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SAVE TED – TEMECULA EQUESTRIAN
DISTRICT, INC., a California non-profit
corporation; [REDACTED]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE-Meniffee Justice Center

SAVE TED – TEMECULA
EQUESTRIAN DISTRICT, INC., a
California non-profit corporation; [REDACTED]

Plaintiffs,

vs.

SFT REALTY GALWAY DOWNS, LLC,
a California limited liability corporation;
SFT REALTY ROCKAWAY, LLC, a
California limited liability company, and
DOES 1-25, inclusive,

Defendants.

CASE NO. CVME2505581

COMPLAINT FOR:

- (1) PRIVATE NUISANCE;
- (2) PUBLIC NUISANCE;
- (3) NUISANCE PER SE; AND,
- (4) UNFAIR BUSINESS PRACTICES.

NATURE OF ACTION

1
2 1. For more than a decade, the owner of two parcels of land in the unincorporated
3 area of Riverside County (“County”) located at 38801 Los Corralitos Road, commonly referred to
4 as the Galway Downs property, has engaged in unauthorized, unpermitted and unlawful land uses
5 for financial gain on its property including, but not limited to, sporting/athletic events, weddings
6 and other large events, and other activities related thereto, and short-term rentals even though
7 such events and activities are not permitted uses under the County General Plan or the County
8 Code of Ordinances (“County Code”), nor allowed uses under previously issued permits for the
9 property.

10 2. Galway Downs (as defined below) has repeatedly, and unsuccessfully, sought
11 entitlements to allow such improper uses, so instead of obeying the law by discontinuing the
12 unpermitted uses, it has continued to engage in self-help by holding such improper uses. The
13 County of Riverside has recorded Notices of Pendency of Administrative Proceedings against the
14 Galway Downs property, copies of which are attached, and despite a cease and desist letter from
15 the County of Riverside to Galway Downs, unpermitted and unlawful land uses continue to exist
16 on the Galway Downs property. Galway Downs continues this illegal use and blatant disregard
17 of the applicable zoning restrictions and requirements all to the detriment of Save TED (as
18 defined below), its supporters and the community.

19 3. Save TED is informed and believes and based thereon alleges that these
20 unlawful/unpermitted uses and activities are a public nuisance under the County’s Code.

21 4. By holding these illegal and unpermitted activities, there has been created a
22 nuisance by, among other things, significant increases in traffic along Pauba Road, Los Caballos
23 Road, Los Corralitos Road, Highway 79, DePortola Road and Anza Road interfering with ingress
24 and egress from lands owned by supporters of Save TED, and also significant increases in noise,
25 dust, rubbish and other pollution, interfering with lawful permitted uses of Save TED supporter
26 land, and on equestrian trails, along with causing undue stress on the horses and livestock, all to
27 the detriment of Save TED, other landowners in the area, and the community as a whole. As an
28 example, the picture below shows traffic on Los Caballos Road (a two-lane road with one lane in

each direction) on the weekend of the 2025 SoCal State Cup Youngers Tournament in February 2025.



5. Save TED has been foreseeably injured by the Galway Downs owners' conduct and suffered damages as a direct and proximate result thereof.

PARTIES

6. Plaintiff Save TED –Temecula Equestrian District, Inc., is a California non-profit corporation organized and existing under the laws of California with a specific purpose to promote and preserve the unique wine and equestrian culture of Temecula, California, by supporting local viticulture, equine activities and related educational, historical, and cultural initiatives. Supporters of Save TED own property in the Equestrian District of the Riverside County General Plan's Wine Country Community Plan and/or frequently travel the roads negatively impacted by the actions or inactions of Galway Downs.

7. Plaintiff [REDACTED] is an individual who owns property within the Wine Country Community Plan's Equestrian District in close proximity to the Galway Downs property, and is a supporter of Save TED [REDACTED].

8. Plaintiff [REDACTED] is an individual who owns property within the Wine Country Community Plan's Equestrian District in close proximity to the Galway Downs property,

1 and is a supporter of Save TED [REDACTED].

2 9. Plaintiff [REDACTED] is an individual who owns property within the Wine Country
3 Community Plan's Equestrian District in close proximity to the Galway Downs property, and is a
4 supporter of Save TED [REDACTED].

5 10. Plaintiff [REDACTED] is an individual who owns property within the Wine Country
6 Community Plan's Residential District in close proximity to the Equestrian District and the
7 Galway Downs property. Due to the location of his property, he must regularly drive the public
8 roads in the area of Galway Downs, and he is a supporter of Save TED [REDACTED].

9 11. Plaintiff [REDACTED] is an individual who owns property within the Wine Country
10 Community Plan's Equestrian District in close proximity to the Galway Downs property, and is a
11 supporter of Save TED [REDACTED].

12 12. Plaintiff [REDACTED] is an individual who owns property within the Wine Country
13 Community Plan's Equestrian District in close proximity to the Galway Downs property, and is a
14 supporter of Save TED [REDACTED].

15 13. Plaintiff [REDACTED] is an individual who lives within the Wine Country
16 Community Plan's Equestrian District in close proximity to the Galway Downs property, and is a
17 supporter of Save TED [REDACTED].

18 14. Plaintiff [REDACTED] is an individual who owns property within the Wine
19 Country Community Plan and regularly drives the public roads in the area of the Galway Downs
20 property, and is a supporter of Save TED [REDACTED].

21 15. Plaintiffs Save TED –Temecula Equestrian District, Inc., [REDACTED]
22 [REDACTED] are collectively referred to herein as "Save TED" or "Plaintiffs".

23 16. Save TED is informed and believes, and based thereon alleges, that Defendant
24 SFT Realty Galway Downs, LLC, is a California limited liability company with its principal
25 place of business in Temecula, California ("SFT Realty Galway").

26 17. Save TED is informed and believes, and based thereon alleges, that Defendant
27 SFT Realty Rockaway, LLC, is a California limited liability company with its principal place of
28 business in Temecula, California ("SFT Realty Rockaway").

1 18. Defendants SFT Realty Galway, and SFT Realty Rockaway are collectively
2 referred to herein as “Galway Downs”.

3 19. Save TED is informed and believes, and based thereon alleges, the Galway Downs
4 property is located at 38801 Los Corralitos Road in unincorporated Riverside County, California,
5 which is north of Highway 79, east of Los Caballos and west of Pauba Road, and is comprised of
6 approximately 241-acres on two lots APNs 927-160-001 and 927-160-002 in the Temecula
7 Valley.

8 20. Save TED does not know the true names and capacities of the defendants named
9 as DOES 1 through 25, inclusive. Save TED is informed and believes, and based thereon alleges,
10 that the defendants designated as DOES 1 through 25, inclusive, are persons or entities in some
11 way responsible for the acts or omissions alleged, that they have some right, title or interest in the
12 subject matter of this action, or that they are otherwise required to be joined as a party in order for
13 Save TED to obtain all the relief to which it is entitled. Save TED will seek leave to amend this
14 Complaint to allege their names and capacities when ascertained.

15 21. Save TED is informed and believes, and based thereon alleges, that each
16 defendant, including the DOE defendants, was and is the agent, employee, employer, affiliate,
17 representative, alter ego, subsidiary, affiliate and/or partner of one or more of the other
18 defendants, and was, in performing the acts complained of, acting within the scope of such
19 agency, employment, or is in some other way responsible for the acts of one or more of the
20 defendants.

21 **JURISDICTION AND VENUE**

22 22. This Court has jurisdiction over this matter because the actions forming the
23 allegations contained herein occurred within the County of Riverside.

24 23. Venue is appropriate in this Court under Riverside County Superior Court Local
25 Rule 3115 and the Superior Court’s Administrative Order dated March 7, 2025, in that the actions
26 complained of concern real property located in zip code 92592 and the actions arose and
27 occurred, and/or are occurring in that zip code.

GENERAL ALLEGATIONS

A. The Wine Country Community Plan

24. In or about 2008, the Riverside County Board of Supervisors initiated the Temecula Valley Wine Country Community Plan (“WCCP”) to ensure that the region developed in an orderly manner and to preserve and enhance its viticulture potential, rural lifestyle and equestrian activities.

25. After numerous public meetings and consideration by the County’s Planning Commission, the Board of Supervisors approved and adopted the WCCP in 2014 as General Plan Amendment No. 1077 and added the WCCP as Appendix Q of the Riverside County General Plan. As noted at the initiation of the plan, the point and purpose of the WCCP was, and is, to ensure the long-term viability of the wine industry while protecting the community’s equestrian and rural lifestyle.

26. Among other things, as part of the approval, the Board of Supervisors also amended Zoning Ordinance No. 348 to add four new Zoning Classifications to the County’s zoning code: “Wine Country – Winery”; “Wine Country – Winery Existing”; “Wine Country – Residential”; and “Wine Country – Equestrian.”

27. Save TED is informed and believes, and based thereon alleges, that the purpose of these zones is to implement the WCCP and encourage agricultural cultivation, vineyards, wineries, equestrian uses, preserve the wine-making atmosphere, estate living, equestrian lifestyle, and protect this area and its residents from incompatible uses which could result in reduced agricultural productivity and increased urbanization within the area.

28. Save TED is informed and believes, and based thereon alleges, that the Wine Country-Equestrian District generally encompasses the area formerly recognized as the Valle de Los Caballos Policy Area of the County and its purpose is to protect and promote equestrian uses while encouraging equestrian establishments that promote the equestrian lifestyle as described in the Wine Country Equestrian Zone.

