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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF SACRAMENTO**

JOSE CRUZ CHAVEZ, individually, and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

HEMINGTON LANDSCAPE SERVICES, INC.,  
a California corporation; and DOES 1 through  
10, inclusive,

*Defendants.*

Case No.: 34-2022-00324239-CU-OE-GDS  
(consolidated with Case No.: 34-2022-  
00328975-CU-OE-GDS)

*Assigned for all purposes to:*  
*Hon. Jill H. Talley*  
*Dept. 23*

**DECLARATION OF NATALIE MOORE**

**PRELIMINARY APPROVAL HEARING**

Date: August 29, 2025

Time: 9:00 a.m.

Dept: 23

|                        |                  |
|------------------------|------------------|
| Class Complaint filed: | July 26, 2022    |
| PAGA Complaint filed:  | October 27, 2022 |
| Trial date:            | Not set          |

**DECLARATION OF NATALIE MOORE**

I, **Natalie Moore**, declare as follows:

1. The facts set forth in this declaration are true and correct and are known to me personally except those matters stated on information and belief. If called as a witness, I could and would testify competently thereto under oath.
2. I am an attorney licensed to practice before the courts of the State of California.
3. Since 2023, I have served as the Executive Director of CASA (Court Appointed Special Advocates) El Dorado.
4. CASA El Dorado was formed in 1992 and is a nonprofit organization providing support, empowerment, and a voice for the abused-neglected and at-risk youth in our community; and is a child advocacy program consistent with California Code of Civil Procedure Section 384. For over 30 years, CASA El Dorado has provided advocacy for children involved in juvenile court proceedings in El Dorado County. CASA El Dorado recruits, trains, and supports the volunteer CASAs. CASA volunteers are appointed by the court and serve as consistent, caring adult advocates who gather information from the child, parents, family members, social workers, educators, and healthcare providers to prepare fact-based recommendations that assist the court in determining the best interests of the child. CASA El Dorado's nonprofit status and work providing advocacy to children make it an appropriate designee of *cy pres* funds as described more specifically below.
5. The Honorable David Soukup initiated the CASA program in Seattle, Washington in 1977. He realized that he did not have enough information to make an informed decision about the future of neglected and abused children coming before him. In Judge Soukup's words, "In criminal and civil cases, even though there were always many different points of view, you walked out the courthouse at the end of the day and you said, I've done my best; I can live with this decision". In his effort to become more informed in his decisions about the future of these children, Judge Soukup conceived the idea of using trained community volunteers to speak for the best interests of these children in court.
6. In 1992, Judge Patrick Riley started CASA of El Dorado County. In 1994, services were expanded to South Lake Tahoe to ensure services are provided to all of El Dorado County.

- 1 7. CASA El Dorado recruits, screens, and conducts thorough background checks on all  
2 volunteer CASA advocates. Volunteers receive comprehensive training that meets the  
3 standards established by the National Court Appointed Special Advocates Association  
4 (National CASA). Additionally, all CASA volunteers are mandated reporters,  
5 committed to ensuring the safety and well-being of the children they serve.
- 6 8. CASA El Dorado provides initial volunteer trainings twice each quarter, as well as  
7 continuing education opportunities twelve months out of the year. Continuing  
8 education trainings are conducted in collaboration with community partners, including  
9 Child Protective Services, the youth shelter and other service providers to enhance the  
10 knowledge base and skills of our advocates. Additionally, CASA El Dorado actively  
11 participates in community events to recruit new volunteers, with the goal of serving as  
12 many children in the community as possible.
- 13 9. In juvenile dependency matters, children assisted by Court Appointed Special Advocate  
14 (CASA) volunteers include those whose placement and care decisions are being adjudicated  
15 by the dependency court. Many of these children have experienced abuse, neglect, or  
16 abandonment. CASA volunteers are appointed by the court to conduct thorough,  
17 independent investigations into the child's circumstances and to provide the court with  
18 well-informed, objective recommendations that serve the best interests of the child.
- 19 10. When assigned to a dependency case, the CASA volunteer is responsible for evaluating  
20 whether it is in the child's best interest to remain with their biological parents or to be  
21 placed in an alternative environment. The CASA volunteer submits formal written reports  
22 and recommendations to the judge including but not limited to: placement, services, and  
23 permanency planning. CASAs continue their involvement in the case until a permanent  
24 resolution is reached.
- 25 11. In order to make these informed recommendations, CASA volunteers engage in regular and  
26 consistent contact with the child, typically on a weekly basis, and consult with key  
27 individuals involved in the child's life, including parents, relatives, social workers,  
28 educators, medical and mental health providers, and others with relevant information.
12. CASA volunteers serve not only as advocates but also as consistent, caring, and reliable  
adult figures in the child's life. By maintaining consistent, personal contact and meeting the  
child where they are physically, mentally, and emotionally; CASA volunteers offer support  
that is specifically tailored to each child's unique needs. In doing so, they help reduce

