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**RECEIVED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE

FEB 24 2022

DAVID H. YAMASAKI, Clerk of the Court

BY: KFEINAUER, DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ORANGE, HARBOR JUSTICE CENTER

PEOPLE OF THE STATE OF CALIFORNIA

v.

JAMON RAYON BUGGS

*Defendant.*

Case No. 19HF0550

NOTICE AND DISCLOSURE OF  
FRAUD PERPETRATED ON THE  
COURT (BUSINESS AND  
PROFESSIONS CODE SECTION  
6068(d)).

*Submitted pursuant to People v. Reil  
(2000) 22 Cal.4th 1153*

Date: February 24, 2022  
Dept. H2

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I.

INTRODUCTION

I am an attorney licensed to practice law in the State of California. In this capacity, and in preparation for potential litigation against the County of Orange on behalf of another member of the California State Bar, I have come into possession of emails which reveal what I believe to be a fraud recently perpetrated upon this Court. As will be discussed below, I believe that this material must be disclosed.

II.

DISCLOSURE

District Attorney Todd Spitzer has recently come under intense public criticism for racially biased comments he made during a staff meeting regarding the above-captioned case. As this Court is well aware, the purpose of this meeting was to determine whether to seek the death penalty against Mr. Buggs, who is African American. Unfortunately, Mr. Spitzer's misconduct in connection with the *People v. Buggs* is not limited to these racially biased comments.

I respectfully submit that the attached emails irrefutably establish that Mr. Spitzer also lied in his ex parte memorandum submitted to the court in this matter on Feb. 4, 2022. Clearly, Mr. Spitzer's memorandum was presented in an attempt to persuade the court to keep his racist remarks hidden from Mr. Buggs' defense lawyers, as well as from the public at large. I believe that the submission of such a false writing to the court violates an attorney's statutory and ethical duty "never to seek to mislead the judge" through the use of "any false statement of fact or law." (Bus. & Prof. Code, § 6068, subd. (d)).

1 An attorney who becomes aware of Mr. Spitzer's attempted fraud on the court,  
2 therefore, has a professional obligation to bring the true facts to the court's attention,  
3 consistent with that lawyer's "special duty . . . to prevent and disclose frauds upon the  
4 court." (*People v. Riel* (2000) 22 Cal.4th 1153, 1217, quoting *Nix v. Whiteside* (1986)  
5 475 U.S. 157, 168-169.)

6 Mr. Spitzer's deception is set forth in a four-page memorandum, misleadingly  
7 addressed to the "Buggs File," which he caused to be submitted to the court provisionally  
8 under seal, along with a motion requesting that his own memo and, more importantly, Mr.  
9 Baytieh's explosive memo (which details the racially biased statements made by Spitzer),  
10 be deemed "attorney work product" and, therefore, confidential and not subject to  
11 disclosure to the defense. At the outset, Mr. Spitzer's memo was not intended merely to  
12 memorialize Mr. Spitzer's version of facts for the prosecution's file. Indeed, by that time  
13 the file was presumably in the possession of the newly-assigned prosecutor (Senior  
14 Deputy DA David Porter), and Spitzer had supposedly created a "wall" intended to  
15 prevent Mr. Porter from learning of the facts discussed in that memo.

16 It should be noted that Mr. Spitzer wrote his memo to the "Buggs file" on January  
17 30. Two days earlier, Sr. Deputy DA David Porter wrote a letter to the Buggs defense,  
18 stating that the OCDA would "no longer be pursuing the death penalty." This raises a  
19 problem. Mr. Spitzer told the court that "The case has been assigned to a new homicide  
20 prosecutor. . . That prosecutor has no knowledge or information about these proceedings  
21 involving the Special Circumstances Committee." (Spitzer memo at page 4). What we  
22 have here, then, is a head-scratching conundrum -- it would appear that either Mr. Spitzer  
23 was attempting to mislead the court by labeling his memo "To the Buggs File," or else he  
24 never intended Mr. Porter to be unaware of the facts about the Special Circumstances  
25 Committee contained in the Spitzer memo, since Mr. Porter would be presumably reading  
26 the material contained in the file he had been newly assigned.

