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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordinated Proceeding,
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER CASES.

Judicial Council Coordination Proceeding No.: 4408

LASC Case No. BC32501

Santa Clara Sup. Court Case No.: 1-05-CV-049053
Assigned to Hon. Jack Komar, Judge of the Santa Clara County Superior Court

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF JOHNNY LEE AND JEANETTE ZAMRZLA'S MOTION TO SET ASIDE OR MODIFY JUDGMENT

Date: May 3, 2022
Time: 9:00 a.m.

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I. INTRODUCTION

Defendants Johnny Lee and Jeanette Zamrzla bring this instant motion to set aside or modify the Antelope Valley Groundwater Judgment and Physical Solution, on the basis that they were denied due process because they were never served notice of the litigation and are not parties to the Judgment.

Johnny Lee and Jeanette Zamrzla have owned their property in Lancaster since 2007. They initially jointly acquired a 10-acre parcel, and in 2014 purchased another adjacent 10-acre parcel. The Watermaster and other parties offer no evidence whatsoever that Johnny Lee and Jeanette were ever provided notice of the litigation. The Watermaster claims that Johnny Lee and Jeanette are "clearly Parties to the Judgment as Small Pumper Class Members." (Watermaster Motion for Monetary, Declaratory and Injunctive Relief, DI No. 12095 p. 13.) However, Johnny Lee and Jeanette were never provided notice by personal service, mail, or by any other means. Their names do not appear on the Small Pumper List. They were not parties to the litigation and cannot be bound by the Final Judgment. The Watermaster has wrongfully and with overwhelming evidence to the contrary, designated Johnny Lee and Jeanette as "Unknown Small Pumpers" without due process and an opportunity to be heard regarding their overlying water production rights.

There is no evidence that Johnny Lee and Jeanette were ever served. They do not appear on any service list of any kind in the entire Antelope Valley Groundwater litigation, prior to the Watermaster's 2021 motion.

Further, the alleged mailed notice was defective on its face, because it failed to correctly describe the small pumper class. It cannot be considered to have properly notified Johnny Lee and Jeanette of the litigation and its potential effect on their rights. The Watermaster and other parties now claim Johnny Lee and Jeanette are subject to the Antelope Valley Groundwater Cases Judgment and Physical Solution (the "Judgment"), despite this lack of notice. As a matter of due process, Johnny Lee and Jeanette cannot be subject to the Judgment.

Finally, Johnny Lee and Jeanette cannot be bound by the Judgment as it pertains to small pumpers because they do not fall within the definition of the small pumper class. The irrefutable evidence establishes Johnny Lee and Jeanette exceeded the 25 acre-feet per year (AFY) in

numerous years since they acquired the subject property.

The Watermaster's attempt to impose on Johnny Lee and Jeanette exorbitant fees for allegedly over-pumping their allocation as "small pumpers" is both unjustified and unconstitutional. The reduction in Johnny Lee and Jeanette's pumping rights without the right to be heard amounts to an unconstitutional taking without due process. The fundamental requisite to due process is proper notice and the right to be heard. Johnny Lee and Jeanette have not been afforded that right. Accordingly, they cannot be bound by the judgment, and it should be modified so as not to include Johnny Lee and Jeanette, or be set aside as to them.

II. FACTUAL AND PROCEDURAL BACKGROUND

Johnny Lee and Jeanette Zamrzla have owned their property in Lancaster since 2007. They initially jointly acquired a 10-acre parcel, and in 2014 purchased another adjacent 10-acre parcel. (Compendium of Evidence "COE" Ex. 1.)

The entire history of this the Antelope Valley Groundwater litigation is too lengthy to recount here. However, after years of litigation, the Court entered Judgment on December 23, 2015, and adopted the Judgment and Physical Solution. (COE Ex. 8.) On the same date, the Court signed the Judgment Approving Small Pumper Class Action Settlements, which affected the pumping rights of members of the small pumper class. (COE Ex. 9.) There is no evidence that Johnny Lee and Jeanette were ever served with notice of the litigation – personally, by mail, or otherwise. They do not appear on any service list of any kind in the entire Antelope Valley Groundwater litigation, prior to the Watermaster's 2021 motion.

