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**LOS ANGELES  
SUPERIOR COURT**

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People of the State of California

10 (Additional counsel on next pages)

12 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **IN AND FOR THE COUNTY OF LOS ANGELES**

15 **THE PEOPLE OF THE STATE OF CALIFORNIA,**  
16 **Plaintiff,**  
17 **v.**  
18 **HOME DEPOT U.S.A., Inc., a Delaware**  
**Corporation, and DOES 1 through 99,**  
19 **Defendants.**

Case No.: BC376095

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

(Health & Saf. Code, Div. 20,  
Chapters 6.5 and 6.95; Bus. &  
Prof. Code, § 17200 *et seq.*, Labor  
Code § 6300 *et seq.*, California  
Fire Code)

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12 **Attorneys for Plaintiff, People of the State of California**

13  
14  
15 **PLAINTIFF, PEOPLE OF THE STATE OF CALIFORNIA**, based on information  
16 and belief, alleges as follows:

17 **PLAINTIFF**

18 1. Plaintiff, PEOPLE OF THE STATE OF CALIFORNIA (“People”), brings this  
19 action by and through Edmund G. Brown Jr., Attorney General of the State of California  
20 (“Attorney General”), and by and through Rocky Delgadillo, City Attorney of the City of Los  
21 Angeles; Steve Cooley, District Attorney of Los Angeles County; Dean D. Flippo, District  
22 Attorney of Monterey County; Rod Pacheco, District Attorney of the County of Riverside; James  
23 P. Willett, District Attorney of San Joaquin County; and Dolores A. Carr, District Attorney of the  
24 County of Santa Clara (collectively “Local Prosecutors”).

25 2. Pursuant to California Health and Safety Code section 25145.4, the Attorney  
26 General may bring a civil action in the name of the People of the State of California to enjoin any  
27 violation of Chapter 6.5 of Division 20 of the California Health and Safety Code (hereinafter  
28 “Chapter 6.5”) and to seek civil penalties for violations of the provisions of Chapter 6.5.

1           3.       Pursuant to California Health and Safety Code section 25182, the Local  
2 Prosecutors at the request of a unified program agency may bring a civil action in the name of the  
3 People of the State of California to enjoin any violation of Chapter 6.5 and to seek civil penalties  
4 for violations of the provisions of Chapter 6.5 which are under the jurisdiction of the unified  
5 program agency. Several local agencies, environmental health departments, and unified program  
6 agencies have requested the Local Prosecutors to bring a civil action in the name of the People of  
7 the State of California to enjoin violations of Chapter 6.5, and to seek civil penalties for  
8 violations of the provisions of Chapter 6.5 that are under the jurisdiction of the agencies.

9           4.       Pursuant to the California Health and Safety Code sections 25514 and 25516.1,  
10 the Attorney General and the Local Prosecutors may bring an action for civil penalties for  
11 violations of California Health and Safety Code sections 25503.5 to 25505, inclusive, and  
12 sections 25508 to 25520, inclusive. Pursuant to California Health and Safety Code section  
13 25516, the Local Prosecutors, when requested by an administering agency, may bring an action to  
14 enjoin a violation of Chapter 6.95 of Division 20 of the California Health and Safety Code  
15 (hereinafter "Chapter 6.95"). Several administering agencies have requested the Attorney  
16 General and the Local Prosecutors to bring an action to enjoin violations of Chapter 6.95, and to  
17 seek civil penalties for violations of the provisions of Chapter 6.95 that are under the jurisdiction  
18 of the agencies.

19           5.       Pursuant to California Business and Professions Code sections 17203, 17204, and  
20 17206, the Attorney General and the Local Prosecutors may bring actions in the name of the  
21 People of the State of California in a superior court for an injunction against any person who  
22 engages, had engaged, or proposes to engage in unfair competition and for civil penalties for each  
23 act of unfair competition.

24           6.       As adopted in Part 9 of Title 24 of the California Code of Regulations, the  
25 California Fire Code sets forth fire safety regulations consistent with nationally-recognized good  
26 practices for the safeguarding, to a reasonable degree, life and property from the hazards of fire  
27 explosion, and dangerous conditions arising from the storage, handling and use of hazardous  
28 materials and devices, and from conditions hazardous to life or property in the use or occupancy

1 of buildings or premises. The provisions of the California Fire Code may supplement any and all  
2 laws relating to fire safety, including city, local authority, or municipal ordinances, and county  
3 codes and ordinances.

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

7 **DEFENDANT HOME DEPOT U.S.A., INC.**

8 8. Defendant Home Depot U.S.A., Inc. (hereinafter "Home Depot") is now and, at  
9 all times mentioned in this complaint was, a Delaware corporation which does and did business  
10 in its own capacity and/or through affiliates in the State of California at the facilities identified in  
11 Exhibit A, which is incorporated herein by reference (hereinafter collectively referred to as  
12 "Covered Facilities"). Home Depot managed hazardous materials and hazardous wastes at  
13 Covered Facilities that are or were owned, operated, or acquired throughout California. Home  
14 Depot's principal address is 2455 Paces Ferry Road, Atlanta, Georgia. The People are informed  
15 and believe, and thereon allege, that Home Depot has acquired or is an owner and/or operator of  
16 some or all of the Covered Facilities. Home Depot owns or operates in California over 200  
17 stores that sell hazardous materials, including pool chemicals, pesticides, fertilizers, paints,  
18 ignitable liquids, aerosol products, and other flammable and corrosive materials. Home Depot  
19 also generates quantities of hazardous waste from either spills and releases, or from customer  
20 returns of damaged or spent packages of hazardous materials.

21 9. Defendant Home Depot is, or at all times relevant to the claims in this complaint  
22 was, legally responsible for compliance with the provisions of the California Health and Safety  
23 Code, including Chapters 6.5 and 6.95 of Division 20, at its Covered Facilities. The People are  
24 informed and believe and thereon allege that Home Depot is responsible for the operations of  
25 certain Covered Facilities in California, that Home Depot controls the hazardous materials and  
26 hazardous waste management decisions at those Covered Facilities, that Home Depot is aware of  
27 the hazardous materials and hazardous waste management activities at those Covered Facilities,  
28 that Home Depot took actions that caused some or all of the violations alleged herein, and that

1 Home Depot's authority, control and actions at those Covered Facilities and in conducting  
2 business in California are such that Home Depot could have taken action to prevent some or all  
3 of the violations alleged herein.

4 10. Home Depot is a "person," as defined at California Health and Safety Code  
5 section 25118. Home Depot is a "business," as defined at California Health and Safety Code  
6 section 25501, subdivision (d).

7 11. In this complaint when reference is made to any act of Defendant Home Depot,  
8 such allegations shall include acts of the owners, officers, directors, agents, employees,  
9 contractors, affiliates, or representatives of Defendant Home Depot that supervise, control or  
10 direct its employees and agents while engaged in the management, direction, operation or control  
11 of the affairs of the business organization and did so while acting within the course and scope of  
12 employment or agency of Home Depot.

### 13 **JURISDICTION AND VENUE**

14 12. Venue is proper in this county pursuant to California Health and Safety Code  
15 section 25183 in that certain of the violations alleged in the Complaint occurred in the County of  
16 Los Angeles and that certain other statewide violations alleged in the complaint are related to  
17 such violations. This court has jurisdiction pursuant to Article 6, section 10 of the California  
18 Constitution.

