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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SAN JOAQUIN

15 **THE PEOPLE OF THE STATE OF
16 CALIFORNIA,**

17 Plaintiff,

18 v.

19 **RALEY'S, a California Corporation; and
20 DOES 1 through 25, inclusive,**

21 Defendants.

22 Case No.

39-2014-00314607-CU-TT-STK

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

26 (Health & Saf. Code, Div. 20, Chapters 6.5,
27 and 6.95; Health & Saf. Code §§ 117600, *et*
28 *seq.*; Civ. Code §§ 56 *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; Todd D. Riebe, District Attorney of Amador County; Michael L.
34 Ramsey, District Attorney of Butte County; Mark A. Peterson, District Attorney of Contra Costa
35 County; Vern Pierson, District Attorney of El Dorado County; Michael R. Keitz, District
36 Attorney of Madera County; C. David Eyster, District Attorney of Mendocino County; Larry D.

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ROSA JUNGQUIRO, CLERK
BY _____

THIS CASE HAS BEEN ASSIGNED TO
JUDGE BOB McNATT IN DEPARTMENT 42
FOR ALL PURPOSES, INCLUDING TRIAL.

1 Morse II, District Attorney of Merced County; Dean D. Flippo, District Attorney of Monterey
2 County; Gary Lieberstein, District Attorney of Napa County; Clifford Newell, District Attorney
3 of Nevada County; R. Scott Owens, District Attorney of Placer County; Jan Scully, District
4 Attorney of Sacramento County; Candice Hooper-Mancino, District Attorney of San Benito
5 County; James P. Willett, District Attorney of San Joaquin County; Stephen M. Wagstaffe,
6 District Attorney of San Mateo County; Jeffrey F. Rosen, District Attorney of Santa Clara
7 County; Bob Lee, District Attorney of Santa Cruz County; Stephen Carlton, District Attorney of
8 Shasta County; J. Kirk Andrus, District Attorney of Siskiyou County; Donald A. du Bain,
9 District Attorney of Solano County; Jill R. Ravitch, District Attorney of Sonoma County; Birgit
10 A. Fladager, District Attorney of Stanislaus County; Jana McClung, District Attorney of Sutter
11 County; Gregg Cohen, District Attorney of Tehama County; Jeff W. Reisig, District Attorney of
12 Yolo County (collectively “Prosecutors”).

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

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

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

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

1 including, but not limited to, damage to containers, spills and releases of hazardous materials,
2 sharps waste, pharmaceutical waste, and various hazardous wastes generated from customer
3 returns of hazardous products.

4 11. At all times relevant hereto, Raley's was and is legally responsible for compliance
5 with the provisions of the Health and Safety Code, including Chapters 6.5 and 6.95 of Division 20
6 and sections 117600, *et seq.*, Civil Code section 56 *et seq.*, and Business and Professions Code
7 section 17200 *et seq.* at the California Facilities. The People are informed and believe, and based
8 thereon allege that, at all relevant times, Raley's controlled, managed, directed and was
9 responsible for the operations of the California Facilities, and/or aided and abetted, managed,
10 directed or acted in concert with persons who exercised control over those operations. The
11 People are informed and believe, and based thereon allege, that at all relevant times, Raley's was
12 legally responsible for all acts and omissions of its officers, directors, agents, employees,
13 contractors, vendors, affiliates, and/or representatives relating to the management of hazardous
14 materials and hazardous waste, and medical waste, at the California Facilities, and/or that Raley's
15 failed to take appropriate steps to prevent and/or correct the violations alleged herein despite
16 having power, authority and notice sufficient to do so.

17 12. Raley's is a "person," as defined in Health and Safety Code sections 25118 and
18 117745 and Business & Professions Code section 17201, and a "business," as defined in Health
19 and Safety Code section 25501, subdivision (c).

20 13. Raley's is a "pharmaceutical company," as defined in Civil Code section 56.05,
21 subdivision (h).

22 14. When reference is made herein to any act or omission of Raley's, such allegation
23 shall include the act or omission of the owners, officers, directors, agents, employees, contractors,
24 vendors, affiliates, and/or representatives of Raley's, engaged in said act or omission.

25 15. The identities of DOES 1 – 25 are unknown to Plaintiff at this time. At such time
26 as the identities of DOE Defendants become known, Plaintiff will amend this Complaint
27 accordingly. DOES 1 – 25 are, and at all times relevant to the claims in this Complaint were,
28 legally responsible for compliance with the provisions of California Health and Safety Code

1 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
2 implementing regulations, sections 117600 *et seq.*, sections 56, *et seq.* of the Civil Code, and
3 Business and Professions Code section 17200 *et seq.*, in connection with the ownership and/or
4 operation of the California Facilities. Raley’s and DOES 1 – 25 are collectively referred to herein
5 as “Defendants.”

