

1/28/22
11B

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Filed
AUG 09 2021
BRANDON E. RILEY CLERK
By *[Signature]*
DEPUTY

6 Additional Counsel Listed as Signatories

7 *Attorneys for Plaintiff, The People of the State of*
8 *California*

668268 / #870 -

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN JOAQUIN

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 **Plaintiff,**

15 v.

16 **BEAUTY SYSTEMS GROUP LLC, a**
17 **Delaware Limited Liability Company;**
18 **SALLY BEAUTY SUPPLY LLC, a**
Delaware Limited Liability Company

19 **Defendants.**

12 CASE NO.: STK-CV-UBT-2021-0007228

**STIPULATION FOR ENTRY OF
FINAL JUDGMENT AND
PERMANENT INJUNCTION; FINAL
JUDGMENT AND PERMANENT
INJUNCTION**

21 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA ("People"), generally
22 appearing through its attorneys: Tori Verber Salazar, District Attorney of San Joaquin County;
23 Nancy E. O'Malley, District Attorney of Alameda County; Todd R. Riebe, District Attorney of
24 Amador County; Michael L. Ramsey, District Attorney of Butte County; Diana Becton, District
25 Attorney of Contra Costa County; Vern Pierson, District Attorney of El Dorado County; Lisa A.
26 Smittcamp, District Attorney of Fresno County; Maggie Fleming, District Attorney of
27 Humboldt County; Gilbert Otero, District Attorney of Imperial County; Cynthia Zimmer,
28 District Attorney of Kern County; Keith L. Fagundes, District Attorney of Kings County;

JUL 30 2021

1 Michael N. Feuer, City Attorney of Los Angeles; George Gascón, District Attorney of Los
2 Angeles County; Sally O. Moreno, District Attorney of Madera County; Lori E. Frugoli,
3 District Attorney of Marin County; C. David Eyster, District Attorney of Mendocino County;
4 Kimberly R. H. Lewis, District Attorney of Merced County; Jeannine M. Pacioni, District
5 Attorney of Monterey County; Allison Haley, District Attorney of Napa County; Clifford
6 Newell, District Attorney of Nevada County; Todd Spitzer, District Attorney of Orange County;
7 Morgan Gire, District Attorney of Placer County; Michael A. Hestrin, District Attorney of
8 Riverside County; Anne Marie Schubert, District Attorney of Sacramento County; Jason
9 Anderson, District Attorney of San Bernardino County; Mara W. Elliott, City Attorney of San
10 Diego; Summer Stephan, District Attorney of San Diego County; Chesa Boudin, District
11 Attorney of San Francisco County; Dan Dow, District Attorney of San Luis Obispo County;
12 Stephen M. Wagstaffe, District Attorney of San Mateo County; Joyce E. Dudley, District
13 Attorney of Santa Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara County;
14 Stephanie A. Bridgett, District Attorney of Shasta County; J. Kirk Andrus, Siskiyou County
15 District Attorney; Krishna A. Abrams, District Attorney of Solano County; Jill R. Ravitch,
16 District Attorney of Sonoma County; Birgit A. Fladager, District Attorney of Stanislaus County;
17 Amanda L. Hopper, District Attorney of Sutter County; Tim Ward, District Attorney of Tulare
18 County; Cassandra Jenecke, Tuolumne County District Attorney; Erik Nasarenko, District
19 Attorney of Ventura County; Jeff W. Reisig, District Attorney of Yolo County; and BEAUTY
20 SYSTEMS GROUP LLC, a Delaware Limited Liability Company and SALLY BEAUTY
21 SUPPLY LLC, a Delaware Limited Liability Company (hereafter "Defendants") generally
22 appearing through its attorneys: THE LAW OFFICES OF MICHAEL STEEL, by MICHAEL
23 STEEL, ESQ.; (the People and Defendants shall be referred to collectively as the "Parties"),

24 **HEREBY STIPULATE AND AGREE AS FOLLOWS:**

25 1. The Court may enter this Stipulation for Entry of Final Judgment and Permanent Injunction,
26 and Final Judgment and Permanent Injunction ("Final Judgment") before the taking of any proof and
27 without trial or adjudication of any fact or law;

28

1 Control Law), sections 25500 et. seq. (Hazardous Materials Release Response Plans and Inventory
2 Law), sections 117600 et seq. (Medical Waste Management Act), and the regulations promulgated
3 under these sections.

4 "Certified Unified Program Agency" or "CUPA" is defined in Health and Safety Code
5 sections 25123.7(b) and 25404(a) and means the agency which, pursuant to Chapter 6.11 of Division
6 20 of the Health and Safety Code, and Title 27 of the California Code of Regulations, is certified by
7 the California Environmental Protection Agency with the jurisdictional responsibility and authority
8 to implement and enforce certain state environmental program requirements specified in Health and
9 Safety Code section 25404(c)(1).

10 "Facilities" means the retail beauty supply stores and distribution centers listed in Exhibit A
11 that Defendants formerly or currently own or operate in California, and all other Defendant retail
12 locations and distribution centers within the State of California that Defendants, or any respective
13 successor corporation or assignee, own or operate subsequent to the effective date of this Final
14 Judgment.

15 "Participating Agency" means an agency that has been designated by the CUPA to
16 administer one or more state environmental programs on behalf of the CUPA.

17 4. INJUNCTIVE RELIEF

18 4.1 **Applicability**

19 The provisions of this injunction are applicable to Defendants and their respective successor
20 corporations or assignees, and to all persons, partnerships, corporations and other entities that have
21 Direct Operational Control over Defendants' hazardous waste program and that are subject to the
22 jurisdiction of the courts in the state of California, and that are acting under, on behalf of, or at the
23 direction of Defendants, or their respective successor corporations or assigns, with actual or
24 constructive notice of this Injunction. "Direct Operational Control" shall mean active participation
25 in the operation of the hazardous waste programs in Facilities located in the State of California.

26 4.2 **General Injunctive Provision**

27 Pursuant to the provisions of Health and Safety Code sections 25181, 25515.6, 25515.8, and
28 Business and Professions Code section 17203, Defendants are permanently enjoined from violating

1 4.3.g. Failing to timely notify the DTSC by filing an exception report concerning the
2 treatment, storage, or disposal facility's failure to return any executed manifest, as required by
3 Health & Safety Code section 25160(b)(3) and California Code of Regulations, Title 22, section
4 66262.42;

5 4.3.h. Failing to contact the transporter and/or the owner or operator of a designated
6 facility which was to receive any hazardous waste from Defendants to determine the status of the
7 hazardous waste, in the event Defendants did not receive a copy of the manifest with the
8 handwritten signature of the owner or operator of the designated facility within thirty-five (35)
9 days of the date the waste was accepted by the initial transporter, as required by Health and Safety
10 Code section 25160(b)(3) and Title 22 of the California Code of Regulations, section 66262.42;

11 4.3.i. Treating, storing, disposing of, transporting, or offering for transportation, any
12 hazardous waste without having received and used a proper identification number from the U.S.
13 Environmental Protection Agency or DTSC for the originating facility, as required by title 22 of
14 the California Code of Regulations section 66262.12, subdivision (a) [Identification Numbers for
15 the Generator].

