LARRY WATTS

James Yeramian

From: Watts, Larry <LWatts@seyfarth.com>
Sent: Wednesday, January 11, 2023 9:55 AM
To: James Yeramian
Cc: Joseph T. Edmiston
Subject: Watts MRCA Bio(90380639.1)
Attachments: Watts MRCA Bio(90380639.1).pdf

Please login my resume in support of my application to succeed Anne Dobkin as the MRCA designated director of the Sullivan Canyon Preservation Association.

If you want references, here are several:

Tanya Stivers, President Sullivan Canyon Preservation Association, stivers@soc.ucla.edu

Anne Dobkin, former MRCA designated director of Sullivan Canyon Preservation Association grnslvs39@gmail.com

Tori Kjer, PLA Executive Director Los Angeles Neighborhood Land Trust tkjer@lanlt.org

Carlyle Hall, environmental lawyer carlylehall@gmail.com

David Ramey, DVM President Los Angeles Equine Advisory Committee ponydoc@pacbell.net

Carolyn Jordan, Chair Brentwood Community Council cjordan@glaserweil.com

Michelle Newman Ravich, Executive Director Ahead With Horses aheadwithhorses@yahoo.com

If you have question or require further information.

T. Larry Watts | Senior Counsel | Seyfarth Shaw LLP
2029 Century Park East | Suite 3500 | Los Angeles, California 90067-3021
Direct: +1-310-201-5287 | Mobile: +1-310-864-6475 | Fax: +1-310-282-6987
lwatts@seyfarth.com | www.seyfarth.com

T. LARRY WATTS

Personal Background

I was born in Los Angeles and grew up from age 7 on an orange grove in Orange County, when there still were such things there. I was an active member of 4-H, raising chickens, cattle and growing vegetables. I attended a small country school (there were 8 kids in my 8th grade class). I graduated Fullerton Union High School in 1956, and entered Claremont McKenna College. In 1959 I attended the London School of Economics, afterwards I returned to California and received my B.A. from Claremont McKenna College in 1960.

I was married in 1960 and commissioned a Second Lieutenant in the United States Marine Corps. I served on active duty with the Fleet Marine Force Pacific as an artillery officer in a 105 howitzer battery with the First Marine Brigade. On completing my tour of duty in 1964 my wife and I moved to Palm Springs, California where I worked for a family business until 1969.

In 1969 I entered the UCLA School of Law, where I was a member of the UCLA Law Review. I began the private practice of law with Latham & Watkins in Los Angeles in 1972. I am currently semi-retired as a Senior Counsel with Seyfarth Shaw LLP in Century City.

Relationship with the Sullivan Canyon Site

My wife and I are horse people and moved to Sullivan Canyon in 1972 because it was a horse community. There was an approximate 8 acres site owned by LAUSD near the entrance to the canyon that was neglected, run down and a night time hangout for teenagers partyers. We were among a group of neighbors and horse enthusiasts who that year formed Sullivan Canyon Riders (SCR), to encourage equestrian sports. SCR leased the land from LAUSD installed perimeter rail fencing, and several arenas and other equestrian amenities.

Following the establishment of the Santa Monica Mountains Conservancy (Conservancy) in 1979, we supported its decision to exercise its right to acquire surplus public lands in the Santa Monica Mountains, including the Sullivan Canyon and Temescal Canyon LAUSD sites. After the LAUSD opposed the Conservancy's decision, I researched the history of the property and Sullivan Canyon.

I discovered that the site's association with equestrian sports began in about 1904 when R.C. Gillis built a stable on it for his daughter Adelaide, a competitive rider. I also learned that the cross country phase of the Three Day Equestrian Event at the 1932 L.A. Olympic Games crossed the property. In about 1939, Cliff May, father of the California Ranch House architectural style began acquiring land in Sullivan Canyon. He told me of his plans to build a community riding field on the land leased by SCR. Those plans were interrupted by World War II. Following the war Liz Whitney Tippet, the famous horsewoman and race horse owner and breeder, bought the property. She built a horse farm and held periodic horse shows there until it was condemned in 1961 by LAUSD to build an elementary school.

After the Conservancy expressed interest in the site, LAUSD attempted to undo its action declaring the land surplus. Other community members and I thereafter worked to build support

for the Conservancy's efforts. I traveled to Sacramento and met with members of the Senate and Assembly in support of the Conservancy's position. Over a period of years various legislative compromises were reached that led to the Conservancy acquiring some surplus LAUSD land, including in Temescal Canyon, but not the Sullivan Canyon site.

From about 1983 onward LAUSD explored various options for selling the land and the community continued to encourage LAUSD to dispose of the land in a way that would preserve its historic equestrian recreational use. At one point, LAUSD sought an amendment to the City of LA's General Plan that would allow it to change the zoning and subdivide the property for residential development. That effort failed and in the late 1990's LAUSD decided to sell the site "as is."

Throughout this period of uncertainty concerning the future of the property, SCR continued to operate a community riding facility on the property. In response to LAUSD's decision to sell the site, the community formed a new charitable entity, Sullivan Canyon Preservation Association, Inc. (SCPA), to raise money to purchase the site. SCPA was successful and acquired the land in 2003. In doing so it granted a perpetual conservation easement over the property to the Mountains Recreation and Conservation Authority (MRCA).

I was an initial director of SCPA and served as its president for several years. The MRCA has the right to designate one director to the SCPA board. Anne Dobkin, the current MRCA designated director is retiring. Since my term as a regular SCPA director will shortly terminate, I am applying to the MRCA to designate me is its designee on the SCPA Board.

Other Civic/Community Activities

Los Angeles Equine Advisory Committee (LAEAC)-- The LAEAC was established by the Los Angeles City Council in 2009 to advise the Mayor, City Council and City Departments on horse related issues. I am an appointed LAEAC board member and its Recording Secretary.

Brentwood Green at Brentwood Science Magnet School (Brentwood Green)-- Brentwood Green was established in 1997 as a 501(c) (3) charitable organization to address the lack of public parks in the Brentwood area of Los Angeles by creating a beautiful campus and playground at Brentwood Science Magnet School for students and faculty that would be open to the community after school, weekends, summers and holidays. I was an organizer of Brentwood Green and continue to serve on its board.

People for Parks (PFP)-- Since 1989 PFP worked to revitalize run down and crime-ridden parks that had suffered years of neglect and to increase park access by improving the built environment for a more livable Los Angeles. Inspired by Brentwood Green, PFP developed its Community School Parks (CSP) concept. The CSP program is a way to expedite creating new public recreational space, particularly in densely populated low income urban neighborhoods, by opening public schools to the public during non-school hours and on weekends, summer break and holidays. I was asked to join the PFP board through my involvement with Brentwood Green and served as PFP president for about 5 years. During my tenure PFP opened 12 CSPs to provide needed access to park space for children, families, and elderly residents to enjoy together in

Koreatown, Pico Union, West Lake, Central Alameda, South LA and East Hollywood. In 2019 PFP merged with the Los Angeles Neighborhood Land Trust, which continues the CSP program and I serve on its Advisory Board.

Brentwood Community Council (BCC)-- The BCC is comprised of representatives from 28 stakeholder groups within the Brentwood community, including homeowners, residents of multi-family units, businesses, religious, cultural, educational and civic organizations. BCC assists and serves as an advisory body to all federal, state, and local governmental entities and persons, by making investigations and recommendations on issues relating to Brentwood. I have served as BCC Chairman, Secretary and am currently its Vice Chairman.

Westside Regional Alliance of Councils (WRAC)-- WRAC is a cooperative regional coalition made up of 14 neighborhood and community councils on the Westside of Los Angeles. WRAC meets monthly to discuss matters of regional interest, address major issues that impact the Westside, and ask member councils to consider positions that are recommended by the WRAC board. I have served as secretary and as vice-chairman of WRAC and am currently the BCC's alternate WRAC representative.

James Yeramian

From: MSB <mindy.beardsley@gmail.com>
Sent: Tuesday, January 17, 2023 3:50 PM
To: James Yeramian
Subject: Fwd: watts
Attachments: watts mrca ltr signed.pdf

Dear James,

It has been brought to my attention that Larry Watts is being considered for a permanent position on the SCPA board on behalf of the MRCA.

I would like to submit the attached formal letter stating personal, first hand observations as to why I feel he should not hold this position.

Thank you for your consideration.

Mindy Beardsley
SCPA Member
310.614.8384

To Whom it May Concern:

- I am writing this email as I feel Larry Watts would be a liability as a permanent board member for the SCPA/MRCA position. I have been part of the Sullivan Canyon community for many years as both a horse owner and friend to many Canyon residents and I have known Larry for a majority of these years. I write to you from the perspective of a long-time member of the SCPA riding community. I feel that Larry is widely viewed as a contentious member of the community, somewhat aggressive and most importantly, lacks integrity - a quality I would think any board would want its directors to possess.

I have extensive personal experience with Larry as I have boarded my horse close to his property for a decade, and more recently, our horses have stabled together in adjacent stalls. I have observed Larry to be aggressive and rude to people in our community, especially when his ideas are challenged. He has also inappropriately shared information about an ongoing issue that was only meant for the members of the SCPOA ("Sullivan Canyon Property Owners Assn.") which in my view, calls into question both his judgement and integrity.

Larry's actions are numerous, so I have listed only a few examples below:

Integrity:

• Larry lacks integrity, the very kind of integrity that board members value in a candidate. In the years he spent as an SPCA board member, he consistently shared confidential information with me, such as those written in emails and private conversations with SCPA Board members.

• Currently, there is an on-going issue on Old Ranch Road, the homeowners are involved in a dispute that may evolve into litigation. Larry has disclosed information to me, personally that no one should be privy to. Larry proceeded to print a copy of private emails between neighbors and an attorney, and gave those to me. He then gave me other correspondence regarding the same issue.

Is this appropriate behavior for a board member? Particularly for a potential lifetime appointee who would be part of a highly visible organization?

Anger/Aggressive/Misogynist:

- As mentioned, Larry and I share a stable together, which means we observe each other's horsemanship. When Larry sees me engaging in care and practices with my horse which he doesn't agree with, he's incredibly demeaning and condescending.

- Larry is inconsiderate and he does not follow basic rules. For example, cleaning up after your horse is the first rule of a good stable mate (it's equivalent to cleaning up after your dog on a hiking trail), and Larry rarely cleans up the manure of his horse - he expects others to do it for him. To me, this speaks volumes that- quite simply- Larry doesn't feel rules apply to him. On that note, when I have asked him to please do his part, he's become very angry and yells at me, using expletives that I will not repeat here.

- There are other times he has been aggressive and angry, but more than I can put into this communication.

I thank you in advance for taking the time to read through my concerns.

Sincerely,

Mindy Beardsley

Mindy Beardsley

January 19, 2023

Re: Larry Watts

To MRCA & SMMC,

I think your board of directors should know about my personal experiences with Larry Watts, who is seeking to be awarded the Santa Monica Mountains - MRCA seat on the SCPA Board.

