



1 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA (“People”), based on  
2 information and belief, alleges as follows:

3 **PLAINTIFF**

4 1. The People bring this action and by and through Nancy E. O’Malley, District  
5 Attorney of Alameda County; Todd D. Riebe, District Attorney of Amador County; Michael L.  
6 Ramsey, District Attorney of Butte County; Mark A. Peterson, District Attorney of Contra Costa  
7 County; Elizabeth A. Egan, District Attorney of Fresno County; Lisa S. Green, District Attorney  
8 of Kern County; Greg Strickland, District Attorney of Kings County; Jackie Lacey, District  
9 Attorney of Los Angeles County; Michael N. Feuer, City Attorney of Los Angeles; Michael R.  
10 Keitz, District Attorney of Madera County; Edward S. Berberian, Jr., District Attorney of Marin  
11 County; Larry D. Morse, District Attorney of Merced County; Dean D. Flippo, District Attorney  
12 of Monterey County; Gary Lieberstein, District Attorney of Napa County; Tony Rackauckas,  
13 District Attorney of Orange County; R. Scott Owens, District Attorney of Placer County; Paul  
14 Zellerbach, District Attorney of Riverside County; Jan Scully, District Attorney of Sacramento  
15 County; Michael A. Ramos, District Attorney of San Bernardino County; Bonnie M. Dumanis,  
16 District Attorney of San Diego County; Jan Goldsmith, City Attorney of San Diego; George  
17 Gascòn, District Attorney of San Francisco County; James P. Willett, District Attorney of San  
18 Joaquin County; Gerald T. Shea, District Attorney of San Luis Obispo County; Stephen M.  
19 Wagstaffe, District Attorney of San Mateo County; Joyce E. Dudley, District Attorney of Santa  
20 Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara County; Bob Lee, District  
21 Attorney of Santa Cruz County; Stephen Carlton, District Attorney of Shasta County; Donald A.  
22 du Bain, District Attorney of Solano County; Jill R. Ravitch, District Attorney of Sonoma  
23 County; Birgit A. Fladager, District Attorney of Stanislaus County; Jana McClung, Acting  
24 District Attorney of Sutter County; Tim Ward, District Attorney of Tulare County; Michael L.  
25 Knowles, District Attorney of Tuolumne County; Gregory D. Totten, District Attorney of Ventura  
26 County; and Jeff W. Reisig, District Attorney of Yolo County (collectively “Prosecutors”).

27 2. Pursuant to Health and Safety Code section 25182, the Prosecutors may bring a  
28 civil action in the name of the People of the State of California to enjoin any violation of Chapter

1 6.5 of Division 20 of the Health and Safety Code (hereinafter "Chapter 6.5") and to seek civil  
2 penalties for violations of the provisions of Chapter 6.5.

3 3. Pursuant to Health and Safety Code sections 25515.6 and 25515.7, the Prosecutors  
4 may bring a civil action in the name of the People of the State of California to enjoin any  
5 violation of Health and Safety Code sections 25504 to 25508.2, inclusive, or section 25511 of  
6 Chapter 6.95 of Division 20 of the Health and Safety Code (hereinafter "Chapter 6.95").

7 4. Pursuant to Business and Professions Code sections 17203, 17204, and 17206, the  
8 Prosecutors may bring a civil action in the name of the People of the State of California to enjoin  
9 any person who engages, has engaged, or proposes to engage in unfair competition, as defined in  
10 California Business and Professions Code section 17200, and to seek civil penalties for each act  
11 of unfair competition.

12 5. Plaintiff brings this action without prejudice to any other action or claim which  
13 Plaintiff may have based on separate, independent and unrelated violations arising out of matters  
14 or allegations that are not set forth in this Complaint.

15 **DEFENDANT, LOWE'S HOME CENTERS, LLC.,**  
16 **DEFENDANT ORCHARD SUPPLY COMPANY, LLC**  
17 **AND DEFENDANTS' FACILITIES**

18 6. Defendant Lowe's Home Centers, LLC (hereinafter "Lowe's"), is now and at all  
19 times mentioned in this Complaint was, a North Carolina corporation, with its principal corporate  
20 offices located in Mooresville, North Carolina.

21 7. Defendant Orchard Supply Company, LLC (hereinafter "New Orchard") is now a  
22 North Carolina limited liability company with its principal place of business in San Jose,  
23 California. Lowe's and New Orchard are collectively referred to herein as "Defendants".

24 8. At all times relevant, Defendants owned, operated, licensed, or leased (in their  
25 own capacity and/or through affiliates), retail home improvement stores, distribution centers, and  
26 vehicles used to transport products and materials to and from such facilities, in the State of  
27 California, specifically including: i) Lowe's current and former retail stores, distribution centers,  
28 and vehicles in the State of California used to transport products and materials to and from such  
facilities, located in the State of California that are responsible for the shipment of goods around,

1 into and out of the State of California that are or were owned, operated, licensed, or leased by  
2 Lowe's (hereinafter referred to as "California Lowe's Facilities"), and ii) New Orchard's current  
3 and former retail stores, distribution centers, and vehicles primarily in the State of California used  
4 to transport products and materials to and from such facilities that are responsible for the  
5 shipment of goods around, into and out of State of California after August 30, 2013 that are  
6 owned, operated, licensed, or leased by New Orchard (hereinafter referred to as "California and  
7 Oregon Orchard Facilities"). The specific list of the locations of the California Lowe's Facilities  
8 is attached as **Exhibit A-1** and the specific list of the locations of the California and Oregon  
9 Orchard Facilities is attached as **Exhibit A-2** and shall not be to the exclusion of other locations  
10 that may have been inadvertently omitted from the list. Hereinafter, California Lowe's Facilities  
11 and California and Oregon Orchard Facilities are collectively referred to as "Defendants'  
12 Facilities." The People are informed and believe and based thereon allege that violations of the  
13 laws and regulations alleged herein were committed at California Lowe's Facilities and may have  
14 been committed at California and Oregon Orchard Facilities.