16 4.3.j. Failing to properly manage, identify the date of accumulation, or label containers of
17 hazardous waste at the Facilities, as required under California Code of Regulations, Title 22,
18 section 66262.34;

19 4.3.k. Failing to lawfully and timely dispose of all accumulated hazardous waste at each
20 Facility, in violation of California Code of Regulations, title 22, section 66262.34;

21 4.3.l. Storing and accumulating hazardous waste at the Facilities beyond the time limits
22 permitted by law as prohibited by California Code of Regulations, Title 22, section 6262.34;

23 4.3.m. Failing to segregate incompatible hazardous wastes in violation of California Code
24 of Regulations, Title 22, section 66265.177;

25 4.3.n. Failing to maintain properly designated hazardous waste storage areas at each
26 Facility, which include the segregation of hazardous wastes;

27 4.3.o. Failing to conduct inspections of hazardous waste storage areas at each Facility, as
28 required by California Code of Regulations, title 22, sections 66262.34 and 66265.174;

1 4.3.x. Failing to comply with any applicable storage, transportation or disposal
2 requirements under the California Medical Waste Management Act, Health and Safety Code
3 section 117600 et seq., at the Facilities, including but not limited to any requirements for storage,
4 transportation or disposal of regulated pharmaceutical waste as defined in Health and Safety Code
5 section 117690, as required by Health and Safety Code sections 117915 and 117918; and

6 4.3.y. Failing to take all reasonable steps to dispose, or arrange for the disposal, of
7 Defendant's customer records from Facilities within its custody or control containing personal
8 information, in violation of Civil Code 1798.81.

9 **4.4 Compliance Assurance Program**

10 Pursuant to the provisions of Health and Safety Code sections 25181, 25515.6, 25515.8,
11 and Business and Professions Code section 17203, and so as to ensure compliance with Paragraphs
12 4.2 and 4.3 above, Defendants are mandated to implement the following Compliance Assurance
13 Programs:

14 4.4.a. Dumpster Audit Program: Defendants shall, for a period of five years commencing
15 on the effective date of this Final Judgment, conduct, on an annual basis, independent third-party
16 audits of dumpsters and compactors at the lesser of ten (10) percent or forty (40) of the California
17 stores then-currently owned or operated by Defendants and one (1) compactor at a then-currently
18 operated California Distribution Center. Defendant shall provide notice to the People's
19 representatives as set forth in Exhibit B at least twenty court days prior to any waste audit
20 contemplated per this paragraph to allow the People the option to send an observer. Defendant
21 shall not provide advance notice to any facility being audited. The People shall have the right to
22 modify the list of facilities to be audited upon their determination that the list is not representative.

23 4.4.a.1. In the event any independent third-party audit finds the waste examined in
24 the audit was placed by a Defendant in violation of California Health and Safety Code
25 Chapters 6.5 and/or 6.95 of Division 20 of the California Health and Safety Code, and the
26 regulations promulgated under these chapters, Defendants shall within ninety (90) days of
27 the finding, provide a written reminder to every manager, clerk and employee employed at
28

1 4.4.b.2. Defendants shall require employees to participate in a training program to
2 familiarize them with hazardous waste handling and emergency procedures, relevant to the
3 employee's responsibilities during normal operations and emergencies, within six (6)
4 months of hire. Employees shall not work in positions lacking direct supervision until they
5 have completed such training program. Defendants shall review records quarterly to ensure
6 that this requirement is met.

7 4.4.b.3. Defendants shall review the training records on an annual basis to assure
8 each employee has received the training required pursuant to California Code of
9 Regulations, title 22, section 66265.16 and that less than one year has elapsed since the
10 employee last received the required training

11 4.4.b.4. Defendants shall promptly make available upon request by any CUPA
12 Inspector, peace officer, agent of the Department of Justice, California Environmental
13 Protection Agency, the Department of Toxic Substance Control, or District Attorney, all
14 training records maintained for each Facility. In the event such records are not available
15 during a governmental inspection, Defendants shall provide such records to the requesting
16 body within five (5) business days.

17 4.4.b.5. To the extent any of Defendants' Facilities generates more than 1,000
18 kg/month of hazardous waste, or 1 kg/month of acute hazardous waste, or 100 kg/month of
19 acute spill residue or soil, Defendants shall additionally comply with the personnel training
20 requirements contained in California Code of Regulations, Title 22, section 66265.16, to the
21 extent applicable for that particular Facility's employees.

22 4.4.c. **California Compliance Employee** - Defendants shall collectively employ, for at
23 least five (5) years after the effective date of this Final Judgment, at least one full time employee
24 who is responsible for supporting environmental compliance at the Facilities (the "California
25 Compliance Employee"). The California Compliance Employee shall: be familiar with the
26 requirements of this Final Judgment; work to oversee Defendant's hazardous waste and hazardous
27 materials compliance program; and ensure compliance with the injunctive terms of this Final
28 Judgment.

1 civil penalties pursuant to Health and Safety Code sections 25189 and 25515, and Business and
2 Professions Code section 17206, and Government Code section 26506, to be distributed to the
3 prosecuting/regulatory agencies identified in and in accordance with the terms of **Exhibits C-1 and**
4 **C-2**, attached.

5 **5.2. Supplemental Environmental Projects**

6 Within thirty (30) days after notice of entry of this Final Judgment, Defendants shall
7 collectively pay TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) for supplemental
8 environmental projects identified in, and in accordance with, the terms of **Exhibit D**, attached.

9 **5.3 Reimbursement of Costs of Investigation and Enforcement**

10 Within thirty (30) days after notice of entry of this Final Judgment, Defendants shall
11 collectively pay TWO HUNDRED EIGHTY-NINE THOUSAND NINE HUNDRED EIGHTY-
12 TWO DOLLARS AND 53/100 CENTS (\$289,982.53) for reimbursement of attorneys' fees, costs of
13 investigation, and other costs of enforcement, to the entities identified in, and in accordance with the
14 terms of, **Exhibits E-1 and E-2**, attached.

15 **5.4 Payments and Expenditures**

16 The payment of all civil penalties, reimbursement of cost payments and other expenditures
17 set forth in paragraphs 5.1, 5.2, and 5.3, above, shall be made by checks payable as provided in
18 **Exhibits C-1, C-2, D, E-1 and E-2**, and delivered to the District Attorney's Office for the County of
19 San Joaquin, Attention: Celeste Kaisch, Deputy District Attorney, for distribution pursuant to the
20 terms of this Final Judgment.

21 **6. MATTERS COVERED BY THIS FINAL JUDGMENT**

22 **6.1** This Final Judgment is a final and binding resolution and settlement of all violations
23 and causes of action arising from the facts set forth in the Complaint as to Defendants, and their
24 successors in interest, and the officers and employees of each of them ("Covered Parties"), through
25 April 1, 2021 ("Covered Matters"). Any claim, violation, or cause of action that is not a Covered
26 Matter is a "Reserved Claim." Reserved Claims include, without limitation, any unknown violation,
27 any violation that occurs after the filing of this Final Judgment and Permanent Injunction, any claim,
28 violation, or cause of action against Defendants' independent contractors or subcontractor; and

1 **9. INTERPRETATION**

2 This Final Judgment was drafted equally by all Parties hereto. Accordingly, any and all rules
3 of construction including Civil Code section 1654 which provides that ambiguity is construed
4 against the drafting party shall not apply to the interpretation of this Final Judgment and Permanent
5 Injunction.

