1 2 3 4 5	JEFF W. REISIG District Attorney of Yolo County DAVID J. IREY, SBN 142864 Assistant Chief Deputy District Attorney 301 Second Street Woodland, CA 95695 Telephone: (530) 666-8428 Email: david.irey@yolocounty.org	FILED YOLO SUPERIOR COURT  APR 1 5 2019  By J. HARRIS  Deputy
6	Attorneys for People of the State of California	
7	Plaintiff's Counsel Continued on Attachment A	
8	SUPERIOR COURT OF	
9	COUNTY OF Y	4
10	THE PEOPLE OF THE STATE OF CALIFORNIA,	Case No. CV cv 19-75
11	Plaintiff,	, COMPLAINT FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, AND
12	v.	OTHER RELIEF
13		) ) ) (II 141 0 G C G 1 00 05100 )
14 15	PARTY CITY CORPORATION, a Delaware Corporation,	(Health & Saf. Code, §§ 25100 et seq., 25500 et seq.; Bus. & Prof. Code, § 17200 et seq.)
}	Defendant.	) )
16		) Exempt from fees per Gov. Code, § 6103 )
17		
18		
19	Digintiff THE DEODI E OF THE STATE OF C	ALIEODNIA II. (1 CII. I I
20	Plaintiff, THE PEOPLE OF THE STATE OF C	ALIFORNIA, allege the following based on
21	information and belief:	
22	PLAINTIF	
23		ugh Jeff W. Reisig, District Attorney of Yolo
24	County; Nancy E. O'Malley, District Attorney of Alam	eda County; Michael L. Ramsey, District
25	Attorney of Butte County; Diana Becton, District Attorn	ney of Contra Costa County; Katherine
26	Micks, District Attorney of Del Norte County; Maggie	Fleming, District Attorney of Humboldt
27	County; Gilbert G. Otero, District Attorney of Imperial	County; Keith L. Fagundes, District Attorney
28	of Kings County; S. Melyssah Rios, District Attorney o	f Lassen County; Jackie Lacey, District

Attorney of Los Angeles County; Michael N. Feuer, City Attorney of Los Angeles; Lori Frugoli,
District Attorney of Marin County; C. David Eyster, District Attorney of Mendocino County;
Kimberly Helms Lewis, District Attorney of Merced County; Jeannine M. Pacioni, District Attorney
of Monterey County; Allison Haley, District Attorney of Napa County; Todd Spitzer, District
Attorney of Orange County; R. Scott Owens, District Attorney of Placer County; Michael A. Hestrin
District Attorney of Riverside County; Anne Marie Schubert, District Attorney of Sacramento
County; Jason Anderson, District Attorney of San Bernardino County; Mara W. Elliott, City
Attorney of San Diego; Summer Stephan, District Attorney of San Diego County; George Gascón,
District Attorney of San Francisco County; Tori Verber Salazar, District Attorney of San Joaquin
County; Dan Dow, District Attorney of San Luis Obispo County; Stephen M. Wagstaffe, District
Attorney of San Mateo County; Joyce E. Dudley, District Attorney of Santa Barbara County; Jeffrey
F. Rosen, District Attorney of Santa Clara County; Stephanie A. Bridgett, District Attorney of Shasta
County; Krishna A. Abrams, District Attorney of Solano County; Jill R. Ravitch, District Attorney of
Sonoma County; Birgit A. Fladager, District Attorney of Stanislaus County; Amanda L. Hopper,
District Attorney of Sutter County; Laura L. Krieg, District Attorney of Tuolumne County; and
Gregory D. Totten, District Attorney of Ventura County; (collectively, "the People").

- 2. The People bring this action to, among things, enjoin Defendant from violating Chapters 6.5 and 6.95 of Division 20 of the Health and Safety Code, and to impose civil penalties against Defendant.
- 3. The People may bring a civil action to enjoin any violation of Chapter 6.5 of Division 20 of the Health and Safety Code ("Chapter 6.5"), and may seek civil penalties for any violation of Chapter 6.5. (Health & Saf. Code, § 25182; see also Health & Saf. Code, §§ 25181, 25189, 25189.2.)
- 4. The People may bring a civil action to enjoin any violation of Health and Safety Code sections 25504 to 25508.2, inclusive, and Section 25511 (collectively, "Chapter 6.95"), and may seek civil penalties for any violation of Chapter 6.95. (Health & Saf. Code, § 25515.7; see also Health & Saf. Code, §§ 25515, 25515.6.)
  - 5. The People may bring a civil action to enjoin any person who engages, has engaged,

or proposes to engage in unfair competition, as defined in Business and Professions Code section 17200, and may seek civil penalties for each act of unfair competition. (Bus. & Prof. Code, §§ 17203, 17204, 17206.)

6. The People bring this action without prejudice to any other action or claim that the People may have based on separate, independent, and unrelated violations arising out of matters or allegations that are not set forth in this Complaint.

#### **DEFENDANT**

- 7. Defendant PARTY CITY CORPORATION, is now, and at all times mentioned in this Complaint was, a Delaware corporation.
- 8. At all times relevant, Defendant PARTY CITY CORPORATION, owned, operated, licensed, or leased, in its own capacity or through affiliates, retail stores known as "Party City" in Yolo County and other locations throughout California. These stores are/were permanent retail locations that operated on a year-round basis. The stores are collectively referred to as the "Party City Facilities." A list of the locations of the Party City Facilities is attached as Exhibit A-1.
- 9. At all times relevant, Defendant PARTY CITY CORPORATION, owned, operated, licensed, or leased, in its own capacity or through affiliates, retail stores known as "Halloween City" and/or "Toy City" in Yolo County and other locations throughout California. These stores are/were temporary retail stores that operated on a seasonal basis at locations subject to change year to year. These stores are collectively referred to as the "Halloween City Facilities." A list of known locations of Halloween City Facilities is included in Exhibit A-2.
- 10. At all times relevant, Defendant stocked, stored, and offered for sale hazardous materials at and from these Party City Facilities and Halloween City Facilities. These hazardous materials include, but are not limited to, batteries, electronic devices, ignitable liquids, aerosol products, cleaning agents, and other flammable, reactive, toxic, and corrosive materials. Defendant also generated regulated quantities of hazardous waste at each of the Party City Facilities and Halloween City Facilities as a result of its business practices.
  - 11. At all times relevant, Defendant was legally responsible for compliance with the

provisions of the Health and Safety Code, including Chapters 6.5 and 6.95, at the Party City Facilities and Halloween City Facilities; Defendant controlled and was responsible for the operations of the Party City Facilities and Halloween City Facilities, and aided, abetted, and acted in concert with persons who exercised control over those operations, including, but not limited to, all acts and omissions relating to the management of hazardous materials and hazardous waste at the Party City Facilities and Halloween City Facilities; and Defendant failed to take appropriate steps to prevent and correct the violations alleged in this Complaint, despite having the power, authority, and notice sufficient to do so.

- 12. Defendant is a "person," as defined in Health and Safety Code section 25118 and Business and Professions Code section 17201, and a "business," as defined in Health and Safety Code section 25501(c).
- 13. Allegations in this Complaint of Defendant's acts or omissions include the acts and omissions of Defendant's owners, officers, directors, agents, employees, affiliates, and representatives.

#### JURISDICTION AND VENUE

- 14. Venue is proper in this county pursuant to Code of Civil Procedure section 393 and Health and Safety Code sections 25183 and 25515.6 in that certain of the violations alleged in the Complaint occurred in the County of Yolo and throughout the State of California.
- 15. This Court has jurisdiction pursuant to article 6, section 10, of the California Constitution.
- 16. The People and Defendant have entered into a series of agreements to toll any applicable statutes of limitation. As a result of those agreements, the period between August 14, 2015 to January 15, 2019, inclusive, will not be included in computing the time limited by any statutes of limitation applicable to the causes of action brought against Defendant based on claims covered by the tolling agreements. Those claims include the claims alleged in this action against Defendant.

## STATUTORY AND REGULATORY BACKGROUND

17. The State of California has enacted a comprehensive statutory and regulatory

framework for the generation, handling, treatment, storage, transportation, and disposal of hazardous wastes. This framework—contained in Chapter 6.5 of Division 20 of the Health and Safety Code, section 25100 et seq., and its implementing regulations, which are found at title 22 of the California Code of Regulations section 66260.1 et seq.—mandates a "cradle to grave" system known as the Hazardous Waste Control Law ("HWCL"). The HWCL system is maintained to record the generation, registration, tracking, storage, treatment, and disposal of hazardous wastes, and to provide for the protection of the public and the environment from present and potential risks posed by hazardous wastes.

18. The State of California has also enacted a comprehensive statutory and regulatory framework for the notification, handling, training, and spill/release reporting of hazardous materials. This framework is contained in Chapter 6.95 of Division 20 of the Health and Safety Code, section 25500 et seq., and its implementing regulations, and is known as the Hazardous Materials Release Response Plans and Inventory Law. To better inform the public and to assist emergency responders, Chapter 6.95 has, for over thirty (30) years, mandated that basic information on the location, type, quantity, and the health risks of hazardous materials handled, used, stored, or disposed of in the state, which could be accidentally released into the environment, be made available to firefighters, health officials, planners, public safety officers, health care providers, regulatory agencies, and other interested persons.

#### **ENFORCEMENT AUTHORITY**

- 19. Business and Professions Code section 17206 imposes civil liability for any act of unfair competition, as defined in Business and Professions Code section 17200.
- 20. Section 25189 of the Health and Safety Code imposes civil liability for any negligent or intentional violation of the HWCL and for any violation of any permit, rule, regulation, standard, or requirement issued or promulgated pursuant to the HWCL. Section 25189.2 of the Health and Safety Code is an alternative strict-liability provision that creates liability for any violation of the HWCL and for any violation of any permit, rule, regulation, standard, or requirement issued or promulgated pursuant to the HWCL.
  - 21. Section 25515, subdivision (b), of the Health and Safety Code imposes civil liability

for any knowing violation of Sections 25504 to 25508.2, inclusive, and Section 25511, of the Health and Safety Code. Section 25515, subdivision (a), of the Health and Safety Code is an alternative strict-liability provision that imposes civil liability for any violation of Sections 25504 to 25508.2, inclusive, and Section 25511, of the Health and Safety Code.

- 22. Business and Professions Code section 17203 authorizes the Court to issue an order that enjoins any person who engages, has engaged, or proposes to engage in unfair competition, as defined in Business and Professions Code section 17200.
- 23. Health and Safety Code section 25181 authorizes the Court to issue an order that enjoins any ongoing or potential violation of the HWCL or of any applicable rule, regulation, permit, standard, requirement, or order issued or promulgated pursuant to the HWCL.
- 24. Health and Safety Code section 25515.6 authorizes the Court to issue an order that enjoins any ongoing or potential violation of Chapter 6.95.
- 25. Health and Safety Code sections 25184 and 25515.8 provide that in civil actions brought pursuant to the HWCL or Chapter 6.95, respectively, in which an injunction or temporary restraining order is sought, it shall not be necessary for the People to allege or prove at any stage of the proceeding that irreparable damage will occur should the temporary restraining order, preliminary injunction, or permanent injunction not be issued, or that the remedy at law is inadequate, and the temporary restraining order, preliminary injunction, or permanent injunction shall issue without such allegations and without such proof.

