

1 Robert P. Goe - State Bar No. 137019
2 Marc C. Forsythe - State Bar No. 153854
3 Elizabeth A. LaRocque – State Bar No. 219977
4 **GOE & FORSYTHE, LLP**
5 18101 Von Karman Avenue, Suite 510
6 Irvine, CA 92612
7 rgoe@goeforlaw.com
8 mforsythe@goeforlaw.com
9 elarocque@goeforlaw.com

6 Telephone: (949) 798-2460
7 Facsimile: (949) 955-9437

8 Attorneys for Petitioners, Linda K. England and Robert D. Adams

9 **CALIFORNIA WATER BOARDS**
10 **SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD**

11
12 In re:
13 IDEAL UNIFORM RENTAL SERVICE

Cleanup and Abatement Order No.
R8-2012-09

**PETITION FOR REVIEW OF ORDER
PURSUANT TO CALIFORNIA WATER
CODE SECTION 13320 AND
CALIFORNIA CODE OF
REGULATIONS SECTION 2050**

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20 **TO THE STATE WATER RESOURCES CONTROL BOARD**, Linda K. England
21 and Robert D. Adams hereby request that the State Water Resources Control Board review the
22 findings in the Cleanup and Abatement Order No. R8-2012-019 Regarding the Former Ideal
23 Uniform Rental Service. This Petition is brought in accordance with California Water Code
24 Section 13320 and California Code of Regulations Section 2050.

25 **I. BASIS FOR PETITION AND STATEMENT OF ISSUE**

26 On March 15, 2012 the Santa Ana Regional Water Quality Control Board (the “Water
27 Board”) submitted a Cleanup and Abatement Order No. R8-2012-019 Regarding the Former
28 Ideal Uniform Rental Service (the “Order”). Pursuant to California Code of Regulations Section

1 2050(a)(2), a true and correct copy of the Order is attached hereto as **Exhibit "1"**. Robert D.
2 Adams ("Adams") and Linda K. England ("England", collectively with Adams, the
3 "Petitioners") hereby petition the Water Board to review the proposed findings (which are not
4 supported by any documentary evidence and are not alleged under penalty of perjury) that
5 attempt to hold Petitioners personally liable for the acts of a business (Ideal Uniform Rental
6 Services ("Ideal")), which Petitioners never participated in or held an interest when the
7 environmental violations occurred. Petitioners have never had a direct interest in the real
8 property located at 13811 A Better Way, Garden Grove, County of Orange, CA ("Property").
9 Even if admissible evidence is eventually presented, Petitioners assert the Water Board has no
10 basis for holding Petitioners individually liable for any alleged environmental violation
11 committed by Ideal. Petitioners request the Water Board revise the Order, and hold that
12 Petitioners are not individually financially liable for any environmental violation committed by
13 Ideal. Petitioners were unable to raise objections as there was no hearing on the matter. As
14 stated, the Order was issued on March 15, 2012. Petitioners' counsel outlined various arguments
15 regarding alleged alter ego liability, but no response was provided until the Order was issued.
16 Pursuant to California Code of Regulations Section 2050(a)(8), the Petition will be served on the
17 appropriate regional board and to the discharger.

18 **II. STATEMENT OF POSITION**

19 1. Ideal's business that was run at the contaminated property (the "Site") was
20 operated by the father of Ms. England and Mr. Adams. Neither Ms. England nor Mr. Adams had
21 any involvement with the operation of such business.

22 2. The father passed in June 2007.

23 3. Ideal Uniform stopped operating at the site in May 2006.

24 4. The washers that allegedly caused the contamination were replaced in 1986.

25 Subsequent to the replacement of the washers, Ms. England and Mr. Adams each obtained a
26 24.5% ownership interest in Ideal Uniform and the father held the remaining 51%. Subsequent
27 to the father's passing, the father's 51% was distributed to Ms. England and Mr. Adams.
28

1 **III. ARGUMENT**

2 The Water Board offered no factual or legal argument to support a finding that
3 Petitioners should be individually liable for acts or violations committed over two decades ago
4 by Ideal. As noted in the Order, the “dry cleaning plant equipment was removed in 1985.”
5 Order, ¶ 4. Petitioners were not corporate members of Ideal at the time the corporation was
6 operational and the alleged violations were committed.

7 **A. Petitioners Did Not Violate The Water Code Cited In The Order.**

8 California Water Code Section 13304 states:

9 “Any person who has discharged or discharges waste into the waters
10 of this state in violation of any waste discharge requirement or other
11 order or prohibition issued by a regional board or the state board, or
12 who has caused or permitted, causes or permits, or threatens to cause
13 or permit any waste to be discharged or deposited where it is, or
14 probably will be, discharged into the waters of the state and creates,
15 or threatens to create, a condition of pollution or nuisance, shall upon
16 order of the regional board, clean up the waste or abate the effects of
17 the waste, or, in the case of threatened pollution or nuisance, take
18 other necessary remedial action, including, but not limited to,
19 overseeing cleanup and abatement efforts.”