In my opinion, based on extensive interactions with him, Larry has an anger management problem. His lack of self-control is in my opinion, a serious problem. In my experience and based on observations, when Mr. Watts does not get his way, he becomes aggressive and intimidating. He yells, becomes visibly angry, slamming things, and leading to actual physical outbursts. I have observed this conduct directed often at women.

When Mr. Watts learned that I had reported his misconduct to two SCPA directors in 2008, soon after he assaulted me, and then retaliated against me by convincing a board to revoke my privileges on the SCPA site. He did this despite a SCPA Open Door Policy to protect whistleblowers. He then went on further, interfering in all manners with my well-being and economic interests. His actions against me, and repeated failed attempts to mediate the matter in good faith, resulted in my filing, and parties then engaging in a protracted lawsuit. The matter against the SCPA was ultimately settled. The actionable conduct I share with you is set forth in a Complaint filed on 25-Apr-2011, and a First Amended Complaint filed on 17-Jan-2012 as Case # 122380 in the LA Superior Court (copy of pages 3 – 10,"Background" attached to my email) Additionally, during that lawsuit, Watts filed motions to substitute Seyfarth Shaw (the firm where he is a law partner) in place of the SCPA insurance company legal defense firm assigned to the case. My impression was that this benefitted Mr. Watts financially, as a partner of Seyfarth Shaw.

Although, I am informed and believe that the SCPA issued a letter to Watts about his misconduct and issued a fine, Watts maintained his power. Given my own experiences, I am concerned that Watts is once again trying to remain in a position of power by way of the MRCA and SMMC giving him a seat on the SCPA Board without a term limit.

The MRCA is a good organization with an admirable mission, and in my opinion deserves a better representative.

Thank you.

Diane M. Dufau

MRCA Board of Directors

January 18, 2023

Dear MRCA Board,

I recently learned that Larry Watts is submitting his name for consideration for the lifetime MRCA / SCPA board of directors position. I thought it might be helpful to share my experience with Mr. Watts as you consider his appropriateness for this position.

Back in 1995 - 1996, there was a horse riding instructor at Sullivan Canyon named Mary Bullock who fell ill with cancer. Ms. Bullock asked me to help her with her students while she went through an extended treatment for cancer, and I did so, with a friend Connie Von Briesen. In doing so, we seemed to have annoyed Mr. Watts, and the trainer he worked with closely. It was my impression at the time that they wanted Mary Bullock to lose her students, and I was adding some students to her roster.

Also at that time, and with Ms. Bullock's consent, I began working on a program for inner city kids (similar to the Compton Jr Posse of today) to come to Sullivan Canyon. When Mr. Watts learned of my plans, he vociferously and aggressively objected to the program, saying that he *"didn't want that in his backyard"*. He came at me to the point of assault, up close, waving his arms, screaming red-faced with the spray of his words hitting me and Connie, in the face. He was abusive, unhinged and it was, frankly, terrifying to us. This did not happen just once, it happened several times.

Mr. Watts acted very threatened by the idea of this program - the idea that young riders from underprivileged backgrounds and a different area of LA who may share the same passion for horses, might now have access to this wonderful resource in his neighborhood. Soon after, legal actions were filed in court to have me removed from the site (Case # SC040669). I was not in the position to fight a big legal battle (Mr. Watts is an attorney), but I will never forget his aggressive and abusive conduct directed at two young women who were only trying to do good, nor will I forget his contempt for the program I wanted to bring to Sullivan Canyon.

In my opinion his behavior demonstrated clear anger management issues, not to mention an extremely elitist attitude - quite the opposite of how I imagine the values of the MRCA to be. I kindly request that you take this information into consideration as you move forward with your evaluation of Mr. Watts, and hopefully other candidates for this permanent position.

Sincerely,

Devilyn Wallin

COPY

McNICHOLAS & McNICHOLAS, LLP
John P. McNicholas, Esq. CSB No. 33530
Jennifer Ostertag, Esq.,CSB No. 261246
10866 Wilshire Blvd., Suite 1400
Los Angeles, California 90024
Tel: (310) 474-1582
Fax: (310) 475-7871

Attorneys for Plaintiff
Diane Dufau, an individual

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DIANE DUFAU, an individual,

Plaintiff,

vs.

THE SULLIVAN CANYON PRESERVATION ASSOCIATION, a California non-profit public benefit corporation; THOMAS LAURENCE WATTS also known as LARRY WATTS, an individual, and a director or officer of THE SULLIVAN CANYON PRESERVATION ASSOCIATION; PATRICIA V. MAYER, an individual, and a director or officer of THE SULLIVAN CANYON PRESERVATION ASSOCIATION; and DOES 1 through 100,

Defendants.

Case No.: SC112380
[Assigned for all purposes to the Hon. Richard A. Stone, Dept. X]

FIRST AMENDED COMPLAINT FOR DAMAGES FOR:

(1) **DEFAMATION BY SLANDER**
(2) **INTENTIONAL INTERFERENCE WITH IMPLIED IN FACT CONTRACT**
(3) **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
(4) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
(5) **BREACH OF IMPLIED CONTRACT FOR CONTINUED EMPLOYMENT**
(6) **BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING**
(7) **VIOLATION OF FAIR EMPLOYMENT AND HOUSING ACT, GOVERNMENT CODE, SECTION 12900, ET SEQ.**
(8) **WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**
(9) **VIOLATION OF UNRUH CIVIL RIGHTS ACT, CIVIL CODE, SECTION 51**
(10) **ASSAULT**
(11) **NEGLIGENCE**

///

Plaintiff alleges on information and belief as follows:

1. Plaintiff, DIANE DUFAU, is, and at all times relevant herein was, an individual residing in Los Angeles County, California.

2. Plaintiff is informed and believes, and based thereon alleges, that defendant, THE SULLIVAN CANYON PRESERVATION ASSOCIATION ("SCPA"), is a California non-profit public benefit corporation, with its principal offices located at 1640 Old Ranch Road, in Los Angeles, California 90049.

3. Plaintiff is informed and believes, and based thereon alleges, that defendant, THOMAS LAURENCE WATTS also known as LARRY WATTS ("WATTS"), is an individual, who resides in Los Angeles County, California. Plaintiff is further informed and believes and based thereon alleges that this defendant, at all times relevant hereto, is and was the President of SCPA, and also served as a member of the Board of Directors. Plaintiff is informed further that WATTS is, and has been, a practicing lawyer in Los Angeles.

4. Plaintiff is informed and believes, and based thereon alleges, that defendant, PATRICIA V. MAYER ("MAYER"), is an individual, who resides in Los Angeles County, California. Plaintiff is further informed and believes and based thereon alleges that this defendant, at all times relevant hereto, was a member of the Board of Directors of SCPA. Plaintiff is informed further that MAYER is, and has been, a practicing lawyer in Los Angeles. Plaintiff is informed further that MAYER serves, and has served, as the SCPA's Chief Financial Officer, as well as head of membership.

5. Plaintiff is informed and believes and, based thereon alleges, that defendants designated as DOES 1 through 10 are and were officers of SCPA and/or members of the Board of Directors of SCPA, who participated in, approved or ratified the wrongful acts against Plaintiff as alleged herein.

6. Plaintiff is ignorant of the true names and capacities of defendants sued as DOES 1-100, inclusive, and therefore sues these defendants by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and based thereon alleges that each of the defendants designated as a DOE is responsible in some manner for the wrongful conduct referred to and thereby proximately caused injuries and

damages to Plaintiff as herein alleged.

7. Plaintiff is further informed and believes and based thereon alleges that, at all times herein mentioned, each of the defendants, including those designated as DOES, was the agent, employee, and/or representative of each of the remaining defendants, and in doing the things hereinafter alleged, was acting within the course and scope of such agency and employment. Although Plaintiff is alleging that each defendant, including DOE defendants, was acting within the course and scope of their agency and employment, such allegations shall not operate to bar Plaintiff from pursing claims for individual tortious conduct against each defendant, inclusive of DOES, because for each wrongful act alleged herein, each defendant, including DOES, knew their conduct to be wrongful but continued to perform said wrongful acts despite this knowledge.

BACKGROUND

8. The SCPA's horseback riding facility is located in the City and County of Los Angeles between Old Oak Road and Old Ranch Road on property condemned by the Los Angeles Unified School District for use as a school site in the 1960's. Ultimately, the school district did not build a school. Sometimes between 1970 and 1980, WATTS formed a non-profit organization called the Sullivan Canyon Riding Club and arranged a lease agreement with the Sullivan Canyon Riding Club and the Los Angeles Unified School District for the eight (8) acre site in Sullivan Canyon for $1,500.00 per month. The Sullivan Canyon Riding Club used the land as a horse riding facility which was controlled primarily by the WATTS family. WATTS' wife, Francis Watts, also known as Happy Watts, collected dues from all the riders and kept a closed set of books. The horse riding facility had great appeal and potential because it was the only place of its type located in West Los Angeles. People who lived on the Westside could enjoy horseback riding and related activities in their own backyard and did not have to drive outside West Los Angeles. The proximity of the site allowed horseback riding, for some, to become a daily after school activity for children who lived in the area, and for their parents. Sullivan Canyon was considered a "private playground" for residents who lived in the area.

9. In 2000, the defendant SCPA was formed by homeowners to save the horse riding facility from being sold by the school district for development, and purchased the Sullivan Canyon

equestrian site. Plaintiff is informed and believes and based thereon alleges that the stated charitable mission of the SCPA is to maintain open space in the Sullivan Canyon area of Los Angeles for an equestrian use.

10. Plaintiff, at all times relevant hereto, was a trainer/instructor who provided instruction for horseback riding, horse training, and proper care and maintenance of horses, initially for the Sullivan Canyon Riding Club, and then SCPA once it became the owner of the Sullivan Canyon equestrian facility.

11. Consistent with an equestrian use, the SCPA promulgated rules and regulations controlling membership, riding privileges, guest privileges, and rules for trainers who rendered training, grooming, and boarding services, relative to the equestrian uses of SCPA's property. Relevant herein, training horses and providing instruction to members and guests were activities incidental to and consistent with SCPA's business of owning and operating an equestrian facility. As such, SCPA supervised, controlled, directed, and otherwise monitored the conduct of its trainers, including Plaintiff herein. SCPA also derived significant revenue from members, guests, and equestrian related uses of the property.

12. Plaintiff is informed and believes and based thereon alleges that trainers, including Plaintiff herein, provided a direct financial and non-financial benefit to SCPA and its members, inter alia, because the ability to have onsite trainers available to its members and guests brought substantial added value and demand for the site, as well as ensuring and increasing the safety skills and equestrian knowledge of the SCPA riders. In addition, Plaintiff brought numerous high profile, well-respected clients who paid substantial sums of money to SCPA to gain access and participate in equestrian activities with Plaintiff at the Sullivan Canyon site, thereby providing SCPA with substantial good will, added value, and demand for the site.

13. At all times relevant hereto, before the wrongful conduct alleged herein, Plaintiff enjoyed a good living training horses, providing horse riding instruction, boarding and grooming horses, and other related equestrian services. Plaintiff had developed and cultivated a substantial client base, as well as substantial good will throughout her years, as she had first started riding at the Sullivan Canyon Riding Club in or about 1994. Plaintiff became a trainer at the Sullivan Canyon

Riding Club in approximately 1998 and was one of the very first trainers to train young riders.