#### **GENERAL ALLEGATIONS**

- 26. Unless specifically stated otherwise, allegations in this Complaint are based on facts that were discovered within five years of the tolled statute of limitations period, as set out in paragraph 16, and continued thereafter.
- 27. Defendant owned, operated, licensed, or leased, and continue to own, operate, license, or lease, Party City Facilities throughout California, and is responsible for acts and omissions committed at these Facilities. Defendant further has owned, operated, licensed, or leased Halloween City Facilities, and will continue to own, operate, license, or lease, current and future Halloween City Facilities throughout California, and is responsible for acts and omissions committed at these

Facilities.

- 28. Defendant handled at the Party City Facilities and Halloween City Facilities significant quantities of hazardous materials, including, but not limited to, batteries, electronic devices, ignitable liquids, aerosol products, cleaning agents, and other flammable, reactive, toxic, and corrosive materials. Many of those hazardous materials are offered for sale to the public in the ordinary course of business.
- 29. Defendant also generated regulated quantities of hazardous waste at each of the Party City Facilities and Halloween City Facilities because of, among other things, damage to containers, spills and releases of hazardous materials, unsellable hazardous products, and customer returns of hazardous products—all of which must be handled and disposed of as hazardous waste in compliance with the HWCL.
- 30. Defendant, at each of its Party City Facilities and Halloween City Facilities, generated hazardous waste during every ninety (90) day period.
- 31. Defendant is and was responsible for the operation of each of its Party City Facilities and Halloween City Facilities. Defendant is and was aware of and conducted, approved, and controlled the hazardous-materials and hazardous-waste management activities at its Party City Facilities and Halloween City Facilities. Defendant's actions and omissions, as part of a continuing course of conduct, are or were the legal cause of the violations alleged in this Complaint, and Defendant reasonably could have taken action to prevent them.
- 32. Defendant has violated provisions of the following statutes and regulations at the Facilities within the time period applicable to this action: Chapter 6.5 of the Health and Safety Code (section 25100 et seq.), Chapter 6.95 of the Health and Safety Code (section 25500 et seq.); Business and Professions Code section 17200 et seq., and regulations, permits, rules, standards, and requirements associated with these statutes.
- 33. Defendant caused or performed each of the acts and/or omissions alleged below in violation of California law in the ownership and/or operation of some or all of its Party City Facilities and Halloween City Facilities:
  - a. Disposed, or caused the disposal, of hazardous waste at a point not authorized by

law, in violation of Health and Safety Code sections 25189 and 25189.2, including, without limitation, to any trash, dumpster, drain, sink, or toilet at any of the Facilities, and onto the surface or subsurface of the ground at any unauthorized location, or at a landfill or transfer station not authorized to receive hazardous waste;

- b. Transported, or caused to be transported, any hazardous waste to an unauthorized location in California, in violation of Health and Safety Code section 25189.5;
- c. Transported, transferred custody of, or caused to be transported in California hazardous waste using a transporter that was not registered to transport hazardous waste, in violation of Health and Safety Code section 25163;
- d. Failed to determine if a generated waste—including, but not limited to, items returned by customers to its Party City Facilities and Halloween City Facilities and wastes generated at those same facilities—were hazardous wastes, in violation of California Code of Regulations, title 22, sections 66262.11 and 66260.200(c);
- e. Failed to properly manage, identify the date of accumulation, and label containers of hazardous waste at its Party City Facilities and Halloween City Facilities, in violation of California Code of Regulations, title 22, section 66262.34;
- f. Failed to lawfully and timely dispose of all accumulated hazardous waste at its

  Party City Facilities and Halloween City Facilities, in violation of California Code

  of Regulations, title 22, section 66262.34;
- g. Unlawfully stored, handled, and accumulated hazardous waste, in violation of Health and Safety Code section 25123.3 and California Code of Regulations, title 22, sections 66262.34 and 66265.173;
- Failed to conduct inspections of hazardous waste storage areas at its Party City
   Facilities and Halloween City Facilities, in violation of California Code of

   Regulations, title 22, sections 66262.34 and 66265.174;
- Failed to timely cause to be prepared and filed with the Department of Toxic
   Substance Control ("DTSC") a hazardous waste manifest for all hazardous waste

that is transported, or submitted for transportation, for offsite handling, treatment,
storage, disposal, or any combination thereof, from any Party City Facility and
Halloween City Facility in violation of Health and Safety Code section
25160(b)(3) and California Code of Regulations, title 22, section 66262.23;

- j. Failed to contact the owner or operator of a designated facility that was to receive hazardous waste from Defendant to determine the status of the hazardous waste, in the event Defendant had not received a copy of the manifest signed by all transporters and the facility operator within thirty-five (35) days of the date the waste was accepted by the initial transporter, in violation of Health and Safety Code section 25160(b)(3) and California Code of Regulations, title 22, section 66262.42;
- k. Failed to timely notify the DTSC by filing an exception report concerning the treatment, storage, or disposal facility's failure to return any executed manifest, in violation of Health and Safety Code section 25160(b)(3) and California Code of Regulations, title 22, section 66262.42;
- 1. Failed to prepare and maintain copies of hazardous-waste manifests for three (3) years, in violation of California Code of Regulations, title 22, section 66262.40.
- m. Failed to segregate incompatible hazardous-waste items, in violation of California Code of Regulations, title 22, section 66265.177;
- n. Failed to comply with employee training obligations pertaining to the handling of hazardous waste at its Party City Facilities and Halloween City Facilities, in violation of California Code of Regulations, title 22, section 66262.34(d) and 40 C.F.R. section 262.16(b)(9)(iii);
- o. Failed to properly manage, mark, and store universal waste at each Facility in violation of the standards for universal waste management found in California Code of Regulations, title 22, sections 66273.33 through 66273.36; or in the alternative, failed to manage such waste as hazardous waste in violation of Chapter 6.5 and its implementing regulations in California Code of Regulations,

- title 22, including, but not limited to, section 66262.34;
- p. Failed to keep a record of each shipment of universal waste sent from each Facility, in violation of California Code of Regulations, title 22, section 66273.39; or in the alternative, failed to manage such waste as hazardous waste in violation of Chapter 6.5 and its implementing regulations in California Code of Regulations, title 22, including, but not limited to, section 66262.34;
- q. Failed to treat returned or discarded non-empty aerosol cans at its Party City Facilities and Halloween City Facilities as universal waste or hazardous waste, in violation of California Code of Regulations, title 22, section 66273.1 et seq.;
- r. Failed to establish, implement, or submit to the responsible "Certified Unified Program Agency" (as defined in Health and Safety Code sections 25123.7(b) and 25404(a)), a hazardous materials business plan for each of the Facilities, in violation of Health and Safety Code sections 25505, 25507, and 25508, and California Code of Regulations, title 19, section 2650;
- s. Failed to implement, maintain, and comply with an employee-training program on hazardous materials meeting the requirements of Health and Safety Code section 25505(a)(4), and California Code of Regulations, title 19, section 2659; and
- t. Failed to immediately report any release or threatened release of a reportable quantity of any hazardous material from any Party City Facility and/or Halloween City Facility into the environment, in violation of Health and Safety Code section 25510.
- Failed to take all reasonable steps to dispose, or arrange for the disposal, of customer records within its custody or control containing personal information, in violation of Civil Code 1798.81.
- 34. Defendant's noncompliance with the above statutes and regulations threatened, and continues to threaten, public health, public safety, and the environment. The People's stated claims against Defendant in this Complaint do not include claims for performance of cleanup, corrective action, or response action for any actual past or future releases, spills, or disposals of hazardous

waste or hazardous substances that were caused or contributed to by Defendants at or from the Facilities.

#### FIRST CAUSE OF ACTION

# (Disposal of Hazardous Waste at a Point Not Authorized)

(Health & Saf. Code, §§ 25189, 25189.2)

- 35. The People reallege paragraphs 1 through 34, inclusive.
- 36. Health and Safety Code sections 25189 and 25189.2 prohibit the disposal, or causing of the disposal, of hazardous waste at a point not authorized under Chapter 6.5. Section 25189, subdivisions (c) and (d), respectively, prohibits the intentional and negligent disposal of hazardous waste at an unauthorized point, and section 25189.2, subdivision (c), prohibits the disposal of hazardous waste at an unauthorized point as a matter of strict liability.
- 37. Defendant violated Chapter 6.5 by, among other things, disposing and causing the disposal of hazardous waste at and from its Party City Facilities and Halloween City Facilities to unauthorized points, in violation of Health and Safety Code sections 25189 and 25189.2; and unless enjoined by order of the Court, Defendants may or will continue committing these acts.
- 38. Each disposal of hazardous waste at an unauthorized point discovered within five years of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 16 above, 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 Defendant to a separate and additional civil penalty under Health and Safety Code section 25189, or alternatively, under section 25189.2.
- 39. Based on the above, the People request injunctive relief against Defendant under Health and Safety Code section 25181, and civil penalties under Health and Safety Code sections 25189 or 25189.2, as described in the People's prayer for relief.

#### SECOND CAUSE OF ACTION

(Unauthorized Transportation of Hazardous Waste)

(Health & Saf. Code, §§ 25163, 25189, 25189.2; Cal. Code Regs., tit. 22, § 66263.23)

40. The People reallege paragraphs 1 through 39, inclusive.

- 41. Health and Safety Code section 25163 prohibits the transportation of hazardous waste without a valid registration from the DTSC. California Code of Regulations, title 22, section 66263.23(b) prohibits the transportation of hazardous waste to a location not permitted or otherwise authorized by the DTSC to receive the waste.
- 42. Defendant engaged in the transportation of hazardous waste from its Party City Facilities and Halloween City Facilities to unauthorized locations without a valid registration from the DTSC, in violation of Health and Safety code section 25163 and California Code of Regulations, title 22, section 66263.23; and unless enjoined by order of the Court, Defendant may or will continue committing these acts.
- 43. Each act of unauthorized transportation of hazardous waste without a valid registration discovered within five years of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 16 above, subjects Defendant to a separate and additional civil penalty under Health and Safety Code section 25189, or alternatively, under section 25189.2.
- 44. Based on the above, the People request injunctive relief against Defendant under Health and Safety Code section 25181, and civil penalties under Health and Safety Code section 25189 or 25189.2, as described in the People's prayer for relief.

#### THIRD CAUSE OF ACTION

(Violation of Hazardous Waste Handling and Storage Requirements)

(Health & Saf. Code Chapter 6.5 (§ 25100 et seq.); Cal. Code Regs., tit. 22, § 66260.1 et seq.)

