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13 *Attorneys for Plaintiff,
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14 *[Additional Plaintiff's Counsel Continued on Attachment A]*

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF ALAMEDA

17 **THE PEOPLE OF THE STATE OF**
18 **CALIFORNIA,**

19 Plaintiff,

20 v.

21 **WALGREEN CO., an Illinois Corporation;**
22 **and DOES 1 through 25, inclusive,**

23 Defendants.

Case No. RG12635137

**FIRST AMENDED 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.*; Civ.
Code §§ 56, *et seq.*)

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 E. O'Malley, District
28 Attorney of Alameda County; Todd D. Riebe, District Attorney of Amador County; Michael L.

ENDORSED
FILED
ALAMEDA COUNTY

JUL 09 2012

CLERK OF THE SUPERIOR COURT

By A. MENDOLA

Deputy

1 Ramsey, District Attorney of Butte County; Mark A. Peterson, District Attorney of Contra Costa
2 County; Vern Pierson, District Attorney of El Dorado County; Elizabeth Egan, District Attorney
3 of Fresno County; Robert Maloney, District Attorney of Glenn County; Paul Gallegos, District
4 Attorney of Humboldt County; Lisa S. Green, District Attorney of Kern County; Robert M.
5 Burns, District Attorney of Lassen County; Steve Cooley, District Attorney of Los Angeles
6 County; Carmen A. Trutanich, City Attorney of Los Angeles; Michael R. Keitz, District Attorney
7 of Madera County; Edward S. Berberian, Jr., District Attorney of Marin County; Larry Morse,
8 District Attorney of Merced County; Dean D. Flippo, District Attorney of Monterey County;
9 Tony Rackauckas, District Attorney of Orange County; R. Scott Owens, District Attorney of
10 Placer County; Paul Zellerbach, District Attorney of Riverside County; Jan Scully, District
11 Attorney of Sacramento County; Michael A. Ramos, District Attorney of San Bernardino County;
12 Bonnie M. Dumanis, District Attorney of San Diego County; Jan Goldsmith, City Attorney of
13 San Diego; George Gascón District Attorney of San Francisco; James P. Willett, District Attorney
14 of San Joaquin County; Gerald T. Shea, District Attorney of San Luis Obispo County; Stephen
15 M. Wagstaffe, District Attorney of San Mateo County; Jeff Rosen, District Attorney of Santa
16 Clara County; Bob Lee, District Attorney of Santa Cruz County; Stephen Carlton, District
17 Attorney of Shasta County; Donald A. du Bain, District Attorney of Solano County; Jill Ravitch,
18 District Attorney of Sonoma County; Birgit Fladager, District Attorney of Stanislaus County;
19 Carl V. Adams, District Attorney of Sutter County; Phillip Cline, District Attorney of Tulare
20 County; Gregory D. Totten, District Attorney of Ventura County; Jeff Reisig, District Attorney of
21 Yolo County; and Patrick McGrath, District Attorney of Yuba County (collectively
22 “Prosecutors”).

23 2. Pursuant to Health and Safety Code section 25182, the Prosecutors may bring a
24 civil action in the name of the People of the State of California to enjoin any violation of Chapter
25 6.5 of Division 20 of the Health and Safety Code (hereinafter “Chapter 6.5”) and to seek civil
26 penalties for violations of the provisions of Chapter 6.5.

27 3. Pursuant to Health and Safety Code sections 25516 and 25516.1, the Prosecutors
28 may bring a civil action in the name of the People of the State of California to enjoin any

1 violation of Health and Safety Code sections 25503.5 to 25505, inclusive, and sections 25508 to
2 25520, inclusive, of Chapter 6.95 of Division 20 of the Health and Safety Code (hereinafter
3 “Chapter 6.95”).

4 4. Pursuant to Health and Safety Code sections 117830, subdivision (c), 118325 and
5 118345, subdivision (b), the Prosecutors may bring a civil action in the name of the People of the
6 State of California to enjoin any violation of sections 117600, *et seq.* of the Health and Safety
7 Code and to seek civil penalties for violations of the provisions thereof.

8 5. Pursuant to Civil Code section 56.36, subdivision (e)(1)(B), the Prosecutors may
9 bring a civil action in the name of the People of the State of California to seek civil penalties for
10 violations of Civil Code sections 56, *et seq.*

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

16 7. Plaintiff brings this action without prejudice to any other action or claim which
17 Plaintiff may have based on separate, independent and unrelated violations arising out of matters
18 or allegations that are not set forth in this First Amended Complaint.

19 **DEFENDANT WALGREEN CO.**

20 8. Defendant Walgreen Co. (hereinafter “Walgreen”) is now, and at all times
21 mentioned in this First Amended Complaint was, an Illinois corporation that does and did
22 business in its own capacity and/or through agents and affiliates in the State of California at the
23 Walgreen facilities identified in Exhibit A (hereinafter collectively referred to as “California
24 Facilities”). The California Facilities are located throughout California, and Walgreen’s principal
25 corporate office is in Deerfield, Illinois.

26 9. The People are informed and believe, and thereon allege, that Walgreen is the
27 owner and/or operator of the California Facilities.

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1 10. At all times relevant hereto and as more fully alleged in paragraph 40, below,
2 Walgreen has stocked, transported, stored and sold hazardous materials at and from the California
3 Facilities. These hazardous materials include, but are not limited to, over-the-counter
4 medications, aerosol products, fertilizers, ignitable liquids, batteries, electronic devices, mercury-
5 containing lamps, paints, pesticides, pool chemicals, and other toxic, reactive, ignitable and/or
6 corrosive materials. Walgreen also generated regulated quantities of hazardous waste at each of
7 the California Facilities as a result of various causes including, but not limited to, damage to
8 containers, spills and releases of hazardous materials, sharps waste, pharmaceutical waste, photo
9 waste containing silver, and various hazardous wastes generated from customer returns of
10 hazardous products.

11 11. At all times relevant hereto, Walgreen was and is legally responsible for
12 compliance with the provisions of the Health and Safety Code, including Chapters 6.5 and 6.95 of
13 Division 20 and sections 117600, *et seq.*, and for compliance with sections 56, *et seq.* of the Civil
14 Code, at the California Facilities. The People are informed and believe, and based thereon allege
15 that, at all relevant times, Walgreen controlled, managed, directed and was responsible for the
16 operations of the California Facilities, and/or aided and abetted, managed, directed or acted in
17 concert with persons who exercised control over those operations. The People are informed and
18 believe, and based thereon allege, that at all relevant times, Walgreen was legally responsible for
19 all acts and omissions of its officers, directors, agents, employees, contractors, vendors, affiliates,
20 and/or representatives relating to the management of hazardous materials and hazardous waste,
21 medical waste, and confidential medical information at the California Facilities, and/or that
22 Walgreen failed to take appropriate steps to prevent and/or correct the violations alleged herein
23 despite having power, authority and notice sufficient to do so.

24 12. Walgreen is a "person," as defined in Health and Safety Code sections 25118 and
25 117745 and Business & Professions Code section 17201, and a "business," as defined in Health
26 and Safety Code section 25501, subdivision (e).

27 13. Walgreen is a "pharmaceutical company," as defined in Civil Code section 56.05,
28 subdivision (h).

1 be included in computing the time limited by any statutes of limitation applicable to the claims
2 covered by the tolling agreement.

3 STATUTORY AND REGULATORY BACKGROUND

4 19. The State of California has enacted a comprehensive statutory and regulatory
5 framework for the generation, handling, treatment, storage, transportation, and disposal of
6 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and
7 Safety Code, sections 25100, *et seq.*, and its implementing regulations, which are found at Title
8 22 of the California Code of Regulations section 66260.1, *et seq.*, mandates a “cradle to grave”
9 system known as the Hazardous Waste Control Law (“HWCL”). The HWCL system is
10 maintained to record the generation, registration, tracking, storage, treatment, and disposal of
11 hazardous wastes and to provide for the protection of the public and the environment from present
12 or potential risks posed by hazardous wastes.

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

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

22 22. Companies that accumulate or generate hazardous waste in the course of their
23 operations and send such waste offsite for management, treatment, storage or disposal are subject
24 to certain regulatory requirements. (See Cal. Code Regs., tit 22, § 66262.10, *et seq.*)

25 23. The State of California has enacted a comprehensive statutory and regulatory
26 framework for the notification, handling, training and spill/release reporting of hazardous
27 materials. This framework is contained in Chapter 6.95 of Division 20 of the Health and Safety
28 Code, sections 25500, *et seq.*, and its implementing regulations, known as the Hazardous

1 Materials Release Response Plans and Inventory Law. In order to better inform the public and to
2 assist emergency responders, Chapter 6.95 has, for over twenty (20) years, mandated that basic
3 information on the location, type, quantity, and the health risks of hazardous materials handled,
4 used, stored, or disposed of in the State, which could be accidentally released into the
5 environment, be made available to firefighters, health officials, planners, public safety officers,
6 health care providers, regulatory agencies and other interested persons.

7 24. California has enacted a comprehensive statutory framework to govern the
8 management of medical waste in order to protect the public and the environment from potentially
9 infectious disease causing agents and other hazards. This framework is known as the Medical
10 Waste Management Act ("MWMA") and it contains requirements related to the generation,
11 handling, storage, treatment, transport, and disposal of medical waste in California. The MWMA
12 is found at Health and Safety Code section 117600, *et seq.*

13 25. California enacted the Confidentiality of Medical Information Act ("CMIA") to
14 protect the rights of individuals and the privacy of their medical information. The CMIA regulates
15 to whom, when and why individual medical information may be disclosed. Entities covered by
16 the CMIA include pharmaceutical companies. The CMIA is found in Civil Code sections 56, *et*
17 *seq.*

18 **ENFORCEMENT AUTHORITY**

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

25 27. Section 118345 of the Health and Safety Code imposes civil liability for any
26 violation of the MWMA, for violation of any order issued pursuant to section 118330 of the
27 Health and Safety Code, or for any violation of a regulation promulgated pursuant to the MWMA.

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

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

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

25 38. Plaintiff is informed and believes and thereupon alleges that Defendants, and each
26 of them, have violated provisions of the following statutes, including implementing regulations
27 associated with each of the statutes and any related permit, rule, standard, or requirement issued
28 or promulgated pursuant to these statutes, at the California Facilities within the time period

1 applicable to this action: Chapter 6.5 of the Health and Safety Code, sections 25100, *et seq.*;
2 Chapter 6.95 of the Health and Safety Code, sections 25500, *et seq.*; Health and Safety Code
3 sections 117600, *et seq.*; California Civil Code section 56.101; Business and Professions Code
4 sections 17200, *et seq.*; and in addition to the time tolled pursuant to Tolling Agreements
5 referenced in paragraph 18.

6 39. Examples of acts and/or omissions committed by Defendants, which constitute
7 violations of California environmental laws and regulations and California laws governing
8 confidential medical information, are listed in the subparagraphs below. These instances of
9 violations of California law are not an exhaustive list of violations but are alleged herein by way
10 of examples of past, ongoing and persistent violations:

- 11 a. On or about December 14, 2011, Defendants, at a California Facility in Monterey
12 County, disposed of batteries into a trash bin for transportation by a garbage hauler
13 not registered to transport hazardous waste, and bound for a point not authorized to
14 receive hazardous waste. Additionally, Defendants disposed of customer records
15 containing confidential medical information without preserving the confidentiality
16 of the information contained therein.
- 17 b. On or about December 12, 2011, Defendants, at California Facilities in Tulare
18 County, disposed of liquid corrosive waste into a trash bin for transportation by a
19 garbage hauler not registered to transport hazardous waste, and bound for a point
20 not authorized to receive hazardous waste. Additionally, Defendants disposed of
21 customer records containing confidential medical information without preserving
22 the confidentiality of the information contained therein.
- 23 c. On or about December 1, 2011, Defendants, at a California Facility in Monterey
24 County, disposed of batteries into a trash bin for transportation by a garbage hauler
25 not registered to transport hazardous waste, and bound for a point not authorized to
26 receive hazardous waste. Additionally, Defendants disposed of customer records
27 containing confidential medical information without preserving the confidentiality
28 of the information contained therein.

