**CALIFORNIA UNDERGROUND SAFETY BOARD**
**INVESTIGATION DIVISION**

# INVESTIGATION REPORT

**Date:** April 3, 2026
**Case No.:** C232120002

**Violations:**
Horusicky Construction Inc.

| | |
|---|---|
| Government Code § 4216.2(b): | Excavating without first notifying the regional notification center of intent to excavate. |

**Executive Summary:**
On February 22, 2023, Horusicky Construction Inc. used a bobcat excavator to remove a tree in the backyard at 3767 Ashwood Avenue, Los Angeles, California 90066 prior to notifying the regional notification center. During the removal of the tree, a private electrical facility was cut that ran between the house and the garage.

On February 23, 2023, the day following the electrical facility damage, Horusicky Construction Inc. contacted the regional notification center of intent to install a swimming pool at that address.

**Reporting Party Information:**
Serena Puga, Homeowner
3767 Ashwood Avenue
Los Angeles, California 90066

**Date of Incident:**
February 22, 2023

**Location of the Incident:**
3767 Ashwood Avenue
Los Angeles, California 90066

**Operator:**
Homeowner

**Excavator:**
Horusicky Construction Inc.

P.O. Box 3789
Palos Verdes, California 90274

**Facility Types Damaged:**
½-inch Private electrical facility

**Notification of the Incident**
On July 31, 2023, Serena Puga submitted a notification on an incident to the Underground Safety Board. . The notification stated, on February 22, 2023, Horusicky Construction Inc. damaged electrical facilities while installing a pool at 3767 Ashwood Avenue Los Angeles, California 90066. (Exh. 1.)

**Excavation and Damage**
In a letter on dated October 23, 2023, McGuiness stated that the electrical lines were cut during the "excavation of the pool." (Exh. 5)

The homeowner, Serena Puga (Puga), stated that the electrical damage occurred on February 22, 2023, and that the contractor, Horusicky Construction Inc., had stated they did not notify the regional notification center for this sort of work. (Exh. 6.)




**Photo 1:** Photograph of a Bobcat E20 excavator provided by homeowner Serena Puga. Image cropped by investigator. (Exh. 7.)

**Identity of the Excavator**
Government Code section 4216(g) defines "excavation" to be the use of tools or equipment to move or displace earth, rock, or other material in the ground.

Government Code section 4216(h) defines an excavator to be "any person, firm, contractor or subcontractor, owner, operator, utility, association, corporation, partnership, business trust, public agency, or other entity that, with their own employees or equipment performs any excavation."

On December 7, 2023, Joseph G. McGuinness, an attorney representing Horusicky Construction Inc., stated via email to investigator that Horusicky Construction was using a Bobcat E 20 excavator to remove a tree on February 22, 2023 at approximately 2:00 p.m. when the electrical lines were damaged. McGuinness further states that Horusicky Construction Inc. then used shovels to expose the remaining electrical facilities running through the area of the pool construction. (Exh. 4.)

Horusicky Construction is currently licensed by the Contractor's State License Board, license number 309844 with classifications C-29 Masonry and C-53 Swimming Pool. (Exh. 2.)

**Identity of the Operator**
Government Code section 4216(o) defines an operator to be "any person, corporation, partnership, business trust, public agency, or other entity that owns, operates, or maintains a subsurface installation."

On ticket A230540009-00A, created on February 23, 2023, all utility operators provided a clear no conflict electronic positive response, while Los Angeles County Water Works provided code 002 "Clear - no conflict but privately owned utility on property – contact private utility owner for locate." (Exh. 3.)

The electrical lines ran through the area that the pool between the house and the garage. During the installation of the pool, Horusicky Construction Inc. used a bobcat to remove a tree in the backyard area and during the use of the bobcat cut the electrical facility. (Exh. 4, 5.)

**Horusicky Construction Inc. Used a Bobcat to Remove a Tree at 3767 Ashwood Avenue Prior to Notifying the Regional Notification Center**
Government Code section 4216.2(b) states that an excavator planning to excavate shall notify the appropriate regional notification center of the excavator's intent to excavate at least two working days, and not more than 14 calendar days, before beginning that excavation.

Horusicky Construction Inc. confirmed through email that they used a bobcat to remove the tree on February 22, 2023. (Exh. 4.)

Horusicky Construction Inc. stated that the "tree and the entangled electrical line were both removed on February 22, 2023, at approximately 2:00 p.m." Horusicky Construction Inc. also stated "On February 23, 2023, HCI issued a request for a Dig Alert report" which is the day after the incident occurred. (Exh. 4.)

On Monday September 11, 2023, the investigator contacted DigAlert to search for tickets at 3767 Ashwood Avenue Los Angeles California 90066 in 2022 and 2023. (Exh. 3.)

On September 12, 2023, Amber Dahl, Safety Director of DigAlert, replied and provided a ticket created for Mike Horusicky of Horusicky Construction Inc. on February 23, 2023, at 6:10 a.m., the day following the damage. (Exh. 2.)

