

ST. CLAIR STATEMENTS IN SUPPORT OF APPEAL

1. Our names are Carl and Susan St. Clair. We have personal knowledge of the facts set forth in this statement and, if called as a witness, could testify competently thereto.
2. We make this statement in support of our appeal of the City of Laguna Beach ("City") Design Review Board's ("DRB") decision to approve the major remodeling project ("Project") of the property located at 705 Marlin, Laguna Beach, California ("Property"). The Property is owned by William and Christina Dodge (collectively, "Owners").
3. We reside at 776 Kendall, Laguna Beach, which is located next door to the Property. We have been a part of the local community for more than 20 years and raised our family here. In or about September 2020, the Owners purchased the Property. We gladly welcomed them into our neighborhood.
4. Not long after purchasing the Property, we began to hear substantial demolition activities inside the home at various times, even during the middle of the night, around 2:00 a.m. The above work lasted for many months and we heard several confrontations between the Owners' contractor(s) and the workers. One weekend evening (around 7:30 p.m.), we heard jack-hammering at the Property. Susan and another neighbor went next door to ask them to stop, but were met by a worker,

who told Susan that the Owners told him to keep jack-hammering.

5. The construction activities (demolition, construction, etc.) inside the Property lasted for nearly a year, and ***we assumed that the Owners had obtained the necessary approvals and permits from the City to do the interior work.*** In the Summer of 2021, about a year after the work started, the Owners invited us over to their home and we were able to view the extensive interior work that was performed at the Property. We saw that a vaulted ceiling had been removed to build another bedroom, a new kitchen, a new bathroom, etc. During this visit, the Owners indicated for the first time that they were also going to be remodeling the outside of their home as well.

6. In the Summer of 2021, we started to notice that the Owners were now performing substantial exterior work on the Property, such as taking out windows and installing sliding doors on the upper level. When this occurred, we went to the City to review any plans or permits related to the Project. During this City visit, we learned for the first time that the only permits/ approvals for the Property (and the entire Project) was to replace a few windows, like-for-like and the corresponding stucco repair, at a cost of \$26,000. When we told Nicole Bovey at the City what was really happening at the Property (substantial interior and exterior work), she said that the work was not permitted and would contact Geri Ford about it.

7. A few months later (November 2021), we noticed that the Owners were now cutting multiple new openings for windows and doors at the Property, including full length windows facing our deck. After multiple calls to the City about unauthorized work occurring, we understand that a Stop Work Order ("SWO") was finally issued by the City to the Owners. However, even after the SWO was issued, work continued at the Property.

8. At a meeting at our home in December 2021, City official Dennis Bogle (along with Geri Ford and John Hand present) said "This is the worst case of code enforcement violations that I have ever witnessed ... and that it was a major safety issue." We learned right after this meeting that the Owners hired Steve Karatawani, a local influencer and that he was hired to help the Owners "beg for forgiveness" and that the Project would "all be approved" once he got involved.

9. After the SWO was issued and the permits revoked, the Owners began to yell and scream at several of the neighbors, using profanity and saying that they would "burn in hell". Even after the SWO was issued and the revocation of permits occurred, the construction on the Project continued to occur, as if the Owners could simply thumb their noses at the City in defiance.

10. From about January to May 2022, construction on the Project was on-again and off-again. When the City was not watching, construction would commence, and when the Owners

were caught by code enforcement, and violations were issued, construction would stop for a bit. In or about May 2022, during one such an discussion, Dr. Dodge accused us of calling a Councilwoman to complain. Dr. Dodge then told us: "We know people, too, with the City. ***We know the City Manager and somebody on the City Council, too. We have been assured that this is going to get approved.***" When I asked Dr. Dodge how he "knew", he said: "Steve [Karatawani] knows people on the DRB and he was positive this was going to all get approved."

11. Also in May 2022, Mrs. Dodge, in front of multiple people, telling us and our guests: "F... you, F...you all." This is just one of many examples of such conduct. When we contacted the City to report what was happening, we were assured that the City would get involved to calm the situation down and make sure no further work was done until it was approved and permitted. Did that stop the Owners -- no -- they continued to have work done on the Property.

12. After realizing they could not do any more secret work (at least on the outside], and after issuance of the SWO and revocation of permits, the Owners finally decided they should seek forgiveness from the City.

13. In or about October 2022, when the City further cited the Owners for unpermitted work, we could hear Mrs. Dodge yell out: "You need to talk to Peter Blake!" At or about this same time, a large "Vote for Peter Blake" sign was posted on the Owners'

Property. Also in October 2022, the Owners decided to again start working on the Project (in violation of the SWO and citations), and when Dennis Bogle was asked about it, he told John Vella "I tried to do something, but my superiors told me not to."

14. In November 2022, a meeting was held with several people, including Marc Weiner, Dennis Bogle, Garrett Wank, John Vella and us to discuss the ongoing violations and status of the DRB review. During this meeting, Susan and John Vella asked Mr. Bogle again why the unpermitted construction was being allowed to move forward, and Mr. Bogle responded: "***I tried, but I was told by my superiors not to take any action.***"

15. In or about early December 2022, DRB Member Louis Weil visited our home to assess the situation before the upcoming DRB Hearing. During this meeting, we asked Mr. Weil if he knew the Owners, and at first he said no, but then he admitted that he knew Dr. Dodge as they are on the same board (EDPC) together. Then, Susan asked Mr. Weil if Peter Blake had reached out to him about getting the Project approved, and Mr. Weil admitted that it had occurred. This conversation was witnessed by no less than four (4) people. Immediately after this conversation, Mr. Weil walked over and visited the Owners in their home.

16. On December 7, 2022, DRB Member Marc Weiner visited our home. During this visit, like the visit with Mr. Weil, Susan

asked Mr. Weiner if Peter Blake had reached out to him for help in approving the Project. Mr. Weiner responded, yes. As the favorable DRB members could not all be present at the December 2022 DRB Hearing, it was continued to January 2023.

17. Just prior to the January 2023 DRB Hearing, DRB Member Don Sheridan discussed the Project with us and another neighbor and stated: "no matter how much complaining you do, ***this project is going to be approved because the City Manager wants it to.***" Later on, Mr. Sheridan also stated: "if we don't approve this with an overwhelming majority, we'll have our heads handed to us."

18. On the day of the DRB hearing, DRB Member Jessica Gannon visited with the Owners at the Property. During this visit, we could see Mrs. Dodge and Ms. Gannon posing for photos on the second floor; when they saw us, we heard Ms. Gannon say "hurry up and close the doors before someone sees us." Notably, when Ms. Gannon had visited us at our home, she walked into the bedroom and immediately stated that she didn't see any privacy issue. Susan explained that the privacy issue was actually in the bathroom, but before Ms. Gannon even turned the corner to go into the bath and shower area she again said, "I don't see any issues."

19. At the beginning of the DRB hearing on January 26, 2023, Don Sheridan admitted that he had met with Peter Blake. Why would such a meeting even occur with a former City

Councilmember? Further, Ms. Gannon made a comment that the material on the proposed deck privacy screen should be as "reflective as possible" to create even further glare and privacy issues into our home and living spaces.

We declare that the foregoing is true and correct to the best of our knowledge.

Executed on this 21 day of March, 2023, at Laguna Beach,
California

A handwritten signature in black ink, appearing to read 'Carl St. Clair', written over a horizontal line.

Carl St. Clair

A handwritten signature in black ink, appearing to read 'Susan St. Clair', written below the signature of Carl St. Clair.

Susan St. Clair