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September 23, 2022

***By Email Only***

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County Counsel  
575 Administration Dr., Ste. 105A  
Santa Rosa, CA 95403

Re: **NOTICE OF POTENTIAL CLAIM**  
Illegal Firearm Use at 1700 Barlow Ln., Sebastopol, CA 95472  
Our File No. 15682

Dear Counsel:

Please allow this letter to serve a final notice of our clients' intent to file a complaint against the County of Sonoma for its failure to enforce its Small Arm Device Ordinance in regards to John Lobro's illegal firearm use at 1700 Barlow Lane in Sebastopol, California.

The clear and plain language of Chapter 19 of the Small Arm Device Ordinance restricts the use of firearms within 150 yard of "safety zones" which are defined as "any building, dwelling house, camp, or other place where human beings inhabit, assemble, frequent, or pass..."

Even though GPS mapping confirmed Mr. Lobro's firearm use is within the 150 yard "safety zone" of four neighboring parcels your office advised that "there did not appear to be a violation of this ordinance." (See email correspondence between Sita Kutieria and Pamela Stevens, dated July 27, 2022).

We request you reconsider your position that Mr. Lobro's firearm use does not constitute a violation. As we stated in prior correspondence, the County has well thought-out ordinances to ensure the public safety, health and welfare of its residents. It is imperative that these local ordinances are upheld and enforced especially when it relates to gun safety.



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If you continue to refuse to instruct the Sheriff's Department to enforce the Small Arms Device Ordinance as against Mr. Lobro, we will proceed with filing a lawsuit against the County of Sonoma.

In the event you agree to reconsider your position, we request you confirm in writing at your earliest convenience that you will instruct the Sheriff's Department to enforce the ordinance by referring the matter to the Sonoma County District Attorney's office for appropriate criminal prosecution pursuant to Small Arm Device Ordinance Chapter 19.A-5 which states that any person who discharges any small arm device within the "safety zone" is guilty of a misdemeanor ...punishable by imprisonment in the county jail or by a fine up to \$500 or by both fine and imprisonment the next time he discharges a firearm at 1700 Barlow Lane.

Please further be advised that no additional correspondence will proceed the filing of a civil lawsuit against the County of Sonoma on this issue.

Sincerely,

A handwritten signature in dark ink that reads "Pamela E. Stevens".

Pamela E. Stevens, Esq.

PES:pes

cc: Leo.Chyi@sonoma-county.org  
Lynda.Hopkins@sonoma-county.org