

**Tripatinder Chowdhry
18 Terrace Avenue
Half Moon Bay, CA 94019
650-274-4653**

Hand Delivered

RECEIVED
IN THE OFFICE OF

SEP 17 2018

CLERK OF THE
BOARD OF SUPERVISORS

September 17, 2018

Clerk to the Honorable Board of Supervisors
San Mateo County
400 County Center
Redwood City, CA 94063

RE: Request for Public Documents – California Public Records Act

Dear Sir/Madam:

Pursuant to the California Public Records Act (Government Code, Sections 6250, et seq.), I request that the following document be copied and that the copies be made available to the undersigned within the time specified in the Public Records Act.

Pursuant to section 6253.1, you are reminded that a public entity is required, inter alia, to assist the member of the public to identify records and information that are responsive to the request.

The word "communication" includes but is not limited to, telephone messages, notes, memoranda, e-mail messages, text messages, letters, staff reports, copies or laws, ordinances, resolutions, municipal code sections located in the files of:

Properties: 655 Miramar, Half Moon Bay, CA; APN 048-076-130; APN 048-076-120; APN 048-076-140; and APN 048-076-160.

Violation: for Violation Case 2017-00054;

Time Period: March 1, 2018, to the date of production of the documents.

The documents (copies) requested are:

1. All communication pertaining to Violation Case 2017-00054 (VIO 2017-00054).

2. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with Violation Case 2017-00054

3. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with 655 Miramar, Half Moon Bay, CA

4. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with APN 048-076-130

5. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with APN 048-076-120

6. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with APN 048-076-140

7. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party in connection with APN 048-076-160

8. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party to and from Tad Sanders in connection with any of the properties referred to above and the alleged violation.

9. All communication by and between any County of San Mateo (the "County") official and/or consultant and/or third party to and from Charles Bronitsky in connection with any and all of the properties referred to above and the alleged violation.

10. All communication regarding 655 Miramar, Half Moon Bay and/or Violation Case 2017-00054 with any of the County Planning Commission members.

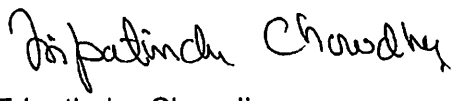
11. All communication regarding 655 Miramar, Half Moon Bay and/or Violation Case 2017-00054 with any of the County members of the Board of Supervisors

County Clerk
San Mateo County
September 17, 2018
Page 3

Please contact the undersigned when the documents are ready. I understand that there is a cost for the copying and that you will inform me of the cost. Please note that you are required to respond to this letter within 10 calendar days.

Thank you for your assistance in this matter.

Sincerely,


Tripatinder Chowdhry

Joan Kling

From: Tejinder singh <tjsingh007@me.com>
Sent: Friday, April 06, 2018 2:53 PM
To: Joan Kling
Subject: Fwd: Update

Hello Joan,

Trip was delighted to meet with you yesterday.

I responded with the email below to Ana and based on my conversation with her, this case does not need to be reopened again.

We are in the lawsuit with the other party. They keep moving the trial date and never made it to any of the earlier dates. The lawsuit is now set for the week of July 30th. Once the lawsuit is resolved, we will be coming to the county with our new driveway plan (the engineering designs are almost complete) for approval.

Thanks

With kind regards

TJ Singh

Begin forwarded message:

From: Tejinder singh <tjsingh007@me.com>
Date: November 16, 2017 7:50:55 PM
To: "Ana M. Santiago" <AMSantiago@smcgov.org>
Subject: Notice

Dear Ana,

I am attaching the Notice of Violation that you gave Trip last Thursday.

I have carefully reviewed the Notice of Violation and I can assure you that we are not in violation of SMC sec 6412(a)(b). We have always strived to be fully compliant with every County, State and Federal codes and believe that we are in compliance with all codes regarding the fence. The fence does not obstruct any views either.

Chapter 13.20, COASTAL ZONE REGULATIONS, 13.20.061 Improvements to existing single-family residences exemption, makes reference to the “fence” permit exception.

“... no coastal development permit is required for improvements to existing single-family residences (including to fixtures and other structures directly attached to the residence; structures on the property normally associated with a single-family residence, such as garages, swimming pools in-ground and above-ground, hot tubs, fences, decks, storage sheds, and attached low-profile solar panels, and landscaping on the property, but not including guest houses or self-contained residential units). Allowed improvements that do not require a coastal development permit include additions of less than 500 square feet outside the appeal jurisdiction of the Coastal Commission, remodels, alterations, replacement of existing water storage tanks, wells or septic systems serving an existing single-family residence where there is no expansion of the replaced feature or its capacity, and new accessory structures except for self-contained residential units including second units (as defined in SCCC 13.10.700-S; see also SCCC 13.20.107 and 13.20.108).” Single family residences may have on for more APNs. The fence is an integral part of the single family residence 655 Miramar, Half Moon Bay, CA 94019 which has existed for several decades as such.

When you get a chance, if you prefer, please suggest a convenient time to schedule an inspection on site. I am on an international travel until early December and anytime after that would work for me.

Since we are not in violation of the cited violation SMC sec 6412(a)(b), I respectfully request that the violation be removed. Further, due to my international travel, I will appreciate if we can schedule a visit on site in early December when I return, to further assure you. In the meantime, I would appreciate that we may not be subject to any deadlines until the on site visit in early December.

Following link has additional details for your kind consideration.

<https://www.dropbox.com/s/fg5rxsl6n899a31/Notice%20of%20Violation%20brief%20response.pdf?dl=0>

If needed, you may please reach me in India at +91 888 289 5878

Thanks

Kind regards

TJ Singh

Joan Kling

From: Summer Burlison
Sent: Wednesday, August 22, 2018 9:22 AM
To: Joan Kling; Lisa Aozasa
Subject: RE: 655 Miramar Dr. VIO2017-0054

I'm not sure if this is a different fence from the one captured under VIO2017-00411 that has since been closed?

Thanks,
Summer

From: Joan Kling
Sent: Tuesday, August 21, 2018 5:21 PM
To: Summer Burlison <sburlison@smcgov.org>; Lisa Aozasa <laozasa@smcgov.org>
Subject: 655 Miramar Dr. VIO2017-0054

Tad Sanders called again today.

The case regarding fences installed without a CDP is outstanding.

I want to issue a \$100 Administrative Citation and would like your agreement on that being the next overdue step.

Let me know your thoughts.

Tks.

Joan

Joan Kling
Code Compliance Manager
jkling@smcgov.org



COUNTY OF SAN MATEO
PLANNING AND BUILDING

Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
(650) 363-4011 T
(650) 363-4849 F
<http://planning.smcgov.org/code-compliance>

To provide feedback, please visit the [Planning and Building Survey](#). Thank you.

Joan Kling

From: Summer Burlison
Sent: Tuesday, September 04, 2018 3:52 PM
To: Joan Kling
Subject: Accepted: 655 Miramar VIO217-00054

Joan Kling

From: Melissa Alota on behalf of COB_201PLN
Sent: Tuesday, September 04, 2018 4:43 PM
To: Joan Kling
Subject: Accepted: 655 Miramar VIO217-00054

Joan Kling

From: Janneth Lujan
Sent: Monday, September 10, 2018 2:26 PM
To: Joan Kling
Cc: Michael Crivello; Summer Burlison
Subject: 655 Miramar VIO217-00054

Importance: High

Hi Joan,
Steve has called a Sr. Management meeting this Thursday 9/13 at 9:00 a.m. Would it be possible to mover this meeting to another time in order for you to attend and for us to use the meeting room?

Janneth

Janneth Lujan

Executive Secretary for Steve Monowitz
Planning and Building Department
Planning Commission Secretary
jlujan@smcgov.org



COUNTY OF SAN MATEO
PLANNING AND BUILDING

Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
(650) 363-1859 T
(650) 363-4849 F
www.planning.smcgov.org

Proud Vice President of:



Joan Kling

Subject: 655 Miramar VIO217-00054
Location: COB_201PLN

Start: Thu 9/13/2018 9:30 AM
End: Thu 9/13/2018 10:00 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Joan Kling
Required Attendees: Summer Burlison; Michael Crivello
Resources: COB_201PLN

This is the property that needs a CDP for the placement of fencing. I need to review it with you.

Tks.

Rita McLaughlin

From: Summer Burlison
Sent: Thursday, September 13, 2018 12:18 PM
To: tj singh
Cc: Joan Kling
Subject: Access Easement fence - 655 Miramar Violation Case 2017-00054

Hello TJ,

Code Compliance mentioned they are getting ready to issue a citation for the unpermitted fence installed along the access easement running through your property as there's been no confirmation that it has been removed and no application for a Coastal Development Permit (CDP) to seek legalization. It was agreed that I could reach out to you before a citation is issued (which carries citation fees) to try to get resolution (and avoid any citation fees for you!). Your options are below:

1. Remove the fence and call code compliance to site verify removal, which would address the violation and upon confirmation of removal, the violation case would be closed.
2. Apply for a CDP to legalize the fence, in which staff would likely recommend denial for the fence as it does not serve a permitted use on the property and detracts from the natural surrounding environment. A CDP would require a public hearing before the Planning Commission (PC) and the PC's decision is appealable. The CDP application filing fee for an after-the-fact CDP is approximately \$7,800.

One of the above options needs to **completed by Friday, September 28, 2018** in order to avoid the issuance of a citation by the Code Compliance Section.

Regards,
Summer

Summer Burlison
Planner III

County of San Mateo
Planning & Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
Tel: 650/363-1815
FAX: 650/363-4849
<http://planning.smcgov.org>

Please be aware that I am out of the office every other Monday. For immediate assistance, contact the Planning counter at 650/363-1825.

Joan Kling

From: Joan Kling
Sent: Thursday, September 13, 2018 2:15 PM
To: Summer Burlison
Subject: RE: Access Easement fence - 655 Miramar Violation Case 2017-00054

Tks!!

From: Summer Burlison
Sent: Thursday, September 13, 2018 12:18 PM
To: tj singh <tjsingh007@me.com>
Cc: Joan Kling <jkling@smcgov.org>
Subject: Access Easement fence - 655 Miramar Violation Case 2017-00054

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Regards,
Summer

Summer Burlison
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Joan Kling

From: Joan Kling
Sent: Wednesday, September 19, 2018 11:33 AM
To: Tejinder singh
Cc: Summer Burlison
Subject: RE: Access Easement fence - 655 Miramar Violation Case 2017-00054

Hi TJ,

San Mateo County is happy to give you one more extension to remove the access easement fence. Thank you for your willingness to voluntarily remove the fencing on or before October 12.

I will make a site visit the following week to verify the removal.

Thanks again for your cooperation in removing the fence.

Joan

From: Tejinder singh [mailto:tjsingh007@me.com]
Sent: Tuesday, September 18, 2018 10:02 AM
To: Joan Kling <jkling@smcgov.org>
Cc: Summer Burlison <sburlison@smcgov.org>
Subject: Re: Access Easement fence - 655 Miramar Violation Case 2017-00054

Hello Joan,

It was a pleasure to talk with you yesterday. As we discussed yesterday, I am confirming moving the deadline to October 12 instead of September 28 since I am traveling.

Thanks
TJ

On Sep 17, 2018, at 11:18 AM, Summer Burlison <sburlison@smcgov.org> wrote:

Hi TJ,

In follow-up to my meeting with Tripp (and you via conference call), the deadline of Friday, September 28, 2018 for addressing the fence violation, as layed out below, stands in order to avoid a citation from the Code Compliance Section.

Your desire in putting together an application submittal to build a residence on the parcel now may still occur, but will be on a separate track from addressing the fence violation given the length of time for processing a development application. Your development application may include (re)installation of fencing, upon securing your permit approvals for residential development.

Regards

Summer

Summer Burlison
Planner III

County of San Mateo

Planning & Building Department

455 County Center, 2nd Floor

Redwood City, CA 94063

Tel: 650/363-1815

FAX: 650/363-4849

<http://planning.smcgov.org>

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From: Summer Burlison

Sent: Thursday, September 13, 2018 12:18 PM

To: 'tj singh' <tjsingh007@me.com>

Cc: Joan Kling <jkling@smcgov.org>

Subject: Access Easement fence - 655 Miramar Violation Case 2017-00054

Hello TJ,

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Regards,

Summer

Summer Burlison
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Joan Kling

From: Tejinder singh <tjsingh007@me.com>
Sent: Thursday, September 20, 2018 5:16 AM
To: Summer Burlison; Joan Kling
Cc: Timothy Fox
Subject: Re: Access Easement fence - 655 Miramar Violation Case 2017-00054

Hello Summer and Joan,

In line with your discussion with Tripp regarding the security fence, I am attaching the video links below. To understand the situation, please imagine this was happening in your front yard.

- The link below is the video of the people sent by the complainant Tad Sanders to our property. These people sent by Tad Sanders, who is also the complainant about the fence, masked their license plates while involved in illegal activity on our property - this and other illegal activities prompted the Sheriff's Deputies to instruct us to install fences.

<https://www.dropbox.com/s/31qvbxtqgwbpb2/Driving%20with%20Masked%20License%20Plate%2010062.mov?dl=0>

The complainant Tad Sanders and their attorney, Charles Bronitsky, had filed an ex-parte lawsuit with the San Mateo County Superior Court on February 22nd, 2017 to remove our fences.

The Court denied their complaint. It seems they are now using the honorable County officials.

Thanks
TJ Singh

On Sep 18, 2018, at 10:01 AM, Tejinder singh <tjsingh007@me.com> wrote:

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Called	Date	Colleen Barrett	Message	2001 Kenp Mnt Rd
✓	Phone	V 102018-00280		
	Caller	650 759 1533		end of Sept inspection
	Company	16		
Called	Date	8/8/16	Message	Deputy City Manager RWC
✓	Phone	25283		Spring St. auto detail-
	Caller	auction family living there		
	Company	650-780-7362		
Called	Date		Message	
✓	Phone	Alex Khajikian		
	Caller	X-Street		-street parking-
	Company			
Called	Date	8/16	Message	
✓	Phone	4057		8/19 735am
	Caller			
	Company			
Called	Date	4/25 8/10	Message	
✓	Phone	Examine		
	Caller			
	Company			
Called	Date	8/15 Landsend	Message	
✓	Phone			
	Caller			
	Company			
Called	Date	8/1	Message	
✓	Phone	Tad Sanders		2017-00054
	Caller	101-836-9077		please call
	Company			
Called	Date	8/9 Smith	Message	38 8726299
✓	Phone	Robert Nathan		2001 Ken
	Caller			
	Company			

Called	Date	8/16	7pm	Message
✓	Phone	Anate? How?		
	Caller	965 Burhelly		
	Company	408 834 5502 VIO 2018-00300		
		650-851-8284		
Called	Date	8/20		Message
✓	Phone	X1825	Joe Webb	AIR BUB
	Caller	263 Huakleberry	water on well - water & pipe	
	Company	Status of site permits? dirt removal permits		
		effire? A		
Called	Date			Message
✓	Phone	Call Ted Sanders		
	Caller	655 Murgan		
	Company	VIO 2017-00059		
		707 696-7059		
Called	Date	X1306	8/21	Message
✓	Phone	Carla.		
	Caller			
	Company			
Called	Date	X1825	8/20	Message
✓	Phone			
	Caller			
	Company			
Called	Date			Message
✓	Phone	Kuin Pratt - STR + construction		
	Caller	VIO 2018-00315		
	Company	408 458 6880		
Called	Date	Thurs	2/11	Message
✓	Phone	Gerald Jannij		
	Caller	Alexandre Ane		
	Company	650 465 08095		
Called	Date	8/24		Message
✓	Phone	Robert Zalkin		
	Caller			
	Company			

Called	Date 9/13	Phone 97609	Message
	Caller		
	Company		
Called	Date 9/12	Phone [Redacted]	Message
	Caller [Redacted]		
	Company		
Called	Date	Phone 2298	Message
	Caller	512 415 6417	Tom. Entry wife paid was there
	Company		Redd
			retaining wall
Called	Date	Phone	Message
	Caller		Robert
	Company		email w/ questions.
			answer questions in email.
Called	Date 9/13	Phone	Message
	Caller	808 am	home 650 563 4177
	Company	Barbara Greensburg	036-103-660
		707 483 7405	
		commercial pup storage on lot	
		construction equipment.	
Called	Date	Phone	Message
	Caller		
	Company		
Called	Date	Phone	Message
	Caller		Edde Stassen - don't hang
	Company		plans to be dropped off next week
		924 Fortwell Drive	415 846-3620
Called	Date	Phone	Message
	Caller		
	Company		

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Sunday, September 23, 2018. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

201201210214 TEG PARTNERS, LLC

Registration Date:	01/12/2012
Jurisdiction:	DELAWARE
Entity Type:	FOREIGN
Status:	ACTIVE
Agent for Service of Process:	<u>PARACORP INCORPORATED (C1082536)</u> To find the most current California registered Corporate Agent for Service of Process address and authorized employee(s) information, click the link above and then select the most current 1505 Certificate.
Entity Address:	18 TERRACE AVE HALF MOON BAY CA 94019
Entity Mailing Address:	18 TERRACE AVE HALF MOON BAY CA 94019
LLC Management	*

A Statement of Information is due EVERY EVEN-NUMBERED year beginning five months before and through the end of January.