- 45. The People reallege paragraphs 1 through 44, inclusive.
- 46. Health and Safety Code sections 25189 and 25189.2 prohibit improper hazardous waste handling and storage in violation of Chapter 6.5.
- 47. Defendant violated the requirements of Chapter 6.5 and its implementing regulations at California Code of Regulations, title 22, section 66260.1 et seq., applicable to its Party City Facilities and Halloween City Facilities, by committing the acts and omissions alleged in paragraph 33; and unless enjoined by order of the Court, Defendant may or will continue committing these acts and omissions.

- 48. Each violation of the requirements of Chapter 6.5 and its implementing regulations at California Code of Regulations, title 22, section 66260.1 et seq., discovered within five years of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 16 above, subjects Defendant to a separate and additional civil penalty under Health and Safety Code section 25189, or alternatively, under section 25189.2.
- 49. Based on the above, the People request injunctive relief against Defendant under Health and Safety Code section 25181, and civil penalties under Health and Safety Code section 25189 or 25189.2, as described in the People's prayer for relief.

#### FOURTH CAUSE OF ACTION

(Violations of Hazardous Materials Release Response Plans and Inventory Laws)

(Health & Saf. Code Chapter 6.95 (§ 25500 et seq.); Cal. Code Regs., tit. 19, § 2650 et seq.)

- 50. The People reallege paragraphs 1 through 49, inclusive.
- 51. Chapter 6.95 of Division 20 of the Health and Safety Code (section 25500 et seq.) require businesses to, among other things, provide training to employees, retain training records, and maintain applicable permits and hazardous materials response plans and inventories.
- 52. Defendant failed to comply with Chapter 6.95 and its implementing regulations at California Code of Regulations, title 19, section 2650 by, among other things, failing to maintain the required hazardous materials response plans and inventories, training records, and applicable permits required for its Party City Facilities and Halloween City Facilities; and unless enjoined by order of the Court, Defendant may or will continue in the course of conduct as alleged in this Complaint.
- 53. Each violation of Health and Safety Code sections 25504 to 25508.2, inclusive, and section 25511, and any applicable permit, rule, regulation, standard, or requirement issued or promulgated pursuant to those sections, discovered within five years of commencing this action, exclusive of any applicable tolling periods and those set forth in paragraph 16 above, subjects Defendant to a separate and additional civil penalty under Health and Safety Code section 25515(b), or alternatively, under section 25515(a).
- 54. Based on the above, the People request injunctive relief against Defendant under Health and Safety Code section 25515.6, and civil penalties under Health and Safety Code section

25515, as described in the People's prayer for relief.

#### FIFTH CAUSE OF ACTION

### (Violations of Unfair Competition Law)

(Bus. & Prof. Code, § 17200 et seq.)

- 55. The People reallege paragraphs 1 through 54, inclusive...
- 56. Within four (4) years of the date of commencement of this action, exclusive of any applicable tolling periods and those set forth in paragraph 16 above, Defendant engaged in, and continues to engage in, unlawful acts, omissions, and practices that constitute unfair competition within the meaning of Business and Professions Code sections 17200 through 17208, as alleged in paragraph 33 and in the First through Fourth Causes of Action; and unless enjoined by order of the Court, Defendant may or will continue in the course of conduct as alleged in this Complaint.
- 57. Each and every separate act constitutes an unlawful and/or unfair business practice. Each day that Defendant engaged in each separate unlawful act, omission, or practice is a separate and distinct violation of Business and Professions Code section 17200 et seq.
- 58. Based on the above, the People request injunctive relief against Defendant under Business and Professions Code section 17203, and civil penalties under Business and Professions Code section 17206, as described in the People's prayer for relief.

#### PRAYER

WHEREFORE, the People respectfully request that the Court grant the following relief:

- 1. Permanently enjoin Defendant from violating those provisions of Chapter 6.5 of Division 20 of the Health and Safety Code and its implementing regulations, which Defendant are alleged to have violated;
- 2. Permanently enjoin Defendant from violating those provisions of Chapter 6.95 of Division 20 of the Health and Safety Code and its implementing regulations, which Defendant are alleged to have violated;
- 3. Permanently enjoin Defendant from engaging in unfair competition as defined in Business and Professions Code section 17200, including those acts alleged in this Complaint;
  - 4. Assess a civil penalty against Defendant for each violation of Health and Safety Code

1	section 2518	9, or alternatively, section 25189.2, in an amount according to proof;	
2	5.	Assess a civil penalty against Defendant for each violation of Health and Safety Coo	le
3	section 2551	5(b), or alternatively, section 25515(a), in an amount according to proof;	
4	6.	Assess a civil penalty against Defendant under Business and Professions Code secti	on
5	17206 for ea	ch act of unfair competition, in an amount according to proof;	
6	7.	Award the People their costs of suit, including costs of investigation; and	
7	8.	Grant such other relief as the Court deems just and equitable.	
8	-		
9	Datade Ami	Description 11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	
10	Dated: Apri	Respectfully submitted,	
11		JEFF W. REISIG, District Attorney County of Yolo, State of California	
12	e la	County of Tolo, State of Camornia	
13			
14		By: DAVID LIREY	
15		Assistant Chief Deputy District Attorney Attorneys for Plaintiff	
16		The People of the State of California	
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

- 11		
1	GILBERT G. ORTERO	
2	Imperial County District Attorney ROBERT E. NICHOLS, SBN 100028	
3	County Administration Building 940 West Main Street, Suite 102	
4	El Centro, CA 92243 Telephone: (442) 265-1175	
5		
6	KEITH L. FAGUNDES Kings County District Attorney	
7	ROBERT E. NICHOLS, SBN 100028 1400 West Lacey Blvd.	
8	Hanford, CA 93230 Telephone: (559) 582-0326	
9	S. MELYSSAH RIOS	
10	Lassen County District Attorney	
11	ROBERT E. NICHOLS, SBN 100028 Deputy District Attorney	
12	2950 Riverside Dr. Ste 102 Susanville, CA 96130	
13	Telephone: (530) 251-8283	
14	JACKIE LACEY Los Angeles County District Attorney	
16	DANIEL J. WRIGHT, SBN 129309 Deputy District Attorney	
17	211 West Temple Street, Suite 1000	
18	Los Angeles, CA 90012 Telephone: (213) 257-2454	
19	MICHAEL N. FEUER	
20	City Attorney of Los Angeles JESSICA B. BROWN, SBN 211642	
21	Supervising Deputy City Attorney JACLYN A. BLANKENSHIP, SBN 267524	
22	Deputy City Attorney 200 N. Main Street, 8th Floor, City Hall East	
23	Los Angeles, CA 90012 Telephone: (213) 978-8040	
24		
25	LORI FRUGOLI Marin County District Attorney	
26	ANDRES H. PEREZ, SBN 186219 Deputy District Attorney	
27	3501 Civic Center Drive, Room 130 San Rafael, CA 94903	
28	Telephone: (415) 473-6495	

- 1		
1	C. DAVID EYSTER	
2	Mendocino County District Attorney ROBERT E. NICHOLS, SBN 100028	
3	Deputy District Attorney Courthouse	
4	100 North State Street, Room G-10	
5	(PO BOX 1000) Ukiah, CA 95482	
6	Telephone: (707) 463-4211	
7	KIMBERLY HELMS LEWIS	
8	Merced County District Attorney ROBERT E. NICHOLS, SBN 100028	
9	550 West Main Street   Merced, CA 95340	
10	Telephone: (209) 385-7381	
11	JEANNINE M. PACIONI	
12	Monterey County District Attorney ANNE M. MICHAELS, SBN 136134	
13	Assistant District Attorney 1200 Aguajito Road, Room 301	
14	Monterey, CA 93940 Telephone: (831) 647-7770	
15		
16	ALLISON HALEY   Napa County District Attorney	
17	PATRICK D. COLLINS, SBN 253872 Deputy District Attorney	•
18	1127 First Street, Suite C	
19	Napa, CA 94559 Telephone: (707) 253-4211	
20	TODD SPITZER	
21	Orange County District Attorney WILLIAM G. FALLON, SBN 190986	
22	Deputy District Attorney 401 Civic Center Drive West	
23	Santa Ana, CA 92701	
24	Telephone: (714) 834-3600	
25	R. SCOTT OWENS Placer County District Attorney	
26	JANE CRUE, SBN 210122	
27	Deputy District Attorney 10810 Justice Center Drive, Suite 240	
28	Roseville, CA 95678 Telephone: (916) 543-8000	

- 1		
1	MICHAEL A. HESTRIN	
2	Riverside County District Attorney LAUREN R. MARTINEAU SBN 250982	
3	Deputy District Attorney	
4	3960 Orange Street, First Floor Riverside, CA 92501-3707	
	Telephone: (951) 955-5400	
5	ANNE MARIE SCHUBERT	
6	Sacramento County District Attorney	
7	DOUGLAS WHALEY, SBN 144557 Supervising Deputy District Attorney	
8	906 G Street, Suite 700 Sacramento, CA 95814	
9	Telephone: (916) 874-6174	
10	JASON ANDERSON	
11	San Bernardino County	
12	DOUGLAS POSTON, SBN 176388 Supervising Deputy District Attorney	
13	303 West Third Street, 5th Floor San Bernardino, CA 92415	
14	Telephone: (909) 382-7748	
15	MARA W. ELLIOTT	
16	City Attorney of San Diego MICHAEL R. HUDSON, SBN 121877	
17	Deputy City Attorney	
18	1200 Third Avenue, Suite 1620 San Diego, CA 92101	
19	Telephone: (619) 236-6220	
	SUMMER STEPHAN	
20	San Diego County District Attorney ELIZABETH MCCLUTCHEY, SBN 163301	
21	Deputy District Attorney 330 West Broadway, Suite 750	
22	San Diego, CA 92101	
23	Telephone: (619) 531-4070	
24	GEORGE GASCÓN	
25	San Francisco County District Attorney GREGORY ALKER, SBN 204838	
26	Assistant District Attorney	
27	732 Brannan Street, Second Floor San Francisco, CA 94103	
28	Telephone: (415) 551-9500	
_0		

1	TORI VERBER SALAZAR
2	San Joaquin County District Attorney
	CELESTE KAISCH, SBN 234174
3	Deputy District Attorney 222 E. Weber Ave., Room 202
4	Stockton, CA 95202
	Telephone: (209) 468-2400
5	DANDOW
6	DAN DOW San Luis Obispo County District Attorney
	ERIC J. DOBŘOTH, SBN 197676
7	Assistant District Attorney 1035 Palm St, 4 <sup>th</sup> Floor
8	San Luis Obispo, CA 93408
9	Telephone: (805) 781-5800
	STEPHEN M. WAGSTAFFE
10	San Mateo County District Attorney
11	JOHN E. WILSON, SBN 95602
10	Deputy District Attorney in Charge
12	400 County Center, Third Floor Redwood City, CA 94063
13	Telephone: (650) 363-4636
14	
	JOYCE E. DUDLEY
15	Santa Barbara County District Attorney CHRISTOPHER DALBEY, SBN 285562
16	Deputy District Attorney
	1112 Santa Barbara Street
17	Santa Barbara, CA 93101
18	Telephone: (805) 568-2308
19	JEFFREY F. ROSEN
19	Santa Clara County District Attorney
20	BUD PORTER, SBN 197277
21	Supervising Deputy District Attorney
	70 West Hedding Street, West Wing San Jose, CA 95110
22	Telephone: (408) 792-2525
23	
24	STEPHANIE A. BRIDGETT
24	Shasta County District Attorney   ANAND "LUCKY" JESRANI, SBN 238252
25	1355 West Street
26	Redding, CA 96001
	Telephone: (530) 245-6300
27	
28	