### 19 **STATUTORY AND REGULATORY BACKGROUND**

20 13. The State of California has enacted a comprehensive statutory and regulatory  
21 framework for the generation, handling, treatment, storage, transportation, and disposal of  
22 hazardous wastes. This framework, contained in Hazardous Waste Control Law, Chapter 6.5 of  
23 Division 20 of the California Health and Safety Code section 25100 *et seq.* ("HWCL" or  
24 "Chapter 6.5") and its implementing regulations, which are found at California Code of  
25 Regulations, title 22, section 66260.1 *et seq.*, mandates a "cradle to grave" system. The HWCL  
26 system is maintained to record the registration, tracking, storage, treatment, and disposal of  
27 hazardous wastes and to provide for the protection of the public from the potential risks posed by  
28 hazardous wastes.

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

7           15.     California law – the HWCL – has in certain instances a more inclusive definition  
8 of hazardous waste than does federal law. Hazardous wastes that are regulated under California  
9 law but not federal law are known as “non-RCRA hazardous wastes.” (Health & Saf. Code §  
10 25117.9.)

11           16.     Companies that accumulate or generate hazardous waste in the course of their  
12 operations and send that waste offsite for management are subject to certain regulatory  
13 requirements. (*See* Cal. Code Regs., tit. 22, § 66262.10 *et seq.*)

14           17.     It is unlawful for any person to transport hazardous wastes unless the person holds  
15 a valid registration issued by the DTSC, and it is unlawful for any person to transfer custody of a  
16 hazardous waste to a transporter who does not hold a valid registration. (Health & Saf. Code §  
17 25163, subd. (a).) California Code of Regulations, title 22, section 66263.11, specifies the  
18 procedure for a transporter to apply to the DTSC and obtain registration as a hauler.

19                           **ENFORCEMENT AUTHORITY UNDER THE HWCL**

20           18.     The HWCL authorizes a Court to impose civil penalties under two distinct and  
21 alternative provisions. Section 25189 of the California Health and Safety Code creates liability  
22 for any negligent or intentional violation of the HWCL, or for any violation of any permit, rule,  
23 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section  
24 25189.2 is a strict liability provision, which creates liability for any violation of the HWCL, or  
25 for any violation of any permit, rule, regulation, standard, or requirement issued or promulgated  
26 pursuant to the HWCL.

27           19.     The HWCL, pursuant to California Health and Safety Code sections 25181 and  
28 25184, authorizes the Court to issue an order that enjoins any ongoing or potential violation of

1 the HWCL, or any applicable rule, regulation, permit, standard, requirement, or order issued or  
2 promulgated pursuant to the HWCL.

3 20. Section 25181 of the California Health and Safety Code provides that when the  
4 DTSC or a unified program agency determines that any person has engaged in, is engaged in, or  
5 is about to engage in any acts or practices which constitute or will constitute a violation of any  
6 provision of the HWCL or any rule regulation, or requirement issued or promulgated thereunder,  
7 and when requested by the DTSC or unified program agency, the Attorney General or local  
8 prosecutor may make an application to the superior court for an order enjoining such acts or  
9 practices, or for an order directing compliance, and upon an appropriate showing by the DTSC or  
10 unified program agency that such person has engaged in or is about to engage in any such acts or  
11 practices, a permanent or temporary injunction, restraining order, or other order may be granted.

12 21. California Health and Safety Code section 25184 provides that in civil actions  
13 brought pursuant to the HWCL in which an injunction or temporary restraining order is sought:

14 it shall not be necessary to allege or prove at any stage of the proceeding that  
15 irreparable damage will occur should the temporary restraining order, preliminary  
16 injunction, or permanent injunction not be issued; or that the remedy at law is  
inadequate, and the temporary restraining order, preliminary injunction, or permanent  
injunction shall issue without such allegations and without such proof.

17  
18 22. The HWCL, in sections 25180 and 25185, authorizes the California DTSC, and  
19 properly designated local health agencies and unified program agencies, to enforce the standards  
20 codified in Chapter 6.5 and the regulations adopted pursuant to the California Health and Safety  
21 Code, and to conduct inspections.

### 22 GENERAL ALLEGATIONS

23 23. Plaintiff and Defendant Home Depot entered into a series of agreements to toll  
24 any applicable statute of limitations. As a result of these agreements, the period of time from  
25 July 25, 2005, through the date of the filing of the Complaint herein, inclusive, (the "Tolling  
26 Period"), will not be included in computing the time limited by any statute of limitations under  
27 the causes of action against Home Depot that may arise out of claims covered by the tolling  
28 agreement. Those claims include the claims that are brought in this action against Home Depot.

1           24.     During times relevant to the allegations set forth in this Complaint, Home Depot  
2 collected hazardous wastes that had been created, released, spilled, generated, or accumulated at  
3 stores and placed those hazardous wastes in buckets of varying colors for offsite disposal. Home  
4 Depot used several waste haulers to pick up and transport for disposal at licensed disposal  
5 facilities those hazardous wastes collected and stored at Home Depot stores in California.  
6 During 2004, one of the haulers collecting and transporting hazardous wastes from Home Depot  
7 stores in California was Slate Transportation Services (“Slate”) who was subcontracted through  
8 Environmental Industries (“EI”). Home Depot subsequently learned that Slate was not licensed  
9 nor authorized by the California Department of Toxic Substances Control (“DTSC”) in 2004 to  
10 collect or transport hazardous waste in the state of California.

11           25.     On the morning of May 13, 2004, an employee of Slate arrived at a Home Depot  
12 facility in Playa del Rey, California. At the Home Depot store, the Slate employee handled the  
13 hazardous materials and hazardous wastes stored in 5-gallon buckets at the Home Depot store by  
14 combining the contents of the buckets into larger 55-gallon drums. The contents of one of these  
15 drums located at this Home Depot store exploded, causing a fire during regular business hours  
16 leading to the evacuation of store employees and customers, and requiring the Los Angeles  
17 County Fire Department to respond.

18           26.     On May 14, 2004, a separate Slate truck was inspected by the California Highway  
19 Patrol (CHP) and the DTSC in Ripon, California, located in San Joaquin County. That particular  
20 Slate truck was pulling a trailer that contained numerous drums, other containers, and buckets of  
21 hazardous waste which had been collected from Home Depot stores and other businesses in  
22 California. DTSC concluded that Slate improperly stored and labeled the hazardous wastes and  
23 hazardous materials, and had not completed the required hazardous waste transportation  
24 manifests for hazardous materials and hazardous wastes being transported in that truck.

25           27.     Throughout 2004, up until at least May of 2004, Slate was not licensed nor  
26 authorized by the DTSC to collect or transport hazardous waste in the state of California.

27           28.     In March of 2005, the Attorney General’s Office, along with the District Attorney  
28 of San Joaquin, received from DTSC information related to an investigation of Slate for

1 numerous violations of hazardous waste transportation laws. The Attorney General's Office and  
2 the District Attorney of San Joaquin County joined with the District Attorneys' offices in Los  
3 Angeles County, Riverside County, Monterey County, and Santa Clara County, and with the City  
4 Attorney of Los Angeles to coordinate investigation of Slate and Home Depot. The investigation  
5 focused on violations of California state and municipal laws regarding illegal storage, treatment,  
6 transportation, and disposal of hazardous wastes, as well as compliance with fire code and  
7 hazardous materials management plan requirements for each Home Depot store and facility in  
8 California. The investigation revealed that violations had been observed at certain Home Depot  
9 stores in the State of California during the preceding years, including violations that were  
10 observed after the Playa del Rey fire.

