EXHIBIT A

Precision Micro-Analysis Report No. 220111004 (January 11, 2022)

PRECISION MICRO-ANALYSIS INC

SPECIALISTS IN ASBESTOS-RELATED ANALYSIS

Bulk Sample Analysis (PLM) Report

Report# 220111004

Kent Rasmussen
County of Tuolumne, Air Pollution Control District
2 South Green Street
Sonora, CA 95370

Phone: (209) 533-6678

Date Collected: 12/21/21
Date Received: 01/10/22
Date Analyzed: 01/11/22

Job Information:
18955 Industrial Way
Sonora, CA 95370

Sample Number	Sample Location	Sample Description	Analytical Results
KR-01 *Lab# 22-397727*	Northeast part of property	Green serpentine rock	POINT COUNT RESULT: 1.50% CHRYSOTILE & TREMOLITE ASBESTOS (6 asbestos points, 394 non-empty points)
KR-02 *Lab# 22-397728*	Northeast part of property	Green serpentine rock	POINT COUNT RESULT: 2.25% CHRYSOTILE & TREMOLITE ASBESTOS (9 asbestos points, 391 non-empty points)

OFFICIAL NOTICE: After 45 days, samples are disposed of through a licensed waste hauler, unless client requests their return.

Total number of samples: 2

Supervisor _____ Analyst _____

Note: The test result findings are made to the methodologies and parameters described on the reverse of this page.

3463 Ramona Ave., Suite 17 • Sacramento, CA 95826 • (916) 456-4892 • Fax (916) 456-1082

EXHIBIT B

Opportunity to Correct (March 19, 2024)

COMMUNITY DEVELOPMENT DEPARTMENT
Physical Address: 48 WEST YANEY STREET
Mailing Address: 2 SOUTH GREEN STREET
SONORA, CA 95370
(209) 533-5633

OPPORTUNITY TO CORRECT

Date: 03/19/2024 **Case:** 22-614 (SW22-118) **APN:** 097-090-010 **Current Zoning:** BP

Address of Violation: 18955 INDUSTRY WAY, SONORA, CA 95370

Resident/Tenant: SLATON, BRUCE

Property Owner: WOODWORTH, ROBERT; WOODWORTH, DIANE & SLATON, JOHN LAMAR 1/2

Mailing Address: PO BOX 1031, SOULSBYVILLE, CA 95372

You are hereby advised that on 02/22/2024 at approximately 10:00 A.M it was determined that a violation of the Tuolumne County Ordinance Code was found to exist at 18955 INDUSTRY WAY, SONORA, CA 95370.

Violation Code Section: Section 08.05.035 of the Tuolumne County Ordinance Code.

Details of Violation:

1. Operating a construction and demolition/Inert Debris recycling facility.
2. Operating a possible engineered fill facility.

To correct the violation(s) indicated above, the following must be done:

1. Contact the California Department of recycling (CalRecycle) at **(916) 322-4027** and have them determine if the actions taking place on the parcel constitutes the operation of a Construction and demolition/Inert Debris recycling facility or other type of facility and/or engineered fill facility.
2. Any findings and determinations made by CalRecycle is to be reported to Tuolumne County Code Compliance.

VIOLATION(S) MUST BE CORRECTED BY THE DATE OF: 05/22/2024

If you need additional time to correct the violation, you must submit a written request to the Enforcement Officer who signed this Opportunity to Correct at the address provided above prior to the deadline for correction. The request must be in writing and must include a justification for any time extension and a defined plan to correct the violation within a reasonable time frame.

Penalty for Failure to Correct

Failure to correct the violation(s) in compliance with the Tuolumne County Ordinance Code by the date provided above, will result in your being issued a Notice and Order with a penalty of $1,000.00 and a recovery payment of $1,843 for a **total of $2,843.00**. You will also be given a time period in which you must correct the violation. Should you fail to comply within the time stated in the Notice and Order, you will be issued a Final Abatement Order with additional penalties. Any person who fails to correct a violation will be subject to the following:

- Issuance of a Notice and Order with fines and abatement costs that must be paid within thirty (30) days of issuance.
- Other permits or entitlements will not be approved for the parcel.
- Issuance of a Final Abatement Order with additional fines and abatement costs.
- The County may correct the violation and order you to pay the full cost for correcting the violation.
- Unpaid penalties or costs will result in the amounts being added to your tax bill subject to the same penalties and sale as unpaid taxes. A lien will be recorded against the property for the unpaid amounts.

Statute of Limitations - If you believe that the violation has been in existence for five (5) years prior to the date of this notice, you may request withdrawal of this Opportunity to Correct. A request for withdrawal must be submitted in writing to the Code Compliance Officer at the following address:

Code Compliance Officer
Building and Safety Division
2 South Green Street
Sonora, Ca 95370

A request for withdrawal must be submitted with evidence supporting your claim within fifteen (15) days of service of this Opportunity to Correct. The correction date listed in this Opportunity to Correct is stayed until fifteen (15) days after the Code Compliance Officer's decision is mailed to the owner and/or responsible person.

Notwithstanding the application of the Statute of Limitations, all allegations of activities being conducted on the subject premises without the required permits shall be referred to the County Assessors Office for potential reassessment.

Michael Gilles, Code Compliance Investigator

C:\Users\MGilles\Desktop\SW22-118 OTC.doc

EXHIBIT C

CalRecycle Site Observation Report (September 18, 2024)

SITE OBSERVATION REPORT

Name/Location of Site:	**CalRecycle/LEA Representatives:**
Bruce Slaton 18955 Industry Way Sonora, California 95370	Debra Larson, REHS, Tuolumne County Local Enforcement Agency Stephanie Young, Senior WME[1], CalRecycle Michael Clegg, WME, CalRecycle
Date: September 18, 2024 Entry Time In: 10:45 AM Exit Time Out: 1:00 PM	**Report Prepared By:** Michael Clegg
SWIS No: SWIS number has not been assigned.	

OTHER REPRESENTATIVES

Name	Title	Affiliation
Bruce Slaton	Operator	Private Individual
John Slaton	Landowner	Private Individual
Frank Russell	Attorney for Bruce Slaton	Dambacher, Trujillo & Russell
Brian Bell	Building Official	Tuolumne County
Lowell Cottle	Senior Environmental Scientist - Stormwater	Regional Water Quality Control Board
Alejandra Espinoza	Engineering Geologist - Stormwater	Regional Water Quality Control Board
Brad Shelton	Senior Engineering Geologist-Land Disposal	Regional Water Quality Control Board
John Murphy	Supervising Engineering Geologist – Land Disposal	Regional Water Quality Control Board

PURPOSE OF SITE OBSERVATIONS

The purpose of the site visit was to understand the fill operations conducted on the property, discuss the recent site material processes and future development with various agencies and the land owners. The site visit was only to gather information and not to make a determination of the type of landfill operation until further review and discussions are held.

OBSERVATIONS

CalRecycle arrived on site 15 minutes prior to the start of the scheduled meeting. The weather was partly cloudy skies with a slight chance of rain, no wind and the temperature were in the mid-60's. Other agencies present included Tuolumne County Local Enforcement Agency (LEA), Regional Water Quality Control Board (water board), Tuolumne County Building Official, the property owners and their attorney. After introductions, Mr. Slaton begun discussing the fill operations material processing occuring on his property. Mr. Bruce Slaton consented to CalRecycle taking photographs of the site. Approximate locations of the photographs are provided in Figure 1.

According to Mr. Slaton, sources of materials include:

- Pre-ground asphalt from a County road project that is stockpiled on site intended for re-use **(Photograph 1)**.
- Crushed materials consisting of concrete, tile, and brick that was processed at the Waste Management Earth Resources facility, transported to this site and stockpiled. Material is intended for re-use as base rock **(Photograph 2)**.

[1] Waste Management Engineer

- Unprocessed asphalt materials stockpiled on site come from various commercial and residential sources that Mr. Slaton's company works on. Mr. Slaton plans to process this material for re-use on site **(Photograph 3)**.
- Materials that go directly into the "fill" area include unprocessed blocks of concrete, tiles, and bricks. No asphalt is placed in the fill area. Compaction is not measured.
- Stockpiled wood piles from trees that were removed are allowed to dry out and will be transported to a facility in Merced. Mr. Slaton says the material will not be placed in the fill **(Photograph 4)**.
- Mr. Slaton stated that he does not have any records documenting sources of materials, volume, or tonnages received. In addition, Mr. Slaton stated he did not require that any of the incoming material be tested nor did he have any analytical data.

Mr. Slaton presented a plan that was prepared by Krazen & Associates dated May 2024 for site development. He has not provided this plan to the Local Enforcement Agency.

Mr. Bell stated that the County allowed the filling operation as part of a permit granted for building a manufactured home on the property. However, clean soil fill engineered with compaction requirements is required to be under the manufactured home. Inert material was allowed for the other areas not intended for structural use. The County did not specify a compaction requirement for the area that contains non-soil type fill material (concrete, tile, bricks, etc.). The County has been inspecting the fill area and has not observed any garbage or rebar in the fill area. Mr. Bell also stated that they have inspection reports that document the progress of the fill at various stages. Mr. Bell stated that he may be able to share this information after conferring with County counsel.

Mr. Slaton stated that the current edge of the fill area is the limit of the fill. He plans to fill from the edge with a 2:1 slope. The fill will not extend beyond what currently exists today. Mr. Slaton also stated that he does not have plans of the final configuration of the fill area. He stated he does not know what to do with it yet and is just building it up to a certain elevation. He showed us plans for the manufactured home, however, these plans did not include the final contours planned for the fill area.

Mr. Slaton stated that run-on from the property up-slope drains into a culvert that then discharges into a sediment trench that he plans to line, which then will overflow into a ditch and exit into a pond created by others off his property **(Photographs 5 and 10)**.

Ms. Young and Ms. Larson observed organic debris (wood debris) piled up against the fill area, partially covered by plastic **(Photograph 6)**.

Figure 1: Site Map Showing Location of Photographs



Figure Source: Google Earth, 2024.



Photograph 1. Pre-ground asphalt from county road project.



Photograph 2. Crushed materials consisting of concrete, tile, and brick.



Photograph 3. Unprocessed asphalt materials.



Photograph 4. Wood piles from trees removed from fill area per Mr. Slaton.



Photograph 5. Culvert that discharges run-on stormwater from neighboring property into a sediment trench.



Photograph 6. Organic debris (wood debris) piled up against the fill area.



Photograph 7. Upper fill area made up of concrete, tile, soil and rocks. Portion of the slope was tarped.



Photograph 8. Lower fill area covered with crushed rock.



Photograph 9. Area planned for a manufactured home.



