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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

Pacific Bell Telephone Company d/b/a AT&T California, a California Corporation, **AT&T Corp.,** a Delaware Corporation **and AT&T Services, Inc.,** a Delaware Corporation,

Defendants.

Case No. RG 14748856

COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES AND OTHER EQUITABLE RELIEF

(Health & Saf. Code, Div. 20, Chapter 6.5; Bus & Prof. Code, § 17200, *et seq.*)

COPY

Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, based on information and belief, allege as follows:

PLAINTIFF

1. Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, brings this action by and through Kamala D. Harris, Attorney General of the State of California ("Attorney General"), Margarita Padilla, Supervising Deputy Attorney General, David A. Zonana, Acting Supervising Deputy Attorney General, Edward H. Ochoa, Deputy Attorneys General; Nancy E. O'Malley, District Attorney for Alameda County ("Alameda DA"), Kenneth A. Mifsud, Assistant District Attorney and Kevin Wong, Deputy District Attorney (collectively referred to herein as "the People" or "Plaintiff").

2. Pursuant to California Health and Safety Code sections 25145.4 and 25182, the Attorney General, together with the Alameda DA, may bring a civil action in the name of the People of the State of California to enjoin any violation of Chapter 6.5 of Division 20 of the California Health and Safety Code ("Chapter 6.5") and to seek civil penalties for violations of Chapter 6.5.

3. Pursuant to California Business and Professions Code sections 17203, 17204 and 17206, the Attorney General and the Alameda DA may bring a civil action in the name of the People of the State of California to enjoin any person who engages, has engaged, or proposes to engage in unfair competition, as defined in California Business and Professions Code section 17200, and for civil penalties for each act of unfair competition.

4. Plaintiff brings this action without prejudice to any other actions or claims which Plaintiff may have based upon separate, independent and unrelated violations arising out of matters or allegations that are not set forth in this Complaint.

DEFENDANTS

5. Defendant Pacific Bell Telephone Company d/b/a AT&T California is now, and at all times mentioned in this Complaint was, a California corporation and defendants AT&T Corp. and AT&T Services, Inc. are now, and at all times mentioned in this Complaint have been, Delaware corporations (collectively these three entities are referred to herein as "Defendants"). Defendants

do and did business in their own capacity and/or through affiliates in the State of California at the facilities identified in **Exhibit A**, which is incorporated herein by reference (collectively referred to as "Covered Facilities" and further described in paragraph 18 below). Defendants managed certain "target waste" (defined in paragraph 19 below) that constitutes hazardous wastes, including universal wastes, at, or in connection with, Covered Facilities throughout California, including one or more Covered Facilities in Alameda County.

6. Defendants are, and at all times relevant to the claims in this Complaint were, legally responsible for compliance with the provisions of the California Health and Safety Code, Chapter 6.5 of Division 20, and the corresponding implementing regulations, in connection with Defendants' ownership and/or operation of the Covered Facilities.

7. Defendants are "persons" as defined in California Health and Safety Code section 25118.

8. In this Complaint when reference is made to any act or omission of "Defendants," such allegations shall include the acts and omissions of owners, officers, directors, agents, employees, contractors, vendors, affiliates, and/or representatives of Pacific Bell Telephone Company d/b/a AT&T California, AT&T Corp. and AT&T Services, Inc. while acting within the course and scope of their employment or agency on behalf of any of the above entities.

JURISDICTION AND VENUE

9. Venue is proper in this county pursuant to California Health and Safety Code section 25183, in that the violations alleged in this Complaint occurred in the County of Alameda and throughout the State of California. This court has jurisdiction pursuant to Article 6, section 10 of the California Constitution and section 393 of the Code of Civil Procedure.

10. Plaintiff and Defendants have entered into a series of agreements to toll any applicable statutes of limitation. As a result of those agreements, a total of 914 days (the "Tolling Period") will not be included in computing the time limited by any statutes of limitation applicable to the causes of action brought against Defendants based on claims covered by the tolling agreement. Those claims include the claims alleged in this action against Defendants.

STATUTORY AND REGULATORY BACKGROUND

11. The State of California has enacted a comprehensive statutory and regulatory framework governing the generation, handling, treatment, storage, transportation, and disposal of hazardous waste. This framework, contained in Chapter 6.5 and its implementing regulations, which are found at California Code of Regulations, title 22, section 66260.1 et seq., mandates a "cradle to grave" system known as the Hazardous Waste Control Law ("HWCL"). The HWCL system is maintained to record the generation, registration, tracking, storage, treatment, and disposal of hazardous waste and to provide for the protection of the public and the environment from the potential risks posed by hazardous waste. Except where otherwise expressly defined in this Complaint, all terms shall be interpreted consistent with Chapter 6.5 and the Title 22 California Code of Regulations promulgated under that chapter.

ENFORCEMENT AUTHORITY UNDER THE HWCL AND THE UCL

12. Section 25189 of the Health and Safety Code provides for civil liability for any negligent or intentional violation of the HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section 25189.2 of the Health and Safety Code is an alternative strict liability provision, which provides for civil liability for any violation of the HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued or promulgated pursuant to the HWCL. However, pursuant to section 25189.2, subdivision (f), a person may not be held liable for a civil penalty imposed under section 25189 and for a civil penalty imposed under section 25189.2 for the same act.

13. The HWCL, pursuant to Health and Safety Code sections 25145.4, 25181 and 25184, authorizes the Court to issue an order that enjoins any ongoing or potential violation of the HWCL, or any applicable rule, regulation, permit, standard, requirement, or order issued or promulgated pursuant to the HWCL.

14. Health and Safety Code section 25184 provides that in civil actions brought pursuant to the HWCL in which an injunction or temporary restraining order is sought, it shall not be necessary to allege or prove at any stage of the proceeding that irreparable damage will occur

should the temporary restraining order, preliminary injunction, or permanent injunction not be issued; or that the remedy at law is inadequate, and the temporary restraining order, preliminary injunction, or permanent injunction shall issue without such allegations and without such proof.

15. Sections 17200 through 17208 of the Business and Professions Code (the "Unfair Competition Law" or "UCL") provide for civil liability for any person who engages in unfair competition, which section 17200 defines in relevant part to include any "unlawful…business act or practice."