On September 29, 2021, the Watermaster filed a Motion for Monetary, Declaratory and Injunctive Relief Against Zamrzlas. (DI No. 12095). In its motion, the Watermaster alleged that Johnny Lee and Jeanette were Unknown Small Pumper Class Members with an allocation of 3 acre-feet per year, that they had pumped at least 18.46 acre-feet in 2018, and that they, therefore, owed Replacement Water Assessments totaling $6,415.90, plus interest, attorney's fees, and costs of collection. (DI No. 12095, pp. 4, 5, 9, 10). The Zamrzlas filed their opposition to the Watermaster's motion on November 12, 2021, arguing, among other things, that they had never received notice of their inclusion in the Small Pumper Class and therefore were absent persons with respect to the

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Judgment and not bound by it. (DI No. 12125, pp. 11-14). The Zamrzlas also argued that they were not, by definition, members of the Small Pumper Class. (DI. No. 12125, pp. 14-15). The Watermaster filed its reply on December 3, 2021. (DI No. 12153).

At a hearing held on the Watermaster's motion on December 10, 2021, the Court asked the parties to attempt to stipulate to a resolution of the dispute and adjourned the hearing. The parties appeared again for hearings on January 25, 2022, and on February 18, 2022, and the Court again instructed them to attempt to resolve the dispute through a stipulated agreement. When the parties next appeared at a hearing on March 4, 2022, the Court noted that the "proper way" for the Zamrzlas to contest their inclusion in the Small Pumper Class would be for them to file a motion, supported by evidence, to enable the Court to make a finding as to their "historic entitlement." (COE Ex. 7 p. 11.) The Court further noted that if any of the Zamrzla parties had been included in the Small Pumper Class "by error," then "that is an error that needs to be corrected," and that there were "processes in equity" that could be employed to correct the error. (COE Ex. 7 p. 15.)

The parties and the Court agreed that the hearing would be adjourned to May 3, 2022, and that the Zamrzlas would file a motion seeking their removal from the Small Pumper Class before that date in accordance with the Code of Civil Procedure. (COE Ex. 7 p. 25.) Johnny Lee and Jeanette Zamrzla, therefore, do so, here.

III. LEGAL ARGUMENT

A. The Court Has the Inherent Power in Equity to Modify or Set Aside the Judgment.

California courts have inherent equity power under which, apart from statutory authority, the court has the power to grant relief from a judgment where there has been extrinsic fraud or mistake. (*Weitz v. Yankosky* (1966) 63 Cal.2d 849, 855; *Hill v. Johnson* (1961) 194 Cal.App.2d 779, 782 [default set aside more than six months after judgment where record showed extrinsic mistake on the part of defendant that prevented him from having a fair adversary hearing]; *Hallett v. Slaughter* (1943) 22 Cal.2d 552, 557 ["Plaintiff was prevented by extrinsic accident and mistake of fact from presenting her defense in the municipal court action. That such accident and mistake furnish a ground for equitable intervention under the circumstances of this case is clear."])

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Equity's jurisdiction to interfere with final judgments is based upon the absence of a fair, adversary trial in the original action. "It was a settled doctrine of the equitable jurisdiction -- and is still the subsisting doctrine except where it has been modified or abrogated by statute . . . that where the legal judgment was obtained or entered through fraud, mistake, or accident, or where the defendant in the action, having a valid legal defense on the merits, was prevented in any manner from maintaining it by fraud, mistake, or accident, and there had been no negligence, laches, or other fault on his part, or on the part of his agents, then a court of equity will interfere at his suit, and restrain proceedings on the judgment which cannot be conscientiously enforced. . . . The ground for the exercise of this jurisdiction is that there has been no fair adversary trial at law." Typical of the situations in which equity has interfered with final judgments are the cases where the lack of a fair adversary hearing in the original action is attributable to matters outside the issues adjudicated therein which prevented one party from presenting his case to the court, as for example, where there is extrinsic fraud or extrinsic mistake. (*Olivera v. Grace* (1942) 19 Cal.2d 570, 575 [internal citations omitted].) Where the court that rendered the judgment possesses a general jurisdiction in law and in equity, the jurisdiction of equity may be invoked by means of a motion addressed to that court. (*Id*., at p. 576.)

