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SUM-100

SUMMONS
(CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

ELECTRONICALLY FILED
Superior Court of California,
County of Kern
By: Javen Silva
Deputy Clerk
10/21/2026

NOTICE TO DEFENDANT: COUNTY OF KERN, a California public entity;
(AVISO AL DEMANDADO): DOE 1, individually and as Trustee of the WONG FAMILY TRUST; and DOES 2 through 10, inclusive,

YOU ARE BEING SUED BY PLAINTIFF: JULIE FACKRELL, an individual,
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (*www.courtinfo.ca.gov/selfhelp*), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (*www.lawhelpcalifornia.org*), the California Courts Online Self-Help Center (*www.courtinfo.ca.gov/selfhelp*), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of $10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.
¡AVISO! *Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.*

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de $10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is: SUPERIOR COURT OF CALIFORNIA
(El nombre y dirección de la corte es): COUNTY OF KERN
1215 TRUXTUN AVENUE
BAKERSFIELD, CA 93301

CASE NUMBER:
(Número del Caso): 26CUB03736

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
JULIE FACKRELL 1950 W Rosamond Blvd., Unit 430 Rosamond, CA 93560 805-293-0830

DATE: *(Fecha)* 10/21/2026 Tara Leal Clerk, by *(Secretario)* Javen Silva , Deputy *(Adjunto)*

(For proof of service of this summons, use Proof of Service of Summons *(form POS-010).)*
(Para prueba de entrega de esta citatión use el formulario Proof of Service of Summons, *(POS-010)).*

[SEAL]

NOTICE TO THE PERSON SERVED: You are served
1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of *(specify):*
3. ☐ on behalf of *(specify):*
   under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
   ☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
   ☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
   ☐ other *(specify):*
4. ☐ by personal delivery on *(date):*

Page 1 of 1

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 [Rev. July 1, 2009]

SUMMONS

Code of Civil Procedure §§ 412.20, 465
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ELECTRONICALLY FILED
Superior Court of California,
County of Kern
By: Javen Silva
Deputy Clerk
09/21/26 8:43 PM

JULIE FACKRELL, an individual,

Plaintiff in Propria Persona

1950 W Rosamond Blvd.

Unit 430

Rosamond, CA 93560

805-293-0830 julie_fackrell@yahoo.com

SUPERIOR COURT OF CALIFORNIA

COUNTY OF KERN

JULIE FACKRELL, an individual, Plaintiff, v. COUNTY OF KERN, a California public entity; DOE 1, individually and as Trustee of the WONG FAMILY TRUST; and DOES 2 through 10, inclusive, Defendants.	CASE NO: 26CUB03736 (Unlimited Civil Case) **COMPLAINT FOR DECLARATORY RELIEF AND REQUEST FOR TEMPORARY, PRELIMINARY, AND PERMANENT INJUNCTIVE RELIEF** Code Civ. Proc., §§ 1060, 525 et seq.

Plaintiff Julie Fackrell ("Plaintiff"), appearing in propria persona, alleges as follows:

I. NATURE OF THE ACTION

1. Plaintiff Julie Fackrell brings this action concerning a present dispute over the physical location of the boundary between real property conveyed to her as Parcel 5 of Record of Survey Map No. 2050, Book 7, Page 71, associated in Kern County records with APN 252-151-04-00, and neighboring property presently attributed by Kern County to the Wong Family Trust as APN 252-151-13.

2. Plaintiff purchased her Rosamond property in April 2025 believing that the physical land she took possession of was the property conveyed to her. Her corrected recorded Grant Deed identifies her property as Parcel 5 and APN 252-151-04-00.

3. Kern County recognizes APN 252-151-04-00 as Plaintiff's parcel and has processed Plaintiff's residential permit application in association with that parcel.

4. At the same time, Kern County presently maintains that Plaintiff's RV, shipping containers, personal belongings, trees, infrastructure, and other physical property at the location she has occupied since the purchase are instead situated on APN 252-151-13, which the County attributes to the Wong Family Trust.

5. Plaintiff disputes that physical-location determination. Plaintiff does not ask this Court, before competent boundary evidence is available, to assume that either Plaintiff's or Defendants' present boundary position is correct.

6. Plaintiff has retained licensed land surveyor Mark Wittig to professionally determine and mark the physical boundary. The survey is scheduled for October 12, 2026, subject to an earlier cancellation opening.

7. Kern County has identified tagging as a contemplated next enforcement step concerning Plaintiff's physical property after Plaintiff returns to California. Plaintiff requested that parcel-dependent enforcement be held until the licensed survey is completed but has not received an unequivocal written commitment that the County will do so.