27 Rather than being a mere memo to the file, the document is obviously a vehicle for  
28 Mr. Spitzer to offer numerous factual arguments to the court -- on an ex parte basis --  
seeking to support his "belief that both memos [Mr. Spitzer's and Mr. Baytieh's] are work

1 product,” and arguing that they should remain hidden from the defense because “the  
2 remedies implemented by me have cured any issues.” That Mr. Spitzer’s intended  
3 audience is the court is made clear in the final paragraph, where he addresses the court  
4 directly, stating: “it is critical that I submit his [sic] to this honorable court for a ruling on  
5 discovery in light of . . . the actions on the case that have already been implemented.” In  
6 light of the attached internal emails, it is evident that the arguments in Mr. Spitzer’s memo  
7 are specious, and that he has made numerous materially false representations to the court.  
8 Those false statements include the following:

9  
10 **1. The timing of when Mr. Spitzer learned that others within his office viewed  
11 his racial comments as improper.**

12 In the opening paragraph of his memorandum to the court, Mr. Spitzer states: “On  
13 or about December 22, 2021, I was made aware for the first time” that Mr. Baytieh had  
14 “constructed a memo purporting to characterize” Spitzer’s comments concerning the race  
15 of Mr. Buggs’ prior girlfriends, made during the October 1, 2021 Special Circumstance  
16 committee meeting. Mr. Spitzer then states that in the “nearly 90 days [that] had passed,  
17 *not one person of the Special Circumstances committee . . . in any way beforehand*  
18 *communicated any potential issues* with my statements . . .” (Spitzer memo, at p. 1  
19 [emphasis added].) Spitzer repeats the same point on page 3 of his memo, emphasizing  
20 again that Mr. Baytieh “did not bring *any issues* subsequent to the [October 1] Special  
21 Circs meeting to my attention before he wrote his December 22, 2021 memo.” (*Ibid.*)

22 Mr. Spitzer sought to support this narrative (which he called a “literally mind  
23 blowing” surprise by Mr. Baytieh) by accusing Mr. Baytieh of deliberately “ag[ing]” his  
24 concerns to “make it difficult for anyone else to challenge his recollection.” Mr. Spitzer’s  
25 clear intent was to persuade the court that the matter should remain sealed because his  
26 comments were so innocuous as to not become a subject of controversy until Mr. Baytieh  
27 allegedly tried to make them so three months later.  
28

1           But the attached internal emails (which notably have not been disclosed to the  
2 court by Mr. Spitzer) prove that the “potential issues” with Mr. Spitzer’s racially biased  
3 remarks were communicated to him much earlier than he told the court. On October 28,  
4 2021 at 8:48 a.m., Mr. Baytieh sent Mr. Spitzer an email concerning the *Buggs* case,  
5 telling Spitzer that he was providing “for [Spitzer’s review] the language of AB 2542 [the  
6 Racial Justice Act]” and noting that it had been “signed into law **since we discussed it**”  
7 during an earlier Special Circumstances committee meeting.

8           The Racial Justice Act provides discovery obligations and legal remedies in the  
9 event a prosecutor exhibits racial bias toward a defendant. There would be no reason for  
10 Mr. Baytieh to mention the Racial Justice Act in his email if Mr. Spitzer was unaware that  
11 the racial comments he had expressed during the October 1 meeting of the Special  
12 Circumstances Committee had, in fact, caused great concern for one or more members of  
13 the committee. But even more directly, Mr. Baytieh’s email references a prior discussion  
14 involving himself and Mr. Spitzer concerning the Racial Justice Act as it pertained to the  
15 *Buggs* case. What’s more, Mr. Baytieh’s email goes on to say that he (Baytieh) “relied on  
16 [the Racial Justice Act] in making my recommendation [not to pursue the death penalty].”  
17 Here again, nothing else about Mr. Buggs’ case – other than Mr. Spitzer’s racially biased  
18 comments – would have explained Mr. Baytieh’s reliance on the Racial Justice Act as a  
19 basis to recommend that Mr. Spitzer not seek the death penalty. Mr. Spitzer’s unabashed  
20 attempt to perpetrate a fraud on the court—by claiming that no one who heard the racially  
21 biased comments on October 1 protested until December 22 (and thus, Mr. Spitzer argues,  
22 the racially biased statements must not have been made at all)—relied on the erroneous  
23 belief that nobody else maintained copies of this email exchange. Fortunately, he was  
24 mistaken.

