

**CLAIM
COUNTY OF SANTA BARBARA**

PLEASE RETURN ORIGINAL AND ONE COPY TO:

COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS
105 EAST ANAPAMU STREET, SUITE 407
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CLERK OF THE BOARD, TIME STAMP

A. NAME AND ADDRESS OF THE CLAIMANT:

Craig Cullen
1127 Parkland
Santa Maria, CA 93455

TELEPHONE: (805) 878-9871

EMAIL (optional): cullenlandscaping805@gmail.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

Amber L. Simmons
Simmons Law Firm
426 Barcellus, Suite 303
Santa Maria, CA 93454
TELEPHONE: 805-329-4800

EMAIL (optional): amber@asimmonsfirm.com

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 1/9/2023 TIME: Various

PLACE: 1127 Parkland, Santa Maria, CA 93455

CIRCUMSTANCES:

See attached description of circumstances and damages.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

See attached description of circumstances and damages.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

See attached.

F. IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":
Full amount unknown at this time but exceeds the jurisdictional minimum of an unlimited civil claim.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

Cullen

SIGNATURE OF CLAIMANT OR REPRESENTATIVE

02 / 15 / 2023

DATE SIGNED

Section C. Circumstances.

Circumstances: Craig Cullen (“Craig”) and his wife own the real property and improvements located at and commonly referred to as 1127 Parkland, Santa Maria, CA 93455 (“Home”) near Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including all of Craig’s personal property in and around the Home and all landscaping and external features of the Home, were completely destroyed. The destruction was caused by a faulty drainage system; negligent water system design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including but not limited to the Home. Design, construction, maintenance and management of infrastructure, water systems, and water basin management fall under the County’s purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and directly hit the Home, causing the Home to be under four (4) feet of water in all areas. Craig, his wife, his seven (7) year old son, and the family dog were evacuated and removed from the Home by emergency personnel. The Home and all personal property in and around it belonging to Craig (as well as his wife and son) were completely destroyed. At the time of damage (1/9/2023), the Home was completely remodeled and had new construction, fixtures and furnishings that were less than one (1) year old; and Craig’s seven (7) year old son lost all of his Christmas presents.

Craig’s losses include but are not limited to total reconstruction of the Home, as it has been deemed unsafe to live in by government officials; replacement of all personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, business equipment and inventory, vehicles, fencing and landscaping destroyed at the Home. Additionally, Craig, his wife, his son, and his dog have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses, and to lose business income due to the loss of business equipment and inventory.

Craig and his family have also been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in no event exceed the jurisdictional minimum of an unlimited civil case.

Section D. General Description of Damages.

Circumstances: Craig his wife own the Home, which is located near Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including all of Craig’s personal property in and around the Home and all landscaping and external features of the Home, were completely destroyed. The destruction was caused by a faulty

drainage system; negligent water system, design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including the Home. Design, construction, maintenance and management of infrastructure, water systems, and water basin management fall under the County's purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and directly hit the Home, causing the Home to be under four (4) feet of water in all areas. Craig, his wife, his seven (7) year old son, and the family dog were evacuated and removed from the Home by emergency personnel. The Home and all personal property in and around it belonging to Craig (as well as his wife and son) were completely destroyed. At the time of damage (1/9/2023), the Home was completely remodeled and had new construction, fixtures and furnishings that were less than one (1) year old; and Craig's seven (7) year old son lost all of his Christmas presents.

Craig's losses include but are not limited to total reconstruction of the Home, as it has been deemed unsafe to live in by government officials; replacement of all personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, business equipment and inventory, vehicles, fencing and landscaping destroyed at the Home. Additionally, Craig, his wife, his son, and his dog have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses, and to lose business income due to the loss of business equipment and inventory.

Craig and his family have also been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in no event exceed the jurisdictional minimum of an unlimited civil case.

Section E. Employees.

The names of exact employees are unknown at this time but will be determined according to proof at a later date, and include but are not limited to all employees and other individuals responsible for the design, construction, maintenance and management of Union Valley Parkway in Northern Santa Barbara County; all employees and other individuals responsible for the design, construction, maintenance, management and oversight of water infrastructure systems and water basin management near Union Valley Parkway and surrounding areas in Northern Santa Barbara County.

