Electronically FILED	by Superior Court of California, County of Los Angeles on 07/24/2020 05:17 PM Sherri R. Carter, Executive Officer/Clerk of Court, by N. Alvarez,Deputy Clerk 20STCV28055		
	Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Mark Mooney		
1	Peter T. Sato (SBN: 238486) Davitt, Lalley, Dey, & McHale, PC		
2	2710 Gateway Oaks Dr.		
3	Suite 150N Sacramento, CA 95833		
4	Phone: 810-309-8235 Email: peter.sato@dldmlaw.com		
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6	Attorneys for Plaintiff Key Sciences, LLC		
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-	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
9	COUNTY OF LOS ANGELES		
10	KEY SCIENCES, LLC,	CASE NO. 20STCV28055	
11	Plaintiff,	COMPLAINT FOR INJUNCTIVE	
12	vs.	RELIEF, CIVIL PENALTIES, AND OTHER RELIEF UNDER HEALTH AND	
13	WHOLE FOODS MARKET, INC., a Texas	SAFETY CODE SECTION 25249.5, et seq	
14	corporation; and DOES 1-10,	(PROPOSITION 65)	
15	Defendants.		
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18	Plaintiff Key Sciences, LLC ("Plaintiff" or "Key Sciences") hereby alleges the		
19	following on information and belief:		
20	INTRODUCTION		
21	1. This action seeks injunctive and declaratory relief and civil penalties to remedy the		
22	continuing failure of Defendant WHOLE FOODS MARKET, INC. ("Defendant") to warn		
23	consumers in California that they are being exposed to Bisphenol A ("BPA"), a chemical known		
24	to the State of California to cause reproductive toxicity found in 365 Everyday Value Organic		
25	Mushroom Ravioli (8 oz) ("Product" or "Products").		
26	2. This action is brought in the public interest and is based on The Safe Drinking Water and		
27	Page 1 COMPLAINT FOR VIOLATIONS OF HEALTH AND SAFETY CODE § 25249.5 ET SEQ.		
28	COMPLAINT FOR VIOLATIONS OF HEAL	TH AND SAFETY CODE § 25249.5 ET SEQ.	

Toxic Enforcement Act of 1986 (Health and Safety Code § 25249.6 et seq.) also known as
 "Proposition 65." This statute mandates that any person in the course of doing business must
 provide a clear and reasonable warning prior to exposing any individual to a chemical known to
 the state to cause cancer, birth defects or other reproductive harm.

PARTIES

3. Key Sciences is a limited liability corporation whose mission is to ensure accuracy of labeling for the benefit and protection of consumers of packaged goods through rigorous scientific testing. Key Sciences is a person within the meaning of Health and Safety Code section 25249.11, subdivision (a). Key Sciences, acting as a private attorney general, brings this action in the public interest as defined under Health and Safety Code section 25249.7, subdivision (d).

4. Defendant is a Texas corporation, doing business in the State of California at all relevant times herein.

5. Plaintiff is presently unaware of the true names and capacities of defendants DOES 1-10, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed, believes, and thereon alleges that each fictitiously named defendant is responsible in some manner for the occurrences herein alleged and the violations caused thereby. DOES 1-10 are each a person in the course of doing business within the meaning of Health and Safety Code §§ 25249.6 and 25249.11.

6. At all times mentioned herein, the term "Defendants" includes Defendant and DOES 1-10.

7. Defendants employ ten or more persons and have employed ten or more persons at all times relevant to this action, and are each a person in the course of doing business within the meaning of Health and Safety Code §§ 25249.6 and 25249.11.

Page 2 COMPLAINT FOR VIOLATIONS OF HEALTH AND SAFETY CODE § 25249.5 ET SEQ.

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JURISDICTION AND VENUE

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

9. This Court has jurisdiction over this action pursuant to Health and Safety Code section 25249.7, which allows enforcement of violations of Proposition 65 in any Court of competent jurisdiction.

10. This Court has jurisdiction over Defendants because Defendants either reside or are located in this State or are foreign corporations authorized to do business in California, are registered with the California Secretary of State, or Defendants have sufficient minimum contacts with California, and otherwise intentionally avails itself of the California market through the marketing, distribution, and/or sale of Products in the State of California, so as to render the exercise of jurisdiction over Defendants by the California courts consistent with traditional notions of fair play and substantial justice.

11. Venue is proper in the Los Angeles Superior Court because the cause of action arises out of violations in the County of Los Angeles and/or because Defendants conducted, and continue to conduct, business in the County of Los Angeles with respect to the consumer products that are the subject of this action.

12. Plaintiffs seek injunctive and declaratory relief and civil penalties from Defendants' violations of the prohibitions of Proposition 65 (Health and Safety Code § §25249.5 et seq.)