6 **10. INTEGRATION**

7 This Final Judgment constitutes the entire agreement between the Parties and may not be
8 amended or supplemented except as provided for herein. No oral advice, guidance, suggestions or
9 comments by employees or officials of any Party regarding matters covered in this Final Judgment
10 shall be construed to relieve any Party of its obligations under this Final Judgment. No oral
11 representations have been made or relied upon other than as expressly set forth herein.

12 **11. FUTURE REGULATORY CHANGES**

13 Nothing in this Final Judgment shall excuse Defendants from meeting any more-stringent
14 requirement that may be imposed by applicable existing law or by any change in the applicable law.
15 To the extent any future statutory or regulatory change makes Defendants' obligations less stringent
16 than those provided for in this Final Judgment, Defendants' compliance with the changed law shall
17 be deemed compliance with this Final Judgment; however, any change in law or regulation shall not
18 reduce or diminish Defendants' obligations to comply with Paragraph 4.4.

19 **12. TERMINATION OF COMPLIANCE PROGRAM**

20 Defendants' obligations to engage in a compliance program pursuant to Paragraph 4.4 of this
21 Final Judgment and Permanent Injunction shall terminate five (5) years after the Effective Date of
22 this Final Judgment provided that Defendants first demonstrate they paid all amounts owed in
23 Paragraphs 5.1, 5.2 and 5.3.

24 **13. CONTINUING JURISDICTION**

25 The Court shall retain continuing jurisdiction to enforce the injunctive terms of this Final
26 Judgment and Permanent Injunction and to address any other matters arising out of or regarding this
27 Final Judgment.

28

1 **19. EFFECTIVE DATE OF FINAL JUDGMENT**

2 This Final Judgment and Permanent Injunction shall become effective upon entry. Except as
3 to Paragraphs 5.1, 5.2 and 5.3, Notice of Entry of Judgment is waived.

4 **IT IS SO STIPULATED.**

5 **FOR THE PEOPLE:**

6 TORI VERBER SALAZAR, District Attorney
County of San Joaquin, State of California

7 DATED: July 26, 2021

8 By: Celeste Kaisch
9 CELESTE KAISCH
Deputy District Attorney

10
11 NANCY E. O'MALLEY, District Attorney
12 County of Alameda, State of California

13 DATED: 6/1/21

14 By: [Signature]
15 KENNETH A. MIFSUD
Deputy District Attorney

16
17 TODD R. RIEBE, District Attorney
18 County of Amador, State of California

19 DATED: _____

20 By: _____
21 ROBERT E. NICHOLS
Deputy District Attorney

22 MICHAEL L. RAMSEY, District Attorney
23 County of Butte, State of California

24 DATED: _____

25 By: _____
26 ROBERT E. NICHOLS
Deputy District Attorney

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DIANA BECTON, District Attorney
County of Contra Costa, State of California

DATED: 5/19/21

By: 
STACEY GRASSINI
Senior Deputy District Attorney

VERN PIERSON, District Attorney
County of El Dorado, State of California

DATED: _____

By: _____
JODIE JENSEN
Deputy District Attorney

LISA A. SMITTCAMP, District Attorney
County of Fresno, State of California

DATED: _____

By: _____
ADAM J. KOOK
Deputy District Attorney

MAGGIE FLEMING, District Attorney
County of Humboldt, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

GILBERT OTERO, District Attorney
County of Imperial, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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DIANA BECTON, District Attorney
County of Contra Costa, State of California

DATED: _____

By: _____
STACEY GRASSINI
Senior Deputy District Attorney

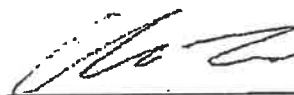
VERN PIERSON, District Attorney
County of El Dorado, State of California

DATED: _____

By: _____
JODIE JENSEN
Deputy District Attorney

LISA A. SMITTCAMP, District Attorney
County of Fresno, State of California

DATED: 5/20/2021

By: 
ADAM J. KOOK
Deputy District Attorney

MAGGIE FLEMING, District Attorney
County of Humboldt, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

GILBERT OTERO, District Attorney
County of Imperial, State of California

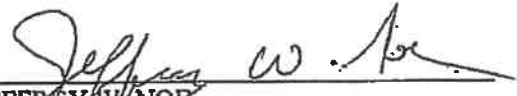
DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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CYNTHIA ZIMMER, District Attorney
County of Kern, State of California

DATED: 5-28-21

By: 
JEFFREY W. NOE
District Attorney

KEITH L. FAGUNDES, District Attorney
County of Kings, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

MICHAEL N. FEUER, City Attorney
City of Los Angeles, State of California

DATED: _____

By: _____
JESSICA B. BROWN
Supervising Deputy City Attorney

GEORGE GASCÓN, District Attorney
County of Los Angeles, State of California

DATED: _____

By: _____
DANIEL J. WRIGHT
Deputy District Attorney

SALLY O. MORENO, District Attorney
County of Madera, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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CYNTHIA ZIMMER, District Attorney
County of Kern, State of California

DATED: _____

By: _____
JEFFREY W. NOE
District Attorney


KEITH L. FAGUNDES, District Attorney
County of Kings, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

MICHAEL N. FEUER, City Attorney
City of Los Angeles, State of California

DATED: May 21, 2021

By:  _____
JESSICA B. BROWN
Supervising Deputy City Attorney

GEORGE GASCÓN, District Attorney
County of Los Angeles, State of California

DATED: _____

By: _____
DANIEL J. WRIGHT
Deputy District Attorney

SALLY O. MORENO, District Attorney
County of Madera, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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LORI E. FRUGOLI, District Attorney
County of Marin, State of California

DATED: 5/29/21

By: *Andres H. Perez*
ANDRES H. PEREZ
Deputy District Attorney

C. DAVID EYSTER, District Attorney
County of Mendocino, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

KIMBERLY LEWIS, District Attorney
County of Merced, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS

JEANNINE M. PACIONI, District Attorney
County of Monterey, State of California

DATED: _____

By: _____
DIJE NDREU
Deputy District Attorney

ALLISON HALEY, District Attorney
County of Napa, State of California

DATED: _____

By: _____
PATRICK COLLINS
Deputy District Attorney

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LORI E. FRUGOLI, District Attorney
County of Marin, State of California

DATED: _____

By: _____
ANDRES H. PEREZ
Deputy District Attorney

C. DAVID EYSTER, District Attorney
County of Mendocino, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney


KIMBERLY LEWIS, District Attorney
County of Merced, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS

JEANNINE M. PACIONI, District Attorney
County of Monterey, State of California

DATED: 5/18/21

By:  _____
DIJE NDREU
Deputy District Attorney

ALLISON HALEY, District Attorney
County of Napa, State of California

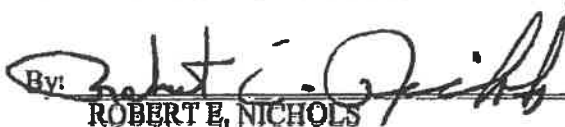
DATED: _____

By: _____
PATRICK COLLINS
Deputy District Attorney

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CLIFFORD NEWELL, District Attorney
County of Nevada, State of California