29. Save TED is informed and believes, and based thereon alleges, that the Galway Downs property is zoned Wine Country Equestrian (“WC-E”).

1 30. Save TED is informed and believes, and based thereon alleges, that commercial
2 temporary events as defined by County Code, section 17.256.020, subdivision (I), are prohibited
3 on lots zoned WC-E. (County Code, § 17.256.030, subd. (E).)

4 31. Save TED is informed and believes, and based thereon alleges, that an application
5 for a temporary event permit shall not be processed and shall be summarily denied in certain
6 circumstances, including where the County has received five separate substantiated complaints
7 for the subject location within the last twelve months from application submittal date related to
8 noise, odors, traffic, parking or rubbish. (County Code, §§ 17.256.060, subd. (2) & 17.256.070,
9 subd. (2).)

10 32. Save TED is informed and believes, and based thereon alleges, that off-site
11 parking on unpaved sites is only allowed if there is an access and parking plan approved by the
12 County Transportation Director and the County Fire Chief or their respective designees. Off-site
13 parking on unpaved sites also requires an approved dust mitigation plan and a site restoration
14 plan. (County Code, § 17.256.070 subd. (3).)

15 33. Save TED is informed and believes, and based thereon alleges, that a temporary
16 event permit additionally requires a fire protection plan; security operations plan; emergency
17 medical services plan; sewage disposal, potable water and food service operation plan; and a
18 noise, dust and lighting mitigation plan. (County Code, § 17.256.070 subd. (4), (6)-(9).)

19 34. Save TED is informed and believes, and based thereon alleges, that the County
20 additionally adopted the Wine Country Equestrian District zone to permit incidental commercial
21 uses such as western style stores, polo-grounds, or horse racing tracks, petting zoos, event
22 grounds, horse show facilities, animal hospitals, restaurants, delicatessens, and special occasion
23 facilities in conjunction with commercial equestrian establishments on lots larger than 10 acres to
24 encourage equestrian tourism in this community.

25 35. Save TED is informed and believes, and based thereon alleges, that Galway
26 Downs is located within the WCCP and, more specifically, in the Wine Country-Equestrian
27 district.

28 36. Save TED is informed and believes, and based thereon alleges, that the County's

Code allows certain uses in the Wine Country Equestrian District, but prohibits the athletic/sporting events and other uses that regularly occur at the Galway Downs property.

37. Save TED is informed and believes, and based thereon alleges, that under certain circumstances the County's Code conditionally authorizes certain uses in the Wine Country Equestrian District provided a plot plan has first been approved by the County, but that such uses do not include the athletic/sporting events and other uses that regularly occur at the Galway Downs property.

38. Save TED is informed and believes, and based thereon alleges, that under certain circumstances the County's Code conditionally authorizes certain uses in the Wine Country Equestrian District provided that a conditional use permit has first been approved by the County, but that such uses do not include the athletic/sporting events and other uses that regularly occur at the Galway Downs property.

39. Save TED is informed and believes, and based thereon alleges, that Galway Downs is and has been violating all of the aforementioned County laws or regulations.

B. The Land Uses at the Galway Downs Property

40. Save TED is informed and believes, and based thereon alleges, that Galway Downs purchased the property in or about 2010 and that the property at that time was designated Rural Residential -5 Acre Minimum in the General Plan, was part of the Valle De Los Caballos Policy Area in the Southwest Area Plan, and was zoned Residential Agricultural – 10 Acre Minimum.

41. Save TED is informed and believes, and based thereon alleges, that the County created the Valle De Los Caballos Policy Area in the Southwest Area Plan to foster a very low intensity rural lifestyle with an equestrian focus.

42. Save TED is informed and believes, and based thereon alleges, that prior to purchasing the property, Galway Downs was made aware of the Southwest Area Plan and developing WCCP, and the fact that athletic/sporting events were not allowed, and would not be allowed, under the County's General Plan and County Code. Save TED is informed and believes, and based thereon alleges, that Galway Downs submitted comments on the County's draft WCCP

1 and was aware of the fact that under both the then-current zoning and proposed WCCP equestrian
2 district designation, athletic/sporting events were not allowed under the County's Code, and that
3 Galway Downs did not legally challenge the County's approval of the WCCP

4 43. Nonetheless, Save TED is informed and believes, and based thereon alleges, that
5 in 2011, Galway Downs sought a Plot Plan from the County to convert acreage of the property for
6 it to operate a sports/athletic facility with fields for soccer, lacrosse and other sports.

7 44. Save TED is informed and believes, and based thereon alleges, that in conjunction
8 with the application for the athletic/sporting events Plot Plan, in 2011 the California Department
9 of Transportation reviewed a traffic assessment commissioned by Galway Downs commenting,
10 among other things, that:

- 11 a. Intersections along State Route 79 that would be potentially impacted
12 included Butterfield Stage Road and Temecula Parkway; Anza Road and
13 SR-79; Los Caballos Road and SR-79; and Pauba Road and SR-79;
- 14 b. The level of service for the intersection of Los Caballos Road and SR-79
15 would be LOS F, such that the project must improve this intersection by
16 the addition of a left turn lane on eastbound SR-79 going north to Los
17 Caballos Road; and,
- 18 c. The additional traffic generated by the proposed project may increase the
19 probability of accidents and state liability on SR-79 if no improvements are
20 implemented as part of the project.

21 45. Save TED is informed and believes, and based thereon alleges, that in January
22 2012, before an appeal of the Plot Plan could be heard and considered by the Board of
23 Supervisors, Galway Downs withdrew its application.

24 46. Save TED is informed and believes, and based thereon alleges, that
25 notwithstanding the withdrawal of its application in January 2012, Galway Downs proceeded
26 with athletic/sporting events as if it were a permitted and approved use.

27 47. Save TED is informed and believes, and based thereon alleges, that in or about
28 July 2013, Galway Downs sought a substantial conformance determination under the County's

1 Code to Conditional Use Permit No. 2303 for athletic/sporting events.

2 48. Save TED is informed and believes, and based thereon alleges, that Conditional
3 Use Permit No. 2303, approved in or about 1979, allowed horse racing, a boarding and training
4 facility, and a restaurant.

5 49. Save TED is informed and believes, and based thereon alleges, that a substantial
6 conformance under the County's Code is a request for a non-substantial modification of an
7 approved permit that does not change the original approval or the effect of the approval on
8 surrounding property. A substantial conformance application requires a statement explaining the
9 proposed modification and the reason the modification has been requested.

10 50. Save TED is informed and believes, and based thereon alleges, that on or about
11 November 21, 2013, Galway Downs requested that the County rescind Substantial Conformance
12 No. 1 to Conditional Use Permit No. 2303, which the County did.

13 51. Save TED is informed and believes, and based thereon alleges, that
14 notwithstanding Galway Downs' request in 2013 for rescission of the substantial conformance
15 determination, and the County's confirmation of rescission, Galway Downs proceeded with
16 athletic/sporting events as if it were a permitted and approved use.

17 52. Save TED is informed and believes, and based thereon alleges, that even though
18 the County had not approved athletic/sporting events at the property, Galway Downs proceeded
19 with athletic/sporting events as if it were a permitted and approved use.

20 53. Save TED is informed and believes, and based thereon alleges, that on or about
21 April 20, 2017, the County's Office of County Counsel delivered a letter to counsel for Galway
22 Downs explaining, again, that the County rescinded Substantial Conformance No. 1 to
23 Conditional Use Permit No. 2303 in November 2013, and that, as a result, only the uses allowed
24 under Conditional Use Permit No. 2303 may take place on the property.

25 54. Save TED is informed and believes, and based thereon alleges, that County
26 Counsel's April 20, 2017, letter unequivocally reminded Galway Downs that any substantial
27 conformance determination in 2013 had been rescinded and that the only uses allowed were those
28 granted under Conditional Use Permit 2303.

1 55. Save TED is informed and believes, and based thereon alleges, that
2 notwithstanding County Counsel's letter, Galway Downs proceeded with athletic/sporting events
3 as if they were a permitted and approved use.

4 56. Save TED is informed and believes, and based thereon alleges, that on or about
5 December 19, 2017, the County's then- Assistant TLMA Director Charissa Leach issued a
6 memorandum to Galway Downs concerning "Outlined Uses for Galway Downs" (the "2017
7 County Memorandum"). The 2017 County Memorandum addressed uses Galway Downs wished
8 to accommodate, separated into groups marked A, B, C and D: Group A represented "uses that
9 may continue to operate under Conditional Use Permit 2303" including horse events, training and
10 boarding; Group B proposed new uses that Galway Downs may propose and that such uses are
11 currently permitted under the Wine Country-Equestrian Zone including farmers markets, and
12 home and garden expositions; Group C uses were those uses "not permitted under the WC-E
13 Zone and would require a text amendment to Ordinance No. 348" including athletic/sporting
14 events defined as "Lawn games (lawn bowling, field hockey, football, soccer and cricket)
15 including games, tournaments and training" and camping/glamping; and Group D listed
16 residential uses. A true and correct copy of the County's 2017 Memorandum is attached hereto as
17 **Exhibit 1.**

18 57. Save TED is informed and believes, and based thereon alleges, that the County's
19 2017 Memorandum unequivocally reminded Galway Downs that "Group C uses [athletic/sporting
20 events] are not permitted under the WC-E Zone and will require a text amendment to Ordinance
21 No. 348."