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COUNTY OF SANTA BARBARA
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A. NAME AND ADDRESS OF THE CLAIMANT:

Nathan and April Hugh
4231 Hibiscus Court
Santa Maria, CA 93455

TELEPHONE: (805) 878-5056

EMAIL (optional): aprilhugh4homes@gmail.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

Amber L. Simmons
Simmons Law Firm
426 Barcellus, Suite 303
Santa Maria, CA 93454
TELEPHONE: 805-329-4800

EMAIL (optional): amber@asimmonslawfirm.com

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 1/9/2023 TIME: Various

PLACE: 4231 Hibiscus Court, Santa Maria, CA 93455

CIRCUMSTANCES:

See attached description of circumstances and damages.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

See attached description of circumstances and damages.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

See attached.

F IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":

Full amount unknown at this time but exceeds the jurisdictional minimum of an unlimited civil claim.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

[Signature]

SIGNATURE OF CLAIMANT OR REPRESENTATIVE

03 / 03 / 2023

DATE SIGNED

Section C. Circumstances.

April and Nathan Hugh (collectively "Hughs") own the real property and improvements located at and commonly referred to as 4231 Hibiscus Court, Santa Maria, CA 93455 ("Home"). The Home backs up to Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including significant amounts of Hughs' personal property in and around the Home, as well as landscaping and external features of the Home, were destroyed. The Home was displaced from its foundation, and extensive flooding was caused throughout the Home. The Home incurred material erosion, water damage and debris and soil coming into the Home when Union Valley Parkway (which abuts the Home) collapsed. The destruction to the Home was caused by a faulty drainage system; negligent water system design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including but not limited to the Home. Design, construction, maintenance and management of infrastructure, water systems, and water basin management fall under the County's purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and directly hit the Home, causing the Home to be displaced from its foundation, extensive structural damage to the Home, and a back wall for the Home to be destroyed, to name a few of the damages incurred. The Hughs, along with their minor daughter and family pets were evacuated and removed from the Home by emergency personnel. The Home and substantial amounts of personal property in and around it belonging to Hughs were destroyed.

Hughs' losses include but are not limited to substantial reconstruction and stabilization of the Home, as it has been deemed unsafe to live in by government officials; replacement of personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, business equipment and inventory, fencing and landscaping destroyed at the Home. Additionally, Hughs, their daughter and pets have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses from the date of injury until the Home is reconstructed and once again safe to live in. Even once Hughs can return to the Home, the Home has a negative "stigma," decreasing not only Hughs' peace of mind but also the future marketability and value of the Home after reconstruction.

Hughs and their daughter have been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in any event exceed the jurisdictional minimum of an unlimited civil case.

Section D. General Description of Damages.

Hughs own the Home, which backs up to Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including Hughs' personal property in and around the Home and landscaping and external features of the Home, were destroyed.

The Home was displaced from its foundation, and extensive flooding was caused throughout the Home. The destruction to the Home was caused by a faulty drainage system; negligent water system design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including but not limited to the Home. Design, construction, maintenance and management of infrastructure, water systems, and water basin management fall under the County's purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and directly hit the Home, causing the Home to be displaced from its foundation, extensive structural damage to the Home, and for portions of the back wall for the Home that abuts Union Valley Parkway to collapse, to name a few of the damages incurred. Hughs, along with their minor daughter and family pets, were evacuated and removed from the Home by emergency personnel. The Home and substantial amounts of personal property in and around it belonging to Hughs were destroyed.

Hughs' losses include but are not limited to, substantial reconstruction and stabilization of the Home, as it has been deemed unsafe to live in by government officials; replacement of personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, business equipment and inventory, fencing and landscaping destroyed at the Home. Hughs, their daughter and pets have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses from the date of injury until the Home is reconstructed and once again safe to live in. Even once Hughs can return to the Home, the Home has a negative "stigma," decreasing not only Hughs' peace of mind but also the future marketability and value of the Home after reconstruction.

Hughs and their daughter have also been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in any event exceed the jurisdictional minimum of an unlimited civil case.

Section E. Employees.

The names of exact employees are unknown at this time but will be determined according to proof at a later date, and include but are not limited to all employees and other individuals responsible for the design, construction, maintenance and management of Union Valley Parkway in Northern Santa Barbara County; all employees and other individuals responsible for the design, construction, maintenance, management and oversight of water infrastructure systems and water basin management near Union Valley Parkway and surrounding areas in Northern Santa Barbara County.