16. The UCL, pursuant to Business and Professions Code sections 17203 and 17204, authorizes the Court to issue an order that enjoins any person who engages, has engaged or proposes to engage in unfair competition. The UCL also provides, pursuant to Business and Professions Code section 17205, that the remedies or penalties provided by the UCL are cumulative to each other and to the remedies or penalties available under all other laws of this state.

GENERAL ALLEGATIONS

17. The allegations in this Complaint relate solely to Defendants' compliance with the HWCL and UCL at, or in connection with, Defendants' Covered Facilities in California and pertain only to the management of "target waste" as further described in paragraph 19 below. Nothing in this Complaint relates to or pertains to any existing or potential claims or causes of action arising out of either or both (a) Defendants' ownership or operation of any non-Covered Facility in California; or (b) the management or disposal of any non-target waste items at or from any facility owned or operated by Defendants in California, including, but not limited to, Covered Facilities, and such claims or causes of action, if any, are reserved by Plaintiff. This Complaint has been filed within five years of the People discovering the HWCL violations alleged herein and the HWCL related allegations in this Complaint cover the period from on or about January 1, 2005 until on or about November 17, 2014. The UCL related allegations in this Complaint cover the four years prior to the date of filing of this Complaint, exclusive of any applicable tolling periods, including those set forth in paragraph 10 herein.

18. At all times relevant hereto and continuing from and after the date of filing of this Complaint, Defendants owned and/or operated, and continue to own and/or operate, over 200 Covered Facilities throughout California. The term "**Covered Facilities**" as used herein shall means those facilities in California which are owned or operated by Defendants, or were operated for a portion of the period covered by this Complaint, and listed on the attached **Exhibit A**, consisting of: (i) facilities that are solely Field Operations Centers; (ii) Material Utilization Centers; and (iii) other operational facilities, such as Administrative or Central Offices, with field technicians assigned and to which such technicians bring target waste items, but excludes operational facilities where there are no trash receptacles at such operational facility or the field technicians do not have access to the trash receptacles, or all target waste items remain in the field technicians' vehicles, and in all instances all target waste items are promptly taken by the field technicians to a separate Covered Facility for proper disposition.

19. Defendants provide telephone, internet and video services to residential and business customers in California. In providing these services, Defendants, by and through their employees at the Covered Facilities, including but not limited to warehouse personnel and field technicians, manage large volumes of electronic equipment (such as remote controls, splitters, splitter filters, transformers, power adapters, power supplies, modems, customer premises equipment, network interface cards, remote terminals, field testing equipment, and devices containing printed circuit boards), batteries (such as lead-acid, lithium-ion and alkaline batteries), and aerosol cans, as well as certain gels, liquids and other items used or carried by technicians (specifically: adhesives and glues, blocking compounds, cable pulling lubricants, calibration gas cylinders, caulk, disinfectants, encapsulants, gel-containing splicing kits, petroleum-based greases and lubricants, hand cleaners and hand sanitizers, leather preserver, liquid industrial cleaners, motor oil, paints, polyurethane expanding foam, road flares, sealants, chemical-protective skin cream, and toner) that have become hazardous waste within the meaning of Health and Safety Code sections 25117 and 25124, and the corresponding title 22 California Code of Regulations (collectively the "**target waste**"). Defendants use some of these items to maintain and power their network, while other items are used by technicians in the course of their duties and still other items are leased to

customers and reclaimed by Defendants at the end of a contract or when upgrading equipment. At all times relevant hereto and continuing from and after the date of filing of this Complaint, electronic equipment, batteries and aerosol cans handled by Defendants at the Covered Facilities or in the field in the course and scope of field technicians employment, were and are rendered unusable for their intended purpose as the result of usage, damage, age, wear, obsolescence and other causes, and must be handled and recycled or disposed of in compliance with the HWCL.

20. At all times relevant to this Complaint, Defendants are or were responsible for the operation of the Covered Facilities in California. At all times relevant to this Complaint, Defendants were aware of and did or do conduct, approve and/or control hazardous waste management activities for the target waste at the Covered Facilities. At all times relevant to this Complaint, Defendants' actions and/or omissions, as part of a continuing course of conduct, are or were the legal cause of the violations alleged herein, and Defendants reasonably could have taken action to prevent the unlawful actions and/or omissions.

21. Plaintiff is informed and believes, and thereupon alleges, that at all times relevant to this Complaint, Defendants generated hazardous waste at each of the Covered Facilities during every ninety (90) day period.

22. Plaintiff alleges that Defendants at all times relevant hereto and continuing from and after the date of filing of this Complaint, caused and/or performed each of the acts and/or omissions in violation of the HWCL in the ownership and/or operation of the Covered Facilities as alleged below:

Disposal Violations

a. Disposed, or caused the disposal of, target waste that constitutes hazardous waste at a point not authorized, in violation of Health and Safety Code section 25189.5, subdivision (a);

b. Disposed, or caused the disposal of new electronic equipment and batteries of the types described in paragraph 19 above, that by virtue of their disposal became a hazardous waste, at a point not authorized, in violation of Health & Safety Code section 25189.5, subdivision (a);

Waste Determination Violations

c. Failed to determine if a generated target waste was a "hazardous waste" as required by California Code of Regulations, title 22, sections 66262.11 and 66260.200(c), and, where such target waste was hazardous, failed to handle the hazardous waste in accordance with the requirements of Chapter 6.5 of the Health and Safety Code and its implementing regulations in California Code of Regulations, title 22, including but not limited to section 66265.172 (compatible contents), and section 66265.177 (placing incompatible waste streams in the same container);

Storage and Accumulation Time Limit Violations

d. Stored target waste that constitutes hazardous waste onsite beyond the time permitted by law at a facility which did not have a hazardous waste storage permit from the California Department of Toxic Substances Control ("DTSC"), in violation of California Code of Regulations, title 22, section 66262.34, and California Health and Safety Code section 25123.3, subdivision (h);