20 (emphasis added). See also, TWC Storage, LLC v. State Water Resources Control Board, 185
21 Cal.App.4th 291, 297 (2010) (explaining “Water Code section 13304, subdivision (a) provides
22 that a person is responsible for cleanup and abatement if the person ‘causes or permits’ a
23 discharge that ‘creates, or threatens to create, a condition of pollution or nuisance.’”)

24 Petitioners did not discharge any waste into any water source, nor have they caused or
25 permitted any waste to be discharged into any water source. At the time of the alleged
26 violations, Ideal’s dry cleaning business was being operated by Petitioner’s father. See Order, ¶
27 4. The plain language of the statute requires an act or omission on part of the party responsible
28 for the violation. It is impossible for Petitioners to discharge or cause any discharge into a water
source as they were not corporate officers or shareholders of Ideal at the time any alleged
contamination occurred. The Water Board presented no evidence that Petitioners engaged in any
conduct that resulted in pollution. In fact the only evidence offered by the Water Board is that
chemicals were released into groundwater by Ideal. The Order does not state that Petitioners

1 violated any Water Code statute. If any party is responsible under Section 13304, Ideal is
2 responsible, not Petitioners, and thus they should not and cannot legally be financially liable.

3 Even if alleged, there is no evidence or basis in law that Petitioners should be personally
4 liable for any violation made by Ideal prior to their time as corporate officers. Water Code
5 Section 13305(f) states “the owner of the property...is liable for all reasonable costs incurred...”
6 The owner of the Property is Ideal, not Petitioners, and there is no evidence that Petitioners were
7 ever involved in the operation of Ideal’s dry cleaning business. The Order does not cite to any
8 statute or law that would transmute liability from Ideal to Petitioners. As discussed below, the
9 Clean Water Act incorporates a statute that holds responsible corporate officers personally liable
10 for certain environmental violations. However, the Water Board has not cited to a similar statute
11 that would allow the Water Board to pierce the corporate veil of Ideal.

12 **B. Should the Responsible Corporate Officer Doctrine Apply, Petitioners Would**
13 **Not Be Personally Liable for Ideal’s Alleged Violations.**

14 No discussion of the Water Code addresses piercing the corporate veil and holding
15 individual shareholders or officers liable for the violations of the corporation. For this reason,
16 Petitioners discussed with Ms. Carrigan and Ms. Sturdevant and then sent them an email dated
17 January 31, 2012, with authorities supporting Petitioners position that traditional alter ego
18 principles did not support a finding of individual liability against Petitioners. By way of analogy,
19 the Clean Water Act features a provision by which the government can fix liability to a
20 shareholder of a corporation. See 33 U.S.C. 1319(c)(4). Pursuant to the Responsible Corporate
21 Officer Doctrine, “[t]hree essential elements must be satisfied before liability will be imposed
22 upon a corporate officer...(1) the individual must be in a position of responsibility which allows
23 the person to influence corporate policies or activities; (2) there must be a nexus between the
24 individual's position and the violation in question such that the individual could have influenced
25 the corporate actions which constituted the violations; and (3) the individual's actions or
26 inactions facilitated the violations.” People v. Roscoe, 169 Cal.App.4th 829, 839
27 (2008)(applying the same analysis as under the Clean Water Act); see also, United States v.
28 Iverson, 162 F.3d 1015 (9th Cir. 1998)(applying same factors under the Clean Water Act)..

1 Here, none of the elements are present. While Petitioners might now be in a position of
2 responsibility to influence corporate policies or activities, they were not in such a position at the
3 time Ideal committed any alleged violations as these occurred over three decades ago. See
4 Order, ¶ 4. The second factor clearly favors Petitioners' non-liability. There is no nexus
5 between any alleged violation by Ideal and the position held by Petitioners. The Order clearly
6 states that tetrachloroethene ("PCE") was allegedly discharged by the dry cleaning plant from
7 1969-to the mid-1980s. See Order, ¶ 4. Petitioners were not shareholders or corporate officers
8 of Ideal at this time, and thus were not in a position to allow or prevent any improper discharge
9 into water sources. Finally, in regard to the final factor, Petitioners' actions or inactions did not
10 facilitate any violation. The Water Board presented no evidence that Petitioners were members
11 of Ideal's corporate structure or were in any way involved with Ideal's business operations at the
12 time of the alleged violations. Moreover, the Order does not state any recent violations that have
13 occurred during the time Petitioners have been corporate officers. Consequently, even if
14 applicable, there is no evidence that any of the factors favor holding Petitioners financially
15 responsible for any alleged violations committed by Ideal.

16 **IV. CONCLUSION**

17 Petitioners do not assert Ideal is not liable for any wrongdoing. Petitioners request that
18 the Water Board eliminate any personal and/or individual financial liability assessed to
19 Petitioners. There is no evidence supporting the Water Board's findings that Petitioners should
20 be liable in place of Ideal. Ideal committed any alleged violation. The Order does not cite to any
21 California law that would allow the Water Board to place financial responsibility on Petitioners
22 in lieu of or jointly with Ideal.