Here, as described in more detail below, Johnny Lee and Jeanette are purported to be bound by the 2015 Judgment and Physical Solution, despite never being served notice of the ligation, and therefore being denied their right to an adversarial hearing and proceeding concerning their water production rights. As shown below, Johnny Lee and Jeanette were never served with notice of the underlying litigation, therefore, their inclusion as unknown "small pumpers" bound by the Judgment and Physical Solution is improper and violates their right to due process under both the US and California Constitutions. As a matter of equity, the Court has the inherent power to revisit the judgment vis-a-vis Johnny Lee and Jeanette.

B. The Judgment Should be Set Aside Because Johnny Lee and Jeanette Zamrzla Have Been Denied Due Process as They Were Never Served Notice of the Antelope Valley Groundwater Litigation.

No person shall be deprived of life, liberty, or property, without due process of law. (USCS Const. Amend. 5.) No State shall make or enforce any law which shall abridge the privileges or

immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. (USCS Const. Amend. 14 § 1.) A person may not be deprived of life, liberty, or property without due process of law… (Cal. Const., Art. I § 7.) The fundamental requisite of due process of law is the opportunity to be heard. (*Grannis v. Ordean* (1914) 234 U.S. 385, 394.)

An elementary and fundamental requirement of due process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. The notice must be of such nature as reasonably calculated to convey the required information, and it must afford a reasonable time for those interested to make their appearance. (*Mullane v. Cent. Hanover Bank & Trust Co.* (1950) 339 U.S. 306, 314 [internal citations omitted].) Personal service of written notice within the jurisdiction is the classic form of notice always adequate in any type of proceeding. (*Mullane, supra*, at p. 313.)

Peralta v. Heights Medical Center, Inc., involved a Texas lawsuit to recover a guaranteed $5,600 hospital debt. Citation issued, the return showing personal, but untimely, service. Appellant Peralta did not appear or answer, and default judgment was entered for the amount claimed, plus attorney's fees and costs. Two years later, appellant began a bill of review proceeding in the Texas courts to set aside the default judgment and obtain other relief. Appellant alleged he was never personally served, and thus the judgment was void. The Texas courts held that to have the judgment set aside, appellant was required to show that he had a meritorious defense, apparently on the ground that without a defense, the same judgment would again be entered on retrial, and hence appellant had suffered no harm from the judgment entered without notice. The *Peralta* court held this reasoning was untenable. As Peralta asserted, had he had notice of the suit, he might have impleaded the employee whose debt had been guaranteed, worked out a settlement, or paid the debt. He would also have preferred to sell his property himself in order to raise funds rather than to suffer it sold at a constable's auction. The *Peralta* court also found there was no doubt that the entry of the judgment itself had serious consequences, as the judgment was entered on the county

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records, became a lien on appellant's property, and was the basis for issuance of a writ of execution under which appellant's property was promptly sold, without notice. Even if no execution sale had yet occurred, the lien encumbered the property and impaired appellant's ability to mortgage or alienate it; and state procedures for creating and enforcing such liens are subject to the strictures of due process. (*Peralta v. Heights Medical Center, Inc.* (1988) 485 U.S. 80, 84-86.)

Thus, the *Peralta* court held that due process demanded that only "wiping the slate clean . . . would have restored the petitioner to the position he would have occupied had due process of law been accorded to him in the first place." (*Peralta, supra*, 485 U.S. at p. 86 quoting *Armstrong v. Manzo* (1965) 380 U.S. 545, 552.) The Court held that failure to give notice violates the most rudimentary demands of due process of law. (*Peralta, supra*, 485 U.S. at p. 84.)