8. Persons asserting rights through the Wong Family Trust have separately asserted that Plaintiff is trespassing and demanded that Plaintiff remove herself and her belongings from property they claim belongs to the Trust. During an August 17, 2026 encounter at the property involving Kern County Sheriff's deputies and Kern County Code Compliance Officer Roland Lopez, a Wong-associated person also told Plaintiff that they could have her arrested for trespassing.

9. Plaintiff therefore seeks narrowly tailored declaratory and equitable relief sufficient to preserve existing physical conditions while the licensed survey is completed and the parties' respective rights can thereafter be addressed on competent boundary evidence and through ordinary legal process.

10. Plaintiff does not seek through this action to excuse or prevent legitimate zoning, building, permitting, health-and-safety, or Code Compliance requirements that operate independently of the disputed parcel attribution. Plaintiff does not seek damages in this action.

II. PARTIES

11. Plaintiff JULIE FACKRELL is an individual and the recorded owner of real property described in her corrected Grant Deed as Parcel 5 of Record of Survey Map No. 2050, Book 7, Page 71. Kern County records associate Plaintiff's parcel with APN 252-151-04-00.

12. Defendant COUNTY OF KERN ("County") is a California public entity. Through its Public Works Department, Code Compliance personnel, and other agents, the County has undertaken the enforcement activity giving rise to the present controversy.

13. Plaintiff presently does not know the identity or identities of the current trustee or trustees of the Wong Family Trust. Plaintiff therefore designates DOE 1 as the presently unknown person or persons acting as trustee of the Wong Family Trust and will amend this pleading when the proper identity and capacity are reliably established.

14. County enforcement records identify the Wong Family Trust as the ownership interest associated by the County with the disputed neighboring property. Plaintiff has communicated with a person identified to her as Louie Wong concerning the property dispute, but Plaintiff does not presently know or allege that Louie Wong is a trustee.

15. Plaintiff is ignorant of the true names and capacities of DOES 2 through 10 and therefore sues those Defendants by fictitious names. Plaintiff will amend this Complaint when their identities and capacities become known.

III. JURISDICTION AND VENUE

16. This Court has jurisdiction over this unlimited civil action and authority to grant declaratory and appropriate equitable relief under Code of Civil Procedure sections 1060 and 525 et seq.

17. Venue is proper in Kern County because the real property and physical possessions at issue are located in Kern County, the County enforcement activity occurred or is contemplated in Kern County, and Defendant County of Kern is located in Kern County.

18. An actual controversy exists between Plaintiff and the County concerning the legal consequences of the County's present physical parcel attribution as applied to Plaintiff's possession and physical property while the ground boundary remains disputed.

19. An actual controversy also exists between Plaintiff and persons asserting rights through the Wong Family Trust because they contend Plaintiff and her possessions are physically situated on their property and have demanded removal.

IV. FACTUAL ALLEGATIONS

A. PURCHASE OF THE PROPERTY AND DEED ERROR

20. Before purchasing the property, Plaintiff took steps to identify the Rosamond parcel and the physical land being offered for sale, including seeking information concerning its location and boundaries. Plaintiff specifically sought to avoid purchasing or occupying land that encroached upon neighboring property.

21. Plaintiff purchased the property in April 2025 and took possession of the physical location she understood to be the land conveyed to her.

22. Plaintiff's original Grant Deed was recorded on April 17, 2025.

23. At the time of purchase, Plaintiff was unaware that the recorded Grant Deed omitted the grantee.

24. Plaintiff did not discover the recording defect until approximately January 2026.

25. Plaintiff thereafter retained and paid legal counsel to correct the deed, and a corrective Grant Deed was recorded in March 2026.

26. The corrected Grant Deed identifies the property conveyed to Plaintiff as Parcel 5 of Record of Survey Map No. 2050, filed May 12, 1958, in Book 7, Page 71 of Records of Survey, and identifies APN 252-151-04-00.

27. Plaintiff does not allege that the APN notation or deed, standing alone, establishes every physical boundary line on the ground. The deed identifies the property conveyed to Plaintiff and provides a recorded basis from which its physical boundaries may be located.

28. During her occupancy, Plaintiff has maintained an RV, shipping containers containing substantial personal belongings, trees, infrastructure, and other property at the physical location she understood to be the property conveyed to her.

29. Plaintiff has also pursued an address and permits necessary to develop and use the property, including through Kern County processes associated with the property.

30. Plaintiff purchased the property in part to create a permanent and stable future residence for her adult son Jacob, for whom Plaintiff is the court-appointed conservator, and his caregivers. Jacob does not presently reside on the property. Plaintiff does not contend that her conservatorship or Jacob's circumstances exempt the property from applicable land-use, permitting, or Code Compliance requirements.

