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SHADOW MOUNTAIN RANCH, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF RIVERSIDE

CITY OF BARSTOW, et al.,  
Plaintiffs,  
v.  
CITY OF ADELANTO, et al.,  
Defendants.

Lead Case No. CIV208568  
JCCP5265 MOJAVE BASIN WATER  
CASES

Judge: Harold W. Hopp, Department 1

**SPECIALLY-APPEARING  
PETITIONER SHADOW MOUNTAIN  
RANCH, LLC'S REPLY TO MOJAVE  
WATER AGENCY'S OPPOSITION TO  
SMR'S MOTION TO INTERPRET AND  
CLARIFY THE JUDGMENT**

*[Filed concurrently with:  
1. Supplemental Declaration of Tony  
Morgan;  
2. Objection to RJN; and  
3. Objection to Wagner Declaration.]*

Date: February 7, 2023  
Time: 8:30 a.m.  
Dept: 1

**[Reservation ID: 001680774956]**

Action Filed: May 30, 1990

1 **REPLY IN SUPPORT OF SMR’S MOTION**

2 Specially-appearing petitioner Shadow Mountain Ranch, LLC (“SMR”) submits this reply  
3 in support of its November 2, 2023 motion to interpret and clarify the Judgment.<sup>1</sup>

4 MWA deliberately mischaracterizes SMR’s Motion to this Court. SMR *only* requests that  
5 this Court clarify that the two aquifers underlying SMR’s Property are, because of their  
6 hydrogeologic disconnection, not subject to the Judgment. SMR does *not* seek in any way to  
7 “alter” the Judgment or to “carve out” any portion of “the Judgment’s adjudicated boundaries.”  
8 (MWA Opp. at pp. 1, 7.) MWA further misstates and misapplies terms such as “native water,”  
9 which term is not defined or used in the Judgment.

10 Given the limited scope of SMR’s request, SMR replies to MWA’s opposition as follows.

11 **I. SMR Does Not Seek To Amend The Judgment and Does Not Seek to Change The**  
12 **Mojave Basin Area Boundaries Adjudicated Therein.**

13 SMR does *not* seek to “alter the Judgment’s adjudicated boundaries to exclude the entire  
14 Harper Lake Basin.” (MWA Opp. at 1.)

15 As stated in SMR’s Motion and the supporting declaration of Tony Morgan (“Morgan  
16 Declaration”), the Harper Valley basin and the SMR Property are *not* the same. (SMR Mot. at  
17 pp. 9-10; Morgan Decl. at ¶ 52 [“The SMR Property and the Harper Valley basin are not,  
18 however, synonymous. For example, the SMR Property is smaller than the Harper Valley basin,  
19 and the two areas likely have different sources of groundwater inflow.”].) Nor does SMR argue  
20 that Bulletin 118’s boundaries are dispositive. Rather, and as is repeated in both the Morgan  
21 Declaration and Mr. Morgan’s supplemental declaration filed with this reply (“Morgan  
22 Supplemental Declaration”), SMR uses Harper Valley basin data and boundaries to demonstrate  
23 and describe the hydrogeologic conditions unique to SMR’s Property. (Morgan Decl. at ¶¶ 46-  
24 51; *see also* Morgan Suppl. Decl. at ¶¶ 6-7.) SMR is not using this data to argue for any change  
25 to the Judgment’s terms, boundaries, Subareas, or any other provision.

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<sup>1</sup> All defined terms have the same meaning as used in SMR’s Motion, unless otherwise defined.  
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1 **II. SMR and MWA Agree that Mojave River Water Flows Through Hinkley Gap and**  
2 **into the Harper Lake Basin—But it Does Not Flow Into the SMR Property.**

3 Curiously, MWA attempts to refute something SMR does not argue. Specifically, all  
4 parties agree that water from the Mojave River flows through the Hinkley gap and into the Harper  
5 Lake basin. The important distinction which follows, however, is that the water flowing from the  
6 Mojave River does *not* enter the SMR Property. The SMR Property is at a higher elevation than  
7 the Harper Dry Lake playa area, and therefore water flowing through the Hinkley gap will not  
8 reach the SMR Property but instead will flow down into the Harper Dry Lake playa area.

