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13 The People of the State of California*

14 *[Additional Counsel Continued on Attachment A]*

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF SAN JOAQUIN

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

19 Plaintiff,

20 v.

21 **99 Cents ONLY STORES LLC,
22 a California limited liability company; and
23 DOES 1 through 25, inclusive,**

24 Defendants.

25 Case No. 39-2014-00319949-CU-TT-STK

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

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

*Exempt from fees per
Government Code §6103*

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

31 **PLAINTIFF**

32 1. The People bring this action and by and through Nancy E. O'Malley, District
33 Attorney of Alameda County; Michael L. Ramsey, District Attorney of Butte County; Mark A.
34 Peterson, District Attorney of Contra Costa County; Elizabeth A. Egan, District Attorney of
35 Fresno County; Lisa S. Green, District Attorney of Kern County; Greg Strickland, District
36 Attorney of Kings County; Michael N. Feuer, City Attorney of Los Angeles; Jackie Lacey,
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1 District Attorney of Los Angeles County; Michael R. Keitz, District Attorney of Madera
2 County; Larry D. Morse II, District Attorney of Merced County; Dean D. Flippo, District
3 Attorney of Monterey County; Tony Rackauckas, District Attorney of Orange County; R. Scott
4 Owens, District Attorney of Placer County; Paul Zellerbach, District Attorney of Riverside
5 County; Jan Scully, District Attorney of Sacramento County; Michael A. Ramos, District
6 Attorney of San Bernardino County; Jan Goldsmith, City Attorney of San Diego; Bonnie M.
7 Dumanis, District Attorney of San Diego County; James P. Willett, District Attorney of San
8 Joaquin County; Dan Dow, District Attorney of San Luis Obispo County; Joyce E. Dudley,
9 District Attorney of Santa Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara
10 County; Stephen Carlton, District Attorney of Shasta County; Krishna A. Abrams, District
11 Attorney of Solano County; Jill R. Ravitch, District Attorney of Sonoma County; Birgit A.
12 Fladager, District Attorney of Stanislaus County; Amanda Hopper, District Attorney of Sutter
13 County; Tim Ward, District Attorney of Tulare County; Gregory D. Totten, District Attorney of
14 Ventura County (collectively "Prosecutors").

15 2. Pursuant to Health and Safety Code section 25182, the Prosecutors may bring a
16 civil action in the name of the People of the State of California to enjoin any violation of
17 Chapter 6.5 of Division 20 of the Health and Safety Code (hereinafter "Chapter 6.5") and to
18 seek civil penalties for violations of the provisions of Chapter 6.5.

19 3. Pursuant to Health and Safety Code sections 25515.6 and 25515.7, the
20 Prosecutors may bring a civil action in the name of the People of the State of California to
21 enjoin any violation of Health and Safety Code sections 25507 to 25508, inclusive, and sections
22 25511 to 25519 inclusive, of Chapter 6.95 of Division 20 of the Health and Safety Code
23 (hereinafter "Chapter 6.95").

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

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1 informed and believe, and based thereon allege that, at all relevant times, 99 Cents Only Stores
2 controlled, managed, directed and was responsible for the operations of the California Facilities,
3 and/or aided and abetted, managed, directed or acted in concert with persons who exercised
4 control over those operations. The People are informed and believe, and based thereon allege,
5 that at all relevant times, 99 Cents Only Stores was legally responsible for all acts and
6 omissions of its officers, directors, agents, employees, contractors, vendors, affiliates, and/or
7 representatives relating to the management of hazardous materials and hazardous waste, and
8 medical waste, at the California Facilities, and/or that 99 Cents Only Stores failed to take
9 appropriate steps to prevent and/or correct the violations alleged herein despite having power,
10 authority and notice sufficient to do so.

11 11. 99 Cents Only Stores is a “person,” as defined in Health and Safety Code
12 sections 25118 and 117745 and Business & Professions Code section 17201, and a “business,”
13 as defined in Health and Safety Code section 25501, subdivision (c).

14 12. When reference is made herein to any act or omission of 99 Cents Only Stores,
15 such allegation shall include the act or omission of the owners, officers, directors, agents,
16 employees, contractors, vendors, affiliates, and/or representatives of 99 Cents Only Stores,
17 engaged in said act or omission.

18 13. The identities of DOES 1 – 25 are unknown to Plaintiff at this time. At such time
19 as the identities of DOE Defendants become known, Plaintiff will amend this Complaint
20 accordingly. DOES 1 – 25 are, and at all times relevant to the claims in this Complaint were,
21 legally responsible for compliance with the provisions of California Health and Safety Code
22 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
23 implementing regulations, and sections 117600, *et seq.*, in connection with the ownership and/or
24 operation of the California Facilities. 99 Cents Only Stores and DOES 1 – 25 are collectively
25 referred to herein as “Defendants.”

26 14. At all times relevant hereto, DOES 1 – 25 were in a position of responsibility
27 allowing them to influence corporate policies or activities with respect to 99 Cents Only Stores
28 compliance with California environmental laws and regulations at the California Facilities, and

1 had, by reason of their position in the limited liability company, responsibility and authority
2 either to prevent in the first instance, or promptly to correct, the violations complained of
3 herein, but failed to do so. In addition to any direct personal liability of these individuals,
4 DOES 1 – 25 also are personally liable under the “responsible corporate officer doctrine” for
5 violations of law committed by 99 Cents Only Stores as alleged herein.

6 **JURISDICTION AND VENUE**

7 15. Venue is proper in this County pursuant to Health and Safety Code sections
8 25183 and 25515.6, and Business and Professions Code sections 17200, *et seq.*, in that certain
9 of the violations alleged in the Complaint occurred in the County of San Joaquin and throughout
10 the State of California. This Court has jurisdiction pursuant to Article 6, section 10 of the
11 California Constitution and Code of Civil Procedure section 393.

12 16. Plaintiff and 99 Cents Only Stores have entered into a series of agreements to toll
13 any applicable statutes of limitation. As a result of these agreements, the period of time from
14 September 3, 2013, through August 31, 2014, inclusive, a total of 363 days (the “Tolling
15 Period”) will not be included in computing the time limited by any statutes of limitation
16 applicable to the claims covered by the tolling agreement.

