

March 2, 2018

Siskiyou County Court Clerk
311 Fourth St.
Yreka, CA 96097

Re: Peter Harrell v. Michele Hanson, Patricia Brown, and Sharrel Barnes #14-0671

To the Court,

I am a defendant in this case, and have been having problems with my lawyer, Robert Winston. I think he's breaking the law in this case, and others in this court involving the Hornbrook Community Services District.

This has lately caused more problems for me because he has threatened me about answers to discovery questions that were asked by the plaintiff Peter Harrell in this matter. I had trouble getting the questions done due to eye surgeries and other problems, and when I finally was able to send them to him as he had asked, he kept them for over a month before sending me completely changed and false answers to sign.

He has threatened me about settling this case, and with perjury charges, and harassed me about these answers, but I believe he was trying to keep them from Mr. Harrell all along, and now he is trying to intimidate me to lie for him and the other defendants, but I won't do it! I am waiving my attorney-client privilege for his letters.

I am attaching copies of Mr. Harrell's questions, the letter and answers I made to Mr. Harrell's questions and sent to Mr. Winston, the letters I got from Mr. Winston, and the false answers that Mr. Winston made up for me to sign to change my testimony. All my answers to Mr. Harrell's questions were the truth as best I know it, and are based on my own personal knowledge, although some things I found out by looking at documents, or because Michele Hanson told me (or tried to lie to me about). I also have records of emails, my time as Vice President of the HCSD, records from the Auditor's Office, and other documents that I looked through when answering the questions, and it is pretty obvious when you see the same kind of typing and kind of documents over and over where they come from. This case and a lot of the other cases Mr. Winston is involved in are a huge scam to take money from the HCSD and put it into his pocket instead of using County Counsel, or just getting the cases resolved quickly. He has put himself onto appeals and other cases the HCSD Board never approved, too.

I am sending these things to the court to be part of the case because I am afraid that Mr. Winston will not do that without changing them, and that he won't give my answers to Mr. Harrell. I don't want to get into trouble for not responding and get a judgment against me, or to be charged with perjury as Mr. Winston has threatened me with in the attached letters. I am sending copies of this to everybody concerned so it can be part of the record.

I swear the statements I made here, and in my attached answers to Mr. Harrell which are numbers 1 to 34 (but number 4 is missing), are true to the best of my knowledge, recollection, information, and belief, under penalty of perjury. All the copies attached are of documents I have at home. Signed in Hornbrook, CA.

Sincerely,

Sharrel M Barnes 3-2-2018

Sharrel M. Barnes, P.O. Box 395, Hornbrook, CA 96044 (530) 475-3725

Cc to: Peter Harrell, P.O. Box 131, Ashland, OR 97520
Robert D. Winston, P.O. Box 177, Mt. Shasta, CA 96067

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Attorneys' Assistants:
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September 12, 2017

Ms. Sharrel Barnes
P.O. Box 395
Hornbrook, CA 96044

Re: Harrell v. Hanson, Brown, Barnes - Special Interrogatories

Dear Sharrel:

As your attorneys of record, we received the enclosed Special Interrogatories, which are questions you must answer in writing and under oath. You must state only things within your personal knowledge, not what others may have told you.

Please write or type your answers and send them to me no later than **September 22nd**. If you do not understand some of them, state that. If you are unable to answer some, state that. When I have your preliminary answers, I will have them put into proper format and return them to you to review and sign.

If you have any questions, the best way to reach me is by email, at:
RWINSTON@KWB-LAW.NET

I will take this opportunity to remind you that this letter, the Interrogatories, your answers, and everything else relating to this case are strictly confidential and you should not discuss them with anyone else.

Even though Peter may have told you that he seeks no money from you, no must know by now that he is a liar, a criminal, and a sociopath who will turn on you as soon as he thinks it will benefit him to do so.

Thank you for your cooperation and assistance.

Sincerely,


Robert D. Winston

RDW/
Encls.

1 Peter T. Harrell
2 PO Box 131
3 Ashland, OR 97520

4 SUPERIOR COURT OF THE STATE OF CALIFORNIA
5 IN AND FOR THE COUNTY OF SISKIYOU

6 Peter T. Harrell,

7 Plaintiff,

8 vs.