6 16. At all times relevant hereto, DOES 1 – 25 were in a position of responsibility
7 allowing them to influence corporate policies or activities with respect to Raley’s compliance
8 with California environmental laws and regulations and California confidential medical
9 information laws at the California Facilities, and had, by reason of their position in the
10 corporation, responsibility and authority either to prevent in the first instance, or promptly to
11 correct, the violations complained of herein, but failed to do so. In addition to any direct personal
12 liability of these individuals, DOES 1 – 25 also are personally liable under the “responsible
13 corporate officer doctrine” for violations of law committed by Raley’s as alleged herein.

14 **JURISDICTION AND VENUE**

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

20 18. Plaintiff and Raley’s have entered into a series of agreements to toll any applicable
21 statutes of limitation. As a result of those agreements, the period of time from July 1, 2012
22 through July 1, 2014, inclusive, a total of 730 days (the “Tolling Period”) will not be included in
23 computing the time limited by any statutes of limitation applicable to the claims covered by the
24 tolling agreement.

25 **STATUTORY AND REGULATORY BACKGROUND**

26 19. The State of California has enacted a comprehensive statutory and regulatory
27 framework for the generation, handling, treatment, storage, transportation, and disposal of
28 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and

1 Safety Code, sections 25100, *et seq.*, and its implementing regulations, which are found at Code
2 of Regulations, title 22 sections 66260.1, *et seq.*, mandates a “cradle to grave” system known as
3 the Hazardous Waste Control Law (“HWCL”). The HWCL system is maintained to record the
4 generation, registration, tracking, storage, treatment, and disposal of hazardous wastes and to
5 provide for the protection of the public and the environment from present or potential risks posed
6 by hazardous wastes.

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

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

16 22. Companies that accumulate or generate hazardous waste in the course of their
17 operations and send such waste offsite for management, treatment, storage or disposal are subject
18 to certain regulatory requirements. (See California Code Regulations, title 22 sections 66262.10,
19 *et seq.*)

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

1 health care providers, regulatory agencies and other interested persons.

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

8 25. California enacted the Confidentiality of Medical Information Act (“CMIA”) to
9 protect the rights of individuals and the privacy of their medical information. The CMIA regulates
10 to whom, when and why individual medical information may be disclosed. Entities covered by
11 the CMIA include pharmaceutical companies. The CMIA is found in Civil Code sections 56, *et*
12 *seq.*

13 **ENFORCEMENT AUTHORITY**

14 26. Section 25189 of the Health and Safety Code imposes civil liability for any
15 negligent or intentional violation of the HWCL, or for any violation of any permit, rule,
16 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section
17 25189.2 is an alternative strict liability provision, which creates liability for any violation of the
18 HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued or
19 promulgated pursuant to the HWCL.

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

23 28. Section 56.36, subdivision (c) of the Civil Code imposes civil liability for any
24 violation of the CMIA.

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

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1 after the date of filing of this Complaint, hazardous materials handled by Defendants at the
2 California Facilities were and are rendered unsalable and unusable for their intended purpose as
3 the result of spillage, breakage, expiration of sell-by dates, contamination, damage to containers
4 or labeling, and other causes, and must be handled and disposed of as hazardous waste in
5 compliance with the HWCL.

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

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

18 38. Plaintiff is informed and believes and thereupon alleges that Defendants, and each
19 of them, have violated provisions of the following statutes, including implementing regulations
20 associated with each of the statutes and any related permit, rule, standard, or requirement issued
21 or promulgated pursuant to these statutes, at the California Facilities within the time period
22 applicable to this action: Chapter 6.5 of the Health and Safety Code, sections 25100, *et seq.*;
23 Chapter 6.95 of the Health and Safety Code, sections 25500, *et seq.*; Health and Safety Code
24 sections 117600, *et seq.*; Business and Professions Code sections 17200, *et seq.*; and in addition, to
25 the period of time tolled pursuant to Tolling Agreements referenced in paragraph 16.

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

3 e. On or about April 2, 2013, Defendants, at a California Facility in Salinas,
4 California, Monterey County, disposed of medical waste and items containing
5 private protected HIPPA information into a trash bin for transportation by a
6 garbage hauler not registered to transport hazardous waste, and bound for a point
7 not authorized to receive hazardous waste.

8 f. On or about April 26, 2013, Defendants, at a California Facility in Lodi,
9 California, San Joaquin County, disposed of medical waste and items containing
10 private protected HIPPA information, floor cleaner, devices with circuit boards,
11 and other hazardous items into a trash bin for transportation by a garbage hauler
12 not registered to transport hazardous waste, and bound for a point not authorized to
13 receive hazardous waste.

14 g. In May of 2013, Raley's transported various hazardous wastes from multiple
15 California facilities, using Raley's own owned or controlled vehicles and
16 consolidated, these hazardous wastes, along with normal reverse logistics types of
17 items destined to be salvaged, returned to the manufacturer, and/or donated. These
18 consolidated items were sent on Raley's owned or controlled vehicles, to a reverse
19 logistics facility located in Manteca, California, San Joaquin County.

