

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
MATTHEW J. GOLDMAN (SBN 113330)
Department of Justice - Office of the Attorney General
1300 I Street, Suite 125, P.O. Box 944255
Sacramento, CA 94244-2550
TELEPHONE NO.: (916) 324-4223 FAX NO.:
ATTORNEY FOR (Name): People of the State of CA ex rel SWRCB

FOR COURT USE ONLY

FILED
Superior Court Of California,
Sacramento
09/22/2011
immeraz
By _____, Deputy
Case Number:
04-2011-00111230

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento
STREET ADDRESS: 720 Ninth Street
MAILING ADDRESS: 720 Ninth Street
CITY AND ZIP CODE: Sacramento, CA 95814
BRANCH NAME: Gordon D. Schaber Downtown Courthouse

CASE NAME:
People v. B.Z. Service Station, et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:
JUDGE:
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): One

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case (You may use form CM-015)

Date: 09/22/11
MATTHEW J. GOLDMAN

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
 - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
 - Auto Subrogation
 - Other Coverage
- Other Contract (37)
 - Contractual Fraud
 - Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ—Administrative Mandamus
 - Writ—Mandamus on Limited Court Case Matter
 - Writ—Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment (*non-domestic relations*)
 - Sister State Judgment
 - Administrative Agency Award (*not unpaid taxes*)
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
 - Declaratory Relief Only
 - Injunctive Relief Only (*non-harassment*)
 - Mechanics Lien
 - Other Commercial Complaint Case (*non-tort/non-complex*)
 - Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief From Late Claim
 - Other Civil Petition

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

**B. Z. SERVICE STATION MAINTENANCE, INC., PAUL E. ENSELE,
JAMES A. WILLIAMS, RHOME M. DESBIENS, and DOES ONE
through TEN, inclusive.**

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

**PEOPLE OF THE STATE OF CALIFORNIA ex rel.
THE STATE WATER RESOURCES CONTROL BOARD**

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

SACRAMENTO COUNTY SUPERIOR COURT
720 Ninth Street, Sacramento, CA 95814

CASE NUMBER:
Número del caso

34-011-0011230

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Matthew J. Goldman, Deputy Attorney General (SBN 113330) (916) 324-4223

Department of Justice - Office of the Attorney General
1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550

(Fecha) SEP 22 2011

(Secretario)

M. MERAZ

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):
3. on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4. by personal delivery on (date):

1 KAMALA D. HARRIS
Attorney General of California
2 DENISE F. HOFFMAN
Supervising Deputy Attorney General
3 MATTHEW J. GOLDMAN
Deputy Attorney General
4 State Bar No. 113330
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 324-4223
Fax: (916) 327-2319
7 E-mail: Matthew.Goldman@doj.ca.gov

Attorneys for Plaintiff
8 *People of the State of California ex rel. The State*
Water Resources Control Board

EXEMPT FROM FILING FEES
[GOV. CODE § 6103]
FILED
Superior Court Of California,
Sacramento
09/22/2011
mimeraz
By _____, Deputy
Case Number:
34-2011-00111230

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SACRAMENTO

13 **PEOPLE OF THE STATE OF**
14 **CALIFORNIA ex rel. THE STATE**
15 **WATER RESOURCES CONTROL**
BOARD,

16 Plaintiff,

17 v.

18 **B. Z. SERVICE STATION**
19 **MAINTENANCE, INC., PAUL E.**
20 **ENSELE, JAMES A. WILLIAMS, RHOME**
21 **M. DESBIENS, and DOES ONE through**
TEN, inclusive,

22 Defendants.

CASE NO.:

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

Department
Assignments
Case Management 36
Law and Motion 53
Minors Compromise 24

23
24 Plaintiff the People of The State of California ex rel. the State Water Resources Control
25 Board (State Water Board) alleges on information and belief as follows:

26 1. Plaintiff brings this action against Defendants B. Z. Service Station Maintenance,
27 Inc., Paul E. Ensele, James A. Williams, Rhome M. Desbiens, and Does 1 through 10 to obtain
28

1 civil penalties and injunctive relief pursuant to Health and Safety Code sections 25284.4 and
2 25299.01.

3 2. The State Water Board is a public agency of the State of California. The State Water
4 Board's jurisdiction includes the regulation and protection of the waters of the State of California,
5 including its rivers, creeks, and groundwater.

6 3. B. Z. Service Station Maintenance, Inc., is a California corporation with its principal
7 place of business located in West Sacramento, California. It provides technical services regarding
8 the maintenance of service station equipment, including inspecting and performing tank integrity
9 tests on underground storage tanks.

10 4. Paul E. Ensele is and was at all relevant times herein the Responsible Managing
11 Officer of B. Z. Service Station Maintenance, Inc., is also its Agent for Service of Process, and
12 maintains an address in West Sacramento, California.

13 5. James A. Williams is and was at all relevant times herein an employee, associate,
14 assistant, or agent of B. Z. Service Station Maintenance, Inc.

15 6. Rhome M. Desbiens is and was at all relevant times herein an employee, associate,
16 assistant, or agent of B. Z. Service Station Maintenance, Inc.

17 7. Plaintiff is not aware of the true names and capacities of the defendants sued as Does
18 1 through 10, inclusive, and therefore sues these defendants by such fictitious names, pursuant to
19 Code of Civil Procedure section 474. Each of these fictitiously named defendants is responsible
20 in some manner for the activities alleged in this complaint. Plaintiffs will amend this complaint
21 to add the true names of the fictitiously named defendants once they are discovered.