Photograph 10. Lower fill deck with culvert that drains into a trench.



Photograph 11. Western end of property with view of stockpiled material.



Photograph 12. Eastern end of property with road covered by asphalt.

CLOSING

Below is a summary of discussions and follow ups between the property owners and various agencies:

- Mr. Cottle requested that Mr. Slaton provide a winterization plan to the Regional Water Quality Control Board. The plan may be sent to Mr. Cottle directly or through Ms. Larson, LEA. Mr. Bell also requested that this information be shared with the County.
- Ms. Larson discussed the presence of organic materials (tree branches, brush) located in the fill that may extend beneath the plastic cover. Mr. Slaton said that is from a tree they pulled out and that he will remove it from the fill area. Ms. Larson stated that inert fill should not contain any organic materials.
- Ms. Larson stated that due to this information, Mr. Slaton should pause his operation (both filling, processing, stockpiling) until the agencies have time to confer and discuss next steps. Mr. Shelton agreed to this approach to cease operations.
- Ms. Larson also noted that the unprocessed asphalt may contain serpentine rock, and that Mr. Slaton should not be processing asphalt with serpentine rock due to the potential for asbestos. That operation should cease, and that Ms. Larson may take samples for further analysis.
- Mr. Russell and Mr. Slaton agreed to cease all operations except for stabilizing the site per the Water Board for stormwater. Mr. Slaton may also remove the organic materials from the fill area prior to stabilizing the site.
- Mr. Shelton stated that the Water Board will work with CalRecycle and the LEA on developing possible next steps.

CalRecycle departed at 1 PM.

EXHIBIT D

LEA Notification to Slaton (May 14, 2025)

COMMUNITY DEVELOPMENT DEPARTMENT

Quincy Yaley, AICP
Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

48 Yaney Avenue, Sonora
Mailing: 2 S. Green Street
Sonora, CA 95370
(209) 533-5633
(209) 533-5616 (Fax)
(209) 533-5909 (Fax – EHD)
www.tuolumnecounty.ca.gov

May 14, 2025

Mr. Bruce Slaton
P.O. Box 1031
Soulsbyville, CA 95372

Subject: LEA Compliance and Notification Tier (LEA Permit) Requirements for Property located at 18955 Industry Way, Assessor's Parcel No. 97-090-10

Dear Mr. Slaton,

The purpose of this letter is to formally document the Tuolumne County Local Enforcement Agency's (LEA) findings regarding the business activities at 18955 Industry Way, Sonora. Additionally, it outlines the steps required to bring the site into compliance with state and local solid waste regulations. This includes clarifying the need for a Notification Tier approval, summarizing the history of the site's use and permitting, and providing a checklist of required submittals to the LEA. Our goal is to work collaboratively with you to resolve any regulatory concerns and ensure that your operations are carried out in a manner that meets applicable health, safety, and environmental standards.

General

The business at the above address is a "manufacturing, processing, and refining" land use in the Business Park (BP) zoning district. In working with you over the last several years, the County has observed that the business operation at this location is the intake, crushing, storage, and distribution of inert debris—including concrete and asphalt. Inert debris, means solid waste and recyclable materials that are source separated or separated for reuse, do not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives and do not contain significant quantities of decomposable waste (Cal. Code Regs. Tit. 14, § 17381). The inert debris on the site has been used for personal property improvements, off-site contracting jobs, and made available for public sale or donation. The debris placed on the property in the noted location in Attachment A was done under County building permit B2023-01196. Debris handled on site has included crushed and uncrushed concrete and asphalt (with and without serpentine content).

The site is categorized as a Type A Inert Debris Processing business and a Type A Inert Debris Fill. Type A inert debris includes materials such as concrete, asphalt, glass, fiberglass, and clay products that do not contain soluble pollutants at concentrations in excess of water quality objectives and has not been treated in order to reduce such pollutants.

LEA Permit Clarification

You have indicated that CalRecycle previously advised you that no "permit" was needed due to the scale of your operation. We acknowledge the potential confusion between "permit" and "notification" – these are two different types of regulations/approvals under the LEA – and while we agree that no "permit" from CalRecycle is required, your operation, using inert debris for a fill and/or certain handling (Type A Inert Debris Processing and Type A Inert Debris Fill), is subject to the *Notification* tier requirements under CCR, Title 14, §§ 17381–17386 and related provisions. This site is considered a Small Volume Inert Debris Processing Operation as it receives less than 25 tons per operating day for the purposes of storage, handling, transfer, or processing, which requires a Notification authorization (Cal. Code Regs. Tit. 14, § Section 17383.7).

Although the building permit allowed inert debris to be placed as fill, the site is also required to be permitted under a 'Notification' Tier by the LEA (Cal. Code Regs. Tit. 14, § Section 17383.7). This determination has been made by the local LEA in conjunction with CalRecycle and the State Waterboard based on the activities that have occurred on the property and the type of material used for the fill.

Notification Required

Currently the fill is considered by the local LEA as an Unpermitted Inert Debris Solid Waste Disposal Site. The checklist of requested documentation is necessary to obtain compliance with the Notification tier requirements, which includes listing in the Solid Waste Information System (SWIS) for tracking purposes. Once the Notification authorization is complete, the on-site debris processing can continue.

To move forward in achieving the Notification, the following needs to be submitted to the LEA within 30 days of the date of this letter:

- Notification Tier Application (via OpenGov) and fee
- Small Volume Construction & Demolition/Inert (CDI) Debris Processing Operation Plan. Attachment B outlines standards that the site will be required to meet for ongoing operations after the Notification is authorized.
- Site Stability and Maintenance Plan
- Plot Map showing site topography and location of fill, storage, and processing areas
- Post-Closure Land Use Plan

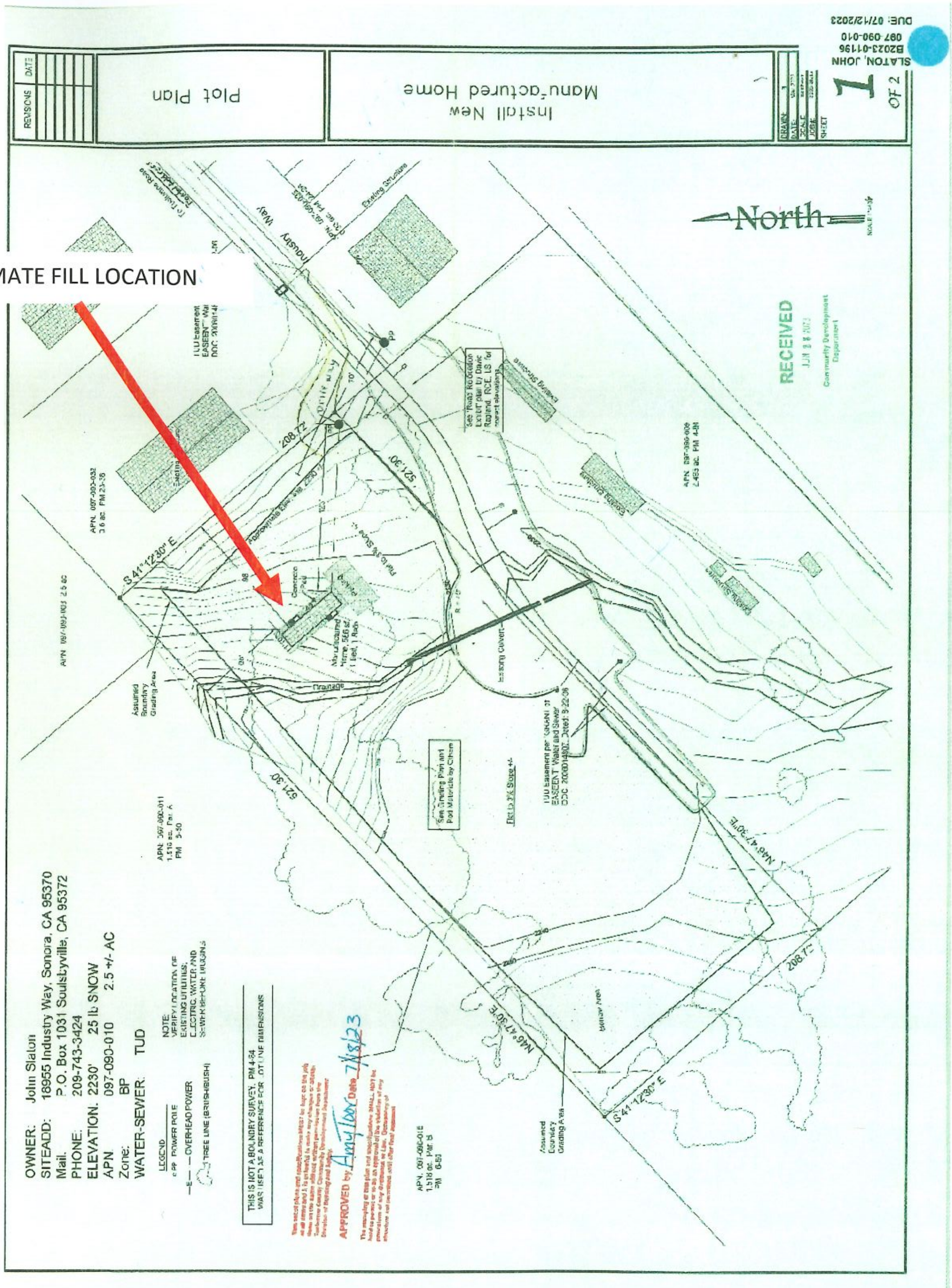
Until the Notification process is complete, the only activity on the site that can occur can be related to the Building Permit.

If you have questions or need assistance with any of the forms or processes, please feel free to contact me at 209-533-5665.

Sincerely,

Debbie Larson, REHS
Environmental Health Director
Tuolumne County Local Enforcement Agency

Attachment A – Building Permit B2023-01196 and Fill Location



Attachment B – Operation Plan Requirements

1. Refrain from accepting, storing, or crushing asphalt containing serpentine rock, unless testing and treatment records are provided to the LEA,
2. Indicate on plans the location and use of materials:
    - Used on-site.
    - Used for off-site contracting.
    - Available for public sale.
3. Use a certified scale to determine product weight and maintain incoming/outgoing load records,
4. Sort inert debris within 15 days.
5. Remove residual material within 48 hours.
6. Do not store inert material for longer than 1 year.
7. Permitted product types (subject to conditions):

Allowed	Prohibited
Clean crushed concrete (off-site origin) – wet methods required	Asphalt containing serpentine rock – regardless of crushing status, unless chemical treated and tested,
Crushed asphalt without serpentine (off-site origin) – wet methods required and no offsite odors	Materials other than Type A

Under the Notification tier process, the LEA can require specific design requirements and operational standards for the site, which can include measures to control or limit noise (Cal. Code Regs. Tit. 14, § 17408.3), drainage (Cal. Code Regs. Tit. 14, § 17407.3), hazardous, liquid, and special wastes (Cal. Code Regs. Tit. 14, §17407.5), and dust (Cal. Code Regs. Tit. 14, § 17407.4). After the LEA has reviewed the above submission, the resulting Notification may include additional operating standards to prevent the facility from being a nuisance (Cal. Code Regs. Tit. 14, § 17408.5).