Labeling and Container Violations

e. Failed to properly label containers of accumulated target waste that constitutes hazardous waste, in violation of California Code of Regulations, title 22, section 66262.34, subdivision (f);

f. Failed to maintain containers holding target waste that constitutes hazardous waste at the Covered Facilities capable of being closed while in storage, in violation of California Code of Regulations, title 22, section 66265.173;

g. Failed to properly manage, mark, and store hazardous waste aerosol cans, in violation of section 25201.16 of the California Health and Safety Code;

Transportation and Manifest Violations

h. Delivered, or otherwise transferred custody or possession of, target waste that constitutes hazardous waste to a person or entity that was not properly licensed and registered to transport hazardous waste, in violation of California Health and Safety Code section 25163, subdivision (a)(1);

i. Transported target waste that constitutes hazardous waste without being properly licensed and registered to transport hazardous waste, in violation of California Health and Safety Code section 25163, subdivision (a)(1);

j. Transported, or caused to be transported, target waste that constitutes hazardous waste to unauthorized locations, in violation of Health and Safety Code section 25189.5;

k. Failed to submit to DTSC a legible copy of each manifest used within thirty (30) days of each shipment of target waste that constitutes hazardous waste off-site or into California, in violation of California Code of Regulations, title 22, section 66262.23, subdivision (a)(4);

Training Violations

l. Failed to comply with employee training obligations for employees who are assigned to Covered Facilities and who handled target waste that constitutes hazardous waste, as set forth in California Code of Regulations, title 22, section 66265.16, including but not limited to the requirements to maintain training documentation as specified in these regulations for each employee involved in the handling of hazardous waste;

Universal Waste Violations

m. Stored target waste that constitutes universal waste onsite beyond the time permitted by law, in violation of California Code of Regulations, title 22, section 66273.35;

n. Failed to properly label containers of accumulated target waste that constitutes universal waste, in violation of California Code of Regulations, title 22, sections 66273.34 and 66273.35, subdivision (b);

o. Sent, transported, relinquished, transferred, surrendered or otherwise took target waste that constitutes universal waste to an unauthorized location, in violation of California Code of Regulations, title 22, sections 66273.38, 66273.39, 66273.40 and 66273.41;

p. With respect to target waste that constitutes universal waste, failed to comply with notification requirements for a universal waste handler, in violation of California Code of Regulations, title 22, section 66273.32;

q. Failed to retain copies of all bills of lading pertaining to shipments of target waste that constitute universal waste for three years, in violation of California Code of Regulations, title 22, section 66273.39;

r. Failed to keep a record with the information required by section 66273.39, subdivision (a)(1) – (3), of each shipment of target waste that constitutes universal waste received at the universal waste handler's facility, in violation of California Code of Regulations, title 22, section 66273.39;

s. Failed to comply with employee training obligations for employees who are assigned to Covered Facilities and who handled target waste that constitutes universal waste, as set forth in California Code of Regulations, title 22, section 66273.36, including but not limited to the requirements to maintain training documentation as specified in these regulations for each employee involved in the handling of universal waste; and

Generator ID Violations

t. Treated, stored, disposed of, transported, and offered for transportation, target waste that constitutes hazardous waste without having received and used a proper identification number from the U.S. Environmental Protection Agency or DTSC for the originating facility, in violation of California Code of Regulations, title 22, section 66262.12, subdivision (a).

23. Each of the acts and/or omissions pleaded in Paragraph 22 of this Complaint is part of a continuing course of conduct by Defendants to violate California environmental laws and regulations, such that the statutes of limitation have not yet begun to run on said acts.

FIRST CAUSE OF ACTION

(Intentional Disposal of Hazardous Waste at a Point Not Authorized)

(Health & Safety Code §§ 25189.5, subd. (a) and 25189, subd. (c))

24. Plaintiff realleges paragraphs 1 through 23, inclusive.

25. Health and Safety Code section 25189.5, subdivision (a), prohibits the disposal of hazardous waste at an unauthorized point.

26. Defendants have intentionally disposed or caused the disposal of target waste that constitutes hazardous waste originating from the Covered Facilities at unauthorized points, in

violation of California Health and Safety Code section 25189.5, subdivision (a), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

27. Each intentional disposal of target waste that constitutes hazardous waste at an unauthorized point, subjects Defendants to a separate and additional civil penalty of not less than one thousand dollars ($1,000) under Health and Safety Code section 25189, subdivision (c).

28. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (c) as set forth in Plaintiff's prayer for relief.

SECOND CAUSE OF ACTION

(Negligent Disposal of Hazardous Waste at a Point Not Authorized)

(Health & Safety Code §§ 25189.5, subd. (a) and 25189, subd. (d))

29. Plaintiff realleges paragraphs 1 though 23, inclusive.

30. Health and Safety Code section 25189.5, subdivision (a), prohibits the disposal of hazardous waste at an unauthorized point.

31. Defendants have negligently disposed or caused the disposal of target waste that constitutes hazardous waste originating from the Covered Facilities at unauthorized points in violation of California Health and Safety Code section 25189.5, subdivision (a), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

32. Each negligent disposal of target waste that constitutes hazardous waste at an unauthorized point, subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (d).

33. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (d), as set forth in Plaintiff's prayer for relief.

THIRD CAUSE OF ACTION

(Strict Liability for Disposal of Hazardous Waste at a Point Not Authorized)

(Health & Safety Code, §§ 25189.5, subd. (a) and 25189.2, subd. (c))

34. Plaintiff realleges paragraphs 1 through 23, inclusive.

35. Health and Safety Code sections 25189.5, subdivision (a), prohibits the disposal of hazardous waste at an unauthorized point.

36. Defendants have disposed or caused the disposal of target waste that constitutes hazardous waste originating from the Covered Facilities at unauthorized points, in violation of California Health and Safety Code section 25189.5, subdivision (a), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

37. Each disposal of target waste that constitutes hazardous waste at an unauthorized point subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (c).

38. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189.2, subdivision (c), as set forth in Plaintiff's prayer for relief.

FOURTH CAUSE OF ACTION

(Intentional Violation Hazardous Waste Determination Requirement)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b);

Cal. Code Regs., Tit. 22, §§ 66262.11 and 66260.200(c))

39. Plaintiff realleges Paragraphs 1 through 23, inclusive.

40. California Code of Regulations, title 22, sections 66262.11 and 66260.200(c), require that a person who generates a waste determine if that waste is hazardous using the methods proscribed in the regulation.