9 (Morgan Suppl. Decl. at ¶¶ 10-20; *see also* Morgan Decl. at ¶¶ 53-57.) This conclusion is  
10 supported by the very same materials cited by MWA, including the CSUF report. (Morgan  
11 Suppl. Decl. at ¶¶ 16-20, Ex. 1.) This distinction is crucial, but not addressed in MWA’s briefing.

12 **III. MWA Ignores Key Hydrogeological Characteristics of SMR’s Property, and Fails to**  
13 **Properly Distinguish Other Factors Such as Connectivity and Radio-Carbon Dating.**

14 MWA fails to address numerous of the key scientific criteria identified by SMR in its  
15 Motion that establish the hydrologic disconnection between both (a) the shallow and deep  
16 aquifers underneath the SMR Property, and (b) SMR’s aquifers and the adjudicated waters of the  
17 Judgment. This includes, for example only and without limitation:

- 18 • That there are numerous other potential sources of water that supply the SMR Property,  
19 instead of the Mojave River, including: groundwater that flows in from the “Water  
20 Valley” area to the northeast; groundwater that flows in from the northwest; and water  
21 that falls in the form of precipitation and percolates into the groundwater.<sup>2</sup> (Morgan  
22 Decl. at ¶¶ 58-62, Figure 3; Morgan Suppl. Decl. at ¶ 19.)
- 23 • That substantial water quality differences between (a) the shallow aquifer, and (b) off-  
24 Property USGS wells indicate that the water underlying the SMR Property is  
25 hydrologically disconnected from the rest of the Mojave Basin. (Morgan Decl. at ¶¶ 69-  
26 72.)
- 27 • That the absence of tritium in both the shallow and deep aquifers indicates that both  
28 aquifers are hydrologically disconnected from the Mojave River and the adjudicated  
waters of the Judgment. (Morgan Decl. at ¶¶ 105-106.)

<sup>2</sup> MWA concedes, as it must, that precipitation falls over the area and is another source of water.  
(MWA Opp. at p. 8.)

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- 1           • That pumping of SMR’s groundwater does not impact the rest of the Mojave Basin. The  
2 Peterson Declaration argues only that groundwater levels *in the Harper Lake basin*  
3 *dropped* over the preceding years—it does not argue that the groundwater levels *under*  
4 *the SMR Property* dropped. (See MWA Opp. at pp. 13-14 (addressing results from wells  
5 “in the southern part” and “in the southeastern part” of the Harper Lake basin, whereas  
6 the SMR Property is located in the northeastern part of the basin).) Indeed, the  
7 documented evidence that does exist for the SMR Property indicates that groundwater  
8 levels surrounding the SMR Property *did not fall* due to pumping of the shallow aquifer.<sup>3</sup>  
9 (Morgan Decl. ¶¶ 22, 28, 63-68; Morgan Suppl. Decl. ¶ 23-24.)

10           MWA concedes additional facts, including that substantial water quality differences  
11 between (a) the shallow aquifer and (b) the deep aquifer indicate that the two aquifers are  
12 hydrologically disconnected from each other. (Compare Morgan Decl. at ¶¶ 86-85 with MWA  
13 Opp. at p. 10 [“Nonetheless, the limited groundwater sample data from SMR’s single test well  
14 indicates the deeper aquifer is much older than the shallow aquifer and may be largely isolated  
15 from the shallow aquifer.”].)

16           On the two points MWA attempts to argue, MWA fails to refute SMR’s evidence.

17           **First**, MWA’s contention that the radiocarbon dating reflects only movement of Mojave  
18 River water is inaccurate. As explained above, groundwater contouring demonstrates that the  
19 Mojave River water does not flow to the SMR Property, and therefore SMR’s water cannot be  
20 from the Mojave River regardless of its radiocarbon age. (Morgan Suppl. Decl. at ¶¶ 10-20,  
21 Ex. 1.)

