

Central Valley Regional Water Quality Control Board

13 September 2016

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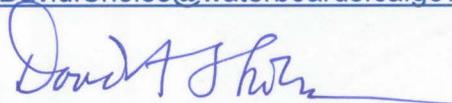
**ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0513, FOR JIM & VERA KURNOSOFF, AS INDIVIDUALS AND IN THEIR REPRESENTATIVE CAPACITY AS TRUSTEES FOR THE J & V REVOCABLE TRUST, FRESNO COUNTY**

Pursuant to the Hearing Procedure for the above referenced matter, please find enclosed a list of witnesses the Prosecution Team intends to call at the hearing and a list of evidence with attached exhibits. The Evidence List consists of documents already in the public files of the Central Valley Regional Water Quality Control Board, some of which are being submitted by reference in accordance with the California Code of Regulations, title 23, section 648.3. The Prosecution Team's Legal and Technical Analysis is also enclosed.

The Prosecution Team has added Eric Warren to the Prosecution Team and witness list to provide additional testimony regarding information about the facility, landowner outreach and the penalty methodology.

If you have any questions or comments regarding the Administrative Civil Liability Complaint or the enclosed documents, please contact me by telephone at (559) 445-6279 or by email at

[David.Sholes@waterboards.ca.gov](mailto:David.Sholes@waterboards.ca.gov)



DAVID A. SHOLES  
Senior Engineering Geologist

Enclosures: Prosecution Team's Legal & Technical Analysis  
Prosecution Team's Witness List  
Prosecution Team's Evidence List and Exhibits

cc's on next page

cc via email: Adam Laputz, Central Valley Water Board, Rancho Cordova  
Andrew Deeringer, Office of Chief Counsel, SWRCB, Sacramento  
Clay Rodgers, Central Valley Water Board, Fresno  
Doug Patteson, Central Valley Water Board, Fresno  
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