15 9. The People are informed and believe and based thereon allege that at all times  
16 relevant hereto and as more fully alleged in paragraph 22, below, Defendants stocked, stored and  
17 sold hazardous materials at and from Defendants' Facilities. These hazardous materials include,  
18 but are not limited to, over-the-counter medications, bleaches, pool chemicals (e.g., chlorine and  
19 acid), pesticides, fertilizers, batteries, electronic devices, appliances, mercury containing lamps,  
20 paints, paint tints, lamp oil and other ignitable liquids, metal shavings, aerosol products,  
21 household cleaners, compressed gasses and cylinders, lighters, flooring, herbicides, caulks,  
22 sealers, printed circuit board, various other cleaning agents, automotive products, building  
23 supplies and other flammable, reactive, toxic and corrosive materials. Defendants also generated  
24 regulated quantities of hazardous waste at each of Defendants' Facilities as a result of their  
25 business practices.

26 10. At all times relevant hereto, Defendants were and are legally responsible for  
27 compliance with the provisions of the Health and Safety Code, including Chapters 6.5 and 6.95 of  
28 Division 20, at Defendants' Facilities, as provided by Paragraph 8. The People are informed and

1 believe and based thereon allege that at all relevant times Defendants controlled and were  
2 responsible for the operations of Defendants' Facilities and/or aided and abetted or acted in  
3 concert with persons who exercised control over those operations, including but not limited to, all  
4 acts and omissions relating to the management of hazardous materials and hazardous waste at  
5 Defendants' Facilities, and/or that Defendants, or their predecessors, failed to take appropriate  
6 steps to prevent and/or correct the violations alleged herein despite having power, authority and  
7 notice sufficient to do so.

8 11. Defendants are "persons," as defined in Health and Safety Code section 25118 and  
9 Business & Professions Code section 17201, and a "business," as defined in Health and Safety  
10 Code section 25501, subdivision (c).

11 12. When reference is made herein to any act or omission of Defendants, such  
12 allegation shall include the act or omission of the owners, officers, directors, agents, employees,  
13 contractors, affiliates, and/or representatives of those entities, or each of them, engaged in said act  
14 or omission.

### 15 **JURISDICTION AND VENUE**

16 13. Venue is proper in this county pursuant to Health and Safety Code sections 25183  
17 and 25515.6, in that certain of the violations alleged in the Complaint occurred in the County of  
18 Alameda and throughout the State of California. This Court has jurisdiction pursuant to Article 6,  
19 section 10 of the California Constitution and section 393 of the Code of Civil Procedure.

20 14. Plaintiff and Lowe's entered into a series of agreements to toll any applicable  
21 statutes of limitation. As a result of those agreements, the period of time from May 3, 2012,  
22 through the date of the filing of the Complaint herein, inclusive (the "Tolling Period"), will not be  
23 included in computing the time limited by any statutes of limitation applicable to the causes of  
24 action brought against Lowe's based on claims covered by the tolling agreements. Those claims  
25 include the claims alleged in this action against Defendant, Lowe's.

### 26 **STATUTORY AND REGULATORY BACKGROUND**

27 15. The State of California has enacted a comprehensive statutory and regulatory  
28 framework for the generation, handling, treatment, storage, transportation, and disposal of

1 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and  
2 Safety Code, sections 25100, et seq., and its implementing regulations, which are found at Title  
3 22 of the California Code of Regulations section 66260.1, et seq., mandates a “cradle to grave”  
4 system known as the Hazardous Waste Control Law (“HWCL”). The HWCL system is  
5 maintained to record the generation, registration, tracking, storage, treatment, and disposal of  
6 hazardous waste and to provide for the protection of the public and the environment from the  
7 potential risks posed by hazardous wastes. The State of California has enacted a comprehensive  
8 statutory and regulatory framework for the notification, handling, training and spill/release  
9 reporting of hazardous materials. This framework is contained in Chapter 6.95 of Division 20 of  
10 the Health and Safety Code, sections 25500, et seq., and its implementing regulations, known as  
11 the Hazardous Materials Release Response Plans and Inventory Law. In order to better inform  
12 the public and to assist emergency responders, Chapter 6.95 has, for over twenty (20) years,  
13 mandated that basic information on the location, type, quantity, and the health risks of hazardous  
14 materials handled, used, stored, or disposed of in the State, which could be accidentally released  
15 into the environment be made available to firefighters, health officials, planners, public safety  
16 officers, health care providers, regulatory agencies and other interested persons.

