

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2015-0520

**CHRISTOPHER CORDES, EDDIE AXNER CONSTRUCTION, INC., AND EDDIE AXNER
ASSESSOR PARCEL 041-300-035-000
SHASTA COUNTY**

PROSECUTION TEAM'S EVIDENCE LIST

Previously Provided Documents¹:

Exhibit No.	Document Date	Document	Filename
1	20-Mar-15	Transmittal Letter - Cleanup and Abatement Order R5-2015-0701 and Administrative Civil Liability (ACL) Complaint R5-2015-0520	Exhibit_1.pdf
2	20-Mar-15	ACL Complaint R5-2015-0520	Exhibit_2.pdf
2 A	20-Mar-15	Attachment A - Specific Penalty Factors Considered for ACL Complaint	Exhibit_2A.pdf
2 B		Attachment B - 19 November 2014 Baker Ridge Inspection Report	See Exhibit_5B
2 C		Attachment C - 28 October 2014 Baker Ridge Inspection Report	See Exhibit_5C
2 D		Attachment D - Secretary of State Filings or Pacific Biodynamics	Exhibit_2D.pdf
3	20-Mar-15	Hearing Procedures for ACL Complaint R5-2015a-0520	Exhibit_3.pdf
4	23-Mar-15	Correction to ACLC R5-2015-0520 Waiver Form	Exhibit_4.pdf
5	20-Mar-15	Cleanup and Abatement Order R5-2015-0701 - Christopher Cordes, Eddie Axner Construction Inc., and Eddie Axner (w/o attachments)	Exhibit_5.pdf
5 A	6-Mar-15	Attachment A, CAO - Baker Ridge Site Map with Responsible Parties Information	Exhibit_5A.pdf
5 B		Attachment B - 19 November 2014 Baker Ridge Inspection Report	Exhibit_2B.pdf
5 C		Attachment C - 28 October 2014 Baker Ridge Inspection Report	Exhibit_2C.pdf
6	27-Oct-14	Inspection Warrant - APNs 041-270-033-000, 041-270-014-000, 041-300-006-000, 041-300-033-000, 041-300-034-000, and 041-300-035-000	Exhibit_6.pdf
7	27-Oct-14	Affidavit in Support of Inspection Warrant - APNs 041-270-033-000, 041-270-014-000, 041-300-006-000, 041-300-033-000, 041-300-034-000, and 041-300-035-000	Exhibit_7.pdf

¹ These previously provided documents are also publicly available at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/index.shtml

Additional Evidence:

Exhibit No.	Document Date	Document	Filename
8	1-Apr-15	Notice of Violation of Fish and Wildlife Code section 1602, 5650, and 5652 - APN 041-300-035	Exhibit_8.pdf
9	19-Mar-15	Penalty Methodology for ACL Complaint R5-2015-0520 (pdf and excel provided)	Exhibit_9.xls
10	13-Mar-15	Economic Benefit Analysis for Baker Ridge Site using EPA's BEN Model - Access Road and Terraces	Exhibit_10.pdf
11	13-Mar-15	Economic Benefit Analysis for Baker Ridge Site using EPA's BEN Model - New Road and Water Crossing Construction	Exhibit_11.pdf
12	10-Mar-15	Analysis of Delayed and Avoided Costs Associated with Baker Ridge Site	Exhibit_12.pdf
13	5-Mar-15	Calculations for Storm Water and Fill Material Discharges to Unnamed Tributaries of North Fork Cottonwood Creek	Exhibit_13.pdf and Exhibit_13.xlsx
14		OGO Gaging Station Precipitation Data used in Storm Water Calculations; Publicly Available http://cdec.water.ca.gov/cdecstation ; Data from Relevant Period Provided	Exhibit_14.pdf and Exhibit_14.xlsx
15	25-Feb-15	Letter Acknowledging that the Ulrich's did not Retain an Ownership in the Property - APN 041-300-035-000	Exhibit_15.pdf
16	20-Feb-15	Comments on Draft Cleanup and Abatement Order for APN 041-300-035, Eddie Axner Construction, Inc.	Exhibit_16.pdf
17	30-Jan-15	Slope Observations APN 041-300-035 Baker Ridge Road, Shasta County, California - CGI Technical Services Inc. Recommendations and Opinions	Exhibit_17.pdf
18	30-Jan-15	Record of Communication between Roy Sherrell and Christopher Cordes	Exhibit_18.pdf
19	22-Jan-15	Draft Cleanup and Abatement Order for APN 041-300-035-000, Christopher Cordes, Johann and Carmen Ulrich, Eddie Axner Construction Inc., and Eddie Axner (w/o attachments)	Exhibit_19.pdf
20	24-Nov-14	Record of Communication between Roy Sherrell and Eddie Axner	Exhibit_20.pdf
21	30-Oct-14	Sediment Description for Soils Sampled from Baker Ridge Site, Pat Vellines, P.G.	Exhibit_21.pdf
22	9-Sep-14	Administrative Hearing Order - Nuisance Abatement, Baker Ridge Road, Igo, CA (APN 041-300-035)	Exhibit_22.pdf
23	18-Aug-14	Shasta County Memorandum of Points and Authorities in Support of Order to Abate Nuisance	Exhibit_23.pdf
24	3-Jul-14	Shasta County Sheriff's Office - MET Team Report for Baker Ridge Road Inspection	Exhibit_24.pdf
25	1-May-13	Google Earth Street View - 101 South F Street, Pensacola, FL, image date 5/2013	Exhibit_25.pdf