Document Type	↕ File Date	↕ PDF
SI-NO CHANGE	10/30/2017	
SI-COMPLETE	11/02/2015	
REGISTRATION	01/12/2012	

* Indicates the information is not contained in the California Secretary of State's database.

Note: If the agent for service of process is a corporation, the address of the agent may be requested by ordering a status report.

- For information on checking or reserving a name, refer to [Name Availability](#).
- If the image is not available online, for information on ordering a copy refer to [Information Requests](#).

- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Frequently Asked Questions](#).

[Modify Search](#)[New Search](#)[Back to Search Results](#)

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Sunday, September 23, 2018. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

C1082536 PARACORP INCORPORATED

Registration Date:	07/09/1981
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC STOCK
Status:	ACTIVE
Agent for Service of Process:	MATTHEW MARZUCCO 2804 GATEWAY OAKS DR #100 SACRAMENTO CA 95833
Entity Address:	2804 GATEWAY OAKS DR #100 SACRAMENTO CA 95833
Entity Mailing Address:	PO BOX 160568 SACRAMENTO CA 95816-0568

A Statement of Information is due EVERY year beginning five months before and through the end of July.

Document Type	↕ File Date ↕ PDF
1505 CERTIFICATE	07/11/2018
SI-NO CHANGE	02/21/2018
SI-COMPLETE	12/05/2017
1505 CERTIFICATE	11/01/2017
1505 CERTIFICATE	07/13/2017
1505 CERTIFICATE	04/19/2017
1505 CERTIFICATE	01/26/2017
1505 CERTIFICATE	11/29/2016

Document Type	File Date	PDF
1505 CERTIFICATE	07/18/2016	
1505 CERTIFICATE	02/25/2016	
1505 CERTIFICATE	01/05/2015	
1505 CERTIFICATE	11/12/2014	
1505 CERTIFICATE	10/07/2014	
1505 CERTIFICATE	06/11/2014	
1505 CERTIFICATE	04/11/2014	
1505 CERTIFICATE	02/18/2011	
1505 CERTIFICATE	10/23/2007	
1505 CERTIFICATE	11/10/1997	
RESTATED REGISTRATION	07/21/1997	
1505 CERTIFICATE	08/25/1995	
1505 CERTIFICATE	07/12/1994	
1505 CERTIFICATE	09/06/1990	
1505 CERTIFICATE	03/01/1989	
RESTATED REGISTRATION	03/03/1988	
1505 CERTIFICATE	12/11/1987	
AMENDMENT	12/11/1987	
1505 CERTIFICATE	03/31/1986	Image unavailable. Please request paper copy.
AMENDMENT	10/11/1984	Image unavailable. Please request paper copy.
1505 CERTIFICATE	10/11/1984	Image unavailable. Please request paper copy.

Document Type	↕ File Date ↕	PDF
REGISTRATION	07/09/1981	Image unavailable. Please request paper copy.

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code [section 2114](#) for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to [Name Availability](#).
- If the image is not available online, for information on ordering a copy refer to [Information Requests](#).
- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Frequently Asked Questions](#).

[Modify Search](#)

[New Search](#)

[Back to Search Results](#)

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Sunday, September 23, 2018. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

199728900036 TEG INVESTMENTS, A NEVADA LIMITED PARTNERSHIP

Registration Date:	10/15/1997
Jurisdiction:	NEVADA
Entity Type:	FOREIGN
Status:	ACTIVE
Agent for Service of Process:	JADWINDER SINGH 96 MISSION RIDGE COURT FREMONT CA 94539
Entity Address:	318 N. CARSON ST., #208 CARSON CITY NV 89701
Entity Mailing Address:	*

Document Type	↕ File Date	↕ PDF
REGISTRATION	10/15/1997	

* Indicates the information is not contained in the California Secretary of State's database.

Note: If the agent for service of process is a corporation, the address of the agent may be requested by ordering a status report.

- For information on checking or reserving a name, refer to [Name Availability](#).
- If the image is not available online, for information on ordering a copy refer to [Information Requests](#).
- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Frequently Asked Questions](#).

[Modify Search](#) [New Search](#) [Back to Search Results](#)

County of San Mateo
Planning and Building Department
CODE VIOLATION CHECKLIST

1. Violation Type

- ☐ Zoning/Use ☐ Tree Removal ☐ Grading/Land Clearing
☐ Building ☒ Nuisance ☐ Other: _____

Description of Complaint: NUISANCE – Fence being erected in easement of property.

2. Location of Alleged Violation

Address: 655 MIRAMAR DR. (Front Lot) APN(s): 048-076-120
MIRAMAR Zoning: R-1, S-94, DR, CD

3. Names of Alleged Property Owner(s)/Other

Property
Owner: TEG PARTNERS LLC Other:
Address: 18 TERRACE AVE. Address:
HALF MOON BAY, CA 94019

4. Processing

<u>Step</u>	<u>By</u>	<u>Date</u>
a. Complaint Received	<u>RMM</u>	<u>2/22/17</u>
b. Violation Assigned	<u>AXS</u>	<u>2/22/17</u>
c. First Inspection	<u>AXS</u>	<u>11-3-17</u>
d. Notice of Violation		
e. Second Inspection		
f. Citation		
g. Citation		
h. Compliance Order		
i. Administrative Order		
j. Abatement		

5. Disposition (describe final disposition of case)

6. Date file closed: _____ By: _____

7. Senior Code Compliance Officer: _____ Date: _____

811.101

455 County Center, Redwood City, CA 94063
P (650) 363-4161 | F (650) 363-4849

VIO: VID2017-00054

Assigned to: ANA SANTIAGO

Code Violation Complaint Form (All Items Must Be Completed)

1. Violation Type:

- ☐ Zoning
 ☒ Nuisance
 ☐ Abandoned Vehicles on Private Property
☐ Grading
 ☐ Tree Removal
 ☒ Other

Details of Complaint:

Erection of fences on a vacant parcel that is impairing access to our property. The assistant Fire Marshal told me they will not service my client's property at 655 Miramar with a fire truck because the fences are in the way. I discussed this with Camille Leung and she indicated these fences are illegal but i could not find a code section that says so. I will attach photos of the fences in question.

2. Location of Alleged Violation:

there is no address as this lot is vacant

655 MIRAMAR DR.

Address

Half Moon Bay

CA

94019

City

State

ZIP Code

Assessor Parcel Number (APN):

ZONE R-1, S-94, DR, CD

0	4	8	0	7	6	1	2	0
---	---	---	---	---	---	---	---	---

APN is a 9 digit (e.g. 004050570) number that identifies a property.
(DO NOT USE CHARACTERS OR SPACES).

3. Alleged Violators:

TEG Partners, TJ Singh and Tripatinder Chowdry

650-274-4653

Name

Phone (e.g. 650-363-4161)

18 Terrace

Address

Half Moon Bay

CA

94019

City

State

ZIP Code

4. Complainant Information:

Tad Sanders

707-836-9077

Name

Phone (e.g. 650-363-4161)

1360 19th Hole Drive, Suite 201

Address

Windsor

CA

95492

City

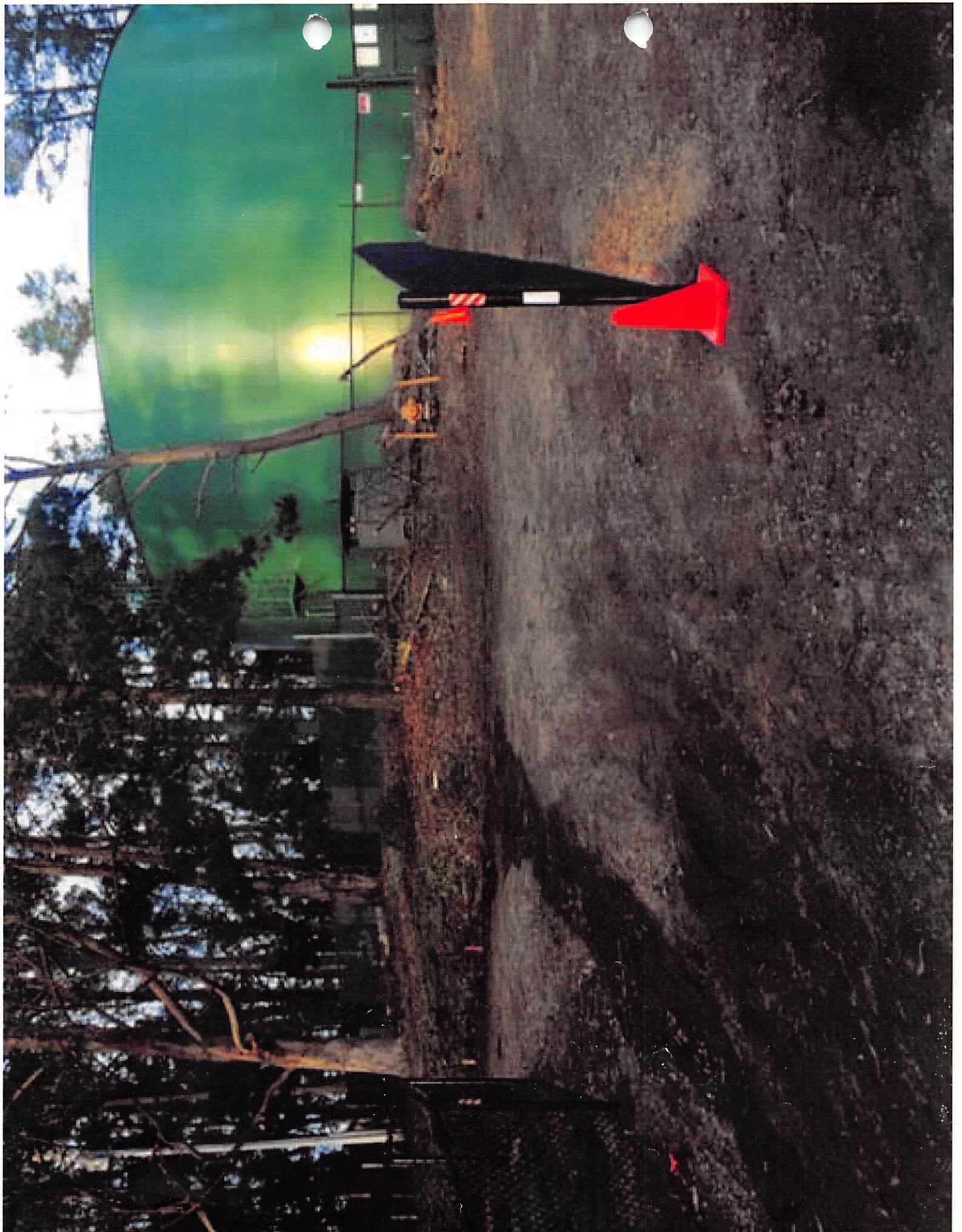
State

ZIP Code

Date Reported: 2017-02-17

Format: YYYY-MM-DD (e.g. 2009-07-04 for Independence Day)





Case Notes <u>V10 2017-00054</u>	
Date/CCO	Notes/Action taken
9-11-17	they have applied for the CDP.
10-25-17 JS	Property owner spoke with Joan Kling the Code Compliance Manager. He gave her a copy of notes in Accela that she stated it was a civil matter. She explained he needed a CDP and gave him copies of the LCP requiring the Coastal Development Permit and the meaning of exemption, and she showed him where he does not meet the exemption.
11-3-17 JS	Issued a N.O.V.
12-14-17	they need a CDP.
1-13-18 JK	Sumner sent email. Citations will start soon
1-25-18 PM	PUBLIC RECORDS REQUEST DOCS GIVE TO AMY OW
1-21-19 PM	PUBLIC RECORDS REQUEST; GIVE DOCS TO AMY OW

**Planning & Building Department**

455 County Center, 2nd Floor
Redwood City, California 94063
650/363-4161 Fax: 650/363-4849

Mail Drop PLN122
plngbldg@smcgov.org
www.co.sanmateo.ca.us/planning

SUMMARY OF CASE ACTIVITY**VIO2017-00054**

APN: 048076120

ADDRESS: MIRAMAR DR, HALF MOON BAY, CA 94019-0000

Activity	Date Assigned	Done By	Status	Status Date
Complaint Received	02/22/2017	Rita McLaughlin	Investigation	02/22/2017
Investigation	03/08/2017	Ruemel Panglao	Notes	03/08/2017
3/8/17 RSP - Applicant came to counter. Notified that fence requires a CDP.				
Investigation	09/21/2017	Ana Santiago	In Violation	03/14/2017
See Ruemel's notes on 3/8/17.				
Enforcement	04/07/2017	Ana Santiago	Complied	04/07/2017
Final Processing	04/07/2017	Ana Santiago	Workflow Closed	04/07/2017
Enforcement	09/21/2017	Ana Santiago	Notes	09/11/2017
They have applied for the CDP. It was deemed incomplete.				
Enforcement	10/25/2017	Ana Santiago	Notes	10/25/2017
Property owner spoke with Joan Kling the Code Compliance Manager. He gave her a copy of notes in Accela that she stated it was a civil matter. She explained he needed a CDP and gave him copies of the LCP requiring the Coastal Development Permit and the meaning of exemption, and she showed him where he does not meet the exemption.				
Enforcement	11/03/2017	Ana Santiago	Violation Notice Sent	11/03/2017
They have not completed the CPD for the fence. I issued the NOV.				
Enforcement	11/09/2017	Summer Burlison	Notes	11/09/2017
11/9/17 SSB - Owner came in with letter stating reasons why they don't believe they need a CDP including because the fence is less than 4' in height and non-masonry (it's chain link). He pointed to previous brochure given to him highlighting that building permit is not require for fence less than 6' in height.				
Enforcement	12/14/2017	Ana Santiago	Notes	12/14/2017
They need a CDP. They want to deny that they need one, and have submitted a letter stating so. I explained again they still need a CDP.				
Enforcement	09/13/2018	Summer Burlison	Notes	09/13/2018

Activity	Date Assigned	Done By	Status	Status Date
9/13/18 SSB - Emailed to TJ Singh, cc'd code compliance officer:				
Hello TJ,				
Code Compliance mentioned they are getting ready to issue a citation for the unpermitted fence installed along the access easement running through your property as there's been no confirmation that it has been removed and no application for a Coastal Development Permit (CDP) to seek legalization. It was agreed that I could reach out to you before a citation is issued (which carries citation fees) to try to get resolution (and avoid any citation fees for you!). Your options are below:				
<ol style="list-style-type: none"> 1. Remove the fence and call code compliance to site verify removal, which would address the violation and upon confirmation of removal, the violation case would be closed. 2. Apply for a CDP to legalize the fence, in which staff would likely recommend denial for the fence as it does not serve a permitted use on the property and detracts from the natural surrounding environment. A CDP would require a public hearing before the Planning Commission (PC) and the PC's decision is appealable. The CDP application filing fee for an after-the-fact CDP is approximately \$7,800. 				
One of the above options needs to be completed by Friday, September 28, 2018 in order to avoid the issuance of a citation by the Code Compliance Section.				
Regards, Summer				
	09/13/2018	Joan Kling	Notes	09/13/2018
Summer sent email to Singhs saying Code Compliance will soon issue Citations. Deadline is Sept. 28. Citations will be issued after that.				
Enforcement	09/27/2018	Camille Leung	Notes	09/27/2018
9/27/18 CML - I met with TJ and Tripp for the Pre App (PRE2018-00053). I gave them forms, fees, calendar, and told them that the County will not issue any permits, including Design Review, until the fence violation is resolved. I stated that the only way to resolve the violation is for the fence to be removed. As no permits for construction will be issued until the violation is resolved, the fence cannot be retained as a future fence for the residence or as a construction fence.				
They asked as to whether they can install 2 "no trespassing signs" in lieu of the fence. I said that this could potentially qualify for a CDX. County would need sign specs, post specs, overall height and location map. Prior to approval of any CDX, fence would have to be removed first.				
Enforcement	12/24/2018	Mike Schaller	Notes	12/24/2018
12/24/18 mjs - Property owner came in to make request to remove violation. Advised him to submit a letter stating his position and that would be forwarded to Camille or Summer who have been involved with this case previously. They can review and work with Code Enforcement regarding this request.				

