

FILED
SUPERIOR COURT-STOCKTON

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STEPHANIE BOHRER, CLERK

BY MIA STIPE
DEPUTY

1 RONALD J. FREITAS
2 San Joaquin County District Attorney
3 CELESTE KAISCH, SBN 234174
4 Deputy District Attorney
5 Consumer and Environmental Crimes Unit
6 222 E. Weber Ave., Room 202
7 Stockton, CA 95202
8 Telephone: (209) 468-2400
9 Facsimile: (209) 468-0314
10 Email: Celeste.Kaisch@sjcda.org

11 [Additional Plaintiff's Counsel Listed on Attachment A]

12 *Attorneys for The People of the State of California*

13 **SUPERIOR COURT OF CALIFORNIA**

14 **COUNTY OF SAN JOAQUIN**

STK-CV-UBT-2024 1154

15 THE PEOPLE OF THE STATE OF CALIFORNIA,)

Case No..

16 Plaintiff,

Assigned to for all purposes to:

17

18 vs.

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

19 TESLA, INC., a Delaware Corporation,

20 Defendant.

*Exempt from fees per Gov.
Code § 6103*

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

23 **PLAINTIFF**

24 1. The People bring this action by and through Ronald J. Freitas, District Attorney
25 of San Joaquin County; Pamela Y. Price, District Attorney of Alameda County; Michael L.
26 Ramsey, District Attorney of Butte County; Diana Becton, District Attorney of Contra Costa
27 County; Lisa A. Smittcamp, District Attorney of Fresno County; Cynthia J. Zimmer, District
28 Attorney of Kern County; George Gascón, District Attorney of Los Angeles County; Lori E.

1 Frugoli, District Attorney of Marin County; Jeannine M. Pacioni, District Attorney of Monterey
2 County; Todd Spitzer, District Attorney of Orange County; Morgan Gire, District Attorney of
3 Placer County; Michael A. Hestrin, District Attorney of Riverside County; Thein Ho, District
4 Attorney of Sacramento County; Jason Anderson, District Attorney of San Bernardino County;
5 Summer Stephan, District Attorney of San Diego County; Brooke Jenkins, District Attorney of
6 San Francisco County; Dan Dow, District Attorney of San Luis Obispo County; Stephen M.
7 Wagstaffe, District Attorney of San Mateo County; John Savrnoch, District Attorney of Santa
8 Barbara County; Jeffrey F. Rosen, District Attorney of Santa Clara County; Krishna A. Abrams,
9 District Attorney of Solano County; Carla Rodriguez, District Attorney of Sonoma County; Jeff
10 Laugero, District Attorney of Stanislaus County; Timothy B. Ward, District Attorney of Tulare
11 County; and Erik Nasarenko, District Attorney of Ventura County (collectively "Prosecutors" or
12 "Prosecuting Agencies").

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

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

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

25 **DEFENDANT**

26 5. Defendant TESLA, INC., is now and was, at all times mentioned in this
27 Complaint, a Delaware corporation. Defendant currently conducts and has conducted business
28 on its own and/or through employees, agents, and affiliates in the State of California at facilities

1 owned and/or operated by Defendant. These facilities are collectively referred to herein as the
2 “Facilities,” and a list of the locations of the Facilities is attached as Exhibit A.

3 6. Defendant conducts different operations at different Facilities. These include
4 vehicle manufacture, battery production, and automotive repair.

5 7. Defendant is, and at all times relevant to the claims in this Complaint was,
6 legally responsible for compliance with the provisions of Chapter 6.5 of Division 20 of the
7 Health and Safety Code, and the implementing regulations of that chapter, in connection with
8 Defendant’s ownership and/or operation of the Facilities.

9 8. Defendant is a “person,” as defined in Business & Professions Code section
10 17201.

11 9. Defendant is a “business,” as defined in Civil Code section 1798.80, subdivision
12 (a).

13 10. When reference is made herein to any act or omission of Defendant, such
14 allegations shall include the acts and omissions of owners, officers, directors, agents,
15 employees, contractors, vendors, subsidiaries, affiliates, and/or representatives of Defendant
16 while acting in the course and scope of their employment or agency on behalf of the entity.

17 **JURISDICTION AND VENUE**

18 11. Venue is proper in San Joaquin County pursuant to Health and Safety Code
19 sections 25183, and Business and Professions Code sections 17200 et seq., in that certain of the
20 violations alleged in the Complaint occurred in San Joaquin County and throughout the State of
21 California.

22 12. This Court has jurisdiction pursuant to Article 6, section 10 of the California
23 Constitution and Code of Civil Procedure section 393.

24 13. Plaintiff and Defendant have entered into a series of agreements to toll any
25 applicable statute of limitations. Pursuant to the terms of those agreements, each day from
26 March 31, 2021 through August 31, 2023 (hereinafter, the “Tolling Period”) will not be
27 included in computing the time limited by any applicable statute of limitations. Additionally,
28 on April 6, 2020, the Judicial Council of California adopted Emergency Rule No. 9 in response

1 to the COVID-19 global health pandemic, which tolled statutes of limitations for civil causes of
2 action until 90 days after Governor Gavin Newsom lifted the current state of emergency. The
3 Judicial Council of California subsequently amended Emergency Rule 9, effective May 29,
4 2020, providing that: “Notwithstanding any other law, the statutes of limitations and repose for
5 civil causes of action that exceed 180 days are tolled from April 6, 2020, until October 1, 2020.”