#### 17 **ENFORCEMENT AUTHORITY**

18 16. Section 25189 of the Health and Safety Code imposes civil liability for any  
19 negligent or intentional violation of the HWCL, or for any violation of any permit, rule,  
20 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section  
21 25189.2 is an alternative strict liability provision, which creates liability for any violation of the  
22 HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued or  
23 promulgated pursuant to the HWCL.

24 17. Business and Professions Code section 17206 imposes civil liability for any act of  
25 unfair competition, as defined in California Business and Professions Code section 17200.

26 18. Business and Professions Code section 17203 authorizes the Court to issue an  
27 order that enjoins any person who engages, has engaged, or proposes to engage in unfair  
28 competition, as defined in California Business and Professions Code section 17200.



1 Complaint, Defendants also generated regulated quantities of hazardous waste at each of  
2 Defendants' Facilities.

3 23. At all times relevant to this Complaint, Defendants are and were responsible for  
4 the operation of Defendants' Facilities. At all times relevant to this Complaint, Defendants are  
5 and were aware of and conducted, approved and/or controlled the hazardous materials, and  
6 hazardous waste management activities at Defendants' Facilities. At all times relevant to this  
7 Complaint, Defendants' actions and/or omissions, as part of a continuing course of conduct, are  
8 or were the legal cause of the violations alleged herein, and Defendants, or their predecessors  
9 reasonably could have taken action to prevent them.

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

13 25. Plaintiff is informed and believes and thereupon alleges that Lowe's violated, and  
14 New Orchard may have violated, provisions of the following statutes, including implementing  
15 regulations associated with each of the statutes and any related permit, rule, standard, or  
16 requirement issued or promulgated pursuant to these statutes, at Defendants' Facilities within the  
17 time period applicable to this action: Chapter 6.5 of the Health and Safety Code, sections 25100,  
18 et seq., Chapter 6.95 of the Health and Safety Code, sections 25500, et seq., Health and Safety  
19 Code sections 117600, et seq., and Business and Professions Code sections 17200, et seq.

20 26. Plaintiff alleges that Lowe's, at all times relevant hereto, caused and/or performed  
21 each of the acts and/or omissions in violation of California law in the ownership and/or operation  
22 of some or all of California Lowe's Facilities as alleged below:

- 23 a. Failed to determine if a generated waste, including but not limited to, items  
24 returned by customers to California Lowe's Facilities, and wastes generated at  
25 California Lowe's Facilities were hazardous wastes, as required by Title 22 of the  
26 California Code of Regulations section 66262.11, and, where such waste was  
27 hazardous, failed to handle such hazardous waste in accordance with the  
28 requirements of Chapter 6.5 of the Health and Safety Code and its implementing

1 regulations in Title 22 of the California Code of Regulations, including but not  
2 limited to section 66265.172 (compatible contents), and section 66265.177  
3 (placing incompatible waste streams in the same container);

- 4 b. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of  
5 the California Code of Regulations section 66260.200;
- 6 c. Failed to determine if hazardous waste had to be treated before it could be land  
7 disposed by testing the waste or using knowledge of the waste, in violation of Title  
8 22 of the California Code of Regulations section 66268.7, subdivision (a);
- 9 d. Failed to keep records of any test results, waste analysis, or other determinations  
10 made in accordance with Title 22 of the California Code of Regulations section  
11 66262.11 for at least three (3) years from the date that the waste was last sent to  
12 on-site or off-site treatment, storage, or disposal, in violation of Title 22 of the  
13 California Code of Regulations, section 66262.40(c);
- 14 e. Failed to properly manage, identify the date of accumulation, and label containers  
15 of hazardous waste at California Lowe's Facilities, in violation of California Code  
16 of Regulations, Title 22, section 66262.34;
- 17 f. Failed to properly manage, mark, and store hazardous waste aerosol cans, in  
18 violation of section 25201.16 of the California Health and Safety Code;
- 19 g. Failed to maintain containers holding hazardous waste at California Lowe's  
20 Facilities so as to prevent leaks, in violation of Title 22 of the California Code of  
21 Regulations section 66265.173 and Code of Federal Regulations section 265.171;  
22 and, where applicable, failure to provide adequate secondary containment.
- 23 h. Failed to keep containers of hazardous waste closed, except when removing or  
24 adding hazardous waste, in violation of Title 22 of the California Code of  
25 Regulations section 66265.173;
- 26 i. Failed to comply with employee training obligations pertaining to handling of  
27 hazardous waste at California Lowe's Facilities, in violation of California Code of  
28 Regulations, Title 22, section 66265.16.