1	KRISHNA A. ABRAMS
2	Solano County District Attorney
	DIANE NEWMAN, SBN 179926
3	Deputy District Attorney 657 Texas Street, Suite 4500
4	Fairfield, CA 94533
	Telephone: (707) 784-6800
5	
6	JILL R. RAVITCH
	Sonoma County District Attorney MATTHEW T. CHEEVER, SBN 191783
7	Deputy District Attorney
8	2300 County Center Drive, Suite B-170
	Santa Rosa, CA 95403
9	Telephone: (707) 565-3161
10	BIRGIT A. FLADAGER
11	District Attorney Stanislaus County
11	RICHARD B. MURY, III, SBN 128771
12	832 12th Street, #300
13	Modesto, CA 95354
l	Telephone: (209) 525-5550
14	AMANDA L. HOPPER
15	District Attorney of Sutter County
1.0	ROBERT E. NICHOLS, SBN 100028
16	Deputy District Attorney 463 Second St
17	Yuba City, CA 95991
18	(530) 822-7330
10	
19	LAURA L. KRIEG
20	District Attorney of Tuolumne County ROBERT E. NICHOLS, SBN 100028
	Deputy District Attorney
21	423 N. Washington Street
22	Sonora, CA 95370
	Telephone: (209) 588-5450
23	GREGORY D. TOTTEN
24	Ventura County District Attorney
25	MITCHELL F. DISNEY, SBN 138114
23	Senior Deputy District Attorney
26	5720 Ralston Street, Suite 300 Ventura, CA 93003
27	Telephone: (805) 662-1750
28	
	11

# Exhibit A-1

# **Exhibit A-1 -- California Party City Facilities**

	Store				Store Open	Store Closure
4	#	Address	City	County	Date	Date
1	987	2251 S Shore Center	Alameda	Alameda	9/15/2017	
2		39210 Fremont HUB, Suite 211	Fremont	Alameda	10/5/2004	
3	644	4575 Rosewood Drive	Pleasanton	Alameda	1/27/1999	
4	635	15584 Hesperian Blvd	San Lorenzo	Alameda	7/20/1998	
5		30761 Dyer St	Union City	Alameda	11/16/1999	
6	444	2470 Sand Creek Rd	Brentwood	Contra Costa	12/2/2002	
7	419	4211 Century Blvd	Pittsburg	Contra Costa	9/5/2008	6/18/2016
8	1203	545 Contra Costa Blvd	Pleasant Hill	Contra Costa	12/29/1997	
9	626	3500A Klose Way	Richmond	Contra Costa	5/26/1998	
10	917	3460 Broadway	Eureka	Humboldt	12/8/2015	
11	401	3009 S Dogwood Rd	El Centro	Imperial	9/12/2008	
12	968	1842 W Lacey Ave	Hanford	Kings	12/23/2016	
13	544	2500 W Commonwealth Ave, B	Alhambra	Los Angeles	9/4/1996	
14	541	3060 Baldwin Park Blvd, Suite C-100	Baldwin Park	Los Angeles	6/22/1997	
15	1504	2011 N Hollywood Way	Burbank	Los Angeles	12/27/1997	
16	622	208 Towne Center Drive	Compton	Los Angeles	4/28/2009	
17	976	1100 Jefferson Blvd	Culver City	Los Angeles	12/16/2016	
18	607	7171 Firestone Blvd	Downey	Los Angeles	10/8/1997	
19	1521	12076 Lakewood Blvd	Downey	Los Angeles	5/19/2006	
20	965	7600 S Alameda St	Huntington Park	Los Angeles	12/19/2016	
21	1401	44600 Valley Central Way, Suite 103	Lancaster	Los Angeles	12/29/1997	
22	605	7571 Carson Blvd	Long Beach	Los Angeles	3/2/1999	
23	439	2935 Los Feliz Blvd	Los Angeles	Los Angeles	7/14/2004	
24	514	2480 S Sepulveda Blvd	Los Angeles	Los Angeles	9/28/1995	
25	1505	12121 W Pico Blvd	Los Angeles	Los Angeles	12/29/1997	
26	459	622 W Huntington Dr	Monrovia	Los Angeles	12/18/2002	
27	743	39451 10th Street West	Palmdale	Los Angeles	3/18/2011	
28	573	3353 E Foothill Blvd	Pasadena	Los Angeles	9/29/1998	
29	436	8620 Washington Blvd	Pico Rivera	Los Angeles	9/16/2002	1/6/2018
30	752	19389 Victory Blvd	Reseda	Los Angeles	8/8/2011	
31	580	852 W Arrow Hwy	San Dimas	Los Angeles	2/2/1998	
32	920	19037 Golden Valley Rd	Santa Clarita	Los Angeles	12/8/2015	
33	1517	27029 McBean Pkwy	Santa Clarita	Los Angeles	3/22/2002	
34	634	13360 E. Telegraph Road	Santa Fe Springs	Los Angeles	8/3/1998	
35	75	24333 Crenshaw Blvd	Torrance	Los Angeles	N/A	1/6/2013
36	669	19670 Hawthorne Blvd	Torrance	Los Angeles	9/15/1998	
37	1506	25361 Crenshaw Blvd	Torrance	Los Angeles	12/29/1997	
38	559	25670 The Old Rd	Valencia	Los Angeles	10/11/1997	1/5/2018
39	639	7882 Van Nuys Blvd	Van Nuys	Los Angeles	9/28/1998	
40	560	2620 E Workman Ave, Space 2	West Covina	Los Angeles	12/8/1998	
41	442	6559 Fallbrook Ave	West Hills	Los Angeles	1/24/2003	
42	1201	2056-2060 Redwood Hwy	Greenbrae	Marin	N/A	1/17/2010
43	420	208 Vintage Way, Suite K-19	Novato	Marin	9/21/1999	1/1/2018
44	837	125 Gen Stillwell Dr.	Marina	Monterey	12/6/2012	
45	470	1684 N Main St	Salinas	Monterey	1/24/2003	
46	506	418 N Euclid St	Anaheim	Orange	6/29/1996	
47	566	2485 E Imperial Hwy	Brea	Orange	3/11/1998	
48	874	2200 Harbor Blvd, Suite P-110	Costa Mesa	Orange	8/12/2013	
49	1512	1521 S Harbor Blvd	Fullerton	Orange	12/29/1997	
50	736	9661 Chapman Ave	Garden Grove	Orange	8/12/2011	2/16/2018

# Exhibit A-1 -- California Party City Facilities

	Store				Store Open	Store Closure
	#	Address	City	County	Date	Date
51	749	16100 Beach Blvd	Huntington Beach	Orange	9/21/1996	
52	520	1441 W. Imperial Hwy	La Habra	Orange	9/24/1996	
53	751	27110 Alicia Pkwy	Laguna Niguel	Orange	1/25/2002	
54		27835 Santa Margarita Pkwy	Mission Viejo	Orange	8/14/2002	
55		25410 Marguerite Pkwy	Mission Viejo	Orange	12/29/1997	
	679	763 S Main St	Orange	Orange	10/15/1998	
57	1520	1500 E Village Way, Suite 2364	Orange	Orange	5/9/2005	
58	76	3837 S Bristol St	Santa Ana	Orange	9/3/1993	
59	548	2826 El Camino Real	Tustin	Orange	12/16/1997	
60	563	1917 Douglas Blvd, Suite 89	Roseville	Placer	8/16/1997	9/17/2017
61	1301	6748 Stanford Ranch Rd	Roseville	Placer	8/13/1999	
62	934	300 S Highland Springs Ave, Unit 1-B	Banning	Riverside	9/9/2016	
63	1508	2415 Tuscany St, Suite 101	Corona	Riverside	3/22/2006	
64	918	3629 West Florida Avenue	Hemet	Riverside	1/29/2016	
65	760	42800 Jackson Ave	Indio	Riverside	8/5/2011	
66	883	30115 Haun Road	Menifee	Riverside	12/22/2015	
67	486	12339 Limonite Ave	Mira Loma	Riverside	7/13/2007	
68	906	5200 E Ramon Rd, Suite B-4	Palm Springs	Riverside	4/14/2015	
69	750	2550 Canyon Springs Pkwy, Suite H	Riverside	Riverside	9/25/2008	
70	882	6302 Sunrise Blvd	Citrus Heights	Sacramento	7/22/2014	
71	1304	7440 Laguna Blvd, 104	Elk Grove	Sacramento	2/5/2001	
72	1305	2780 E Bidwell St, 100	Folsom	Sacramento	3/26/2003	
73	9921	13000 Folsom Blvd, 201	Folsom	Sacramento	N/A	1/25/2010
74	449	1692 Arden Way	Sacramento	Sacramento	9/16/2002	
75	921	8222 Delta Shores Cir S	Sacramento	Sacramento	8/18/2017	
76	427	3850 Grand Ave	Chino	San Bernardino	9/7/2002	
77	582	5549 Philadelphia St, Ste B	Chino	San Bernardino	9/6/1997	
78	1513	4440 Ontario Mills Pkwy	Ontario	San Bernardino	N/A	1/3/2015
79	443	11098 Foothill Blvd, Suite 110	Rancho Cucamonga	San Bernardino	7/29/2002	1.0.2010
80	1510	27588 W Lugonia Ave	Redlands	San Bernardino	1/18/2005	
81	1509	338 South Mountain Blvd.	Upland	San Bernardino	8/27/2014	
82	1519	12410 Amargosa Rd, Suite B	Victorville	San Bernardino	9/26/2006	
83		624 Palomar St	Chula Vista	San Diego	10/3/1994	
84	521	40 North 4th Avenue, Suite 120	Chula Vista	San Diego	6/21/1997	
85	707	2015 Birch Road	Chula Vista	San Diego	2/19/2011	
86	524	160 N 2nd St	El Cajon	San Diego	n/a	4/4/2015
87	592	2883 Jamacha Rd, Suite 12-E	El Cajon	San Diego	12/2/1998	17-172010
88	526	1016 N El Camino Real	Encinitas	San Diego	2/3/1997	
89	445	1109 W. Valley Parkway	Escondido	San Diego	11/25/2002	
90	572	2130 Vista Way	Oceanside	San Diego	10/17/1997	
91	661	157 South Las Posas Road	San Marcos	San Diego	8/20/2010	
92	441	9850 Mission Gorge Rd	Santee	San Diego	10/9/2002	
93	703	1685 Bryant St	San Francisco	San Francisco	9/4/2010	
94	935	2350 W Kettleman Lane, Suite 130	Lodi	San Joaquin	4/21/2017	
95	1306	2475 Naglee Rd	Tracy	San Joaquin	N/A	11/6/2010
96	571	151B Serramonte Center, Second Floor	Daly City	San Mateo	9/21/1997	170/2010
97	1211	1289 Veterans Blvd	Redwood City	San Mateo	12/29/1997	
98	858	2410 S Broadway	Santa Maria	Santa Barbara	12/5/2013	
99	810	20740 Stevens Creek Blvd.	Cupertino	Santa Clara	5/4/2012	
	557	311 W Calaveras Blvd	Milpitas	Santa Clara	N/A	11/3/2013