14. At all times relevant herein, defendants, SCPA, WATTS, MAYER, and DOES, were fully cognizant of and understood and appreciated the business relationships that Plaintiff had with her students, the parents of her students, clients, customers, horse owners, horse breeders, horse boarders, and members and guests of SCPA, as well as other instructors and trainers in the profession. These defendants further understood and appreciated that the business of horse training and riding instruction, and related equestrian employment, is developed and maintained by reputation. These defendants also knew that a good reputation was of paramount importance as horse riding could be dangerous to adults, not to mention young children. Based on the high quality of Plaintiff's training, instruction, riding and horse ownership related services, Plaintiff had ongoing business relationships and standing appointments with customers and a steady stream of new referrals. From 1998 through most of 2008, Plaintiff's livelihood focused around the Sullivan Canyon/SCPA equestrian facility.

15. In January 2008, SCPA's rules and regulations required that only members and properly registered guests could ride at the equestrian facility. SCPA, WATTS, MAYER, and DOES, throughout Plaintiff's tenure, emphasized the importance of having only members in good standing and their duly admitted guests, use the equestrian facility. One of the reasons advanced by these defendants was that SCPA had to have accountability for risk management purposes for those riding at the facility. The member who owns or is in control of the horse ridden by the guest is responsible to see that a release of liability form is on file, and rules require that a guest pass is completed each and every time a guest rides. In addition, guest passes and membership dues could amount to substantial sums of money, and by not collecting such sums, it could harm SCPA's continued livelihood as well as the public's purse, as SCPA was tax-exempt and financed by members of the public.

16. In January 2008, consistent with Plaintiff's understanding of SCPA's "open door" rule violation reporting policy, Plaintiff submitted a written notice to the Board of Director's complaint liaison, Karen Stabiner, as well as Mary Sweeney, advising that WATTS had been allowing a non-member, Olivia Slavin, to ride one of WATTS' horses at the equestrian facility in violation of SCPA's rules and regulation. Plaintiff further reported that the unauthorized non-member use of the facility continued for a period of approximately ten (10) months. It should be noted that in the interim,

Plaintiff had reported the rule violation to SCPA's site manager, Hilary Watts, but Ms. Watts ignored Plaintiff's reports of the rule violations. (Not coincidentally, Ms. Watts, is the daughter of the President, defendant WATTS herein.) Ms. Sweeney assured Plaintiff that she would be protected from harassment or retaliation within the SCPA, even though she was reporting violations of the SCPA President and his daughter. Ultimately, the SCPA Board of Directors admonished WATTS, WATTS acknowledged his rule violation, and paid a fine for his conduct. However, the fine paid by WATTS was substantially discounted from what SCPA's rules required.

17. After Plaintiff reported the rule violation, defendant WATTS did everything in his power to cause Plaintiff to lose her reputation, and consequently her training and riding privileges at SCPA and to destroy her ability to work as a trainer in Sullivan Canyon, or to otherwise derive any income at all from SCPA or its members. WATTS and DOES were committed to carrying out whatever campaign was necessary so that Plaintiff could not make a living as a horse trainer or riding instructor, or in any equestrian capacity. It should be noted that WATTS was openly adverse to Plaintiff well before he learned about Plaintiff reporting Ms. Slavin's and WATTS' abuse of the SCPA guest policy. Plaintiff is informed and believes and based thereon alleges that before March 2008, WATTS was critical of Plaintiff because Plaintiff frequently constructively criticized Hilary Watts' job performance because she failed to keep up to date wait lists, did not strictly enforce insurance, guest pass, and riding release policies uniformly or consistently. Plaintiff also raised the issue that Ms. Watts did not treat all trainers equally, nor consistent with SCPA policy whereby all new clients were to be provided a list of trainers without editorial comment or recommendation. Plaintiff is informed further that after WATTS learned of Plaintiff's comments and concerns about his daughter, Hilary Watts, WATTS changed his attitude toward Plaintiff and became openly adverse to Plaintiff before March 2008.

18. Plaintiff is informed and believes that WATTS enlisted MAYER to engage in this scheme to destroy Plaintiff's reputation, and ability to earn a living. Plaintiff is informed further that MAYER voluntarily and knowingly agreed to engage and participate in WATTS and DOES' wrongful and injurious plan to harm Plaintiff.

19. The alliance of WATTS and MAYER and DOES ultimately caused SCPA to violate its

implied contract with trainers, like Plaintiff, by disregarding its own "open door" policy, which purported to protect users, SCPA officers, employees, and trainers, from retaliation or harassment in response to disclosures made to management or to the Board of Directors. Instead of following its own policies, WATTS and MAYER used the Board to mount a targeted campaign against Plaintiff.[1] SCPA, WATTS, MAYER and DOES looked for anything with which they could discipline Plaintiff, treated her differently and more harshly than the others, and forced rules against her that were not applied to others, and affirmatively sought out any negative information that they could find. They did all of this after Plaintiff, believing she was under the protection of the "open door" policy, made whistle blower-type disclosures to the Board. As set forth in more detail below, those disclosures were met with termination.

20. On the other hand, WATTS' rule violation constituted a breach of WATTS' duty of good faith and fair dealing to SCPA, as he used his position as President and Board Member for his own personal benefit and for the benefit of his family. SCPA's rules did not contain any exceptions or special treatment for officers or board members or family members. Everyone was required to follow the rules and the rules were supposed to be carried out and enforced uniformly. However, WATTS was incredulous that Plaintiff had the audacity to report his rule violations and made it very clear to Plaintiff, and to others, that he would do whatever it took to make sure that Plaintiff could not train, work or ride at the SCPA equestrian site, and if he had his way, anywhere ever again.

21. Consistent with his promise, less than a month after Plaintiff reported WATTS, in April 2008, WATTS, while on a large horse, physically charged upon Plaintiff while she was standing on the grounds of SCPA. WATTS proceeded to yell and scream at Plaintiff claiming that she was going to be "In for it" while simultaneously waiving a 42 inch horse whip in Plaintiff's face. He persisted by yelling, "Your days are numbered!" Plaintiff pleaded and asked WATTS to lower his voice and for him to stop with the whip as he was scaring and humiliating Plaintiff. WATTS continued to torment Plaintiff by circling her with his horse at very close range. Others observed WATTS' conduct.

---

[1] Plaintiff is unaware of the involvement of all board members relative to the wrongful actions taken against her and thus reserves her right to amend this complaint as additional information is obtained.

Ultimately, WATTS backed down but only after he made one more threat while waiving the whip: "Keep your nose down and mouth shut!"

22. On or about September 11, 2008, Plaintiff received a letter from defendant WATTS on behalf of SCPA stating that effective October 15, 2008, Plaintiff's SCPA's training privileges were being revoked. No specific verifiable reasons for the revocation were listed. Plaintiff was denied due process as Plaintiff never had an opportunity to confront the accusers or defend against the allegations that were leveled against her.

23. As if the revocation of Plaintiff's training privileges was not enough, WATTS, MAYER and DOES consciously pursued a course to ensure that Plaintiff would not be able to earn a living, not only at SCPA, but at any other equestrian facilities. Since her termination, Plaintiff has learned that SCPA, WATTS, MAYER and DOES made statements to Plaintiff's clients and customers, and other trainers, that Plaintiff "... is a drug addict," "... is a loser," and "... is an alcoholic." The foregoing statements were not true. Plaintiff is further informed and believes and based thereon alleges that WATTS, MAYER and DOES made these false representations with the specific intent to cause Plaintiff's customers, clients, or vendors not to do business with her again and to otherwise destroy her livelihood.

24. After Plaintiff's ability to train at SCPA was revoked, Plaintiff was concerned for her students, as most of her students had worked with her for four (4), five (5), and even six (6) years. So Plaintiff made arrangements to have a trainer friend of hers teach Plaintiff's students. Once SCPA, WATTS, MAYER and DOES learned that Plaintiff's friend was training her students, these defendants contacted and threatened the trainer. These defendants advised the trainer that Plaintiff better not receive any money from the trainer for the student referrals, because if Plaintiff did receive even one penny of income, that trainer should be concerned about his ability to be able to continue to train at SCPA. At the time these statements were made, there were no rules, regulations or prohibitions governing the financial relationships that trainers make with clients, vendors or other professionals.

25. SCPA, WATTS, MAYER, and DOES continued in their campaign to destroy Plaintiff's business and livelihood. These defendants unilaterally changed SCPA's rules and

regulations, and selectively enforced rules and regulations, for the specific purpose of targeting Plaintiff. In this regard, after October 2008, Plaintiff is informed and believes that these defendants contacted Plaintiff's customers and professional colleagues and fished for information by asking questions, such as "Does she [Plaintiff] owe you money?" "Have you ever seen her doing drugs?" "Have you ever seen her drinking?" These questions, in and of themselves, are broadcasting just exactly what the defendants wanted, which was for the people being asked the questions to think that Plaintiff was a drug addict, alcoholic, unethical business person, or that Plaintiff otherwise engaged in behavior that would not be acceptable to Plaintiff's customers, clients, and vendors.

26. SCPA, WATTS, MAYER and DOES, and each of them, discriminated, harassed and retaliated against Plaintiff for reasons and in a manner contrary to public policy, on a pre-textual basis. In addition, Plaintiff is informed and believes and based thereon alleges that these defendants revoked Plaintiff's training privileges because of her presumed substance and alcohol abuse, which they contend was supported by Plaintiff's runny nose, watery eyes and hand tremors. The reality is that Plaintiff is a horse trainer and riding instructor with allergies and she has had a medical condition since elementary school which causes her hand to shake. After defendants wrongfully revoked her training privileges, SCPA, WATTS, MAYER and DOES then went about intimidating, harassing, vexing and annoying Plaintiff with the goal of interfering with her riding privileges. Fortunately, Plaintiff was able to maintain her riding privileges so she could still earn some money running, walking and grooming client horses. However, because defendants presumed Plaintiff was a substance abuser and alcoholic, SCPA, WATTS, MAYER and DOES frequently followed Plaintiff to and from her barn and stables, photographed her on and off SCPA's site, cross-examined Plaintiff's children students to learn information about Plaintiff and her horses, confronted and humiliated Plaintiff about her whereabouts and speech at the SCPA facility, and they went so far as to suspend Plaintiff's riding privileges for a two (2) week period. The suspension was initially stayed, but it was ultimately carried out. All of the foregoing created a hostile work environment, and an environment that was riddled with hostility, animosity and retaliatory actions against Plaintiff.

27. Although SCPA never provided Plaintiff timely with the reasons for her termination, in pre-litigation discovery, Plaintiff finally learned that she was terminated primarily on defendants'

belief that she was a presumed alcoholic and drug addict. Plaintiff responded to each charge with documentary and testimonial evidence that each claimed ground for termination was false or incorrect. As it turns out, there was never any evidence developed or provided to Plaintiff that showed that SCPA, WATTS, MAYER, and DOES conducted any real or good faith investigation to determine truly whether Plaintiff had violated SCPA rules and should be terminated.