- 1 j. Treated, stored, disposed of, transported, and offered for transportation, hazardous  
2 waste without having received and used a proper identification number from the  
3 U.S. Environmental Protection Agency or the California Department of Toxic  
4 Substances Control (“DTSC”) for the originating facility, in violation of Title 22  
5 of the California Code of Regulations section 66262.12, subdivision (a);
- 6 k. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous  
7 waste facilities permit, in violation of Health and Safety Code section 25201(a)  
8 and Title 22 of the California Code of Regulations section 66270.1;
- 9 l. Stored hazardous waste onsite beyond the time permitted by law at a facility which  
10 did not have a hazardous waste storage permit from DTSC, in violation of Title 22  
11 of the California Code of Regulations section 66262.34, and California Health and  
12 Safety Code section 25123.3, subdivision (h);
- 13 m. Disposed, or caused the disposal of, hazardous waste at a point not authorized, in  
14 violation of Health and Safety Code sections 25189 and 25189.2, including at non-  
15 hazardous landfills and other locations not authorized to receive hazardous waste;
- 16 n. Failed to prepare and maintain copies of hazardous waste manifests for three (3)  
17 years, in violation of Title 22 of the California Code of Regulations sections  
18 66262, et seq; and failed to retain documentation demonstrating the applicability  
19 of claimed exemptions. As used in this paragraph, “manifest” means a shipping  
20 document originated and signed by a generator of hazardous waste that contains all  
21 of the information required by law and that complies with all applicable federal  
22 and state regulations, and includes but is not limited to, receipts;
- 23 o. Failed to submit to DTSC a legible copy of each manifest used within thirty (30)  
24 days of each shipment of hazardous waste off-site or into California, in violation  
25 of Title 22 of the California Code of Regulations section 66262.23, subdivision  
26 (a)(4);
- 27 p. Failed to timely provide a manifest or contact the transporter and/or the owner or  
28 operator of the designated facility which was to receive the hazardous waste to

1 determine the status of the hazardous waste after the generator did not receive a  
2 copy of the manifest with the handwritten signature of the owner or operator of the  
3 designated facility within thirty-five (35) days of the date the waste was accepted  
4 by the initial transporter, in violation of Title 22 of the California Code of  
5 Regulations section 66262.42;

- 6 q. Failed to submit an Exception Report to DTSC after the generator did not receive a  
7 copy of the manifest with the handwritten signature of the owner or operator of the  
8 designated facility which was to receive the hazardous waste within sixty (60)  
9 days of the date the waste was accepted by the initial transporter, in violation of  
10 Title 22 of the California Code of Regulations section 66262.42, subdivision (b)  
11 and Health and Safety Code section 25123.3(h)(2);
- 12 r. Failed to comply with the requirements of Title 40 of the Code of Federal  
13 Regulations section 262.34, subdivisions (d) – (f), requiring generators to  
14 designate an employee at all times as the emergency coordinator and post the  
15 required information listed on Section 262.34, subdivision (d)(5)(i) - (iv), in  
16 violation of Title 22 of the California Code of Regulations section 66262.34,  
17 subdivision (d)(2);
- 18 s. Failed to properly manage, mark, and store universal waste, in violation of Title 22  
19 of the California Code of Regulations sections 66273.33 – 66273.36;
- 20 t. Failed to keep a record with the information required by section 66273.39,  
21 subdivisions (a)(1) – (3), of each shipment of universal waste received at the  
22 universal waste handler’s facility, in violation of Title 22 of the California Code of  
23 Regulations section 66273.39;
- 24 u. Failed to treat returned or discarded non-empty aerosol cans at California Lowe’s  
25 Facilities as universal waste or hazardous waste, in violation of California Code of  
26 Regulations, Title 22, Chapter 23, sections 66273.1, et seq.
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- 1 v. Failed to label containers of hazardous waste before transporting hazardous waste  
2 from California Lowe's Facilities in violation of California Code of Regulations,  
3 Title 22, section 66262.31;
- 4 w. Transported hazardous waste to unauthorized locations in violation of California  
5 Code of Regulations, Title 22, section 66263.23;
- 6 x. Transported hazardous waste at, to, from and between California Lowe's Facilities  
7 on vehicles that did not hold a valid registration issued by the DTSC, in violation  
8 of Health and Safety Code section 25163;
- 9 y. Failed to implement, maintain and comply with, an employee training program  
10 meeting the requirements of Health and Safety Code section 25505, subdivision  
11 (a)(4), and Title 19 of the California Code of Regulations section 2732, pertaining  
12 to hazardous materials, and business and area plans, including but not limited to  
13 Hazardous Materials Business Plans;
- 14 z. Failed to implement and maintain a business emergency plan for emergency  
15 response to a release or threatened release of hazardous materials, in violation of  
16 Health and Safety Code section 25507;
- 17 aa. Failed to implement, maintain or to submit to the unified program agency (as  
18 defined in Health and Safety Code sections 25501 and 25502), a complete  
19 hazardous materials business plan for each of California Lowe's Facilities, in  
20 violation of Health and Safety Code sections 25505 and 25508, and section 2729  
21 of Title 19 of the California Code of Regulations;
- 22 bb. Failed to comply with the California Medical Waste Management Act, Health and  
23 Safety Code sections 117600, et seq., by failing to have a Medical Waste  
24 Management Plan, failing to retain on file disposal receipts and tracking  
25 documents for waste shipped offsite for two (2) years;
- 26 cc. Caused to be deposited, without the permission of the owner, hazardous substances  
27 upon the land of another, in a manner that is a violation of Penal Code section  
28 374.8, subdivision (b); and

1 dd. Allowed hazardous waste to remain, after causing its deposit, at a point not  
2 authorized, without immediately filing a report of the deposit with the DTSC and  
3 complying with any order by the DTSC, in violation of Health & Safety Code  
4 sections 25189, subd. (d) and 25189.2, subd. (c).