1 trauma, promote stability, and ensure that the child has a dedicated, trustworthy adult solely  
2 focused on their well-being and future.

3 13. CASA volunteers may also be appointed to advocate for youth involved in the juvenile  
4 justice system: minors who have committed offenses and are placed on formal probation.  
5 This probation may include detention in a Juvenile Hall or alternative placement settings. In  
6 such cases, the CASA volunteer conducts interviews with all relevant parties, including the  
7 youth, family members, teachers, therapists, and the youth's legal counsel. The volunteer  
8 gathers and reviews information from these sources and submits a written report to the  
9 court containing factual findings along with recommendations or informed opinions  
10 intended to support the court in making decisions that promote the youth's rehabilitation,  
11 safety, and best interests.

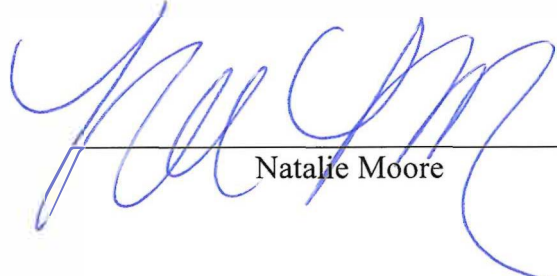
12 14. A youth served by CASA El Dorado for over three years, hereinafter referred to as RB for  
13 confidentiality, provided a letter describing the impact of the CASA El Dorado Program. In  
14 the letter, RB stated, "The CASA Program has quite literally made me who I am today. The  
15 relationship and rapport I built with my mentor is long lasting, and I no longer expect this  
16 relationship to end once I am out of the program." RB further wrote, "It is not very often  
17 that someone enters your life to genuinely help you out of the hole you're in, shine light  
18 into the darkness, and water the soil that decade old seeds are sowed in." RB emphasized  
19 that these challenges "are faced every day, and more often than not, by young people," who  
20 are "in deep need of support, and community, and for just once, a person to look at them,  
21 see them for who they are, and say 'I'm going to be there for you.'" RB concluded, "CASA  
22 does that work. CASA is the community superhero, who has the resources and ability to  
23 advocate, guide, and support these young individuals. I'm so grateful I was able to be one  
24 of those kids with those problems, because now CASA has helped me out of that deep dark  
25 hole."

26 15. If awarded *cy pres* funds in this matter, the funds will support and enhance CASA El  
27 Dorado's child advocacy programs. The funds will support the recruitment, screening,  
28 training, and ongoing support of volunteer CASA advocates who are appointed by the court  
to represent the best interests of abused, neglected, and at-risk youth involved in juvenile  
court proceedings in El Dorado County. The funds will also support CASA El Dorado's  
efforts to maintain and expand consistent, thorough, and compassionate advocacy services,  
including the collection and presentation of fact-based recommendations to assist the court

1 in making informed decisions regarding the placement, care, and well-being of the children  
2 served.

3 I declare under penalty of perjury pursuant to the laws of the State of California that the  
4 foregoing is true and correct. Executed on this 6<sup>th</sup> day of August, 2025, at Placerville, California.

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Natalie Moore