B. KERN COUNTY'S FIRST CODE COMPLIANCE MATTER

31. On or about January 27, 2026, Kern County Code Compliance issued a 30-Day Notice and Order in Case No. C083442 concerning the physical location occupied by Plaintiff.

32. The notice identified Plaintiff's predecessor in title, Heidi Morsheda, rather than Plaintiff.

33. Code Compliance Officer Isaac Garcia personally came to the physical location occupied by Plaintiff and hand-delivered the notice to Plaintiff.

34. During that encounter, Garcia did not advise Plaintiff that the County considered her to be physically occupying APN 252-151-13 or property belonging to the Wong Family Trust.

35. Plaintiff remained at the same physical location after that encounter.

36. Kern County subsequently acknowledged that its first Code Compliance matter had concerned the wrong property and closed that case.

37. Plaintiff does not contend that the first Code Compliance notice constitutes a boundary survey or conclusively establishes the physical boundary. It is relevant because the County initially attributed the same occupied physical location to a different parcel than the parcel to which the County later attributed that location.

C. AUGUST 4, 2026 NOTICE AND SECOND CODE COMPLIANCE MATTER

38. On August 4, 2026, Kern County Code Compliance Officer Roland Lopez personally came to the physical property occupied by Plaintiff and hand-delivered to Plaintiff a 30-Day Notice and Order to Abate in Case No. C085192.

39. Unlike the first notice, which identified Plaintiff's predecessor in title, the August 4 notice was addressed to the WONG FAMILY TRUST, not Plaintiff, and concerned property the County presently attributes to the Wong Family Trust.

40. Plaintiff was not identified as the property owner or addressee on the August 4 Notice.

41. Upon reading the Notice, Plaintiff immediately told Officer Lopez, in substance, that the notice was not addressed to her.

42. Lopez then affixed the Notice to the fence at the physical location occupied by Plaintiff and photographed the posted Notice.

43. After photographing the posted Notice, Lopez removed it from the fence and handed it to Plaintiff.

44. Plaintiff remained at the same physical location at which the first Code Compliance notice had been personally delivered to her earlier that year.

45. Plaintiff therefore received two separate Kern County Code Compliance notices at the same physical occupied location during 2026, neither of which identified Plaintiff as the property owner or addressee: the first identified her predecessor in title, Heidi Morsheda, and the second identified the Wong Family Trust.

46. Plaintiff herself was the recorded owner of the property conveyed to her as Parcel 5 and identified in her corrected Grant Deed as APN 252-151-04-00.

47. Plaintiff was therefore confronted with three different ownership identities in connection with the same ongoing property and parcel problem: Plaintiff as the recorded owner of the property conveyed to her; Heidi Morsheda on the first Code Compliance notice delivered at Plaintiff's occupied location; and the Wong Family Trust on the second Notice delivered there.

48. Plaintiff had not moved her RV, shipping containers, belongings, or occupied area between the County's first and second Code Compliance matters.

49. Because the August 4 Notice was addressed to the Wong Family Trust rather than Plaintiff, Plaintiff did not understand the Notice at the time to be an administrative order issued against her in her capacity as the property owner.

50. Plaintiff did not pursue an administrative appeal from the August 4 Notice.

51. Plaintiff nevertheless continued communicating with Kern County concerning the underlying property and parcel dispute.

52. Kern County subsequently explained that the first Code Compliance case had been closed after the County concluded that it concerned the wrong property and that the second case was opened because the County had determined that Plaintiff's physical location was instead on property attributed to the Wong Family Trust.

53. Neither Code Compliance notice constitutes a licensed boundary survey or independently establishes the physical location of the boundary between the two parcels.

D. AUGUST 17, 2026 PROPERTY ENCOUNTER

54. On August 17, 2026, Kern County Sheriff's deputies, Kern County Code Compliance Officer Roland Lopez, and three persons associated with the Wong ownership claim came to the disputed physical location.

55. Plaintiff was initially advised, in substance, that the Sheriff's deputies and Code Compliance officer were present to keep the peace.

56. A Wong-associated person identified to Plaintiff as Louie Wong told Plaintiff that they were there to ask Plaintiff to vacate what they considered to be Wong property.

57. Plaintiff explained the deed recording error and the property and County issues she had been attempting to resolve.

58. Plaintiff and Louie Wong discussed the situation for approximately ten to fifteen minutes.

59. During the conversation, Louie Wong asked how the County determined which physical parcel belonged to a particular owner. Plaintiff looked to Officer Lopez and indicated that he should answer that question.

60. Plaintiff recalls that, on more than one occasion during the encounter, Lopez pointed generally toward neighboring property north and east of Plaintiff's occupied location and stated, in substance, that Plaintiff's parcel was located there.

61. Plaintiff was not shown a licensed boundary survey, surveyed monuments, measurements, survey stakes, or other professional ground-boundary evidence during that encounter.