EXHIBIT E

LEA Letter to CalRecycle (September 12, 2025)

COMMUNITY DEVELOPMENT DEPARTMENT

Quincy Yaley, AICP
Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

48 Yaney Avenue, Sonora
Mailing: 2 S Green Street
Sonora, CA 95370
(209) 533-5637
(209) 533-5616 (Fax)
www.tuolumnecounty.ca.gov

September 12, 2025

Mr. Wes Mindermann, P.E., Chief Engineering Support Branch
Ms. Stephanie Young, P.E. Senior Waste Management Engineer
Mr. Michael Clegg, P.E., Waste Management Engineer
CalRecycle
1001 I Street
Sacramento, CA 95812

RE: Public Health and Safety Protections, County Requirements, and Local Mitigations for Small Inert Debris Fill Located and 18955 Industry Way for Property Owner Mr. Bruce Slaton, Assessor's Parcel No. 97-090-010

Dear Regulatory Partners,

Thank you all for your time and efforts to help resolve the issues surrounding Mr. Slaton's small inert debris fill at 18955 Industrial Way (property) and for the time spent to address citizens' complaints that have been brought to your attention. The County of Tuolumne's goal is to resolve and clarify past oversight, move forward with Building Department oversight for soil completions, while making sure that public health, public safety, and the environment are protected.

Brief History

Two permits were issued regarding the property. The first permit was for grading by Public Works. Then, the permit changed to a building permit issued by the Building Division, for a manufactured home. The permits allowed for the initiation of a fill with inert debris on the property. There were several inspections with County and State representatives. The County received complaints over time, and it was discovered that a Solid Waste permit should have been obtained. Mr. Slaton was instructed by Tuolumne County Code Enforcement to contact CalRecycle to see if a permit was required. There may have been some confusion with the regulatory requirements at this point and Mr. Slaton continued with the fill as he believed that no permit was required per an email by Isabelle Maalouf, Permitting Specialist at CalRecycle. Time passed and more complaints and inspections ensued, and it was determined that Mr. Slaton should have an Enforcement Agency Notification (EA Notification) for his activities. At his point Mr. Slaton was notified of the LEA Notification requirements for the fill and processing and Mr. Slaton stopped filling with inert debris and started on winterizing the area.

As the LEA we are responsible for oversight of solid waste activities under our purview which includes inert debris handling. The LEA has reviewed documents and pictures by Code Enforcement Officers, inspected the site, and concluded that the inert debris placed in the fill has had significant visual and regulatory oversight, i.e. the regulatory oversight has been extensive in identifying and mitigating environmental health and safety.

Moving forward toward a final resolution of the activities and inert debris deposits we suggest the following mitigations to protect public health, public safety, and the environment:

Public Health and Safety Protections

1. Notice of Action

A Notice of Action is a document attached to the deed of a property. A Notice of Action runs with the property in perpetuity. This document will outline that the inert debris fill exists and the limits of development above and around the inert debris fill area. This document is triggered every time there is a sale or Title search on the property.

2. Historic Oversight and Inspections

The nature of the inert debris is mainly chunky concrete. Public Works, Code Enforcement Officers, the Building Official, and the LEA have periodically inspected the fill. The fill and concrete was inspected throughout the investigation and oversight process by County staff more frequently than if the LEA had been engaged in a regulated landfill. Code officers that did see some items within the concrete such as rebar had the property owner remove those items and the owner complied. The LEA observed some wood debris adjacent from tree removal and Mr. Slaton removed that debris which was never intended for the fill area – it was from recent tree removal activities.

3. Water Protection

The Waterboard has indicated that the inert debris fill, due to the size and nature of the debris, does not pose a leaching hazard. The LEA and the CUPA concur as the material is similar to a concrete foundation and is not ground in a manner that may leach a basic pH.

4. Final Grading and Compaction

The inert debris fill site is stabilized and has been maintained in a manner that protects public health, safety, and the environment, while ensuring long-term structural integrity of the fill. Stabilization and maintenance activities have been overseen by the Building Official and implemented in accordance with applicable building/grading standards, approved grading plans, and best management practices for erosion control, drainage, and dust suppression.

The site will be graded to the approved final contours, ensuring proper slope stability and drainage. Side slopes will not exceed safe engineering limits—generally a maximum of 3:1 (horizontal to vertical)—unless otherwise justified by a geotechnical report. The surface will be uniformly compacted to reduce settlement potential and prevent sloughing or erosion. No waste exposed, mitigations for erosion control.

5. Erosion Control and Surface Stabilization

To prevent soil loss and sediment transport, the site will be stabilized using a combination of erosion control measures until the Building Official determines that the grading is complete.

6. Drainage and Runoff Management

A permanent stormwater management system is constructed. Approved surface completions shall follow best management practices to direct surface water away from slopes and prevent ponding on the fill.

7. Dust and Air Quality Control

Access roads are covered and/or stabilized to minimize airborne particulates. This follows local air quality management district requirements. During future grading activities, until grading is complete, the property owner will use best management practices for dust control.

8. Access Control and Site Security
The site is private property, is fenced, and prevents public access.

9. Monitoring and Inspection
Until grading is complete under the building permit, the site will be periodically inspected. The owner will be instructed to correct any deficiencies observed.

Conclusion
By implementing these stabilization and maintenance measures, the inert debris fill site will remain structurally stable, environmentally compliant, and safe for surrounding communities. Monitoring and prompt corrective action until grading is complete are essential to ensuring the long-term integrity and beneficial reuse of the site.

We look forward to collaborating with you in these site determinations.

Sincerely,

Debbie Larson, REHS
Environmental Health Director/LEA

EXHIBIT F

LEA Enforcement Activity Clarification (December 19, 2025)

COMMUNITY DEVELOPMENT DEPARTMENT

Roger Root, CAO
Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

48 Yaney Avenue, Sonora
Mailing: 2 S. Green Street
Sonora, CA 95370
(209) 533-5633
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(209) 533-5909 (Fax – EHD)
www.tuolumnecounty.ca.gov

December 19, 2025

Mr. Bruce Slaton
18955 Industry Way
Sonora, CA 95370

Subject: **Clarification of Activities Not Subject to LEA Permitting and Follow-up for LEA-Unpermitted Type A Inert Debris Fill for Property Located at 18955 Industry Way, Assessor's Parcel No. 97-090-10**

Dear Mr. Slaton,

On October 17, 2025 this Division acting as the solid waste Local Enforcement Agency (LEA) conducted an inspection at the above referenced property to verify conditions and operations under LEA jurisdiction. Mr. Rick Barrieau, Senior Building Inspector, was also present to evaluate the slope finish in the area of the LEA-unpermitted Type A Inert Debris Fill and the future area proposed for the manufactured home.

The purpose of this letter is to formally clarify operational standards for ongoing Type A Inert Debris handling that does not currently require LEA permitting, and address the status of the LEA-unpermitted Type A Inert Debris Fill.

Surface Handing (above grade)/Storage of Type A Inert Debris
To be excluded from LEA permitting for surface-handling of Type A Inert Debris the Business/Owner shall maintain the following regulatory limits pursuant to CCR, Tile 14:

1. **No processing may occur** – crushing, grinding or similar activities are not allowed on site.
2. **All intake of product shall be source separated** – no separation activities are allowed on site,
3. **Storage/handling maximum limit is 15 cubic yards** at any time on the property.
4. **If operating as a recycling center not subject to Article 5.9**, proof/recordkeeping of storage times shall me maintained and the site remains subject to LEA verification to ensure compliant status. Storage limits are increased when operating under this category.

Subsurface (below grade) Deposits of Type A Inert Debris/Type A Inert Debris Fill
No additional Type A Inert Debris fill may be added to the parcel. The existing LEA-unpermitted fill has been evaluated by State and County stakeholders. At this time, it has not been determined

whether CalRecycle will direct the LEA to require ongoing permitting for the fill. The LEA has requested CalRecycle to consider an alternative to ongoing permitting such as a Notice of Action.

Cover Over Type A Inert Debris Fill

Stormwater best management practices were discussed to mitigate stormwater illicit discharges. Mr. Slaton and Mr. Barrieau discussed that Mr. Slaton would hydroseed the face of the completed fill. The path for the stormwater was discussed and the practices appeared satisfactory. The practices have also been reviewed by Lowell Cottle, QISP, QSD/P, CPESC, at the Waterboard.

Fill Area for Manufactured Home

Mr. Slaton and Mr. Barrieau discussed the method and materials to be used, including lifts of clean dirt, for the area under the proposed manufactured home and that compaction testing would be required to verify the adequacy of the fill.

Manufactured Home Siting

The LEA and the Community Development Department (CDD) may require further clarification regarding the siting of the manufactured home. Current permit documentation may indicate that the manufactured home is situated over a portion of the LEA-unpermitted fill. Additional review and coordination between Mr. Slaton, the LEA, and CDD may be necessary to determine if the placement indicated in Attachment A (below) is permissible.

If you have questions, please feel free to contact me at 209-533-5665.