41. Defendants have intentionally failed to determine if the target waste they generated through their operations and managed at Covered Facilities is hazardous, in violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California

Code of Regulations sections 66262.11 and 66260.200(c), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

42. Each intentional violation by Defendants of the hazardous waste determination requirement subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

43. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66262.11 and 66260.200(c), with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

FIFTH CAUSE OF ACTION

(Negligent Violation Hazardous Waste Determination Requirement)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b);

Cal. Code Regs., Tit. 22, §§ 66262.11 and 66260.200(c))

44. Plaintiff realleges Paragraphs 1 through 23, inclusive.

45. California Code of Regulations, title 22, sections 66262.11 and 66260.200(c), require that a person who generates a waste determine if that waste is hazardous using the methods proscribed in the regulation.

46. Defendants have negligently failed to determine if the target waste they generated through their operations and managed at Covered Facilities is hazardous, in violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66262.11 and 66260.200(c), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

47. Each negligent violation by Defendants of the hazardous waste determination requirement subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

48. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each negligent violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66262.11 and 66260.200(c), with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

SIXTH CAUSE OF ACTION

(Strict Liability for Violation of Hazardous Waste Determination Requirement)

(Health & Safety Code, §§ 25100, et seq., and 25189.2, subd. (b);

Cal. Code Regs., Tit. 22, §§ 66262.11 and 66260.200(c))

49. Plaintiff realleges Paragraphs 1 through 23, inclusive.

50. California Code of Regulations, title 22, sections 66262.11 and 66260.200(c), require that a person who generates a waste determine if that waste is hazardous using the methods proscribed in the regulation.

51. Defendants have failed to determine if the target waste they generated through their operations and managed at Covered Facilities is hazardous, in violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66262.11 and 66260.200(c), and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

52. Each violation by Defendants of the hazardous waste determination requirement subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

53. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189.2, subdivision (b), for each violation of the hazardous waste determination requirement of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66262.11 and 66260.200(c), with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

SEVENTH CAUSE OF ACTION

(Intentional Violations of Hazardous Waste Storage, Container, Labeling, Marking and Accumulation Time Limits Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b); Cal. Code Regs., Tit. 22, § 66260.1 et seq.)

54. Plaintiff realleges Paragraphs 1 through 23, inclusive.

55. Defendants have intentionally violated, and continues to violate, the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66260.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

56. Each intentional violation by Defendants of the hazardous waste storage, container, labeling, marking and accumulation time limits requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

57. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing

regulations at Title 22 of the California Code of Regulations sections 66260.1 et seq., with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

EIGHTH CAUSE OF ACTION

(Negligent Violations of Hazardous Waste Storage, Container, Labeling, Marking and Accumulation Time Limits Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b); Cal. Code Regs., Tit. 22, §§ 66260.1 et seq.)

58. Plaintiff realleges Paragraphs 1 through 23, inclusive.

59. Defendants have negligently violated and continues to violate the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66260.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

60. Each negligent violation by Defendants of the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements subjects Defendants to a separate and additional civil penalty under Health & Safety Code section 25189, subdivision (b).

61. Based on the above, Plaintiff requests injunctive relief against Defendants under Health & Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each negligent violation of the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66260.1 et seq., with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

NINTH CAUSE OF ACTION

(Strict Liability for Violations of Hazardous Waste Storage, Container Labeling, Marking and Accumulation Time Limits Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189.2, subd. (b); Cal. Code Regs., Tit. 22, § 66260.1 et seq.)

62. Plaintiff realleges Paragraphs 1 through 23, inclusive.

63. Defendants have violated and continues to violate the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq. and its implementing regulations at Title 22 of the California Code of Regulations section 66260.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

64. Each violation by Defendants of the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements, subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

65. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189.2, subdivision (b), for each violation of the hazardous waste storage, container, labeling, marking, and accumulation time limits requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66260.1 et seq., with regard to the target waste at the Covered Facilities, as set forth in Plaintiff's prayer for relief.

TENTH CAUSE OF ACTION

(Intentional Violations of Hazardous Waste Transportation and Manifest Requirements)

(Health & Safety Code, §§ 25163, 25189, subd. (b); Cal. Code Regs., Tit. 22, § 66263.23)

66. Plaintiff realleges paragraphs 1 through 23, inclusive.

67. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transfer or transportation of hazardous waste. Section 25163 prohibits the transfer of hazardous waste to a Transporter who does not have a valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23, subdivision (b), further prohibits the transportation of hazardous waste to a location not permitted or otherwise authorized by DTSC to receive the waste. And, title 22 of the California Code of Regulations section 66263.23, subdivision (a)(4), further requires that the generator submit to DTSC a legible copy of each manifest used within thirty days of each shipment of hazardous waste off-site or into California.

68. Defendants intentionally transferred target waste that constitutes hazardous waste to transporters who did not have valid registrations from DTSC from the Covered Facilities for transportation to unauthorized locations, in violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, without providing a manifest to DTSC within thirty days of each shipment, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

69. Each act of unauthorized transfer or transportation or failure to manifest subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b), for each intentional violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

70. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the transportation and manifest requirements of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, with regard to the target waste, as set forth in Plaintiff's prayer for relief.

ELEVENTH CAUSE OF ACTION

(Negligent Violations of Hazardous Waste Transportation and Manifest Requirements)

(Health & Safety Code, §§ 25163 and 25189, subd. (b);

Cal. Code Regs., Tit. 22, § 66263.23)

71. Plaintiff realleges paragraphs 1 through 23, inclusive.

72. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transfer or transportation of hazardous waste. Section 25163 prohibits the transfer of hazardous waste to a transporter who does not have a valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23, subdivision (b), further prohibits the transportation of hazardous waste to a location not permitted or otherwise authorized by DTSC to receive the waste. And, title 22 of the California Code of Regulations section 66263.23, subdivision (a)(4), further requires that the generator submit to DTSC a legible copy of each manifest used within thirty days of each shipment of hazardous waste off-site or into California.