62. Plaintiff does not allege that no such information existed. Plaintiff alleges only that none was shown to her during that encounter.

63. Plaintiff and Louie Wong exchanged contact information, and Plaintiff agreed to provide documentation concerning her deed and parcel.

64. As Plaintiff began walking away, another Wong-associated woman spoke with a Sheriff's deputy and then told Plaintiff words to the effect, "We can have you arrested for trespassing."

65. Plaintiff recalls the woman repeating the trespass-and-arrest statement as Plaintiff continued walking away.

66. Plaintiff was not arrested during the August 17 encounter.

67. Plaintiff does not allege that the woman's statement itself established that an arrest would have been legally authorized.

68. The incident nevertheless materially escalated the practical consequences of the unresolved boundary dispute and caused Plaintiff to understand that persons asserting ownership of the disputed location might seek additional law-enforcement involvement concerning Plaintiff's continued possession.

69. Plaintiff subsequently provided Louie Wong documentation concerning her deed and parcel position.

70. On or about August 28, 2026, Louie Wong asserted in writing that Plaintiff was trespassing on the family's land and demanded that Plaintiff remove herself and her belongings.

71. Plaintiff does not allege that this communication alone establishes that the Wong parties intend unlawfully to seize Plaintiff's belongings. It establishes an existing adverse claim concerning possession of the disputed physical location and an express demand that Plaintiff and her property leave.

E. SEPTEMBER 3 COUNTY MEETING AND GIS/BOUNDARY QUESTION

72. On September 3, 2026, Plaintiff participated in a meeting with Kern County management personnel in an effort to understand and resolve the parcel and boundary dispute.

73. During that meeting, County personnel acknowledged, in substance, that the first Code Compliance matter had involved the wrong property and had been closed.

74. County personnel also confirmed that Plaintiff owns APN 252-151-04-00.

75. County personnel nevertheless maintained that Plaintiff's RV, shipping containers, belongings, and occupied physical location are situated on APN 252-151-13.

76. Plaintiff specifically asked how the parcel lines reflected in the County's GIS were established and what supported the County's conclusion concerning Plaintiff's physical location.

77. County personnel explained, in substance, that parcel-line information appearing in GIS is entered based upon recorded maps and that ownership information is obtained through County records and may not update immediately.

78. County personnel recommended that Plaintiff retain a private licensed surveyor to determine and mark her property lines.

79. Plaintiff asked what would occur if a licensed surveyor determined that Plaintiff was already situated on the parcel she owns.

80. County personnel responded, in substance, that such a survey result would require a "different conversation."

81. During the same meeting, County personnel stated that County abatement was not imminent that day, the next day, or within approximately the following week, and explained that additional notice and process would precede removal or towing of Plaintiff's property.

82. County personnel further explained that before certain property could be towed or removed, it would first have to be tagged, which would begin an additional notification period.

83. Plaintiff does not allege that Kern County threatened immediate same-day abatement during the September 3 meeting.

84. County personnel also stated that the County could not prevent persons associated with the Wong Family Trust from contacting law enforcement or independently pursuing their asserted private property rights.

85. County personnel further explained that moving Plaintiff's belongings to the location the County presently identifies as APN 252-151-04-00 would not necessarily eliminate separate Code Compliance issues concerning permitted primary use.

86. Plaintiff does not seek through this action to avoid those separate lawful permitting, land-use, or Code Compliance requirements.

F. COUNTY GIS LIMITATIONS AND THE LICENSED SURVEY

87. Plaintiff continued seeking clarification concerning the factual basis for the County's physical parcel determination.

88. Plaintiff asked Kern County Public Works Director Joshua Champlin to identify the recorded source underlying the County GIS boundary information relevant to the dispute.

89. Director Champlin subsequently explained, in substance, that the parcel lines depicted in the County's GIS are not legal boundary lines and are used for geographic-information purposes, and indicated that a licensed survey would provide the most accurate information concerning the physical boundary.

90. Plaintiff does not allege that Champlin's response proves that Plaintiff is necessarily physically occupying APN 252-151-04-00. His response is relevant because it confirms that the GIS parcel line itself is not a legal boundary line and that a licensed survey is materially relevant to determining the physical boundary.

91. Plaintiff retained licensed land surveyor Mark Wittig to professionally determine and mark the physical boundary.

92. The survey is presently scheduled for October 12, 2026.

93. Plaintiff has requested an earlier appointment if the surveyor receives a cancellation opening.

94. Plaintiff is willing to cooperate fully in obtaining the survey and promptly addressing its results.

G. PLAINTIFF REQUESTED PRESERVATION PENDING THE SURVEY

95. After retaining the surveyor, Plaintiff notified County personnel of the scheduled survey and expressly requested that parcel-dependent enforcement be held until the survey could be completed.