- 1 d. On or about November 21, 2011, Defendants, at a California Facility in Alameda
2 County, disposed of batteries, into a trash bin for transportation by a garbage
3 hauler not registered to transport hazardous waste, and bound for a point not
4 authorized to receive hazardous waste. Additionally, Defendants disposed of a
5 customer record containing confidential medical information without preserving
6 the confidentiality of the information contained therein.
- 7 e. On or about November 18, 2011, Defendants, at a California Facility in Humboldt
8 County, disposed of batteries, mercury-containing lamps, and pharmaceutical
9 waste, into a trash bin for transportation by a garbage hauler not registered to
10 transport hazardous waste, and bound for a point not authorized to receive
11 hazardous waste. Additionally, Defendants disposed of customer records
12 containing confidential medical information without preserving the confidentiality
13 of the information contained therein.
- 14 f. On or about November 17, 2011, Defendants, at California Facilities in Humboldt
15 County, disposed of an ignitable aerosol waste, batteries, a mercury-containing
16 lamp, and ignitable liquid hazardous waste, into a trash bin for transportation by a
17 garbage hauler not registered to transport hazardous waste, and bound for a point
18 not authorized to receive hazardous waste.
- 19 g. On or about October 24, 2011, Defendants, at California Facilities in Fresno
20 County, disposed of ignitable aerosol wastes, batteries, e-waste, mercury-
21 containing light bulbs, pharmaceutical waste, and toxic liquid waste into a trash
22 bin for transportation by a garbage hauler not registered to transport hazardous
23 waste, and bound for a point not authorized to receive hazardous waste.
24 Additionally, Defendants disposed of customer records containing confidential
25 medical information without preserving the confidentiality of the information
26 contained therein.
- 27 h. On or about October 17, 2011, Defendants, at California Facilities in Alameda
28 County, disposed of ignitable aerosol waste, batteries, e-waste, and pharmaceutical

1 waste into a trash bin for transportation by a garbage hauler not registered to
2 transport hazardous waste, and bound for a point not authorized to receive
3 hazardous waste.

- 4 i. On or about October 17, 2011, Defendants, at a California Facility in San Diego
5 County, disposed of batteries and ignitable liquid waste into a trash bin for
6 transportation by a garbage hauler not registered to transport hazardous waste, and
7 bound for a point not authorized to receive hazardous waste. Additionally,
8 Defendants disposed of customer records containing confidential medical
9 information without preserving the confidentiality of the information contained
10 therein.
- 11 j. On or about October 14, 2011, Defendants, at California Facilities in Fresno
12 County, disposed of batteries and pharmaceutical waste into a trash bin for
13 transportation by a garbage hauler not registered to transport hazardous waste, and
14 bound for a point not authorized to receive hazardous waste. Additionally,
15 Defendants disposed of customer records containing confidential medical
16 information without preserving the confidentiality of the information contained
17 therein.
- 18 k. On or about October 11, 2011, Defendants, at California Facilities in San Diego
19 County, disposed of batteries and a mercury-containing light bulb, into a trash bin
20 for transportation by a garbage hauler not registered to transport hazardous waste,
21 and bound for a point not authorized to receive hazardous waste. Additionally,
22 Defendants disposed of customer records containing confidential medical
23 information without preserving the confidentiality of the information contained
24 therein.
- 25 l. On or about September 14, 2011, Defendants, at California Facilities in Santa
26 Clara County, disposed of pharmaceutical waste and ignitable liquid waste into a
27 trash bin for transportation by a garbage hauler not registered to transport
28 hazardous waste, and bound for a point not authorized to receive hazardous waste.

1 Additionally, Defendants disposed of customer records containing confidential
2 medical information without preserving the confidentiality of the information
3 contained therein.

4 m. On or about July 27, 2011, Defendants, at a California Facility in Ventura County,
5 disposed of batteries, pharmaceutical waste, e-waste, ignitable liquid waste, and
6 toxic liquid waste, into a trash bin for transportation by a garbage hauler not
7 registered to transport hazardous waste, and bound for a point not authorized to
8 receive hazardous waste. Additionally, Defendants disposed of customer records
9 containing confidential medical information without preserving the confidentiality
10 of the information contained therein.

11 n. On or about May 10, 2011, Defendants, at a California Facility in Yolo County,
12 disposed of ignitable aerosol wastes, batteries, pharmaceutical waste, mercury-
13 containing bulbs, latex paint, and toxic liquid waste, into a trash bin for
14 transportation by a garbage hauler not registered to transport hazardous waste, and
15 bound for a point not authorized to receive hazardous waste.

16 o. On or about May 2, 2011, Defendants, at a California Facility in Yolo County,
17 disposed of a customer record containing confidential medical information without
18 preserving the confidentiality of the information contained therein.

19 p. On or about July 14, 2011, as learned of during a routine inspection at a California
20 Facility in Sacramento County, Defendants improperly disposed of fourteen (14)
21 “AA” batteries, failed to keep hazardous waste manifests from the designated
22 facility for three (3) years, failed to properly label hazardous waste containers,
23 failed to make proper waste determinations, failed to conduct weekly inspections,
24 and failed to properly segregate incompatible wastes.

25 q. On or about November 17, 2011, as learned of during a routine inspection at a
26 California Facility in San Joaquin County, Defendants disposed of or caused the
27 disposal of pharmaceutical waste, failed to keep hazardous waste manifests from
28 the designated facility for three (3) years, failed to properly label hazardous waste

1 containers, failed to make proper waste determinations, failed to conduct weekly
2 inspections, and failed to properly segregate incompatible wastes.

3 r. On or about December 8, 2011, as learned of during a routine inspection at a
4 California Facility in San Diego County, Defendants improperly stored a full
5 sharps container longer than 30 days, failed to keep hazardous waste manifests
6 from the designated facility for three (3) years, failed to properly label hazardous
7 waste containers, failed to make proper waste determinations, failed to conduct
8 weekly inspections, and failed to properly segregate incompatible wastes.

9 s. On or about December 27, 2011, as learned during a routine inspection at a
10 California Facility in Riverside County, Defendants improperly disposed of
11 pharmaceutical waste, failed to keep manifests from the designated facility for
12 three (3) years, failed to properly label hazardous waste containers, failed to make
13 proper waste determinations, and failed to demonstrate employee training in the
14 handling of hazardous waste.

15 40. Plaintiff alleges that Defendants, and each of them, at all times relevant hereto,
16 including the period of time spanned by the series of Tolling Agreements, and continuing from
17 and after the date of filing of this First Amended Complaint, caused and/or performed each of the
18 acts and/or omissions in violation of California law in the ownership and/or operation of the
19 California Facilities as alleged below:

- 20 a. Disposed of, or caused the disposal of, hazardous waste at a point not authorized,
21 in violation of Health and Safety Code sections 25189 and 25189.2, including in
22 drains at California Facilities, onto the surface or subsurface of the ground at
23 unauthorized locations, and at landfills not authorized to accept commercial/retail
24 hazardous waste and other locations not authorized to receive hazardous waste;
- 25 b. Transported hazardous waste to unauthorized locations, including, without
26 limitation, WALGREEN return and distribution centers, in violation of California
27 Code of Regulations, title 22, section 66263.23;

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- 1 c. Transported hazardous waste at, to, from and between California Facilities on
2 vehicles that did not hold a valid registration issued by the DTSC, in violation of
3 Health and Safety Code section 25163;
- 4 d. Knowingly caused to be deposited, without the permission of the owner, hazardous
5 substances upon the land of another, in violation of Penal Code section 374.8,
6 subdivision (b);
- 7 e. Failed to properly dispose of confidential medical information pursuant to
8 California Civil Code sections 56, *et seq.*, of the CMIA;
- 9 f. Failed to determine if a generated waste including, but not limited to, items
10 returned by customers to California Facilities, and wastes generated at California
11 Facilities via spills, container breakage, and other means, were hazardous wastes,
12 as required by Title 22 of the California Code of Regulations section 66262.11,
13 and, where such waste was hazardous, failed to handle the hazardous waste in
14 accordance with the requirements of Chapter 6.5 of the Health and Safety Code
15 and its implementing regulations in Title 22 of the California Code of Regulations,
16 including, but not limited to, section 66265.172 (compatible contents), and section
17 66265.177 (placing incompatible waste streams in the same container);
- 18 g. Failed to take appropriate corrective action and/or respond to notices of violation
19 within the period specified pursuant to Health and Safety Code section 25185;
- 20 h. Failed to achieve compliance and/or provide proof of such compliance with
21 notices to comply within the time period specified pursuant to Health and Safety
22 Code section 25187.8;
- 23 i. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of
24 the California Code of Regulations section 66260.200;
- 25 j. Failed to determine if hazardous waste had to be treated before it could be land
26 disposed by testing the waste or using generator knowledge of the waste, in
27 violation of Title 22 of the California Code of Regulations section 66268.7,
28 subdivision (a);

- 1 k. Failed to keep records of any test results, waste analysis, or other determinations
2 made in accordance with section 66262.11 for at least three (3) years from the date
3 that the waste was last sent to on-site or off-site treatment, storage, or disposal, in
4 violation of Title 22 of the California Code of Regulations, section 66262.40(c);
- 5 l. Failed to properly manage, identify the accumulation start date, and properly label
6 containers of hazardous waste at California Facilities, in violation of California
7 Code of Regulations, title 22, section 66262.34;
- 8 m. Failed to properly manage, mark, and store hazardous waste aerosol cans, in
9 violation of section 25201.16 of the California Health and Safety Code;
- 10 n. Failed to use and/or maintain containers holding hazardous waste at the California
11 Facilities so as to prevent leaks, in violation of Title 22 of the California Code of
12 Regulations section 66265.173 and Code of Federal Regulations section 265.171;
- 13 o. Failed to keep containers of hazardous waste closed and/or sealed, except when
14 removing or adding hazardous waste, in violation of Title 22 of the California
15 Code of Regulations section 66265.173;
- 16 p. Failed to comply with employee training obligations pertaining to handling of
17 hazardous waste at California Facilities, in violation of California Code of
18 Regulations, Title 22, section 66265.16.
- 19 q. Failed to handle hazardous waste from customer returns to California Facilities,
20 and hazardous waste generated at California Facilities by spills, container
21 breakage, and other means, in accordance with the requirements of Chapter 6.5 of
22 the Health & Safety Code and its implementing regulations in the California Code
23 of Regulations, Title 22;
- 24 r. Failed to obtain and keep current all required hazardous waste generator permits
25 required by county and local ordinances;
- 26 s. Treated, stored, disposed of, transported, and offered for transportation, hazardous
27 waste without having received and used a proper identification number from the
28 U.S. Environmental Protection Agency or DTSC for the originating facility, in

1 violation of Title 22 of the California Code of Regulations section 66262.12,
2 subdivision (a);

3 t. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous
4 waste facilities permit, in violation of Health and Safety Code section 25201(a)
5 and Title 22 of the California Code of Regulations section 66270.1;

6 u. Stored hazardous waste onsite beyond the time permitted by law at a facility which
7 did not have a hazardous waste storage permit from the California Department of
8 Toxic Substances Control ("DTSC"), in violation of Title 22 of the California
9 Code of Regulations section 66262.34, and California Health and Safety Code
10 section 25123.3, subdivision (h);

11 v. Failed to retain copies of all required hazardous waste manifests for three (3)
12 years, in violation of Health and Safety Code sections 25160, subdivisions (a) and
13 (b) 25160.2, subdivision (b)(3), and Title 22 of the California Code of Regulations
14 section 66262.40, subdivision (a). As used in this paragraph "manifest" means a
15 shipping document originated and signed by a generator of hazardous waste that
16 contains all of the information required by law and that complies with all
17 applicable federal and state regulations, and includes, but is not limited to,
18 receipts;

19 w. Failed to submit to DTSC a legible copy of each manifest used within thirty (30)
20 days of each shipment of hazardous waste off-site or into California, in violation
21 of Title 22 of the California Code of Regulations section 66262.23, subdivision
22 (a)(4);