5 27. Plaintiff alleges that New Orchard, at all times relevant hereto, may have caused  
6 and/or performed some or all of the acts and/or omissions in violation of California law in the  
7 ownership and/or operation of some or all of California and Oregon Orchard Facilities as alleged  
8 in paragraph 26, subdivisions (a) through (dd), inclusive.

9 28. Defendants' noncompliance with the above statutes and regulations threatened  
10 public health and safety and the environment.

11 **FIRST CAUSE OF ACTION**

12 (Disposal of Hazardous Waste at a Point not Authorized)  
13 (Health & Saf. Code, §§ 25189, 25189.2)

14 29. Plaintiff realleges paragraphs 1 through 28, inclusive.

15 30. Health and Safety Code sections 25189 and 25189.2 prohibit the disposal of  
16 hazardous waste at a point not authorized under Chapter 6.5. Section 25189, subdivisions (c) and  
17 (d), respectively, prohibit the intentional or negligent disposal of hazardous waste at an  
18 unauthorized point, and section 25189.2, subdivision (c) prohibits the disposal of hazardous waste  
19 at an unauthorized point as a matter of strict liability.

20 31. Lowe's disposed and/or caused the disposal, and New Orchard may have disposed  
21 and/or caused the disposal, of hazardous waste at and from Defendants' Facilities at unauthorized  
22 points, in violation of California Health and Safety Code sections 25189 and 25189.2.

23 32. Each disposal of hazardous waste at an unauthorized point that occurred within  
24 five (5) years before the discovery of the facts constituting grounds for commencing the action on  
25 these claims, in addition to the Tolling Period set forth in paragraph 14 herein, and each day the  
26 waste was allowed to remain at such point without the immediate filing of a report of the deposit  
27 with the DTSC, subjects Defendants to a separate and additional civil penalty under Health and  
28 Safety Code section 25189, or alternatively under section 25189.2.





1 \$2,000.00 for each day in which the violation occurred, pursuant to Health and Safety Code  
2 section 25515, subdivision (a).

3 46. As a consequence of Defendants' knowing violation of any of these sections,  
4 Defendants are liable for a civil penalty that must be imposed for each separate violation in an  
5 amount up to \$5,000.00 for each day in which the violation occurred, pursuant to Health and  
6 Safety Code section 25515, subdivision (b).

7 47. Based on the above, the People request injunctive relief against Defendants under  
8 Health and Safety Code sections 25515.6 and 25515.8, as described in the People's prayer for  
9 relief.

10 **FIFTH CAUSE OF ACTION**  
11 (Violations of Unfair Competition Laws)  
12 (Business & Professions Code sections 17200, *et seq.*)

13 48. Plaintiff realleges paragraphs 1 through 47, inclusive.

14 49. Within four (4) years of the date of commencement of this action, exclusive of the  
15 Tolling Period set forth in paragraph 14 herein, Lowe's engaged in, and New Orchard may have  
16 engaged in, unlawful acts, omissions, and practices that constitute unfair competition within the  
17 meaning of Business and Professions Code sections 17200 through 17208, including but not  
18 limited to, the acts or omissions and practices alleged in the First through Fourth Causes of  
19 Action, above, and unless enjoined by order of the Court, Defendant may or will continue in the  
20 course of conduct as alleged herein.

21 50. Each and every separate act constitutes an unlawful and/or unfair business  
22 practice. Each day that Defendants engaged in each separate unlawful act, omission or practice is  
23 a separate and distinct violation of Business and Professions Code section 17200.

24 51. Pursuant to Business and Professions Code section 17206, Defendants are liable  
25 for civil penalties for each and every separate act of unfair competition as alleged herein.

26 52. Defendants must be immediately and permanently enjoined, pursuant to Business  
27 and Professions Code section 17203, from engaging in acts or practices that, as alleged in this  
28 Complaint, violate Chapter 6.5 and/or 6.95 of Division 20 of the Health and Safety Code and their  
implementing regulations, Health and Safety Code section 117600 *et seq.*, and county and local

1 ordinances pertaining to hazardous waste generator permits, which thereby constitute unfair  
2 competition within the meaning of Business and Professions Code section 17200.

3 **PRAYER FOR RELIEF**

4 Based on the above, the People request the following relief as to Defendants:

5 1. A Permanent Injunction requiring Defendants to comply with those provisions of  
6 Health and Safety Code, Division 20, Chapter 6.5 and implementing regulations, which  
7 Defendants are alleged to have violated;

8 2. A Permanent Injunction requiring Defendants to comply with those provisions of  
9 Health and Safety Code, Division 20, Chapter 6.95 and implementing regulations, which  
10 Defendants are alleged to have violated;

11 3. A Permanent Injunction, issued pursuant to Business and Professions Code section  
12 17203, prohibiting Defendants from engaging in activity that violates the provisions of Chapters  
13 6.5 and 6.95 of Division 20 of the Health and Safety Code, and Health and Safety Code sections  
14 117600, et seq., as alleged in this Complaint which thereby constitute unfair competition within  
15 the meaning of Business and Professions Code section 17200;

16 4. Civil penalties against Defendants for each violation of Health and Safety Code  
17 section 25189, or alternatively section 25189.2, in an amount according to proof;

18 5. Civil penalties against Defendants pursuant to Health and Safety Code sections  
19 25515 and 25515.5, in an amount according to proof;