STATUTORY BACKGROUND

13. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute passed as "Proposition 65" by close to a two-to-one voting margin.

14. Proposition 65 requires that individuals be provided with a "clear and reasonable warning" before being exposed to substances listed by the State of California as causing cancer

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or reproductive toxicity. The warning requirement of Proposition 65 is contained in Health & Safety Code § 25249.6, which provides,

No 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 giving clear and reasonable warning to such individual....

15. In this case, the exposures are caused by consumer products. "Consumer product" means any article, or component part thereof, including food, that is produced, distributed, or sold for the personal use, consumption or enjoyment of a consumer. (27 California Code of Regulations § 25600.1(d)) "Consumer product exposure" means an exposure that results from a person's acquisition, purchase, storage, consumption, or any reasonably foreseeable use of a consumer product, including consumption of a food. (27 California Code of Regulations § 25600.1(e)).

16. Proposition 65 provides that any "person who violates or threatens to violate" the statute
"may be enjoined in a court of competent jurisdiction." (Health & Safety Code § 25249.7).
Violators are liable for civil penalties of up to \$2,500 per day for each violation of the Act.
(Health & Safety Code §25249.7(b)(1).)

17. Violations of Proposition 65 may be enforced by any person in the public interest, after providing a 60-day notice of the violations of the Attorney General, appropriate District Attorneys and City Attorneys and the alleged violator. (Health and Safety Code § 25249.7(d)(1).) Remedies include injunctive relief to prevent actual or threatened violations, and penalties up to \$2,500 per day per violation. (Health and Safety Code §25249.7(a) and (b).)

18. Proposition 65 requires the State to publish a list of chemicals known to cause cancer or birth defects or other reproductive harm (Health and Safety Code §25249.8.) This list now comprises over 800 chemicals.

19. Proposition 65 establishes a procedure by which the State is to develop a list of chemicals
"known to the State to cause cancer or reproductive toxicity." (Health & Safety, § 25249.8.)
20. BPA was listed as a chemical known to the State of California to cause reproductive

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COMPLAINT FOR VIOLATIONS OF HEALTH AND SAFETY CODE § 25249.5 ET SEQ.

toxicity on May 11, 2015. BPA became subject to the warning requirement one year later and 1 2 was therefore subject to the "clear and reasonable" warning requirements of Proposition 65 3 beginning on May 11, 2016. (27 California Code of Regulations § 25000, et seq.; Health & 4 Safety Code § 25249.5, et seq.).

FACTUAL BACKGROUND

21. Defendants are businesses that develop, manufacture, package, distribute, market, and/or sell the Product in the State of California.

22. Plaintiff hired a well-respected and accredited testing laboratory to test Defendant's Product for BPA. The results of the testing show that the Product contains BPA.

23. Plaintiff has tested a number of products within the same category as the Product at issue. Comparison of these tests show that the BPA level found in the Defendant's Product is higher than 62 percent of all of the testing on similar products within the same category.

24. Individuals are exposed to the BPA when they ingest the Product.

25. At all times relevant to this action, Defendants, therefore, have knowingly and intentionally exposed the users of the Product to BPA without first giving a clear and reasonable warning to such individuals. The Product continues to be distributed and sold in California without providing the requisite warning, and thus the violations are ongoing and continuous and will continue to occur into the future.

19 26. On April 24, 2020, Plaintiff served Defendant and each appropriate public enforcement 20 agency with a Proposition 65 Notice, a document entitled "Sixty-Day Notice of Intent to Sue for 21 Violation of the Safe Drinking Water and Toxic Enforcement Act of 1986" ("Notice of 22 Violation") that provided Defendant and the public enforcement agency with notice that 23 Defendant was in violation of Proposition 65 for failing to warn purchasers and consumers of the 24 Product that ingestion of the Product exposes them to BPA, a chemical known to the State of California to cause reproductive toxicity. The Notice of Violation is designated with Attorney General number 2020-01060. The Notice of Violation constitutes adequate notice to Defendant

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Page 5 COMPLAINT FOR VIOLATIONS OF HEALTH AND SAFETY CODE § 25249.5 ET SEQ. because it provided adequate information to allow Defendant to assess the nature of the alleged
 violations. A certificate of merit and a certificate of service accompanied the Notice of Violation,
 and both certificates comply with Proposition 65 and its implementing regulations. A true and
 correct copy of the Notice of Violation is attached here as Exhibit A and is incorporated herein
 by reference.

27. More than 60 days have passed since Plaintiff served the Notice of Violation and no public enforcement entity has filed a Complaint in this case.

