

SUMMONG ISSUED
FILED
San Francisco County Superior Court

SEP - 8 2009

GORDON PARK-LI, Clerk

BY: Elis B...
Deputy Clerk

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CASE MANAGEMENT CONFERENCE SET

SEP - 5 2010 9:00 AM

DEPARTMENT 212

9 Attorneys for Plaintiff,
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN FRANCISCO
12 (Unlimited Jurisdiction)

13 MATEEL ENVIRONMENTAL
14 JUSTICE FOUNDATION,

CASE NO. **09C-09-492164**

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

16 v.

17 RIVER OF GOODS, INC.; HOME
18 DECORATORS COLLECTION, INC.; and
UNIVERSAL FOREST PRODUCTS, INC.

TOXIC TORT/ENVIRONMENTAL

19 Defendants.
20 _____/

21 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

22 INTRODUCTION

23 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
24 failure of defendants RIVER OF GOODS, INC.; HOME DECORATORS COLLECTION, INC.;
25 and UNIVERSAL FOREST PRODUCTS, INC. (hereinafter "Defendants"), to give clear and
26 reasonable warnings to those residents of California, who handle and use stained glass lamps that
27 utilize lead solder, lead came and other leaded parts, (hereinafter referred to as "Leaded Stained
28 Glass Lamps"), that handling and use of these products causes those residents to be exposed to

1 Glass Lamps”), that handling and use of these products causes those residents to be exposed to
2 lead and lead compounds, lead acetate, lead phosphate, and lead subacetate (hereinafter,
3 collectively, “lead”). The types of products to which this Complaint pertains are those types
4 listed in the Product List appended to the Proposition 65 60-Day Notice Letter that is attached to
5 and incorporated by reference into this Complaint. Lead is known to the State of California to
6 cause cancer, birth defects and male and female reproductive toxicity. Defendants distribute,
7 and/or market Leaded Stained Glass Lamps. These products cause exposures to lead and lead
8 compounds, which are chemicals known to the State of California to cause cancer, birth defects
9 and other reproductive harm.

10 2. Defendants market, and/or distribute Leaded Stained Glass Lamps. Defendants
11 intend that residents of California handle and use Leaded Stained Glass Lamps that Defendants
12 market, and/or distribute. When these products are handled and used in their normally intended
13 manner, they expose people to lead. In spite of knowing that residents of California were and are
14 being exposed to these chemicals when they handle and use Leaded Stained Glass Lamps,
15 Defendants did not and do not provide clear and reasonable warnings that these products cause
16 exposure to chemicals known to cause cancer, birth defects and other reproductive harm.

17 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
18 to compel Defendants to bring their business practices into compliance with section 25249.5 et
19 seq. by providing a clear and reasonable warning to each individual who has been and who in the
20 future may be exposed to the above mentioned toxic chemicals from the use of Defendants’
21 products. Plaintiff seeks an order that defendants identify and locate each individual person who
22 in the past has purchased Leaded Stained Glass Lamps and to provide to each such purchaser a
23 clear and reasonable warning that the Leaded Stained Glass Lamps will cause exposures to
24 chemicals known to cause birth defects.

25 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure
26 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known
27 to cause cancer, birth defects and other reproductive harm.

28 PARTIES

1 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION (“Mateel”)
2 is a non-profit organization dedicated to, among other causes, the protection of the environment,
3 promotion of human health, environmental education, and consumer rights. Mateel is based in
4 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a
5 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement
6 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of
7 California are regularly exposed to lead and lead compounds from Leaded Stained Glass Lamps
8 manufactured, distributed or marketed by Defendants and are so exposed without a clear and
9 reasonable Proposition 65 warning.

10 6. Defendants are each a person doing business within the meaning of Health &
11 Safety Code Section 25249.11. Defendants are a businesses that distribute, and/or market Leaded
12 Stained Glass Lamps in California, including the City and County of San Francisco. Distribution
13 and/or marketing of these products in the City and County of San Francisco and/or to people who
14 live in San Francisco, causes people to be exposed to lead and lead compounds while they are
15 physically present in the City and County of San Francisco.