Record Number

VIO2017-00054

Opened Date

02/22/2017



Record Status

Violation Notice Sent

Record Type

Planning/Zoning Violation/NA/NA

Project Name

ZONING

Description

Fences have been built on a vacant parcel that are obstructing access to the neighboring property (Fences are on Parcel 048-076-120 which appears to have the same address as Parcel 048-076-130)

[check spelling](#)

Assigned to Department Current Department

Planning ▼

Assigned to Staff Current User

Joan Kling ▼

Assigned Date

02/22/2017



Total Invoiced

0.00

Total Paid

0.00

Balance

0.00

Short Notes

Joan Kling

From: COB_201PLN
Sent: Thursday, January 26, 2017 10:22 AM
To: Joan Kling; Ana M. Santiago
Cc: Rita Chow
Subject: FW: Tad Sanders & 655 Miramar Parcel-2: Stop Harassing us with your illegal activities

From: Tejinder singh [mailto:tjsingh007@me.com]
Sent: Thursday, January 26, 2017 9:05 AM
To: Tad Sanders <tad@tsconsultingcpa.com>
Cc: COB_201PLN <COB_201PLN@smcgov.org>; Camille Leung <cleung@smcgov.org>
Subject: Tad Sanders & 655 Miramar Parcel-2: Stop Harassing us with your illegal activities

Dear Mr. Sanders,

Without prejudice, please treat this as a formal notice to stop harassing us and the neighbors with your recurring illegal acts.

On Saturday January 14th around 10am in the morning, we were informed by the neighbors that one of the women residing in your home at 655 Miramar Parcel-2 removed several Stakes installed by our Surveyor on our property with a large sledge hammer. When we arrived, she stopped. After we left, the neighbors heard the hammering again and had to call the Sheriff's Dept. This time this same woman had removed one of the stakes and installed it several feet away. She was working to move another stake when we arrived.

The Sheriff's Deputy had her put the stakes back.

Yesterday, January 25th, you had your surveyors dig holes on our property, behind our backs to move the original stakes. You know very well that your surveyors are welcome to plant their stakes but in no case are they allowed to dig holes on our property.

As I mentioned it to you through my several emails to you, I am looking to work with you and the owners of Parcel-2, to explore options that would work for everyone for the long-term.

To come up with workable alternatives, I have asked you the following and have received no response.

1. Does Parcel-2 plan to stay on the Septic Tank or have sewage;
2. Fire Dept needs;
3. Does Parcel-2 need to move the Powerlines underground.

You and the Owners of Parcel-2, have instead only embarked on escalating your illegal acts without regard of the law, or the authority of the County or the peace of the community.

We had to leave a customer meeting at work to stop your illegal grading without permits, behind our backs on December 12th when we were notified by the neighbors, and again had to take a day-off yesterday. We have realized that your sweet talk is a willful deception.

Please stop this harassment and intimidation to us and the neighboring community immediately.

Yours Sincerely

TJ Singh

655 Miramar Parcel-2

Rita McLaughlin

From: COB_201PLN
Sent: Friday, February 17, 2017 7:56 AM
To: Joan Kling; Ana M. Santiago
Cc: Rita McLaughlin
Subject: FW: illegal fence
Attachments: code violation complaint 021717.pdf; 4078.pdf; 4082.pdf

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Friday, February 17, 2017 7:45 AM
To: COB_201PLN <COB_201PLN@smcgov.org>
Subject: illegal fence

Thank you for your time

Tad Sanders, CPA
1360 19th Hole Drive, Suite 201
Windsor, CA 95492

Office 707-836-9077
Cell 707-696-9059
Fax 1-866-538-5325

Rita McLaughlin

From: COB_201PLN
Sent: Thursday, February 23, 2017 2:22 PM
To: Ana M. Santiago
Cc: Joan Kling; Rita McLaughlin
Subject: FW: VIO2017-00054
Attachments: 655 Miramar RS.pdf

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Thursday, February 23, 2017 11:31 AM
To: COB_201PLN <COB_201PLN@smcgov.org>
Subject: VIO2017-00054

Good morning,

I have some additional information I would like added to this complaint. I am the person who filed the original complaint. I would like to add the following:

1. The first attachment is a record of survey that our surveyor just prepared. I asked him to plot on the survey the fences TEG Partners illegally installed so we can see where they are at in relation to our easement. The fence that is along the easement boundary is, in fact, inside the easement and is not on the easement boundary. The survey shows that it encroaches the easement by 9/10ths of a foot or almost 11 inches in one location and is in the easement by 5/10ths of a foot or 6". Therefore there are sections of the fence clearly within the easement.
2. With the heavy rains this winter, our tenant cannot make it up the road because it is slick and muddy and no dangerous to traverse. She has to park below and walk up through the eucalyptus forest late at night with limbs falling, etc.

As I previously mentioned in my complaint, the Fire Marshal has told us he will not send a fire truck up the road now because the fences are in the way and it will damage their trucks. Therefore, our emergency access is significantly impaired.

Thank you for your time.

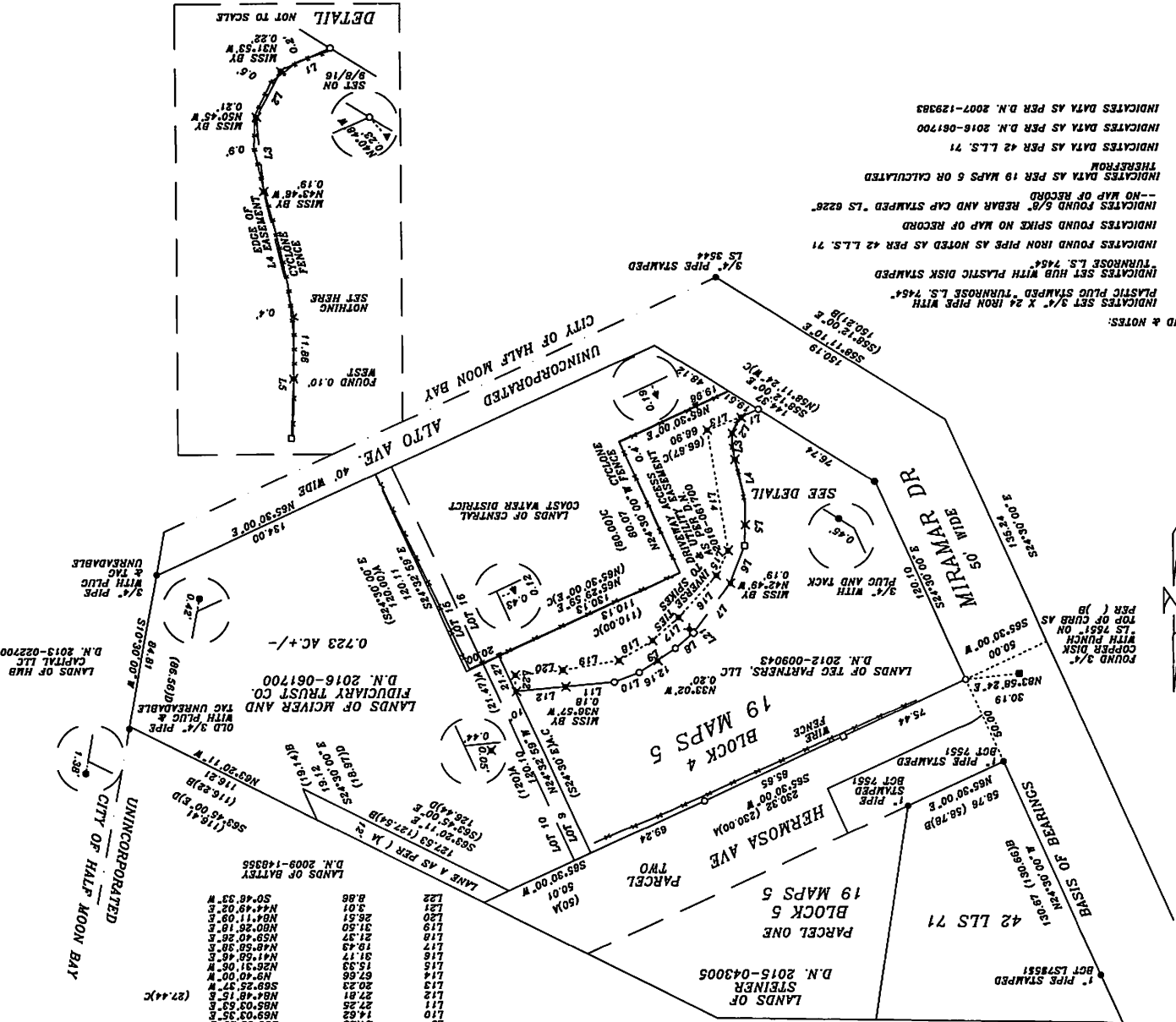
Tad Sanders, CPA
1360 19th Hole Drive, Suite 201
Windsor, CA 95492

Office 707-836-9077
Cell 707-696-9059
Fax 1-866-538-5325

SCALE: 1" = 40'

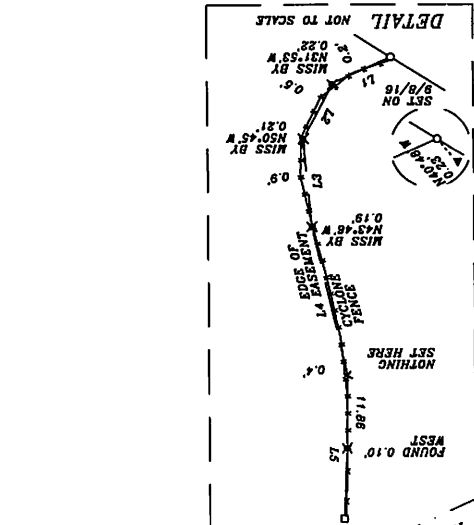
LEGEND & NOTES:

- () INDICATES SET 3/4" X 24 IRON PIPE WITH PLASTIC PLUG STAMPED "TURNROSE L.S. 7454"
- () INDICATES FOUND IRON PIPE AS NOTED AS PER 42 L.S. 71
- () INDICATES FOUND SPIKE NO MAP OF RECORD
- () INDICATES FOUND 6/8" REBAR AND CAP STAMPED "LS 8228"
- () INDICATES DATA AS PER 19 MAPS 6 OR CALCULATED
- () INDICATES DATA AS PER 42 L.S. 71
- () INDICATES DATA AS PER D.N. 2007-129383



LINE	DISTANCE	BEARING
L1	10.51	N65°58'46" W
L2	10.12	N29°02'05" E
L3	14.46	N5°24'29" W
L4	23.20	N1°37'05" W
L5	22.10	N21°30'20" E
L6	34.46	N35°47'03" E
L7	12.04	N40°41'54" E
L8	24.23	N56°58'25" E
L9	14.62	N69°03'35" E
L10	27.25	N65°08'53" E
L11	20.23	N58°25'37" W
L12	27.81	N54°48'15" E
L13	20.23	N58°25'37" W
L14	67.66	N7°40'00" W
L15	53.30	N29°31'05" W
L16	31.17	N41°58'46" E
L17	19.43	N48°58'38" E
L18	19.43	N59°40'26" E
L19	21.37	N59°40'26" E
L20	26.51	N54°11'09" E
L21	3.01	N44°49'02" E
L22	8.86	S0°46'33" W

UNINCORPORATED
CITY OF HALF MOON BAY
LANDS OF HUB CAPITAL LLC
D.N. 2013-022700
LANDS OF HUB
ACT THIS
DAY OF
THIS MAP HAS BEEN EXAMINED IN ACCORDANCE WITH
SECTION 8766 OF THE PROFESSIONAL LAND SURVEYORS
ACT THIS
DAY OF
2017.
L.S. 8763
CHRISTOPHER C. VANDREY
LICENSED LAND SURVEYOR



SURVEYOR'S STATEMENT
THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY
ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE
REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYORS
ACT AT THE REQUEST OF THE EDITH R. STERN TRUST
FBO SANDRA P. MEYER IN AUGUST 2016 & JANUARY 2017.
MICHAEL T. TURNROSE L.S. 7454
LICENSE EXPIRES 12-31-18
DATE

BASIS OF BEARINGS
THE BEARING NORTH 24°30'00" WEST BEING THE WEST-
LINE OF THAT PARCEL SHOWN ON VOLUME 42
OF L.S. MAPS 71 WAS TAKEN AS THE BASIS OF
BEARINGS FOR THIS MAP.

COUNTY SURVEYOR'S STATEMENT
THIS MAP HAS BEEN EXAMINED IN ACCORDANCE WITH
SECTION 8766 OF THE PROFESSIONAL LAND SURVEYORS
ACT THIS
DAY OF
2017.
CHRISTOPHER C. VANDREY
LICENSED LAND SURVEYOR
L.S. 8763

COUNTY RECORDER'S STATEMENT
FILED THIS
DAY OF
2017
AT THE REQUEST OF MICHAEL TURNROSE
FILE NO.
FEE
BY: _____
DEPUTY
MARK CHURCH, COUNTY RECORDER

RECORD OF SURVEY
R/S NO.
LANDS OF MEYER & FIDUCIARY TRUST CO.
D.N. 2016-081700
AND PORTION OF LANDS OF STEINER
--D.N. 2015-043005
BEING PORTIONS OF BLOCKS 4 AND 5 OF "MIRAMAR
TERRACE" BEING FILED IN BOOK 5 OF MAPS AT PAGE 19.
UNINCORPORATED, SAN MATEO COUNTY
CALIFORNIA
DATES OF SURVEY: AUG. 2016 & JAN. 2017
SCALE: 1" = 40'
TURNROSE LAND SURVEYING
RIPON, CA 95366
209.599.5100
BAY AREA 650.324.3316

SHEET 1 OF 1 SHEET
JOB NO. 16-24/16-28

Ana Santiago

From: Tad Sanders <tad@tsconsultingcpa.com>
Sent: Tuesday, March 14, 2017 3:52 PM
To: Ana M. Santiago
Subject: RE: VIO2017-00054

Thank you
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Tuesday, March 14, 2017 3:32 PM
To: Tad Sanders
Subject: RE: VIO2017-00054

Hello Tad,

It was closed accidently and was reopened. I still have the complaint regarding the fence.

Thanks

Ana

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Tuesday, March 14, 2017 3:22 PM
To: Ana M. Santiago <AMSantiago@smcgov.org>
Cc: Charlie Bronitsky <charlie@brewerfirm.com>
Subject: RE: VIO2017-00054

Hi Ana,
I just checked the website about the above referenced violation. I do not understand why this is an "invalid complaint". Can you help me understand why it is okay for our neighbor to put up a fence that impairs fire truck access to our property? The fire marshal, John Riddel, told our contractor he will not send a truck up the road.

Thanks
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Friday, February 24, 2017 7:57 AM
To: Tad Sanders
Subject: RE: VIO2017-00054

Hello Tad,

I have received the information and will go out next week.

Thank you

Ana M. Santiago

Senior Code Enforcement Officer III

amsantiago@smcgov.org



COUNTY OF SAN MATEO PLANNING AND BUILDING

Planning and Building Department

455 County Center, 2nd Floor

Redwood City, CA 94063

(650) 363-4825 T

(650) 363-4849 F

www.planning.smcgov.org

From: Tad Sanders [<mailto:tad@tsconsultingcpa.com>]

Sent: Thursday, February 23, 2017 10:06 PM

To: Ana M. Santiago <AMSantiago@smcgov.org>

Subject: FW: VIO2017-00054

Hi Ann,

I received your email from Rita McLaughlin and told her I would forward this email directly to you. I have some additional items I would like included in the above subject matter. I filed the complaint last week. Please let me know if you have any questions or concerns or if you would like to discuss this matter further.

Thank you for your time

Tad Sanders, CPA

1360 19th Hole Drive, Suite 201

Windsor, CA 95492

Office 707-836-9077

Cell 707-696-9059

Fax 1-866-538-5325

From: Tad Sanders [<mailto:tad@tsconsultingcpa.com>]

Sent: Thursday, February 23, 2017 11:31 AM



To: 'plngbldg@smcgov.org'

Subject: VIO2017-00054

Good morning,

I have some additional information I would like added to this complaint. I am the person who filed the original complaint. I would like to add the following:

1. The first attachment is a record of survey that our surveyor just prepared. I asked him to plot on the survey the fences TEG Partners illegally installed so we can see where they are at in relation to our easement. The fence that is along the easement boundary is, in fact, inside the easement and is not on the easement boundary. The survey shows that it encroaches the easement by 9/10ths of a foot or almost 11 inches in one location and is in the easement by 5/10ths of a foot or 6". Therefore there are sections of the fence clearly within the easement.

- 
- 
2. With the heavy rains this winter, our tenant cannot make it up the road because it is slick and muddy and no dangerous to traverse. She has to park below and walk up through the eucalyptus forest late at night with limbs falling, etc.