28. What really transpired was that SCPA, through WATTS, MAYER and DOES, retaliated against Plaintiff because WATTS took the "open door" report of Plaintiff personally, as a personal affront. WATTS admitted that the report embarrassed him. After all, WATTS was the President, a founder of the Sullivan Canyon Riding Club and the SCPA, and a lawyer by trade. WATTS used his position as President of SCPA to pursue a course of action that minimized his fragrant violations and resulted in Plaintiff's termination and loss of reputation. WATTS' personal feelings do not, in any way, justify his or any other defendant's conduct towards Plaintiff.

TOLLING AGREEMENT BETWEEN THE PARTIES

29. At all times relevant hereto, on or about September 11, 2009, SCPA, including its officers and directors and all named defendants, and Plaintiff entered into an agreement tolling the statute of limitations. The statute of limitations period is to start running upon ten (10) days written notice. Written notice was given to Plaintiff on April 19, 2011, and any action to be filed within ten (10) days to be timely. Plaintiff has timely commenced this action.

FIRST CAUSE OF ACTION

(For Defamation against defendants SCPA, WATTS, MAYER and DOES 1-100.)

30. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 29, as if set forth herein in full.

31. Plaintiff is informed an believes and based thereon alleges that before and after her training privileges had been revoked, SCPA, WATTS, MAYER and DOES, and each of them, knowingly made untrue verbal statements about Plaintiff to Plaintiff's clients, customers, vendors and other trainers, as set forth in paragraphs 23 and 25 above.

32. All of the statements as they pertain to Plaintiff are false.

33. These statements were defamatory because they exposed Plaintiff to hatred, contempt,

ridicule, and caused and continue to cause her to be shunned or avoided and said statements have a tendency to injure and did so injure Plaintiff in her occupation as a horse trainer and riding instructor, horse groomer and boarder, among other aspects of her profession. The words spoken carried a defamatory meaning because no matter how anyone understood the words, all the words conveyed the meaning that Plaintiff was a drug addict, alcoholic, and a loser, and otherwise was unfit to carry-on a professional relationship. Further, the words spoken conveyed a further message that Plaintiff was unfit and posed a danger to her clients and others at the facility.

34. As a proximate result of publication of the above referenced words, Plaintiff has suffered loss of and injury to her reputation, shame, embarrassment, shock, and mortification all to her general and special damage. As a result, Plaintiff has incurred, and will continue to incur, medical expenses, and has lost income and will continue to lose income in the future. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

35. The above described statements were published by SCPA, WATTS, MAYER and DOES with malice, oppression and fraud in that defendants intentionally made the false statements, when in fact they knew said statements to be false, but yet disregarded this knowledge because SCPA, WATTS, MAYER and DOES desired to intentionally cause Plaintiff harm to her person, reputation and profession. The individual defendants carried on the campaign to make false statements about Plaintiff under the authority of SCPA, with SCPA's knowledge and consent. As such, all defendants' wrongful, malicious, fraudulent, and oppressive conduct, as alleged herein, warrants the imposition of exemplary and punitive damages.

SECOND CAUSE OF ACTION

(For Intentional Interference with Implied in Fact Contract against defendants SCPA, WATTS, MAYER and DOES 1-100.)

36. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 35, as if set forth herein in full.

37. From 1998 to October 15, 2008, Plaintiff was gainfully employed as a horse trainer and riding instructor performing the services set forth herein in paragraphs 10, 13, and 14, at SCPA's equestrian facility. At said time, Plaintiff had ongoing business relationships and standing

appointments with her clients, customers, students and members of SCPA. The services that Plaintiff provided were part of the continued course of conduct and personal understanding between Plaintiff and her clients, customers, students, and members of SCPA. For example, Plaintiff had standing appointments whereby she would meet her students on site on the same days each week, at the same times, week after week, and these weeks often turned into years. Plaintiff had students that she taught, and was continuing to teach for four (4), five (5) and six (6) years. Similarly, Plaintiff had ongoing relationships to board and groom horses that were for terms in excess of months at a time. These business relationships with her clients, customers, students, and members of the SCPA were based on the existence of implied-in-fact contracts, which during the course of the business relationships, were enforceable between the parties.

38. At the time defendants SCPA, WATTS, MAYER and DOES, and each of them, engaged in the wrongful conduct as alleged herein in paragraphs 17, 18, 19, 21, 22, 23, 24, and 25, they were fully cognizant of and understood and appreciated the implied-in-fact contracts that Plaintiff had with her clients, customers, students, and members of SCPA and Plaintiff's status as a trainer at SCPA.

39. The wrongful conduct alleged above in paragraphs 17, 18, 19, 21, 22, 23, 24, and 25, was intentional and designed by defendants SCPA, WATTS, MAYER and DOES to disrupt the above described economic relationship and implied-in-fact contracts between Plaintiff and her clients, customers, students, and members of SCPA and was performed and carried out by these defendants with the intent to harm Plaintiff financially and to induce Plaintiff's clients to end their relationship with Plaintiff. In addition, the wrongful conduct as alleged herein was designed to cause plaintiff to suffer economic loss by preventing her from rightfully being able to perform services for clients and customers as a trainer at SCPA.

40. The wrongful conduct alleged above at paragraphs 17, 18, 19, 21, 22, 23, 24, and 25, was wrongful by a legal measure other than the wrongful interference itself, to wit: these defendants made knowingly false statements to Plaintiff's client and customer base, as set forth in the First Cause of Action, which is incorporated herein. Further, these defendants retaliated against Plaintiff for reporting WATTS' breach of fiduciary duty as set forth in paragraph 16. SCPA, WATTS, MAYER,

and DOES' retaliatory conduct, which is independently wrongful, is set forth in the Background section of this pleading which is incorporated herein. In addition, these defendants manufactured false reasons to terminate Plaintiff's training privileges, the actions of which satisfy the factual predicate necessary to support claims of breach of employment contract, statutory retaliatory wrongful termination for reporting workplace abuses among other grounds pursuant to Government Code, sections 12926.1 and 12940, et seq., and wrongful termination in violation of public policy, in addition to other independently wrongful acts. The wrongful revocation of privileges and publication of slanderous statements regarding Plaintiff as alleged herein also constitutes an unfair business practice pursuant to Business and Professions Code, section 17200, et seq.

41. The unlawful revocation of Plaintiff's training privileges at SCPA prevented Plaintiff from being able to perform on her implied-in-fact contracts with her clients through providing horse training and riding instruction for her clients and customers of SCPA. In addition, the slanderous statements made by these defendants to Plaintiff's clients and customers ruined the relationships that Plaintiff had with them and thus destroyed her continued future employment with her client and customer base. As a result, Plaintiff has lost business and income, business good will, profits, and suffered injury to her reputation and health as a result of defendants' unlawful interference. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

42. Defendants' actions as alleged herein were a substantial factor in causing the actual damages suffered by Plaintiff and, defendants' actions were willful, oppressive, fraudulent, and malicious, and as a result thereof, Plaintiff is entitled to an award of punitive and exemplary damages.

43. Defendants' conduct will continue to cause great and irreparable injury for which damages will not afford adequate relief in that damages may not completely compensate Plaintiff for all injuries proximately caused by these defendants.

THIRD CAUSE OF ACTION

(For Intentional Interference with Prospective Economic Advantage against defendants, SCPA, WATTS, MAYER and DOES 1-100.)

44. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1

through 43, as if set forth herein in full.

45. From 1998 to October 15, 2008, Plaintiff was gainfully employed as a horse trainer and riding instructor performing the services set forth herein in paragraphs 10, 13, and 14, at SCPA's equestrian facility. At said time, plaintiff had ongoing business relationships and standing appointments with her clients, customers, students and members of the Sullivan Canyon Riding Club and SCPA. The services that Plaintiff provided were part of the continued course of conduct and personal understanding between Plaintiff and her clients, customers, students, and members of SCPA. For example, Plaintiff had standing appointments whereby she would meet her students on site on the same days each week, at the same times, week after week, and these weeks often turned into years. Plaintiff had students that she taught, and was continuing to teach for four (4), five (5) and six (6) years. Similarly, Plaintiff had ongoing relationships to board and groom horses that were for terms in excess of months at a time. As a result of Plaintiff's track record of providing excellent service for clients, Plaintiff reasonably anticipated future economic benefits from the class of clients and customers that she previously serviced and intended to service in the future.

46. At the time defendants SCPA, WATTS, MAYER and DOES, and each of them, engaged in the wrongful conduct as alleged herein in paragraphs 17, 18, 19, 21, 22, 23, 24, and 25, they were fully cognizant of and understood and appreciated the business relationships that Plaintiff had with her clients, customers, students, and members of SCPA and Plaintiff's status as a trainer at SCPA.

47. The wrongful conduct alleged above in paragraphs 17, 18, 19, 21, 22, 23, 24, and 25, was intentional and designed by defendants SCPA, WATTS, MAYER and DOES to disrupt the above described economic relationship between Plaintiff and her clients, customers, students, and members of SCPA and was performed and carried out by these defendants with the intent to harm Plaintiff financially and to induce Plaintiff's clients to end their relationship with Plaintiff. In addition, the wrongful conduct as alleged herein was designed to cause plaintiff to suffer economic loss by preventing her from rightfully being able to perform services for clients and customers as a trainer at SCPA.

48. The wrongful conduct alleged above at paragraphs 17, 18, 19, 21, 22, 23, 24, and 25,

was wrongful by a legal measure other than the wrongful interference itself, to wit: these defendants made knowingly false statements to Plaintiff's client and customer base, as set forth in the First Cause of Action, which is incorporated herein. Further, these defendants retaliated against Plaintiff for reporting WATTS' breach of fiduciary duty as set forth in paragraph 16. SCPA, WATTS, MAYER, and DOES' retaliatory conduct, which is independently wrongful, is set forth in the Background section of this pleading which is incorporated herein. In addition, these defendants manufactured false reasons to terminate Plaintiff's training privileges, the actions of which satisfy the factual predicate necessary to support claims of breach of employment contract, statutory retaliatory wrongful termination for reporting workplace abuses among other grounds pursuant to Government Code, sections 12926.1 and 12940, et seq., and wrongful termination in violation of public policy, in addition to other independently wrongful acts. The wrongful revocation of privileges and publication of slanderous statements regarding Plaintiff as alleged herein also constitutes an unfair business practice pursuant to Business and Professions Code, section 17200, et seq.

49. The unlawful revocation of Plaintiff's training privileges at SCPA prevented Plaintiff from being able to maintain and continue providing horse training and riding instruction for her clients and customers of SCPA. In addition, the slanderous statements made by these defendants to Plaintiff's clients and customers ruined the relationships that Plaintiff had with them and thus destroyed her continued future employment with her client and customer base. As a result, Plaintiff has lost business and income, business good will, profits, and suffered injury to her reputation and health as a result of defendants' unlawful interference. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

50. Defendants' actions as alleged herein were a proximate cause of the actual damages suffered by Plaintiff and, defendants' actions were willful, oppressive, fraudulent, and malicious, and as a result thereof, Plaintiff is entitled to an award of punitive and exemplary damages.