11         29. Plaintiff is informed and believes and thereupon alleges that Defendants have  
12 violated provisions of the following statutes, including implementing regulations associated with  
13 each of the statutes and any related permit, rule, standard, or requirement issued or promulgated  
14 pursuant to these statutes and any similar and related federal statutes and municipal and local  
15 ordinances, at Covered Facilities within the time period applicable to this action: Chapter 6.5 of  
16 the California Health and Safety Code, section 25100 *et seq.*, Chapter 6.95 of the California  
17 Health and Safety Code, section 25500 *et seq.*, Division 5, Chapters 1-8 of the California Labor  
18 Code, section 6300 *et seq.*, with respect to hazardous substances, hazardous materials, and  
19 hazardous waste handling procedures and requirements; local state and Uniform Fire Codes,  
20 including but not limited to the Uniform Fire Code and the California Fire Code; and parts of the  
21 California Vehicle Code with respect to hazardous substances, hazardous materials, and  
22 hazardous waste handling procedures and requirements.

23         30. Plaintiff is informed and believes and thereupon alleges that Defendants engaged  
24 in conduct or failed to act in a manner that violated provisions of the statutory and legal  
25 requirements identified in Paragraph 29, including but not limited to the following:

26             a. Operate facilities in a manner to minimize the possibility of a fire,  
27 explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste  
28 constituents to air, soil, or surface water which could threaten human health or the environment;

1 and, manage, identify the date of accumulation, and label containers of hazardous waste, in  
2 accordance with California Code of Regulations, title 22, section 66262.34;

3           b.       Label containers of hazardous waste before transporting or offering  
4 hazardous waste for transportation off-site at facilities, in accordance with California Code of  
5 Regulations, title 22, section 66262.31;

6           c.       Transfer custody of hazardous wastes to a transporter that holds a valid  
7 registration issued by the DTSC; and, engaging in the transportation of hazardous waste at, to,  
8 from and between facilities without a valid registration issued by the DTSC, in violation of  
9 California Health and Safety Code section 25163;

10           d.       Prepare hazardous waste manifests and retain manifests in accordance  
11 with California Code of Regulations, title 22, section 66260 *et seq.*;

12           e.       Report to an administering agency releases of hazardous materials at  
13 facilities in accordance with California Health and Safety Code section 25507, subdivision (a);

14           f.       Establish and implement business plans for its facilities, including training  
15 in safety procedures in the event of a release, in accordance with the requirements of California  
16 Health and Safety Code section 25504;

17           g.       Maintain inventories of hazardous materials submit and certify a business  
18 plan, or modify when necessary, for facilities in accordance with California Health and Safety  
19 Code sections 25505, 25509, and 25510;

20           h.       Have material safety data sheets for all regulated hazardous materials  
21 readily available on the premises in accordance with California Fire Code section 8001.6, and  
22 have secondary containment for hazardous materials present at facilities in accordance with the  
23 law;

24           i.       Comply with the requirements of the Uniform Fire Code as adopted by the  
25 California Fire Code, sections 8001 *et seq.*, and numerous local ordinances in violation of  
26 uniform and other fire code provisions;

27           j.       Comply with the requirements of the California Labor Code and numerous  
28 regulations governing workplace safety standards in violation of Labor Code provisions.

1 k. Comply with the requirements of numerous local ordinances in violation  
2 of California Business and Professions Code section 17200 *et seq.*

3 31. Defendants' noncompliance threatened public health and safety and the  
4 environment.

5 **FIRST CAUSE OF ACTION**  
6 **Intentional and Negligent Violations of Hazardous Waste Control Laws**  
7 **(California Health & Safety Code Section 25189 and Implementing Regulations)**

8 32. Plaintiff realleges and incorporates by reference, as though set forth in full herein,  
9 the allegations contained in Paragraphs 1 through 31, inclusive, of this Complaint.

10 33. Defendants are liable for civil penalties as set forth in California Health and  
11 Safety Code section 25189, subdivision (b), for each and every separate intentional violation and  
12 for each and every negligent violation of any provision of Chapter 6.5 of the California Health  
13 and Safety Code section 25100 *et seq.*, and any applicable permit, rule, regulation, standard, or  
14 requirement issued or promulgated pursuant thereto which occurred within five years after the  
15 discovery of the facts constituting grounds for commencing the action on these claims, exclusive  
16 of any applicable tolling periods and those set forth in Paragraph 23 herein.

17 34. Each violation subjects Defendants to a separate and additional penalty for each  
18 violation. Pursuant to section 25189 of the California Health and Safety Code, a separate civil  
19 penalty must be imposed for each separate violation, and each penalty that must be imposed is  
20 also separate and in addition to any other civil penalty imposed under this section and separate  
21 and in addition to any other civil penalty imposed under any other provision of law.

22 35. Defendants must be immediately and permanently enjoined from further  
23 violations of Chapter 6.5.

24 **SECOND CAUSE OF ACTION**  
25 **Strict Liability Violations of Hazardous Waste Control Laws**  
26 **(California Health & Safety Code Section 25189.2 and Implementing Regulations)**

27 36. Plaintiff realleges Paragraphs 1 through 35, inclusive.

28 37. Defendants are liable for civil penalties as set forth in California Health and  
Safety Code section 25189.2, subdivision (b), for each and every separate violation of any

1 provision of Chapter 6.5 of the California Health and Safety Code and any applicable permit,  
2 rule, regulation, standard, or requirement issued or promulgated pursuant thereto which occurred  
3 within five years after the discovery of the facts constituting grounds for commencing the action,  
4 exclusive of any applicable tolling periods and those set forth in Paragraph 23 herein.

5 38. Each violation subjects Defendants to a separate and additional penalty for each  
6 violation under this cause of action. However, pursuant to section 25189.2, subdivision (d), of  
7 the California Health and Safety Code, no liability for a civil penalty under section 25189.2 may  
8 be imposed for the same act or failure to act if a separate civil penalty is or has been imposed for  
9 that violation pursuant to section 25189 of the California Health and Safety Code.

10 39. Defendants must be immediately and permanently enjoined from further violations  
11 of Chapter 6.5.

12 **THIRD CAUSE OF ACTION**  
13 **(Violations of HWCL, Vehicle Codes, and Hazardous Waste Transportation Laws)**

14 40. Plaintiff realleges Paragraphs 1 through 39, inclusive.

15 41. Defendants are liable for civil penalties as set forth in California Health and  
16 Safety Code section 25189, subdivision (b), for each and every separate intentional violation of  
17 laws relating to transportation of hazardous waste, and for each and every negligent violation of  
18 laws relating to transportation of hazardous waste, including any provision of Chapter 6.5 of the  
19 California Health and Safety Code, section 25100 *et seq.*, and any applicable permit, rule,  
20 regulation, standard, or requirement issued or promulgated pursuant thereto which occurred  
21 within five years after the discovery of the facts constituting grounds for commencing the action  
22 on these claims, exclusive of any applicable tolling periods and those set forth in Paragraph 23  
23 herein. Defendants also are liable for separate and additional civil penalties as set forth in  
24 applicable provisions of Divisions 14.1, 14.7, and 14.8 of the California Vehicle Code, section  
25 32000 *et seq.*, for each and every separate violation.

26 42. Each violation subjects Defendants to a separate and additional penalty for each  
27 violation. Pursuant to section 25189 of the California Health and Safety Code, a separate civil  
28 penalty must be imposed for each separate violation, and each penalty that must be imposed is

1 also separate and in addition to any other civil penalty imposed under this section and separate  
2 and in addition to any other civil penalty imposed under any other provision of law.

3 43. Defendants must be immediately and permanently enjoined from further  
4 violations of Chapter 6.5.

