

1 DAN DOW  
District Attorney, County of San Luis Obispo  
2 KENNETH J. JORGENSEN (SBN: 220887)  
Deputy District Attorney  
3 1035 Palm Street, Room 450  
4 San Luis Obispo, CA 93408  
Telephone (805) 781-5800  
5 e-mail: kjorgensen@co.slo.ca.us

6 Attorneys for Plaintiff

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN LUIS OBISPO**

10 THE PEOPLE OF THE STATE OF  
11 CALIFORNIA,

COURT NO. 24CV-0076

**STIPULATION AND ORDER TO  
PAY CIVIL PENALTIES FOR  
VIOLATION OF INJUNCTION**

12  
13 Plaintiff,

14 v.

15 BRAD WILLIAM LEAGE, an individual,

16  
17 Defendant.

18  
19 Plaintiff, the People of the State of California, appearing through its attorneys,  
20 DAN DOW, District Attorney, by KENNETH JORGENSEN, Deputy District Attorney, and  
21 Defendant BRAD WILLIAM LEAGE, in individual (“Defendant”), appearing through his  
22 attorney, Jeffrey D. Stulberg, hereby stipulates as follows:

23 1. The proposed *Final Civil Judgment and Order Pursuant to Stipulation* (“Final  
24 Judgment”), a copy of which is attached hereto as Exhibit 1 and incorporated by this reference,  
25 may be entered as set forth herein, without the taking of proof and without trial or adjudication  
26 of any issue of law, and without the Final Judgment constituting evidence or an admission or  
27 denial by Defendant regarding any issue of fact or law alleged in the Complaint in this action,  
28

1 except as specified herein:

- 2 a. Defendant at all relevant times is the operator of commercial passenger  
3 fishing vessel (CPFV), the Endeavor, based out of the port of Morro Bay,  
4 County of San Luis Obispo.
- 5 b. Each year, since 2019, Defendant regularly takes out paying passengers on  
6 the Endeavor on sportfishing trips to fish for rockfish and lingcod.
- 7 c. Defendant is required by California law to complete and submit to the  
8 California Department of Fish and Wildlife (Department) an accurate  
9 record of fishing activities. Those reported activities include the accurate  
10 number of crew that fished on a trip and an accurate number of fish caught  
11 by that crew.
- 12 d. Since 2019, Defendant admits that on two occasions he intentionally  
13 misreported to the Department the number of crew that fished on a trip and  
14 the number of fish caught by the crew. Defendant admits that by  
15 inaccurately reporting the number of crew members fishing and the number  
16 of fish each crew member caught, he was able to increase the boat's  
17 maximum catch limit. Defendant admits that had he accurately reported the  
18 number of crew fishing and the fish caught, the reports he filed to the  
19 Department would have shown the boat had exceeded the lawful number of  
20 fish permitted.
- 21 e. Defendant admits that on the two occasions in the past five years that the  
22 Department had uncover officers aboard for trips operated by Defendant,  
23 Defendant allowed passengers to take rockfish in excess of lawful boat  
24 limits and caused the waste of fish.

25 2. Defendant acknowledges that the Superior Court of the State of California,  
26 County of San Luis Obispo, has jurisdiction of the subject matter hereto, and has personal  
27 jurisdiction over Defendant.

28


1           3.       Defendant hereby waives the right to appeal, to attempt to set aside or vacate, or  
2 otherwise to attack, directly or collaterally, the Final Judgment filed pursuant to this Stipulation.

3           4.       Payments are to be made according to the provisions set forth in the Final  
4 Judgment.

5  
6 **For The People**

7 DAN DOW, District Attorney  
8 County of San Luis Obispo, State of California

9 DATED: 1/26/2024

By   
10 KENNETH J. JORGENSEN  
11 Senior Deputy District Attorney

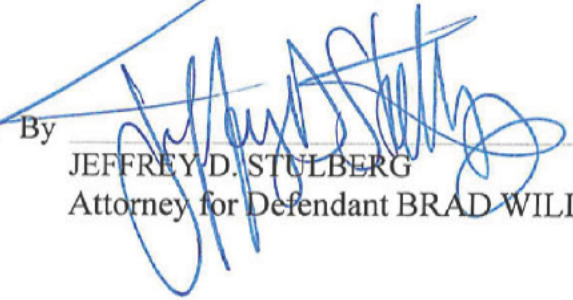
12 **For the Defendant**

13  
14 DATED: 1/26/2024

By   
15 BRAD WILLIAM LEAGE  
16 an individual

17 JEFFREY D. STULBERG, a law corporation

18  
19 DATED: 1/24/2024

By   
20 JEFFREY D. STULBERG  
21 Attorney for Defendant BRAD WILLIAM LEAGE  
22  
23  
24  
25  
26  
27  
28