73. Defendants have negligently transferred target waste that constitutes hazardous waste to transporters who did not have valid registrations from DTSC, from the Covered Facilities for transportation to unauthorized locations, in violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, without providing a manifest to DTSC within thirty days of each shipment, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

74. Each act of unauthorized transfer or transportation or failure to manifest subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b), for each negligent violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

75. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each negligent violation of the transportation and manifest requirements of Health and Safety Code section 25163 and Title 22 of the California

Code of Regulations section 66263.23, with regard to the target waste, as set forth in Plaintiff's prayer for relief.

TWELFTH CAUSE OF ACTION

(Strict Liability for Violations of Hazardous Waste Transportation and Manifest Requirements)

(Health & Safety Code, §§ 25163 and 25189.2, subd. (b); Cal. Code Regs., Tit. 22, § 66263.23)

76. Plaintiff realleges paragraphs 1 through 23, inclusive.

77. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized transfer or transportation of hazardous waste. Section 25163 prohibits the transfer of hazardous waste to a transporter who does not have a valid registration from DTSC. Title 22 of the California Code of Regulations section 66263.23, subdivision (b), further prohibits the transportation of hazardous waste to a location not permitted or otherwise authorized by DTSC to receive the waste. And, title 22 of the California Code of Regulations section 66263.23, subdivision (a)(4), further requires that the generator submit to DTSC a legible copy of each manifest used within thirty days of each shipment of hazardous waste off-site or into California.

78. Defendants have transferred target waste that constitutes hazardous waste to transporters who did not have valid registrations from DTSC, from the Covered Facilities for transportation to unauthorized locations, in violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, without providing a manifest to DTSC within thirty days of each shipment, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

79. Each act of unauthorized transfer or transportation or failure to manifest subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (b), for each violation of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23.

80. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and

Safety Code section 25189.2, subdivision (b), for each strict liability violation of the transportation and manifest requirements of Health and Safety Code section 25163 and Title 22 of the California Code of Regulations section 66263.23, with regard to the target waste, as set forth in Plaintiff's prayer for relief.

THIRTEENTH CAUSE OF ACTION

(Intentional Violation Hazardous Waste and Universal Waste Training Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b);

Cal. Code Regs., Tit. 22, §§ 66265.16 and 66273.36)

81. Plaintiff realleges Paragraphs 1 through 23, inclusive.

82. California Code of Regulations, title 22, sections 66265.16 and 66273.36, require that the generator of hazardous waste, including universal waste, provide annual training pertaining to the handling of hazardous waste or universal waste, as appropriate and maintain training documentation as specified in these regulations for each employee involved in the handling of hazardous waste.

83. Through their operations, Defendants generate target waste that constitutes hazardous waste, including universal waste, at Covered Facilities and have intentionally failed to train field technicians and other employees who handle that target waste, in violation of the training requirements of California Code of Regulations, title 22, sections 66265.16 and 66273.36, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

84. Each intentional violation by Defendants of the hazardous waste and universal waste training requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

85. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the hazardous waste and universal waste training requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of

Regulations sections 66265.16 and 66273.36, with regard to employees handling the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

FOURTEENTH CAUSE OF ACTION

(Negligent Violation Hazardous Waste and Universal Waste Training Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b);

Cal. Code Regs., Tit. 22, §§ 66265.16 and 66273.36)

86. Plaintiff realleges Paragraphs 1 through 23, inclusive.

87. California Code of Regulations, title 22, sections 66265.16 and 66273.36, require that the generator of hazardous waste, including universal waste, provide annual training pertaining to the handling of hazardous waste or universal waste, as appropriate and maintain training documentation as specified in these regulations for each employee involved in the handling of hazardous waste.

88. Through their operations, Defendants generate target waste that constitutes hazardous waste, including universal waste, at Covered Facilities and have negligently failed to train field technicians and other employees who handle that target waste, in violation of the training requirements of California Code of Regulations, title 22, sections 66265.16 and 66273.36, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

89. Each negligent violation by Defendants of the hazardous waste and universal waste training requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

90. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each negligent violation of the hazardous waste and universal waste training requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66265.16 and 66273.36, with regard to employees handling the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

FIFTEENTH CAUSE OF ACTION

(Strict Liability for Violation of Hazardous Waste and Universal Waste Training Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189.2, subd. (b); Cal. Code Regs., Tit. 22, §§ 66265.16 and 66273.36)

91. Plaintiff realleges Paragraphs 1 through 23, inclusive.

92. California Code of Regulations, title 22, sections 66265.16 and 66273.36, require that the generator of hazardous waste, including universal waste, provide annual training pertaining to the handling of hazardous waste or universal waste, as appropriate and maintain training documentation as specified in these regulations for each employee involved in the handling of hazardous waste.

93. Through their operations, Defendants generate target waste that constitutes hazardous waste, including universal waste, at Covered Facilities and have failed to train field technicians and other employees who handle that target waste, in violation of the training requirements of California Code of Regulations, title 22, sections 66265.16 and 66273.36, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

94. Each violation by Defendants of the hazardous waste and universal waste training requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

95. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189.2, subdivision (b), for each violation of the hazardous waste and universal waste training requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66265.16 and 66273.36, with regard to employees handling the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

SIXTEENTH CAUSE OF ACTION

(Intentional Violations of Hazardous Waste Control Laws for Universal Waste Disposal, Management, Labeling, Marking, Accumulation Time Limits, Sending and Tracking Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b); Cal. Code Regs., Tit. 22, §§ 66273.1 et seq.)

96. Plaintiff realleges Paragraphs 1 through 23, inclusive.

97. Defendants have intentionally violated, and continues to violate, the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

98. Each intentional violation by Defendants of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

99. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each intentional violation of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273.1 et seq., with regard to the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

SEVENTEENTH CAUSE OF ACTION

(Negligent Violations of Hazardous Waste Control Laws for Universal Waste Management, Disposal, Labeling, Marking, Accumulation Time Limits, Sending and Tracking Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189, subd. (b); Cal. Code Regs., Tit. 22, §§ 66273.1 et seq.)