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Therefore, Petitioners respectfully submit this Petition for review of all issues set forth hereinabove.

Dated: April 13, 2012

Respectfully submitted by:

GOE & FORSYTHE, LLP

By: 

Marc C. Forsythe
Attorneys for Petitioners,
Linda K. England and
Robert D. Adams

EXHIBIT 1

EXHIBIT 1

California Regional Water Quality Control Board
Santa Ana Region

Cleanup and Abatement Order No. R8-2012-019

For

Ideal Uniform Rental Service

And

Mr. Robert D. Adams, Vice President, Ideal Uniform Rental Service

And

Ms. Linda K. England, President, Ideal Uniform Rental Service

And

The Colleen R. Green Trust

Regarding Property Located At

13811 A Better Way

City of Garden Grove

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Regional Board), finds that:

1. The Ideal Uniform Rental Service (hereinafter IURS) formerly operated at 13811 A Better Way, Garden Grove, Orange County (hereinafter the property). The location of the property is shown on Attachment "A", which is hereby made part of this order.
2. The property consists of three separate parcels: Assessor's Parcel Number (APN) 100-592-01, APN 100-591-27-27, and APN 100-591-27-27, in the City of Garden Grove, County of Orange, State of California. The complete legal description of the property is shown in Attachment "B", which is hereby made part of this order.
3. Records from the Orange County Recorder's Office indicate that the property has been owned by the Colleen R. Green Trust since the 1930s.
4. In 1969, IURS leased the property from the Colleen R. Green Trust. From 1969 to the mid-1980s, IURS operated a dry cleaning plant as part of an industrial laundry service on the property. In addition to dry cleaning, services also included washing of carpet floor mats and uniforms, and renting uniforms. The dry cleaning plant used perchloroethylene, also known as tetrachloroethene (PCE), as a cleaning solvent. The dry cleaning plant equipment was removed in 1985.
5. In a letter dated December 18, 2006, Charles F. Timms, Jr., representing IURS, notified Regional Board staff that PCE had been detected in the groundwater at the property. In the letter, Mr. Timms indicated that IURS had ceased operations at the property in the mid-1980s, but was still leasing the property from the Colleen R. Green Trust. The letter requested oversight of environmental activities by the appropriate agency. Enclosed with the letter was a Supplemental Site Assessment, dated December 15, 2006, which had been prepared by Alaska Petroleum Environmental Engineering, Inc.
6. The 2006 Supplemental Site Assessment indicated that chlorinated solvents, principally PCE

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

and trichloroethylene (TCE), had been detected in the soil and groundwater at the property. The maximum concentrations of PCE and TCE in the soil samples collected at the property were 9,780 milligrams per kilogram (mg/kg) and 412 mg/kg, respectively. The soil samples with the highest concentrations were collected in the former IURS three-stage clarifier, dry cleaning machine, and chemical storage areas. PCE, TCE, 1,2-*cis*-dichloroethene, and vinyl chloride were detected in groundwater grab samples at maximum concentrations of 2,020 micrograms per liter ($\mu\text{g/L}$), 5,200 $\mu\text{g/L}$, 760 $\mu\text{g/L}$ and 3.9 $\mu\text{g/L}$, respectively. Groundwater is present beneath the property at a depth of approximately 13 feet below ground surface.

7. The Executive Officer of the Regional Board (Executive Officer) sent a letter to Mr. Robert D. Adams of IURS on January 24, 2007, requesting that Mr. Adams enroll in the Regional Board's Oversight Cost Reimbursement Program. In response, an acknowledgement was received by Regional Board staff, with the "responsible party" signature of Mr. Robert D. Adams, Vice President of IURS, and dated February 5, 2007.
8. Between November 2006 and December 2007, four investigations were conducted at the property, in order to more fully delineate the extent of contaminants present in the soil and groundwater as a result of past discharges of waste at the property. Groundwater monitoring and reporting commenced in the first quarter of 2008, initially on a monthly schedule, then on a quarterly schedule. Additional monitoring wells were installed in order to further delineate the off-site groundwater plume.
9. With Regional Board staff's concurrence, an Interim Remedial Action to facilitate remediation of subsurface impacted soil and groundwater was implemented at the property in 2008. The remedial system consisted of soil vapor extraction coupled with air sparging, using two vapor extraction wells and two air sparge wells. The system was operated from February 2008 to February 2009. Groundwater monitoring and reporting continued on a quarterly basis until the first quarter of 2010.
10. A "Request for Soil Closure – Revised" was submitted to Regional Board staff by Environmental Audit, Inc., on behalf of IURS, on March 2, 2009. The request included data from confirmation soil sampling, and stated that ozone injection technology would be utilized to address the remaining impacts to groundwater at the property.
11. Based on the data from confirmation soil sampling, the Executive Officer issued a letter of concurrence, which included a "no further action" (NFA) determination for soil at the property, on May 7, 2009. The NFA letter specified that groundwater remediation would be necessary at the property.
12. Beginning in mid-June 2009, a 60-day pilot test of *in situ* chemical oxidation of source area groundwater was conducted utilizing injection of ozone and hydrogen peroxide solution into groundwater monitoring wells. Following completion of the pilot study, additional monitoring wells were installed, and implementation of the *in situ* remedy continued.