51. Defendants' conduct will continue to cause great and irreparable injury for which damages will not afford adequate relief in that damages may not completely compensate Plaintiff for all injuries proximately caused by these defendants.

FOURTH CAUSE OF ACTION

(For Intentional Infliction of Emotional Distress against defendants, SCPA, WATTS, MAYER and DOES 1-100.)

52. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 51, as if set forth herein in full.

53. In April 2008, WATTS, on horseback, charged toward Plaintiff while Plaintiff was standing on the ground and yelled and screamed at her while threatening that she was "In for it!" that "Your days are numbered!" and that she better "Keep your nose down and mouth shut!" The foregoing was being screamed at Plaintiff while WATTS was towering over Plaintiff brandishing a horsewhip in her face. As to the outrageous conduct of SCPA, WATTS, MAYER, and DOES, these defendants made false and inflammatory statements to Plaintiff's clients, customers, students, and colleagues as set forth in paragraphs 23 and 25. Defendants' conduct is demonstrably outrageous by virtue of the fact that defendants acted with the specific intent to destroy Plaintiff's business, destroy her emotional wellbeing and peace of mind and to cause Plaintiff's customers, clients and vendors not to do business with her. This conduct was intentional and malicious and done for the purpose of causing Plaintiff to suffer humiliation, mental anguish, emotional and physical distress and was done with a wanton and reckless disregard of Plaintiff's physical, mental and financial wellbeing.

54. As a proximate result of the acts and conduct as described above, Plaintiff was hurt and injured in her health, strength, and activity, sustaining serious injury to her nervous system and person.

55. As a further proximate result of defendants' conduct as described above, and the consequences proximately caused by it, as hereinabove alleged, Plaintiff suffered and continues to suffer severe emotional distress and mental suffering, all to her damage. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

56. The aforementioned conduct of defendants was willful and malicious and was intended to oppress and cause injury to Plaintiff. Plaintiff is therefore entitled to an award of exemplary and/or punitive damages.

///

FIFTH CAUSE OF ACTION

(For Breach of Implied Contract of Continued Employment against defendants SCPA and DOES 1 through 100.)

57. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 56, as if set forth herein in full.

58. During Plaintiff's employment at SCPA, and on numerous occasions throughout, Plaintiff was consistently commended for her good job performance, good work ethic and was assured on numerous occasions that she would be able to continue to work as a trainer and that her training privileges would not be terminated arbitrarily. Moreover, Plaintiff relied upon SCPA's written progressive discipline policy (attached hereto as Exhibit A) regarding the causes and manner in which trainers could be discharged as well as SCPA's oral representations regarding the same. Based thereon, Plaintiff and SCPA had entered into an implied contract that Plaintiff would not be discharged unless there was good cause to do so. Further, the rules and regulations for trainers provided that Plaintiff's training privileges could not, and would not, be terminate at will.

59. Based on the oral representations, promises and conduct of SCPA as set forth above, Plaintiff had an employment contract with SCPA that she would be a trainer at SCPA's equestrian facility so long as her performance was satisfactory and that SCPA would not discharge or otherwise terminate her training privileges without good and just cause.

60. Plaintiff at all times fulfilled her duties and conditions under the contract and has been ready, willing, and able to continue performing them in a competent and satisfactory manner.

61. Notwithstanding the express and/or implied promise not to terminate Plaintiff's training privileges except for good cause and an opportunity to be heard, on or about October 15, 2008, SCPA terminated Plaintiff's employment by letter dated September 11, 2008. The letter did not provide any factual or meaningful specificity concerning the true grounds for termination and did not provide for a means for Plaintiff to be heard or otherwise challenge the unilateral termination. Plaintiff is informed and believes and based thereon alleges that she was terminated because she reported WATTS' violation of SCPA rules and regulations to the Board of Directors of SCPA.

62. As a proximate result of SCPA's breach of the employment contract, Plaintiff has

suffered and continues to suffer losses in earnings and other benefits, to her damage in an amount to be established at trial.

SIXTH CAUSE OF ACTION

(For Breach of the Implied Covenant of Good Faith and Fair Dealing against defendants SCPA, WATTS, MAYER and DOES 1-100.)

63. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 62, as if set forth herein in full.

64. The employment agreement referred to above and attached hereto as Exhibit A contained an implied covenant of good faith and fair dealing, which obligated SCPA to perform the terms and conditions of the agreement fairly and in good faith and to refrain from doing any act that would prevent or impede plaintiff from performing any or all of the conditions of the contract that she agreed to perform, or any act that would deprive plaintiff of the benefits of the contract.

65. As set forth above, Plaintiff had a long history of training horses and providing riding instruction at the SCPA equestrian facility. Plaintiff provided said training and instruction to SCPA's predecessor and to SCPA when it was created in 2000. At all times relevant hereto, and as set forth in the Background section above which is incorporated in full herein, SCPA had rules and regulations in place that applied to trainers, and that all SCPA officers and board members were required to follow SCPA's rules and regulations concerning membership and use of the facility. At the time of termination, Plaintiff was never provided the specific true reasons for her termination, and was never provided an opportunity to be heard or an opportunity to defend against the claims leveled against her. In addition, SCPA, at the direction of WATTS and MAYER and DOES selectively enforced rules as to Plaintiff, and specifically looked for ways to fault Plaintiff, while simultaneously allowing known significant rule violations of trainers, the site manager and members to go on unpunished and without any consequences. Plaintiff was a trainer and instructor at SCPA for many years and reasonably relied on the rules and course of conduct at the facility regarding the causes for which trainers could be discharged and the procedures set forth for such discharges, and Plaintiff had the further expectation that defendant would apply its policies even-handedly to afford Plaintiff the protections of those

procedures, including advance notice of the charges and a sufficient opportunity to be heard, if SCPA believed there was cause to discharge Plaintiff.

66. Plaintiff performed all duties and conditions that she was required to perform as a trainer at the SCPA equestrian facility.

67. SCPA knew that Plaintiff performed all duties and conditions that she was required to perform as a trainer at the SCPA equestrian facility.

68. Defendant breached the implied covenant of good faith and fair dealing under the employment agreement by unilaterally terminating her training privileges without sufficient explanation, notice, or an opportunity to be heard concerning the specific reasons for her discharge. The true reasons for Plaintiff's discharge were unrelated to her performance at the facility but were because of Plaintiff reported rule violations by the President, WATTS. From that point forward, WATTS made it his personal mission, along with the help of MAYER and DOES to ruin Plaintiff's life and livelihood. In fact, SCPA revoked Plaintiff's ability to train, not because of alleged poor performance, but because plaintiff, in good faith and in a reasonable, appropriate, and businesslike manner, had attempted to ensure that SCPA operated in an appropriate and efficient manner. Such motives of SCPA were retaliatory in nature and extraneous to the trainer relationship and were intended to deprive Plaintiff of the benefits thereof.

69. As a proximate result of SCPA's breach of the implied covenant of good faith and fair dealing, Plaintiff has suffered, and continues to suffer, losses in earnings and other employment benefits, emotional distress, damage to her reputation and business good will, all to her general and special damage in an amount to be established at trial. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

70. At all times relevant herein, SCPA was acting in conscious disregard of the rights of Plaintiff and is guilty of malice, oppression and fraud. The conduct of SCPA warrants an assessment of punitive damages in an amount appropriate to punish SCPA and deter it from engaging in similar wrongful conduct in the future.

///

SEVENTH CAUSE OF ACTION

(For Violation of Fair Employment and Housing Act, Government Code, Section 12900, et seq. against defendants SCPA, WATTS, MAYER and DOES 1-100.)

71. Plaintiff repeats and re-alleges paragraph 1 through 70, inclusive, as though fully set forth herein.

72. Defendants are entities and individuals subject to suit under the California Fair Employment and Housing Act, Government Code §§ 12900, et seq., in that defendants employed Plaintiff to provide training instruction, grooming, boarding and other related services for SCPA members and guests. Plaintiff, as an employee of the Defendants, has exhausted her administrative remedies including submission of a claim to the Department of Fair Employment and Housing. Plaintiff duly received a Right to Sue letter to pursue her claims.

73. As set forth in paragraphs 17 through 28, SCPA, WATTS, MAYER and DOES, and each of them, discriminated, harassed and retaliated against Plaintiff for reasons and in a manner contrary to public policy, on a pre-textual basis. In addition, Plaintiff is informed and believes and based thereon alleges that these defendants revoked Plaintiff's training privileges because of her presumed substance and alcohol abuse, which they contend was supported by Plaintiff's runny nose, watery eyes and hand tremors. The reality is that Plaintiff is a horse trainer and riding instructor with allergies and she has had a medical condition since elementary school which causes her hand to shake. After defendants wrongfully revoked her training privileges, SCPA, WATTS, MAYER and DOES then went about intimidating, harassing, vexing and annoying Plaintiff with the goal of interfering with her riding privileges. Fortunately, Plaintiff was able to maintain her riding privileges so she could still earn some money running, walking and grooming client horses. However, because defendants presumed Plaintiff was a substance abuser and alcoholic, SCPA, WATTS, MAYER and DOES frequently followed Plaintiff to and from her barn and stables, photographed her on and off SCPA's site, cross-examined Plaintiff's children students to learn information about Plaintiff and her horses, confronted and humiliated Plaintiff about her whereabouts and speech at the SCPA facility, and they went so far as to suspend Plaintiff's riding privileges for a two (2) week period. The suspension was initially stayed, but it was ultimately carried out. All of the foregoing created a hostile

work environment, and an environment that was riddled with hostility, animosity and retaliatory actions against Plaintiff.

74. Defendants' conduct described in the Background section above and in this cause of action, is in violation of Government Code, Section 12940, subsections (a), (h), (j) and (k), and California Constitution Article 1, Section 8.

75. As a proximate result of defendants' discrimination, retaliation and harassment of Plaintiff on the basis of Plaintiff's presumed drug and alcohol use, disability, medical condition, and gender, Plaintiff has suffered and continues to suffer harm, including but not limited to loss of earnings, other employment benefits, humiliation, embarrassment, and mental anguish, all to her damage in an amount to be established in trial. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

76. As set forth herein in paragraphs 17, 27, 28, and 73, SCPA, WATTS, MAYER, and DOES, intentionally harassed, discriminated and retaliated against Plaintiff on the job and subjected Plaintiff to a hostile work environment, and in doing so SCPA, WATTS, MAYER and DOES, and each of them, acted maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, with an evil intent and sinister purpose and/or in conscious disregard for Plaintiff's rights thereby depriving Plaintiff of property or legal rights or otherwise causing injury, so as to justify an award of exemplary and punitive damages.

77. Plaintiff is informed and believe and based thereon alleges that WATTS, MAYER and DOES exercised actual and/or de facto control over SCPA and were in positions of power whereby they made and shaped the company's policy and business decisions and other director level decision making processes, whereby the wrongful conduct by these defendants is imputed to SCPA and as a result thereof, SCPA ratified their conduct, by retaining WATTS, MAYER and DOES after learning of the wrongful conduct alleged herein and failing and refusing to discipline or reprimand them.