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

- 1 y. Failed to submit an Exception Report to DTSC 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 which was to receive the hazardous waste within forty-five (45)
4 days of the date the waste was accepted by the initial transporter, in violation of
5 Title 22 of the California Code of Regulations section 66262.42, subdivision (b)
6 and Health and Safety Code section 25123.3(h)(2);
- 7 z. Failed to comply with the requirements of Title 40 of the Code of Federal
8 Regulations, section 262.34, subdivisions (d) – (f), requiring generators to
9 designate an employee at all times as the emergency coordinator and post the
10 required information listed on Section 262.34, subdivision (d)(5)(i) - (iv), in
11 violation of Title 22 of the California Code of Regulations section 66262.34,
12 subdivision (d)(2);
- 13 aa. Failed to keep a copy of each manifest signed in accordance with Title 22 of the
14 California Code of Regulations section 66262.23, subdivision (a), for three (3)
15 years or until the generator received a signed copy from the designated facility
16 which received the hazardous waste, in violation of Title 22 of the California Code
17 of Regulations section 66262.40, subdivision (a);
- 18 bb. Failed to properly manage, mark, and store universal waste, in violation of Title 22
19 of the California Code of Regulations sections 66273.13 - 66273.16 (repealer filed
20 2-4-2009) and sections 66273.33 – 66273.36;
- 21 cc. Failed to keep a record with the information required by section 66273.39,
22 subdivisions (a)(1) – (3), of each shipment of universal waste received at the
23 universal waste handler’s facility, in violation of Title 22 of the California Code of
24 Regulations section 66273.39;
- 25 dd. Failed to prepare and maintain hazardous waste manifests, in violation of
26 California Code of Regulations, title 22, sections 66260, *et seq.*;

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- 1 ee. Failed to treat returned or discarded non-empty aerosol cans at California Facilities
2 as universal waste or hazardous waste, in violation of California Code of
3 Regulations, title 22, Chapter 23, sections 66273.1, *et seq.*;
- 4 ff. Failed to label containers of hazardous waste before transporting hazardous waste
5 from California Facilities, in violation of California Code of Regulations, title 22,
6 section 66262.31;
- 7 gg. Failed to implement, maintain and comply with an employee training program
8 meeting the requirements of Health and Safety Code section 25504, subdivisions
9 (a) and (c), and Title 19 of the California Code of Regulations section 2732,
10 pertaining to hazardous materials, and business and area plans;
- 11 hh. Failed to implement and maintain a business emergency plan for emergency
12 response to a release or threatened release of hazardous materials, in violation of
13 Health and Safety Code section 25503.5;
- 14 ii. Failed to implement, maintain or to submit to the administering agency (as defined
15 in Health and Safety Code sections 25501 and 25502), a complete hazardous
16 materials business plan for each California Facility, in violation of Health and
17 Safety Code sections 25504 and 25505, and section 2729 of Title 19 of the
18 California Code of Regulations;
- 19 jj. Failed to comply with the California MWMA, Health and Safety Code sections
20 117600, *et seq.*, by failing to have a Medical Waste Management Plan, failing to
21 retain on file disposal receipts and tracking documents for waste shipped offsite
22 for three (3) years, and improperly storing, transporting, and disposing of
23 pharmaceutical wastes;
- 24 kk. Failed to take all reasonable steps to destroy, or arrange for the destruction of,
25 customers' records within its custody or control which contain confidential
26 medical information that is no longer to be retained by the business in a manner
27 that preserves the confidentiality of the information contained therein in violation
28 of California Civil Code section 56.101;

1 **SECOND CAUSE OF ACTION**

2 (Strict Liability for Disposal of Hazardous Waste at a Point Not Authorized)
3 (Health and Safety Code, §25189, subd. (d))

4 47. Plaintiff realleges paragraphs 1 through 46, inclusive.

5 48. Health and Safety Code Section 25189, subdivision (d), prohibits the negligent
6 disposal of hazardous waste at an unauthorized point.

7 49. Defendants, and each of them, have negligently disposed and/or caused the
8 disposal of hazardous waste originating from the California Facilities at unauthorized points, in
9 violation of California Health and Safety Code section 25189, subdivision (d), and unless
10 enjoined by order of the Court, Defendants, and each of them, may or will continue in the course
11 of conduct as alleged herein.

12 50. Each negligent disposal of hazardous waste at an unauthorized point discovered
13 within five (5) years of commencing this action, in addition to any applicable tolling periods and
14 those set forth in paragraph 18 herein, and each day the waste was allowed to remain at such point
15 without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a
16 separate and additional civil penalty under Health and Safety Code section 25189, subdivision
17 (d).

18 51. Based on the above, the People request injunctive relief against Defendants under
19 Health and Safety Code section 25181, and civil penalties under Health and Safety Code sections
20 25189, subdivision (d), as described in the People's prayer for relief.

21 **THIRD CAUSE OF ACTION**

22 (Strict Liability for Disposal of Hazardous Waste at a Point Not Authorized)
23 (Health & Safety Code, § 25189.2, subd. (c))

24 52. Plaintiff realleges paragraphs 1 through 51, inclusive.

25 53. Health and Safety Code section 25189.2, subdivision (c) prohibits the disposal of
26 hazardous waste at an unauthorized point as a matter of strict liability.

27 54. Defendants, and each of them, have disposed of and/or caused the disposal of
28 hazardous waste originating from the California Facilities at unauthorized points, in violation of
California Health and Safety Code section 25189.2, subdivision (c), and unless enjoined by order

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1 of the Court, Defendants, and each of them, may or will continue in the course of conduct as
2 alleged herein.

3 55. Each disposal of hazardous waste at an unauthorized point discovered within five
4 (5) years of commencing this action, in addition to any applicable tolling periods and those set
5 forth in paragraph 18 herein, and each day the waste was allowed to remain at such point without
6 the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a separate
7 and additional civil penalty under Health and Safety Code section 25189.2, subdivision (c).

8 56. Based on the above, the People request injunctive relief against Defendants under
9 Health and Safety Code section 25181, and civil penalties under Health and Safety Code sections
10 25189.2, subdivision (c), as described in the People's prayer for relief.

11 **FOURTH CAUSE OF ACTION**

12 (Intentional Unauthorized Transportation of Hazardous Waste)
(Health & Safety Code, §§ 25163 and 25189, subd. (b); Cal. Code Regs., tit. 22, § 66263.23)

13 57. Plaintiff realleges paragraphs 1 through 56, inclusive.

14 58. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized
15 transportation, or causing the transportation, of hazardous waste. Section 25163 prohibits the
16 transportation of hazardous waste without a valid registration from DTSC. California Code of
17 Regulations, title 22, section 66263.23 subdivision (b) prohibits the transportation of hazardous
18 waste to a location not permitted or otherwise authorized by the DTSC to receive the waste.

19 59. Defendants, and each of them, have intentionally engaged in the transportation, or
20 causing the transportation, of hazardous waste itself, or by a waste hauler, without a valid
21 registration from the DTSC, from the California Facilities to unauthorized locations, in violation
22 of Health and Safety Code section 25163 and California Code of Regulations, title 22, section
23 66263.23.

24 60. Each intentional act of unauthorized transportation that the People discovered
25 within five (5) years of commencing this action, in addition to any applicable tolling periods and
26 those set forth in paragraph 18 herein, and each day the waste was allowed to remain at such point
27 without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a
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1 separate and additional civil penalty under Health and Safety Code section 25189, subdivision
2 (b).

3 61. Based on the above, the People request injunctive relief against Defendants under
4 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
5 25189, subdivision (b), as described in the People's prayer for relief.

6 **FIFTH CAUSE OF ACTION**

7 (Negligent Unauthorized Transportation of Hazardous Waste)
(Health & Safety Code, §§ 25163 and 25189, subd. (b); Cal. Code Regs., tit. 22, § 66263.23)

8 62. Plaintiff realleges paragraphs 1 through 61, inclusive.

9 63. 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 hazardous
13 waste to a location not permitted or otherwise authorized by the DTSC to receive the waste.

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

19 65. Each negligent act of unauthorized transportation that the People discovered
20 within five (5) years of commencing this action, in addition to any applicable tolling periods and
21 those set forth in paragraph 18 herein, and each day the waste was allowed to remain at such point
22 without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a
23 separate and additional civil penalty under Health and Safety Code section 25189, subdivision
24 (b).

25 66. Based on the above, the People request injunctive relief against Defendants under
26 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
27 25189, subdivision (b), as described in the People's prayer for relief.

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1 **SIXTH CAUSE OF ACTION**

2 (Strict Liability for Unauthorized Transportation of Hazardous Waste)
3 (Health & Safety Code, §§ 25163 and 25189.2, subd. (b); Cal. Code Regs., tit. 22, § 66263.23)

4 67. Plaintiff realleges paragraphs 1 through 66, inclusive.

5 68. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized
6 transportation, or causing the transportation, of hazardous waste. Section 25163 prohibits the
7 transportation of hazardous waste without a valid registration from DTSC. California Code of
8 Regulations, title 22, section 66263.23(b) prohibits the transportation of hazardous waste to a
9 location not permitted or otherwise authorized by the DTSC to receive the waste.

10 69. Defendants, and each of them, have engaged in the transportation, or causing the
11 transportation, of hazardous waste itself, or by a waste hauler, without a valid registration from
12 the DTSC, from the California Facilities to unauthorized locations, in violation of Health and
13 Safety Code section 25163 and California Code of Regulations, title 22, section 66263.23.

14 70. Each act of unauthorized transportation that the People discovered within five (5)
15 years of commencing this action, in addition to any applicable tolling periods and those set forth
16 in paragraph 18 herein, and each day the waste was allowed to remain at such point without the
17 immediate filing of a report of the deposit with the DTSC, subjects Defendants to a separate and
18 additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

19 71. Based on the above, the People request injunctive relief against Defendants under
20 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
21 25189.2, subdivision (b), as described in the People's prayer for relief.

22 **SEVENTH CAUSE OF ACTION**

23 (Intentional Violations of Hazardous Waste Handling and Storage Requirements)
24 (Health & Safety Code Chapter 6.5 and Implementing Regulations §§ 25100, *et seq.*, and 25189,
25 subd. (b); Cal. Code Regs., Tit. 22, § 66260.1, *et seq.*)

26 72. Plaintiff realleges paragraphs 1 through 71, inclusive.

27 73. Defendants, and each of them, have intentionally violated and continue to violate
28 the hazardous waste handling and storage requirements of Chapter 6.5 of Division 20 of the
Health and Safety Code sections 25100, *et seq.*, and its implementing regulations at Title 22 of
the California Code of Regulations, sections 66260.1, *et seq.*, applicable to the California

1 Facilities by virtue of the acts alleged above, and incorporated herein by reference, and unless
2 enjoined by order of the Court, Defendants, and each of them, may or will continue in the course
3 of conduct as alleged herein.

4 74. Each intentional violation of the hazardous waste handling and storage
5 requirements that the People discovered within five (5) years of commencing this action, in
6 addition to any applicable tolling periods and those set forth in paragraph 18 herein, subjects
7 Defendants to a separate and additional civil penalty under Health and Safety Code section
8 25189, subdivision (b).

9 75. Based on the above, the People request injunctive relief against Defendants under
10 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
11 25189, subdivision (b), as described in the People's prayer for relief.

12 **EIGHTH CAUSE OF ACTION**

13 (Negligent Violations of Hazardous Waste Handling and Storage Requirements)
14 (Health & Safety Code Chapter 6.5 and Implementing Regulations §§ 25100, *et seq.*, and 25189,
15 subd. (b); Cal. Code Regs., Tit. 22, § 66260.1, *et seq.*)

16 76. Plaintiff realleges paragraphs 1 through 75, inclusive.

17 77. Defendants, and each of them, have negligently violated and continue to violate
18 the hazardous waste handling and storage requirements of Chapter 6.5 of Division 20 of the
19 Health and Safety Code sections 25100, *et seq.*, and its implementing regulations at Title 22 of
20 the California Code of Regulations, sections 66260.1, *et seq.*, applicable to the California
21 Facilities by virtue of the acts alleged above, and incorporated herein by reference, and unless
22 enjoined by order of the Court, Defendants, and each of them, may or will continue in the course
23 of conduct as alleged herein.

24 78. Each negligent violation of the hazardous waste handling and storage requirements
25 that the People discovered within five (5) years of commencing this action, in addition to any
26 applicable tolling periods and those set forth in paragraph 18 herein, subjects Defendants to a
27 separate and additional civil penalty under Health and Safety Code section 25189, subdivision
28 (b).

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1 periods and those set forth in paragraph 18 herein subjects Defendants to a separate and additional
2 civil penalty under Health and Safety Code section 118345, subdivision (b).

3 93. Based on the above, the People request injunctive relief against Defendants under
4 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section
5 118345, subdivision (b), as described in the People's prayer for relief.