As I previously mentioned in my complaint, the Fire Marshal has told us he will not send a fire truck up the road now because the fences are in the way and it will damage their trucks. Therefore, our emergency access is significantly impaired.

Thank you for your time.

Tad Sanders, CPA
1360 19th Hole Drive, Suite 201
Windsor, CA 95492

Office 707-836-9077
Cell 707-696-9059
Fax 1-866-538-5325

Ana Santiago

From: Tad Sanders <tad@tsconsultingcpa.com>
Sent: Thursday, April 06, 2017 9:51 AM
To: Ana M. Santiago
Subject: RE: 655 Miramar, HMB

Thank you Ana,
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Thursday, April 06, 2017 9:09 AM
To: Tad Sanders
Subject: RE: 655 Miramar, HMB

Tad,

You would need to email Janneth, for your request. Her email address is jlujan@smcgov.org. Please give her the details what you are looking for.

Thank you
Ana M. Santiago
Senior Code Enforcement Officer III
amsantiago@smcgov.org



COUNTY OF SAN MATEO PLANNING AND BUILDING

Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
(650) 363-4825 T
(650) 363-4849 F
www.planning.smcgov.org

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Monday, April 03, 2017 8:26 AM
To: Ana M. Santiago <AMSantiago@smcgov.org>
Subject: RE: 655 Miramar, HMB

Hi Ana,
I spoke to Miles Hancock this morning about getting a copy of the file TEG Partners gave to Ron. Miles told me it was forwarded to code enforcement. Do I need to provide a request for information other than tis email?
Thank you
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Friday, March 31, 2017 4:12 PM
To: Tad Sanders
Subject: RE: 655 Miramar, HMB

Hello Tad,

Ron is a building inspector and I have forwarded your request to his manager Miles Hancock.

Thank you

Ana

From: Tad Sanders [<mailto:tad@tsconsultingcpa.com>]

Sent: Friday, March 31, 2017 3:44 PM

To: Ana M. Santiago <AMSantiago@smcgov.org>

Subject: 655 Miramar, HMB

Hi Ana,

I understand my clients neighbor, TEG Partners who own 048-076-120, filed a complaint against our permit today. The permit is PLN2016-00528. A code enforcement officer showed up at the site today and discussed and reviewed the permit and the completed work with our contractor. Your code enforcement officer told our contractor that everything they have done is fully within the scope of the permit and that we can proceed and complete the work which will probably go through next Tuesday.

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Thank you for your time

Tad Sanders, CPA
1360 19th Hole Drive, Suite 201
Windsor, CA 95492

Office 707-836-9077
Cell 707-696-9059
Fax 1-866-538-5325

Ana Santiago

From: Tad Sanders <tad@tsconsultingcpa.com>
Sent: Monday, April 10, 2017 12:49 PM
To: Ana M. Santiago
Subject: VIO2017-0054

Hi Ana,
Can you please let me know how this violation was resolved? I see that it appears to be closed online?
Thank you
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Thursday, April 06, 2017 9:09 AM
To: Tad Sanders
Subject: RE: 655 Miramar, HMB

Tad,

You would need to email Janneth, for your request. Her email address is jlujan@smcgov.org. Please give her the details what you are looking for.

Thank you
Ana M. Santiago
Senior Code Enforcement Officer III
amsantiago@smcgov.org



COUNTY OF SAN MATEO PLANNING AND BUILDING

Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
(650) 363-4825 T
(650) 363-4849 F
www.planning.smcgov.org

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Monday, April 03, 2017 8:26 AM
To: Ana M. Santiago <AMSantiago@smcgov.org>
Subject: RE: 655 Miramar, HMB

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Ana Santiago

From: Tad Sanders <tad@tsconsultingcpa.com>
Sent: Wednesday, April 19, 2017 1:32 PM
To: Ana M. Santiago
Subject: RE: VIO2017-0054

Thank you Ana,
Tad

From: Ana M. Santiago [mailto:AMSantiago@smcgov.org]
Sent: Wednesday, April 19, 2017 1:07 PM
To: Tad Sanders
Subject: RE: VIO2017-0054

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(650) 363-4825 T

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Fax 1-866-538-5325

Ruemel Panglao

From: Camille Leung
Sent: Thursday, September 21, 2017 9:34 AM
To: Dave Holbrook
Cc: Ana Santiago; Ruemel Panglao
Subject: RE: ATF CDP for Fences (Singhs)

I looked through all the PLN cases for 2017 since March (when Ruemel told them the fence needs a CDP). No PLN case/application. Lets turn up the heat.

From: Camille Leung
Sent: Thursday, September 21, 2017 9:28 AM
To: Dave Holbrook <dholbrook@smcgov.org>
Cc: Ana Santiago <AMSantiago@smcgov.org>
Subject: ATF CDP for Fences (Singhs)

Hi Dave,

I thought for sure the Singhs (property owners of vacant parcel next to 655 Miramar) applied for an ATF CDP for a the fence built without permits (VIO2017-00054). But it is not on the Parcel (048-076-120) or on 655 Miramar address..... Do you know whether they applied? And who planner is?

Ana was asking and Rob and I think its Summer, but we are not sure.....

Camille Leung, Senior Planner
Planning & Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
Phone - 650-363-1826
Fax – 650-363-4849

Ana Santiago

From: Tad Sanders <tad@tsconsultingcpa.com>
Sent: Monday, October 23, 2017 8:02 AM
To: Ana Santiago
Subject: RE: VIO2017-0054

Hi Ana,

I see that their CDP application was not complete. Don't they have a time frame they need to deal with this in? At this point, they have stalled doing anything for eight months. Not sure if you know but I live in Santa Rosa and, fortunately, our house did not burn down. With that said, fire safety and access are at the top of my mind. The fences that are the subject of the VIO2017-0054 clearly make 655 Miramar difficult for a fire truck to get to and I don't think they can get a fire truck up the road because the fences seriously limit the size vehicles that can traverse the road. Can you please outline the process for me so I can understand what to expect and when?

Thank you

Tad

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Thursday, September 21, 2017 8:48 AM
To: 'Ana M. Santiago'
Subject: RE: VIO2017-0054

Hi Ana,

Sorry I see that they have applied for the CDP. When will I receive notice of the hearing?

Thank you

Tad

From: Tad Sanders [mailto:tad@tsconsultingcpa.com]
Sent: Thursday, September 21, 2017 8:47 AM
To: 'Ana M. Santiago'
Subject: RE: VIO2017-0054

Hi Ana,

I am following up on the complaint we filed that is in the subject line. I just checked it online and it says under Enforcement that the status is "complied". The two fences in question are still standing and the owners have never obtained a CDP. Furthermore, lighting struck a tree adjacent to 048-076-120 on the water district's parcel. When Coastside Fire responded, the fences impaired their ability to fight the fire because it inhibited fire truck access. I have a call into Mark Mondragon now to discuss this issue with him.

Can you please let me know where this is at and what the next steps are?

Thank you

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To: Tad Sanders
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October 27, 2017

Based on the attached County Documents, I wanted to mention that a permit is only required for a masonry or a six feet high fence. The fence we are discussing is non-masonry and is only 4 feet high and as per the attached documents, does not require a permit.

You may also note the following:

1. Section 8.15 Coastal Views

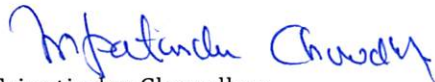
Prevent development (including buildings, structures, fences, unnatural obstructions, signs, and landscaping) from substantially blocking views to or along the shoreline from coastal roads, roadside rests and vista points, recreation areas, trails, coastal accessways, and beaches.

There is no such issue with our fence.

2. Chapter 13.20, COASTAL ZONE REGULATIONS, 13.20.061 Improvements to existing single-family residences exemption, makes reference to the "fence" permit exception.

"... no coastal development permit is required for improvements to existing single-family residences (including to fixtures and other structures directly attached to the residence; structures on the property normally associated with a single-family residence, such as garages, swimming pools in-ground and above-ground, hot tubs, fences, decks, storage sheds, and attached low-profile solar panels, and landscaping on the property, but not including guest houses or self-contained residential units). Allowed improvements that do not require a coastal development permit include additions of less than 500 square feet outside the appeal jurisdiction of the Coastal Commission, remodels, alterations, replacement of existing water storage tanks, wells or septic systems serving an existing single-family residence where there is no expansion of the replaced feature or its capacity, and new accessory structures except for self-contained residential units including second units (as defined in SCCC 13.10.700-S; see also SCCC 13.20.107 and 13.20.108)."

Thanks
Kind regards



Tripatinder Chowdhry
655 Miramar
Half Moon Bay
CA 94019

How to Apply for a Permit to Build a Fence

What kinds of permits do I need to build a fence?



Fences of any type exceeding 6 feet in height or masonry fences of any height will require a building permit. If the fence is less than 6 feet in height and is nonmasonry, you are not required to have a building permit, but you are still required to follow the county's planning regulations concerning fences. If the fence is in the public right of way, you will also need an encroachment permit from the Department of Public Works.

How do I apply for a permit?



Submit an application to Building Inspection at the Development Review Center. The application must identify the property, list the name of any architect or engineer who will work on the project, and describe the proposed work in detail. Along with that application, submit the following:

- ✓ A plot plan showing any driveway, walkway, parking area, wells, retaining walls, utilities, easements, trees, and other structures, as well as the location of the proposed fence
- ✓ Construction details showing all structural elements.

A separate handout entitled Plan Requirements describes requirements in greater detail and gives you examples of how they should be drawn. This handout is not specific to fences.

Is there any limit on the height of fences?

In the front yard area of most properties, you may have a fence, wall, or hedge as high as 4 feet. In the side and back yard areas that are not on corner lots, you may have a fence, wall, or hedge as high as 6 feet, as long as it doesn't extend into the front yard.

On large parcels, located in districts where 20,000 sq. ft. building site is required, with 100 ft. of street frontage, a 6 foot fence is allowed in the front yard.

On parcels which have an elevation shift at the property line, the owner of the lower property may construct a retaining wall/fence combination of up to 12 feet. The upper property owner may do the same only with the consent of the lower property owner.

On parcels located outside the Coastal Zone, the Planning Administrator may approve an exception to allow fences or hedges to exceed the height limits set forth in Section 6412 by up to two (2) feet. Additional information regarding Fence Height Exceptions may be obtained at the Planning Counter.

At what point should I call for an inspection of my project?



During the project, you should request an inspection of the foundation or post holes. After you have completed the project, you should request a final inspection.

What fees must I pay?



You must pay Building, Planning, and filing fees, and possibly a plan check fee.

What's the next step in this process?



Read the pamphlet General Procedures When You Apply for a Planning or Building Permit. This pamphlet explains the general procedures for applying for a permit, paying fees, calling for inspections, and other related matters. Then you should also review the following documents, which contain other information that you may need:

How to Apply for Design Review

Section 6412, San Mateo County Zoning Regulations: Fences

Section 6412.2, San Mateo County Zoning Regulations: Fence Height Exceptions

How to Apply for an Encroachment Permit

After you have become familiar with these documents, we recommend that you prepare some very preliminary plans and bring them to the DRC counter so that we can review them. An informal meeting at this stage may save you considerable time and money later on.

If you are new to San Mateo County, you may also wish to make an appointment to meet with staff as part of the County's Early Assistance Meeting Program. Early assistance meetings are designed to acquaint owner/builders, contractors, architects, and other professionals who are new to the area or are unfamiliar with our permit system, with the different agencies involved, and the various costs and requirements. There is no charge for the meeting, which you can schedule by calling (650) 363-1825.

Special Neighbor Considerations

Even though fences are a somewhat minor form of development, they are often the subject of great contention between neighbors. The Division recommends that you consult with your neighbors before you add new fences or modify existing structures.



VIO: 2017-00054

NOTICE OF VIOLATION

COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT
CODE ENFORCEMENT DIVISION, 455 COUNTY CENTER
REDWOOD CITY, CA 94063 (650)363-4825

DATE Novemeber 3, 2017

TIME 10:30 AM

An inspection of the premises located at 655 Mirmar Dr. in the County of San Mateo revealed the following San Mateo Code violation(s)

Name of Property Owner: **TEG Partners, LLC**

Address if Different Than Violation(s): **16 Terrace Ave, Half Moon Bay, Ca 94019**

THE VIOLATION(S) MUST BE CORRECTED BY November 17, 2017

A REINSPECTION WILL BE MADE ON OR AFTER THE CORRECTION DATE TO VERIFY COMPLIANCE. SEE REVERSE SIDE FOR FAILURE TO COMPLY NOTICE

SECTION(s) VIOLATED Please note items checked below for compliance requirements.

- ☐ **SMC sec 7.60.140 Inoperative, wrecked, or dismantled vehicle(s), trailer(s), or boat(s):** Remove all inoperable, wrecked, dismantled, and/or not currently registered vehicles from property or relocate into fully enclosed structure. DO NOT relocate onto public street.
- ☐ **SMC sec 1.08.040 Garbage, litter, debris, junk, lumber, broken/discarded furnitue** Remove all accumulation of garbage, litter, debris, junk, lumbr, broken/discarded furniture and/or household items, including _____
- ☐ **SMC sec 1.08.040 Overgrown Vegetation:** Remove any overgrown and/or dead vegetation, including weeds, tall grass etc.
- ☒ **SMC sec 6412(a)(b) Fences, walls, and hedges shall not exceed four (4) ft. in height in front yard and six (6) ft. in height in year yard areas:** You must reduce fence, wall, and/or hedge to not exceed the required height limitations.
- ☐ **SMC sec 8602.0 Excavating, grading, filling, and/or land clearing without an approved grading permit is prohibited:** Immediately cease all work, apply for and obtain a grading permit with the Planning Department.
- ☐ **SMC sec 11.051 & 12.020. Permit Required to cut, remove, destroy any significant tree, whether indigenous or exotic, on any private property:** You must apply for and obtain an after the fact tree-cutting permit with the Planning Department.
- ☒ **Contact the San Mateo County Planning Dept. at the above address or (650) 363-1825**
- ☒ **Other** You must complete the application for the CDP (Coast Development Permit)
- ☐ **Other** _____

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on the date shown above.

Ana Santiago

Ana Santiago

SIGNATURE / PRINT NAME OF ISSUING OFFICER

White (responsible person)

Yellow (file)

ADMINISTRATIVE CITATIONS

PLEASE READ CAREFULLY

AVISO IMPORTANTE: SI DESEA UNA TRADUCCIÓN, FAVOR DE LLAMAR AL NÚMERO (650) 363-4825

San Mateo County Code of Ordinances Section 1.40.050 provides for the issuance of Administrative Citations for violations of the Code. There are four levels of citations that may be issued progressively for a violation. The levels, as indicated on the front of the citation, are a Warning, a First Citation - \$100, a Second Citation - \$200, and a Third and subsequent Citations - \$500 for violations of the same San Mateo County code section within a 12-month period. Fines are per violation and are cumulative.

A. RIGHTS OF APPEAL

You have the right to contest the fact that the violation existed or that you are not the responsible party for said violation. The appeal must be made within 14 days from the date of the Administrative Citation. Within 14 days of issuance of the citation, you must submit a Request for Hearing Form along with a processing fee and an advance deposit of the Administrative Citation penalty.

A Request for Hearing Form may be obtained from the Planning and Building Department and the person specified on the Administrative Citation. The Request for Hearing Form shall include a brief statement of material facts supporting the appellant's claim that no violation occurred or no penalties or other remedies shall be imposed.

A valid and complete Request for Hearing will result in an Administrative Appeal Hearing.

A warning, if issued, does not incur a fine and, therefore, cannot be appealed.

B. HOW TO PAY FINE

The amount of the fine is indicated on the front of the administrative citation and is due within 14 days of the issue date of the citation. You may pay by mail or in person. Payment should be made by credit card, personal check, cashier's check, or money order payable to the County of San Mateo. Payment should be made at the address below. Please write the citation number on your check or money order.

County of San Mateo
Planning and Building Department
455 County Center 2nd floor
Redwood City, CA 94063
Attention: Code Compliance / Administrative Citations

Payment of any fine shall not excuse the failure to correct the violation nor shall it stop further enforcement by the County.

C. CONSEQUENCES FOR FAILURE TO PAY THE FINE

If the fine is not paid within 14 days of the issue date of the citation, the County may collect any past due administrative citation penalty, late payment charge, and costs of collection by use of any and all available legal means.

D. CONSEQUENCES OF FAILURE TO CORRECT VIOLATIONS

There are numerous other enforcement options that may be used to encourage correction of violations. These options include, but are not limited to: criminal prosecution, civil litigation, abatement, recording the violation with the County Recorder, and forfeiture of certain benefits for substandard residential rental property.