6 **STATUTORY AND REGULATORY BACKGROUND**

7 14. The State of California has enacted a comprehensive statutory and regulatory
8 framework for the generation, handling, treatment, storage, transportation, and disposal of
9 hazardous wastes. This framework, contained in Chapter 6.5 of Division 20 of the Health and
10 Safety Code, section 25100, et seq., and its implementing regulations, which are found at Title
11 22 of the California Code of Regulations section 66260.1, et seq., mandates a “cradle to grave”
12 system known as the Hazardous Waste Control Law (HWCL). The HWCL system is
13 maintained to record the generation, registration, tracking, storage, treatment, and disposal of
14 hazardous wastes and to provide for the protection of the public and the environment from
15 present or potential risks posed by hazardous wastes. Companies that accumulate or generate
16 hazardous waste in the course of their operations and send such waste offsite for management,
17 treatment, storage, or disposal are subject to regulatory requirements. (See 22 CCR § 66262.10,
18 et seq.)

19 **ENFORCEMENT AUTHORITY**

20 15. Sections 25189 (c) and 25189 (d) of the Health and Safety Code impose civil
21 liability for any intentional or negligent disposal of hazardous waste at a point not authorized
22 according to the provisions of the HWCL. Section 25189.2(c) is an alternative strict liability
23 provision, which creates liability for any disposal of hazardous waste at a point not authorized
24 according to the provisions of the HWCL.

25 16. Section 25189 (b) of the Health and Safety Code imposes civil liability for any
26 intentional or negligent violation of the HWCL, or for any violation of any permit, rule,
27 regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section
28 25189.2(b) is an alternative strict liability provision, which creates liability for any violation of

1 the HWCL, or for any violation of any permit, rule, regulation, standard, or requirement issued
2 or promulgated pursuant to the HWCL.

3 17. Sections 17200 through 17208 of the Business and Professions Code (the “Unfair
4 Competition Law” or “UCL”) impose civil liability for any act of unfair competition, as defined
5 in California Business and Professions Code section 17200, to include any “unlawful [or]
6 unfair... business act or practice.”

7 18. The UCL, pursuant to Business and Professions Code sections 17203 and 17204,
8 authorizes the Court to issue an order to enjoin any person who engages, has engaged, or
9 proposes to engage in unfair competition as defined in California Business and Professions
10 Code section 17200. The UCL also provides, pursuant to Business and Professions Code
11 section 17205, that the remedies or penalties provided by the UCL are cumulative to each other
12 and to the remedies or penalties available under all other laws of this state.

13 19. Health and Safety Code sections 25181 and 25184 authorize the Court to issue an
14 order to enjoin any ongoing or potential violation of the HWCL, or of any applicable rule,
15 regulation, permit, standard, requirement, or order issued or promulgated pursuant to the
16 HWCL.

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

24 **GENERAL ALLEGATIONS**

25 21. At all times relevant to this Complaint, Defendant handled, transported, stored,
26 managed, used, and disposed of hazardous materials, and continues to do so at and/or from its
27 Facilities, in the ordinary course of operations, including those relating to the servicing of
28 electric vehicles and the development and manufacture of electric vehicles and electric vehicle

1 parts, including batteries. These hazardous materials include, but are not limited to: lubricating
2 oils, brake fluids, lead acid batteries, aerosols, antifreeze, cleaning fluids, propane, paint,
3 acetone, liquefied petroleum gas, adhesives, and diesel fuel.

4 22. At all times relevant to this Complaint, Defendant generated regulated quantities
5 of hazardous waste and continues to generate such waste at the Facilities, including but not
6 limited to: used lubricating oils, brake cleaners, used lead acid batteries and other batteries,
7 used aerosols, used antifreeze, waste solvents and other cleaners, electronic waste, waste paint,
8 and contaminated debris.

9 23. At all times relevant to this Complaint, at its Fremont Factory, located at 45500
10 Fremont Boulevard in Fremont, TESLA, INC., generated and continues to generate the
11 following hazardous wastes: weld spatter waste (which at times contains copper) produced in
12 the course of welding metal car panels; waste paint mix cups produced during paint repair
13 operations; and used wipes contaminated with primer coat generated by wiping the surfaces of
14 coated vehicles.

15 24. At all times relevant to this Complaint, Defendant generated hazardous waste
16 during every ninety (90) day period, and continues to do so, at each of the Facilities.

17 25. At all times relevant to this Complaint, Defendant owned, controlled, financed,
18 marketed, managed, directed, and was, and continues to be, responsible for the operations of the
19 Facilities, including the handling of hazardous materials and the management of hazardous
20 waste.