9 Michele Hanson, et al,

10 Defendants

) Case No.: SCCVCV 14-0671

) PLAINTIFF PETER T. HARRELL'S
) SPECIAL INTERROGATORIES TO
) DEFENDANT SHARREL BARNES, SET #1

11 Propounding party: Peter T. Harrell
12 Responding party: SHARREL BARNES
13 Set Number: ONE (1)

14 To Defendant Sharrel Barnes:

15 Peter T. Harrell, the Plaintiff in the above cause of action, requests that you respond to each of
16 the following interrogatories, fully and under penalty of perjury, as required by the California
17 Code of Civil Procedure, within 30 days of service upon you of this request.

18 **INSTRUCTIONS**

- 19 a. Where name and identity of a person is required, please state the person's full name, home
20 address and also business address.
21 b. Where knowledge or information in possession of a party is requested, such request includes
22 knowledge of the party's agents, representatives, and unless privileged, his attorneys¹. When
23 answer is made by an agency, state the name, address and title of persons supplying the
24 information and making the affidavit, and announce the source of his or her information.
25 c. The pronoun "you" refers to the party to whom the Interrogatories are addressed.
26 d. "Identify" when referring to an individual, corporation, or other entity shall mean to set forth
27 the name and telephone number, and if a corporation or other entity, its principle place of
28 business, or if an individual, the present or last known home address, his or her job title or titles,
by whom employed and address of the place of employment.
e. The Hornbrook Community Services District shall be referenced herein by the acronym
"HCSO".
f. "List each occasion" as contained in any interrogatory shall mean that the date, time,
locations, and persons present (themselves identified as directed in "a", above) of the event or
circumstance which is the subject of the interrogatory shall be provided in any response.
g. The term "Plaintiff" shall mean the Plaintiff in this action, Peter T. Harrell.

29 Interrogatory Number 1: For the period of April 1, 2014 through June 30, 2014 list the date and
30 time, as well as the subject and nature, of each contact you had by telephone with Patricia Brown.

31 ¹ These Special Interrogatories do not seek privileged information, and should not be construed as
32 requesting any such.

1
2 Interrogatory Number 2: For the period of April 1, 2014 through June 30, 2014 list the date and time, as well as the subject, of each contact you had by email with Patricia Brown.

3 Interrogatory Number 3: For the period of April 1, 2014 through June 30, 2014 list the date and time, as well as the subject, location, and nature, of each contact you had in person with Patricia Brown.

4
5
6 Interrogatory Number 5: For the period of April 1, 2014 through June 30, 2014 list the date and time, as well as the subject and nature, of each contact you had by telephone with Michele Hanson.

7 Interrogatory Number 6: For the period of April 1, 2014 through June 30, 2014 list the date and time, as well as the subject and nature, of each contact you had by email with Michele Hanson.

8
9 Interrogatory Number 7: For the period of April 1, 2014 through June 30, 2014 list the date and time, as well as the subject, nature, and location, of each contact you had in person with Michele Hanson.

10
11 Interrogatory Number 8: During your term of office as a Director on the Board of the HCSD, did you at any time vote to repeal the voter approval requirements of any section of the HCSD Bylaws? If your answer is yes, please give the date, time, and location of any such vote.

12
13 Interrogatory Number 9: During your term of office as a Director on the Board of the HCSD, did you at any time vote to "eliminate" any of the Officer positions of the HCSD? If your answer is yes, please give the date, time, and location of any such vote.

14
15 Interrogatory Number 10: List each of the HCSD accounts that you had any interaction with Julie Bowles concerning from the period of April 1, 2014, through and including September 10, 2014, and for each account so listed, indicate what actions (if any) you and/or Julie Bowles took concerning the account.

16
17 Interrogatory Number 11: During the period of May 1, 2014 through July 1, 2014, was there any meeting between you, Michele Hanson, Patricia Brown, and/or any other members of the HCSD Board of Directors relating to the discussion of complaints, grievances, and/or performance of job duties by Plaintiff Peter Harrell concerning the positions he held of Assistant General Manager Trainee and/or Acting General Manager? If your answer is yes, please give the date, time, and location of any such meeting, as well as the substance of the conversations had at any such meeting

18
19 Interrogatory Number 12: On what date was the public meeting of the Board of Directors of the HCSD held at which the Plaintiff in this case, Peter T. Harrell, was removed from his position as Acting General Manager for the HCSD, and what was the resolution number that so removed him from that position?

20
21
22 Interrogatory Number 13: Describe why, and identify each fact that was relied on in support, for the Board's refusal to hire Plaintiff Peter Harrell as the General Manager of the HCSD during the period of May and June 2014.