5 **FOURTH CAUSE OF ACTION**  
6 **(Violations of Hazardous Materials Release Response Plans and Inventory Laws)**

7 44. Plaintiff realleges Paragraphs 1 through 43, inclusive.

8 45. Defendants are liable for civil penalties as set forth in California Health and  
9 Safety Code section 25514 for each and every separate violation of California Health and Safety  
10 Code sections 25503.5 to 25505, inclusive, and sections 25508 to 25510,, inclusive, and any  
11 applicable permit, rule, regulation, standard, or requirement issued or promulgated pursuant  
12 thereto which occurred within five years after the discovery of the facts constituting grounds for  
13 commencing the action on these claims, exclusive of any applicable tolling periods and those set  
14 forth in Paragraph 23 herein.

15 46. As a consequence of Defendants' violation of each of these sections, Defendants  
16 are liable for a civil penalty that must be imposed for each separate violation in an amount up to  
17 \$2,000.00 for each day in which the violation occurred, pursuant to California Health and Safety  
18 Code section 25514, subdivision (a). Where the violation resulted in or significantly contributes  
19 to an emergency, Defendants also shall be liable for the full cost of the agency emergency  
20 response as well as the cost of cleaning up and disposing of the hazardous material.

21 47. As a consequence of Defendants' knowing violation of any of these sections,  
22 Defendants are liable for a civil penalty that must be imposed for each separate violation in an  
23 amount up to \$5,000.00 for each day in which the violation occurred, pursuant to California  
24 Health and Safety Code section 25514, subdivision (b).

25 48. Defendants must be immediately and permanently enjoined from further  
26 violations of Chapter 6.95.

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1 **FIFTH CAUSE OF ACTION**

2 **(Violations of California Labor Code and Title 8 of the California Code of Regulations)**

3 49. Plaintiff realleges Paragraph 1 through 48, inclusive.

4 50. Pursuant to California Labor Code section 6300 *et seq.* and solely with respect to  
5 hazardous materials and hazardous waste handling procedures and requirements, every employer  
6 must furnish a place of employment that is safe and healthful for the employees, and must furnish  
7 appropriate safe devices, adopt safe practices and programs, and comply with regulations,  
8 requirements, orders, special orders, and workplace safety standards, such as those adopted in  
9 Title 8 of the California Code of Regulations.

10 51. Defendants are liable for civil penalties, as set forth in California Labor Code  
11 section 6427 *et seq.* for each and every separate violation which occurred within five years after  
12 the discovery of the facts constituting grounds for commencing the action on these claims,  
13 exclusive of any applicable tolling periods and those set forth in Paragraph 23 herein.

14 52. Defendants must be immediately and permanently enjoined from further  
15 violations of California Labor Code section 6300 *et seq.*, and the implementing regulations  
16 adopted thereunder.

17 **SIXTH CAUSE OF ACTION**

18 **(Violations of Unfair Competition Laws)**

19 53. Plaintiff realleges Paragraphs 1 through 52, inclusive.

20 54. Pursuant to California Business and Professions Code section 17206, Defendants  
21 are liable for civil penalties for each and every separate violation that accrued within four years  
22 of this Complaint, exclusive of any applicable tolling periods and those set forth in Paragraph 23  
23 herein. Defendants have engaged in unlawful acts, omissions, and practices that constitute unfair  
24 competition within the meaning of California Business and Professions Code section 17200 *et*  
25 *seq.*, including but not limited to the following:

26 a. The acts or omissions and practices alleged in the FIRST through FIFTH  
27 Causes of Action, above.

28 ///

1           b.       The acts or omissions and practices that constitute violations of Local,  
2 State, and Uniform Fire Codes, including the California Fire Code and numerous local  
3 ordinances in violation of uniform and other fire code provisions.

4           55.     By the acts described herein, Defendants engaged in daily acts of unlawful and/or  
5 unfair competition prohibited by California Business and Professions Code sections 17200-  
6 17208. Each and every separate act constitutes an unlawful and/or unfair business practice.  
7 Each day that Defendants engaged in each separate unlawful act, omission or practice is a  
8 separate and distinct violation of Business and Professions Code section 17200.

9           56.     Defendants must be immediately and permanently enjoined, pursuant to  
10 California Business and Professions Code section 17203, from engaging in activities that, as  
11 alleged in this Complaint, violate Chapters 6.5 and 6.95 of Division 20 of the California Health  
12 and Safety Code and implementing regulations, the Vehicle Code, the Uniform Fire Code as  
13 adopted by the California Fire Code and implementing regulations and local and municipal  
14 ordinances governing fire safety requirements, Labor Code section 6300 *et seq.* and  
15 implementing regulations, and other local ordinances, and which thereby constitute unfair  
16 competition within the meaning of California Business and Professions Code section 17200.

17 **WHEREFORE, PLAINTIFF PRAYS FOR THE FOLLOWING RELIEF:**

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

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

24           3.       A Permanent Injunction prohibiting Defendants from violating California Labor  
25 Code section 6300 *et seq.* and implementing regulations, which Defendants are alleged to have  
26 violated;

27           4.       A Permanent Injunction, issued pursuant to California Business and Professions  
28 Code section 17203, prohibiting Defendants from engaging in activity that violates the provisions

1 of Chapters 6.5 and 6.95 of Division 20 of the California Health and Safety Code, the Uniform  
2 Fire Code as adopted by the California Fire Code, and Labor Code section 6300 *et seq.*, as  
3 alleged in this complaint which thereby constitute unfair competition within the meaning of  
4 California Business and Professions Code section 17200;

5 5. Civil penalties according to proof against Defendants pursuant to California  
6 Health and Safety Code section 25189, subdivision (b), in an amount according to proof;

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

9 7. Civil penalties according to proof against Defendants pursuant to California  
10 Health and Safety Code section 25514, in an amount according to proof;

11 8. Civil penalties according to proof against Defendants pursuant to California  
12 Business and Professions Code section 17206 for each act of unfair competition engaged in by  
13 Defendants in an amount according to proof;

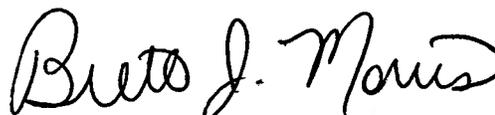
14 9. Grant the Plaintiff its cost of inspection, investigation, attorneys fees,  
15 enforcement, prosecution, and suit, herein, including but not limited to such costs as are  
16 authorized for reimbursement pursuant to Code of Civil Procedure section 1021.8; and,

17 10. Grant such other and further relief as the Court deems just and proper.