20 6. Civil penalties against Defendants pursuant to Business and Professions Code  
21 section 17206 for each act of unfair competition, in an amount according to proof;

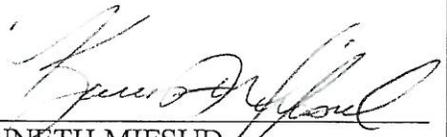
22 7. Plaintiff's costs of inspection, investigation, attorney's fees, enforcement,  
23 prosecution, and suit herein; and

24 8. Such other and further relief as the Court deems just and proper.  
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Dated: 3-25-14

NANCY E. O'MALLEY, District Attorney  
County of Alameda, State of California

By:   
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Senior Deputy District Attorney  
Attorneys for Plaintiff  
The People of the State of California

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## Exhibit A-1 - California Lowe's Facilities

	Store #	Street Address	City	County	Date Closed
1	2273	3750 Dublin Boulevard	Dublin	Alameda	
2	1895	43612 Pacific Commons Blvd.	Fremont	Alameda	
3	1150	4255 First Street	Livermore	Alameda	
4	1132	32040 Union Landing Blvd.	Union City	Alameda	
5	2335	12071 Industry Boulevard	Martell	Amador	
6	1201	2350 Forest Avenue	Chico	Butte	
7	1043	1951 Auto Center Drive	Antioch	Contra Costa	
8	2604	1935 Arnold Industrial Way	Concord	Contra Costa	
9	2508	5503 Lone Tree Way	S. Antioch	Contra Costa	
10	1541	875 Shaw Avenue	Clovis	Fresno	
11	795	7651 North Blackstone Avenue	Fresno	Fresno	
12	2550	2053 North Imperial Avenue	El Centro	Imperial	
13	790	7825 Rosedale Highway	Bakersfield	Kern	
14	2424	1601 Columbus Street	N. E. Bakersfield	Kern	
15	1708	6200 Colony Street	S. Bakersfield	Kern	
16	2215	1955 West Lacey Boulevard	Hanford	Kings	
17	1144	2000 Empire Avenue	Burbank	Los Angeles	
18	785	2840 Bellflower Blvd.	Central Long Beach (Los Altos)	Los Angeles	
19	3151	1348 North Azusa Avenue	Covina	Los Angeles	
20	2547	37080 47th Street East	E. Palmdale	Los Angeles	
21	1972	19001 Golden Valley Road	E. Santa Clarita	Los Angeles	
22	1555	2800 W. 120th Street	Hawthorne	Los Angeles	
23	2502	730 West Avenue K	Lancaster	Los Angeles	
24	2714	4550 West Pico Boulevard, Unit D-101	Mid-City Los Angeles	Los Angeles	
25	773	7300 East Carson Street	N.E. Long Beach	Los Angeles	
26	1873	19601 West Nordhoff Street	Northridge	Los Angeles	
27	56	14873 Carmenita Road	Norwalk	Los Angeles	
28	1852	13500 Paxton Street	Pacoima	Los Angeles	
29	791	39500 Lowes Drive	Palmdale	Los Angeles	
30	1591	8600 Washington Boulevard	Pico Rivera	Los Angeles	
31	1872	17789 Castleton Street	Puente Hills	Los Angeles	
32	1170	633 West Bonita Avenue	San Dimas	Los Angeles	
33	1510	26415 Bouquet Canyon Road	Santa Clarita	Los Angeles	
34	250	22255 Western Avenue	Torrance	Los Angeles	
35	2268	2700 Skypark Drive	W. Torrance	Los Angeles	
36	1162	8383 Topanga Canyon Blvd.	West Hills	Los Angeles	
37	2712	2100 West Cleveland Avenue	Madera	Madera	
38	2445	1301 West Pacheco	Los Banos	Merced	11/13/2011
39	1672	1750 West Olive Avenue	Merced	Merced	
40	1900	26501 Aliso Creek Road	Aliso Viejo	Orange	
41	1030	1500 N. Lemon Street	Anaheim	Orange	
42	1753	8175 Warner Avenue	Huntington Beach	Orange	
43	769	13300 Jamboree Road	Irvine	Orange	
44	1562	1380 South Beach Boulevard	La Habra	Orange	
45	758	30481 Avenida De Las Flores	Rancho Santa Margarita	Orange	
46	1050	907 Avenida Pico	San Clemente	Orange	
47	2605	2500 Park Avenue	Tustin	Orange	
48	49	13225 Beach Blvd.	Westminster	Orange	10/17/2011
49	2499	535 South Highway 65	N. Lincoln	Placer	
50	1207	10201 Fairway Drive	N. Roseville	Placer	
51	1429	864 West 4th Street	Beaumont	Riverside	
52	1743	1285 Magnolia Avenue	Corona	Riverside	