22 58. Save TED is informed and believes, and based thereon alleges, that
23 notwithstanding the County's 2017 Memorandum Galway Downs proceeded with athletic/
24 sporting events as if they were a permitted and approved use.

25 59. Save TED is informed and believes, and based thereon alleges, that on or about
26 May 14, 2018, in conjunction with Code enforcement case CV1702804, the County's Code
27 Enforcement Department sent a Notice of Violation to Galway Downs for violations at the
28 property. A true and correct copy of this 2018 Notice of Violation is attached hereto as **Exhibit**

2.

60. Save TED is informed and believes, and based thereon alleges, that this 2018 Notice of Violation described the violations as follows:

Said violation is described as:

1) RCO No. 348 Section 3.3 and Article XIVd – Wine Country Equestrian Zone (WC-E) Zone (unpermitted land use activities) - No land, building, or structure shall be used, constructed, altered, or maintained except in conformance with the provisions of this title – **Unpermitted land use activities and violation of current land use entitlements including, but not limited to, Conditional Use Permit (“CUP”) No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303.**

1. Soccer Tournaments/Athletic Events/Sporting Events
2. Weddings
3. Corporate Events
4. Marathons
5. Obstacle challenges

61. Save TED is informed and believes, and based thereon alleges, that because of these violations this Notice of Violation explained “YOU ARE HEREBY REQUIRED TO COMPLY with the provisions of the ordinance by: (1) Discontinue illegal use(s). Obtain Riverside County Planning Department approval and comply with the approved conditions of all current land use entitlements, including, but not limited to CUP No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303.”

62. Save TED is informed and believes, and based thereon alleges, that Galway Downs did not comply with the May 2018 Notice of Violation choosing instead to proceed with (1) Soccer Tournaments/Athletic Events/Sporting Events; (2) Weddings; (3) Corporate Events; (4) Marathons; and (5) Obstacle challenges as if they were permitted and approved uses.

63. Save TED is informed and believes, and based thereon alleges, that on September 16, 2022, in conjunction with Code enforcement case CVZO220874, the County’s Code Enforcement Department recorded a Notice of Pendency of Administrative Proceedings for the continuation of unlawful uses on the property including unpermitted athletic/sporting events, wedding events, other large events and related activities, which constitute a public nuisance under the County Code because such uses are unlawful in the WC-E Zone without a valid land use permit were violations of Ord. 348 Sec. 3.3 [RCC 17.12.040] – zoning violations – Business activity not allowed; Ord. 348 Sec. 18.2(A)(2) [RCC 17.172.020(A)(2)] – zoning violation – land

1 use permit required; and Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)] – zoning violation –
2 violation of land use permit, based upon the noncompliance of such structure or land with the
3 requirements of the listed Riverside County Codes/Ordinances. A true and correct copy of this
4 Notice of Pendency of Administrative Proceedings is attached hereto as **Exhibit 3**.

5 64. Save TED is informed and believes, and based thereon alleges, that on September
6 16, 2022, in conjunction with Code enforcement case CVZO220875, the County’s Code
7 Enforcement Department recorded a Notice of Pendency of Administrative Proceedings for the
8 continuation of unlawful uses on the property including unpermitted athletic/sporting events,
9 wedding events, other large events and related activities, which constitute a public nuisance under
10 the County Code because such uses are unlawful in the WC-E Zone without a valid land use
11 permit were violations at the property of Ord. 348 Sec. 3.3 [RCC 17.12.040] – zoning violations –
12 Business activity not allowed; and Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)] – zoning
13 violation – violation of land use permit based upon the noncompliance of such structure or land
14 with the requirements of the listed Riverside County Codes/Ordinances. A true and correct copy
15 of this Notice of Pendency of Administrative Proceedings is attached hereto as **Exhibit 4**.

16 65. Save TED is informed and believes, and based thereon alleges, that on September
17 16, 2022, in conjunction with Code enforcement case CV1702804, the County’s Code
18 Enforcement Department recorded a Notice of Pendency of Administrative Proceedings at the
19 property for the continuation of unlawful uses on the property including unpermitted
20 athletic/sporting events, wedding events, other large events and related activities, which constitute
21 a public nuisance under the County Code because such uses are unlawful in the WC-E Zone
22 without a valid land use permit were violations of Ord. 348 Sec. 18.2(A)(2) [RCC
23 17.172.020(A)(2)] – zoning violation – land use permit required based upon the noncompliance
24 of such structure or land with the requirements of the listed Riverside County Codes/Ordinances.
25 A true and correct copy of this Notice of Pendency of Administrative Proceedings is attached
26 hereto as **Exhibit 5**.

27 66. Save TED is informed and believes, and based thereon alleges, that on January 3,
28 2023, as part of Code enforcement cases CVZO220874 and CVZO220875, and the failure of

Galway Downs to bring its activities into compliance, the County's Code Enforcement Department issued a cease and desist order to Galway Downs for all unpermitted and unlawful land uses and activities including athletic/sporting events, wedding events and any advertising, selling, renting, or taking reservations related to such events, as being in violation of Riverside County ordinance No. 348 (the "2023 Cease & Desist"). A true and correct copy of the 2023 Cease & Desist letter is attached hereto as **Exhibit 6**.

67. Save TED is informed and believes, and based thereon alleges, that the County's 2023 Cease & Desist letter explains:

According to County of Riverside (County) investigations, unlawful land uses and associated activities have occurred on the subject Property, including, but not limited to, unpermitted sporting and wedding and other large events and related activities, including advertising, selling, renting, taking reservations, among others, as well as all unpermitted improvements located on the subject Property.

68. Save TED is informed and believes, and based thereon alleges, that the County's 2023 Cease & Desist letter further explains:

The County considers such unlawful/unpermitted uses and activities to constitute a public nuisance due to the violation of Riverside County Ordinance (RCO) No. 348. The County has the authority to control local land uses and to regulate and ban unpermitted and unlawful activity within its jurisdiction. Wedding and sporting events, and related business activities, are unlawful in the WC-E zone without a valid land use permit issued by the County.

69. Save TED is informed and believes, and based thereon alleges, that the County's 2023 Cease & Desist letter ordered Galway Downs to immediately cease and desist all uses and activities related to unpermitted events at Galway Downs.

ACCORDINGLY, YOU ARE HEREBY ORDERED to immediately CEASE AND DESIST all uses and activities (including advertising, selling, renting, taking reservations) relating to unpermitted events at the subject Property.

70. Save TED is informed and believes, and based thereon alleges, that on or about January 28, 2023, Galways Downs requested an extension of time for compliance with the 2023 Cease & Desist in order to allow current unpermitted structures and activities to remain in

1 operation during the extension due to existing contractual obligations.

2 71. Save TED is informed and believes, and based thereon alleges, that based on
3 Galway Downs' acknowledgment and acceptance that unpermitted uses, including
4 athletic/sporting events (soccer) and special occasion events (weddings), have been occurring at
5 the property for the better part of a decade, and based on Galway Downs' acknowledgment and
6 acceptance of the County's terms and conditions related to any extension, the County granted a
7 brief extension for those activities until July 3, 2024, but that all other unpermitted uses detailed
8 in the County's 2017 Memorandum were to cease.

9 72. Save TED is informed and believes, and based thereon alleges, that the extension
10 document acknowledged and accepted by Galway Downs further explained that: (a) "occupancy
11 of any unpermitted structures will not be permitted"; (b) "absent a valid Short-Term Rental (STR)
12 Certificate this area is now part of Moratorium put in place by the Board of Supervisors.
13 Therefore, this activity must cease immediately"; and (c) Based on the recently provided Aerial
14 photographs (dated 1/7/23-attached) it is clear that the traffic and parking impacts on the
15 community are significant. A traffic control and parking plan including the CHP as referenced in
16 your EOT request must be implemented within the next 30 days."

17 73. Save TED is informed and believes, and based thereon alleges, that following
18 expiration of the extension agreement in July 2024, no further extensions have been granted by
19 the County. Nonetheless, Save TED is informed and believes, and based thereon alleges, that
20 Galway Downs continues to proceed with events and activities prohibited by the County's laws
21 and regulations and 2023 Cease & Desist as if they were a permitted and approved use.

22 74. Save TED is informed and believes, and based thereon alleges, that multiple
23 violations continue to exist and Galway Downs continues the illegal use and blatant disregard of
24 applicable land use restrictions and requirements by, among other things, continuing to regularly
25 hold unauthorized, unlawful and unpermitted athletic/sporting events on the property. Indeed,
26 Save TED is informed and believes, and based thereon alleges, that Galway Downs intends to
27 hold unauthorized, unlawful and unpermitted athletic/sporting and other events along with
28 associated activities on the property on virtually every weekend from April through August 2025

as noted in the schedule attached hereto as **Exhibit 7**.