If you need further information about the violation and/or how to comply, please call the officer designated on the front of the citation.

AVISO IMPORTANTE: SI DESEA UNA TRADUCCIÓN, FAVOR DE LLAMAR AL NÚMERO (650) 363-4825

7009 2820 0001 6648 7639

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To	TEG PARTNERS, LLC
Street, Apt. No., or PO Box No.	18 TERRACE DR
City, State, ZIP+4	Half Moon Bay, CA 94019

PS Form 3800, August 2006

See Reverse for Instructions



County of San Mateo

Planning & Building Department

455 County Center, 2nd Floor
Redwood City, California 94063
650/363-4161 Fax: 650/363-4849

Mail Drop PLN122
plngbldg@smcgov.org
www.co.sanmateo.ca.us/planning

VIO2017-00054

Summary of Case Activity

Activity	Date Assigned	Done By	Status	Status Date
Enforcement	04/07/2017	Ana Santiago	Complied	04/07/2017
Final Processing	04/07/2017	Ana Santiago	Workflow Closed	04/07/2017
Investigation civil issue. Ok to close per Joan.	03/14/2017	Ana Santiago	Invalid Complaint	03/14/2017
Investigation 3/8/17 RSP - Applicant came to counter. Notified that fence requires a CDP.	03/08/2017	Ruemel Panglao	Notes	03/08/2017
Complaint Received	02/22/2017	Rita McLaughlin	Investigation	02/22/2017

455 County Center, Redwood City, CA 94063
P (650) 363-4161 | F (650) 363-4849

Planning and Building Department

VIO:

VIO 2017-00054

Assigned to:

ANA SANTIAGO

Code Violation Complaint Form (All Items Must Be Completed)

1. Violation Type:



Zoning



Nuisance



Abandoned Vehicles on Private Property



Grading



Tree Removal



Other

Details of Complaint:

Please see Attached Document for Details - page 2-of-2

RECEIVED
2017 NOV 15 P 5:22
SAN MATEO COUNTY
PLANNING AND BUILDING
DEPARTMENT

2. Location of Alleged Violation:

655 Miramar Drive - Parcel 2

Address

Half Moon Bay, CA 94019

City

State

ZIP Code

Assessor Parcel Number (APN):

048076130

APN is a 9 digit (e.g. 004050570) number that identifies a property.
(DO NOT USE CHARACTERS OR SPACES).

3. Alleged Violators:

Sandra McIver/Tad Sanders

Name

655 Miramar Drive - Parcel 2

Phone (e.g. 650-363-4161)

Address

Half Moon Bay

CA

94019

City

State

ZIP Code

4. Complainant Information:

Tripatinder Chowdhry

650-281-8747

Name

655 Miramar Drive - Parcel -1

Phone (e.g. 650-363-4161)

Address

Half Moon Bay

CA

City

State

ZIP Code

Date Reported:

Format: YYYY-MM-DD (e.g. 2009-07-04 for Independence Day)

From:
Tripatinder Chowdhry
Phone: 650-281-8747
TEG Partners
November 15, 2017

Dear Code Enforcement Officer:

The owner of APN # 048-076-130 is in Violation of SMC sec 6412.

The owner has erected about a 7 feet fence, at their front yard.

We own the adjacent land and are in the process of legally continuing to maintain a prescriptive easement over APN 048-076-130. The fence is blocking us and every emergency vehicle from freely making a U-Turn.

This 7 feet fence has created a safety hazard and has blocked/obstructed our and Emergency vehicle U-turn access which each have been doing for at least the last 7 years.

We request an immediate remedy so that all the vehicles, including ours, law enforcement and emergency vehicles, could freely perform a U-Turn.

Kind Regards



Tripatinder Chowdhry

RECEIVED
2017 NOV 15 P 5:20
SAN MATEO COUNTY
PLANNING AND BUILDING
DEPARTMENT

Diana Higuera

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 5:16 PM
To: Nicole Campbell
Cc: Annabelle Gaiser
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

My attempt to email you the 10 files referred to below appears to have been unsuccessful. They are now posted at the following one drive site: https://smcgov-my.sharepoint.com/:f:/g/personal/lshearer_smcgov_org/Eg8P0HeLwtVPmzr0TAhEwpMBNuFEV0hVJH58U8Ogdqm5Ww?e=bloepX, which you should be able to access with your email address. (Thank you, Annabelle!)

Please see my email below for further details.

Melissa

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 4:44 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I have attached 10 additional files containing records responsive to your request for records related to VIO2017-00054. Please note that I have determined that certain portions of records are not subject to disclosure under the PRA, because the records constitute records, the disclosure of which is exempted pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege (Cal. Gov. Code § 6254(k)). I have redacted the exempt records accordingly.

We will continue to search for, review, and produce records responsive to your requests. I will provide you with a further update no later than next week.

Feel free to contact me with questions.

Thanks,

Melissa

From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Monday, April 26, 2021 10:05 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell

Katzoff & Riggs LLP

1500 Park Avenue, Suite 300

Emeryville, CA 94608

(510) 588-5178

www.katzoffriggs.com

-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, April 23, 2021 3:47 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Friday, April 23, 2021 10:06 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

I hope you have been well. I am writing to check in with you. We are expecting an initial production from your office today.

Best,

Nicole Campbell

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Monday, April 12, 2021 6:07 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Wednesday, April 7, 2021 11:23 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following: Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)

Tree removal permit application (PLN2021-00090) (2021 to present).

Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)

Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).

Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)

County's handling of any other notices of violation regarding the TEG Property. (2012 to present).

Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell

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1500 Park Avenue, Suite 300

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, March 26, 2021 2:37 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the "TEG Property" have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that "reasonably describes an identifiable record or records." Cal. Gov't Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos

Deputy County Counsel

San Mateo County Counsel's Office

400 County Center, Sixth Floor

Redwood City, California 94063

650.363.4753

mandrikopoulos@smcgov.org

Diana Higuera

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 9:27 AM
To: Melissa Andrikopoulos
Cc: Annabelle Gaiser
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Best,

Nicole Campbell
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Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

I received the 10 files. Thank you.

I look forward to receiving your update next week.

Best,

Nicole Campbell
Katzoff & Riggs LLP
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Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

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From: Nicole Campbell <ncampbell@katzoffriggs.com>
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To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
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I appreciate your assistance with the public records request.

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Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
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To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
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Hi Melissa,

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Best,

Nicole Campbell
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To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

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We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Wednesday, April 7, 2021 11:23 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)

Tree removal permit application (PLN2021-00090) (2021 to present).

Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)

Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).

Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastsides Water District in 2017. (2012 to present.)

County's handling of any other notices of violation regarding the TEG Property. (2012 to present).

Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, March 26, 2021 2:37 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the "TEG Property" have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that "reasonably describes an identifiable record or records." Cal. Gov't Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos
Deputy County Counsel
San Mateo County Counsel's Office
400 County Center, Sixth Floor
Redwood City, California 94063
650.363.4753
mandrikopoulos@smcgov.org

Diana Higuera

From: Melissa Andrikopoulos
Sent: Friday, May 14, 2021 2:52 PM
To: Nicole Campbell
Cc: Annabelle Gaiser
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Unfortunately, I'm still reviewing the next set of potentially responsive records, and I don't expect I'll be able to produce documents to you until next week.

I did have a question regarding the TEG Property request. You asked for "[c]ommunications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)." The PRA requires us to allow inspection of a record in response to a request that reasonably describes an identifiable record. This particular request does not reasonably describe an identifiable record, given the ambiguity regarding what might constitute "harassment." Please let me know if there are any more specifics that would help us identify the record you are seeking.

And last, would it be possible for you to provide a similar focused list of items you are seeking for the 18 Terrace Avenue PRA? I think we are close to concluding our search on the TEG Property, and expect staff will be able to start searching for records on the 18 Terrace Avenue PRA next week.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 9:27 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
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Best,

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Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
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From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, April 26, 2021 10:05 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, April 23, 2021 3:47 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, April 23, 2021 10:06 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

I hope you have been well. I am writing to check in with you. We are expecting an initial production from your office today.

Best,

Nicole Campbell
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1500 Park Avenue, Suite 300
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Monday, April 12, 2021 6:07 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, April 7, 2021 11:23 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)

Tree removal permit application (PLN2021-00090) (2021 to present).

Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)

Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).

Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)

County's handling of any other notices of violation regarding the TEG Property. (2012 to present).

Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, March 26, 2021 2:37 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the "TEG Property" have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that "reasonably describes an identifiable record or records." Cal. Gov't Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos

Deputy County Counsel

San Mateo County Counsel's Office

400 County Center, Sixth Floor

Redwood City, California 94063

650.363.4753

mandrikopoulos@smcgov.org

Diana Higuera

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 3:31 PM
To: Melissa Andrikopoulos
Cc: Annabelle Gaiser
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

Thank you. Based on other CPRA requests we know the county's production is still missing some e-mails between the county and the owners of the TEG Property regarding the fence violation as well as between the county and CalFire regarding the fence violation. Please confirm the next set of responsive records will include additional documents regarding the fence violation. There may be additional responsive e-mails regarding the fence violation that have not been produced so far by any public entity.

Harassment would constitute intimidation through shouting, falsely accusing county officials of behavior such as stealing, physically obstructing county official's from performing their duties on or near the TEG Property, or physically obstructing access to any easement across the TEG Property. We are also interested in any complaints submitted by the neighbors about the number and proximity of cameras installed by the owners of the TEG Property which invades the privacy of the neighbors by allowing them to surveil the neighbors, most of whom have children.

With respect to 18 Terrace Avenue, we are most interested in any notices of violation issued to the owner or neighbor complaints and all related notes and records about the owner's response and the county's handling of the violation or complaint. We are informed and believe the owners may have engaged in illegal grading at the property and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Best,

Nicole Campbell
Katzoff & Riggs LLP
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, May 14, 2021 2:52 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Unfortunately, I'm still reviewing the next set of potentially responsive records, and I don't expect I'll be able to produce documents to you until next week.

I did have a question regarding the TEG Property request. You asked for "[c]ommunications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)." The PRA requires us to allow inspection of a record in response to a request that reasonably describes an identifiable record. This particular request does not reasonably describe an identifiable record, given the ambiguity regarding what might constitute "harassment." Please let me know if there are any more specifics that would help us identify the record you are seeking.

And last, would it be possible for you to provide a similar focused list of items you are seeking for the 18 Terrace Avenue PRA? I think we are close to concluding our search on the TEG Property, and expect staff will be able to start searching for records on the 18 Terrace Avenue PRA next week.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Friday, May 14, 2021 9:27 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

May we have an update on the production?

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Nicole Campbell
Sent: Wednesday, May 5, 2021 11:34 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

I received the 10 files. Thank you.

I look forward to receiving your update next week.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Tuesday, May 4, 2021 5:16 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

My attempt to email you the 10 files referred to below appears to have been unsuccessful. They are now posted at the following one drive site: https://smcgov-my.sharepoint.com/:f/g/personal/lshearer_smcgov_org/Eg8P0HeLwtVPmzr0TAhEwpMBNuFEV0hVJH58U8Oqdqm5Ww?e=bloepX, which you should be able to access with your email address. (Thank you, Annabelle!)

Please see my email below for further details.

Melissa

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 4:44 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I have attached 10 additional files containing records responsive to your request for records related to VIO2017-00054. Please note that I have determined that certain portions of records are not subject to disclosure under the PRA, because the records constitute records, the disclosure of which is exempted pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege (Cal. Gov. Code § 6254(k)). I have redacted the exempt records accordingly.

We will continue to search for, review, and produce records responsive to your requests. I will provide you with a further update no later than next week.

Feel free to contact me with questions.

Thanks,
Melissa

From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, April 26, 2021 10:05 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, April 23, 2021 3:47 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, April 23, 2021 10:06 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

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Best,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Monday, April 12, 2021 6:07 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, April 7, 2021 11:23 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)
Tree removal permit application (PLN2021-00090) (2021 to present).
Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)
Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).
Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastsides Water District in 2017. (2012 to present.)
County's handling of any other notices of violation regarding the TEG Property. (2012 to present).
Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, March 26, 2021 2:37 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the "TEG Property" have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that "reasonably describes an identifiable record or records." Cal. Gov't Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos
Deputy County Counsel
San Mateo County Counsel's Office
400 County Center, Sixth Floor

Redwood City, California 94063

650.363.4753

mandrikopoulos@smcgov.org

Diana Higuera

From: Melissa Andrikopoulos
Sent: Thursday, May 20, 2021 10:34 AM
To: Nicole Campbell
Cc: Annabelle Gaiser; Raj Deol
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good morning, Nicole,

We have another set of responsive, non-exempt records available for your review. The files are quite large, so we have made them available at this link: https://smcgov-my.sharepoint.com/:f/g/personal/rdeol_smcgov_org/ElgOjFkOs7pEvkNLjDRV5hIBM1Ffunr6zqXlkKvNQVOboA?e=9ff9Hr. You will need to enter your email address. Let me know if you have any problems accessing the files.

We continue to locate and review records in response to your request. I will provide an additional update next week.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 3:31 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

Thank you. Based on other CPRA requests we know the county's production is still missing some e-mails between the county and the owners of the TEG Property regarding the fence violation as well as between the county and CalFire regarding the fence violation. Please confirm the next set of responsive records will include additional documents regarding the fence violation. There may be additional responsive e-mails regarding the fence violation that have not been produced so far by any public entity.

Harassment would constitute intimidation through shouting, falsely accusing county officials of behavior such as stealing, physically obstructing county official's from performing their duties on or near the TEG Property, or physically obstructing access to any easement across the TEG Property. We are also interested in any complaints submitted by the neighbors about the number and proximity of cameras installed by the owners of the TEG Property which invades the privacy of the neighbors by allowing them to surveil the neighbors, most of whom have children.

With respect to 18 Terrace Avenue, we are most interested in any notices of violation issued to the owner or neighbor complaints and all related notes and records about the owner's response and the county's handling of the violation or complaint. We are informed and believe the owners may have engaged in illegal grading at the property and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Best,

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, May 14, 2021 2:52 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Unfortunately, I'm still reviewing the next set of potentially responsive records, and I don't expect I'll be able to produce documents to you until next week.

I did have a question regarding the TEG Property request. You asked for "[c]ommunications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder 'TJ' Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)." The PRA requires us to allow inspection of a record in response to a request that reasonably describes an identifiable record. This particular request does not reasonably describe an identifiable record, given the ambiguity regarding what might constitute "harassment." Please let me know if there are any more specifics that would help us identify the record you are seeking.

And last, would it be possible for you to provide a similar focused list of items you are seeking for the 18 Terrace Avenue PRA? I think we are close to concluding our search on the TEG Property, and expect staff will be able to start searching for records on the 18 Terrace Avenue PRA next week.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 9:27 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

May we have an update on the production?

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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From: Nicole Campbell
Sent: Wednesday, May 5, 2021 11:34 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

I received the 10 files. Thank you.

I look forward to receiving your update next week.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
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-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Tuesday, May 4, 2021 5:16 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

My attempt to email you the 10 files referred to below appears to have been unsuccessful. They are now posted at the following one drive site: https://smcgov-my.sharepoint.com/:f:/g/personal/lshearer_smcgov_org/Eg8P0HeLwtVPmzr0TAhEwpMBNuFEV0hVJH58U8Ogdqm5Ww?e=bloepX, which you should be able to access with your email address. (Thank you, Annabelle!)

Please see my email below for further details.

Melissa

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 4:44 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I have attached 10 additional files containing records responsive to your request for records related to VIO2017-00054. Please note that I have determined that certain portions of records are not subject to disclosure under the PRA, because the records constitute records, the disclosure of which is exempted pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege (Cal. Gov. Code § 6254(k)). I have redacted the exempt records accordingly.

We will continue to search for, review, and produce records responsive to your requests. I will provide you with a further update no later than next week.

Feel free to contact me with questions.

Thanks,
Melissa

From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, April 26, 2021 10:05 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, April 23, 2021 3:47 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, April 23, 2021 10:06 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Melissa,

I hope you have been well. I am writing to check in with you. We are expecting an initial production from your office today.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Monday, April 12, 2021 6:07 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, April 7, 2021 11:23 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)

Tree removal permit application (PLN2021-00090) (2021 to present).

Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)

Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).

Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)

County's handling of any other notices of violation regarding the TEG Property. (2012 to present).

Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, March 26, 2021 2:37 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the “TEG Property” have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that “reasonably describes an identifiable record or records.” Cal. Gov’t Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos
Deputy County Counsel
San Mateo County Counsel's Office
400 County Center, Sixth Floor
Redwood City, California 94063
650.363.4753
mandrikopoulos@smcgov.org

Diana Higuera

From: Melissa Andrikopoulos
Sent: Wednesday, June 2, 2021 10:11 AM
To: Nicole Campbell
Cc: Annabelle Gaiser; Raj Deol; Lisa Aozasa
Subject: RE: PRA request re 18 Terrace Ave and TEG Property
Attachments: PRE 2018-00053 Summary of Case Activity.pdf; PRE 2018-00053 Title Page.pdf; RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I'm attaching the case activity report for PRE2018-00053. I believe I already provided the case activity reports for PLN2018-00426 (see email attached). On the tree removal permit (PLN2021-00090), it looks like we provided all the related communications, but not the case activity report. Will aim to get you that asap.

Lisa and I are looking forward to discussing the PRA with you later today.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 28, 2021 3:05 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

Thanks for the call today. I am available next week for a call with you and Ms. Aozasa to further discuss the parameters of the records request.

As discussed, I am attaching an e-mail between Lisa Aozasa and John Riddell of Cal Fire regarding the illegal fence on TEG's Miramar property that we obtained from a different records request. We'd request that the county take a second look for e-mails regarding the fence violation during this time period.

We also request a case activity report for the tree permit if one exists.

We are waiting next on records regarding PLN2018-00426, then PRE2018-00003. Would it be possible to obtain a copy of the case activity reports for these applications pending a more complete production?

Thank you,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608

(510) 588-5178

www.katzoffriggs.com

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, May 28, 2021 1:38 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Yes; I can try you around 2:30, if that works for you.

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 28, 2021 11:10 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

Are you available to speak today about the status of production? You can call me at 415-312-6345.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Thursday, May 20, 2021 10:34 AM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good morning, Nicole,

We have another set of responsive, non-exempt records available for your review. The files are quite large, so we have made them available at this link: https://smcgov-my.sharepoint.com/:f:/g/personal/rdeol_smcgov_org/ElgOjFkOs7pEvkNLjDRV5hIBM1Ffunr6zqXlkKvNQVOboA?e=9ff9Hr. You will need to enter your email address. Let me know if you have any problems accessing the files.

We continue to locate and review records in response to your request. I will provide an additional update next week.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 3:31 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

Thank you. Based on other CPRA requests we know the county's production is still missing some e-mails between the county and the owners of the TEG Property regarding the fence violation as well as between the county and CalFire regarding the fence violation. Please confirm the next set of responsive records will include additional documents regarding the fence violation. There may be additional responsive e-mails regarding the fence violation that have not been produced so far by any public entity.

Harassment would constitute intimidation through shouting, falsely accusing county officials of behavior such as stealing, physically obstructing county official's from performing their duties on or near the TEG Property, or physically obstructing access to any easement across the TEG Property. We are also interested in any complaints submitted by the neighbors about the number and proximity of cameras installed by the owners of the TEG Property which invades the privacy of the neighbors by allowing them to surveil the neighbors, most of whom have children.

With respect to 18 Terrace Avenue, we are most interested in any notices of violation issued to the owner or neighbor complaints and all related notes and records about the owner's response and the county's handling of the violation or complaint. We are informed and believe the owners may have engaged in illegal grading at the property and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, May 14, 2021 2:52 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Unfortunately, I'm still reviewing the next set of potentially responsive records, and I don't expect I'll be able to produce documents to you until next week.

I did have a question regarding the TEG Property request. You asked for "[c]ommunications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder 'TJ' Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)." The PRA requires us to allow inspection of a record in response to a request that reasonably describes an identifiable record. This particular request does not reasonably describe an identifiable record, given the ambiguity regarding what might constitute "harassment." Please let me know if there are any more specifics that would help us identify the record you are seeking.

And last, would it be possible for you to provide a similar focused list of items you are seeking for the 18 Terrace Avenue PRA? I think we are close to concluding our search on the TEG Property, and expect staff will be able to start searching for records on the 18 Terrace Avenue PRA next week.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Friday, May 14, 2021 9:27 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

May we have an update on the production?

Best,

Nicole Campbell
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1500 Park Avenue, Suite 300

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From: Nicole Campbell
Sent: Wednesday, May 5, 2021 11:34 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

I received the 10 files. Thank you.

I look forward to receiving your update next week.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Tuesday, May 4, 2021 5:16 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

My attempt to email you the 10 files referred to below appears to have been unsuccessful. They are now posted at the following one drive site: https://smcgov-my.sharepoint.com/:f/g/personal/lshearer_smcgov_org/Eg8P0HeLwtVPmzr0TAhEwpMBNuFEV0hVJH58U8Ogdqm5Ww?e=bloepX, which you should be able to access with your email address. (Thank you, Annabelle!)

Please see my email below for further details.

Melissa

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 4:44 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I have attached 10 additional files containing records responsive to your request for records related to VIO2017-00054. Please note that I have determined that certain portions of records are not subject to disclosure under the PRA, because the records constitute records, the disclosure of which is exempted pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege (Cal. Gov. Code § 6254(k)). I have redacted the exempt records accordingly.

We will continue to search for, review, and produce records responsive to your requests. I will provide you with a further update no later than next week.

Feel free to contact me with questions.

Thanks,
Melissa

From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, April 26, 2021 10:05 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell
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www.katzooffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, April 23, 2021 3:47 PM
To: Nicole Campbell <ncampbell@katzooffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzooffriggs.com>
Sent: Friday, April 23, 2021 10:06 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

I hope you have been well. I am writing to check in with you. We are expecting an initial production from your office today.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Monday, April 12, 2021 6:07 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Wednesday, April 7, 2021 11:23 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)

Tree removal permit application (PLN2021-00090) (2021 to present).

Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)

Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).

Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)

County's handling of any other notices of violation regarding the TEG Property. (2012 to present).

Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Friday, March 26, 2021 2:37 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the "TEG Property" have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that "reasonably

describes an identifiable record or records.” Cal. Gov’t Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos
Deputy County Counsel
San Mateo County Counsel's Office
400 County Center, Sixth Floor
Redwood City, California 94063
650.363.4753
mandrikopoulos@smcgov.org

Diana Higuera

From: Melissa Andrikopoulos
Sent: Wednesday, June 2, 2021 10:21 AM
To: Nicole Campbell
Cc: Annabelle Gaiser; Raj Deol; Lisa Aozasa
Subject: RE: PRA request re 18 Terrace Ave and TEG Property
Attachments: PLN 2007-00153 Doc2.pdf; PLN 2007-00153 Doc1.pdf; PLN2007-00153 Summary of Case Activity.pdf; PLN 2007-00153 Title Page.pdf; PLN 2009-00069 Summary of Case Activity.pdf; PLN 2009-00069 Title Page.pdf; PLN 2009-00069 Parcel Tag Custom.pdf; PLN 2009-00069 Parcel Tag Easement.pdf

Nicole,

One more installment of responsive documents for you (8 PDFs for PLN2007-00153 and PLN2009-00069).

Melissa

From: Melissa Andrikopoulos
Sent: Wednesday, June 2, 2021 10:11 AM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>; Lisa Aozasa <laozasa@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I'm attaching the case activity report for PRE2018-00053. I believe I already provided the case activity reports for PLN2018-00426 (see email attached). On the tree removal permit (PLN2021-00090), it looks like we provided all the related communications, but not the case activity report. Will aim to get you that asap.

Lisa and I are looking forward to discussing the PRA with you later today.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 28, 2021 3:05 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

Thanks for the call today. I am available next week for a call with you and Ms. Aozasa to further discuss the parameters of the records request.

As discussed, I am attaching an e-mail between Lisa Aozasa and John Riddell of Cal Fire regarding the illegal fence on TEG's Miramar property that we obtained from a different records request. We'd request that the county take a second look for e-mails regarding the fence violation during this time period.

We also request a case activity report for the tree permit if one exists.

We are waiting next on records regarding PLN2018-00426, then PRE2018-00003. Would it be possible to obtain a copy of the case activity reports for these applications pending a more complete production?

Thank you,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, May 28, 2021 1:38 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Yes; I can try you around 2:30, if that works for you.

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 28, 2021 11:10 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

Are you available to speak today about the status of production? You can call me at 415-312-6345.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Thursday, May 20, 2021 10:34 AM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>; Raj Deol <rdeol@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good morning, Nicole,

We have another set of responsive, non-exempt records available for your review. The files are quite large, so we have made them available at this link: https://smcgov-my.sharepoint.com/:f/g/personal/rdeol_smcgov_org/ElgOjFkOs7pEvkNLjDRV5hIBM1Ffunr6zqXlkvNQVOboA?e=9ff9Hr. You will need to enter your email address. Let me know if you have any problems accessing the files.

We continue to locate and review records in response to your request. I will provide an additional update next week.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 3:31 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

Thank you. Based on other CPRA requests we know the county's production is still missing some e-mails between the county and the owners of the TEG Property regarding the fence violation as well as between the county and CalFire regarding the fence violation. Please confirm the next set of responsive records will include additional documents regarding the fence violation. There may be additional responsive e-mails regarding the fence violation that have not been produced so far by any public entity.

Harassment would constitute intimidation through shouting, falsely accusing county officials of behavior such as stealing, physically obstructing county official's from performing their duties on or near the TEG Property, or physically obstructing access to any easement across the TEG Property. We are also interested in any complaints submitted by the neighbors about the number and proximity of cameras installed by the owners of the TEG Property which invades the privacy of the neighbors by allowing them to surveil the neighbors, most of whom have children.

With respect to 18 Terrace Avenue, we are most interested in any notices of violation issued to the owner or neighbor complaints and all related notes and records about the owner's response and the county's handling of the violation or complaint. We are informed and believe the owners may have engaged in illegal grading at the property and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, May 14, 2021 2:52 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Unfortunately, I'm still reviewing the next set of potentially responsive records, and I don't expect I'll be able to produce documents to you until next week.

I did have a question regarding the TEG Property request. You asked for "[c]ommunications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)." The PRA requires us to allow inspection of a record in response to a request that reasonably describes an identifiable record. This particular request does not reasonably describe an identifiable record, given the ambiguity regarding what might constitute "harassment." Please let me know if there are any more specifics that would help us identify the record you are seeking.

And last, would it be possible for you to provide a similar focused list of items you are seeking for the 18 Terrace Avenue PRA? I think we are close to concluding our search on the TEG Property, and expect staff will be able to start searching for records on the 18 Terrace Avenue PRA next week.

Thank you,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, May 14, 2021 9:27 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

May we have an update on the production?

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Nicole Campbell
Sent: Wednesday, May 5, 2021 11:34 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

I received the 10 files. Thank you.

I look forward to receiving your update next week.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Tuesday, May 4, 2021 5:16 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

My attempt to email you the 10 files referred to below appears to have been unsuccessful. They are now posted at the following one drive site: https://smcgov-my.sharepoint.com/:f/g/personal/lshearer_smcgov_org/Eg8P0HeLwtVPmzr0TAhEwpMBNuFEV0hVJH58U8Oqdqm5Ww?e=bloepX, which you should be able to access with your email address. (Thank you, Annabelle!)

Please see my email below for further details.

Melissa

From: Melissa Andrikopoulos
Sent: Tuesday, May 4, 2021 4:44 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

I have attached 10 additional files containing records responsive to your request for records related to VIO2017-00054. Please note that I have determined that certain portions of records are not subject to disclosure under the PRA, because the records constitute records, the disclosure of which is exempted pursuant to federal or state law, including, but not limited to provisions of the Evidence Code relating to privilege (Cal. Gov. Code § 6254(k)). I have redacted the exempt records accordingly.

We will continue to search for, review, and produce records responsive to your requests. I will provide you with a further update no later than next week.

Feel free to contact me with questions.

Thanks,
Melissa

From: Melissa Andrikopoulos
Sent: Friday, April 30, 2021 4:49 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Please find attached additional records that are responsive to your PRA request, for the file PLN 2018-00426.

We have also located many potentially responsive emails, but we are in the process of reviewing those emails to confirm whether they contain any information that may be exempt from production under the PRA. This is taking us some time. I expect to be able to provide you with at least a portion of those records by May 5th.

As you're likely aware, the Public Records Act does not require responses to specific questions, but rather requires us to provide access to records that may be responsive. I believe that the questions you've asked below will be answered by the records. In the interest of being helpful, however, there is not a particular code enforcement officer currently assigned to VIO2017-00054. And there are no additional records of citations issued for VIO2017-00054 beyond what I have provided. Let me know if you would like to set up a call to discuss next week.

Thanks,

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, April 26, 2021 10:05 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Thanks, Melissa.

Is there a code enforcement officer currently assigned to VIO2017-00054?

From the case report, it appears that citations were going to follow a denial of the application to legalize the fence. The application to legalize the fence was denied and the property owners have not removed it. Are there any records of citations be issued?

I appreciate your assistance with the public records request.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, April 23, 2021 3:47 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Good afternoon, Nicole,

Attached is an initial production in response to your request. I expect to provide additional records mid-week next week, as well as a further estimate for continued production.

I hope you have a nice weekend.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>

Sent: Friday, April 23, 2021 10:06 AM

To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Hi Melissa,

I hope you have been well. I am writing to check in with you. We are expecting an initial production from your office today.

Best,

Nicole Campbell
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(510) 588-5178
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>

Sent: Monday, April 12, 2021 6:07 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>

Cc: Annabelle Gaiser <agaiser@smcgov.org>

Subject: RE: PRA request re 18 Terrace Ave and TEG Property

Hi Nicole,

Thank you for this email clarifying your PRA request, and for your voice messages. I apologize for my delay in responding. Thank you for focusing and prioritizing your request. It should help the Department identify the responsive records much more quickly. Please accept this email as our determination that the County does possess records responsive to your request. To the extent those records are not exempt from disclosure pursuant to the Public Records Act, we will produce them to you on a rolling basis. I anticipate that we should be able to provide at least an initial set of responsive documents by Friday, April 23rd.

We will focus our search on the seven categories listed for the "TEG Property" first. Do you have a similar list of dates and topics for 18 Terrace Avenue? If so, that would be helpful when we get to that point.

Thank you,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, April 7, 2021 11:23 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Subject: RE: PRA request re 18 Terrace Ave and TEG Property

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Melissa,

I left you a message this morning. Thank you for assisting us to locate records regarding the "TEG Property" and 18 Terrace Avenue. We are happy to accept a rolling production of records. Our priority is to receive documents regarding the "TEG Property" first. Of these, of the highest interest are documents and communications related to the following:

Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)
Tree removal permit application (PLN2021-00090) (2021 to present).
Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present.)
Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present).
Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)
County's handling of any other notices of violation regarding the TEG Property. (2012 to present).
Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

Feel free to call me with questions.

Best,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
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-Notary Public-

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strictly prohibited. If you have received this e-mail in error, please immediately notify us by replying to the sender or calling the sender at (510) 588-5178 and please destroy the original email and its attachments without reading or saving it. Thank you.

From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, March 26, 2021 2:37 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Subject: PRA request re 18 Terrace Ave and TEG Property

Good afternoon Ms. Campbell,

Your Public Records Act requests regarding 18 Terrace Avenue and the “TEG Property” have been forwarded to me for a response. I have determined that the County does possess records responsive to both requests. However, the requests are extensive, and locating and reviewing records will take the Planning Department a significant amount of time. As you are likely aware, the Public Records Act imposes a duty to produce records in response to a request that “reasonably describes an identifiable record or records.” Cal. Gov’t Code § 6253(b). To that end, and in the interest of providing you the records you need as quickly as possible, are you able to focus your requests, either by time period or otherwise? Let me know if a discussion with myself or Planning staff might help you focus your requests.

Best,

Melissa

Melissa Duncan Andrikopoulos
Deputy County Counsel
San Mateo County Counsel's Office
400 County Center, Sixth Floor
Redwood City, California 94063
650.363.4753
mandrikopoulos@smcgov.org

Diana Higuera

From: Melissa Andrikopoulos
Sent: Monday, June 14, 2021 1:40 PM
To: Nicole Campbell
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Public Records Request
Attachments: PLN2021-00090 - Case Activity.pdf

Hi Nicole,

Thank you – it was a great break. I'm attaching the case activity report for the tree permit application to this email. Staff is also searching for any emails from TEG related to this permit application, as you requested. I expect to be able to review and provide responsive, non-exempt emails this week.

Best,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Monday, June 14, 2021 11:42 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>
Subject: Public Records Request

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Melissa,

I hope you had a nice holiday last week. Are you able to send over the Case Activity Report for TEG's tree permit application as discussed on June 3?

Thanks,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com
-Notary Public-

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Diana Higuera

From: Melissa Andrikopoulos
Sent: Friday, June 18, 2021 1:48 PM
To: Nicole Campbell
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Records request re TEG Property
Attachments: Re_PLN2021-00090 - Tree Removal Permit for 9 trees on APN_ 048076120.pdf

Hi Nicole,

Please find attached records responsive to your request for emails from TEG to the County regarding the tree permit.