# Exhibit A-1 -- California Party City Facilities

	Store #	Address	City	County	Store Open Date	Store Closure Date
101	867	1007 Cochrane Road	Morgan Hill	Santa Clara	2/11/2014	
102	700	645 San Antonio Road, Unit 501-3	Mountain View	Santa Clara	N/A	4/23/2011
103	546	1600 Saratoga Ave, Suite 303	San Jose	Santa Clara	9/5/1997	
104	614	1986 Tully Rd	San Jose	Santa Clara	3/20/1998	
105	638	863 Blossom Hill Rd	San Jose	Santa Clara	8/11/1998	
106	896	5650 Cottle Road	San Jose	Santa Clara	12/3/2014	
107	1218	1448 Kooser Rd	San Jose	Santa Clara	12/29/1997	
108	1217	2205 El Camino Real	Santa Clara	Santa Clara	N/A	1/17/2010
109	9930	1777 Hwy 273, Suite 19	Anderson	Shasta	N/A	4/25/2012
110	876	1613 Hilltop Drive, Suites E-K	Redding	Shasta	6/24/2014	
111	498	1574 Gateway Blvd	Fairfield	Solano	2/6/2008	
112	1204	141 Plaza Dr, Suite B	Vallejo	Solano	2/6/2001	
113	1101	2675 Santa Rosa Ave	Santa Rosa	Sonoma	7/1/2014	
114	624	2401 McHenry Ave	Modesto	Stanislaus	8/1/1998	
115	414	3015 N Tegner Rd	Turlock	Stanislaus	4/24/2009	
116	1516	211 W Esplanade Dr	Oxnard	Ventura	9/27/2001	
117	1515	415 Cochran St, Suite 100	Simi Valley	Ventura	3/10/2000	
118	446	2715 Teller Rd	Thousand Oaks	Ventura	9/6/2002	<del>                                     </del>
119	809	1386 E. Main Street	Woodland	Yolo	4/20/2012	<del>                                     </del>

# Exhibit A-2

	Store				1	Lease Start	
	Number	Address	City	State	County	Date	
1	8394	1511 Park Street	Alameda	CA	Alameda	09/19/11	11/01/11
2	8383	1001 Eastshore Highway	Albany	CA	Alameda	09/07/12	11/03/12
3	8281	1001 Eastshore Highway	Albany	CA	Alameda	09/04/13	11/03/13
4	8383	2190 Shattuck Ave	Berkeley	CA	Alameda	09/06/11	11/01/11
5	8385	4922 Dublin Blvd	Dublin	CA	Alameda	01/01/2018	
6	8369	4922 Dublin Blvd.	Dublin	CA	Alameda	2016	2016
7	8385	4922 Dublin Blvd.	Dublin	CA	Alameda	2017	2017
8	8319	39210 Fremont Hub, Ste 211	Fremont	CA	Alameda	09/06/11	11/02/11
9	8338	39210 Fremont Hub, Ste 211	Fremont	CA	Alameda	08/30/13	11/03/13
10	8399	39418 Fremont Boulevard	Fremont	CA	Alameda	09/02/14	11/02/14
11	8352	43484 Boscell Road	Fremont	CA	Alameda	09/12/14	
12	8399	43918 Boscell Road	Fremont	CA	Alameda	2016	2016
13	8314	664 Southland Mall	Hayward	CA	Alameda	09/06/11	11/02/11
14	8338	1600 N Vasco Road	Livermore	CA	Alameda	09/08/12	11/03/12
15	8319	4502 Las Positas	Livermore	CA	Alameda	2016	
16	8169	15100 Hesperian	San Leandro	CA	Alameda	2017	2017
17	8373	15100 Hesperian Blvd, Ste 400	San Leandro	CA	Alameda	09/08/11	11/02/11
18	8352	15555 E 14th St., Ste 200	San Leandro	CA	Alameda	8/1/2018	
19	8275	1515 Springfield Drive, Ste 150	Chico	CA	Butte	09/20/11	<del></del>
20	8330	801 East Ave, #240	Chico	CA	Butte	08/30/13	
21	8399	801 East Ave, Ste 1	Chico	CA	Butte	09/12/12	
22		980 Mangrove	Chico	CA	Butte	09/09/14	
23		5491 Lone Tree Way	Brentwood	CA	Contra Costa	09/11/12	
24		1659 Willow Pass Road	Concord	CA	Contra Costa	09/18/11	
25	8310	2400 Willow Pass, Ste D	Concord	CA	Contra Costa	09/23/14	+
26	8310	2400 Willow Pass, Ste D	Concord	CA	Contra Costa	09/11/15	
27		1212 Fitzgerald Drive	Pinole	CA	Contra Costa	09/09/11	
28		2100 North Park Boulevard	Pittsburg	CA	Contra Costa	09/06/11	
29	8319	1601 Contra Costa Blvd	Pleasant Hill	CA	Contra Costa	09/14/12	
30	8169	3500 Klose Way, Ste B	Richmond	CA	Contra Costa	09/30/14	
31		3700 Klose Way	Richmond	CA	Contra Costa	09/06/12	
32		4000 Klose Way	Richmond	CA	Contra Costa	09/14/15	
33		120 Sunset Drive	San Ramon	CA	Contra Costa	09/09/11	· · · · · · · · · · · · · · · · · · ·
34		1180 9th St	Crescent City	CA	Del Norte	09/07/12	
35		1626 Broadway Street	Eureka	CA	Humboldt	09/08/12	
36		3300 Broadway, Ste 804	Eureka	CA	Humboldt	09/16/13	
37		800 W Harris St, Ste 25	Eureka	CA	Humboldt	09/12/14	
38	_	800 W Harris St, Ste 25	Eureka	CA	Humboldt	09/19/15	
39		800 W Harris St., Ste 25	Eureka	CA	Humboldt	08/01/2018	
40	8400	800 W. Harris St #25	Eureka	CA	Humboldt	2016	
41		800 W. Harris St. #25	Eureka	CA	Humboldt	2017	
42		945 North Imperial Ave	El Centro	CA	Imperial	09/06/11	<del></del>
43		945 North Imperial Ave	El Centro	CA	Imperial	08/28/15	
44		110 South 11th Avenue	Hanford	CA	Kings	2016	
45		1842 W Lacey Blvd	Hanford	CA	Kings	09/06/11	
46		1842 W Lacey Blvd	Hanford	CA	Kings	09/07/12	
47		1842 W Lacey Blvd	Hanford	CA	Kings	09/06/13	
48		2555 Main St	Susanville	CA	Lassen	09/17/13	
49	<del></del>	846 East Valley Boulevard	Alhambra	CA	Los Angeles	09/26/15	
50		400 South Baldwin Ave, Ste 920L	Arcadia	CA	Los Angeles	09/23/11	
51		201 East Magnolia Blvd	Burbank	CA	Los Angeles	2016	
52		201 W Magnolia Blvd	Burbank	CA	Los Angeles	2017	

	Store	Awara war.	<u> </u>	I	1	Lease Start	
	Number	Address	City	State	County	Date	Date Closed
53	8211	683 N Victory Blvd	Burbank	CA	Los Angeles	07/15/2018	
54	8371	8201 Topanga Canyon Boulevard, Unit D	Canoga Park	CA	Los Angeles	08/08/2018	
55	8013	17510 Castleton St.	City of Industry	CA	Los Angeles	2016	2016
56	8346	17651 Colima Rd	City of Industry	CA	Los Angeles	09/06/11	11/02/11
57	8107	5730 Whittier Blvd	Commerce	CA	Los Angeles	08/15/2018	
58	8331	1318 North Azusa Avenue	Covina	CA	Los Angeles	09/03/15	11/03/15
59		11136 Jefferson Blvd	Culver City	CA	Los Angeles	08/10/2018	
60	8354	12056 Lakewood Blvd	Downey	CA	Los Angeles	09/06/11	11/02/11
61	8037	715 West Redondo Beach Boulevard	Gardena	CA	Los Angeles	09/19/15	11/03/15
62		12100 Carson St, Ste A	Hawaiian Gardens	CA	Los Angeles	09/24/13	11/03/13
63		1807 N Hacienda Blvd	La Puente	CA	Los Angeles	09/06/11	11/02/11
64	_	2333 Foothill Blvd	La Verne	CA	Los Angeles	09/24/13	11/03/13
65		1801 West Ave J	Lancaster	CA	Los Angeles	2016	2016
66		1810 W Avenue J	Lancaster	CA	Los Angeles	09/21/14	11/03/14
67		1810 W Avenue J	Lancaster	CA	Los Angeles	09/04/15	
68		24911 Western Ave	Lomita	CA	Los Angeles	09/13/12	11/03/13
69		450 The Promenade	Long Beach	CA	Los Angeles	2017	2017
70		450 The Promenade North	Long Beach	CA	Los Angeles	07/15/2018	
71		5545 E Stearns St	Long Beach	CA	Los Angeles	08/01/2018	
72		6274 E Pacific Coast Highway		CA			
73		6346 E. Pacific Coast Hwy	Long Beach	CA	Los Angeles	10/01/14	<del></del>
74		6346 East Pacific Coast Hwy	Long Beach	CA	Los Angeles	2017	
75		7440 Carson Blvd	Long Beach		Los Angeles	2016	
76			Long Beach	CA	Los Angeles	2016	
77		10861 Weyburn Ave Ste 202 11419 Santa Monica	Los Angeles	CA	Los Angeles	09/19/12	
78			Los Angeles	CA	Los Angeles	09/13/13	
$\overline{}$		1833 La Cienega Blvd, Ste A	Los Angeles	CA	Los Angeles	07/15/2018	
79		2905 Los Feliz Blvd	Los Angeles	CA	Los Angeles	08/15/2018	
80		3222 West Slauson Avenue	Los Angeles	CA	Los Angeles	09/29/15	
81		3443 S Sepulveda Blvd	Los Angeles	CA	Los Angeles	2016	
82 83		4550 West Pico Blvd	Los Angeles	CA	Los Angeles	2016	
<b>—</b>		4801 Venice Boulevard	Los Angeles	CA	Los Angeles	09/10/14	
84	-	5520 W Sunset Blvd	Los Angeles	CA	Los Angeles	09/17/11	<del></del>
85		5520 W Sunset Blvd	Los Angeles	CA	Los Angeles	09/12/12	
86		5525 W Sunset Blvd	Los Angeles	CA	Los Angeles	09/04/13	
87		8655 S Sepulveda Blvd	Los Angeles	CA	Los Angeles	09/01/11	
88		2401 West Via Campo	Montebello	CA	Los Angeles	09/25/15	
89		2022 South Atlantic Boulevard	Monterey Park	CA	Los Angeles	09/29/15	
90		39626 10th Street West, Suite G	Palmdale	CA	Los Angeles	09/23/15	
91		248 E Colorado Blvd	Pasadena	CA	Los Angeles	09/05/12	
92		345 S Lake Ave Ste 112	Pasadena	CA	Los Angeles	09/06/11	<del></del>
93		345 S Lake Ave, Ste 637-2	Pasadena	CA	Los Angeles	08/01/2018	
94	_	475 S Lake Ave	Pasadena	CA	Los Angeles	09/07/13	
95		475 S Lake Ave	Pasadena	CA	Los Angeles	09/03/14	
96		8850 Washington Boulevard, Suite A	Pico Rivera	CA	Los Angeles	10/01/15	
97		8950 Washington Blvd	Pico Rivera	CA	Los Angeles	10/01/14	
98		696 W Holt Ave	Pomona	CA	Los Angeles	08/22/2018	3
99	8390	28901 South Western Ave, Ste 137	Rancho Palos Verdes	CA	Los Angeles	09/06/11	11/02/11
100	8037	51B Peninsula Center	Rancho Palos Verdes	CA	Los Angeles	2016	2016
101	8351	19315 Saticoy Street, Unit C and E	Reseda	CA	Los Angeles	09/05/15	11/03/15
102	8004	51 Peninsula Center Suite B	Rolling Hills Estates	CA	Los Angeles	2017	2017
103		24445 Magic Mountain Pkway	San Clarita	CA	Los Angeles	2016	2016
104	8375	533 West Arrow Highway	San Dimas	CA	Los Angeles	09/21/13	