18 RESPECTFULLY REQUESTED:

19  
20 Dated: 8-13-07

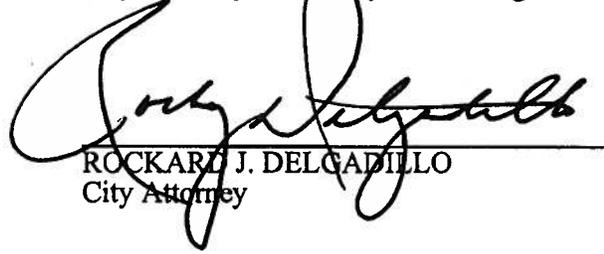
EDMUND G. BROWN JR., Attorney General  
of the State of California  
TOM GREENE  
Chief Assistant Attorney General  
THEODORA P. BERGER  
Senior Assistant Attorney General  
KEN ALEX  
Supervising Deputy Attorney General

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27 BRETT J. MORRIS  
Deputy Attorney General  
Attorneys for Plaintiff  
28 People of the State of California

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ROCKARD J. DELGADILLO,  
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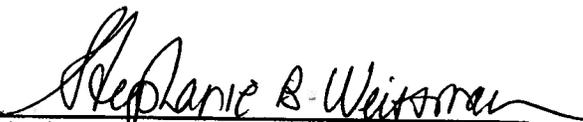
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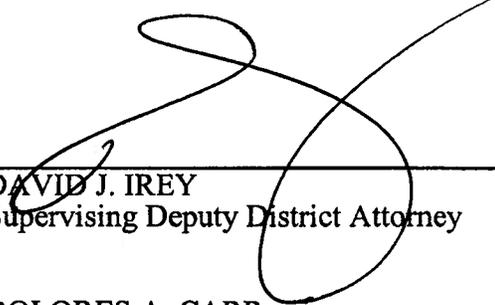
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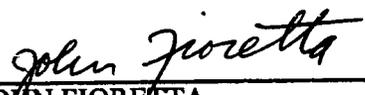
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JOHN FIORETTA  
Deputy District Attorney

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JOHN FIORETTA  
Deputy District Attorney

## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
1	3838 Hollis Avenue	Emeryville	Alameda
2	40525 Albrae Street	Fremont	Alameda
3	43900 Icehouse Terrace	Fremont	Alameda
4	21787 Hesperian Boulevard	Hayward	Alameda
5	2500 Las Positas Avenue	Livermore	Alameda
6	5401 Thornton Avenue	Newark	Alameda
7	4000 Alameda Avenue	Oakland	Alameda
8	6000 Johnson Drive	Pleasanton	Alameda
9	1933 Davis Street	San Leandro	Alameda
10	30055 Industrial Parkway West	Union City	Alameda
11	2580 Notre Dame Boulevard	Chico	Butte
12	2150 3rd Street	Oroville	Butte
13	5631 Lone Tree Way	Brentwood	Contra Costa
14	2090 Meridian Park Boulevard	Concord	Contra Costa
15	11939 San Pablo Avenue	El Cerrito	Contra Costa
16	1625 Sycamore Avenue	Hercules	Contra Costa
17	2300 North Park Boulevard	Pittsburg	Contra Costa
18	2750 Crow Canyon Road	San Ramon	Contra Costa
19	520 U.S. Highway 101 North	Crescent City	Del Norte
20	600 Placerville Drive	Placerville	El Dorado
21	845 West Shaw Avenue	Clovis	Fresno
22	3272 West Shaw	Fresno	Fresno
23	7150 North Abbey Street	Fresno	Fresno
24	4864 E. King Canyon Road	Fresno	Fresno
25	3175 Highland Avenue	Selma	Fresno
26	320 Wake Avenue	El Centro	Imperial
27	3501 North Sillect Avenue	Bakersfield	Kern
28	2655 Mt. Vernon Avenue	Bakersfield	Kern
29	8700 Rosedale Highway	Bakersfield	Kern
30	4700 Gosford Road	Bakersfield	Kern
31	601 Woollomes Avenue	Delano	Kern
32	575 N. China Lake	Ridgecrest	Kern
33	507 North Mill Street	Tehachapi	Kern
34	501 N. 12th Avenue	Hanford	King
35	500 South Marengo Avenue	Alhambra	Los Angeles
36	3200 Puente Avenue	Baldwin Park	Los Angeles
37	1200 Flower Street	Burbank	Los Angeles
38	21218 Roscoe Boulevard	Canoga Park	Los Angeles
39	110 East Sepulveda Boulevard	Carson	Los Angeles
40	10930 Alondra Boulevard	Cerritos	Los Angeles
41	7015 East Telegraph Road	Commerce	Los Angeles
42	1348 North Azusa Avenue	Covina	Los Angeles
43	7121 Firestone Boulevard	Downey	Los Angeles
44	9700 Lower Azusa Road	El Monte	Los Angeles
45	740 182nd Street	Gardena	Los Angeles
46	5040 San Fernando Road	Glendale	Los Angeles
47	1305 South Lone Hill Avenue	Glendora	Los Angeles
48	14603 Oceangate Avenue	Hawthorne	Los Angeles
49	3040 Slauson Avenue	Huntington Park	Los Angeles
50	18131 Gale Avenue	Industry	Los Angeles
51	3363 Century Boulevard	Inglewood	Los Angeles

**Exhibit A - To Complaint for Permanent Injunction, Civil Penalties and Other Equitable Relief  
in *People v. Home Depot U.S.A., Inc.***

## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
52	8801 S La Cienega Boulevard	Inglewood	Los Angeles
53	12300 La Mirada Boulevard	La Mirada	Los Angeles
54	5000 Hardwick Street	Lakewood	Los Angeles
55	44226 20th Street	Lancaster	Los Angeles
56	4550 Atlantic	Long Beach	Los Angeles
57	1830 West Slauson Avenue	Los Angeles	Los Angeles
58	1675 Wilshire Boulevard	Los Angeles	Los Angeles
59	4925 West Slauson Boulevard	Los Angeles	Los Angeles
60	12975 W. Jefferson Boulevard	Los Angeles	Los Angeles
61	5600 Sunset Boulevard	Los Angeles	Los Angeles
62	2055 North Figueora Street	Los Angeles	Los Angeles
63	1625 South Mountain Avenue	Monrovia	Los Angeles
64	11600 Sherman Way	North Hollywood	Los Angeles
65	340 West Avenue P	Palmdale	Los Angeles
66	7870 Van Nuys Boulevard	Panorama City	Los Angeles
67	6400 Alondra Boulevard	Paramount	Los Angeles
68	9200 Whittier Boulevard	Pico Rivera	Los Angeles
69	2707 South Towne Avenue	Pomona	Los Angeles
70	12960 Foothill Boulevard	San Fernando	Los Angeles
71	2115 North Gaffey Street	San Pedro	Los Angeles
72	20642 Golden Triangle Road	Santa Clarita	Los Angeles
73	28033 Newhall Ranch Road	Santa Clarita	Los Angeles
74	2450 Cherry Avenue	Signal Hill	Los Angeles
75	3100 Atlantic Avenue	Signal Hill	Los Angeles
76	24451 Crenshaw Boulevard	Torrance	Los Angeles
77	16810 Roscoe Boulevard	Van Nuys	Los Angeles
78	16800 Roscoe Boulevard	Van Nuys	Los Angeles
79	22855 Victory Boulevard	West Hills	Los Angeles
80	12322 Washington Boulevard	Whittier	Los Angeles
81	6345 Variel Avenue	Woodland Hills	Los Angeles
82	2155 Schnoor Avenue	Madera	Madera
83	111 Shoreline Parkway	San Rafael	Marin
84	350 North Orchard Avenue	Ukiah	Mendocino
85	1955 E. Pacheco Boulevard	Los Banos	Merced
86	1735 Highway 140	Merced	Merced
87	1800 North Main Street	Salinas	Monterey
88	1890 N. Davis Road	Salinas	Monterey
89	1590 Canyon Del Rey Boulevard	Seaside	Monterey
90	225 Soscol Avenue	Napa	Napa
91	2300 West Lincoln Avenue	Anaheim	Orange
92	1095 N. Pullman Street	Anaheim	Orange
93	800 N. Brookhurst Street	Anaheim	Orange
94	2455 E. Imperial Highway	Brea	Orange
95	2300-F Harbor Boulevard	Costa Mesa	Orange
96	5800 Lincoln Avenue	Cypress	Orange
97	23651 El Toro Road	El Toro/Lake Forest	Orange
98	601 South Placentia	Fullerton	Orange
99	10801 Garden Grove Boulevard	Garden Grove	Orange
100	7100 Warner Avenue	Huntington Beach	Orange
101	6200 Irvine Boulevard	Irvine	Orange
102	600 S. Harbor Boulevard	La Habra	Orange