22           **Second**, MWA’s argument that the Statement of Decision’s<sup>4</sup> references to “little  
23 groundwater movement” and the existence of “several faults that obstruct groundwater flow” do  
24 nothing to detract from SMR’s position. (MWA Opp. at p. 7.) In fact, the Statement of Decision  
25 would only strengthen SMR’s position. The Statement of Decision describes the limited  
26 connection between the Harper Valley basin and the Mojave River, which limited connection is  
27 also stated in the Judgment. (SMR Mot. at p. 6 [citing to Judgment at Ex. F, pp. F-6 through F-  
28

<sup>3</sup> Moreover, not even the Peterson declaration asserts that SMR’s pumping is depriving the pumpers near the Mojave River of any supply. Even the Judgment recognizes there is no physical, wet connection running from the SMR site down to Barstow or even interferes with any well pumping anywhere. (Judgment at Ex. F, pp. F-6 through F-7.)

<sup>4</sup> SMR separately objects to MWA’s request to judicially notice the Statement of Decision, which objection is filed concurrently with this reply.

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1 7.) However, the Statement of Decision does not address where the water underneath the SMR  
2 Property originates from. Indeed, the water underneath the SMR Property is not from the Mojave  
3 River and is therefore not part of the waters adjudicated under the Judgment. (Morgan Suppl.  
4 Decl. ¶ 25.)

5 In all, the substantial evidence presented by SMR was not refuted by MWA, and supports  
6 SMR's request for a reasonable and clear interpretation of the Judgment to exclude SMR's water  
7 from the Judgment's provisions.

8 **IV. The Judgment's Definition Of "Supplemental Water," And Lack Of Any Definition**  
9 **of "Recycled Water" or "Native Water," Undermines MWA's Attempts To**  
10 **Misinterpret The Judgment And Mislead The Court.**

11 A plain reading of the Judgment makes clear the water underlying the SMR Property is  
12 "Supplemental Water" as defined in the Judgment. MWA is wrong on this argument for at least  
13 three separate and independent reasons.

14 *First*, and as MWA concedes, supplemental water is *not* confined to water imported into  
15 the Mojave Basin. (MWA Opp. at p. 4.<sup>5</sup>) The Judgment defines "Supplemental Water" as:

16 Water imported to the Basin Area from outside the Basin Area, water that would  
17 otherwise be lost from the Basin Area but which is captured and made available  
18 for use in the Basin Area, or any Producer's share of Free Production Allowance  
19 that is not Produced and is acquired by Watermaster pursuant to this Judgment.

20 (Judgment at p. 13, § (II)(A)(4)(II).) This definition was carefully crafted to include both  
21 imported *and* non-imported sources of supplemental water. For example, this definition includes  
22 recycled water. Recycled water is not imported water, but would still be supplemental water to  
23 the basin under the Judgment's definition. Indeed, there is no separate definition for recycled  
24 water in the Judgment precisely because the definition of "Supplemental Water" was intended to  
25 include non-imported sources of supplemental water, such as recycled water. Logically, this  
26 definition would also, therefore, include the water underlying the SMR Property. If SMR were to

27 <sup>5</sup> Curiously, MWA at one point argues that SMR's water "would be considered to be 'imported'  
28 *and* 'supplemental water' ..." (MWA Opp. at 7 [emphasis added].) But MWA also argues  
SMR's water is not imported. In any event, imported water and supplemental water are not  
synonymous, and supplemental water need not be imported.

1 not pump this water—which water was *not* included in the Judgment’s safe yield nor allocations  
2 by MWA’s own admission<sup>6</sup>—then it would indeed be “lost if not captured.”

3 *Second*, MWA’s use of the terms “native water” and “groundwater” are both wrong and  
4 intentionally misleading.

5 First, “native water” is not defined in the Judgment. And, that specific term is only used  
6 one (1) time—in the introduction to describe the content of MWA’s cross-complaint. (Judgment  
7 at p. 1, § I(B).) As such, “native water” is *not* a part of the Judgment and does not bear on this  
8 Court’s analysis of what is or is not “Supplemental Water.”

9 Second, MWA tries to change the meaning of the term “groundwater.” The Judgment  
10 defines groundwater broadly to include both adjudicated and non-adjudicated water. The defined  
11 term “groundwater” is a scientific-based term used to distinguish water that is underground from  
12 surface water sources, such as “Storm water,” lakes, or the Mojave River. (*See, e.g.*, Judgment at  
13 p. 12 § (II)(A)(4)(hh) (distinguishing “total surface flow originating from precipitation and  
14 runoff” from water that has “percolated to Groundwater storage in the zone of saturation”).) As  
15 such, groundwater may be “Supplemental Water,” and they are not mutually exclusive. Any  
16 argument about whether or not water is “Groundwater,” as defined in the Judgment, is irrelevant  
17 to interpreting how the water underlying SMR’s Property is regulated or not under the Judgment.  
18 In this respect, “SMR does not dispute that the aquifers beneath its Property meet the foregoing  
19 definitions of ‘Groundwater’”—because any water below the ground, anywhere, would  
20 technically satisfy this definition. (MWA Opp. at p. 6.)