I hope to have an update for you early next week regarding whether there are any additional records responsive to your request for emails regarding the fence violation/tree permit, as well as any records of communication in the last two weeks regarding the fence violation.

I hope you have a nice weekend.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Thursday, June 17, 2021 4:20 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>
Subject: Records request re TEG Property

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Hi Melissa,

Hope you are well. Has there been any progress with the e-mail production for the fence violation/tree permit?

Also, we would like to know if the County informed TEG of its decision to deny reconsideration of the fence violation in the last two weeks, and may we please receive a copy of this communication?

Thank you,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
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From: [Tejinder singh](#)
To: [Ruemel Panglao](#)
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120
Date: Thursday, May 6, 2021 2:57:43 PM

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Ruemel,

It has been a long time, I am hoping you may have an update.

Thanks
TJ Singh

On April 29, 2021 at 3:09 PM, Tejinder singh <tjsingh007@me.com> wrote:

Thanks Ruemel,

I greatly appreciate your help.

Thanks
TJ Singh

On April 29, 2021 at 2:52 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Hello TJ,

I have forwarded the correspondence to our admin staff handling the PRA. The correspondence will not come from me directly.

Thanks,
Ruemel

From: Tejinder singh <tjsingh007@me.com>
Sent: Thursday, April 29, 2021 8:43 AM
To: Ruemel Panglao <rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

Thanks
TJ Singh

On April 27, 2021 at 1:54 PM, Tejinder singh <tjsingh007@me.com> wrote:

Hi Ruemel,

When you have a moment, can you please email me any update.

Thanks
TJ Singh

On April 22, 2021 at 3:29 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Good afternoon TJ,

It was determined today that your request requires a PRA and is now being processed as such.

Thanks,
Ruemel

From: tj singh <tjsingh007@me.com>
Sent: Wednesday, April 21, 2021 9:46 AM
To: Ruemel Panglao <rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Thank you Ruemel,

When you have a moment, would you please have an update regarding my email below.

Thanks
TJ Singh

On Apr 19, 2021, at 5:26 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Hi TJ,

I am currently scoping with our admin staff whether such a request requires a PRA.

Thanks,
Ruemel

From: Tejinder singh <tjsingh007@me.com>
Sent: Monday, April 19, 2021 2:05 PM
To: Ruemel Panglao <rpanglao@smcgov.org>

Subject: Re: PLN2021-00090 - Tree Removal Permit
for 9 trees on APN: 048076120

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Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

In case you may need it, I am attaching the request under CPRA (California Public records Act).

Thanks
TJ Singh

On April 16, 2021 at 1:07 PM, tj singh
<tjsingh007@me.com> wrote:

Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

In case you may need it, I am attaching the request under CPRA (California Public records Act).

Thanks
TJ Singh

Begin forwarded message:

From: Tejinder singh
<tjsingh007@me.com>
Date: April 12, 2021 at
7:19:21 PM EDT
To: Ruemel Panglao
<rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

Thanks Ruemel,

When you get a chance,

can you please email me
the objections from the
property owner of APN
048-076-140.

In case you may need it,
I am attaching the
request under CPRA
(California Public records
Act).

Thanks
TJ Singh

On April 12, 2021 at 3:03
PM, Ruemel Panglao
<rpanglao@smcgov.org>
wrote:

Hello TJ,

Per my
consultation
with senior
staff, to
continue
processing,
we will
need either
1) a survey
to verify
that the
trees are
on your
property
OR 2) a
signed
letter of
concurrence
from the
property
owner of
APN
048076140
in which
they agree
with the
removal of
the subject
trees.

Thanks,
Ruemel

From:

Tejinder
singh
<tjsingh007@me.com>

Sent:

Friday,
April 9,
2021 2:05
AM

To: Ruemel

Panglao
<rpanglao@smcgov.org>

Subject:

Re:
PLN2021-
00090 -
Tree
Removal
Permit for
9 trees on
APN:
048076120

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originated
from outside
of San
Mateo
County.
Unless you
recognize
the sender's
email
address and
know the
content is
safe, do not
click links,
open
attachments
or reply.**

Hi Ruemel,

I trust all is
well at your
end.

When you
get a
chance,
would you
please let

me know
when we
may
receive the
permit.

Thanks
Best
Regards
TJ Singh
650-274-
4653

On March
18, 2021 at
11:15 AM,
Tejinder
singh
<tjsingh007@icloud.com>
wrote:

Thanks Ruemel,

I
am
sending
you
the
photos
in
the
links
below.

The
Zoomed
out
photo
showing
the
yellow
caution
tapes
on
the
trees
and
the
notice.
[https://www.dropbox.com/s/cdgz7rrbtxhhv1x/2021-03-18%2010.51.27.jpg?
dl=0](https://www.dropbox.com/s/cdgz7rrbtxhhv1x/2021-03-18%2010.51.27.jpg?dl=0)

Close

up

of

the

Notice.

[https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[03-](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[17%2018.56.38.jpg?](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[dl=0](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

Thanks

Best

regards

TJ

Singh

650-

274-

4653

On

March

17,

2021

at

11:36

AM,

Ruemel

Panglao

<rpanglao@smc.gov.org>

wrote:

Hello

TJ,

Please

post

the

attached

posting

notice

in

plain

sight

along

the

right

of

way.

Also,

please

tie

or

tag
the
trees
proposed
for
removal
with
something
bright
such
as
yellow
caution
tape.
The
attached
notice
must
be
up
tomorrow,
March
18
and
should
remain
posted
on
site
through
the
end
of
the
day
Monday,
March
29.
If
you
cannot
do
this
as
soon
as
tomorrow,
please
let
me
know
what
day

you
can
post
the
notice
and
I
will
send
you
an
updated
version.

After
posting
the
notice
and
marking
the
trees,
please
take
photographs
and
send
them
to
me.
Ensure
that
the
photos
are
a
bit
zoomed
out
to
provide
context
of
the
surroundings.

Thanks,
Ruemel

From:
Tejinder
singh

<tjsingh007@icloud.com>

Sent:

Friday,
March
12,
2021
2:26
PM

To:

PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>

Cc:

Ruemel
Panglao
<rpanglao@smcgov.org>

Subject:

Re:
PLN2021-
00090
-
Tree
Removal
Permit
for
9
trees
on
APN:
048076120

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email
originated
from
outside
of
San
Mateo
County.
Unless
you
recognize
the
sender's
email
address
and
know
the
content
is
safe,
do
not
[redacted]

**click
links,
open
attachments
or
reply.**

Ok
Thanks
Angela

On
March
12,
2021
at
1:17
PM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Mr.
Singh,

The
correct
parcel
number
is
attached
to
the
file.
However,
as
this
is
an
undeveloped
parcel
that
is
not
merged
with
048-
076-
130
(655

Miramar
Drive)
the
parcel
is
unaddressed.

Best,
Angela
Chavez

San
Mateo
County
Planning
&
Building
Department
455
County
Center,
2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and**

staff
has
been
directed
to
work
remotely
until
further
notice.
Please
refer
to
our
website
for
temporary
closure
information/updates,
<https://planning.smcgov.org>.

From:

Tejinder
singh
<tjsingh007@icloud.com>

Sent:

Friday,
March
12,
2021
1:08
PM

To:

PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>

Subject:

Re:
PLN2021-
00090
-
Tree
Removal
Permit
for
9
trees
on

APN:
048076120

CAUTION:

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⌈
Thanks
Angela,

I
will
appreciate
your
assistance
with
correcting the
project
address
and
APN.

As
stated
in
the
Application,

the
correct
project
address
is
655
Miramar
Drive,
Parcel-
1,
Half
Moon
Bay,
CA
94019

The
correct
APN
is
048-
076-
120

Please
feel
free
to email
me
the
corrected
invoice.

Thanks
TJ
Singh

On
March
12,
2021
at
12:54
PM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Mr.
Singh,

You
can

mail
the
check
to
Ruemel's
attention
(to
the
address
in
our
signature
block)
but
please
note
the
permit
number
in
the
memo
field
to
make
sure
it
is
credited
to
the
correct
permit.

Best,
Angela
Chavez

San
Mateo
County
Planning
&
Building
Department
455
County
Center,

2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and
staff
has
been
directed
to
work
remotely
until
further
notice.
Please
refer
to
our
website
for
temporary
closure
information/updates,
<https://planning.smcgov.org>.**

From:

Tejinder

singh

<tjsingh007@icloud.com>

Sent:

Friday,

March

12,

2021

12:42

PM

To:

PLANNING_PlanningProjects

<PlanningProjects@smcgov.org>

Cc:

Ruemel

Panglao

<rpanglao@smcgov.org>

Subject:

Re:

PLN2021-

00090

-

Tree

Removal

Permit

for

9

trees

on

APN:

048076120

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the

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address

and

know
the
content
is
safe,
do
not
click
links,
open
attachments
or
reply.

Thank
you
Bryan,

I
am
attaching
the
Deed
for
the
property.

Would
it
be
ok
for
me
to
mail
the
check
drawn
in
the
favor
of
San
Mateo
County
and
mailed
to
Ruemel's
attention
or
would
it

be
better
to
stop
by
and
drop
off
the
check.

Thanks
TJ
Singh
650-
274-
4653

On
March
12,
2021
at
11:44
AM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Hello
Mr.
Singh,

Your
application
for
removal
of
(9)
trees
on
your
property
has
been
opened
with
case
number
above.
The

project
planner
assigned
to
process
the
permit
is
Mr.
Ruemel
Panglao
(cc'd
above).
Additionally
can
you
provide
a
tax
bill/or
deed
for
the
subject
parcel?
Attached
are
the
fees
required
prior
to
permit
issuance.
A
3%
Credit
Card
surcharge
will
be
included
if
choosing
not
to
pay
by

check.

Thank
you,

Bryan
Albini
Planner
II

San
Mateo
County
Planning
&
Building
Department
455
County
Center,
2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and**

staff
has
been
directed
to
work
remotely
until
further
notice.
Please
refer
to
our
website
for
temporary
closure
information/updates,
<https://planning.smcgov.org>.

Diana Higuera

From: Melissa Andrikopoulos
Sent: Tuesday, June 29, 2021 10:13 PM
To: Nicole Campbell
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Records request re TEG Property

Hi Nicole,

We have identified additional records responsive to your request. Given the size of the files, I have placed them in a shared folder available at: https://smcgov-my.sharepoint.com/:f/g/personal/mandrikopoulos_smcgov_org/EnKruilDlAtBp-XpRdT_fBoBUzNy6S0R3qpRRLIjEHSeMw?e=iuxTeg. Please let me know if you have any problems accessing the files.

Please note that I have redacted portions of the responsive records consistent with the Public Records Act. Specifically, I have redacted attorney-client privileged communications, and personal contact information, where the public interest served by withholding such information outweighs the public interest in disclosure.

There are no records responsive to your request regarding communication with Mr. Singh in the last two weeks regarding the fence violation. My understanding is that a renewed discussion regarding the need for a CDP to legalize the fence has not occurred yet, but I expect it will in the near future.

Please contact me with any questions.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, June 25, 2021 10:55 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

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Hi Melissa,

I am following up on our e-mail exchange below. Do you have an update regarding additional records with respect to the fence violation/tree permit, including records of communication in the last two weeks regarding the fence violation?

Thanks,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, June 18, 2021 1:48 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

Hi Nicole,

Please find attached records responsive to your request for emails from TEG to the County regarding the tree permit.

I hope to have an update for you early next week regarding whether there are any additional records responsive to your request for emails regarding the fence violation/tree permit, as well as any records of communication in the last two weeks regarding the fence violation.

I hope you have a nice weekend.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Thursday, June 17, 2021 4:20 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>
Subject: Records request re TEG Property

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Hi Melissa,

Hope you are well. Has there been any progress with the e-mail production for the fence violation/tree permit?

Also, we would like to know if the County informed TEG of its decision to deny reconsideration of the fence violation in the last two weeks, and may we please receive a copy of this communication?

Thank you,

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com

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Diana Higuera

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, July 21, 2021 6:01 PM
To: Melissa Andrikopoulos
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Records request re TEG Property

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Melissa,

Thank you for the summary. My clarifications follow:

2. Tree removal permit application (PLN2021-00090) (2021 to present)
 - a. We did receive some e-mails on June 29, 2021 regarding TEG's removal of trees on the median that's located within the drive that borders their lot. We have not yet received the requested e-mails between TEG and the County regarding the above tree removal permit application. Ruemel Panglao looks to be the main staff member handling the application.
3. Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present)
 - a. Please provide the paper file.
4. Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present)
 - a. Upon further review, we would like any communications/documents exchanged between July 30, 2007 and August 9, 2007 that related to legal descriptions for the property, including the driveway easement. The case activity report indicates relevant activity on/between these dates.
8. Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)
 - a. Yes, we will need the paper file. The most helpful documents would be those related to the access road, proposed driveways, or easements, and the comments from Coastside Fire dated on or about November 18, 2010 regarding the fire access turnaround.

PRA Request regarding 18 Terrace Avenue

You provided an accurate summary. We are informed and believe the owners may have engaged in illegal grading at the property (see VIO2017-00350) and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Thank you.

Nicole Campbell
Katzoff & Riggs LLP
1500 Park Avenue, Suite 300
Emeryville, CA 94608
(510) 588-5178
www.katzoffriggs.com

-Notary Public-

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Wednesday, July 14, 2021 11:59 AM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

Hi Nicole,

Please find attached to this email two records related to the CDP for the fence, per your request below.

As of my email on June 29th, we had completed our search and provided all emails related to the tree permit application (PLN2021-00090).

Below is a summary of our response to your request for records on the TEG property:

1. Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)
 - a. Response complete as of June 29th. Updated with two additional recently created records provided today (July 14).
2. Tree removal permit application (PLN2021-00090) (2021 to present)
 - a. Response complete as of June 29th.
3. Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present)
 - a. Case activity report provided on June 2, 2021. There may be a paper file – please confirm if you need us to search for/scan such a file or if the case activity report is sufficient.
4. Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present)
 - a. Case activity report provided on June 2, 2021. There may be a paper file, but I believe you indicated during our call that you do not require additional records on this item. Please confirm.
5. Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder “TJ” Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)
 - a. Responsive records may have been provided as related to the other requests; no additional responsive records were identified.
6. We are also interested in any complaints submitted by the neighbors about the number and proximity of cameras installed by the owners of the TEG Property which invades the privacy of the neighbors by allowing them to surveil the neighbors, most of whom have children.
 - a. Responsive records may have been provided as related to the other requests; no additional responsive records were identified.
7. County’s handling of any other notices of violation regarding the TEG Property. (2012 to present)
 - a. No responsive records.
8. Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)
 - a. Case activity report provided on June 2, 2021. There may be a paper file – please confirm if you need us to search for/scan such a file or if the case activity report is sufficient.

With respect to your PRA request for records related to 18 Terrace Avenue, I believe you were requesting:

1. Any notices of violation issued to the owner.
2. Neighbor complaints.
3. All related notes and records about the owner's response and the county's handling of the violation or complaint. We are informed and believe the owners may have engaged in illegal grading at the property and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Could you please confirm the scope of your request for 18 Terrace, and provide any additional detail available – i.e., date range, nature of complaint, etc. – that might help us target our search?

Thank you for your collaboration on this matter.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, July 14, 2021 10:23 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

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Hi Melissa,

Thank you for the additional e-mails. We noticed on the permit portal site that planning staff again denied a exemption for the fence and indicated the need for a CDP on July 8, 2021. If there are additional e-mail communications regarding the denial we would like a copy as part of our request.

Is there a status update with respect to the e-mail communications regarding the tree permit application (PLN2021-00090)?

Thank you for your continuing efforts with respect to the Public Records Act request.

Best,

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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Tuesday, June 29, 2021 10:13 PM

To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

Hi Nicole,

We have identified additional records responsive to your request. Given the size of the files, I have placed them in a shared folder available at: https://smcgov-my.sharepoint.com/:f/g/personal/mandrikopoulos_smcgov_org/EnKruiLdIAtBp-XpRdT_fBoBUzNy6S0R3qpRRLIjEHSeMw?e=iuxTeg. Please let me know if you have any problems accessing the files.

Please note that I have redacted portions of the responsive records consistent with the Public Records Act. Specifically, I have redacted attorney-client privileged communications, and personal contact information, where the public interest served by withholding such information outweighs the public interest in disclosure.

There are no records responsive to your request regarding communication with Mr. Singh in the last two weeks regarding the fence violation. My understanding is that a renewed discussion regarding the need for a CDP to legalize the fence has not occurred yet, but I expect it will in the near future.

Please contact me with any questions.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Friday, June 25, 2021 10:55 AM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

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Hi Melissa,

I am following up on our e-mail exchange below. Do you have an update regarding additional records with respect to the fence violation/tree permit, including records of communication in the last two weeks regarding the fence violation?