25           But that’s not all. The attached emails reveal that Mr. Spitzer not only received  
26 Mr. Baytieh’s October 28 email, containing a copy of the Racial Justice Act, but that  
27 Spitzer immediately read it. And then, just 17 minutes later, at 9:05 a.m., **Spitzer replied**  
28 **to Baytieh, telling him that he (Spitzer) had “made the decision to seek DP [death**  
**penalty].”**

1  
2 The significance of that decision to seek the death penalty brings us to the second material  
3 misrepresentation that Spitzer made to the court.  
4

5 **2. Spitzer's effort to hide the fact that he initially decided to seek the Death**  
6 **Penalty against Mr. Buggs.**

7 In an effort to convince the court that the racial remarks he made on October 1  
8 should not be disclosed to Mr. Buggs' counsel, Mr. Spitzer argued that the remedies he  
9 put into place (including reassigning the matter to another prosecutor and "wall[ing] off"  
10 everyone who was present during the meeting, "including myself") were sufficient. And  
11 in an effort to further strengthen his contention that the controversy over his racially  
12 biased remarks had no impact on the case, Mr. Spitzer told the court: "The *only*  
13 subsequent decision that I made after October 1, 2021 was that I would be seeking LWOP  
14 in this matter and not death." (Spitzer memorandum, at p. 4, emphasis added.) This was  
15 yet another lie. As noted above, Spitzer announced to Mr. Baytieh in an October 28 email  
16 that Spitzer had "made the decision to seek DP."

17 The motive for Mr. Spitzer's lie is obvious: to try to convince the court that the  
18 racially-charged statements set forth in Baytieh's narrative were much ado about nothing,  
19 instead of what every experienced capital litigator can see that it represents -- a blunder of  
20 immense magnitude, and a shameful expression of racial bias in a setting of such  
21 solemnity and importance, that **Mr. Spitzer reversed his position on seeking the death**  
22 **penalty for the sole purpose of keeping the issue hidden from Mr. Buggs's defense**  
23 **team and the public.**

24 Not only did Mr. Spitzer reverse his decision, but he did so with such haste that his  
25 notification that LWOP would be sought was made by the new prosecutor immediately  
26 after he was assigned to the case. According to Newport Beach Police Department  
27 Lieutenant Depweg, neither his agency nor the victims' next-of-kin were notified first –  
28 one of the many bizarre circumstances that led him to report to Judge Prickett that he  
believed Mr. Spitzer was engaged in a "cover up" of his racially biased comments.

1 (Depweg memo, at p. 3.) Tellingly, in his January 28 letter to the court, Sr. DDA Porter  
2 phrased the formal announcement with the words “the Orange County District Attorney’s  
3 Office *is no longer pursuing the death penalty* against your client.” (Porter letter dated  
4 Jan. 28, 2022; emphasis added).<sup>1</sup>

5 Thus, there is unequivocal evidence that Mr. Spitzer had decided, prior to Mr.  
6 Baytieh writing his December 22 memo, that his office should seek the death penalty as  
7 the just punishment for the double murder charged in this case. This evidence leads to two  
8 inescapable conclusions:

9  
10 1) Mr. Spitzer lied to this court when he wrote that the only decision that he made  
11 after the October 1 meeting (at which the defense presented its mitigation case)  
12 was to seek LWOP. In fact, as he stated in his Oct. 28 email to Baytieh, Mr. Spitzer  
13 first decided to seek the death penalty, and only after Baytieh’s December 22  
14 memo was written, and it became evident to Spitzer that he couldn’t keep a lid on  
15 the evidence of his racially biased comments, did Spitzer decide to seek LWOP.<sup>2</sup>

16 2) Mr. Spitzer withheld from the court material evidence by not providing to the  
17 court, along with his January 30 memo, copies of the emails between himself and  
18 Mr. Baytieh. What’s more, as anyone who has ever served on the OCDA  
19 Homicide Unit knows well, there are specific forms used by the Special

20  
21 <sup>1</sup> In no way do I intend to cast aspersions on the integrity of David Porter or Susan Price, whom  
22 Mr. Spitzer has dragged into a controversy not of their own making.