17 **STATUTORY AND REGULATORY BACKGROUND**

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

27 18. The HWCL is the California analog of the Federal Resource Conservation and
28 Recovery Act, 42 U.S.C. section 6901, *et seq.* (“RCRA”). Pursuant to state and federal law, the

1 California Department of Toxic Substances Control (“DTSC”) administers the HWCL in lieu of
2 federal administration of RCRA in California. (See Health & Saf. Code, § 25101, subdivision
3 (d).) Federal law prohibits California from imposing “any requirements less stringent than
4 those authorized under [RCRA].” (42 U.S.C. § 6929.)

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

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

11 21. The State of California has enacted a comprehensive statutory and regulatory
12 framework for the notification, handling, training and spill/release reporting of hazardous
13 materials. This framework is contained in Chapter 6.95 of Division 20 of the Health and Safety
14 Code, sections 25500, *et seq.*, and its implementing regulations, known as the Hazardous
15 Materials Release Response Plans and Inventory Law. In order to better inform the public and
16 to assist emergency responders, Chapter 6.95 has, for over twenty (20) years, mandated that
17 basic information on the location, type, quantity, and the health risks of hazardous materials
18 handled, used, stored, or disposed of in the State, which could be accidentally released into the
19 environment. be made available to firefighters, health officials, planners, public safety officers,
20 health care providers, regulatory agencies and other interested persons.

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

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1 **ENFORCEMENT AUTHORITY**

2 23. Section 25189 of the Health and Safety Code imposes civil liability for any
3 negligent or intentional violation of the HWCL, or for any violation of any permit, rule,
4 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section
5 25189.2 of the Health and Safety Code is an alternative strict liability provision, which creates
6 liability for any violation of the HWCL, or for any violation of any permit, rule, regulation,
7 standard, or requirement issued or promulgated pursuant to the HWCL.

8 24. Section 118345 of the Health and Safety Code imposes civil liability for any
9 violation of the MWMA, for violation of any order issued pursuant to section 118330 of the
10 Health and Safety Code, or for any violation of a regulation promulgated pursuant to the
11 MWMA.

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

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

17 27. Health and Safety Code sections 25181 and 25184 authorize the Court to issue
18 an order that enjoins any ongoing or potential violation of the HWCL, or of any applicable rule,
19 regulation, permit, standard, requirement, or order issued or promulgated pursuant to the
20 HWCL.

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

23 29. Health and Safety Code section 118325 authorizes the Court to issue an order
24 that enjoins any ongoing or potential violation of the MWMA.

25 30. Health and Safety Code sections 25184, 25515.8, and 118325 provide that in
26 civil actions brought pursuant to the HWCL, Chapter 6.95, or MWMA, respectively, in which
27 an injunction or temporary restraining order is sought, it shall not be necessary for the People to
28 allege or prove at any stage of the proceeding that irreparable damage will occur should the

1 temporary restraining order, preliminary injunction, or permanent injunction not be issued, or
2 that the remedy at law is inadequate, and the temporary restraining order, preliminary
3 injunction, or permanent injunction shall issue without such allegations and without such proof.

4 **GENERAL ALLEGATIONS**

5 31. At all times relevant hereto and continuing from and after the date of filing of
6 this Complaint, Defendants owned and/or operated, and continue to own and/or operate, and are
7 responsible for acts and/or omissions committed at, over 250 California Facilities throughout
8 California, including retail stores and regional distribution centers. At all times relevant hereto
9 and continuing from and after the date of filing of this Complaint, Defendants, and each of
10 them, handled at the California Facilities enormous volumes of hazardous materials including,
11 but not limited to, over-the-counter medications, bleaches, batteries, electronic devices,
12 ignitable liquids, aerosol products, oven cleaners and various other cleaning agents, and other
13 ignitable, reactive, toxic, corrosive, and biohazard materials. Most of those hazardous materials
14 are sold to the public in the ordinary course of business. However, at all times relevant hereto
15 and continuing from and after the date of filing of this Complaint, hazardous materials handled
16 by Defendants at the California Facilities were and are rendered unsalable and unusable for their
17 intended purpose as the result of spillage, breakage, expiration of sell-by dates, contamination,
18 damage to containers or labeling, and other causes, and must be handled and disposed of as
19 hazardous waste in compliance with the HWCL.

20 32. At all times relevant to this Complaint, Defendants, and each of them, are and
21 were responsible for the operation of the California Facilities. At all times relevant to this
22 Complaint, Defendants, and each of them, were aware of, established, implemented, managed,
23 directed, approved, ratified and/or controlled the hazardous materials, medical waste, and
24 hazardous waste management activities, policies and procedures at each of the California
25 Facilities. At all times relevant to this Complaint, Defendants' actions and/or omissions, as part
26 of a continuing course of conduct, are or were the legal cause of the violations alleged herein,
27 and Defendants, and each of them, reasonably could have taken action to prevent violations and
28 comply with applicable laws and regulations.

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

4 34. Plaintiff is informed and believes and thereupon alleges that Defendants, and
5 each of them, have violated provisions of the following statutes, including implementing
6 regulations associated with each of the statutes and any related permit, rule, standard, or
7 requirement issued or promulgated pursuant to these statutes, at the California Facilities within
8 the time period applicable to this action: Chapter 6.5 of the Health and Safety Code, sections
9 25100, *et seq.*; Chapter 6.95 of the Health and Safety Code, sections 25500, *et seq.*; Health and
10 Safety Code sections 117600, *et seq.*; Business and Professions Code sections 17200, *et seq.*;
11 and in addition, to the period of time tolled pursuant to Tolling Agreements referenced in
12 paragraph 16.