21 In all, the relevant term for this Court to consider is the Judgment’s defined term of  
22 “Supplemental Water,” which clearly includes non-imported water. The term “native water” is  
23 simply not part of the Judgment, and the term “Groundwater” is solely used in a scientific sense  
24 to describe water below the earth’s surface. SMR does not raise arguments about either of these  
25 two terms because such arguments would be irrelevant and unnecessary for the Court to resolve  
26

27 \_\_\_\_\_  
28 <sup>6</sup> “So far as is known, the calculations of production safe yield made before entry of the January  
10, 1996, Judgment did not include the aquifers beneath SMR’s Property ...” (MWA Opp. at p.  
13.)

1 the SMR Motion. (*See* MWA Opp. at p. 5 [suggesting “SMR does not dispute” facts related to  
2 “natural water supply”].)

3 **Third**, MWA provides no evidence that SMR’s water is not supplemental water.  
4 Importantly, neither (1) the shallow aquifer underlying the SMR Property, nor (2) the deep  
5 aquifer underlying the SMR Property are included in the basin’s safe yield or allocations in the  
6 Judgment, and therefore this water is not included in the Judgment and must be “Supplemental  
7 Water.” (*See* MWA Opp. at p. 13.)

8 As to the shallow aquifer, SMR’s predecessor was dismissed from the Judgment. (*See*  
9 SMR Mot. at p. 5.) That dismissal specifically excluded from the Judgment the shallow aquifer  
10 that was in use at the time the Judgment was entered. Despite MWA’s knowledge that SMR’s  
11 predecessor was pumping thousands of acre feet of water from SMR’s Property each year, MWA  
12 did not seek to adjudicate that water, and allowed it to be pumped without being subject to the  
13 Judgment. It is, therefore, “Supplemental Water.”

14 As to the deep aquifer, it was only recently discovered to underlie the Property and was  
15 not part of the Judgment’s safe yield or allocations. (Morgan Decl. ¶¶ 24-25.) It was therefore  
16 never a part of the Judgment and is also “Supplemental Water.”

17 In sum, the water underlying the SMR Property is “Supplemental Water” because it fits  
18 the plain definition of that term, was not adjudicated previously under the Judgment, it will be  
19 lost if not pumped, and it will augment the basin’s safe yield as defined in the Judgment.

20 **V. MWA Fails To Identify Any Procedural Issues Meriting Denial Of SMR’s Motion.**

21 MWA asserts three procedural hurdles merit denial of SMR’s motion. None save MWA.

22 **A. SMR Has Standing to Bring Its Motion.**

23 SMR states clearly that it is not a Party to the Judgment, and it does not seek to be. (SMR  
24 Mot. at pp. 2, 5.) As MWA concedes, even though SMR is not a Party, it still has standing.  
25 (MWA Opp. at p. 3.) That is because SMR may be “directly affected” by the Judgment. (*See*  
26 Code Civ. Proc. § 473, subd. (d); *People ex rel. Reisig v. Broderick Boys* (2007) 149 Cal.App.4th  
27 1506, 1518; *People v. Gonzalez* (1996) 12 Cal.4th 804, 818-19; *see also Eyak Native Village v.*  
28 *Exxon Corp.* (9th Cir. 1994) 25 F.3d 773, 777 [“A nonparty may seek relief from a judgment

1 procured by fraud if the nonparty's interests are directly affected.”]; *In re La Sierra Financial*  
2 *Services, Inc.* (9th Cir. BAP 2003) 290 B.R. 718, 730.)

3 Here, SMR acknowledges the impact the Judgment may have on it by the simple act of  
4 filing its Motion. If SMR were not potentially “directly affected” by the Judgment, then there  
5 would be no need for SMR to clarify and interpret the Judgment in the first place. But SMR,  
6 acknowledging that the Judgment may “directly affect” SMR, promptly sought clarification from  
7 this Court regarding SMR’s rights and obligations. For this forthright approach, it should be  
8 condoned, not penalized.

