

Tyrone Clark

[REDACTED]
Boulder Creek, CA 95006

[REDACTED]
Boulder Creek, Ca., 95006

Santa Cruz County Board of Supervisors
c/o County Counsel's Office
701 Ocean Street, Room 505
Santa Cruz, CA 95060

RE: Transmittal of Demand Letter - Federal Civil Rights Action Pending

To Whom It May Concern:

Please find enclosed a formal 30-day demand letter pursuant to 42 U.S.C. §1983 and applicable state tort law, concerning longstanding and well-documented constitutional violations committed by the County of Santa Cruz and its agents.

This letter provides official notice of my intent to file a federal civil rights lawsuit in the United States District Court for the Northern District of California. The demand letter outlines a sustained pattern of abuse including retaliatory enforcement actions, malicious prosecution, unequal application of the law, selective code enforcement, and use of force without cause.

Key points substantiating this claim include:

- Sworn testimony of a former County Code Enforcement officer confirming a "tactics meeting" in which County officials and neighbors coordinated a plan to plant an endangered species on my land to block my development rights;
 - A criminal enforcement campaign under California Fish & Game Code §1602 despite the absence of environmental harm or proper agency jurisdiction;
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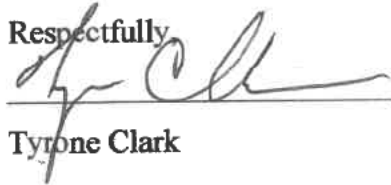
- A heavily militarized raid involving 15 personnel including armed deputies and Fish and Wildlife agents, executed the day after my fiancée and I learned we were expecting a child;

- A prosecutorial request for search and seizure at the close of trial with no legal justification, consistent with a broader pattern of retaliatory intent.

I am including this notice to afford the County an opportunity to resolve this matter without litigation. The remedies requested are clearly outlined in the demand letter, including access to building permits without obstruction or excessive fees, compensation for damages, and a cease to selective enforcement against me and my property.

Please confirm receipt of this letter and indicate whether the County intends to enter discussions during the 30-day window. Absent a resolution, I will proceed with the filing of a civil complaint in federal court.

Respectfully,



Tyrone Clark

Date: 13 June 2025

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Boulder Creek, CA 95006

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Santa Cruz County Board of Supervisors

c/o County Counsel's Office

701 Ocean Street, Room 505

Santa Cruz, CA 95060

RE: 30-Day Demand Letter - Federal Civil Rights Action Pending

Dear Members of the Board:

This letter serves as formal notice, pursuant to applicable law, that I intend to file a civil rights lawsuit against the County of Santa Cruz in the United States District Court for the Northern District of California unless the County provides appropriate relief within thirty (30) days of receipt of this letter.

Background and Summary of Claims

I have owned and occupied property in the rural Santa Cruz Mountains since 2003. From the outset, I was targeted by neighbors from an affluent and politically connected neighborhood located above my parcel, who conspired with a then-sitting County Supervisor and officials within the Santa Cruz County Planning Department, including Code Enforcement, to obstruct my ability to lawfully reside on or develop my land, as they had enjoyed use of this land for recreation, and enjoyed a relationship with the district 5 supervisor.

According to sworn testimony presented at my recent trial by a former Santa Cruz County Code Enforcement officer, who was assigned to attend said meeting, a "tactics meeting" took place in or around 2002, between those neighbors and County officials. The express purpose of that meeting was to coordinate strategies to prevent me from developing my property. My relationship was forged by a conspiracy between then district 5 county supervisor, Santa Cruz Planning department, and a

group of affluent and politically connected neighbors, and the efforts have been unceasing.

Among the strategies discussed at said meeting was the introduction of an endangered reptile species into my canyon in an effort to have the area designated as a biotic resource, which would trigger severe land-use restrictions, making development near impossible.

These efforts were accompanied by knowingly false allegations that I had illegally cut roads and constructed building pads without permits. However, I proved through direct evidence and multiple inspections by County agents, that these roads predated my ownership by at least 20 years, and likely more than 30. This was later corroborated by the same former Code Enforcement officer under oath.

Despite clear proof of these facts, I endured eight enforcement visits during my first year of ownership, each premised on baseless or disproven complaints. This pattern of conduct, which began with an organized attempt to take from me from the use of my property, has persisted in various forms for over two decades, culminating in a recent malicious prosecution under California Fish and Game Code §1602.

That prosecution was not grounded in evidence of environmental harm but was instead based on speculative and misidentified materials, unqualified testimony, and inflammatory statements intended to bias the jury, including a neighbor who the prosecutor knew, or should have known lied to law enforcement, and knew, or should have known would lie as a sworn witness, whose testimony was almost exclusively slanderous.