**Exhibit A - To Complaint for Permanent Injunction, Civil Penalties and Other Equitable Relief  
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## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
103	24332 El Toro Road	Laguna Hills	Orange
104	27401 La Paz Road	Laguna Niguel	Orange
105	20021 Lake Forest Drive	Lake Forest	Orange
106	27952 Hillcrest	Mission Viejo	Orange
107	435 West Katella Avenue	Orange	Orange
108	1855 N. Tustin Street	Orange	Orange
109	3500 MacArthur Boulevard	Santa Ana	Orange
110	1750 E. Edinger Avenue	Santa Ana	Orange
111	12131 Beach Boulevard	Stanton	Orange
112	2782 El Camino Real	Tustin	Orange
113	6633 Westminster Boulevard	Westminster	Orange
114	23001 Savi Ranch Parkway	Yorba Linda	Orange
115	1000 Groveland Lane	Lincoln	Placer
116	324 North Sunrise Boulevard	Roseville	Placer
117	10001 Fairway Drive	Roseville	Placer
118	1480 East 2nd Street	Beaumont	Riverside
119	490 McKinley Street	Corona	Riverside
120	1355 East Ontario Avenue	Corona	Riverside
121	3400 West Florida	Hemet	Riverside
122	79900 Highway 111	La Quinta	Riverside
123	18282 Collier Avenue	Lake Elsinore	Riverside
124	6140 Hamner Avenue	Mira Loma	Riverside
125	12255 Pigeon Pass Road	Moreno Valley	Riverside
126	15975 Perris Boulevard	Moreno Valley	Riverside
127	25100 Madison Avenue	Murrieta	Riverside
128	34249 Monterey Avenue	Rancho Mirage	Riverside
129	3323 Madison Street	Riverside	Riverside
130	32020 Highway 79 South	Temecula	Riverside
131	6001 Madison Avenue	Carmichael	Sacramento
132	9150 West Stockton Boulevard	Elk Grove	Sacramento
133	2675 East Bidwell Street	Folsom	Sacramento
134	2756 Sunrise Boulevard	Rancho Cordova	Sacramento
135	4641 Florin Road	Sacramento	Sacramento
136	1461 Meadowview Road	Sacramento	Sacramento
137	8000 Folsom Boulevard	Sacramento	Sacramento
138	3611 Truxel Road	Sacramento	Sacramento
139	5859 Antelope Road	Sacramento	Sacramento
140	2000 Howe Avenue	Sacramento	Sacramento
141	12218 Apple Valley Road	Apple Valley	San Bernardino
142	1100 L Avenue	Barstow	San Bernardino
143	5450 Walnut Avenue	Chino	San Bernardino
144	16005 Sierra Lake Parkway	Fontana	San Bernardino
145	16783 Santa Ana Avenue	Fontana	San Bernardino
146	11884 Foothill Boulevard	Rancho Cucamonga	San Bernardino
147	1151 West Lugonia Avenue	Redlands	San Bernardino
148	1451 West Foothill Boulevard	Rialto	San Bernardino
149	695 Hospitality Lane	San Bernardino	San Bernardino
150	1055 West 21st	San Bernardino	San Bernardino
151	250 South Mountain	Upland	San Bernardino
152	1401 E. 19th Street	Upland	San Bernardino
153	15150 Bear Valley Road	Victorville	San Bernardino

**Exhibit A - To Complaint for Permanent Injunction, Civil Penalties and Other Equitable Relief  
In *People v. Home Depot U.S.A., Inc.***

## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
154	15655 Roy Rogers Drive	Victorville	San Bernardino
155	725 Plaza Court	Chula Vista	San Diego
156	390 East H Street	Chula Vista	San Diego
157	1320 Eastlake Parkway	Chula Vista	San Diego
158	965 Arnele Avenue	El Cajon	San Diego
159	1001 North El Camino Real	Encinitas	San Diego
160	1352 West Valley Parkway	Escondido	San Diego
161	1475 E. Valley Parkway	Escondido	San Diego
162	1550 West Valley Parkway	Escondido	San Diego
163	7530 Broadway	Lemon Grove	San Diego
164	3838 Vista Way	Oceanside	San Diego
165	5755 Mission Avenue	Oceanside	San Diego
166	12175 Tech Center Drive	Poway	San Diego
167	12185 Carmel Mountain Road	San Diego	San Diego
168	525 Saturn Boulevard	San Diego	San Diego
169	3555 Sports Arena Boulevard	San Diego	San Diego
170	6611 University Avenue	San Diego	San Diego
171	4255 Genesee	San Diego	San Diego
172	355 Market Place Avenue	San Diego	San Diego
173	950 Dennery Road	San Diego	San Diego
174	5920 Fairmount Avenue	San Diego	San Diego
175	10604 Westview Parkway	San Diego	San Diego
176	550 San Marcos Boulevard	San Marcos	San Diego
177	255 Town Center Parkway	Santee	San Diego
178	2430 S. Melrose Drive	Vista	San Diego
179	250 Commerce Avenue	Manteca	San Joaquin
180	3818 East Hammer Lane	Stockton	San Joaquin
181	5010 Feather River Drive	Stockton	San Joaquin
182	2461 Naglee Road	Tracy	San Joaquin
183	905 El Camino Real	Atascadero	San Luis Obispo
184	1551 Froom Ranch Way	San Luis Obispo	San Luis Obispo
185	91 Colma Boulevard	Colma	San Mateo
186	2 Colma Boulevard	Colma	San Mateo
187	303 East Lake Merced	Daly City	San Mateo
188	1781 East Bayshore Road	East Palo Alto	San Mateo
189	1125 Old County Road	San Carlos	San Mateo
190	2001 Chess Drive	San Mateo	San Mateo
191	6975 Marketplace Drive	Goleta	Santa Barbara
192	1701 E. Ocean Avenue	Lompoc	Santa Barbara
193	2120 South Bradley Road	Santa Maria	Santa Barbara
194	480 East Hamilton Avenue	Campbell	Santa Clara
195	8850 San Ysidro Avenue	Gilroy	Santa Clara
196	1177 Great Mall Drive	Milpitas	Santa Clara
197	860 East Dunne Avenue	Morgan Hill	Santa Clara
198	920 Blossom Hill Road	San Jose	Santa Clara
199	1855 Hillsdale Avenue	San Jose	Santa Clara
200	635 W. Capital Expressway	San Jose	Santa Clara
201	975 DeAnza Boulevard	San Jose	Santa Clara
202	2435 LaFayette Street	Santa Clara	Santa Clara
203	121 E. El Camino Real	Sunnyvale	Santa Clara
204	680 Kifer Road	Sunnyvale	Santa Clara