9 The point of SMR identifying and raising the Judgment’s broad definition of “Party” was  
10 to point out that the language was inclusive, including contemplating that there are “otherwise”  
11 ways for persons to become interested in the Judgment beyond just stipulation, default, or trial.  
12 (Judgment at pp. 10-11 § (II)(A)(4)(v) [“Party” includes “Any Person(s) ... who ... has become  
13 subject to this Judgment either through stipulation, default, trial *or otherwise*.” (emphasis  
14 added)].)<sup>7</sup> Paragraph 40 of the Judgment also references that “Persons” may seek clarification as  
15 to the Judgment. (Judgment at p. 44, § 40.) In essence, the intent of this language is to permit  
16 SMR to proceed precisely as it has—to, out of an abundance of caution, request Court  
17 interpretation of the Judgment even though SMR is not a party to the Judgment. And, this broad  
18 language is consistent with California law that finds a person has standing where they may be  
19 “directly affected” by a judgment, such as the Judgment here.

20 **B. MWA Has Repeatedly Attempted to Block SMR From Fairly Representing**  
21 **Itself in the San Bernardino Action.**

22 MWA mischaracterizes what it has done in the San Bernardino Action. As briefed  
23 separately in the San Bernardino Action, MWA attempted to bring SMR into that separate case  
24 without notice and without service of process. Moreover, MWA seeks far more than just adding  
25

26 <sup>7</sup> MWA makes noise about SMR’s alleged misquoting of paragraph 19 of the Judgment.  
27 However, paragraph 19 is properly quoted on page 13 of SMR’s Motion. (SMR Mot. at p. 13.)  
28 The reference to paragraph 19 on page 15 of the SMR Motion misstates solely the term “Person,”  
which SMR readily admits is not in paragraph 19 of the Judgment and was inadvertently included  
in the Motion as a scrivener’s error. The remainder of the quoted language, however, is accurate  
and included in paragraph 19 of the Judgment (as that provision was amended in 2002).



1 SMR as a defendant—its initial motion in the San Bernardino Action addresses many of the same  
2 arguments raised here, including MWA’s argument that SMR’s water is not “Supplemental  
3 Water” as defined in the Judgment. Solely because of its own independent research, SMR  
4 discovered that the San Bernardino Action existed, and that MWA was attempting to make SMR  
5 a party to that separate case. SMR has briefed its defenses in that separate action, and will  
6 present those arguments to the Court at the consolidated February 7 hearing. The issues raised in  
7 the SMR Motion were properly raised in this action because it seeks an interpretation and  
8 clarification of the Judgment. In any event, it is indeed ironic that MWA states “SMR will have  
9 its full due process rights” when it is MWA, in the first instance, that attempted to deprive SMR  
10 of those very rights. (MWA Opp. at p. 4.)

11 **C. The SMR Motion is Not a Motion for Summary Judgment, and Information**  
12 **Has Been Presented to This Court by Both Parties Sufficient for Court**  
13 **Resolution.**

14 As a final attempt to improperly dismiss the SMR Motion and deny SMR its right to be  
15 heard, MWA raises in their penultimate sentences a reference to the SMR Motion being a motion  
16 for summary judgment. Tellingly, though, MWA raises no substantive argument on that point in  
17 the body of its brief, and fails to cite any applicable law to explain how SMR’s Motion is a  
18 motion for summary judgment or why that would prevent this Court from appropriately ruling on  
19 the papers before it. Moreover, MWA actually presents two separate declarations—the  
20 declaration of David Peterson and the declaration of Robert Wagner—to try to refute Mr.  
21 Morgan’s assertions. MWA’s engagement with the substance alone should waive its right to  
22 claim it needs more time to brief the papers.

23 Regardless, and at a minimum, the only reasonable outcome for this complaint would be  
24 to permit MWA time to further consider hydrological work concerning the SMR Property under  
25 court supervision. The result would not, as MWA requests, be to wholly dismiss SMR’s Motion.