///

///

///

EIGHTH CAUSE OF ACTION

(For Wrongful Termination in Violation of Public Policy against defendants SCPA, WATTS, MAYER and DOES 1-100.)

78. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 77, as if set forth herein in full.

79. As set forth herein in paragraph 16, Plaintiff, as an employee of the Defendants, submitted a written notice to her employers, the Board of Directors of SCPA, through the proper reporting channel, advising that WATTS had been allowing a non-member, Olivia Slavin, to ride WATTS' horses at the equestrian facility in violation of SCPA's rules and regulations for approximately ten (10) months.

80. After Plaintiff reported the rule violation, SCPA, WATTS, MAYER and DOES did everything in their power to cause Plaintiff to lose her reputation, and consequently her training and riding privileges at SCPA and to destroy her ability to work as a trainer in Sullivan Canyon, or to otherwise derive any income at all from SCPA or its members. Plaintiff's training privileges were suspended on October 15, 2008. The privileges were suspended without sufficient or proper notice and without an opportunity to challenge the claims or at least to provide a response to the claims. These defendants also pursued a campaign to defame Plaintiff and destroy her reputation as a trainer and instructor.

81. Defendants' conduct as described above is in violation of various statutes, including, but not limited to, California Government Code, Sections 12926.1 and 12940, et seq. and California Constitution Article 1, Section 8. Moreover, Plaintiff is informed and believes and based thereon alleges that SCPA is a non-profit corporation with a public purpose of preserving the Sullivan Canyon property for equestrian use. And in order for SCPA to qualify to accept a significant donation used to acquire the subject equestrian site, SCPA became a supporting foundation to the Mountain Recreation and Conservation Authority (MRCA). As a supporting foundation of MRCA, SCPA stands in the shoes of MRCA insofar as preserving and maintaining the land for equestrian purposes and this subjects SCPA to the open meeting requirements of the Ralph M. Brown Act of 1953. Thus, Plaintiff's unilateral termination was conducted behind closed doors without due process. Defendants'

termination of Plaintiff's privileges also violated the protections afforded by Labor Code, section 1102.5.

82. As a proximate result of defendants' conduct, Plaintiff suffered and continues to suffer harm, including lost earnings and other employment benefits, humiliation, embarrassment and mental anguish, all to her damage in an amount to be established at trial. Plaintiff has sought medical and psychological services and seeks to be reimbursed for past and future services and expenses. The damages sought by Plaintiff exceed the minimum jurisdiction of this Court.

83. In doing the acts set forth above, defendants despicably subjected Plaintiff to cruel and unjust hardship in conscious disregard of Plaintiff's rights by terminating her. Defendants' conduct warrants the assessment of punitive damages.

NINTH CAUSE OF ACTION

(For Violation of Unruh Civil Rights Act Civil Code, Section 51, against defendants SCPA and DOES 1-100.)

84. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 83, as if set forth herein in full.

///

85. Plaintiff is informed and believes and thereon alleges that at all times mentioned, defendants, SCPA was a nonprofit association whose charitable mission was and is to maintain open space in the Sullivan Canyon area of Los Angeles, with an equestrian use open to the general public. SCPA has a large membership, and was without any limits on membership or specific standards for admissibility.

86. At all times herein mentioned, defendant, SCPA, was a business establishment within the meaning of the Unruh Civil Rights Act in that it was a noncommercial entity open to and serving the general public.

87. Plaintiff joined SCPA in 2000 and was a member in good standing until Plaintiff's training privileges were revoked on October 15, 2008, and her riding privileges were suspended for two (2) weeks in 2009.

88. Plaintiff is informed and believes and thereon alleges that, SCPA denied Plaintiff the

services, advantages, accommodations, facilities, and privileges provided to other persons, as alleged above, on account of Plaintiff's presumed drug and alcohol use, disability, medical condition, and gender in contravention of California Civil Code, section 51.

89. As a proximate result of the wrongful acts of SCPA as herein alleged, Plaintiff has suffered the damages as set forth herein. In addition to the complaint for her actual damages, Plaintiff is also entitled to recover statutory damages of three times the amount of actual damages, plus attorney's fees, as provided in California Civil Code, section 52.

TENTH CAUSE OF ACTION

(For Assault against defendants WATTS and DOES 1-100)

90. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 89, as if set forth herein in full.

91. In doing the acts as alleged in paragraphs 21 and 55 herein, defendant WATTS intended to cause or to place Plaintiff in apprehension of a harmful and offensive contact with his person, which caused Plaintiff to experience an immediate fear of an unauthorized physical attack and unlawful touching.

92. At no time did Plaintiff consent to any of the above alleged acts of WATTS.

93. As a proximate result of the acts of WATTS as alleged herein, Plaintiff was hurt and injured in her health, strength, and activity, sustaining injury to her nervous system and person, all of which have caused, and continue to cause, Plaintiff great mental, physical, and nervous pain and suffering.

94. As a further proximate result of WATTS' acts, Plaintiff has been damaged in that she has been required to expend money and incur obligations for medical services and medication reasonably required in the treatment and relief of the injuries herein alleged.

95. The aforementioned conduct of WATTS was willful and malicious and was intended to oppress and cause injury to Plaintiff. Plaintiff is therefore entitled to an award of punitive damages.

///

///

///

ELEVENTH CAUSE OF ACTION

(For Negligence against defendants SCPA and DOES 1-100)

96. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1 through 95, as if set forth herein in full.

97. Before October 15, 2008, Plaintiff was a trainer in good standing with full privileges at SCPA's equestrian facility in Sullivan Canyon. At this time and place, SCPA supervised, controlled, directed and otherwise monitored the conduct of its trainers, including Plaintiff herein. SCPA owed a duty to Plaintiff not to terminate her training privileges negligently and a further duty not to interfere with Plaintiff's relationships with her clients, customers and colleagues, or otherwise harm her business or jeopardize her livelihood.

98. Before SCPA issued its September 11, 2008, letter to Plaintiff terminating her training rights, SCPA based its decision to terminate on the mistaken belief that Plaintiff had alcohol and substance abuse problems. SCPA breached its duty to Plaintiff by failing to investigate adequately or properly or consistent with the standard of care of a non-profit organization the charging allegations against Plaintiff and instead chose negligently to terminate Plaintiff without sufficient inquiry, or a reasoned or good faith analysis of its decision. In addition, the negligent decision to terminate was erroneously and hastily conducted behind closed doors and mistakenly not in compliance with The Ralph M. Brown Act. Moreover, in an effort to learn information about Plaintiff's presumed disability or substance problems, SCPA breached a further duty to Plaintiff by negligently publishing defamatory and false information about Plaintiff to her customers and clients. SCPA, when communicating with Plaintiff's customers and clients, mistakenly and negligently thought it was acceptable to discuss Plaintiff's medical conditions, dependency and/or disability with Plaintiff's customers and clients. By virtue of SCPA's negligent exercise of discretion in deciding to contact Plaintiff's customers and clients directly, and by mistakenly and negligently communicating false and private information about a substance dependency problem that Plaintiff did not have, SCPA caused the harms set forth below. SCPA was operating under the mistaken presumption that such communications were within the scope of SCPA's duties as a non-profit organization operating and maintaining an equestrian facility.

99. Plaintiff alleges that SCPA negligently investigated and negligently communicated with Plaintiff's clients, customers and colleagues, because Plaintiff anticipates that the defense will claim that they communicated with said persons in good faith and without malicious intent. As a result thereof, Plaintiff alleges that any such communications, even in good faith, were negligent because the means and methods of communication used fell below the standard of care of a non-profit company seeking to obtain information about its trainers, and because the communications themselves were negligent when made because they conveyed damaging, harmful, false and hurtful information about Plaintiff.

100. As a proximate result of SCPA's negligent termination of Plaintiff's training privileges and negligent communication of harmful and false information pertaining to Plaintiff to her clients, customers and colleagues, Plaintiff has suffered, and continues to suffer, great mental, physical, emotional, and nervous pain and suffering. As a result of these injuries, Plaintiff has suffered general and special damages, has consulted with medical and healthcare professionals, and will need to seek such care and treatment in the future. In addition, SCPA's conduct has proximately caused harm and damage to her reputation, good will and business resulting in past and future lost earnings. Plaintiff's damages exceed the minimum jurisdiction of this Court.

///

///

///

///

///

///

///

///

///

///

///

WHEREFORE, Plaintiff seeks judgment against defendants, as follows:

(1) For general damages subject to proof at trial;

(2) For special damages subject to proof at trial;

(3) For past and future medical expenses;

(4) For past and future lost income;

(5) For interest as allowed by law;

(6) For statutory damages per California Government Code, section 12900, et seq.;

(7) For punitive and exemplary damages;

(8) For statutory damages per California Civil Code, section 52;

(9) For attorney's fees as authorized by statute, contract or law;

(10) For injunctive relief;

(11) For costs of suit herein incurred; and

(12) For such other and further relief as the Court may deem proper.

DATED: January 17, 2012

McNICHOLAS & McNICHOLAS, LLP

By: _____

John P. McNicholas
Jennifer Ostertag
Attorneys for Plaintiff,
DIANE DUFAU

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is 10866 Wilshire Blvd., Suite 1400, Los Angeles, CA 90024.

On January 17, 2012, I served the within **SUMMONS, FIRST AMENDED COMPLAINT, CIVIL CASE COVERSHEET, CIVIL COVERSHEET ADDENDUM** on the interested parties in said action by placing a true copy thereof enclosed in a sealed envelope, addressed as stated below:

SEE ATTACHED SERVICE LIST

☐ **(BY MAIL)** I deposited such envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.

X **(BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand via NOW MESSENGER to the offices of the addressee.

☐ **(BY FACSIMILE)** The above-described document (s) were sent by facsimile transmission to the facsimile number(s) of the law office(s) stated above. The transmission was reported as complete and without error. A copy of the transmission report is made a part of this proof of service pursuant to CRC §2008.

☐ **(BY ELECTRONIC MAIL)** The above-described document(s) were sent by electronic transmission to the law office(s) stated in the attached Service List. The transmission was reported as complete and without error.

X **(State)** I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☐ **(Federal)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on January 17, 2012, at Los Angeles, California.