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MAR -9 P 1:01
COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS
BOARD CLERK OF THE BOARD TIME STAMP

A. NAME AND ADDRESS OF THE CLAIMANT:

Eric and Nancy Garcia
6855 Long Canyon Road
Santa Maria, CA 93454

TELEPHONE: 805-264-1809

EMAIL (optional): nancynotary99@gmail.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

TELEPHONE:

EMAIL (optional):

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 01-09-2023 TIME: 5:00p.m.

PLACE: 4237 Hibiscus Court and Union Valley Parkway, Santa Maria, CA 93455, Santa Barbara County

CIRCUMSTANCES: See Attachment 1:C

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

See Attachment 1:D

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

Santa Barbara County, City of Santa Maria and State of California.

F IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":
It will be an unlimited civil case.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

[Signature]
SIGNATURE OF CLAIMANT OR REPRESENTATIVE

[Signature]

3-9-23
DATE SIGNED

**ATTACHMENT 1 TO
CLAIM
COUNTY OF SANTA BARBARA**

For 4237 Hibiscus Court, Santa Maria, CA 93455

Section C. Circumstances.

Eric and Nancy Garcia (the “Garcias”) own the real property and improvements located at 4237 Hibiscus Court, Santa Maria, CA 93455 (the “Property”). The backyard of the Property backs up to Union Valley Parkway in Orcutt, CA (“Orcutt Area”) On January 9, 2023, Santa Barbara County had a rainstorm. The heavy rain provided a few inches of rain to the Orcutt Area. The heavy rain caused the water basin to overflow. The catchment basin first caved in at Franklin Road and Country Hill Road, directly across Union Valley Parkway. It then spilled onto Union Valley Parkway up against a sound barrier wall. It eroded and collapsed onto the Property. Millions of gallons of water escaped from the water, drainage system causing a river of water to violently rush through the entire Orcutt Area. As a result, the Property was flooded with at least four feet of water leaving the Property buried in sand.

The drainage system, water system, and water basin are owned by Santa Barbara County

The drainage system was designed and installed in the Orcutt Area by Santa Barbara County. The heavy rain exposed the faulty drainage system. Per the County Supervising Environmental Health Specialist Jason Johnston, the rain caused flows through the sewer system to exceed capacity, resulting in the release of sewage from the system to the street. The local health department warned that the water could increase the risk of illnesses for the area around the Property.

The county of Santa Barbara designed and installed the water basin and water system. The county of Santa Barbara constructed the water system when it built Union Valley Parkway. The county of Santa Barbara installed the water system and water basin in the Orcutt Area that provides drainage to the Property. Santa Barbara County is in charge of maintaining and managing the sewer, drainage system, water system, and water basin in the Orcutt Area.

The design, construction, maintenance and management of infrastructure, water systems, and water basin management fall under the County’s purview and jurisdiction.

Negligence

Upon information and belief, Santa Barbara County failed to properly design the water system and water basin. Upon information and belief, Santa Barbara County failed to properly install the water system and water basin. Upon information and belief, Santa Barbara County failed to maintain the water system, drainage system and water basin to prevent overflow.

Cause of damage

The negligent water system design, construction and maintenance; and improper water system and water basin management and maintenance in the Orcutt Area directly and proximately caused an excess of water to flow down Union Valley Parkway. The accumulation of water and debris directly impacted the property which damaged the foundation of the Property. It caused extensive structural damage to the Property. The back wall of the Property was destroyed. The wall has not been rebuilt by Santa Barbara County. A temporary chain link fence has been installed by Santa Barbara County. As a result of the basin's failure and overflow all of the personal property in and around the Property, including landscape and external features were completely destroyed.

Santa Barbara County ordered occupants of the homes located in the Orcutt Area to evacuate. The Property was initially red tagged by Santa Barbara County because it is unsafe to enter. The Property is now yellow tagged in order to allow for reclaiming of personal property and to enter the home to obtain estimates and begin to repair the damage to the Property. (See attached photos of the water damage on January 9, 2023 and the red tag).