26 **VI. CONCLUSION**


27 This Court has a duty to fulfill the constitutional mandate that “requires that the water  
28 resources of the State be put to beneficial use to the fullest extent of which they are capable...”  
(Cal. Const. Art. X, § 2.) Granting the SMR Motion would fulfill that duty, and is supported by

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substantial legal and scientific bases. SMR has presented clear and reliable scientific evidence of the hydrologic disconnection between the water underlying the SMR Property, on the one hand, and the water underneath the rest of the Mojave Basin that was adjudicated by the Judgment, on the other hand. SMR respectfully asks that this Court grant its motion and clarify that SMR’s proposed plan to pump and sell supplemental water from the deep aquifer and shallow aquifer is not subject to the Judgment.

Dated: January 31, 2024

BEST BEST & KRIEGER LLP

By: 

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**Proof of Service**

I, Vanessa Guillen-Becerra, declare:

I am a citizen of the United States and employed in San Bernardino County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2855 E. Guasti Road, Suite 400, Ontario, California 91761. On January 31, 2024, I served a copy of the within document(s):

**SPECIALY-APPEARING PETITIONER SHADOW MOUNTAIN RANCH, LLC'S REPLY TO MOJAVE WATER AGENCY'S OPPOSITION TO SMR'S MOTION TO INTERPRET AND CLARIFY THE JUDGMENT**

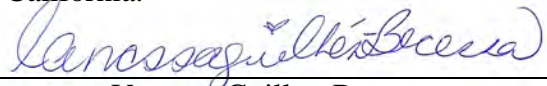
- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Ontario, California addressed as set forth below.
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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 31, 2024, at Ontario, California.



\_\_\_\_\_  
Vanessa Guillen-Becerra

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**Service List**

**In re City of Barstow, et al v. City of Adelanto, et al**  
**Riverside Superior Court Case No. CIV208568**

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COUNTY OF SAN BERNARDINO}**

I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 13846 Conference Center Drive, Apple Valley, California 92307.

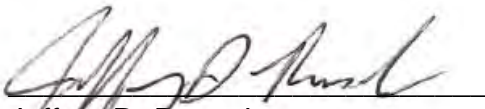
On February 1, 2024, the document(s) described below were served pursuant to the Mojave Basin Area Watermaster’s Rules and Regulations paragraph 8.B.2 which provides for service by electronic mail upon election by the Party or paragraph 10.D, which provides that Watermaster shall mail a postcard describing each document being served, to each Party or its designee according to the official service list, a copy of which is attached hereto, and which shall be maintained by the Mojave Basin Area Watermaster pursuant to Paragraph 37 of the Judgment. Served documents will be posted to and maintained on the Mojave Water Agency’s internet website for printing and/or download by Parties wishing to do so.

Document(s) filed with the court and served herein are described as follows:

**SPECIALY-APPEARING PETITIONER SHADOW MOUNTAIN RANCH, LLC’S REPLY TO MOJAVE WATER AGENCY’S OPPOSITION TO SMR’S MOTION TO INTERPRET AND CLARIFY THE JUDGMENT**

  X   (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 1, 2024 at Apple Valley, California.

  
\_\_\_\_\_  
Jeffrey D. Ruesch

## Mojave Basin Area Watermaster Service List as of February 01, 2024

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(econorx@yahoo.com)  
Im, Nicholas Nak-Kyun (via email)  
23329 Almarosa Ave.  
Torrance, CA 90505-3121

Irvin, Bertrand W.  
3224 West 111th Street  
Inglewood, CA 90303-

Attn: James Jackson Jr.  
Jackson, James N. Jr Revocable Living Trust  
1245 S. Arlington Avenue  
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## Mojave Basin Area Watermaster Service List as of February 01, 2024

Attn: Lawrence Dean  
Jackson, Ray Revocable Trust No. 45801  
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Redlands, CA 92375-1450

Attn: Audrey Goller  
(audrey.goller@newportpacific.com)  
Jamboree Housing Corporation (via email)  
15940 Stoddard Wells Rd - Office  
Victorville, CA 92395-2800

Attn: Gary A. Ledford  
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Jess Ranch Water Company (via email)  
906 Old Ranch Road  
Florissant, CO 80816-

Johnson, Carlean  
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Attn: Paul Johnson  
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Johnson, Paul - Industrial (via email)  
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Johnson, Ronald  
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Dammeron Valley, UT 84783-5211