16 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &
17 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a
18 60-day Notice letter, dated March 26, 2009, which Mateel sent to California's Attorney General.
19 Substantively identical letters were sent to every District Attorney in the state, and to the City
20 Attorneys of every California city with a population greater than 750,000, and to each defendant.
21 Attached to the 60-Day Notice Letter sent to each defendant was a summary of Proposition 65
22 that was prepared by California’s Office of Environmental Health Hazard Assessment. In
23 addition, each 60-Day Notice Letter plaintiff sent was accompanied by a Certificate of Service
24 attesting to the service of the 60-Day Notice Letter on each entity which received it. Pursuant to
25 California Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting to the
26 reasonable and meritorious basis for the action was also sent with each 60-Day Notice Letter.
27 Factual information sufficient to establish the basis of the Certificate of Merit was enclosed with
28 the 60-Day Notice letter Mateel sent to the Attorney General.

1 8. Defendants each employ more than ten people.

2 JURISDICTION

3 9. The Court has jurisdiction over this action pursuant to California Health & Safety
4 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court
5 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter 6.6
6 of the Health & Safety Code, which contains the statutes under which this action is brought, does
7 not grant jurisdiction to any other trial court.

8 10. This Court also has jurisdiction over Defendants because each is a business that
9 has sufficient minimum contacts in California and within the City and County of San Francisco.
10 Defendants intentionally availed themselves of the California and San Francisco County markets
11 for Leaded Stained Glass Lamps. It is thus consistent with traditional notions of fair play and
12 substantial justice for the San Francisco Superior Court to exercise jurisdiction over Defendants.

13 11. Venue is proper in this Court because Defendants market their products in and
14 around San Francisco and thus cause people to be exposed to lead and lead compounds while
15 those people are physically present in San Francisco. Liability for Plaintiff's causes of action, or
16 some parts thereof, has accordingly arisen in San Francisco during the times relevant to this
17 Complaint and Plaintiff seeks civil penalties imposed by statute.

18 FIRST CAUSE OF ACTION
19 (Claim for Injunctive Relief)

20 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as
21 if specifically set forth herein, paragraphs 1 through 11, inclusive.

22 13. The People of the State of California have declared by referendum under
23 Proposition 65 (California Health & Safety Code § 25249.5 et seq.) their right "[t]o be informed
24 about exposures to chemicals that cause cancer, birth defects, and reproductive harm."

25 14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates
26 that businesses that knowingly and intentionally expose any individual to a chemical known to
27 the State of California to cause cancer or birth defects must first provide a clear and reasonable
28 warning to such individual prior to the exposure.

1 and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety
2 Code;

3 2. Pursuant to the Second Cause of Action, that Defendants each be assessed a civil
4 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section
5 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of
6 Defendants' distributing or marketing of Leaded Stained Glass Lamps;

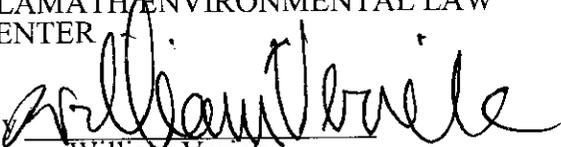
7 3. That Defendants be ordered to identify and locate each individual who purchased
8 Leaded Stained Glass Lamps and provide a warning to each such person that the Leaded Stained
9 Glass Lamps the person purchased will expose that person to chemicals known to cause birth
10 defects.

11 4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to
12 Plaintiff the attorneys fees and costs it incurred in bringing this enforcement action.

13 5. For such other relief as this court deems just and proper.