21 26. At all times relevant to this Complaint, Defendant is and was legally responsible
22 for all acts and omissions of its officers, directors, agents, employees, subsidiaries, contractors,
23 vendors, affiliates, and/or representatives relating to the handling of hazardous materials and the
24 management of hazardous waste at the Facilities, and failed to take appropriate steps to prevent
25 and/or correct the alleged violations despite having sufficient power and authority and with
26 notice of the alleged violations.

27 27. At all times relevant to this Complaint, Defendant was aware of, established,
28 implemented, managed, directed, approved, and ratified the business activities at each of the

1 Facilities, including the policies and procedures for the handling of hazardous materials and the
2 management of hazardous waste. Defendant's actions and/or omissions, as part of a continuing
3 course of conduct, are or were the legal cause of the violations alleged herein, and Defendant
4 reasonably could have acted to prevent violations and comply with applicable laws and
5 regulations.

6 28. At all times relevant to this Complaint, at some or all of the Facilities, Defendant
7 has violated provisions of the following statutes, including implementing regulations associated
8 with each of these statutes, and any related permit, rule, standard, or requirement issued or
9 promulgated pursuant to these statutes: Chapter 6.5 of the Health and Safety Code, section
10 25100 et seq.; and Business and Professions Code section 17200 et seq.

11
12 **SPECIFIC ACTS/OMISSIONS IN VIOLATION OF**
13 **CALIFORNIA ENVIRONMENTAL LAWS**

14 29. The People are informed and believe and based thereon allege that within the
15 time applicable to this action, Defendant has caused and/or performed each of the following acts
16 and/or omissions in violation of California law in the ownership and/or operation of some or all
17 of the Facilities:

18 a. Disposed, or caused the disposal, of hazardous waste at a point not authorized by
19 law, in violation of Health and Safety Code sections 25189 and 25189.2, including, but not
20 limited to, the disposal of hazardous waste into any trash container, dumpster, or compactor at
21 the Facilities, or caused the disposal of hazardous waste at a transfer station or landfill that is
22 not permitted to accept hazardous waste;

23 b. Transported, transferred custody of, or caused to be transported in California any
24 hazardous waste, as required by Health and Safety Code section 25163;

25 c. Failed to determine if a waste generated at the Facilities was a hazardous waste,
26 as required by California Code of Regulations, Title 22, sections 66262.11 and 66260.200(c);

27 d. Failed to properly mark, label, and store containers and tanks of hazardous waste
28 at the Facilities, as required under California Code of Regulations, Title 22, section 66262.34;

1 e. Failed to properly use and complete a uniform hazardous waste manifest prior to
2 transportation of hazardous waste from the Facilities, as required by Health and Safety Code
3 section 25160 and California Code of Regulations, Title 22, section 66262.42;

4 f. Failed to timely file with the Department of Toxic Substances Control (“DTSC”)
5 a hazardous waste manifest for all hazardous waste that was transported, or submitted for
6 transportation, for offsite handling, treatment, storage, disposal, or any combination thereof,
7 from any Facility, as required by Health and Safety Code section 25160(b)(3) and California
8 Code of Regulations, Title 22, section 66262.23;

9 g. Failed to segregate incompatible hazardous waste, as required by California
10 Code of Regulations, Title 22, section 66265.177;

11 h. Failed to properly manage universal waste, including but not limited to non-
12 empty aerosol cans within the meaning of Health and Safety Code section 25201.16, at the
13 Facilities, as required by California Code of Regulations, Title 22, section 66273.1 et seq.; and

14 i. Failed to comply with employee training and record-keeping requirements,
15 pertaining to the handling of hazardous waste, as required by California Code of Regulations,
16 Title 22, section 66265.16.

17
18 **FIRST CAUSE OF ACTION**

19 (Intentional Disposal of Hazardous Waste at an Unauthorized Point)
20 (Health & Safety Code § 25189, subd. (c))

21 30. Plaintiff realleges paragraphs 1 through 29, inclusive.

22 31. Health and Safety Code section 25189, subdivision (c), prohibits intentionally
23 disposing of, or causing the disposal of, hazardous waste at a point not authorized by the
24 provisions of Chapter 6.5 of Division 20 of the Health and Safety Code.

25 32. Defendant has intentionally disposed of, and intentionally caused the disposal of,
26 hazardous waste from the Facilities at an unauthorized point, in violation of California Health
27 and Safety Code section 25189, subdivision (c), and unless enjoined by order of the Court,
28 Defendant may or will continue in such unlawful acts and practices as alleged herein.

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1 33. Each intentional disposal of hazardous waste at an unauthorized point discovered
2 within five years of commencing this action, in addition to any applicable tolling periods and
3 those set forth in paragraph 13 herein, subjects Defendant to a separate and additional civil
4 penalty under Health and Safety Code section 25189, subdivision (c).

5 34. Each day on which the waste was knowingly allowed to remain at such
6 unauthorized point, without Defendant immediately filing a report of the deposit with DTSC
7 and complying with a cleanup order, subjects Defendant to a separate and additional civil
8 penalty under Health and Safety Code section 25189, subdivision (c).

