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10 *The People of the State of California*

11 *[Additional Counsel Continued on Attachment A]*

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF ALAMEDA

14 THE PEOPLE OF THE STATE OF
CALIFORNIA,

15 Plaintiffs,

16 v.

17 DOLLAR TREE STORES, INC.,

18 a Virginia Corporation, and DOLLAR
19 TREE DISTRIBUTION, INC., a Virginia
20 Corporation

21 Defendants.
22

Case No. **15767714**

COMPLAINT FOR PERMANENT
INJUNCTION, CIVIL PENALTIES AND
OTHER EQUITABLE RELIEF

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

Exempt from fees per
Government Code §6103

23
24 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA ("People"), based on
25 information and belief, alleges as follows:

26 PLAINTIFF

27 I. The People bring this action and by and through Nancy O'Malley, District
28 Attorney of Alameda County; Todd D. Riebe, District Attorney of Amador County; Michael L.

ENDORSED
FILED
ALAMEDA COUNTY

APR 24 2015

CLERK OF THE SUPERIOR COURT
By DIANNA L. SHORE Deputy

1 Ramsey, District Attorney of Butte County; Mark A. Peterson, District Attorney of Contra
2 Costa County; Dale Trigg, District Attorney of Del Norte County; Vern Pierson, District
3 Attorney of El Dorado County; Lisa A. Smittcamp, District Attorney of Fresno County; Duane
4 Stewart, District Attorney of Glenn County; Maggie Fleming, District Attorney of Humboldt
5 County; Lisa S. Green, District Attorney of Kern County; Keith Fagundes, District Attorney of
6 Kings County; Don A. Anderson, District Attorney of Lake County; Stacey L. Montgomery,
7 District Attorney of Lassen County; Michael N. Feuer, City Attorney of Los Angeles; Jackie
8 Lacey, District Attorney of Los Angeles County; David Linn, District Attorney of Madera
9 County; Edward S. Berberian, Jr., District Attorney of Marin County; C. David Eyster, District
10 Attorney of Mendocino County; Larry D. Morse II, District Attorney of Merced County; Dean
11 D. Flippo, District Attorney of Monterey County; Clifford Newell, District Attorney of Nevada
12 County; Tony Rackauckas, District Attorney of Orange County; R. Scott Owens, District
13 Attorney of Placer County; David Hollister, District Attorney Plumas County; Mike Hestrin,
14 District Attorney of Riverside County; Anne Marie Schubert, District Attorney of Sacramento
15 County; Candice Hooper-Mancino, District Attorney of San Benito County; Michael A. Ramos,
16 District Attorney of San Bernardino County; Jan Goldsmith, City Attorney of San Diego;
17 Bonnie M. Dumanis, District Attorney of San Diego County; Tori Verber Salazar, District
18 Attorney of San Joaquin County; Dan Dow, District Attorney of San Luis Obispo County;
19 Stephen M. Wagstaffe, District Attorney of San Mateo County; Joyce E. Dudley, District
20 Attorney of Santa Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara County;
21 Jeffrey S. Rosell, District Attorney of Santa Cruz County; Stephen Carlton, District Attorney of
22 Shasta County; J. Kirk Andrus, District Attorney of Siskiyou County; Krishna A. Abrams,
23 District Attorney of Solano County; Jill R. Ravitch, District Attorney of Sonoma County; Birgit
24 A. Fladager, District Attorney of Stanislaus County; Amanda Hopper, District Attorney of
25 Sutter County; Gregg Cohen, District Attorney of Tehama County; Tim Ward, District Attorney
26 of Tulare County; Laura Krieg, District Attorney of Tuolumne County; Gregory D. Totten,
27 District Attorney of Ventura County; Jeff W. Reisig, District Attorney of Yolo County; and,
28 Patrick McGrath, District Attorney of Yuba County (collectively "Prosecutors").

1 through agents and affiliates in the State of California. Dollar Tree Stores, Inc. and Dollar Tree
2 Distribution Inc. are hereafter referred to as “Defendants” or “Dollar Tree.”

3 9. Dollar Tree does and did business in its own capacity and/or through agents
4 and affiliates in the State of California at the facilities identified in Exhibit A (hereinafter
5 collectively referred to as “California Facilities”). The California Facilities are located
6 throughout California.

7 10. The People are informed and believe, and thereon allege, that Dollar Tree is the
8 owner and/or operator of the California Facilities.

9 11. At all times relevant hereto, Dollar Tree has stocked, transported, stored and sold
10 hazardous materials at and from the California Facilities. These hazardous materials include,
11 but are not limited to, over-the-counter medications, pharmaceuticals, aerosol products,
12 ignitable liquids, batteries, electronic devices, and other toxic, reactive, ignitable and/or
13 corrosive materials. Dollar Tree also generated regulated quantities of hazardous waste at each
14 of the California Facilities as a result of various causes including, but not limited to, damage to
15 containers, spills and releases of hazardous materials, pharmaceutical waste, and various
16 hazardous wastes generated from customer returns of hazardous products.

17 12. At all times relevant hereto, Dollar Tree was and is legally responsible for
18 compliance with the provisions of the Health and Safety Code, including Chapters 6.5 and 6.95
19 of Division 20 and sections 117600, *et seq.*, at the California Facilities. The People are
20 informed and believe, and based thereon allege that, at all relevant times, Dollar Tree
21 controlled, managed, directed and was responsible for the operations of the California Facilities,
22 and/or aided and abetted, managed, directed or acted in concert with persons who exercised
23 control over those operations. The People are informed and believe, and based thereon allege,
24 that at all relevant times, Dollar Tree was legally responsible for all acts and omissions of its
25 officers, directors, agents, employees, contractors, vendors, affiliates, and/or representatives
26 relating to the management of hazardous materials and hazardous waste, and medical waste, at
27 the California Facilities, and/or that Dollar Tree failed to take appropriate steps to prevent
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1 and/or correct the violations alleged herein despite having power, authority and notice sufficient
2 to do so.

3 13. Dollar Tree is a "person," as defined in Health and Safety Code sections 25118
4 and 117745 and Business & Professions Code section 17201, and a "business," as defined in
5 Health and Safety Code section 25501, subdivision (c).

6 14. When reference is made herein to any act or omission of Dollar Tree, such
7 allegation shall include the act or omission of the owners, officers, directors, agents, employees,
8 contractors, vendors, affiliates, and/or representatives of Dollar Tree, engaged in said act or
9 omission.

10 15. The identities of DOES 1 – 25 are unknown to Plaintiff at this time. At such time
11 as the identities of DOE Defendants become known, Plaintiff will amend this Complaint
12 accordingly. DOES 1 – 25 are, and at all times relevant to the claims in this Complaint were,
13 legally responsible for compliance with the provisions of California Health and Safety Code
14 including, but not limited to, Chapters 6.5 and 6.95 of Division 20, and the corresponding
15 implementing regulations, and sections 117600, *et seq.*, in connection with the ownership and/or
16 operation of the California Facilities. Dollar Tree and DOES 1 – 25 are collectively referred to
17 herein as "Defendants."

18 16. At all times relevant hereto, DOES 1 – 25 were in a position of responsibility
19 allowing them to influence corporate policies or activities with respect to Dollar Tree's
20 compliance with California environmental laws and regulations at the California Facilities, and
21 had, by reason of their position in the limited liability company, responsibility and authority
22 either to prevent in the first instance, or promptly to correct, the violations complained of
23 herein, but failed to do so. In addition to any direct personal liability of these individuals,
24 DOES 1 – 25 also are personally liable under the "responsible corporate officer doctrine" for
25 violations of law committed by Dollar Tree as alleged herein.

26 JURISDICTION AND VENUE

27 17. Venue is proper in this County pursuant to Health and Safety Code sections
28 25183 and 25515.6, and Business and Professions Code sections 17200, *et seq.*, in that certain

1 of the violations alleged in the Complaint occurred in the County of Alameda and throughout
2 the State of California. This Court has jurisdiction pursuant to Article 6, section 10 of the
3 California Constitution and Code of Civil Procedure section 393.

4 18. Plaintiff and Dollar Tree have entered into a series of agreements to toll any
5 applicable statutes of limitation. As a result of these agreements, the period of time from
6 October 15, 2013, through April 1, 2015, inclusive (the "Tolling Period") will not be included
7 in computing the time limited by any statutes of limitation applicable to the claims covered by
8 the tolling agreement.

9 **STATUTORY AND REGULATORY BACKGROUND**

10 19. The State of California has enacted a comprehensive statutory and regulatory
11 framework for the generation, handling, treatment, storage, transportation, and disposal of
12 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and
13 Safety Code, sections 25100, *et seq.*, and its implementing regulations, which are found at Title
14 22 of the California Code of Regulations section 66260.1, *et seq.*, mandates a "cradle to grave"
15 system known as the Hazardous Waste Control Law ("HWCL"). The HWCL system is
16 maintained to record the generation, registration, tracking, storage, treatment, and disposal of
17 hazardous wastes and to provide for the protection of the public and the environment from
18 present or potential risks posed by hazardous wastes.

19 20. The HWCL is the California analog of the Federal Resource Conservation and
20 Recovery Act, 42 U.S.C. section 6901, *et seq.* ("RCRA"). Pursuant to state and federal law, the
21 California Department of Toxic Substances Control ("DTSC") administers the HWCL in lieu of
22 federal administration of RCRA in California. (See Health & Saf. Code, § 25101, subdivision
23 (d).) Federal law prohibits California from imposing "any requirements less stringent than
24 those authorized under [RCRA]." (42 U.S.C. § 6929.)

25 21. The HWCL has, in certain instances, a more inclusive definition of hazardous
26 waste than federal law. Hazardous wastes that are regulated under California law but not
27 federal law are known as "non-RCRA hazardous wastes." (Health & Saf. Code, § 25117.9.)

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1 Health and Safety Code, or for any violation of a regulation promulgated pursuant to the
2 MWMA.

3 27. Business and Professions Code section 17206 imposes civil liability for any act
4 of unfair competition, as defined in California Business and Professions Code section 17200.

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

8 29. Health and Safety Code sections 25181 and 25184 authorize the Court to issue
9 an order that enjoins any ongoing or potential violation of the HWCL, or of any applicable rule,
10 regulation, permit, standard, requirement, or order issued or promulgated pursuant to the
11 HWCL.

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

14 31. Health and Safety Code section 118325 authorizes the Court to issue an order
15 that enjoins any ongoing or potential violation of the MWMA.

16 32. Health and Safety Code sections 25184, 25515.8, and 118325 provide that in
17 civil actions brought pursuant to the HWCL, Chapter 6.95, or MWMA, respectively, in which
18 an injunction or temporary restraining order is sought, it shall not be necessary for the People to
19 allege or prove at any stage of the proceeding that irreparable damage will occur should the
20 temporary restraining order, preliminary injunction, or permanent injunction not be issued, or
21 that the remedy at law is inadequate; and the temporary restraining order, preliminary
22 injunction, or permanent injunction shall issue without such allegations and without such proof.

23 GENERAL ALLEGATIONS

24 33. At all times relevant hereto and continuing from and after the date of filing of
25 this Complaint, Defendants owned and/or operated, and continue to own and/or operate, and are
26 responsible for acts and/or omissions committed at, over 480 California Facilities throughout
27 California, including retail stores and regional distribution centers. At all times relevant hereto
28 and continuing from and after the date of filing of this Complaint, Defendants, and each of

1 them, handled at the California Facilities enormous volumes of hazardous materials including,
2 but not limited to, over-the-counter medications, bleaches, batteries, electronic devices,
3 ignitable liquids, aerosol products, oven cleaners and various other cleaning agents, and other
4 ignitable, reactive, toxic, corrosive, and biohazard materials. Most of those hazardous materials
5 are sold to the public in the ordinary course of business. However, at all times relevant hereto
6 and continuing from and after the date of filing of this Complaint, hazardous materials handled
7 by Defendants at the California Facilities were and are rendered unsalable and unusable for their
8 intended purpose as the result of spillage, breakage, expiration of sell-by dates, contamination,
9 damage to containers or labeling, and other causes, and must be handled and disposed of as
10 hazardous waste in compliance with the HWCL.

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

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

23 36. Plaintiff is informed and believes and thereupon alleges that Defendants, and
24 each of them, have violated provisions of the following statutes, including implementing
25 regulations associated with each of the statutes and any related permit, rule, standard, or
26 requirement issued or promulgated pursuant to these statutes, at the California Facilities within
27 the time period applicable to this action: Chapter 6.5 of the Health and Safety Code, sections
28 25100, *et seq.*; Chapter 6.95 of the Health and Safety Code, sections 25500, *et seq.*; Health and

1 Safety Code sections 117600, *et seq.*; Business and Professions Code sections 17200, *et seq.*;
2 and in addition, to the period of time tolled pursuant to the tolling agreements referenced in
3 paragraph 16.