96. Plaintiff explained that she wanted to determine reliably which parcel she physically occupied before moving substantial quantities of personal and other property.

97. Plaintiff also communicated with County personnel, including Jacob Clayton and Officer Roland Lopez, concerning the pending survey and requested that parcel-dependent enforcement be temporarily held pending its completion.

98. County management subsequently advised Plaintiff in writing that the County was prepared to wait until Plaintiff returned from Texas before requesting access to the property for tagging.

99. Plaintiff is presently scheduled to return to California on September 22, 2026.

100. The licensed survey is presently scheduled for October 12, 2026, approximately twenty days after Plaintiff's scheduled return to California.

101. Plaintiff therefore understands from the County's written communication that her return to California, rather than completion of the licensed survey, may mark the point at which the County proceeds with its next parcel-dependent enforcement step.

102. Plaintiff has not received the unequivocal written assurance she requested that parcel-dependent tagging or other enforcement will be held until the licensed survey is completed.

103. Plaintiff attempted to obtain voluntary temporary preservation from the County before seeking emergency judicial relief.

H. LIMITED CONTEXT OF THE ORIGINAL CODE COMPLIANCE COMPLAINT

104. Records in Plaintiff's possession identify Mari Rotella as the person who made the complaint that initiated Kern County Code Compliance involvement concerning Plaintiff's occupied property.

105. Plaintiff also possesses written communications reflecting subsequent exchanges between Rotella and County Code Compliance personnel concerning Code Compliance enforcement, timing, and the status of the property.

106. Plaintiff does not seek relief against Rotella in this action and does not ask this Court to determine whether those communications were improper.

107. These facts are alleged only as limited context concerning the chronology and development of Code Compliance involvement preceding the County's presently disputed physical parcel-location determination.

I. PURPOSE OF THE PROPERTY AND IRREPARABLE HARM

108. Plaintiff is the court-appointed conservator of her 32-year-old adult son, Jacob.

109. Jacob does not presently reside on the Rosamond property.

110. One of Plaintiff's central purposes in purchasing and developing the property is to establish a permanent and stable future residence for Jacob and his caregivers.

111. Any contemplated future use of the property remains subject to all applicable land-use, building, zoning, permitting, and other governmental requirements.

112. Plaintiff does not allege that her status as conservator or Jacob's circumstances create an exemption from applicable governmental requirements. These facts are alleged to explain Plaintiff's purpose in acquiring and developing the property and the practical and equitable consequences of displacement or loss.

113. Plaintiff's RV, shipping containers, substantial personal belongings, trees, infrastructure, and other property presently remain at the disputed physical location.

114. Relocating those items would require substantial labor, transportation, expense, and physical disturbance of the existing conditions before the licensed boundary determination is completed.

115. If Plaintiff moves substantial property to the location the County presently identifies as APN 252-151-04-00 and the licensed survey later establishes a materially different boundary, Plaintiff could face the expense and disruption of another substantial relocation.

116. Plaintiff's shipping containers contain significant personal possessions, including unique family heirlooms, historic books, family records, and other property that cannot simply be replaced by an award of money if lost, destroyed, dispersed, or materially damaged.

117. Money cannot recreate a destroyed family heirloom or necessarily recover unique historic and personal property once it has been lost or dispersed.

118. Removal or disturbance of planted trees, infrastructure, containers, and other physical conditions could also materially alter the existing site before the professional boundary determination is completed.

119. The prior August 17 encounter and subsequent written demand concerning trespass create a separate risk of additional law-enforcement involvement arising from the unresolved physical-location question.

120. Preserving existing physical conditions for the limited period necessary to obtain and consider the already-scheduled licensed survey would avoid potentially irreversible consequences while leaving all parties free thereafter to assert their respective property, land-use, enforcement, and other legal rights.

121. During any temporary preservation period, Plaintiff is willing to refrain from new construction or material alteration of the disputed occupied area, cooperate with the licensed survey, and promptly disclose and address the survey results as directed by the Court.

V. FIRST CAUSE OF ACTION DECLARATORY RELIEF (Code Civ. Proc., § 1060) — Against All Defendants as Applicable

122. Plaintiff incorporates paragraphs 1 through 121 as though fully set forth herein.

123. An actual controversy presently exists concerning the parties' respective rights and duties arising from the disputed physical location of Plaintiff's property and possessions.

124. Kern County acknowledges that Plaintiff owns APN 252-151-04-00 but presently maintains that Plaintiff's occupied physical location and possessions are situated on APN 252-151-13, which the County attributes to the Wong Family Trust.