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

- 18 a. Disposed of, or caused the disposal of, hazardous waste at a point not authorized,
19 in violation of Health and Safety Code sections 25189 and 25189.2, including in
20 drains at California Facilities, onto the surface or subsurface of the ground at
21 unauthorized locations, and at landfills not authorized to accept
22 commercial/retail hazardous waste and other locations not authorized to receive
23 hazardous waste;
- 24 b. Transported hazardous waste to unauthorized locations, including, without
25 limitation, 99 Cents Only Stores distribution centers and reverse logistics
26 vendors, in violation of California Code of Regulations, title 22, section
27 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 California Department
3 of Toxic Substances Control (“DTSC”), in violation of Health and Safety Code
4 section 25163;
- 5 d. Knowingly caused to be deposited, without the permission of the owner,
6 hazardous substances upon the land of another, in violation of Penal Code
7 section 374.8, subdivision (b);
- 8 e. Failed to determine if a generated waste including, but not limited to, items
9 returned by customers to California Facilities, and wastes generated at California
10 Facilities via spills, container breakage, and other means, were hazardous wastes,
11 as required by Title 22 of the California Code of Regulations section 66262.11,
12 and, where such waste was hazardous, failed to handle the hazardous waste in
13 accordance with the requirements of Chapter 6.5 of the Health and Safety Code
14 and its implementing regulations in Title 22 of the California Code of
15 Regulations, including, but not limited to, section 66265.172 (compatible
16 contents), and section 66265.177 (placing incompatible waste streams in the
17 same container);
- 18 f. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of
19 the California Code of Regulations section 66260.200;
- 20 g. Failed to determine if hazardous waste had to be treated before it could be land
21 disposed by testing the waste or using generator knowledge of the waste, in
22 violation of Title 22 of the California Code of Regulations section 66268.7,
23 subdivision (a);
- 24 h. Failed to keep records of any test results, waste analysis, or other determinations
25 made in accordance with section 66262.11 for at least three (3) years from the
26 date that the waste was last sent to on-site or off-site treatment, storage, or
27 disposal, in violation of Title 22 of the California Code of Regulations, section
28 66262.40(c);

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- 3 i. Failed to properly manage, identify the accumulation start date, and properly
- 4 label containers of hazardous waste at California Facilities, in violation of
- 5 California Code of Regulations, Title 22, section 66262.34;
- 6 j. Failed to properly manage, mark, and store hazardous waste aerosol cans, in
- 7 violation of section 25201.16 of the California Health and Safety Code;
- 8 k. Failed to use and/or maintain containers holding hazardous waste at the
- 9 California Facilities so as to prevent leaks, in violation of Title 22 of the
- 10 California Code of Regulations section 66265.173 and Code of Federal
- 11 Regulations section 265.171;
- 12 l. Failed to keep containers of hazardous waste closed and/or sealed, except when
- 13 removing or adding hazardous waste, in violation of Title 22 of the California
- 14 Code of Regulations section 66265.173;
- 15 m. Failed to comply with employee training obligations pertaining to handling of
- 16 hazardous waste at California Facilities, in violation of California Code of
- 17 Regulations, Title 22, section 66265.16.
- 18 n. Failed to obtain and keep current all required hazardous waste generator permits
- 19 required by county and local ordinances;
- 20 o. Treated, stored, disposed of, transported, and offered for transportation,
- 21 hazardous waste without having received and used a proper identification
- 22 number from the U.S. Environmental Protection Agency or DTSC for the
- 23 originating facility, in violation of Title 22 of the California Code of Regulations
- 24 section 66262.12, subdivision (a);
- 25 p. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous
- 26 waste facilities permit, in violation of Health and Safety Code section 25201(a)
- 27 and Title 22 of the California Code of Regulations section 66270.1;

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3 q. Stored hazardous waste onsite beyond the time permitted by law at a facility
4 which did not have a hazardous waste storage permit from DTSC, in violation of
5 Title 22 of the California Code of Regulations section 66262.34, and California
6 Health and Safety Code section 25123.3, subdivision (h);

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

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

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

26 u. Failed to submit an Exception Report to DTSC after the generator did not receive
27 a copy of the manifest with the handwritten signature of the owner or operator of
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- 1 the designated facility which was to receive the hazardous waste within forty-
2 five (45) days of the date the waste was accepted by the initial transporter, in
3 violation of Title 22 of the California Code of Regulations section 66262.42,
4 subdivision (b) and Health and Safety Code section 25123.3(h)(2);
- 5 v. Failed to comply with the requirements of Title 40 of the Code of Federal
6 Regulations, section 262.34, subdivisions (d) – (f), requiring generators to
7 designate an employee at all times as the emergency coordinator and post the
8 required information listed on Section 262.34, subdivision (d)(5)(i) - (iv), in
9 violation of Title 22 of the California Code of Regulations section 66262.34,
10 subdivision (d)(2);
- 11 w. Failed to keep a copy of each manifest signed in accordance with Title 22 of the
12 California Code of Regulations section 66262.23, subdivision (a), for three (3)
13 years or until the generator received a signed copy from the designated facility
14 which received the hazardous waste, in violation of Title 22 of the California
15 Code of Regulations section 66262.40, subdivision (a);
- 16 x. Failed to properly manage, mark, and store universal waste, in violation of Title
17 22 of the California Code of Regulations sections 66273.13 - 66273.16 and
18 sections 66273.33 – 66273.36;
- 19 y. Failed to keep a record with the information required by section 66273.39,
20 subdivisions (a)(1) – (3), of each shipment of universal waste received at the
21 universal waste handler’s facility, in violation of Title 22 of the California Code
22 of Regulations section 66273.39;
- 23 z. Failed to prepare and maintain hazardous waste manifests, in violation of
24 California Code of Regulations, Title 22, sections 66260, *et seq.*;
- 25 aa. Failed to treat returned or discarded non-empty aerosol cans at California
26 Facilities as universal waste or hazardous waste, in violation of California Code
27 of Regulations, Title 22, Chapter 23, sections 66273.1, *et seq.*;
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- bb. Failed to label containers of hazardous waste before transporting hazardous waste from California Facilities, in violation of California Code of Regulations, Title 22, section 66262.31;
- cc. Failed to implement, maintain and comply with an employee training program meeting the requirements of Health and Safety Code section 25505, subdivision (a), and Title 19 of the California Code of Regulations section 2732, pertaining to hazardous materials, and business and area plans;
- dd. Failed to implement and maintain a business emergency plan for emergency response to a release or threatened release of hazardous materials, in violation of Health and Safety Code section 25507;
- ee. Failed to implement, maintain or to submit to the administering agency (as defined in Health and Safety Code sections 25501 and 25502), a complete hazardous materials business plan for each California Facility, in violation of Health and Safety Code sections 25505 and 25508, and section 2729 of Title 19 of the California Code of Regulations;
- ff. Failed to comply with the California MWMA, Health and Safety Code sections 117600, *et seq.*, by failing to have a Medical Waste Management Plan, failing to retain on file disposal receipts and tracking documents for waste shipped offsite for three (3) years, and improperly storing, transporting, and disposing of pharmaceutical wastes;
- gg. Allowed hazardous waste to remain, after causing its deposit, at a point not authorized, without immediately filing a report of the deposit with the DTSC and complying with any order by the DTSC, in violation of Health & Safety Code sections 25189 subdivision (d) and 25189.2 subdivision (c).
- hh. Disposed of or caused the disposal of hazardous waste at an unauthorized point in violation of Health & Safety Code section 25189.5, subdivision (a).

