

1 NANCY E. O'MALLEY  
DISTRICT ATTORNEY OF THE COUNTY OF ALAMEDA  
2 ALYCE SANDBACH, STATE BAR NO. 141894  
DEPUTY DISTRICT ATTORNEY  
3 CONSUMER AND ENVIRONMENTAL PROTECTION UNIT  
7677 OAKPORT STREET, SUITE 650  
4 Oakland, California 94621  
Telephone: (510) 383-8600  
5 Facsimile: (510) 383-8615  
Additional Plaintiff's counsel listed in Appendix hereto

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

*Exempt from Fees*  
*Government Code section 6103*

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of Alameda  
**12/02/2022 at 01:04:49 PM**  
By: Angela Linhares,  
Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF ALAMEDA

11 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

12 Plaintiff,

13 v.

14 FAIZAN CORPORATION, a California  
Corporation and MAHMOOD ALAM,

15 Defendants.

Case No. **22CV023017**

**COMPLAINT FOR PERMANENT  
INUNCTION, CIVIL PENALTIES, AND  
OTHER RELIEF**

(Health & Safety Code, Div. 20, Chapters 6.5  
6.67, 6.7 and 6.95; Bus. & Prof. Code § 17200  
*et. seq.*)

19  
20 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA, brings this law  
21 enforcement action to protect public health and the environment from harm due to releases of  
22 hazardous substances, including harm from groundwater and surface water contamination and  
23 indoor air impacts from leaking Underground Storage Tanks (UST's), and from other violations,  
24 including unfair and unlawful business practices, and alleges the following based on information  
25 and belief.  
26  
27  
28

1 **PLAINTIFF**

2 1. Plaintiff, the PEOPLE OF THE STATE OF CALIFORNIA, (the "People"), brings this  
3 action by and through Nancy E. O'Malley, District Attorney of Alameda County; Diana Becton,  
4 District Attorney of Contra Costa County; Susan J. Krones, District Attorney of Lake County; Lori  
5 E. Frugoli, District Attorney of Marin County; C. David Eyster, District Attorney of Mendocino  
6 County; Jill R. Ravitch, District Attorney of Sonoma County; and Jeff Reisig, District Attorney of  
7 Yolo County.

8 2. Pursuant to California Health and Safety Code sections 25299.01 and 25299.02, the  
9 People may bring a civil action for civil penalties and an injunction based on violations of the State's  
10 statutory scheme entitled "Underground Storage of Hazardous Substances," relating to underground  
11 storage tanks (UST's) containing fuel, which is set forth in Chapter 6.7 of Division 20 of the California  
12 Health and Safety Code (hereinafter "Chapter 6.7"), and which pursuant to which implementing  
13 regulations have been issued, which are set forth in California Code of Regulations, Title 23, Division  
14 3, Chapter 16.

15 3. Pursuant to California Health and Safety Code sections 25181 and 25182, the People may  
16 bring a civil action for civil penalties and an injunction based on violation of the State's statutory  
17 scheme entitled "Hazardous Waste Control Act," which is set forth in Chapter 6.5 of Division 20 of  
18 the California Health and Safety Code (hereinafter "Chapter 6.5"), and pursuant to which  
19 implementing regulations have been issued, which are set forth in California Code of Regulations,  
20 Title 23, Division 4.5.

21 4. Pursuant to California Health and Safety Code sections 25515.6, 25515.7, and  
22 25515.8, the People may bring a civil action for penalties and an injunction based on violations of the  
23 State's statutory scheme entitled, "Hazardous Materials Release Response Plans and Inventory,"  
24 which is set forth at Chapter 6.95 of Division 20 of the California Health and Safety Code (hereinafter  
25 "Chapter 6.95") and pursuant to which implementing regulations have been issued, which are set forth  
26 in California Code of Regulations, Title 19, Division 2, Chapter 4.  
27  
28







1  
2 **JURISDICTION AND VENUE**

3 15. Defendants, at all times mentioned herein, have transacted business within, *inter alia*,  
4 one or more of the following Counties: Alameda, Contra Costa, Lake, Marin, Mendocino, Sonoma,  
5 and Yolo, and all or some of the violations of law hereinafter described have been committed within  
6 said counties.  
7

8 16. This court has jurisdiction pursuant to Article 6, section 10 of the California  
9 Constitution, Health and Safety Code sections 25181, 25182, 25270.12, Health and Safety Code  
10 section 25299.01, 25299.02, 25515.6 and 25515.7.

