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[Plaintiff's Counsel Continued on Attached]

FILED
CLERK OF SUPERIOR COURT
STOCKTON
2013 SEP 17 PM 1:03
GARLEEN W. ALEXANDER
DEPUTY

THIS CASE HAS BEEN ASSIGNED TO
JUDGE LINDA L. LOFTHUS IN
DEPARTMENT 33 FOR ALL PURPOSES,
INCLUDING TRIAL.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

RITE AID CORPORATION, a Delaware corporation,

Defendant.

39-2013-00301944-CU-TT-STK
Case No.
COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES AND OTHER EQUITABLE RELIEF

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

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1 Plaintiff, the PEOPLE OF THE STATE OF CALIFORNIA (“People”), based on
2 information and belief, alleges as follows:

3 **PLAINTIFF**

4 1. The People bring this action and by and through Nancy E. O’Malley, District
5 Attorney of Alameda County; Michael L. Ramsey, District Attorney of Butte County; Barbara M.
6 Yook, District Attorney of Calaveras County; John R. Poyner, District Attorney of Colusa
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12 District Attorney of Lake County; Robert M. Burns, District Attorney of Lassen County; Jackie
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16 David Eyster, District Attorney of Mendocino County; Larry D. Morse II, District Attorney of
17 Merced County; Jordan Funk, District Attorney of Modoc County; Tim Kendall, Mono County
18 District Attorney; Dean D. Flippo, District Attorney of Monterey County; Gary Lieberstein,
19 District Attorney of Napa County; Clifford Newell, District Attorney of Nevada County; Tony
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5 Tulare County; Michael L. Knowles, District Attorney of Tuolumne County; Gregory D. Totten,
6 District Attorney of Ventura County; Jeff W. Reisig, District Attorney of Yolo County; and
7 Patrick McGrath, District Attorney of Yuba County (collectively “Prosecutors”).

8 2. Pursuant to Health and Safety Code section 25182, the Prosecutors may bring a
9 civil action in the name of the People of the State of California to enjoin any violation of Chapter
10 6.5 of Division 20 of the Health and Safety Code (hereinafter “Chapter 6.5”) and to seek civil
11 penalties for violations of the provisions of Chapter 6.5.

12 3. Pursuant to Health and Safety Code sections 25516 and 25516.1, the Prosecutors
13 may bring a civil action in the name of the People of the State of California to enjoin any
14 violation of Health and Safety Code sections 25503.5 to 25505, inclusive, and sections 25508 to
15 25520, inclusive, of Chapter 6.95 of Division 20 of the Health and Safety Code (hereinafter
16 “Chapter 6.95”).

17 4. Pursuant to Business and Professions Code sections 17203, 17204, and 17206, the
18 Prosecutors may bring a civil action in the name of the People of the State of California to enjoin
19 any person who engages, has engaged, or proposes to engage in unfair competition, as defined in
20 California Business and Professions Code section 17200, and to seek civil penalties for each act
21 of unfair competition.

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

25 **DEFENDANT, RITE AID CORPORATION,**

26 **AND DEFENDANT’S FACILITIES**

27 6. Defendant RITE AID CORPORATION (hereinafter “Defendant”), is now and at
28 all times mentioned in this Complaint was, a Delaware corporation, with its principal corporate
offices located in Camp Hill, Pennsylvania.