## Exhibit A-1 - California Lowe's Facilities

	Store #	Street Address	City	County	Date Closed
53	1556	350 South Sanderson Avenue	Hemet	Riverside	
54	208	78-865 Highway 111	La Quinta	Riverside	
55	1987	29335 Central Avenue	Lake Elsinore	Riverside	
56	2294	30472 Haun Road	Menifee	Riverside	
57	2330	6413 Pats Ranch Road	Mira Loma	Riverside	
58	1574	12400 Day Street	Moreno Valley	Riverside	
59	1450	16850 Heacock Street	Moreno Valley	Riverside	
60	1576	24701 Madison Avenue	Murrieta	Riverside	
61	2583	35900 Monterey Avenue	Palm Desert	Riverside	
62	1026	5201 East Ramon Road	Palm Springs	Riverside	
63	966	3984 Indian Avenue	Perris	Riverside	
64	1048	9851 Magnolia Avenue	Riverside	Riverside	
65	775	40390 Winchester Road	Temecula	Riverside	
66	1540	7840 Greenback Lane	Citrus Heights	Sacramento	
67	1148	8369 Power Inn Road	Elk Grove	Sacramento	
68	1087	800 East Bidwell Street	Folsom	Sacramento	
69	2341	3251 Zinfandel Drive	Rancho Cordova	Sacramento	
70	2528	12189 Apple Valley Road	Apple Valley	San Bernardino	
71	316	13251 Peyton Drive	Chino Hills	San Bernardino	
72	2856	27847 Greenspot Road	Highland	San Bernardino	
73	2720	15000 Dale Evans Pkwy.	N. Apple Valley	San Bernardino	11/7/2010
74	1700	16851 Sierra Lakes Parkway	N. Fontana	San Bernardino	
75	1960	4060 N. Hallmark Pkwy.	N. San Bernardino	San Bernardino	11/7/2010
76	2270	2390 South Grove Avenue	Ontario	San Bernardino	
77	774	11399 Foothill Blvd.	Rancho Cucamonga	San Bernardino	
78	759	1725 West Redlands Blvd.	Redlands	San Bernardino	
79	2783	4777 Chino Hills Parkway	S. Chino Hills	San Bernardino	
80	1041	1659 W. Foothill Blvd.	Upland	San Bernardino	
81	1001	14333 Bear Valley Road	Victorville	San Bernardino	
82	2331	2515 Palomar Airport Road	Carlsbad	San Diego	
83	1742	2225 Otay Lakes Road	Eastlake (Chula Vista)	San Diego	
84	2481	620 West Mission Avenue	Escondido	San Diego	
85	1013	2318 Northside Drive	Mission Valley	San Diego	
86	1588	155 Old Grove Road	Oceanside	San Diego	
87	1697	555 Grand Avenue	San Marcos	San Diego	9/12/2013
88	1661	9416 Mission Gorge Road	Santee	San Diego	
89	1616	151 Vista Village Drive	Vista	San Diego	
90	3095	491 Bayshore Boulevard	San Francisco	San Francisco	
91	1545	3645 East Hammer Lane	E. Stockton	San Joaquin	
92	1706	1389 S. Lower Sacramento Road	Lodi	San Joaquin	
93	2227	10342 Trinity Parkway	N. Stockton	San Joaquin	
94	1430	Luce Avenue, Building 512	Stockton	San Joaquin	
95	2730	2445 Golden Hill Road	Paso Robles	San Luis Obispo	
96	1019	1340 El Camino Real	San Bruno	San Mateo	
97	2452	720 Dubuque Avenue	South San Francisco	San Mateo	
98	2842	750 Newhall Drive	Central San Jose	Santa Clara	
99	2790	775 Ridder Park Drive	E. San Jose	Santa Clara	
100	1552	7151 Camino Arroyo	Gilroy	Santa Clara	
101	1756	5550 Cottle Road	S. San Jose	Santa Clara	
102	2211	811 East Arques Avenue	Sunnyvale	Santa Clara	
103	1926	1200 East Cypress Avenue	Redding	Shasta	
104	3164	3400 North Texas Street	Fairfield	Solano	

Exhibit A-1 - California Lowe's Facilities

	Store #	Street Address	City	County	Date Closed
105	1143	1751 East Monte Vista Avenue	Vacaville	Solano	
106	1871	401 Columbus Parkway	Vallejo	Solano	
107	1901	7921 Redwood Drive	Cotati	Sonoma	
108	1086	3801 Pelandale Avenue	Modesto	Stanislaus	
109	2334	3303 Entertainment Way	Turlock	Stanislaus	
110	1933	935 Tharp Road	Yuba City	Sutter	
111	2660	3020 North Demaree Street	N. Visalia	Tulare	
112	2278	500 West Vandalia Avenue	Porterville	Tulare	
113	2473	1145 East Prosperity Avenue	Tulare	Tulare	
114	1611	4144 South Mooney Boulevard	Visalia	Tulare	
115	2279	120 Old Wards Ferry Road	Sonora	Tuolumne	
116	1734	500 South Mills Road	Central Ventura	Ventura	
117	1941	301 W. Gonzales Road	Oxnard	Ventura	
118	1971	1275 Simi Town Center Way	Simi Valley	Ventura	
119	2755	2250 Lake Washington Boulevard	West Sacramento	Yolo	