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

- 9 a. Disposed of, or caused the disposal of, hazardous waste at a point not authorized,
10 in violation of Health and Safety Code sections 25189 and 25189.2, including in
11 drains at California Facilities, onto the surface or subsurface of the ground at
12 unauthorized locations, and at landfills not authorized to accept
13 commercial/retail hazardous waste and other locations not authorized to receive
14 hazardous waste;
- 15 b. Transported hazardous waste to unauthorized locations, including, without
16 limitation, Dollar Tree's distribution centers and reverse logistics vendors, in
17 violation of California Code of Regulations, title 22, section 66263.23;
- 18 c. Transported hazardous waste at, to, from, and between California Facilities on
19 vehicles that did not hold a valid registration issued by DTSC, in violation of
20 Health and Safety Code section 25163;
- 21 d. Knowingly caused to be deposited, without the permission of the owner,
22 hazardous substances upon the land of another, in violation of Penal Code
23 section 374.8, subdivision (b);
- 24 e. Failed to determine if a generated waste including, but not limited to, items
25 returned by customers to California Facilities, and wastes generated at California
26 Facilities via spills, container breakage, and other means, were hazardous wastes,
27 as required by Title 22 of the California Code of Regulations section 66262.11,
28 and, where such waste was hazardous, failed to handle the hazardous waste in

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accordance with the requirements of Chapter 6.5 of the Health and Safety Code and its implementing regulations in Title 22 of the California Code of Regulations, including, but not limited to, section 66265.172 (compatible contents), and section 66265.177 (placing incompatible waste streams in the same container);

- f. Failed to classify waste as hazardous or nonhazardous, in violation of Title 22 of the California Code of Regulations section 66260.200;
- g. Failed to determine if hazardous waste had to be treated before it could be land disposed by testing the waste or using generator knowledge of the waste, in violation of Title 22 of the California Code of Regulations section 66268.7, subdivision (a);
- h. Failed to keep records of any test results, waste analysis, or other determinations made in accordance with section 66262.11 for at least three (3) years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal, in violation of Title 22 of the California Code of Regulations, section 66262.40(c);
- i. Failed to properly manage, identify the accumulation start date, and properly label containers of hazardous waste at California Facilities, in violation of California Code of Regulations, Title 22, section 66262.34;
- j. Failed to properly manage, mark, and store hazardous waste aerosol cans, in violation of section 25201.16 of the California Health and Safety Code;
- k. Failed to use and/or maintain containers holding hazardous waste at the California Facilities so as to prevent leaks, in violation of Title 22 of the California Code of Regulations section 66265.173 and Code of Federal Regulations section 265.171;
- l. Failed to keep containers of hazardous waste closed and/or sealed, except when removing or adding hazardous waste, in violation of Title 22 of the California Code of Regulations section 66265.173;

- 1 m. Failed to comply with employee training obligations pertaining to handling of
2 hazardous waste at California Facilities, in violation of California Code of
3 Regulations, Title 22, section 66265.16.
- 4 n. Failed to obtain and keep current all required hazardous waste generator permits
5 required by county and local ordinances:
- 6 o. Treated, stored, disposed of, transported, and offered for transportation,
7 hazardous waste without having received and used a proper identification
8 number from the U.S. Environmental Protection Agency or DTSC for the
9 originating facility, in violation of Title 22 of the California Code of Regulations
10 section 66262.12, subdivision (a);
- 11 p. Accepted, treated, stored, or disposed of a hazardous waste without a hazardous
12 waste facilities permit, in violation of Health and Safety Code section 25201(a)
13 and Title 22 of the California Code of Regulations section 66270.1;
- 14 q. Stored hazardous waste onsite beyond the time permitted by law at a facility
15 which did not have a hazardous waste storage permit from DTSC, in violation of
16 Title 22 of the California Code of Regulations section 66262.34, and California
17 Health and Safety Code section 25123.3, subdivision (h);
- 18 r. Failed to retain copies of all required hazardous waste manifests for three (3)
19 years, in violation of Health and Safety Code sections 25160, subdivisions (a)
20 and (b), 25160.2, subdivision (b)(3), and Title 22 of the California Code of
21 Regulations section 66262.40, subdivision (a). As used in this paragraph,
22 “manifest” means a shipping document originated and signed by a generator of
23 hazardous waste that contains all of the information required by law and that
24 complies with all applicable federal and state regulations, and includes, but is not
25 limited to, receipts;
- 26 s. Failed to submit to DTSC a legible copy of each manifest used within thirty (30)
27 days of each shipment of hazardous waste off-site or into California, in violation
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of Title 22 of the California Code of Regulations section 66262.23, subdivision (a)(4);

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

u. Failed to submit an exception report to DTSC after the generator did not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility which was to receive the hazardous waste within forty-five (45) days of the date the waste was accepted by the initial transporter, in violation of Title 22 of the California Code of Regulations section 66262.42, subdivision (b) and Health and Safety Code section 25123.3(h)(2);

v. Failed to comply with the requirements of Title 40 of the Code of Federal Regulations, section 262.34, subdivisions (d) – (f), requiring generators to designate an employee at all times as the emergency coordinator and post the required information listed on Section 262.34, subdivision (d)(5)(i) - (iv), in violation of Title 22 of the California Code of Regulations section 66262.34, subdivision (d)(2);

w. Failed to keep a copy of each manifest signed in accordance with Title 22 of the California Code of Regulations section 66262.23, subdivision (a), for three (3) years or until the generator received a signed copy from the designated facility which received the hazardous waste, in violation of Title 22 of the California Code of Regulations section 66262.40, subdivision (a);

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- 1 x. Failed to properly manage, mark, and store universal waste, in violation of Title
2 22 of the California Code of Regulations sections 66273.13 - 66273.16 and
3 sections 66273.33 – 66273.36;
- 4 y. Failed to keep a record with the information required by section 66273.39,
5 subdivisions (a)(1) – (3), of each shipment of universal waste received at the
6 universal waste handler's facility, in violation of Title 22 of the California Code
7 of Regulations section 66273.39;
- 8 z. Failed to prepare and maintain hazardous waste manifests, in violation of
9 California Code of Regulations, Title 22, sections 66260. *et seq.*;
- 10 aa. Failed to treat returned or discarded non-empty aerosol cans at California
11 Facilities as universal waste or hazardous waste, in violation of California Code
12 of Regulations, Title 22, Chapter 23, sections 66273.1, *et seq.*;
- 13 bb. Failed to label containers of hazardous waste before transporting hazardous
14 waste from California Facilities, in violation of California Code of Regulations,
15 Title 22, section 66262.31;
- 16 cc. Failed to implement, maintain and comply with an employee training program
17 meeting the requirements of Health and Safety Code section 25505, subdivision
18 (a). and Title 19 of the California Code of Regulations section 2732, pertaining
19 to hazardous materials, and business and area plans;
- 20 dd. Failed to implement and maintain a business emergency plan for emergency
21 response to a release or threatened release of hazardous materials, in violation of
22 Health and Safety Code section 25507;
- 23 ee. Failed to implement, maintain or to submit to the administering agency (as
24 defined in Health and Safety Code sections 25501 and 25502), a complete
25 hazardous materials business plan for each California Facility, in violation of
26 Health and Safety Code sections 25505 and 25508, and section 2729 of Title 19
27 of the California Code of Regulations;

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1 ff. Failed to comply with the California MWMA, Health and Safety Code sections
2 117600, *et seq.*, by failing to have a Medical Waste Management Plan, failing to
3 retain on file disposal receipts and tracking documents for waste shipped offsite
4 for three (3) years, and improperly storing, transporting, and disposing of
5 pharmaceutical wastes;

6 gg. Allowed hazardous waste to remain, after causing its deposit, at a point not
7 authorized, without immediately filing a report of the deposit with the DTSC and
8 complying with any order by the DTSC, in violation of Health & Safety Code
9 sections 25189 subdivision (d) and 25189.2 subdivision (c).

10 hh. Disposed of or caused the disposal of hazardous waste at an unauthorized point
11 in violation of Health & Safety Code section 25189.5, subdivision (a).

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

14 **FIRST CAUSE OF ACTION**

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

17 39. Plaintiff realleges paragraphs 1 through 38, inclusive.

18 40. Health and Safety Code sections 25189 and 25189.2 prohibits the disposal, or
19 causing of the disposal, of hazardous waste at a point not authorized under Chapter 6.5. Section
20 25189(c) prohibits intentional and negligent disposal of hazardous waste at an unauthorized
21 point, and 25189.2, subdivision (c) prohibits the disposal of hazardous waste at an unauthorized
22 point as a matter of strict liability.

23 41. Defendants, and each of them, have disposed of and/or caused the disposal of
24 hazardous waste originating from the California Facilities at unauthorized points, in violation of
25 California Health and Safety Code section 25189 and 25189.2.

26 42. Each disposal of hazardous waste at an unauthorized point discovered within five
27 (5) years of commencing this action, in addition to any applicable tolling periods and those set
28 forth in paragraph 16 herein, and each day the waste was allowed to remain at such point
without the immediate filing of a report of the deposit with the DTSC, subjects Defendants to a

1 separate and additional civil penalty under Health and Safety Code section 25189 or
2 alternatively under section 25189.2.

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

6 **SECOND CAUSE OF ACTION**
7 (Unauthorized Transportation of Hazardous Waste)
8 (Health & Safety Code, §§ 25163, 25189 and 25189.2; Cal. Code Regs., Title 22, § 66263.23)

8 44. Plaintiff realleges paragraphs 1 through 43, inclusive.

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

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

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

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

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1 **THIRD CAUSE OF ACTION**

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

4 49. Plaintiff realleges paragraphs 1 through 48, inclusive.

5 50. Health and Safety Code sections 25189 and 25189.2 prohibit improper hazardous
6 waste handling and storage under Chapter 6.5.

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

14 52. Each violation of the hazardous waste handling and storage requirements that the
15 People discovered within five (5) years of commencing this action, in addition to any applicable
16 tolling periods and those set forth in paragraph 16 herein, subjects Defendants to a separate and
17 additional civil penalty under Health and Safety Code section 25189 or alternatively section
18 25189.2.

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

22 **FOURTH CAUSE OF ACTION**

23 (Violations of Hazardous Materials Release Response Plans and Inventory Laws)
24 (Health & Safety Code Chapter 6.95, §§ 25507, 25505, 25508 and 25515;
25 Cal. Code Regs., Title 19, § 2729)

25 54. Plaintiff realleges paragraphs 1 through 53, inclusive.

26 55. Chapter 6.95 of Division 20 of the Health and Safety Code requires businesses,
27 among other things, to provide training to employees and retain records, maintain hazardous
28 materials response plans and inventories, and applicable permits.

1 56. Defendants, and each of them, failed to maintain the required hazardous
2 materials response plans and inventories, training records and applicable permits required for
3 the California Facilities, and, unless enjoined by order of the Court, Defendants, and each of
4 them, may or will continue in the course of conduct as alleged herein.

5 57. Defendants, and each of them, are liable for each and every separate violation of
6 Health and Safety Code sections 25507 to 25508, inclusive, and sections 25510 to 25511
7 inclusive, and any applicable permit, rule, regulation, standard, or requirement issued or
8 promulgated pursuant thereto which occurred within five (5) years after the discovery of the
9 facts constituting grounds for commencing the action on these claims, in addition to any
10 applicable tolling periods and those set forth in paragraph 16 herein.

11 58. Based on the above, the People request injunctive relief against Defendants
12 under Health and Safety Code sections 25515.6 and 25515.8, and civil penalties as set forth in
13 Health and Safety Code section 25515, subdivisions (a) and (b), for each violation of the
14 required hazardous materials response plans and inventories and training and updating
15 requirements of Chapter 6.95 of Division 20 of the Health and Safety Code sections 25500, *et*
16 *seq.*, and its implementing regulations, at the California Facilities, as described in the People's
17 prayer for relief.

18 **FIFTH CAUSE OF ACTION**

19 (Disposal of Untreated Medical Waste)

20 (Health & Safety Code §§ 118215 subdivision (a) and 118222)

21 59. Plaintiff realleges paragraphs 1 through 58, inclusive.

22 60. Health and Safety Code sections 118215, subdivision (a) and 118222, prohibit
23 the disposal of medical waste without first treating such waste by a method specified in the
24 MWMA.

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

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1 68. Pursuant to Business and Professions Code section 17206, Defendants, and each
2 of them, are liable for civil penalties for each and every separate act of unfair competition as
3 alleged herein.