DATED: May 20, 2021

By: 
ROBERT E. NICHOLS
Deputy District Attorney

TODD SPITZER, District Attorney
County of Orange, State of California

DATED: _____

By: _____
WILLIAM G. FALLON
Deputy District Attorney

MORGAN GIRE, District Attorney
County of Placer, State of California

DATED: _____

By: _____
JANE CRUE
Deputy District Attorney

MICHAEL A. HESTRIN, District Attorney
County of Riverside, State of California

DATED: _____

By: _____
LAUREN R. MARTINEAU
Senior Deputy District Attorney

ANNE MARIE SCHUBERT, District Attorney
County of Sacramento, State of California

DATED: _____

By: _____
DOUGLAS WHALEY
Supervising Deputy District Attorney

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CLIFFORD NEWELL, District Attorney
County of Nevada, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney


TODD SPITZER, District Attorney
County of Orange, State of California

DATED: _____

By: _____
WILLIAM G. FALLON
Deputy District Attorney

MORGAN GIRE, District Attorney
County of Placer, State of California

DATED: 5-19-2021

By: 
JANE CRUE
Deputy District Attorney

MICHAEL A. HESTRIN, District Attorney
County of Riverside, State of California

DATED: _____

By: _____
LAUREN R. MARTINEAU
Senior Deputy District Attorney

ANNE MARIE SCHUBERT, District Attorney
County of Sacramento, State of California

DATED: _____

By: _____
DOUGLAS WHALEY
Supervising Deputy District Attorney

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CLIFFORD NEWELL, District Attorney
County of Nevada, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

TODD SPITZER, District Attorney
County of Orange, State of California

DATED: _____

By: _____
WILLIAM G. FALLON
Deputy District Attorney

MORGAN GIRE, District Attorney
County of Placer, State of California

DATED: _____

By: _____
JANE CRUE
Deputy District Attorney

MICHAEL A. HESTRIN, District Attorney
County of Riverside, State of California

DATED: _____

By: _____
LAUREN R. MARTINEAU
Senior Deputy District Attorney

ANNE MARIE SCHUBERT, District Attorney
County of Sacramento, State of California

DATED: 6/1/21

By: _____
DOUGLAS WHALEY
Supervising Deputy District Attorney

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JASON ANDERSON, District Attorney
County of San Bernardino, State of California

DATED: _____

By: _____
DAVID TULCAN
Deputy District Attorney

SUMMER STEPHAN, District Attorney
County of San Diego, State of California

DATED: 6-1-2021

By: Mike McCann
MICHAEL McCANN
Deputy District Attorney

MARA ELLIOTT, City Attorney
City of San Diego, State of California

DATED: _____

By: _____
JULIE RAU
Deputy City Attorney

CHESA BOUDIN, District Attorney
County of San Francisco, State of California

DATED: _____

By: _____
ALETHEA M. SARGENT
Assistant District Attorney

DAN DOW, District Attorney
County of San Luis Obispo, State of California

DATED: _____

By: _____
KENNETH J. JORGENSEN
Deputy District Attorney

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JASON ANDERSON, District Attorney
County of San Bernardino, State of California

DATED: _____

By: _____
DAVID TULCAN
Deputy District Attorney

SUMMER STEPHAN, District Attorney
County of San Diego, State of California

DATED: _____

By: _____
MICHAEL McCANN
Deputy District Attorney

MARA ELLIOTT, City Attorney
City of San Diego, State of California

DATED: _____

By: _____
JULIE RAU
Deputy City Attorney

CHESA BOUDIN, District Attorney
County of San Francisco, State of California

DATED: 6/1/2021

By: *Alethea Sargent*
ALETHEA M. SARGENT
Assistant District Attorney

DAN DOW, District Attorney
County of San Luis Obispo, State of California


DATED: _____

By: _____
KENNETH J. JORGENSEN
Deputy District Attorney

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STEPHEN M. WAGSTAFFE, District Attorney
County of San Mateo, State of California

DATED: 5-18-21

By: 

JOHN E. WILSON
Deputy District Attorney In Charge

JOYCE E. DUDLEY, District Attorney
County of Santa Barbara, State of California

DATED: _____

By: _____
CHRISTOPHER DALBEY
Deputy District Attorney

JEFFREY F. ROSEN, District Attorney
County of Santa Clara, State of California

DATED: _____

By: _____
BUD PORTER
Supervising Deputy District Attorney

STEPHANIE A. BRIDGETT, District Attorney
County of Shasta, State of California

DATED: _____

By: _____
ANAND B. JESRANI
Deputy District Attorney

J. KIRK ADRUS, District Attorney
County of Siskiyou, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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STEPHEN M. WAGSTAFFE, District Attorney
County of San Mateo, State of California

DATED: _____

By: _____
JOHN E. WILSON
Deputy District Attorney In Charge

JOYCE E. DUDLEY, District Attorney
County of Santa Barbara, State of California

DATED: _____

By: _____
CHRISTOPHER DALBEY
Deputy District Attorney

JEFFREY F. ROSEN, District Attorney
County of Santa Clara, State of California

DATED: May 20, 2021

By: [Signature]
BUD PORTER
Supervising Deputy District Attorney

STEPHANIE A. BRIDGETT, District Attorney
County of Shasta, State of California

DATED: _____

By: _____
ANAND B. JESRANI
Deputy District Attorney

J. KIRK ADRUS, District Attorney
County of Siskiyou, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

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STEPHEN M. WAGSTAFFE, District Attorney
County of San Mateo, State of California

DATED: _____

By: _____
JOHN E. WILSON
Deputy District Attorney In Charge

JOYCE E. DUDLEY, District Attorney
County of Santa Barbara, State of California

DATED: _____

By: _____
CHRISTOPHER DALBEY
Deputy District Attorney

JEFFREY F. ROSEN, District Attorney
County of Santa Clara, State of California

DATED: _____

By: _____
BUD PORTER
Supervising Deputy District Attorney


STEPHANIE A. BRIDGETT, District Attorney
County of Shasta, State of California

DATED: _____

By: _____
ANAND B. JESRANI
Deputy District Attorney

J. KIRK ADRUS, District Attorney
County of Siskiyou, State of California

DATED: May 20, 2021

By: 
ROBERT E. NICHOLS
Deputy District Attorney

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KRISHNA A. ABRAMS, District Attorney
County of Solano, State of California

DATED: _____

By: _____
DIANE M. NEWMAN
Deputy District Attorney

JILL R. RAVITCH, District Attorney
County of Sonoma, State of California

DATED: 7/26/21

By: 
MATTHEW T. CHEEVER
Deputy District Attorney

BIRGIT A. FLADAGER, District Attorney
County of Stanislaus, State of California

DATED: _____

By: _____
DARRELL G. GRIFFIN JR.
Deputy District Attorney

AMANDA L. HOPPER, District Attorney
County of Sutter, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

TIM WARD, District Attorney
County of Tulare, State of California

DATED: _____

By: _____
RODNEY M. BLACO
Deputy District Attorney

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**KRISHNA A. ABRAMS, District Attorney
County of Solano, State of California**

DATED: _____

By: _____
DIANE M. NEWMAN
Deputy District Attorney

**JILL R. RAVITCH, District Attorney
County of Sonoma, State of California**

DATED: _____

By: _____
MATTHEW T. CHEEVER
Deputy District Attorney

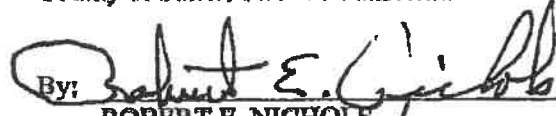
**BIRGIT A. FLADAGER, District Attorney
County of Stanislaus, State of California**