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

25 a. Disposed of, or caused the disposal of, hazardous waste at a point not authorized,
26 in violation of Health and Safety Code sections 25189 and 25189.2, including in
27 drains at California Facilities, onto the surface or subsurface of the ground at
28 unauthorized locations, and at landfills not authorized to accept

1 commercial/retail hazardous waste and other locations not authorized to receive
2 hazardous waste;

- 3 b. Transported hazardous waste to unauthorized locations, including, without
4 limitation, Raley's distribution centers and reverse logistics vendors, in violation
5 of California Code of Regulations, title 22, section 66263.23;
- 6 c. Transported hazardous waste at, to, from, and between California Facilities on
7 vehicles that did not hold a valid registration issued by the California Department
8 of Toxic Substances Control ("DTSC"), in violation of Health and Safety Code
9 section 25163;
- 10 d. Knowingly caused to be deposited, without the permission of the owner,
11 hazardous substances upon the land of another, in violation of Penal Code
12 section 374.8, subdivision (b);
- 13 e. Failed to determine if a generated waste including, but not limited to, items
14 returned by customers to California Facilities, and wastes generated at California
15 Facilities via spills, container breakage, and other means, were hazardous wastes,
16 as required by Title 22 of the California Code of Regulations section 66262.11,
17 and, where such waste was hazardous, failed to handle the hazardous waste in
18 accordance with the requirements of Chapter 6.5 of the Health and Safety Code
19 and its implementing regulations in Title 22 of the California Code of
20 Regulations, including, but not limited to, section 66265.172 (compatible
21 contents), and section 66265.177 (placing incompatible waste streams in the
22 same container);
- 23 f. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of
24 the California Code of Regulations section 66260.200;
- 25 g. Failed to determine if hazardous waste had to be treated before it could be land
26 disposed by testing the waste or using generator knowledge of the waste, in
27 violation of Title 22 of the California Code of Regulations section 66268.7,
28 subdivision (a);

- 1 h. Failed to keep records of any test results, waste analysis, or other determinations
2 made in accordance with section 66262.11 for at least three (3) years from the
3 date that the waste was last sent to on-site or off-site treatment, storage, or
4 disposal, in violation of Title 22 of the California Code of Regulations, section
5 66262.40(c);
- 6 i. Failed to properly manage, identify the accumulation start date, and properly
7 label containers of hazardous waste at California Facilities, in violation of
8 California Code of Regulations, Title 22, section 66262.34;
- 9 j. Failed to properly manage, mark, and store hazardous waste aerosol cans, in
10 violation of the California Health and Safety Code, section 25201.16;
- 11 k. Failed to use and/or maintain containers holding hazardous waste at the
12 California Facilities so as to prevent leaks, in violation of Title 22 of the
13 California Code of Regulations section 66265.173 and Code of Federal
14 Regulations section 265.171;
- 15 l. Failed to keep containers of hazardous waste closed and/or sealed, except when
16 removing or adding hazardous waste, in violation of Title 22 of the California
17 Code of Regulations section 66265.173;
- 18 m. Failed to comply with employee training obligations pertaining to handling of
19 hazardous waste at California Facilities, in violation of California Code of
20 Regulations, Title 22, section 66265.16.
- 21 n. Failed to obtain and keep current all required hazardous waste generator permits
22 required by county and local ordinances;
- 23 o. Treated, stored, disposed of, transported, and offered for transportation,
24 hazardous waste without having received and used a proper identification
25 number from the U.S. Environmental Protection Agency or DTSC for the
26 originating facility, in violation of Title 22 of the California Code of Regulations
27 section 66262.12, subdivision (a);

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- 1 p. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous
2 waste facilities permit, in violation of Health and Safety Code section 25201(a)
3 and Title 22 of the California Code of Regulations section 66270.1;
- 4 q. Stored hazardous waste onsite beyond the time permitted by law at a facility
5 which did not have a hazardous waste storage permit from DTSC, in violation of
6 Title 22 of the California Code of Regulations section 66262.34, and California
7 Health and Safety Code section 25123.3, subdivision (h);
- 8 r. Failed to retain copies of all required hazardous waste manifests for three (3)
9 years, in violation of Health and Safety Code sections 25160, subdivisions (a)
10 and (b), 25160.2, subdivision (b)(3), and Title 22 of the California Code of
11 Regulations section 66262.40, subdivision (a). As used in this paragraph,
12 “manifest” means a shipping document originated and signed by a generator of
13 hazardous waste that contains all of the information required by law and that
14 complies with all applicable federal and state regulations, and includes, but is not
15 limited to, receipts;
- 16 s. Failed to submit to DTSC a legible copy of each manifest used within thirty (30)
17 days of each shipment of hazardous waste off-site or into California, in violation
18 of Title 22 of the California Code of Regulations section 66262.23, subdivision
19 (a)(4);
- 20 t. Failed to contact the transporter and/or the owner or operator of the designated
21 facility which was to receive the hazardous waste to determine the status of the
22 hazardous waste after the generator did not receive a copy of the manifest with
23 the handwritten signature of the owner or operator of the designated facility
24 within thirty-five (35) days of the date the waste was accepted by the initial
25 transporter, in violation of Title 22 of the California Code of Regulations section
26 66262.42;
- 27 u. Failed to submit an Exception Report to DTSC after the generator did not receive
28 a copy of the manifest with the handwritten signature of the owner or operator of