1 Interrogatory Number 14: Did you ever observe any property belonging to the HCSD located at the
2 home of Michele Hanson between the April and July of 2014? If your answer is yes, please list and
describe each item of property that you saw.

3 Interrogatory Number 15: During the period of April 1, 2014 through August 1, 2014, were there
4 any meetings held by Michele Hanson and other persons that violated the Brown Act? If your
5 answer is yes, please list the date, time, location, and names of the attendees of each such meeting, as
well as the subjects discussed at each meeting so far as you are aware of them.

6 Interrogatory Number 16: During the period of April 1, 2014 through August 1, 2014, were there
7 any actions by Michele Hanson or other persons that violated any law of the State of California? If
8 your answer is yes, please list the date, time, location, and names of the actor taking any such action.

9 Interrogatory Number 17: Are you aware of any improper motive on the part of any HCSD Board
10 member concerning the refusal to hire Plaintiff Peter Harrell for the position of General Manager? If
11 your answer is yes, list and describe each fact or occurrence that you feel tends to support such a
conclusion.

12 Interrogatory Number 18: Was any action ever taken by the Board of the HCSD prior to June 20,
13 2014, which authorized Michele Hanson and Patricia Brown to write a letter on behalf of the HCSD
14 stating that, in substance, Peter Harrell had been removed from his positions as General Manager
Assistant Trainee, and Acting General Manager? If your answer is yes, please give the date and time
15 of the meeting where such authorization occurred, as well as the resolution number, if any.

16 Interrogatory Number 19: Was Robert Winston retained by formal action of the Board of the HCSD
17 on June 27, 2014, to bring a legal action against Plaintiff Peter Harrell? If your answer is yes,
specify the parameters of the legal action sought by the HCSD Board.

18 Interrogatory Number 20: Was Robert Winston retained by formal action of the Board of the HCSD
19 on June 27, 2014, to bring a legal action against Kimberly R. Olson? If your answer is yes, specify
the parameters of the legal action sought by the HCSD Board.

20 Interrogatory Number 21: For the period of April 1, 2014 through September 30, 2014 was Robert
21 Winston ever retained as general counsel for the HCSD?

22 Interrogatory Number 22: For the period of April 1, 2014 through September 30, 2014 did Robert
23 Winston ever create documents for use by the Board of the HCSD? If your answer is yes, please list
24 and describe such documents in as much detail as you can, along with any date of authorization by
the HCSD Board for Winston to create such documents, the approximate time each document was
used by the HCSD, how it was used, and who used it.

25 Interrogatory Number 23: Are you aware of any incidents where your signature has been forged on
26 any document purportedly relating to the HCSD, or any contract arising from your position as
27 Director of the HCSD? If your answer is yes, list and describe each document in as much detail as
possible, and give the time and circumstances that each document was used so far as you know.

28 Interrogatory Number 24: For the period of April 1, 2014 through and including September 30, 2014
list and describe each resolution, motion, contract, or other document used by you at any HCSD

1 Board meeting, or in any other proceeding (excluding any legal proceeding) involving the HCSD or
2 your office as President thereof, which was drafted in whole or in part by Robert Winston.

3 Interrogatory Number 25: Are you aware of any legal action(s) where Robert Winston has
4 interjected himself as purportedly representing the HCSD and/or one of its agents or employees in
5 their official capacity, but for which Winston did not have the approval of the HCSD Board to do so?
6 If your answer is yeas, please give the case number and title of each such case that you are aware of.

7 Interrogatory Number 26: Are you aware of any legal action(s) where Robert Winston has billed or
8 charged the HCSD for legal services, but for which Winston did not have the approval of the HCSD
9 Board to do so? If your answer is yes, please give the case number and title of each such case that
10 you are aware of.

11 Interrogatory Number 27: Are you aware of occasions where any member of the Board of the
12 HCSD, via the use of email, writing, telephone, or any other means of communication, engaged in
13 serial, or "spoke and wheel" with attorney Robert Winston outside of regular and special meetings of
14 the Board (including properly closed sessions)? If your answer is yes, please provide as many details
15 as you can about each such contact, event, and/or meeting.

16 Interrogatory Number 28: During June of 2014, while you were the Vice-President of the Board of
17 the HCSD, did you ever vote to rescind any voter-approval requirements as found in the Bylaws of
18 the HCSD, as adopted on April 18, 2014?

19 Interrogatory Number 29: During June of 2014, is it true that the existing Bylaws of the HCSD
20 provided that officers were to be elected yearly, at the first meeting of December?