11 17. Venue is proper in Alameda County pursuant to Health and Safety Code sections  
12 25183 and 25299.03 and California Code of Civil Procedure section 393, subdivision (a) because a  
13 cause of action or some part of a cause of action arose in Alameda County.  
14

15 **GENERAL ALLEGATIONS**

16 18. At all relevant times alleged herein, including during the commission of the violations  
17 set forth below, Defendants owned, operated, managed, and/or controlled retail motor vehicle fuel  
18 facilities in all or some of the following counties: Alameda, Contra Costa, Lake, Marin, Mendocino,  
19 Sonoma, and Yolo, including at the following locations:

- 20 a) 712 Lewelling Boulevard in San Leandro;  
21 b) 2799 Clayton Road in Concord;  
22 c) 5200 Main Street in Kelseyville;  
23 d) 170 Merrydale Road in San Rafael;  
24 e) 998 South State Street in Ukiah;  
25 f) 390 East Gobbi Street in Ukiah;  
26 g) 615 Talmage Road in Ukiah;  
27  
28

- 1 h) 1460 North Lovers Lane in Ukiah;  
2 i) 1004 South Main Street in Fort Bragg;  
3 j) 2225 Cleveland Ave. in Santa Rosa;  
4 k) 29029 County Road 6 in Dunnigan; and  
5 l) 1785 South Main Street in Lakeport.  
6

7  
8 **FIRST CAUSE OF ACTION**  
9 **Violation of Underground Storage of Hazardous Substances Law**  
10 **(Health and Safety Code, Division 20, Chapter 6.7, Section 25281 *et seq.*)**

11 19. The People reallege and incorporate by reference all paragraphs above.

12 20. At all times mentioned herein, Defendants were owners and/or operators of  
13 underground storage tanks (UST's) at the retail fuel facilities set forth above, and as such, are strictly  
14 liable for civil penalties and injunctive relief for violation of any requirement set forth in Health and  
15 Safety Code Chapter 6.7 and of any regulation issued pursuant thereto, pursuant to Health and Safety  
16 Code sections 25299(a)(6) and (b)(4).

17 21. Defendants committed the following violations of Health and Safety Code Chapter  
18 6.7, and its implementing regulations set forth in title 23 of the California Code of Regulations:

- 19 a. Failure to install, maintain, operate, and calibrate all UST monitoring equipment such  
20 that the equipment was capable of detecting a release at the earliest possible  
21 opportunity as required by California Code of Regulations, title 23, sections 2630 and  
22 2641.  
23  
24 b. Failure to annually certify all monitoring equipment for operability, proper operating  
25 condition, and proper calibration and failure to submit a copy of a Monitoring System  
26 Certification Form within 30 days after completion of the test as required by California  
27 Code of Regulations, title 23, sections 2638(c) and 2638(d).  
28

- 1 c. Failure to operate and maintain primary containment equipment in a product-tight  
2 condition as required by Health and Safety Code sections 25290.1(c) and 25290.2 (c),  
3 and California Code of Regulations, title 23, sections 2631 and 2632.
- 4 d. Failure to maintain leak detection equipment with audible and visual alarms as  
5 required by California Code of Regulations, title 23, sections 2632(c)(2)(B),  
6 2634(d)(1)(a) and 2636(f)(1).
- 7 e. Failure to maintain functioning line leak detectors monitoring pressurized piping with  
8 the capability of detecting a release of three (3) gallons per hour at ten (10) pounds per  
9 square inch and restrict or shut off the flow of product through the piping when a leak  
10 is detected as required by California Code of Regulations, title 23, section 2636(f)(2).
- 11 f. Failure to ensure that boots in turbine sumps, transition sumps and piping sumps were  
12 properly placed so that piping drained to a monitored sump as required by California  
13 Code of Regulations, title 23, sections 2630(d) , 2636(c) and 2641(a).
- 14 g. Failure to conduct initial and periodic Enhanced Leak Detection testing for UST  
15 systems located within one thousand (1,000) feet of a public drinking water well in  
16 violation of Health and Safety Code sections 25292.4 and 25292.5 and California Code  
17 of Regulations, title 23, sections 2640(e) and 2644.1.
- 18 h. Failure to conduct secondary containment testing and to submit a secondary  
19 containment test report to the local agency as required by California Code of  
20 Regulations, title 23, section 2637.
- 21 i. Failure to construct, operate, and maintain secondary containment such that it was  
22 product-tight as required by Health and Safety Code section 25290.1.
- 23  
24  
25  
26  
27  
28

