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## North Coast Regional Water Quality Control Board

September 8, 2025

Aaron Lieberman  
Paradise Valley, LLC  
Northcoast Investment Group LLC  
Northland Management Group LLC  
2462 Sonnenfelt Road  
Bayside, CA 95524  
[aaronl707@gmail.com](mailto:aaronl707@gmail.com)

Paradise Valley, LLC  
Northcoast Investment Group LLC  
Northland Management Group LLC  
c/o Maureen McCready  
1160 G Street, Suite A  
Arcata, CA 95518

Dear Aaron Lieberman, Paradise Valley LLC, Northcoast Investment Group LLC and Northland Management Group LLC:

Subject: Administrative Civil Liability Complaint. No. R1-2025-0033

File: Cannabis Enforcement, Humboldt County, APNs 220-292-015, 20-292-017, and 220-292-018, CIWQS Place ID 825001

Enclosed is Administrative Civil Liability Complaint No. R1-2025-0033 (Complaint) for Aaron Lieberman, Paradise Valley, LLC, Northcoast Investment Group LLC and Northland Management Group LLC, issued by the Assistant Executive Officer of the North Coast Regional Water Quality Control Board (North Coast Water Board) in the matter of Humboldt County Assessor's Parcel Numbers 220-292-015, 20-292-017, and 220-292-018 (the Property). The Complaint alleges that, between November 9, 2024, and May 23, 2025, you failed to comply with Required Action No. 1 contained in North Coast Water Board Cleanup and Abatement and Investigative Order No. R1-2024-0047 (the Cleanup and Abatement Order). The Complaint proposes an administrative civil liability amount of **\$55,176** for the alleged violation, pursuant to Water Code section 13268, as detailed in Attachment A of the Complaint.

To help ensure the fairness and impartiality of this proceeding, the functions of those who will act in a prosecutorial role (Prosecution Team) by presenting evidence for consideration by the North Coast Water Board have been separated from those who will provide advice to the North Coast Water Board (Advisory Team) prior to and during the hearing. Any members of the Advisory Team who normally supervise any members of the Prosecution Team are not acting as their supervisors in this proceeding, and vice versa. Other members of the Prosecution Team may act or have acted as advisors to the North Coast Water Board in other, unrelated matters, but they are not advising the North Coast Water Board in this proceeding. The Prosecution Team is subject to all applicable rules and regulations as any other party to this proceeding, including the prohibition on ex parte communications.

All submittals and communications to the Advisory Team shall be sent to:

**Advisory Team**

Valerie Quinto  
Executive Officer  
North Coast Water Board  
[Valerie.Quinto@waterboards.ca.gov](mailto:Valerie.Quinto@waterboards.ca.gov)

Nathan Jacobsen  
Attorney IV  
Office of Chief Counsel  
State Water Resources Control Board  
(916) 341-5181  
[Nathan.Jacobsen@waterboards.ca.gov](mailto:Nathan.Jacobsen@waterboards.ca.gov)

Bayley Toft-Dupuy  
Attorney IV  
Office of Chief Counsel  
State Water Resources Control Board  
(916) 341-5165  
[Bayley.Toft-Dupuy@waterboards.ca.gov](mailto:Bayley.Toft-Dupuy@waterboards.ca.gov)

Any substantive communication to the Advisory Team must also be sent to the Prosecution Team listed below.

**Prosecution Team**

Claudia Villacorta, P.E.  
Assistant Executive Officer  
North Coast Water Board  
[Claudia.Villacorta@waterboards.ca.gov](mailto:Claudia.Villacorta@waterboards.ca.gov)

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Kason Grady, P.E.  
Supervising Water Resources Control Engineer  
North Coast Water Board  
[Kason.Grady@waterboards.ca.gov](mailto:Kason.Grady@waterboards.ca.gov)

Jeremiah Puget  
Senior Environmental Scientist  
North Coast Water Board  
[Jeremiah.Puget@waterboards.ca.gov](mailto:Jeremiah.Puget@waterboards.ca.gov)

Adona White, P.E.  
Water Resources Control Engineer  
North Coast Water Board  
[Adona.White@waterboards.ca.gov](mailto:Adona.White@waterboards.ca.gov)

Patrick Lewis  
Attorney III  
State Water Resources Control Board  
Office of Enforcement  
(916) 327-0140  
[Patrick.Lewis@Waterboards.ca.gov](mailto:Patrick.Lewis@Waterboards.ca.gov)

Pursuant to Water Code section 13323, subdivision (b), the North Coast Water Board shall hold a public hearing on this matter within 90 days after service of this Complaint. You may avoid or delay a hearing on the Complaint by selecting one of the following options on the Waiver Form, provided as Attachment B to the Complaint, and returning it to the Advisory Team, with a copy to the Prosecution Team, by September 24, 2025. **If you intend to waive your right to a hearing, I encourage you to sign and submit the Waiver Form as soon as possible.**

1. Waive the right to a hearing before the North Coast Water Board and pay the proposed liability of **\$55,176** in full; or
2. Waive the right to a hearing before the North Coast Water Board within 90 days after service of the Complaint to immediately engage in settlement discussion to resolve the outstanding violation(s).
3. Waive the right to a hearing before the North Coast Water Board within 90 days after service of the Complaint to have additional time to prepare for the hearing or otherwise resolve this matter with the Prosecution Team.

If you have any questions about the Waiver Form options or wish to request an extension to the deadline, you should contact the Advisory Team and copy the

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Prosecution Team. Detailed Hearing Procedures and information regarding the hearing on the Complaint are included as Attachment C to the enclosed Complaint.

Additionally, a Fact Sheet is enclosed, along with the Complaint and its attachments. The Fact Sheet describes the Complaint process and explains what you can expect and your obligations as this matter proceeds. **Please read each document carefully.**

The hearing date is expected to be scheduled on either the first or second day of the North Coast Water Board's meeting of December 4 or 5, 2025, which is tentatively planned to occur in the city of Santa Rosa at the North Coast Water Board's Office, located at 5550 Skylane Blvd, Suite A.

If you have any questions about the Complaint, please contact Adona White of my staff at (707) 576-2672 or by email at [Adona.White@waterboards.ca.gov](mailto:Adona.White@waterboards.ca.gov), or Patrick Lewis, Attorney III, Office of Enforcement at (916) 341-5163 or by email at [Patrick.Lewis@Waterboards.ca.gov](mailto:Patrick.Lewis@Waterboards.ca.gov).

Sincerely,

Claudia E. Villacorta, P.E.  
Assistant Executive Officer

Enclosures:

1. Administrative Civil Liability Complaint No. R1-2025-0033 with Attachments:
  - A. Penalty Methodology
  - B. Hearing Waiver Form
  - C. Hearing Procedures
2. Administrative Civil Liability Fact Sheet

Delivery Receipt Requested

cc:

Nathan Jacobsen  
Office of Chief Counsel  
Attorney IV  
[Nathan.Jacobsen@waterboards.ca.gov](mailto:Nathan.Jacobsen@waterboards.ca.gov)

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Attorney IV  
[Bayley.Toft-Dupuy@waterboards.ca.gov](mailto:Bayley.Toft-Dupuy@waterboards.ca.gov)

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Executive Officer  
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