21 Interrogatory Number 30: During your time in office as a Director of the HCSD, did you know that
22 Government Code section 61043 controls the terms of office for Officers of the Board of the HCSD?

23 Interrogatory Number 31: During June of 2014, was there any method contained in the existing
24 Bylaws of the HCSD to remove an Officer from a position? If your answer is yes, please detail how
25 such a removal would be accomplished in conformance with any specific provision of the Bylaws.

26 Interrogatory Number 32: What were the circumstances of the first occasion that any Member of the
27 Board had any contact with Robert Winston?

28 Interrogatory Number 33: What were the circumstances of the first occasion that any action was
taken by the Board of the HCSD to retain Robert Winston?

Interrogatory Number 34: Was any action ever taken by the Board of the HCSD at a public meeting
to retain Robert Winston in this case? If your answer is yes, give the date, time, and location of the
meeting, as well as the resolution number associated with the appointment.

Dated this 6th day of September, 2017, at Ashland, OR.


Peter T. Harrell

9/6/17
Date

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October 10, 2017

Ms. Sharrel Barnes
P.O. Box 395
Hornbrook, CA 96044

Re: Harrell v. Hanson, Brown, Barnes - Special Interrogatories

Dear Sharrel:

Thank you for your note to tell me you needed more time to
provide responses to the Interrogatories.

However, today is the deadline to respond, so I had to do so
without your input. Otherwise, we would waive any objections
to the Interrogatories.

I told Mr. Harrell that your further responses would soon be
forthcoming. So, I still need you to send yours to me as soon
as possible.

A party's failure to respond adequately to Interrogatories can
result in sanctions (punishment) being imposed by the court.
That can include fines and possibly result in the party's court
filings being nullified and a dismissal or default judgment
being entered.

Sincerely,



Robert D. Winston

RDW/

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Sincerely,



Robert D. Winston

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October 20, 2017

Ms. Sharrel Barnes
P.O. Box 395
Hornbrook, CA 96044

Re: Re: Harrell v. Hanson, Brown, Barnes - Special
Interrogatories

Dear Sharrel:

I wrote to you on October 10th (copy enclosed), but have not
yet received a response from you.

Please understand that you need to provide me with your answers
so that I can put them into proper form and send them to
Harrell.

If you are not sure of the answer to an Interrogatory, you can
state that you have insufficient information to be able to
answer it.

if you fail to provide Answers to these Interrogatories, the
judge could strike (cancel) your previous filings and Harrell
could be allowed a Judgment against you. If that happens, the
District might not be obligated to indemnify you. So, it is
important that you comply with your legal obligation here.

Please let me hear from you immediately.

Sincerely,



Robert D. Winston

RDW/

January 1, 2018

Robert Winston
Attorney at Law
P.O. Box 177
Mt. Shasta, CA 96067

copy

Mr. Winston,

Here are the answers to the questions by Peter that you sent to me. I noticed that there is no number four on the questions. I am sorry for the delay, but I have had some health issues, and the holidays also took up some of my time. I tried to answer everything as well as I could, but I haven't been able to find all of my papers, and haven't had time to get the emails printed out, so I will send those later if you think I need to do that. I am keeping a separate extra signed original copy of these papers in case they get misplaced. I know you said you would have to retype them and put them into the right form for the court, and then send them to me again to be signed so I will keep a look out for them in the mail. Let me know if I need to do anything else.

I also heard that there was a settlement for this case talked about at the last board meeting, and that there were settlement talks made months ago too. I would like to know what all of those were, and why you did not tell me about them.

LSJ

Sharrel M. Barnes
P.O. Box 395
Hornbrook, CA 96044 475-3725

1: I do not remember exact dates that I spoke with Patricia Brown (we call her Patty), but we spoke on the phone numerous times about what the board should be doing, and how she and Michele Hanson were violating the Brown Act, our bylaws, and the policies and procedures – especially about how warrant requests and other things were being handled. She basically said the same things to me that Michele did about how the board (meaning Michele) should be able to run things however they wanted, and not the general manager. She also said that we could have meetings with non-board people like Barry Sutter, or lawyers without having to post any agenda, or give notice to Kimberly and Roger about the meetings. There was also a lot of talk about how Julie Bowles was screwing up the bills for almost everybody all the time. Most of the conversations I had by phone were with Michele, but patty was usually there too, and Patty just went along with everything Michele said or did.