Thanks,

Nicole Campbell
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From: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Sent: Friday, June 18, 2021 1:48 PM
To: Nicole Campbell <ncampbell@katzoffriggs.com>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

Hi Nicole,

Please find attached records responsive to your request for emails from TEG to the County regarding the tree permit.

I hope to have an update for you early next week regarding whether there are any additional records responsive to your request for emails regarding the fence violation/tree permit, as well as any records of communication in the last two weeks regarding the fence violation.

I hope you have a nice weekend.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Thursday, June 17, 2021 4:20 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>
Subject: Records request re TEG Property

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Hi Melissa,

Hope you are well. Has there been any progress with the e-mail production for the fence violation/tree permit?

Also, we would like to know if the County informed TEG of its decision to deny reconsideration of the fence violation in the last two weeks, and may we please receive a copy of this communication?

Thank you,

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Diana Higuera

From: Melissa Andrikopoulos
Sent: Thursday, July 22, 2021 12:42 PM
To: Nicole Campbell
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Records request re TEG Property
Attachments: RE: Records request re TEG Property

Hi Nicole,

We will work on items 3, 4, and 8, and the request for 18 Terrace Avenue. Regarding item 2, I believe we provided the emails between TEG and the County regarding PLN2021-00090 on June 18, 2021. I'm reattaching here. Please let me know if you think we've missed something in that regard.

Best,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
Sent: Wednesday, July 21, 2021 6:01 PM
To: Melissa Andrikopoulos <mandrikopoulos@smcgov.org>
Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

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Hi Melissa,

Thank you for the summary. My clarifications follow:

2. Tree removal permit application (PLN2021-00090) (2021 to present)
 - a. We did receive some e-mails on June 29, 2021 regarding TEG's removal of trees on the median that's located within the drive that borders their lot. We have not yet received the requested e-mails between TEG and the County regarding the above tree removal permit application. Ruemel Panglao looks to be the main staff member handling the application.
3. Pre-Application for single family residence and garage (PRE2018-00053) (Sep. 2018 to present)
 - a. Please provide the paper file.
4. Easements across TEG Property. Especially as a result of the 2007 lot line adjustment affecting the property. (PLN2007-00153) (2007 to present)
 - a. Upon further review, we would like any communications/documents exchanged between July 30, 2007 and August 9, 2007 that related to legal descriptions for the property, including the driveway easement. The case activity report indicates relevant activity on/between these dates.
8. Application to subdivide the TEG Property. (PLN2009-00069). (2009 to present.)

a. Yes, we will need the paper file. The most helpful documents would be those related to the access road, proposed driveways, or easements, and the comments from Coastside Fire dated on or about November 18, 2010 regarding the fire access turnaround.

PRA Request regarding 18 Terrace Avenue

You provided an accurate summary. We are informed and believe the owners may have engaged in illegal grading at the property (see VIO2017-00350) and/or the planting of trees that encroached on 22 Terrace Ave. and had to be removed with the assistance of the county sheriff.

Thank you.

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Hi Nicole,

Please find attached to this email two records related to the CDP for the fence, per your request below.

As of my email on June 29th, we had completed our search and provided all emails related to the tree permit application (PLN2021-00090).

Below is a summary of our response to your request for records on the TEG property:

1. Violation notice regarding illegal fence (VIO2017-0054), denial of subsequent application regarding fence (PLN2018-00426), and any continuing county action regarding still existing illegal fence. (2017 to present)
 - a. Response complete as of June 29th. Updated with two additional recently created records provided today (July 14).
2. Tree removal permit application (PLN2021-00090) (2021 to present)
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 - a. Case activity report provided on June 2, 2021. There may be a paper file, but I believe you indicated during our call that you do not require additional records on this item. Please confirm.
5. Communications regarding harassment of county officials or others by the owners of the TEG Property, Tejinder "TJ" Singh and Tripatinder Chowdhry. E.g., Joe Guistino of Coastside Water District in 2017. (2012 to present.)
 - a. Responsive records may have been provided as related to the other requests; no additional responsive records were identified.
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With respect to your PRA request for records related to 18 Terrace Avenue, I believe you were requesting:

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Could you please confirm the scope of your request for 18 Terrace, and provide any additional detail available – i.e., date range, nature of complaint, etc. – that might help us target our search?

Thank you for your collaboration on this matter.

Melissa

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Hi Melissa,

Thank you for the additional e-mails. We noticed on the permit portal site that planning staff again denied a exemption for the fence and indicated the need for a CDP on July 8, 2021. If there are additional e-mail communications regarding the denial we would like a copy as part of our request.

Is there a status update with respect to the e-mail communications regarding the tree permit application (PLN2021-00090)?

Thank you for your continuing efforts with respect to the Public Records Act request.

Best,

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There are no records responsive to your request regarding communication with Mr. Singh in the last two weeks regarding the fence violation. My understanding is that a renewed discussion regarding the need for a CDP to legalize the fence has not occurred yet, but I expect it will in the near future.

Please contact me with any questions.

Thanks,
Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
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Hi Melissa,

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Cc: Lisa Aozasa <laozasa@smcgov.org>; Annabelle Gaiser <agaiser@smcgov.org>
Subject: RE: Records request re TEG Property

Hi Nicole,

Please find attached records responsive to your request for emails from TEG to the County regarding the tree permit.

I hope to have an update for you early next week regarding whether there are any additional records responsive to your request for emails regarding the fence violation/tree permit, as well as any records of communication in the last two weeks regarding the fence violation.

I hope you have a nice weekend.

Melissa

From: Nicole Campbell <ncampbell@katzoffriggs.com>
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Hi Melissa,

Hope you are well. Has there been any progress with the e-mail production for the fence violation/tree permit?

Also, we would like to know if the County informed TEG of its decision to deny reconsideration of the fence violation in the last two weeks, and may we please receive a copy of this communication?

Thank you,

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Diana Higuera

From: Melissa Andrikopoulos
Sent: Friday, June 18, 2021 1:48 PM
To: Nicole Campbell
Cc: Lisa Aozasa; Annabelle Gaiser
Subject: RE: Records request re TEG Property
Attachments: Re_PLN2021-00090 - Tree Removal Permit for 9 trees on APN_ 048076120.pdf

Hi Nicole,

Please find attached records responsive to your request for emails from TEG to the County regarding the tree permit.

I hope to have an update for you early next week regarding whether there are any additional records responsive to your request for emails regarding the fence violation/tree permit, as well as any records of communication in the last two weeks regarding the fence violation.

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Melissa

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From: [Tejinder singh](#)
To: [Ruemel Panglao](#)
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120
Date: Thursday, May 6, 2021 2:57:43 PM

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Hi Ruemel,

It has been a long time, I am hoping you may have an update.

Thanks
TJ Singh

On April 29, 2021 at 3:09 PM, Tejinder singh <tjsingh007@me.com> wrote:

Thanks Ruemel,

I greatly appreciate your help.

Thanks
TJ Singh

On April 29, 2021 at 2:52 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Hello TJ,

I have forwarded the correspondence to our admin staff handling the PRA. The correspondence will not come from me directly.

Thanks,
Ruemel

From: Tejinder singh <tjsingh007@me.com>
Sent: Thursday, April 29, 2021 8:43 AM
To: Ruemel Panglao <rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

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Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

Thanks
TJ Singh

On April 27, 2021 at 1:54 PM, Tejinder singh <tjsingh007@me.com> wrote:

Hi Ruemel,

When you have a moment, can you please email me any update.

Thanks
TJ Singh

On April 22, 2021 at 3:29 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Good afternoon TJ,

It was determined today that your request requires a PRA and is now being processed as such.

Thanks,
Ruemel

From: tj singh <tjsingh007@me.com>
Sent: Wednesday, April 21, 2021 9:46 AM
To: Ruemel Panglao <rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

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Thank you Ruemel,

When you have a moment, would you please have an update regarding my email below.

Thanks
TJ Singh

On Apr 19, 2021, at 5:26 PM, Ruemel Panglao <rpanglao@smcgov.org> wrote:

Hi TJ,

I am currently scoping with our admin staff whether such a request requires a PRA.

Thanks,
Ruemel

From: Tejinder singh <tjsingh007@me.com>
Sent: Monday, April 19, 2021 2:05 PM
To: Ruemel Panglao <rpanglao@smcgov.org>

Subject: Re: PLN2021-00090 - Tree Removal Permit
for 9 trees on APN: 048076120

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Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

In case you may need it, I am attaching the request under CPRA (California Public records Act).

Thanks
TJ Singh

On April 16, 2021 at 1:07 PM, tj singh
<tjsingh007@me.com> wrote:

Hi Ruemel,

When you get a chance, can you please email me the objections from the property owner of APN 048-076-140.

In case you may need it, I am attaching the request under CPRA (California Public records Act).

Thanks
TJ Singh

Begin forwarded message:

From: Tejinder singh
<tjsingh007@me.com>
Date: April 12, 2021 at
7:19:21 PM EDT
To: Ruemel Panglao
<rpanglao@smcgov.org>
Subject: Re: PLN2021-00090 - Tree Removal Permit for 9 trees on APN: 048076120

Thanks Ruemel,

When you get a chance,

can you please email me
the objections from the
property owner of APN
048-076-140.

In case you may need it,
I am attaching the
request under CPRA
(California Public records
Act).

Thanks
TJ Singh

On April 12, 2021 at 3:03
PM, Ruemel Panglao
<rpanglao@smcgov.org>
wrote:

Hello TJ,

Per my
consultation
with senior
staff, to
continue
processing,
we will
need either
1) a survey
to verify
that the
trees are
on your
property
OR 2) a
signed
letter of
concurrence
from the
property
owner of
APN
048076140
in which
they agree
with the
removal of
the subject
trees.

Thanks,
Ruemel

From:

Tejinder
singh
<tjsingh007@me.com>

Sent:

Friday,
April 9,
2021 2:05
AM

To: Ruemel

Panglao
<rpanglao@smcgov.org>

Subject:

Re:
PLN2021-
00090 -
Tree
Removal
Permit for
9 trees on
APN:
048076120

CAUTION:

**This email
originated
from outside
of San
Mateo
County.
Unless you
recognize
the sender's
email
address and
know the
content is
safe, do not
click links,
open
attachments
or reply.**

Hi Ruemel,

I trust all is
well at your
end.

When you
get a
chance,
would you
please let

me know
when we
may
receive the
permit.

Thanks
Best
Regards
TJ Singh
650-274-
4653

On March
18, 2021 at
11:15 AM,
Tejinder
singh
<tjsingh007@icloud.com>
wrote:

Thanks Ruemel,

I
am
sending
you
the
photos
in
the
links
below.

The
Zoomed
out
photo
showing
the
yellow
caution
tapes
on
the
trees
and
the
notice.
[https://www.dropbox.com/s/cdgz7rrbtxhhv1x/2021-03-18%2010.51.27.jpg?
dl=0](https://www.dropbox.com/s/cdgz7rrbtxhhv1x/2021-03-18%2010.51.27.jpg?dl=0)

Close

up

of

the

Notice.

[https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[03-](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[17%2018.56.38.jpg?](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

[dl=0](https://www.dropbox.com/s/vtqyxsi4yhhpnt1/2021-03-17%2018.56.38.jpg?dl=0)

Thanks

Best

regards

TJ

Singh

650-

274-

4653

On

March

17,

2021

at

11:36

AM,

Ruemel

Panglao

<rpanglao@smc.gov.org>

wrote:

Hello

TJ,

Please

post

the

attached

posting

notice

in

plain

sight

along

the

right

of

way.

Also,

please

tie

or

tag
the
trees
proposed
for
removal
with
something
bright
such
as
yellow
caution
tape.
The
attached
notice
must
be
up
tomorrow,
March
18
and
should
remain
posted
on
site
through
the
end
of
the
day
Monday,
March
29.
If
you
cannot
do
this
as
soon
as
tomorrow,
please
let
me
know
what
day

you
can
post
the
notice
and
I
will
send
you
an
updated
version.

After
posting
the
notice
and
marking
the
trees,
please
take
photographs
and
send
them
to
me.
Ensure
that
the
photos
are
a
bit
zoomed
out
to
provide
context
of
the
surroundings.

Thanks,
Ruemel

From:
Tejinder
singh

<tjsingh007@icloud.com>

Sent:

Friday,
March
12,
2021
2:26
PM

To:

PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>

Cc:

Ruemel
Panglao
<rpanglao@smcgov.org>

Subject:

Re:
PLN2021-
00090
-
Tree
Removal
Permit
for
9
trees
on
APN:
048076120

CAUTION:

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of
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Mateo
County.
Unless
you
recognize
the
sender's
email
address
and
know
the
content
is
safe,
do
not
[redacted]

**click
links,
open
attachments
or
reply.**

Ok
Thanks
Angela

On
March
12,
2021
at
1:17
PM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Mr.
Singh,

The
correct
parcel
number
is
attached
to
the
file.
However,
as
this
is
an
undeveloped
parcel
that
is
not
merged
with
048-
076-
130
(655

Miramar
Drive)
the
parcel
is
unaddressed.

Best,
Angela
Chavez

San
Mateo
County
Planning
&
Building
Department
455
County
Center,
2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and**

staff
has
been
directed
to
work
remotely
until
further
notice.
Please
refer
to
our
website
for
temporary
closure
information/updates,
<https://planning.smcgov.org>.

From:

Tejinder
singh
<tjsingh007@icloud.com>

Sent:

Friday,
March
12,
2021
1:08
PM

To:

PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>

Subject:

Re:
PLN2021-
00090
-
Tree
Removal
Permit
for
9
trees
on

APN:
048076120

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email
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recognize
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sender's
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address
and
know
the
content
is
safe,
do
not
click
links,
open
attachments
or
reply.**

␣
Thanks
Angela,

I
will
appreciate
your
assistance
with
correcting the
project
address
and
APN.

As
stated
in
the
Application,

the
correct
project
address
is
655
Miramar
Drive,
Parcel-
1,
Half
Moon
Bay,
CA
94019

The
correct
APN
is
048-
076-
120

Please
feel
free
to email
me
the
corrected
invoice.

Thanks
TJ
Singh

On
March
12,
2021
at
12:54
PM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Mr.
Singh,

You
can

mail
the
check
to
Ruemel's
attention
(to
the
address
in
our
signature
block)
but
please
note
the
permit
number
in
the
memo
field
to
make
sure
it
is
credited
to
the
correct
permit.

Best,
Angela
Chavez

San
Mateo
County
Planning
&
Building
Department
455
County
Center,

2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and
staff
has
been
directed
to
work
remotely
until
further
notice.
Please
refer
to
our
website
for
temporary
closure
information/updates,
<https://planning.smcgov.org>.**

From:

Tejinder

singh

<tjsingh007@icloud.com>

Sent:

Friday,

March

12,

2021

12:42

PM

To:

PLANNING_PlanningProjects

<PlanningProjects@smcgov.org>

Cc:

Ruemel

Panglao

<rpanglao@smcgov.org>

Subject:

Re:

PLN2021-

00090

-

Tree

Removal

Permit

for

9

trees

on

APN:

048076120

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Mateo

County.

Unless

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the

sender's

email

address

and

know
the
content
is
safe,
do
not
click
links,
open
attachments
or
reply.

Thank
you
Bryan,

I
am
attaching
the
Deed
for
the
property.

Would
it
be
ok
for
me
to
mail
the
check
drawn
in
the
favor
of
San
Mateo
County
and
mailed
to
Ruemel's
attention
or
would
it

be
better
to
stop
by
and
drop
off
the
check.

Thanks
TJ
Singh
650-
274-
4653

On
March
12,
2021
at
11:44
AM,
PLANNING_PlanningProjects
<PlanningProjects@smcgov.org>
wrote:

Hello
Mr.
Singh,

Your
application
for
removal
of
(9)
trees
on
your
property
has
been
opened
with
case
number
above.
The

project
planner
assigned
to
process
the
permit
is
Mr.
Ruemel
Panglao
(cc'd
above).
Additionally
can
you
provide
a
tax
bill/or
deed
for
the
subject
parcel?
Attached
are
the
fees
required
prior
to
permit
issuance.
A
3%
Credit
Card
surcharge
will
be
included
if
choosing
not
to
pay
by

check.

Thank
you,

Bryan
Albini
Planner
II

San
Mateo
County
Planning
&
Building
Department
455
County
Center,
2nd
Floor
Redwood
City,
CA
94063
Email:
PlanningProjects@smcgov.org

****Due
to
County
protocol
surrounding
COVID-
19,
the
Planning
and
Building
Department's
public
assistance
counters
are
closed
and**

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has
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information/updates,
<https://planning.smcgov.org>.