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9 *Attorneys for Plaintiff,*
10 *The People of the State of California*

11 *[Additional Counsel Continued on Attachment A]*

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF ALAMEDA

14 THE PEOPLE OF THE STATE OF
CALIFORNIA,

15 Plaintiffs,

16 v.

17 DOLLAR TREE STORES, INC.,

18 a Virginia Corporation, and DOLLAR
19 TREE DISTRIBUTION, INC., a Virginia
20 Corporation

21 Defendants.
22

Case No. **1615767714**

**COMPLAINT FOR PERMANENT
INJUNCTION, CIVIL PENALTIES AND
OTHER EQUITABLE RELIEF**

(Health & Saf. Code, Div. 20, Chapters 6.5,
and 6.95; Health & Saf. Code §§ 117600, *et*
seq.; Bus. & Prof. Code § 17200, *et seq.*)

*Exempt from fees per
Government Code §6103*

23
24 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA ("People"), based on
25 information and belief, alleges as follows:

26 **PLAINTIFF**

27 1. The People bring this action and by and through Nancy O'Malley, District
28 Attorney of Alameda County; Todd D. Riebe, District Attorney of Amador County; Michael L.

**ENDORSED
FILED
ALAMEDA COUNTY**

APR 24 2015

CLERK OF THE SUPERIOR COURT
By J:IANNA L. SHORE Deputy

1 Ramsey, District Attorney of Butte County; Mark A. Peterson, District Attorney of Contra
2 Costa County; Dale Trigg, District Attorney of Del Norte County; Vern Pierson, District
3 Attorney of El Dorado County; Lisa A. Smittcamp, District Attorney of Fresno County; Duane
4 Stewart, District Attorney of Glenn County; Maggie Fleming, District Attorney of Humboldt
5 County; Lisa S. Green, District Attorney of Kern County; Keith Fagundes, District Attorney of
6 Kings County; Don A. Anderson, District Attorney of Lake County; Stacey L. Montgomery,
7 District Attorney of Lassen County; Michael N. Feuer, City Attorney of Los Angeles; Jackie
8 Lacey, District Attorney of Los Angeles County; David Linn, District Attorney of Madera
9 County; Edward S. Berberian, Jr., District Attorney of Marin County; C. David Eyster, District
10 Attorney of Mendocino County; Larry D. Morse II, District Attorney of Merced County; Dean
11 D. Flippo, District Attorney of Monterey County; Clifford Newell, District Attorney of Nevada
12 County; Tony Rackauckas, District Attorney of Orange County; R. Scott Owens, District
13 Attorney of Placer County; David Hollister, District Attorney Plumas County; Mike Hestrin,
14 District Attorney of Riverside County; Anne Marie Schubert, District Attorney of Sacramento
15 County; Candice Hooper-Mancino, District Attorney of San Benito County; Michael A. Ramos,
16 District Attorney of San Bernardino County; Jan Goldsmith, City Attorney of San Diego;
17 Bonnie M. Dumanis, District Attorney of San Diego County; Tori Verber Salazar, District
18 Attorney of San Joaquin County; Dan Dow, District Attorney of San Luis Obispo County;
19 Stephen M. Wagstaffe, District Attorney of San Mateo County; Joyce E. Dudley, District
20 Attorney of Santa Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara County;
21 Jeffrey S. Rosell, District Attorney of Santa Cruz County; Stephen Carlton, District Attorney of
22 Shasta County; J. Kirk Andrus, District Attorney of Siskiyou County; Krishna A. Abrams,
23 District Attorney of Solano County; Jill R. Ravitch, District Attorney of Sonoma County; Birgit
24 A. Fladager, District Attorney of Stanislaus County; Amanda Hopper, District Attorney of
25 Sutter County; Gregg Cohen, District Attorney of Tehama County; Tim Ward, District Attorney
26 of Tulare County; Laura Krieg, District Attorney of Tuolumne County; Gregory D. Totten,
27 District Attorney of Ventura County; Jeff W. Reisig, District Attorney of Yolo County; and,
28 Patrick McGrath, District Attorney of Yuba County (collectively "Prosecutors").

1 through agents and affiliates in the State of California. Dollar Tree Stores, Inc. and Dollar Tree
2 Distribution Inc. are hereafter referred to as “Defendants” or “Dollar Tree.”

3 9. Dollar Tree does and did business in its own capacity and/or through agents
4 and affiliates in the State of California at the facilities identified in Exhibit A (hereinafter
5 collectively referred to as “California Facilities”). The California Facilities are located
6 throughout California.

7 10. The People are informed and believe, and thereon allege, that Dollar Tree is the
8 owner and/or operator of the California Facilities.

9 11. At all times relevant hereto, Dollar Tree has stocked, transported, stored and sold
10 hazardous materials at and from the California Facilities. These hazardous materials include,
11 but are not limited to, over-the-counter medications, pharmaceuticals, aerosol products,
12 ignitable liquids, batteries, electronic devices, and other toxic, reactive, ignitable and/or
13 corrosive materials. Dollar Tree also generated regulated quantities of hazardous waste at each
14 of the California Facilities as a result of various causes including, but not limited to, damage to
15 containers, spills and releases of hazardous materials, pharmaceutical waste, and various
16 hazardous wastes generated from customer returns of hazardous products.

17 12. At all times relevant hereto, Dollar Tree was and is legally responsible for
18 compliance with the provisions of the Health and Safety Code, including Chapters 6.5 and 6.95
19 of Division 20 and sections 117600, *et seq.*, at the California Facilities. The People are
20 informed and believe, and based thereon allege that, at all relevant times, Dollar Tree
21 controlled, managed, directed and was responsible for the operations of the California Facilities,
22 and/or aided and abetted, managed, directed or acted in concert with persons who exercised
23 control over those operations. The People are informed and believe, and based thereon allege,
24 that at all relevant times, Dollar Tree was legally responsible for all acts and omissions of its
25 officers, directors, agents, employees, contractors, vendors, affiliates, and/or representatives
26 relating to the management of hazardous materials and hazardous waste, and medical waste, at
27 the California Facilities, and/or that Dollar Tree failed to take appropriate steps to prevent
28

1 and/or correct the violations alleged herein despite having power, authority and notice sufficient
2 to do so.

3 13. Dollar Tree is a “person,” as defined in Health and Safety Code sections 25118
4 and 117745 and Business & Professions Code section 17201, and a “business,” as defined in
5 Health and Safety Code section 25501, subdivision (c).

6 14. When reference is made herein to any act or omission of Dollar Tree, such
7 allegation shall include the act or omission of the owners, officers, directors, agents, employees,
8 contractors, vendors, affiliates, and/or representatives of Dollar Tree, engaged in said act or
9 omission.

10 15. The identities of DOES 1 – 25 are unknown to Plaintiff at this time. At such time
11 as the identities of DOE Defendants become known, Plaintiff will amend this Complaint
12 accordingly. DOES 1 – 25 are, and at all times relevant to the claims in this Complaint were,
13 legally responsible for compliance with the provisions of California Health and Safety Code
14 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
15 implementing regulations, and sections 117600, *et seq.*, in connection with the ownership and/or
16 operation of the California Facilities. Dollar Tree and DOES 1 – 25 are collectively referred to
17 herein as “Defendants.”

18 16. At all times relevant hereto, DOES 1 – 25 were in a position of responsibility
19 allowing them to influence corporate policies or activities with respect to Dollar Tree’s
20 compliance with California environmental laws and regulations at the California Facilities, and
21 had, by reason of their position in the limited liability company, responsibility and authority
22 either to prevent in the first instance, or promptly to correct, the violations complained of
23 herein, but failed to do so. In addition to any direct personal liability of these individuals,
24 DOES 1 – 25 also are personally liable under the “responsible corporate officer doctrine” for
25 violations of law committed by Dollar Tree as alleged herein.

26 JURISDICTION AND VENUE

27 17. Venue is proper in this County pursuant to Health and Safety Code sections
28 25183 and 25515.6, and Business and Professions Code sections 17200, *et seq.*, in that certain

1 of the violations alleged in the Complaint occurred in the County of Alameda and throughout
2 the State of California. This Court has jurisdiction pursuant to Article 6, section 10 of the
3 California Constitution and Code of Civil Procedure section 393.

4 18. Plaintiff and Dollar Tree have entered into a series of agreements to toll any
5 applicable statutes of limitation. As a result of these agreements, the period of time from
6 October 15, 2013, through April 1, 2015, inclusive (the "Tolling Period") will not be included
7 in computing the time limited by any statutes of limitation applicable to the claims covered by
8 the tolling agreement.

9 **STATUTORY AND REGULATORY BACKGROUND**

10 19. The State of California has enacted a comprehensive statutory and regulatory
11 framework for the generation, handling, treatment, storage, transportation, and disposal of
12 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and
13 Safety Code, sections 25100, *et seq.*, and its implementing regulations, which are found at Title
14 22 of the California Code of Regulations section 66260.1, *et seq.*, mandates a "cradle to grave"
15 system known as the Hazardous Waste Control Law ("HWCL"). The HWCL system is
16 maintained to record the generation, registration, tracking, storage, treatment, and disposal of
17 hazardous wastes and to provide for the protection of the public and the environment from
18 present or potential risks posed by hazardous wastes.

19 20. The HWCL is the California analog of the Federal Resource Conservation and
20 Recovery Act, 42 U.S.C. section 6901, *et seq.* ("RCRA"). Pursuant to state and federal law, the
21 California Department of Toxic Substances Control ("DTSC") administers the HWCL in lieu of
22 federal administration of RCRA in California. (See Health & Saf. Code, § 25101, subdivision
23 (d).) Federal law prohibits California from imposing "any requirements less stringent than
24 those authorized under [RCRA]." (42 U.S.C. § 6929.)

25 21. The HWCL has, in certain instances, a more inclusive definition of hazardous
26 waste than federal law. Hazardous wastes that are regulated under California law but not
27 federal law are known as "non-RCRA hazardous wastes." (Health & Saf. Code, § 25117.9.)

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1 Health and Safety Code, or for any violation of a regulation promulgated pursuant to the
2 MWMA.

3 27. Business and Professions Code section 17206 imposes civil liability for any act
4 of unfair competition, as defined in California Business and Professions Code section 17200.

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

8 29. Health and Safety Code sections 25181 and 25184 authorize the Court to issue
9 an order that enjoins any ongoing or potential violation of the HWCL, or of any applicable rule,
10 regulation, permit, standard, requirement, or order issued or promulgated pursuant to the
11 HWCL.

12 30. Health and Safety Code sections 25515.6 and 25515.7 authorize the Court to
13 issue an order that enjoins any ongoing or potential violation of Chapter 6.95.

14 31. Health and Safety Code section 118325 authorizes the Court to issue an order
15 that enjoins any ongoing or potential violation of the MWMA.

16 32. Health and Safety Code sections 25184, 25515.8, and 118325 provide that in
17 civil actions brought pursuant to the HWCL, Chapter 6.95, or MWMA, respectively, in which
18 an injunction or temporary restraining order is sought, it shall not be necessary for the People to
19 allege or prove at any stage of the proceeding that irreparable damage will occur should the
20 temporary restraining order, preliminary injunction, or permanent injunction not be issued, or
21 that the remedy at law is inadequate, and the temporary restraining order, preliminary
22 injunction, or permanent injunction shall issue without such allegations and without such proof.