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## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
205	355 S. Green Valley Road	Watsonville	Santa Cruz
206	1200 Churn Creek Road	Redding	Shasta
207	2121 Cadenasso Drive	Fairfield	Solano
208	510 Orange Drive	Vacaville	Solano
209	1175 Admiral Callaghan Lane	Vallejo	Solano
210	4825 Redwood Drive	Rohnert Park	Sonoma
211	6280 Hembree Lane	Windsor	Sonoma
212	1415 East Hatch Road	Ceres	Stanislaus
213	1617 North Carpenter Road	Modesto	Stanislaus
214	5230 Squire Wells Road	Riverbank	Stanislaus
215	2800 Countryside Drive	Turlock	Stanislaus
216	1100 Tharp Road	Yuba City	Sutter
217	2650 Main Street	Red Bluff	Tehama
218	750 S. Jaye Street	Porterville	Tulare
219	1600 E Prosperity Avenue	Tulare	Tulare
220	3500 South Demaree Street	Visalia	Tulare
221	401 W. Ventura Boulevard	Camarillo	Ventura
222	2600 Vineyard Avenue	Oxnard	Ventura
223	401 W. Esplanade Drive	Oxnard	Ventura
224	575 Cochran Street	Simi Valley	Ventura
225	500 North Ventu Park Road	Thousand Oaks	Ventura
226	2745 Teller Road	Thousand Oaks	Ventura
227	1860 E. Main Street	Woodland	Yolo

NO.	ADDRESS	CITY	COUNTY
1	7050 Amador Plaza Road	Dublin	Alameda
2	6335 & 6341 Scarlett Court	Dublin	Alameda
3	6349 Scarlett Court	Dublin	Alameda
4	6337 Scarlett Court	Dublin	Alameda
5	40745 Encyclopedia Circle	Fremont	Alameda
6	off 407 Oak Manor Court	Hayward	Alameda
7	19202 Cabot Boulevard	Hayward	Alameda
8	3563 Investment Boulevard	Hayward	Alameda
9	31281 Weigman Road	Hayward	Alameda
10	297 South Vasco Road	Livermore	Alameda
11	5799 Las Positas	Livermore	Alameda
12	5715 Southfront Road	Livermore	Alameda
13	1555 40th Street	Oakland	Alameda
14	1140 Beecher Street	San Leandro	Alameda
15	2001 Davis Street	San Leandro	Alameda
16	1765 Atlantic Court	Union City	Alameda
17	34151 Zwissig Way	Union City	Alameda
18	3211 Danville Boulevard	Alamo	Contra Costa
19	1461 Concord Avenue	Concord	Contra Costa
20	5400 Ygnacio Valley Road	Concord	Contra Costa
21	1640 Challenge Drive	Concord	Contra Costa
22	1650 Challenge Drive	Concord	Contra Costa
23	1037 Arnold Drive	Martinez	Contra Costa
24	1310 Clegg Street	Petaluma	Contra Costa
25	13901 San Pablo Avenue	San Pablo	Contra Costa

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NO.	ADDRESS	CITY	COUNTY
26	5096 N. Blythe Avenue	Fresno	Fresno
27	3622 West Shaw Avenue	Fresno	Fresno
28	2909 S. Elm Avenue	Fresno	Fresno
29	2101 E. North Avenue	Fresno	Fresno
30	3050 S. Cedar Avenue	Fresno	Fresno
31	4710 E. Commerce Avenue	Fresno	Fresno
32	5780 E. Sheilds Avenue	Fresno	Fresno
33	3759 West Shaw Avenue	Fresno	Fresno
34	1583 River Drive	Brawley	Imperial
35	1101 South McCullom	El Centro	Imperial
36	260 South Imperial Avenue	Imperial	Imperial
37	497 West Wall Road	Imperial/El Centro	Imperial
38	2809 Unicorn Road	Bakersfield	Kern
39	19421 Colombo Street	Bakersfield	Kern
40	3027 Landco Drive	Bakersfield	Kern
41	17160 Alburdis Avenue	Artesia	Los Angeles
42	10816 Alondra Boulevard	Cerritos	Los Angeles
43	20131 Sunburst Street	Chatsworth	Los Angeles
44	21535-21651 Baker Parkway	City of Industry	Los Angeles
45	3160 Rosemead Boulevard	El Monte	Los Angeles
46	17600 S. Main Street	Gardena (Carson)	Los Angeles
47	440 Western Avenue	Glendale	Los Angeles
48	4828 W. 145th Street	Hawthorne	Los Angeles
49	14658 Alondra Boulevard	La Mirada	Los Angeles
50	42839 N. Sierra Highway	Lancaster	Los Angeles
51	5950 Paramount Boulevard	Long Beach	Los Angeles
52	10861 Weyburn Avenue	Los Angeles	Los Angeles
53	2311 Purdue Avenue	Los Angeles	Los Angeles
54	407 West Huntington Drive	Monrovia	Los Angeles
55	7601 Telegraph Road	Montebello	Los Angeles
56	1625 W. Washington Boulevard	Montebello	Los Angeles
57	7250 Laurel Canyon Boulevard	North Hollywood	Los Angeles
58	14080 Orange Avenue	Paramount	Los Angeles
59	1680 W. Mission Boulevard	Pomona	Los Angeles
60	19710 Susana Road	Rancho Dominguez	Los Angeles
61	1519 Hawthorne Boulevard	Redondo Beach	Los Angeles
62	28255 Kelly Johnson Parkway	Santa Clarita	Los Angeles
63	9837 Pioneer Boulevard	Santa Fe Springs	Los Angeles
64	11704 & 11705 Willake Street	Santa Fe Springs	Los Angeles
65	12801 Leffingwell Avenue	Sante Fe Springs	Los Angeles
66	16348 Foothill Boulevard	Sylmar	Los Angeles
67	27229 Turnberry Lane	Valencia	Los Angeles
68	28934 N. Hancock Parkway	Valencia	Los Angeles
69	26074 Avenue Hall	Valencia	Los Angeles
70	25108 Rye Canyon Loop	Valencia	Los Angeles
71	5400 McConnell Avenue	West Los Angeles	Los Angeles
72	1801 Fourth Street	San Rafael	Marin
73	3379 G Street	Merced	Merced
74	1276 Abbott Street	Salinas	Monterey
75	26940 Aliso Viejo Parkway	Aliso Viejo	Orange
76	1045 N. Kemp Street	Anaheim	Orange

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## EXHIBIT A

NO.	ADDRESS	CITY	COUNTY
77	1011 North Tustin Avenue	Anaheim	Orange
78	1350 Caldwell Circle	Anaheim	Orange
79	3250 E. Carpenter Avenue	Anaheim	Orange
80	6700 Artesia Boulevard	Buena Park	Orange
81	6311 Knot Avenue	Buena Park	Orange
82	3001 Redhill Avenue	Cosa Mesa	Orange
83	3120 Airway Avenue	Costa Mesa	Orange
84	669 South Placentia Avenue	Fullerton	Orange
85	701 Burning Tree	Fullerton	Orange
86	659 South Placentia	Fullerton	Orange
87	11822 Gilbert Street	Garden Grove	Orange
88	13591 Harbor Boulevard	Garden Grove	Orange
89	6912 Edinger Avenue	Huntington Beach	Orange
90	17701 Cowan Avenue	Irvine	Orange
91	751 E. Lambert Road	La Habra	Orange
92	601 E. Imperial Highway	La Habra	Orange
93	25600 Rancho Niguel Road	Laguna Niguel	Orange
94	3800 West Chapman Avenue	Orange	Orange
95	22931 Arroyo Vista	Rancho Santa Margarita	Orange
96	33061 Camino Capistrano	San Juan Capistrano	Orange
97	1723 S. Ritchey Street	Santa Ana	Orange
98	1920, 1922, 1924 E. Pomona Street	Santa Ana	Orange
99	2400 S. Garnsey Street	Santa Ana	Orange
100	7350 Bolsa Avenue	Westminster	Orange
101	22885 Savi Ranch Parkway	Yorba Linda	Orange
102	1111 Tinker Road	Rocklin	Placer
103	2001 Opportunity Drive	Roseville	Placer
104	2021 Opportunity Drive	Roseville	Placer
105	1508 Eureka Road	Roseville	Placer
106	1708 Eureka Road	Roseville	Placer
107	2025 Opportunity Drive	Roseville	Placer
108	1430 Blue Oaks Boulevard	Roseville	Placer
109	1120 Gallaria Boulevard	Roseville	Placer
110	8286 Industrial Avenue	Roseville	Placer
111	86045 Avenue 52	Coachella Valley	Riverside
112	325 North Cota Street	Corona	Riverside
113	44-909 Golf Center Parkway	Indio	Riverside
114	82-314 Market Street	Indio	Riverside
115	11650 Venture Drive	Mira Loma	Riverside
116	3155 Universe Drive	Mira Loma	Riverside
117	14529 Innovation Drive	Moreno Valley/Riverside	Riverside
118	73-600 Dinah Shore Drive	Palm Desert	Riverside
119	3155 Indian Avenue	Perris	Riverside
120	71905 Highway 111	Rancho Mirage	Riverside
121	69-930 Highway 111	Rancho Mirage	Riverside
122	1886 Spruce Street	Riverside	Riverside
123	4133 Fairgrounds	Riverside	Riverside
124	42301 Zevo Drive	Temecula	Riverside
125	43085 Business Park Drive	Temecula	Riverside
126	43300 Business Park Drive	Temecula	Riverside
127	28065 Diaz Road	Temecula	Riverside