Exhibit A-2 -- California Halloween City Facilities

	Store					Lease Start	
	Number		City	State	County	Date	Date Closed
105	8314	802 West Arrow Highway	San Dimas	CA	Los Angeles	09/20/15	11/03/15
106	8378	1230 San Fernando Rd, Ste G	San Fernando	CA	Los Angeles	09/22/12	11/03/12
107		19037 Golden Valley Road	Santa Clarita	CA	Los Angeles	09/25/15	11/03/15
108		19201 Golden Valley Rd	Santa Clarita	CA	Los Angeles	09/07/11	11/02/11
109	77.00	13360 Telegraph Rd	Santa Fe Springs	CA	Los Angeles	09/08/15	11/03/15
110		826 Wilshire Blvd	Santa Monica	CA	Los Angeles	10/06/12	11/03/12
111	8398	4845 Firestone Boulevard	South Gate	CA	Los Angeles	09/25/15	11/03/15
112		4827 Firestone Blvd	South Gate	CA	Los Angeles	2016	2016
113	8346	26850 The Old Rd	Stevenson Ranch	CA	Los Angeles	09/02/15	11/03/15
114	8351	18131 Ventura Blvd	Tarzana	CA	Los Angeles	09/14/12	11/03/12
115	8358	18211 Ventura Blvd	Tarzana	CA	Los Angeles	09/07/11	11/02/11
116	8157	20026 Hawthorne Boulevard	Torrance	CA	Los Angeles	09/28/15	11/03/15
117	8218	24333 Crenshaw Blvd	Torrance	CA	Los Angeles	09/19/13	11/03/13
118	8328	16040 Sherman Way	Van Nuys	CA	Los Angeles	08/15/2018	
119	8382	7882 Van Nuys Blvd	Van Nuys	CA	Los Angeles	2017	2017
120	8142	7888-1 Van Nuys Blvd	Van Nuys	CA	Los Angeles	09/26/14	11/03/14
121	8379	7888-2 Van Nuys Boulevard	Van Nuys	CA	Los Angeles	09/19/15	
122	8289	7600 Alameda Street	Walnut Park	CA	Los Angeles	09/25/15	
123	8392	2753 E Eastland Center Dr, Ste 1450	West Covina	CA	Los Angeles	09/16/14	
124		2753 E Eastland Center Dr, Ste 1450	West Covina	CA	Los Angeles	09/16/15	<del></del>
125		22950 Victory Blvd	Woodland Hills	CA	Los Angeles	09/18/13	
126		22950 Victory Blvd	Woodland Hills	CA	Los Angeles	09/12/14	
127		23361 Mulholland Dr	Woodland Hills	CA	Los Angeles	09/06/11	11/02/11
128		180 Donahue Street	Marin City	CA	Marin	10/01/14	
129	8369	600 Francisco Blvd W	San Rafael	CA	Marin	08/10/2018	
130		901 S State Street	Ukiah	CA	Mendocino	09/16/11	11/02/11
131	8317	901 S State Street	Ukiah	CA	Mendocino	09/18/12	
132		901 S State Street	Ukiah	CA	Mendocino	09/14/13	
133	8275	901 S State Street	Ukiah	CA	Mendocino	09/05/14	
134	8321	901 S State Street	Ukiah	CA	Mendocino	09/12/15	
135		901 S State Street	Ukiah	CA	Mendocino	2016	
136		901 South State Street	Ukiah	CA	Mendocino	2017	
137		1321 East Pacheco Blvd Ste B	Los Banos	CA	Merced	09/06/12	
138		1742 W. Olive Ave.	Merced	CA	Merced	2017	<del></del>
139		1742 West Olive Avenue	Merced	CA	Merced	08/15/2018	
140		1742 West Olive Avenue	Merced	CA	Merced	09/20/15	
141		1742 West Olive Street	Merced	CA	Merced	2016	
142		1500 Del Monte	Monterey	CA	Monterey	09/12/12	
143		1231 N Davis Rd	Salinas	CA	Monterey	09/07/12	
144		1910 North Davis Road	Salinas	CA	Monterey	08/30/13	
145		2080 California Ave., Ste A	Sand City	CA	Monterey	08/01/2018	
146		1326 Main Street	Napa	CA	Napa	09/08/12	
147		3 1375 Imola Avenue	Napa	CA	<del></del>		
148		1375 W Imola Avenue	Napa	CA	Napa	2017	
149		3230 Jefferson St	Napa	CA	Napa	2016	
150		3230 Jefferson St	Napa	CA	Napa	09/10/13	
151		1660 West Katella	Anaheim	CA	Napa	09/06/14	
152		586 North Euclid Street	Anaheim	CA	Orange	09/06/11	11/01/11
153		220 S Brea Blvd			Orange	09/26/15	
154		3 1100 S Harbor Blvd	Brea	CA	Orange	09/06/11	<del></del>
155			Fullerton	CA	Orange	08/20/2018	
156		131 Imperial Hwy	Fullerton	CA	Orange	09/11/14	
120	0353	3 1361 S Harbor Blvd	Fullerton	CA	Orange	09/06/11	11/02/11

Exhibit A-2 -- California Halloween City Facilities

	Store					Lease Start	
457		Address	City	State	County		Date Closed
157		1361 S Harbor Blvd	Fullerton	CA	Orange	09/07/12	11/03/12
158		1521 South Harbor Blvd	Fullerton	CA	Orange	2016	2016
159		16672 Beach Blvd	Huntington Beach	CA	Orange	2017	2017
160		16672 Beach Blvd, Ste I	Huntington Beach	CA	Orange	09/07/14	11/02/14
161		16672 Beach Blvd., Ste L	Huntington Beach	CA	Orange	08/01/2018	
162		81 Technology Dr	Irvine	CA	Orange	09/17/13	11/03/13
163		24300 Laguna Hills Mall	Laguna Hills	CA	Orange	09/05/14	11/03/14
164		27200 Alicia Parkway	Laguna Niguel	CA	Orange	09/06/11	11/02/11
165		27871 La Paz Rd	Laguna Niguel	CA	Orange	08/15/2018	
166		23608 El Toro Rd	Lake Forest	CA	Orange	09/20/11	11/01/11
167		27785 Santa Margarita Pkwy	Mission Viejo	CA	Orange	10/05/15	11/03/15
168		28331 Marguerite Parkway	Mission Viejo	CA	Orange	09/09/11	11/02/11
169		146 S Main Street	Orange	CA	Orange	2016	2016
170		764 N. Tustin	Orange	CA	Orange	09/05/15	11/03/15
171		2725 North Bristol	Santa Ana	CA	Orange	09/10/11	11/02/11
172		3923 S. Bristol St	Santa Ana	CA	Orange	2016	2016
173		3923 S. Bristol St	Santa Ana	CA	Orange	10/06/15	11/03/15
174		2857 Park Ave	Tustin	CA	Orange	09/07/12	11/03/12
175		530 Westminster Mall	Westminster	CA	Orange	08/10/2018	
176	8362	6652 Lonetree Blvd	Rocklin	CA	Placer	09/06/11	11/02/11
177	8399	1159 Roseville Square	Roseville	CA	Placer	09/03/13	11/03/13
178	8344	1164 Galleria Blvd	Roseville	CA	Placer	09/10/11	11/02/11
179	8369	5781 Five Star Blvd, Ste 150	Roseville	CA	Placer	09/19/12	11/03/12
180	8014	5781 Five Star Blvd, Ste 150	Roseville	CA	Placer	09/12/15	
181	8359	5811 Five Star Blvd	Roseville	CA	Placer	2017	2017
182	8169	5811 Five Star Blvd	Roseville	CA	Placer	2016	
183	8014	6748 Stanford Ranch	Roseville	CA	Placer	09/26/14	
184	8253	6780 Stanford Ranch Rd	Roseville	CA	Placer	08/10/2018	
185	8351	34101 Date Palm Drive	Cathedral City	CA	Riverside	09/07/13	11/03/13
186	8382	34101 Date Palm Drive	Cathedral City	CA	Riverside	09/16/14	11/03/14
187	8308	68100 Ramon Road Ste D3	Cathedral City	CA	Riverside	09/08/11	11/02/11
188	8302	585 North McKinley Street	Corona	CA	Riverside	09/25/15	1
189	8211	1931 Hwy 79	Hemet	CA	Riverside	09/16/15	
190	8328	2200 W Florida Ave, Ste 600	Hemet	CA	Riverside	09/17/12	
191	8392	2200 W Florida Ave, Ste 600	Hemet	CA	Riverside	09/11/13	
192	8384	3629 W Florida Ave	Hemet	CA	Riverside	09/17/14	
193	8384	42225 Jackson Street, C	Indio	CA	Riverside	09/18/15	
194		78987 Hwy 111	La Quinta	CA	Riverside	09/24/15	
195		78987 Hwy 111	La Quinta	CA	Riverside	2017	
196		79190 Hwy 111	La Quinta	CA	Riverside	2016	
197		17600 Collier Avenue Ste J195	Lake Elsinore	CA	Riverside	09/18/11	11/02/11
198		18294 Collier Ave	Lake Elsinore	CA	Riverside	09/05/13	
199		12399 Limonite Avenue	Mira Loma	CA	Riverside	2016	
200		6237 Pats Ranch Road	Mira Loma	CA	Riverside		
201		6237 Pats Ranch Road	Mira Loma	CA	Riverside	2016	
202		6397 Pats Ranch Rd	Mira Loma	CA	Riverside	2017	
203		6397 Pats Ranch Rd	Mira Loma	CA	Riverside	08/01/2018	
204		6397 Pats Ranch Rd	Mira Loma	CA	Riverside	09/06/14	
205		12625 Frederick St Ste G	Moreno Valley	_		09/04/15	
206		27220 Eucalyptus Ave		CA	Riverside	09/08/11	11/02/11
207		27220 Eucalyptus Ave	Moreno Valley	CA	Riverside	09/13/12	
208		27300 Eucalyptus Ave	Moreno Valley	CA	Riverside	09/12/13	
200	0390	27 300 Eucalyptus Ave	Moreno Valley	CA	Riverside	2017	2017

