

# THE SILVERSTEIN LAW FIRM

*A Professional Corporation*

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February 8, 2018

**VIA FACSIMILE (805) 568-2249**  
**AND EMAIL**

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**rmorgan@co.santa-barbara.ca.us**

Santa Barbara County Flood Control &  
Conservation District Bd. of Directors  
c/o Clerk of the Board  
105 East Anapamu Street, Fourth Fl.  
Santa Barbara, CA 93101

**VIA FACSIMILE (805) 568-2982**  
**AND U.S. MAIL**

Michael Ghizzoni, Esq.

County Counsel

Office of the Santa Barbara

County Counsel

105 East Anapamu Street, Suite 201

Santa Barbara, CA 93101

Re: Proposed Resolution of Necessity and other issues related to  
324 De La Vina Street, Santa Barbara

Dear Mr. Morgantini:

We are in receipt of your email of today's date, February 8, 2018, in which you seem to indicate that you or the County have already responded to all of our Public Records Act requests. This appears to be in response to my letter of last night, February 7, 2018.

We respectfully disagree with your apparent contention that all of our Public Records Act requests have been responded to or otherwise completed. This is because your own emailed letter indicates that it is in reference solely to Mrs. Mirtorabi's December 20, 2017 CPRA requests.

However, the 13 separate requests contained in my January 19, 2018 letter to the County were distinct from, in addition to, and not duplicative of Mrs. Mirtorabi's December 20, 2017 CPRA requests. Accordingly, your attempted dismissal of my January 19, 2018 requests as having already been responded to is incorrect and extremely prejudicial to my client's rights.

The County continues to violate the CPRA, including Government Code §§ 6253 and 6255. We reserve all rights to file a petition for writ of mandate against the County,

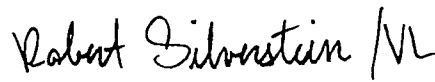
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Richard Morgantini  
Michael Ghizzoni, Esq.  
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including to seek an award of our attorney fees and costs pursuant to Government Code § 6259(d).

In the meantime, the County continues to hamper my client's due process and other rights related to the threatened resolution of necessity and taking of property under the power of eminent domain. We demand that the County actually and carefully examine my January 19, 2018 requests and immediately contact me regarding the County producing all documents responsive to those unique requests.

As with my February 7, 2018 letter, please ensure that this letter is distributed to the Board of Directors in advance of any continued hearing dates for any item related to my client's property. And for all the reasons previously stated, we again request that the February 27, 2018 hearing date be continued. I look forward to County Counsel's and your prompt response. Thank you.

Very truly yours,



ROBERT P. SILVERSTEIN  
FOR  
THE SILVERSTEIN LAW FIRM, APC

RPS:vl