6 **TWELFTH CAUSE OF ACTION**
7 (Disposal of Medical Waste at a Point Not Authorized)
8 (Health & Safety Code § 118000, subd. (b))

9 94. Plaintiff realleges paragraphs 1 through 93, inclusive.

10 95. Health and Safety Code section 118000, subdivision (b), prohibits the disposal of
11 medical waste at a point other than a permitted offsite medical waste treatment facility or a
12 permitted transfer station.

13 96. Defendants, and each of them, have disposed of medical waste originating from
14 the California Facilities at unauthorized points, in violation of California Health and Safety Code
15 section 118000, subdivision (b), and unless enjoined by order of the Court, Defendants, and each
16 of them, may or will continue in the course of conduct as alleged herein.

17 97. Each act of disposal of medical waste at an unauthorized point that the People
18 discovered within three (3) years of commencing this action, in addition to any applicable tolling
19 periods and those set forth in paragraph 18 herein subjects Defendants to a separate and additional
20 civil penalty under Health and Safety Code section 118345, subdivision (b).

21 98. Based on the above, the People request injunctive relief against Defendants under
22 Health and Safety Code section 118325, and civil penalties under Health and Safety Code section
23 118345, subdivision (b), as described in the People's prayer for relief.

24 **THIRTEENTH CAUSE OF ACTION**
25 (Unauthorized Transportation of Medical Waste)
26 (Health & Safety Code, §118000, subd. (a))

27 99. Plaintiff realleges paragraphs 1 through 98, inclusive.

28 100. Section 11800, subdivision (a) of the Health and Safety Code prohibits the
transportation of medical waste by other than a registered hazardous waste transporter.

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1 thereby constitute unfair competition within the meaning of Business and Professions Code
2 section 17200;

3 5. That the Defendants, herein be assessed a civil penalty of TWENTY-FIVE
4 THOUSAND DOLLARS (\$25,000.00), for each violation, in an amount according to proof, but
5 not less than TWENTY-FIVE MILLION DOLLARS (\$25,000,000.00) for their violations of
6 Health and Safety Code section 25189(c) or (b), or alternatively section 25189.2(c);

7 6. That the Defendants, herein be assessed a civil penalty of TWO THOUSAND
8 DOLLARS (\$2,000.00), for each violation, in an amount according to proof, but not less than
9 FIVE MILLION DOLLARS (\$5,000,000.00) for their violations of Health and Safety Code
10 sections 25514 and 25515.2;

11 7. That the Defendants, herein be assessed a civil penalty of TEN THOUSAND
12 DOLLARS (\$10,000.00), for each violation, in an amount according to proof, but not less than
13 FIVE MILLION DOLLARS (\$5,000,000.00) for their violations of Health and Safety Code
14 section 118345, subdivision (b);

15 8. That the Defendants, herein be assessed a civil penalty of TWO THOUSAND
16 FIVE HUNDRED DOLLARS (\$2,500.00), for each violation, in an amount according to proof,
17 but not less than FIVE MILLION DOLLARS (\$5,000,000.00) for their violations of Civil Code
18 section 56.36, subdivision (c)(1);

19 9. Civil penalties against That the Defendants, herein be assessed a civil penalty of
20 TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00), for each violation, in an amount
21 according to proof, but not less than TWENTY MILLION DOLLARS (\$20,000,000.00) for their
22 violations of Business and Professions Code section;

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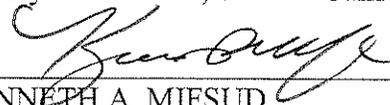
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10. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit herein; and,

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

Dated: 7-9-12

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

By: 
KENNETH A. MIFSUD
Senior Deputy District Attorney
People of the State of California

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EXHIBIT A

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
04050	1916 WEBSTER ST	ALAMEDA	ALAMEDA	94501
09248	2300 OTIS DR	ALAMEDA	ALAMEDA	94501
02314	1050 GILMAN ST	BERKELEY	ALAMEDA	94710
02609	2995 SAN PABLO AVE	BERKELEY	ALAMEDA	94702
03127	2187 SHATTUCK AVE	BERKELEY	ALAMEDA	94704
04614	2801 ADELINE ST	BERKELEY	ALAMEDA	94703
10045	2310 TELEGRAPH AVE	BERKELEY	ALAMEDA	94704
00101	3382 CASTRO VALLEY BLVD	CASTRO VALLEY	ALAMEDA	94546
02366	3860 DECOTO RD	FREMONT	ALAMEDA	94555
02660	41400 BLACOW RD	FREMONT	ALAMEDA	94538
04517	2600 MOWRY AVE	FREMONT	ALAMEDA	94538
06080	46844 MISSION BLVD	FREMONT	ALAMEDA	94539
02306	1138 W TENNYSON RD	HAYWARD	ALAMEDA	94544
02401	21463 FOOTHILL BLVD	HAYWARD	ALAMEDA	94541
04659	164 W JACKSON ST	HAYWARD	ALAMEDA	94544
05310	26781 MISSION BLVD	HAYWARD	ALAMEDA	94544
06502	23958 HESPERIAN BLVD	HAYWARD	ALAMEDA	94541
01535	301 E 18TH ST	OAKLAND	ALAMEDA	94606
01536	3434 HIGH ST	OAKLAND	ALAMEDA	94619
01537	3232 FOOTHILL BLVD	OAKLAND	ALAMEDA	94601
01625	5055 TELEGRAPH AVE	OAKLAND	ALAMEDA	94609
02393	1333 BROADWAY	OAKLAND	ALAMEDA	94612
13595	1333 BROADWAY	OAKLAND	ALAMEDA	94612
03165	10721 MACARTHUR BLVD	OAKLAND	ALAMEDA	94605
03170	3400 TELEGRAPH AVE	OAKLAND	ALAMEDA	94609
03295	8102 E 14TH ST OR	OAKLAND	ALAMEDA	94621
03295	8102 INTERNATIONAL BLVD	OAKLAND	ALAMEDA	94621
11706	301 E 18TH ST	OAKLAND	ALAMEDA	94606
02150	1763 SANTA RITA RD	PLEASANTON	ALAMEDA	94566
02426	15500 WASHINGTON AVE	SAN LEANDRO	ALAMEDA	94579
03032	15850 E 14TH ST	SAN LEANDRO	ALAMEDA	94578
07274	1456 136TH AVE	SAN LEANDRO	ALAMEDA	94578
12528	475 STATE HIGHWAY 49	SUTTER CREEK	AMADOR	95685
05207	1042 NORD AVE	CHICO	BUTTE	95926
12458	2507 ESPLANADE	CHICO	BUTTE	95926
02953	860 EAST AVE	CHICO	BUTTE	95926
13000	860 EAST AVE	CHICO	BUTTE	95926
06141	2703 ORO DAM BLVD E	OROVILLE	BUTTE	95966
03877	7576 SKYWAY	PARADISE	BUTTE	95969
04724	3416 DEER VALLEY RD	ANTIOCH	CONTRA COSTA	94531
13026	2700 WILLOW PASS RD	BAY POINT	CONTRA COSTA	94565
06871	4520 BALFOUR RD	BRENTWOOD	CONTRA COSTA	94513
09102	2271 BALFOUR RD	BRENTWOOD	CONTRA COSTA	94513
09978	6570 LONE TREE WAY	BRENTWOOD	CONTRA COSTA	94513
02112	5437 CLAYTON RD	CLAYTON	CONTRA COSTA	94517

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
03164	1800 CONCORD AVE	CONCORD	CONTRA COSTA	94520
02560	611 SAN RAMON VALLEY BLVD	DANVILLE	CONTRA COSTA	94526
12767	480 DIABLO RD	DANVILLE	CONTRA COSTA	94526
03770	11565 SAN PABLO AVE	EL CERRITO	CONTRA COSTA	94530
04049	3630 SAN PABLO DAM RD	EL SOBRANTE	CONTRA COSTA	94803
06101	3655 ALHAMBRA AVE	MARTINEZ	CONTRA COSTA	94553
11614	2750 PINOLE VALLEY RD	PINOLE	CONTRA COSTA	94564
07376	2901 RAILROAD AVE	PITTSBURG	CONTRA COSTA	94565
05864	721 GREGORY LN	PLEASANT HILL	CONTRA COSTA	94523
02506	1150 MACDONALD AVE	RICHMOND	CONTRA COSTA	94801
02435	13751 SAN PABLO AVE	SAN PABLO	CONTRA COSTA	94806
04491	15650 SAN PABLO AVE	SAN PABLO	CONTRA COSTA	94806
11861	2455 SAN PABLO DAM RD	SAN PABLO	CONTRA COSTA	94806
13796	14280 SAN PABLO AVE	SAN PABLO	CONTRA COSTA	94806
02485	21001 SAN RAMON VALLEY BLVD	SAN RAMON	CONTRA COSTA	94583
02464	2923 YGNACIO VALLEY RD	WALNUT CREEK	CONTRA COSTA	94598
04026	2900 N MAIN ST	WALNUT CREEK	CONTRA COSTA	94597
11754	787 L ST	CRESCENT CITY	DEL NORTE	95531
10599	4014 PLAZA GOLDORADO CIR	CAMERON PARK	EL DORADO	95682
12840	8230 SARATOGA WAY	EL DORADO HILLS	EL DORADO	95762
11823	4220 MISSOURI FLAT RD	PLACERVILLE	EL DORADO	95667
02864	1890 SHAW AVE	CLOVIS	FRESNO	93611
06387	1815 HERNDON AVE	CLOVIS	FRESNO	93611
07830	205 W SHAW AVE	CLOVIS	FRESNO	93612
10334	1790 SHAW AVE	CLOVIS	FRESNO	93611
10481	265 FORREST ST	COALINGA	FRESNO	93210
02702	1344 W CLINTON AVE	FRESNO	FRESNO	93705
02703	1219 N CEDAR AVE	FRESNO	FRESNO	93703
02727	5747 N PALM AVE	FRESNO	FRESNO	93704
03277	4172 N 1ST ST	FRESNO	FRESNO	93726
04907	2840 W ASHLAN AVE	FRESNO	FRESNO	93705
05847	610 E NEES AVE	FRESNO	FRESNO	93720
06082	626 S CLOVIS AVE	FRESNO	FRESNO	93727
06386	4810 E KINGS CANYON RD	FRESNO	FRESNO	93727
06942	6010 N FIGARDEN DR	FRESNO	FRESNO	93722
07204	7015 N WEST AVE	FRESNO	FRESNO	93711
07266	8975 N CHESTNUT AVE	FRESNO	FRESNO	93720
09655	6885 N WILLOW AVE	FRESNO	FRESNO	93710
09702	5785 N 1ST ST	FRESNO	FRESNO	93710
10243	2420 N BLACKSTONE AVE	FRESNO	FRESNO	93703
10335	2424 N BRAWLEY AVE	FRESNO	FRESNO	93722
12574	1219 N CEDAR AVE	FRESNO	FRESNO	93703
13871	1016 W SHAW AVE	FRESNO	FRESNO	93711
11877	4771 W ASHLAN AVE	FRESNO	FRESNO	93722
12707	4172 N 1ST ST	FRESNO	FRESNO	93726

