

1 EDMUND B. BROWN JR.
Attorney General of the State of California
2 KEN ALEX
Supervising Attorney General
3 JANILL L. RICHARDS
Deputy Attorney General
4 1515 Clay Street, 20th Floor
P.O. Box 70550
5 Oakland, California 94612
Telephone: (510) 622-2100
6 Facsimile: (510) 622-2270

7 Attorneys for Plaintiff People of the State of
California
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9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF RIVERSIDE**

11
12 PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

14 PILOT TRAVEL CENTERS LLC,

Defendant.

Case No.

COMPLAINT

17 1. The allegations in this Complaint, filed by the PEOPLE OF THE STATE OF
18 CALIFORNIA (“People”) against defendant PILOT TRAVEL CENTERS LLC (“Pilot”) relate
19 to Pilot’s compliance with laws and regulations governing (a) the operation and maintenance of
20 underground storage tanks (“USTs”) and UST systems and (b) the handling of hazardous wastes
21 and hazardous substances generated by operation of USTs, UST systems, and motor vehicle
22 maintenance, at Pilot’s facilities in California on or before July 1, 2007.

23 **Parties**

24 2. Defendant Pilot is a limited liability company organized under the laws of
25 Delaware and registered and active in this State. At all times relevant to this action, Pilot was
26 the owner and operator the following facilities in California: (1) 22717 Avenue 18 ½, Madera,
27 California; (2) 29025 West Plaza Drive, Santa Nella, California; (3) 14808 Warren Street, Lost
28 Hills, California; (4) 951 Work Street, Salinas, California; (5) 30035 County Road 8, Dunnigan,

1 California; (6) 5725 Highway 58, Kramer Junction, California; (7) 31642 Castaic Road, Castaic,
2 California; (8) 2591 Commerce Parkway, Barstow, California; (9) 8701 Highway 395, Hesperia,
3 California; and (10) 6605 North Indian Canyon Drive, North Palm Springs, California. As used
4 in this Complaint, these facilities will be referred to as the “California Facilities.”

5 5. Plaintiff the People of the State of California brings this action by and through
6 Edmund G. Brown Jr., Attorney General; by and through Steve Cooley, District Attorney of Los
7 Angeles County; by and through Dean D. Flippo, District Attorney of Monterey County; by and
8 through Michael A. Ramos, District Attorney of San Bernardino County; and Rod Pacheco,
9 District Attorney of Riverside County. The Attorney General and the District Attorneys bring
10 this action in their independent capacities as the representative of the People and not on behalf
11 of any other local or State agency or entity.

12 **Jurisdiction and Venue**

13 6. Venue lies in this Court because a substantial portion of the relevant events
14 occurred in, and a substantial number of the the claims arose in, Riverside County. (Code of
15 Civ. Proc., §§ 393.)

16 7. Pursuant to Code of Civil Procedure Sections 32.5, 85, 86, and 88, this case is
17 classified as an unlimited civil case.

18 **FIRST CAUSE OF ACTION**

19 8. The People allege that Pilot’s operation and maintenance of its USTs and UST
20 systems, and its handling, disposal, treatment and/or storage of hazardous waste and hazardous
21 materials generated by operation of the USTs, UST systems, and motor vehicle maintenance at
22 the California Facilities on or before July 1, 2007, violated Chapters 6.5, 6.7 and 6.95 of
23 Division 20 of the Health and Safety Code and the regulations promulgated under these
24 Chapters; Business and Professions Code section 17200, *et seq.* The facts giving rise to these
25 violations are described in the Inspection Reports of the Certified Unified Program Agencies for
26 each County in which the California Facilities are located and in Pilot’s Designated Operator
27 Reports for the California Facilities. The People bring this action pursuant to, among other
28 authorities, Health and Safety Code sections 25145.4, 25182, 25299.01, 25299.02, 25514, and

1 25516 and Business and Professions Code sections 17203, 17204 and 17206.

2 **PRAYER**

3 The People request that the Court enjoin defendants' violation of law, award penalties,
4 costs and fees in accordance with law, and grant any other such relief that the Court deems just
5 and proper.

6 Dated: _____, 2007

EDMUND G. BROWN JR.
Attorney General of the State of California

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JANILL L. RICHARDS
Deputy Attorney General
Attorneys for Plaintiff,
People of the State of California

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12 Dated: _____, 2007

ROD PACHECO
District Attorney of the County of Riverside

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STEPHANIE B. WEISSMAN
Deputy District Attorney
Attorneys for Plaintiff,
People of the State of California

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18 Dated: _____, 2007

STEVE COOLEY
District Attorney of the County of Los Angeles

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DANIEL J. WRIGHT
Deputy District Attorney
Attorneys for Plaintiff,
People of the State of California

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1 Dated: _____, 2007

DEAN D. FLIPPO
District Attorney of the County of Monterey

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MATTHEW K. BOGOSHIAN
Deputy District Attorney
Attorneys for Plaintiff,
People of the State of California

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7 Dated: _____, 2007

MICHAEL A. RAMOS
District Attorney of the County of San Bernardino

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R. GLENN YABUNO
Deputy District Attorney
Attorneys for Plaintiff,
People of the State of California

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