Section D. General Description of Damages

Losses by Garcia's include but are not limited to reconstruction of the Property. The Property has been deemed unsafe to live in by government officials. There is major water damage to the entire inside of the Property which led to the complete gutting of the Property. There was the collapse of the existing three-tier retaining wall, and cement wall. The concrete broke and pavers were unearthed. There is major cracking of the stucco outside of the Property. The Property was buried in 6ft of sand. Left behind about 2ft feet pile of sand. The personal property in and around the Property was destroyed. The Garcias have obtained estimates from local professionals. The estimated cost to rebuild the Property, restore the landscape to its previous condition, and install the three-tier retaining wall is approximately \$454,194.64. The exact amount of the economic and non-economic damages will be determined according to proof but in any event, they will exceed the jurisdictional minimum of an unlimited civil case. (See attached photos of the water damage to the Property and copy of the estimates from professional builders).

Section E. Employees.

The names of exact employees are unknown at this time but will be determined according to proof at a later date, and include but are not limited to all employees and other individuals responsible for the design, construction, maintenance and management of Union Valley Parkway in Northern Santa Barbara County; all employees and other individuals responsible for the design, construction, maintenance, management and oversight of water infrastructure systems and water basin management near Union Valley Parkway and surrounding areas in Northern Santa Barbara County.

**CLAIM
COUNTY OF SANTA BARBARA**


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MAR 14 P 2:24
COUNTY OF SANTA BARBARA
BO. CLERK OF THE BOARD TIME STAMP



A. NAME AND ADDRESS OF THE CLAIMANT:

Cynthia Green
1143 Parkland
Santa Maria, CA 93455

TELEPHONE: (805) 878-7534

EMAIL (optional): tinalor@msn.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

Amber L. Simmons
Simmons Law Firm
426 Barcellus, Suite 303
Santa Maria, CA 93454
TELEPHONE: 805-329-4800

EMAIL (optional): amber@asimmonslawfirm.com

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 1/9/2023 TIME: Various

PLACE: 1143 Parkland, Santa Maria, CA 93455

CIRCUMSTANCES:

See attached description of circumstances and damages.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

See attached description of circumstances and damages.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

See attached.

F IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":
Full amount unknown at this time but exceeds the jurisdictional minimum of an unlimited civil claim.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

Cynthia Green

03 / 09 / 2023

SIGNATURE OF CLAIMANT OR REPRESENTATIVE

DATE SIGNED

Section C. Circumstances.

Cynthia Green (“Cynthia”) owns the real property and improvements located at and commonly referred to as 1143 Parkland, Santa Maria, CA 93455 (“Home”) near Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including Cynthia’s personal property in and around the Home and landscaping and external features of the Home, were damaged and/or destroyed. The losses were caused by a faulty drainage system; negligent water system design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including but not limited to the Home. Design, construction, maintenance and management of infrastructure and water systems, as well as water basin management fall under the County’s purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and hit the Home, causing the Home to be under water in all areas. Cynthia, her adult developmentally disabled daughter, and her daughter’s service dog were evacuated and removed from the Home by emergency personnel. Emergency personnel attempted to leave Cynthia, her daughter and the service dog on a corner, in the middle of an emergency area, and simply told them to “get an Uber” to a safe location.

The Home and personal property in and around it belonging to Cynthia, as well as her daughter, were significantly damaged and/or destroyed.

Cynthia’s losses include but are not limited to reconstruction of the Home, as it has been deemed unsafe to live in by government officials; replacement of personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, specialized service equipment for Cynthia’s developmentally disabled daughter, including but not limited to a specialized computer designed and specifically set up for her daughter’s use, as well as a vehicle, fencing and landscaping destroyed at the Home.

Additionally, Cynthia, her daughter and her daughter’s service dog have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses..

Cynthia and her daughter have also been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas. Cynthia’s daughter’s abilities have deteriorated under the stresses of these events and her perception that Cynthia could not “save her” during the flood and emergency evacuation process.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in any event exceed the jurisdictional minimum of an unlimited civil case.

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Section D. General Description of Damages.

Cynthia owns the Home, which is located near Union Valley Parkway in Orcutt, California (Northern Santa Barbara County). On January 9, 2023, the Home, including Cynthia's personal property in and around the Home and all landscaping and external features of the Home, were damaged and/or destroyed. The losses were caused by a faulty drainage system; negligent water system design, construction and maintenance; and improper water system and water basin management at Union Valley Parkway and surrounding areas, including but not limited to the Home. Design, construction, maintenance and management of infrastructure and water systems, as well as water basin management fall under the County's purview and jurisdiction.