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

1 **FIRST CAUSE OF ACTION**

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

4 37. Plaintiff realleges paragraphs 1 through 36, inclusive.

5 38. Health and Safety Code sections 25189 and 25189.2 prohibits the disposal, or
6 causing of the disposal, of hazardous waste at a point not authorized under Chapter 6.5. Section
7 25189(c) prohibits intentional and negligent disposal of hazardous waste at an unauthorized
8 point, and 25189.2, subdivision (c) prohibits the disposal of hazardous waste at an unauthorized
9 point as a matter of strict liability.

10 39. Defendants, and each of them, have disposed of and/or caused the disposal of
11 hazardous waste originating from the California Facilities at unauthorized points, in violation of
12 California Health and Safety Code section 25189 and 25189.2.

13 40. Each disposal of hazardous waste at an unauthorized point discovered within five
14 (5) years of commencing this action, in addition to any applicable tolling periods and those set
15 forth in paragraph 16 herein, and each day the waste was allowed to remain at such point
16 without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a
17 separate and additional civil penalty under Health and Safety Code section 25189 or
18 alternatively under section 25189.2.

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

22 **SECOND CAUSE OF ACTION**

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

25 42. Plaintiff realleges paragraphs 1 through 41, inclusive.

26 43. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized
27 transportation, or causing the transportation, of hazardous waste. Section 25163 prohibits the
28 transportation of hazardous waste without a valid registration from DTSC. California Code of
Regulations, Title 22, section 66263.23, subdivision (b) prohibits the transportation of

1 hazardous waste to a location not permitted or otherwise authorized by the DTSC to receive the
2 waste.

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

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

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

15 **THIRD CAUSE OF ACTION**

16 (Violations of Hazardous Waste Handling and Storage Requirements)
17 (Health & Safety Code Chapter 6.5 and Implementing Regulations §§ 25100, *et seq.*,
and 25189 and 25189.2; Cal. Code Regs., Title 22, § 66260.1, *et seq.*)

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

19 48. Health and Safety Code sections 25189 and 25189.2 prohibit improper hazardous
20 waste handling and storage under Chapter 6.5.

21 49. Defendants, and each of them, have violated and continue to violate the
22 hazardous waste handling and storage requirements of Chapter 6.5 of Division 20 of the Health
23 and Safety Code sections 25100, *et seq.*, and its implementing regulations at Title 22 of the
24 California Code of Regulations, sections 66260.1, *et seq.*, applicable to the California Facilities
25 by virtue of the acts alleged above, and incorporated herein by reference, and unless enjoined by
26 order of the Court, Defendants, and each of them, may or will continue in the course of conduct
27 as alleged herein.
28

1 required hazardous materials response plans and inventories and training and updating
2 requirements of Chapter 6.95 of Division 20 of the Health and Safety Code sections 25500, *et*
3 *seq.*, and its implementing regulations, at the California Facilities, as described in the People's
4 prayer for relief.

5 **FIFTH CAUSE OF ACTION**

6 (Disposal of Untreated Medical Waste)
7 (Health & Safety Code §§ 118215 subdivision (a) and 118222)

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

9 58. Health and Safety Code sections 118215, subdivision (a) and 118222, prohibit
10 the disposal of medical waste without first treating such waste by a method specified in the
11 MWMA.

12 59. Defendants, and each of them, have disposed of medical waste originating from
13 the California Facilities without first properly treating it, in violation of California Health and
14 Safety Code section 118215, subdivision (a), and unless enjoined by order of the Court,
15 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

16 60. Each act of disposal of medical waste without proper treatment that the People
17 discovered within three (3) years of commencing this action, in addition to any applicable
18 tolling periods and those set forth in paragraph 16 herein, subjects Defendants to a separate and
19 additional civil penalty under Health and Safety Code section 118345, subdivision (b).

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

23 **SIXTH CAUSE OF ACTION**

24 (Violations of Unfair Competition Laws)
25 (Business & Professions Code sections 17200, *et seq.*)

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

27 63. Within four (4) years of commencing this action, in addition to any applicable
28 tolling periods and those set forth in paragraph 16 herein, Defendants, and each of them, have
engaged in, and continue to engage in, unlawful acts, omissions, and practices that constitute
unfair competition within the meaning of Business and Professions Code sections 17200

1 through 17208, including but not limited to, the acts or omissions and practices alleged in the
2 First through Fifth Causes of Action, above, and unless enjoined by order of the Court,
3 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

4 64. In addition to the acts alleged in the First through Fifth Causes of Action above,
5 Defendants, and each of them, have engaged in, and continue to engage in, the following
6 unlawful acts, omissions, and practices that constitute unfair competition within the meaning of
7 Business and Professions Code sections 17200 *et seq.*: knowingly caused hazardous substances
8 to be deposited into or upon any road, street, highway, alley, or railroad right-of-way, or upon
9 the land of another, without the permission of the owner, or into the waters of this state in
10 violation of California Penal Code section 374.8.

11 65. Each and every separate act constitutes an unlawful and/or unfair business
12 practice. Each day that Defendants, and each of them, engaged in each separate unlawful act,
13 omission or practice is a separate and distinct violation of Business and Professions Code
14 section 17200.

15 66. Pursuant to Business and Professions Code section 17206, Defendants, and each
16 of them, are liable for civil penalties for each and every separate act of unfair competition as
17 alleged herein.

18 67. Defendants, and each of them, must be immediately and permanently enjoined,
19 pursuant to Business and Professions Code section 17203, from engaging in acts or practices
20 that, as alleged in this Complaint, violate Chapter 6.5 and/or 6.95 of Division 20 of the Health
21 and Safety Code and their implementing regulations, Health and Safety Code section 117600, *et*
22 *seq.*, and county and local ordinances pertaining to hazardous waste generator permits, which
23 thereby constitute unfair competition within the meaning of Business and Professions Code
24 section 17200.