125. Persons asserting rights through the Wong Family Trust contend that Plaintiff and her belongings are physically located on their property and have demanded that Plaintiff remove herself and her belongings.

126. Plaintiff disputes the County's present physical-location determination and has retained a licensed surveyor to professionally determine and mark the physical boundary between the parcels.

127. The County has recommended that Plaintiff obtain a licensed survey to determine and mark the property lines, and County personnel have acknowledged that the parcel lines depicted in the County's GIS are not themselves legal boundary lines.

128. Plaintiff seeks a judicial declaration concerning the parties' respective rights and duties while the physical boundary remains unresolved, including whether parcel-dependent enforcement, removal, towing, impoundment, or dispossession of Plaintiff or her property may proceed based upon the presently disputed parcel attribution before the physical boundary is reliably established through the licensed survey or other competent evidence.

129. Plaintiff does not ask this Court, before competent boundary evidence is available, to declare that her presently occupied location is necessarily situated within APN 252-151-04-00.

130. Pending a reliable determination of the physical boundary and further proceedings, Plaintiff separately seeks temporary equitable relief preserving existing physical conditions so that the controversy is not effectively resolved through removal, impoundment, dispossession, or other irreversible physical action before competent boundary evidence is available.

131. Declaratory relief is necessary because the disputed physical parcel attribution presently affects County enforcement activity, Plaintiff's possession and property, and competing claims concerning possession of the disputed physical location asserted by persons associated with the Wong Family Trust.

VI. ALLEGATIONS SUPPORTING TEMPORARY, PRELIMINARY, AND PERMANENT INJUNCTIVE RELIEF

132. Plaintiff incorporates paragraphs 1 through 131 as though fully set forth herein.

133. Plaintiff seeks injunctive relief as a remedy ancillary to the actual controversy alleged above and not as a separate substantive cause of action.

134. Unless appropriate temporary relief is granted, parcel-dependent governmental enforcement or private interference could materially alter existing physical conditions before the licensed survey supplies competent evidence concerning the physical boundary.

135. Towing, impoundment, removal, disposal, material relocation, interference with Plaintiff's containers and belongings, or physical dispossession could alter Plaintiff's possession and property in ways that later monetary relief would not adequately restore.

136. Plaintiff's unique family heirlooms, historic books, records, and other unique possessions cannot simply be recreated through money damages if destroyed, lost, dispersed, or materially damaged.

137. Plaintiff seeks only narrowly tailored relief directed to governmental enforcement or private action materially dependent upon the presently disputed physical parcel attribution.

138. Plaintiff does not seek to prohibit Kern County from responding to a genuine immediate health or safety emergency or from enforcing requirements that operate independently of resolution of the disputed physical parcel location.

139. Plaintiff is prepared during an appropriate temporary preservation period to refrain from new construction or material alteration of the disputed occupied area, cooperate fully with the licensed survey, and promptly provide and address the survey results.

140. The requested preservation period is limited. Plaintiff's survey is already contracted and presently scheduled for October 12, 2026, subject to an earlier cancellation opening.

141. The balance of temporary hardship favors preservation because maintaining existing physical conditions for the limited period necessary to obtain competent boundary evidence would leave Defendants' ultimate rights intact, while potentially irreversible physical action before the survey could substantially impair Plaintiff's property and possession.

142. Plaintiff therefore seeks temporary, preliminary, and, if warranted after adjudication, permanent injunctive relief sufficient to prevent irreversible alteration of the disputed physical conditions before the parties' rights can be determined through competent evidence and legal process.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff JULIE FACKRELL respectfully requests that the Court grant judgment and relief as follows:

1. For a declaration of the parties' respective rights and duties concerning the disputed physical parcel location, Plaintiff's possession and property, and the legal consequences of the boundary determination as established through the licensed survey and other competent evidence;

2. For temporary and preliminary relief preserving existing physical conditions pending completion and prompt consideration of the licensed boundary survey;

3. Pending further order of the Court, for narrowly tailored restraint against towing, impounding, removing, seizing, disposing of, materially relocating, or physically dispossessing Plaintiff of her RV, shipping containers, personal belongings, trees, infrastructure, improvements, or other property to the extent such action is materially dependent upon Kern County's presently disputed determination that Plaintiff's occupied physical location is APN 252-151-13 rather than APN 252-151-04-00;

4. For appropriate temporary restraint against the properly identified trustee or trustee(s) of the Wong Family Trust, and any person acting on their behalf with actual notice of the Court's order, from removing, disposing of, seizing, materially relocating, taking possession of, or materially interfering with Plaintiff's personal property before the disputed physical boundary can be determined and the parties heard;

5. For an order expressly preserving Kern County's authority to respond to genuine immediate health-and-safety conditions and to enforce requirements that operate independently of resolution of the disputed physical parcel location;

6. For declaratory and preliminary or permanent injunctive relief as warranted after the parties have had an opportunity to present competent boundary evidence;

7. For allowable costs of suit; and

8. For such other and further relief as the Court deems just and proper.

Dated: September 21, 2026

JULIE FACKRELL 

Plaintiff in Propria Persona

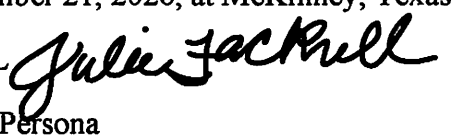
VERIFICATION

I, Julie Fackrell, am the Plaintiff in this action. I have read the foregoing Complaint and know its contents.