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

11 **PRAYER FOR RELIEF**

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

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

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

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

21 4. A Permanent Injunction, issued pursuant to Business and Professions Code section
22 17203, prohibiting Defendants from engaging in activity that violates the provisions of Chapters
23 6.5 and 6.95 of Division 20 of the Health and Safety Code, and Health and Safety Code sections
24 117600, *et seq.*, as alleged in this Complaint, which thereby constitute unfair competition within
25 the meaning of Business and Professions Code section 17200;

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

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

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

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

9. Plaintiff's costs of inspection, investigation, enforcement, prosecution, and suit herein; and

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

Dated: April 1, 2015

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Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|----|--------------|-------------------------------------|---------------|--------------|------------|------------|
| 1 | 5672 | 2317 BLANDING AVE | ALAMEDA | ALAMEDA | 94501-7064 | 10/1/2014 |
| 2 | 3454 | 2440 SHATTUCK AVE | BERKELEY | ALAMEDA | 94704-2023 | 10/21/2006 |
| 3 | 4885 | 1284 SAN PABLO AVENUE | BERKELEY | ALAMEDA | 94706-2218 | 6/28/2012 |
| 4 | 3014 | 7775 AMADOR VALLEY BLVD. | DUBLIN | ALAMEDA | 94568-2303 | 4/21/2006 |
| 5 | 1846 | 4949 STEVENSON BLVD, STE. G | FREMONT | ALAMEDA | 94538-2572 | 2/9/2011 |
| 6 | 1846* | 4949 STEVENSON BLVD, UNIT P | FREMONT | ALAMEDA | 94538-2572 | 2/26/2001 |
| 7 | 1264 | 20800 HESPERIAN BLVD. | HAYWARD | ALAMEDA | 94541-5805 | 5/30/1998 |
| 8 | 4118 | 31047 MISSION BLVD | HAYWARD | ALAMEDA | 94544-7601 | 7/29/2009 |
| 9 | 5130 | 22487 FOOTHILL BLVD. | HAYWARD | ALAMEDA | 94541-4024 | 5/23/2013 |
| 10 | 1250 | 1490 RAILROAD AVE. | LIVERMORE | ALAMEDA | 94550-3017 | 11/11/1996 |
| 11 | 4492 | 35233 NEWARK BLVD, STE C | NEWARK | ALAMEDA | 94560-1231 | 10/22/2010 |
| 12 | 1259 | 2445 INTERNATIONAL BLVD. | OAKLAND | ALAMEDA | 94601-1020 | 10/31/1997 |
| 13 | 5128 | 4226 ROSEWOOD DR | PLEASANTON | ALAMEDA | 94588-3000 | 1/11/2013 |
| 14 | 1387 | 15100 HESPERIAN BLVD., SUITE 114 | SAN LEANDRO | ALAMEDA | 94578-3600 | 2/18/2000 |
| 15 | 2515 | 14801 WASHINGTON AVE | SAN LEANDRO | ALAMEDA | 94578-4221 | 6/29/2003 |
| 16 | 5364 | 1933 DAVIS STREET | SAN LEANDRO | ALAMEDA | 94577-1256 | 11/15/2013 |
| 17 | 1233 | 1720 DECOTO RD. | UNION CITY | ALAMEDA | 94587-3524 | 12/10/1994 |
| 18 | 1735 | 11986 STATE HWY 88, SUITE 2060 | JACKSON | AMADOR | 95642-9472 | 8/5/2000 |
| 19 | 1227 | 801 EAST AVE, SUITE 129 | CHICO | BUTTE | 95926-1250 | 9/15/2007 |
| 20 | 1265 | 2485 NOTRE DAME BV #480 | CHICO | BUTTE | 95928-7164 | 6/14/2014 |
| 21 | 2207 | 1560 STATE HIGHWAY 99 | GRIDLEY | BUTTE | 95948-3121 | 11/13/2002 |
| 22 | 1219 | 1911 ORO DAM BLVD EAST | OROVILLE | BUTTE | 95966-5912 | 1/15/2002 |
| 23 | 2140 | 6626 CLARK RD | PARADISE | BUTTE | 95969-3547 | 4/2/2011 |
| 24 | 1740 | 2710 DELTA FAIR BLVD | ANTIOCH | CONTRA COSTA | 94509-4100 | 10/15/2000 |
| 25 | 4406 | 3305 DEER VALLEY RD. | ANTIOCH | CONTRA COSTA | 94531-6664 | 8/17/2010 |
| 26 | 3494 | 51 W SAND CREEK RD | BRENTWOOD | CONTRA COSTA | 94513-2025 | 10/28/2006 |
| 27 | 1536 | 5434 YGNACIO VALLEY ROAD, SUITE 200 | CONCORD | CONTRA COSTA | 94521-3840 | 3/28/2000 |
| 28 | 5355 | 1825 SALVIO STREET | CONCORD | CONTRA COSTA | 94520-2572 | 10/13/2013 |
| 29 | 2824* | 3517 CLAYTON RD | CONCORD | CONTRA COSTA | 94519 | 6/10/2004 |
| 30 | 3058 | 11555 SAN PABLO AVE. | EL CERRITO | CONTRA COSTA | 94530-1951 | 7/5/2005 |
| 31 | 4785 | 1047 ARNOLD DR | MARTINEZ | CONTRA COSTA | 94553 | 8/25/2012 |
| 32 | 4472 | 542 CENTER ST. | MORAGA | CONTRA COSTA | 94556-2207 | 6/5/2011 |
| 33 | 3178 | 1598 FITZGERALD DR. | PINOLE | CONTRA COSTA | 94564-2229 | 9/29/2005 |
| 34 | 1556 | 2951 RAILROAD AVE | PITTSBURG | CONTRA COSTA | 94565-5224 | 6/30/2000 |
| 35 | 4369 | 690 BAILEY RD | PITTSBURG | CONTRA COSTA | 94565-4306 | 8/18/2010 |
| 36 | 1226 | 2318 MONUMENT BLVD. | PLEASANT HILL | CONTRA COSTA | 94523-3950 | 6/30/1993 |
| 37 | 1214 | 2415 SAN PABLO DAM RD, STE 250 | SAN PABLO | CONTRA COSTA | 94806-3921 | 10/19/1994 |
| 38 | 1990 | 921 NORTHCREST DR | CRESCENT CITY | DEL NORTE | 95531-2329 | 7/16/2010 |
| 39 | 1990* | 1180 9TH STREET | CRESCENT CITY | DEL NORTE | 95531-2810 | 6/30/2001 |
| 40 | 4242 | 3386 COACH LANE | CAMERON PARK | EL DORADO | 95682-8454 | 9/19/2009 |
| 41 | 1244 | 1480 BROADWAY | PLACERVILLE | EL DORADO | 95667-5904 | 6/14/1996 |
| 42 | 1234 | 50 WEST SHAW AVENUE | CLOVIS | FRESNO | 93612-3723 | 7/28/1995 |
| 43 | 1358 | 930 HERNDON AVENUE | CLOVIS | FRESNO | 93612-0408 | 9/7/1999 |
| 44 | 5404 | 625 W HERNDON AVE | CLOVIS | FRESNO | 93612-0368 | 11/2/2013 |
| 45 | 4395 | 201 W POLK ST. | COALINGA | FRESNO | 93210-2303 | 8/8/2010 |
| 46 | 1217 | 4982 E KINGS CANYON RD. | FRESNO | FRESNO | 93727-3896 | 9/18/1997 |
| 47 | 1231 | 4474 WEST SHAW AVE | FRESNO | FRESNO | 93710-6210 | 5/28/2005 |
| 48 | 1232 | 5265 NORTH BLACKSTONE AVE | FRESNO | FRESNO | 93710-6703 | 6/9/1999 |
| 49 | 1239 | 5666 E KINGS CANYON RD | FRESNO | FRESNO | 93727-4627 | 3/15/2002 |
| 50 | 1241 | 3300 EAST TULARE AVE | FRESNO | FRESNO | 93702-2727 | 4/20/1996 |
| 51 | 1261 | 4021 EAST ASHLAN AVENUE | FRESNO | FRESNO | 93726-3734 | 4/13/1998 |
| 52 | 1730 | 6728 NORTH CEDAR AVENUE | FRESNO | FRESNO | 93710-4403 | 7/31/2000 |
| 53 | 1964 | 3730 NORTH BLACKSTONE AVE | FRESNO | FRESNO | 93726-5306 | 6/29/2001 |
| 54 | 2093 | 3780 W SHIELDS AVE | FRESNO | FRESNO | 93722-6702 | 2/17/2004 |
| 55 | 2600 | 917 E. OLIVE AVENUE | FRESNO | FRESNO | 93728-3417 | 2/1/2004 |
| 56 | 3676 | 1544 E. CHAMPLAIN DR, SUITE 105 | FRESNO | FRESNO | 93720-5627 | 7/5/2007 |
| 57 | 2955 | 15156 W WHITESBRIDGE AVE | KERMAN | FRESNO | 93630-1019 | 10/30/2004 |
| 58 | 2811 | 967 WEST MANNING AVE | REEDLEY | FRESNO | 93654-2446 | 8/27/2005 |
| 59 | 4299 | 2656 JENSEN AVE | SANGER | FRESNO | 93657-9777 | 1/31/2010 |
| 60 | 1517 | 3380 FLORAL AVE | SELMA | FRESNO | 93662-9040 | 8/14/2000 |
| 61 | 5361 | 1028 SOUTH STREET | ORLAND | GLENN | 95963-1672 | 10/15/2013 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|------------------------------|-----------------|-------------|------------|------------|
| 62 | 5496 | 460 N HUMBOLT AVE. | WILLOWS | GLENN | 95988-2612 | 5/1/2014 |
| 63 | 1845 | 5000 VALLEY W BLVD, SPACE 10 | ARCATA | HUMBOLDT | 95521-4646 | 3/25/2001 |
| 64 | 1945 | 1111 MYRTLE AVE., SUITE 5 | EUREKA | HUMBOLDT | 95501-4000 | 10/25/2001 |
| 65 | 3770 | 800 W HARRIS ST, SUITE 5 | EUREKA | HUMBOLDT | 95503-3929 | 9/20/2007 |
| 66 | 1561* | 3300 BROADWAY STE 804 | EUREKA | HUMBOLDT | 95501 | 5/2/2000 |
| 67 | 1878* | 727 S. FORTUNA BLVD | FORTUNA | HUMBOLDT | 95540-3034 | 4/26/2001 |
| 68 | 1878* | 721 S. FORTUNA BLVD | FORTUNA | HUMBOLDT | 95540-3040 | 7/17/2014 |
| 69 | 3061 | 283 MAIN ST., #C | BRAWLEY | IMPERIAL | 92227-2350 | 6/12/2005 |
| 70 | 2850 | 2340 N. IMPERIAL AVE #1 | CALEXICO | IMPERIAL | 92231-2340 | 9/12/2004 |
| 71 | 3748 | 2300 N COTTONWOOD DR | EL CENTRO | IMPERIAL | 92243-1600 | 11/2/2007 |
| 72 | 3752 | 3509 SOUTH DOGWOOD RD | EL CENTRO | IMPERIAL | 92243-4605 | 2/3/2008 |
| 73 | 3870 | 904 BEAR MOUNTAIN BLVD | ARVIN | KERN | 93203-1302 | 3/6/2009 |
| 74 | 1247 | 4456 MING AVENUE | BAKERSFIELD | KERN | 93309-4800 | 9/21/1996 |