Sincerely,

Debbie Larson, REHS
Environmental Health Director
Tuolumne County Local Enforcement Agency

Attachment A

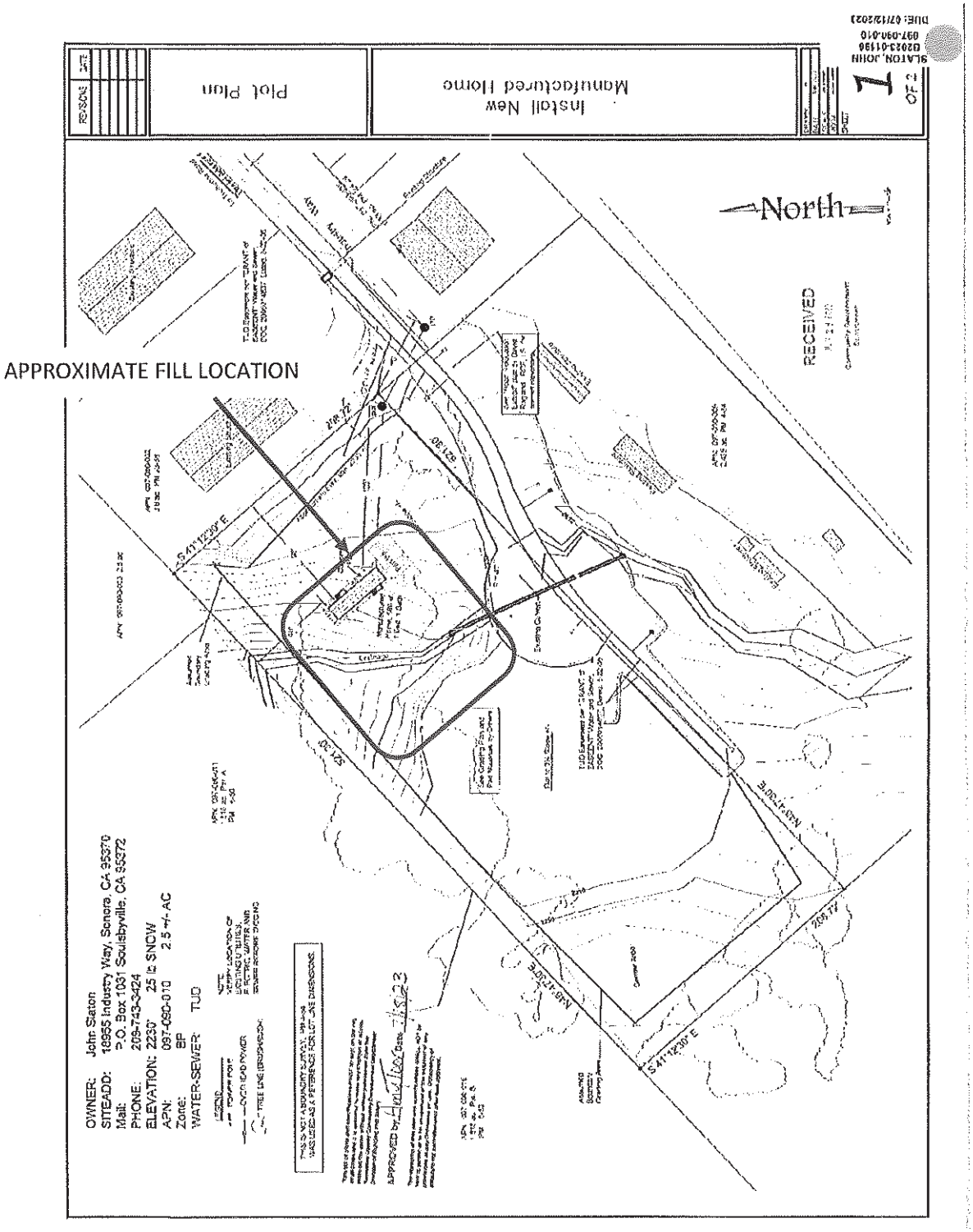


EXHIBIT G

LEA Serpentine Removal and Testing Directive (May 11, 2026)

COMMUNITY DEVELOPMENT DEPARTMENT

Roger Root
Interim Director

Land Use and Natural Resources – Housing and Community Programs – Environmental Health – Building and Safety – Code Compliance

Environmental Health Division
48 Yaney Avenue, Sonora
Mailing: 2 S. Green Street
Sonora, CA 95370
(209) 533-5639
(209) 533-5909 (Fax – EHD)
www.tuolumnecounty.ca.gov

May 11, 2026

Trustee Diane Woodworth
Trustee Robert A. Woodworth
Owner John Lamar Slaton
P.O. Box 1031
Soulsbyville, CA 95372

Subject: **Removal of Pile(s) Containing Serpentinite and Testing of Crushed Material at 18955 Industry Way, Sonora; Assessor's Parcel No. 97-090-10**

Dear Trustees Woodworth and Woodworth, and Mr. Slaton,

The Tuolumne County Environmental Health Department is the certified Local Enforcement Agency (LEA) for solid waste permitting within the County of Tuolumne, including the solid waste facility permitting requirements in Public Resources Code sections 44001 et seq., and the state minimum standards and related regulations applicable to the handling, storage, processing, and disposal of solid waste. The LEA's authority includes enforcement of solid and hazardous waste laws and regulations including:

- California Public Resources Code (PRC) Division 30, Part 4, Chapter 2, Article 5,
- California Code of Regulations (CCR) Title 14 Division 7, Chapter 3, Article 5.9, 17381.1,
- CCR Title 22, Chapter 11, Article 1, section 66261.3 et. seq. (hazardous waste).

Enforcement authority is delegated under the PRC section 44000, and the California Health and Safety Code (CHS), Division 20 section 25404.

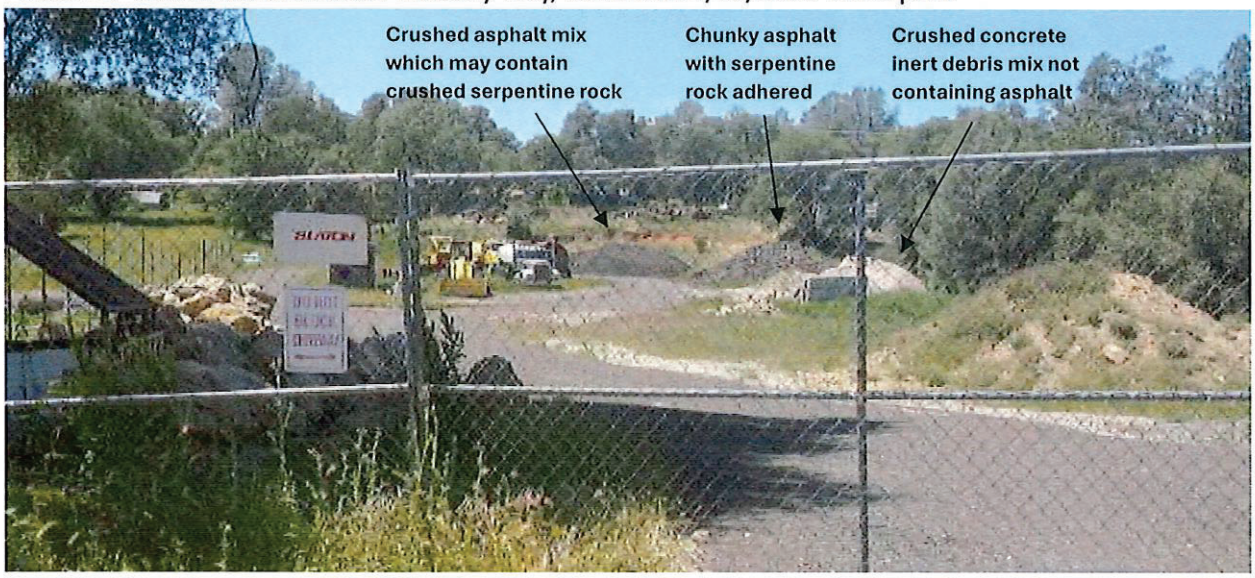
This letter outlines the required actions regarding stockpiled uncrushed and crushed material that appears to contain serpentinite or serpentinite-adhered debris and the pile that contains crushed concrete. Material stored under the CalRecycle "Not Subject to Article 5.9" for inert debris allowance must be free of hazardous waste and must be removed within one year of storage. Because serpentinite-known to potentially contain asbestos-is adhered to chunky asphalt debris and may be present within the crushed asphalt pile, the material may pose a respirable asbestos concern. Respirable asbestos is subject to, at a minimum, hazardous waste control law.

Based on the information currently available to the County, the following requirements apply:

Uncrushed asphalt inert debris with serpentine adherence
This material must be removed from the parcel and disposed of at an approved facility. All transfer operations must include effective dust control. Submit to the Environmental Health Department (EHD) your removal plan, the destination facility, and receipts verifying proper disposal or recycling.

Crushed material containing serpentinite
Asbestos sampling is required to determine whether the material meets hazardous waste criteria and to establish the appropriate disposal or allowable use(s). The EHD will initiate sampling and will arrange for a third-party consultant to collect composite samples. Samples will be split so that you may conduct independent testing if desired. All samples will be collected under chain of custody and analyzed by a California certified approved laboratory.

Picture 1: Site conditions 18955 Industry Way, Sonora on 4/30/2026 12:11 p.m.



Any pile that tests as hazardous waste must be covered, labeled, and properly disposed of within 30 days. Such material shall be subject to the Certified Unified Program Agency (CUPA) hazardous waste control laws and regulations found in the California Health and Safety Code and CCR Title 22 also enforced by the EHD. Material stored on-site without documentation establishing storage duration must likewise be removed within 30 days.

Crushed concrete – As part of site sampling, the crushed concrete pile will be sampled for crystalline silica content to establish if the pile would be considered a hazardous material.

The EHD will contact you shortly to schedule sample collection.

Please note: The County acknowledges receipt of your correspondence disputing the applicability of the December 19, 2025 letter and asserting that the site is "grandfathered," that prior County discussions authorized broader operations, and that the County cannot change the land use or zoning of the property. While the Business Park Zoning Ordinance allows certain processing activities, bringing solid

waste onto the property requires Local Enforcement Agency (LEA) oversight. Because you have chosen not to obtain LEA permits only limited activities involving inert debris are permitted.

For purposes of solid waste regulation and LEA oversight, the December 19, 2025 letter remains the County's controlling clarification of the activities that may occur on the site without LEA permits. The operational thresholds identified in the December 19, 2025 letter are statewide solid waste regulatory requirements under Title 14 of the California Code of Regulations, not discretionary County conditions that may be waived, negotiated, or contractually superseded by the property owner. Any prior communications with County staff or other officials cannot override current state solid waste regulations or the LEA's duty to enforce them; however, if you possess written proof of LEA approval or other documentation you contend is relevant, please feel free to provide it.

Please feel free to reach out with any questions.

Respectfully,

Debbie Larson, REHS
Environmental Health Director
Local Enforcement Agency
CUPA

EXHIBIT H

Email from Wes Mindermann to M. Renee Orth (August 19, 2026)

On Wed, Aug 19, 2026 at 4:29PM Mindermann, Wes@CalRecycle <Wes.Mindermann@calrecycle.ca.gov> wrote:

> Hi Renee,
>
> Checked with our staff on the attachments to the site form. They indicated that there were no attachments and the form is incorrect.
>
> I also checked with CalRecycle staff on the sampling. They had no new info or any update to share. I emailed the LEA and they indicated they are working on obtaining site access to do sampling at some future date.
>
> I'll follow up tomorrow on the rest of your questions.
>
> Regards,
>
> Wes Mindermann, PE
> Chief I Engineering Support Branch I Waste Permitting, Compliance, & Mitigation Division
> O: (916) 341-6320
> M: (916) 365-3772
> E: wes.mindermann@calrecycle.ca.gov
>
> 
>

EXHIBIT I-1

Evidence-Preservation Letter to County of Tuolumne (July 27, 2026)

M. RENÉE ORTH
ATTORNEY AT LAW
P.O. Box 213 • Standard, California 95373
Tel: (310) 995-1582 • Renee@ReneeOrth.com

July 27, 2026

VIA US MAIL AND EMAIL

Walter Wall, County Counsel
Office of the County Counsel, County of Tuolumne
2 South Green Street
Sonora, CA 95370

Re: Demand for Preservation of Evidence — Anticipated Litigation Concerning 18955 Industry Way, Sonora, California (APN 097-090-010); Government Claims of Dorriya Anderson, et al.