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 in 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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- 1 bb. Failed to label containers of hazardous waste before transporting hazardous
2 waste from California Facilities, in violation of California Code of Regulations,
3 Title 22, section 66262.31;
- 4 cc. Failed to implement, maintain and comply with an employee training program
5 meeting the requirements of Health and Safety Code section 25505, subdivision
6 (a), and Title 19 of the California Code of Regulations section 2732, pertaining
7 to hazardous materials, and business and area plans;
- 8 dd. Failed to implement and maintain a business emergency plan for emergency
9 response to a release or threatened release of hazardous materials, in violation of
10 Health and Safety Code section 25507;
- 11 ee. Failed to implement, maintain or to submit to the administering agency (as
12 defined in Health and Safety Code sections 25501 and 25502), a complete
13 hazardous materials business plan for each California Facility, in violation of
14 Health and Safety Code sections 25505 and 25508, and section 2729 of Title 19
15 of the California Code of Regulations;
- 16 ff. Failed to comply with the California MWMA, Health and Safety Code sections
17 117600, *et seq.*, by failing to have a Medical Waste Management Plan, failing to
18 retain on file disposal receipts and tracking documents for waste shipped offsite
19 for three (3) years, and improperly storing, transporting, and disposing of
20 pharmaceutical wastes;
- 21 gg. Allowed hazardous waste to remain, after causing its deposit, at a point not
22 authorized, without immediately filing a report of the deposit with the DTSC and
23 complying with any order by the DTSC, in violation of Health & Safety Code
24 sections 25189 subdivision (d) and 25189.2 subdivision (c).
- 25 hh. Disposed of or caused the disposal of hazardous waste at an unauthorized point
26 in violation of Health & Safety Code section 25189.5, subdivision (a).

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1 41. Defendants' noncompliance with the above statutes and regulations threatened
2 public health and safety and/or the environment and threatened the preservation and protection of
3 confidential medical information.

4 **FIRST CAUSE OF ACTION**

5 (Intentional Disposal of Hazardous Waste at a Point Not Authorized)
6 *(Health & Safety Code § 25189, subdivision (c))*

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

8 43. Health and Safety Code section 25189, subdivision (c), prohibits the intentional
9 disposal, or causing of the disposal, of hazardous waste at a point not authorized under Chapter
10 6.5.

11 44. Defendants, and each of them, have intentionally disposed of and/or caused the
12 disposal of hazardous waste originating from the California Facilities at unauthorized points, in
13 violation of Health and Safety Code section 25189, subdivision (c), and unless enjoined by order
14 of the Court, Defendants, and each of them, may or will continue in the course of conduct as
15 alleged herein.

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

21 46. Based on the above, the People request injunctive relief against Defendants under
22 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
23 25189, subdivision (c), as described in the People's prayer for relief.

24 **SECOND CAUSE OF ACTION**

25 (Negligent Disposal of Hazardous Waste at a Point Not Authorized)
26 *(Health and Safety Code section 25189, subdivision (d))*

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

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

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1 **FIFTH CAUSE OF ACTION**

2 (Negligent Unauthorized Transportation of Hazardous Waste)

3 *(Health & Safety Code sections 25163 and 25189, subdivision (b); California Code Regulations,*
4 *title 22 section 66263.23)*

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

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

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

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

21 66. Based on the above, the People request injunctive relief against Defendants under
22 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
23 25189, subdivision (b), as described in the People's prayer for relief.

24 **SIXTH CAUSE OF ACTION**

25 (Strict Liability for Unauthorized Transportation of Hazardous Waste)

26 *(Health & Safety Code, §§ 25163 and 25189.2, subdivision (b); California Code Regulations,*
27 *Title 22 section 66263.23)*

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

68. Chapter 6.5 of the Health and Safety Code prohibits the unauthorized
transportation, or causing the transportation, of hazardous waste. Section 25163 prohibits the

1 transportation of hazardous waste without a valid registration from DTSC. California Code of
2 Regulations, Title 22 section 66263.23(b) prohibits the transportation of hazardous waste to a
3 location not permitted or otherwise authorized by the DTSC to receive the waste.

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

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

13 71. Based on the above, the People request injunctive relief against Defendants under
14 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
15 25189.2, subdivision (b), as described in the People's prayer for relief.

16 SEVENTH CAUSE OF ACTION

17 (Intentional Violations of Hazardous Waste Handling and Storage Requirements)
18 *(Health & Safety Code Chapter 6.5 and Implementing Regulations sections 25100, et seq., and*
25189, subdivision (b); California Code Regulations, Title 22 sections 66260.1, et seq.)