2: I don't remember the details of emails I exchanged with Patty, other than to say there were several about my complaints of not being kept in the loop as to actions she and Michele were taking concerning the district and board business, but I still have them in my email account, so it would be easier just to print them out and give those instead.

3: Patty and Michele stopped me while I was driving down the road one day and asked me to come to Michele's house, where they told me I needed to get on the board to help them eliminate the bylaws (that they voted for), and to get rid of Kimberly Olson and Peter Harrell. I saw Patty over at Michele's house several times after that. Each time her and Michele would talk about district business, and what they wanted to do about Peter, or who needed to get a break on their water bill or past due bills. Sometimes Kimberly was at Michele's house as well, because they were both required by the bylaws to do certain things jointly, but then Patty would show up and Michele and Patty would start to harp on Kimberly about what they wanted her to do as a board member, and about Peter making everybody pay their water bills and follow the laws – which they did not like. I told both Patty and Michele that what they were doing at those times violated the Brown Act. I think the only other contacts I had with Patty were at the meetings of the board I attended, but she didn't say much at those, and mostly just did whatever Michele told her to do.

5: I can't remember the exact dates, but I talked to Michele several times when she wanted me to get back on the board. She mostly talked about how the general manager shouldn't be doing anything, and that the board should be in control of everything instead. Also see my other answers about Patty.

each account was charged. I also know that she and Julie erased a lot of water charges, late charges, extra fees, and past due money from lots of different accounts without any board action. I asked Julie and Michele both for account information several times, but they refused to show any of it to me, and Julie wouldn't do anything I asked her to do otherwise, either. I also found out that Michele kept some of the deposit money people had paid to the HCSD.

11: There were lots of times that I was around Michele or Patty, or both, and they talked about how much they didn't like Peter going around and making people pay their water bills, turning off the water to people who didn't pay, doing inspections on customers who had extra connections to the meters, and stuff like that, and so upsetting the whole town. Mostly because everyone who thought they could get out of paying was calling Michele all the time and driving her crazy. As far as I know, Peter never did anything wrong, and we never got any written complaints other than from the people who live near the water plant when he sprayed the blackberries along the access road to the well – the same way the district has been doing for many years. I do know that Michele lied about Peter cutting locks on the gates to the wells because he had all the keys. She also lied about him taking the district's laptop because I saw it at her house, and much later she told me she still had it. She also lied to me and to the public about Kimberly closing the district's accounts and embezzling the money, when what really happened was the bank asked Kimberly (as the Secretary of the Board) to come to the bank and pick up cashier's checks made out to the HCSD because the accounts were being closed. Under the bylaws, Michele was supposed to get with Kimberly and open a new account, but instead she lied to the police, to me, to the Siskiyou County Treasurer's office, and to the public about what Kimberly did because she wanted to get Kimberly into trouble.

12: There was never any agenda item or any action taken while I was on the board to remove Peter as the acting general manager, but we did eliminate the position of general manager trainee. I don't have access to any of the records, so I don't remember what the resolution number was, but I think it was at the meeting of June 18. I do remember Michele saying she wanted to make sure that Peter would never do anything for the district, and that she could run the water plant all by herself if she had to. I also found out that Michele and Patty wrote a letter dated June 20 talking about how Peter was supposedly kicked out of his positions, but they did that without any approval by the full board for doing that, or telling them to write the letter in the first place, so it was illegal.

13: At the time we were supposed to appoint a general manager, Michele said that she would never hire Peter to do anything for the district because of this lawsuit, and what she said was his suing the entire town.

14: Yes, I saw one four-drawer, and two two-drawer filing cabinets full of papers, and a laptop. I also believe that she had a copy machine on top of one of the cabinets.

15: There were a lot of meetings at Michele's home, by emails, and by talking over the phone to each member of the board - except for Kimberly and Roger. Most of it was about how to get rid of Peter and Kimberly, and about how Michele wanted to run the district herself with Patty as her yes-person. She also complained a lot about the lawsuits, and how she and Mr. Winston were going to get a lot of judgments for attorney fees against Peter and Kimberly to run them out of town. Many times Michele got papers from Mr. Winston by email or in letters about HCSD board business that she then tried to get Patty and me to sign onto. She also showed up at meetings with a lot of papers that she said I needed to sign, but that she never gave me, or even let me see.