Dear County Counsel:

I represent Dorriya ("Ree") and Craig Anderson, James and JoAnn Roberts, Frank and Antonio Fernandez, Jim Fernandez, and Patricia Reh (collectively, "Claimants"), owners and residents of properties adjoining or in the immediate vicinity of 18955 Industry Way, Sonora (the "Site").

I. ANTICIPATED LITIGATION

Claimants anticipate filing a civil action in the Tuolumne County Superior Court naming the County of Tuolumne, together with John Lamar Slaton, Bruce Slaton, Robert A. and Diane Woodworth, and DJ Slaton Excavation (the "Slaton Defendants"), arising from the unpermitted solid waste disposal, fill, and processing operations at the Site. As to the County, the anticipated claims include inverse condemnation, nuisance, and a petition for writ of mandate (Code Civ. Proc. § 1085), among others, arising in part from the County's deposit of surface debris from the Tuolumne Road project at the Site in or about August–September 2024, its issuance and subsequent revocation of grading permit G2019-00027, its possession since January 2022 of laboratory results confirming chrysotile and tremolite asbestos in Site material, and its enforcement conduct with respect to a site its own Local Enforcement Agency determined on May 14, 2025 to be an unpermitted inert debris solid waste disposal site.

This letter is a formal demand that the County preserve, and take affirmative steps to prevent the destruction, deletion, alteration, or loss of, all Documents, electronically stored information, and physical evidence described below, wherever located within County government, including the offices and departments identified in Section V. The County's common-law preservation duty attached no later than its receipt of this letter, and nothing in Government Code sections 26200–26205 or any County records-retention schedule authorizes the destruction of records relevant to pending or reasonably anticipated litigation. This demand is independent of, and does not supersede or satisfy, any California Public Records Act request that has been or may be submitted on Claimants' behalf.

II. DEFINITIONS

As used in this letter, "Documents" means all documents, records, and tangible things of any kind, in any form and however stored, including originals, drafts, and non-identical copies. "ESI" means electronically stored information of every type, including email, text messages (SMS/MMS/iMessage), instant and application-based messages (e.g., WhatsApp, Signal, Facebook Messenger), voicemail, photographs, video, social media content and messages, word-processing files, spreadsheets, databases, accounting records, calendar entries, GPS and telematics data, metadata, and system backups, whether residing on servers, workstations, laptops, tablets, cell phones, external drives, cloud accounts, or backup media, and whether on business or personal devices or accounts.

"Site" means the real property at 18955 Industry Way, Sonora, California (APN 097-090-010), together with all improvements, fill, stockpiles, and materials located on it.

III. RELEVANT TIME PERIOD

Unless otherwise stated, this demand covers January 1, 2019 through the present, and on a continuing basis hereafter. For Documents concerning asbestos at or near the Site (including the December 2021 sampling), the purported 1973 easement, and title to the Site, the demand applies without any date limitation.

IV. CATEGORIES OF EVIDENCE TO BE PRESERVED

Without limiting the general demand above, the County must preserve the following:

1. Tuolumne Road project records: plans, specifications, bid documents, contracts and change orders, daily inspection and construction reports, and all records identifying the quantity, characterization, hauling, and destination of asphalt grindings and surface debris removed from the project, including any agreement, arrangement, ticket, invoice, payment record, or communication concerning the deposit of such material at the Site in or about August–September 2024.

2. Complete permit files for the Site, including grading permit G2019-00027 (issuance, the June 13, 2022 revocation, and the July 27, 2022 notice), building permit B2023-01196 (including its February 21, 2024 closure), and any other application, permit, entitlement, or approval, together with all internal and external communications concerning them.

3. Code enforcement file P21-116 and all other code-enforcement, complaint, or investigation files concerning the Site, including complaint-intake records, logs, photographs, inspector notes, and communications with complainants.

4. All Local Enforcement Agency and Environmental Health records concerning the Site, including inspection records; Solid Waste Information System (SWIS) entries and related communications; and all drafts, internal communications, and files concerning the September 18, 2024 joint site report and cessation agreement, the May 14, 2025 determination letter, the September 12, 2025 letter to CalRecycle, the December 19, 2025 clarification letter, the May 11, 2026 directive, and monitoring of compliance with each.

5. All Air Pollution Control District records concerning the Site or its vicinity, including the December 2021 sampling and Precision Micro-Analysis Report No. 220111004, chains

of custody, related complaints and inspections, and all records reflecting the County's receipt, distribution, and handling of those laboratory results from January 2022 forward.

6. All communications between the County and CalRecycle (including Eric Kiruja, Michael Clegg, Stephanie Young, Isabelle Maalouf, and Nevin Yeates), the Central Valley Regional Water Quality Control Board (including the December 2024 correspondence), or any other state or federal agency concerning the Site or the Cal Sierra Earth Resource Facility on Camage Avenue.

7. All communications between the County (including any officer, employee, or agent) and any Slaton Defendant, the Woodworths, or their agents, consultants, contractors, or counsel.

8. Board of Supervisors, County Administrator, and County Counsel records concerning the Site, the Tuolumne Road project material, or asbestos at or near the Site, including agendas, minutes, staff reports, briefing materials, and memoranda (privileged materials must be preserved even if they may later be withheld from production).

9. All records concerning naturally occurring asbestos or serpentine soils at or in the vicinity of the Site, including maps, policies, guidance, and dust-mitigation plans or requirements.

10. All risk-management, insurance, joint-powers-authority, and claims files concerning the Site or the Claimants' government claims.

11. All ESI of custodians with responsibility for or knowledge of the foregoing, including email, text messages, instant messages, voicemail, and calendars, expressly including but not limited to communications concerning public business conducted on personal devices or personal accounts, which remain subject to preservation and disclosure obligations. (See *City of San Jose v. Superior Court* (2017) 2 Cal.5th 608.)

12. All backup media, archives, and legacy systems containing any of the foregoing.

V. LITIGATION HOLD

The County should immediately issue a written litigation hold to, at minimum, custodians within the Office of the County Counsel, the County Administrator's Office, the Clerk of the Board of Supervisors, the Community Development Department (including Building and Code Compliance), the Department of Public Works, Environmental Health/the Local Enforcement Agency, and the Air Pollution Control District, and should suspend all automatic email deletion, retention-expiration purges, and disposal of the records described above.

VI. CONSEQUENCES OF SPOLIATION

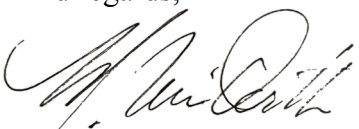
The duty to preserve relevant evidence arises upon reasonable anticipation of litigation, and litigation should now be reasonably anticipated by each recipient of this letter. Destruction, deletion, alteration, or loss of relevant Documents, ESI, or physical evidence — whether intentional or through failure to suspend routine practices — may expose the responsible party to evidentiary, issue, monetary, and terminating sanctions (Code Civ. Proc. § 2023.030; *Williams v. Russ* (2008) 167 Cal.App.4th 1215; *Cedars-Sinai Medical Center v. Superior Court* (1998) 18 Cal.4th 1), to an adverse-inference instruction that the suppressed evidence would have been

unfavorable (Evid. Code § 413; CACI No. 204), and potentially to criminal liability (Pen. Code § 135).

VII. CONFIRMATION REQUESTED

Please confirm in writing within fourteen (14) days of the date of this letter, to the email address above, that the County has received this demand, issued a litigation hold, suspended routine destruction practices as to the records described above, and identified the custodians and departments to which the hold has been distributed. This letter is not a complete statement of Claimants' claims or contentions, and Claimants reserve all rights and remedies, including all administrative and judicial remedies against the County.

Kind regards,



M. Renée Orth
Attorney for Claimants

cc by email only:

Clerk of the Board of Supervisors
Director, Community Development Department
Director, Department of Public Works
Director, Environmental Health / Local Enforcement Agency (Debra Larson, REHS)
Air Pollution Control District
Clients

EXHIBIT I-2

Evidence-Preservation Letter to Slaton Defendants (July 27, 2026)

M. RENÉE ORTH
ATTORNEY AT LAW
P.O. Box 213 • Standard, California 95373
Tel: (310) 995-1582 • Renee@ReneeOrth.com

July 27, 2026

VIA CERTIFIED MAIL

John Lamar Slaton and DJ Slaton Excavation
P.O. Box 1031
Soulsbyville, CA 95372

Bruce Slaton, individually and dba BJ Slaton Trucking
20195 Tuolumne Rd. N.
Tuolumne, CA 95379

Robert A. Woodworth and Diane Woodworth, individually and as trustees
P.O. Box 1031
Soulsbyville, CA 95372

Re: Demand for Preservation of Evidence — Anticipated Litigation Concerning 18955 Industry Way, Sonora, California (APN 097-090-010)

To each addressee:

I represent Dorriya ("Ree") and Craig Anderson, James and JoAnn Roberts, Frank and Antonio Fernandez, Jim Fernandez, and Patricia Reh (collectively, "Claimants"), owners and residents of properties adjoining or in the immediate vicinity of the Site. If you are represented by counsel in connection with the Site, please deliver this letter to your counsel immediately.

I. ANTICIPATED LITIGATION

Claimants anticipate filing a civil action in the Tuolumne County Superior Court against John Lamar Slaton, Bruce Slaton, Robert A. Woodworth, Diane Woodworth, and DJ Slaton Excavation (collectively, the "Slaton Defendants"), among others, arising from the unpermitted solid waste disposal, fill, and processing operations conducted at the Site. The anticipated claims include private nuisance, public nuisance, trespass (airborne particulate, including asbestos-containing dust), trespass (surface water and sediment discharge), negligence and negligence per se, violation of the Unfair Competition Law (Bus. & Prof. Code § 17200 et seq.), and declaratory and injunctive relief concerning the purported 1973 access easement burdening 18970 Industry Way. The factual record includes, among other things, the December 2021 laboratory confirmation of chrysotile and tremolite asbestos in Site material; the September 18, 2024 joint CalRecycle/LEA/Regional Water Board site report and cessation agreement; the LEA's May 14, 2025 determination that the Site is an unpermitted inert debris solid waste disposal site; the LEA's December 19, 2025 clarification of operational limits; and the LEA's May 11, 2026 directive and the dust-generating removal activity that followed it.