| 75 | 1255 | 731 AIRPORT DRIVE | BAKERSFIELD | KERN | 93308-4129 | 7/25/1997 |
| 76 | 1262 | 2505 SOUTH H STREET | BAKERSFIELD | KERN | 93304-5605 | 5/8/1998 |
| 77 | 1267 | 6151 NILES STREET | BAKERSFIELD | KERN | 93306-4689 | 10/28/1998 |
| 78 | 2121 | 7890 WHITE LANE | BAKERSFIELD | KERN | 93309-7670 | 2/28/2002 |
| 79 | 2287 | 1721 GOLDEN STATE AVENUE | BAKERSFIELD | KERN | 93301-1009 | 9/30/2002 |
| 80 | 2759 | 2717 CALLOWAY DRIVE | BAKERSFIELD | KERN | 93312-2618 | 3/1/2004 |
| 81 | 2964 | 5430 STOCKDALE HIGHWAY | BAKERSFIELD | KERN | 93309-2502 | 11/24/2004 |
| 82 | 5793 | 1505 COLUMBUS ST | BAKERSFIELD | KERN | 93305-2132 | 2/28/2015 |
| 83 | 5814 | 4725 PANAMA LANE, UNIT D6 | BAKERSFIELD | KERN | 93313-3408 | 1/15/2015 |
| 84 | 1484 | 625 CECIL AVE | DELANO | KERN | 93215-2023 | 2/3/2000 |
| 85 | 5627 | 720 WOOLLOMES AVE. | DELANO | KERN | 93215-9552 | 7/18/2014 |
| 86 | 2958 | 10212 MAIN STREET | LAMONT | KERN | 93241-1705 | 10/30/2004 |
| 87 | 2177 | 100 NORTH CHINA LAKE BLV | RIDGECREST | KERN | 93555-3916 | 6/30/2002 |
| 88 | 3774 | 305 GARDNER FIELD RD | TAFT | KERN | 93268-9726 | 7/22/2008 |
| 89 | 2430 | 844 TUCKER ROAD | TEHACHAPI | KERN | 93561-2530 | 4/30/2004 |
| 90 | 3296 | 2701 HIGHWAY 46 | WASCO | KERN | 93280-2912 | 2/4/2007 |
| 91 | 1246 | 1818 WEST LACEY BLVD. | HANFORD | KINGS | 93230-7382 | 8/16/1996 |
| 92 | 2195 | 95 W. HANFORD ARMONA RD. | LEMOORE | KINGS | 93245-2319 | 5/7/2003 |
| 93 | 4447 | 14804 OLYMPIC DR | CLEARLAKE | LAKE | 95422-9521 | 8/12/2010 |
| 94 | 1242 | 1305 SOUTH MAIN ST. | LAKEPORT | LAKE | 95453-5520 | 5/4/1996 |
| 95 | 1392 | 2545 MAIN STREET | SUSANVILLE | LASSEN | 96130-4709 | 5/30/2009 |
| 96 | 1882 | 820 EAST VALLEY BLVD. | ALHAMBRA | LOS ANGELES | 91801-5225 | 5/28/2001 |
| 97 | 4252 | 131 E FOOTHILL BLVD. | ARCADIA | LOS ANGELES | 91006-2506 | 3/27/2010 |
| 98 | 4575 | 11837 ARTESIA BLVD | ARTESIA | LOS ANGELES | 90701-4002 | 4/16/2011 |
| 99 | 4304 | 1642 PUENTE AVE. | BALDWIN PARK | LOS ANGELES | 91706-5952 | 2/5/2010 |
| 100 | 4568 | 4259 MAINE AVE | BALDWIN PARK | LOS ANGELES | 91706-3312 | 2/26/2011 |
| 101 | 4023 | 6207 ATLANTIC AVE | BELL | LOS ANGELES | 90201-1225 | 11/21/2008 |
| 102 | 3977 | 6810 EASTERN AVE, STE F | BELL GARDENS | LOS ANGELES | 90201-3928 | 10/13/2008 |
| 103 | 5780 | 10237 ROSECRANS BLVD. | BELLFLOWER | LOS ANGELES | 90706-2601 | 1/5/2015 |
| 104 | 3826 | 20936 ROSCOE BLVD. | CANOGA PARK | LOS ANGELES | 91304-4308 | 2/27/2008 |
| 105 | 5475 | 170 E. CARSON STREET | CARSON | LOS ANGELES | 90745-2702 | 11/15/2014 |
| 106 | 4290 | 31876 CASTAIC RD. | CASTAIC | LOS ANGELES | 91384-3943 | 2/8/2010 |
| 107 | 4814 | 11855 DEL AMO BLVD | CERRITOS | LOS ANGELES | 90703-7605 | 4/4/2012 |
| 108 | 4886 | 17504 CARMENITA AVENUE. | CERRITOS | LOS ANGELES | 90703-8635 | 8/17/2014 |
| 109 | 4956 | 1210 N. LONG BEACH BLVD | COMPTON | LOS ANGELES | 90221-1600 | 8/4/2012 |
| 110 | 5484 | 1789 S. ALAMEDA STREET | COMPTON | LOS ANGELES | 90220-4977 | 5/3/2014 |
| 111 | 1918 | 410 N. AZUSA AVE. | COVINA | LOS ANGELES | 91722-3610 | 8/26/2006 |
| 112 | 4946 | 1045 N GRAND AVE | COVINA | LOS ANGELES | 91724-2048 | 2/7/2013 |
| 113 | 4187 | 11455 JEFFERSON BLVD | CULVER CITY | LOS ANGELES | 90230-6105 | 6/18/2009 |
| 114 | 4312 | 8330 FIRESTONE BLVD | DOWNEY | LOS ANGELES | 90241-3842 | 5/8/2010 |
| 115 | 5758 | 10227 LAKEWOOD BLVD | DOWNEY | LOS ANGELES | 90241-2741 | 10/4/2014 |
| 116 | 1747 | 1207 HUNTINGTON DRIVE | DUARTE | LOS ANGELES | 91010-2485 | 10/15/2000 |
| 117 | 2017 | 11910 VALLEY BLVD | EL MONTE | LOS ANGELES | 91732 | 10/31/2001 |
| 118 | 4846 | 14700 CRENSHAW BLVD. | GARDENA | LOS ANGELES | 90249-3602 | 2/10/2012 |
| 119 | 5460 | 1310 W ROSECRANS AVE. | GARDENA | LOS ANGELES | 90247-2420 | 4/5/2014 |
| 120 | 5695 | 13039 HAWTHORNE BLVD | HAWTHORNE | LOS ANGELES | 90250-4415 | 10/4/2014 |
| 121 | 4584 | 5817 N FIGUEROA ST | HIGHLAND PARK | LOS ANGELES | 90042-4227 | 4/4/2011 |
| 122 | 3763 | 7610 S ALAMEDA STREET | HUNTINGTON PARK | LOS ANGELES | 90255-3744 | 4/5/2008 |
| 123 | 5379 | 2525 E GAGE AVE. | HUNTINGTON PARK | LOS ANGELES | 90255-4017 | 3/1/2014 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|--------------------------------|-----------------|-------------|------------|------------|
| 124 | 4860 | 4747 W. CENTURY BLVD | INGLEWOOD | LOS ANGELES | 90304-1441 | 5/25/2012 |
| 125 | 4896 | 11278 CRENSHAW BLVD. | INGLEWOOD | LOS ANGELES | 90303-2805 | 3/20/2012 |
| 126 | 4995 | 811 N LA BREA AVE | INGLEWOOD | LOS ANGELES | 90302-3641 | 3/18/2013 |
| 127 | 5426 | 13936 IMPERIAL HIGHWAY | LA MIRADA | LOS ANGELES | 90638-1725 | 11/1/2013 |
| 128 | 4621 | 1381 N HACIENDA BLVD. | LA PUENTE | LOS ANGELES | 91744-1611 | 4/23/2011 |
| 129 | 5257 | 1475 FOOTHILL BLVD | LA VERNE | LOS ANGELES | 91750-3451 | 9/24/2013 |
| 130 | 4273 | 5825 BELLFLOWER BLVD | LAKEWOOD | LOS ANGELES | 90713-1057 | 3/25/2010 |
| 131 | 1540 | 1061 E AVENUE J | LANCASTER | LOS ANGELES | 93535-3849 | 2/24/2005 |
| 132 | 4509 | 1101 W AVENUE I, STE 105 | LANCASTER | LOS ANGELES | 93534-2245 | 2/22/2011 |
| 133 | 5445 | 2041 W. AVENUE K | LANCASTER | LOS ANGELES | 93536-5217 | 4/3/2014 |
| 134 | 5298 | 4181 REDONDO BEACH BLVD. | LAWNDALE | LOS ANGELES | 90260-3340 | 5/3/2014 |
| 135 | 3885 | 6426 E. SPRING ST. | LONG BEACH | LOS ANGELES | 90815-1553 | 5/3/2008 |
| 136 | 4129 | 8111 E WARDLOW ROAD | LONG BEACH | LOS ANGELES | 90808-3204 | 4/23/2009 |
| 137 | 4671 | 1480 ALAMITOS AVE | LONG BEACH | LOS ANGELES | 90813-2213 | 7/1/2011 |
| 138 | 4095 | 426 S ALVARADO ST. | LOS ANGELES | LOS ANGELES | 90057-2902 | 7/30/2009 |
| 139 | 4201 | 4953 WHITTIER BLVD. | LOS ANGELES | LOS ANGELES | 90022-3114 | 3/13/2010 |
| 140 | 4711 | 5710 CRENSHAW BOULEVARD | LOS ANGELES | LOS ANGELES | 90043-2410 | 9/2/2011 |
| 141 | 4949 | 2850 E. OLYMPIC BLVD | LOS ANGELES | LOS ANGELES | 90023-3412 | 6/15/2012 |
| 142 | 4993 | 3148 W PICO BLVD. | LOS ANGELES | LOS ANGELES | 90019-4711 | 7/21/2014 |
| 143 | 5013 | 3710 S. LA BREA AVENUE, UNIT A | LOS ANGELES | LOS ANGELES | 90016-5310 | 10/27/2012 |
| 144 | 5441 | 1007 CYPRESS AVE | LOS ANGELES | LOS ANGELES | 90065-1136 | 11/16/2013 |
| 145 | 5489 | 2700 N. BROADWAY. | LOS ANGELES | LOS ANGELES | 90031-2610 | 2/21/2014 |
| 146 | 5490 | 4617 HUNTINGTON DR. N | LOS ANGELES | LOS ANGELES | 90032-1919 | 4/11/2014 |
| 147 | 5542 | 2035 -2055 VENICE BLVD. | LOS ANGELES | LOS ANGELES | 90006-5222 | 11/15/2014 |
| 148 | 5595 | 5057 W WASHINGTON BLVD | LOS ANGELES | LOS ANGELES | 90016-1450 | 1/17/2015 |
| 149 | 5810 | 4300 SOUTH CENTRAL AVE | LOS ANGELES | LOS ANGELES | 90049 | 11/15/2014 |
| 150 | 4556 | 4160 LINCOLN BLVD. | MARINA DEL REY | LOS ANGELES | 90292-5616 | 2/20/2011 |
| 151 | 1040 | 828 BEVERLY BOULEVARD | MONTEBELLO | LOS ANGELES | 90640-4213 | 6/30/2000 |
| 152 | 3255 | 2305 S GARFIELD AVENUE | MONTEREY PARK | LOS ANGELES | 91754-7219 | 1/29/2006 |
| 153 | 4775 | 720 S ATLANTIC BLVD. | MONTEREY PARK | LOS ANGELES | 91754-3859 | 10/29/2011 |
| 154 | 3907 | 12809 SHERMAN WAY | N HOLLYWOOD | LOS ANGELES | 91605-5034 | 4/18/2008 |
| 155 | 4959 | 23788 NEWHALL AVENUE | NEWHALL | LOS ANGELES | 91321-3125 | 10/13/2012 |
| 156 | 4517 | 6120 LANKERSHIM BLVD. | NORTH HOLLYWOOD | LOS ANGELES | 91606-4808 | 11/15/2010 |
| 157 | 4989 | 9040 TAMPA AVE. | NORTHRIDGE | LOS ANGELES | 91324-3523 | 9/5/2012 |
| 158 | 5195 | 8254 WHITE OAK AVE, UNIT 1 | NORTHRIDGE | LOS ANGELES | 91325-4300 | 9/11/2013 |
| 159 | 2993 | 13913 PIONEER BLVD. | NORWALK | LOS ANGELES | 90650-3921 | 2/26/2005 |
| 160 | 1535 | 222 EAST PALMDALE BLVD | PALMDALE | LOS ANGELES | 93550-4515 | 7/17/2000 |
