

1 F. Art Aguilar, former General Manager of Central Basin, was deposed in an unrelated
2 Central Basin civil lawsuit in November, 2013. Mr. Aguilar served as General Manager for the
3 Central Basin at the time of the creation of the slush fund in June 2010. During the deposition,
4 with opposing counsel present, Mr Aguilar voluntarily disclosed Mr. Wance's specific legal
5 advice given to the Central Basin Board at the June 28, 2010 board meeting that it was proper to
6 keep the slush fund secret. Mr. Aguilar's specifically stated that Mr. Wance gave the advice in
7 closed session and further advised the Board that it was legal and proper to keep secret all
8 contracts relating to the trust fund. At the time of this testimony the Central Basin was
9 represented by independent attorneys. There was no objection whatsoever made to this
10 disclosure. There has been no subsequent effort to object to or prevent the disclosure of Mr.
11 Aguilar's testimony. The Board was aware of this testimony and did not object to it nor did it
12 take any other steps to prevent it from being disclosed. This testimony is currently available to
13 the public on the You Tube internet Web site.

14 41. As a direct and proximate result of the actions and omissions of the Defendants as alleged
15 herein the Plaintiff is entitled to damages in the amount of no less than \$1.75 million.

16 Additionally, Plaintiff is entitled to treble damages pursuant to Government Code §12651(a).
17 Costs and expenses of this action, a civil penalty of not less than five thousand five hundred
18 dollars (\$5,500) and not more than eleven thousand dollars (\$11,000) for each violation of the
19 California False Claims Act.

20 42. As a direct and proximate result of the actions and omissions of the Defendants as alleged
21 herein the Qui Tam Plaintiff Vasquez is entitled to a percentage of the damages as provided by
22 law.

23 43. Plaintiff is also entitled to reasonable and necessary attorney's fees incurred in initiating and
24 prosecuting this action.

25 WHEREFORE plaintiff prays for judgment against defendants as follows:

26 DEFENDANTS SEDGWICK, WANCE, AGUILAR and DOES 1 to 20:

- 27 1. Damages in the amount of no less than \$1 million;
- 28 2. Treble damages pursuant to Government Code §12651(a);