14 Dated: September 1, 2009

15 KLAMATH ENVIRONMENTAL LAW
16 CENTER

17 By 

18 William Verick
19 Attorney for Plaintiff
20 Mateel Environmental Justice Foundation
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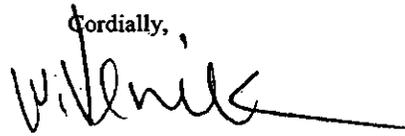


March 26, 2009

EDWARD G. WEIL
DEPUTY ATTORNEY GENERAL
OFFICE OF THE ATTORNEY GENERAL
P.O. BOX 70550
OAKLAND CA 94612-0550

Greetings:

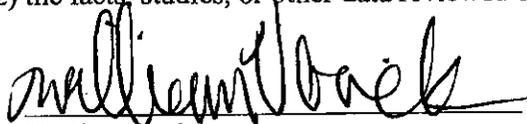
This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the private businesses listed on the attached service list have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents come into contact with products that are, or that utilize components made from, leaded stained glass (hereinafter "leaded stained glass") A list of specific examples of the specific types of products at issue is attached. Though a specific model or UPC number may be given as an example, this notice pertains to all similar types of leaded stained glass. The solder, came, and other parts used to manufacture this leaded stained glass contains lead and lead compounds ("lead"), which are chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead when they assemble, handle, clean, or otherwise use these products. Lead is transferred from the products to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the product, from oral contact with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucous membrane, ingestion and inhalation routes. The listed businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least March 26, 2006, and will continue every day until the lead is removed from the leaded stained glass, or until clear and reasonable warnings are given. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any leaded stained glass made outside of California, except as to workplaces these companies themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the private businesses and in each of California's 58 counties.

Cordially,

William Verick

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: March 26, 2009

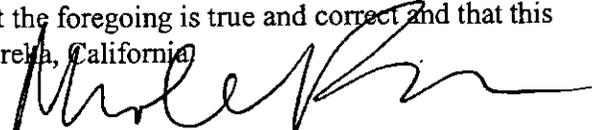

William Verick

This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

CERTIFICATE OF SERVICE

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On March 26, 2009, I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on March 26, 2009, at Eureka, California.


Nicole Frank

PRODUCT LIST

HOME DECORATORS COLLECTION, INC.

CLEAR FLORAL ART GLASS HALF-ROUND MULTI; GOTHAM TIFFANY TABLE LAMP 25" X 19" VINTAGE BRONZE These product descriptions pertain not only to the specific models of the products listed, but also for all units of all models of leaded stained glass.

RIVER OF GOODS, INC.

HOME ACCENTS 14" TABLE LAMP #ROG7509 UPC CODE: 845202 075094 This product description pertains not only to the specific models of the product listed, but also for all units of all models of leaded stained glass.

UNIVERSAL FOREST PRODUCTS, INC.

TIFFANY-STYLE DELICATE POST CAP CEDAR - 4X4 #76718-115791 UPC CODE: 753904 900050 This product description pertains not only to the specific model of the product listed, but also for all units of all models of leaded stained glass.

SERVICE LIST

EDWARD G. WEIL
DEPUTY ATTORNEY GENERAL
OFFICE OF THE ATTORNEY
GENERAL
P.O. BOX 70550
OAKLAND CA 94612-0550

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CITY OF OAKLAND
505 14TH ST 12TH FLOOR
OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY
CITY OF SAN FRANCISCO
CITY HALL ROOM 206
400 VAN NESS
SAN FRANCISCO, CA 94102

OFFICE OF THE CITY ATTORNEY
CITY OF SACRAMENTO
PO BOX 1948
SACRAMENTO, CA 95812-1948

OFFICE OF THE CITY ATTORNEY
CITY OF SAN JOSE
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113

OFFICE OF THE CITY ATTORNEY
CITY OF LOS ANGELES
200 N. MAIN ST.
LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY
CITY OF SAN DIEGO CONSUMER &
ENVIRONMENTAL PROTECTION
1200 THIRD AVENUE, SUITE 700
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF ALAMEDA
1225 FALLON STREET ROOM 900
OAKLAND, CA 94612

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF ALPINE
P.O. BOX 248
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF AMADOR
708 COURT STREET
JACKSON, CA 95642