**Horusicky Construction Inc. Contacted the Regional Notification Center After the Facility Damage**

Government Code section 4216.2(b) states that an excavator planning to excavate shall notify the appropriate regional notification center of the excavator's intent to excavate at least two working days, and not more than 14 calendar days, before beginning that excavation.

On February 23, 2023, Horusicky Construction Inc. notified the regional notification center of its intent to excavate and the regional notification created ticket A230540009-00A for work start date of February 27, 2025, to install a swimming pool for "H/O Puga, Serena." (Exh. 3.)

Puga also provided photographs and copy of a text conversation between her Executive Assistant, Orna Tisser, on February 22, 2023, that the electrical facility was damaged that day, a day prior to notifying the regional notification center. (Exh. 7.)

**Findings:**

1. Horusicky Construction Inc. used a bobcat to remove a tree at 3767 Ashwood Avenue on February 22, 2023, prior to notifying the regional notification center and damaged a private electrical facility.
2. Every operator on USA Ticket A230540009-00A stated the area for the installation of the pool was clear of conflict.

| Investigator | Supervisor |
|---|---|
| Jeff McClenahan | Anona Bonner |
| Signature | Signature |
| /s/Jeff McClenahan | /s/Anona Bonner |

**Exhibit List:**

| Exhibit No. | Description | Date | Received From |
|---|---|---|---|
| 1 | Notification Information Report C23210002 | Submitted on 7/31/2023 | DigCase Case Management System; Reporter Serena Puga |
| 2 | Contractor's License Detail for License No. 309844 obtained from the Contractors State License Board website | Downloaded on 8/29/2025 | California Contractors State License Board website at https://www.cslb.ca.gov/onlineservices/checklicensell/checklicense.aspx |
| 3 | Emails with DigAlert and Ticket A230540009-00A | Received on 9/12/2023 | Amber Dahl, Safety Awareness Director, DigAlert |
| 4 | Email with responses to investigation questions from Joseph G. McGuinness | Received on 12/7/2023 | Joseph G. McGuinness, McGuiness Law Group, representing Horusicky Construction Inc. |
| 5 | Letter from Attorney Joseph G. McGuinness to the Investigator | Received on October 20, 2023 | Joseph G. McGuinness, McGuiness Law Group, representing Horusicky Construction Inc. |
| 6 | Notes of Interview with Serena Puga | Conducted on September 19, 2023 | Investigator |
| 7 | Emails from Serena Puga with All Photos from Executive Assistant Orna Tisser | Received September 18-26, 2025 | Serena Puga, Homeowner |

# Exhibit 1

# Notification Information Report

## Information for Notification Number:- C232120002

**Date Logged to CRM:-** **7/31/2023 5:49 PM**

| Complaint/Incident Information | |
|---|---|
| Incident/Complaint Description | MY POOL CONTRACTOR, MIKE HORUSICKY OF HORUSICKY CONSTRUCTION, (HORUSICKY CONSTRUCTION INC, P O BOX 3789, PALOS VERDES, CA 90274, BUSINESS PHONE NUMBER:(310) 454-4385, MIKEHORUSICKY@YAHOO.COM, CALIFORNIA STATE CONTRACTORS LICENSE 309844) WILLFULLY AND ADMITTEDLY FAILED TO OBTAIN A DIGALERT TICKET BEFORE EXCAVATING IN MY BACKYARD AND EXCAVATED ELECTRICAL LINES THAT HE ALSO CUT WITH WIRES OUTSIDE HIS SCOPE OF PRACTICE) AND DENIED WRONGDOING, STATING 'I'VE DONE THOUSANDS OF THESE AND I HAVE NEVER HAD A PROBLEM' AS IF IT WERE NOT ILLEGAL. AS A RESULT I WAS LEFT WITHOUT POWER FOR THE EVENING, BUT ALSO WITHOUT KNOWLEDGE OF OTHER POSSIBLE HAZARDS LIKE GAS OR WATER LINES. |
| Incident Date | 2/22/2023 3:00 PM |
| Incident State | CA |
| Incident County | Los Angeles |
| Incident Place | Los Angeles |
| Incident St from Address | 3767 |
| Incident St to Address | 3767 |
| Incident Street | Ashwood Ave |
| Incident Cross1 | |
| Incident Location | SINGLE FAMILY DWELLING, IN BACKYARD |
| Type of Complaint | Excavating without 811 ticket |
| Other Complaint Detail | NONE |
| Notification Number | C232120002 |
| Notification Created | 7/31/2023 6:48 PM |
| Notification Type | complaint |
| Damage Injury | Undefined |
| Damage Death | Undefined |
| Damage Fire Evacuation | Undefined |
| Damage Facility Type | |
| Damage Equipment | |

| Reporter Information | |
|---|---|
| Reporter First Name | Serena |
| Reporter Middle Name | |
| Reporter Last Name | Puga |
| Reporter Company | Serena Puga |
| Reporter Email | serenapugamd@gmail.com |
| Reporter Phone | 3109854770 |
| Reporter Address | 3767 Ashwood Ave |
| Reporter Address 2 | |
| Reporter City | Los Angeles |
| Reporter State | CA |
| Reporter Zip | 90066 |