- 1 j. Failure to install and maintain spill containers in good condition, product-tight, and  
2 with a minimum capacity of five (5) gallons as required by California Code of  
3 Regulations, title 23, sections 2635(b), 2637(b), 2637.1(a), 2637.1(c) and 2665.  
4  
5 k. Failure to conduct spill container tightness testing upon completion of an installation  
6 and every twelve (12) months thereafter in violation of California Code of Regulations,  
7 title 23, section 2637.1.  
8  
9 l. Failure to submit a copy of the spill container testing results to the relevant local  
10 agency within thirty (30) days of testing as required by California Code of Regulations,  
11 title 23, section 2637.1.  
12  
13 m. Failure to timely inspect the UST overfill prevention equipment and to submit to the  
14 relevant local agency proof of inspection of the UST system overfill prevention  
15 equipment as required by California Code of Regulations, title 23, section 2637.2.  
16  
17 n. Failure to assure that Designated UST Operator visual inspections were conducted  
18 every thirty (30) days and that such monthly inspections were recorded in an inspection  
19 report that was maintained on site in accordance with section 2715 as required by  
20 California Code of Regulations, title 23, section 2715 and 2716).  
21  
22 o. Failure to have at least one (1) facility employee present during operating hours that  
23 has been trained in the proper operation and maintenance of the UST system by a  
24 Designated UST Operator in violation of California Code of Regulations, title 23,  
25 section 2715(c).  
26  
27 p. Failure to maintain a list of employees trained by the Designated UST Operator as  
28 required by California Code of Regulations, title 23, section 2715(c)(3).  
q. Failure to maintain a permit for a UST as required by Health and Safety Code section  
sections 25284(a)(1) and 25299(a)(1) and (b)(1).

- 1 r. Failure to submit to the local agency all information required as part of the application  
2 for permit to operate a UST permit as required by California Code of Regulations, title  
3 23, section 2711, and Health and Safety Code sections 25284, 25286 and 25299(a).
- 4 s. Retained individuals to perform work relating to a UST system when such individuals  
5 did not possess the proper qualifications to perform such work as required by  
6 California Code of Regulations, title 23, sections 2715 and 2637.
- 7  
8 t. Failure to submit a current UST Response Plan as required by and in violation of  
9 California Code of Regulations, title 23, sections 2712(i), 2632(d)(2), 2634(e),  
10 2641(h).
- 11 u. Failure to submit the “Designated Underground Storage Tank Operator Identification  
12 Form” within thirty (30) days of a change in Designated Operator in violation of  
13 California Code of Regulations, title 23, section 2715(a)(1)(B).
- 14  
15 v. Failure to retain and maintain records of UST monitoring, testing, repairs as required  
16 by California Code of Regulations, title 23, section 2712 and Health and Safety Code  
17 section 25293.
- 18 w. Failure to maintain records of cathodic protection system testing conducted within six  
19 months of installation and at least every three (3) years thereafter in violation of  
20 California Code of Regulations, title 23, sections 2635 and 2712(b).
- 21  
22 x. Failure to submit to the local agency proof of compliance with state and federal  
23 financial responsibility requirements applicable to USTs containing petroleum in  
24 violation of Health and Safety Code section 25292.2(a) and 25299.31 and California  
25 Code of Regulations, title 23, section 2711(a)(11).
- 26 y. Failure to submit to submit a complete and accurate plot plan as required by California  
27 Code of Regulations, title 23, sections 2632(d)(1)(c), 2641(h) and 2711(a)(8).
- 28