The factual matters stated therein are true of my own personal knowledge except as to matters stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 21, 2026, at McKinney, Texas.

JULIE FACKRELL 

Plaintiff in Propria Persona

ATTORNEY OR PARTY WITHOUT ATTORNEY
NAME: Julie Fackrell
FIRM NAME:
STREET ADDRESS: 1950 W Rosamond Blvd., unit 430
CITY: Rosamond STATE: CA ZIP CODE: 93560
TELEPHONE NO.: 805-293-0830 FAX NO.:
EMAIL ADDRESS: julie_fackrell@yahoo.com
ATTORNEY FOR (name): Plaintiff Julie Fackrell, In Propria Persona

STATE BAR NUMBER:

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ELECTRONICALLY FILED
Superior Court of California,
County of Kern
By: Javen Silva
Deputy Clerk
09/21/26 8:43 PM

SUPERIOR COURT OF CALIFORNIA, COUNTY OF KERN
STREET ADDRESS: 1215 Truxtun Avenue
MAILING ADDRESS: 1215 Truxtun Avenue
CITY AND ZIP CODE: Bakersfield, CA 93301
BRANCH NAME: Metropolitan Division — Justice Building

CASE NAME: Fackrell v. County of Kern, et al.

CASE NUMBER: 26CUB03736

JUDGE:
DEPT.:

CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds $35,000)
☐ **Limited** (Amount demanded is $35,000 or less)

Complex Case Designation

☐ Counter ☐ Joinder

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1–6 below must be completed (see instructions on page 2 and examples on page 3).

1. Check **one** box below for the case type that best describes this case:

Auto Tort
- ☐ Auto (22)
- ☐ Uninsured motorist (46)

Asbestos
- ☐ Asbestos (04)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
- ☐ Product liability (24)
- ☐ Medical malpractice (45)
- ☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort
- ☐ Business tort/Unfair business practice (07)
- ☐ Civil rights (08)
- ☐ Defamation (13)
- ☐ Fraud (16)
- ☐ Intellectual property (19)
- ☐ Professional negligence (25)
- ☐ Other non-PI/PD/WD tort (35)

Employment
- ☐ Wrongful termination (36)
- ☐ Other employment (15)

Contract
- ☐ Breach of contract/warranty (06)
- ☐ Song-Beverly Act: Motor Vehicle Lemon Law (49)
- ☐ Rule 3.740 collections (09)
- ☐ Other collections (09)
- ☐ Insurance coverage (18)
- ☐ Other contract (37)

Real Property
- ☐ Eminent domain/Inverse condemnation (14)
- ☐ Wrongful eviction (33)
- ☐ Other real property (26)

Unlawful Detainer
- ☐ Commercial (31)
- ☐ Residential (32)
- ☐ Drugs (38)

Judicial Review
- ☐ Asset forfeiture (05)
- ☐ Petition re arbitration award (11)
- ☐ Writ of mandate (02)
- ☐ Other judicial review (39)

Employment Development Department (EDD)
- ☐ EDD decision review (48)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.404)
- ☐ Antitrust/Trade regulation (03)
- ☐ Construction defect (10)
- ☐ Mass tort (40)
- ☐ Securities litigation (28)
- ☐ Environmental/Toxic tort (30)
- ☐ Comprehensive groundwater adjudication (47)
- ☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment
- ☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint
- ☐ RICO (27)
- ☒ Other complaint *(not specified above)* (42)

Miscellaneous Civil Petition
- ☐ Partnership and corporate governance (21)
- ☐ Other petition *(not specified above)* (43)

2. Is this case complex under rule 3.400 of the California Rules of Court? ☐ Yes ☒ No
   If the case is complex, mark the factors requiring exceptional judicial management:
   a. ☐ Large number of separately represented parties
   b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
   c. ☐ Substantial amount of documentary evidence
   d. ☐ Large number of witnesses
   e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
   f. ☐ Substantial postjudgment judicial supervision
3. Remedies sought *(check all that apply):*
   a. ☐ monetary
   b. ☒ nonmonetary; declaratory or injunctive relief
   c. ☐ punitive
4. Number of causes of action *(specify):* 1
5. Is this case a class action suit? ☐ Yes ☒ No
6. If there are any known related cases, file and serve a notice of related case. *(You may use form CM-015.)*