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

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

27 74. Each intentional violation of the hazardous waste handling and storage
28 requirements that the People discovered within five (5) years of commencing this action, in

1 addition to any applicable tolling periods and those set forth in paragraph 16 herein, subjects
2 Defendants to a separate and additional civil penalty under Health and Safety Code section 25189,
3 subdivision (b).

4 75. Based on the above, the People request injunctive relief against Defendants under
5 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
6 25189, subdivision (b), as described in the People's prayer for relief.

7 **EIGHTH CAUSE OF ACTION**

8 (Negligent Violations of Hazardous Waste Handling and Storage Requirements)
9 *(Health & Safety Code Chapter 6.5 and Implementing Regulations sections 25100, et seq., and
10 25189, subdivision (b); California Code Regulations, Title 22 sections 66260.1, et seq.)*

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

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

19 78. Each negligent violation of the hazardous waste handling and storage requirements
20 that the People discovered within five (5) years of commencing this action, in addition to any
21 applicable tolling periods and those set forth in paragraph 16 herein, subjects Defendants to a
22 separate and additional civil penalty under Health and Safety Code section 25189, subdivision (b).

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

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1 **NINTH CAUSE OF ACTION**

2 (Strict Liability for Violations of Hazardous Waste Handling and Storage Requirements)
3 *(Health & Safety Code Chapter 6.5 and Implementing Regulations sections 25100, et seq., and*
4 *25189.2, subdivision (b); California Code Regulations, Title 22, sections 66260.1, et seq.)*

4 80. Plaintiff realleges paragraphs 1 through 79, inclusive.

5 81. Defendants, and each of them, have violated and continue to violate the hazardous
6 waste handling and storage requirements of Chapter 6.5 of Division 20 of the Health and Safety
7 Code sections 25100, *et seq.*, and its implementing regulations at California Code of Regulations,
8 title 22 sections 66260.1, *et seq.*, applicable to the California Facilities by virtue of the acts
9 alleged above, and incorporated herein by reference, and unless enjoined by order of the Court,
10 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

11 82. Each violation of the hazardous waste handling and storage requirements that the
12 People discovered within five (5) years of commencing this action, in addition to any applicable
13 tolling periods and those set forth in paragraph 16 herein, subjects Defendants to a separate and
14 additional civil penalty under Health and Safety Code section 25189, subdivision (b).

15 83. Based on the above, the People request injunctive relief against Defendants under
16 Health and Safety Code section 25181, and civil penalties under Health and Safety Code section
17 25189.2, subdivision (b), as described in the People's prayer for relief.

18 **TENTH CAUSE OF ACTION**

19 (Violations of Hazardous Materials Release Response Plans and Inventory Laws)
20 *(Health & Safety Code Chapter 6.95 sections 25507, 25505, 25508 and 25515;*
21 *California Code Regulations, Title 19, section 2729)*

21 84. Plaintiff realleges paragraphs 1 through 83, inclusive.

22 85. Chapter 6.95 of Division 20 of the Health and Safety Code requires businesses,
23 among other things, to provide training to employees and retain records, maintain hazardous
24 materials response plans and inventories, and applicable permits.

25 86. Defendants, and each of them, failed to maintain the required hazardous materials
26 response plans and inventories, training records and applicable permits required for the California
27 Facilities, and, unless enjoined by order of the Court, Defendants, and each of them, may or will
28 continue in the course of conduct as alleged herein.

1 **FIFTEENTH CAUSE OF ACTION**
2 **(Negligent Disclosure of Medical Information)**
3 *(Civil Code, § 56.101, subd. (a))*

4 108. Plaintiff realleges paragraphs 1 through 107, inclusive.

5 109. Section 56.101, subdivision (a) of the Civil Code prohibits the disposal of medical
6 information in a manner that does not preserve the confidentiality of the information contained
7 therein.

8 110. Defendants, and each of them, have engaged in the disposal of medical
9 information in a manner not preserving the confidentiality of the information contained therein, in
10 violation of Civil Code section 56.101, subdivision (a).

11 111. Each act of improper disposal of medical information that the People discovered
12 within three (3) years of commencing this action, in addition to any applicable tolling periods and
13 those set forth in paragraph 16 herein, subjects Defendants to a separate and additional civil
14 penalty under Civil Code section 56.36, subdivision (c)(1).

15 112. Based on the above, the People request civil penalties under Civil Code section
16 56.36, subdivision (c)(1), as described in the People's prayer for relief.

17 **SIXTEENTH CAUSE OF ACTION**
18 **(Violations of Unfair Competition Laws)**
19 *(Business and Professions Code sections 17200, et seq.)*

20 113. Plaintiff realleges paragraphs 1 through 112, inclusive.