- 1 z. Failure to install, retrofit and maintain under dispenser secondary containment as  
2 required by Health and Safety Code sections 25290.1(c), 25290.2(c), 25291(a)(2),  
3 25192(b)(5)-(e)(1) and (2).  
4  
5 aa. Abandonment of the UST system and failure to properly close the UST system as  
6 required by Health and Safety Code sections 25298, 25299 and California Code of  
7 Regulations, title 23, sections 2670, and 2672.  
8  
9 bb. Failure to pay the annual UST program fee as required by Health and Safety Code  
10 section 25287 (a) and (b).  
11

12 **SECOND CAUSE OF ACTION**  
13 **Violation of the Aboveground Storage of Petroleum Act**  
**(Health and Safety Code, Division 20, Chapter 6.67, Section 25270 et seq.)**

14 22. The People reallege and incorporate by reference all paragraphs above.

15 23. At all times mentioned herein, Defendants were owners and/or operators of an  
16 Aboveground Petroleum Storage Tank (“APST”) facility as defined in Health and Safety Code  
17 sections 25170.2(a) and 25170.2(n), located at 1785 South Main Street, Lakeport, California.  
18 At all times relevant herein, the APST’s at this facility had a storage capacity of more than  
19 1,320 gallons.  
20

21 24. Defendants committed the following violations in the course of their operation of  
22 APST systems at their Lakeport facility:

23 a. Failure to prepare and submit a spill prevention control and countermeasure  
24 plan (SPCC plan) as required by Health and Safety Code section 25270.4.5(a) and Section 112.1 of  
25 Subchapter D of Chapter I of Title 40 of the Code of Federal Regulations.  
26

27 b. Storage of oil in an aboveground storage tank when the tank materials,  
28 conditions, and pressures were not compatible with the holding and storage of oil and were prohibited

1 for such use in violation of Title 40 of the Code of Federal Regulations section 112.8(c)(1) and Health  
2 and Safety Code section 25270.4.5(a).

3 c. Failure to file a "tank facility statement" as required by Health and Safety Code  
4 section 25270.6(a)(1).

5 d. Failure to pay to the relevant local agency permit fees as required by Health  
6 and Safety Code section 25270.6(b).

8 **THIRD CAUSE OF ACTION**

9 **Intentional or Negligent Violations of the Hazardous Waste Control Law**  
10 **(Health and Safety Code, Division 20, Chapter 6.5, section 25100 et seq.)**

11 25. The People reallege and incorporate by reference all paragraphs above.

12 26. Defendants, as owners and operators of the facilities described below, committed the  
13 following violations of the above-referenced Hazardous Waste Control Act statutes and  
14 regulations:

- 15 a. Failure to send hazardous waste offsite for treatment, storage, or disposal within one  
16 hundred and eighty (180) days after collection of such hazardous waste had been  
17 initially placed in a container in violation of California Code of Regulations, title 22,  
18 section 66262.34 and Health and Safety Code section 25189.
- 19 b. Storage of hazardous waste without affixing and clearly marking labels thereon with  
20 the words "Hazardous Waste" and writing on the label in a clearly legible manner the  
21 name and address of the generator, physical and chemical characteristics of the  
22 Hazardous Waste, and the accumulation start date as required by and in violation of  
23 California Code of Regulations, title 22, section 66262.34(f).
- 24 c. Failure to obtain an EPA Identification Number prior to treating, storing, disposing of,  
25 transporting, or offering for transportation a hazardous waste in violation of California  
26 Code of Regulations title 22, section 66262.12.