Since *Mullane* was decided, California has regularly turned to it when confronted with questions regarding the adequacy of the method used to give notice. (*People v. Gonzalez* (2003) 31 Cal.4th 745, 754.) *Mullane* requires a reviewing court to determine whether the method of notice is "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." (*Id*., citing *Mullane, supra*, 339 U.S. at p. 314.) Water rights are subject to due process. Once rights to use water are acquired, they become vested property rights. As such, they cannot be infringed by others or taken by governmental action without due process and just compensation. (*United States v. State Water Res. Control Bd.* (1986) 182 Cal.App.3d 82, 101.) Due process principles require reasonable notice and opportunity to be heard before governmental deprivation of a significant property interest. (*Horn v. Cty. of Ventura*, (1979) 24 Cal.3d 605, 612.) It is well settled that "the judgment in a class action binds only those class members who had been notified of the action and who, being so notified, had made no request for exclusion." (*Steen v. Fremont Cemetery Corp.* (1992) 9 Cal.App.4th 1221, 1227.) The notice requirement is not only important and essential to the correct determination of the main issue it is, above all, jurisdictional. (*Id*., at p. 1227-1228.)

Here, Johnny Lee and Jeanette were never served with notice of the litigation despite owning land in the Antelope Valley and frequently pumping more than 25 AFY on a yearly basis. No notice was sent to Johnny Lee and Jeanette, and thus Johnny Lee and Jeanette cannot be found

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to have received notice of the litigation. Johnny Lee and Jeanette are separate individuals, owning separate property from Johnny and Pamella. Service is effective on the person served, not on some other individual, no matter how closely related.

The Watermaster and other parties offer no evidence whatsoever that Johnny Lee and Jeanette were provided notice. The Watermaster claims that Johnny Lee and Jeanette are "clearly Parties to the Judgment as Small Pumper Class Members." (DI No. 12095, p. 13.) However, Johnny Lee and Jeanette were never provided notice by personal service, mail, or by any other means. Their names do not appear on the Small Pumper List or any other list that identifies them as Parties in the adjudication. Thus, they were not parties to the litigation and cannot be subject to the Final Judgment.

The Watermaster has wrongfully and with overwhelming evidence to the contrary, designated Johnny Lee and Jeanette as "Unknown Small Pumpers" without due process and without an opportunity to be heard regarding their overlying water production rights. Johnny Lee and Jeanette cooperatively provided their water usage history to the Watermaster. (COE Ex. 1; DI 12126 Ex. J.) The evidence provided to the Watermaster established that Johnny Lee and Jeanette were not "small pumpers." Nonetheless, the Watermaster reached the unfounded conclusion that "at this point, J&J qualify as Unknown Small Pumper Class Members as defined in 5.1.3.6 of the Judgment, and are likewise Parties bound by the terms of the Judgment." (DI 12153 p. 3.) Despite the information clearly establishing that they do not meet the definition of Small Pumper Class Members the Watermaster asserts that Johnny Lee and Jeanette are "Unknown Small Pumper Class Members who have not yet gone through the process to qualify as Small Pumper Class Members." (DI 12095, Rose Decl.) The Watermaster provides no legal justification for this contention.

The only argument presented by the Watermaster to support their unfounded claim that Johnny Lee and Jeanette are parties to the Judgment is found in the Watermaster's Reply to Zamrzlas Opposition where the Watermaster disingenuously asserts that ".. at all times relevant to the Adjudication were immediately adjacent neighbors, close relatives and business partners with J&P, and therefore undoubtedly received repeated notice of the Adjudication and the need to affirmatively participate in the litigation in order to assert any alleged Overlying Production

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Rights." (DI 12153 p. 3.) This assertion by the Watermaster is supported by no legal authority because it is so contrary to any notion of lawful notice that is required to bind a party to a Judgment. (See *Peralta, supra,* 485 U.S. 80.*)* The Watermaster claims it is highly improbable that the Zamrzlas did not receive actual, much less constructive, notice of the Small Pumper Class Action and the Adjudication. (DI 12153 p. 4.) The Zamrzlas have provided sworn declarations that actual notice was never received and the Watermaster has provided no evidence to the contrary. (COE Ex. 1-3.)