Nili Hirsh

SERVICE LIST

Dufau v. The Sullivan Canyon Preservation Association et al.
LASC Case No: SC112380

Attorneys for Defendant The Sullivan Canyon Preservation Association
Geoffrey C. Brown, Esq.
Barbara Palmanova, Esq.
Musick, Peeler & Garrett LLP
One Wilshire Blvd., Suite 2000
Los Angeles, CA 90017-3383
Tel. (213) 629-7612
Fax. (213) 624-1376
Email: g.brown@mpglaw.com
Email: b.pulmanova@mpglaw.com

Attorneys for Defendant Thomas Laurence Watts
Greg William Gibeaut, Esq.
Lauren Bullock, Esq.
Gibeaut, Mahan & Briscoe
6701 Center Drive West, Suite 611
Los Angeles, CA 90045
Tel. (310) 410-2022
Fax. (310) 410-2010
Email: lbullock@gmb-law.com

Attorneys for Defendant Thomas Laurence Watts
David D. Kadue, Esq.
Seyfarth Shaw LLP
2029 Century Park East, Suite 3500
Los Angeles, CA 90067-3021
Tel. (310) 277-7200
Fax. (310) 201-5219
Email: dkadue@seyfarth.com

Attorney for Defendant, Patty V. Mayer
Stephen E. Foster, Esq.
Mitchell Silberberg & Knupp
11377 W. Olympic Blvd.
Los Angeles, CA 90064-1683
Tel. (310) 312-2000
Fax. (310) 312-3100
Email: sef@msk.com

Attorneys for Defendant Thomas Laurence Watts
Emily E. Schroeder, Esq.
Seyfarth Shaw LLP
333 South Hope Street, Suite 3900
Los Angeles, CA 90071-1406
Tel. (213) 270-9600
Fax. (213) 270-9601
Email: eschroeder@seyfarth.com

EXHIBIT "A"

EXHIBIT A

Sullivan Canyon Preservation Association

RULES FOR TRAINERS

(Effective November 2004)

The Sullivan Canyon Preservation Association ("SCPA") is delighted that its community equestrian facility (the "Facility") can be the source of pleasure and athletic accomplishment to riders at all skill levels. We are also pleased that so many trainers are available to assist our members – from beginners to show riders - in making that experience more enjoyable. For the protection of SCPA and all its riders, SCPA has adopted the following rules and requirements governing the use of the Facility by trainers.

1. Trainers must at all times conduct their activities in a manner that is consistent with the fact that the Facility is located within a residential community and that recognizes that the neighbors are not to be subjected to undue or unreasonable interference with the enjoyment of their property by activities taking place at the Facility.

2. Trainers must at all times conduct their activities in a manner that is safe for their clients, for themselves, and for others. Our goal is to avoid all accidents or injuries by exercise of the highest level of care for ourselves, for others, and for all horses using the Facility.

3. In order to avoid overuse of the Facility, and in the interest of safety, SCPA may from time to time regulate use of the Facility by establishing separate rules and schedules that take into consideration the interests of all riders. Trainers are expected to comply with any restrictions on use of the Facility, including any schedules established by SCPA.

4. Each trainer must pay the dues and fees for trainers that are from time to time established by SCPA.

5. Each trainer must provide proof of a policy of active Commercial Liability Insurance by filing a certificate of insurance with the SCPA business office. Training privileges and access to the Facility will be suspended or revoked without further notice unless a current proof of insurance is on file with SCPA. Multiple violations may result in a permanent suspension of training privileges. Insurance coverage must include the following minimum provisions:

   a. The policy must be issued by an A rated company;

b. SCPA must be identified as a covered insured indemnified under the policy;

c. The policy must provide one million dollar ($1,000,000) minimum coverage per claim so that if two or more persons are injured in a single incident the coverage will be a minimum of $1,000,000 for each person injured; and

d. All employees of the trainer, and all trainer assistants, must be identified as covered insureds under the policy.

6. In addition to providing to SCPA proof of insurance, each trainer agrees to indemnify and hold harmless SCPA, SCPA Officers, the SCPA Board, and the individual members of the SCPA Board from any and all liability, including its or their reasonable attorneys' fees and costs, arising out of or related to use of the Facility by trainer or by trainer's clients or horses while under the supervision direction, training or instruction of trainer.

7. Trainer assistants must be approved by SCPA in advance of providing services to a client. Trainers shall insure that their assistants and employees comply with these rules and the trainer is responsible for any violation by an assistant or employee.

8. Each Trainer is limited to a total of 25 students and two school horses.

9. Students must be 5 years of age or older.

10. Before offering training or instruction to any person, a trainer shall confirm with the SCPA Business Office that such person and the horse to be used for such training or instruction are in good standing with SCPA. A trainer is required to provide to the SCPA Business Office a current list of all of that trainer's clients and of the horses each client is riding for instructional purposes. A trainer shall advise the SCPA Business Office of any additions or deletions to their client roster in a timely manner. A trainer shall not provide instruction to any person who is not eligible to use the Facility in accordance with the Rules of SCPA.

11. Guests of members who have met the guest requirements may receive instruction so long as they remain qualified as a guest.

12. Buying, selling, or leasing of horses by trainers is not a SCPA sanctioned activity and SCPA assumes no responsibility for these transactions. Trainers who buy, sell or lease horses on a regular basis may be asked to restrict those activities and trainers risk suspension or revocation of training privileges if they fail to do so after a warning.

13. Trainers may bring to the Facility "sale horses" for a specific client to try on a limited basis so long as the SCPA business office (310.556.0563) is informed in advance. If a potential sale horse is on the Facility for more than one week the trainer will be required to pay the standard facility use fee.

Many of these Rules are safety or risk related. Accordingly, for the protection of SCPA and its riders we must insist that each trainer be in compliance with these rules at all times. In the interest of public safety and in appropriate circumstances, SCPA may take action for breach of these Rules, including suspension or revocation of a trainer's right to use the Facility, without further notice.

Thanks for your cooperation.

I HAVE READ THE FORECOING RULES AND AGREE TO COMPLY WITH THEM.

DATED: MAY-26, 04

Diane DeFazio
PRINT NAME

SIGNATURE

James Yeramian

From: Nancy Freedman <gjf165@gmail.com>
Sent: Thursday, January 26, 2023 2:44 PM
To: James Yeramian
Subject: Larry Watts

Mr. Yermenian,

I am a resident of Brentwood and have been very involved in the community for almost the 50 years I have lived here. I chaired the Brentwood Community Council in the term prior to Larry's. We worked together and I was privileged to do so with such an upstanding personable, knowledgeable gentleman.

Larry Watts is known far and wide in the area as an exceptional person who has served the community and City in numerous ways.
He is currently interested to represent Sullivan Canyon on the MRCA Board of which he is no stranger and no doubt, a valuable participant.

Larry always goes the extra mile to help community situations and has participated in many land issues. He is smart, thorough, well liked and reliable. He is a go to person for many who want mature and decisive answers to questions of land disputes and without boring you, has successfully defused many of these situations which can be daunting.

If I can offer other aspects of Larry for a fuller picture, please let me know. If not, consider the organization fortunate to have him serve. He is a fabulous man.

My best,

Nancy Freedman

James Yeramian

From: Richard Stein <rstein@uoregon.edu>
Sent: Thursday, January 26, 2023 10:17 AM
To: James Yeramian
Subject: Supporting Larry Watts for MRCA representative

Dear Mr. Yermenian,

I have learned that Larry Watts is being considered as MRCA representative for the Sullivan Canyon Preservation Assn. Board. I'm writing to give him the strongest possible endorsement.

In brief, no one has worked more tirelessly (or, as far as I can tell, more effectively) for Sullivan Canyon and its environmental concerns than Larry. He is dedicated to the area and to environmentalism more broadly, and has been an advocate for both for decades. Equally important, he is intelligent, articulate, and dogged in his pursuit of causes that matter. To put this another way, he works with the highest professional standards in his volunteer, non-professional roles. I have observed this first hand as a board member of the Brentwood Community Council (where I also served as Treasurer for many years during Larry's Presidency of the BCC). On the BCC, he is not just a trusted voice: he is THE trusted voice. And, for that matter, he is trusted to carry through with any actions needed that follow from his personal views or our collective decisions: he's not just our most important board member, he is essentially an in-house attorney--and a valuable one at that.

You could not do better than to appoint Larry in this role.

Don't hesitate to contact me if I can add further details.

Best wishes,

Richard Stein

373 N. Kenter Ave.

LA 90049

310-824-3382

James Yeramian

From: Tom Bates <tomhbates85@gmail.com>
Sent: Thursday, January 26, 2023 11:36 AM
To: James Yeramian
Subject: Nomination to the MRCA Board

It a pleasure for me to recommend Larry Watts to the Board of Directors. I have known Larry for over 60 years. He has excellent judgment, is a hard-working consensus builder, and would be a great asset for the Board.

Larry has a history of working to save open space. When, as a member of the State Assembly, I passed the conservation easement legislation, Larry was a strong supporter and advisor.
Sincerely,
Tom Bates
Former State Legislator and Mayor of Berkeley

Sent from my iPhone

James Yeramian

From: Daren Reifsneider <darenreif@gmail.com>
Sent: Thursday, January 26, 2023 9:58 PM
To: James Yeramian
Subject: Larry Watts

Hi James,

I wanted to reach out to express my support for Larry Watts to represent the Sullivan Canyon Preservation Association Board.

I know Larry from the Brentwood Community Council. I'm one of the younger people on the BCC, and Larry has gone out of his way to help me whenever I needed clarification or help with something.

Plus. he's pretty much a legend on the BCC. He founded the Brentwood federation, which eventually turned into the BCC, and according to others, he has always played a super active role.

He regularly introduces motions that focus on ways to protect the high-fire zones and other environmentally-focused goals.

In fact, he's been such a huge part of the BCC, we are planning a 25-year anniversary party, and honoring Larry for his huge contribution to the community.

But that's not the main reason I think he would be great in this role (although it speaks to his commitment & perseverance). The main reason is that you will not find anyone who knows more about the area. His knowledge of the area dates back to a time when Los Angeles looked very different than it does today.
He has the most fascinating stories of riding his horse, along with other riders from Sullivan canyon to San Vicente & Bundy for the annual memorial parade. Or when he had a horses get out and make it all the way to 26th before someone caught it.

I was a competitive rider in a former life & LA history buff, so I eat up all Larry's stories. It's hard not too.

I apologize this is so long-.winded, but you really won't find a better candidate. He's hard-working, has vast knowledge of the area, and would be perfect in this role.

Thanks for your time,
Daren Reifsneider

James Yeramian

From: Anna Gruben <agruben@lanlt.org>
Sent: Thursday, January 26, 2023 9:30 PM
To: James Yeramian
Subject: Letter of Support for Larry Watts, candidate for Sullivan Canyon Preservation Association Board

Dear Mr. Yermenian,

I'm writing to express my enthusiastic support for Larry Watts to represent the Mountains Recreation & Conservancy Authority on the Sullivan Canyon Preservation Association Board. I first met Larry in 2014 when I became Executive Director at People for Parks, a local environmental nonprofit where he was Board President. I think Larry is the hardest working board chair I've ever known. During my time at PFP, he went above and beyond to ensure our team had the resources we needed to carry out the organization's mission. Even more, he frequently accompanied me in the field, lending legal and technical support in critical meetings with stakeholders and decision-makers ranging from LAUSD School Board members to state senators. I enjoyed working with him so much that when I became Program Director at the Los Angeles Neighborhood Land Trust, I lobbied for Larry to serve on that group's advisory board, which he now does. Granted, I didn't have to lobby too hard. I have no doubt he'll make a wonderful representative for MRCA.

Please don't hesitate to reach out with any questions.

Sincerely,
Anna Gruben

Anna Gruben
Program Director
(c) 410-889-2986
1689 Beverly Blvd., Los Angeles, CA 90026
Website I Facebook | Twitter | Instagram | Donate!