FIRST CAUSE OF ACTION

(Private Nuisance)

Against All Defendants

75. Save TED realleges and incorporates by this reference the allegations of paragraphs 1 through 74 above.

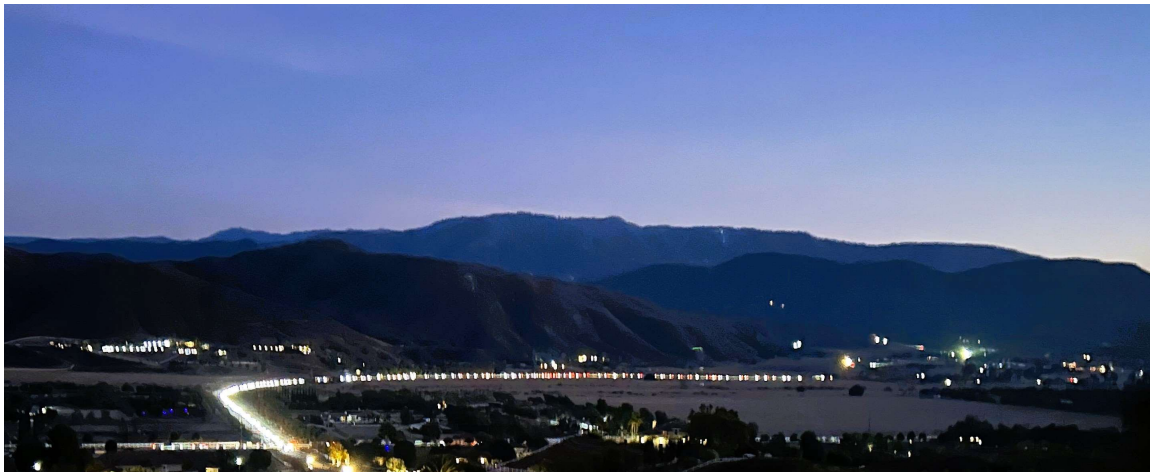
76. Save TED is informed and believes, and based thereon alleges, that Galway Downs owns, leases, occupies, and/or controls the property located at 38801 Los Corralitos Road.

77. Save TED is informed and believes, and based thereon alleges, that Galway Downs' actions and/or inactions have created a condition or permitted a condition to exist that have substantially and unreasonably interfered with Save TED's use and enjoyment of private property or a private right incidental to such private property by, among other things, vehicle traffic blocking ingress and egress to property, increasing emergency response times to private property, safety hazards resulting from cars blocking line of sight at driveways and intersections, and impairment to lawfully permitted residential uses, recreational trail uses, agricultural uses, horse and livestock uses, and incidental commercial uses resulting from noise, dust, rubbish and other pollution.

78. Galway Downs' actions and/or inactions, including but not limited to, the regular occurrence of unpermitted, unlawful and unauthorized athletic/sporting events at the property which bring thousands of vehicles by way of Pauba Road, Los Caballos Road, Los Corralitos Road, Highway 79, DePortola Road and Anza Road, unmitigated dust, rubbish and oil resulting from unauthorized vehicle driving and parking on unpaved areas on and adjacent to the Galway Downs property (including in the Temecula Creek riverbed), have created a condition that (a) is harmful to health (including on livestock and horses), (b) substantially and unreasonably obstructs Save TED's free use of property, or (c) is a fire or safety hazard or other potentially dangerous condition.

79. Save TED is informed and believes, and based thereon alleges, that Galway Downs' actions and/or inactions have created a condition or permitted a condition to exist that is

harmful to health and the environment in that the unpermitted and unauthorized athletic/sporting uses includes, among other things, traffic and other impacts of Galway Downs bringing thousands of vehicles by way of Pauba Road, Los Caballos Road, Los Corralitos Road, Highway 79, DePortola Road and Anza Road that have not been analyzed, disclosed or mitigated as required by the California Environmental Quality Act, California Public Resources Code sections 21000, et seq., or otherwise, nor have the impacts of improper parking in the Temecula Creek riverbed been analyzed, disclosed or mitigated as required by California Fish and Game Code sections 1600, et seq., and California Water Code sections 13000, et seq. For example, the pictures below show a line of cars recently leaving Galway Downs via Pauba Road, and the number of cars parked at a Galway Downs athletic/sporting event:



1 80. Save TED is informed and believes, and based thereon alleges, that Galway
2 Downs' actions and/or inactions have created a condition or permitted a condition to exist that
3 unlawfully obstructs the free passage or use of Pauba Road, Los Caballos Road, Los Corralitos
4 Road, Highway 79, DePortola Road and Anza Road and also interfering with ingress and egress
5 from lands owned by supporters of Save TED, and interfering with equestrian trials. For
6 example, the picture below shows traffic backing up on Anza Road due to an athletic/sporting
7 event at Galway Downs.



23 81. Save TED is informed and believes, and based thereon alleges, that Galway
24 Downs' actions and/or inactions have created a condition or permitted a condition to exist that
25 constitutes a fire or safety hazard by increasing fire and safety vehicle response times and
26 obstructing line of sight at intersections and driveways resulting from vehicles gridlocked along
27 Pauba Road, Los Caballos Road, Los Corralitos Road, Highway 79, DePortola Road and Anza
28

1 Road, and delaying response time for emergency vehicle access to the property and surrounding
2 properties.

3 82. Save TED is informed and believes, and based thereon alleges, that Galway
4 Downs' actions and/or inactions were intentional and unreasonable. Galway Downs' conduct,
5 including but not limited to a failure to secure the appropriate County approvals for the activities
6 it is conducting on its property, a failure to comply with County memoranda, a notice of violation,
7 the cease and desist order and associated documents, or to take any action to mitigate traffic, dust,
8 noise, rubbish and safety impacts and to abate the nuisances complained of herein, were
9 intentional and unreasonable.

10 83. Save TED is informed and believes, and based thereon alleges, that Galway
11 Downs' unpermitted uses attract a very high number of cars and create significant traffic impacts
12 to the surrounding area. Indeed, Save TED is additionally informed and believes that Galway
13 Downs sometimes utilizes security guards for traffic control, but that the security guards are not
14 always present such that the traffic becomes a free-for-all. Save TED is informed and believes,
15 and based thereon alleges, that Galway Downs' disregard of County standards contributed to car
16 accidents in the area including an April 13 fatal car accident which recently occurred for vehicles
17 traveling eastbound on Highway 79 between Anza Road and Los Caballos, and a car/pedestrian
18 incident in March 2025.

19 84. Save TED is informed and believes, and based thereon alleges, that Galway
20 Downs' failure to prepare for or control the foreseeable traffic was and is, at least, negligent and
21 reckless.

22 85. Save TED is informed and believes, and based thereon alleges, that Galway
23 Downs' actions and/or inactions have created a condition or permitted a condition to exist that is
24 indecent or offensive to the senses in that on more than one occasion, attendees of Galway
25 Downs' unpermitted and unauthorized events have urinated and/or littered on Save TED
26 supporter property, while also complaining that Galway Downs has failed to provide adequate
27 restroom facilities.
28

86. Save TED did not consent to Galway Downs' conduct, and has repeatedly demanded that Galway Downs abate or remedy the issues raised herein.

87. Ordinary persons would be reasonably annoyed and/or disturbed by the conditions caused by Galway Downs' actions and/or inactions.

88. Save TED have suffered, and continue to suffer, harm to property and risk of personal injury due to Galway Downs' actions and/or inactions which are a substantial factor in causing Save TED's harm.

89. There is no public benefit to Galway Downs' conduct or, if any public benefit exists, it is far outweighed by the harm to Save TED, adverse impacts to the environment and hazards to the public safety that Galway Downs' conduct has created.

90. Save TED has suffered damages as a direct and proximate result of Galway Downs' actions and/or inactions. Therefore, Save TED prays for further relief as set forth below.

SECOND CAUSE OF ACTION

(Public Nuisance)

Against All Defendants

91. Save TED realleges and incorporates by this reference the allegations of paragraphs 1 through 90 above.

92. Save TED is informed and believes, and based thereon alleges, that Galway Downs owns, leases, occupies, and/or controls the property located at 38801 Los Corralitos Road.

93. Save TED is informed and believes, and based thereon alleges, that Galway Downs' actions and/or inactions are in violation of the WCCP and the County Code in addition to state statutes.

94. Save TED is informed and believes, and based thereon alleges, that in addition to violating state and local laws as noted above, and the violations set forth within the Notices of Pendency of Administrative Proceedings including Ord. 348 Sec. 3.3 [RCC 17.12.040] – zoning violations – Business activity not allowed; Ord. 348 Sec. 18.2(A)(2) [RCC 17.172.020(A)(2)] – zoning violation – land use permit required; and Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)] – zoning violation – violation of land use permit, Galway Downs’ actions set

1 forth herein have resulted in violations of Ord. No. 847 (Noise); Ord. No. 858 (Fireworks); Ord.
2 No. 927.1 (Short-Term Rentals) or camping/glamping restrictions; and Ord. No. 413 (Parking).

3 95. Galway Downs' actions and/or inactions have created a condition or permitted a
4 condition to exist that results in unmitigated noise, dust, rubbish and other pollution, interfering
5 with lawful permitted uses of Save TED supporter owned land for residential, agricultural,
6 livestock and incidental commercial uses of lands.

7 96. Save TED is informed and believes, and based thereon alleges, that pursuant to
8 Riverside County Ordinance No. 725 "Any condition on public or private property located within
9 the unincorporated areas of the County of Riverside which is caused, maintained or permitted to
10 exist in violation of any provision of a Land Use Ordinance shall be and the same is hereby
11 declared unlawful and a public nuisance that may be abated consistent with the procedures
12 provided for in this Ordinance, or in any other manner provided by law."

13 97. Galway Downs' actions and/or inactions, including but not limited to, the regular
14 occurrence of unpermitted and unauthorized athletic/sporting events at the property bringing
15 thousands of vehicles, have created a condition or permitted a condition to exist that is harmful to
16 health, substantially and unreasonably obstructs the free use of property, or is a safety hazard or
17 other potentially dangerous condition.