Pursuant to the Final Judgment Decree in reference to Jurisdiction and Parties, "The Court required that all Persons having or claiming any right, title or interest to the Groundwater within the Basin be notified of the Action." (COE Ex. 8, section 3.2.) Parties were defined as "Any Person(s) that has (have) been named and served or otherwise properly joined, or has (have) become subject to this Judgment any prior judgments of this Court in this Action…" (COE Ex. 8, section 3.5.27.) In no section throughout the 224 pages of the Final Judgment does it purport to bind persons as parties because they might have heard about the litigation and should have interjected themselves into it to maintain their water rights. To rely upon a "constructive notice" conclusion as the Watermaster proposes, would be contrary to the tenets of fairness, equity, and all basic principles of jurisprudence.

"Constructive notice" is not actual notice and is not legally sufficient to bind a person to the Judgment. The Watermaster propounds the absurd argument that "[Johnny Lee and Jeanette], as neighbors, family members, and business partners of [Johnny and Pamella], were likewise put on constructive notice at the very least by way of the notice provided to [Johnny and Pamella], and were obligated to affirmatively assert any claim as overlying Producers by participating in the Adjudication." (DI 12153 p. 7.) To accept the Watermaster's "constructive notice" as sufficient notice would not only require this court to disregard the mandatory notice requirements outlined in the Judgment, but also ignore the due process rights afforded by the United States and California Constitutions. This constructive notice theory is not only unsupported by any legal authority, but violates the *Mullane* mandate that the elementary and fundamental requirement of due process in any proceeding which is to be accorded finality is notice reasonably calculated, under all the

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circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. (*Mullane, supra*, 339 U.S. 306, 314.) The Watermaster's "constructive notice" theory is wholly unsupported by any legal authority and violates basic due process requirements.

Here, due process demands nothing less than actual notice when seeking to take overlying property water rights from Johnny Lee and Jeanette. Accordingly, Johnny Lee and Jeanette cannot be bound by the Judgment.

C. Even if Johnny Lee and Jeanette Zamrzla Had Been Served by Mail, Service Was Defective.

The right to due process has little reality or worth unless one is informed that the matter is pending and can choose for himself whether to contest. (*Traverso v. People ex rel. Dept. of Transportation* (1993) 6 Cal.4th 1152, 1163 quoting *Goss v. Lopez* (1975) 419 U.S. 565, 579 and *Mullane v. Central Hanover Tr. Co.* (1950) 339 U.S. 306, 314.) The notice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. The notice must be of such nature as reasonably to convey the required information, and it must afford a reasonable time for those interested to make their appearance. (*Mullane, supra,* 339 U.S. at p. 314; *People v. Gonzalez* (2003) 31 Cal.4th 745, 754.)

The June 26, 2009 Notice of Class Action, which was never actually mailed to the Zamrzlas, was also defective for multiple reasons. First, it materially differs from the Court's order regarding small pumpers. On September 2, 2008, the Court issued an order certifying the Small Pumper class. The Court described the class as all persons "that have been pumping less than 25 acre-feet per year on their property during any year from 1946 to the present." (COE Ex. 9.) However, the Notice of Class Action for the "Small Pumper" Class Action, dated June 26, 2009, states:

ARE YOU A MEMBER OF THE CLASS?

> You have been designated as a possible class member because records show that you may own improved property in the Antelope Valley. The class includes all private (i.e., non-governmental) landowners within the Antelope Valley Groundwater Basin that have pumped groundwater on their property at any time since 1946,

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> with certain exceptions set out below.
>
> You are NOT in the Class if you fall within one of the categories set forth below. BUT YOUR RIGHTS MAY BE AFFECTED UNLESS YOU RETURN THE ATTACHED RESPONSE FORM AND MAKE CLEAR THAT YOU ARE NOT IN THE CLASS. HENCE, IT IS IMPORTANT THAT YOU RETURN THE RESPONSE FORM AS PROMPTLY AS POSSIBLE, EVEN IF YOU ARE NOT A CLASS MEMBER.
>
> YOU ARE NOT IN THE CLASS WITH RESPECT TO ANY GIVEN PARCEL OF PROPERTY IF THAT PARCEL FALLS WITHIN ANY OF THE FOLLOWING CATEGORIES:
>
> 1. You have pumped 25 acre-feet or more of groundwater for use on that parcel in any calendar year since 1946; or
>
> 2. You are a shareholder in a mutual water company in the Antelope Valley; or
>
> 3. You are already a party to this litigation (but, in that event, you may elect to join the Class).