9 35. Based on the above, the People request injunctive relief against Defendant under
10 Health and Safety Code sections 25181 and 25184, and civil penalties under Health and Safety
11 Code section 25189, subdivision (c), as described in the People's prayer for relief.

12 **SECOND CAUSE OF ACTION**
13 (Negligent Disposal of Hazardous Waste at an Unauthorized Point)
14 (Health and Safety Code, §25189, subd. (d))

14 36. Plaintiff realleges paragraphs 1 through 35, inclusive.

15 37. Health and Safety Code Section 25189, subdivision (d), prohibits the negligent
16 disposal of hazardous waste at a point not authorized by the provisions of Chapter 6.5 of
17 Division 20 of the Health and Safety Code.

18 38. Defendant has negligently disposed of, and negligently caused the disposal of,
19 hazardous waste from the Facilities at an unauthorized point, in violation of California Health
20 and Safety Code section 25189, subdivision (d), and unless enjoined by order of the Court,
21 Defendant may or will continue in such unlawful acts and practices as alleged herein.

22 39. Each negligent disposal of hazardous waste at an unauthorized point discovered
23 within five years of commencing this action, in addition to any applicable tolling periods and
24 those set forth in paragraph 13 herein, subjects Defendant to a separate and additional civil
25 penalty under Health and Safety Code section 25189, subdivision (d).

26 40. Each day on which the waste was knowingly allowed to remain at such
27 unauthorized point, without Defendant immediately filing a report of the deposit with DTSC

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1 and complying with a cleanup order, subjects Defendant to a separate and additional civil
2 penalty under Health and Safety Code section 25189, subdivision (d).

3 41. Based on the above, the People request injunctive relief against Defendant under
4 Health and Safety Code sections 25181 and 25184, and civil penalties under Health and Safety
5 Code section 25189, subdivision (d), as described in the People's prayer for relief.

6 **THIRD CAUSE OF ACTION**

7 (Strict Liability for Disposal of Hazardous Waste at an Unauthorized Point)
8 (Health & Safety Code, § 25189.2, subd. (c))

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

10 43. Health and Safety Code section 25189.2, subdivision (c), prohibits the disposal
11 of hazardous waste at an unauthorized point as a matter of strict liability.

12 44. Defendant has disposed of, and caused the disposal of, hazardous waste from the
13 Facilities at an unauthorized point, in violation of California Health and Safety Code section
14 25189.2, subdivision (c), and unless enjoined by order of the Court, Defendant may or will
15 continue in such unlawful acts and practices as alleged herein.

16 45. Each disposal of hazardous waste at an unauthorized point discovered within five
17 years of commencing this action, in addition to any applicable tolling periods and those set forth
18 in paragraph 13 herein, subjects Defendant to a separate and additional civil penalty under
19 Health and Safety Code section 25189.2, subdivision (c).

20 46. Each day on which the waste remained at such unauthorized point, without
21 Defendant immediately filing a report of the deposit with DTSC and complying with a cleanup
22 order, subjects Defendant to a separate and additional civil penalty under Health and Safety
23 Code section 25189.2, subdivision (c).

24 47. Based on the above, the People request injunctive relief against Defendant under
25 Health and Safety Code sections 25181 and 25184, and civil penalties under Health and Safety
26 Code section 25189.2, subdivision (c), as described in the People's prayer for relief.

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1 **FOURTH CAUSE OF ACTION**

2 (Intentional or Negligent Violation of Hazardous Waste Provision,
3 Permit, Rule, Regulation, Standard, or Requirement)
4 (Health & Safety Code, § 25189, subd. (b))

5 48. Plaintiff realleges paragraphs 1 through 47, inclusive.

6 49. Health and Safety Code section 25189, subdivision (b), prohibits the intentional
7 or negligent violation of any provision of the HWCL, or of any permit, rule, regulation,
8 standard, or requirement issued or promulgated pursuant to the HWCL.

9 50. Defendant has intentionally and negligently violated provisions, permit, rules,
10 regulations, standards, and requirements of the HWCL applicable to the Facilities by
11 committing the acts and omissions alleged above, and unless enjoined by order of the Court,
12 Defendant may or will continue in such unlawful acts and practices as alleged herein.

13 51. Each intentional or negligent violation of a provision, permit, rule, regulation,
14 standard, or requirement of the HWCL discovered within five years of commencing this action,
15 in addition to any applicable tolling periods and those set forth in paragraph 13 herein, subjects
16 Defendant to a separate and additional civil penalty under Health and Safety Code section
17 25189, subdivision (b).

18 52. Each day on which a violation continued subjects Defendant to a separate and
19 additional civil penalty under Health and Safety Code section 25189, subdivision (b).

20 53. Based on the above, the People request injunctive relief against Defendant under
21 Health and Safety Code sections 25181 and 25184, and civil penalties under Health and Safety
22 Code section 25189, subdivision (b), as described in the People's prayer for relief.

