

1 Kelton Lee Gibson, Trustee of the Gibson Family
2 Trust Dated June 6,
3 2006

4 _____
5 Address
6 878 Oak Grove Court
7 Ojai, CA 93023
8 _____
9 _____

10 Phone Number
11 805-649-1091

12 Email Address
13 Kgibson878@gmail.com

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES
16

17 SANTA BARBARA CHANNELKEEPER,
18 a California non-profit corporation,

19 Petitioner,

20 v.

21 STATE WATER RESOURCES
22 CONTROL BOARD, etc., et al.,

23 Respondents.

24 CITY OF SAN BUENAVENTURA, etc.,

25 Cross-Complainant

26 v.

27 DUNCAN ABBOTT, an individual, et al.

28 Cross-Defendants.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

INITIAL DISCLOSURES – CODE OF CIVIL PROCEDURE SECTION 842(a)

1. The name, address, telephone number, and email address of the party and, if applicable, the party's attorney.

(a) Name: Kelton Lee Gibson, Trustee of the Gibson Family Trust Dated June 6, 2006

(b) Address: 878 Oak Grove Court, Ojai, CA 92023 (address of affected property, parcel number 011-0-230-205 _____)

(c) Phone Number: 805-649-1091 _____

(d) Email Address: kgibson878@gmail.com _____

(e) Attorney (if applicable): In Pro Per _____

2. The quantity of any groundwater extracted from the basin by the party and the method of measurement used by the party or the party's predecessor in interest for each of the previous 10 years preceding the filing of the complaint.

Year	Amount of Groundwater Extracted:	Method of Extraction:
2019	None has ever been extracted. We are what is referred to in the proposed Physical Solution as "Non Producers", reserving our right to be "New Producers".	N/A
2018		
2017		
2016		
2015		

Year	Amount of Groundwater Extracted:	Method of Extraction:
2014		
2013		
2012		
2011		
2010		

3. The type of water right or rights claimed by the party for the extraction of groundwater.

We claim the right to extract water at a future date through possible drilling of a well as many of our neighbors have done. _____

4. A general description of the purpose to which the groundwater has been put.

General residential use, landscaping, fire protection and other uses TBD. _____

5. The location of each well or other source through which groundwater has been extracted.

N/A _____

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6. The area in which the groundwater has been used.

N/A

7. Any claims for increased or future use of groundwater.

See above.

8. The quantity of any beneficial use of any alternative water use that the party claims as its use of groundwater under any applicable law, including, but not limited to, Section 1005.1 , 1005.2 , or 1005.4 of the Water Code.

N/A

9. Identification of all surface water rights and contracts that the party claims provides the basis for its water right claims in the comprehensive adjudication.

Unknown

10. The quantity of any replenishment of water to the basin that augmented the basin's native water supply, resulting from the intentional storage of imported or non-native water in the basin, managed recharge of surface water, or return flows resulting from the use of imported water or non-native water on lands overlying the basin by the party, or the party's representative or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	None ever
2018	
2017	
2016	
2015	
2014	
2013	
2012	
2011	

1	Year	Quantity of replenishment of water
2	2010	
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5 11. The names, addresses, telephone numbers, and email addresses of all persons
6 possessing information that supports the party's disclosures.

7 (a) Name: Kelton Lee Gibson- See above _____

8 (b) Address: _____

9 (c) Phone Number: _____

10 (d) Email Address: _____

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12 (a) Name: _____

13 (b) Address: _____

14 (c) Phone Number: _____

15 (d) Email Address: _____

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17 (e) Name: _____

18 (f) Address: _____

19 (g) Phone Number: _____

20 (h) Email Address: _____

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22 12. Any other facts that tend to prove the party's claimed water right.

23 Purchase of affected property in 1995 with all available and otherwise vested rights to
24 ground water. _____

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Dated: 6. 7, 2021

Kelton Lee Gibson,
Trustee SIGNATURE
KELTON LEE
[CROSS DEFENDANT NAME]
GIBSON,
TRUSTEE

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VERIFICATION

I have read the foregoing INITIAL DISCLOSURE and know its contents.

☒ I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am _____ of _____, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

☐ I am one of the attorneys of record for _____, a party to this action. Such party is absent from the county in which I have my office, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document(s). I am informed and believe and on that ground allege that the matters stated in it are true.

OJAI

Executed at [CITY], California on 6-7, 2021.

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

Kelton Lee Gibson, Trustee
[TYPE NAME HERE]
KELTON LEE GIBSON
TRUSTEE