23 **GENERAL ALLEGATIONS**

24 33. At all times relevant hereto and continuing from and after the date of filing of
25 this Complaint, Defendants owned and/or operated, and continue to own and/or operate, and are
26 responsible for acts and/or omissions committed at, over 480 California Facilities throughout
27 California, including retail stores and regional distribution centers. At all times relevant hereto
28 and continuing from and after the date of filing of this Complaint, Defendants, and each of

1 them, handled at the California Facilities enormous volumes of hazardous materials including,
2 but not limited to, over-the-counter medications, bleaches, batteries, electronic devices,
3 ignitable liquids, aerosol products, oven cleaners and various other cleaning agents, and other
4 ignitable, reactive, toxic, corrosive, and biohazard materials. Most of those hazardous materials
5 are sold to the public in the ordinary course of business. However, at all times relevant hereto
6 and continuing from and after the date of filing of this Complaint, hazardous materials handled
7 by Defendants at the California Facilities were and are rendered unsalable and unusable for their
8 intended purpose as the result of spillage, breakage, expiration of sell-by dates, contamination,
9 damage to containers or labeling, and other causes, and must be handled and disposed of as
10 hazardous waste in compliance with the HWCL.

11 34. At all times relevant to this Complaint, Defendants, and each of them, are and
12 were responsible for the operation of the California Facilities. At all times relevant to this
13 Complaint, Defendants, and each of them, were aware of, established, implemented, managed,
14 directed, approved, ratified and/or controlled the hazardous materials, medical waste, and
15 hazardous waste management activities, policies and procedures at each of the California
16 Facilities. At all times relevant to this Complaint, Defendants' actions and/or omissions, as part
17 of a continuing course of conduct, are or were the legal cause of the violations alleged herein,
18 and Defendants, and each of them, reasonably could have taken action to prevent violations and
19 comply with applicable laws and regulations.

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

23 36. Plaintiff is informed and believes and thereupon alleges that Defendants, and
24 each of them, have violated provisions of the following statutes, including implementing
25 regulations associated with each of the statutes and any related permit, rule, standard, or
26 requirement issued or promulgated pursuant to these statutes, at the California Facilities within
27 the time period applicable to this action: Chapter 6.5 of the Health and Safety Code, sections
28 25100, *et seq.*; Chapter 6.95 of the Health and Safety Code, sections 25500, *et seq.*; Health and

1 Safety Code sections 117600, *et seq.*; Business and Professions Code sections 17200, *et seq.*;
2 and in addition, to the period of time tolled pursuant to the tolling agreements referenced in
3 paragraph 16.

4 37. Plaintiff alleges that Defendants, and each of them, at all times relevant hereto,
5 including the period of time spanned by the series of Tolling Agreements, and continuing from
6 and after the date of filing of this Complaint, caused and/or performed each of the acts and/or
7 omissions in violation of California law in the ownership and/or operation of the California
8 Facilities as alleged below:

- 9 a. Disposed of, or caused the disposal of, hazardous waste at a point not authorized,
10 in violation of Health and Safety Code sections 25189 and 25189.2, including in
11 drains at California Facilities, onto the surface or subsurface of the ground at
12 unauthorized locations, and at landfills not authorized to accept
13 commercial/retail hazardous waste and other locations not authorized to receive
14 hazardous waste;
- 15 b. Transported hazardous waste to unauthorized locations, including, without
16 limitation, Dollar Tree's distribution centers and reverse logistics vendors, in
17 violation of California Code of Regulations, title 22, section 66263.23;
- 18 c. Transported hazardous waste at, to, from, and between California Facilities on
19 vehicles that did not hold a valid registration issued by DTSC, in violation of
20 Health and Safety Code section 25163;
- 21 d. Knowingly caused to be deposited, without the permission of the owner,
22 hazardous substances upon the land of another, in violation of Penal Code
23 section 374.8, subdivision (b);
- 24 e. Failed to determine if a generated waste including, but not limited to, items
25 returned by customers to California Facilities, and wastes generated at California
26 Facilities via spills, container breakage, and other means, were hazardous wastes,
27 as required by Title 22 of the California Code of Regulations section 66262.11,
28 and, where such waste was hazardous, failed to handle the hazardous waste in

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accordance with the requirements of Chapter 6.5 of the Health and Safety Code and its implementing regulations in Title 22 of the California Code of Regulations, including, but not limited to, section 66265.172 (compatible contents), and section 66265.177 (placing incompatible waste streams in the same container);

- f. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of the California Code of Regulations section 66260.200;
- g. Failed to determine if hazardous waste had to be treated before it could be land disposed by testing the waste or using generator knowledge of the waste, in violation of Title 22 of the California Code of Regulations section 66268.7, subdivision (a);
- h. Failed to keep records of any test results, waste analysis, or other determinations made in accordance with section 66262.11 for at least three (3) years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal, in violation of Title 22 of the California Code of Regulations, section 66262.40(c);
- i. Failed to properly manage, identify the accumulation start date, and properly label containers of hazardous waste at California Facilities, in violation of California Code of Regulations, Title 22, section 66262.34;
- j. Failed to properly manage, mark, and store hazardous waste aerosol cans, in violation of section 25201.16 of the California Health and Safety Code;
- k. Failed to use and/or maintain containers holding hazardous waste at the California Facilities so as to prevent leaks, in violation of Title 22 of the California Code of Regulations section 66265.173 and Code of Federal Regulations section 265.171;
- l. Failed to keep containers of hazardous waste closed and/or sealed, except when removing or adding hazardous waste, in violation of Title 22 of the California Code of Regulations section 66265.173;

- 1 m. Failed to comply with employee training obligations pertaining to handling of
2 hazardous waste at California Facilities, in violation of California Code of
3 Regulations, Title 22, section 66265.16.
- 4 n. Failed to obtain and keep current all required hazardous waste generator permits
5 required by county and local ordinances;
- 6 o. Treated, stored, disposed of, transported, and offered for transportation,
7 hazardous waste without having received and used a proper identification
8 number from the U.S. Environmental Protection Agency or DTSC for the
9 originating facility, in violation of Title 22 of the California Code of Regulations
10 section 66262.12, subdivision (a);
- 11 p. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous
12 waste facilities permit, in violation of Health and Safety Code section 25201(a)
13 and Title 22 of the California Code of Regulations section 66270.1;
- 14 q. Stored hazardous waste onsite beyond the time permitted by law at a facility
15 which did not have a hazardous waste storage permit from DTSC, in violation of
16 Title 22 of the California Code of Regulations section 66262.34, and California
17 Health and Safety Code section 25123.3, subdivision (h);
- 18 r. Failed to retain copies of all required hazardous waste manifests for three (3)
19 years, in violation of Health and Safety Code sections 25160, subdivisions (a)
20 and (b), 25160.2, subdivision (b)(3), and Title 22 of the California Code of
21 Regulations section 66262.40, subdivision (a). As used in this paragraph,
22 “manifest” means a shipping document originated and signed by a generator of
23 hazardous waste that contains all of the information required by law and that
24 complies with all applicable federal and state regulations, and includes, but is not
25 limited to, receipts;
- 26 s. Failed to submit to DTSC a legible copy of each manifest used within thirty (30)
27 days of each shipment of hazardous waste off-site or into California, in violation
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of Title 22 of the California Code of Regulations section 66262.23, subdivision (a)(4);

t. Failed to contact the transporter and/or the owner or operator of the designated facility which was to receive the hazardous waste to determine the status of the hazardous waste after the generator did not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within thirty-five (35) days of the date the waste was accepted by the initial transporter, in violation of Title 22 of the California Code of Regulations section 66262.42;

u. Failed to submit an exception report to DTSC after the generator did not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility which was to receive the hazardous waste within forty-five (45) days of the date the waste was accepted by the initial transporter, in violation of Title 22 of the California Code of Regulations section 66262.42, subdivision (b) and Health and Safety Code section 25123.3(h)(2);

v. Failed to comply with the requirements of Title 40 of the Code of Federal Regulations, section 262.34, subdivisions (d) – (f), requiring generators to designate an employee at all times as the emergency coordinator and post the required information listed on Section 262.34, subdivision (d)(5)(i) - (iv), in violation of Title 22 of the California Code of Regulations section 66262.34, subdivision (d)(2);

w. Failed to keep a copy of each manifest signed in accordance with Title 22 of the California Code of Regulations section 66262.23, subdivision (a), for three (3) years or until the generator received a signed copy from the designated facility which received the hazardous waste, in violation of Title 22 of the California Code of Regulations section 66262.40, subdivision (a);

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- 1 x. Failed to properly manage, mark, and store universal waste, in violation of Title
2 22 of the California Code of Regulations sections 66273.13 - 66273.16 and
3 sections 66273.33 – 66273.36;
- 4 y. Failed to keep a record with the information required by section 66273.39,
5 subdivisions (a)(1) – (3), of each shipment of universal waste received at the
6 universal waste handler’s facility, in violation of Title 22 of the California Code
7 of Regulations section 66273.39;
- 8 z. Failed to prepare and maintain hazardous waste manifests, in violation of
9 California Code of Regulations, Title 22, sections 66260, *et seq.*;
- 10 aa. Failed to treat returned or discarded non-empty aerosol cans at California
11 Facilities as universal waste or hazardous waste, in violation of California Code
12 of Regulations, Title 22, Chapter 23, sections 66273.1, *et seq.*;
- 13 bb. Failed to label containers of hazardous waste before transporting hazardous
14 waste from California Facilities, in violation of California Code of Regulations,
15 Title 22, section 66262.31;
- 16 cc. Failed to implement, maintain and comply with an employee training program
17 meeting the requirements of Health and Safety Code section 25505, subdivision
18 (a), and Title 19 of the California Code of Regulations section 2732, pertaining
19 to hazardous materials, and business and area plans;
- 20 dd. Failed to implement and maintain a business emergency plan for emergency
21 response to a release or threatened release of hazardous materials, in violation of
22 Health and Safety Code section 25507;
- 23 ee. Failed to implement, maintain or to submit to the administering agency (as
24 defined in Health and Safety Code sections 25501 and 25502), a complete
25 hazardous materials business plan for each California Facility, in violation of
26 Health and Safety Code sections 25505 and 25508, and section 2729 of Title 19
27 of the California Code of Regulations;

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1 ff. Failed to comply with the California MWMA, Health and Safety Code sections
2 117600, *et seq.*, by failing to have a Medical Waste Management Plan, failing to
3 retain on file disposal receipts and tracking documents for waste shipped offsite
4 for three (3) years, and improperly storing, transporting, and disposing of
5 pharmaceutical wastes;

6 gg. Allowed hazardous waste to remain, after causing its deposit, at a point not
7 authorized, without immediately filing a report of the deposit with the DTSC and
8 complying with any order by the DTSC, in violation of Health & Safety Code
9 sections 25189 subdivision (d) and 25189.2 subdivision (c).