23 **FIFTH CAUSE OF ACTION**

24 (Strict Liability for Violation of Hazardous Waste Provision,
25 Permit, Rule, Regulation, Standard, or Requirement)
26 (Health & Safety Code, § 25189.2, subd. (b))

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

28 55. Health and Safety Code section 25189.2, subdivision (b), prohibits as a matter of
strict liability the violation of any provision of the HWCL, or of any permit, rule, regulation,
standard, or requirement issued or promulgated pursuant to the HWCL.

1 56. Defendant has violated provisions, permit, rules, regulations, standards, and
2 requirements of the HWCL applicable to the Facilities by committing the acts and omissions
3 alleged above, and unless enjoined by order of the Court, Defendant may or will continue in
4 such unlawful acts and practices as alleged herein.

5 57. Each violation of a provision, permit, rule, regulation, standard, or requirement
6 of the HWCL discovered within five years of commencing this action, in addition to any
7 applicable tolling periods and those set forth in paragraph 13 herein, subjects Defendant to a
8 separate and additional civil penalty under Health and Safety Code section 25189.2, subdivision
9 (b).

10 58. Each day on which a violation continued subjects Defendant to a separate and
11 additional civil penalty under Health and Safety Code section 25189.2, subdivision (b).

12 59. Based on the above, the People request injunctive relief against Defendant under
13 Health and Safety Code sections 25181 and 25184, and civil penalties under Health and Safety
14 Code section 25189.2, subdivision (b), as described in the People's prayer for relief.

15 **SIXTH CAUSE OF ACTION**

16 (Violations of Unfair Competition Law)
17 (Business & Professions Code sections 17200, et seq.)

18 60. Plaintiff realleges paragraphs 1 through 59, inclusive.

19 61. Within four years of commencing this action, exclusive of any applicable tolling
20 periods, including those set forth in paragraph 13 herein, Defendant has engaged in, and
21 continue to engage in, the unlawful acts and omissions and practices that constitute unfair
22 competition within the meaning of Business and Professions Code sections 17200 et seq.,
23 including but not limited to the acts and omissions and practices alleged in the First through
24 Fifth Causes of Action, above.

25 62. Each day that Defendant engaged in each separate unlawful act, omission, or
26 practice is a separate and distinct violation of Business and Professions Code section 17200.

27 63. Pursuant to Business and Professions Code section 17206, Defendant is liable for
28 civil penalties for each separate violation as alleged herein.

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1 64. Based on the above, Defendant must be immediately and permanently enjoined,
2 pursuant to Business and Professions Code section 17203, from engaging in acts or practices
3 that, as alleged in this Complaint, constitute a violation of Chapter 6.5 of Division 20 of the
4 Health and Safety Code or of its implementing regulations, which thereby constitutes unfair
5 competition within the meaning of Business and Professions Code section 17200.

6 **PRAYER FOR RELIEF**

7 Based on the above, the People request the following relief:

8 1. A Permanent Injunction requiring Defendant to comply with those provisions of
9 Health and Safety Code, Division 20, Chapter 6.5 and implementing regulations, which
10 Defendant is alleged to have violated;

11 2. A Permanent Injunction, issued pursuant to Business and Professions Code
12 section 17203, prohibiting Defendant from engaging in any act or practice that violates any
13 provision of Chapter 6.5 of Division 20 of the Health and Safety Code, or of Civil Code section
14 1798.80 et seq., as alleged in this Complaint, which thereby constitutes unfair competition
15 within the meaning of Business and Professions Code section 17200;

16 3. Civil penalties against Defendant, pursuant to Health and Safety Code section
17 25189, subdivision (c) or (d), or alternatively section 25189.2, subdivision (c), in an amount
18 according to proof;

19 4. Civil penalties against Defendant pursuant to Health and Safety Code section
20 25189, subdivision (b), or alternatively section 25189.2, subdivision (b), in an amount according
21 to proof;

22 5. Civil penalties against Defendant, pursuant to Health and Safety Code section
23 25189, subdivision (a), or alternatively section 25189.2, subdivision (a), in an amount according
24 to proof;

25 6. Civil penalties against Defendant, pursuant to Business and Professions Code
26 section 17206 for each act of unfair competition, in an amount according to proof;

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


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

RESPECTFULLY REQUESTED:

Dated: 1/30/2024

RONALD J. FREITAS
District Attorney of San Joaquin County

By 
Celeste Kaisch
Deputy District Attorney
*Attorneys for Plaintiff,
The People of the State of California*

1 *Attachment A - Additional Counsel for Plaintiff, the People of the State of California*

