within a statutory exemption. Health & Safety
3 Code Section 25249.6 states, in pertinent 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 13. On April 22, 2016, the State of California officially listed styrene as a chemical known to
9 cause cancer. On April 22, 2017, styrene exposures became subject to the clear and reasonable
10 warning requirements under Proposition 65. 27 C.C.R. § 27001(b); Health & Safety Code Section
11 25249.10(b).

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

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

1 Plaintiff enclosed factual information sufficient to establish the basis of the Certificate of Merit
2 with the Notice of Violation letters sent to the Attorney General.

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

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

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

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

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1 **FIRST CAUSE OF ACTION**

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

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

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

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

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

13 24. Defendant has failed and continues to fail to provide clear and reasonable warnings
14 regarding the carcinogenicity of styrene to users of the Products.

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

18 **PRAAYER FOR RELIEF**

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

- 20 1. Pursuant to the First Cause of Action, that Defendant be enjoined, restrained, and
21 ordered to comply with the provisions of Section 25249.6 of the California Health
22 & Safety Code;
- 23 2. That Defendant be ordered to make best efforts to identify and locate each
24 individual in California to whom it, or its customers or agents, distributed or sold
25 Products during the past three years, and to provide a warning to each such person
26 that use of the Product will expose that person to a chemical known to cause
27 cancer;
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3. That Defendant be assessed a civil penalty in an amount equal to \$2,500.00 per day per individual exposed to styrene in violation of Section 25249.6 of the California 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: October 14, 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 printers 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 printers and the above identified filaments expose people to styrene, a chemical known to the State of California to cause cancer. 3D printers 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 printers 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)

and thus release styrene into the air. People using the 3D printers utilizing filaments incorporating a styrene monomer, and others in the same room where such 3D printers 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 printers 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 printers 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 printers 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 printers so as not to use filaments incorporating a styrene monomer, or stop selling these 3d printers 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.

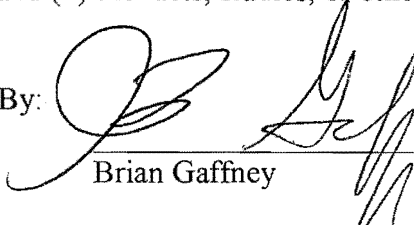
(3) I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed chemical that is the subject of the action.

(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 Printers

Amazon.com Inc.

Robo 3D Inc.

Monoprice Inc.

Staples, Inc.

Print-Rite, N.A. Inc.

Afinia 3D

Microboards Technology LLC

Flashforge USA, Inc.

Walmart Inc.

TEVO 3D Electronic Technology Co. Ltd.,

XYZPRINTING, INC.

Kinpo Group

ATTACHMENT B 3D PRINTERS

Violator	Product
Amazon.com Inc.	Robo R1+ 3D PERSONAL 3D PRINTER UPC: 855076 005400 A1218BAT15000668
Robo 3D Inc.	Robo R1+ 3D PERSONAL 3D PRINTER UPC: 855076 005400 A1218BAT15000668
Monoprice Inc.	Monoprice MP Mini Delta 3D Printer UPC: 889028 049884
Staples, Inc.	Colido DIY3D Printer / LMD024XQ7J1 UPC: 6955530 944086
Print-Rite, N.A. Inc.	Colido DIY3D Printer / LMD024XQ7J1 UPC: 6955530 944086
Afinia 3D	AFINIA H400 3D Printer MODEL 3DP-12-4M UPC: 678621 110097
Microboards Technology LLC	AFINIA H400 3D Printer MODEL 3DP-12-4M UPC: 678621 110097
Flashforge USA, Inc.	FlashForge Creator Pro 3D Printer SKU: 4H8931 UPC: 0737557590219
Walmart Inc.	FlashForge Creator Pro 3D Printer SKU: 4H8931 UPC: 0737557590219

ATTACHMENT B 3D PRINTERS

Violator	Product
Walmart Inc.	TEVO TARANTULA i3 TR-01A SKU: 735845 TH6474
TEVO 3D Electronic Technology Co. Ltd.,	TEVO TARANTULA i3 TR-01A SKU: 735845 TH6474

Amazon.com Inc.	XYZ PRINTING DAVINCI 1.0 PRO UPC: 840710 108180
XYZPRINTING, INC.	XYZ PRINTING DAVINCI 1.0 PRO UPC: 840710 108180
Kinpo Group	XYZ PRINTING DAVINCI 1.0 PRO UPC: 840710 108180

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

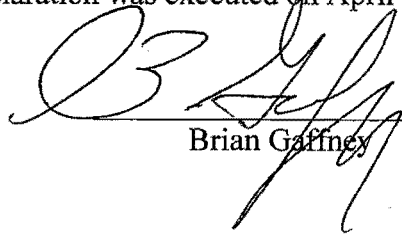
(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary, (4) Certificate of Service to be served by CERTIFIED 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 PRINTERS**

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

Robo 3D Inc.,
ATTN: President/CEO
5070 SANTA FE Street, STE C
SAN DIEGO CA 92109

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

Print-Rite, N.A., Inc.
ATTN: President/CEO
201 SPEAR STREET, STE 1100 #3204
SAN FRANCISCO CA 94105

Flashforge USA Inc.
c/o PAUL CHENG
17747 RAILROAD STREET
CITY OF INDUSTRY CA 91748

XYZPrinting, Inc.
c/o TIM T CHANG
One Wilshire Blvd., Suite 2000,
LA CA 90017

Kinpo Group
10th Floor., 99 NanKing East Road
Sec 5, Taipei, 105 Taiwan

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

Monoprice, Inc.
c/o BERNARD LUTHI
ONE POINTE DR., SUITE#400
BREA, CA 92821

Staples, Inc.,
ATTN: President/CEO
500 Staples Drive
Framingham, MA, 01702

Afinia 3D
ATTN: President/CEO
8150 Mallory Ct
Chanhassen, MN 55317

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

XYZ Printing
ATTN: President/CEO
20191 Windrow Drive, Suite B
Lake Forest CA 92630

XYZPrinting, Inc.,
147, Beishen Rd., Sec. 3,
New Taipei City,
22201 Taiwan

Robo 3d Inc.
c/o TAILORED LEGAL, A PROFESSION
CORPORATION,
3555 4th Avenue
San Diego, CA 92103

Monoprice, Inc.
Attn: President/CEO
ONE POINTE DR., SUITE#400
BREA, CA 92821

Print-Rite N.A., Inc.
c/o JEMMA JANG
1077 Timber Crest Drive
SAN JOSE CA 95120

Microboards Technology LLC
ATTN: President/CEO
8150 Mallory Ct, PO Bx 846
Chanhassen, MN 55317

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

TEVO 3D Electronic Technology Co.
Ltd., ATTN: President/CEO, 9
Ruiyunnan Road West, Mazhang |
Zhanjiang, China, 524000

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	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
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