16: I know that lots of things that Michele and Patty did violated the Brown Act, and our own bylaws, and policies and procedures of the district. I found out later that they forged my signature on several documents, and changed documents that we supposedly voted on at board meetings without my knowledge. I also believe that Michele and Mr. Winston forged my signature on some legal service agreements and other legal papers, and that Michele inserted false dates next to some copies of my signature or signatures on some papers. Michele lied about Kimberly embezzling district money, and filed a false lawsuit against her and Peter. Michele and Patty did things that should have been done by the entire board, not just them, like hiring lawyers, giving breaks to some people on the water bills, and writing off past due bills. I also know that Michele and Mr. Winston created a formal response to the complaint Peter filed with the Labor Board without having a meeting of our board to approve it, and that response stated that Peter was a felon when he isn't. Michele took her family up to the water plant to cut down a tree on district property without any permission for her to do that being given by the board. While she was there doing that, she and some of her family attacked Roger Gifford. On September 9, I was contacted by the Siskiyou County Auditor's Office asking me to come in to see them. When I did, I found out that there was a forged signature from a copy machine on a transfer form for \$20,000 that had been brought in by Patty, but was also signed by Michele.

17: Yes. Michele and Patty both stated at least a couple of times at board meetings that they didn't want to have Peter work for the district because he filed lawsuits against them, and because he wanted everybody to follow all the rules all the time. Michele also lied to the court about Peter supposedly cutting locks when he never did, and lied to the Labor Board about Peter being a felon when he was not.

18: No. There was never any such item put on the agenda. I was not even told about that letter when they wrote it, and only found out about it long afterwards. She also was never authorized by the board to file the response to the Labor board, or to sign documents for court cases, but she did anyway.

19: No. We had a clients meeting at Mr. Winston's office in Yreka on that day, but Roger Gifford was kicked out by Mr. Winston, and we never took any action as the board of the district, and did not vote to hire Mr. Winston to bring the lawsuit against Peter or Kimberly.

20: No. See the answer to #19.

21: No. Mr. Winston has never been hired as general counsel for the district.

22: Mr. Winton created a large number of documents for use by Michele Hanson, but not the board as a whole. Those included different versions of bylaws, resolutions, letters, contracts, the response to the Labor Board and things like that, but usually Michele said that she had written them even when it was obvious by looking at the font and reading the way it was written that her saying so was a lie. Michele used those documents to falsify the district records, to try and get around the bylaws and policies and procedures of the district, to stop the residents of the district from voting on the things they were allowed to under the bylaws, and to put false documents into the court.

23: Yes. The documents I know about are warrants to the county auditor, a \$20,000 transfer form to the auditor, legal services agreements, resolutions and motions. There were also official district documents Michele and Mr. Winston made that I was supposed to sign off on, but either never got a chance to vote on them, or that were hidden from me because I didn't agree with them, so Michele went ahead and signed them by herself. Michele had custody of all of those documents, and used them at some meetings of the board, and in court.

24: I was the Vice-President, and not ever the President. But I never used any documents drafted for me by Mr. Winston at any meetings, because he never gave me any documents, he only gave them to Michele.

25: I am aware of several cases that Mr. Winston started acting in without any board permission being given to him to do so. This case is one of them, but he was never approved for any appeals at all, and we never approved him acting as Ernie Goff's lawyer in any cases. He was also not authorized by any board action to file the lawsuit against Kimberly or Peter, but I know that he and Michele made up some false minutes, declarations, and other records to try and say that he was. I don't remember the exact titles and case numbers of the other cases, but some involved Kimberly Olson, and others Roger Gifford. I know that Mr. Winston has continued to take over cases without board action being taken just on the say-so of Pat Slote and Bob Puckett.

26: Yes. See my answer to #25.

27: Michele did that all of the time. Mr. Winston never even came to a board meeting while I was on the board, and did everything with Michele over the phone or through email. Michele would afterwards tell Patty and me what he told Michele to do or say, and that we needed to follow his orders. The emails I got from Mr. Winston were mostly threats about not voting to pay him for new cases that he took over, but that he was never appointed to.

28: No I did not. There was never any agenda item or meeting of the board talking about rescinding voter approval requirements.

29: Yes, except if something were to happen to one of the officers, in which case we would appoint a new one. There's no provision in the bylaws or any other laws for the board to vote to remove one of its members from any office except for not paying their water bills, or taking off and not showing up for meetings for several months.