The above-described water system maintenance, design and management issues directly and proximately caused an excess of water to flow down Union Valley Parkway, accumulate, and hit the Home, causing the Home to be under water in all areas. Cynthia, her adult developmentally disabled daughter, and her daughter's service dog were evacuated and removed from the Home by emergency personnel. Emergency personnel attempted to leave Cynthia, her daughter and the service dog on a corner, in the middle of an emergency area, and simply told them to "get an Uber" to a safe location.

The Home and personal property in and around it belonging to Cynthia, as well as her daughter, were significantly damaged and/or destroyed.

Cynthia's losses include but are not limited to reconstruction of the Home, as it has been deemed unsafe to live in by government officials; replacement of personal property, including but not limited to jewelry, clothing, furnishings, electronics, artwork, tools, specialized service equipment for Cynthia's developmentally disabled daughter, including but not limited to a specialized computer designed and specifically set up for her daughter's use, as well as a vehicle, fencing and landscaping destroyed at the Home.

Additionally, Cynthia, her daughter and her daughter's service dog have been displaced and cannot yet safely return to the Home, causing them to incur additional rental and storage expenses.

Cynthia and her daughter have also been traumatized by these events and have, and continue to, endure mental suffering and emotional distress, including but not limited to anxiety, depression, post-traumatic stress disorder, loss of sleep, nausea, and other forms of distress due to being evacuated from the Home and having the Home and all belongings in it, including irreplaceable family heirlooms, completely destroyed less than three (3) weeks after Christmas. Cynthia's daughter's abilities have deteriorated under the stresses of these events and her perception that Cynthia was unable to "save her" during the flood and emergency evacuation process.

The exact amount of all of these economic and noneconomic damages will be determined according to proof but in any event, exceed the jurisdictional minimum of an unlimited civil case.

///

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Bill [Signature]
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2023 MAR 17 P 1:08

CLERK OF THE BOARD, TIME STAMP

A. NAME AND ADDRESS OF THE CLAIMANT:

The Whiting Family Trust
William & Antoinette Whiting
3570 Offshore Dr.
Lake Havasu City, AZ 86406

TELEPHONE: 562--843-3546

EMAIL (optional): Antoinettewhiting@gmail.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

TELEPHONE:

EMAIL (optional):

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 1/9/2023 TIME: 5:00pm

PLACE: 1135 Parkland Dr.
Santa Maria, CA 93455

CIRCUMSTANCES:

During a rain event, water that had built up in a retention pond to the southeast of the east Union Valley Parkway and South Bradley Road intersection breached through the sloped grade and retaining wall on the north side of the pond. The water then crossed East Union Valley Parkway and breached an additional sloped grade and fence spilling onto Hibiscus Court. The water then travelled north on Hibiscus Court, emptying onto Parkland Drive and flooded our residence. Infrastructure failure, lack of maintenance and possible poor design caused this incident.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

Damage to personal property, including remediation, drying, mold, landscaping, block wall, fencing, walls, insulation, floors, tile, paint & stucco, lower cabinetry, paint, Appliances, Loss of rents, inverse-condemnation.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

Do not know anyone by name

F. IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":
(Unlimited Civil Case)

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

Antoinette L. Whiting
SIGNATURE OF CLAIMANT OR REPRESENTATIVE

02/20/2023
DATE SIGNED

**CLAIM
COUNTY OF SANTA BARBARA**

PLEASE RETURN ORIGINAL AND ONE COPY TO:

COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS
105 EAST ANAPAMU STREET, SUITE 407
SANTA BARBARA, CA 93101

* READ THE INSTRUCTIONS ON THE REVERSE SIDE BEFORE COMPLETING *
* IF ADDITIONAL SPACE IS NEEDED, USE SEPARATE PIECES OF PAPER *

Bill Noy
RECEIVED BY (DEPUTY CLERK)

Personal Delivery
 Mail
 Other _____



RECEIVED
2023 MAR 21 P 2:00

CLERK OF THE BOARD TIME STAMP

A. NAME AND ADDRESS OF THE CLAIMANT:

Jack & Linda Brey
1159 Parkland Dr
Santa Maria, CA, 93455

TELEPHONE: (805) 598-9397

EMAIL (optional): jackbrey@verizon.net

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

1159 Parkland Dr
Santa Maria, CA, 93455

TELEPHONE: (805) 598-9397

EMAIL (optional): jackbrey@verizon.net

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 01/09/2023 TIME: 1701

PLACE: 1159 Parkland Dr., Santa Maria, CA 93455

CIRCUMSTANCES:

Inadequate maintenance and infrastructure failure of water basins which led to the collapse of the west bound lane of Union Valley Parkway at the corner of Bradley. This caused a debris flow down Hibiscus Ct and down Parkland Dr. which entered our house at 1159 Parkland Dr and caused a debris flow throughout our home and garage.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

1. Clean-up and sanitizing of house due to debris flow into the house and garage. This includes the demolition of all wallboard 2 ft high, removal of insulation, removal of flooring, removal of cabinets, doors, drying, and sanitation of house and garage.
2. Rebuilding of the house interior and replacement of damaged furnishings.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

F IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES ___ NO X

IF "YES": STATE THE AMOUNT CLAIMED, AND THE BASIS OF COMPUTATION:

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":

Not a "limited civil case" at this time.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

Jack C. Brey
SIGNATURE OF CLAIMANT OR REPRESENTATIVE

3/17/2023
DATE SIGNED

CLAIM
COUNTY OF SANTA BARBARA
PLEASE RETURN ORIGINAL SIGNED COPY TO:

COUNTY OF SANTA BARBARA
CLERK OF THE BOARD OF SUPERVISORS
105 EAST ANAPAMU STREET, SUITE 407
SANTA BARBARA, CA 93101

- * READ THE INSTRUCTIONS ON THE REVERSE SIDE BEFORE COMPLETING *
- * IF ADDITIONAL SPACE IS NEEDED, USE SEPARATE PIECES OF PAPER *
- * PLEASE RETAIN A COPY FOR YOUR RECORDS*

Bud Ho
RECEIVED BY (DEPUTY CLERK)

- Personal Delivery
- Mail
- Other _____



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CLERK OF THE BOARD TIME STAMP

A. NAME AND ADDRESS OF THE CLAIMANT:

Philip Sherry
4225 Hibiscus Ct
Orcutt, Ca 93455

TELEPHONE: 805-934-1867

EMAIL (optional): Email: sherryphilip75@gmail.com

B. ADDRESS TO WHICH THE PERSON PRESENTING THE CLAIM DESIRES NOTICES TO BE SENT:

Philip Sherry
4225 Hibiscus Ct
Orcutt, Ca 93455

TELEPHONE: 805-934-1867

EMAIL (optional): Sherryphilip75@gmail.com

C. DATE, PLACE, AND OTHER CIRCUMSTANCES OF THE OCCURRENCE OR TRANSACTION WHICH GAVE RISE TO THE CLAIM:

DATE: 1-9-2023 TIME: Approximately 5 p.m.

PLACE: 4225 Hibiscus Court

CIRCUMSTANCES:

1/9 2023 Time approximately 5 pm. Place 4225 Hibiscus Ct, Orcutt, Ca
Heavy rains, causing flooding, resulting in Sinkhole on Union Valley Parkway.
The force of water rushing down Hibiscus Ct. with debris from downed fences, landscaping
Mail boxes etc. Water and sand up near half way on most driveways.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

Photos enclosed show how much damage was done to our landscape, most of the rock was washed away. Our 4226 Hibiscus Ct. rental property, also had landscape damage, , much rock was washed away.

E. NAME(S) OF THE PUBLIC EMPLOYEE(S) CAUSING THE INJURY, DAMAGE, OR LOSS:

F IS THE AMOUNT CURRENTLY CLAIMED LESS THAN \$10,000? YES NO

IF "YES": STATE THE AMOUNT CLAIMED. AND THE BASIS OF COMPUTATION:

Total for both properties 4225 Hibiscus Ct \$ 3500.00 --4226 Hibiscus Ct. \$ 1800.00
Totaling \$ 5300.00

IF "NO": DO NOT STATE A DOLLAR AMOUNT, AND INSTEAD STATE WHETHER THE CLAIM WOULD BE A "LIMITED CIVIL CASE":

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA
THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT

Philip Sherry
SIGNATURE OF CLAIMANT OR REPRESENTATIVE

1-7-2023
DATE SIGNED