DATED: _____

By: _____
DARRELL G. GRIFFIN JR.
Deputy District Attorney

**AMANDA L. HOPPER, District Attorney
County of Sutter, State of California**

DATED: June 30, 2021

By:  _____
ROBERT E. NICHOLS
Deputy District Attorney

**TIM WARD, District Attorney
County of Tulare, State of California**

DATED: _____

By: _____
RODNEY M. BLACO
Deputy District Attorney

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CASSANDRA JENECKE, District Attorney
County of Tuolumne, State of California

DATED: May 20, 2021

By: 
ROBERT E. NICHOLS
Deputy District Attorney

ERIK NASARENKO, District Attorney
County of Ventura, State of California

DATED: _____

By: _____
MITCHELL F. DISNEY
Senior Deputy District Attorney

JEFF W. REISIG, District Attorney
County of Yolo, State of California

DATED: _____

By: _____
DAVID J. IREY
Assistant Chief Deputy District Attorney

FOR SALLY BEAUTY SUPPLY LLC AND BEAUTY SYSTEMS GROUP LLC

DATED: _____

By: _____
Sheri Caldwell
Associate General Counsel
Employment | Compliance | Litigation

DATED: _____

By: _____
Sheri Caldwell
Associate General Counsel
Employment | Compliance | Litigation

REVIEWED AND APPROVED AS TO FORM AND CONTENT:

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CASSANDRA JENECKE, District Attorney
County of Tuolumne, State of California

DATED: _____

By: _____
ROBERT E. NICHOLS
Deputy District Attorney

ERIK NASARENKO, District Attorney
County of Ventura, State of California

DATED: _____

By: _____
MITCHELL F. DISNEY
Senior Deputy District Attorney

JEFF W. REISIG, District Attorney
County of Yolo, State of California

DATED: 5/19/2021

By: _____

DAVID J. IREY
Assistant Chief Deputy District Attorney

FOR SALLY BEAUTY SUPPLY LLC AND BEAUTY SYSTEMS GROUP LLC

DATED: _____

By: _____
Sheri Caldwell
Associate General Counsel
Employment | Compliance | Litigation

DATED: _____

By: _____
Sheri Caldwell
Associate General Counsel
Employment | Compliance | Litigation

REVIEWED AND APPROVED AS TO FORM AND CONTENT:

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DATED: June 30, 2021 LAW OFFICES OF MICHAEL STEEL

By: Michael Steel
MICHAEL STEEL
Attorneys for Sally Beauty Supply LLC And
Beauty Systems Group LLC

IT IS SO ORDERED.

DATED: August 9, 2021 By: Robert T. Waters
JUDGE OF THE SUPERIOR COURT

ROBERT T. WATERS

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
1	2610 Fifth St, B-2A	Alameda	Alameda
2	2651 Blanding Ave, #G	Alameda	Alameda
3	965 San Pablo Ave	Albany	Alameda
4	7011 - 7017 Dublin Blvd	Dublin	Alameda
5	3839 Emery St, Ste 600	Emeryville	Alameda
6	35750 Fremont Blvd	Fremont	Alameda
7	37464 Fremont Blvd	Fremont	Alameda
8	39015 Fremont Hub	Fremont	Alameda
9	39106 Fremont Hub	Fremont	Alameda
10	43808 Christy St, #P3-B	Fremont	Alameda
11	1651 Industrial Pkwy W	Hayward	Alameda
12	26905 Mission Blvd, Ste M	Hayward	Alameda
13	1125 Catalina Dr	Livermore	Alameda
14	4310 Las Positas Rd	Livermore	Alameda
15	3040 E 9th St, Ste B	Oakland	Alameda
16	4515 Rosewood Dr, Ste 300	Pleasanton	Alameda
17	15100 Hesperian Blvd, #302	San Leandro	Alameda
18	15100 Hesperian Blvd, #304	San Leandro	Alameda
19	853 Fremont Ave	San Leandro	Alameda
20	32272 Dyer Street	Union City	Alameda
21	12120 Industry Blvd, #32	Jackson	Amador
22	1937 E 20th St, #2B-1	Chico	Butte
23	756 Mangrove Ave	Chico	Butte
24	1124-H Oro Dam Blvd	Oroville	Butte
25	1840 A St	Antioch	Contra Costa
26	3325 Deer Valley Rd	Antioch	Contra Costa
27	5759 Lone Tree Way, Ste A	Antioch	Contra Costa
28	2440 Sand Creek Rd, #E-2	Brentwood	Contra Costa
29	1803 Monument Blvd, Ste D	Concord	Contra Costa
30	4425 J Treat Blvd, #I&IA	Concord	Contra Costa
31	5416 Ygnacio Valley Rd	Concord	Contra Costa
32	1352 Fitzgerald Dr	Pinole	Contra Costa
33	624 San Pablo Ave, #E	Pinole	Contra Costa
34	4551 Century Blvd	Pittsburg	Contra Costa
35	25 Crescent Dr, Ste D	Pleasant Hill	Contra Costa
36	508C Contra Costa Blvd	Pleasant Hill	Contra Costa
37	4210 Mac Donald Ave, #A	Richmond	Contra Costa
38	3100 Crow Canyon Place, #C	San Ramon	Contra Costa
39	3141 C Crow Canyon Place	San Ramon	Contra Costa
40	1508 Sunnyvale Ave	Walnut Creek	Contra Costa
41	1512 Palos Verdes Mall, #A	Walnut Creek	Contra Costa
42	2400 Olympic Blvd, #6&7	Walnut Creek	Contra Costa
43	3951 Missouri Flat Rd	Placerville	El Dorado
44	1095 Herndon Ave, Ste 105	Clovis	Fresno
45	311 W Shaw Ave, Ste B2	Clovis	Fresno
46	50 W Bullard, Ste 102&103	Clovis	Fresno