On May 12, 2022, the day after my fiancée and I learned she was pregnant, the County exercised a coordinated enforcement operation at my property involving at least fifteen personnel, including five armed Sheriff's deputies and agents from the California Department of Fish and Wildlife.

The scale and militarized nature of this action were grossly disproportionate to any credible risk, and appeared intended to intimidate rather than investigate.

While the County may attempt to justify such force based on prior charges that were filed against me years earlier, I assert, and have court records to support, that those charges were brought in the context of a violent and unlawful use of force against me

during an illegal search following a minor traffic stop. I was never convicted of assaulting officers, and the allegations served to cover excessive force used against me, where I was beaten bloody, after being stopped for a license plate light and my name was recognized by a disgraced SCSO watch captain, who I had filed a formal complaint against prior.

This pattern, which has been persistent and consistent, since 2001, or possibly since 1997, of attempting to deprive me of the lawful use of my land, my home, and of escalating enforcement under the pretext of "code enforcement" or "community risk" despite a lack of present threat, reflects a long-standing abuse of discretion and retaliation by Santa Cruz County personnel. I assert that the oppressive and draconian fees, required reports, and opposition to build homes in Santa Cruz are repugnant to the Constitution, and therefore, void.

Most tellingly, at the conclusion of my criminal trial, the prosecuting attorney, Ed Browne, requested a search and seizure order against me, a petty, punitive and unjustified escalation that served no legal necessity and instead underscored the retaliatory nature of this entire enforcement campaign.

These events are not isolated. In fact, they are consistent with findings documented in the Santa Cruz County Civil Grand Jury Report for 2002-2003, which investigated misconduct and mismanagement within County departments, including Planning and Code Enforcement. That report warned of systemic issues, including:

"Multiple complaints allege favoritism, arbitrary decisions, conflicting regulations and enforcement, abuse of authority, and even personal retaliation." (2002-2003 Grand Jury Report, p. 1) "Staff members are not held accountable for improper conduct, even when it is well-documented." (p. 2) "Certain individuals and neighborhoods are more heavily scrutinized or penalized, especially when they do not have political influence or personal ties to county staff." (p. 3)

The fact that this report was issued shortly before the County began its sustained campaign against me, using the same tactics identified in the report, underscores that the constitutional violations in my case were not accidental or isolated, but rather part of a broader and ongoing institutional problem.

Legal Basis for Claim

I intend to file a lawsuit under:

- 42 U.S.C. §1983 for violation of my rights under the First, Fourth, and Fourteenth Amendments, including:
 - Malicious prosecution
 - Abuse of process
 - Retaliation for protected activity
 - Violation of procedural and substantive due process
 - Unequal protection under the law
- Monell liability based on County policies and practices that enabled or ratified these constitutional violations.
- State law claims, including negligence, intentional infliction of emotional distress, and abuse of discretion, under the California Tort Claims Act, Government Code §810 et seq.

Demand for Resolution

To avoid litigation, I am willing to consider the following forms of relief:

- Vacate and full withdrawal any and all related convictions or code enforcement penalties.
- Cease and desist from further enforcement actions against me or my property without proper cause, notice, and supporting evidence.
- Monetary compensation for damages incurred, including legal fees, emotional distress, and interference with the lawful use of my property.
- Guaranteed issuance of building permits necessary for me to reside on and improve my property, with.
- A commitment from the County to refrain from bureaucratic delays or discretionary obstruction that goes beyond what is required by state law.
- The permit fees capped at a reasonable level, reflective of nationwide averages, or at minimum, fees limited to purely civil permitting expenses - without the excessive

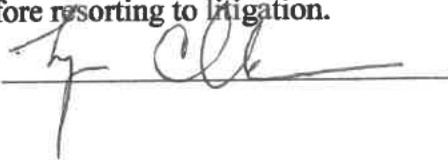
multipliers, environmental add-ons, or discretionary charges that Santa Cruz County is notorious for imposing.

- Formal review by an independent body (e.g., Civil Grand Jury or outside counsel) of the conduct of Planning, Code Enforcement, and the District Attorney's Office in my case.
- Public acknowledgment and correction of past misrepresentations to the court or to regulatory agencies.

If I do not receive a response within 30 days, I will proceed to file a civil complaint in federal court. This letter shall be admissible as evidence of my attempt to resolve the matter before resorting to litigation.

Respectfully,

13-june-2025

A handwritten signature in dark ink, appearing to read 'Tyrone Clark', is written over a horizontal line.

Printed Name: Tyrone Clark