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1 **PRAYER FOR RELIEF**

2 Based on the above, the People request the following relief as to each Defendant:

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

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

9 3. A Permanent Injunction requiring Defendants to comply with those provisions of
10 Health and Safety Code sections 117600, *et seq.*, which Defendants are alleged to have violated;

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

16 5. That the Defendants herein be assessed a civil penalty of TWENTY FIVE
17 THOUSAND DOLLARS (\$25,000.00), for each violation, in an amount according to proof, for
18 their violations of Health and Safety Code section 25189(c) or (b), or alternatively section
19 25189.2(c);

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

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

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

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- 9. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit herein; and
- 10. Such other and further relief as the Court deems just and proper.

Dated: 12/19/14

JAMES P. WILLET, District Attorney of
San Joaquin County, State of California

By: 
CELESTE KAISCH
Deputy District Attorney

ATTACHMENT A

Additional Counsel for the Plaintiff

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EXHIBIT A

EXHIBIT A - California Facilities

	Store	Address	City	County	Zip	Date Opened	Date Closed
1	289	1941 San Pablo Ave.	Berkeley	Alameda	94702	06/19/08	
2	320	41989 Fremont Blvd.	Fremont	Alameda	94538	03/25/10	
3	217	20882 Mission Blvd.	Hayward	Alameda	94541	06/11/04	
4	278	1440 7th Street	Oakland	Alameda	94607	01/17/08	
5	180	699 Lewelling Blvd., #50	San Leandro	Alameda	94579	07/31/03	
6	256	2560 Notre Dame Blvd.	Chico	Butte	95928	02/08/07	08/30/13
7	228	2515 Somersville Rd.	Antioch	Contra Costa	94509	10/06/05	
8	247	1701 A Willow Pass Rd.	Concord	Contra Costa	94520	07/20/06	
9	201	4665 Clayton Rd.	Concord	Contra Costa	94521	12/20/03	
10	275	620 San Pablo Ave.	Pinole	Contra Costa	94564	02/21/08	
11	297	3600 Klose Way	Richmond	Contra Costa	94804	09/25/08	
12	138	770 W. Shaw	Clovis	Fresno	93612	11/17/02	
13	235	1520 N. First Street	Fresno	Fresno	93703	05/25/06	
14	271	3110 N. West Avenue	Fresno	Fresno	93705	08/17/07	
15	328	4170 West Shaw	Fresno	Fresno	93722	03/24/11	
16	204	4979 Kings Canyon Blvd.	Fresno	Fresno	93727	11/20/03	
17	154	6036 N. First Street	Fresno	Fresno	93710	01/24/02	
18	348	2680 Jensen Ave.	Sanger	Fresno	93657	08/23/12	
19	238	401 E. 2nd Street	Calexico	Imperial	92231	06/08/06	
20	267	2101 Imperial Blvd.	El Centro	Imperial	92243	04/10/08	
21	258	1121 Olive Drive	Bakersfield	Kern	93308	10/04/07	
22	146	1501 White Lane	Bakersfield	Kern	93307	07/26/01	
23	129	2682 Mt. Vernon Ave.	Bakersfield	Kern	93306	02/22/01	
24	128	4200 Ming Ave.	Bakersfield	Kern	93309	03/22/01	
25	332	626 Cecil Ave.	Delano	Kern	93215	03/29/12	
26	290	550 N. 11th Ave.	Hanford	Kings	93230	11/08/09	
27	184	2810 W. Alhambra Road	Alhambra	Los Angeles	91801	06/26/03	
28	69	140 E. Duarte Rd.	Arcadia	Los Angeles	91006	06/25/98	
29	321	11732 South St.	Artesia	Los Angeles	90701	12/10/08	
30	90	307 N. Citrus	Azusa	Los Angeles	91702	09/09/99	
31	72	14151 Ramona Blvd.	Baldwin Park	Los Angeles	91706	09/29/98	
32	152	14317 Clark Avenue	Bellflower	Los Angeles	90706	09/27/01	
33	336	1327 E. Huntington Dr.	Buena Vista	Los Angeles	91010	03/15/12	
34	111	2407 W. Victory Blvd.	Burbank	Los Angeles	91506	08/24/00	
35	36	20914 Sherman Way	Canoga Park	Los Angeles	91303	06/18/92	
36	378	619 E. University Dr.	Carson	Los Angeles	90746	02/13/14	
37	197	1320 East Alondra	Compton	Los Angeles	90221	02/26/04	
38	103	321 N. Vincent Ave.	Covina	Los Angeles	91722	01/11/00	