Asset Information for Mr. Christopher Cordes:

Exhibit No.	Document Date	Document	Filename
26	21-May-13	APN: 041-300-035-000 - Short Form Deed of Trust and Assignment of Rents	Exhibit_26.pdf
27	21-May-13	APN: 041-300-035-000 - Grant Deed	Exhibit_27.pdf
28	15-May-13	APN: 041-300-035-000 - Installment Note	Exhibit_28.pdf
29	12-Jan-15	Real Property Transaction Record - Christopher Cordes, APN: 041-300-035-000, Shasta County	Exhibit_29.pdf
30	12-Jan-15	Real Property Tax Assessor Record - Christopher Cordes, APN: 041-300-035-000, Shasta County	Exhibit_30.pdf
31	11-Feb-15	Real Property Transaction Record - Christopher Cordes, 19519 Glenwood Canyon Lane, Cypress, TX 77433-2725	Exhibit_31.pdf
32	11-Feb-15	Real Property Tax Assessor Record - Christopher Cordes, 19519 Glenwood Canyon Lane, Cypress, TX 77433-2725	Exhibit_32.pdf
33	11-Feb-15	Real Property Transaction Record - Christopher Cordes, 6547 Lindyann Lane, Houston, TX 77008-5129	Exhibit_33.pdf

Asset Information for Eddie Axner and Eddie Axner Construction Inc.:

Exhibit No.	Document Date	Document	Filename
34	11-Feb-15	Real Property Tax Assessor Record - Axner Living Trust, 21918 Beryl Dr., Palo Cedro, CA 96073-9726	Exhibit_34.pdf
35	11-Feb-15	Real Property Transaction Record - Axner Trust, 22051 Old Forty Four, Palo Cedro, CA 96073	Exhibit_35.pdf
36	11-Feb-15	Real Property Transaction Record - Axner Living Trust, 5249 Old Oregon Trl., Redding, CA 96002-9343	Exhibit_36.pdf
37	8-Apr-15	Real Property Tax Assessor Record - Axner, 22049 Old Forty Four Dr., Palo Cedro, CA 96073	Exhibit_37.pdf
38	8-Apr-15	Real Property Tax Assessor Record - Axner Raymond Edward Jr., 20932 Old 44 Dr., Redding, CA 96003-7985	Exhibit_38.pdf

Eddie Axner Construction Inc., Corporate Information:

Exhibit No.	Document Date	Document	Filename
39	2-Feb-15	Westlaw Company Information - Eddie Axner Construction Inc.	Exhibit_39.pdf
40	6-Feb-15	Eddie Axner Construction Inc., Secretary of State Filings	Exhibit_40.pdf
41	10-Apr-15	Eddie Axner Construction Inc., Secretary of State - Business Entity Detail	Exhibit_41.pdf
42	10-Apr-15	eddieaxner.com_Home	Exhibit_42.pdf (Electronic only)
43	10-Apr-15	eddieaxner.com_ResidentialSitework	Exhibit_43.pdf (Electronic only)
44	10-Apr-15	eddieaxner.com_ErosionControl	Exhibit_44.pdf (Electronic only)

Pacific Biodynamic Corporation Information:

Exhibit No.	Document Date	Document	Filename
45	12-Jan-15	Westlaw Executive Affiliation Record - Pacific Biodynamics	Exhibit_45.pdf
46	15-Jan-15	Pacific Biodynamics, Secretary of State Filings	Exhibit_46.pdf
47	10-Apr-15	Pacific Biodynamics, Secretary of State - Business Entity Detail	Exhibit_47.pdf

Technical Document Referenced:

Exhibit No.	Document Date	Document	Filename
48		USDA Soil Description for Baker Ridge Site - USDA Web Soil Survey	Exhibit_48.pdf
49		USDA National Engineering Handbook - Hydrology Chapters: Chapter 10	Exhibit_49.pdf (Electronic only)
50		USDA National Resources Conservation Service, Conservation Engineering Division: Technical Release 55, June 1986	Exhibit_50.pdf (Electronic only)
51		SHN Erosion Control Plans for Baker Ridge Site	Exhibit_51.pdf

Site Inspection Photos:

Exhibit No.	Document Date	Document	Filename
52	28-Oct-14	Inspection Photos	Exhibit_52 (Electronic only)
53	19-Nov-14	Inspection Photos	Exhibit_53 (Electronic only)

Additional Site Photos Provided to the Water Board:

Exhibit No.	Document Date	Document	Filename
54	12-Apr-13	Photos from Johann Ulrich	Exhibit_54 (Electronic only)
55	24-Jun-14	Photos from Shasta County Department of Resource Management	Exhibit_55 (Electronic only)
56	22-Oct-14	Photos from Shasta County Department of Resource Management	Exhibit_56 (Electronic only)

Declarations & Additional Technical Reference:

Exhibit No.	Document Date	Document	Filename
57	16-Apr-13	Declaration of Dale Fletcher, Building Division Manager/Building Official, Shasta County	Exhibit_57
58		The California Storm Water BMP Handbook	Exhibit_58