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
12281	2950 N FOWLER WAY	FRESNO	FRESNO	93727
09815	988 SIERRA ST	KINGSBURG	FRESNO	93631
12298	852 E MANNING AVE	REEDLEY	FRESNO	93654
12282	2589 JENSEN AVE	SANGER	FRESNO	93657
12337	2795 FLORAL AVE	SELMA	FRESNO	93662
13001	828 NEWVILLE RD	ORLAND	GLENN	95963
04681	1424 BROADWAY ST	EUREKA	HUMBOLDT	95501
05863	2525 HARRIS ST	EUREKA	HUMBOLDT	95503
09703	1065 S FORTUNA BLVD	FORTUNA	HUMBOLDT	95540
06856	100 N IMPERIAL AVE	EL CENTRO	IMPERIAL	92243
01816	3301 PANAMA LN	BAKERSFIELD	KERN	93313
03222	40 CHESTER AVE	BAKERSFIELD	KERN	93301
03272	3315 S H ST	BAKERSFIELD	KERN	93304
03282	3815 NILES ST	BAKERSFIELD	KERN	93306
03294	2628 MOUNT VERNON AVE	BAKERSFIELD	KERN	93306
03360	4100 WHITE LN	BAKERSFIELD	KERN	93309
06526	9550 HAGEMAN RD	BAKERSFIELD	KERN	93312
06756	4306 MING AVE	BAKERSFIELD	KERN	93309
07909	4949 GOSFORD RD	BAKERSFIELD	KERN	93313
11532	3300 BUENA VISTA RD. BLDG A	BAKERSFIELD	KERN	93311
10827	1435 HIGH ST	DELANO	KERN	93215
09030	101 DRUMMOND AVE	RIDGECREST	KERN	93555
07555	1101 W TEHACHAPI BLVD	TEHACHAPI	KERN	93561
05411	710 W GRANGEVILLE BLVD	HANFORD	KINGS	93230
11612	12 W HANFORD ARMONA RD	LEMOORE	KINGS	93245
10421	2875 MAIN ST	SUSANVILLE	LASSEN	96130
02156	2551 W MAIN ST	ALHAMBRA	LOS ANGELES	91801
04127	5 LIVE OAK AVE	ARCADIA	LOS ANGELES	91007
07035	140 E LIVE OAK AVE	ARCADIA	LOS ANGELES	91006
09050	253 E FOOTHILL BLVD	ARCADIA	LOS ANGELES	91006
06124	9750 WOODMAN AVE	ARLETA	LOS ANGELES	91331
05773	11800 ARTESIA BLVD	ARTESIA	LOS ANGELES	90701
07654	14102 RAMONA BLVD	BALDWIN PARK	LOS ANGELES	91706
09640	14101 FRANCISQUITO AVE	BALDWIN PARK	LOS ANGELES	91706
06680	9031 ROSECRANS AVE	BELLFLOWER	LOS ANGELES	90706
07403	15740 WOODRUFF AVE	BELLFLOWER	LOS ANGELES	90706
04474	2501 W MAGNOLIA BLVD	BURBANK	LOS ANGELES	91505
06250	1028 S SAN FERNANDO BLVD	BURBANK	LOS ANGELES	91502
10040	1022 N LAKE ST	BURBANK	LOS ANGELES	91502
05743	7560 TOPANGA CANYON RD	CANOGA PARK	LOS ANGELES	91303
05848	20505 SHERMAN WAY	CANOGA PARK	LOS ANGELES	91306
07529	27983 SLOAN CANYON RD	CASTAIC	LOS ANGELES	91384
07015	20901 DEVONSHIRE ST	CHATSWORTH	LOS ANGELES	91311
05798	401 N AZUSA AVE	COVINA	LOS ANGELES	91722
06972	150 S GRAND AVE	COVINA	LOS ANGELES	91724

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
03902	7966 FLORENCE AVE	DOWNEY	LOS ANGELES	90240
10112	9018 FIRESTONE BLVD	DOWNEY	LOS ANGELES	90241
09842	8030 IMPERIAL HWY	DOWNEY	LOS ANGELES	90242
07575	3643 PECK RD	EL MONTE	LOS ANGELES	91731
07598	11907 VALLEY BLVD	EL MONTE	LOS ANGELES	91732
09882	331 N SEPULVEDA BLVD	EL SEGUNDO	LOS ANGELES	90245
11735	16100 VENTURA BLVD	ENCINO	LOS ANGELES	91436
07175	1344 W REDONDO BEACH BLVD	GARDENA	LOS ANGELES	90247
06640	550 S GRAND AVE	GLENDORA	LOS ANGELES	91741
05566	17010 CHATSWORTH ST	GRANADA HILLS	LOS ANGELES	91344
05591	24930 WESTERN AVE	HARBOR CITY	LOS ANGELES	90710
09137	14250 PRAIRIE AVE	HAWTHORNE	LOS ANGELES	90250
10069	11983 HAWTHORNE BLVD	HAWTHORNE	LOS ANGELES	90250
11785	6100 PACIFIC BLVD	HUNTINGTON PARK	LOS ANGELES	90255
06413	230 N LA BREA AVE	INGLEWOOD	LOS ANGELES	90301
06974	3331 W CENTURY BLVD	INGLEWOOD	LOS ANGELES	90303
01606	3001 FOOTHILL BLVD	LA CRESCENTA	LOS ANGELES	91214
04364	14210 IMPERIAL HWY	LA MIRADA	LOS ANGELES	90638
05702	934 N HACIENDA BLVD	LA PUENTE	LOS ANGELES	91744
05616	5913 CARSON ST	LAKEWOOD	LOS ANGELES	90713
06903	5829 LAKEWOOD BLVD	LAKEWOOD	LOS ANGELES	90712
06017	2840 W AVENUE L	LANCASTER	LOS ANGELES	93536
06018	831 E AVENUE K	LANCASTER	LOS ANGELES	93535
10692	1834 W AVENUE J	LANCASTER	LOS ANGELES	93534
07343	5001 W AVENUE N	LANCASTER	LOS ANGELES	93536
05650	2627 PACIFIC AVE	LONG BEACH	LOS ANGELES	90806
07244	3570 ATLANTIC AVE	LONG BEACH	LOS ANGELES	90807
07832	3339 E ANAHEIM ST	LONG BEACH	LOS ANGELES	90804
07870	600 LONG BEACH BLVD	LONG BEACH	LOS ANGELES	90802
11082	5400 CHERRY AVE	LONG BEACH	LOS ANGELES	90805
11439	6310 PACIFIC COAST HWY	LONG BEACH	LOS ANGELES	90803
05879	3201 W 6TH ST	LOS ANGELES	LOS ANGELES	90020
06445	8770 W PICO BLVD	LOS ANGELES	LOS ANGELES	90035
06516	5467 WILSHIRE BLVD	LOS ANGELES	LOS ANGELES	90036
06854	2222 COLORADO BLVD	LOS ANGELES	LOS ANGELES	90041
06931	10407 SANTA MONICA BLVD	LOS ANGELES	LOS ANGELES	90025
07016	3724 CRENSHAW BLVD	LOS ANGELES	LOS ANGELES	90016
07036	5451 W SUNSET BLVD	LOS ANGELES	LOS ANGELES	90027
07482	1800 W SLAUSON AVE	LOS ANGELES	LOS ANGELES	90047
09136	1625 W SUNSET BLVD	LOS ANGELES	LOS ANGELES	90026
09285	5843 W PICO BLVD	LOS ANGELES	LOS ANGELES	90019
11449	4616 DE LONGPRE AVE	LOS ANGELES	LOS ANGELES	90027
12913	1500 E GAGE AVE	LOS ANGELES	LOS ANGELES	90001
12057	1050 N HIGHLAND AVE	LOS ANGELES	LOS ANGELES	90016
12460	617 W 7TH ST	LOS ANGELES	LOS ANGELES	90017

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
12419	11795 W OLYMPIC BLVD	LOS ANGELES	LOS ANGELES	90064
06249	4351 E IMPERIAL HWY	LYNWOOD	LOS ANGELES	90262
9685	2400 N SEPULVEDA BLVD	MANHATTAN BEACH	LOS ANGELES	90266
07070	4009 LINCOLN BLVD	MARINA DEL REY	LOS ANGELES	90292
04227	903 E HUNTINGTON DR	MONROVIA	LOS ANGELES	91016
11473	490 W HUNTINGTON DR	MONROVIA	LOS ANGELES	91016
02155	1501 W WHITTIER BLVD	MONTEBELLO	LOS ANGELES	90640
11440	2331 S ATLANTIC BLVD	MONTEREY PARK	LOS ANGELES	91754
07950	15316 NORDHOFF ST	NORTH HILLS	LOS ANGELES	91343
09491	10995 MAGNOLIA BLVD	NORTH HOLLYWOOD	LOS ANGELES	91601
06347	18515 DEVONSHIRE ST	NORTHRIDGE	LOS ANGELES	91324
03937	10968 ROSECRANS AVE	NORWALK	LOS ANGELES	90650
11243	11930 STUDEBAKER RD	NORWALK	LOS ANGELES	90650
06976	37160 47TH ST E	PALMDALE	LOS ANGELES	93552
09139	670 N LAKE AVE	PASADENA	LOS ANGELES	91101
11442	310 S LAKE ST	PASADENA	LOS ANGELES	91101
10764	2376 E COLORADO BLVD	PASADENA	LOS ANGELES	91107
07263	8900 WASHINGTON BLVD	PICO RIVERA	LOS ANGELES	90660
04382	795 E FOOTHILL BLVD	POMONA	LOS ANGELES	91767
07230	495 E HOLT AVE	POMONA	LOS ANGELES	91767
06904	535 S PACIFIC COAST HWY	REDONDO BEACH	LOS ANGELES	90277
06496	2321 HAWTHORNE BLVD	REDONDO BEACH	LOS ANGELES	90278
06648	18430 SHERMAN WAY	RESEDA	LOS ANGELES	91335
09029	6416 TAMPA BLVD	RESEDA	LOS ANGELES	91335
07912	2750 SAN GABRIEL BLVD	ROSEMEAD	LOS ANGELES	91770
04076	18308 COLIMA RD	ROWLAND HEIGHTS	LOS ANGELES	91748
09845	18308 COLIMA RD	ROWLAND HEIGHTS	LOS ANGELES	91748
05797	1086 W ARROW HWY	SAN DIMAS	LOS ANGELES	91773
06125	6325 ROSEMEAD BLVD	SAN GABRIEL	LOS ANGELES	91775
06930	19266 SOLEDAD CANYON RD	SANTA CLARITA	LOS ANGELES	91351
07556	28460 HASKELL CANYON RD	SANTA CLARITA	LOS ANGELES	91390
10767	23925 NEWHALL RANCH RD	SANTA CLARITA	LOS ANGELES	91355
12023	24790 VALLEY ST	SANTA CLARITA	LOS ANGELES	91321
05526	1932 WILSHIRE BLVD	SANTA MONICA	LOS ANGELES	90403
07556	28460 HASKELL CANYON RD	SAUGUS	LOS ANGELES	91390
15293	4940 VAN NUYS BLVD, STE 104	SHERMAN OAKS	LOS ANGELES	91403
10262	9830 LONG BEACH BLVD	SOUTH GATE	LOS ANGELES	90280
01813	18568 VENTURA BLVD	TARZANA	LOS ANGELES	91356
02622	4142 PACIFIC COAST HWY	TORRANCE	LOS ANGELES	90505
05772	2690 PACIFIC COAST HWY	TORRANCE	LOS ANGELES	90505
06251	2976 SEPULVEDA BLVD	TORRANCE	LOS ANGELES	90505
07481	22930 S WESTERN AVE	TORRANCE	LOS ANGELES	90501
05525	7155 VAN NUYS BLVD	VAN NUYS	LOS ANGELES	91405
06700	5224 COLDWATER CANYON AVE	VAN NUYS	LOS ANGELES	91401
07826	13231 VICTORY BLVD	VAN NUYS	LOS ANGELES	91401