EXHIBIT A - California Facilities

	Store	Address	City	County	Zip	Date Opened	Date Closed
39	340	543 N. Azusa Ave.	Covina	Los Angeles	91722	11/26/12	
40	67	11916 Paramount Blvd.	Downey	Los Angeles	90241	01/04/99	
41	377	300 Richmond St.	El Segundo	Los Angeles	90245	09/26/13	
42	52	11114 Ramona	El Monte	Los Angeles	91731	09/26/96	
43	199	15505 S. Normandie Ave.	Gardena	Los Angeles	90247	09/25/03	
44	54	6401 San Fernando	Glendale	Los Angeles	91201	05/28/97	
45	55	17034 Chatsworth	Granada Hills	Los Angeles	91344	12/19/96	
46	193	1120 Hacienda Blvd.	Hacienda Heights	Los Angeles	91745	06/19/03	
47	46	12125 Carson Blvd.	Hawaiian Gardens	Los Angeles	90716	06/14/95	
48	19	11811 Hawthorne	Hawthorne	Los Angeles	90250	06/10/88	
49	6	13023 Hawthorne	Hawthorne	Los Angeles	90250	01/10/84	
50	44	2566 E. Florence	Huntington Park	Los Angeles	90255	10/27/94	
51	33	6124 Pacific Blvd.	Huntington Park	Los Angeles	90255	06/30/92	
52	364	2762 Imperial Hwy.	Inglewood	Los Angeles	90303	06/20/13	
53	57	3220 W. Century Blvd.	Inglewood	Los Angeles	90303	05/12/96	
54	37	14540 E. Leffingwell	La Mirada	Los Angeles	90638	08/12/92	
55	56	1617 Hacienda Blvd.	La Puente	Los Angeles	91744	11/26/97	
56	246	1504 Foothill Blvd.	La Verne	Los Angeles	91750	04/05/09	
57	58	4929 Woodruff Ave.	Lakewood	Los Angeles	90713	02/27/97	
58	325	1030 E. Avenue J	Lancaster	Los Angeles	93535	02/10/12	
59	70	44601 Valley Central Way	Lancaster	Los Angeles	93534	08/25/05	
60	34	14901 Hawthorne	Lawndale	Los Angeles	90260	12/02/92	
61	311	2159-2167 Pacific Coast	Lomita	Los Angeles	90717	09/08/10	
62	173	1190 E. Carson St.	Long Beach	Los Angeles	90807	10/17/02	
63	355	1851 Willow St.	Long Beach	Los Angeles	90755	11/10/13	
64	251	2012 Long Beach Blvd.	Long Beach	Los Angeles	90806	11/16/06	
65	38	5599 Atlantic Blvd.	Long Beach	Los Angeles	90805	08/13/93	
66	114	12717-41 W. Washington	Los Angeles	Los Angeles	90066	11/30/00	
67	13	1516W. Pico	Los Angeles	Los Angeles	90015	10/28/87	
68	51	2606 North Broadway	Los Angeles	Los Angeles	90031	08/26/96	
69	59	3451 Whittier Blvd.	Los Angeles	Los Angeles	90023	03/27/97	
70	83	3600 W. Sunset Blvd.	Los Angeles	Los Angeles	90026	04/03/99	
71	62	422 E. Washington Blvd.	Los Angeles	Los Angeles	90019	07/24/97	
72	63	5270 Sunset Blvd.	Los Angeles	Los Angeles	90027	08/28/97	
73	16	601 S. Fairfax Ave.	Los Angeles	Los Angeles	90036	06/16/89	
74	41	6121 Wilshire Blvd.	Los Angeles	Los Angeles	90048	10/08/94	
75	16B	621 S. Fairfax Ave.	Los Angeles	Los Angeles	90036	TBD	
76	125	6235 York Blvd.	Los Angeles	Los Angeles	90042	01/18/01	

EXHIBIT A - California Facilities

	Store	Address	City	County	Zip	Date Opened	Date Closed
77	135	650 S. Alvarado	Los Angeles	Los Angeles	90057	07/02/02	
78	1	6854 La Tijera Blvd.	Los Angeles	Los Angeles	90045	08/13/82	
79	375	6921 La Tijera Blvd.	Los Angeles	Los Angeles	90045	11/14/13	
80	84	852 N. La Brea	Los Angeles	Los Angeles	90038	04/05/99	
81	130	10821 Long Beach Blvd.	Lynwood	Los Angeles	90262	08/21/03	
82	14	6161 Atlantic Blvd.	Maywood	Los Angeles	90270	05/05/88	
83	3	1521 Beverly Blvd.	Montebello	Los Angeles	90640	04/13/84	
84	126	2441 Via Campo	Montebello	Los Angeles	90640	01/25/01	
85	60	24200 West Lyons	Newhall	Los Angeles	91321	07/05/97	
86	227	8723 Sepulveda Blvd.	North Hills	Los Angeles	91343	07/14/05	
87	230	10911 Victory Blvd.	North Hollywood	Los Angeles	91606	01/26/06	
88	61	12711 Sherman Way	North Hollywood	Los Angeles	91605	06/25/97	
89	40	4304 Lankershim	North Hollywood	Los Angeles	91602	02/17/94	
90	315	6639 Laurel Canyon Blvd.	North Hollywood	Los Angeles	91606	09/16/10	
91	106	8966 Reseda Blvd.	Northridge	Los Angeles	91324	02/17/00	
92	272	110055-11057 Firestone Blvd.	Norwalk	Los Angeles	90650	01/22/09	
93	32	14029 Pioneer Blvd.	Norwalk	Los Angeles	90650	07/25/91	
94	42	8625 Woodman Ave.	Pacoima	Los Angeles	91331	02/17/94	
95	326	38360-B 20th St E	Palmdale	Los Angeles	93550	10/11/02	
96	109	442 W. Ave. "P"	Palmdale	Los Angeles	93551	08/06/00	
97	27	14139 Paramount	Paramount	Los Angeles	90723	09/27/90	
98	98	1720 E. Colorado Blvd.	Pasadena	Los Angeles	91106	07/20/00	
99	31	9535 Whittier Blvd.	Pico Rivera	Los Angeles	90660	06/12/90	
100	82	606 E. Holt Ave.	Pomona	Los Angeles	91767	09/04/99	
101	226	780 East Arrow Hwy.	Pomona	Los Angeles	91767	02/24/05	
102	310	2701 Manhattan Beach Blvd.	Redondo Beach	Los Angeles	90278	08/21/08	
103	47	18215 Sherman Way	Reseda	Los Angeles	91335	01/16/95	
104	112	19033 E. Colima Rd.	Rowland Heights	Los Angeles	91748	06/15/00	
105	343	602 W Arrow Hwy.	San Dimas	Los Angeles	91773	05/31/12	
106	7	442 N. Los Robles	San Marino	Los Angeles	91108	05/21/91	
107	45	938 S. Gaffey	San Pedro	Los Angeles	90731	03/05/95	
108	363	11452 Telegraph Rd.	Santa Fe Springs	Los Angeles	90670	07/25/13	
109	35	2801 Pico Blvd.	Santa Monica	Los Angeles	90405	08/13/92	
110	28	9565 Las Tunas	Temple City	Los Angeles	91780	03/22/90	
111	266	1820 W. 182nd St.	Torrance	Los Angeles	90504	06/28/07	
112	65	5130 190th Street	Torrance	Los Angeles	90504	10/23/97	
113	48	955 W. Sepulveda	Torrance	Los Angeles	90502	03/28/96	
114	330	23300 Valencia Blvd.	Valencia	Los Angeles	91355	11/12/10	

