

***The Following Exhibits are Available Upon Request***  
 Contact Cleet Carlton at [Cleet.Carlton@Waterboards.ca.gov](mailto:Cleet.Carlton@Waterboards.ca.gov) or Brian Thompson at [Brian.Thompson@Waterboards.ca.gov](mailto:Brian.Thompson@Waterboards.ca.gov) for copies of the exhibits below.

## List of Prosecution Team Exhibits

**Administrative Civil Liability Complaint No. R2-2020-1028**  
**Param and Amandeep Dhillon**  
**Assessor's Parcel Number 0052-160-090**  
**Vallejo, California, Solano County**

Exhibit No.	Statute, Regulatory, and Policy Exhibits Provided by Reference <sup>1</sup>
1	<a href="#">Porter-Cologne Water Quality Control Act</a> <sup>i</sup> (Water Code Division 7 and Related Sections)
2	<a href="#">State Water Resources Control Board Water Quality Enforcement Policy</a> <sup>ii</sup> effective October 5, 2017
3	<a href="#">California Environmental Quality Act</a> <sup>iii</sup> (Pub. Res. Code section 21000 et seq.)
4	<a href="#">White Slough Specific Area Plan</a> <sup>iv</sup> (1996, last amended 2010)
5	<a href="#">White Slough Flood Control Study: Final Detailed Project Report 2001</a> <sup>v</sup>
6	<a href="#">White Slough Protection and Development Act</a> <sup>vi</sup> (Gov't Code section 66670 et seq.)
Exhibit No.	Regulatory Policy Exhibit Provided Electronically
7	California Wetlands Conservation Policy (Executive Order W-59-93)
Exhibit No.	Property Exhibit Provided Electronically
8	Evidence of Ownership of APN 52-160-090: <ul style="list-style-type: none"> <li>• Property Deed</li> <li>• Property Detail Report</li> <li>• Parcel Map for Property</li> <li>• Metroscan Property Profile</li> </ul>

<sup>1</sup> References provided by hyperlink; see endnotes for hyperlink addresses

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<b>Exhibit No.</b>	<b>Notices of Violations and Inspections Exhibits Provided Electronically</b>
9	<b>November 18, 2019:</b> Notice of Violation and Report of November 12, 2019, Inspection
10	<b>February 7, 2020:</b> Notice of Violations and 13267 Directive to Submit Technical Reports
11	<b>March 12, 2020:</b> Inspection Photographs
12	<b>April 30, 2020:</b> Notice of Ongoing Violations and Technical Report Deadlines

<b>Exhibit No.</b>	<b>Other Agency Notices and Inspections Exhibits Provided Electronically</b>
13	<b>October 31, 2019:</b> City of Vallejo Stop Work Notice
14	<b>November 4, 8, 9, 2019:</b> San Francisco Bay Conservation and Development Commission Photographs and Matt Trujillo Declaration
15	<b>November 18, 2019:</b> City of Vallejo Administrative Notice of Violations
16	<b>November 29, 2019:</b> U.S. Army Corps of Engineers Notice of Violation
17	<b>December 9, 2019:</b> City of Vallejo Administrative Citation
18	<b>January 8, 2020:</b> San Francisco Bay Conservation and Development Commission Notice of Violation and Directive to Stop Work
19	<b>July 20, 2020:</b> San Francisco Bay Conservation and Development Commission Violation Report and Karen Donovan Declaration

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**Administrative Civil Liability Complaint No. R2-2020-1028**  
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Exhibit No.	Communication Exhibits Provided Electronically
20	<p style="text-align: center;"><b>Communications Leading to Requirements for Technical Reports (June 2019 to January 2020)</b></p> <ul style="list-style-type: none"> <li>• <b>June 13, 2019:</b> San Francisco Bay Conservation and Development Commission email to Mr. Dhillon regarding White Slough Specific Area Plan and Regional Water Board jurisdiction.</li> <li>• <b>October 31, 2019:</b> City of Vallejo email to Regional Water Board staff regarding activities at the Dhillon property.</li> <li>• <b>January 13, 2020:</b> Regional Water Board staff email to Mr. Dhillon regarding U.S. Army Corps of Engineers Questionnaire.</li> <li>• <b>January 29, 2020:</b> San Francisco Bay Conservation and Development Commission email to Regional Water Board staff and U.S. Army Corps of Engineers that Mr. Dhillon agreed to hire a wetlands consultant.</li> </ul>
21	<p style="text-align: center;"><b>Communications Leading to Administrative Civil Liability Complaint (February to June 2020)</b></p> <ul style="list-style-type: none"> <li>• <b>February 12, 2020:</b> U.S. Army Corps of Engineers email to Mr. Dhillon regarding agencies jurisdictions and wetlands definitions.</li> <li>• <b>May 7, 2020:</b> Regional Water Board staff email to Mr. Dhillon discussing Regional Water Board jurisdiction and technical report requirements.</li> <li>• <b>May 7, 2020:</b> Mr. Dhillon email to Regional Water Board staff stating his property is not a wetland.</li> <li>• <b>May 13, 2020:</b> Mr. Dhillon email to Regional Water Board staff concerning enforcement during COVID-10 and stating his property is not a wetland.</li> <li>• <b>May 18, 2020:</b> Regional Water Board staff email to Mr. Dhillon regarding compliance with regulatory requirements during COVID-19.</li> <li>• <b>May 20, 2020:</b> Regional Water Board staff email to Mr. Dhillon regarding technical report requirements.</li> <li>• <b>May 21, 2020:</b> Mr. Dhillon email to Regional Water Board staff describing site activities.</li> <li>• <b>May 29, 2020:</b> Regional Water Board staff email to Mr. Dhillon noting deficiencies in his description of site activities.</li> <li>• <b>June 17, 2020:</b> Regional Water Board staff email to Mr. Dhillon requesting property access for an inspection.</li> <li>• <b>June 17, 2020:</b> Mr. Dhillon email to Regional Water Board staff denying property access.</li> </ul>

