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6

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 COUNTY OF LOS ANGELES

9 SANTA BARBARA CHANNELKEEPER,  
10 a California non-profit corporation,

11 Petitioner,

12 v.

13 STATE WATER RESOURCES  
14 CONTROL BOARD, etc., et al.,

15 Respondents.

Case No. 19STCP01176

Judge: Honorable William F. Highberger

VERIFIED INITIAL DISCLOSURES

Action Filed: Sept. 19, 2014

Trial Date: Not Set

16 CITY OF SAN BUENAVENTURA, etc.,

17 Cross-Complainant

18 v.

19 DUNCAN ABBOTT, an individual, et al.

20 Cross-Defendants.  
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Year	Amount of Groundwater Extracted:	Method of Extraction:
2010	Unknown	

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

N/A

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

N/A. We purchase 100% of our water from Casitas Municipal Water Agency

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

n/a

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

n/a

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

Unknown at this time,

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.

Unknown at this time

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.

1 Riparian rights to San Antonio Creek on property.

2  
3 10. The quantity of any replenishment of water to the basin that augmented the basin's  
4 native water supply, resulting from the intentional storage of imported or non-native water in the  
5 basin, managed recharge of surface water, or return flows resulting from the use of imported  
6 water or non-native water on lands overlying the basin by the party, or the party's representative  
7 or agent, during each of the 10 calendar years immediately preceding the filing of the complaint.

Year	Quantity of replenishment of water
2019	Unknown
2018	Unknown
2017	Unknown
2016	Unknown
2015	Unknown
2014	Unknown
2013	Unknown
2012	Unknown
2011	Unknown

Year	Quantity of replenishment of water
2010	Unknown

11. The names, addresses, telephone numbers, and email addresses of all persons possessing information that supports the party's disclosures.

- (a) Name: Tim Carey for Del Cielo LLC
- (b) Address: 22410 Hawthorne #5, Torrance CA 90505
- (c) Phone Number: 310-787-6569
- (d) Email Address: [tim@calvoterguide.com](mailto:tim@calvoterguide.com)
- (e) Name: Casitas Municipal Water Agency
- (f) Address: 1055 N. Ventura Avenue, Oak View CA 93022
- (g) Phone Number: 805-649-2251
- (h) Email Address: [tim@calvoterguide.com](mailto:tim@calvoterguide.com)

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

City of Ventura has no rights to the groundwater due to the fact that cross-defendant does not extract groundwater and has historically relied upon water purchased from Casitas Municipal Water Agency.

The undersigned reserves the right to supplement this disclosure.

Dated: June 1, 2021

  
 \_\_\_\_\_  
 SIGNATURE  
 Tim Carey, Managing Member Del Cielo LLC

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.

Executed at Torrance, California on June 1, 2021.

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

  
\_\_\_\_\_  
Tim Carey, Managing Member, Del Cielo LLC