

1 Dominick Gulli
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6 *In propria persona (pro per)*

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8 SAN JOAQUIN COUNTY SUPERIOR COURT
STOCKTON BRANCH

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10 Dominick Gulli PE, PLS,
Petitioner,

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12 vs.

13 SAN JOAQUIN AREA FLOOD CONTROL
14 AGENCY; and preparers: ICF
INTERNATIONAL, INC.; PETERSON
15 AND BRUSTAD, INC.; MOFFATT AND
16 NICHOL;
17 and
DOES 1 through 100, INCLUSIVE
18 Respondents.

19 REAL PARTIES IN INTEREST
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) Case No.:
)
) NOTICE OF INTENT TO COMMENCE
) ACTION AGAINST SAN JOAQUIN AREA
) FLOOD CONTROL AGENCY; ICF
) INTERNATIONAL.; PETERSON AND
) BRUSTAD; MOFFATT AND NICHOL;
)
) PETITION FOR WRIT OF MANDATE (CCP
) 1085) OR ADMINISTRATIVE
) MANDAMUS (CCP 1094.5); CALIFORNIA
) ENVIROMENTAL QUALITY ACT (CEQA),
) (PUB. RES. CODE SECTIONS 21000 ET
) SEQ.); COMPLAINT FOR
) DECLARATORY RELIEF AND
) INJUNCTIVE RELIEF (CCP 1060)

27 NOTICE OF INTENT TO COMMENCE ACTION AGAINST SAN JOAQUIN AREA FLOOD CONTROL
28 AGENCY; ICF INTERNATIONAL.; PETERSON AND BRUSTAD; MOFFATT AND NICHOL;

PETITION FOR WRIT OF MANDATE (CCP 1085) OR ADMINISTRATIVE MANDAMUS (CCP
1094.5); CALIFORNIA ENVIROMENTAL QUALITY ACT (CEQA), (PUB. RES. CODE SECTIONS 21000
ET SEQ.); COMPLAINT FOR DECLARATORY RELIEF AND INJUNCTIVE RELIEF (CCP 1060)

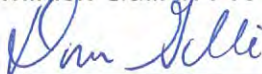
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2 To SJAFCA et al, PLEASE TAKE NOTICE. Under Public Resources Code
3 section 2167.5 that Petitioner DOMINICK GULLI hereby intends to file a petition of writ
4 of mandate under the provisions of the California Environmental Quality Act (CEQA)
5 against the SAN JOAQUIN COUNTY AREA FLOOD CONTROL AGENCY, ICF
6 INTERNATIONAL, INC., PETERSON AND BRUSTAD, INC., MOFFAT AND NICHOL,
7 challenging the adoption of a CEQA Notice of Intent, Final Environmental Impact Report
8 and the Findings of Fact and Statement of Overriding Considerations with regards to the
9 SMITH CANAL GATE. Petitioner also intends to file a Complaint for Declaratory Relief
10 for the SMITH CANAL GATE.
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13 The lawsuit will be filed based on violations of CEQA, The Public Contracting
14 Code and Proposition 218 procedures and other applicable laws as discussed more
15 fully in the Projects administrative and environmental review proceedings. The exact
16 nature of the allegations and relief sought is described in a Petition for Writ of Mandate
17 that Petitioner intends to file on December 21, 2015.
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21 Respectfully

22 Dated 12/18/15

23 Dominick Gulli in Pro Per



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27 NOTICE OF INTENT TO COMMENCE ACTION AGAINST SAN JOAQUIN AREA FLOOD CONTROL
28 AGENCY; ICF INTERNATIONAL.; PETERSON AND BRUSTAD; MOFFATT AND NICHOL;

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