This letter is a formal demand that each of you preserve, and take affirmative steps to prevent the destruction, deletion, alteration, or loss of, all Documents, electronically stored information, and physical evidence described below. This demand extends to materials in the possession, custody, or control of your employees, agents, family members involved in the operations, contractors, subcontractors, haulers, consultants, accountants, and insurers, and you should promptly transmit this demand to each such person.

II. DEFINITIONS

As used in this letter, "Documents" means all documents, records, and tangible things of any kind, in any form and however stored, including originals, drafts, and non-identical copies. "ESI" means electronically stored information of every type, including email, text messages (SMS/MMS/iMessage), instant and application-based messages (e.g., WhatsApp, Signal, Facebook Messenger), voicemail, photographs, video, social media content and messages, word-processing files, spreadsheets, databases, accounting records, calendar entries, GPS and telematics data, metadata, and system backups, whether residing on servers, workstations, laptops, tablets, cell phones, external drives, cloud accounts, or backup media, and whether on business or personal devices or accounts.

"Site" means the real property at 18955 Industry Way, Sonora, California (APN 097-090-010), together with all improvements, fill, stockpiles, and materials located on it.

III. RELEVANT TIME PERIOD

Unless otherwise stated, this demand covers January 1, 2019 through the present, and on a continuing basis hereafter. For Documents concerning the purported 1973 easement, title to or ownership of the Site, and asbestos at or near the Site, the demand applies without any date limitation.

IV. CATEGORIES OF EVIDENCE TO BE PRESERVED

Without limiting the general demand above, you must preserve the following:

1. Material intake records: all records identifying the source, generator, type, quantity, and date of any soil, fill, inert debris, construction and demolition (C&D) debris, asphalt, asphalt grindings, concrete, rock, or other material accepted at, delivered to, or deposited on the Site, including manifests, weighmaster certificates, scale and load tickets, trip logs, dispatch records, invoices, receipts, purchase orders, and customer lists and files.

2. All contracts, work orders, tickets, invoices, and communications with the Cal Sierra Earth Resource Facility (14909 Camage Avenue) or any Waste Management entity concerning the crushing, processing, transfer, sorting, or delivery of material to or from the Site, including all records concerning material of unknown origin received under any such contract.

3. All records concerning material received from the County of Tuolumne or its contractors, including asphalt grindings or surface debris from the Tuolumne Road project deposited at the Site in or about August–September 2024, and all related communications, agreements, tickets, and payment records.

4. Outbound and removal records: all records identifying the destination, hauler, quantity, date, and characterization of any material removed from the Site at any time, together with all removal plans, dust-control plans and measures, testing performed before or during removal,

and related communications — specifically including all removals occurring after the LEA's May 11, 2026 directive.

5. All environmental testing and sampling records relating to the Site or to material accepted at or removed from it — asbestos, soil, water, air, or otherwise — including laboratory reports, chains of custody, field notes, photographs, and communications with laboratories, engineers, and consultants, including Krazan & Associates and all files underlying its May 10, 2024 geotechnical letter.

6. All communications and records exchanged with, received from, or concerning the Tuolumne County Local Enforcement Agency/Environmental Health, Community Development, Public Works, the Air Pollution Control District, CalRecycle, or the Central Valley Regional Water Quality Control Board, including all records concerning the September 18, 2024 joint site visit and cessation agreement and your compliance or noncompliance with agency determinations and directives.

7. All permit files and related communications, including grading permit G2019-00027 and its revocation, building permit B2023-01196, and any other permit, entitlement, or approval sought or obtained for the Site.

8. Operations records: daily logs, site diaries, work orders, employee and subcontractor identities and time records, equipment inventories, usage and maintenance logs, fuel records, and GPS, telematics, or dashcam data for trucks and equipment used at or in connection with the Site.

9. All photographs, video, drone footage, and surveillance-system recordings depicting the Site or surrounding properties, from any device or account.

10. Financial records reflecting revenue or other consideration received in connection with the acceptance, processing, storage, or disposal of material at the Site, including tipping or dump fees, ledgers, accounting records, bank records, and tax records.

11. Entity and insurance records: formation, ownership, and governance records for DJ Slaton Excavation and any related or predecessor entity; and all potentially applicable insurance policies (including commercial general liability, contractor's, pollution, and umbrella/excess coverage) and related correspondence. You should place your carriers on notice of this preservation demand.

12. All Documents concerning the purported 1973 access easement over 18970 Industry Way, including title documents, surveys, maps, any plans or proposals to install a gate or otherwise control or restrict access, and communications with Frank Fernandez, Antonio Fernandez, or any predecessor-in-interest.

13. All communications among the Slaton Defendants, or between any of them and any third party, concerning the Site's operations, neighboring residents or their complaints, dust, asbestos, water discharge, agency enforcement, or this dispute, in any medium, including email, text message, voicemail, and social media.

14. All devices and accounts used in connection with the operations described above — cell phones, computers, tablets, email accounts, cloud storage, and social media accounts — as to which all automatic deletion, message-expiration, and disposal practices must be suspended immediately.

V. ESI — SPECIFIC INSTRUCTIONS

Preserve all ESI in native format with metadata intact. Immediately suspend any automatic deletion, archiving, overwriting, or retention-expiration functions on all devices, accounts, and systems identified above, including message auto-delete settings on cell phones and messaging applications. Do not dispose of, wipe, trade in, reformat, or replace any device containing potentially relevant ESI without first preserving a complete forensic image of it.

VI. THE SITE ITSELF

The Site and the material on it are themselves evidence. Except as expressly required by a written directive of the LEA, CalRecycle, or the Regional Water Board, do not grade, excavate, bury, cover, crush, remove, commingle, or otherwise alter the fill, stockpiles, or materials at the Site. If agency-directed work is performed, you must document it fully — including photographs, testing, dust-control records, and source and destination records for any material moved — and preserve all such documentation, together with any physical samples collected.

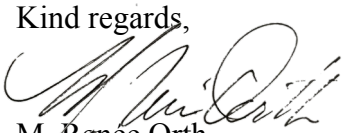
VII. CONSEQUENCES OF SPOLIATION

The duty to preserve relevant evidence arises upon reasonable anticipation of litigation, and litigation should now be reasonably anticipated by each recipient of this letter. Destruction, deletion, alteration, or loss of relevant Documents, ESI, or physical evidence — whether intentional or through failure to suspend routine practices — may expose the responsible party to evidentiary, issue, monetary, and terminating sanctions (Code Civ. Proc. § 2023.030; Williams v. Russ (2008) 167 Cal.App.4th 1215; Cedars-Sinai Medical Center v. Superior Court (1998) 18 Cal.4th 1), to an adverse-inference instruction that the suppressed evidence would have been unfavorable (Evid. Code § 413; CACI No. 204), and potentially to criminal liability (Pen. Code § 135).

VIII. CONFIRMATION REQUESTED

Please confirm in writing within fourteen (14) days of the date of this letter, to the email address above, that you have received this demand, implemented a litigation hold, suspended routine destruction practices, and transmitted this demand to all persons identified in Section I. Please also identify the persons responsible for compliance. This letter is not a complete statement of Claimants' claims or contentions, and Claimants reserve all rights and remedies.

Kind regards,



M. Renée Orth
Attorney for Claimants

cc: Clients (by email)

EXHIBIT J-1

Photo Log, 18955 Industry Way (September 30, 2024)

Photo Log 18955 Industry Way Sonora, CA 95370



Photo 1. Unstabilized access road to lower pad.

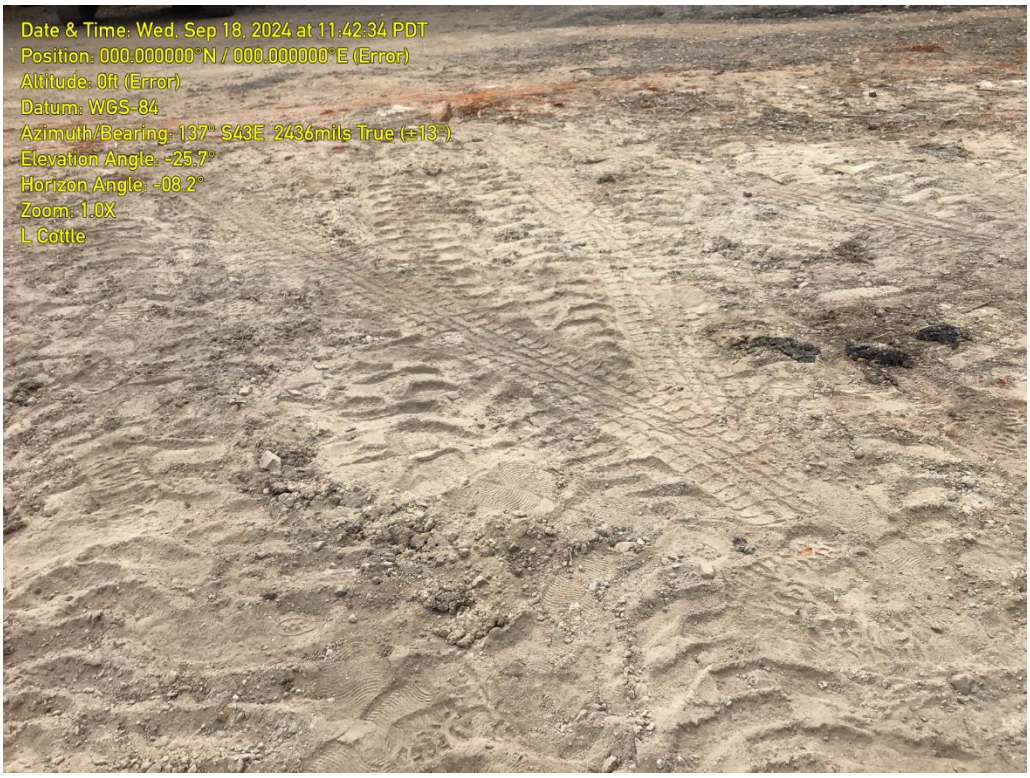


Photo 2. Unstabilized area on upper pad.



Photo 3. Silt fence needs to be reinstalled or replaced, and slopes stabilized.



Photo 4. Silt fence needs to be reinstalled or replaced, and slopes stabilized.



Photo 5. Unstabilized slopes on upper pad.



Photo 6. Unstabilized stormwater detention basin at culvert outfall. Note: appropriate perimeter sediment controls need to be installed below culvert (arrows).