- 1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23
- d. Failure to provide employees with hazardous waste training within the first six (6) months after the date of their employment in violation of California Code of Regulations, title 22, sections 66262.34(a)(4) and 66265.16.
  - e. Failure to keep and maintain training records for current and former personnel at the facility for at least three (3) years from the date such employees last worked at the facility as required by California Code of Regulations, title 22 sections 66262.34(a)(4) and 66265.16.
  - f. Illegal disposal of hazardous waste in violation of Health and Safety Code section 25189 and 25189.2.
  - g. Failure to inspect hazardous waste storage areas at least weekly to look for leaking and deteriorating containers and failure to maintain a copy of an inspection log demonstrating that the hazardous waste storage area is inspected weekly as required by California Code of Regulations, title 22, section 66262.34(d)(2).
  - h. Failure to maintain and operate a facility to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water in violation of California Code of Regulations, title 22, section 66264.31.
  - i. Failure to keep a copy of each hazardous waste manifest for at least three (3) years from the date the waste was accepted by the initial transporter as required by California Code of Regulations, title 22, section 66262.40(a).
  - j. Failure to properly handle and store hazardous waste in violation of California Code of Regulations, title 22, sections 66262.34(d)(2), 40 CFR 1 262.34(d)(2), and 265.173.

24  
25

**FOURTH CAUSE OF ACTION**

**Violation of the Hazardous Materials Release Response Plan and Inventory Law  
(Health and Safety Code, Division 20, Chapter 6.95, section 25500 *et seq.*)**

26  
27  
28

27. The People reallege and incorporate by reference all paragraphs above.

1 28. Defendants, the owners and/or operators of the facilities described below, knowingly  
2 and after reasonable notice committed the following violations of Health and Safety Code,  
3 Chapter 6.95 and the regulations issued pursuant thereto:  
4

5 a. Failure to establish, submit to the local agency, and implement a business plan while storing  
6 a hazardous material as required by Health and Safety Code section 25505; HSC 6.95  
7 25508(a)(1), 25508(d).  
8

9 b. Failure to submit a hazardous material inventory for all reportable hazardous materials on site  
10 at or above reportable quantities in violation of Health and Safety Code sections 25505(a)(1),  
11 25506, 25508(a)(1).  
12

13 c. Failure to annually review and certify that the information in the business plan for the facility  
14 was complete, accurate, and up to date as required Health and Safety Code section 25508.2.  
15

16 d. Failure to have a business plan readily available to personnel of the business or the local  
17 agency as required by Health and Safety Code section 25505(c).  
18

19 e. Failure to provide initial and annual training to all employees in safety procedures in the event  
20 of a release or threatened release of hazardous materials and failure to document and maintain  
21 training records for a minimum of three (3) years as required by Health and Safety Code  
22 Section 25505(a)(4).  
23

24 **FIFTH CAUSE OF ACTION**  
25 **Violation of the Unfair Competition Law**  
26 **(Business and Professions Code section 17200 et. seq.)**

27 29. The People reallege and incorporate the above paragraphs.

28 30. Defendants engaged in unlawful acts, omissions, and practices that constitute unfair  
competition and unlawful business practices within the meaning of Business and Professions  
Code sections 17200 et seq, to wit, all violations of law alleged in the First through Fourth  
Causes of Action above, and the following additional violations of law:

1 a. Failure to label motor vehicle fuel dispensers with the octane rating of the  
2 products dispensed in violation of Business and Professions Code section 13480(a).

3 b. Failure to label all dispensers with the name of the station in violation of  
4 Business and Professions Code section 13480(a).

5 c. Failure to label all dispensers with the grade of the fuel product being sold in  
6 violation of Business and Professions Code section 13480(a).

7 d. Failure to label the premium fill pipe with the grade of motor vehicle fuel in  
8 violation of Business and Professions Code section 13480(a).

9 e. Failure to label all dispensers with brand labels in violation of Business and  
10 Professions Code section 13480(a).

11 f. Failure to properly label the diesel grade in violation of Business and  
12 Professions Code section 13480(a).

13  
14 g. Failure to label dispensers with the type of product dispensed, to wit: gasoline  
15 or Diesel, in violation of Business and Professions Code section 13480(a).

16 h. Failure to label the underground storage tanks as required in violation of  
17 Business and Professions Code section 13480(a).

18  
19 i. Installation of vehicle fuel dispensers without notice to the county sealer in  
20 violation of Business and professions Code section 1215(a).

21 j. False promotion and advertisement of the sale of diesel fuel when the  
22 corporation was not selling diesel fuel in violation of Business and Professions Code section 17500  
23 *et seq.*

24 k. Failure to exhibit a tax chart on site listing taxes per gallon of motor vehicle  
25 fuel in violation of Business and Professions Code section 13361.