21 114. Within four (4) years of commencing this action, in addition to any applicable
22 tolling periods and those set forth in paragraph 16 herein, Defendants, and each of them, have
23 engaged in, and continue to engage in, unlawful acts, omissions, and practices that constitute
24 unfair competition within the meaning of Business and Professions Code sections 17200 through
25 17208, including but not limited to, the acts or omissions and practices alleged in the First
26 through Fifteenth Causes of Action, above, and unless enjoined by order of the Court,
27 Defendants, and each of them, may or will continue in the course of conduct as alleged herein.

28 115. In addition to the acts alleged in the First through Fifteenth Causes of Action
above, Defendants, and each of them have engaged in, and continue to engage in the following
unlawful acts, omissions and practices that constitute unfair competition within the meaning of

1 Business and Professions Code sections 17200 *et seq.*: knowingly caused hazardous substances to
2 be deposited into or upon any road, street, highway, alley, or railroad right-of-way, or upon the
3 land of another, without the permission of the owner, or into the waters of this state in violation of
4 Penal Code section 374.8.

5 116. Each and every separate act constitutes an unlawful and/or unfair business
6 practice. Each day that Defendants, and each of them, engaged in each separate unlawful act,
7 omission or practice is a separate and distinct violation of Business and Professions Code section
8 17200.

9 117. Pursuant to Business and Professions Code section 17206, Defendants, and each of
10 them, are liable for civil penalties for each and every separate act of unfair competition as alleged
11 herein.

12 118. Defendants, and each of them, must be immediately and permanently enjoined,
13 pursuant to Business and Professions Code section 17203, from engaging in acts or practices that,
14 as alleged in this Complaint, violate Chapter 6.5 and/or 6.95 of Division 20 of the Health and
15 Safety Code and their implementing regulations, Health and Safety Code section 117600, *et seq.*,
16 Civil Code sections 56, *et seq.*, and county and local ordinances pertaining to hazardous waste
17 generator permits, which thereby constitute unfair competition within the meaning of Business
18 and Professions Code section 17200.

19 **PRAYER FOR RELIEF**

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

21 1. A Permanent Injunction requiring Defendants to comply with those provisions of
22 Health and Safety Code, Division 20, Chapter 6.5 and Implementing Regulations, which
23 Defendants are alleged to have violated;

24 2. A Permanent Injunction requiring Defendants to comply with those provisions of
25 Health and Safety Code, Division 20, Chapter 6.95 and Implementing Regulations, which
26 Defendants are alleged to have violated;

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

1 4. A Permanent Injunction, issued pursuant to Business and Professions Code section
2 17203, prohibiting Defendants from engaging in activity that violates the provisions of Chapters
3 6.5 and 6.95 of Division 20 of the Health and Safety Code, Health and Safety Code sections
4 117600, *et seq.*, and Civil Code section 56.101, as alleged in this Complaint which thereby
5 constitute unfair competition within the meaning of Business and Professions Code section
6 17200;

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

11 6. That the Defendants, herein be assessed a civil penalty of TWO THOUSAND
12 DOLLARS (\$2,000.00), for each violation, in an amount according to proof, but not less than
13 FIVE MILLION DOLLARS (\$5,000,000.00) for their violations of Health and Safety Code
14 sections 25515 and 25515.5;

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

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

23 9. That the Defendants, herein be assessed a civil penalty of TWO THOUSAND
24 FIVE HUNDRED DOLLARS (\$2,500.00), for each violation, in an amount according to proof,
25 but not less than TWENTY MILLION DOLLARS (\$20,000,000.00) for their violations of
26 Business and Professions Code section 17206;