10 hh. Disposed of or caused the disposal of hazardous waste at an unauthorized point
11 in violation of Health & Safety Code section 25189.5, subdivision (a).

12 38. Defendants' noncompliance with the above statutes and regulations threatened
13 public health and safety and/or the environment.

14 **FIRST CAUSE OF ACTION**

15 (Disposal of Hazardous Waste at a Point not Authorized)
16 (Health & Safety Code § 25189 subdivision (c))

17 39. Plaintiff realleges paragraphs 1 through 38, inclusive.

18 40. Health and Safety Code sections 25189 and 25189.2 prohibits the disposal, or
19 causing of the disposal, of hazardous waste at a point not authorized under Chapter 6.5. Section
20 25189(c) prohibits intentional and negligent disposal of hazardous waste at an unauthorized
21 point, and 25189.2, subdivision (c) prohibits the disposal of hazardous waste at an unauthorized
22 point as a matter of strict liability.

23 41. Defendants, and each of them, have disposed of and/or caused the disposal of
24 hazardous waste originating from the California Facilities at unauthorized points, in violation of
25 California Health and Safety Code section 25189 and 25189.2.

26 42. Each disposal of hazardous waste at an unauthorized point discovered within five
27 (5) years of commencing this action, in addition to any applicable tolling periods and those set
28 forth in paragraph 16 herein, and each day the waste was allowed to remain at such point
without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a

1 separate and additional civil penalty under Health and Safety Code section 25189 or
2 alternatively under section 25189.2.

3 43. Based on the above, the People request injunctive relief against Defendants
4 under Health and Safety Code section 25181, and civil penalties under Health and Safety Code
5 sections 25189 or 25189.2, as described in the People's prayer for relief.

6 **SECOND CAUSE OF ACTION**

7 (Unauthorized Transportation of Hazardous Waste)
8 (Health & Safety Code, §§ 25163, 25189 and 25189.2; Cal. Code Regs., Title 22, § 66263.23)

8 44. Plaintiff realleges paragraphs 1 through 43, inclusive.

9 45. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized
10 transportation, or causing the transportation, of hazardous waste. Section 25163 prohibits the
11 transportation of hazardous waste without a valid registration from DTSC. California Code of
12 Regulations, Title 22, section 66263.23, subdivision (b) prohibits the transportation of
13 hazardous waste to a location not permitted or otherwise authorized by the DTSC to receive the
14 waste.

15 46. Defendants, and each of them, have engaged in the transportation, or causing the
16 transportation, of hazardous waste itself, or by a waste hauler, without a valid registration from
17 the DTSC, from the California Facilities to unauthorized locations, in violation of Health and
18 Safety Code section 25163 and California Code of Regulations, Title 22, section 66263.23.

19 47. Each act of unauthorized transportation that the People discovered within five (5)
20 years of commencing this action, in addition to any applicable tolling periods and those set forth
21 in paragraph 16 herein, and each day the waste was allowed to remain at such point without the
22 immediate filing of a report of the deposit with the DTSC, subjects Defendants to a separate and
23 additional civil penalty under Health and Safety Code section 25189 or alternatively 25189.2.

24 48. Based on the above, the People request injunctive relief against Defendants
25 under Health and Safety Code section 25181, and civil penalties under Health and Safety Code
26 section 25189, subdivision (b), as described in the People's prayer for relief.

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their violations of Health and Safety Code section 25189(c) or (b), or alternatively section 25189.2(c);

6. That the Defendants herein be assessed a civil penalty of TWO THOUSAND DOLLARS (\$2,000.00), for each violation, in an amount according to proof, for their violations of Health and Safety Code sections 25515 and 25515.5;

7. That the Defendants herein be assessed a civil penalty of TEN THOUSAND DOLLARS (\$10,000.00), for each violation, in an amount according to proof, for their violations of Health and Safety Code section 118345, subdivision (b);

8. That the Defendants herein be assessed a civil penalty of TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00), for each violation, in an amount according to proof, for their violations of Business and Professions Code section 17206;

9. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit herein; and

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

Dated: April 1, 2015

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

By: 
ALYCE SANDBACH
Deputy District Attorney

Additional Counsel for the Plaintiff

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Exhibit A - California Dollar Tree Facilities

	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
1	5672	2317 BLANDING AVE	ALAMEDA	ALAMEDA	94501-7064	10/1/2014
2	3454	2440 SHATTUCK AVE	BERKELEY	ALAMEDA	94704-2023	10/21/2006
3	4885	1284 SAN PABLO AVENUE	BERKELEY	ALAMEDA	94706-2218	6/28/2012
4	3014	7775 AMADOR VALLEY BLVD.	DUBLIN	ALAMEDA	94568-2303	4/21/2006
5	1846	4949 STEVENSON BLVD, STE. G	FREMONT	ALAMEDA	94538-2572	2/9/2011
6	1846*	4949 STEVENSON BLVD, UNIT P	FREMONT	ALAMEDA	94538-2572	2/26/2001
7	1264	20800 HESPERIAN BLVD.	HAYWARD	ALAMEDA	94541-5805	5/30/1998
8	4118	31047 MISSION BLVD	HAYWARD	ALAMEDA	94544-7601	7/29/2009
9	5130	22487 FOOTHILL BLVD.	HAYWARD	ALAMEDA	94541-4024	5/23/2013
10	1250	1490 RAILROAD AVE.	LIVERMORE	ALAMEDA	94550-3017	11/11/1996
11	4492	35233 NEWARK BLVD, STE C	NEWARK	ALAMEDA	94560-1231	10/22/2010
12	1259	2445 INTERNATIONAL BLVD.	OAKLAND	ALAMEDA	94601-1020	10/31/1997
13	5128	4226 ROSEWOOD DR	PLEASANTON	ALAMEDA	94588-3000	1/11/2013
14	1387	15100 HESPERIAN BLVD., SUITE 114	SAN LEANDRO	ALAMEDA	94578-3600	2/18/2000
15	2515	14801 WASHINGTON AVE	SAN LEANDRO	ALAMEDA	94578-4221	6/29/2003
16	5364	1933 DAVIS STREET	SAN LEANDRO	ALAMEDA	94577-1256	11/15/2013
17	1233	1720 DECOTO RD.	UNION CITY	ALAMEDA	94587-3524	12/10/1994
18	1735	11986 STATE HWY 88, SUITE 2060	JACKSON	AMADOR	95642-9472	8/5/2000
19	1227	801 EAST AVE, SUITE 129	CHICO	BUTTE	95926-1250	9/15/2007
20	1265	2485 NOTRE DAME BV #480	CHICO	BUTTE	95928-7164	6/14/2014
21	2207	1560 STATE HIGHWAY 99	GRIDLEY	BUTTE	95948-3121	11/13/2002
22	1219	1911 ORO DAM BLVD EAST	OROVILLE	BUTTE	95966-5912	1/15/2002
23	2140	6626 CLARK RD	PARADISE	BUTTE	95969-3547	4/2/2011
24	1740	2710 DELTA FAIR BLVD	ANTIOCH	CONTRA COSTA	94509-4100	10/15/2000
25	4406	3305 DEER VALLEY RD.	ANTIOCH	CONTRA COSTA	94531-6664	8/17/2010
26	3494	51 W SAND CREEK RD	BRENTWOOD	CONTRA COSTA	94513-2025	10/28/2006
27	1536	5434 YGNACIO VALLEY ROAD, SUITE 200	CONCORD	CONTRA COSTA	94521-3840	3/28/2000
28	5355	1825 SALVIO STREET	CONCORD	CONTRA COSTA	94520-2572	10/13/2013
29	2824*	3517 CLAYTON RD	CONCORD	CONTRA COSTA	94519	6/10/2004
30	3058	11555 SAN PABLO AVE.	EL CERRITO	CONTRA COSTA	94530-1951	7/5/2005
31	4785	1047 ARNOLD DR	MARTINEZ	CONTRA COSTA	94553	8/25/2012
32	4472	542 CENTER ST.	MORAGA	CONTRA COSTA	94556-2207	6/5/2011
33	3178	1598 FITZGERALD DR.	PINOLE	CONTRA COSTA	94564-2229	9/29/2005
34	1556	2951 RAILROAD AVE	PITTSBURG	CONTRA COSTA	94565-5224	6/30/2000
35	4369	690 BAILEY RD	PITTSBURG	CONTRA COSTA	94565-4306	8/18/2010
36	1226	2318 MONUMENT BLVD.	PLEASANT HILL	CONTRA COSTA	94523-3950	6/30/1993
37	1214	2415 SAN PABLO DAM RD, STE 250	SAN PABLO	CONTRA COSTA	94806-3921	10/19/1994
38	1990	921 NORTHCREST DR	CRESCENT CITY	DEL NORTE	95531-2329	7/16/2010
39	1990*	1180 9TH STREET	CRESCENT CITY	DEL NORTE	95531-2810	6/30/2001
40	4242	3386 COACH LANE	CAMERON PARK	EL DORADO	95682-8454	9/19/2009
41	1244	1480 BROADWAY	PLACERVILLE	EL DORADO	95667-5904	6/14/1996
42	1234	50 WEST SHAW AVENUE	CLOVIS	FRESNO	93612-3723	7/28/1995
43	1358	930 HERNDON AVENUE	CLOVIS	FRESNO	93612-0408	9/7/1999
44	5404	625 W HERNDON AVE	CLOVIS	FRESNO	93612-0368	11/2/2013
45	4395	201 W POLK ST.	COALINGA	FRESNO	93210-2303	8/8/2010
46	1217	4982 E KINGS CANYON RD.	FRESNO	FRESNO	93727-3896	9/18/1997
47	1231	4474 WEST SHAW AVE	FRESNO	FRESNO	93710-6210	5/28/2005
48	1232	5265 NORTH BLACKSTONE AVE	FRESNO	FRESNO	93710-6703	6/9/1999
49	1239	5666 E KINGS CANYON RD	FRESNO	FRESNO	93727-4627	3/15/2002
50	1241	3300 EAST TULARE AVE	FRESNO	FRESNO	93702-2727	4/20/1996
51	1261	4021 EAST ASHLAN AVENUE	FRESNO	FRESNO	93726-3734	4/13/1998
52	1730	6728 NORTH CEDAR AVENUE	FRESNO	FRESNO	93710-4403	7/31/2000
53	1964	3730 NORTH BLACKSTONE AVE	FRESNO	FRESNO	93726-5306	6/29/2001
54	2093	3780 W SHIELDS AVE	FRESNO	FRESNO	93722-6702	2/17/2004
55	2600	917 E. OLIVE AVENUE	FRESNO	FRESNO	93728-3417	2/1/2004
56	3676	1544 E. CHAMPLAIN DR, SUITE 105	FRESNO	FRESNO	93720-5627	7/5/2007
57	2955	15156 W WHITESBRIDGE AVE	KERMAN	FRESNO	93630-1019	10/30/2004
58	2811	967 WEST MANNING AVE	REEDLEY	FRESNO	93654-2446	8/27/2005
59	4299	2656 JENSEN AVE	SANGER	FRESNO	93657-9777	1/31/2010
60	1517	3380 FLORAL AVE	SELMA	FRESNO	93662-9040	8/14/2000
61	5361	1028 SOUTH STREET	ORLAND	GLENN	95963-1672	10/15/2013