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

13. On April 1, 2010, Regional Board staff was informed by Mr. Adams that, owing to restrictions in their lease, they could no longer afford to continue with groundwater assessment and remediation activities at IURS. Throughout April 2010, Regional Board staff engaged in numerous conversations with Mr. Adams, his attorney Charles Timms, Mr. Robert Green and Mr. Mark Green, Ms. Danielle Wakefield, attorney for Marie Green (representing the Colleen R. Green Trust), and explained that the groundwater assessment and remediation needed to continue. In spite of these efforts, the groundwater remediation system and all equipment and associated piping were removed from the IURS site on April 30, 2010, without concurrence from Regional Board staff.
14. In May 2010, Mr. Adams contacted Regional Board staff and requested a meeting. Accordingly, a meeting was scheduled for June 2, 2010. Mr. Adams subsequently requested that the meeting be postponed and rescheduled on two separate occasions (May 28, 2010 and July 14, 2010); both times stating that his new consultant, Mr. Tom Bois, required additional time to evaluate the financial and environmental status of the property. On September 27, 2010, Mr. Adams informed Regional Board staff that he had dismissed Mr. Bois, and would rehire a prior consultant. This resulted in a further delay by IURS in addressing the groundwater contamination at the property.
15. In October 2010, Regional Board staff hosted a meeting with Mr. Adams, Ms. Linda K. England (President of IURS), and Mr. Rick Caporale of Caporale Consultants, Inc. (CCI), to discuss the status of the groundwater monitoring and remediation at the property. Mr. Adams and Ms. England agreed that CCI would perform groundwater monitoring in November 2010, and CCI subsequently submitted a report of the monitoring results in January 2011. The monitoring results indicated that significant concentrations of volatile organic compounds (VOCs) were still present in the groundwater at, and downgradient of, the property.
16. In a letter dated April 6, 2011, Regional Board staff requested that IURS submit a work plan by June 8, 2011 proposing an additional investigation to delineate the offsite lateral and vertical extent of the groundwater contamination, and to propose and implement a remedial strategy. In response, Mr. Adams and Ms. England requested a postponement of the off-site investigation, in order to search for historical insurance coverage, and to evaluate the possibility of implementing on-site groundwater remediation. Regional Board staff responded on May 31, 2011, and emphasized the need for the on- and off-site remediation. Regional Board staff further requested that IURS submit a feasibility study and interim remediation proposal by the June 8, 2011 deadline, but allowed a temporary postponement of the off-site investigation pending the results of the historical insurance coverage search. Regional Board staff further requested that IURS resume groundwater monitoring of the on- and off-site wells.
17. IURS requested and received two additional extensions of the June 8, 2011 deadline, in order to allow CCI to prepare a comprehensive scope of work. Regional Board staff received a work plan from CCI on September 23, 2011, proposing to conduct the investigation.

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

18. Regional Board staff met with CCI and discussed the need for modifications to the proposed scope of work and the project schedule, and circulation of a Fact Sheet to the owners and occupants of the property and the downgradient property. In a letter dated October 13, 2011, Regional Board staff requested the submittal of a revised work plan and a draft Fact Sheet by October 31, 2011. The documents were not submitted.
19. On December 7, 2011, Mr. Caporale informed Regional Board staff that Mr. Adams had terminated CCI's services relating to the property.
20. After numerous attempts to contact Mr. Adams and Ms. England in December 2011, Regional Board staff sent a letter to Mr. Adams on January 3, 2012, requesting that he and Ms. England attend a meeting with Regional Board staff and Mr. Robert Green, representing the Colleen R. Green Trust. The purpose of the meeting, scheduled for January 18, 2012, was to discuss the status of the proposed scope of work for further characterization of contamination at, and downgradient of, the property.
21. An attorney representing IURS contacted Regional Board staff on January 9, 2012, stating that Mr. Adams would not attend the meeting, and that IURS could not conduct groundwater investigation and remediation, owing to financial hardship.
22. The results from the last comprehensive groundwater monitoring that was performed at the property (fourth quarter 2010) indicate that the concentrations of PCE were as high as 11,300 µg/L and the diffuse VOC plume continued to migrate off the property unabated. PCE and TCE concentrations in groundwater underlying the adjacent downgradient property, owned by the City of Garden Grove, were reported at 4,610 µg/L and 4,960 µg/L, respectively.
23. Because of the high concentrations of PCE and TCE in groundwater beneath the property and downgradient of the property, it will be necessary to conduct a human health risk assessment to evaluate the potential impacts to workers and occupants of the buildings as a result of migration of VOCs from the shallow groundwater into the indoor air, in areas overlying the plume.
24. The subject site overlies the Orange County Groundwater Management Zone, the beneficial uses of which include:
 - a. Municipal and domestic supply,
 - b. Agricultural supply,
 - c. Industrial service supply, and
 - d. Industrial process supply.
25. Past operations at the property by IURS, and decisions regarding environmental compliance made by responsible corporate officers Robert D. Adams and Linda K. England, have caused or permitted wastes to be discharged into waters of the State and are creating, have created, or are threatening to create, a condition of nuisance or pollution. Therefore, it is appropriate

to require IURS, Robert D. Adams and Linda K. England, primarily, and the Colleen R. Green Trust, secondarily, to conduct further investigation pursuant to California Water Code (CWC) Section 13267, and to cleanup such waste and abate the effects thereof, or take other appropriate remedial action pursuant to CWC Section 13304.