2 **PAMELA Y. PRICE**

3 **Alameda County District Attorney**

4 CARLOS J.E. GUZMAN, SBN 219185

5 Deputy District Attorney

6 7677 Oakport St., Ste. 650

7 Oakland, CA 94621

8 Telephone: (510) 383-8600

9 **MICHAEL L. RAMSEY**

10 **Butte County District Attorney**

11 Deputy District Attorney

12 Administration Building

13 25 County Center Drive, Suite 245

14 Oroville, CA 95965-3370

15 Telephone: (530) 538-7411

16 **DIANA BECTON**

17 **Contra Costa County District Attorney**

18 STACEY N. GRASSINI, SBN 154937

19 Deputy District Attorney

20 900 Ward Street

21 P.O. Box 670

22 Martinez, CA 94553-0150

23 Telephone: (925) 957-8604

24 **LISA A. SMITTCAMP**

25 **Fresno County District Attorney**

26 ADAM KOOK, SBN 285541

27 Deputy District Attorney

28 P.O. Box 389

 Fresno, CA 93708

 Telephone: (559) 600-3141

CYNTHIA J. ZIMMER

Kern County District Attorney

 GREGORY J. KOHLER, SBN 144063

 Deputy District Attorney

 1215 Truxtun Avenue

 Bakersfield, CA 93301

 Telephone: (661) 868-2340

1 **GEORGE GASCÓN**
2 **Los Angeles County District Attorney**
3 DANIEL J. WRIGHT, SBN 129309
4 Deputy District Attorney
5 211 West Temple Street, Suite 1000
6 Los Angeles, CA 90012
7 Telephone: (213) 257-2454

8 **LORI E. FRUGOLI**
9 **Marin County District Attorney**
10 ANDRES H. PEREZ, SBN 186219
11 Deputy District Attorney
12 3501 Civic Center Drive, Room 130
13 San Rafael, CA 94903
14 Telephone: (415) 499-6495

15 **JEANNINE M. PACIONI**
16 **Monterey County District Attorney**
17 Emily Hickok, SBN 247175
18 Deputy District Attorney
19 1200 Aguajito Road, Room 301
20 Monterey, CA 93940
21 Telephone: (831) 647-7770

22 **TODD SPITZER**
23 **Orange County District Attorney**
24 WILLIAM FALLON, SBN 190986
25 Deputy District Attorney
26 300 N. Flower Street
27 Santa Ana, CA 92703
28 Telephone: (714) 834-3600

MORGAN GIRE
Placer County District Attorney
BENJAMIN A. EGGERT, SBN 242183
Deputy District Attorney
10810 Justice Center Drive, Suite 240
Roseville, CA 95678
Telephone: (916) 543-8000

1 **MICHAEL A. HESTRIN**
2 **Riverside County District Attorney**
3 LAUREN R. MARTINEAU, SBN 250982
4 Deputy District Attorney
5 3960 Orange Street, First Floor
6 Riverside, CA 92501-3707
7 Telephone: (951) 955-5400

8 **THEIN HO**
9 **Sacramento County District Attorney**
10 DOUGLAS WHALEY, SBN 144557
11 Supervising Deputy District Attorney
12 906 G Street, Suite 700
13 Sacramento, CA 95814
14 Telephone: (916) 874-6174

15 **JASON ANDERSON**
16 **San Bernardino County District Attorney**
17 PAUL LEVERS, SBN 250110
18 Deputy District Attorney
19 303 W. 3rd Street, 5th Floor
20 San Bernardino, CA 92415
21 Telephone: (909) 891-3330

22 **SUMMER STEPHAN**
23 **San Diego County District Attorney**
24 MICHAEL McCANN, SBN 238794
25 Deputy District Attorney
26 330 West Broadway, Suite 750
27 San Diego, CA 92101
28 Telephone: (619) 531-4070

BROOKE JENKINS
San Francisco County District Attorney
KEVIN WONG, SBN 215446
Assistant District Attorney
732 Brannan Street, Second Floor
San Francisco, CA 94103
Telephone: (415) 551-9500

1 **DAN DOW**
2 **San Luis Obispo County District Attorney**
3 KENNETH J. JORGENSEN, SBN 220887
4 Deputy District Attorney
5 County Government Center, Room 450
6 San Luis Obispo, CA 93408
7 Telephone: (805) 781-5800

8 **STEPHEN M. WAGSTAFFE**
9 **San Mateo County District Attorney**
10 KENNETH A. MIFSUD, SBN 144000
11 Deputy District Attorney In-Charge
12 400 County Center, Third Floor
13 Redwood City, CA 94063
14 Telephone: (650) 363-4098

15 **JOHN SAVRNOCH**
16 **Santa Barbara County District Attorney**
17 CHRISTOPHER DALBEY, SBN 285562
18 Deputy District Attorney
19 1112 Santa Barbara Street
20 Santa Barbara, CA 93101
21 Telephone: (805) 568-2308

22 **JEFFREY F. ROSEN**
23 **Santa Clara County District Attorney**
24 BUD PORTER, SBN 197277
25 Supervising Deputy District Attorney
26 70 West Hedding Street, West Wing
27 San Jose, CA 95110
28 Telephone: (408) 792-2525

KRISHNA A. ABRAMS
Solano County District Attorney
DIANE NEWMAN, SBN 179926
Deputy District Attorney
675 Texas Street, Suite 4500
Fairfield, CA 94533-6340
Telephone: (707) 784-6800

1 **CARLA RODRIGUEZ**
2 **Sonoma County District Attorney**
3 CAROLINE L. FOWLER, SBN 110313
4 Deputy District Attorney
5 2300 County Center Drive, Suite B-170
6 Santa Rosa, CA 95403
7 Telephone: (707) 565-3161