28. As a proximate result of acts by Defendants, persons in the course of doing business within the meaning of Health & Safety Code § 25249.11(b), individuals throughout the State of California, including in the County of Los Angeles, have been exposed to BPA without a clear and reasonable warning.

FIRST CAUSE OF ACTION

(Violation of Health & Safety Code § 25249.6, Failure to Provide Clear and Reasonable Warning under Proposition 65 – Against all Defendants)

29. Plaintiff re-alleges and incorporates by reference Paragraphs 1 through 28, inclusive, as if superficially set forth herein.

30. By committing the acts alleged above, Defendants have, in the course of doing business, knowingly and intentionally exposed users of the Product to BPA, a chemical known to the State of California to cause reproductive toxicity without first giving clear and reasonable warning to such individuals within the meaning of Health & Safety Code § 25249.6 and continue to violate the statute with each successive sale of the Product.

31. Said violations render Defendants liable for civil penalties, up to \$2,500 per day for each violation, and subject Defendants to injunction.

<u>SECOND CAUSE OF ACTION</u> (Declaratory Relief – Against all Defendants)

32. Plaintiff re-alleges and incorporates by reference Paragraphs 1 through 31, inclusive, as if

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superficially set forth herein.

33. There exists an actual controversy relating to the legal rights and duties of the Parties within the meaning of the Code of Civil Procedure § 1060, between Plaintiff and Defendants, concerning whether Defendants have exposed individuals to chemicals known to the State of California to cause birth defects and other reproductive harm without providing clear and reasonable warning.

PRAYER

Wherefore, Plaintiff accordingly prays for the following relief:

34. An assessment of civil penalties pursuant to Health & Safety Code § 25249.7(b), against Defendants in the amount of \$2,500 per day for each violation of Proposition 65;

35. An injunctive order, pursuant to Health & Safety Code § 25249.7(a), for such temporary restraining orders, preliminary and permanent injunctive orders as are necessary to prevent Defendants from exposing individuals to BPA without providing a clear and reasonable warning for the Product;

36. On all Causes of Action, an award to Plaintiff of its reasonable attorneys' fees and costs;37. For such other relief as the Court may deem just and proper.

DATED: July 24, 2020

DAVITT, LALLEY, DEY, & MCHALE, PC

Peter T. Sato Attorney for Plaintiff Key Sciences, LLC

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EXHIBIT A



SIXTY-DAY NOTICE OF INTENT TO SUE FOR VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (Cal. Health & Safety Code § 25249.5, et seq.) ("Proposition 65")

April 24, 2020

Re: Violations of Proposition 65 concerning food products containing Bisphenol A ("BPA")

Dear Alleged Violators and the Appropriate Public Enforcement Agencies:

Davitt, Lalley, Dey, & McHale, PC ("DLDM") represents Key Sciences ("Key Sciences"), a limited liability company acting in the interest of the general public to promote awareness of exposures to toxic chemicals in products sold in California and to improve human health by reducing hazardous substances contained in such items.

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

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

<u>Alleged Violators</u>. The names of the companies covered by this notice that violated Proposition 65 (hereinafter the "Violators") are:

WHOLE FOODS MARKET, INC.

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

365 Everyday Value Organic Mushroom Ravioli (8 oz)

On May 11, 2015, the State of California officially listed BPA as a chemical known to cause female reproductive toxicity.

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

<u>Route of Exposure</u>. The consumer exposures that are the subject of this notice result from the recommended use of these products. Consequently, the route of exposure to this chemical has been and continues to be through ingestion.

<u>Approximate Time Period of Violations</u>. Ongoing violations have occurred every day since at least April 9, 2020, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemical. The method of warning should be a warning that appears on the product label. The Violators violated Proposition 65 because they failed to provide persons ingesting these products with appropriate warnings that they are being exposed to this chemical.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, Key Sciences is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violators to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemical, or provide appropriate warnings on the labels of these products; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above products in the last three years. Such a resolution will prevent further unwarned consumer exposures to the identified chemical, as well as an expensive and time-consuming litigation.

Key Sciences has retained me as legal counsel in connection with this matter. Please direct all communications regarding this Notice of Violation to my attention at the law office address and telephone number indicated below.

Sincerely Shelley Clark

Shelley Clark Associate Attorney Davitt, Lalley, Dey, & McHale, PC

Attachments

Certificate of Merit Certificate of Service OEHHA Summary (to Whole Foods Market, Inc., and their Registered Agents for Service of Process only) Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

Re: Davitt, Lalley, Dey, & McHale, PC's Notice of Proposition 65 Violations by Whole Foods Market, Inc.

I, Shelley Clark, declare:

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

2. I am an Associate Attorney for the noticing party.

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

4. Based on the information obtained through those consultants, and on other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and that the information did not prove that the alleged Violators will be able to establish any of the affirmative defenses set forth in the statute.