Photo 7. More disturbed soil at the wood debris storage area, west side of Facility.

.



Photo 8. Unprotected soil stockpiles, west side of the Facility.

EXHIBIT J-2

Declaration of Dorriya Anderson (signed September 9, 2026)

M. Renee Orth (SBN 241847)
P.O. Box 213
Standard, California 95373
Telephone: 310-995-1582
Email: renee@reneeorth.com
Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF TUOLUMNE

DORRIYA ANDERSON; CRAIG ANDERSON; JAMES ROBERTS; JOANN ROBERTS; FRANK FERNANDEZ; ANTONIO FERNANDEZ; JIM FERNANDEZ; and PATRICIA REH,

Plaintiffs,

v.

JOHN LAMAR SLATON, an individual; BRUCE SLATON, an individual; ROBERT A. WOODWORTH and DIANE WOODWORTH, individually and as trustees; DJ SLATON EXCAVATION, form unknown; COUNTY OF TUOLUMNE, a political subdivision of the State of California; and DOES 1 through 50, inclusive,

Defendants.

Case No. CV68663

DECLARATION OF DORRIYA ANDERSON IN SUPPORT OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION; FOR ORDER PRESERVING EVIDENCE AND FOR EXPEDITED INSPECTION AND SAMPLING

I, Dorriya Anderson, declare:

1. I am a Plaintiff in this action. I have personal knowledge of the facts stated in this declaration, and if called as a witness I could and would competently testify to them.

2. I reside near the real property at 18955 Industry Way, Sonora (the "Site"). On Thursday, September 3, 2026, at approximately 4:14 p.m., I witnessed heavy equipment — an excavator and a tractor-trailer — being moved onto the Site. I called the Sheriff to report that the defendant was possibly preparing to remove evidence central to pending litigation (incident number 52609030101).

3. On the morning of Friday, September 4, 2026, at approximately 9:23 a.m., I personally observed material being excavated at the Site and prepared for loading and removal.

4. At 9:25 a.m. on Friday, September 4, 2026, I called Roger Root to inform him that the Slatons were preparing to remove material from the Site. Mr. Root said he would send the LEA, Debbie Larson, to the Site. At 10:02 a.m. I texted Mr. Root to let him know Ms. Larson had not yet arrived. At approximately 10:04 a.m., Ms. Larson arrived at the Site with CDD Director Tamera Blankenship and did not stop the removal of the material. Kent Rasmussen of the Air Pollution Control District had arrived on Site shortly before Ms. Larson and Ms. Blankenship. At 10:19 a.m., I texted Mr. Root to inform him that Ms. Larson and Ms. Blankenship were allowing the material to be removed. Upon departing the Site, Ms. Blankenship told me there was nothing they could do to stop it.

5. At approximately 11:26 a.m. I witnessed a white Slaton dump truck loaded with the removed material driving along Mono Way and proceeding onto the on-ramp of State Route 108 heading toward Jamestown, with a cloud of dust being emitted from the untarped dump truck bed.

6. Defendant Bruce Slaton had a representative on the Site operating a drone to record the removal of the material.

7. At approximately 10:30 a.m. on Friday, September 4, 2026, I went to the entrance of the Site on Industry Way, where I met a man who introduced himself as Rick Flovin, a friend of defendant Bruce Slaton, who was observing the removal of the material and attempted to broach a negotiated settlement of the litigation with me.

8. On Tuesday, September 8, 2026, I witnessed Slaton's dump trucks removing additional material from the Site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 9, 2026, at Sonora, California.

Dorriya Anderson

EXHIBIT J-3

Declaration of Scott Fischler (signed September 9, 2026)

M. Renee Orth (SBN 241847)
P.O. Box 213
Standard, California 95373
Telephone: 310-995-1582
Email: renee@reneeorth.com
Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF TUOLUMNE

DORRIYA ANDERSON; CRAIG ANDERSON; JAMES ROBERTS; JOANN ROBERTS; FRANK FERNANDEZ; ANTONIO FERNANDEZ; JIM FERNANDEZ; and PATRICIA REH,

Plaintiffs,

v.

JOHN LAMAR SLATON, an individual; BRUCE SLATON, an individual; ROBERT A. WOODWORTH and DIANE WOODWORTH, individually and as trustees; DJ SLATON EXCAVATION, form unknown; COUNTY OF TUOLUMNE, a political subdivision of the State of California; and DOES 1 through 50, inclusive,

Defendants.

Case No. CV68663

DECLARATION OF SCOTT FISCHLER IN SUPPORT OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION; FOR ORDER PRESERVING EVIDENCE AND FOR EXPEDITED INSPECTION AND SAMPLING

I, Scott Fischler, declare:

1. I am a legal assistant to M. Renée Orth, counsel for Plaintiffs in this action. I have personal knowledge of the facts stated in this declaration, and if called as a witness I could and would competently testify to them.

2. On Thursday, September 3, 2026, at 4:13 p.m., I received a text message from Plaintiff Dorriya Anderson stating, "Slaton is unloading equipment on the parcel," reporting that an excavator and tractor-trailer were being moved onto the real property at 18955 Industry Way, Sonora (the "Site").

3. I went to the vicinity of the Site on Friday, September 4, 2026, arriving at approximately 9:43 a.m., and again on Tuesday, September 8, 2026, arriving at approximately 2:12 p.m. On both occasions I personally observed the excavation, loading, and removal of material from the Site.

4. While in the vicinity of the Site I took video of the activity. While there, I spoke with a man who identified himself as Rick Flovin and stated that he was a friend of Bruce Slaton. I insisted that Mr. Flovin speak immediately with Mr. Slaton and cease removal of the material, which was evidence subject to litigation filed on August 3, 2026. Mr. Flovin spoke with Mr. Slaton and returned to inform me that Mr. Slaton would not cease removal operations. Mr. Flovin told me the Slatons had not yet hired an attorney but that doing so was imminent. I asked Mr. Flovin to place a couple of shovelfuls of the material in a bag I provided so that it could be tested. Mr. Flovin spoke to Bruce Slaton, who refused the request for a sample. Mr. Flovin reported that he then called Jim Hatler to ask about providing a sample, and Mr. Hatler also declined. On Friday, September 4, 2026, when I asked Rick Flovin why Jim Hatler was involved, he responded that Hatler was receiving the material at his facility for reprocessing. I subsequently learned that Hatler's facility is located in Jamestown,

believed to be named Sierra Rock Products. On Tuesday, September 8, 2026, Rick Flovin stated to me the reprocessed material was slated to be repurposed.

5. I observed Kent Rasmussen of the Air Pollution Control District present at the Site on Friday, September 4, 2026. Mr. Rasmussen said that the County had agreed to allow the removal of the material.

6. I spoke briefly with Tamera Blankenship outside the Site, and she told me that the County would be considering what action to take regarding the removal. Given the resumption of removal on Tuesday, September 8, 2026, the County apparently did nothing to intervene.

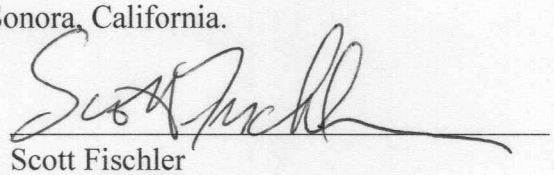
7. I contacted the Office of the Board Clerk regarding the removal. The Board Clerk connected me with Todd James, an attorney with the County Counsel's office, who told me that the County had no authority to stop the defendants from removing the material, with the implication that the County had approved the removal.

8. On Friday, September 4, 2026, I witnessed Slaton's excavator moving the pile of untested material, causing a plume of dust to rise from the pile, while the person operating the water hose to wet the material for dust control had taken a break and stopped hosing down the material. Rick Flovin confirmed for me that Bruce Slaton was operating the excavator.

9. Based on what I observed on both days, material is actively being removed from the Site and transported away from it.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 9, 2026, at Sonora, California.



Scott Fischler

EXHIBIT K

Internal County Email from Bill Sandman (APCD) (February 11, 2022)

X RE: Slaton Complaint - Follow Up

Best Body | Headers | Attachments | Raw Props | Plaintext Body | RTF Text

Hi Bill-
Speaking for CDD, there are currently no violations of the Tuolumne County Ordinance Code on this parcel, that CDD has responsibility for. Please let me know if you have any other questions.

Thank You,
Brian Bell CASp, CBO
Chief Building Official
Tuolumne County Building and Safety

-----Original Message-----
From: Bill Sandman <BSandman@co.tuolumne.ca.us>
Sent: Friday, February 11, 2022 8:01 AM
To: Brian Bell <BBell@co.tuolumne.ca.us>; Quincy Yaley <QYaley@co.tuolumne.ca.us>; Kim MacFarlane <KMacFarlane@co.tuolumne.ca.us>
Cc: Kelle Schroeder <KSchroeder@co.tuolumne.ca.us>; Kent Rasmussen <KRasmussen@co.tuolumne.ca.us>
Subject: Slaton Complaint - Follow Up

Hey Brian:

Thanks for the follow up and the letter. That's what I assumed, you were providing him a letter based on your/CDD's regs.

He hasn't been as truthful the last couple months as we would have liked.

Just to let you, Quincy, and, Kim know, we are going to require him to cover all of the serpentine is has laid down on that property (or water it on a regular basis). He originally stated there was just a couple of small loads on the south end close to where he is filling for his cul de sac. He actually has serpentine on almost the entire property where equipment and traffic moves in and out. He also stated when he crushes with his excavator, he uses water for dust suppression, that is not a factual statement either.

Just so Air Pollution is clear on the status; is Slaton in compliance with all CDD/Building/Public Works regulations, or are there any outstanding issues any of you have with his operation?

Thanks,

Bill

Take care.

Bill

Bill Sandman

EXHIBIT L

Email from CalRecycle to LEA Transmitting Model Cease-and-Desist Order (July 24-25, 2024)

From: Young, Stephanie@CalRecycle
To: dlarson@co.tuolumne.ca.us
Date: 2024-07-25 19:30:41.826124+00:00
Subject: FW: Example Cease and Desist for Illegal Disposal Site

---

Hi Debra,

My apologies! I inputted your email correctly. Here it is from yesterday.

Thank you,

Stephanie

From: Young, Stephanie@CalRecycle

Sent: Wednesday, July 24, 2024 11:45 AM

To: dlarson@co.tuolumne.ca.gov

Cc: Kiruja, Eric@CalRecycle ; Yeates, Nevin@CalRecycle ; Clegg, Michael@CalRecycle ; Lawrence, Paulina@CalRecycle ; Maalouf, Isabelle@CalRecycle

Subject: Example Cease and Desist for Illegal Disposal Site

Hi Debra,

It was a pleasure speaking with you today regarding Mr. Slaton's project. Attached is the Cease and Desist Order for a similar project in Merced County that I hope you find helpful.