8 **JEFF LAUGERO**
9 **Stanislaus County District Attorney**
10 AMY NEUMANN, SBN 182192
11 Deputy District Attorney
12 832 12th Street, Suite 300
13 Modesto, CA 95354
14 Telephone: (209) 525-5550

15 **TIMOTHY B. WARD**
16 **Tulare County District Attorney**
17 NADYA HANNAH, SBN 284897
18 Deputy District Attorney
19 221 S. Mooney Blvd., Room 224
20 Visalia, CA 93291
21 Telephone: (559) 636-5494

22 **ERIK NASARENKO**
23 **Ventura County District Attorney**
24 Karen L. Wold, SBN 132701
25 Senior Deputy District Attorney
26 5720 Ralston Street, Suite 300
27 Ventura, CA 93003
28 Telephone: (805) 662-1706

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EXHIBIT A

Exhibit A - Tesla Covered Facilities

	Primary Function Category	Address Location	City	County	ZIP	Closure Date
1	SSD	901 Gilman St	Berkeley	Alameda	94710	
2	SSD	6701 Amador Plaza Road	Dublin	Alameda	94568	
3	Manufacturing	45500 Fremont Blvd	Fremont	Alameda	94538	
4	SSD	48370 Kato Rd	Fremont	Alameda	94538	
5	SSD	3777 Spinnaker Ct	Fremont	Alameda	94538	
6	Energy	22290 Hathaway Ave	Hayward	Alameda	94541	
7	SSD	349 Huss Drive	Chico	Butte	95928	
8	Energy	187 Arthur Rd	Martinez	Contra Costa	94553	
9	Energy	651 N. Armstrong Ave, Suite 108	Fresno	Fresno	93727	
10	SSD	2988 N. Burl Ave.	Fresno	Fresno	93727	
11	SSD	5206 Young St	Bakersfield	Kern	93311	
12	SSD	28721 Canwood Street Bldg A	Agoura Hills	Los Angeles	91301	
13	SSD	1200 W Main St	Alhambra	Los Angeles	91801	
14	Energy	3022 Kenwood St	Burbank	Los Angeles	91505	
15	SSD	811 South San Fernando Boulevard	Burbank	Los Angeles	91502	
16	Energy	21040 Nordhoff Street	Chatsworth	Los Angeles	91311	
17	Energy	4884 W. 145th Street	Hawthorne	Los Angeles	90250	
18	SSD	1800 E Spring St	Long Beach	Los Angeles	90755	
19	SSD	5840 W Centinela Avenue	Los Angeles	Los Angeles	90045	
20	SSD	11163 Santa Monica Boulevard	Los Angeles	Los Angeles	90025	
21	SSD	1100 Colorado Ave	Santa Monica	Los Angeles	90401	
22	SSD	14006 Riverside Dr. Space 78	Sherman Oaks	Los Angeles	91423	
23	SSD	2560 W. 237th St	Torrance	Los Angeles	90505	
24	SSD	3525 W Carson St. Space 419	Torrance	Los Angeles	90503	
25	SSD	6919-6921 Hayvenhurst Ave	Van Nuys	Los Angeles	91406	
26	SSD	6929 Hayvenhurst Ave	Van Nuys	Los Angeles	91406	
27	SSD	3880 Valley Blvd	Walnut	Los Angeles	91789	
28	SSD	1932 E Garvey Ave S	West Covina	Los Angeles	91791	
29	SSD	201 Casa Buena Dr	Corte Madera	Marin	94925	
30	SSD	454 Du Bois Street #460	San Rafael	Marin	94901	
31	SSD	1901 Del Monte Boulevard	Seaside	Monterey	93955	
32	SSD	41 COLUMBIA	Aliso Viejo	Orange	92656	
33	SSD	6692 Auto Center Drive	Buena Park	Orange	90621	
34	SSD	3020 Pullman Street	Costa Mesa	Orange	92626	
35	Energy	2102 Alton Pkwy	Irvine	Orange	92606	
36	SSD	2801 Barranca Pkwy	Irvine	Orange	92606	
37	SSD	25471 Arctic Ocean Dr	Lake Forest	Orange	92630	
38	SSD	26361 Via De Anza	San Juan Capistrano	Orange	92675	
39	SSD	3240 South Standard Ave	Santa Ana	Orange	92705	
40	SSD	1104 Tinker Rd	Rocklin	Placer	95765	
41	SSD	4361 Granite Dr	Rocklin	Placer	95677	
42	SSD	68080 Perez Road	Cathedral City	Riverside	92234	
43	Energy	1755 Iowa Avenue, Building B	Riverside	Riverside	92507	
44	SSD	7920 Lindbergh Drive	Riverside	Riverside	92508	
45	SSD	43191 Rancho Way	Temecula	Riverside	92590	
46	Energy	2709 Academy Way, Ste. 300	Sacramento	Sacramento	95815	
47	SSD	2535 Arden Way	Sacramento	Sacramento	95825	
48	SSD	8470 Belvedere Ave Suite B	Sacramento	Sacramento	95826	
49	Energy	19640 Cajon Blvd	San Bernardino	San Bernardino	92407	
50	SSD	1018 E 20th St	Upland	San Bernardino	91784	
51	Energy	18499 Phantom West, Suite 8	Victorville	San Bernardino	92394	
52	SSD	3248 Lionshead Avenue	Carlsbad	San Diego	92010	
53	Energy	8225 Mercury Court	San Diego	San Diego	92111	
54	SSD	5600 Kearny Mesa Road	San Diego	San Diego	92111	
55	SSD	9250 Trade Place	San Diego	San Diego	92126	
56	Energy	2370 Oak Ridge Way, Suite A	Vista	San Diego	92081	