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
09560	2453 S AZUSA AVE	WEST COVINA	LOS ANGELES	91792
09656	1131 S GLENDORA AVE	WEST COVINA	LOS ANGELES	91790
15294	8490 SANTA MONICA BLVD STE 1	WEST HOLLYWOOD	LOS ANGELES*	90069
05649	8201 GREENLEAF AVE	WHITTIER	LOS ANGELES	90602
07211	11604 WHITTIER BLVD	WHITTIER	LOS ANGELES	90601
09468	13331 TELEGRAPH RD	WHITTIER	LOS ANGELES	90605
06453	1300 W YOSEMITE AVE	MADERA	MADERA	93637
11242	2020 W CLEVELAND AVE	MADERA	MADERA	93637
12761	41169 GOODWIN WAY, SUITE 110	MADERA	MADERA	93636
04559	227 SHORELINE HWY	MILL VALLEY	MARIN	94941
07445	820 SIR FRANCIS DRAKE RD	SAN ANSELMO	MARIN	94960
04625	830 3RD ST	SAN RAFAEL	MARIN	94901
13584	155 NORTHGATE ONE	SAN RAFAEL	MARIN	94903
09525	308 E PERKINS ST	UKIAH	MENDOCINO	95482
06718	2730 SHAPPER RD	ATWATER	MERCED	95301
06418	1360 E PACHECO BLVD	LOS BANOS	MERCED	93635
03330	1640 R ST	MERCED	MERCED	95340
04415	3098 G ST	MERCED	MERCED	95340
04997	226 RESERVATION RD	MARINA	MONTEREY	93933
07081	416 ALVARADO ST	MONTEREY	MONTEREY	93940
02606	1532 N MAIN ST	SALINAS	MONTEREY	93906
03446	575 N SANBORN RD	SALINAS	MONTEREY	93905
02867	1055 FREMONT BLVD	SEASIDE	MONTEREY	93955
11365	210 AMERICAN CANYON RD	AMERICAN CANYON	NAPA	94503
11822	1685 TRANCAS ST	NAPA	NAPA	94558
10881	880 SUTTON WAY	GRASS VALLEY	NEVADA	95945
11241	26531 ALISO CREEK RD	ALISO VIEJO	ORANGE	92656
05744	128 S STATE COLLEGE BLVD	ANAHEIM	ORANGE	92806
06157	946 S BROOKHURST ST	ANAHEIM	ORANGE	92804
06726	1720 W LA PALMA AVE	ANAHEIM	ORANGE	92801
06954	3446 W BALL RD	ANAHEIM	ORANGE	92804
09388	10840 KATELLA AVE	ANAHEIM	ORANGE	92804
10629	2560 W BALL RD	ANAHEIM	ORANGE	92804
07679	7878 CRESCENT AVE	BUENA PARK	ORANGE	90620
07629	5005 BALL RD	CYPRESS	ORANGE	90630
10200	6006 LINCOLN AVE	CYPRESS	ORANGE	90630
03561	16225 HARBOR BLVD	FOUNTAIN VALLEY	ORANGE	92708
09534	15990 BROOKHURST ST	FOUNTAIN VALLEY	ORANGE	92708
12573	16201 HARBOR BLVD	FOUNTAIN VALLEY	ORANGE	92708
12694	10990 WARNER AVE SUITE A	FOUNTAIN VALLEY	ORANGE	92708
01750	1250 E CHAPMAN AVE	FULLERTON	ORANGE	92831
06215	1826 W ORANGETHORPE AVE	FULLERTON	ORANGE	92833
03674	12002 HARBOR BLVD	GARDEN GROVE	ORANGE	92840
05972	12001 EUCLID ST	GARDEN GROVE	ORANGE	92840
06187	11950 VALLEY VIEW ST	GARDEN GROVE	ORANGE	92845

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
04354	6012 WARNER AVE	HUNTINGTON BEACH	ORANGE	92647
04576	9500 GARFIELD AVE	HUNTINGTON BEACH	ORANGE	92646
05771	17522 BEACH BLVD	HUNTINGTON BEACH	ORANGE	92647
05881	19501 BEACH BLVD	HUNTINGTON BEACH	ORANGE	92648
09089	19001 BROOKHURST ST	HUNTINGTON BEACH	ORANGE	92646
12140	4935 WARNER AVE	HUNTINGTON BEACH	ORANGE	92649
09883	6316 IRVINE BLVD	IRVINE	ORANGE	92620
11786	5695 ALTON PKWY	IRVINE	ORANGE	92618
03747	101 W IMPERIAL HWY	LA HABRA	ORANGE	90631
05672	2000 W WHITTIER BLVD	LA HABRA	ORANGE	90631
04270	5510 LA PALMA AVE	LA PALMA	ORANGE	90623
10630	5961 LA PALMA AVE	LA PALMA	ORANGE	90623
04207	24081 EL TORO RD	LAGUNA HILLS	ORANGE	92653
06975	27982 LA PAZ RD	LAGUNA NIGUEL	ORANGE	92677
10852	30192 TOWN CENTER DR	LAGUNA NIGUEL	ORANGE	92677
03936	24382 MUIRLANDS BLVD	LAKE FOREST	ORANGE	92630
12682	22477 EL TORO RD	LAKE FOREST	ORANGE	92630
01232	27785 SANTA MARGARITA PKWY	MISSION VIEJO	ORANGE	92691
09843	25533 MARGUERITE PKWY	MISSION VIEJO	ORANGE	92692
03636	3237 E CHAPMAN AVE	ORANGE	ORANGE	92869
03815	111 S MAIN ST	ORANGE	ORANGE	92868
10336	1538 E CHAPMAN AVE	ORANGE	ORANGE	92866
03560	1201 E YORBA LINDA BLVD	PLACENTIA	ORANGE	92870
09197	191 E YORBA LINDA BLVD	PLACENTIA	ORANGE	92870
12916	30592 SANTA MARGARITA PKWY, SUITE D	MARGARITA	ORANGE	92688
03588	3000 S BRISTOL ST	SANTA ANA	ORANGE	92704
06388	1301 E 17TH ST	SANTA ANA	ORANGE	92705
10397	1715 N BRISTOL ST	SANTA ANA	ORANGE	92706
06446	11900 BEACH BLVD	STANTON	ORANGE	90680
07286	13052 NEWPORT AVE	TUSTIN	ORANGE	92780
02162	8052 WESTMINSTER BLVD	WESTMINSTER	ORANGE	92683
09533	7001 WESTMINSTER BLVD	WESTMINSTER	ORANGE	92683
02170	12120 NEW AIRPORT RD	AUBURN	PLACER	95603
06036	4051 DOUGLAS BLVD	GRANITE BAY	PLACER	95746
12525	700 TWELVE BRIDGES DR	LINCOLN	PLACER	95648
06915	2177 SUNSET BLVD	ROCKLIN	PLACER	95765
05501	3999 FOOTHILLS BLVD	ROSEVILLE	PLACER	95747
05182	60 N HIGHLAND SPRINGS AVE	BANNING	RIVERSIDE	92220
07714	1400 BEAUMONT AVE	BEAUMONT	RIVERSIDE	92223
04757	42010 WASHINGTON ST	BERMUDA DUNES	RIVERSIDE	92203
10366	1186 CALIMESA BLVD	CALIMESA	RIVERSIDE	92320
05301	33975 DATE PALM DR	CATHEDRAL CITY	RIVERSIDE	92234
09229	30015 DATE PALM DR	CATHEDRAL CITY	RIVERSIDE	92234
13436	67802 E PALM CANYON DR	CATHEDRAL CITY	RIVERSIDE	92234
11611	50040 HARRISON ST	COACHELLA	RIVERSIDE	92236

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
05183	1107 W 6TH ST	CORONA	RIVERSIDE	92882
07303	100 W ONTARIO AVE	CORONA	RIVERSIDE	92882
07591	120 W PARKRIDGE AVE	CORONA	RIVERSIDE	92880
10042	2045 CALIFORNIA AVE STE 114	CORONA	RIVERSIDE	92881
05037	14001 PALM DR	DESERT HOT SPRINGS	RIVERSIDE	92240
13657	12574 LIMONITE AVE	EASTVALE	RIVERSIDE	91752
01080	43200 STATE HIGHWAY 74	HEMET	RIVERSIDE	92544
01081	1101 S SANDERSON AVE	HEMET	RIVERSIDE	92545
05038	1661 W FLORIDA AVE	HEMET	RIVERSIDE	92543
05349	1311 E FLORIDA AVE	HEMET	RIVERSIDE	92544
01254	44100 JEFFERSON ST	INDIO	RIVERSIDE	92201
09080	80925 HIGHWAY 111	INDIO	RIVERSIDE	92201
09781	82955 AVENUE 48, BLDG B	INDIO	RIVERSIDE	92201
10703	82900 AVENUE 42	INDIO	RIVERSIDE	92203
07765	47900 WASHINGTON ST	LA QUINTA	RIVERSIDE	92253
09486	18296 COLLIER AVE	LAKE ELSINORE	RIVERSIDE	92530
13813	160 DIAMOND DR	LAKE ELSINORE	RIVERSIDE	92530
06127	30251 MURRIETA RD	MENIFEE	RIVERSIDE	92584
05220	12275 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	92557
05527	25011 ALESSANDRO BLVD	MORENO VALLEY	RIVERSIDE	92553
09616	16020 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	92551
DC	17500 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	92551
01995	40420 MURRIETA HOT SPRINGS RD	MURRIETA	RIVERSIDE	92563
07410	STE A	MURRIETA	RIVERSIDE	92563
09884	40663 CALIFORNIA OAKS RD	MURRIETA	RIVERSIDE	92562
11475	27714 CLINTON KEITH RD	MURRIETA	RIVERSIDE	92562
10948	33060 ANTELOPE RD	MURRIETA	RIVERSIDE	92563
10060	475 HIDDEN VALLEY PKWY	NORCO	RIVERSIDE	92860
04756	44840 MONTEREY AVE	PALM DESERT	RIVERSIDE	92260
10242	78218 VARNER RD	PALM DESERT	RIVERSIDE	92211
01079	1700 E VISTA CHINO	PALM SPRINGS	RIVERSIDE	92262
07577	1695 N SUNRISE WAY	PALM SPRINGS	RIVERSIDE	92262
09885	2465 E PALM CANYON DR	PALM SPRINGS	RIVERSIDE	92264
13435	555 S SUNRISE WAY STES 112-113	PALM SPRINGS	RIVERSIDE	92264
15094	2055 N PERRIS BLVD	PERRIS	RIVERSIDE	92571
09641	72027 DINAH SHORE DR	RANCHO MIRAGE	RIVERSIDE	92270
02712	8044 LIMONITE AVE	RIVERSIDE	RIVERSIDE	92509
04352	11110 MAGNOLIA AVE	RIVERSIDE	RIVERSIDE	92505
07262	6600 MAGNOLIA AVE	RIVERSIDE	RIVERSIDE	92506
07786	8917 TRAUTWEIN RD	RIVERSIDE	RIVERSIDE	92508
07991	6444 VAN BUREN BLVD	RIVERSIDE	RIVERSIDE	92503
13833	10992 MAGNOLIA AVE	RIVERSIDE	RIVERSIDE	92505
07990	1745 UNIVERSITY AVE	RIVERSIDE	RIVERSIDE	92507
09021	1811 S SAN JACINTO AVE	SAN JACINTO	RIVERSIDE	92583

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
10172	1181 N STATE ST	SAN JACINTO	RIVERSIDE	92583
10368	2261 W ESPLANADE AVE	SAN JACINTO	RIVERSIDE	92582
06126	27975 BRADLEY RD	SUN CITY	RIVERSIDE	92586
06658	6325 FAIR OAKS BLVD	CARMICHAEL	SACRAMENTO	95608
05152	6144 DEWEY DR	CITRUS HEIGHTS	SACRAMENTO	95621
05774	7787 SUNRISE BLVD	CITRUS HEIGHTS	SACRAMENTO	95610
07191	6199 SUNRISE BLVD	CITRUS HEIGHTS	SACRAMENTO	95610
05499	7299 LAGUNA BLVD	ELK GROVE	SACRAMENTO	95758
06142	9200 ELK GROVE FLORIN RD	ELK GROVE	SACRAMENTO	95624
06419	9180 FRANKLIN BLVD	ELK GROVE	SACRAMENTO	95758
06612	8400 ELK GROVE FLORIN RD	ELK GROVE	SACRAMENTO	95624
06417	1100 RILEY ST	FOLSOM	SACRAMENTO	95630
09048	2595 E BIDWELL ST	FOLSOM	SACRAMENTO	95630
10693	6819 WATT AVE	NORTH HIGHLANDS	SACRAMENTO	95660
04414	8900 GREENBACK LN	ORANGEVALE	SACRAMENTO	95662
09532	4050 SUNRISE BLVD	RANCHO CORDOVA	SACRAMENTO	95742
04136	1919 FRUITRIDGE RD	SACRAMENTO	SACRAMENTO	95822
04170	4200 ARDEN WAY	SACRAMENTO	SACRAMENTO	95864
05036	4495 MACK RD	SACRAMENTO	SACRAMENTO	95823
05374	2900 STOCKTON BLVD	SACRAMENTO	SACRAMENTO	95817
05500	4331 ANTELOPE RD	SACRAMENTO	SACRAMENTO	95843
06193	2201 ARDEN WAY	SACRAMENTO	SACRAMENTO	95825
06613	1401 BROADWAY	SACRAMENTO	SACRAMENTO	95818
06706	7155 24TH ST	SACRAMENTO	SACRAMENTO	95822
06807	5020 MADISON AVE	SACRAMENTO	SACRAMENTO	95841
10114	3521 DEL PASO BLVD	SACRAMENTO	SACRAMENTO	95838
10716	250 FLORIN RD	SACRAMENTO	SACRAMENTO	95831
12365	8275 BRUCEVILLE RD	SACRAMENTO	SACRAMENTO	95823
11262	840 EL CAMINO AVE	SACRAMENTO	SACRAMENTO	95815
13597	1420 MEADOWVIEW RD	SACRAMENTO	SACRAMENTO	95832
01870	12109 APPLE VALLEY RD	APPLE VALLEY	SAN BERNARDINO	92308
07948	20250 HIGHWAY 18	APPLE VALLEY	SAN BERNARDINO	92307
12332	21650 US HIGHWAY 18	APPLE VALLEY	SAN BERNARDINO	92307
10420	42107 BIG BEAR BLVD	BIG BEAR LAKE	SAN BERNARDINO	92315
06438	12490 CENTRAL AVE	CHINO	SAN BERNARDINO	91710
11472	3320 CHINO HILLS PKWY	CHINO HILLS	SAN BERNARDINO	91709
05372	16108 FOOTHILL BLVD	FONTANA	SAN BERNARDINO	92335
09588	16145 SIERRA LAKES PKWY	FONTANA	SAN BERNARDINO	92336
10768	11121 SIERRA AVE	FONTANA	SAN BERNARDINO	92337
02223	17383 MAIN ST	HESPERIA	SAN BERNARDINO	92345
05556	17051 BEAR VALLEY RD	HESPERIA	SAN BERNARDINO	92345
09780	15480 MAIN ST	HESPERIA	SAN BERNARDINO	92345
05300	27951 BASELINE ST	HIGHLAND	SAN BERNARDINO	92346
06147	2950 S ARCHIBALD AVE	ONTARIO	SAN BERNARDINO	91761