Please feel free to reach out to us if you need additional assistance.

Take care,

Stephanie

Stephanie Young, P.E.

Senior Waste Management Engineer

Closed, Illegal, and Abandoned Sites

CalRecycle

1001 I Street, 10th Floor

Sacramento, California 95814

Work Phone: (916) 323-1100

Mobile Phone: (916) 957-7081

Email: Stephanie.Young@calrecycle.ca.gov

EXHIBIT M-1

Internal CalRecycle Email re Letter to Bruce Slaton (May 20, 2025)

From: "Maalouf, Isabelle@CalRecycle"
To: Quincy Yaley ; "Clegg; Michael@CalRecycle" ; "Young; Stephanie@CalRecycle" ; "Kiruja; Eric@CalRecycle"
Date: 2025-05-20 16:20:04+00:00
Subject: Re: letter to Bruce Slaton

Hi all,

I am adding Eric (my supervisor) to this email thread.

Thanks,

Isabelle

From: Maalouf, Isabelle@CalRecycle

Sent: Tuesday, May 20, 2025 9:19 AM

To: Quincy Yaley ; Clegg, Michael@CalRecycle ; Young, Stephanie@CalRecycle

Cc: Debra Larson

Subject: Re: letter to Bruce Slaton

Hi all,

As mentioned during the call:

The definition of processing as it pertains to Construction and Demolition and Inert Debris Transfer/Processing Regulatory Requirements is in 14 CCR 17381 , subsection (v):

Crushing would fall under volume reduction.

-Isabelle

Isabelle Maalouf, MBA (she/her)

Environmental Scientist

Permitting and Assistance Branch - North Unit

Waste Permitting, Compliance and Mitigation Division

(916) 322-1914

Isabelle.Maalouf@CalRecycle.ca.gov

California Department of Resources Recycling and Recovery

From: Quincy Yaley

Sent: Tuesday, May 20, 2025 9:12 AM

To: Maalouf, Isabelle@CalRecycle ; Clegg, Michael@CalRecycle ; Young, Stephanie@CalRecycle

Cc: Debra Larson

Subject: letter to Bruce Slaton

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Here is the letter that was sent.

Quincy

Quincy Yaley, AICP

Director

Community Development Department

48 Yaney, 4th Floor

Sonora, CA 95370

209-533-5961

qyaley@co.tuolumne.ca.us

https://www.tuolumnecounty.ca.gov/170/Development

EXHIBIT M-2

Internal CalRecycle Email re Letter to Bruce Slaton (May 27, 2025)

From: Young, Stephanie@CalRecycle
To: Kiruja, Eric@CalRecycle
Cc: Clegg, Michael@CalRecycle; Maalouf, Isabelle@CalRecycle
Subject: RE: letter to Bruce Slaton
Date: Tuesday, May 27, 2025 8:20:00 AM
Attachments: image001.png

Hi Eric,

Thank you for checking that! It sounded very suspicious to me and perhaps when you return the LEA's call, you can clarify this with them and follow-up with an email documenting that conversation. Truly appreciate if you copy us on that email as well for our records.

Thanks!
Stephanie

From: Kiruja, Eric@CalRecycle <Eric.Kiruja@CalRecycle.ca.gov>
Sent: Friday, May 23, 2025 5:00 PM
To: Young, Stephanie@CalRecycle <Stephanie.Young@CalRecycle.ca.gov>
Cc: Clegg, Michael@CalRecycle <Michael.Clegg@CalRecycle.ca.gov>; Maalouf, Isabelle@CalRecycle <Isabelle.Maalouf@calrecycle.ca.gov>
Subject: RE: letter to Bruce Slaton

Hi Stephanie…I'm sorry for the tardiness, I've been desperately trying to respond but couldn't get to it (too many permits in play).

It sure looks like the letter states that activities covered under the building permit are good to continue (contrary to our understanding that activities should cease and go though proper closure).

FYI…the LEA tried to reach out to us yesterday about this, looks like we may have to regroup again and set the record straight.

I'm open to meeting next week for further discussion.

Have a great weekend.

Eric.

From: Young, Stephanie@CalRecycle <Stephanie.Young@CalRecycle.ca.gov>
Sent: Wednesday, May 21, 2025 8:52 AM
To: Maalouf, Isabelle@CalRecycle <Isabelle.Maalouf@calrecycle.ca.gov>; Kiruja, Eric@CalRecycle <Eric.Kiruja@CalRecycle.ca.gov>
Cc: Clegg, Michael@CalRecycle <Michael.Clegg@CalRecycle.ca.gov>
Subject: FW: letter to Bruce Slaton

Hi Eric and Isabelle,

Just checking if I am reading this correctly, but is the LEA allowing them to continue to use the site for disposal operations under the building department or if they get a processing permit? We advised that the fill must cease and be closed in place. But I don't think I got that from this letter. Truly appreciate your thoughts on how you interpret this.

Thanks!
Stephanie

From: Quincy Yaley <QYaley@co.tuolumne.ca.us>
Sent: Tuesday, May 20, 2025 9:13 AM
To: Maalouf, Isabelle@CalRecycle <Isabelle.Maalouf@calrecycle.ca.gov>; Clegg, Michael@CalRecycle <Michael.Clegg@CalRecycle.ca.gov>; Young, Stephanie@CalRecycle <Stephanie.Young@CalRecycle.ca.gov>
Cc: Debra Larson <DLarson@co.tuolumne.ca.us>
Subject: letter to Bruce Slaton

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Here is the letter that was sent.

Quincy

Quincy Yaley, AICP
Director
Community Development Department
48 Yaney, 4th Floor
Sonora, CA 95370
209-533-5961
qyaley@co.tuolumne.ca.us
https://www.tuolumnecounty.ca.gov/170/Development

Tuolumne County
CALIFORNIA

EXHIBIT N

CalRecycle Internal Timeline and Summary (July 3, 2025)

From:	Mindermann, Wes@CalRecycle
To:	Lawrence, Paulina@CalRecycle; de Bie, Mark@CalRecycle; Lewis, Shyenne@CalRecycle; Sellards, Kim@CalRecycle; Yee, Eric@CalRecycle; Yeates, Nevin@CalRecycle; Young, Stephanie@CalRecycle
Subject:	RE: Tuolumne Disposal Site Discussion
Date:	Thursday, July 3, 2025 11:02:27 AM
Attachments:	Slayton Letter Sign Final.pdf

Greetings all,

Below is a timeline Mike and Stephanie worked on regarding the activities we have been involved with this site to date in preparation for the meeting today. They were trying to guide the LEA as best as we could throughout this process, but ultimately, it is the LEA's responsibility to follow through with their actions. Also attached is the letter that the LEA sent to the owner in May 2025.

Thanks - Wes

Timeline

July 2024 – The CIA section was brought into the project by PAB to provide review of Draft permitting guidance email to Tuolumne County LEA on addressing a potential IDEFO site in Sonora, CA.

July 2024 – CalRecycle (PAB and CIA) discussed with LEA on issuing a Cease-and-Desist Order (example provided to LEA) to stop operations at site. It was also suggested to reach out to the RWQCB regarding their requirements.

August 2024 – Attending a Teams meeting with the LEA, CIA and the Water Board. Water Board enforcement brings in Water Board cleanup, permitting, and stormwater programs.

September 2024 – CalRecycle, LEA Tuolumne County Building Official, RWQCB and property owner with his council conducted site visit at Slaton Property on 9/18/2024. Photo documentation and on-site discussions with all parties to better understand site history and operations. LEA agreed to provide a letter to RP to suspend construction activities and operations in the interim. A Site Observation Report was prepared and further discussions were planned between CalRecycle and RWQCB to provide path forward.

September 2024 – CalReycle CIA section communicated with LEA to provide documents (county inspection reports and engineering plans) in support of upcoming meeting with RWQCB. Additionally, CalReycle followed up with LEA on progress of letter to RP on holding on construction activities. See email dated 9/23/2024

September 2024 – RWQCB stormwater issued Site Winterization Plan dated 09/30/2024 with site improvements to meet deficiencies.

October to December 2024 – Worked on getting a SWIS number assigned and coordinating a follow-up meeting with the Water Board after allowing time for the Water Board to process the field visit.

December 2024 – CalReycle CIA section followed up and received confirmation from RWQCB stormwater that RP satisfied requirements from Site Winterization Plan. Email dated 12/10/2024

December 2024 – CalReycle CIA section followed up with RWQCB Land Disposal. Land Disposal provided a response to Slaton property issues stating no indication of threat to water quality by fill material in its current state. However, if operations were to continue, they would re-visit the need for a WDR. Email dated 12/17/2024.

December 2024 – CIA followed up with LEA. LEA stated they were working on a Stipulated Order.

January 2025 – Complainant reaches out to CalEPA on ongoing concerns at Slaton Property. CalEPA notifies CalReycle CIA section who then forwards message to LEA and follow up on status of notification order. CIA would forward emails to the LEA and request follow-up.

February 2025 – CalRecycle CIA section provided action items to document the fill on site as a closed (unpermitted, inactive) Solid Waste Disposal Site under LEA jurisdiction to trigger use of Inspection Form 188. See email dated 2/13/2025

May 5, 2025 – Discuss with WEEB on potential next steps with regards to complainant and LEA. Informed WEEB that they may receive a referral from CalEPA re: LEA's response.

May 2025 – LEA issues Compliance and Notification letter to RP after discussion with County Community Development Department. Letter dated 5/14/2025. CIA and PAB meets with LEA to request they respond to Ms. Anderson's emails. LEA sends an email to Ms. Anderson on May 30, 2025.

-----Original Appointment-----

From: Lawrence, Paulina@CalRecycle
Sent: Wednesday, July 2, 2025 9:50 AM
To: Lawrence, Paulina@CalRecycle; de Bie, Mark@CalRecycle; Lewis, Shyenne@CalRecycle; Sellards, Kim@CalRecycle; Yee, Eric@CalRecycle; Yeates, Nevin@CalRecycle; Mindermann, Wes@CalRecycle; Young, Stephanie@CalRecycle
Subject: Tuolumne Disposal Site Discussion
When: Thursday, July 3, 2025 3:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

Hello everyone,
On behalf of Mark, I have some time we are all available to discuss next steps.
Thank you,
PAL

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 240 655 615 751 9

Passcode: 3rX69Fp6

Dial in by phone

+1 916-619-7284,,981884469# United States, Sacramento

Find a local number

Phone conference ID: 981 884 469#

For organizers: Meeting options | Reset dial-in PIN