Exhibit A - California Dollar Tree Facilities

	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
62	5496	460 N HUMBOLT AVE.	WILLOWS	GLENN	95988-2612	5/1/2014
63	1845	5000 VALLEY W BLVD, SPACE 10	ARCATA	HUMBOLDT	95521-4646	3/25/2001
64	1945	1111 MYRTLE AVE., SUITE 5	EUREKA	HUMBOLDT	95501-4000	10/25/2001
65	3770	800 W HARRIS ST, SUITE 5	EUREKA	HUMBOLDT	95503-3929	9/20/2007
66	1561*	3300 BROADWAY STE 804	EUREKA	HUMBOLDT	95501	5/2/2000
67	1878*	727 S. FORTUNA BLVD	FORTUNA	HUMBOLDT	95540-3034	4/26/2001
68	1878*	721 S. FORTUNA BLVD	FORTUNA	HUMBOLDT	95540-3040	7/17/2014
69	3061	283 MAIN ST., #C	BRAWLEY	IMPERIAL	92227-2350	6/12/2005
70	2850	2340 N. IMPERIAL AVE #1	CALEXICO	IMPERIAL	92231-2340	9/12/2004
71	3748	2300 N COTTONWOOD DR	EL CENTRO	IMPERIAL	92243-1600	11/2/2007
72	3752	3509 SOUTH DOGWOOD RD	EL CENTRO	IMPERIAL	92243-4605	2/3/2008
73	3870	904 BEAR MOUNTAIN BLVD	ARVIN	KERN	93203-1302	3/6/2009
74	1247	4456 MING AVENUE	BAKERSFIELD	KERN	93309-4800	9/21/1996
75	1255	731 AIRPORT DRIVE	BAKERSFIELD	KERN	93308-4129	7/25/1997
76	1262	2505 SOUTH H STREET	BAKERSFIELD	KERN	93304-5605	5/8/1998
77	1267	6151 NILES STREET	BAKERSFIELD	KERN	93306-4689	10/28/1998
78	2121	7890 WHITE LANE	BAKERSFIELD	KERN	93309-7670	2/28/2002
79	2287	1721 GOLDEN STATE AVENUE	BAKERSFIELD	KERN	93301-1009	9/30/2002
80	2759	2717 CALLOWAY DRIVE	BAKERSFIELD	KERN	93312-2618	3/1/2004
81	2964	5430 STOCKDALE HIGHWAY	BAKERSFIELD	KERN	93309-2502	11/24/2004
82	5793	1505 COLUMBUS ST	BAKERSFIELD	KERN	93305-2132	2/28/2015
83	5814	4725 PANAMA LANE, UNIT D6	BAKERSFIELD	KERN	93313-3408	1/15/2015
84	1484	625 CECIL AVE	DELANO	KERN	93215-2023	2/3/2000
85	5627	720 WOOLLOMES AVE.	DELANO	KERN	93215-9552	7/18/2014
86	2958	10212 MAIN STREET	LAMONT	KERN	93241-1705	10/30/2004
87	2177	100 NORTH CHINA LAKE BLV	RIDGECREST	KERN	93555-3916	6/30/2002
88	3774	305 GARDNER FIELD RD	TAFT	KERN	93268-9726	7/22/2008
89	2430	844 TUCKER ROAD	TEHACHAPI	KERN	93561-2530	4/30/2004
90	3296	2701 HIGHWAY 46	WASCO	KERN	93280-2912	2/4/2007
91	1246	1818 WEST LACEY BLVD.	HANFORD	KINGS	93230-7382	8/16/1996
92	2195	95 W. HANFORD ARMONA RD.	LEMOORE	KINGS	93245-2319	5/7/2003
93	4447	14804 OLYMPIC DR	CLEARLAKE	LAKE	95422-9521	8/12/2010
94	1242	1305 SOUTH MAIN ST.	LAKEPORT	LAKE	95453-5520	5/4/1996
95	1392	2545 MAIN STREET	SUSANVILLE	LASSEN	96130-4709	5/30/2009
96	1882	820 EAST VALLEY BLVD.	ALHAMBRA	LOS ANGELES	91801-5225	5/28/2001
97	4252	131 E FOOTHILL BLVD.	ARCADIA	LOS ANGELES	91006-2506	3/27/2010
98	4575	11837 ARTESIA BLVD	ARTESIA	LOS ANGELES	90701-4002	4/16/2011
99	4304	1642 PUENTE AVE.	BALDWIN PARK	LOS ANGELES	91706-5952	2/5/2010
100	4568	4259 MAINE AVE	BALDWIN PARK	LOS ANGELES	91706-3312	2/26/2011
101	4023	6207 ATLANTIC AVE	BELL	LOS ANGELES	90201-1225	11/21/2008
102	3977	6810 EASTERN AVE, STE F	BELL GARDENS	LOS ANGELES	90201-3928	10/13/2008
103	5780	10237 ROSECRANS BLVD.	BELLFLOWER	LOS ANGELES	90706-2601	1/5/2015
104	3826	20936 ROSCOE BLVD.	CANOGA PARK	LOS ANGELES	91304-4308	2/27/2008
105	5475	170 E. CARSON STREET	CARSON	LOS ANGELES	90745-2702	11/15/2014
106	4290	31876 CASTAIC RD.	CASTAIC	LOS ANGELES	91384-3943	2/8/2010
107	4814	11855 DEL AMO BLVD	CERRITOS	LOS ANGELES	90703-7605	4/4/2012
108	4886	17504 CARMENITA AVENUE.	CERRITOS	LOS ANGELES	90703-8635	8/17/2014
109	4956	1210 N. LONG BEACH BLVD	COMPTON	LOS ANGELES	90221-1600	8/4/2012
110	5484	1789 S. ALAMEDA STREET	COMPTON	LOS ANGELES	90220-4977	5/3/2014
111	1918	410 N. AZUSA AVE.	COVINA	LOS ANGELES	91722-3610	8/26/2006
112	4946	1045 N GRAND AVE	COVINA	LOS ANGELES	91724-2048	2/7/2013
113	4187	11455 JEFFERSON BLVD	CULVER CITY	LOS ANGELES	90230-6105	6/18/2009
114	4312	8330 FIRESTONE BLVD	DOWNEY	LOS ANGELES	90241-3842	5/8/2010
115	5758	10227 LAKEWOOD BLVD	DOWNEY	LOS ANGELES	90241-2741	10/4/2014
116	1747	1207 HUNTINGTON DRIVE	DUARTE	LOS ANGELES	91010-2485	10/15/2000
117	2017	11910 VALLEY BLVD	EL MONTE	LOS ANGELES	91732	10/31/2001
118	4846	14700 CRENSHAW BLVD.	GARDENA	LOS ANGELES	90249-3602	2/10/2012
119	5460	1310 W ROSECRANS AVE.	GARDENA	LOS ANGELES	90247-2420	4/5/2014
120	5695	13039 HAWTHORNE BLVD	HAWTHORNE	LOS ANGELES	90250-4415	10/4/2014
121	4584	5817 N FIGUEROA ST	HIGHLAND PARK	LOS ANGELES	90042-4227	4/4/2011
122	3763	7610 S ALAMEDA STREET	HUNTINGTON PARK	LOS ANGELES	90255-3744	4/5/2008
123	5379	2525 E GAGE AVE.	HUNTINGTON PARK	LOS ANGELES	90255-4017	3/1/2014