26. CWC Section 13304 allows the Regional Board to recover reasonable expenses from the responsible parties for overseeing cleanup of illegal discharges, contaminated properties, and other unregulated releases adversely affecting the state's waters. It is the Regional Board's intent to recover such costs for regulatory oversight work conducted in accordance with this order.
27. This action is being taken by a regulatory agency to enforce a water quality law. Such action is exempt from the provisions of the California Environmental Quality Act (Public Resources Codes, Section 21100 et seq.) in accordance with section 15321, Chapter 3, Title 14, California Administrative Code.

IT IS HEREBY ORDERED that, pursuant to Sections 13267 and 13304, Division 7, of the CWC, Ideal Uniform Rental Service, Robert D. Adams and Linda England shall submit technical and monitoring reports and cleanup the waste or abate the effects of the waste that has been, or probably will be, discharged into waters of the State, in accordance with the following tasks:

1. Immediately resume the groundwater monitoring program. For the following quarterly groundwater monitoring periods, submit the monitoring reports by the specified due date:

<u>Groundwater Monitoring Period</u>	<u>Report Due Date</u>
January to March	April 15
April to June	July 15
July to September	October 15
October to December	January 15

This schedule may be modified, with the approval of the Executive Officer.

2. Submit a work plan and proposed schedule, within 45 days following adoption of this order, for conducting:
 - a. a groundwater investigation to fully delineate the lateral and vertical boundaries of the groundwater contaminant plume; and
 - b. a human health risk assessment to evaluate the potential risk to occupants of the buildings from migration of VOCs into the indoor air in areas overlying the plume (both on the property and off the property).

The work plan shall be subject to the approval of the Executive Officer.

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

3. Conduct all field work necessary to define the extent of the groundwater contaminant plume, as directed by the Executive Officer, until the extent of the plume is fully delineated.
4. Based upon the results from items 1, 2 and 3 (above), submit a feasibility study and remedial action plan (FS/RAP), with a proposed implementation schedule, for remediation of the groundwater contamination and protection of human health. The FS/RAP and schedule shall be subject to the approval of the Executive Officer.
5. Conduct the necessary remediation activities as approved by the Executive Officer, and submit monthly progress reports to the Executive Officer by the last calendar day of each month.
6. Implement any necessary maintenance, improvements and repairs to the remediation system(s), as directed by the Executive Officer.
7. In the event that Ideal Uniform Rental Service, Robert D. Adams and Linda K. England do not comply with this order, the Colleen R. Green Trust shall comply with this order after the trustee of the Colleen R. Green Trust is notified in writing by the Executive Officer to do so.
8. All references to the Executive Officer in this Order shall include his delegate.