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NO.	ADDRESS	CITY	COUNTY
128	31248 Dunham Way	Thousand Palms	Riverside
129	72355 Manufacture Road	Thousand Palms	Riverside
130	Plot 15, Madison Square	Carmichael	Sacramento
131	8470 Elk Grove Boulevard	Elk Grove	Sacramento
132	9370 Studio Court	Elk Grove	Sacramento
133	4401 Hazel Avenue	Fair Oaks	Sacramento
134	11226 Gold Express Drive	Gold River	Sacramento
135	11919 Foundation Place	Gold River	Sacramento
136	3390 Winona Way	N. Highlands (Sacramento)	Sacramento
137	3222 Winona Way	N. Highlands (Sacramento)	Sacramento
138	4550 Roseville Road	North Highlands	Sacramento
139	4558 Roseville Road	North Highlands	Sacramento
140	2421 Mercantile Drive	Rancho Cordova	Sacramento
141	2419 Mercantile Drive	Rancho Cordova	Sacramento
142	10060 Mills Station Road	Rancho Cordova	Sacramento
143	4170 Truxel Road	Sacramento	Sacramento
144	1635 Main Avenue	Sacramento	Sacramento
145	1312 W. Striker Avenue	Sacramento	Sacramento
146	1120 Blumenfeld Drive	Sacramento	Sacramento
147	1001 Fee Drive	Sacramento	Sacramento
148	16600 Koala Road	Adelanto	San Bernardino
149	10681 Business Drive	Fontana	San Bernardino
150	5450 East Francis Street	Ontario	San Bernardino
151	5590 Francis Street	Ontario	San Bernardino
152	4450 Lowell Street	Ontario	San Bernardino
153	5055 E. Airport Avenue	Ontario	San Bernardino
154	8535 Oakwood Place	Rancho Cucamonga	San Bernardino
155	315 West Resource Drive	Rialto	San Bernardino
156	12180 Ridgcrest Road	Victorville	San Bernardino
157	Building 22105	Camp Pendleton	San Diego
158	3451 Main Street	Chula Vista	San Diego
159	430 Raleigh Avenue	El Cajon	San Diego
160	1550 Leucadia Boulevard	Encinitas	San Diego
161	480 N. Spruce Street	Escondido	San Diego
162	665 Opper Street	Escondido	San Diego
163	12455 Kerran Street	Poway	San Diego
164	7720 Kenamar Court	San Diego	San Diego
165	9530 Candida Street	San Diego	San Diego
166	9030 Kenamar Drive	San Diego	San Diego
167	7740 Kenamar Court	San Diego	San Diego
168	7803 Othello Avenue	San Diego	San Diego
169	7825 Trade Street	San Diego	San Diego
170	8380 Camino Santa Fe	San Diego	San Diego
171	1004 Cudahy Place	San Diego	San Diego
172	7411 Goen Place	San Diego	San Diego
173	4720 Mission Gorge Place	San Diego	San Diego
174	7560 Convoy Court	San Diego	San Diego
175	2202 Versus Street	San Diego	San Diego
176	9353 Activity Road	San Diego	San Diego
177	5980 Fairmount Avenue	San Diego	San Diego
178	10641 Scripps Summit Court	San Diego	San Diego

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NO.	ADDRESS	CITY	COUNTY
179	1601 Precision Park Lane	San Diego (San Ysidro)	San Diego
180	1560 Linda Vista Drive	San Marcos	San Diego
181	1139 Grand Avenue	San Marcos	San Diego
182	155 De Haro Street	San Francisco	San Francisco
183	1225 6th Street	San Francisco	San Francisco
184	200 Jennings Street	San Francisco	San Francisco
185	17054 So. Harlan Road	Lathrop	San Joaquin
186	11928 & 11900 So. Harlan Road	Lathrop	San Joaquin
187	18300 Harlan Road	Lathrop	San Joaquin
188	619 Nestle Way	Lathrop	San Joaquin
189	701 D'Arcy Road	Lathrop	San Joaquin
190	2303 S. Stockton Boulevard	Lodi	San Joaquin
191	2411 S. Stockton Boulevard	Lodi	San Joaquin
192	2055 Industrial Drive	Stockton	San Joaquin
193	1604 Tillie Lewis Drive	Stockton	San Joaquin
194	1166 S. Wilson Way	Stockton	San Joaquin
195	3601 Navone Road	Stockton	San Joaquin
196	2750 Cherokee Road	Stockton	San Joaquin
197	1771 East Bayshore Road	East Palo Alto	San Mateo
198	1646 W. Carlotti	Santa Maria	Santa Barbara
199	1414 Dempsey Road	Milpitas	Santa Clara
200	1535 Landess Avenue	Milpitas	Santa Clara
201	5095 Almaden Expressway	San Jose	Santa Clara
202	595 Brennan Street	San Jose	Santa Clara
203	1698 Rogers Avenue	San Jose	Santa Clara
204	2880 Bowers Avenue	Santa Clara	Santa Clara
205	2960 Innsbruck Drive	Redding	Shasta
206	540 Stone Road	Benicia	Solano
207	6340-6350 Goodyear Road	Benicia	Solano
208	1995 W. Cordelia Road	Fairfield	Solano
209	154 Brown's Valley Parkway	Vacaville	Solano
210	66 Admiral Callaghan Lane	Vallejo	Solano
211	112 California Street	Vallejo	Solano
212	2000 Lakeville Highway	Petaluma	Sonoma
213	5300 Commerce Boulevard	Rohnert Park	Sonoma
214	301 East Todd Road	Santa Rosa	Sonoma
215	260, 300 East Todd Road	Santa Rosa	Sonoma
216	100 Bicentennial Way	Santa Rosa	Sonoma
217	3801 Pelandale Avenue	Modesto	Stanislaus
218	5260 Pirrone Court	Salida	Stanislaus
219	318 N. Barrett Road	Yuba City	Sutter
220	940 Mulhardt Avenue	Oxnard	Ventura
221	2814 Camino Dos Rios	Thousand Oaks	Ventura
222	2625 Johnson Drive	Ventura	Ventura
223	6086 Nicolle Street	Ventura	Ventura

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