18 98. Galway Downs' actions and/or inactions have created a condition or permitted a
19 condition to exist that is harmful to health in that the unpermitted and unauthorized
20 athletic/sporting uses means, among other things, that the traffic and air quality impacts of
21 Galway Downs bringing thousands of vehicles has not been studied or analyzed.

22 99. Galway Downs' actions and/or inactions have created a condition or permitted a
23 condition to exist that unlawfully obstructs the free passage or use of Pauba Road, Los Caballos
24 Road, Los Corralitos Road, Highway 79, DePortola Road and Anza Road, while also interfering
25 with ingress and egress from lands owned by supporters of Save TED.

26 100. Galway Downs' actions and/or inactions have created a condition or permitted a
27 condition to exist that constitutes a fire or safety hazard by obstructing emergency vehicle access
28 to the property and surrounding properties.

1 101. Galway Downs' actions and/or inactions were intentional and unreasonable, and
2 its conduct, including but not limited to a failure to secure the appropriate County approvals for
3 the activities it is conducting on its property, a failure to comply with the County's memoranda,
4 notice of violation, cease and desist order and associated documents, or to take any action to abate
5 the nuisances complained of herein, were intentional and unreasonable.

6 102. Galway Downs' actions and/or inactions, and the resulting conditions, have
7 affected a substantial number of people at the same time, including but not limited to, Save TED
8 and members of the public who drive on Pauba Road, Los Caballos Road, Los Corralitos Road,
9 Highway 79, DePortola Road and Anza Road, all of whom suffer negative traffic impacts when
10 one of Galway Downs' unauthorized and unpermitted athletic/sporting events is taking place.

11 103. Save TED is informed and believes, and based thereon alleges, that Galway
12 Downs' actions and/or inactions have created a condition or permitted a condition to exist that is
13 indecent or offensive to the senses in that on more than one occasion, attendees of Galway
14 Downs' unpermitted and unauthorized events have urinated and/or littered on Save TED
15 supporter property, while also complaining that Galway Downs has failed to provide adequate or
16 enough restroom facilities.

17 104. Ordinary persons would be reasonably annoyed and/or disturbed by the conditions
18 caused by Galway Downs' actions and/or inactions.

19 105. There is no public benefit to Galway Downs' conduct or, if any public benefit
20 exists, it is far outweighed by the harm to Save TED and the general public, adverse impacts to
21 the environment and hazards to the public safety Galway Downs' conduct has created.

22 106. Save TED did not consent to Galway Downs' conduct and has repeatedly
23 demanded that Galway Downs abate or remedy such conduct.

24 107. Save TED has suffered, and continues to suffer, harm due to Galway Downs'
25 failure to correct and mitigate the traffic blockages and impacts resulting from unmitigated dust,
26 noise, fire hazard, and public safety hazard, rubbish and other pollution. The harm suffered by
27 Save TED differs from the harm suffered by the general public due to the proximity of their
28 property, homes and businesses to the Galway Downs property.

108. Galway Downs' actions and/or inactions are a substantial factor in causing Save TED's harm.

109. Save TED has suffered damages as a direct and proximate result of Galway Downs' actions and/or inactions. Therefore, Save TED prays for relief as set forth below.

THIRD CAUSE OF ACTION

(Nuisance *Per Se*)

Against All Defendants

110. Save TED realleges and incorporates by this reference the allegations of paragraphs 1 through 109 above.

111. Save TED is informed and believes, and based thereon alleges, that Galway Downs owns, leases, occupies, and/or controls the property located at 38801 Los Corralitos Road.

112. As noted herein, Galway Downs' actions and/or inactions are in violation of the WCCP and the County Code, including, but not limited to Violations of Ord. 348 Sections 3.3, 18.2(A)(2) and 18.2(A)(3); Ord. No. 847 (Noise); Violations of Ord. No. 858 (Fireworks); Violations of Ord. No. 927.1 and/or 927.2 (Short-Term Rentals); and Violations of Ord. No. 413 (Parking), and are in violation of state laws including, but not limited to violation of the California Environmental Quality Act, California Public Resources Code sections 21000, et seq., violation of California Fish and Game Code sections 1600, et seq., and violation of California Water Code sections 13000, et seq.

113. Save TED is informed and believes, and based thereon alleges, that pursuant to Riverside County Ordinance No. 725 “Any condition on public or private property located within the unincorporated areas of the County of Riverside which is caused, maintained or permitted to exist in violation of any provision of a Land Use Ordinance shall be and the same is hereby declared unlawful and a public nuisance that may be abated consistent with the procedures provided for in this Ordinance, or in any other manner provided by law.”

114. Galway Downs' actions and/or inactions therefore constitute nuisance per se.

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1 **FOURTH CAUSE OF ACTION**

2 **(Violation of Business and Professions Code Sections 17200 *et seq.*)**

3 **Against All Defendants**

4 115. Save TED incorporates by reference in this cause of action each and every
5 allegation of the preceding paragraphs, with the same force and effect as though fully set forth
6 herein.

7 116. Galway Downs is subject to the Unfair Competition Law Business & Professions
8 Code sections 17200, *et seq.* (“UCL”), which, in part defines “unfair competition” to include
9 “unlawful, unfair or fraudulent business practices.”

10 117. Galway Downs violated the “unlawful” prong of the UCL by engaging in self-help
11 actions by holding athletic/sporting and other events or permitting short term rentals or
12 camping/glamping without approvals or permits from the County as required by the County’s
13 Code, and from the State as required by California Fish and Game Code sections 1600, *et seq.*,
14 and California Water Code sections 13000, *et seq.*, by continuing such uses after issuance of the
15 County’s Notice of Violation, Notice of Pendency of Administrative Proceedings and cease and
16 desist letter which evidence noncompliance with the requirements of the Riverside County Codes
17 and Ordinances.

18 118. Galway Downs violated the “unlawful” prong of the UCL by holding
19 sporting/athletic events in buildings and structures that violate state and local laws including, but
20 not limited to, the Americans with Disabilities Act by having no adequate pathway of travel or
21 access for persons protected by the ADA.

22 119. Galway Downs violated the “unfair” prong of the UCL by engaging in self-help
23 actions by holding sporting/athletic events without approvals or permits from the County as
24 required by the County’s Code, and from the State as required by California Fish and Game Code
25 sections 1600, *et seq.*, and California Water Code sections 13000, *et seq.*, and by continuing to
26 hold sporting/athletic events after issuance of the County’s Notice of Violation, Notice of
27 Pendency of Administrative Proceedings and cease and desist letter which evidence
28

1 noncompliance with the requirements of the Riverside County Codes and Ordinances, including
2 the Fire Code.

3 120. Galway Downs has profited from its conduct, by holding special event and/or
4 sporting/athletic without approvals or permits from the County as required by the County's Code,
5 and from the State as required by California Fish and Game Code sections 1600, et seq., and
6 California Water Code sections 13000, et.seq., and without compliance with applicable state and
7 local laws intended to protect public health and safety and the environment.

8 121. Galway Downs' conduct caused substantial injury to Save TED and members of
9 the general public. Save TED has suffered injury in fact as a result of Galway Downs' unlawful
10 and unfair conduct. Save TED were and continue to be damaged because Galway Downs'
11 conduct interferes with an ability to use property.

12 122. Save TED are unable to avoid the injury caused by Galway Downs' conduct.

13 123. Save TED have suffered damages as a direct and proximate result of Galway
14 Downs' actions and/or inactions. Therefore, Save TED prays for relief as set forth below.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, plaintiffs pray for judgment against defendants, and each of them, as
17 follows:

- 18 1. Injunction to prohibit all unpermitted and illegal activities;
- 19 2. For damages according to proof;
- 20 3. For pre- and post-judgment interest on any amounts awarded;
- 21 4. For costs of suit incurred herein, including attorneys' fees; and,
- 22 5. For such other and further relief as the Court may deem proper.

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24
25
26 ///

27 ///

1 DATED: May 15, 2025

JACKSON TIDUS, A Law Corporation

2
3 By:

Michael L. Tidus

Gregory P. Regier

Josh J. Anderson

Attorneys for Plaintiffs,

SAVE TED – TEMECULA EQUESTRIAN

DISTRICT, INC., a California non-profit

corporation;

[REDACTED]

EXHIBIT 1



Charissa Leach, P.E.
Assistant TLMA Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Memorandum

Date: December 19, 2017

To: Denis Ferguson

From: Charissa Leach, P.E. Assistant TLMA Director

RE: Outlined Uses for Galway Downs

This memo provides a summary of our December 7, 2017 meeting regarding the uses that Galway Downs would like to accommodate at its existing equestrian center. The list of uses that was provided to Planning Staff for review is attached to this memo. You will see on the attachment that the uses are separated into groups marked A, B, C, and D.

Group A are uses that may continue to operate at Galway Downs under its existing Conditional Use Permit No. 2303 (CUP No. 2303).

Group B and C are new uses that the revised Conditional Use Permit No. 2303 (CUP No. 2303R1) may propose to accommodate and will be analyzed accordingly. The revised permit will classify Galway Downs as a Class II Equestrian Establishment. Group B uses are currently permitted under the Wine Country-Equestrian (WC-E) Zone. Group C uses are not permitted under the WC-E Zone and will require a text amendment to Ordinance No. 348.

This memo does not imply that Planning staff will support the proposed ordinance amendment. Planning staff retains the ability to recommend approval or denial of the proposed project upon review of the Community feedback and land use and environmental analysis. Camping/Glamping, Country Club and Sports Arena are uses that are not usually associated with equestrian centers. Prior to your Community outreach efforts, submit a clear description of each use in Group C and a revised site plan to Planning staff for review. The descriptions will include the parameters and development standards that these uses may establish through the WC-E Zone.

