

October 28, 2021

VIA E-MAIL & FEDERAL EXPRESS
(SPreservations20@aol.com)

Jeff Barry
3062 Rollings Ave.
Thousand Oaks, CA 91360-6430

Re: Your proposed “presentation” about the “criminal investigation” of the 11.18.2014 incident at 815 Mission Rock Rd. / November 2, 2021 @ 6:30 pm at the Regency Santa Paula 7 movie theater

Mr. Barry:

This firm represents C3 Capital Partners II, LP and C3 Capital Partners III, LP, the current owners of Santa Clara Waste Water Company (“SCWW”) and SCWW’s senior secured creditor. We were recently informed that you have arranged to make a “presentation” regarding the “criminal investigation” related to the November 18, 2014 incident at SCWW’s former waste water treatment facility located at 815 Mission Rock Road (the “Facility”). We could not help but notice that you scheduled this “presentation” to occur shortly before the November 8 community meeting to be held by the Resource Management Agency, Planning Division, to discuss the proposed project and the draft environmental document in connection with Ri-Nu Environmental, LLC’s (“Ri-Nu”) application for a CUP Permit to re-open the facility, and that you are using your prior position and presumably information you obtained while acting as an investigator for the Ventura County District Attorney’s office to promote the same.

It is clear that there is no legitimate reason for you to intentionally insert yourself into this process and that your sole reason for doing so is to intentionally interfere with Ri-Nu’s ability to secure a CUP Permit for the Facility and its efforts to re-open and operate the same. You should be aware that in doing so, you are also injuring (intentionally or otherwise) those individuals who claimed to have been injured as a result of the incident and its aftermath – the very people the District Attorney’s office sought to protect – as their right to restitution is expressly contingent upon Ri-Nu securing the necessary permits to re-open and operate the Facility. Have you checked with the District Attorney’s office regarding your intended course of action and the information you intend to publicly disclose; all of which you obtained in the course of your work for that office and which you undoubtedly were prohibited from taking with you after your employment was terminated? Have you spoken to them about the fact that your actions will harm the very people that office has sought to protect? Or that you continue to hold yourself out as an investigator for the District Attorney’s office on your LinkedIn page?

Jeff Barry
October 28, 2021
Page 2

You need to be extremely careful with regard to what you do, say and disclose during your proposed “presentation.” Although you had certain protections while acting on behalf of the District Attorney’s office in your official capacity, as a private citizen, those protections are gone, and like everyone else, you are subject to civil liability, including punitive damages, if you make or republish any false or defamatory statements (including the republication of any false testimony given during the grand jury proceedings) about our clients, the Facility (which they have an interest in through SCWW and as senior secured creditors), Ri-Nu, or any other person or entity, including the individuals who were defendants in the action brought by the District Attorney’s office. If we learn that you made any false or defamatory statements during your “presentation,” you are hereby advised that our clients and those harmed by your actions will take all actions necessary and appropriate to protect their interests to the maximum extent permissible under the law. Govern yourself accordingly.

Sincerely,
Greer S. Lang



Cc: Leonard B. Rose, Esq.