100. Plaintiff realleges Paragraphs 1 through 23, inclusive.

101. Defendants have negligently violated, and continues to violate, the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

102. Each negligent violation by Defendants of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

103. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189, subdivision (b), for each negligent violation of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273..1 et seq., with regard to the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

EIGHTEENTH CAUSE OF ACTION

(Strict Liability Violations of Hazardous Waste Control Laws for Universal Waste Management, Disposal, Labeling, Marking, Accumulation Time Limits, Sending and Tracking Requirements)

(Health & Safety Code, §§ 25100, et seq., and 25189.2, subd. (b); Cal. Code Regs., Tit. 22, §§ 66273.1 et seq.)

104. Plaintiff realleges Paragraphs 1 through 23, inclusive.

105. Defendants have violated, and continues to violate, the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273.1 et seq., with regard to the target waste at the Covered Facilities, and unless enjoined by order of the Court, Defendants may or will continue in the course of conduct as alleged herein.

106. Each violation by Defendants of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements subjects Defendants to a separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

107. Based on the above, Plaintiff requests injunctive relief against Defendants under Health and Safety Code section 25181, and civil penalties against Defendants under Health and Safety Code section 25189.2, subdivision (b), for each violation of the universal waste disposal, management, labeling, marking, accumulation time limits, sending and tracking requirements of Chapter 6.5 of Division 20 of the Health and Safety Code section 25100 et seq., and its implementing regulations at Title 22 of the California Code of Regulations sections 66273.1 et seq., with regard to the target waste at or in connection with the Covered Facilities, as set forth in Plaintiff's prayer for relief.

NINETEENTH CAUSE OF ACTION

(Violations of Unfair Competition Laws)

(Bus. & Prof. Code §§ 17200 - 17208)

108. Plaintiff realleges paragraphs 1 through 107, inclusive.

109. Within four (4) years of commencing this action, exclusive of any applicable tolling periods, including those set forth in paragraph 10 herein, Defendants have engaged in, and continue to engage in, acts or practices that constitute unfair competition within the meaning of Business and Professions Code sections 17200 through 17208, including but not limited to, the acts or practices alleged in the First through Eighteenth Causes of Action, above.

110. Pursuant to Business and Professions Code section 17206, Defendants are liable for civil penalties for each and every violation as alleged herein.

111. Defendants must be immediately and permanently enjoined, pursuant to Business and Professions Code section 17203, from engaging in acts or practices that, as alleged in this Complaint, violate Chapter 6.5 and their implementing regulations, which thereby constitute unfair competition within the meaning of Business and Professions Code section 17200.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief as to Defendants:

1. A preliminary and permanent injunction requiring Defendants to comply with those provisions of Health and Safety Code, Division 20, Chapter 6.5 and implementing regulations, which Defendants are alleged to have violated;

2. A preliminary and permanent injunction, issued pursuant to Business and Professions Code section 17203, prohibiting Defendants from engaging in acts or practices that violate the provisions of Chapter 6.5 of Division 20 of the Health and Safety Code, as alleged in this Complaint, which thereby constitute unfair competition within the meaning of Business and Professions Code section 17200;

3. Civil penalties against Defendants pursuant to Health and Safety Code section 25189, subdivisions (b), (c) and (d), in an amount according to proof.

4. Civil penalties against Defendants pursuant to Health and Safety Code section 25189.2, subdivision (b), in an amount according to proof;

5. Civil penalties against Defendants, pursuant to Business and Professions Code section 17206, of $2,500.00 for each violation of unfair competition laws engaged in by Defendants, in an amount according to proof;

6. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit herein, including but not limited to such attorneys fees and costs as are authorized to be recovered pursuant to Code of Civil Procedure section 1021.8; and,

7. Such other and further relief as the Court deems just and proper.

Dated: November 17, 2014

Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California
MARGARITA PADILLA
Supervising Deputy Attorney General

DAVID A. ZONANA
Acting Supervising Deputy Attorney General
Attorneys for Plaintiff, People of the State of California

Dated: November 17, 2014

NANCY O'MALLEY
District Attorney of the County of Alameda

KENNETH A. MIFSUD
Assistant District Attorney
Attorneys for Plaintiff, People of the State of California

EXHIBIT A

EXHIBIT A - Covered Facilities List

FACILITY NO.	CITY	STREET ADDRESS
1	AGOURA HILLS	29293 AGOURA RD (Listed as 29300 by sorting vendor)
2	ALHAMBRA	21 S 1ST ST
3	ANAHEIM	3925 E CORONADO ST
4	ANAHEIM	1251 N. RED GUM ST
5	ANGELS CAMP	808 S MAIN ST
6	ANTIOCH	2701 VERNE ROBERTS CIRCLE
7	ARCADIA	21 W SANTA CLARA ST
8	ARROYO GRANDE	225 N HALCYON RD
9	ATASCADERO	6220 ATASCADERO AVE
10	AUBURN	12920 EARHART AVE
11	AVALON	135 WHITTLEY AVE
12	BAKER	72316 BAKER BLVD
13	BAKERSFIELD	101 V ST
14	BAKERSFIELD	3221 S H ST
15	BAKERSFIELD	5650 ALDRIN CT
16	BELL	6707 SALT LAKE AVE (combined site also handling building with address of 6708 Salt Lake Ave.)
17	BERKELEY	1206 5TH ST
18	BETHEL ISLAND	6221 BETHEL ISLAND ROAD
19	BEVERLY HILLS	490 FOOTHILL RD
20	BRISBANE	355 VALLEY DR
21	BUENA PARK	8925 ORANGETHORPE AVE
22	BUENA PARK	7701 ARTESIA BLVD
23	CAMPBELL	1160 DELL AVENUE
24	CANOGA PARK	22012 VANOWEN ST / 6685 TOPANGA CANYON BLVD
25	CANYON COUNTRY	26971 FURNIVALL AVE
26	CASTRO VALLEY	2610 NORBRIDGE AVE
27	CHATSWORTH	20350 PLUMMER ST
28	CHICO	3750 MORROW LN
29	CHULA VISTA	490 MAIN ST
30	CLEARLAKE	2510 OLD HIGHWAY 53 (listed as 2570 Old Highway 53 per sorting vendor)
31	CLOVIS	3375 PEACH AVE
32	COMMERCE	2420 YATES AVE
33	COMPTON	806 S. ALAMEDA ST
34	CONCORD	1714 COLFAX ST
35	CONCORD	2450 WHITMAN RD
36	CONCORD	2745 CLOVERDALE AVE
37	CORONA	215 N JOY STREET
38	COSTA MESA	2280 FAIRVIEW RD
39	DALY CITY	359 WASHINGTON ST
40	DEL REY OAKS	161 CALLE DEL OAKS
41	DELANO	925 JEFFERSON ST
42	DINUBA	225 N K ST
43	EL CAJON	435 N JOHNSON AVE
44	EL CENTRO	1029 S 2ND ST
45	EL MONTE	10983 LOWER AZUSA RD
46	EL MONTE	3640 EL MONTE AVE
47	EL SEGUNDO	195 S DOUGLAS ST
48	EL SOBRANTE	3920 SAN PABLO DAM RD