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
93	1453 N Azusa, Ste F-1	Covina	Los Angeles
94	10778 Jefferson Blvd, 1/#C	Culver City	Los Angeles
95	10814 Jefferson Blvd, #E	Culver City	Los Angeles
96	8855 Apollo Way, Ste 200	Downey	Los Angeles
97	9928 Lakewood Blvd	Downey	Los Angeles
98	11108 Ramona Blvd	El Monte	Los Angeles
99	11635 E Valley Blvd, #A	El Monte	Los Angeles
100	1280 W Redondo Beach Blvd	Gardena	Los Angeles
101	142 S Brand Blvd, #B	Glendale	Los Angeles
102	320 S Central Ave	Glendale	Los Angeles
103	849 W Route 66	Glendora	Los Angeles
104	12130-1 Carson St	Hawaiian Gardens	Los Angeles
105	13601 Hawthorne Blvd, #2	Hawthorne	Los Angeles
106	14398 Oceangate Ave	Hawthorne	Los Angeles
107	5943 State St	Huntington Park	Los Angeles
108	5950 Pacific Blvd	Huntington Park	Los Angeles
109	3360 W Century Blvd	Inglewood	Los Angeles
110	1835 N Hacienda Blvd	La Puente	Los Angeles
111	5440 Woodruff Ave	Lakewood	Los Angeles
112	5907-B South St	Lakewood	Los Angeles
113	1028 E Ave J, Ste B1	Lancaster	Los Angeles
114	1941 W Ave L	Lancaster	Los Angeles
115	2755 W Ave L	Lancaster	Los Angeles
116	4075 W Ave L	Lancaster	Los Angeles
117	44418 1/2 Valley Central Way	Lancaster	Los Angeles
118	44580 Valley Central	Lancaster	Los Angeles
119	1947 Pacific Coast Hwy	Lomita	Los Angeles
120	225 East 5th St	Long Beach	Los Angeles
121	4554 Atlantic Ave	Long Beach	Los Angeles
122	4746 E Pacific Coast Hwy	Long Beach	Los Angeles
123	5561 Stearns St	Long Beach	Los Angeles
124	10749 Long Beach Blvd	Lynwood	Los Angeles
125	610 W Huntington Dr	Monrovia	Los Angeles
126	1100 S Atlantic Blvd	Monterey Park	Los Angeles
127	2166 Atlantic Blvd	Monterey Park	Los Angeles
128	11707 E Rosecrans Ave	Norwalk	Los Angeles
129	2321 East Ave S, Ste E-5	Palmdale	Los Angeles
130	38024 47th St E, Unit E	Palmdale	Los Angeles
131	39450 10th St W, Ste D	Palmdale	Los Angeles
132	14525-D Lakewood Blvd	Paramount	Los Angeles
133	2237 E Colorado Blvd, B105	Pasadena	Los Angeles
134	631 N Fair Oaks Ave	Pasadena	Los Angeles
135	8738 Washington Blvd	Pico Rivera	Los Angeles
136	101 E Foothill Blvd, #22	Pomona	Los Angeles
137	18 Rancho Camino Dr, #106	Pomona	Los Angeles
138	2418 Foothill Blvd, Ste E	Pomona	Los Angeles

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
185	12115 Ventura Blvd	Studio City	Los Angeles
186	8357 Laurel Canyon Blvd	Sun Valley	Los Angeles
187	13758 Foothill Blvd	Sylmar	Los Angeles
188	16500 Sherman Way	Van Nuys	Los Angeles
189	7882 Van Nuys Blvd, Ste 3	Van Nuys	Los Angeles
190	2494 Lincoln Blvd	Venice	Los Angeles
191	6512 Platt Ave	West Hills	Los Angeles
192	20929 Ventura Blvd, 30-31	Woodland Hills	Los Angeles
193	2185-G W Cleveland Ave	Madera	Madera
194	2390-5 W Cleveland Ave	Madera	Madera
195	75-F Bellam Blvd	San Rafael	Marin
196	770 W Francisco Blvd	San Rafael	Marin
197	219 E Gobi St	Ukiah	Mendocino
198	534 E Perkins St	Ukiah	Mendocino
199	546 E Perkins St	Ukiah	Mendocino
200	1114 Commerce Ave	Atwater	Merced
201	1451 W Pacheco Blvd, #B	Los Banos	Merced
202	1254 W Olive Ave	Merced	Merced
203	80 W Olive	Merced	Merced
204	1546 N Sanborn Rd	Salinas	Monterey
205	1652 N Main St	Salinas	Monterey
206	339 Maple St, Ste A	Salinas	Monterey
207	828 Playa Ave	Sand City	Monterey
208	1121 Military Ave, #202	Seaside	Monterey
209	902 Enterprise Way, Ste F	Napa	Napa
210	682 A Freeman Ln	Grass Valley	Nevada
211	2038 E Lincoln Ave	Anaheim	Orange
212	3150 W Lincoln Ave, #120	Anaheim	Orange
213	8086 E Santa Ana Cyn, #158	Anaheim Hills	Orange
214	8890 Valley View St, Ste C	Buena Park	Orange
215	1913 Harbor Blvd	Costa Mesa	Orange
216	2200 Harbor Blvd, Ste D-120	Costa Mesa	Orange
217	6899 Katella Ave	Cypress	Orange
218	34320 Pacific Coast Hwy, #E	Dana Point	Orange
219	17815 Newhope St	Fountain Valley	Orange
220	18309 Brookhurst Ave, #3	Fountain Valley	Orange
221	2435 E Chapman Ave	Fullerton	Orange
222	3308 Yorba Linda Blvd	Fullerton	Orange
223	936 W Orangethorpe Ave	Fullerton	Orange
224	12131-A Brookhurst St	Garden Grove	Orange
225	9925 Chapman Ave	Garden Grove	Orange
226	7391 Warner Ave, Unit I/J	Huntington Beach	Orange
227	16585 Von Karman, #20-2E	Irvine	Orange
228	1380 S Harbor Blvd	La Habra	Orange
229	1641 W Imperial Hwy, Ste A	La Habra	Orange
230	27261 La Paz Rd, Ste D	Laguna Niguel	Orange

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
277	10243 Magnolia Ave	Riverside	Riverside
278	3480 A La Sierra Ave	Riverside	Riverside
279	3961-A Chicago Ave	Riverside	Riverside
280	6171 Magnolia Ave	Riverside	Riverside
281	6181 Magnolia Ave	Riverside	Riverside
282	26435 Ynez Rd, Ste A	Temecula	Riverside
283	27576 Ynez Rd, Ste H9	Temecula	Riverside
284	32155 Temecula Pkwy, E-1	Temecula	Riverside
285	4740 Manzanita Ave	Carmichael	Sacramento
286	6976 Sunrise Blvd	Citrus Heights	Sacramento
287	7859 Greenback Ln	Citrus Heights	Sacramento
288	9165 Elk Grove Florin, 105	Elk Grove	Sacramento
289	9630 Bruceville Rd, #100	Elk Grove	Sacramento
290	1004 E Bidwell, B300	Folsom	Sacramento
291	1008 Riley St, Ste 1-B	Folsom	Sacramento
292	10430 Twin Cities Rd, #30	Galt	Sacramento
293	2260 Sunrise Blvd	Rancho Cordova	Sacramento
294	3084 Sunrise Blvd, Ste 1&2	Rancho Cordova	Sacramento
295	1221 Alhambra Blvd, #102	Sacramento	Sacramento
296	1250 Howe Ave, #12-A	Sacramento	Sacramento
297	3651 Truxel Rd, Ste 1	Sacramento	Sacramento
298	3810 Truxel Rd, Ste 200A	Sacramento	Sacramento
299	4306-1 Florin Rd	Sacramento	Sacramento
300	5051 Auburn Blvd, Ste D	Sacramento	Sacramento
301	5351 Elkhorn Blvd	Sacramento	Sacramento
302	5635 Freeport Blvd, #6	Sacramento	Sacramento
303	815 Howe Ave	Sacramento	Sacramento
304	8359 Elk Grove Florin, 107	Sacramento	Sacramento
305	20258 US Hwy 18, #470	Apple Valley	San Bernardino
306	3959 Grand Ave, Ste D	Chino	San Bernardino
307	5521-B Philadelphia St	Chino	San Bernardino
308	4200 Chino Pkwy, Ste 835	Chino Hills	San Bernardino
309	1100 S Mt Vernon Ave, Ste H	Colton	San Bernardino
310	16771 Valley Blvd	Fontana	San Bernardino
311	17151 Foothill Blvd, Ste E	Fontana	San Bernardino
312	9820 Sierra Ave, Ste E&F	Fontana	San Bernardino
313	12717 Main St, Ste 500	Hesperia	San Bernardino
314	16930 Main St, Ste D	Hesperia	San Bernardino
315	5404 Moreno St, #C	Montclair	San Bernardino
316	12859 Foothill Blvd, Ste C	Rancho Cucamonga	San Bernardino
317	8760 Baseline Rd	Rancho Cucamonga	San Bernardino
318	9879 Foothill Blvd, #BC&D	Rancho Cucamonga	San Bernardino
319	2054 Redlands Blvd, Ste #B	Redlands	San Bernardino
320	683 N 6th St	Redlands	San Bernardino
321	1310 S Riverside Ave, #3E	Rialto	San Bernardino
322	553 S Riverside Ave	Rialto	San Bernardino