Exhibit A-2 -- California Halloween City Facilities

	Store					Lease Start	
	Number	Address	City	State	County	Date	Date Closed
209	8390	27300 Eucalyptus Avenue	Moreno Valley	CA	Riverside	09/16/14	11/03/14
210	8006	27300 Eucalyptus Avenue	Moreno Valley	CA	Riverside	09/08/15	11/03/15
211	8218	27300 Eucalyptus	Moreno Valley	CA	Riverside	2016	2016
212	8142	24422 Village Walk Place	Murrieta	CA	Riverside	2017	2017
213	8346	24510 Village Walk Place	Murrieta	CA	Riverside	2016	2016
214	8364	24510 Village Walk Place	Murrieta	CA	Riverside	09/06/11	11/02/11
215		24510 Village Walk Place	Murrieta	CA	Riverside	09/12/12	11/03/12
216		24510 Village Walk Place	Murrieta	CA	Riverside	09/12/13	11/03/13
217		24510 Village Walk Place	Murrieta	CA	Riverside	08/29/14	11/03/14
218		24510 Village Walk Place	Murrieta	CA	Riverside	08/28/15	11/03/15
219		200 Hidden Valley Pkwy	Norco	CA	Riverside	09/25/12	11/03/12
220		72-800 Highway 111	Palm Desert	CA	Riverside	09/06/11	11/02/11
221		72885 Highway 111	Palm Desert	CA	Riverside	09/05/14	11/02/11
222		2663 Canyon Spring Parkway	Riverside	CA	Riverside	08/29/14	11/03/14
223		2663 Canyon Spring Parkway	Riverside	CA	Riverside	08/31/15	11/03/14
224		4135 A Chicago Avenue, Unit 120	Riverside	CA	Riverside	2017	2017
225		32909 Temecula Parkway	Temecula	CA	Riverside	09/22/15	
226		7423 Fair Oaks Blvd, Ste 1	Carmichael	CA	Sacramento		11/03/15
227		7263 Greenback Lane	Citrus Heights	CA		09/24/12	11/03/12
228		7999 Greenback Lane		_	Sacramento	09/10/11	11/02/11
229		7999 Greenback Lane	Citrus Heights	CA	Sacramento	09/15/12	. 11/03/12
230		9163 East Stockton Boulevard, #360	Citrus Heights Elk Grove	CA CA	Sacramento Sacramento	09/19/13	
231		5229 Hazel Avenue	Fair Oaks	CA		09/20/15	
232		205 Serpa Drive	Folsom	CA	Sacramento	2016	
233		2310 Sunrise Blvd Ste 1	Gold River		Sacramento	09/06/11	11/02/11
234		3641 Elkhorn Boulevard		CA	Sacramento	09/13/12	
235		10801 Olsen Drive	North Highlands	CA	Sacramento	09/13/11	11/02/11
			Rancho Cordova	CA	Sacramento	09/25/12	
236		10801 Olsen Drive	Rancho Cordova	CA	Sacramento	09/25/15	
237		10801 Olson Drive	Rancho Cordova	CA	Sacramento	2016	
238		1700 Arden Way	Sacramento	CA	Sacramento	09/15/15	<del></del>
239		1700 Arden Way	Sacramento	CA	Sacramento	2016	
240		1703 Arden Way	Sacramento	CA	Sacramento	08/23/2018	
241		1821 Exposition Blvd	Sacramento	CA	Sacramento	09/10/11	
242		3684 North Freeway Boulevard	Sacramento	CA	Sacramento	09/19/15	11/03/15
243		4750 Natomas Blvd	Sacramento	CA	Sacramento	09/06/11	
244		6071 Florin Rd	Sacramento	CA	Sacramento	09/14/13	11/03/13
245		6071 Florin Rd	Sacramento	CA	Sacramento	08/29/14	11/03/14
246		6071 Florin Rd	Sacramento	CA	Sacramento	09/11/15	11/03/15
247		6081 Florin Road	Sacramento	CA	Sacramento	2016	2016
248	8364	3833 Grand Ave	Chino	CA	San Bernardino	09/12/12	11/03/12
249	8382	12949 Peyton Dr, Suite A	Chino Hills	CA	San Bernardino	09/09/11	11/02/1
250	8386	13017 Peyton Drive	Chino HIIIs	CA	San Bernardino	09/12/13	11/03/13
251	8006	13017 Peyton Drive	Chino HIIIs	CA	San Bernardino	09/27/14	
252	8380	13017 Peyton Drive	Chino HIIIs	CA	San Bernardino	08/31/15	
253	8392	13017 Peyton Drive	Chino Hills	CA	San Bernardino	2016	
254	831	1125 N Mount Vernon	Colton	CA	San Bernardino	09/20/13	
255	8289	17052 Slover Ave, Ste 101J	Fontana	CA	San Bernardino	09/13/12	
256		1 17052 Slover Ave, Ste 101J	Fontana	CA	San Bernardino	09/09/11	
257		1 17052 Slover Ave, Ste 101J	Fontana	CA	San Bernardino	09/14/13	
258		1 17093 Valley Blvd	Fontana	CA	San Bernardino	08/01/2018	
259		5 5065 E Montclair Plaza Ln	Montclair	CA	San Bernardino	09/01/11	
260		5 5065 E Montclair Plaza Ln	Montclair	CA	San Bernardino	09/05/12	

	Store Number	Address	City	State	County	Lease Start Date	
261		4120 E 4th St, Ste A	Ontario	CA	San Bernardino	09/07/12	
262		4440 Ontario Mills Parkway	Ontario	CA	San Bernardino		11/03/12
263		735 N Milliken Ave Ste A	Ontario	CA		08/30/15	11/03/15
264		10690 Foothill Blvd			San Bernardino	09/06/11	11/02/11
265		10828 Foothill Boulevard, Suite 120	Rancho Cucamonga	CA	San Bernardino	09/20/13	
266		11530 Fourth St., Ste 110	Rancho Cucamonga	CA	San Bernardino	09/27/15	11/03/15
267		12370 South Mainstreet	Rancho Cucamonga	CA	San Bernardino	08/01/2018	
268		12489 Foothill Blvd	Rancho Cucamonga	CA	San Bernardino	09/26/11	11/02/11
269			Rancho Cucamonga	CA	San Bernardino	09/13/14	
270		6401 Haven	Rancho Cucamonga	CA	San Bernardino	09/14/14	
		9950 Foothills Blvd	Rancho Cucamonga	CA	San Bernardino	2016	
271		1380 Industrial Park Ave	Redlands	CA	San Bernardino	2017	2017
272		700 E Redlands Blvd., B3	Redlands	CA	San Bernardino	09/16/15	
273		700 Redlands Blvd #3	Redlands	CA	San Bernardino	2016	
274		1295 E 19th St	Upland	CA	San Bernardino	08/15/2018	
275		333 South Mountain Ave	Upland	CA	San Bernardino	2016	
276		333 South Mountain Avenue	Upland	CA	San Bernardino	09/07/14	11/03/14
277		333 South Mountain Avenue	Upland	CA	San Bernardino	08/30/15	11/03/15
278		333 S. Mountain Ave	Upland	CA	San Bernardino	2017	2017
279		12250 Amargosa Rd	Victorville	CA	San Bernardino	2016	2016
280		12250 Amargosa Rd	Victorville	CA	San Bernardino	2017	2017
281		12410 Amargosa Rd	Victorville	CA	San Bernardino	09/25/14	11/02/14
282	8368	12410 Amargosa Rd	Victorville	CA	San Bernardino	08/31/15	11/02/15
283	8289	12550 Amargosa Road, A	Victorville	CA	San Bernardino	07/15/2018	
284	8200	14598 7th St, Ste B	Victorville	CA	San Bernardino	09/21/13	11/03/13
285		14601 Valley Center Dr	Victorville	CA	San Bernardino	09/06/11	11/02/11
286	8363	14601 Valley Center Dr	Victorville	CA	San Bernardino	09/07/12	11/01/12
287	8331	33616 Yucaipa Blvd	Yucaipa	CA	San Bernardino	09/06/11	11/02/11
288	8331	33616 Yucaipa Blvd	Yucaipa	CA	San Bernardino	09/06/12	
289	8331	33616 Yucaipa Blvd	Yucaipa	CA	San Bernardino	2016	
290	8311	40 N Fourth Ave	Chula Vista	CA	San Diego	09/18/14	11/03/14
291	8371	555 Broadway, Ste 1064	Chula Vista	CA	San Diego	09/18/12	<del></del>
292	8339	865 E H St	Chula Vista	CA	San Diego	08/01/2018	
293	8289	2015 Birch St, Suite 150	Chula Vista/Otay	CA	San Diego	2017	
294	8280	220 North El Camino Real	Encinitas	CA	San Diego	09/22/11	
295	_	1270 Auto Park Way, Suite A	Escondido	CA	San Diego	2017	
296		820 W Valley Parkway, Ste 280	Escondido	CA	San Diego	09/25/14	
297		3605 Avocado Blvd	La Mesa	CA	San Diego	10/03/12	
298		8790 Grossmont Blvd	La Mesa	CA	San Diego	08/01/2018	
299		7044 Broadway	Lemon Grove	CA	San Diego	09/22/15	
300		1100 E 30th St	National City	CA	San Diego	07/01/2018	
301		3003 Highland Ave Ste G	National City	CA	San Diego		
302		3410 Highland Ave	National City	CA		09/27/12	
303		2134 Vista Way	Oceanside		San Diego	2016	
304		2134 Vista Way		CA	San Diego	08/12/2018	<del></del>
305		2180 Vista Way Ste B	Oceanside	CA	San Diego	2017	
306			Oceanside	CA	San Diego	09/19/12	
		2180 Vista Way, Ste B	Oceanside	CA	San Diego	09/17/13	
307		2180 Vista Way, Ste B	Oceanside	CA	San Diego	09/24/14	
308		2180 Vista Way, Ste B	Oceanside	CA	San Diego	09/04/15	
309		2335 Vista Way	Oceanside	CA	San Diego	09/06/11	11/02/11
310		443 College Blvd	Oceanside	CA	San Diego	2016	2010
311		815 College Blvd	Oceanside	CA	San Diego	09/29/14	11/03/14
312	8348	1706 Descanso Ave	San Marcos	CA	San Diego	09/12/12	11/03/12

