

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF LOS ANGELES

The People of the State of California,
Plaintiff,

vs.

ALLENCO ENERGY INC.;

TIMOTHY JAMES PARKER;
(M: DOB: 01/28/57)

CLIFFORD E. PETER ALLEN;
(M: DOB 12/29/1932)

Defendants,

CA Pub. Rec. Code §3236.....1 Count
CA Pub. Rec. Code §3359.....1 Count
L.A.M.C. § 57.5706.3.16.1.....21 Counts
L.A.M.C. §57.706.3.7.1.....2 Counts

Arraignment Date: October 20, 2020

Case No.: 0CJ00630

MISDEMEANOR COMPLAINT

Filed by SHERRI R. CARTER,
Executive Officer/Clerk

Issued by

MICHAEL N. FEUER
City Attorney

By Mall Sep for Jessica Brown
JESSICA B. BROWN
Supervising Deputy City Attorney
ENVIRONMENTAL JUSTICE UNIT

Comes now the PEOPLE OF THE STATE OF CALIFORNIA, and upon such information and belief declares: That on or about January 21, 2020, through and including the date of filing of this Complaint, and ongoing beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor to wit:

1 a violation of **California Public Resource Code § 3236**

2
3 was committed by **ALLENCO ENERGY, INC.**

4 **TIMOTHY JAMES PARKER**

5 **CLIFFORD E. PETER ALLEN**

6
7 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
8 refuse to permit the supervisor or the district deputy, or his inspector, to inspect a well, or who
9 willfully hindered or delayed the enforcement of the provisions of this chapter, and every person,
10 whether as principal, agent, servant, employee, or otherwise, who did violate, fail, neglect, or refuse to
11 comply with any of the provisions of Chapter 1, of Division 3 of the Public Resource Code, or who
12 failed or neglected or refused to furnish any report or record which may be required pursuant to the
13 provisions Chapter 1, of Division 3 of the Public Resource Code, or who did willfully render a false or
14 fraudulent report to wit: **failure to comply with CalGEM Remedial Order No. 1162, affirmed on**
15 **January 21, 2020, at 814 W. 23rd Street, in the City of Los Angeles.**

16
17 **COUNT 2**

18 For a further, separate and second cause of action, being a different offense belonging to the
19 same class of crime and offense set forth in Count 1, affiant complains and says: That on or about
20 January 21, 2020, through and including the date of filing of this Complaint, and ongoing beyond,
21 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
22 Angeles, State of California, a misdemeanor to wit:

23
24 a violation of the **California Public Resources Code §3359**

25
26 was committed by **ALLENCO ENERGY, INC.**

27 **TIMOTHY JAMES PARKER**

28 **CLIFFORD E. PETER ALLEN**

1 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
2 fail or neglect to comply with any order of the supervisor or the director, or any subpoena, or upon did
3 refuse to testify to any matter regarding which he may lawfully be interrogated, or did refuse or neglect
4 to appear and attend at any proceeding or hearing on the day specified, after having received a written
5 notice of not less than 10 days prior to such proceeding or hearing, or did fail, refuse, or neglect to
6 produce books, papers, or documents as demanded in the order or subpoena, to wit: **failure to comply**
7 **with CalGEM Remedial Order No. 1162, affirmed on January 21, 2020, at 814 W. 23rd Street, in**
8 **the City of Los Angeles.**

10 **COUNT 3**

11 For a further, separate and third cause of action, being a different offense belonging to the same
12 class of crimes and offenses set forth in Counts 1-2, affiant complains and says: That on or about
13 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
14 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
15 Angeles, State of California, a misdemeanor to wit:

17 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

19 was committed by **ALLENCO ENERGY, INC.**
20 **TIMOTHY JAMES PARKER**
21 **CLIFFORD E. PETER ALLEN**

23 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
24 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
25 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
26 which states that any oil well which has not been secured in compliance with the provisions of Section
27 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
28 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice

1 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
2 **Number 2419, located at 814 W. 23rd Street, in the City of Los Angeles.**