Exhibit A - California Dollar Tree Facilities

	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
124	4860	4747 W. CENTURY BLVD	INGLEWOOD	LOS ANGELES	90304-1441	5/25/2012
125	4896	11278 CRENSHAW BLVD.	INGLEWOOD	LOS ANGELES	90303-2805	3/20/2012
126	4995	811 N LA BREA AVE	INGLEWOOD	LOS ANGELES	90302-3641	3/18/2013
127	5426	13936 IMPERIAL HIGHWAY	LA MIRADA	LOS ANGELES	90638-1725	11/1/2013
128	4621	1381 N HACIENDA BLVD.	LA PUENTE	LOS ANGELES	91744-1611	4/23/2011
129	5257	1475 FOOTHILL BLVD	LA VERNE	LOS ANGELES	91750-3451	9/24/2013
130	4273	5825 BELLFLOWER BLVD	LAKEWOOD	LOS ANGELES	90713-1057	3/25/2010
131	1540	1061 E AVENUE J	LANCASTER	LOS ANGELES	93535-3849	2/24/2005
132	4509	1101 W AVENUE I, STE 105	LANCASTER	LOS ANGELES	93534-2245	2/22/2011
133	5445	2041 W. AVENUE K	LANCASTER	LOS ANGELES	93536-5217	4/3/2014
134	5298	4181 REDONDO BEACH BLVD.	LAWNDALE	LOS ANGELES	90260-3340	5/3/2014
135	3885	6426 E. SPRING ST.	LONG BEACH	LOS ANGELES	90815-1553	5/3/2008
136	4129	8111 E WARDLOW ROAD	LONG BEACH	LOS ANGELES	90808-3204	4/23/2009
137	4671	1480 ALAMITOS AVE	LONG BEACH	LOS ANGELES	90813-2213	7/1/2011
138	4095	426 S ALVARADO ST.	LOS ANGELES	LOS ANGELES	90057-2902	7/30/2009
139	4201	4953 WHITTIER BLVD.	LOS ANGELES	LOS ANGELES	90022-3114	3/13/2010
140	4711	5710 CRENSHAW BOULEVARD	LOS ANGELES	LOS ANGELES	90043-2410	9/2/2011
141	4949	2850 E. OLYMPIC BLVD	LOS ANGELES	LOS ANGELES	90023-3412	6/15/2012
142	4993	3148 W PICO BLVD.	LOS ANGELES	LOS ANGELES	90019-4711	7/21/2014
143	5013	3710 S. LA BREA AVENUE, UNIT A	LOS ANGELES	LOS ANGELES	90016-5310	10/27/2012
144	5441	1007 CYPRESS AVE	LOS ANGELES	LOS ANGELES	90065-1136	11/16/2013
145	5489	2700 N. BROADWAY.	LOS ANGELES	LOS ANGELES	90031-2610	2/21/2014
146	5490	4617 HUNTINGTON DR. N	LOS ANGELES	LOS ANGELES	90032-1919	4/11/2014
147	5542	2035 -2055 VENICE BLVD.	LOS ANGELES	LOS ANGELES	90006-5222	11/15/2014
148	5595	5057 W WASHINGTON BLVD	LOS ANGELES	LOS ANGELES	90016-1450	1/17/2015
149	5810	4300 SOUTH CENTRAL AVE	LOS ANGELES	LOS ANGELES	90049	11/15/2014
150	4556	4160 LINCOLN BLVD.	MARINA DEL REY	LOS ANGELES	90292-5616	2/20/2011
151	1040	828 BEVERLY BOULEVARD	MONTEBELLO	LOS ANGELES	90640-4213	6/30/2000
152	3255	2305 S GARFIELD AVENUE	MONTEREY PARK	LOS ANGELES	91754-7219	1/29/2006
153	4775	720 S ATLANTIC BLVD.	MONTEREY PARK	LOS ANGELES	91754-3859	10/29/2011
154	3907	12809 SHERMAN WAY	N HOLLYWOOD	LOS ANGELES	91605-5034	4/18/2008
155	4959	23788 NEWHALL AVENUE	NEWHALL	LOS ANGELES	91321-3125	10/13/2012
156	4517	6120 LANKERSHIM BLVD.	NORTH HOLLYWOOD	LOS ANGELES	91606-4808	11/15/2010
157	4989	9040 TAMPA AVE.	NORTHRIDGE	LOS ANGELES	91324-3523	9/5/2012
158	5195	8254 WHITE OAK AVE, UNIT 1	NORTHRIDGE	LOS ANGELES	91325-4300	9/11/2013
159	2993	13913 PIONEER BLVD.	NORWALK	LOS ANGELES	90650-3921	2/26/2005
160	1535	222 EAST PALMDALE BLVD	PALMDALE	LOS ANGELES	93550-4515	7/17/2000
161	4235	4616 EAST AVENUE S	PALMDALE	LOS ANGELES	93552-4418	1/31/2010
162	3004	8418-VAN NUYS BLVD.	PANORAMA CITY	LOS ANGELES	91402-3610	4/1/2005
163	5302	181 S ROSEMEAD BLVD	PASADENA	LOS ANGELES	91107-3955	7/4/2013
164	4358	8790 WASHINGTON BLVD.	PICO RIVERA	LOS ANGELES	90660-3793	5/1/2010
165	5866	9425 TELEGRAPH ROAD, SUITE 116	PICO RIVERA	LOS ANGELES	90660-5553	2/10/2015
166	5392	305 E FOOTHILL BOULEVARD	POMONA	LOS ANGELES	91767-1405	1/20/2014
167	3076	1206 BERYL STREET	REDONDO BEACH	LOS ANGELES	90277-2427	5/6/2005
168	5187	2218 ARTESIA BLVD	REDONDO BEACH	LOS ANGELES	90278-3112	6/14/2013
169	1084	19337 VICTORY BOULEVARD	RESEDA	LOS ANGELES	91335-6302	9/17/2000
170	2951*	18225 SHERMAN WAY	RESEDA	LOS ANGELES	91335	10/30/2004
171	4362	3566 ROSEMEAD BLVD	ROSEMEAD	LOS ANGELES	91770-2053	7/31/2010
172	1968	17440 COLIMA ROAD	ROWLAND HEIGHTS	LOS ANGELES	91748-1632	6/30/2001
173	2883	156 E BONITA AVENUE, SUITE C-3	SAN DIMAS	LOS ANGELES	91773-3080	11/5/2004
174	2976	900 SAN FERNANDO RD.	SAN FERNANDO	LOS ANGELES	91340-3311	11/1/2004
175	4858	1505 SOUTH PACIFIC AVENUE	SAN PEDRO	LOS ANGELES	90731-4887	5/26/2012
176	5596	1505 SOUTH PACIFIC AVENUE	SAN PEDRO	LOS ANGELES	90731-4887	11/15/2014
177	1783	19339 SOLEDAD CANYON RD	SANTA CLARITA	LOS ANGELES	91351-2630	10/28/2000
178	4313	3075 CALIFORNIA AVE	SIGNAL HILL	LOS ANGELES	90755-5101	1/31/2010
179	4445	3638 TWEEDY BLVD.	SOUTH GATE	LOS ANGELES	90280-6044	11/23/2010
180	5689	8914 GLENOAKS BLVD	SUN VALLEY	LOS ANGELES	91352-2037	10/23/2014
181	2966	855 SEPULVEDA BLVD	TORRANCE	LOS ANGELES	90502-3003	11/24/2004
182	3791	1431 W. KNOX ST STE 400	TORRANCE	LOS ANGELES	90501-1360	3/6/2008
183	4644	23126 HAWTHORNE BLVD	TORRANCE	LOS ANGELES	90505-3705	6/30/2011
184	5132	22217 PALOS VERDES BLVD, STE 2	TORRANCE	LOS ANGELES	90505-2016	3/3/2013

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	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
185	4243	6540 FOOTHILL BLVD., UNIT 109 & 110	TUJUNGA	LOS ANGELES	91042-2764	9/13/2009
186	4042	23152 VALENCIA BLVD.	VALENCIA	LOS ANGELES	91355-1716	12/11/2008
187	4668	12144 MAGNOLIA BLVD.	VALLEY VILLAGE	LOS ANGELES	91607-2620	6/25/2011
188	5294	6108 N. SEPULVEDA BLVD.	VAN NUYS	LOS ANGELES	91411-2503	8/31/2013
189	2971*	6711 VAN NUYS BLVD	VAN NUYS	LOS ANGELES	91405-4620	11/1/2004
190	3707	20655 AMAR RD.	WALNUT	LOS ANGELES	91789-5037	8/1/2007
191	3186	501 S VINCENT AVE	WEST COVINA	LOS ANGELES	91790-6712	7/18/2006
192	4712	2851 E EASTLAND CENTER DR, STE 11	WEST COVINA	LOS ANGELES	91791-1671	9/22/2011
193	1973	6454 PLATT AVENUE	WEST HILLS	LOS ANGELES	91307-3216	8/7/2001
194	2956	8514 PAINTER AVENUE #J	WHITTIER	LOS ANGELES	90602-3335	10/30/2004
195	5087	11217 WHITTIER BLVD	WHITTIER	LOS ANGELES	90606-1433	4/19/2013
196	5299	1119 W PACIFIC COAST HWY	WILMINGTON	LOS ANGELES	90744-2425	10/17/2014
197	1220	2140 WEST CLEVELAND AVE, STE 116	MADERA	MADERA	93637-8757	11/6/2008
198	1220*	2121 WEST CLEVELAND AVE	MADERA	MADERA	93637-8721	8/25/1992
199	4566	40015 HIGHWAY 49, STE 301	OAKHURST	MADERA	93644-8804	7/1/2011
200	3480	455 ENTRADA RD	NOVATO	MARIN	94949-5518	7/20/2007
201	4393	928 DIABLO AVE	NOVATO	MARIN	94947-4025	7/1/2010
202	4724	825 FRANCISCO BLVD W	SAN RAFAEL	MARIN	94901-5307	11/23/2011
203	4080	120 DONAHUE ST	SAUSALITO	MARIN	94965-1250	2/1/2009
204	5853	189 BOATYARD DRIVE	FORT BRAGG	MENDOCINO	95437-5741	1/16/2015
205	4060	1395 N STATE ST, STE. A	KOKIAH	MENDOCINO	95482-3476	3/25/2009
206	2939	1710 S MAIN ST.	WILLITS	MENDOCINO	95490-4405	11/19/2004
207	3259	500 EAST BELLEVUE ROAD	ATWATER	MERCED	95301-2339	4/13/2007
208	4770	1261 COMMERCE AVE, STE B	ATWATER	MERCED	95301-5223	9/27/2011
209	1256	1423 W PACHECO BLVD	LOS BANOS	MERCED	93635-7806	10/8/2009
210	1256*	1321 E PACHECO BLVD, STE B	LOS BANOS	MERCED	93635-4335	6/27/1997
211	1222	1115 W MAIN ST	MERCED	MERCED	95340-4522	7/25/2010
212	1222*	1218 WEST OLIVE AVENUE	MERCED	MERCED	95348-1662	5/29/2001
213	5491	239 HUERTA AVE.	GREENFIELD	MONTEREY	93927-5762	3/30/2014
214	2953	520 CANAL STREET, SUITE B	KING CITY	MONTEREY	93930-3446	10/30/2004
215	4202	215 RESERVATION RD, SUITE H	MARINA	MONTEREY	93933-3059	10/30/2009
216	1389	1441 N. MAIN ST	SALINAS	MONTEREY	93906-2403	11/19/1999
217	3632	1553 N. SANBORN RD	SALINAS	MONTEREY	93905-4717	10/2/2007
218	5852	1235 N DAVIS ROAD	SALINAS	MONTEREY	93907-1996	1/30/2015
219	2183	1816 FREMONT BLVD	SEASIDE	MONTEREY	93955-3611	4/27/2002
220	2260	762A FREEMAN LANE	GRASS VALLEY	NEVADA	95949-9622	7/3/2014
221	1924	1811 W LINCOLN AVE	ANAHEIM	ORANGE	92801-6731	6/30/2001
222	4725	1238 S MAGNOLIA AVE.	ANAHEIM	ORANGE	92804-5116	10/28/2011
223	5131	1021 N STATE COLLEGE BLV	ANAHEIM	ORANGE	92806-2774	8/1/2013
224	3262	8321 LA PALMA AVENUE	BUENA PARK	ORANGE	90620-3207	3/14/2006
225	4788	8930 VALLEY VIEW ST	BUENA PARK	ORANGE	90620-3531	10/31/2011
226	5864	7540 ORANGETHORPE AVE, SUITE A3	BUENA PARK	ORANGE	90621-3458	1/30/2015
227	4525	34077 DOHENY PARK RD	CAPISTRANO BEACH	ORANGE	92624-1106	3/8/2011
228	5335	2230 FAIRVIEW ROAD, UNIT D	COSTA MESA	ORANGE	92627-7808	9/20/2013
229	1823	6887 KATELLA AVENUE	CYPRESS	ORANGE	90630-5107	3/28/2001
230	1871	16141 HARBOR BLVD	FOUNTAIN VALLEY	ORANGE	92708-1305	6/28/2001
231	4370	17876 NEWHOPE ST.	FOUNTAIN VALLEY	ORANGE	92708-5431	7/20/2010
232	5010	17930 MAGNOLIA STREET	FOUNTAIN VALLEY	ORANGE	92708-5039	8/4/2012
233	2039	221 ORANGEFAIR MALL	FULLERTON	ORANGE	92832-3038	10/31/2001
234	4437	2465 E CHAPMAN AVE	FULLERTON	ORANGE	92831-3603	8/22/2010
235	2053	9679 CHAPMAN AVENUE	GARDEN GROVE	ORANGE	92841-2706	10/18/2001
236	4678	13171 HARBOR BLVD.	GARDEN GROVE	ORANGE	92843-1717	10/29/2011
237	5053	18595 BEACH BLVD.	HUNTINGTON BEACH	ORANGE	92648-2053	10/27/2012
238	1954	1230 WEST IMPERIAL HWY	LA HABRA	ORANGE	90631-6987	10/15/2001
239	4845	1279 EAST LA HABRA BLVD	LA HABRA	ORANGE	90631-5637	4/26/2012
240	4021	24401 ALICIA PKWY, SUITE D	MISSION VIEJO	ORANGE	92691-4537	11/26/2008
241	5706	23042 ALICIA PARKWAY	MISSION VIEJO	ORANGE	92692-1636	10/4/2014
242	2325	1421 W. CHAPMAN AVE.	ORANGE	ORANGE	92868-2703	6/10/2011
243	4933	784 N TUSTIN ST.	ORANGE	ORANGE	92867-7129	10/18/2012
244	5341	31878 DEL OBISPO ST., SUITE 125	SAN JUAN CAPISTRANO	ORANGE	92675-3253	8/3/2013
245	2981	1900 N GRAND AVENUE #B	SANTA ANA	ORANGE	92705-7038	11/24/2004
246	4530	3309 S BRISTOL ST, STE A	SANTA ANA	ORANGE	92704-7262	10/30/2010