23 <sup>2</sup> When considering the veracity of Mr. Spitzer’s statements to the court, it is also worth noting  
24 that Mr. Spitzer’s recent comments to the media also contradict his Oct. 28 email to Mr. Baytieh.  
25 For instance, in a Feb. 16, 2022 article by MyNews LA, Mr. Spitzer told a reporter that “he opted  
26 not [to] pursue the death penalty for Buggs because defense attorneys have said their client  
27 suffered chronic traumatic encephalopathy playing football in high school and college and was  
28 subjected to racist taunts going to predominantly white schools. ‘I did not believe we would be  
able to get death,’ Spitzer said. ‘The defense presented a whole series of defenses that I believe  
are compelling.’” My News LA, “Ex-Prosecutor Alleges Spitzer Raised Race as Issue in Death  
Penalty Case,” Feb. 16, 2022. See [https://mynews1a.com/crime/2022/02/16/ex-prosecutor-alleges-  
spitzer-raised-race-as-issue-in-death-penalty-case/](https://mynews1a.com/crime/2022/02/16/ex-prosecutor-alleges-spitzer-raised-race-as-issue-in-death-penalty-case/).

1 Circumstances Committee to record the recommendations made by the respective  
2 committee members regarding whether to seek the death penalty. The District  
3 Attorney and his Chief Deputy then formally weigh in by filling out a separate  
4 form, indicating whether they agree with the Committee's recommendation. It is  
5 by use of this form that the District Attorney, on whose shoulders the ultimate  
6 decision whether to seek the death penalty rests, records his final decision – either  
7 to accept or reject the decision of this Committee. The fact that Mr. Spitzer chose  
8 not to include, or even mention, the Special Circumstance Committee forms in his  
9 submission to this court on February 4 is a glaring, and we believe tell-tale,  
10 omission. We would invite the court to inquire why this was not done. We suspect  
11 the answer is manifest.

12 Of course, conveniently, the personnel within OCDA—other than Mr. Spitzer—  
13 who are most likely to be aware of the existence and relevance of these forms and other  
14 relevant documents are precisely those people whom Mr. Spitzer has “walled off” from  
15 having any further involvement with the case. And, ominously, with the firing of Mr.  
16 Baytieh, those individuals have all now seen exactly what happens when someone with  
17 integrity takes a principled stand against Mr. Spitzer. Which brings us to yet another  
18 materially false statement in Mr. Spitzer's submission to the court.

### 20 **3. Spitzer's nonexistent wall.**

21 The third deception set forth in Mr. Spitzer's memo is that he had “walled . . .  
22 [him]self,” as well as every other prosecutor who had heard Spitzer's racial comments, off  
23 the case. This was intended to convey the impression that he would no longer take any  
24 action that might affect the case. But as Lt. Depweg of the Newport Beach Police Dept.  
25 makes clear in his letter to the court dated February 3, 2022, Mr. Spitzer had no intention  
26 of ending his involvement. As the head of the homicide unit reportedly told the lieutenant  
27 in a text message on February 1, just two days after Mr. Spitzer drafted the memo to  
28 Judge Prickett: “Todd indicated [that he's] fine [if] Chief Lewis wants to contact him



1 about Buggs.” (Depweg letter, at p. 2). On February 17, Mr. Spitzer confirmed this fact,  
2 telling a reporter, “When my head of homicide expressed to me that Newport Beach  
3 police had questions about the status of the case and asked if I would take a phone call, I  
4 said [they] could call me anytime,” Spitzer said.”<sup>3</sup>

#### 5 6 **4. Spitzer’s Ever-Changing Position Concerning the Content and Nature of** 7 **His Comments**

8 In his memo to the court, Mr. Spitzer insists that there was nothing improper about the  
9 racially-themed statements he made during the October 1 meeting of the Special  
10 Circumstances Committee. Mr. Spitzer told the court:

- 11 • “My questions about Buggs and what the race of former girlfriends was simply to  
12 address the issue of cross racial identification.” (Spitzer memo, page 2).
- 13 • “These issues of race and religion may seem taboo, but they are as real today as  
14 they have always been in society.” (Spitzer memo, page 3).
- 15 • “It is literally absurd to believe and such an overreach in interpretation to believe in  
16 any way whatsoever that such an inquiry was not asked with innocent inquiry [sic]  
17 to explore the issue of cross racial identification as to the murder of the female  
18 victim.” (Spitzer memo, page 3).