3
4 **COUNT 4**

5 For a further, separate and fourth cause of action, being a different offense belonging to the
6 same class of crimes and offenses set forth in Counts 1-3, affiant complains and says: That on or about
7 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
8 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
9 Angeles, State of California, a misdemeanor to wit:

10
11 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

12
13 was committed by **ALLENCO ENERGY, INC.**
14 **TIMOTHY JAMES PARKER**
15 **CLIFFORD E. PETER ALLEN**
16

17 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
18 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
19 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
20 which states that any oil well which has not been secured in compliance with the provisions of Section
21 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
22 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
23 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
24 **Number 2506, located at 814 W. 23rd Street, in the City of Los Angeles.**
25

26 **COUNT 5**

27 For a further, separate and fifth cause of action, being a different offense belonging to the same
28 class of crimes and offenses set forth in Counts 1-4, affiant complains and says: That on or about

1 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
2 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
3 Angeles, State of California, a misdemeanor to wit:

4
5 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

6
7 was committed by ALLENCO ENERGY, INC.

8 TIMOTHY JAMES PARKER

9 CLIFFORD E. PETER ALLEN

10
11 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
12 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
13 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
14 which states that any oil well which has not been secured in compliance with the provisions of Section
15 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
16 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
17 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
18 **Number 2484, located at 814 W. 23rd Street, in the City of Los Angeles.**

19
20 **COUNT 6**

21 For a further, separate and sixth cause of action, being a different offense belonging to the same
22 class of crimes and offenses set forth in Counts 1-5, affiant complains and says: That on or about
23 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
24 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
25 Angeles, State of California, a misdemeanor to wit:

26
27 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1
28

1 was committed by ALLENCO ENERGY, INC.
2 TIMOTHY JAMES PARKER
3 CLIFFORD E. PETER ALLEN
4

5 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
6 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
7 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
8 which states that any oil well which has not been secured in compliance with the provisions of Section
9 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
10 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
11 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
12 **Number 2432, located at 814 W. 23rd Street, in the City of Los Angeles.**
13

14 **COUNT 7**

15 For a further, separate and seventh cause of action, being a different offense belonging to the
16 same class of crimes and offenses set forth in Counts 1-6, affiant complains and says: That on or about
17 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
18 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
19 Angeles, State of California, a misdemeanor to wit:

20
21 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**
22

23 was committed by ALLENCO ENERGY, INC.
24 TIMOTHY JAMES PARKER
25 CLIFFORD E. PETER ALLEN
26

27 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
28 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted

1 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
2 which states that any oil well which has not been secured in compliance with the provisions of Section
3 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
4 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
5 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
6 **Number 2470, located at 814 W. 23rd Street, in the City of Los Angeles.**

7
8 **COUNT 8**

9 For a further, separate and eighth cause of action, being a different offense belonging to the
10 same class of crimes and offenses set forth in Counts 1-7, affiant complains and says: That on or about
11 October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond,
12 daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los
13 Angeles, State of California, a misdemeanor to wit:

14
15 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

16
17 was committed by **ALLENCO ENERGY, INC.**

18 **TIMOTHY JAMES PARKER**

19 **CLIFFORD E. PETER ALLEN**

20
21 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
22 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
23 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
24 which states that any oil well which has not been secured in compliance with the provisions of Section
25 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
26 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
27 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
28 **Number 2446, located at 814 W. 23rd Street, in the City of Los Angeles.**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 9

For a further, separate and ninth cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-8, affiant complains and says: That on or about October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor to wit:

a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

was committed by **ALLENCO ENERGY, INC.**

TIMOTHY JAMES PARKER

CLIFFORD E. PETER ALLEN

(whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully: fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and which states that any oil well which has not been secured in compliance with the provisions of Section 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well Number 2461, located at 814 W. 23rd Street, in the City of Los Angeles.**

COUNT 10

For a further, separate and tenth cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-9, affiant complains and says: That on or about October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor to wit:

1
2 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

3
4 was committed by **ALLENCO ENERGY, INC.**
5 **TIMOTHY JAMES PARKER**
6 **CLIFFORD E. PETER ALLEN**
7