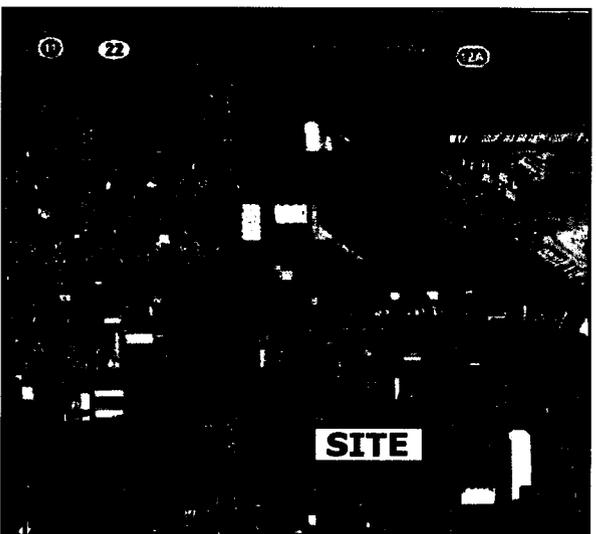
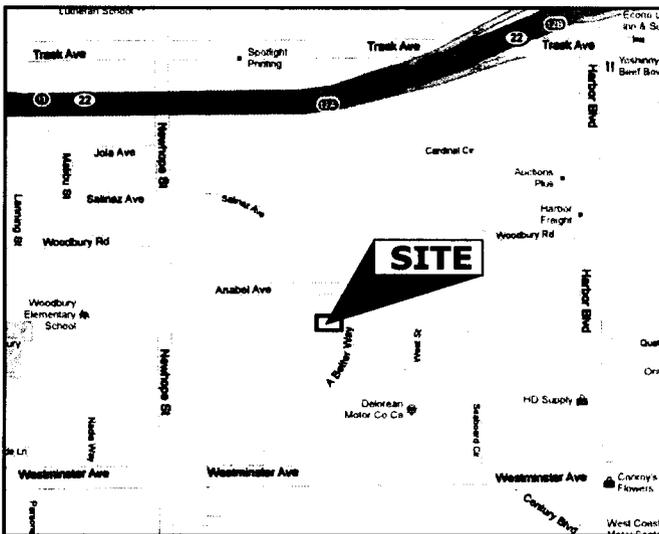
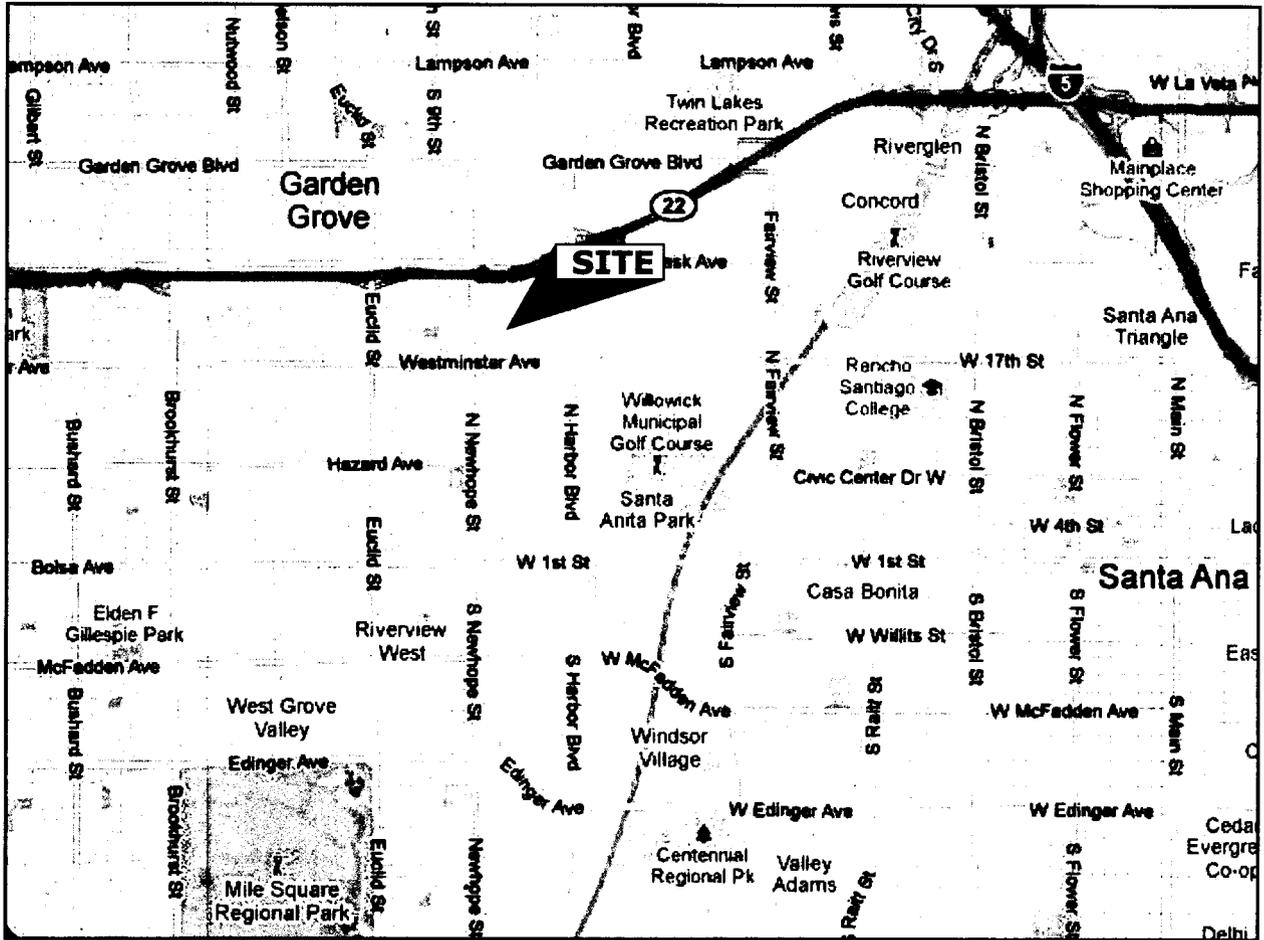
If, in the opinion of the Executive Officer, this order is not complied with in a reasonable and timely manner, Ideal Uniform Rental Service, Robert D. Adams, Linda K. England and/or the Colleen R. Green Trust may be subject to the imposition of civil liability or referral to the Attorney General for imposition of judicial liability, as provided by law.