EXHIBIT A - California Facilities

	Store	Address	City	County	Zip	Date Opened	Date Closed
115	81	6755 Van Nuys Blvd.	Van Nuys	Los Angeles	91405	03/18/99	
116	92	241 Lincoln Blvd.	Venice	Los Angeles	90291	01/23/03	
117	76	15345 Whittier Blvd.	Whittier	Los Angeles	90603	06/24/99	
118	283	401 W Anaheim St.	Wilmington	Los Angeles	90744	03/27/08	
119	87	19836 Ventura Blvd.	Woodland Hills	Los Angeles	91364	02/03/00	
120	88	17965 Ventura Blvd.	Encino	Los Angeles	91316	02/10/00	09/24/10
121	191	1333 Country Club Drive	Madera	Madera	93638	05/29/03	
122	292	1870 Bellevue Road	Atwater	Merced	95301	10/23/08	
123	151	1111 W Olive Dr.	Merced	Merced	95348	10/17/02	
124	208	102 E. Laurel Drive	Salinas	Monterey	93906	02/05/04	
125	100	2270 E. Lincoln Ave.	Anaheim	Orange	92806	09/30/99	
126	50	3420 W. Lincoln	Anaheim	Orange	92801	07/25/96	
127	221	1261 W. Central Ave.	Brea	Orange	92821	11/18/04	
128	253	820 East Imperial Hwy.	Brea	Orange	92821	12/14/06	
129	174	2180 Harbor Blvd	Costa Mesa	Orange	92627	09/19/02	
130	327	26542 Towne Centre Dr	Foothill Ranch	Orange	92610	02/17/11	
131	53	1845 N. Orangethorpe	Fullerton	Orange	92833	11/08/96	
132	187	2450 E. Chapman Ave.	Fullerton	Orange	92831	04/03/12	
133	372	11072 Magnolia St.	Garden Grove	Orange	92841	09/19/13	
134	141	12431 Valley View St.	Garden Grove	Orange	92845	01/15/01	
135	5	13061 Harbor Blvd.	Garden Grove	Orange	92843	07/13/84	
136	43	9920 Westminster	Garden Grove	Orange	92844	10/13/95	
137	49	15962 Springdale	Huntington Beach	Orange	92649	08/02/96	
138	75	16672 Beach Blvd.	Huntington Beach	Orange	92647	09/17/98	
139	97	19050 Brookhurst	Huntington Beach	Orange	92646	11/27/00	
140	198	23829 El Toro Rd.	Lake Forest	Orange	92630	06/12/03	
141	341	789 South Tustin Street	Orange	Orange	92866	08/12/03	
142	122	1260 E. Yorba Linda	Placentia	Orange	92670	11/09/00	
143	186	55 Via Pico Plaza	San Clemente	Orange	92672	02/24/05	
144	39	1514 N. Main St.	Santa Ana	Orange	92701	04/16/98	
145	77	2311 S. Bristol St.	Santa Ana	Orange	92704	12/17/98	
146	354	14731 Goldenwest St.	Westminster	Orange	92683	03/14/13	
147	71	1611 Whittier Blvd.	La Habra	Orange	90631	06/30/98	01/09/10
148	385	10261 Fairway Dr.	Roseville	Placer	95678	11/21/13	
149	331	1617 Douglas Blvd.	Roseville	Placer	95661	06/11/10	
150	262	31033 Date Palm Dr.	Cathedral City	Riverside	92234	10/25/07	
151	261	50249 Harrison St. #J	Coachella	Riverside	92236	07/10/08	
152	380	450 N. McKinley St.	Corona	Riverside	92879	11/21/13	

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	Store	Address	City	County	Zip	Date Opened	Date Closed
153	78	725 S. Main St.	Corona	Riverside	91720	10/27/98	
154	108	3385 W. Florida Ave.	Hemet	Riverside	92545	06/04/00	
155	119	79840 Hwy. 111	La Quinta	Riverside	92253	12/15/05	
156	234	18286 Collier Avenue	Lake Elsinore	Riverside	92530	08/31/06	
157	371	26100 Newport Rd.	Menifee	Riverside	92586	11/21/13	
158	317	12530 Day St.	Moreno Valley	Riverside	92553	04/10/03	
159	86	24899 Alessandro Blvd.	Moreno Valley	Riverside	92553	09/29/99	
160	127	25270 Madison	Murrieta	Riverside	92562	01/11/01	
161	338	34660 Monterey Ave.	Palm Desert	Riverside	92211	09/15/11	
162	216	72845 A & B Highway 111	Palm Desert	Riverside	92260	09/19/04	
163	104	3477 Arlington Ave.	Riverside	Riverside	92506	08/17/00	
164	383	6230 Van Buren Blvd.	Riverside	Riverside	92503	10/17/13	
165	285	8900 Limonite Ave.	Riverside	Riverside	92509	06/26/08	
166	134	9915 Magnolia Ave.	Riverside	Riverside	92503	12/13/01	
167	334	40355 Winchester Rd.	Temecula	Riverside	92591	08/11/09	
168	176	6431 Fair Oaks Blvd.	Carmichael	Sacramento	95608	05/02/12	
169	233	941.5 Madison Avenue	Orangevale	Sacramento	95662	11/10/05	
170	160	2868 Zinfandel Drive	Rancho Cordova	Sacramento	95670	06/02/06	
171	175	2224 El Camino Ave.	Sacramento	Sacramento	95821	03/20/03	
172	183	2351 Northgate Blvd.	Sacramento	Sacramento	95833	01/23/03	
173	168	4319 Elkhorn Blvd.	Sacramento	Sacramento	95842	08/02/08	
174	352	4440 Florin Rd.	Sacramento	Sacramento	95823	05/30/13	
175	239	4909 Auburn Blvd.	Sacramento	Sacramento	95841	06/01/06	
176	237	5930 Stockton Blvd.	Sacramento	Sacramento	95824	04/06/06	
177	209	8387 Folsom Blvd.	Sacramento	Sacramento	95826	03/31/04	
178	345	1481 N. La Candena Dr.	Colton	San Bernardino	92324	09/27/12	
179	254	19201 Bear Valley Road	Apple Valley	San Bernardino	92308	05/15/08	
180	291	1308 E. Main St.	Barstow	San Bernardino	92311	04/24/08	
181	149	12170 Central Ave.	Chino	San Bernardino	91710	06/01/12	
182	96	4050 Chino Hills	Chino	San Bernardino	91710	07/29/99	
183	240	1080 S. Mount Vernon Ave.	Colton	San Bernardino	92324	07/20/06	
184	89	9255 Sierra Ave.	Fontana	San Bernardino	92335	07/22/99	
185	281	14073 Main St., Suite 108	Hesperia	San Bernardino	92345	09/23/07	
186	362	17255 Main St.	Hesperia	San Bernardino	92345	03/28/13	
187	148	5200 Moreno	Montclair	San Bernardino	91763	10/25/01	
188	64	430 N. Mountain	Ontario	San Bernardino	91761	09/25/97	
189	365	10848 Foothill Blvd.	Rancho	San Bernardino	91701	07/11/13	
190	110	9640 Baseline Rd.	Rancho	San Bernardino	91701	09/03/00	