8 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
9 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
10 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
11 which states that any oil well which has not been secured in compliance with the provisions of Section
12 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
13 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
14 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
15 **Number 2492, located at 814 W. 23rd Street, in the City of Los Angeles.**
16

17 **COUNT 11**

18 For a further, separate and eleventh cause of action, being a different offense belonging to the
19 same class of crimes and offenses set forth in Counts 1-10, affiant complains and says: That on or
20 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
21 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
22 Los Angeles, State of California, a misdemeanor to wit:

23
24 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**
25

26 was committed by **ALLENCO ENERGY, INC.**
27 **TIMOTHY JAMES PARKER**
28 **CLIFFORD E. PETER ALLEN**

(whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
which states that any oil well which has not been secured in compliance with the provisions of Section
5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well
Number 2483, located at 814 W. 23rd Street, in the City of Los Angeles.**

COUNT 12

For a further, separate and twelfth cause of action, being a different offense belonging to the
same class of crimes and offenses set forth in Counts 1-11, affiant complains and says: That on or
about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
Los Angeles, State of California, a misdemeanor to wit:

a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

was committed by **ALLENCO ENERGY, INC.**

TIMOTHY JAMES PARKER

CLIFFORD E. PETER ALLEN

(whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
which states that any oil well which has not been secured in compliance with the provisions of Section
5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice

1 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
2 **Number 2437, located at 814 W. 23rd Street, in the City of Los Angeles.**

3
4 **COUNT 13**

5 For a further, separate and thirteenth cause of action, being a different offense belonging to the
6 same class of crimes and offenses set forth in Counts 1-12, affiant complains and says: That on or
7 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
8 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
9 Los Angeles, State of California, a misdemeanor to wit:

10
11 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

12
13 was committed by **ALLENCO ENERGY, INC.**
14 **TIMOTHY JAMES PARKER**
15 **CLIFFORD E. PETER ALLEN**
16

17 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
18 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
19 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
20 which states that any oil well which has not been secured in compliance with the provisions of Section
21 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
22 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
23 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
24 **Number 2420, located at 814 W. 23rd Street, in the City of Los Angeles.**
25

26 **COUNT 14**

27 For a further, separate and fourteenth cause of action, being a different offense belonging to the
28 same class of crimes and offenses set forth in Counts 1-13, affiant complains and says: That on or

1 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
2 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
3 Los Angeles, State of California, a misdemeanor to wit:

4
5 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

6
7 was committed by ALLENCO ENERGY, INC.
8 TIMOTHY JAMES PARKER
9 CLIFFORD E. PETER ALLEN

10
11 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
12 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
13 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
14 which states that any oil well which has not been secured in compliance with the provisions of Section
15 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
16 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
17 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
18 **Number 2479, located at 814 W. 23rd Street, in the City of Los Angeles.**

19
20 **COUNT 15**

21 For a further, separate and fifteenth cause of action, being a different offense belonging to the
22 same class of crimes and offenses set forth in Counts 1-14, affiant complains and says: That on or
23 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
24 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
25 Los Angeles, State of California, a misdemeanor to wit:

26
27 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1
28

1 was committed by **ALLENCO ENERGY, INC.**
2 **TIMOTHY JAMES PARKER**
3 **CLIFFORD E. PETER ALLEN**
4

5 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
6 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
7 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
8 which states that any oil well which has not been secured in compliance with the provisions of Section
9 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
10 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
11 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
12 **Number 2440, located at 814 W. 23rd Street, in the City of Los Angeles.**
13

14 **COUNT 16**

15 For a further, separate and sixteenth cause of action, being a different offense belonging to the
16 same class of crimes and offenses set forth in Counts 1-15, affiant complains and says: That on or
17 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
18 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
19 Los Angeles, State of California, a misdemeanor to wit:

20
21 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**
22

23 was committed by **ALLENCO ENERGY, INC.**
24 **TIMOTHY JAMES PARKER**
25 **CLIFFORD E. PETER ALLEN**
26

27 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
28 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted

1 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
2 which states that any oil well which has not been secured in compliance with the provisions of Section
3 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
4 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
5 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
6 **Number 2480, located at 814 W. 23rd Street, in the City of Los Angeles.**

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 17

For a further, separate and seventeenth cause of action, being a different offense belonging to
the same class of crimes and offenses set forth in Counts 1-16, affiant complains and says: That on or
about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
Los Angeles, State of California, a misdemeanor to wit:

a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

was committed by **ALLENCO ENERGY, INC.**

TIMOTHY JAMES PARKER

CLIFFORD E. PETER ALLEN

(whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
which states that any oil well which has not been secured in compliance with the provisions of Section
5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
Number 2418, located at 814 W. 23rd Street, in the City of Los Angeles.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 18

For a further, separate and eighteenth cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-17, affiant complains and says: That on or about October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor to wit:

a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

was committed by **ALLENCO ENERGY, INC.**
TIMOTHY JAMES PARKER
CLIFFORD E. PETER ALLEN

(whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully: fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and which states that any oil well which has not been secured in compliance with the provisions of Section 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well Number 2434, located at 814 W. 23rd Street, in the City of Los Angeles.**

COUNT 19

For a further, separate and nineteenth cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts 1-18, affiant complains and says: That on or about October 13, 2019, through and including the date of filing of this Complaint, and ongoing beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor to wit:

1 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

2
3 was committed by ALLENCO ENERGY, INC.

4 TIMOTHY JAMES PARKER

5 CLIFFORD E. PETER ALLEN

6
7 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
8 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
9 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
10 which states that any oil well which has not been secured in compliance with the provisions of Section
11 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
12 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
13 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
14 **Number 2487, located at 814 W. 23rd Street, in the City of Los Angeles.**

15
16 **COUNT 20**

17 For a further, separate and twentieth cause of action, being a different offense belonging to the
18 same class of crimes and offenses set forth in Counts 1-19, affiant complains and says: That on or
19 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
20 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
21 Los Angeles, State of California, a misdemeanor to wit:

22
23 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

24
25 was committed by ALLENCO ENERGY, INC.

26 TIMOTHY JAMES PARKER

27 CLIFFORD E. PETER ALLEN

1 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
2 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
3 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
4 which states that any oil well which has not been secured in compliance with the provisions of Section
5 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
6 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
7 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
8 **Number 2408, located at 814 W. 23rd Street, in the City of Los Angeles.**

10 **COUNT 21**

11 For a further, separate and twenty-first cause of action, being a different offense belonging to
12 the same class of crimes and offenses set forth in Counts 1-20, affiant complains and says: That on or
13 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
14 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
15 Los Angeles, State of California, a misdemeanor to wit:

17 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

19 was committed by **ALLENCO ENERGY, INC.**
20 **TIMOTHY JAMES PARKER**
21 **CLIFFORD E. PETER ALLEN**

23 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
24 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
25 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
26 which states that any oil well which has not been secured in compliance with the provisions of Section
27 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
28 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice

1 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
2 **Number 2509, located at 814 W. 23rd Street, in the City of Los Angeles.**

3
4 **COUNT 22**

5 For a further, separate and twenty-second cause of action, being a different offense belonging
6 to the same class of crimes and offenses set forth in Counts 1-21, affiant complains and says: That on
7 or about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
8 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
9 Los Angeles, State of California, a misdemeanor to wit:

10
11 a violation of the **Los Angeles Municipal Code § 57.5706.3.16.1**

12
13 was committed by **ALLENCO ENERGY, INC.**
14 **TIMOTHY JAMES PARKER**
15 **CLIFFORD E. PETER ALLEN**
16

17 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
18 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
19 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
20 which states that any oil well which has not been secured in compliance with the provisions of Section
21 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
22 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
23 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
24 **Number 2498 located at 814 W. 23rd Street, in the City of Los Angeles.**
25

26 **COUNT 23**

27 For a further, separate and twenty-third cause of action, being a different offense belonging to
28 the same class of crimes and offenses set forth in Counts 1-22, affiant complains and says: That on or

1 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
2 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
3 Los Angeles, State of California, a misdemeanor to wit:

4
5 a violation of the Los Angeles Municipal Code § 57.5706.3.16.1

6
7 was committed by ALLENCO ENERGY, INC.
8 TIMOTHY JAMES PARKER
9 CLIFFORD E. PETER ALLEN

10
11 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully:
12 fail to comply with Chapter 57 of the City of Los Angeles Fire Code, Section 5706, which was adopted
13 by the Los Angeles Municipal Code, Section 57.5706.3.16.1, which regulates nonoperating wells, and
14 which states that any oil well which has not been secured in compliance with the provisions of Section
15 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to
16 produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice
17 has been given by the Chief, to wit: **failure to properly abandon or reactivate oil well LAFD Well**
18 **Number 2472, located at 814 W. 23rd Street, in the City of Los Angeles.**

19
20 **COUNT 24**

21 For a further, separate and twenty-fourth cause of action, being a different offense belonging to
22 the same class of crimes and offenses set forth in Counts 1-23, affiant complains and says: That on or
23 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
24 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
25 Los Angeles, State of California, a misdemeanor to wit:

26
27 a violation of the Los Angeles Municipal Code § 57.5706.3.7.1
28

1 was committed by ALLENCO ENERGY, INC.
2 TIMOTHY JAMES PARKER
3 CLIFFORD E. PETER ALLEN
4

5 (whose true names to affiant are unknown) fail to comply with Chapter 57 of the City of Los Angeles
6 Fire Code, Section 5706, which was adopted by the Los Angeles Municipal Code, Section
7 57.5706.3.7.1, which regulates identification signs, and states all oil wells must have an approved
8 legible sign bearing the name of the oil well, the operator thereof, and his emergency telephone
9 number shall be located and maintained on every oil well in a place where it will be fully visible.
10 There shall also be located and maintained on every oil well a sign or plate as may be required by the
11 Chief, showing such registration serial number as may be assigned to the oil well by the Chief, to wit:
12 **failure to maintain an approved sign at LAFD Well Number 2480, located at 814 W. 23rd Street,**
13 **in the City of Los Angeles.**
14

15 **COUNT 25**

16 For a further, separate and twenty-fifth cause of action, being a different offense belonging to
17 the same class of crimes and offenses set forth in Counts 1-24, affiant complains and says: That on or
18 about October 13, 2019, through and including the date of filing of this Complaint, and ongoing
19 beyond, daily and with each day being a separate offense, in the City of Los Angeles, in the County of
20 Los Angeles, State of California, a misdemeanor to wit:

21
22 a violation of the **Los Angeles Municipal Code § 57.5706.3.7.1**
23

24 was committed by ALLENCO ENERGY, INC.
25 TIMOTHY JAMES PARKER
26 CLIFFORD E. PETER ALLEN
27
28

1 (whose true names to affiant are unknown) fail to comply with Chapter 57 of the City of Los Angeles
2 Fire Code, Section 5706, which was adopted by the Los Angeles Municipal Code, Section
3 57.5706.3.7.1, which regulates identification signs, and states all oil wells must have an approved
4 legible sign bearing the name of the oil well, the operator thereof, and his emergency telephone
5 number shall be located and maintained on every oil well in a place where it will be fully visible.
6 There shall also be located and maintained on every oil well a sign or plate as may be required by the
7 Chief, showing such registration serial number as may be assigned to the oil well by the Chief, to wit:
8 **failure to maintain an approved sign at LAFD Well Number 2472, located at 814 W. 23rd Street,**
9 **in the City of Los Angeles.**

10
11 **NOTICE**
12

13 The People of the State of California intend to seek the reimbursement of costs expended in the
14 investigation of this matter pursuant to L.A.M.C. § 57.104.12.
15

16 Pursuant to L.A.M.C. §57.5706.3.16.1: You must abandon or reactivate LAFD Oil Well Numbers
17 2419, 2506, 2484, 2432, 2470, 2446, 2461, 2492, 2483, 2437, 2420, 2479, 2440, 2480, 2418, 2434,
18 2487, 2408, 2509, 2498, and 2472.
19
20
21
22
23
24
25
26
27
28