## Exhibit A-2 - California and Oregon Orchard Facilities

Store#	Street Address	City	County
0470	1025 Ashby Ave.	Berkeley	Alameda
0120	7884 Dublin Blvd.	Dublin	Alameda
0100	Mowry East Shopping Center 5130 Mowry Ave.	Fremont	Alameda
0070	Vintner Square, 1450 First St.	Livermore	Alameda
0320	300 Floresta Blvd.	San Leandro	Alameda
0381	231 West East Avenue	Chico	Butte
0240	2050 Monument Blvd.	Concord	Contra Costa
0251	Clayton Valley Shopping Center, 5424 Ygnacio Valley Rd.	Concord	Contra Costa
0421	1550 Canyon Road	Moraga	Contra Costa
0350	Pinole Vista, 1440 Fitzgerald Drive	Pinole	Contra Costa
0390	1041 Market Place	San Ramon	Contra Costa
0150	Wild West Shopping Center, 147 W. Shaw Ave.	Clovis	Fresno
0360	5445 N. Blackstone Avenue	Fresno	Fresno
0441	1536 East Champlain Drive	Fresno	Fresno
0460	5653 East Kings Canyon Road	Fresno	Fresno
0711	6055 North Figarden Drive	Fresno	Fresno
0850	6465 Ming Ave.	Bakersfield	Kern
0580	700 11th Avenue	Hanford	Kings
0840	18060 Chatsworth St.	Granada Hills	Los Angeles
0700	3100 Foothill Blvd.	La Crescenta	Los Angeles
0221	2244 Foothill Blvd.	La Verne	Los Angeles
0751	401 South La Brea Ave.	Los Angeles	Los Angeles
0590	3425 E. Colorado Blvd.	Pasadena	Los Angeles
0610	452 Fair Oaks Avenue	So. Pasadena	Los Angeles
0721	19330 Hawthorne Blvd.	Torrance	Los Angeles
0630	5960 Sepulveda Blvd.	Van Nuys	Los Angeles
0640	2020 S. Bundy Dr.	West LA	Los Angeles
0410	1151 Andersen Drive	San Rafael	Marin
0250	1067 North Davis Road	Salinas	Monterey
0440	Sand Dollar Shopping Center, 800 Playa Ave.	Sand City	Monterey
0370	3980 Bel Aire Plaza	Napa	Napa
0731	17506 Yorba Linda Blvd.	Yorba Linda	Orange
0211	4249 Elverta Road	Antelope	Sacramento
0081	7431 Laguna Blvd.	Elk Grove	Sacramento
0091	905 E. Bidwell St.	Folsom	Sacramento
0241	3350 Arden Way	Sacramento	Sacramento
0521	Midtown Square Shopping Center, 16824 Main Street	Hesperia	San Bernardino
0530	189 West Louise Avenue	Manteca	San Joaquin
0180	1015 West Hammer Lane	Stockton	San Joaquin
0371	1975 West 11th Street	Tracy	San Joaquin
0361	The Crossings at Paso Robles, 2005 Theatre Dr.	Paso Robles	San Luis Obispo
0670	825 Oak Park Rd.	Pismo Beach	San Luis Obispo
0430	1010 Metro Center Blvd.	Foster City	San Mateo
0210	900 El Camino Real	Millbrae	San Mateo
0220	2110 Middlefield Road	Redwood City	San Mateo

## Exhibit A-2 - California and Oregon Orchard Facilities

Store#	Street Address	City	County
0540	2245 Gellert Blvd.	S. San Francisco	San Mateo
0660	125 N. Fairview	Goleta	Santa Barbara
0450	1950 South Broadway	Santa Maria	Santa Barbara
0200	303 E. 10th Street	Gilroy	Santa Clara
0190	125 N. Milpitas Blvd.	Milpitas	Santa Clara
0690	2555 Charleston Rd.	Mountain View	Santa Clara
0010	720 W. San Carlos Street	San Jose	Santa Clara
0020	3000 Alum Rock Avenue	San Jose	Santa Clara
0050	777 Sunnyvale-Saratoga Rd.	Sunnyvale	Santa Clara
0160	Silver Creek Plaza, 1751 East Capitol Expwy	San Jose	Santa Clara
0170	5651 Cottle Road	San Jose	Santa Clara
0280	5365 Prospect Road	San Jose	Santa Clara
0691	Princeton Plaza Shopping Ctr., 1375 Blossom Hill Road, Suite 24	San Jose	Santa Clara
0290	3615 El Camino Real	Santa Clara	Santa Clara
0060	1601 41st Avenue	Capitola	Santa Cruz
0260	1060 S. Green Valley Road	Watsonville	Santa Cruz
0680	2340 Athens Ave.	Redding	Shasta
0550	1390 N. McDowell Blvd.	Petaluma	Sonoma
0431	2230 Cleveland Avenue	Santa Rosa	Sonoma
0090	2800 Sisk Rd.	Modesto	Stanislaus
0201	1800 Oakdale Rd., Suite A	Modesto	Stanislaus
0380	3051 Geer Road	Turlock	Stanislaus
0420	2230 W. Walnut Avenue	Visalia	Tulare
0570	750 E. Mono Way	Sonora	Tuolumne
0750	1934 E. Avenida De Los Arboles	Thousand Oaks	Ventura
0740	1350 E Main St.	Woodland	Yolo
0761	Peterkort Town Square, 10860 SW Barnes Rd.	Portland, Oregon	Multnomah
0741	10031 SW Cascade Avenue	Tigard, Oregon	Washington
DC	2650 N. MacArthur Drive	Tracy	San Joaquin
DC Annex	1959 E. Grantline Rd., Suite 310	Tracy	San Joaquin