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

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

Dated: July 10, 2014

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

By: _____
DAVID J. IREY
Special Deputy District Attorney

ATTACHMENT A

Additional Counsel for the Plaintiff

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EXHIBIT A

Exhibit A - California and Nevada Raley's Facilities

Address	City	County	Zip	Property Type
2531 Blanding Ave.	Alameda	Alameda	94501	Market
39200 Paseo Padre Parkway	Fremont	Alameda	94538	Market
26905 Mission Blvd.	Hayward	Alameda	94544	Market
919 E Stanley Blvd.	Livermore	Alameda	94550	Market
6397 Jarvis Ave.	Newark	Alameda	94560	Market
5420 Sunol Blvd.	Pleasanton	Alameda	94566	Market
3112 Santa Rita Road	Pleasanton	Alameda	94566	n/a
781 South Highway 49	Jackson	Amador	95642	Market
211 West East Ave.	Chico	Butte	95926	Market
2485 Notre Dame Blvd.	Chico	Butte	95928	Market
2325 Meyers St.	Oroville	Butte	95965	Market
3632 Lone Tree Way	Antioch	Contra Costa	94509	Market
2400 Sandcreek Rd.	Brentwood	Contra Costa	94513	Market
520 Center Ave.	Martinez	Contra Costa	94553	Market
2077 Main St.	Oakley	Contra Costa	94561	Market
1375 Buchanan Rd.	Pittsburg	Contra Costa	94565 (NOW #708 below)	n/a
1375 Buchanan Rd.	Pittsburg	Contra Costa	94565 (FKA #335 above)	Market
3360 San Pablo Dam Rd.	San Pablo	Contra Costa	94806	Market
130 Market Place	San Ramon	Contra Costa	94583	Market
2270 Oak Grove Road	Walnut Creek	Contra Costa	94598	Market
3510 Palmer Drive	Cameron Park	El Dorado	95682	Market
3935 Park Dr.	El Dorado Hills	El Dorado	95762	Market
166 Placerville Dr.	Placerville	El Dorado	95667	Market
4010 Lake Tahoe Blvd.	South Lake Tahoe	El Dorado	96150	Market
1040 Emerald Bay Rd.	South Lake Tahoe	El Dorado	96150	Market
40041 Hwy. 49	Oakhurst	Madera	93644	Market
1315 N. State St.	Ukiah	Mendocino	95482	Market
3550 N. G St.	Merced	Merced	95348	Market
900 Lighthouse Ave.	Monterey	Monterey	93940	Market
1320 S Main Street	Salinas	Monterey	93901	Market
217 Soscol Avenue	Napa	Napa	94559	Market
611 Trancas Street	Napa	Napa	94558	Market
692 Freeman Lane	Grass Valley	Nevada	95949	Market
13384 Lincoln Way	Auburn	Placer	95603	Market
2222 Grass Valley Hwy	Auburn	Placer	95603	Market
6845 Douglas Blvd.	Granite Bay	Placer	95746	Market
765 South Hwy 65	Lincoln	Placer	95648	Market
6119 Horseshoe Bar Rd.	Loomis	Placer	95650	Market
2341 Sunset Blvd.	Rocklin	Placer	95765	Market
1915 Douglas Blvd.	Roseville	Placer	95661	Market
4051 Woodcreek Oaks Blvd.	Roseville	Placer	95747	Market
1039 Sunrise Ave	Roseville	Placer	95661	Market
4008 Foothills Blvd.	Roseville	Placer	95747	Market
7901 Walerga Road	Antelope	Sacramento	95843	Market
4005 Manzanita Ave.	Carmichael	Sacramento	95608	Market
5159 Fair Oaks Blvd.	Carmichael	Sacramento	95608	Market
7847 Lichen Drive	Citrus Heights	Sacramento	95621	Market
4900 Elk Grove Blvd	Elk Grove	Sacramento	95757	Market
8787 Elk Grove Blvd	Elk Grove	Sacramento	95624	n/a
5100 Laguna Blvd.	Elk Grove	Sacramento	95758	Market

Exhibit A - California and Nevada Raley's Facilities

Address	City	County	Zip	Property Type
8425 Elk Grove-Florin Road	Elk Grove	Sacramento	95624	Market
9435 Elk Grove Blvd.	Elk Grove	Sacramento	95624	Market
9149 E. Stockton Blvd.	Elk Grove	Sacramento	95624 (NOW #706 below)	n/a
9149 E. Stockton Blvd	Elk Grove	Sacramento	95624 (FKA #444 above)	n/a
4840 San Juan Ave.	Fair Oaks	Sacramento	95628	Market
8870 Madison Ave.	Fair Oaks	Sacramento	95628	Market
715 East Bidwell St.	Folsom	Sacramento	95630	Market
25025 Blue Ravine Rd	Folsom	Sacramento	95630	Market
2760 E Bidwell	Folsom	Sacramento	95630	Market
10430 Twin Cities Rd.	Galt	Sacramento	95632	Market
2155 Gold Centre Lane	Gold River	Sacramento	95670	Market
7477 Watt Ave.	North Highlands	Sacramento	95660 (NOW #707 below)	n/a
7477 Watt Ave.	North Highlands	Sacramento	95660 (FKA #402 above)	Market
4360-4390 Roseville Road	North Highlands	Sacramento	95610	Facility
10385 Folsom Blvd.	Rancho Cordova	Sacramento	95670	n/a
430 Elkhorn Blvd	Rio Linda	Sacramento	95673	Market
3518 Marconi Avenue	Sacramento	Sacramento	95821	Market
6231 Fruitridge Road	Sacramento	Sacramento	95820	Market
4320 Arden Way	Sacramento	Sacramento	95864	Market
4850 Freeport Blvd.	Sacramento	Sacramento	95822	Market
8391 Folsom Blvd.	Sacramento	Sacramento	95826	Market
4551 Mack Rd.	Sacramento	Sacramento	95823	Market
4650 Natomas Blvd.	Sacramento	Sacramento	95835	Market
1301 Florin Road	Sacramento	Sacramento	95831	Market
1540 West El Camino	Sacramento	Sacramento	95833	Market
7465 Rush River Drive	Sacramento	Sacramento	95831	Market
3250 Arena Blvd.	Sacramento	Sacramento	95834	Market
6366 Mack Road	Sacramento	Sacramento	95823	Market
4401 Broadway	Sacramento	Sacramento	95817	Market
3547 Bradshaw Road	Sacramento	Sacramento	95827	Market
4061 Gateway Park Blvd.	Sacramento	Sacramento	95834	Warehouse
1700 Airline Hwy	Hollister	San Benito	95023	Market
311 Lower Sacramento Rd.	Lodi	San Joaquin	95242	Market
1280 Lathrop Rd.	Manteca	San Joaquin	95336	Market
2323 West Hammer Lane	Stockton	San Joaquin	95209	Market
1919 Boeing Way	Stockton	San Joaquin	95206	Warehouse
4255 Morada Lane	Stockton	San Joaquin	95212	Market
2550 S Tracy Blvd.	Tracy	San Joaquin	95376	Market
270 Redwood Shores Pkwy	Redwood City	San Mateo	94065	Market
1602 W Campbell Ave.	Campbell	Santa Clara	95008	Market
777 First Street	Gilroy	Santa Clara	95020	Market
15710 San Jose-Los Gatos Blvd.	Los Gatos	Santa Clara	95030	Market
401 Jacklin Road	Milpitas	Santa Clara	95035	Market
451 Vineyard Town Center	Morgan Hill	Santa Clara	95037	Market
1250 Grant Road	Mountain View	Santa Clara	94040	Market
7073 Santa Teresa Blvd.	San Jose	Santa Clara	95139	Market
6061 Snell Ave.	San Jose	Santa Clara	95123	Market