5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: April 24, 2020

Sheller (Chot)

CERTIFICATE OF SERVICE PURSUANT TO 27 CCR § 25903

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States and over the age of 18 years of age. My business address is 707 17th Street, Denver, CO. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Denver, CO.

On April 24, 2020, between 8:00 a.m. and 5:00 p.m. Eastern Time, I served the following documents: NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 *ET SEQ.*; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY" on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current President or CEO Whole Foods Market, Inc. 550 Bowie St. ATTN: Tax Department Austin, TX 78703-4644

C T Corporation Whole Foods Market, Inc. 1999 Bryan Street Suite 900 Dallas, TX 75201

On April 24, 2020, between 8:00 a.m. and 5:00 p.m. Eastern Time, I verified the following documents NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 *ET SEQ.*; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1) were served on the following party when a true and correct copy thereof was uploaded on the California Attorney General's website, which can be accessed at https://oag.ca.gov/prop65/add-60-day-notice :

Office of the California Attorney General Prop 65 Enforcement Reporting 1515 Clay Street, Suite 2000 Post Office Box 70550 Oakland, CA 94612-0550

On April 24, 2020, between 8:00 a.m. and 5:00 p.m. Eastern Time, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5** *ET SEQ.*; **CERTIFICATE OF MERIT;** on each of the parties on the Service List attached hereto by placing a true and correct .PDF copy thereof to be sent via electronic mail to the parties listed below, pursuant to Cal. Code Regs., title. 27, §25903(c)(I) or via First Class Mail through the United States Postal Service by placing a true and correct copy in a sealed envelope, addressed to the entity listed below and providing such an envelope to a United States Postal Service Representative.

Executed on April 24, 2020, in Denver, CO

Allison Stevens

Davitt, Lalley, Dey, & McHale, PC || 415-496-9035 || Shelley.Clark@dldmlaw.com || 773 Center Blvd., Unit 26, Fairfax, CA 94978

List for Service by Electronic Mail

Alameda County District Attorney	Calaveras County District Attorney
CEPDProp65@acgov.org	Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney	Inyo County District Attorney
sgrassini@contracostada.org	inyoda@inyocounty.us
Lassen County District Attorney	Monterey County District Attorney
mlatimer@co.lassen.ca.us	Prop65DA@co.monterey.ca.us
Napa County District Attorney	Riverside County District Attorney
CEPD@countyofnapa.org	Prop65@rivcoda.org
Sacramento County District Attorney	San Diego City Attorney
Prop65@sacda.org	CityAttyProp65@sandiego.gov
San Diego County District Attorney	San Francisco County District Attorney
CityAttyCrimProp65@sandiego.gov	Gregory.alker@sfgov.org
San Francisco City Attorney	San Joaquin County District Attorney DA
Valerie.Lopez@sfcityatty.org	DAConsumer.Environmental@sjcda.org
San Luis Obispo County District Attorney	Santa Barbara County District Attorney
edobroth@co.slo.ca.us	DAProp65@co.santa-barbara.ca.us
Santa Clara County District Attorney	Santa Cruz County District Attorney
EPU@da.sccgov.org	Prop65DA@santacruzcounty.us
Sonoma County District Attorney	Tulare County District Attorney
jbarnes@sonoma-county.org	Prop65@co.tulare.ca.us
Ventura County District Attorney	Yolo County District Attorney
daspecialops@ventura.org	cfepd@yolocounty.org

District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120

District Attorney, Amador County 708 Court Street, Suite 202 Jackson, CA 95642

District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965

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

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

District Attorney, El Dorado County 778 Pacific St. Placerville, CA 95667

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

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

District Attorney, Humboldt County 825 5th Street 4th Floor Eureka, CA 95501

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

District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301

District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230

District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453

District Attorney, Los Angeles County Hall of Justice 211 West Temple St., Ste 1200 Los Angeles, CA 90012

List for Service by Mail

District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637

District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903

District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338

District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482

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

District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020

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

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

District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701

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

District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971

District Attorney, San Benito County 419 Fourth Street, 2nd Floor Hollister, CA 95023

District Attorney, San Bernardino County 303 West Third Street San Bernardino, CA 92415

District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101 District Attorney, San Mateo County 400 County Ctr., 3rd Floor Redwood City, CA 94063

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

District Attorney, Sierra County 100 Courthouse Square, 2nd Floor Downieville, CA 95936

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

District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533

District Attorney, Stanislaus County 832 12th Street, Ste 300 Modesto, CA 95354

District Attorney, Sutter County 463 2nd Street Yuba City, CA 95991

District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080

District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093

District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370

District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901

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

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