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	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
247	4714	631 S. MAIN ST, STE A	SANTA ANA	ORANGE	92701-5715	9/10/2011
248	5023	13960 SEAL BEACH BLVD	SEAL BEACH	ORANGE	90740-5301	9/8/2012
249	4758	17271 17TH STREET	TUSTIN	ORANGE	92780-1951	11/19/2011
250	2474	6741 WESTMINSTER BLVD	WESTMINSTER	ORANGE	92683-8060	5/3/2003
251	4307	15400 GOLDENWEST ST	WESTMINSTER	ORANGE	92683-6149	4/2/2010
252	1212	2136 GRASS VALLEY HWY	AUBURN	PLACER	95603-2522	2/4/2007
253	4415	6861 DOUGLAS BLVD.	GRANITE BAY	PLACER	95746-6259	9/25/2010
254	5422	53 LINCOLN BLVD.	LINCOLN	PLACER	95648-6313	11/1/2013
255	1848	6005 PACIFIC STREET	ROCKLIN	PLACER	95677-3423	5/26/2001
256	3960	6656 LONETREE BLVD #E	ROCKLIN	PLACER	95765-3735	7/13/2008
257	1248	108 B HARDING BLVD	ROSEVILLE	PLACER	95678-2805	10/18/1996
258	3223	5170 FOOTHILLS BLVD	ROSEVILLE	PLACER	95747-6583	1/29/2006
259	1521	50 EAST MAIN STREET	QUINCY	PLUMAS	95971-9701	9/16/2003
260	4690	3403 W RAMSEY ST., STE A	BANNING	RIVERSIDE	92220-3501	6/25/2011
261	3621	1486 E 2ND STREET	BEAUMONT	RIVERSIDE	92223-3160	8/31/2007
262	3552	661 W HOBSON WAY	BLYTHE	RIVERSIDE	92225-1512	11/8/2006
263	4216	68401 E. PALM CANYON DR.	CATHEDRAL CITY	RIVERSIDE	92234-5461	9/1/2009
264	2216	125 N MCKINLEY STREET	CORONA	RIVERSIDE	92879-6566	6/29/2002
265	2972	1220 MAGNOLIA AVE #101	CORONA	RIVERSIDE	92881-2067	11/1/2004
266	4545	281 S LINCOLN AVE	CORONA	RIVERSIDE	92882-1855	1/30/2011
267	4605	2751 GREEN RIVER RD, STE 101	CORONA	RIVERSIDE	92882-7425	4/21/2011
268	2954	1420 EAST FLORIDA AVENUE	HEMET	RIVERSIDE	92544-8624	10/30/2004
269	4120	1167 S SANDERSON AVE.	HEMET	RIVERSIDE	92545-9047	8/29/2009
270	5279	43372 STATE HWY. 74	HEMET	RIVERSIDE	92544-7200	8/3/2013
271	4121	82025 HWY 111 STE 101	INDIO	RIVERSIDE	92201-5686	4/18/2010
272	4209	42225 JACKSON ST, # A102	INDIO	RIVERSIDE	92203-9303	2/20/2010
273	5594	79700 HIGHWAY 111	LA QUINTA	RIVERSIDE	92253-4538	7/22/2014
274	3898	29229 CENTRAL AVE #C	LAKE ELSINORE	RIVERSIDE	92532-2248	3/7/2008
275	5401	32275 MISSION TRAIL	LAKE ELSINORE	RIVERSIDE	92530-4530	11/2/2013
276	4400	30133 ANTELOPE RD	MENIFEE	RIVERSIDE	92584-8067	7/2/2010
277	5415	26932 CHERRY HILLS BLVD.	MENIFEE	RIVERSIDE	92586-2574	1/13/2014
278	3135	12320 PERRIS BLVD., UNIT B	MORENO VALLEY	RIVERSIDE	92557-7423	10/7/2005
279	4073	12625 FREDERICK ST. D2	MORENO VALLEY	RIVERSIDE	92553-5216	2/1/2009
280	5061	26150 IRIS AVENUE STE 16	MORENO VALLEY	RIVERSIDE	92555-3010	11/12/2012
281	5497	25050 ALESSANDRO BLVD	MORENO VALLEY	RIVERSIDE	92553-4313	4/5/2014
282	2326	40565 CALIFORNIA OAKS RD	MURRIETA	RIVERSIDE	92562-5855	9/30/2002
283	4396	39865 ALTA MURRIETA DR	MURRIETA	RIVERSIDE	92563-5439	7/31/2010
284	4353	2748 HAMNER AVE, STE 107	NORCO	RIVERSIDE	92860-1994	4/30/2010
285	2022	42245 WASHINGTON STREET	PALM DESERT	RIVERSIDE	92211-8023	9/28/2001
286	4620	72630 DINAH SHORE DR., STE 100	PALM DESERT	RIVERSIDE	922110801	5/7/2011
287	3598	1717 E VISTA CHINO, SUITE J	PALM SPRINGS	RIVERSIDE	92262-3569	5/19/2008
288	2980	2560 N PERRIS BLVD.	PERRIS	RIVERSIDE	92571-3249	11/17/2004
289	1803	7790 LIMONITE AVE	RIVERSIDE	RIVERSIDE	92509-5314	6/26/2004
290	2244	4074 & 4076 MADISON ST	RIVERSIDE	RIVERSIDE	92504-2642	9/9/2002
291	2770	4033 CHICAGO AVENUE, #B	RIVERSIDE	RIVERSIDE	92507-5337	6/16/2004
292	2977	3590 TYLER STREET, STE B (105)	RIVERSIDE	RIVERSIDE	92503-4133	2/1/2009
293	5354	4712 LA SIERRA AVENUE	RIVERSIDE	RIVERSIDE	92505-2799	1/26/2014
294	2977*	5612 VAN BUREN	RIVERSIDE	RIVERSIDE	92503-8036	11/1/2004
295	4294	26455 YNEZ RD	TEMECULA	RIVERSIDE	92591-4654	11/9/2009
296	4730	31741 TEMECULA PKWY., SUITE A1	TEMECULA	RIVERSIDE	92592-6800	10/20/2011
297	1209	4005 MANZANITA AVE #32	CARMICHAEL	SACRAMENTO	95608-1783	10/30/2001
298	1202	7313 GREENBACK LANE	CITRUS HEIGHTS	SACRAMENTO	95621-5530	11/19/1990
299	2119	7840 MACY PLAZA DRIVE	CITRUS HEIGHTS	SACRAMENTO	95610-6802	3/25/2002
300	2236	7859 LICHEN DRIVE	CITRUS HEIGHTS	SACRAMENTO	95621-1074	5/30/2002
301	2922	7000 SUNRISE BLVD	CITRUS HEIGHTS	SACRAMENTO	95610-3102	1/30/2005
302	1213	8696 ELK GROVE BLVD., SUITE 11	ELK GROVE	SACRAMENTO	95624-3301	4/20/1999
303	3447	8126 SHELDON ROAD	ELK GROVE	SACRAMENTO	95758-5928	5/5/2007
304	1268	8852 MADISON AVENUE	FAIR OAKS	SACRAMENTO	95628-3908	11/20/1998
305	1228	627 E BIDWELL STREET	FOLSOM	SACRAMENTO	95630-3120	8/15/2007
306	5786	25000 BLUE RAVINE RD..	FOLSOM	SACRAMENTO	95630-5723	10/30/2014
307	2271	10410 TWIN CITIES RD	GALT	SACRAMENTO	95632-9032	1/11/2003