Group D are residential uses. One-family Dwellings and Second Units are permitted in WC-E Zone. A subdivision will be required if more than one primary dwelling unit is proposed. WC-E Zone requires a minimum lot size 10 gross acres for future subdivisions. The WC-E Zone permits Cottage Industries within a one-family dwelling unit.

We suggested that you submit a Pre-Application Review (PAR) during our meeting. This would not be necessary because Galway Downs currently has CUP No. 2303R1 and Noise Exemption No. 0009 in process to add a special occasion facility. The case set is currently negative \$5,600 and is assessed for an additional \$15,300 deposit. We understand that Galway Downs is working towards submitting an updated project for review and we look forward to assisting you through the land use review and entitlement process.

Riverside Office • 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 • Fax (951) 955-1811

Desert Office • 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 • Fax (760) 863-7040

"Planning Our Future... Preserving Our Past"

GALWAY DOWNS ALLOWABLE USES

- B• CLASS 2 EQUESTRIAN FACILITY
- A• HORSE RACING
- A• HORSE EVENTS – MULTIPLE DISCIPLINES
- A• TRAINING
- A• BOARDING
- A• HORSESHOW FACILITIES
- A• WESTERN STYLE STORE
- B• ANIMAL HOSPITAL
- A• POLO GROUND
- A• EQUINE EQUIPMENT SERVICE AND SUPPLY STORE
- A• RODEO ARENA

- A• RESTAURANT

- B• SPECIAL OCCASION/EVENT FACILITY NOT LIMITED TO THE FOLLOWING:

- C▪ COUNTRY CLUBS
- B▪ FARMERS MARKETS
- B▪ FESTIVALS
- B▪ EXPOSITIONS (HOME AND GARDEN & ARTS AND CRAFTS)
- B▪ MARATHONS
- B▪ OBSTACLE CHALLENGES
- C▪ SPORTING ARENAS

A SPECIAL FACILITY IS DEFINED AS AN INDOOR/OUTDOOR FACILITY AREA WHICH IS USED FOR SPECIAL OCCASIONS SUCH AS WEDDINGS, PARTIES, CONCERTS, CONFERENCES, CHARITY EVENTS AND FUNDRAISER EVENTS FOR A SPECIFIC PERIOD OF TIME IN RETURN FOR COMPENSATION.

- C• ATHLETICS/SPORTING EVENTS

- LAWN GAMES (LAWN BOWLING, FIELD HOCKEY, FOOTBALL, SOCCER AND CROCKET) INCLUDING GAMES, TOURNAMENTS AND TRAINING.

- A• TRAILER PARK
- D• RANCH HOUSES
- C• CAMPING/GLAMPING
- D• COTTAGE INDUSTRIES
- B• PETTING ZOO

EXHIBIT 2



**CODE ENFORCEMENT
DEPARTMENT
COUNTY OF RIVERSIDE**

581 South Grand Ave San
Jacinto, CA 92582
(951) 791-3900
FAX (951) 791-3910

NOTICE OF VIOLATION

May 14, 2018

SFT Realty Galway Downs, LLC
c/o Southwest Traders
27711 Diaz Road
Temecula, CA 92592

RE CASE NO: CV17-02804 at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002.

NOTICE IS HEREBY GIVEN that property owned or controlled by you at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002, is in violation of RCO No. 348 Section 3.3 and Article XIVd.

Said violation is described as:

- 1) RCO No. 348 Section 3.3 and Article XIVd – Wine Country Equestrian Zone (WC-E) Zone (unpermitted land use activities) - No land, building, or structure shall be used, constructed, altered, or maintained except in conformance with the provisions of this title – **Unpermitted land use activities and violation of current land use entitlements including, but not limited to, Conditional Use Permit (“CUP”) No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303.**

1. Soccer Tournaments/Athletic Events/Sporting Events
2. Weddings
3. Corporate Events
4. Marathons
5. Obstacle challenges

YOU ARE HEREBY REQUIRED TO COMPLY with the provisions of the ordinance by:

- 1) Discontinue illegal use(s). Obtain Riverside County Planning Department approval and comply with the approved conditions of all current land use entitlements, including, but not limited to CUP No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303. Contact the Planning Department at 951-955-3200 for further information.

COMPLIANCE MUST BE COMPLETED BY May 30, 2018. FAILURE TO COMPLY WILL RESULT IN LEGAL ACTION BEING BROUGHT AGAINST YOU.

NOTICE IS HEREBY GIVEN THAT AT THE CONCLUSION OF THIS CASE YOU WILL RECEIVE A SUMMARY OF ADMINISTRATIVE COSTS ASSOCIATED WITH THE PROCESSING OF SUCH VIOLATION(S), AT AN HOURLY RATE OF \$142.00 AS DETERMINED BY THE BOARD OF SUPERVISORS.

YOU WILL HAVE THE RIGHT TO OBJECT TO THESE CHARGES BY FILING A REQUEST FOR HEARING WITH THE DEPARTMENT OF CODE ENFORCEMENT WITHIN TEN (10) DAYS OF SERVICE OF THE SUMMARY OF CHARGES, PURSUANT TO SECTION 1.16.080 OF RIVERSIDE COUNTY CODE.

CODE ENFORCEMENT DEPARTMENT


By: Brian Bealer, Sr. Code Enforcement Officer



**CODE ENFORCEMENT
DEPARTMENT
COUNTY OF RIVERSIDE**

581 South Grand Ave San
Jacinto, CA 92582
(951) 791-3900
FAX (951) 791-3910

NOTICE OF VIOLATION

May 14, 2018

SFT Realty Galway Downs, LLC
Kenneth C. Smith
Agent for Service of Process: Scott Schafer
44040 Jeramie Drive
Temecula, CA 92592

RE CASE NO: CV17-02804 at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002.

NOTICE IS HEREBY GIVEN that property owned or controlled by you at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002, is in violation of RCO No. 348 Section 3.3 and Article XIVd.

Said violation is described as:

- 1) RCO No. 348 Section 3.3 and Article XIVd – Wine Country Equestrian Zone (WC-E) Zone (unpermitted land use activities) - No land, building, or structure shall be used, constructed, altered, or maintained except in conformance with the provisions of this title – **Unpermitted land use activities and violation of current land use entitlements including, but not limited to, Conditional Use Permit (“CUP”) No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303.**

1. Soccer Tournaments/Athletic Events/Sporting Events
2. Weddings
3. Corporate Events
4. Marathons
5. Obstacle challenges

YOU ARE HEREBY REQUIRED TO COMPLY with the provisions of the ordinance by:

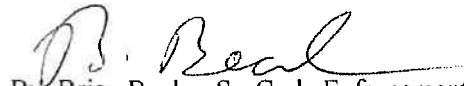
- 1) Discontinue illegal use(s). Obtain Riverside County Planning Department approval and comply with the approved conditions of all current land use entitlements, including, but not limited to CUP No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303. Contact the Planning Department at 951-955-3200 for further information.

COMPLIANCE MUST BE COMPLETED BY May 30, 2018. FAILURE TO COMPLY WILL RESULT IN LEGAL ACTION BEING BROUGHT AGAINST YOU.

NOTICE IS HEREBY GIVEN THAT AT THE CONCLUSION OF THIS CASE YOU WILL RECEIVE A SUMMARY OF ADMINISTRATIVE COSTS ASSOCIATED WITH THE PROCESSING OF SUCH VIOLATION(S), AT AN HOURLY RATE OF \$142.00 AS DETERMINED BY THE BOARD OF SUPERVISORS.

YOU WILL HAVE THE RIGHT TO OBJECT TO THESE CHARGES BY FILING A REQUEST FOR HEARING WITH THE DEPARTMENT OF CODE ENFORCEMENT WITHIN TEN (10) DAYS OF SERVICE OF THE SUMMARY OF CHARGES, PURSUANT TO SECTION 1.16.080 OF RIVERSIDE COUNTY CODE.

CODE ENFORCEMENT DEPARTMENT

A handwritten signature in cursive script, appearing to read "B. Bealer", written in dark ink.

By: Brian Bealer, Sr. Code Enforcement Officer



**CODE ENFORCEMENT
DEPARTMENT
COUNTY OF RIVERSIDE**

581 South Grand Ave San
Jacinto, CA 92582
(951) 791-3900
FAX (951) 791-3910

NOTICE OF VIOLATION

May 14, 2018

SFT Realty Galway Downs, LLC
Kenneth C. Smith
Agent for Service of Process: Scott Schafer
100 E. San Marcos Blvd. Suite #400
San Marcos, CA 92069

RE CASE NO: CV17-02804 at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002

NOTICE IS HEREBY GIVEN that property owned or controlled by you at 38801 Los Corralitos Road, in the community of TEMECULA, California, Assessor's Parcel Number(s) 927-160-001 and 927-160-002, is in violation of RCO No. 348 Section 3.3 and Article XIVd.

