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May 6, 2020

Sent via Certified Mail and Electronic Mail to rhaller@sawpa.org

Mr. Richard Haller, General Manager
Santa Ana Watershed Project Authority
11615 Sterling Avenue
Riverside, CA 92503

Re: Larry McKenney
Government Tort Claim for Money/Damages

Dear Mr. Haller:

Claimant, Larry McKenney (located at 88 Meridian Drive in Aliso Viejo, CA 92656) hereby submits his claim pursuant to California Government Code Section 910. Mr. McKenney requests that all notices to be sent to his representatives at JS Abrams Law, located at 20501 Ventura Blvd., Suite 327, Woodland Hills, CA 91364.

This claim is in connection with damages which occurred beginning in May 2018 at Mr. McKenney's place of employment at the Santa Ana Watershed Project Authority and culminating in Claimant's termination from employment on December 11, 2019 and continuing to the present.

The details upon which the damage occurred, the particular acts/omissions on the part of SAWPA which caused the damage, and the damages sustained are as follows:

In May 2018, Mr. McKenney advised the commissioners in an open session commission meeting that Mr. Sullivan's letter to other members of the commission constituted a Brown Act violation. Thereafter, Mr. Sullivan began a pattern of harassment and retaliation against Mr. McKenney, including public comments of resentment, restrictive directives, unprovoked micromanagement, and an attempt to revise and take away certain responsibilities from Mr. McKenney, among others. Mr. Sullivan recruited the help of Richard Haller in his efforts. On many occasions, Mr. McKenney raised his concerns and complaints regarding this unwarranted harassment and retaliation with SAWPA, however, they did not cease. Unfortunately, on December 11, 2019, as a final adverse employment

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action in further retaliation, Mr. McKenney was unlawfully terminated. As a result of these actions and SAWPA's inaction in addressing those complaints, Mr. McKenney has sustained injuries and damages in the form of a loss of earnings, emotional distress and other general/tort damages, and attorneys' fees to date (among other damages, including statutory penalties) at the hand of Mr. Sullivan and Mr. Haller and the inaction of SAWPA commissioners in excess of \$10,000.00. Mr. McKenney's claims for damages and injuries exceed \$25,000.00 to date, and thus, constitute an unlimited civil case.

This claim is presented and delivered in compliance with California Government Code Section 915(a) which provides, in relevant part: "A claim, any amendment thereto, [...] to a local public entity by either of the following means: (1) Delivering it to the clerk, secretary or auditor thereof. (2) Mailing it to the clerk, secretary, auditor, or to the governing body at its principal office."

Very truly yours,
JS Abrams Law, PC

Navid Kanani, Esq.

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