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308	1201	3661 ELKHORN BLVD	NORTH HIGHLANDS	SACRAMENTO	95660-3730	10/27/2003
309	5225	4720 WATT AVE.	NORTH HIGHLANDS	SACRAMENTO	95660-5516	8/11/2013
310	1223*	3222 WINONA WAY	NORTH HIGHLANDS	SACRAMENTO	95660-5523	10/30/1992
311	1205	10337 FOLSOM BOULEVARD	RANCHO CORDOVA	SACRAMENTO	95670-3518	8/6/1992
312	5316	2342 SUNRISE BLVD., STE 31	RANCHO CORDOVA	SACRAMENTO	95670-4372	9/23/2013
313	1203	5051 FRUITRIDGE RD.	SACRAMENTO	SACRAMENTO	95820-5433	7/26/2007
314	1204	6650 VALLEY HI DRIVE	SACRAMENTO	SACRAMENTO	95823-4602	12/1/1994
315	1229	7020 STOCKTON BLVD.	SACRAMENTO	SACRAMENTO	95823-2312	12/1/2006
316	1976	3308 ARDEN WAY	SACRAMENTO	SACRAMENTO	95825-2017	7/31/2001
317	2041	3615 NORTHGATE BLVD	SACRAMENTO	SACRAMENTO	95834-1600	5/31/2002
318	2545	1347 FLORIN ROAD	SACRAMENTO	SACRAMENTO	95831-3618	6/30/2003
319	3566	6710 FOLSOM BLVD.	SACRAMENTO	SACRAMENTO	95819-4626	2/14/2007
320	4481	1235 S STREET	SACRAMENTO	SACRAMENTO	95811-7111	7/15/2011
321	4670	4910 FREEPORT BLVD	SACRAMENTO	SACRAMENTO	95822-2153	11/10/2011
322	4726	1895 HOWE AVE.	SACRAMENTO	SACRAMENTO	95825-1025	9/22/2011
323	5211	2000 CLUB CENTER DRIVE, SUITE 100	SACRAMENTO	SACRAMENTO	95835-1423	8/12/2013
324	5580	2540 WATT AVENUE	SACRAMENTO	SACRAMENTO	95821-6312	5/31/2014
325	2048*	560 TRES PINOS RD	HOLLISTER	SAN BENITO	95023-5566	9/28/2001
326	4280	20346 HWY. 18, UNIT 400	APPLE VALLEY	SAN BERNARDINO	92307-2923	1/31/2010
327	3035	1264 E MAIN ST	BARSTOW	SAN BERNARDINO	92311-2409	5/28/2005
328	2959	42168 BIG BEAR BLVD.	BIG BEAR LAKE	SAN BERNARDINO	92315	3/16/2011
329	2518	11975 CENTRAL AVE.	CHINO	SAN BERNARDINO	91710-1906	7/20/2003
330	3134	4200 CHINO HILLS PKWY, STE 760	CHINO HILLS	SAN BERNARDINO	91709-3776	6/24/2006
331	4682	12949 PEYTON DR	CHINO HILLS	SAN BERNARDINO	91709-6015	6/20/2011
332	3078	1157 MT. VERNON AVENUE	COLTON	SAN BERNARDINO	92324-2577	2/26/2010
333	3078*	1250 E WASHINGTON STREET, STE B	COLTON	SAN BERNARDINO	92324-6434	4/30/2005
334	1808	9976 B SIERRA AVENUE	FONTANA	SAN BERNARDINO	92335-1715	11/14/2000
335	4014	16953 SIERRA LAKES PKWY, SUITE 104	FONTANA	SAN BERNARDINO	92336-1272	3/11/2009
336	5189	15232 SUMMIT AVENUE	FONTANA	SAN BERNARDINO	92336-0231	5/4/2013
337	4450	22455 BARTON RD.	GRAND TERRACE	SAN BERNARDINO	92313-5008	9/15/2010
338	2961	15759 MAIN STREET	HESPERIA	SAN BERNARDINO	92345-3410	11/17/2004
339	1899	4040 HIGHLAND AVE	HIGHLAND	SAN BERNARDINO	92346-2637	4/12/2001
340	5759	25670 REDLANDS BLVD	LOMA LINDA	SAN BERNARDINO	92354	10/5/2014
341	3648	1100 E. BROADWAY	NEEDLES	SAN BERNARDINO	92363-3809	2/13/2008
342	4506	131 E RIVERSIDE DR.	ONTARIO	SAN BERNARDINO	91761-6624	11/23/2010
343	4734	4468 ONTARIO MILLS PKWY.	ONTARIO	SAN BERNARDINO	91764-5107	8/15/2011
344	2445	9743 BASELINE ROAD	RANCHO CUCAMONGA	SAN BERNARDINO	91730-1408	3/17/2003
345	1773	1366 INDUSTRIAL PARK AVE	REDLANDS	SAN BERNARDINO	92374-2897	4/23/2011
346	1773*	811 TRI CITY CENTER DRIVE	REDLANDS	SAN BERNARDINO	92374-2859	10/1/2000
347	4929	182 E BASE LINE ROAD	RIALTO	SAN BERNARDINO	92376-3607	4/26/2012
348	5119	761 W 2ND ST, SUITE A	SAN BERNARDINO	SAN BERNARDINO	92410-3260	1/22/2013
349	5366	2084 E HIGHLAND AVENUE	SAN BERNARDINO	SAN BERNARDINO	92404-4626	2/15/2014
350	5855	1035 W HIGHLAND AVE	SAN BERNARDINO	SAN BERNARDINO	92405-3207	2/28/2015
351	99909A	1751 INTERCHANGE DRIVE	SAN BERNARDINO	SAN BERNARDINO	92407	4/1/2010
352	99909B	1651 INTERCHANGE DRIVE	SAN BERNARDINO	SAN BERNARDINO	92407	4/1/2013
353	4043	71737 29 PALMS HWY.	TWENTYNINE PALMS	SAN BERNARDINO	92277-2084	11/20/2008
354	3440	180 S MOUNTAIN AVE.	UPLAND	SAN BERNARDINO	91786-6256	11/19/2006
355	5754	1387 EAST FOOTHILL BLVD.	UPLAND	SAN BERNARDINO	91786	11/24/2014
356	1504	12160 HESPERIA RD, STE B	VICTORVILLE	SAN BERNARDINO	92395-5820	2/6/2005
357	1855	14792 LA PAZ DRIVE	VICTORVILLE	SAN BERNARDINO	92395-4006	10/31/2001
358	5519	14325 US HIGHWAY 395	VICTORVILLE	SAN BERNARDINO	92394-9591	10/31/2014
359	3241	58100 29 PALMS HWY	YUCCA VALLEY	SAN BERNARDINO	92284-5802	4/17/2008
360	4616	2754 ALPINE BLVD.	ALPINE	SAN DIEGO	91901-2225	6/28/2011
361	2521	1838 MARRON ROAD #E	CARLSBAD	SAN DIEGO	92008-1172	11/2/2003
362	4996	1218 BROADWAY	CHULA VISTA	SAN DIEGO	91911-2911	11/5/2012
363	5034	941 OTAY LAKES RD	CHULA VISTA	SAN DIEGO	91913-3002	10/22/2012
364	3207	796 FLETCHER PKWY	EL CAJON	SAN DIEGO	92020-1816	10/26/2005
365	5502	400 N SECOND ST.	EL CAJON	SAN DIEGO	92021-6446	8/30/2014
366	4162	218 N. EL CAMINO REAL	ENCINITAS	SAN DIEGO	92024-2847	4/30/2009
367	2324	628 N. ESCONDIDO BLVD.	ESCONDIDO	SAN DIEGO	92025-1702	9/29/2002
368	2982*	1349 EAST VALLEY PWY	ESCONDIDO	SAN DIEGO	92027-2311	11/17/2004
369	2982*	1229 E VALLEY PKWY	ESCONDIDO	SAN DIEGO	92027-2309	2/27/2014

Exhibit A - California Dollar Tree Facilities

FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED	
370	3958	1071 S MAIN AVENUE	FALLBROOK	SAN DIEGO	92028-3338	6/26/2008
371	3757	5500 GROSSMONT CENTER DR, STE 428	LA MESA	SAN DIEGO	91942-3016	8/10/2007
372	5543	12340 WOODSIDE AVENUE	LAKESIDE	SAN DIEGO	92040-3016	6/14/2014
373	2889	6 NORTH EUCLID AVENUE	NATIONAL CITY	SAN DIEGO	91950-1934	9/30/2004
374	2507	4161 OCEANSIDE BLVD, SUITE C	OCEANSIDE	SAN DIEGO	92056-6035	5/30/2003
375	3883	3825 PLAZA DRIVE #501	OCEANSIDE	SAN DIEGO	92056-4624	4/4/2008
376	4941	1810 OCEANSIDE BLVD	OCEANSIDE	SAN DIEGO	92054-3474	1/4/2013
377	4988	3861 MISSION AVE, SUITE B-13	OCEANSIDE	SAN DIEGO	92058-1877	8/11/2012
378	5041	12624 POWAY RD. #2	POWAY	SAN DIEGO	92064-4440	9/22/2012
379	5003	1853 MAIN STREET, STE J	RAMONA	SAN DIEGO	92065-2512	7/28/2012
380	2965	3398 MURPHY CANYON RD	SAN DIEGO	SAN DIEGO	92123-2654	11/24/2004
381	3821	6503 UNIVERSITY AVE	SAN DIEGO	SAN DIEGO	92115-5810	11/3/2007
382	4271	8230 MIRA MESA BLVD., SUITE E	SAN DIEGO	SAN DIEGO	92126-2625	10/23/2009
383	5274	4240 KEARNY MESA RD, SUITE 109	SAN DIEGO	SAN DIEGO	92111-3769	7/3/2013
384	5716	3337 ROSECRANS STREET	SAN DIEGO	SAN DIEGO	92110-4223	10/30/2014
385	5733	2483 IMPERIAL AVENUE	SAN DIEGO	SAN DIEGO	92102-3916	1/4/2015
386	5854	4792 CLAIREMONT MESA BLVD	SAN DIEGO	SAN DIEGO	92117-2006	3/20/2015
387	5182	4520 CAMINO DE LA PLAZA	SAN YSIDRO	SAN DIEGO	92173-3104	3/2/2013
388	3194	262 TOWN CENTER PKWY	SANTEE	SAN DIEGO	92071-5803	10/26/2005
389	3195	9805 CAMPO RD, STE 197	SPRING VALLEY	SAN DIEGO	91977-1410	11/15/2005
390	4939	651 SWEETWATER ROAD	SPRING VALLEY	SAN DIEGO	91977-5628	4/24/2012
391	2575	1090 E VISTA WAY	VISTA	SAN DIEGO	92084-4602	11/8/2003
392	4552	1611 S MELROSE DR, STE G	VISTA	SAN DIEGO	92081-5407	6/15/2011
393	5531	2400 MCHENRY AVENUE	ESCALON	SAN JOAQUIN	95320-9602	6/23/2014
394	4403	125 LAKEWOOD MALL	LODI	SAN JOAQUIN	95242-2924	5/24/2010
395	1238	1259 WEST YOSEMITE AVE.	MANTECA	SAN JOAQUIN	95337-5125	11/11/1995
396	2189	1389 E. YOSEMITE AVE.	MANTECA	SAN JOAQUIN	95336-5003	6/29/2002
397	1240	678 N WILSON WAY, STE 37	STOCKTON	SAN JOAQUIN	95205-4269	2/24/1996
398	1260	3728 E. HAMMER LANE #1	STOCKTON	SAN JOAQUIN	95212-2811	11/1/2003
399	1263	4555 NORTH PERSHING AVE. #17	STOCKTON	SAN JOAQUIN	95207-6740	7/17/1998
400	3771	7528 PACIFIC AVE	STOCKTON	SAN JOAQUIN	95207-1929	9/13/2007
401	5193	10408 TRINITY PKWY STE A	STOCKTON	SAN JOAQUIN	95219-7225	7/25/2013
402	5403	1209 E MARCH LANE	STOCKTON	SAN JOAQUIN	95210-3546	10/25/2013
403	5525	3538 MANTHEY RD.	STOCKTON	SAN JOAQUIN	95206-5304	11/10/2014
404	99004	1122 RUNWAY DRIVE	STOCKTON	SAN JOAQUIN	92506	1/1/2000
405	2983	2691 N TRACY BLVD.	TRACY	SAN JOAQUIN	95376-1716	11/24/2004
406	1943	1400 E GRAND AVE, STE A	ARROYO GRANDE	SAN LUIS OBISPO	93420-2424	3/30/2004
407	3631	2040 EL CAMINO REAL	ATASCADERO	SAN LUIS OBISPO	93422-1542	5/9/2007
408	3246	710 QUINTANA RD	MORRO BAY	SAN LUIS OBISPO	93442-1940	1/29/2006
409	2293	2173 THEATER DR	PASO ROBLES	SAN LUIS OBISPO	93446	8/31/2002
410	1485	3870 BROAD STREET, BOX 12	SAN LUIS OBISPO	SAN LUIS OBISPO	93401-7172	2/28/2000
411	4409	491 MADONNA RD., STE 3	SAN LUIS OBISPO	SAN LUIS OBISPO	93405-6541	5/28/2010
412	2782	516 EL CAMINO REAL	BELMONT	SAN MATEO	94002-2121	6/30/2004
413	4429	735 SERRAMONTE BLVD.	COLMA	SAN MATEO	94014-3221	8/19/2010
414	4735	2840 GENEVA AVE.	DALY CITY	SAN MATEO	94014-1523	9/23/2011
415	3847	787 HICKEY BLVD	PACIFICA	SAN MATEO	94044-1214	3/3/2008
416	5544	312 WALNUT STREET	REDWOOD CITY	SAN MATEO	94063-1718	5/3/2014
417	3275	555 EL CAMINO REAL	S SAN FRANCISCO	SAN MATEO	94080-4402	12/2/2006
418	4505	1121 OLD COUNTY RD	SAN CARLOS	SAN MATEO	94070-4009	10/1/2010
419	1502	1009 NORTH H STREET, STE. S	LOMPOC	SANTA BARBARA	93436-3304	8/21/2007
420	1827	1647 NORTH BROADWAY	SANTA MARIA	SANTA BARBARA	93454-1925	1/18/2001
421	5806	525 S BLOSSER RD	SANTA MARIA	SANTA BARBARA	93458-4909	2/28/2015
422	3203	150 N SAN TOMAS AQUINO ROAD	CAMPBELL	SANTA CLARA	95008-1620	11/5/2005
423	3238	2425 S WINCHESTER BLVD	CAMPBELL	SANTA CLARA	95008-4801	4/15/2006
424	2274	1260 1ST STREET	GILROY	SANTA CLARA	95020-4734	8/30/2002
425	1236	1350 S PARK VICTORIA DR #10	MILPITAS	SANTA CLARA	95035-6941	10/24/1995
426	4293	251 RANCH DRIVE	MILPITAS	SANTA CLARA	95035-5106	11/4/2009
427	2785	16975 MONTEREY RD	MORGAN HILL	SANTA CLARA	95037-5134	4/30/2004
428	4978	199 E MIDDLEFIELD RD, STE 200	MOUNTAIN VIEW	SANTA CLARA	94043-3806	9/26/2012
429	1254	331 N CAPITOL AVENUE	SAN JOSE	SANTA CLARA	95133	4/19/1997
430	1270	5546 MONTEREY RD.	SAN JOSE	SANTA CLARA	95138-1529	1/19/2000