| 161 | 4235 | 4616 EAST AVENUE S | PALMDALE | LOS ANGELES | 93552-4418 | 1/31/2010 |
| 162 | 3004 | 8418 VAN NUYS BLVD. | PANORAMA CITY | LOS ANGELES | 91402-3610 | 4/1/2005 |
| 163 | 5302 | 181 S ROSEMEAD BLVD | PASADENA | LOS ANGELES | 91107-3955 | 7/4/2013 |
| 164 | 4358 | 8790 WASHINGTON BLVD. | PICO RIVERA | LOS ANGELES | 90660-3793 | 5/1/2010 |
| 165 | 5866 | 9425 TELEGRAPH ROAD, SUITE 116 | PICO RIVERA | LOS ANGELES | 90660-5553 | 2/10/2015 |
| 166 | 5392 | 305 E FOOTHILL BOULEVARD | POMONA | LOS ANGELES | 91767-1405 | 1/20/2014 |
| 167 | 3076 | 1206 BERYL STREET | REDONDO BEACH | LOS ANGELES | 90277-2427 | 5/6/2005 |
| 168 | 5187 | 2218 ARTESIA BLVD | REDONDO BEACH | LOS ANGELES | 90278-3112 | 6/14/2013 |
| 169 | 1084 | 19337 VICTORY BOULEVARD | RESEDA | LOS ANGELES | 91335-6302 | 9/17/2000 |
| 170 | 2951* | 18225 SHERMAN WAY | RESEDA | LOS ANGELES | 91335 | 10/30/2004 |
| 171 | 4362 | 3566 ROSEMEAD BLVD | ROSEMEAD | LOS ANGELES | 91770-2053 | 7/31/2010 |
| 172 | 1968 | 17440 COLIMA ROAD | ROWLAND HEIGHTS | LOS ANGELES | 91748-1632 | 6/30/2001 |
| 173 | 2883 | 156 E BONITA AVENUE, SUITE C-3 | SAN DIMAS | LOS ANGELES | 91773-3080 | 11/5/2004 |
| 174 | 2976 | 900 SAN FERNANDO RD. | SAN FERNANDO | LOS ANGELES | 91340-3311 | 11/1/2004 |
| 175 | 4858 | 1505 SOUTH PACIFIC AVENUE | SAN PEDRO | LOS ANGELES | 90731-4887 | 5/26/2012 |
| 176 | 5596 | 1505 SOUTH PACIFIC AVENUE | SAN PEDRO | LOS ANGELES | 90731-4887 | 11/15/2014 |
| 177 | 1783 | 19339 SOLEDAD CANYON RD | SANTA CLARITA | LOS ANGELES | 91351-2630 | 10/28/2000 |
| 178 | 4313 | 3075 CALIFORNIA AVE | SIGNAL HILL | LOS ANGELES | 90755-5101 | 1/31/2010 |
| 179 | 4445 | 3638 TWEEDY BLVD. | SOUTH GATE | LOS ANGELES | 90280-6044 | 11/23/2010 |
| 180 | 5689 | 8914 GLENOAKS BLVD | SUN VALLEY | LOS ANGELES | 91352-2037 | 10/23/2014 |
| 181 | 2966 | 855 SEPULVEDA BLVD | TORRANCE | LOS ANGELES | 90502-3003 | 11/24/2004 |
| 182 | 3791 | 1431 W. KNOX ST STE 400 | TORRANCE | LOS ANGELES | 90501-1360 | 3/6/2008 |
| 183 | 4644 | 23126 HAWTHORNE BLVD | TORRANCE | LOS ANGELES | 90505-3705 | 6/30/2011 |
| 184 | 5132 | 22217 PALOS VERDES BLVD, STE 2 | TORRANCE | LOS ANGELES | 90505-2016 | 3/3/2013 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|-------------------------------------|---------------------|-------------|------------|------------|
| 185 | 4243 | 6540 FOOTHILL BLVD., UNIT 109 & 110 | TUJUNGA | LOS ANGELES | 91042-2764 | 9/13/2009 |
| 186 | 4042 | 23152 VALENCIA BLVD. | VALENCIA | LOS ANGELES | 91355-1716 | 12/11/2008 |
| 187 | 4668 | 12144 MAGNOLIA BLVD. | VALLEY VILLAGE | LOS ANGELES | 91607-2620 | 6/25/2011 |
| 188 | 5294 | 6108 N. SEPULVEDA BLVD. | VAN NUYS | LOS ANGELES | 91411-2503 | 8/31/2013 |
| 189 | 2971* | 6711 VAN NUYS BLVD | VAN NUYS | LOS ANGELES | 91405-4620 | 11/1/2004 |
| 190 | 3707 | 20655 AMAR RD. | WALNUT | LOS ANGELES | 91789-5037 | 8/1/2007 |
| 191 | 3186 | 501 S VINCENT AVE | WEST COVINA | LOS ANGELES | 91790-6712 | 7/18/2006 |
| 192 | 4712 | 2851 E EASTLAND CENTER DR, STE 11 | WEST COVINA | LOS ANGELES | 91791-1671 | 9/22/2011 |
| 193 | 1973 | 6454 PLATT AVENUE | WEST HILLS | LOS ANGELES | 91307-3216 | 8/7/2001 |
| 194 | 2956 | 8514 PAINTER AVENUE #J | WHITTIER | LOS ANGELES | 90602-3335 | 10/30/2004 |
| 195 | 5087 | 11217 WHITTIER BLVD | WHITTIER | LOS ANGELES | 90606-1433 | 4/19/2013 |
| 196 | 5299 | 1119 W PACIFIC COAST HWY | WILMINGTON | LOS ANGELES | 90744-2425 | 10/17/2014 |
| 197 | 1220 | 2140 WEST CLEVELAND AVE, STE 116 | MADERA | MADERA | 93637-8757 | 11/6/2008 |
| 198 | 1220* | 2121 WEST CLEVELAND AVE | MADERA | MADERA | 93637-8721 | 8/25/1992 |
| 199 | 4566 | 40015 HIGHWAY 49, STE 301 | OAKHURST | MADERA | 93644-8804 | 7/1/2011 |
| 200 | 3480 | 455 ENTRADA RD | NOVATO | MARIN | 94949-5518 | 7/20/2007 |
| 201 | 4393 | 928 DIABLO AVE | NOVATO | MARIN | 94947-4025 | 7/1/2010 |
| 202 | 4724 | 825 FRANCISCO BLVD W | SAN RAFAEL | MARIN | 94901-5307 | 11/23/2011 |
| 203 | 4080 | 120 DONAHUE ST | SAUSALITO | MARIN | 94965-1250 | 2/1/2009 |
| 204 | 5853 | 189 BOATYARD DRIVE | FORT BRAGG | MENDOCINO | 95437-5741 | 1/16/2015 |
| 205 | 4060 | 1395 N STATE ST, STE. A | UKIAH | MENDOCINO | 95482-3476 | 3/25/2009 |
| 206 | 2939 | 1710 S MAIN ST. | WILLITS | MENDOCINO | 95490-4405 | 11/19/2004 |
| 207 | 3259 | 500 EAST BELLEVUE ROAD | ATWATER | MERCED | 95301-2339 | 4/13/2007 |
| 208 | 4770 | 1261 COMMERCE AVE, STE B | ATWATER | MERCED | 95301-5223 | 9/27/2011 |
| 209 | 1256 | 1423 W PACHECO BLVD | LOS BANOS | MERCED | 93635-7806 | 10/8/2009 |
| 210 | 1256* | 1321 E PACHECO BLVD, STE B | LOS BANOS | MERCED | 93635-4335 | 6/27/1997 |
| 211 | 1222 | 1115 W MAIN ST | MERCED | MERCED | 95340-4522 | 7/25/2010 |
| 212 | 1222* | 1218 WEST OLIVE AVENUE | MERCED | MERCED | 95348-1662 | 5/29/2001 |
| 213 | 5491 | 239 HUERTA AVE. | GREENFIELD | MONTEREY | 93927-5762 | 3/30/2014 |
| 214 | 2953 | 520 CANAL STREET, SUITE B | KING CITY | MONTEREY | 93930-3446 | 10/30/2004 |
| 215 | 4202 | 215 RESERVATION RD, SUITE H | MARINA | MONTEREY | 93933-3059 | 10/30/2009 |
| 216 | 1389 | 1441 N. MAIN ST | SALINAS | MONTEREY | 93906-2403 | 11/19/1999 |
| 217 | 3632 | 1553 N. SANBORN RD | SALINAS | MONTEREY | 93905-4717 | 10/2/2007 |
| 218 | 5852 | 1235 N DAVIS ROAD | SALINAS | MONTEREY | 93907-1996 | 1/30/2015 |
| 219 | 2183 | 1816 FREMONT BLVD | SEASIDE | MONTEREY | 93955-3611 | 4/27/2002 |
| 220 | 2260 | 762A FREEMAN LANE | GRASS VALLEY | NEVADA | 95949-9622 | 7/3/2014 |
| 221 | 1924 | 1811 W LINCOLN AVE | ANAHEIM | ORANGE | 92801-6731 | 6/30/2001 |
| 222 | 4725 | 1238 S MAGNOLIA AVE. | ANAHEIM | ORANGE | 92804-5116 | 10/28/2011 |
| 223 | 5131 | 1021 N STATE COLLEGE BLV | ANAHEIM | ORANGE | 92806-2774 | 8/1/2013 |
| 224 | 3262 | 8321 LA PALMA AVENUE | BUENA PARK | ORANGE | 90620-3207 | 3/14/2006 |
| 225 | 4788 | 8930 VALLEY VIEW ST | BUENA PARK | ORANGE | 90620-3531 | 10/31/2011 |
| 226 | 5864 | 7540 ORANGETHORPE AVE, SUITE A3 | BUENA PARK | ORANGE | 90621-3458 | 1/30/2015 |
| 227 | 4525 | 34077 DOHENY PARK RD | CAPISTRANO BEACH | ORANGE | 92624-1106 | 3/8/2011 |
| 228 | 5335 | 2230 FAIRVIEW ROAD, UNIT D | COSTA MESA | ORANGE | 92627-7808 | 9/20/2013 |
| 229 | 1823 | 6887 KATELLA AVENUE | CYPRESS | ORANGE | 90630-5107 | 3/28/2001 |
| 230 | 1871 | 16141 HARBOR BLVD | FOUNTAIN VALLEY | ORANGE | 92708-1305 | 6/28/2001 |
| 231 | 4370 | 17876 NEWHOPE ST. | FOUNTAIN VALLEY | ORANGE | 92708-5431 | 7/20/2010 |
| 232 | 5010 | 17930 MAGNOLIA STREET | FOUNTAIN VALLEY | ORANGE | 92708-5039 | 8/4/2012 |
| 233 | 2039 | 221 ORANGEFAIR MALL | FULLERTON | ORANGE | 92832-3038 | 10/31/2001 |
| 234 | 4437 | 2465 E CHAPMAN AVE | FULLERTON | ORANGE | 92831-3603 | 8/22/2010 |
| 235 | 2053 | 9679 CHAPMAN AVENUE | GARDEN GROVE | ORANGE | 92841-2706 | 10/18/2001 |
| 236 | 4678 | 13171 HARBOR BLVD. | GARDEN GROVE | ORANGE | 92843-1717 | 10/29/2011 |
| 237 | 5053 | 18595 BEACH BLVD. | HUNTINGTON BEACH | ORANGE | 92648-2053 | 10/27/2012 |
| 238 | 1954 | 1230 WEST IMPERIAL HWY | LA HABRA | ORANGE | 90631-6987 | 10/15/2001 |
| 239 | 4845 | 1279 EAST LA HABRA BLVD | LA HABRA | ORANGE | 90631-5637 | 4/26/2012 |
| 240 | 4021 | 24401 ALICIA PKWY, SUITE D | MISSION VIEJO | ORANGE | 92691-4537 | 11/26/2008 |
| 241 | 5706 | 23042 ALICIA PARKWAY | MISSION VIEJO | ORANGE | 92692-1636 | 10/4/2014 |
| 242 | 2325 | 1421 W. CHAPMAN AVE. | ORANGE | ORANGE | 92868-2703 | 6/10/2011 |
| 243 | 4933 | 784 N TUSTIN ST. | ORANGE | ORANGE | 92867-7129 | 10/18/2012 |
| 244 | 5341 | 31878 DEL OBISPO ST., SUITE 125 | SAN JUAN CAPISTRANO | ORANGE | 92675-3253 | 8/3/2013 |
| 245 | 2981 | 1900 N GRAND AVENUE #B | SANTA ANA | ORANGE | 92705-7038 | 11/24/2004 |
| 246 | 4530 | 3309 S BRISTOL ST, STE A | SANTA ANA | ORANGE | 92704-7262 | 10/30/2010 |