18 However, after watching an outpouring of public outrage since the revelation of his  
19 October 1 racially-charged statements,<sup>4</sup> it seems that Mr. Spitzer decided he needed to  
20 change his tune. In a February 21 interview with the Orange County Register, Mr. Spitzer  
21 began to backtrack, admitting that his statements during the committee meeting were

22 <sup>3</sup> BuzzFeed News, “A Police Officer Accused a Prosecutor Of Covering Up a ‘Racist’ Comment  
23 About a Black Murder Suspect Who Dated a White Woman,” by Salvador Hernandez, February  
24 17, 2022. See <https://www.buzzfeednews.com/article/salvadorhernandez/spitzer-racist-orange-county-newport-police>.

25 <sup>4</sup> “The comments caused a furor in the Orange County legal community, were condemned by the  
26 California and Hawaii chapter of the NAACP and prompted a Spitzer challenger in the June 7  
27 primary for the district attorney’s seat to call for his resignation.” Orange County Register, “2  
28 Black Leaders Back DA Todd Spitzer Following Alleged Racially Charged Remarks,” by Sean  
Emery, et al., February 21, 2022. See <https://www.ocregister.com/2022/02/21/2-black-leaders-back-da-todd-spitzer-following-alleged-racially-charged-remarks/>.

1 “insensitive” and “inartful.”<sup>5</sup> While a person is certainly allowed to change their appraisal  
2 of their own conduct or statements, this flip-flop smacks far less of personal growth than  
3 of ditching a failed political strategy. The latter explanation appears even more likely in  
4 light of Mr. Spitzer’s most recent public statements in which he doubled down on the  
5 strategy to vilify Mr. Baytieh; on February 23, Mr. Spitzer released a statement calling  
6 Mr. Baytieh’s memo “false” and an effort to “extort” Mr. Spitzer.<sup>6</sup> At any rate, it is  
7 beyond dispute that Mr. Spitzer’s Feb. 21 statements are a far cry from the position he  
8 staked out in his January 30 memo wherein Spitzer relentlessly (even obsessively) attacks  
9 the veracity of Mr. Baytieh--a man of renowned integrity who has earned an impeccable  
10 reputation for honesty and fair dealing.<sup>7</sup>

11 Furthermore, while it has become commonplace to see elected politicians changing a  
12 story in the name of political convenience, it is another thing entirely for a member of the  
13 State Bar to contradict himself about a material issue concerning which he has made  
14 factual representations to a court. Such fundamental inconsistencies are all the more  
15 outrageous in special circumstance murder cases involving particularly brutal facts.

### 16 III. 17 CONCLUSION

18  
19 In all of this, we respectfully submit that Mr. Spitzer has disgraced himself, betrayed  
20 the victims, the justice system, and the community at large, and further sullied the esteem  
21 of the office he was elected to lead.

22  
23  
24 

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<sup>5</sup>*Ibid.*

25 <sup>6</sup> See “High Ranking OC Prosecutor Quits...”, Voice of OC, Feb. 23, 2022 at  
26 <https://voiceofoc.org/2022/02/high-ranking-oc-prosecutor-quits-says-da-spitzer-jeopardized-mass-shooting-prosecution/>.

27 <sup>7</sup> Of course, this implicates yet a fifth material falsehood in Mr. Spitzer’s memo – namely, the  
28 nature of Mr. Baytieh’s conduct which led to his firing by Mr. Spitzer. But that scandal is already  
a matter of public record, and there will be another forum and another time to prove that Mr.  
Spitzer’s stated reasons for the firing were pretextual.

1 In short, Mr. Spitzer has attempted to perpetrate a fraud on this court, and we had a  
2 clear ethical duty to provide the attached documents.

3  
4 Respectfully submitted,  
5 Dated: February 24, 2022

MATT MURPHY LAW APC

6  
7  
8 By:



9  
10 \_\_\_\_\_  
11 Matthew Murphy

# ATTACHMENT

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**From:** Baytieh, Ebrahim  
**Sent:** Monday, November 1, 2021 12:17 PM  
**To:** Scarborough, Eric <Eric.Scarborough@da.ocgov.com>; McGreevy, Steve <Steve.McGreevy@da.ocgov.com>  
**Subject:** FW: People v Buggs 19HF0550

Todd agrees with the recommendation to wait until after the 1368 issue is resolved before announcing his decision re seeking DP. Please let me know when there are any developments re the 1368 issue.