22 8. Hereinafter, B. Z. Service Station Maintenance, Inc., Paul E. Ensele, James A.
23 Williams, Rhome M. Desbiens, and Does 1 through 10 are collectively referred to as the
24 Defendants.

25 9. At all relevant times, each Defendant committed the acts, caused or directed others to
26 commit the acts, ratified the acts, or permitted others to commit the acts alleged in this complaint.
27 Additionally, some or all of the Defendants acted as the agent of the other Defendants, and all of
28 the Defendants acted within the scope of their agency if acting as an agent of another.

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2 **FIRST CAUSE OF ACTION:**
3 **PERFORMING TANK INTEGRITY TESTS WITHOUT A CURRENTLY VALID TANK**
4 **TESTING LICENSE FROM THE STATE WATER BOARD**
5 **(Against All Defendants)**

6 14. Plaintiff incorporates by this reference each and all of the allegations contained in
7 paragraphs 1 through 13 of this complaint, as though fully set forth herein.

8 15. Between 2006 and 2009, Defendants performed tank integrity tests, engaged in the
9 business of tank integrity testing, and acted in the capacity of a tank tester at least 12 times in
10 California.

11 16. Between 2006 and 2009, B. Z. Service Station Maintenance, Inc.'s employees,
12 associates, assistants, or agents, including James A. Williams, performed at least 11 tank integrity
13 tests without having a currently valid tank testing license from the State Water Board and without
14 being under the direct and personal supervision of someone having such a license. This violated
15 California Health and Safety Code section 25284.4, subdivisions (a) and (e) (1). In addition, on
16 or about December 4, 2009, James A. Williams, performed three tank integrity tests in
17 conjunction with Rhome M. Desbiens, a licensee who did not possess a valid manufacturer
18 training certification for equipment used to perform the tank integrity tests. This violated
19 California Code of Regulations, title 23, sections 2715, subdivision (i), and 2771, subdivision (c),
20 and Health and Safety Code section 25284.4, subdivision (e)(1).

21 17. B. Z. Service Station Maintenance, Inc., and Paul E. Ensele, as its Responsible
22 Managing Officer, are liable, pursuant to Health and Safety Code section 25284.4, subdivision (g)
23 (1), for a civil penalty of up to \$2,500 per day for each unlawful tank integrity test performed by
24 any of their employees, associates, assistants, or agents, including James A. Williams and Rhome
25 M. Desbiens.

26 18. James A. Williams is liable, pursuant to Health and Safety Code section 25284.4,
27 subdivision (g)(1), for a civil penalty of up to \$2,500 per day for each unlawful tank integrity test
28 that he performed.

1 19. Rhome M. Desbiens is liable, pursuant to Health and Safety Code section 25284.4,
2 subdivision (g)(1), for a civil penalty of up to \$2,500 per day for each unlawful tank integrity test
3 that he performed.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, plaintiff seeks judgment against each and all of the defendants as
6 follows:

7 1. For civil penalties in an amount to be determined at the time of trial, but in a total
8 amount of no less than \$30,000.00.

9 2. For a permanent injunction to enjoin Defendants and their employees, associates,
10 assistants, or agents, as well as B. Z. Service Station Maintenance, Inc.'s officers, directors,
11 principals, agents, representatives, employees, successors, and assignees, and all persons,
12 corporations and other entities acting by, through, under or on behalf of any one or more of the
13 Defendants, or acting in concert or participation with any one or more of the Defendants, which
14 enjoins Defendants as follows:

15 (a) B. Z. Service Station Maintenance, Inc., shall not engage in the business of tank
16 integrity testing or allow any employee, associate, assistant, or agent to act in the capacity
17 of a tank tester unless those tests are performed by (or under the direct and personal
18 supervision of) testers with currently valid tank testing licenses from the State Water Board,
19 in accordance with Health and Safety Code section 25284.4, subdivision (a).

20 (b) James A. Williams shall not engage in the business of tank integrity testing or
21 act in the capacity of a tank tester unless he has a currently valid tank testing license from
22 the State Water Board, in accordance with Health and Safety Code section 25284.4,
23 subdivision (a).

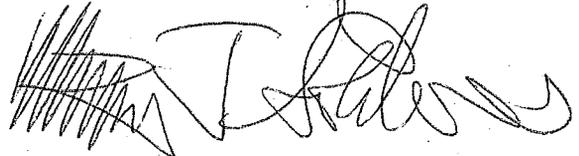
24 (c) Rhome M. Desbiens shall not engage in the business of tank integrity testing or
25 act in the capacity of a tank tester unless he has a currently valid tank testing license from
26 the State Water Board, in accordance with Health and Safety Code section 25284.4,
27 subdivision (a), including having a valid manufacturer training certification for equipment
28 used to perform any and all tank integrity tests;

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- 3. For plaintiff's costs of suit; and
- 4. For such other and further relief as the Court deems just and proper.

Dated: September 22, 2011

KAMALA D. HARRIS
Attorney General of California
DENISE F. HOFFMAN
Supervising Deputy Attorney General



MATTHEW J. GOLDMAN
Deputy Attorney General
Attorneys for Plaintiff
People of the State of California ex rel. The
State Water Resources Control Board

**[Note: Code Civ. Proc., § 446 requires verification of the Answer to this Complaint.
General denials are not permitted in verified answers.]**

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