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| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|---------------------|--------------------------------|----------------|---------------|------------|---------------|
| 247 | 4714 | 631 S. MAIN ST, STE A | SANTA ANA | ORANGE | 92701-5715 | 9/10/2011 |
| 248 | 5023 | 13960 SEAL BEACH BLVD | SEAL BEACH | ORANGE | 90740-5301 | 9/8/2012 |
| 249 | 4758 | 17271 17TH STREET | TUSTIN | ORANGE | 92780-1951 | 11/19/2011 |
| 250 | 2474 | 6741 WESTMINSTER BLVD | WESTMINSTER | ORANGE | 92683-8060 | 5/3/2003 |
| 251 | 4307 | 15400 GOLDENWEST ST | WESTMINSTER | ORANGE | 92683-6149 | 4/2/2010 |
| 252 | 1212 | 2136 GRASS VALLEY HWY | AUBURN | PLACER | 95603-2522 | 2/4/2007 |
| 253 | 4415 | 6861 DOUGLAS BLVD. | GRANITE BAY | PLACER | 95746-6259 | 9/25/2010 |
| 254 | 5422 | 53 LINCOLN BLVD. | LINCOLN | PLACER | 95648-6313 | 11/1/2013 |
| 255 | 1848 | 6005 PACIFIC STREET | ROCKLIN | PLACER | 95677-3423 | 5/26/2001 |
| 256 | 3960 | 6656 LONETREE BLVD #E | ROCKLIN | PLACER | 95765-3735 | 7/13/2008 |
| 257 | 1248 | 108 B HARDING BLVD | ROSEVILLE | PLACER | 95678-2805 | 10/18/1996 |
| 258 | 3223 | 5170 FOOTHILLS BLVD | ROSEVILLE | PLACER | 95747-6583 | 1/29/2006 |
| 259 | 1521 | 50 EAST MAIN STREET | QUINCY | PLUMAS | 95971-9701 | 9/16/2003 |
| 260 | 4690 | 3403 W RAMSEY ST., STE A | BANNING | RIVERSIDE | 92220-3501 | 6/25/2011 |
| 261 | 3621 | 1486 E 2ND STREET | BEAUMONT | RIVERSIDE | 92223-3160 | 8/31/2007 |
| 262 | 3552 | 661 W HOBSON WAY | BLYTHE | RIVERSIDE | 92225-1512 | 11/8/2006 |
| 263 | 4216 | 68401 E. PALM CANYON DR. | CATHEDRAL CITY | RIVERSIDE | 92234-5461 | 9/1/2009 |
| 264 | 2216 | 125 N MCKINLEY STREET | CORONA | RIVERSIDE | 92879-6566 | 6/29/2002 |
| 265 | 2972 | 1220 MAGNOLIA AVE #101 | CORONA | RIVERSIDE | 92881-2067 | 11/1/2004 |
| 266 | 4545 | 281 S LINCOLN AVE | CORONA | RIVERSIDE | 92882-1855 | 1/30/2011 |
| 267 | 4605 | 2751 GREEN RIVER RD, STE 101 | CORONA | RIVERSIDE | 92882-7425 | 4/21/2011 |
| 268 | 2954 | 1420 EAST FLORIDA AVENUE | HEMET | RIVERSIDE | 92544-8624 | 10/30/2004 |
| 269 | 4120 | 1167 S SANDERSON AVE. | HEMET | RIVERSIDE | 92545-9047 | 8/29/2009 |
| 270 | 5279 | 43372 STATE HWY. 74 | HEMET | RIVERSIDE | 92544-7200 | 8/3/2013 |
| 271 | 4121 | 82025 HWY 111 STE 101 | INDIO | RIVERSIDE | 92201-5686 | 4/18/2010 |
| 272 | 4209 | 42225 JACKSON ST. # A102 | INDIO | RIVERSIDE | 92203-9303 | 2/20/2010 |
| 273 | 5594 | 79700 HIGHWAY 111 | LA QUINTA | RIVERSIDE | 92253-4538 | 7/22/2014 |
| 274 | 3898 | 29229 CENTRAL AVE #C | LAKE ELSINORE | RIVERSIDE | 92532-2248 | 3/7/2008 |
| 275 | 5401 | 32275 MISSION TRAIL | LAKE ELSINORE | RIVERSIDE | 92530-4530 | 11/2/2013 |
| 276 | 4400 | 30133 ANTELOPE RD | MENIFEE | RIVERSIDE | 92584-8067 | 7/2/2010 |
| 277 | 5415 | 26932 CHERRY HILLS BLVD. | MENIFEE | RIVERSIDE | 92586-2574 | 1/13/2014 |
| 278 | 3135 | 12320 PERRIS BLVD., UNIT 8 | MORENO VALLEY | RIVERSIDE | 92557-7423 | 10/7/2005 |
| 279 | 4073 | 12625 FREDERICK ST. D2 | MORENO VALLEY | RIVERSIDE | 92553-5216 | 2/1/2009 |
| 280 | 5061 | 26150 IRIS AVENUE STE 16 | MORENO VALLEY | RIVERSIDE | 92555-3010 | 11/12/2012 |
| 281 | 5497 | 25050 ALESSANDRO BLVD | MORENO VALLEY | RIVERSIDE | 92553-4313 | 4/5/2014 |
| 282 | 2326 | 40565 CALIFORNIA OAKS RD | MURRIETA | RIVERSIDE | 92562-5855 | 9/30/2002 |
| 283 | 4396 | 39865 ALTA MURRIETA DR | MURRIETA | RIVERSIDE | 92563-5439 | 7/31/2010 |
| 284 | 4353 | 2748 HAMNER AVE, STE 107 | NORCO | RIVERSIDE | 92860-1994 | 4/30/2010 |
| 285 | 2022 | 42245 WASHINGTON STREET | PALM DESERT | RIVERSIDE | 92211-8023 | 9/28/2001 |
| 286 | 4620 | 72630 DINAH SHORE DR., STE 100 | PALM DESERT | RIVERSIDE | 922110801 | 5/7/2011 |
| 287 | 3598 | 1717 E VISTA CHINO, SUITE J | PALM SPRINGS | RIVERSIDE | 92262-3569 | 5/19/2008 |
| 288 | 2980 | 2560 N PERRIS BLVD. | PERRIS | RIVERSIDE | 92571-3249 | 11/17/2004 |
| 289 | 1803 | 7790 LIMONITE AVE | RIVERSIDE | RIVERSIDE | 92509-5314 | 6/26/2004 |
| 290 | 2244 | 4074 & 4076 MADISON ST | RIVERSIDE | RIVERSIDE | 92504-2642 | 9/9/2002 |
| 291 | 2770 | 4033 CHICAGO AVENUE, #B | RIVERSIDE | RIVERSIDE | 92507-5337 | 6/16/2004 |
| 292 | 2977 | 3590 TYLER STREET, STE B (105) | RIVERSIDE | RIVERSIDE | 92503-4133 | 2/1/2009 |
| 293 | 5354 | 4712 LA SIERRA AVENUE | RIVERSIDE | RIVERSIDE | 92505-2799 | 1/26/2014 |
| 294 | 2977* | 5612 VAN BUREN | RIVERSIDE | RIVERSIDE | 92503-8036 | 11/1/2004 |
| 295 | 4294 | 26455 YNEZ RD | TEMECULA | RIVERSIDE | 92591-4654 | 11/9/2009 |
| 296 | 4730 | 31741 TEMECULA PKWY., SUITE A1 | TEMECULA | RIVERSIDE | 92592-6800 | 10/20/2011 |
| 297 | 1209 | 4005 MANZANITA AVE #32 | CARMICHAEL | SACRAMENTO | 95608-1783 | 10/30/2001 |
| 298 | 1202 | 7313 GREENBACK LANE | CITRUS HEIGHTS | SACRAMENTO | 95621-5530 | 11/19/1990 |
| 299 | 2119 | 7840 MACY PLAZA DRIVE | CITRUS HEIGHTS | SACRAMENTO | 95610-6802 | 3/25/2002 |
| 300 | 2236 | 7859 LICHEN DRIVE | CITRUS HEIGHTS | SACRAMENTO | 95621-1074 | 5/30/2002 |
| 301 | 2922 | 7000 SUNRISE BLVD | CITRUS HEIGHTS | SACRAMENTO | 95610-3102 | 1/30/2005 |
| 302 | 1213 | 8696 ELK GROVE BLVD., SUITE 11 | ELK GROVE | SACRAMENTO | 95624-3301 | 4/20/1999 |
| 303 | 3447 | 8126 SHELDON ROAD | ELK GROVE | SACRAMENTO | 95758-5928 | 5/5/2007 |
| 304 | 1268 | 8852 MADISON AVENUE | FAIR OAKS | SACRAMENTO | 95628-3908 | 11/20/1998 |
| 305 | 1228 | 627 E BIDWELL STREET | FOLSOM | SACRAMENTO | 95630-3120 | 8/15/2007 |
| 306 | 5786 | 25000 BLUE RAVINE RD.. | FOLSOM | SACRAMENTO | 95630-5723 | 10/30/2014 |
| 307 | 2271 | 10410 TWIN CITIES RD | GALT | SACRAMENTO | 95632-9032 | 1/11/2003 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|------------------------------------|------------------|----------------|------------|------------|
| 308 | 1201 | 3661 ELKHORN BLVD | NORTH HIGHLANDS | SACRAMENTO | 95660-3730 | 10/27/2003 |
| 309 | 5225 | 4720 WATT AVE. | NORTH HIGHLANDS | SACRAMENTO | 95660-5516 | 8/11/2013 |
| 310 | 1223* | 3222 WINONA WAY | NORTH HIGHLANDS | SACRAMENTO | 95660-5523 | 10/30/1992 |
| 311 | 1205 | 10337 FOLSOM BOULEVARD | RANCHO CORDOVA | SACRAMENTO | 95670-3518 | 8/6/1992 |
| 312 | 5316 | 2342 SUNRISE BLVD., STE 31 | RANCHO CORDOVA | SACRAMENTO | 95670-4372 | 9/23/2013 |
| 313 | 1203 | 5051 FRUITRIDGE RD. | SACRAMENTO | SACRAMENTO | 95820-5433 | 7/26/2007 |
| 314 | 1204 | 6650 VALLEY HI DRIVE | SACRAMENTO | SACRAMENTO | 95823-4602 | 12/1/1994 |
| 315 | 1229 | 7020 STOCKTON BLVD. | SACRAMENTO | SACRAMENTO | 95823-2312 | 12/1/2006 |
| 316 | 1976 | 3308 ARDEN WAY | SACRAMENTO | SACRAMENTO | 95825-2017 | 7/31/2001 |
| 317 | 2041 | 3615 NORTHGATE BLVD | SACRAMENTO | SACRAMENTO | 95834-1600 | 5/31/2002 |
| 318 | 2545 | 1347 FLORIN ROAD | SACRAMENTO | SACRAMENTO | 95831-3618 | 6/30/2003 |
| 319 | 3566 | 6710 FOLSOM BLVD. | SACRAMENTO | SACRAMENTO | 95819-4626 | 2/14/2007 |
| 320 | 4481 | 1235 S STREET | SACRAMENTO | SACRAMENTO | 95811-7111 | 7/15/2011 |
| 321 | 4670 | 4910 FREEPORT BLVD | SACRAMENTO | SACRAMENTO | 95822-2153 | 11/10/2011 |
| 322 | 4726 | 1895 HOWE AVE. | SACRAMENTO | SACRAMENTO | 95825-1025 | 9/22/2011 |
| 323 | 5211 | 2000 CLUB CENTER DRIVE, SUITE 100 | SACRAMENTO | SACRAMENTO | 95835-1423 | 8/12/2013 |
| 324 | 5580 | 2540 WATT AVENUE | SACRAMENTO | SACRAMENTO | 95821-6312 | 5/31/2014 |
| 325 | 2048* | 560 TRES PINOS RD | HOLLISTER | SAN BENITO | 95023-5566 | 9/28/2001 |
| 326 | 4280 | 20346 HWY. 18, UNIT 400 | APPLE VALLEY | SAN BERNARDINO | 92307-2923 | 1/31/2010 |
| 327 | 3035 | 1264 E MAIN ST | BARSTOW | SAN BERNARDINO | 92311-2409 | 5/28/2005 |
| 328 | 2959 | 42168 BIG BEAR BLVD. | BIG BEAR LAKE | SAN BERNARDINO | 92315 | 3/16/2011 |
| 329 | 2518 | 11975 CENTRAL AVE. | CHINO | SAN BERNARDINO | 91710-1906 | 7/20/2003 |
| 330 | 3134 | 4200 CHINO HILLS PKWY, STE 760 | CHINO HILLS | SAN BERNARDINO | 91709-3776 | 6/24/2006 |
| 331 | 4682 | 12949 PEYTON DR | CHINO HILLS | SAN BERNARDINO | 91709-6015 | 6/20/2011 |
| 332 | 3078 | 1157 MT. VERNON AVENUE | COLTON | SAN BERNARDINO | 92324-2577 | 2/26/2010 |
| 333 | 3078* | 1250 E WASHINGTON STREET, STE B | COLTON | SAN BERNARDINO | 92324-6434 | 4/30/2005 |
| 334 | 1808 | 9976 B SIERRA AVENUE | FONTANA | SAN BERNARDINO | 92335-1715 | 11/14/2000 |
| 335 | 4014 | 16953 SIERRA LAKES PKWY, SUITE 104 | FONTANA | SAN BERNARDINO | 92336-1272 | 3/11/2009 |
| 336 | 5189 | 15232 SUMMIT AVENUE | FONTANA | SAN BERNARDINO | 92336-0231 | 5/4/2013 |
| 337 | 4450 | 22455 BARTON RD. | GRAND TERRACE | SAN BERNARDINO | 92313-5008 | 9/15/2010 |
| 338 | 2961 | 15759 MAIN STREET | HESPERIA | SAN BERNARDINO | 92345-3410 | 11/17/2004 |
| 339 | 1899 | 4040 HIGHLAND AVE | HIGHLAND | SAN BERNARDINO | 92346-2637 | 4/12/2001 |
| 340 | 5759 | 25670 REDLANDS BLVD | LOMA LINDA | SAN BERNARDINO | 92354 | 10/5/2014 |
| 341 | 3648 | 1100 E. BROADWAY | NEEDLES | SAN BERNARDINO | 92363-3809 | 2/13/2008 |
| 342 | 4506 | 131 E RIVERSIDE DR. | ONTARIO | SAN BERNARDINO | 91761-6624 | 11/23/2010 |
| 343 | 4734 | 4468 ONTARIO MILLS PKWY. | ONTARIO | SAN BERNARDINO | 91764-5107 | 8/15/2011 |
| 344 | 2445 | 9743 BASELINE ROAD | RANCHO CUCAMONGA | SAN BERNARDINO | 91730-1408 | 3/17/2003 |
| 345 | 1773 | 1366 INDUSTRIAL PARK AVE | REDLANDS | SAN BERNARDINO | 92374-2897 | 4/23/2011 |
| 346 | 1773* | 811 TRI CITY CENTER DRIVE | REDLANDS | SAN BERNARDINO | 92374-2859 | 10/1/2000 |
| 347 | 4929 | 182 E BASE LINE ROAD | RIALTO | SAN BERNARDINO | 92376-3607 | 4/26/2012 |
| 348 | 5119 | 761 W 2ND ST, SUITE A | SAN BERNARDINO | SAN BERNARDINO | 92410-3260 | 1/22/2013 |
| 349 | 5366 | 2084 E HIGHLAND AVENUE | SAN BERNARDINO | SAN BERNARDINO | 92404-4626 | 2/15/2014 |
| 350 | 5855 | 1035 W HIGHLAND AVE | SAN BERNARDINO | SAN BERNARDINO | 92405-3207 | 2/28/2015 |
| 351 | 99909A | 1761 INTERCHANGE DRIVE | SAN BERNARDINO | SAN BERNARDINO | 92407 | 4/1/2010 |
| 352 | 99909B | 1651 INTERCHANGE DRIVE | SAN BERNARDINO | SAN BERNARDINO | 92407 | 4/1/2013 |
| 353 | 4043 | 71737 29 PALMS HWY. | TWENTYNINE PALMS | SAN BERNARDINO | 92277-2084 | 11/20/2008 |
| 354 | 3440 | 180 S MOUNTAIN AVE. | UPLAND | SAN BERNARDINO | 91786-6256 | 11/19/2006 |
| 355 | 5754 | 1387 EAST FOOTHILL BLVD. | UPLAND | SAN BERNARDINO | 91786 | 11/24/2014 |
| 356 | 1504 | 12160 HESPERIA RD, STE B | VICTORVILLE | SAN BERNARDINO | 92395-5820 | 2/6/2005 |
| 357 | 1855 | 14792 LA PAZ DRIVE | VICTORVILLE | SAN BERNARDINO | 92395-4006 | 10/31/2001 |
| 358 | 5519 | 14325 US HIGHWAY 395 | VICTORVILLE | SAN BERNARDINO | 92394-9591 | 10/1/2014 |
| 359 | 3241 | 58100 29 PALMS HWY | YUCCA VALLEY | SAN BERNARDINO | 92284-5802 | 4/17/2008 |
| 360 | 4616 | 2754 ALPINE BLVD. | ALPINE | SAN DIEGO | 91901-2225 | 6/28/2011 |
| 361 | 2521 | 1838 MARRON ROAD #E | CARLSBAD | SAN DIEGO | 92008-1172 | 11/2/2003 |
| 362 | 4996 | 1218 BROADWAY | CHULA VISTA | SAN DIEGO | 91911-2911 | 11/5/2012 |
| 363 | 5034 | 941 OTAY LAKES RD | CHULA VISTA | SAN DIEGO | 91913-3002 | 10/22/2012 |
| 364 | 3207 | 796 FLETCHER PKWY | EL CAJON | SAN DIEGO | 92020-1816 | 10/26/2005 |
| 365 | 5502 | 400 N SECOND ST. | EL CAJON | SAN DIEGO | 92021-6446 | 8/30/2014 |
| 366 | 4162 | 218 N. EL CAMINO REAL | ENCINITAS | SAN DIEGO | 92024-2847 | 4/30/2009 |
| 367 | 2324 | 628 N. ESCONDIDO BLVD. | ESCONDIDO | SAN DIEGO | 92025-1702 | 9/29/2002 |