EXHIBIT A - Covered Facilities List

FACILITY NO.	CITY	STREET ADDRESS
49	ELK	5861 S HWY 1
50	ESCONDIDO	555 W 13TH ST
51	ESCONDIDO	575 N QUINCE ST
52	ESCONDIDO	950 W WASHINGTON AVE
53	EUREKA	5749 HUMBOLDT HILL RD
54	FAIRFIELD	3235 N TEXAS ST
55	FELTON	5946 HIGHWAY 9
56	FONTANA	15384 ARROW BLVD
57	FONTANA	17070 CERES AVE
58	FORT BRAGG	920 N FRANKLIN ST
59	FREMONT	42000 BOYCE RD
60	FREMONT	44900 INDUSTRIAL DR
61	FRESNO	2515 S ORANGE AVE
62	FRESNO	4734 E CARMEN AVE
63	FRESNO	5520 E HEDGES AVE
64	FULLERTON	300 STATE COLLEGE
65	GARDEN GROVE	13062 EUCLID ST
66	GARDEN GROVE	13732 NEWHOPE ST
67	GARDENA	100 W ALONDRA BLVD
68	GARDENA	17040 S VERMONT AVE
69	GLENDALE	515 PIONEER DR
70	GLENDALE	720 WESTERN AVE
71	GRASS VALLEY	315 COLFAX AVE
72	GRASS VALLEY	530 FREEMAN LN
73	HALF MOON BAY	525 KELLY AVE
74	HANFORD	11091 AVENUE 10 1/2
75	HAYWARD	100 ORCHARD AVE
76	HOLLISTER	717 MCCRAY ST
77	JACKSON	951 S STATE HIGHWAY 49
78	KING CITY	105 DIVISION ST
79	LA CANADA FLINTRIDGE	4815 OAK GROVE DR
80	LAGUNA NIGUEL	27392 CAMINO CAPISTRANO / 27402 CAMINO CAPISTRANO
81	LAKEPORT	555 LAKEPORT BLVD
82	LODI	110 W TURNER RD
83	LOS ANGELES	111 N UNION AVE
84	LOS ANGELES	1429 N GOWER ST / 6105 DE LONGPRE AVE
85	LOS ANGELES	2445 DALY ST
86	LOS ANGELES	3035 ANDRITA ST
87	LOS ANGELES	316 N JUANITA AVE
88	LOS ANGELES	5035 COLISEUM ST
89	LOS ANGELES	5041 REPETTO AVE
90	LOS ANGELES	6135 WHITTIER BLVD (listed as 6138 Whittier by sorting vendor)
91	LOS ANGELES	8075 MELROSE AVE
92	LOS ANGELES	467 E. VERNON AVE
93	LOS BANOS	1405 S CALIFORNIA AVE
94	MADERA	221 S E ST
95	MARTINEZ	4501 PACHECO BLVD
96	MERCED	1860 WARDROBE AVE
97	MODESTO	1412 GRANITE LN
98	MODESTO	1548 CARPENTER RD
99	MODESTO	1025 13TH ST
100	MODESTO	3090 FARRAR AVE

EXHIBIT A - Covered Facilities List

FACILITY NO.	CITY	STREET ADDRESS
101	MOJAVE	2100 BELSHAW ST
102	MONTROSE	2275 FLORENCITA AVE
103	MORRO BAY	788 MAIN ST
104	MOUNT SHASTA	1219 S MOUNT SHASTA BLVD
105	MOUNTAIN VIEW	360 PIONEER WAY
106	NAPA	230 CAMINO ORUGA CT
107	NEWHALL	24522 LYONS AVE
108	NORTH HOLLYWOOD	7744 LANKERSHIM BLVD
109	OAKLAND	1189 58TH AVE
110	OAKLAND	479 45TH ST
111	OAKLAND	545 W GRAND AVE
112	OAKLAND	865 77TH AVE
113	OCEANSIDE	2229 MISSION AVE
114	OCEANSIDE	2727 OCEANSIDE BLVD
115	ORANGE	901 E. KATELLA AVE
116	ORANGE	2525 N ORANGE OLIVE RD
117	ORANGEVALE	5951 MAIN AVE
118	OROVILLE	2525 LOWER WYANDOTTE RD
119	PALMDALE	2655 E AVENUE Q
120	PALMDALE	921 E PALMDALE BLVD
121	PARADISE	772 ELLIOTT RD
122	PASADENA	271 N CARMELO AVE
123	PASADENA	901 S RAYMOND AVE
124	PASO ROBLES	908 28TH ST
125	PETALUMA	630 JEFFERSON ST
126	PITTSBURG	337 E 12TH ST
127	PLACERVILLE	281 INDUSTRIAL DR
128	PLEASANTON	4400 BLACK AVE
129	PLEASANTON	7240 JOHNSON DR
130	PORTERVILLE	1301 W OLIVE AVE
131	PORTOLA	225 N GULLING (listed as 222 N Gulling by sorting vendor)
132	QUINCY	150 N MILL CREEK RD
133	RAMONA	1021 A ST
134	RANCHO CORDOVA	2615 MERCANTILE DR
135	RANCHO CORDOVA	1913 BIRKMONT DR
136	RED BLUFF	645 DIAMOND AVE
137	REDDING	4434 MOUNTAIN LAKES BLVD
138	REDWOOD CITY	1200 MARSH ROAD
139	REDWOOD CITY	2001 E BAYSHORE RD
140	RESEDA	18333 GAULT ST
141	RESEDA	6843 RESEDA BLVD
142	RIVERSIDE	3073 ADAMS ST
143	RIVERSIDE	9129 MAGNOLIA AVE
144	ROCKLIN	3545 INDUSTRIAL AVENUE
145	ROCKLIN	4075 CINCINNATI AVE
146	ROSEMEAD	8633 GRAND AVE
147	SACRAMENTO	1558 JULIESSE AVE
148	SACRAMENTO	1590 JULIESSE AVE
149	SACRAMENTO	1821 24TH ST
150	SACRAMENTO	8221 GALENA AVE
151	SACRAMENTO	2700 WATT AVE
152	SALINAS	1060 TERVEN AVE