Exhibit A - Tesla Covered Facilities

	Primary Function Category	Address Location	City	County	ZIP	Closure Date
57	SSD	999 Van Ness Avenue	San Francisco	San Francisco	94109	
58	SSD	500 East Louise Avenue	Lathrop	San Joaquin	95330	
59	Energy	2001 Arch Airport Road	Stockton	San Joaquin	95215	
60	SSD	3131 Auto Center Circle	Stockton	San Joaquin	95212	
61	SSD	50 Edwards Ct	Burlingame	San Mateo	94010	
62	SSD	1500 Collins Ave	Colma	San Mateo	94014	
63	Energy	391 Foster City Boulevard	Foster City	San Mateo	94404	
64	SSD	400 Hitchcock Way	Santa Barbara	Santa Barbara	93105	
65	Energy	1235 W McCoy Ln, Suite C	Santa Maria	Santa Barbara	93455	
66	SSD	500 Automall Dr	Gilroy	Santa Clara	95020	
67	SSD	4180 El Camino Real	Palo Alto	Santa Clara	94306	
68	SSD	1460 Mabury Road	San Jose	Santa Clara	95133	
69	SSD	2801 Northwestern Parkway	Santa Clara	Santa Clara	95051	
70	SSD	750 El Camino Real	Sunnyvale	Santa Clara	94087	
71	SSD	680 E El Camino Real	Sunnyvale	Santa Clara	94087	
72	SSD	1001 Admiral Callaghan Ln	Vallejo	Solano	94591	
73	Energy	1362 N. McDowell Blvd.	Petaluma	Sonoma	94954	
74	SSD	3286 Airway Drive	Santa Rosa	Sonoma	95403	
75	Energy	8900 W. Hurley Drive. Suite 105	Visalia	Tulare	93291	
76	SSD	311 E Daily Drive	Camarillo	Ventura	93010	
77	SSD	6701 Amador Plaza Road	Dublin	Alameda	94568	8/14/2020
78	Energy	41490 Boyce Rd	Fremont	Alameda	94538	7/31/2019
79	Energy	2354 Davis Ave Bldg 14	Hayward	Alameda	94545	8/5/2021
80	Energy	20939 Cabot Blvd.	Hayward	Alameda	94545	7/20/2021
81	Energy	1216 Stealth Street	Livermore	Alameda	94551	12/31/2023
82	Energy	5206 Young Street, Suite A	Bakersfield	Kern	93311	2/28/2019
83	Energy	14967 Salt Lake City Avenue	Industry	Los Angeles	91746	5/31/2020
84	Energy	5375 W San Fernando Road	Los Angeles	Los Angeles	90039	7/31/2021
85	SSD	3880 Valley Blvd	Pomona	Los Angeles	91789	5/31/2023
86	SSD	1616 Redwood Highway	Corte Madera	Marin	94925	1/31/2023
87	Energy	128 Carlos Drive, Suite H	San Rafael	Marin	94903	3/31/2020
88	Energy	24 and 26 Mark Drive	San Rafael	Marin	94903	9/30/2019
89	Energy	131/125/88 Mitchell	San Rafael	Marin	94903	8/31/2019
90	Energy	1520 Moffett Street	Salinas	Monterey	93905	3/31/2021
91	SSD	3140 Pullman St	Costa Mesa	Orange	92626	11/30/2021
92	Energy	43320 Business Park Drive, Suites B103-104	Temecula	Riverside	92590	12/15/2019
93	Energy	4621 E. Guasti Rd	Ontario	San Bernardino	91761	3/31/2021
94	SSD	10851 Edison Ct.	Rancho Cucamonga	San Bernardino	91730	11/11/2022
95	SSD	4665 North Avenue	Oceanside	San Diego	92056	10/31/2019
96	SSD	7007 Friars Road	San Diego	San Diego	92108	1/26/2022
97	SSD	5600 Kearny Mesa Rd	San Diego	San Diego	92111	9/30/2018
98	Energy	1237 Archer Street	San Luis Obispo	San Luis Obispo	93401	8/31/2019
99	Energy	2059 Monte Vista Avenue, Ste. C	Vacaville	Solano	95688	2/28/2021
100	Energy	821 Oates Court	Modesto	Stanislaus	95358	3/31/2020
101	SSD	3421 Galaxy Place	Oxnard	Ventura	93030	12/14/2021