| 368 | 2982* | 1349 EAST VALLEY PWY | ESCONDIDO | SAN DIEGO | 92027-2311 | 11/17/2004 |
| 369 | 2982* | 1229 E VALLEY PKWY | ESCONDIDO | SAN DIEGO | 92027-2309 | 2/27/2014 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|---------------------|-----------------------------------|-----------------|-----------------|------------|---------------|
| 370 | 3958 | 1071 S MAIN AVENUE | FALLBROOK | SAN DIEGO | 92028-3338 | 6/26/2008 |
| 371 | 3757 | 5500 GROSSMONT CENTER DR, STE 428 | LA MESA | SAN DIEGO | 91942-3016 | 8/10/2007 |
| 372 | 5543 | 12340 WOODSIDE AVENUE | LAKESIDE | SAN DIEGO | 92040-3016 | 6/14/2014 |
| 373 | 2889 | 6 NORTH EUCLID AVENUE | NATIONAL CITY | SAN DIEGO | 91950-1934 | 9/30/2004 |
| 374 | 2507 | 4161 OCEANSIDE BLVD, SUITE C | OCEANSIDE | SAN DIEGO | 92056-6035 | 5/30/2003 |
| 375 | 3883 | 3825 PLAZA DRIVE #501 | OCEANSIDE | SAN DIEGO | 92056-4624 | 4/4/2008 |
| 376 | 4941 | 1810 OCEANSIDE BLVD | OCEANSIDE | SAN DIEGO | 92054-3474 | 1/4/2013 |
| 377 | 4988 | 3861 MISSION AVE, SUITE B-13 | OCEANSIDE | SAN DIEGO | 92058-1877 | 8/11/2012 |
| 378 | 5041 | 12624 POWAY RD. #2 | POWAY | SAN DIEGO | 92064-4440 | 9/22/2012 |
| 379 | 5003 | 1853 MAIN STREET, STE J | RAMONA | SAN DIEGO | 92065-2512 | 7/28/2012 |
| 380 | 2965 | 3398 MURPHY CANYON RD | SAN DIEGO | SAN DIEGO | 92123-2654 | 11/24/2004 |
| 381 | 3821 | 6503 UNIVERSITY AVE | SAN DIEGO | SAN DIEGO | 92115-5810 | 11/3/2007 |
| 382 | 4271 | 8230 MIRA MESA BLVD., SUITE E | SAN DIEGO | SAN DIEGO | 92126-2625 | 10/23/2009 |
| 383 | 5274 | 4240 KEARNY MESA RD, SUITE 109 | SAN DIEGO | SAN DIEGO | 92111-3769 | 7/3/2013 |
| 384 | 5716 | 3337 ROSECRANS STREET | SAN DIEGO | SAN DIEGO | 92110-4223 | 10/30/2014 |
| 385 | 5733 | 2483 IMPERIAL AVENUE | SAN DIEGO | SAN DIEGO | 92102-3916 | 1/4/2015 |
| 386 | 5854 | 4792 CLAIREMONT MESA BLVD | SAN DIEGO | SAN DIEGO | 92117-2006 | 3/20/2015 |
| 387 | 5182 | 4520 CAMINO DE LA PLAZA | SAN YSIDRO | SAN DIEGO | 92173-3104 | 3/2/2013 |
| 388 | 3194 | 262 TOWN CENTER PKWY | SANTEE | SAN DIEGO | 92071-5803 | 10/26/2005 |
| 389 | 3195 | 9805 CAMPO RD, STE 197 | SPRING VALLEY | SAN DIEGO | 91977-1410 | 11/15/2005 |
| 390 | 4939 | 651 SWEETWATER ROAD | SPRING VALLEY | SAN DIEGO | 91977-5628 | 4/24/2012 |
| 391 | 2575 | 1090 E VISTA WAY | VISTA | SAN DIEGO | 92084-4602 | 11/8/2003 |
| 392 | 4552 | 1611 S MELROSE DR, STE G | VISTA | SAN DIEGO | 92081-5407 | 6/15/2011 |
| 393 | 5531 | 2400 MCHENRY AVENUE | ESCALON | SAN JOAQUIN | 95320-9602 | 6/23/2014 |
| 394 | 4403 | 125 LAKEWOOD MALL | LODI | SAN JOAQUIN | 95242-2924 | 5/24/2010 |
| 395 | 1238 | 1259 WEST YOSEMITE AVE. | MANTECA | SAN JOAQUIN | 95337-5125 | 11/11/1995 |
| 396 | 2189 | 1389 E. YOSEMITE AVE. | MANTECA | SAN JOAQUIN | 95336-5003 | 6/29/2002 |
| 397 | 1240 | 678 N WILSON WAY, STE 37 | STOCKTON | SAN JOAQUIN | 95205-4269 | 2/24/1996 |
| 398 | 1260 | 3728 E. HAMMER LANE #1 | STOCKTON | SAN JOAQUIN | 95212-2811 | 11/1/2003 |
| 399 | 1263 | 4555 NORTH PERSHING AVE. #17 | STOCKTON | SAN JOAQUIN | 95207-6740 | 7/17/1998 |
| 400 | 3771 | 7528 PACIFIC AVE | STOCKTON | SAN JOAQUIN | 95207-1929 | 9/13/2007 |
| 401 | 5193 | 10408 TRINITY PKWY STE A | STOCKTON | SAN JOAQUIN | 95219-7225 | 7/25/2013 |
| 402 | 5403 | 1209 E MARCH LANE | STOCKTON | SAN JOAQUIN | 95210-3546 | 10/25/2013 |
| 403 | 5525 | 3538 MANTHEY RD. | STOCKTON | SAN JOAQUIN | 95206-5304 | 11/10/2014 |
| 404 | 99004 | 1122 RUNWAY DRIVE | STOCKTON | SAN JOAQUIN | 92506 | 1/1/2000 |
| 405 | 2983 | 2691 N TRACY BLVD. | TRACY | SAN JOAQUIN | 95376-1716 | 11/24/2004 |
| 406 | 1943 | 1400 E GRAND AVE, STE A | ARROYO GRANDE | SAN LUIS OBISPO | 93420-2424 | 3/30/2004 |
| 407 | 3631 | 2040 EL CAMINO REAL | ATASCADERO | SAN LUIS OBISPO | 93422-1542 | 5/9/2007 |
| 408 | 3246 | 710 QUINTANA RD | MORRO BAY | SAN LUIS OBISPO | 93442-1940 | 1/29/2006 |
| 409 | 2293 | 2173 THEATER DR | PASO ROBLES | SAN LUIS OBISPO | 93446 | 8/31/2002 |
| 410 | 1485 | 3870 BROAD STREET, BOX 12 | SAN LUIS OBISPO | SAN LUIS OBISPO | 93401-7172 | 2/28/2000 |
| 411 | 4409 | 491 MADONNA RD., STE 3 | SAN LUIS OBISPO | SAN LUIS OBISPO | 93405-6541 | 5/28/2010 |
| 412 | 2782 | 516 EL CAMINO REAL | BELMONT | SAN MATEO | 94002-2121 | 6/30/2004 |
| 413 | 4429 | 735 SERRAMONTE BLVD. | COLMA | SAN MATEO | 94014-3221 | 8/19/2010 |
| 414 | 4735 | 2840 GENEVA AVE. | DALY CITY | SAN MATEO | 94014-1523 | 9/23/2011 |
| 415 | 3847 | 787 HICKEY BLVD | PACIFICA | SAN MATEO | 94044-1214 | 3/3/2008 |
| 416 | 5544 | 312 WALNUT STREET | REDWOOD CITY | SAN MATEO | 94063-1718 | 5/3/2014 |
| 417 | 3275 | 555 EL CAMINO REAL | S SAN FRANCISCO | SAN MATEO | 94080-4402 | 12/2/2006 |
| 418 | 4505 | 1121 OLD COUNTY RD | SAN CARLOS | SAN MATEO | 94070-4009 | 10/1/2010 |
| 419 | 1502 | 1009 NORTH H STREET, STE. S | LOMPOC | SANTA BARBARA | 93436-3304 | 8/21/2007 |
| 420 | 1827 | 1647 NORTH BROADWAY | SANTA MARIA | SANTA BARBARA | 93454-1925 | 1/18/2001 |
| 421 | 5806 | 525 S BLOSSER RD | SANTA MARIA | SANTA BARBARA | 93458-4909 | 2/28/2015 |
| 422 | 3203 | 150 N SAN TOMAS AQUINO ROAD | CAMPBELL | SANTA CLARA | 95008-1620 | 11/5/2005 |
| 423 | 3238 | 2425 S WINCHESTER BLVD | CAMPBELL | SANTA CLARA | 95008-4801 | 4/15/2006 |
| 424 | 2274 | 1260 1ST STREET | GILROY | SANTA CLARA | 95020-4734 | 8/30/2002 |
| 425 | 1236 | 1350 S PARK VICTORIA DR #10 | MILPITAS | SANTA CLARA | 95035-6941 | 10/24/1995 |
| 426 | 4293 | 251 RANCH DRIVE | MILPITAS | SANTA CLARA | 95035-5106 | 11/4/2009 |
| 427 | 2785 | 16975 MONTEREY RD | MORGAN HILL | SANTA CLARA | 95037-5134 | 4/30/2004 |
| 428 | 4978 | 199 E MIDDLEFIELD RD, STE 200 | MOUNTAIN VIEW | SANTA CLARA | 94043-3806 | 9/26/2012 |
| 429 | 1254 | 331 N CAPITOL AVENUE | SAN JOSE | SANTA CLARA | 95133 | 4/19/1997 |
| 430 | 1270 | 5546 MONTEREY RD. | SAN JOSE | SANTA CLARA | 95138-1529 | 1/19/2000 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|-------------------------------------|---------------|-------------|------------|------------|
| 431 | 2083 | 5540 SNELL AVE | SAN JOSE | SANTA CLARA | 95123-1651 | 11/14/2001 |
| 432 | 3185 | 5041 ALMADEN EXPY | SAN JOSE | SANTA CLARA | 95118-2008 | 11/16/2005 |
| 433 | 3764 | 1178 N. CAPITOL AVE | SAN JOSE | SANTA CLARA | 95132-2522 | 10/17/2007 |
| 434 | 3823 | 14406 UNION ROAD | SAN JOSE | SANTA CLARA | 95124-2815 | 5/10/2008 |
| 435 | 3853 | 916 STORY RD | SAN JOSE | SANTA CLARA | 95122-2629 | 3/21/2008 |
| 436 | 4681 | 2155 TULLY RD. | SAN JOSE | SANTA CLARA | 95122-1346 | 8/26/2011 |
| 437 | 5212 | 2585 ALMADEN RD | SAN JOSE | SANTA CLARA | 95125-3603 | 5/20/2013 |
| 438 | 5488 | 3065 MERIDIAN AVE. | SAN JOSE | SANTA CLARA | 95124-2455 | 7/25/2014 |
| 439 | 5522 | 2222 BUSINESS CIRCLE | SAN JOSE | SANTA CLARA | 95128-1619 | 3/27/2014 |
| 440 | 4547 | 3024 EL CAMINO REAL | SANTA CLARA | SANTA CLARA | 95051-2909 | 1/30/2011 |
| 441 | 3725 | 588 E. EL CAMINO REAL | SUNNYVALE | SANTA CLARA | 94087-1940 | 11/8/2007 |
| 442 | 5081 | 1950 41ST AVE. | CAPITOLA | SANTA CRUZ | 95010-2507 | 9/17/2012 |
| 443 | 3689 | 2-1515 EAST CLIFF DR | SANTA CRUZ | SANTA CRUZ | 95062-4844 | 11/9/2007 |
| 444 | 3759 | 266-B MT. HERMON RD | SCOTTS VALLEY | SANTA CRUZ | 95066-4010 | 9/30/2007 |
| 445 | 1519 | 1075 S GREEN VALLEY ROAD | WATSONVILLE | SANTA CRUZ | 95076-4164 | 4/29/2000 |
| 446 | 5233 | 1010 MAIN STREET | WATSONVILLE | SANTA CRUZ | 95076-3732 | 5/16/2014 |
| 447 | 1857 | 2611 BALLS FERRY ROAD | ANDERSON | SHASTA | 96007-3507 | 3/8/2001 |
| 448 | 5903 | 1725 STATE HWY 273 | ANDERSON | SHASTA | 96007-4233 | 2/28/2015 |
| 449 | 4797 | 9384 DESCHUTES RD, STE F | PALO CEDRO | SHASTA | 96073-7703 | 10/16/2011 |
| 450 | 1221 | 2385 ATHENS AVENUE | REDDING | SHASTA | 96001-2818 | 8/14/1992 |
| 451 | 1252 | 40 LAKE BOULEVARD | REDDING | SHASTA | 96003-2512 | 1/30/1997 |
| 452 | 5256 | 2991 CHURN CREEK RD | REDDING | SHASTA | 96002-1120 | 7/9/2013 |
| 453 | 5400 | 6478 WESTSIDE RD. | REDDING | SHASTA | 96001-4867 | 11/15/2013 |
| 454 | 1251 | 1828 FORT JONES ROAD | YREKA | SISKIYOU | 96097-9531 | 11/22/1996 |
| 455 | 5179 | 856 SOUTHAMPTON RD. | BENICIA | SOLANO | 94510-1907 | 5/4/2013 |
| 456 | 4943 | 1700 N 1ST STREET | DIXON | SOLANO | 95620-9766 | 6/29/2012 |
| 457 | 2341 | 2425 N. TEXAS STREET | FAIRFIELD | SOLANO | 94533-1603 | 11/1/2002 |
| 458 | 3973 | 250 SUNSET AVENUE, STE. A | SUISUN CITY | SOLANO | 94585-1766 | 9/24/2008 |
| 459 | 1235 | 230 PEABODY RD. | VACAVILLE | SOLANO | 95687-4733 | 9/27/2013 |
| 460 | 1235* | 991 ALAMO DRIVE | VACAVILLE | SOLANO | 95687-5601 | 8/19/1995 |
| 461 | 1210 | 3475 SONOMA BLVD. | VALLEJO | SOLANO | 94590-2921 | 9/25/1992 |
| 462 | 4131 | 938 ADMIRAL CALLAGHAN LN | VALLEJO | SOLANO | 94591-3680 | 8/19/2009 |
| 463 | 5290 | 640 EAST COTATI AVENUE | COTATI | SONOMA | 94931-4026 | 11/9/2013 |
| 464 | 2262 | 1041 VINE ST. | HEALDSBURG | SONOMA | 95448-4829 | 7/31/2002 |
| 465 | 5022 | 40 E. WASHINGTON STREET | PETALUMA | SONOMA | 94952-3115 | 8/19/2012 |
| 466 | 1868 | 4675 REDWOOD DRIVE | ROHNERT PARK | SONOMA | 94928-7941 | 3/15/2001 |
| 467 | 2162 | 777 SEBASTOPOL RD | SANTA ROSA | SONOMA | 95407-6827 | 9/27/2002 |
| 468 | 2168 | 2747 YULUPA AVE | SANTA ROSA | SONOMA | 95405-8534 | 6/13/2002 |
| 469 | 4593 | 3589 INDUSTRIAL DR. | SANTA ROSA | SONOMA | 95403-2012 | 4/13/2011 |
| 470 | 5851 | 3080 Marlow Rd, Suite A-11 | SANTA ROSA | SONOMA | 95403-7950 | 1/31/2015 |
| 471 | 3827 | 18615 SONOMA HWY #103 | SONOMA | SONOMA | 95476-4400 | 3/1/2008 |
| 472 | 5269 | 6748 E WHITMORE AVE | HUGHSON | STANISLAUS | 95326-8903 | 7/14/2013 |
| 473 | 1216 | 2225 PLAZA PKWY # H | MODESTO | STANISLAUS | 95350-6220 | 9/8/2006 |
| 474 | 1258 | 1330 E HATCH RD | MODESTO | STANISLAUS | 95351-5011 | 8/14/1997 |
| 475 | 1266 | 2425 B MCHENRY AVENUE | MODESTO | STANISLAUS | 95350-3217 | 8/13/1998 |
| 476 | 2351 | 2601 OAKDALE RD. | MODESTO | STANISLAUS | 95355-2256 | 4/20/2008 |
| 477 | 2459 | 1620 STANDIFORD AVENUE | MODESTO | STANISLAUS | 95350-0578 | 11/18/2004 |
| 478 | 1574 | 111 S. MAAG AVENUE, SUITE E | OAKDALE | STANISLAUS | 95361-7604 | 2/1/2009 |
| 479 | 3737 | 1065 SPERRY AVE, STE A | PATTERSON | STANISLAUS | 95363-9266 | 2/3/2008 |
| 480 | 2840 | 2250 PATTERSON ROAD | RIVERBANK | STANISLAUS | 95367-9647 | 11/18/2004 |
| 481 | 3953 | 3045 N TEGNER ROAD | TURLOCK | STANISLAUS | 95380-9447 | 4/24/2009 |
| 482 | 4832 | 2094 E. CANAL DR | TURLOCK | STANISLAUS | 95380-4302 | 3/10/2012 |
| 483 | 4613 | 12118 YOSEMITE BLVD, STE. 7 | WATERFORD | STANISLAUS | 95386-9534 | 4/11/2011 |
| 484 | 1218 | 1460 BRIDGE STREET | YUBA CITY | SUTTER | 95993-3506 | 10/10/1991 |
| 485 | 2486 | 1936 SOLANO STREET | CORNING | TEHAMA | 96021-2831 | 5/3/2003 |
| 486 | 1230 | 398 SOUTH MAIN STREET | RED BLUFF | TEHAMA | 96080-4314 | 11/13/1993 |
| 487 | 3184 | 1401 W EL MONTE WAY, STE. 130 | DINUBA | TULARE | 93618-9165 | 7/29/2006 |
| 488 | 5237 | 424 N KAWEAH AVE | EXETER | TULARE | 93221-1224 | 9/10/2013 |
| 489 | 3493 | 1555 N FARMERSVILLE BLVD, SUITE 201 | FARMERSVILLE | TULARE | 93223-1175 | 3/15/2007 |
| 490 | 5234 | 258 N HWY 65 | LINDSAY | TULARE | 93247 | 8/31/2013 |
| 491 | 1245 | 1373 WEST HENDERSON AVE. | PORTERVILLE | TULARE | 93257-1456 | 7/5/1996 |