EXHIBIT A - Covered Facilities List

FACILITY NO.	CITY	STREET ADDRESS
153	SALINAS	316 GRIFFIN ST
154	SALINAS	445 AIRPORT BLVD
155	SAN BRUNO	840 SAN BRUNO AVE W
156	SAN DIEGO	16720 W BERNARDO DR
157	SAN DIEGO	2850 MIDWAY DR
158	SAN DIEGO	3750 HOME AVE
159	SAN DIEGO	3855 ASH STREET
160	SAN DIEGO	4772-4782 ALVARADO CANYON ROAD
161	SAN DIEGO	7250 CONVOY CT
162	SAN DIEGO	7620 CONVOY CT
163	SAN DIEGO	7910 OTHELLO AVE
164	SAN DIEGO	9210 MIRA ESTE COURT
165	SAN DIEGO	9790 OLSON DR
166	SAN DIEGO	7597 RAYTHEON RD
167	SAN DIEGO	4255 RUFFIN RD
168	SAN DIEGO	11330 SORRENTO VALLEY
169	SAN FRANCISCO	1199 INDIANA ST
170	SAN FRANCISCO	35 TUBBS ST
171	SAN FRANCISCO	1330 16TH ST
172	SAN FRANCISCO	30 ONONDAGA AVE
173	SAN FRANCISCO	610 BRANNAN ST
174	SAN FRANCISCO	430 BUSH ST
175	SAN FRANCISCO	100 PAUL AVE
176	SAN FRANCISCO	6150 3RD ST
177	SAN JOSE	145 S MONTGOMERY ST
178	SAN JOSE	1651 BERRYESSA RD
179	SAN JOSE	3042 ROSE AVE (listed as 3036 Rose by sorting vendor)
180	SAN JOSE	3598 HILLCAP AVE
181	SAN JOSE	5285 DOYLE RD
182	SAN LEANDRO	1661 DOOLITTLE
183	SAN LEANDRO	1910 FAIRWAY DR
184	SAN LEANDRO	530 E 14TH ST
185	SAN LUIS OBISPO	196 SUBURBAN RD
186	SAN MATEO	1901 PACIFIC BLVD
187	SAN MATEO	262 19TH AVE / 288 19th AVE
188	SAN RAFAEL	23 MARK DR
189	SAN RAFAEL	96 LOUISE ST
190	SAN RAMON	39 BETA CT
191	SANTA ANA	2201 S. ANNE ST.
192	SANTA CLARA	1051 MARTIN AVE
193	SANTA CLARA	1600 COLEMAN AVE
194	SANTA CLARA	1700 SPACE PARK DR
195	SANTA CLARA	3025 RAYMOND ST
196	SANTA CLARA	310 MARTIN AVE
197	SANTA CRUZ	7070 SOQUEL AVE
198	SANTA ROSA	3260 SEBASTOPOL RD # 3 (listed as 3760 Sebastopol by sorting vendor)
199	SANTEE	10111 PROSPECT AVE

EXHIBIT A - Covered Facilities List

FACILITY NO.	CITY	STREET ADDRESS
200	SHERMAN OAKS	4959 SEPULVEDA BLVD
201	SIMI VALLEY	1844 SYCAMORE DR
202	SIMI VALLEY	2250 WARD AVE
203	SONORA	142 PONDEROSA DR
204	SOUTH LAKE TAHOE	2075 ELOISE AVE
205	SOUTH SAN FRANCISCO	1477 HUNTINGTON AVE
206	SOUTH SAN FRANCISCO	150 SOUTH LINDEN AVE
207	STOCKTON	2300 E EIGHT MILE RD
208	STOCKTON	4051 NEWTON RD
209	STOCKTON	1413 BOURBON ST
210	STOCKTON	3707 DUCK CREEK DR
211	SUNNYVALE	1188 W EVELYN AVE
212	TAHOE CITY	2945 LAKE FOREST RD (listed as 2944 Lake Forest by sorting vendor)
213	TEHACHAPI	115 S CURRY ST
214	TEMPLETON	3880 RUTH WAY
215	TRACY	707 E 11TH ST
216	TRACY	4100 COMMERCIAL DR
217	TRUCKEE	11012 W RIVER ST
218	TURLOCK	551 S CENTER ST
219	TUSTIN	1301 EDINGER AVE
220	TUSTIN	14451 MYFORD RD
221	UKIAH	300 KUKI RD
222	VALLEJO	730 CAROLINA ST
223	VAN NUYS	16201 RAYMER ST / 16251 RAYMER ST
224	VAN NUYS	7715 BURNET AVE
225	VAN NUYS	14709 VANOWEN ST
226	VENTURA	1264 CALLENS RD (listed as 1204 Callens by sorting vendor)
227	VENTURA	739 E. SANTA CLARA ST
228	VISALIA	245 S CAIN ST
229	VISALIA	7345 W. GOSHEN AVE, STE A
230	WATSONVILLE	515 CHAPPEL RD
231	WEST SACRAMENTO	1777 CEBRIAN ST
232	WEST SACRAMENTO	4000 CHANNEL DR
233	WILMINGTON	1418 BROAD AVE
234	WOODLAND	57 W KENTUCKY AVE
235	YOSEMITE N.P.	9036 VILLAGE DR
236	YREKA	314 PINE ST
237	YUBA CITY	1301 THARP RD