Exhibit A - California and Nevada Raley's Facilities

Address	City	County	Zip	Property Type
6061 Snell Ave.	San Jose	Santa Clara	95123	Market
809 Bay Ave.	Capitola	Santa Cruz	95010	Market
222 Mt Herman Road	Scotts Valley	Santa Cruz	95066	Market
1912 Main Street	Watsonville	Santa Cruz	95076	Market
110 Hartnell Ave.	Redding	Shasta	96002	n/a
201 Lake Blvd.	Redding	Shasta	96003	Market
1842 Fort Jones St.	Yreka	Siskiyou	96097	Market
890 Southampton Rd.	Benicia	Solano	94510	Market
3330 North Texas Street	Fairfield	Solano	94533	Market
3001 Travis Blvd.	Fairfield	Solano	94534	Market
270 Sunset Ave.	Suisun City	Solano	94585	Market
3061 Alamo Dr.	Vacaville	Solano	95687	Market
4300 Sonoma Blvd.	Vallejo	Solano	94589	Market
157 N McDowell Blvd.	Petaluma	Sonoma	94954	Market
100 Raley's Town Center	Rohnert Park	Sonoma	94928	Market
1407 Fulton Rd.	Santa Rosa	Sonoma	95403	Market
8852 Lakewood Dr.	Windsor	Sonoma	95492	Market
3430 Tully Rd.	Modesto	Stanislaus	95350	Market
1611 E. Hatch Rd.	Modesto	Stanislaus	95351	n/a
2401 E. Orangeburg Ave.	Modesto	Stanislaus	95355	n/a
3020 Floyd Avenue, Ste. 139	Modesto	Stanislaus	95355	Market
1945 N Street	Newman	Stanislaus	95360	Market
1550 F Street	Oakdale	Stanislaus	95361	Market
2900 Geer Rd.	Turlock	Stanislaus	95380	Market
700 Onstott Rd.	Yuba City	Sutter	95991	Market
1286 Stabler Lane	Yuba City	Sutter	95993	Market
725 S. Main St.	Red Bluff	Tehama	96080	Market
1601 West Capitol Ave.	West Sacramento	Yolo	95691	Market
2421 Del Monte Street, Ste. A	West Sacramento	Yolo	95691	n/a
3925 Seaport Blvd., Ste. 10 & 30	West Sacramento	Yolo	95605	Facility
2928 Ramco Street, Ste. 100	West Sacramento	Yolo	95691-5841	Facility
367 West Main St.	Woodland	Yolo	95695	Market
1885 E Gibson Road	Woodland	Yolo	95776	Market
3701 S. Carson Street	Carson City	Carson City	89701	
2105 West Williams	Fallon	Churchill	89406	
1363 Highway 395 North	Gardnerville	Douglas	89410	
2505 Mountain City Highway	Elko	Elko	89801	
1125 W. Winnemucca Boulevard	Winnemucca	Humboldt	89445	
930 Tahoe Boulevard	Incline Village	Washoe	89451	
1630 Robb Drive	Reno	Washoe	89523	
18144 Wedge Parkway	Reno	Washoe	89511	
1441 Mayberry Drive	Reno	Washoe	89509	
1075 N. Hills Boulevard	Reno	Washoe	89506	
701 Keystone Avenue	Reno	Washoe	89503	
4047 So. Virginia Street	Reno	Washoe	89502	
1265 West 7th Street	Reno	Washoe	89628	
2389 Wingfield Hills Road	Spanish Springs	Washoe	89436	
2895 North McCarran Boulevard	Sparks	Washoe	89431	