

HARRISON  
TEMBLADOR  
HUNGERFORD  
& JOHNSON

MINING  
LAND USE  
NATURAL RESOURCES

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April 12, 2017

RECEIVED

APR 12 2017

MENDOCINO COUNTY  
AIR QUALITY  
MANAGEMENT DIST.

**VIA OVERNIGHT & ELECTRONIC MAIL**

Clerk  
Mendocino County Air Quality Management District  
306 E. Gobbi Street  
Ukiah, CA 95482

***Re: Notice of Claim***

Dear Clerk:

On behalf of Brian Hurt, doing business as Grist Creek Aggregates, LLC, please accept the following Notice of Claim pursuant to Government Code section 910 *et seq.*

**NOTICE OF CLAIM**

**Claimant:** Brian Hurt, d.b.a. Grist Creek Aggregates, LLC

**Claimant  
Address:**



**Date of Loss:** October 18, 2016

**Time of Loss:** Unknown

**Place of Loss:** 2.5 miles east of Highway 101, along the north side of Highway 162, between the Highway and Outlet Creek. Assessor's Parcel No. 036-190-26.


**Description of Incident:** County and Mendocino County Air Quality District employees Robert A. Scaglione and Donna Roberts-Nash, interfered by threat, intimidation, and/or coercion with Mr. Hurt's exercise or enjoyment of his rights secured by the United States and California Constitutions in violation of the Bane Act (Civil Code § 52.1). Mr. Scaglione and Ms. Roberts-Nash's actions interfered with Mr. Hurt's rights secured by the United States and California Constitutions.

**Recovery Sought:** Pursuant to Government Code section 910(f), no dollar amount is required if the recovery sought exceeds \$10,000. This case would be an unlimited civil case.

Clerk  
*Notice of Claim*  
April 12, 2017

Should you have any questions concerning the matters discussed herein, please do not hesitate to contact me by telephone at (916)228-4221, or by e-mail at [aguernsey@hthjlaw.com](mailto:aguernsey@hthjlaw.com).

Best Regards,  
HARRISON, TEMBLADOR, HUNGERFORD & JOHNSON

By   
Adam K. Guernsey

cc: Brian Hurt  
Michael Makdisi