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	Store	Address	City	County	Zip	Date Opened	Date Closed
191	181	1678 W. Redlands Blvd.	Redlands	San Bernardino	92373	11/03/12	
192	123	1321 W. Foothill Blvd.	Rialto	San Bernardino	92376	04/01/10	
193	236	212 W. Baseline Rd.	Rialto	San Bernardino	92376	09/28/06	
194	356	1003 N. Waterman Ave.	San Bernardino	San Bernardino	92410	02/28/13	
195	360	2028 E Highland Ave.	San Bernardino	San Bernardino	92404	07/11/13	
196	68	975-A South "E" Street	San Bernardino	San Bernardino	92408	02/26/98	
197	107	229 E. Foothill Rd.	Upland	San Bernardino	91786	05/18/00	
198	137	12480 Amargosa	Victorville	San Bernardino	92392	06/28/01	
199	93	14670 Seventh St	Victorville	San Bernardino	92392	01/01/03	
200	179	12013 5th Street	Yucaipa	San Bernardino	92399	12/19/02	
201	80	1766 E. Main St.	El Cajon	San Diego	92021	10/12/98	
202	293	2320 Fletcher Parkway	El Cajon	San Diego	92020	11/06/08	
203	169	145 S. El Camino Real	Encinitas	San Diego	92024	09/02/05	
204	357	2010 E. Valley Pkwy.	Escondido	San Diego	920287	12/20/12	
205	150	7908 El Cajon Blvd.	La Mesa	San Diego	91941	03/14/02	
206	91	3275 Lemon Grove	Lemon Grove	San Diego	91945	08/13/99	
207	101	1320 Highland Ave.	National City	San Diego	91950	10/14/99	
208	95	1036 Mission Ave.	Oceanside	San Diego	92054	09/09/99	
209	318	12369 Poway Road	Poway	San Diego	92064	10/29/09	
210	382	1326 Main St.	Ramona	San Diego	92065	11/07/13	
211	73	1862 Palm	San Diego	San Diego	92154	10/28/99	
212	287	2611 Market Street	San Diego	San Diego	92101	02/12/02	
213	212	265 Marketplace Ave.	San Diego	San Diego	92113	11/18/04	
214	142	4140 Clairemont Mesa	San Diego	San Diego	92117	12/20/01	
215	144	5931 University Ave.	San Diego	San Diego	92115	09/20/01	
216	307	155 S. Rancho Sante Fe Rd.	San Marcos	San Diego	92078	06/25/09	
217	99	121 Louisiana Ave.	San Ysidro	San Diego	92173	11/18/99	
218	244	705 E. Vista Way	Vista	San Diego	92084	06/01/06	
219	102	1266 E. Valley Parkway	Escondido	San Diego	92027	11/20/00	10/15/12
220	157	300 W. Kettleman Lane	Lodi	San Joaquin	95240	04/25/02	
221	177	1120 E. Hammer Lane	Stockton	San Joaquin	95210	12/19/02	
222	264	1449 W. March Lane	Stockton	San Joaquin	95207	02/08/07	
223	185	1320 W. 11th Street	Tracy	San Joaquin	95376	09/03/10	
224	353	7101 El Camino Real	Atascadero	San Luis Obispo	93422	11/10/13	
225	139	1309 N. H Street	Lompoc	Santa Barbara	93436	08/23/01	
226	339	424 State St.	Santa Barbara	Santa Barbara	93101	07/26/12	
227	351	1627 N. Broadway	Santa Maria	Santa Barbara	93458	09/27/12	
228	140	312 E. Betteravia	Santa Maria	Santa Barbara	93454	06/01/09	

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	Store	Address	City	County	Zip	Date Opened	Date Closed
229	224	260 East 10th Street	Gilroy	Santa Clara	95020	02/24/05	
230	270	1915 W. San Carlos	San Jose	Santa Clara	95110	11/12/09	
231	190	2611 Hilltop Drive	Redding	Shasta	96002	09/04/03	
232	218	601 Beck Avenue	Fairfield	Solano	94533	05/27/04	
233	192	551 Peabody Road	Vacaville	Solano	95687	02/05/04	
234	232	42 Springstowne Center	Vallejo	Solano	94591	02/09/06	
235	358	415 Rohnert Park	Rohnert Park	Sonoma	94928	01/24/13	
236	165	1450 E. Hatch Rd.	Modesto	Stanislaus	95351	08/29/02	
237	313	2205 McHenry	Modesto	Stanislaus	95350	06/09/08	
238	188	701 N. Golden State Blvd.	Turlock	Stanislaus	95380	12/11/03	
239	319	830 Colusa Ave	Yuba City	Sutter	95991	11/10/03	
240	162	825 W. Henderson Ave.	Porterville	Tulare	93257	03/28/02	
241	279	1035 E. Prosperity Avenue	Tulare	Tulare	93274	11/17/07	
242	155	2701 S. Mooney Blvd.	Visalia	Tulare	93277	02/14/02	
243	113	301 Arneil Rd.	Camarillo	Ventura	93010	07/27/00	
244	118	1855 E. Ventura Blvd.	Oxnard	Ventura	93030	09/28/00	
245	381	4917 S. Rose Ave.	Oxnard	Ventura	93033	11/14/13	
246	85	2551 N. Ventura Rd.	Port Hueneme	Ventura	93041	03/06/99	
247	214	1293B Los Angeles Ave.	Simi Valley	Ventura	93065	09/30/04	
248	115	2292-96 Tapo St.	Simi Valley	Ventura	93063	09/21/00	
249	359	950 E. Avenida de los Arboles	Thousand Oaks	Ventura	91360	02/21/13	
250	213	1425 South Victoria	Ventura	Ventura	93003	08/19/04	
251	124	2709 E. Main Street	Ventura	Ventura	93003	05/24/01	