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF BUTTE
25 COUNTY CENTER DR
OROVILLE, CA 95965

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF CALAVERAS
GOVERNMENT CENTER
891 MOUNTAIN RANCH ROAD
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF COLUSA
547 MARKET STREET
COLUSA, CA 95932

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF CONTRA COSTA
P.O. BOX 670
MARTINEZ, CA 94553

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF DEL NORTE
450 H ST #171
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF EL DORADO
515 MAIN ST.
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF FRESNO
2220 TULARE ST #1000
FRESNO, CA 93721

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF GLENN
P.O. BOX 430
WILLOWS, CA 95988

OFFICE OF THE DISTRICT
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COUNTY OF HUMBOLDT
825 5TH ST.
EUREKA, CA 95501

COUNTY OF IMPERIAL
COURTHOUSE, FLOOR 2
939 W. MAIN ST
EL CENTRO, CA 92243

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF INYO
P.O. DRAWER D
INDEPENDENCE, CA 93526

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF KERN
1215 TRUXTUN AVE. FLOOR 4
BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF KINGS
1400 W. LACEY BLVD.
HANFORD, CA 93230

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF LAKE
255 N. FORBES ST # 424
LAKEPORT, CA 95453

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF LASSEN
220 SOUTH LASSEN ST. STE 8
SUSANVILLE, CA 96130

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COUNTY OF LOS ANGELES
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BUILDING
210 W. TEMPLE ST.
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OFFICE OF THE DISTRICT
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COUNTY OF MADERA
209 W. YOSEMITE AVE.
MADERA, CA 93637

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ATTORNEY
COUNTY OF MARIN
HALL OF JUSTICE #183
SAN RAFAEL, CA 94903

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P.O. BOX 730
MARIPOSA, CA 95338

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ATTORNEY
COUNTY OF MENDOCINO
PO BOX 1000
UKIAH, CA 95482

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ATTORNEY
COUNTY OF MERCED
2222 M ST.
MERCED, CA 95340

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204 SOUTH COURT STREET
ALTURAS, CA 96101

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P.O. BOX 617
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SALINAS, CA 93902

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P.O. BOX 720
NAPA, CA 94559-0720

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110 UNION STREET
NEVADA CITY, CA 95959

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401 CIVIC CENTER DR WEST
SANTA ANA, CA 92701

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COUNTY OF PLACER
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RIVERSIDE, CA 92501

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SACRAMENTO, CA 95814

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COUNTY OF SAN BENITO
419 4TH ST
HOLLISTER, CA 95023

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COUNTY OF SAN BERNARDINO
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SAN BERNARDINO, CA 92415-0004

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COUNTY OF SAN DIEGO
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SAN FRANCISCO, CA 94103

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COUNTY OF SAN JOAQUIN
222 E. WEBER AVE #202
STOCKTON, CA 95202

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COUNTY GOVERNMENT CENTER #450
SAN LUIS OBISPO, CA 93408

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70 W. HEDDING ST.
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701 OCEAN ST. #200
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MODESTO, CA 95354

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P.O. BOX 519
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COUNTY OF TRINITY
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WEAVERVILLE, CA 96093

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COURTHOUSE #224
VISALIA, CA 93291

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COUNTY OF TUOLUMNE
2 S. GREEN ST.
SONORA, CA 95370

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800 SOUTH VICTORIA AVE
VENTURA, CA 93009

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301 SECOND STREET
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YUBA
215 5TH ST.
MARYSVILLE, CA 95901

TERRY COMMERCIAL, CEO
RIVER OF GOODS, INC.
2915 COMMERS DR STE 1500
SAINT PAUL, MN 55121

GIL KEMP, PRESIDENT
HOME DECORATORS COLLECTION, INC.
8920 PERSHALL ROAD
HAZELWOOD, MO 63042

MICHAEL B GLENN, CEO
UNIVERSAL FOREST PRODUCTS, INC
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GRAND RAPIDS, MI 49525