1 DAN DOW  
District Attorney, County of San Luis Obispo  
2 KENNETH J. JORGENSEN (SBN: 220887)  
Deputy District Attorney  
3 1035 Palm Street, Room 450  
4 San Luis Obispo, CA 93408  
Telephone (805) 781-5800  
5 e-mail: kjorgensen@co.slo.ca.us

6 Attorneys for Plaintiff

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN LUIS OBISPO**

10 THE PEOPLE OF THE STATE OF  
11 CALIFORNIA,

12  
13 Plaintiff,

14 v.

15 BRAD WILLIAM LEAGE, an individual

16  
17 Defendant.

COURT NO. 24CV-0076

**FINAL CIVIL JUDGMENT AND  
ORDER PURSUANT TO  
STIPULATION**

18  
19 Plaintiff, the People of the State of California, appearing through its attorneys, DAN  
20 DOW, District Attorney of San Luis Obispo County, by KENNETH J. JORGENSEN, Deputy  
21 District Attorney, and Defendant BRAD WILLIAM LEAGE (“Defendant”), appearing through  
22 his attorney, Jeffrey D. Stulberg, appearing through having stipulated to the entry of this Final  
23 Civil Judgment Pursuant to Stipulation (“Final Judgment”) without the Court taking evidence,  
24 and the Court having considered the pleadings and good cause appearing:

25 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff have  
26 judgment against Defendant as follows:  
27  
28



1 civil penalties with a minimum monthly payments of \$4,000.00 on or before July 1, 2024;  
2 August 1, 2024; and September 1, 2024.

3 7. Civil penalty payments shall be by cashier's checks, money orders, or certified  
4 checks. Upon full payment of the sum of \$12,000, all monetary fines, fees and damages sought,  
5 or which could be sought in this action are deemed satisfied in full. The payments required by  
6 this Judgment shall be made payable to Treasurer of the County of San Luis Obispo. Payment(s)  
7 shall be delivered to KENNETH J. JORGENSEN, Deputy District Attorney, Consumer and  
8 Environmental Protection Unit, San Luis Obispo County District Attorney's Office, 1035 Palm  
9 Street, Room 450, San Luis Obispo, CA 93408, San Luis Obispo, California, 93408.

10 8. All notices, reports and correspondence required by or in conjunction with this  
11 Final Judgment shall be in writing and sent by U.S. Mail and e-mail to:

12 IF TO PLAINTIFF: San Luis Obispo County District Attorney  
13 Consumer and Environmental Protection Unit  
14 Attention: KENNETH J. JORGENSEN, DDA  
15 1035 Palm Street, Room 450  
16 San Luis Obispo, CA 93408

Email: [kjorgensen@co.slo.ca.us](mailto:kjorgensen@co.slo.ca.us)

17 IF TO DEFENDANT: Jeffrey D. Stulberg  
18 755 Santa Rosa St., #300  
19 San Luis Obispo, CA 93401

Email: [jstulberg@stulbergandtatum.com](mailto:jstulberg@stulbergandtatum.com)

20  
21 **RETENTION OF JURISDICTION**

22 9. Jurisdiction shall be retained by the Court for the purpose of enabling any party  
23 to this Final Judgment to apply to the Court at any time for such further orders, directions,  
24 modifications, or terminations as may be necessary or appropriate for the construction, carrying  
25 out, modification or termination of any of the injunctive provisions of this Final Judgment, and  
26 the enforcement of compliance herewith; or for the punishment of violations hereunder.  
27  
28

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

**EFFECT OF FINAL JUDGMENT**

10. Nothing in this Final Judgment shall be construed as limiting, altering, or otherwise affecting the rights, procedures, and protections afforded to Defendant under California Fish and Game Code, nor shall a minor violation that is cured be considered a violation of this Final Judgment.

**INTEGRATION**

11. This Final Judgment constitutes the entire agreement between the Parties hereto and may not be amended or supplemented except as provided herein.

**MODIFICATION**

12. This Final Judgment may be modified upon written consent by all Parties and the approval of the Court.

13. The clerk is ordered to enter this Judgment immediately, and to provide notice to the Parties through counsel.

**IT IS SO ORDERED.**

DATED 2/1/2024 By   
JUDGE OF THE SUPERIOR COURT