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
10202	2245 S EUCLID AVE	ONTARIO	SAN BERNARDINO	91762
05478	6701 CARNELIAN ST	RANCHO CUCAMONGA	SAN BERNARDINO	91701
05652	6400 HAVEN AVE	RANCHO CUCAMONGA	SAN BERNARDINO	91737
07976	800 LUGONIA AVE	REDLANDS	SAN BERNARDINO	92374
05506	118 E BASE LINE RD	RIALTO	SAN BERNARDINO	92376
05555	550 S RIVERSIDE AVE	RIALTO	SAN BERNARDINO	92376
09105	1280 W FOOTHILL BLVD	RIALTO	SAN BERNARDINO	92376
12547	2011 N RIVERSIDE AVE	RIALTO	SAN BERNARDINO	92377
05528	4041 N SIERRA WAY	SAN BERNARDINO	SAN BERNARDINO	92407
06685	1634 E HIGHLAND AVE	SAN BERNARDINO	SAN BERNARDINO	92404
09183	1301 W BASELINE ST	SAN BERNARDINO	SAN BERNARDINO	92411
10467	1236 N WATERMAN AVE	SAN BERNARDINO	SAN BERNARDINO	92404
06061	1241 W FOOTHILL BLVD	UPLAND	SAN BERNARDINO	91786
09254	13655 BEAR VALLEY RD	VICTORVILLE	SAN BERNARDINO	92392
12576	15318 ROY ROGERS DR	VICTORVILLE	SAN BERNARDINO	92394
05348	34503 YUCAIPA BLVD	YUCAIPA	SAN BERNARDINO	92399
06399	58133 29 PALMS HWY	YUCCA VALLEY	SAN BERNARDINO	92284
02623	1111 3RD AVE	CHULA VISTA	SAN DIEGO	91911
06255	6211 1 ST	CHULA VISTA	SAN DIEGO	91910
07867	1430 EASTLAKE PKWY	CHULA VISTA	SAN DIEGO	91915
05844	215 N 2ND ST	EL CAJON	SAN DIEGO	92021
11653	1320 ENCINITAS BLVD	ENCINITAS	SAN DIEGO	92024
05455	111 WASHINGTON AVE	ESCONDIDO	SAN DIEGO	92025
05700	1574 E VALLEY PKWY	ESCONDIDO	SAN DIEGO	92027
10142	460 W FELICITA AVE	ESCONDIDO	SAN DIEGO	92025
11081	1285 S MISSION RD	FALLBROOK	SAN DIEGO	92028
11990	9728 WINTER GARDENS BLVD	LAKESIDE	SAN DIEGO	92040
07869	885 EUCLID AVE	NATIONAL CITY	SAN DIEGO	91950
07751	3507 CANNON RD	OCEANSIDE	SAN DIEGO	92056
09433	3752 MISSION AVE	OCEANSIDE	SAN DIEGO	92058
13052	4181 OCEANSIDE BLVD	OCEANSIDE	SAN DIEGO	92056
12421	13390 POWAY RD	POWAY	SAN DIEGO	92064
06094	3005 MIDWAY DR	SAN DIEGO	SAN DIEGO	92110
06656	3222 UNIVERSITY AVE	SAN DIEGO	SAN DIEGO	92104
07176	8766 NAVAJO RD	SAN DIEGO	SAN DIEGO	92119
11654	10787 CAMINO RUIZ	SAN DIEGO	SAN DIEGO	92126
12143	5504 BALBOA AVE	SAN DIEGO	SAN DIEGO	92111
15295	3900 5TH AVE STE 110	SAN DIEGO	SAN DIEGO	92103
13434	640 UNIVERSITY AVENUE	SAN DIEGO	SAN DIEGO	92103
13161	4029 43RD ST., STE 700	SAN DIEGO	SAN DIEGO	92105
09817	9305 MISSION GORGE RD	SANTEE	SAN DIEGO	92071
11406	10512 MISSION GORGE RD	SANTEE	SAN DIEGO	92071
05456	1510 N SANTA FE AVE	VISTA	SAN DIEGO	92083
06222	802 S SANTA FE AVE	VISTA	SAN DIEGO	92084
09389	310 SYCAMORE AVE	VISTA	SAN DIEGO	92083

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
00886	2125 CHESTNUT ST	SAN FRANCISCO	SAN FRANCISCO	94123
00887	1524 POLK ST	SAN FRANCISCO	SAN FRANCISCO	94109
00890	135 POWELL ST	SAN FRANCISCO	SAN FRANCISCO	94102
00893	1344 STOCKTON ST	SAN FRANCISCO	SAN FRANCISCO	94133
00896	3601 CALIFORNIA ST	SAN FRANCISCO	SAN FRANCISCO	94118
00903	5411 GEARY BLVD	SAN FRANCISCO	SAN FRANCISCO	94121
01054	3398 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94110
01109	5260 DIAMOND HEIGHTS BLVD	SAN FRANCISCO	SAN FRANCISCO	94131
01120	4645 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94112
01126	1979 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94103
01241	1201 TARAVAL ST	SAN FRANCISCO	SAN FRANCISCO	94116
01283	500 GEARY ST	SAN FRANCISCO	SAN FRANCISCO	94102
01297	670 4TH ST	SAN FRANCISCO	SAN FRANCISCO	94107
01307	499 HAIGHT ST	SAN FRANCISCO	SAN FRANCISCO	94117
01327	498 CASTRO ST	SAN FRANCISCO	SAN FRANCISCO	94114
01393	1630 OCEAN AVE	SAN FRANCISCO	SAN FRANCISCO	94112
01403	3201 DIVISADERO ST	SAN FRANCISCO	SAN FRANCISCO	94123
01626	2494 SAN BRUNO AVE	SAN FRANCISCO	SAN FRANCISCO	94134
02005	2550 OCEAN AVE	SAN FRANCISCO	SAN FRANCISCO	94132
02088	1333 CASTRO ST	SAN FRANCISCO	SAN FRANCISCO	94114
02125	320 BAY ST	SAN FRANCISCO	SAN FRANCISCO	94133
02152	1899 FILLMORE ST	SAN FRANCISCO	SAN FRANCISCO	94115
02153	790 VAN NESS AVE	SAN FRANCISCO	SAN FRANCISCO	94102
02244	3801 3RD ST STE 550	SAN FRANCISCO	SAN FRANCISCO	94124
02521	300 MONTGOMERY ST	SAN FRANCISCO	SAN FRANCISCO	94104
02705	2050 IRVING ST	SAN FRANCISCO	SAN FRANCISCO	94122
02866	1363 DIVISADERO ST	SAN FRANCISCO	SAN FRANCISCO	94115
03185	825 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94103
03358	1301 FRANKLIN ST	SAN FRANCISCO	SAN FRANCISCO	94109
03383	141 KEARNY ST	SAN FRANCISCO	SAN FRANCISCO	94108
03475	25 POINT LOBOS AVE	SAN FRANCISCO	SAN FRANCISCO	94121
03624	290 FRONT ST	SAN FRANCISCO	SAN FRANCISCO	94111
03624	275 SACRAMENTO ST	SAN FRANCISCO	SAN FRANCISCO	94111
03706	3838 CALIFORNIA ST	SAN FRANCISCO	SAN FRANCISCO	94118
03707	2100 WEBSTER ST Rm 105	SAN FRANCISCO	SAN FRANCISCO	94115
03711	1189 POTRERO AVE	SAN FRANCISCO	SAN FRANCISCO	94110
03849	745 CLEMENT ST	SAN FRANCISCO	SAN FRANCISCO	94118
03869	1750 NORIEGA ST	SAN FRANCISCO	SAN FRANCISCO	94122
04180	689 PORTOLA DR	SAN FRANCISCO	SAN FRANCISCO	94127
04231	2690 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94110
04264	2 W PORTAL AVE	SAN FRANCISCO	SAN FRANCISCO	94127
04275	456 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94105
04318	4129 18TH ST	SAN FRANCISCO	SAN FRANCISCO	94114
04492	33 DRUMM ST	SAN FRANCISCO	SAN FRANCISCO	94111
04529	2145 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94114

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
04558	300 GOUGH ST	SAN FRANCISCO	SAN FRANCISCO	94102
04570	3001 TARAVAL ST	SAN FRANCISCO	SAN FRANCISCO	94116
04609	1301 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94103
04680	730 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94102
05487	5300 3RD ST	SAN FRANCISCO	SAN FRANCISCO	94124
05599	2120 POLK ST	SAN FRANCISCO	SAN FRANCISCO	94109
05618	100 SANSOME ST	SAN FRANCISCO	SAN FRANCISCO	94104
05815	2801 JONES ST	SAN FRANCISCO	SAN FRANCISCO	94133
06291	116 NEW MONTGOMERY ST	SAN FRANCISCO	SAN FRANCISCO	94105
06557	199 PARNASSUS AVE	SAN FRANCISCO	SAN FRANCISCO	94117
06625	2141 CHESTNUT ST	SAN FRANCISCO	SAN FRANCISCO	94123
07043	459 POWELL ST	SAN FRANCISCO	SAN FRANCISCO	94102
07044	88 SPEAR ST	SAN FRANCISCO	SAN FRANCISCO	94105
07150	965 GENEVA AVE	SAN FRANCISCO	SAN FRANCISCO	94112
13666	1300 BUSH ST	SAN FRANCISCO	SAN FRANCISCO	94109
13667	5280 GEARY BLVD	SAN FRANCISCO	SAN FRANCISCO	94118
13668	1496 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94102
13669	776 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94102
13670	200 W PORTAL AVE	SAN FRANCISCO	SAN FRANCISCO	94127
13671	3931 ALEMANY BLVD	SAN FRANCISCO	SAN FRANCISCO	94132
13583	901 HYDE ST	SAN FRANCISCO	SAN FRANCISCO	94109
09886	3400 CESAR CHAVEZ	SAN FRANCISCO	SAN FRANCISCO	94110
11385	1580 VALENCIA ST	SAN FRANCISCO	SAN FRANCISCO	94110
15296	2262 MARKET ST	SAN FRANCISCO	SAN FRANCISCO	94114
10044	45 CASTRO ST	SAN FRANCISCO	SAN FRANCISCO	94114
13640	500 PARNASSUS AVE, 1 LEVEL STE MU-005	SAN FRANCISCO	SAN FRANCISCO	94143
10631	14780 S HARLAN RD	LATHROP	SAN JOAQUIN	95330
02961	75 N HAM LANE	LODI	SAN JOAQUIN	95242
06290	937 N H ST	LODI	SAN JOAQUIN	95242
02526	560 N MAIN ST	MANTECA	SAN JOAQUIN	95336
10454	1071 N MAIN ST	MANTECA	SAN JOAQUIN	95336
09716	102 N JACK TONE RD, # R	RIPON	SAN JOAQUIN	95366
02645	678 N WILSON WAY STE 15	STOCKTON	SAN JOAQUIN	95205
02680	15 W HARDING WAY	STOCKTON	SAN JOAQUIN	95204
02770	7929 LOWER SACRAMENTO RD	STOCKTON	SAN JOAQUIN	95210
04343	29 E MARCH LN	STOCKTON	SAN JOAQUIN	95207
10482	7850 WEST LANE	STOCKTON	SAN JOAQUIN	95210
02434	1830 W 11TH ST	TRACY	SAN JOAQUIN	95376
10766	2810 S TRACY BLVD	TRACY	SAN JOAQUIN	95377
07210	8005 EL CAMINO REAL	ATASCADERO	SAN LUIS OBISPO	93422
00063	900 RALSTON AVE	BELMONT	SAN MATEO	94002
00086	1420 HOWARD AVE	BURLINGAME	SAN MATEO	94010
06655	1160 BROADWAY	BURLINGAME	SAN MATEO	94010
12257	260 EL CAMINO REAL	BURLINGAME	SAN MATEO	94010
00324	395 S MAYFAIR AVE	DALY CITY	SAN MATEO	94015