	Store	1		1		Lease Start	
		Address	City	State	County	Date	Date Closed
313	8311	294 Town Center Pkwy	Santee	CA	San Diego	09/07/12	11/03/12
314		9759 Mission Gorge Rd	Santee	CA	San Diego	09/13/14	11/03/14
315		32909 Hwy 79 S	Temecula	CA	San Diego	2016	2016
316		1744 University Drive	Vista	CA	San Diego	09/25/15	11/03/15
317		225 Vista Village Dr	Vista	CA	San Diego	09/06/11	11/02/11
318		760 Sycamore Ave	Vista	CA	San Diego	2016	2016
319		4548 Camino de la Plaza	San Ysidro	CA	San Diego	09/21/13	11/03/13
320	8253	160 Church Street	San Francisco	CA	San Francisco	2016	2016
321		160 Church Street	San Francisco	CA	San Francisco	09/18/11	11/02/11
322		2598 Taylor St	San Francisco	CA	San Francisco	09/15/12	11/03/12
323		2675 Geary Blvd. Ste. 202	San Francisco	CA	San Francisco	09/10/11	11/02/11
324		2418 W Kettleman Lane	Lodi	CA	San Joaquin	09/06/11	11/02/11
325		280 West Kettleman Ln	Lodi	CA	San Joaquin	08/30/13	11/03/13
326	-,	1055 S Main St	Manteca	CA	San Joaquin	09/06/11	11/03/13
327		1255 W Yosemite Avenue	Manteca	CA	San Joaquin	09/10/13	11/02/11
328		1255 W Yosemite Avenue	Manteca	CA	San Joaquin	09/15/14	11/03/13
329		1255 W Yosemite Avenue	Manteca	CA	San Joaquin	09/04/15	11/03/14
330		269 Spreckels Avenue	Manteca	CA	San Joaquin	09/05/12	11/03/13
331		10916 Trinity Parkway	Stockton	CA	San Joaquin	2016	2016
332		6575 Pacific Ave	Stockton	CA	San Joaquin	08/01/2018	2016
333		2471 Robertson Rd/2471-3B Naglee Road		CA			0047
334		2473 Naglee Rd			San Joaquin	2017	2017
335			Tracy	CA	San Joaquin	09/23/14	11/03/14
336		2473 Naglee Rd	Tracy	CA	San Joaquin	09/11/15	11/03/15
		2960 W Grant Line Rd	Tracy	CA	San Joaquin	09/14/12	11/03/12
337		3200 North Naglee Road	Tracy	CA	San Joaquin	2016	
338 339		194 Niblick Rd	Paso Robles	CA	San Luis Obispo	09/06/11	11/01/11
$\overline{}$		243 Madonna Road	San Luis Obispo	CA	San Luis Obispo	2016	
340		323 Madonna Rd	San Luis Obispo	CA	San Luis Obispo	08/29/14	
341		323 Madonna Rd	San Luis Obispo	CA	San Luis Obispo	09/09/15	
342		1 Colma Blvd, Unit 1	Colma	CA	San Mateo	09/23/11	11/02/11
343		5045 Junipero Serra Blvd	Colma	CA	San Mateo	08/15/2018	
344		317 Gellert Blvd	Daly City	CA	San Mateo	2017	2017
345		420 Westlake Center	Daly City	CA	San Mateo	09/06/12	
346		2250 Bridgepointe Drive	San Mateo	CA	San Mateo	2016	
347		2270 Bridgepointe Pkwy	San Mateo	CA	San Mateo	08/10/2018	
348		170 El Camino Real	South San Francisco	CA	San Mateo	09/12/14	
349		6990 Marketplace Dr	Goleta	CA	Santa Barbara	09/17/12	
350		701 North H St	Lompoc	CA	Santa Barbara	09/12/11	<del>                                     </del>
351		1315 S Bradley Rd	Santa Maria	CA	Santa Barbara	08/01/2018	
352		1315 S Bradley Rd	Santa Maria	CA	Santa Barbara	09/08/11	
353		1321 S Bradley Road	Santa Maria	CA	Santa Barbara	09/07/13	11/03/13
354		1447 South Broadway	Santa Maria	CA	Santa Barbara	08/28/15	<del></del>
355		1844 N Broadway	Santa Maria	CA	Santa Barbara	09/16/14	11/03/14
356		2410 S Broadway	Santa Maria	CA	Santa Barbara	09/12/12	11/03/12
357		8777 San Ysidro Avenue	Gilroy	CA	Santa Clara	09/08/11	11/02/11
358		8777 San Ysidro Avenue	Gilroy	CA	Santa Clara	09/17/14	11/03/14
359		950 Renz Lane, Ste 10	Gilroy	CA	Santa Clara	09/06/12	11/03/12
360	8365	128 Ranch Dr	Milpitas	CA	Santa Clara	09/07/12	11/03/12
361	8388	1007 Cochrane Rd	Morgan Hill	CA	Santa Clara	09/06/11	11/02/11
362	8275	1007 Cochrane Rd	Morgan Hill	CA	Santa Clara	09/05/12	
363	8314	850 E Dunne Rd	Morgan Hill	CA	Santa Clara	09/14/13	
364	8201	1939 West El Camino	Mountain View	CA	Santa Clara	2016	

Exhibit A-2 -- California Halloween City Facilities

	Store				T	Lease Start	
	Number	Address	City	State	County	Date	Date Closed
365	8310	2580 California Street	Mountain View	CA	Santa Clara	09/16/13	11/03/13
366	8314	2580 California Street	Mountain View	CA	Santa Clara	09/15/14	11/03/14
367	8361	456 University Ave	Palo Alto	CA	Santa Clara	09/17/13	11/01/13
368		1048 South White Road	San Jose	CA	Santa Clara	09/06/11	11/02/11
369	8021	1328 Saratoga Avenue	San Jose	CA	Santa Clara	09/23/15	11/03/15
370	8300	2171 Monterery Highway	San Jose	CA	Santa Clara	2017	2017
371	8107	2171 Monterey Highway	San Jose	CA	Santa Clara	09/22/15	11/03/15
372		2200 Eastridge Loop #1402	San Jose	CA	Santa Clara	2017	2017
373	8361	4095 Evergreen Village	San Jose	CA	Santa Clara	09/21/15	11/03/15
374	8352	868A Blossom Hill Road	San Jose	CA	Santa Clara	09/06/11	11/02/11
375	8399	52 North Winchester Blvd	Santa Clara	CA	Santa Clara	09/06/11	11/02/11
376	8281	1175 Dana Drive	Redding	CA	Shasta	09/06/11	11/02/11
377	8317	85 Hartnell Ave	Redding	CA	Shasta	09/06/13	11/03/13
378	8399	1320 Gateway Boulevard	Fairfield	CA	Solano	09/10/15	11/03/15
379	8352	1320 Gateway Boulevard	Fairfield	CA	Solano	2016	2016
380	8319	1400 Gateway Blvd	Fairfield	CA	Solano	08/10/2018	
381	8400	1590 Gateway Blvd	Fairfield	CA	Solano	09/23/14	11/03/14
382	8330	1041 Helen Power Dr	Vacaville	CA	Solano	2016	2016
383	8330	1041 Helen Power Dr.	Vacaville	CA	Solano	09/23/11	11/02/11
384	8369	220 Peabody Road	Vacaville	CA	Solano	09/03/15	
385		946 Admiral Callaghan Lane	Vallejo	CA	Solano	09/19/15	
386		952 Admiral Callaghan Way	Vallejo	CA	Solano	2017	2017
387		389 S McDowell	Petaluma	CA	Sonoma	2017	2017
388	8321	2720 Santa Rosa Ave	Santa Rosa	CA	Sonoma	09/15/12	
389	8338	2720 Santa Rosa Ave	Santa Rosa	CA	Sonoma	09/18/14	
390		900 Coddingtown Center	Santa Rosa	CA	Sonoma	09/13/11	11/02/11
391		1657 East Hatch Road	Modesto	CA	Stanislaus	09/09/14	
392		2401 McHenry	Modesto	CA	Stanislaus	2016	
393		2401 McHenry Ave	Modesto	CA	Stanislaus	09/08/12	
394		2401 McHenry Ave	Modesto	CA	Stanislaus	09/10/13	
395		2401 McHenry Ave	Modesto	CA	Stanislaus	09/24/14	
396		2401 McHenry Ave	Modesto	CA	Stanislaus	09/04/15	
397		3214 Countryside Drive	Turlock	CA	Stanislaus	08/06/2018	
398		3214 Countryside Drive	Turlock	CA	Stanislaus	08/29/14	
399		751 N. Golden State Blvd	Turlock	CA	Stanislaus	2016	
400		700 A West Onstott Frontage Rd	Yuba City	CA	Sutter	08/15/2018	
401		704 West Onstott Road	Yuba City	CA	Sutter	09/06/13	
402		714 West Onstott Frontage Road	Yuba City	CA	Sutter	2016	
403		714 West Onstott Frontage Road	Yuba City	CA	Sutter	09/05/12	
404		714 West Onstott Frontage Road	Yuba City	CA	Sutter	09/03/12	
405		714 West Onstott Frontage Road	Yuba City	CA	Sutter	08/31/15	
406		714 West Onstott Frontage Road	Yuba City	CA	Sutter	2017	
407		1031 Sanguinetti Road	Sonora	CA	Tuolumne	09/07/13	
408		2291 Pickwick	Camarillo	CA	Ventura	09/07/13	
409		195 W. Esplanade Dr. #43	Oxnard	CA	Ventura	2017	
410		3 201 West Esplanade	Oxnard	CA	Ventura	09/04/15	
411	<b>—</b>	2301 N Rose Ave	Oxnard	CA	Ventura	09/04/13	
412		3 431 W Esplanade Drive	Oxnard	CA	Ventura	09/18/12	
413		2358 Tapo Street	Simi Valley				
414		3 2974 Cochran Street		CA	Ventura	09/23/14	
414			Simi Valley	CA	Ventura	08/28/15	
		3 2974 Cochran Street	Simi Valley	CA	Ventura	2017	
416	l 838,	1 2974 Cochran Street	Simi Valley	CA	Ventura	2016	2016

	Store Number	Address	City	State	County	Lease Start Date	Date Closed
417	8374	2825 Johnson Drive	Ventura	CA	Ventura	09/06/11	11/02/11
418	8400	2975 Johnson Drive	Ventura	CA	Ventura	08/10/2018	
419	8376	1321 W Covell Blvd, Ste 119	Davis	CA	Yolo	09/06/11	11/02/11
420	8003	212 F Street	Davis	CA	Yolo	09/16/12	11/03/12
421	8327	1386 East Main Street	Woodland	CA	Yolo	09/06/11	11/02/11
422	8369	202 D St.	Marysville	CA	Yuba	09/06/11	11/02/11