Per section 1 of the Small Pumper Notice, a landowner is not a member of the class if, in *any* year since 1946 the landowner pumped 25 acre-feet or more. This definition thus materially differs from the definition in the class certification order. It also differs from the definition of the Small Pumper Class found at section 3.5.44 of the Judgment and Physical Solution, which states small pumpers are those persons "that have been pumping less than 25 acre-feet per year on their property during any Year from 1946 to the present." This discrepancy in the class definition renders the notice deficient on its face, as it would mislead anyone reading the notice regarding who is properly a member of the small pumper class. Such discrepancies between the notice and the class definition cannot be said to have been reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. Nor does such notice reasonably convey the required information. The notice thus fails the basic test of *Mullane v. Cent. Hanover Bank & Trust Co.* (1950) 339 U.S. 306 regarding the sufficiency of notice.

Further, even had the notice been sent to Johnny Lee and Jeanette, they would not have understood it to apply to them, as they regularly exceeded 25 acre-feet per year, as shown below in

Section D. Thus, even had Johnny Lee and Jeanette received the notice, upon reading the class definition, they would have immediately understood themselves not to be members of the Small Pumper Class, as the notice explicitly excludes those persons who "have pumped 25 acre-feet or more of groundwater for use on a that parcel in any calendar year since 1946." Johnny Lee and Jeanette would have had no reason to believe themselves to be part of any litigation based on this notice, and certainly would not have understood they were bound by any Small Pumper Class judgment or settlement.

A notice that fails to actually notify is tantamount to no notice at all. As a matter of due process, Johnny Lee and Jeanette cannot be bound by the deficient mail notice, that they never even received.

D. Johnny Lee and Jeanette Zamrzla do Not Meet the Small Pumper Class Definition and Should Not Be Subject to the Small Pumper Water Pumping Limits.

Apart from the notice deficiencies, another critical problem, in this case, is that the Zamrzlas do not fit the definition of the Small Pumper class. The amount of water the Zamrzlas pumped was established in a study by Rick Koch, of Southern California Edison. (COE Ex. 4.)

The Koch study, and accompanying declaration dated November 3, 2021, were filed in connection with the Zamrzlas' opposition to the Watermaster's Motion for Monetary, Declaratory and Injunctive Relief Against Zamrzlas. (DI No. 12095). Mr. Koch, a Technical Specialist in the Hydraulic Services Department of Southern California Edison ("SCE"), performed a pump test on the well located on Johnny Lee and Jeanette's property (the "Pasture Well") between January 2013 and September 2018. The SCE test results and kWh consumed are used to calculate the number of acre-feet of water produced by the well. SCE testing and calculation methods have been accepted by the Court to establish water usage history. Mr. Koch calculated the number of acre-feet of water produced by Johnny Lee and Jeanette's well:

YEAR	PASTURE WELL
	ACRE-FEET PUMPED
2011	34.4

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2012	15.2
2013	30.0
2014	21.4
2015	60.0
2016	79.4
2017	48.9
2018	18.4

According to Mr. Koch's analysis, the Pasture Well produced more than 25 acre-feet per year in five out of eight years from 2011 through 2018. Mr. Koch's results thus establish that Johnny Lee and Jeanette regularly exceeded 25 AFY and on that basis should not be considered members of the Small Pumper Class.

IV. CONCLUSION

Johnny Lee and Jeanette never received notice of the Antelope Valley Groundwater litigation. They do not appear on any service list or mailing list, and there is no evidence, of any kind that they were ever served notice. Even had they received notice, the language of the mailed notice would have simply caused them to believe they were not members of the Small Pumper Class, as they frequently pumped more than 25 AFY. Johnny Lee and Jeanette are entitled to due process. The Judgment should be modified or set aside as to them.

Dated: April 11, 2022

MATHENY SEARS LINKERT & JAIME, LLP

By: _____

NICHOLAS R. SHEPARD, ESQ.,
Attorney for Defendants, JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA

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