Take Care.

Brahim

**EBRAHIM BAYTIEH**  
Orange County District Attorney's Office  
Senior Assistant District Attorney – Operations IV  
714-347-8404  
[ebrahim.baytieh@da.ocgov.com](mailto:ebrahim.baytieh@da.ocgov.com)

---

**From:** Baytieh, Ebrahim  
**Sent:** Thursday, October 28, 2021 2:19 PM  
**To:** Spitzer, Todd <Todd.Spitzer@da.ocgov.com>; Nelson, Shawn <Shawn.Nelson@da.ocgov.com>  
**Cc:** Jayasekera, Narah <Narah.Jayasekera@da.ocgov.com>  
**Subject:** RE: People v Buggs 19HF0550

Eric's recommendation is that we should wait until the 1368 issue is resolved before announcing the DP decision. Eric is of the opinion that Judge Prickett will be completely good with us not making the decision now because the 1368 matter came up after he asked us to try to make the decision by November 1. Steve and I completely agree with waiting until the 1368 matter is resolved.

Take Care.

Brahim

**EBRAHIM BAYTIEH**  
Orange County District Attorney's Office  
Senior Assistant District Attorney – Operations IV  
714-347-8404  
[ebrahim.baytieh@da.ocgov.com](mailto:ebrahim.baytieh@da.ocgov.com)

From: Spitzer, Todd <[Todd.Spitzer@da.ocgov.com](mailto:Todd.Spitzer@da.ocgov.com)>  
Sent: Thursday, October 28, 2021 9:05 AM  
To: Baytieh, Ebrahim <[Ebrahim.Baytieh@da.ocgov.com](mailto:Ebrahim.Baytieh@da.ocgov.com)>; Nelson, Shawn <[Shawn.Nelson@da.ocgov.com](mailto:Shawn.Nelson@da.ocgov.com)>  
Cc: Spitzer, Todd <[Todd.Spitzer@da.ocgov.com](mailto:Todd.Spitzer@da.ocgov.com)>; Jayasekera, Narah <[Narah.Jayasekera@da.ocgov.com](mailto:Narah.Jayasekera@da.ocgov.com)>  
Subject: RE: People v Buggs 19HF0550

What's Eric's recommendation given Judge Prickett asked to be notified by Nov 1 and I have made the decision to seek DP.  
Todd

Sent via the Samsung Galaxy S21 5G, an AT&T 5G smartphone

----- Original message -----

From: "Baytieh, Ebrahim" <[Ebrahim.Baytieh@da.ocgov.com](mailto:Ebrahim.Baytieh@da.ocgov.com)>  
Date: 10/28/21 8:48 AM (GMT-08:00)  
To: "Spitzer, Todd" <[Todd.Spitzer@da.ocgov.com](mailto:Todd.Spitzer@da.ocgov.com)>, "Nelson, Shawn" <[Shawn.Nelson@da.ocgov.com](mailto:Shawn.Nelson@da.ocgov.com)>  
Cc: "Jayasekera, Narah" <[Narah.Jayasekera@da.ocgov.com](mailto:Narah.Jayasekera@da.ocgov.com)>  
Subject: FW: People v Buggs 19HF0550

In connection with the Buggs case, please see the update below from Eric Scarbrough regarding the 1368 issue that came up in court in the last few days. As listed below, the court has now scheduled a hearing on November 10 to revisit the issue of 1368. I am also attaching to this e-mail for your review the language of AB 2542 which has now been signed into law since we discussed it during the SCC meeting and I relied on it in making my recommendation. Please let me know if you want Eric to notify the court and the defense of the DP decision now before the November 10 hearing on 1368, or if you want Eric to wait until after the November 10 hearing to make the notification. Previously, before the issue of 1368 was raised, the court had requested that we try to notify the court By Monday, November 1.

Narah, may I please ask you to print this e-mail and the attached document and send in the packet.

Take Care.

Brahim

**EBRAHIM BAYTIEH**  
Orange County District Attorney's Office  
Senior Assistant District Attorney – Operations IV  
714-347-8404  
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