3/15/12
Date

Robert L. Holub
Robert L. Holub
Division Chief

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

Attachment A
Property Location



No Scale

Reference: 2010 Google- Maps Data

SITE LOCATION MAP
Former Ideal Uniform Rental Service
13811 A Better Way, Garden Grove, California



File: Figure 1

Date: January 2011

Figure 1

Ideal Uniform Rental Service, Robert D. Adams,
Linda K. England and The Colleen R. Green Trust

Attachment B
Property Description

Recorded in Official Records, Orange County
Tom Daly, Clerk-Recorder
9.00

2010000130637 12:06 pm 03/19/10
276 418 Q01 2
0.00 0.00 0.00 0.00 3.00 0.00 0.00 0.00

**RECORDING REQUESTED BY AND
WHEN RECORDED MAIL TO:**

DRISCOLL & FEDER
1231 E. DYER ROAD, SUITE 235
SANTA ANA, CA 92705

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUITCLAIM DEED

The undersigned grantor declares:

Documentary transfer tax is \$-0-

No consideration.

This conveyance transfers an interest into or out of a living trust. (R&T 11930)

FOR NO CONSIDERATION,

Colleen R. Green, Trustee of the Green Family Trust dated May 15, 2001

hereby REMISES, RELEASES AND QUITCLAIMS TO:

Colleen R. Green, Trustee of the Green Exempt Decedent's Trust u/t/d May 15, 2001

its entire undivided one-half interest in the following described real property in the City of Garden Grove, County of Orange, State of California:

AS PER EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

Commonly known as: 13811 A Better Way, Garden Grove, California
A.P.N. 100-592-01

Dated: January 27, 2010


Colleen R. Green, Trustee

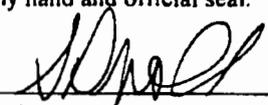
STATE OF CALIFORNIA)
COUNTY OF ORANGE)

On January 27, 2010, before me, Steve Driscoll, Notary Public, personally appeared Colleen R. Green, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature





MAIL TAX STATEMENTS TO: COLLEEN R. GREEN, 5375 EAST BROADWAY, LONG BEACH, CA 90803

EXHIBIT "A"

PARCEL 1 AS SHOWN ON A MAP FILED IN BOOK 4, PAGE 34 OF PARCEL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND THAT PORTION OF PARCEL 3 AS SHOWN ON SAID PARCEL MAP DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEASTERLY CORNER OF PARCEL 2 AS SHOWN ON A MAP FILED IN BOOK 4, PAGE 34 OF PARCEL MAPS, RECORDS OF SAID COUNTY AND STATE, SAID CORNER BEING IN A NON-TANGENT CURVE, CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 1394.99 FEET, A RADIAL LINE THROUGH SAID CORNER BEARS NORTH 78° 34' 45" WEST, SAID CURVE BEING THE WESTERLY LINE OF THE ORANGE COUNTY FLOOD CONTROL DISTRICT RIGHT-OF-WAY; THENCE SOUTHERLY, ALONG SAID CURVE, AN ARC DISTANCE OF 254.06 FEET THROUGH A CENTRAL ANGLE OF 10° 26' 05"; THENCE SOUTH 0° 59' 10" WEST, TANGENT TO SAID CURVE, 109.12 FEET TO THE TRUE POINT OF BEGINNING; THENCE NORTH 89° 01' 31" WEST 169.52 FEET TO A POINT IN A NON-TANGENT CURVE CONCAVE SOUTHEASTERLY AND HAVING A RADIUS OF 970.00 FEET, A RADIAL LINE THROUGH SAID POINT BEARS NORTH 84° 55' 08" WEST; THENCE SOUTHWESTERLY, ALONG LAST MENTIONED CURVE, AN ARC DISTANCE OF 57.06 FEET THROUGH A CENTRAL ANGLE OF 3° 22' 14"; THENCE SOUTH 89° 01' 31" EAST 171.94 FEET TO THE EAST LINE OF SAID PARCEL 3; THENCE NORTH 0° 59' 10" EAST; ALONG SAID EAST LINE 57.00 FEET TO THE TRUE POINT OF BEGINNING.

Recorded in Official Records, Orange County
Tom Daly, Clerk-Recorder
6.00
2010000130638 12:06 pm 03/19/10
278 418 Q01 1
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**RECORDING REQUESTED BY AND
WHEN RECORDED MAIL TO:**

DRISCOLL & FEDER
1231 E. DYER ROAD, SUITE 235
SANTA ANA, CA 92705

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUITCLAIM DEED

Handwritten initials or mark on the right margin.

The undersigned grantor declares:
Documentary transfer tax is \$-0-
No consideration.
This conveyance transfers an interest into or out of a living trust. (R&T 11930)

FOR NO CONSIDERATION,

Colleen R. Green, Trustee of the Green Family Trust dated May 15, 2001

hereby REMISES, RELEASES AND QUITCLAIMS TO:

Colleen R. Green, Trustee of the Green Exempt Decedent's Trust u/t/d May 15, 2001

its entire undivided one-half interest in the following described real property in the City of Garden Grove, County of Orange, State of California:

PARCEL 2, SHOWN ON A MAP FILED IN BOOK 4, PAGE 34, OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID ORANGE COUNTY.