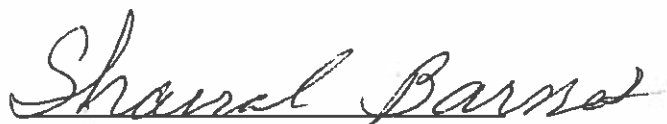
30: After Michele lied to me about Kimberly embezzling money from the district bank accounts, I found out that Michele also tried to add wording to a resolution that was never on the agenda or discussed at the board meetings about getting Kimberly out of her office. I found out that the law says we can't hold elections for officers more than once per year, and Kimberly's term was not up when Michele did that. Michele said at one of our board meetings in June of 2014 that we had to reappoint officers, but she didn't say why.

31: No. None of the Bylaws the district has ever had that I am aware of, and none of the policies and procedures, allows the board to just vote to kick somebody out of their position. A board member can be removed for failing to pay their water bills or for not showing up to meetings for several months without a valid excuse.

32: Michele and Patty met with Mr. Winston to hire him to be their lawyer for the lawsuits filed by Kimberly and Peter in June of 2014. After they hired him on their own, Winston told them to have the board hire him after that so that the district would have to pay for all the legal fees.

33: The board hired Mr. Winston to defend the board members in Kimberly's case #672. We did not hire him to defend Julie Bowles for that suit, though.

34: No there was not.


Sharrel M. Barnes

1-2-18

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LAW CORPORATION**

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U.S. Magistrate Judge, Retired

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DISCUSSED, DISCLOSED, OR PRODUCED TO ANY OTHER PERSONS.

January 26, 2018

Ms. Sharrel Barnes
P.O. Box 395
Hornbrook, CA 96044

Re: Re: Harrell v. Hanson, Brown, Barnes - Settlement

Dear Sharrel:

The District's Board of Directors met yesterday and tentatively
agreed to settle this case on the following terms:

1. Harrell is to dismiss case number 14-672 with prejudice and
release the defendants and the District from liability under
any of the causes of action alleged therein.
2. The District will release its \$2,295.00 judgment lien
against Kimberly Olson in case number 14-672, and the
defendants will release Harrell from any liability for having
filed case number 14-671.

The settlement is conditioned upon approval by the parties of a
formal written settlement agreement.

Please let me know whether these terms are acceptable to you.
However, be advised that if you do object, and refuse to sign
the necessary papers, the District can terminate its
representation of you in the action.

Sincerely,



Robert D. Winston

RDW/

February 4, 2018

Robert Winston
P.O. Box 177
Mt. Shasta, CA 96067

Copy

Re: Letter of January 26

Mr. Winston,

I am replying to your letter of January 26 to let you know that I don't have an objection to settling the case on the terms you stated. I think there has been too much money wasted on these cases already, and I know there was a judgment against the district from the appeal in 671 that you lost. I will sign papers that need to be signed for the settlement, but I think I have a right to be informed about any settlement when you first find out about it, and a right to come to any settlement meetings, but you kept me out of the loop on both of those until now.

I do have an objection to you constantly threatening me in every letter that you send me. The last time you threatened me was about the questions that I did my best to get to you when I could between eye surgery and other problems, and now you have had them for over a month and not sent them back for me to sign like you promised.

I think you are trying to set me up for the penalties and fines that you threatened me about, so if you do not get them put into the form you talked about and then back to me right away so I can sign them and make a copy, I am going to write a letter to the judge in Yreka and explain what you did, and turn them over to the state bar too. The state bar has already told me that if you try and take any action against me in a case, I can get you kicked off of it, and you don't get to remove me as a client from a case without my permission because it is a conflict of interest.

Sincerely,

/S/

Sharrel M. Barnes
P.O. Box 395
Hornbrook, CA 96044

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February 13, 2018

Ms. Sharrel Barnes
P.O. Box 395
Hornbrook, CA 96044

Re: Re: Harrell v. Hanson, Brown, Barnes (#14-671)
- Discovery

Dear Sharrel:

I am pleased to see that your eyesight has returned and that you are apparently feeling better.

I thought we would be able to settle this case with Harrell, but he is now demanding that we complete the pending discovery before dismissing the case. Of course, that makes no sense - there is no point in exchanging in discovery in a case that will soon be dismissed.

So, unless Harrell starts acting reasonably and like an adult, we must assume there will be no settlement and discovery must proceed.

I have reviewed your proposed Answer to Special Interrogatories, and thank you for those. However, there are some problems with them.

One problem is that they are not always responsive - they often include information which was not requested and they are often vague and ambiguous.