Said violation is described as:

1) RCO No. 348 Section 3.3 and Article XIVd – Wine Country Equestrian Zone (WC-E) Zone (unpermitted land use activities) - No land, building, or structure shall be used, constructed, altered, or maintained except in conformance with the provisions of this title – **Unpermitted land use activities and violation of current land use entitlements including, but not limited to, Conditional Use Permit (“CUP”) No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303.**

1. Soccer Tournaments/Athletic Events/Sporting Events
2. Weddings
3. Corporate Events
4. Marathons
5. Obstacle challenges

YOU ARE HEREBY REQUIRED TO COMPLY with the provisions of the ordinance by:

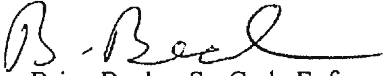
1) Discontinue illegal use(s). Obtain Riverside County Planning Department approval and comply with the approved conditions of all current land use entitlements, including, but not limited to CUP No. 2303 and Substantial Conformance Nos. 2 and 3 to CUP 2303. Contact the Planning Department at 951-955-3200 for further information.

COMPLIANCE MUST BE COMPLETED BY May 30, 2018. FAILURE TO COMPLY WILL RESULT IN LEGAL ACTION BEING BROUGHT AGAINST YOU.

NOTICE IS HEREBY GIVEN THAT AT THE CONCLUSION OF THIS CASE YOU WILL RECEIVE A SUMMARY OF ADMINISTRATIVE COSTS ASSOCIATED WITH THE PROCESSING OF SUCH VIOLATION(S), AT AN HOURLY RATE OF \$142.00 AS DETERMINED BY THE BOARD OF SUPERVISORS.

YOU WILL HAVE THE RIGHT TO OBJECT TO THESE CHARGES BY FILING A REQUEST FOR HEARING WITH THE DEPARTMENT OF CODE ENFORCEMENT WITHIN TEN (10) DAYS OF SERVICE OF THE SUMMARY OF CHARGES, PURSUANT TO SECTION 1.16.080 OF RIVERSIDE COUNTY CODE.

CODE ENFORCEMENT DEPARTMENT

A handwritten signature in black ink, appearing to read "B. Bealer", is written over the typed name.

By: Brian Bealer, Sr. Code Enforcement Officer

EXHIBIT 3

RECORDING REQUESTED BY:
County of Riverside
Code Enforcement Department

AND WHEN RECORDED MAIL TO:
County of Riverside
Code Enforcement Department
581 South Grand Avenue
San Jacinto, CA 92582
Mail Stop #5002

2022-0397260

09/16/2022 01:44 PM Fee: \$ 0.00

Page 1 of 2

Recorded in Official Records
County of Riverside
Peter Aldana
Assessor-County Clerk-Recorder



8778

(space for recorder's use)

NOTICE OF PENDENCY OF ADMINISTRATIVE PROCEEDINGS

In the matter of the public nuisance or other violation(s)
of the Riverside County Code ("RCC")/Riverside County Ordinance ("RCO") on the property of:
Sft Realty Galway Downs)
and DOES I through X, Owners)

Case #:
CVZO220874

NOTICE IS HEREBY GIVEN to all persons, pursuant to Section 14 of RCO Number 725 of the County of Riverside, State of California, that administrative proceedings have been commenced with respect to the structure or land located upon the following described real property in the County of Riverside:

ADDRESS: 38801 Los Corralitos Rd, Temecula, CA 92592
PARCEL #: 927-160-001
LEGAL DESCRIPTION: 112.33 Acres M/L In Por Sec 7 T8s R1w
VIOLATIONS: Ord. 348 Sec 3.3 [RCC 17.12.040]- Zoning Violation-Business/Activity Not Allowed
Ord. 348 Sec. 18.2(A) (2) [RCC 17.172.020(A)(2)]- Zoning Violation-Land Use Permit Required
Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)]- Zoning Violation-Violation of Land Use Permit

Such proceedings are based upon the noncompliance of such structure or land with the requirements of Riverside County Codes/Ordinances listed above. Failure to comply with the lawful orders of the Deputy Director (Code Enforcement) and/or authorized agents of the County of Riverside heretofore and hereafter issued relative to the above matter may result in, abatement/removal of the public nuisance or other violation(s) of the Riverside County Code/Riverside County Ordinance, and other available legal remedies, as well as assessment of the abatement fees and costs, expenses, and administrative costs thereof to the property heretofore described as a tax and special assessment lien on such property. Any purchaser(s), heir(s), transferee(s), gift recipient(s), assigns, or any other persons and/or entities acquiring said property subsequent to the recording of the Notice with the County Recorder shall have such interest subject and subordinate to said tax and assessment lien and shall be liable for any unpaid abatement costs and fees.

COUNTY OF RIVERSIDE CODE ENFORCEMENT DEPARTMENT

By: 
Manuel Acueto, Supervising Code Enforcement Officer

Dated: 09/07/2022

NOTICE OF PENDENCY OF ADMINISTRATIVE PROCEEDINGS
PAGE TWO APN: 927-160-001

ACKNOWLEDGEMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Riverside)

On 09/07/2022 before me, Nicole Christine Gonzales, Notary Public, personally appeared Manuel Acueto who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Commission #: 2382613; Expires: 11/11/2025

Signature: _____

Nicole Christine Gonzales

(Seal)

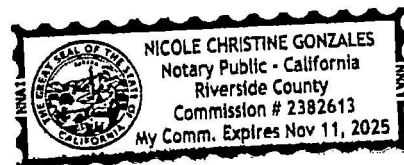


EXHIBIT 4

RECORDING REQUESTED BY:
County of Riverside
Code Enforcement Department

AND WHEN RECORDED MAIL TO:
County of Riverside
Code Enforcement Department
581 South Grand Avenue
San Jacinto, CA 92582
Mail Stop #5002

2022-0397261

09/16/2022 01:44 PM Fee: \$ 0.00

Page 1 of 2

Recorded in Official Records
County of Riverside
Peter Aldana
Assessor-County Clerk-Recorder



8778

(space for recorder's use)

NOTICE OF PENDENCY OF ADMINISTRATIVE PROCEEDINGS

In the matter of the public nuisance or other violation(s)
of the Riverside County Code ("RCC")/Riverside County Ordinance ("RCO") on the property of:
Sft Realty Galway Downs)
and DOES I through X, Owners)

Case #:
CVZO220875

NOTICE IS HEREBY GIVEN to all persons, pursuant to Section 14 of RCO Number 725 of the County of Riverside, State of California, that administrative proceedings have been commenced with respect to the structure or land located upon the following described real property in the County of Riverside:

ADDRESS: 38801 Los Corralitos Rd, Temecula, CA 92592
PARCEL #: 927-160-002
LEGAL DESCRIPTION: 129.30 Acres M/L In Por Sec 1 T8s R2w And Por Sec 12 T8s R2w
VIOLATIONS: Ord. 348 Sec 3.3 [RCC 17.12.040]- Zoning Violation-Business/Activity Not Allowed
Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)]- Zoning Violation-Violation of Land Use Permit

Such proceedings are based upon the noncompliance of such structure or land with the requirements of Riverside County Codes/Ordinances listed above. Failure to comply with the lawful orders of the Deputy Director (Code Enforcement) and/or authorized agents of the County of Riverside heretofore and hereafter issued relative to the above matter may result in, abatement/removal of the public nuisance or other violation(s) of the Riverside County Code/Riverside County Ordinance, and other available legal remedies, as well as assessment of the abatement fees and costs, expenses, and administrative costs thereof to the property heretofore described as a tax and special assessment lien on such property. Any purchaser(s), heir(s), transferee(s), gift recipient(s), assigns, or any other persons and/or entities acquiring said property subsequent to the recording of the Notice with the County Recorder shall have such interest subject and subordinate to said tax and assessment lien and shall be liable for any unpaid abatement costs and fees.

COUNTY OF RIVERSIDE CODE ENFORCEMENT DEPARTMENT

By: 
Manuel Acueto, Supervising Code Enforcement Officer

Dated: 09/07/2022

NOTICE OF PENDENCY OF ADMINISTRATIVE PROCEEDINGS
PAGE TWO APN: 927-160-002

ACKNOWLEDGEMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

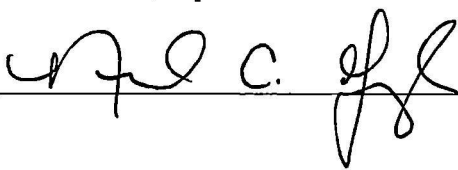
State of California)
County of Riverside)

On 09/07/20222 before me, Nicole Christine Gonzales, Notary Public, personally appeared Manuel Acueto who proved to me on the basis of satisfactory evidence to be the person(~~s~~) whose name(~~s~~) is/~~are~~ subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Commission #: 2382613; Expires: 11/11/2025

Signature:  (Seal)

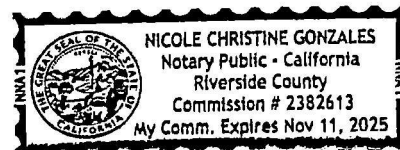


EXHIBIT 5

RECORDING REQUESTED BY:
County of Riverside
Code Enforcement Department

AND WHEN RECORDED MAIL TO:
County of Riverside
Code Enforcement Department
581 South Grand Avenue
San Jacinto, CA 92582
Mail Stop #5002

2022-0397259

09/16/2022 01:44 PM Fee: \$ 0.00

Page 1 of 2

Recorded in Official Records
County of Riverside
Peter Aldana
Assessor-County Clerk-Recorder



8778

(space for recorder's use)

NOTICE OF PENDENCY OF ADMINISTRATIVE PROCEEDINGS

In the matter of the public nuisance or other violation(s)
of the Riverside County Code ("RCC")/Riverside County Ordinance ("RCO") on the property of:
Sft Realty Galway Downs)
and DOES I through X, Owners)