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
369	1672 Main Street, Ste B	Ramona	San Diego
370	655 Rancho Santa Fe Rd	San Marcos	San Diego
371	4345 Camino Dela Plz, M320	San Ysidro	San Diego
372	601 E San Ysidro Blvd	San Ysidro	San Diego
373	9535 Mission Gorge Rd, #H	Santee	San Diego
374	9625 Mission Gorge Rd, #C1	Santee	San Diego
375	1841 University Dr, #130	Vista	San Diego
376	1920 Hacienda Dr	Vista	San Diego
377	1525 Sloat Blvd	San Francisco	San Francisco
378	1655 Bryant St, #180	San Francisco	San Francisco
379	2300 16th St, Ste 225	San Francisco	San Francisco
380	450 Sixth St	San Francisco	San Francisco
381	1110 W Kettleman Ln, #5	Lodi	San Joaquin
382	2314 W Kettleman Ln	Lodi	San Joaquin
383	1152 S Main St	Manteca	San Joaquin
384	1163 S Main St, Space A-4	Manteca	San Joaquin
385	10710 Trinity Pkwy, #C	Stockton	San Joaquin
386	1453 March Ln	Stockton	San Joaquin
387	4339 E Morada Ln, #A-130	Stockton	San Joaquin
388	4719 Quail Lakes Dr, Ste 8	Stockton	San Joaquin
389	5756 Pacific Ave, Ste H-1	Stockton	San Joaquin
390	6707 Sampson Rd, Ste A	Stockton	San Joaquin
391	678 N Wilson Way, #B-32	Stockton	San Joaquin
392	1240 W 11th St	Tracy	San Joaquin
393	804 W 11th Blvd	Tracy	San Joaquin
394	1134 W Branch St	Arroyo Grande	San Luis Obispo
395	2280 El Camino Real	Atascadero	San Luis Obispo
396	156 Niblick Rd	Paso Robles	San Luis Obispo
397	12314 Los Osos Valley Rd	San Luis Obispo	San Luis Obispo
398	285 Madonna Rd, Ste A	San Luis Obispo	San Luis Obispo
399	6875 Mission Blvd	Daly City	San Mateo
400	1111 El Camino Real	Millbrae	San Mateo
401	1261 Linda Mar, S/C	Pacifica	San Mateo
402	1351 Broadway St	Redwood City	San Mateo
403	2535 El Camino Real, B	Redwood City	San Mateo
404	137 Hickey Blvd	S San Francisco	San Mateo
405	1252 El Camino Real, Ste A	San Bruno	San Mateo
406	1581 Industrial Rd	San Carlos	San Mateo
407	1830 S Norfolk St	San Mateo	San Mateo
408	5801-E Calle Real	Goleta	Santa Barbara
409	649 W Central Ave	Lompoc	Santa Barbara
410	214 E Cota St	Santa Barbara	Santa Barbara
411	2230 S Depot St, Ste E	Santa Maria	Santa Barbara
412	2530F S Broadway	Santa Maria	Santa Barbara
413	884 W Hamilton Ave	Campbell	Santa Clara
414	280 E 10th St, Unit A	Gilroy	Santa Clara

Exhibit A - California Sally Beauty Supply Facilities

	Address	City	County
461	3848 McHenry Ave, #120	Modesto	Stanislaus
462	1530 East F St, #C	Oakdale	Stanislaus
463	1020 Sperry Ave, Ste B	Patterson	Stanislaus
464	2331 Claribel Rd, Ste B	Riverbank	Stanislaus
465	1824 Countryside Dr	Turlock	Stanislaus
466	2311 W Main St	Turlock	Stanislaus
467	2373 W Main St	Turlock	Stanislaus
468	1407 Colusa Ave, Ste A	Yuba City	Sutter
469	706B W Onstott Rd	Yuba City	Sutter
470	450 W Monte, Ste E	Dinuba	Tulare
471	1317 W Henderson Ave	Porterville	Tulare
472	831 W Henderson Ave	Porterville	Tulare
473	1541 Hillman St	Tulare	Tulare
474	1561 Hillman St	Tulare	Tulare
475	2226 S Mooney Blvd, Unit A3	Visalia	Tulare
476	3282 S Mooney Blvd	Visalia	Tulare
477	3318 N Dinuba Blvd, Ste C	Visalia	Tulare
478	1275 Sanguinetti Rd	Sonora	Tuolumne
479	2570 A Los Posas Rd	Camarillo	Ventura
480	225&227 W Los Angeles Ave	Moorpark	Ventura
481	2051 N Rose Ave, Ste B100	Oxnard	Ventura
482	2351 E Vineyard Ave	Oxnard	Ventura
483	543 W Channel Island Blvd	Port Hueneme	Ventura
484	596 W Main St	Santa Paula	Ventura
485	1542 E Los Angeles Ave	Simi Valley	Ventura
486	2837 Cochran St, Ste F	Simi Valley	Ventura
487	1610 E Thousand Oaks Blvd, #F	Thousand Oaks	Ventura
488	1750 N Moorpark Rd	Thousand Oaks	Ventura
489	4705-6 Telephone Rd	Ventura	Ventura
490	5682 Telephone Rd, Unit 2	Ventura	Ventura
491	775 Ikea Ct, Ste 110	West Sacramento	Yolo
492	1374 E Main St	Woodland	Yolo

Exhibit B – Notices

For the People:

Celeste Kaisch
Deputy District Attorney
San Joaquin County District Attorney's Office
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EXHIBIT C-1 - PROSECUTOR PENALTIES