Attn: Lawrence W. Johnston  
Johnston, Harriet and Johnston, Lawrence W.  
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Hesperia, CA 92340-1472

Attn: Magdalena Jones  
(mygoldenbiz9@gmail.com)  
Jones Trust dated March 16, 2002 (via email)  
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Lucerne Valley, CA 92356-7237

Jones, Joette  
81352 Fuchsia Ave.  
Indio, CA 92201-5329

Attn: Paul Jordan  
Jordan Family Trust  
1650 Silver Saddle Drive  
Barstow, CA 92311-2057

Attn: Ray Gagné  
Jubilee Mutual Water Company  
P. O. Box 1016  
Lucerne Valley, CA 92356

Attn: Lee Logsdon  
Juniper Riviera County Water District  
P. O. Box 618  
Lucerne Valley, CA 92356-0618

Attn: Ash Karimi  
Karimi, Hooshang  
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Los Angeles, CA 90024-

Attn: Robert R. Kasner  
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Chino, CA 91710-

(Robertkasner@aol.com)  
Kasner, Robert (via email)  
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Newberry Springs, CA 92365

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Kemper Campbell Ranch  
10 Kemper Campbell Ranch Road - Office  
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Attn: Catherine Cerri  
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8581 Santa Monica Blvd., #18  
West Hollywood, CA 90069-4120

Attn: Nancy Lan  
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230 Hillcrest Drive  
La Puente, CA 91744-4816

Attn: c/o J.C. UPMC, Inc. Lori Rodgers  
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timrohmbuilding@gmail.com)  
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## Mojave Basin Area Watermaster Service List as of February 01, 2024

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Attn: Vanessa Laosy  
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Hesperia, CA 92345-

Attn: Robert Lawrence Jr.  
Lawrence, William W.  
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Lawson, Ernest and Barbara  
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17241 Bullock St.  
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Attn: Brad Francke  
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Upland, CA 91785-0670

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Water) Corp. (via email)  
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Low, Dean (via email)  
3 Panther Creek Ct.  
Henderson, NV 89052-

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Attn: Manoucher Sarbaz  
Lucerne Valley Partners  
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Attn: Olivia L. Mead  
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Attn: David I. Milbrat  
Milbrat, Irving H.  
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Attn: Donna Miller  
Miller Living Trust  
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Attn: Freddy Garmo (freddy@garmolaw.com)  
Minn15 LLC (via email)  
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Attn: David Riddle  
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Attn: Ken Elliot (Billie@ElliotPlace.com)  
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Attn: Jeff Gaastra (jeffgaastra@gmail.com)  
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Newberry Springs, CA 92365-

Attn: Mary Ann Norris  
Norris Trust, Mary Ann  
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9876 Moon River Circle  
Fountain Valley, CA 92708-7312

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## Mojave Basin Area Watermaster Service List as of February 01, 2024

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Attn: Kody Tompkins  
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Attn: Dorothy Ohai  
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Chino, CA 91710-5149

Attn: Craig Maetzold  
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Attn: John P. Oostdam  
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24953 Three Springs Road  
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Attn: Nick Higgs  
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Attn: Taghi Shoraka  
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District (via email)  
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Porter, Timothy M.  
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Precision Investments Services, LLC  
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Price, Donald and Ruth  
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Quakenbush, Samuel R. (via email)  
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## Mojave Basin Area Watermaster Service List as of February 01, 2024

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Attn: Bill Taylor or Property Mngr  
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Short, Jerome E.  
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Rivero, Fidel V.  
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Corona, CA 92879-0825

Attn: Susan Sommers  
Rossi Family Trust, James Lawrence Rossi  
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Attn: Dale W. Ruisch  
Ruisch Trust, Dale W. and Nellie H.  
10807 Green Valley Road  
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Attn: Sara Fortuna (sarajfortuna@gmail.com;  
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Saba Family Trust dated July 24, 2018 (via email)  
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San Clemente, CA 92672-5468

San Bernardino Co Barstow - Daggett Airport  
268 W. Hospitality Lane, Suite 302  
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## Mojave Basin Area Watermaster Service List as of February 01, 2024

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Attn: Chan Kyun Son  
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Attn: Joe Trombino  
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Thomas, Stephen and Lori  
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