Another problem is that some of your Answers seem to implicate the other defendants by implying that they violated the Brown Act. Of course, two board members cannot, by themselves, violate the Brown Act by discussing district business outside a meeting; it takes a third, and that would have to be yourself, since Michele and Patty would not have been speaking with Roger or Kim. I doubt that you intended that result.

S. Barnes / 2-13-18 / P.2
Re: HCSD #671

You also imply that someone forged your name to at least one document. Even though you might not specifically recall signing everything that bears your signature from three years ago (no one could possibly do so), and it is alright to so state, it is inappropriate to attribute criminal behavior on the part of someone else unless you have actual grounds to do so.

In a number of instances, your draft Answers expressed your opinions and beliefs where the interrogatory asked whether you "were aware" of something. Being "aware" implies that one has first-hand personal knowledge of something, which you do not appear to have in those cases. For example, there is no way you could possibly know whether I "created" a document, even if I sent it directly to you. For all you know, I could be sending someone else's work product. One must be accurate when signing a statement under oath. I do not want you to be charged with perjury because you gave an response that you believed, but did not actually know to be a fact.

So, I have taken the liberty of editing your Answers so as to correct these problems. The result is attached. If it is acceptable, please sign it and return it to me.

Sincerely,

A handwritten signature in black ink, appearing to read "RDW", written over a vertical line.

Robert D. Winston

RDW/

No. 1: I do not recall the dates, times, or subject of any such telephone calls with Patricia Brown, except to say that we spoke a number of times about various topics.

No. 2: I do not recall the dates, times, nature of any such emails with Patricia Brown.

No. 3: I do not recall the dates, times, subject, or nature of any contacts with Patricia Brown, except to say that we conversed on a number of occasions on various topics.

[There is no Number 4.]

No. 5: I do not recall the dates, times, or subject of any such telephone calls with Michele Hanson, except to say that we spoke a number of times about various topics.

No. 6: I do not recall the dates, times, nature of any such emails with Michele Hanson.

No. 7: I do not recall the dates, times, subject, or nature of any contacts with Michele Hanson, except to say that we conversed on a number of occasions on various topics.

No. 8: I do not recall doing so.

No. 9: I do not recall doing so.

No. 10: I do not recall any such accounts.

No. 11: I do not recall dates, times, or locations of any specific meetings. There were a number of occasions when the performance of Mr. Harrell were discussed.

No. 12: I do not recall any such action.

No. 13: I do not recall taking such action, nor the reason(s) I might have had to do so.

No. 14: Yes, I recall seeing a two-drawer filing cabinet full of papers and a laptop computer which I believe belonged to the District.

No. 15: Objection, calls for a legal conclusion. I do not recall the dates, times, locations, or attendees for any specific meetings, but believe such violations may have occurred.

No. 16: Objection, calls for a legal conclusion, which I am not qualified to give. I do not recall the dates, times, locations, or names of any such persons, but believe such violations may have occurred.

No. 17: Objection: calls for a legal conclusion. I do not know what motives are considered "proper".

No. 18: I do not recall such an item being before the Board.

No. 19: Except as stated in my Answer to Interrogatory No. 33, I do not recall such an item being before the Board.

No. 20: Except as stated in my Answer to Interrogatory No. 33, I do not recall such an item being before the Board.

No. 21: To my knowledge Mr. Winston was never so retained.

No. 22: I have no personal knowledge as to whether Mr. Winston or some other person created documents.

No. 23: I have no personal knowledge of any such forgeries.

No. 24: I have never served as District Board President.

No. 25: Except as stated in my Answer to Interrogatory No. 33, I am not aware that Mr. Winston was ever authorized by the Board to represent the District in any legal actions.

No. 26: Except as stated in my Answer to Interrogatory No. 33, I am not aware that Mr. Winston was ever authorized to charge the District for legal services.

No. 27: I have no personal knowledge of any such occasions, but I believe they occurred.

No. 28: I do not recall such an item being before the Board.

No. 29: That is my best recollection.

No. 30: Objection: calls for a legal conclusion which I am not qualified to provide.

No. 31: I am not aware of any such provision.

No. 32: I have no personal knowledge of any such contact.

No. 33: The Board engaged Mr. Winston to defend the Board members in case number 14-672.

No. 34: I am not aware of any such action.

I declare under penalty of perjury under the laws of the State of California that the foregoing are true and correct to the best of my knowledge and that this statement was made on the date stated below.

Dated: _____

Sharrel Barnes

Please
Sign
Return