Exhibit A - California Dollar Tree Facilities

| | FACILITY NO. | ADDRESS | CITY | COUNTY | ZIP | OPENED |
|-----|--------------|----------------------------------|-----------------|----------|------------|------------|
| 492 | 1207 | 130 EAST CROSS AVE. | TULARE | TULARE | 93274-2850 | 10/9/1997 |
| 493 | 1253 | 2333 SOUTH MOONEY BLVD | VISALIA | TULARE | 93277-6228 | 2/28/1997 |
| 494 | 4142 | 1927 N DINUBA BLVD | VISALIA | TULARE | 93291-3011 | 10/16/2009 |
| 495 | 2122 | 13771 MONO WAY, SUITE D | SONORA | TUOLUMNE | 95370-2820 | 2/21/2002 |
| 496 | 5599 | 2291 PICKWICK DRIVE | CAMARILLO | VENTURA | 93010-6409 | 7/2/2014 |
| 497 | 3753 | 745 VENTURA RD | FILLMORE | VENTURA | 93015-1834 | 2/29/2008 |
| 498 | 5464 | 543-B W LOS ANGELES AVE. | MOORPARK | VENTURA | 93021-1707 | 5/3/2014 |
| 499 | 4223 | 737 N. WENDY DRIVE | NEWBURY PARK | VENTURA | 91320-3066 | 10/16/2009 |
| 500 | 2237 | 838 NORTH VENTURA ROAD | OXNARD | VENTURA | 93030-4414 | 3/31/2003 |
| 501 | 4687 | 150 W LAUREL ST. | OXNARD | VENTURA | 93033-4561 | 10/1/2011 |
| 502 | 3874 | 729 W CHANNEL ISLAND BOULEVARD | PORT HUENEME | VENTURA | 93041-2130 | 2/3/2008 |
| 503 | 2963 | 588 WEST MAIN STREET, BLDG A | SANTA PAULA | VENTURA | 93060-3209 | 11/23/2004 |
| 504 | 2585 | 2970 COCHRAN ST. | SIMI VALLEY | VENTURA | 93065-2784 | 11/1/2003 |
| 505 | 3999 | 1760 N MOORPARK RD | THOUSAND OAKS | VENTURA | 91360-5133 | 1/29/2012 |
| 506 | 4315 | 4738 TELEPHONE RD, STE 2 | VENTURA | VENTURA | 93003-5245 | 3/12/2010 |
| 507 | 3475 | 1800 E. 8TH STREET | DAVIS | YOLO | 95616-2502 | 9/3/2006 |
| 508 | 1215 | 3015 WEST CAPITAL AVENUE | WEST SACRAMENTO | YOLO | 95691-2912 | 4/7/2003 |
| 509 | 5241 | 2105 TOWN CENTER PLAZA, STE F120 | WEST SACRAMENTO | YOLO | 95691-4991 | 6/24/2013 |
| 510 | 1206 | 18 WEST COURT STREET | WOODLAND | YOLO | 95695-3012 | 3/18/1994 |
| 511 | 4760 | 441 PIONEER AVE, STE. 110 | WOODLAND | YOLO | 95776-5189 | 9/16/2011 |
| 512 | 1211 | 1409 B STREET | MARYSVILLE | YUBA | 95901-4211 | 4/26/1997 |

*These stores were either closed or relocated by Dollar Tree Stores, Inc. prior to the date of this Complaint.