AGENCY	Civil Penalties - Business and Professions \$17200 Penalties	Health and Safety \$25515.2 Penalties	Health and Safety \$25189 Penalties	Total of Civil Penalties Paid to Agency
Alameda Co. District Attorney's Office	\$ 93,139.00	\$ -	\$ -	\$ 93,139.00
Amador Co. District Attorney's Office	\$ 1,300.00			\$ 1,300.00
Butte Co. District Attorney's Office	\$ 3,900.00	\$ -	\$ -	\$ 3,900.00
Contra Costa Co. District Attorney's Office	\$ 93,139.00	\$ -	\$ -	\$ 93,139.00
El Dorado Co. District Attorney's Office	\$ 1,300.00	\$ -	\$ -	\$ 1,300.00
Fresno Co. District Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
Humboldt Co. District Attorney's Office	\$ 1,300.00	\$ -	\$ -	\$ 1,300.00
Imperial Co. District Attorney's Office	\$ 3,900.00	\$ -	\$ -	\$ 3,900.00
Kern Co. District Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
Kings Co. District Attorney's Office	\$ 5,200.00	\$ -	\$ -	\$ 5,200.00
Los Angeles City Attorney's Office	\$ 76,344.00	\$ -	\$ -	\$ 76,344.00
Los Angeles Co. District Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
Madera Co. District Attorney's Office	\$ 2,600.00			\$ 2,600.00
Marin Co. District Attorney's Office	\$ 2,600.00	\$ -	\$ -	\$ 2,600.00
Mendocino Co. District Attorney's Office	\$ 3,900.00	\$ -	\$ -	\$ 3,900.00
Merced Co. District Attorney's Office	\$ 5,200.00	\$ -	\$ -	\$ 5,200.00
Monterey Co. District Attorney's Office	\$ 6,500.00	\$ -	\$ -	\$ 6,500.00
Napa Co. District Attorney's Office	\$ 1,300.00	\$ -	\$ -	\$ 1,300.00
Nevada Co. District Attorney's Office	\$ 1,300.00	\$ -	\$ -	\$ 1,300.00
Orange Co. District Attorney's Office	\$ 93,139.00	\$ -	\$ -	\$ 93,139.00
Placer Co. District Attorney's Office*	\$ 9,100.00	\$ -	\$ -	\$ 9,100.00
Riverside Co. District Attorney's Office**	\$ 93,139.00	\$ -	\$ -	\$ 93,139.00
Sacramento Co. District Attorney's Office***	\$ 112,989.00	\$ -	\$ -	\$ 112,989.00
San Bernardino Co. District Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
San Diego City Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
San Diego Co. District Attorney's Office	\$ 112,989.00	\$ -	\$ -	\$ 112,989.00
San Francisco Co. District Attorney's Office	\$ 5,200.00	\$ -	\$ -	\$ 5,200.00
San Joaquin Co. District Attorney's Office****	\$ 62,989.00	\$ 50,000.00	\$ -	\$ 112,989.00
San Luis Obispo Co. District Attorney's Office	\$ 6,500.00	\$ -	\$ -	\$ 6,500.00
San Mateo Co. District Attorney's Office	\$ 76,344.00	\$ -	\$ -	\$ 76,344.00
Santa Barbara Co. District Attorney's Office	\$ 6,500.00	\$ -	\$ -	\$ 6,500.00
Santa Clara Co. District Attorney's Office	\$ 15,000.00	\$ -	\$ -	\$ 15,000.00
Shasta Co. District Attorney's Office	\$ 3,900.00	\$ -	\$ -	\$ 3,900.00
Siskiyou Co. District Attorney's Office	\$ 1,300.00	\$ -	\$ -	\$ 1,300.00

EXHIBIT D

EXHIBIT E-1

EXHIBIT C-2 - AGENCY PENALTIES

Agency	Civil Penalties - Health and Safety Code §25515.2	Civil Penalties - Health and Safety 25189 .	Total of Civil Penalties Paid to Agency
Alameda County Environmental Health Services	\$ 1,271.00	\$ 444.00	\$ 1,715.00
Fremont City Fire Dept., Haz Mat Unit	\$ 706.00	\$ 247.00	\$ 953.00
City of San Leandro Environmental Services	\$ 424.00	\$ 148.00	\$ 572.00
Livermore/Pleasanton Fire Dept., Haz Mat Unit 1	\$ 424.00	\$ 148.00	\$ 572.00
Contra Costa County Health Services Dept., Hazardous Materials Program	\$ 10,042.00	\$ 889.00	\$ 10,931.00
Department of Toxics Substances Control	\$ -	\$ 32,000.00	\$ 32,000.00
Fresno - Community Health Dept., Environmental Health Division	\$ 7,500.00	\$ -	\$ 7,500.00
Los Angeles City Fire Department - CUPA	\$ 7,500.00		\$ 7,500.00
Los Angeles County Fire Health and Hazardous Material Division		\$ 5,333.00	\$ 5,333.00
Orange County Health Care Agency, Environmental Health Division*	\$ 4,518.00	\$ 1,580.00	\$ 6,098.00
City of Anaheim Fire Department	\$ 424.00	\$ 148.00	\$ 572.00
Riverside County Dept. of Health, Hazardous Materials Division	\$ 4,518.00	\$ 1,580.00	\$ 6,098.00
Sacramento County Environmental Mgmt. Dept.	\$ 22,824.00	\$ 988.00	\$ 23,812.00
San Diego County Dept. of Environmental Health	\$ 26,213.00	\$ 2,173.00	\$ 28,386.00
San Joaquin County Environmental Health Department	\$ 21,836.00	\$ 642.00	\$ 22,478.00
San Mateo Co. - Environmental Health Division	\$ 1,271.00	\$ 444.00	\$ 1,715.00
Santa Clara County Dept. of Environmental Health, Haz Mat Compliance Div.	\$ 7,500.00	\$ -	\$ 7,500.00
Solano County Environmental Health Services	\$ 988.00	\$ 347.00	\$ 1,335.00
Stanislaus County Environmental Health	\$ 2,259.00	\$ 790.00	\$ 3,049.00
Yolo County Environmental Health	\$ 7,782.00	\$ 99.00	\$ 7,881.00
Total - Agency Civil Penalties	\$ 128,000.00	\$ 48,000.00	\$ 176,000.00

*ORANGE: SIX THOUSAND AND NINETY-EIGHT DOLLARS (\$6,098) is restricted to the Orange County Health Care Agency/Environmental Health and is to be placed in a special revenue account. These funds are to be used for the enhancements of the Hazardous Waste Program for special projects and other uses as determined by the Director of Environmental Health. Said payment shall be made in the form of a check made payable to the County of Orange/Auditor-

EXHIBIT E-1 - PROSECUTOR COSTS

* PLACER: The money paid to the Placer County District Attorney as costs pursuant to this stipulation, shall be for the sole and exclusive use of the District Attorney as reimbursement for costs expended in the enforcement of the consumer protection and environmental laws and in no manner shall supplant or cause any reduction of any portion of the District Attorney's budget.

**RIVERSIDE Costs: "Defendant" shall pay \$10,891.00 as costs to the Riverside County District Attorney's Office. Said sum will be paid in the form of a check made payable to the District Attorney, County of Riverside.

***SACRAMENTO: The money paid to the Sacramento District Attorney as as costs pursuant to this stipulation, shall be for the sole and exclusive use of the District Attorney as reimbursement for costs expended in the enforcement of the consumer protection and environmental laws and in no manner shall supplant or cause any reduction of any portion of the District Attorney's budget.

****YOLO: This money shall be paid in two separate checks: (1) one check addressed to the Yolo County District Attorney's Office in the amount of \$48,153.62, and (2) one check addressed to the Craig Thompson Environmental Protection Prosecution Fund in the amount of \$20,000.00.

EXHIBIT E-2 - AGENCY COSTS

Agency	Total Cost Amount to Agency
Contra Costa County Health Services Dept., Hazardous Materials Program	\$ 180.00
Fresno Co. - Community Health Dept., Environmental Health Division	\$ 1,400.00
Riverside County Dept. of Health, Hazardous Materials Division	\$ 1,750.00
Sacramento County Environmental Mgmt. Dept.	\$ 4,380.00
San Diego County Dept. of Environmental Health	\$ 5,160.00
San Joaquin County Environmental Health Department	\$ 8,580.00
San Mateo County Environmental Health	\$ 1,400.00
Solano County Environmental Health Services	\$ 700.00
Yolo County Environmental Health	\$ 1,050.00
Total - Agency Costs	\$ 24,600.00