Case #:
CV1702804

NOTICE IS HEREBY GIVEN to all persons, pursuant to Section 14 of RCO Number 725 of the County of Riverside, State of California, that administrative proceedings have been commenced with respect to the structure or land located upon the following described real property in the County of Riverside:

ADDRESS: 38801 Los Corralitos Rd, Temecula, CA 92592
PARCEL #: 927-160-002
LEGAL DESCRIPTION: 129.30 Acres M/L In Por Sec 1 T8s R2w And Por Sec 12 T8s R2w
VIOLATIONS: Ord. 348 Sec. 18.2(A) (2) [RCC 17.172.020(A)(2)]- Zoning Violation-Land Use Permit Required

Such proceedings are based upon the noncompliance of such structure or land with the requirements of Riverside County Codes/Ordinances listed above. Failure to comply with the lawful orders of the Deputy Director (Code Enforcement) and/or authorized agents of the County of Riverside heretofore and hereafter issued relative to the above matter may result in, abatement/removal of the public nuisance or other violation(s) of the Riverside County Code/Riverside County Ordinance, and other available legal remedies, as well as assessment of the abatement fees and costs, expenses, and administrative costs thereof to the property heretofore described as a tax and special assessment lien on such property. Any purchaser(s), heir(s), transferee(s), gift recipient(s), assigns, or any other persons and/or entities acquiring said property subsequent to the recording of the Notice with the County Recorder shall have such interest subject and subordinate to said tax and assessment lien and shall be liable for any unpaid abatement costs and fees.

COUNTY OF RIVERSIDE CODE ENFORCEMENT DEPARTMENT

By: 
Manuel Acueto, Supervising Code Enforcement Officer

Dated: 09/07/2022

ACKNOWLEDGEMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Riverside)

On 09/07/2022 before me, Nicole Christine Gonzales, Notary Public, personally appeared Manuel Acueto who proved to me on the basis of satisfactory evidence to be the person(~~s~~) whose name(~~s~~) is/~~are~~ subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Commission #: 2382613; Expires: 11/11/2025

Signature: [Signature] (Seal)

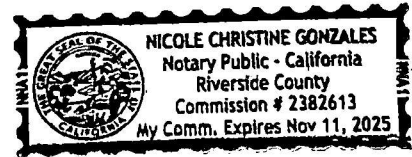


EXHIBIT 6



County of Riverside
Code Enforcement Department

CEASE AND DESIST

January 3, 2023

Owners / Occupants /Responsible Parties:

SFT Realty Galway Downs, LLC 38801 Los Corralitos Road Temecula, California 92592	Copy Mailed to: SFT Realty Galway Downs, LLC C/O Kenneth C. Smith – Agent 35879 Belle Chaine Temecula, California 92592
---	---

Re: 38801 Los Corralitos Road, Temecula, California 92592
(APN # 927-160-001 and # 927-160-002) (Property)
Code Enforcement Case Nos. CVZO220874 and CVZO220875

CEASE AND DESIST all activities (including sporting and wedding events and all advertising, selling, renting, taking reservations, related to such events) in violation of Riverside County Ordinance No. 348.

You must immediately contact Code Enforcement at (951) 955-2004 to schedule a compliance inspection to be conducted no later than January 13, 2023.

To All Responsible Parties:

According to County of Riverside (County) investigations, unlawful land uses and associated activities have occurred on the subject Property, including, but not limited to, unpermitted sporting and wedding and other large events and related activities, including advertising, selling, renting, taking reservations, among others, as well as all unpermitted improvements located on the subject Property.

The County considers such unlawful/unpermitted uses and activities to constitute a public nuisance due to the violation of Riverside County Ordinance (RCO) No. 348. The County has the authority to control local land uses and to regulate and ban unpermitted and unlawful activity within its jurisdiction. Wedding and sporting events, and related business activities, are unlawful in the WC-E zone without a valid land use permit issued by the County.

ACCORDINGLY, YOU ARE HEREBY ORDERED to immediately CEASE AND DESIST all uses and activities (including advertising, selling, renting, taking reservations) relating to unpermitted events at the subject Property.

4080 Lemon Street, 12th Floor, Riverside, CALIFORNIA 92501
(951) 955-2004 ▪ FAX (951) 955-8680

38801 Los Corralitos Road, Temecula, California 92592
(APN # 927-160-001 and # 927-160-002)
Code Enforcement Case Nos. CVZO220874 and CVZO220875

January 3, 2023

You must contact the County Code Enforcement Department at (951) 955-2004 immediately to schedule a compliance inspection date, which must take place no later than January 13, 2023. At the compliance inspection, the Code Enforcement officer shall verify that the unlawful activity has been terminated.

As a result of failure to bring the subject Property into compliance with the Ordinances, on September 16, 2022, the County recorded a Notice of Pendency of Administrative Proceedings (for each parcel), providing notice that administrative proceedings have been commenced with respect to the public nuisance and code violations on the subject Property.

PLEASE BE ADVISED that the County will continue to use all available legal means to prohibit unpermitted uses, events, activities, and other violations within the unincorporated County area. **If a compliance inspection is not completed on or before January 13, 2023, the County will proceed to immediately file a lawsuit against you.**

Additionally, any and all information pertaining to criminal activity as a result of unlawful and unpermitted events within the unincorporated area of the County may be shared with appropriate law enforcement agencies to pursue criminal action at the discretion of the agency.

The Property owner and any other responsible party shall be liable for all abatement fees and costs, expenses, and administrative costs associated with the abatement/removal of the public nuisance and violations of the RCO. (See RCO No. 725; Gov. Code, § 25845.) Pursuant to Government Code section 25845, unpaid abatement costs may be specially assessed against the subject Property. The assessment may be collected at the same time and in the same manner as the collection of ordinary county taxes are collected, and shall be subject to the same penalties and the same procedure and sale in case of delinquency as are provided for ordinary county taxes. Specifically, fees and costs related to the enforcement and abatement of the code violations may result in the imposition of a lien and special tax assessment against the subject Property. **The violations of RCO No. 348 at the subject Property already have resulted in abatement costs, including but not limited to investigation costs, attorneys' fees, and civil penalties accruing at the rate of up to \$1,000 per day for each day that the violations continue to exist. (See RCO No. 725.)**

38801 Los Corralitos Road, Temecula, California 92592
(APN # 927-160-001 and # 927-160-002)
Code Enforcement Case Nos. CVZO220874 and CVZO220875

January 3, 2023

Once abatement is complete and confirmed, you may contact the County Code Enforcement Department to discuss the final outstanding balance of unpaid abatement costs and/or civil penalties, after which the County may release the Notice of Pendency recorded against the subject Property.

Sincerely,

RYAN CALAMETTI
Code Enforcement Officer

RON WELCH
Supervising Code Enforcement Officer SET

ROBERT MAGEE
Code Enforcement Director



**CODE ENFORCEMENT DEPARTMENT
COUNTY OF RIVERSIDE
AFFIDAVIT OF POSTING OF NOTICES**

January 03, 2023

RE CASE NO: CVZO220875

I, Nicole Gonzales, hereby declare:

I am employed by the Riverside County Code Enforcement Department; that my business address is:

581 South Grand Avenue, San Jacinto, CA 92582 • (951) 955-2004 • FAX (951) 791-3910

That on 1/3/23 at 02:10 PM, I securely and conspicuously posted a Cease and Desist Letter for Ord. 348 Sec 3.3 [RCC 17.12.040], Ord. 348 Sec. 18.2(A)(3) [RCC 17.172.020(A)(3)]:

at the property described as:

Property Address: 38801 LOS CORRALITOS RD, TEMECULA, CA 92592

Assessor's Parcel Number: 927160002

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

Executed on January 03, 2023 in the County of Riverside, California.

CODE ENFORCEMENT DEPARTMENT

By: Nicole Gonzales, Code Enforcement Officer II

By Appointment Only

581 South Grand Avenue, San Jacinto, CA 92582 • (951) 955-2004 • FAX (951) 791-3910

EXHIBIT 7

Galway Soccer 2025

April 5-6	Southwest Spring Madness Spring Madness Showcase, U7-U11, April 5th-6th
April 12-13	Empire Surf live music Temecula Spring Soccer Festival - Empire Surf
April 26-27	Ice Breakers SDSC Surf Icebreakers Cup
May 3-4	Rebels National Challenge Rebels National Challenge
May 17-18	Golden State Challenge Golden State Challenge
May 24-25	Club America Cup 2025 Schedules - Club America Cup
May 26	Club America Cup Finals Schedules - Club America Cup
May 31/Jun 1	Wine Country Classic Boys Temecula Wine Country Classic City SC Southwest
June 7-8	Wine Country Classic Girls Temecula Wine Country Classic City SC Southwest
June 27-30	National Cup West Regional West Regional – US Club Soccer Website
July 12-14	Albion Cup Girls ALBION CUP National Showcase –
July 19-20	Sporting Calif Summer Classic 2025 Sporting California Summer Classic Soccer
July 26-27	Temecula Mid Summer Cup Temecula Midsummer Cup City SC Southwest
Aug 9-10	Temecula Summer Classic Temecula Summer Classic City SC Southwest
Aug 16-17	Empire Super Cup Home - Empire Super Cup
Aug 23-24	Albion Cup Albion Cup Preseason Elite Showcase
Nov 29-30	Rebels Thanksgiving Showdown Thanksgiving Showdown
Decem 6-7	Temecula Holiday Classic Temecula Holiday Classic City SC Southwest