# List of Prosecution Team Exhibits

## Administrative Civil Liability Complaint No. R2-2020-1028 Param and Amandeep Dhillon

22	<p data-bbox="386 289 1393 359"><b>Communications After Administrative Civil Liability Complaint Issuance (September to October 2020)</b></p> <ul data-bbox="386 380 1442 1608" style="list-style-type: none"><li data-bbox="386 380 1325 449">• <b>September 1, 2020:</b> Regional Water Board staff email to Mr. Dhillon confirming receipt of the complaint.</li><li data-bbox="386 457 1325 527">• <b>September 3, 2020:</b> Regional Water Board staff email to Mr. Dhillon discussing the waiver form and ability or inability to pay.</li><li data-bbox="386 535 1419 604">• <b>September 4, 2020:</b> Mr. Dhillon email to Regional Water Board staff stating his intent to sign the Waiver Form.</li><li data-bbox="386 613 1425 682">• <b>September 16, 2020:</b> Mr. Dhillon email to Regional Water Board staff with a signed Waiver Form requesting settlement.</li><li data-bbox="386 690 1360 760">• <b>September 16, 2020:</b> Regional Water Board staff emails to the Advisory Team and Mr. Dhillon acknowledging receipt of a signed Waiver Form.</li><li data-bbox="386 768 1442 837">• <b>September 18, 2020:</b> Regional Water Board staff email to Mr. Dhillon (1 of 2) reminding him to provide a scope of work/agreement for wetland delineation.</li><li data-bbox="386 846 1442 947">• <b>September 18, 2020:</b> Regional Water Board staff email to Mr. Dhillon (2 of 2) clarifying that a call from his consultant is sufficient to confirm wetland delineation work.</li><li data-bbox="386 955 1435 1024">• <b>September 18, 2020:</b> Mr. Dhillon email to Regional Water Board staff stating he emailed a consultant to discuss wetland delineation work.</li><li data-bbox="386 1033 1425 1167">• <b>September 24, 2020:</b> Regional Water Board staff email to Mr. Dhillon reminding him to verify that he retained a wetlands consultant and asking him to send Regional Water Board staff an August 4, 2020, report about his property.</li><li data-bbox="386 1176 1414 1245">• <b>September 28, 2020:</b> Prosecution Team email informing the Advisory Team and Mr. Dhillon when it will respond to Mr. Dhillon's settlement request.</li><li data-bbox="386 1253 1442 1323">• <b>September 30, 2020:</b> Mr. Dhillon email informing Regional Water Board staff that he has not heard back from the wetlands consultant.</li><li data-bbox="386 1331 1393 1400">• <b>October 2, 2020:</b> Regional Water Board staff email informing Mr. Dhillon that settlement terms were not met.</li><li data-bbox="386 1409 1409 1478">• <b>October 2, 2020:</b> Prosecution Team email to inform the Advisory Team and Mr. Dhillon that it does not agree to settlement.</li><li data-bbox="386 1486 1425 1556">• <b>October 6, 2020:</b> Advisory Team email to all parties affirming the November 18, 2020, hearing will proceed as noticed.</li><li data-bbox="386 1564 1409 1608">• <b>October 7, 2020:</b> Prosecution Team email to inform the Advisory Team and Mr. Dhillon that no comments were received on complaint.</li></ul>
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<b>Exhibit No.</b>	<b>Financial Exhibits Provided Electronically</b>
23	Cost Benefit Evaluation: <ul style="list-style-type: none"> <li>• Monk Associates Wetland Delineation Estimate, dated August 25, 2020</li> <li>• U.S. Environmental Protection Agency economic model (BEN Model) results</li> </ul>
24	Ability to Pay Evaluation: <ul style="list-style-type: none"> <li>• Property Values and Mortgages for Properties Owned Individually or Jointly by Dischargers</li> <li>• Tax Assessor Information for Properties Owned Individually or Jointly by Dischargers</li> <li>• Westlaw Information for Properties Owned Individually or Jointly by Dischargers</li> <li>• Work/Business Summary</li> </ul>
25	Staff Costs
26	Ability to Pay Evaluation Expert Witness Qualifications - German Myers

<sup>i</sup>[http://www.waterboards.ca.gov/laws\\_regulations/docs/portercologne.pdf](http://www.waterboards.ca.gov/laws_regulations/docs/portercologne.pdf)

<sup>ii</sup>[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2017/040417\\_9\\_final\\_adopted\\_policy.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final_adopted_policy.pdf)

<sup>iii</sup>[https://leginfo.legislature.ca.gov/faces/codes\\_displayText.xhtml?lawCode=PRC&division=13.&title=&part=&chapter=1.&article=](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=13.&title=&part=&chapter=1.&article=)

<sup>iv</sup>[http://www.bcdc.ca.gov/planning/reports/WhiteSloughSpecificAreaPlan\\_Jan1996.pdf](http://www.bcdc.ca.gov/planning/reports/WhiteSloughSpecificAreaPlan_Jan1996.pdf)

<sup>v</sup>[https://books.google.com/books?id=jyg0AQAAMAAJ&printsec=frontcover&source=gbs\\_ge\\_summary\\_r&cad=0#v=onepage&q&f=false](https://books.google.com/books?id=jyg0AQAAMAAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false)

<sup>vi</sup>[https://leginfo.legislature.ca.gov/faces/codes\\_displayText.xhtml?lawCode=GOV&division=&title=7.2.&part=&chapter=6.&article=](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=&title=7.2.&part=&chapter=6.&article=)