Commonly known as: 13812 A Better Way, Garden Grove, California
A.P.N. 100-591-27

Dated: January 27, 2010

Colleen R. Green

Colleen R. Green, Trustee

STATE OF CALIFORNIA)
COUNTY OF ORANGE)

On January 27, 2010, before me, Steve Driscoll, Notary Public, personally appeared Colleen R. Green, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____
[Handwritten Signature]



MAIL TAX STATEMENTS TO: COLLEEN R. GREEN, 5375 EAST BROADWAY, LONG BEACH, CA 90803

EXHIBIT "A"

THAT PORTION OF PARCEL 3, AS SHOWN ON A PARCEL MAP FILED IN BOOK 4, PAGE 34 OF PARCEL MAPS INCLUDED WITHIN THE FOLLOWING:

PARCEL 1 OF LOT LINE ADJUSTMENT NO. LLA-11-97, IN THE CITY OF GARDEN GROVE, COUNTY OF ORANGE, STATE OF CALIFORNIA, RECORDED MARCH 11, 1998, AS INSTRUMENT NO. 1998-0136366, OF OFFICIAL RECORDS.

62

RECORDING REQUESTED BY AND WHEN RECORDED MAIL TO:

DRISCOLL & FEDER
1231 E. DYER ROAD, SUITE 235
SANTA ANA, CA 92705

Recorded in Official Records, Orange County
Tom Daly, Clerk-Recorder

9.00

2011000085442 3:13 pm 02/15/11

7 Sec4 D10 2

0.00 0.00 0.00 0.00 3.00 0.00 0.00 0.00

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUITCLAIM DEED

1
28
106

The undersigned grantor declares:

Documentary transfer tax is \$-0-

This conveyance transfers an interest into or out of a living trust. (R&T 11930)

FOR NO CONSIDERATION,

Colleen R. Green, Trustee of the Green Family Trust dated May 15, 2001

hereby REMISES, RELEASES AND QUITCLAIMS TO:

Colleen R. Green, Mark Green, Carolyn Green and Kathryn Green, Trustees of the Green Exempt Decedent's Trust u/t/d May 15, 2001

its entire undivided one-half interest in the following described real property in the City of Garden Grove, County of Orange, State of California:

AS PER EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

A.P.N. 100-591-62

Dated: 1/4/11

Colleen R. Green
Colleen R. Green, Trustee

STATE OF CALIFORNIA)
COUNTY OF ~~ORANGE~~)
 LOS ANGELES

On 1-4-11, before me, Sylvia Neri Marsh, Notary Public, personally appeared Colleen R. Green, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Sylvia Marsh



MAIL TAX STATEMENTS TO: COLLEEN R. GREEN, 5375 EAST BROADWAY, LONG BEACH, CA 90803

“Exhibit A” from previous Quitclaim Deed #2011000085442
is not on record at the Orange County Recorder’s Office



Home > Pay/Review Property Taxes New Search

2011-2012 Secured Property Tax

View Cart (Empty)

TAX PAYMENT CART

Pay multiple property tax bills using the new Tax Payment Cart feature.

(Learn More)

SIGN UP FOR SECURED PROPERTY TAX EMAIL REMINDER

The Orange County Treasurer-Tax Collector is now providing a FREE email reminder service to remind you of the Secured Property Tax Delinquent Dates.

(Subscribe Now)

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SECURED PROPERTY TAXES

Secured property taxes are taxes levied on real property. This includes land, mineral and quarries in the land, and improvements, among others.

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Property Tax Information FISCAL YEAR 2011-2012

This page presents tax information on the parcel you have selected. Payments, corrections and/or other adjustments made today may not be reflected until the next business day. Your payment date will be considered the date you completed the transaction online.

Parcel No. 100-591-62 View Original Bill (See Bill Disclaimer)

Legal Description SEC 4 T 5 R 10 POR SE1/4

Tax Rate Area 18-030

Roll Type Secured

This bill was generated on 09/29/2011.

Installments	Delinquent Date	Status	Amount Due	Remarks
First Installment	12/12/2011	PAID	\$0.00	
Second Installment	04/10/2012	PAID	\$0.00	
Total Due and Payable			\$0.00	

The amount above represents the amount due for the 2011-2012 tax year only, and includes any corrections, penalties and fees not reflected in your original tax bill. You may go back to the previous page for any prior year information. For any questions, please contact the Tax Collector's Office at (714) 834-3411 or at ttcinfo@tc.ocgov.com.

Payment Summary

Installments	Date Paid	Amount Paid	Remarks
First Installment	11/22/2011	\$1,104.82	
Second Installment	11/22/2011	\$1,104.82	
Total Amt Paid		\$2,209.64	

Assessed Values and Exemptions

Description	Full Value	Computed Tax
Land	\$186,945	
Mineral Rights	\$0	
Improvements	\$0	
Personal Property	\$0	
Others	\$0	
Total Values	\$186,945	
(Less) Exemptions		\$0
Total Net Taxable Value	\$186,945	\$2,209.64
		<i>Click Here for Detailed Information on What Makes Up Your Taxes!</i>
Total Due and Payable		\$0.00

Search

Treasurer-Tax Collector
Shari L. Freidenrich