26 l. Removal of official Yolo County Department of Weights and Measures seals  
27 from gasoline dispensers installed at the Dunnigan location and, after replacing the gasoline  
28 dispensers at the Dunnigan facility, placement of the Department of Weights and Measures seals on

1 the newly installed gasoline dispensers without notifying the Department in violation of Business  
2 and Professions Code section 13413.

3 m. Sale of 89 Octane motor vehicle fuel while falsely representing that the  
4 gasoline was 91 Octane, in violation of Business and Professions Code section 13486(a).

5 n. False advertisement of 89.8 octane gasoline as 91 octane gasoline in violation  
6 of Business and Professions Code section 17500.

7  
8 o. Failure to post the price clearly and legibly per gallon of motor vehicle fuel on  
9 the fuel dispenser in violation of Business and Professions Code section 13474.

10 p. Failure to post the price clearly and legibly per gallon of motor vehicle fuel on  
11 the fuel dispenser in violation of Business and Professions Code section 13474.

12 q. Failure to properly label the premium fuel fill pipe as required by and in  
13 violation of Business and Professions Code section 13483.

14  
15 **WHEREFORE, PLAINTIFF PRAYS FOR THE FOLLOWING RELIEF:**

16 1. Injunctive relief, including but not limited to, a permanent injunction requiring  
17 Defendants, and each of them, to comply with the requirements of California Health and Safety Code,  
18 Division 20, Chapter 6.7 and all implementing regulations;

19  
20 2. Injunctive relief, including but not limited to, a permanent injunction requiring  
21 Defendants, and each of them to comply with the requirements of California Health and Safety Code,  
22 Division 20, Chapter 6.67 and all implementing regulations;

23 3. Injunctive relief, including but not limited to, a permanent injunction requiring  
24 Defendants, and each of them, to comply with the requirements of California Health and Safety Code,  
25 Division 20, Chapter 6.5 and all implementing regulations;

1           4.       Injunctive relief, including but not limited to, a permanent injunction requiring  
2 Defendants, and each of them, to comply with the requirements of California Health and Safety Code,  
3 Division 20, Chapter 6.95 and all implementing regulations;

4           5.       Injunctive relief, including but not limited to, a permanent injunction requiring  
5 Defendants, and each of them, to comply with the requirements of California Business and  
6 Professions Code Division 5, Chapter 14;

7           6.       For civil penalties, according to proof;

8           7.       For costs to Plaintiff of investigation and enforcement herein; and

9           8.       That Plaintiff be given such other and further relief as the nature of this case may  
10 require and this Court deems equitable, just, and proper.  
11

12  
13  
14  
15 Dated: Nov. 7, 2022

NANCY E. O'MALLEY  
District Attorney, Alameda County

16  
17  
18 By: 

Alyce Sandbach  
Deputy District Attorney  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**APPENDIX**

NANCY E. O'MALLEY District Attorney, County of Alameda Alyce Sandbach, SBN 141894 Deputy District Attorney 7677 Oakport Street, Suite 650 Oakland, CA 94621 (510) 383-8600	DIANA BECTON District Attorney, County of Contra Costa Stacey Grassini, SBN 154937 Senior Deputy District Attorney 900 Ward Street Martinez, CA 94553 (925) 957-2200
SUSAN J. KRONES District Attorney, Lake County 255 North Forbes Street Lakeport CA 95453 (707) 263-2251	LORI FRUGOLI District Attorney, County of Marin Andres H. Perez, SBN 186219 Deputy District Attorney 3501 Civic Center Dr., Rm. 145 San Rafael, CA 94903 (415) 4736450
C. DAVID EYSTER District Attorney, County of Mendocino 100 N State St, Room G-10 Ukiah, CA 95482 (951) 955-5400	JILL R. RAVITCH District Attorney, County of Sonoma Caroline Fowler, SBN 110313 Deputy District Attorney 2300 County Center Dr., Ste. B170 Santa Rosa, CA 95403 (707) 565-3161
JEFF W. REISIG District Attorney, County of Yolo David J. Irej, SBN 142864 Assistant Chief Deputy District Attorney 301 Second Street Woodland, CA 95695 (916) 666-8180	