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
01807	22 SAN PEDRO RD	DALY CITY	SAN MATEO	94014
05365	6100 MISSION ST	DALY CITY	SAN MATEO	94014
00324	216 WESTLAKE CTR	DALY CITY	SAN MATEO	94015
00324	395 S. MAYFAIR AVE	DALY CITY	SAN MATEO	94015
07087	643 SANTA CRUZ AVE	MENLO PARK	SAN MATEO	94025
00625	615 BROADWAY	MILLBRAE	SAN MATEO	94030
07970	45 S EL CAMINO REAL	MILLBRAE	SAN MATEO	94030
11261	520 PALMETTO AVE	PACIFICA	SAN MATEO	94044
02939	333 EL CAMINO REAL	SAN BRUNO	SAN MATEO	94066
02126	1414 EL CAMINO REAL	SAN CARLOS	SAN MATEO	94070
10661	975 INDUSTRIAL RD STE E & G	SAN CARLOS	SAN MATEO	94070
03296	191 E 3RD AVE	SAN MATEO	SAN MATEO	94401
05006	4070 S EL CAMINO REAL	SAN MATEO	SAN MATEO	94403
00884	2238 WESTBOROUGH BLVD	SOUTH SAN FRANCISCO	SAN MATEO	94080
03346	399 EL CAMINO REAL	SOUTH SAN FRANCISCO	SAN MATEO	94080
06289	5900 CALLE REAL	GOLETA	SANTA BARBARA	93117
06290	937 N H ST	LOMPOC	SANTA BARBARA	93436
06287	2399 S BROADWAY	SANTA MARIA	SANTA BARBARA	93454
06288	707 N BROADWAY	SANTA MARIA	SANTA BARBARA	93454
02957	1660 WINCHESTER BLVD	CAMPBELL	SANTA CLARA	95008
06585	1570 W CAMPBELL AVE	CAMPBELL	SANTA CLARA	95008
04416	20011 BOLLINGER RD	CUPERTINO	SANTA CLARA	95014
09516	770 1ST ST	GILROY	SANTA CLARA	95020
07088	303 2ND ST	LOS ALTOS	SANTA CLARA	94022
02786	14100 BLOSSOM HILL RD	LOS GATOS	SANTA CLARA	95032
07326	423 N SANTA CRUZ AVE	LOS GATOS	SANTA CLARA	95030
03671	342 W CALAVERAS BLVD	MILPITAS	SANTA CLARA	95035
05480	1833 N MILPITAS BLVD	MILPITAS	SANTA CLARA	95035
04516	745 E DUNNE AVE	MORGAN HILL	SANTA CLARA	95037
00689	121 E EL CAMINO REAL	MOUNTAIN VIEW	SANTA CLARA	94040
02659	112 RENGSTORFF AVE	MOUNTAIN VIEW	SANTA CLARA	94043
13948	1905 W EL CAMINO REAL	MOUNTAIN VIEW	SANTA CLARA	94040
00781	300 UNIVERSITY AVE	PALO ALTO	SANTA CLARA	94301
13596	300 UNIVERSITY AVE	PALO ALTO	SANTA CLARA	94301
02147	875 BLAKE WILBUR DR, STE CC-1101 MC 5834	PALO ALTO	SANTA CLARA	94304
03344	4170 EL CAMINO REAL	PALO ALTO	SANTA CLARA	94306
06869	2605 MIDDLEFIELD RD	PALO ALTO	SANTA CLARA	94306
12141	328 UNIVERSITY AVE	PALO ALTO	SANTA CLARA	94301
00840	1334 SARATOGA AVE	SAN JOSE	SANTA CLARA	95129
00842	350 N CAPITOL AVE	SAN JOSE	SANTA CLARA	95133
00900	2105 MORRILL AVE	SAN JOSE	SANTA CLARA	95132
01179	1795 E CAPITOL EXPY	SAN JOSE	SANTA CLARA	95121
01897	2585 ALMADEN RD	SAN JOSE	SANTA CLARA	95125
02081	1760 STORY RD	SAN JOSE	SANTA CLARA	95122
02169	5536 MONTEREY HWY	SAN JOSE	SANTA CLARA	95138

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
02265	1130 BIRD AVE	SAN JOSE	SANTA CLARA	95125
02384	2680 UNION AVE	SAN JOSE	SANTA CLARA	95124
02739	440 BLOSSOM HILL RD	SAN JOSE	SANTA CLARA	95123
03378	1376 KOOSER RD	SAN JOSE	SANTA CLARA	95118
03445	2799 S WHITE RD	SAN JOSE	SANTA CLARA	95148
03754	1399 W SAN CARLOS ST	SAN JOSE	SANTA CLARA	95126
04372	780 E SANTA CLARA ST	SAN JOSE	SANTA CLARA	95112
05219	5 S 1ST ST	SAN JOSE	SANTA CLARA	95113
05454	1661 MCKEE RD	SAN JOSE	SANTA CLARA	95116
07079	1615 MERIDIAN AVE	SAN JOSE	SANTA CLARA	95125
09171	4095 EVERGREEN VILLAGE SQ	SAN JOSE	SANTA CLARA	95135
00895	2012 EL CAMINO REAL	SANTA CLARA	SANTA CLARA	95050
02612	200 N WINCHESTER BLVD	SANTA CLARA	SANTA CLARA	95050
02740	3460 EL CAMINO REAL	SANTA CLARA	SANTA CLARA	95051
03380	1306 S MARY AVE	SUNNYVALE	SANTA CLARA	94087
07080	105 E EL CAMINO REAL	SUNNYVALE	SANTA CLARA	94087
09782	780 E EL CAMINO REAL	SUNNYVALE	SANTA CLARA	94087
02810	1810 FREEDOM BLVD	FREEDOM	SANTA CRUZ	95019
03158	1718 SOQUEL AVE	SANTA CRUZ	SANTA CRUZ	95062
06214	210 MOUNT HERMON RD	SCOTTS VALLEY	SANTA CRUZ	95066
04243	980 E CYPRESS AVE	REDDING	SHASTA	96002
05699	115 LAKE BLVD E	REDDING	SHASTA	96003
05781	1775 EUREKA WAY	REDDING	SHASTA	96001
01940	1955 TEXAS ST	FAIRFIELD	SOLANO	94533
02644	2010 ALAMO DR	VACAVILLE	SOLANO	95687
02575	2647 SPRINGS RD	VALLEJO	SOLANO	94591
03171	1050 REDWOOD ST	VALLEJO	SOLANO	94590
03084	7800 OLD REDWOOD HWY	COTATI	SONOMA	94931
03297	3093 MARLOW RD	SANTA ROSA	SONOMA	95403
06722	4610 SONOMA HWY	SANTA ROSA	SONOMA	95409
02842	840 OAKDALE	MODESTO	STANISLAUS	95355
02865	1101 MCHENRY AVE	MODESTO	STANISLAUS	95350
02902	2101 E HATCH RD	MODESTO	STANISLAUS	95351
04331	401 PARADISE RD	MODESTO	STANISLAUS	95351
05498	3500 COFFEE RD	MODESTO	STANISLAUS	95355
06355	4201 DALE RD	MODESTO	STANISLAUS	95356
07313	1700 STANDIFORD AVE	MODESTO	STANISLAUS	95350
11705	3019 FLOYD AVE	MODESTO	STANISLAUS	95355
11934	444 W F ST	OAKDALE	STANISLAUS	95361
09955	995 SPERRY AVE	PATTERSON	STANISLAUS	95363
03030	1591 GEER RD	TURLOCK	STANISLAUS	95380
00993	855 COLUSA AVE	YUBA CITY	SUTTER	95991
07433	1781 COLUSA HWY	YUBA CITY	SUTTER	95993
12259	1640 LINCOLN RD	YUBA CITY	SUTTER	95993
07653	1145 S MAIN ST	RED BLUFF	TEHAMA	96080

Exhibit A - Walgreens Facilities Currently Open

Facility	Address	City	County	Zip
10201	170 W EL MONTE WAY	DINUBA	TULARE	93618
09844	416 W OLIVE AVE	PORTERVILLE	TULARE	93257
06298	49 W TULARE AVE	TULARE	TULARE	93274
10002	1418 E PROSPERITY AVE	TULARE	TULARE	93274
02869	1407 N DINUBA BLVD	VISALIA	TULARE	93291
03476	100 W WALNUT AVE	VISALIA	TULARE	93277
06683	5328 W CYPRESS AVE	VISALIA	TULARE	93277
11407	3010 N DEMAREE ST	VISALIA	TULARE	93291
10738	140 W LOS ANGELES AVE	MOORPARK	VENTURA	93021
05846	2303 E VINEYARD AVE	OXNARD	VENTURA	93036
07305	2851 S ROSE AVE	OXNARD	VENTURA	93033
11707	1801 N ROSE AVE	OXNARD	VENTURA	93030
07449	481 S VENTURA RD	OXNARD	VENTURA	93030
10354	2417 SYCAMORE DR	SIMI VALLEY	VENTURA	93065
07992	550 N VENTU PARK RD	THOUSAND OAKS	VENTURA	91320
10041	5574 EVERGLADES ST STE C & D	VENTURA	VENTURA	93003
12118	5687 COLT ST	VENTURA	VENTURA	93003
04198	1351 W CAPITOL AVE	WEST SACRAMENTO	YOLO	95691
04107	10 W MAIN ST	WOODLAND	YOLO	95695
DC	2370 E MAIN ST	WOODLAND	YOLO	95776
02277	602 10TH ST	MARYSVILLE	YUBA	95901
12527	2293 RIVER OAKS BLVD	PLUMAS LAKE	YUBA	95961

Exhibit A - Walgreens Facilities Currently Closed

Facility	Address	City	County	Zip	Closed
06386	4810 KINGS CANYON RD	FRESNO	FRESNO	93727	5/2/2006
FUTURE WALGREENS OF TUJUNGA	11331 CAMARILLO ST	NORTH HOLLYWOOD	LOS ANGELES	91602	6/29/2006
	2321 HAWTHORNE BLVD	REDONDO BEACH	LOS ANGELES	90278	11/15/2007
	2989 ARTESIA BLVD	REDONDO BEACH	LOS ANGELES	90278	4/17/2007
DC	17500 PERRIS BLVD	MORENO VALLEY	RIVERSIDE	92551	1/16/2006
	1285 S MISSION RD	FALLBROOK	SAN DIEGO	92028	4/17/2008
01126	1979 MISSION ST	SAN FRANCISCO	SAN FRANCISCO	94103	8/29/2006
04492	25 DRUMM ST	SAN FRANCISCO	SAN FRANCISCO	94111	6/30/2008
01386	444 N SANTA CRUZ AVE A	LOS GATOS	SANTA CLARA	95030	8/29/2006
07079	1615 MERIDIAN AVE	SAN JOSE	SANTA CLARA	95125	6/30/2008
07080	105 E EL CAMINO REAL	SUNNYVALE	SANTA CLARA	94087	6/30/2008
03158	1718 SOQUEL AVE	SANTA CRUZ	SANTA CRUZ	95062	3/18/2009