
San Francisco Bay Regional Water Quality Control Board

August 28, 2020
CIWQS Place ID 862784
WDID No. 2 48CN605913

Param Dhillon and Amandeep Dhillon
2225 Ralmar Avenue
East Palo Alto, California 94303

Sent via certified mail (No. 7019 2280 0001 8685 6335)

Also sent via email: dhillonx@yahoo.com

**Subject: Administrative Civil Liability Complaint No. R2-2020-1028 for
Failure to Submit Technical Reports, Assessor's Parcel Number 0052-160-090,
Vallejo, California, Solano County**

Dear Param and Amandeep Dhillon:

Enclosed with this letter is Complaint No. R2-2020-1028 (Complaint), which proposes imposing a fine, called an administrative civil liability (ACL), against Param Dhillon and Amandeep Dhillon in the amount of **\$81,700**. This fine is based on allegations that you violated section 13267 of the California Water Code (Water Code) twice by failing to submit an acceptable report on construction activities conducted at Solano County Assessor's Parcel Number 0052-160-090, Vallejo, California (the Property) by February 21, 2020, and by failing submit a report regarding the existence and extent of wetlands at the Property by May 8, 2020. These reports were required in our February 7, 2020, "Notice of Violation and 13267 Directive to Submit Technical Reports" (13267 Order) previously sent to you.

We strongly urge you to obtain technical and legal assistance to respond to the Complaint and meet upcoming deadlines, which are detailed in the enclosed documents.

You may respond to the Complaint by defending yourself at a public hearing before the Regional Water Board (option 1 below) or by choosing to waive the hearing and pay the proposed fine or request postponement of the hearing for settlement or other reasons (option 2 below).

1. You have the option to defend yourselves against the Complaint by participating in the Regional Water Board meeting on November 18, 2020. At this meeting, the Regional Water Board will consider whether or not to impose the fine (as proposed in the Complaint or for a different amount), or whether to request the Attorney General take action against you in court.

Refer to the enclosed Public Notice and Hearing Procedure for the Complaint and the ACL Fact Sheet for additional information about the Regional Water Board's process, meeting procedures, and important deadlines (e.g., for submitting comments or evidence, obtaining designated party status, waiving or postponing a hearing, making objections or rebuttals to evidence, etc.).

MICHAEL MONTGOMERY, EXECUTIVE OFFICER

Instructions for participating in the Regional Water Board meeting are available at the following link: [Participating in San Francisco Bay Regional Water Board Meetings during the COVID-19 Emergency.](#)¹

2. You have the option to waive or request that the public hearing not be held as currently scheduled if you take one of the following actions:
 - a. Pay the fine as proposed in the Complaint;
 - b. Request more time and postpone the date of the public meeting; or
 - c. Promptly engage in settlement discussions with the Regional Water Board Prosecution Team.

These options are discussed in further detail in the Waiver Form attached to the Complaint. To select one of these options, complete and submit the Waiver Form, which must be signed, dated, and **received** by the Regional Water Board Advisory Team (refer to attached Hearing Procedure for contact information), with a copy to the Prosecution Team contact listed below, no later than **5:00 p.m. on September 28, 2020**. The Regional Water Board Advisory Team may accept or deny a request made through the Waiver Form.

If you wish to communicate directly with the Prosecution Team regarding the Complaint, please contact Cleet Carlton at (510) 622-2374 or cleet.carlton@waterboards.ca.gov. Our fax number is (510) 622-2460. Refer to the letterhead for our mailing address.

Sincerely,

Lisa Horowitz McCann
Assistant Executive Officer

Enclosures: ACL Complaint No. R2-2020-1028 (Waiver Form attached)
Public Notice and Hearing Procedure for ACL Complaint No. R2-2020-1028
Administrative Civil Liability Fact Sheet

Copy by email: Regional Water Board Lyris Enforcement email list
Regional Water Board Advisory and Prosecution Teams
Param Dhillon, dhillonx@yahoo.com

Copy by mail: Param Dhillon and Amandeep Dhillon
2225 Ralmar Avenue
East Palo Alto, California 94303

¹ https://www.waterboards.ca.gov/sanfranciscobay/board_info/remote_meeting/