LOS ANGELES NEIGHBORHOOD LAND TRUST

We acknowledge that we live, work, and learn on the territory of the Tongva/Gabrielino peoples who are the traditional land caretakers of Tovaangar (Los Angeles basin, So. Channel Islands).

James Yeramian

From: Marylin <mkrell1026@gmail.com>
Sent: Thursday, January 26, 2023 9:19 PM
To: James Yeramian
Subject: Larry Watts

Dear James:
I have worked with Larry Watts for many years and whatever he takes on, he excels. Larry has been riding horses and has been involved in the preservation of Sullivan Canyon for many years. He would be a vigilant and passionate representative of the Sullivan Canyon riding field.

Marylin Krell
Former president of South Brentwood Residents Assn
Member, BCC
Past executive board member, BCC
Member, San Vicente Specific Plan Design Review Board
Sent from Mail for Windows

James Yeramian

From: cldcolson@gmail.com
Sent: Thursday, January 26, 2023 8:15 PM
To: James Yeramian
Subject: Appointment of T. Larry Watts to Board of Directors of Sullivan Canyon Preservation Association

January 26, 2023

Attn: James Yeramian, MCRA Hearing Specialist

Mountains Recreation and Conservation Authority Governing Board

Re: Appointment of T. Larry Watts to Board of Directors of Sullivan Canyon Preservation Association

Dear MRCA Governing Board:

It is with great pleasure that I support the nomination of Larry Watts to become the Mountains Recreation and Conservation Land Authority's designated board member on the Sullivan Canyon Preservation Association.

I have known Larry since the mid-1970's when I was a student at UCLA and became one of Sullivan Canyon's first horseback riding instructors. As is the nature of Sullivan Canyon, we became lifelong friends, united in seeing our families and those of his Sullivan Canyon neighbors and others from the local community enjoy the equestrian recreational use of Sullivan Canyon's community riding facility and public trail open spaces. My sister, who was completing her master's in social work at UCLA, had learned trail building through a BLM program for Youth Conservation Corps and led a group of youth construction workers to improve public trail access from Sullivan Canyon into the Santa Monica Mountains trail system. Those relationships between families, neighbors, friends and riding communities have endured for almost 50 years.

I can vouch for the fact that Larry represents the true interests of the equestrian community within the Westside communities and regional park networks. He has been affiliated with many neighborhood and equestrian associations, always with an open mind, fully approachable in his considerate, congenial, and thoughtful manner. I have always admired his tenacity and tenure as well as his fluidity in social, oral, and written communication. He works diligently to bring a level-headed, resourceful, and respectful solution to complex, diverse interests of his clients and member associations.

I cannot think of anyone more qualified to represent the Mountains Recreation and Conservation Authority on the Board of Directors of Sullivan Canyon Preservation Association (SCPA). He's a committee member who digs in deep to contribute to the betterment of neighborhood associations, task forces and volunteer groups. His history of involvement with SCPA, experience with parks and recreation, stewardship conservancies, public access to parks, schools and open space combined with his knowledge in land use, real estate and construction litigation will bring depth and dimension to the Board. His comprehensive first-hand experience and understanding of the evolution of Sullivan Canyon and its unique blend of architectural, recreational horse activities and broader Westside communities' culture will be valued in stewarding the interests of Mountains Recreation and Conservation Association with the Sullivan Canyon Preservation Association.

I strongly urge you to support his assignment to the position.

Sincerely yours,

Carolyn Colson

James Yeramian

From: Cyrille <cyrille1@aol.com>
Sent: Thursday, January 26, 2023 4:46 PM
To: James Yeramian
Subject: Larry Watts

I have known Mr. Watts for many years. We served on the executive committee of Brentwood Green (an organization devoted to raising funds
and seeing to the implementation of learning gardens on the campus of Brentwood Elementary). In addition to the fact that Mr. Watts lives
in Sullivan Canyon, he is an organized, dedicated volunteer. I would be ecstatic to have him on any committee of which I was as part !

Sincerely,

Cyrille Schiff
1332 Jonesboro Drive
Ls Angeles, CA 90049

310.490.6061

James Yeramian

From: Tori Kjer <tkjer@lanlt.org>
Sent: Thursday, January 26, 2023 4:36 PM
To: James Yeramian
Subject: Larry Watts - Sullivan Canyon Designated Representative

Dear Mr. Yermenian,
I am writing in support of Larry Watts as a designated representative for the conservation easement of the riding field in Sullivan Canyon.

I have known and worked with Mr. Watts for nearly a decade. Our work together has been in multiple capacities related to parks and open spaces in Los Angeles. Mr. Watts is extremely dedicated to open space preservation, park equity and working to ensure all angelenos have access to parks and green space. Additionally, Mr. Watts also brings legal experience as a partner with Seyfarth and Shaw. He is an excellent candidate for this role and will take his job as the dedicated representative very seriously. I highly recommend Mr. Watts for this position.

If you should have any questions please don't hesitate to reach out to me on my cell at 310-909-3891.
Best,
Tori

Tori Kjer, PLA, Executive Director (she/her)
(c) 310.909.3891
1689 Beverly Blvd., Los Angeles, CA 90026
Website I Facebook | Twitter | Instagram | Donate!

We acknowledge that we live, work, and learn on the territory of the Tongva/Gabrielino peoples who are the traditional land caretakers of Tovaangar (Los Angeles basin, So. Channel Islands).

James Yeramian

From: Carolyn Jordan <cjordan@glaserweil.com>
Sent: Thursday, January 26, 2023 9:46 AM
To: James Yeramian; James Yeramian
Subject: Larry Watts, nominee for Sullivan Canyon Preservation Board - Endorsement

Dear James - I understand that Mr. Larry Watts is under consideration for the Sullivan Canyon Preservation Board. I wanted to share with you my resounding endorsement of Larry for this important position. A lifelong resident of Brentwood, I have had the good fortune of getting to know Larry during my tenure over the last ten years volunteering for the Brentwood Community Council, which I currently Chair. The MCRA will be well served with Larry as a Board Member on the Sullivan Canyon Preservation Board.

Larry is, simply put, one in a million. Gracious, honest, hard working, caring, selfless, always ready to step up and help out - there just aren't many people like Larry around. One of the best things to come from my years volunteering has been the privilege to get to know Larry and to count him among my friends.

As for Sullivan Canyon, I have not met a more staunch supporter and defender of Sullivan Canyon. Larry, an avid horseman, had dedicated his life to preserving and protecting Sullivan Canyon. He knows its history backward and forward. Larry's volunteer service has been an important piece in preserving Sullivan Canyon to date. When he talks about Sullivan Canyon, its history, his life with his family there, you can't help but fall in love with the Canyon yourself.

I have had the opportunity to witness Larry's dedication first hand time and time again in protecting Sullivan Canyon, from protecting its native trees, to addressing and halting inappropriate development, to serving selflessly on the Sullivan Canyon Homeowner's Board for many years, to his incredibly important role in protecting the riding ring itself. I don't believe there would even be a discussion today regarding a Sullivan Canyon Preservation Association, nor would there be a conservation easement held by MRCA, if it weren't for Larry Watts and his pivotal role in protecting the riding ring in the first place.

Always looking to give back, Larry was also instrumental in bringing an organization working with special needs individuals to the riding ring, providing equine therapy to those dealing with lifelong challenges.

I hope you nominate Larry Watts to the Board of the Sullivan Canyon Preservation Association - we, the canyon and the community, need him.

Thank you for your consideration.

Carolyn Jordan

Note: These are my personal views and not necessarily of any organization I represent.

James Yeramian January 28, 2023
yeramian@smmc.ca.gov
Mountains Recreation & Conservancy Authority

Dear Mr. Yeramian,

It is with great pleasure that I write this letter of recommendation for T. Larry Watts to be selected as the representative of MRCA to the Sullivan Canyon Preservation Association Board.

I have lived in Brentwood for over 25 years and have been active in many of the organizations that support the west side of Los Angeles. I have worked with volunteers, politicians, law enforcement, and emergency services. Over the past 4 years, Larry and I have been on the Brentwood Community Council together (BCC). He has been an outstanding asset to our organization.

Many of the issues dealt with by the BCC can be complicated and politically charged. Larry has a keen eye for detail in assessing the issues before us and a talent for focusing on the core issues when needed. He is invaluable to us in his clear thinking and practical approach to solutions. He is impeccably honest and of the highest integrity.

He is also a man that is generous with his time and kind heart. He has been willing to help others in a couple of situations that took hours and skillful negotiation to resolve. He did this well with no complaint and was, in each case, able to employ his problem-solving abilities successfully.

I strongly recommend Larry to represent MRCA. Larry brings a wealth of experience to further the MRCA mission and is an individual who loves Sullivan Canyon. I cannot think of a better fit for accomplishing your goals particularly in the preservation and management of natural and urban settings.

Respectfully,

Judie Hulett, Ph.D.

James Yeramian

From: Ahead With Horses <aheadwithhorses@yahoo.com>
Sent: Saturday, January 28, 2023 10:53 AM
To: James Yeramian
Subject: SCPA Appointee for MRCA

To Whom It May Concern,

We have been told that Larry Watts is one person who has put in an application for the SCPA appointed position. Larry Watts, and his wife Happy, have been supporters of AHEAD With Horses for years. They have been donating their horse, Minty, to the program for I believe around 10 years. When they got her, they said that Minty's first priority would be to work with AHEAD With Horses on Thursdays. They bring her down to the field themselves almost every week and pick her back up. If they will be out of town or have something come up, they always make arrangements so that Minty will still be able to work with our program.

In addition to their donation of their amazing horse every week (Minty is perfect in our program), they have also made numerous financial donations. When the pandemic hit, they asked what they could do, and have been sponsoring one of Minty's "coworkers" every month since. We were also told that when we held our second annual Ride-A-Thon fundraiser at Sullivan Canyon this December, that since the board was not able to underwrite the food truck as they had the previous year, that Larry was one of the board members that decided to pay for that out of pocket so that it would still be covered for the event.

We know that the Watts family is very supportive of our non-profit therapeutic vaulting program and thank them for all that they do out of the goodness of their hearts.

Sincerely,

Michelle Newman, Executive Director
AHEAD With Horses Inc.
10157 Johanna Ave.
Shadow Hills, CA 91040
(818) 767- 6373
AWHLA.org

James Yeramian

From: Elyse Arbour <Elyse@elysearbour.com>
Sent: Friday, January 27, 2023 6:19 PM
To: James Yeramian
Cc: Elyse Arbour
Subject: Sullivan Canyon Recommendation

James,

I cannot think of a better person to represent the MRCA than Larry Watts. First of all, he owns a home in Sullivan Canyon and has lived there for about 40 years! Larry has been involved in the Brentwood Community for many years. He is on the
Executive Board of the Brentwood Community Council and is a Past President of the organization. Larry is very smart, detail oriented, diligent, and very fair in his decision making process. He is a great listener and works well with everyone.

Best,
Elyse Arbour

Elyse Arbour
Rodeo Realty, Brentwood
11943 San Vicente Blvd. #100
Los Angeles, CA 90049
310-873-4188 office
310-893-9388 cell
www.ElyseArbour.com
Bre#01227787