Date: September 21, 2026

Julie Fackrell
Type or print name

Julie Fackrell
Signature of party or attorney for party

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, or a collections case under rule 3.740, you must serve a copy of this cover sheet on all other parties to the action or proceeding. (Cal. Rules of Court, rule 3.220.)
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on pages 1 and 2. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided on page 3 of this form. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 of the California Rules of Court is defined as an action for recovery of money owed in a sum stated to be certain that is not more than $35,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

SEE PAGE 3 FOR INFORMATION PURPOSES ONLY.

CASE TYPES AND EXAMPLES

The list below provides explanations and examples for the case type checkboxes listed in item 1 on this form. The lists of examples below are not meant to be exhaustive, and some case types may have causes of action not listed here.

Auto Tort
- Auto (22)–Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)* (46)

Asbestos
- Asbestos (04)
  - Asbestos Property Damage
  - Asbestos Personal Injury/Wrongful Death

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
- Product Liability *(not asbestos or environmental/toxic tort)* (24)
- Medical Malpractice (45)
  - Medical Malpractice–Physicians & Surgeons
  - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
  - Premises Liability (e.g., slip and fall)
  - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
  - Intentional Infliction of Emotional Distress
  - Negligent Infliction of Emotional Distress
  - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort
- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
- Defamation (e.g., slander, libel) (13)
- Fraud *(other than contract)* (16)
- Intellectual Property (19)
- Professional Negligence (25)
  - Legal Malpractice
  - Other Professional Malpractice *(not medical)*
- Other Non-PI/PD/WD Tort (35)

Employment
- Wrongful Termination (36)
- Other Employment (15)

Contract
- Breach of Contract/Warranty (06)
  - Breach of Rental/Lease Contract *(not unlawful detainer or wrongful eviction)*
  - Contract/Warranty Breach–Seller Plaintiff *(not fraud)*
  - Negligent Breach of Contract/Warranty
  - Other Breach of Contract/Warranty
- Song-Beverly Act: Motor Vehicle Lemon Law *(check this item if the case involves a Song-Beverly Act claim regarding a motor vehicle)* (49)
- Rule 3.740 Collections *(as defined in Cal. Rules of Court, rule 3.740(a))* (09)
- Other Collections (e.g., money owed, open book accounts, promissory note) (09)
- Insurance Coverage *(not provisionally complex)* (18)
  - Auto Subrogation
  - Other Coverage
- Other Contract (37)
  - Contractual Fraud
  - Other Contract Dispute

Real Property
- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
  - Writ of Possession of Real Property
  - Mortgage Foreclosure
  - Quiet Title
  - Other Real Property *(not unlawful detainer)*

Unlawful Detainer
- Commercial (31)
- Residential (32)
- Drugs *(if the case involves illegal drugs, check this item; otherwise, choose Commercial or Residential)* (38)

Judicial Review
- Asset Forfeiture (05)
- Petition re Arbitration Award (11)
- Writ of Mandate (02)
  - Writ–Administrative Mandamus
  - Writ–Mandamus on Limited Court Case Matter
  - Writ–Other Limited Court Case Review
- Other Judicial Review (39)
  - Review of Health Officer Order
  - Notice of Appeal–Labor Commissioner Appeals

Employment Development Department (EDD)
- EDD Decision Review *(if the case involves an Employment Development Department decision, check this item instead of wrongful termination or other employment)* (48)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.404)
- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Comprehensive Groundwater Adjudication (47)
- Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

Enforcement of Judgment
- Enforcement of Judgment (20)
  - Abstract of Judgment (Out of County)
  - Confession of Judgment *(non-domestic relations)*
  - Sister-State Judgment
  - Administrative Agency Award
  - Petition/Certification of Entry of Judgment on Unpaid Taxes
  - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint
- RICO (27)
- Other Complaint *(not specified above)* (42)
  - Declaratory Relief Only
  - Injunctive Relief Only *(non-harassment)*
  - Mechanic's Lien
  - Other Commercial Complaint Case *(non-tort/non-complex)*
  - Other Civil Complaint *(non-tort/non-complex)*

Miscellaneous Civil Petition
- Partnership and Corporate Governance (21)
- Other Petition *(not specified above)* (43)
  - Civil Harassment
  - Workplace Violence
  - Elder/Dependent Adult Abuse
  - Election Contest
  - Petition for Name Change
  - Petition for Relief From Government Claim Requirement
  - Other Civil Petition

For your protection and privacy, please press the Clear button after you have printed the form.

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