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	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
431	2083	5540 SNELL AVE	SAN JOSE	SANTA CLARA	95123-1651	11/14/2001
432	3185	5041 ALMADEN EXPY	SAN JOSE	SANTA CLARA	95118-2008	11/16/2005
433	3764	1178 N. CAPITOL AVE	SAN JOSE	SANTA CLARA	95132-2522	10/17/2007
434	3823	14406 UNION ROAD	SAN JOSE	SANTA CLARA	95124-2815	5/10/2008
435	3853	916 STORY RD	SAN JOSE	SANTA CLARA	95122-2629	3/21/2008
436	4681	2155 TULLY RD.	SAN JOSE	SANTA CLARA	95122-1346	8/26/2011
437	5212	2585 ALMADEN RD	SAN JOSE	SANTA CLARA	95125-3603	5/20/2013
438	5488	3065 MERIDIAN AVE.	SAN JOSE	SANTA CLARA	95124-2455	7/25/2014
439	5522	2222 BUSINESS CIRCLE	SAN JOSE	SANTA CLARA	95128-1619	3/27/2014
440	4547	3024 EL CAMINO REAL	SANTA CLARA	SANTA CLARA	95051-2909	1/30/2011
441	3725	588 E. EL CAMINO REAL	SUNNYVALE	SANTA CLARA	94087-1940	11/8/2007
442	5081	1950 41ST AVE.	CAPITOLA	SANTA CRUZ	95010-2507	9/17/2012
443	3689	2-1515 EAST CLIFF DR	SANTA CRUZ	SANTA CRUZ	95062-4844	11/9/2007
444	3759	266-B MT. HERMON RD	SCOTTS VALLEY	SANTA CRUZ	95066-4010	9/30/2007
445	1519	1075 S GREEN VALLEY ROAD	WATSONVILLE	SANTA CRUZ	95076-4164	4/29/2000
446	5233	1010 MAIN STREET	WATSONVILLE	SANTA CRUZ	95076-3732	5/16/2014
447	1857	2611 BALLS FERRY ROAD	ANDERSON	SHASTA	96007-3507	3/8/2001
448	5903	1725 STATE HWY 273	ANDERSON	SHASTA	96007-4233	2/28/2015
449	4797	9384 DESCHUTES RD, STE F	PALO CEDRO	SHASTA	96073-7703	10/16/2011
450	1221	2385 ATHENS AVENUE	REDDING	SHASTA	96001-2818	8/14/1992
451	1252	40 LAKE BOULEVARD	REDDING	SHASTA	96003-2512	1/30/1997
452	5256	2991 CHURN CREEK RD	REDDING	SHASTA	96002-1120	7/9/2013
453	5400	6478 WESTSIDE RD.	REDDING	SHASTA	96001-4867	11/15/2013
454	1251	1828 FORT JONES ROAD	YREKA	SISKIYOU	96097-9531	11/22/1996
455	5179	856 SOUTHAMPTON RD.	BENICIA	SOLANO	94510-1907	5/4/2013
456	4943	1700 N 1ST STREET	DIXON	SOLANO	95620-9766	6/29/2012
457	2341	2425 N. TEXAS STREET	FAIRFIELD	SOLANO	94533-1603	11/1/2002
458	3973	250 SUNSET AVENUE, STE. A	SUISUN CITY	SOLANO	94585-1766	9/24/2008
459	1235	230 PEABODY RD.	VACAVILLE	SOLANO	95687-4733	9/27/2013
460	1235*	991 ALAMO DRIVE	VACAVILLE	SOLANO	95687-5601	8/19/1995
461	1210	3475 SONOMA BLVD.	VALLEJO	SOLANO	94590-2921	9/25/1992
462	4131	938 ADMIRAL CALLAGHAN LN	VALLEJO	SOLANO	94591-3680	8/19/2009
463	5290	640 EAST COTATI AVENUE	COTATI	SONOMA	94931-4026	11/9/2013
464	2262	1041 VINE ST.	HEALDSBURG	SONOMA	95448-4829	7/31/2002
465	5022	40 E. WASHINGTON STREET	PETALUMA	SONOMA	94952-3115	8/19/2012
466	1868	4675 REDWOOD DRIVE	ROHNERT PARK	SONOMA	94928-7941	3/15/2001
467	2162	777 SEBASTOPOL RD	SANTA ROSA	SONOMA	95407-6827	9/27/2002
468	2168	2747 YULUPA AVE	SANTA ROSA	SONOMA	95405-8534	6/13/2002
469	4593	3589 INDUSTRIAL DR.	SANTA ROSA	SONOMA	95403-2012	4/13/2011
470	5851	3080 Marlow Rd, Suite A-11	SANTA ROSA	SONOMA	95403-7950	1/31/2015
471	3827	18615 SONOMA HWY #103	SONOMA	SONOMA	95476-4400	3/1/2008
472	5269	6748 E WHITMORE AVE	HUGHSON	STANISLAUS	95326-8903	7/14/2013
473	1216	2225 PLAZA PKWY # H	MODESTO	STANISLAUS	95350-6220	9/8/2006
474	1258	1330 E HATCH RD	MODESTO	STANISLAUS	95351-5011	8/14/1997
475	1266	2425 B MCHENRY AVENUE	MODESTO	STANISLAUS	95350-3217	8/13/1998
476	2351	2601 OAKDALE RD.	MODESTO	STANISLAUS	95355-2256	4/20/2008
477	2459	1620 STANDIFORD AVENUE	MODESTO	STANISLAUS	95350-0578	11/18/2004
478	1574	111 S. MAAG AVENUE, SUITE E	OAKDALE	STANISLAUS	95361-7604	2/1/2009
479	3737	1065 SPERRY AVE, STE A	PATTERSON	STANISLAUS	95363-9266	2/3/2008
480	2840	2250 PATTERSON ROAD	RIVERBANK	STANISLAUS	95367-9647	11/18/2004
481	3953	3045 N TEGNER ROAD	TURLOCK	STANISLAUS	95380-9447	4/24/2009
482	4832	2094 E. CANAL DR	TURLOCK	STANISLAUS	95380-4302	3/10/2012
483	4613	12118 YOSEMITE BLVD, STE. 7	WATERFORD	STANISLAUS	95386-9534	4/11/2011
484	1218	1460 BRIDGE STREET	YUBA CITY	SUTTER	95993-3506	10/10/1991
485	2486	1936 SOLANO STREET	CORNING	TEHAMA	96021-2831	5/3/2003
486	1230	398 SOUTH MAIN STREET	RED BLUFF	TEHAMA	96080-4314	11/13/1993
487	3184	1401 W EL MONTE WAY, STE. 130	DINUBA	TULARE	93618-9165	7/29/2006
488	5237	424 N KAWEAH AVE	EXETER	TULARE	93221-1224	9/10/2013
489	3493	1555 N FARMERSVILLE BLVD, SUITE 201	FARMERSVILLE	TULARE	93223-1175	3/15/2007
490	5234	258 N HWY 65	LINDSAY	TULARE	93247	8/31/2013
491	1245	1373 WEST HENDERSON AVE.	PORTERVILLE	TULARE	93257-1456	7/5/1996

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	FACILITY NO.	ADDRESS	CITY	COUNTY	ZIP	OPENED
492	1207	130 EAST CROSS AVE.	TULARE	TULARE	93274-2850	10/9/1997
493	1253	2333 SOUTH MOONEY BLVD	VISALIA	TULARE	93277-6228	2/28/1997
494	4142	1927 N DINUBA BLVD	VISALIA	TULARE	93291-3011	10/16/2009
495	2122	13771 MONO WAY, SUITE D	SONORA	TUOLUMNE	95370-2820	2/21/2002
496	5599	2291 PICKWICK DRIVE	CAMARILLO	VENTURA	93010-6409	7/2/2014
497	3753	745 VENTURA RD	FILLMORE	VENTURA	93015-1834	2/29/2008
498	5464	543-B W LOS ANGELES AVE.	MOORPARK	VENTURA	93021-1707	5/3/2014
499	4223	737 N. WENDY DRIVE	NEWBURY PARK	VENTURA	91320-3066	10/16/2009
500	2237	838 NORTH VENTURA ROAD	OXNARD	VENTURA	93030-4414	3/31/2003
501	4687	150 W LAUREL ST.	OXNARD	VENTURA	93033-4561	10/1/2011
502	3874	729 W CHANNEL ISLAND BOULEVARD	PORT HUENEME	VENTURA	93041-2130	2/3/2008
503	2963	588 WEST MAIN STREET, BLDG A	SANTA PAULA	VENTURA	93060-3209	11/23/2004
504	2585	2970 COCHRAN ST.	SIMI VALLEY	VENTURA	93065-2784	11/1/2003
505	3999	1760 N MOORPARK RD	THOUSAND OAKS	VENTURA	91360-5133	1/29/2012
506	4315	4738 TELEPHONE RD, STE 2	VENTURA	VENTURA	93003-5245	3/12/2010
507	3475	1800 E. 8TH STREET	DAVIS	YOLO	95616-2502	9/3/2006
508	1215	3015 WEST CAPITAL AVENUE	WEST SACRAMENTO	YOLO	95691-2912	4/7/2003
509	5241	2105 TOWN CENTER PLAZA, STE F120	WEST SACRAMENTO	YOLO	95691-4991	6/24/2013
510	1206	18 WEST COURT STREET	WOODLAND	YOLO	95695-3012	3/18/1994
511	4760	441 PIONEER AVE, STE. 110	WOODLAND	YOLO	95776-5189	9/16/2011
512	1211	1409 B STREET	MARYSVILLE	YUBA	95901-4211	4/26/1997

*These stores were either closed or relocated by Dollar Tree Stores, Inc. prior to the date of this Complaint.