

THE SUPERIOR COURT, STATE OF CALIFORNIA  
For the County of Santa Barbara  
Figueroa Division

THE PEOPLE OF THE STATE OF CALIFORNIA  
Plaintiff,

vs.

COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT,  
WATER RESOURCES DIVISION

Defendant.

DA No. 23-11-518294  
Court No. **23CR08147**  
**FELONY COMPLAINT**

**FILED**  
SUPERIOR COURT of CALIFORNIA  
COUNTY of SANTA BARBARA

**11/28/2023**

Darrel E. Parker, Executive Officer  
BY Enriquez, Esteban  
Deputy Clerk

The undersigned is informed and believes that:

COUNT 1

Between or approximately between January 22, 2021 and July 6, 2021, in the County of Santa Barbara, Defendant, COUNTY OF SANTA BARBARA DEPARTMENT OF PUBLIC WORKS, WATER RESOURCES DIVISION violated **GOVERNMENT CODE SECTION 8670.64(a)(3)**, a Felony, by knowingly engaging in or causing the discharge or spill of oil into waters of the state, or a person who reasonably should have known that the person was engaging in or causing the discharge or spill of oil into waters of the state, without authorization from the United States, California, or another agency with jurisdiction, to wit: knowingly causing the discharge of oil from the Toro Canyon Oil Water Separator System into Toro Canyon Creek.

COUNT 2

On or approximately on January 1, 2023, in the County of Santa Barbara, Defendant, COUNTY OF SANTA BARBARA DEPARTMENT OF PUBLIC WORKS, WATER RESOURCES DIVISION violated **WATER CODE SECTION 13387(b)**, a Misdemeanor, by negligently discharging a pollutant into Waters of the United States, to wit: negligently causing the discharge of oil from the Toro Canyon Oil Water Separator System's Underground Storage Tank into Toro Canyon Creek, which runs to the Pacific Ocean.

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I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 2 COUNT(S).

Executed at Santa Barbara, California, on November 28, 2023.



MORGAN S. LUCAS  
DEPUTY DISTRICT ATTORNEY

Agency: SBDA

<u>DEFENDANT NAME</u>	<u>SEX</u>	<u>RACE</u>	<u>HGT</u>	<u>WGT</u>	<u>EYES</u>	<u>HAIR</u>	<u>DRIVER'S LICENSE</u>	<u>STS</u>	<u>COURT DATE</u>
County of Santa Barbara Public Works Department, Water Resources Division									11/29/2023