| Other Party Information | |
|---|---|
| First Name | Michael |
| Middle Name | |
| Last Name | Horusicky |
| Company | Horusicky Construction |
| Address | PO Box 3789 |
| City | Palos Verdes |
| State | CA |
| Zip Code | 90274 |
| Email | mikehorusicky@yahoo.com |
| Phone | 3104544385 |

| Ticket Entry | |
|---|---|
| Ticket Number | |
| Ticket Type | |
| Revision | |
| Created | |
| Account | |
| Channel | |
| Work Date | |
| Response Required | |
| Response Due | |
| Expires | |
| One Year | |
| Priority | |
| Priority Number | |
| Category | |
| Lookup | |
| State | |
| County | |
| Place | |
| Work area zip code | |
| St to address | |
| St from address | |
| Street | |
| Cross 1 | |
| Cross 2 | |
| How delineated | |
| Excav st walk | |
| Work Type | |
| Boring | |
| Explosives | |
| Vacuum | |
| Permit | |
| Work Order | |
| Done For | |
| Remarks Type | |
| Company Name | |
| Address1 | |
| Address2 | |
| City | |

| | |
|---|---|
| State | |
| Zip Code | |
| Phone | |
| Phone ext | |
| Caller | |
| Caller Language | |
| Cell | |
| Email | |
| Contact Name | |
| Contact Phone | |
| Contact Phone Ext | |
| Contact Cell | |
| Contact Email | |
| Location | |
| Comments | |
| Map URL | MAP URL of Notification Number C232120002 |

# Ticket GPS Coordinates

| Caller GPS Coordinates | | |
|---|---|---|
| Name | Latitude | Longitude |

| Best Fit Rectangle GPS Coordinates | | |
|---|---|---|
| Name | Latitude | Longitude |

# Ticket Member List

| Member Code |
| --- |

# Exhibit 2

Home CONTRACTORS STATE LICENSE BOARD

# Contractor's License Detail for License # 309844

**DISCLAIMER: A license status check provides information taken from the CSLB license database. Before relying on this information, you should be aware of the following limitations.**

- CSLB complaint disclosure is restricted by law ( B&P 7124.6 ) If this entity is subject to public complaint disclosure click on link that will appear below for more information. Click here for a definition of disclosable actions.
- Only construction related civil judgments reported to CSLB are disclosed ( B&P 7071.17 ).
- Arbitrations are not listed unless the contractor fails to comply with the terms.
- Due to workload, there may be relevant information that has not yet been entered into the board's license database.

Data current as of 8/29/2025 3:51:05 PM

## Business Information

HORUSICKY CONSTRUCTION INC
P O BOX 3789
PALOS VERDES, CA 90274
Business Phone Number:(310) 544-9384

**Entity** Corporation
**Issue Date** 09/04/1975
**Reissue Date** 07/23/1996
**Expire Date** **07/31/2026**

## License Status

**This license is current and active.**

**All information below should be reviewed.**

## Classifications

- C29 - MASONRY
- C53 - SWIMMING POOL

## Bonding Information

Contractor's Bond

This license filed a Contractor's Bond with AMERICAN CONTRACTORS INDEMNITY COMPANY .
**Bond Number:** 100621912
**Bond Amount:** $25,000
**Effective Date:** 01/01/2023
Contractor's Bond History

Bond of Qualifying Individual

The qualifying individual MICHAEL HORUSICKY JR certified that he/she owns 10 percent or more of the voting stock/membership interest of this company; therefore, the Bond of Qualifying Individual is not required.
**Effective Date:** 04/11/2006
BQI's Bond History

## Workers' Compensation

This license has workers compensation insurance with the SECURITY NATIONAL INSURANCE COMPANY
**Policy Number:**SWC1540358
**Effective Date:** 03/18/2025
**Expire Date:** 03/18/2026
Workers' Compensation History

**Workers' compensation classification code(s):**
52052 - Concrete/Cement Work-high wage
5348 - Tile/Stone/Mosaic/Terrazzo Work

For a description of the workers' compensation classification code(s) listed for this licensee, contact the licensee's insurance carrier. Contact information for the licensee's insurer is available by clicking the insurer link above. Classification codes are also available on the Workers' Compensation Insurance Rating Bureau's classification search page.

**The board does not verify or investigate the accuracy of classification codes displayed.**

## Miscellaneous Information

- 07/23/1996 - LICENSE REISSUED TO ANOTHER ENTITY

## Other

- Personnel listed on this license (current or disassociated) are listed on other licenses.



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# Exhibit 3

**From:** Amber Dahl
**To:** McClenahan, Jeff@EnergySafety
**Subject:** RE: Underground Safety Board: Ticket request - 3767 Ashwood Avenue
**Date:** Tuesday, September 12, 2023 7:21:21 AM
**Attachments:** 3767 Ashwood Ave.pdf

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Thank you,


**Amber Dahl**, Safety Director

Underground Service Alert of Southern California (DigAlert)
PO Box 77070
Corona, CA 92877

O: (951) 808-8115 F: (951) 808-8101
E: amber@digalert.org W: www.digalert.org



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**From:** McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
**Sent:** Monday, September 11, 2023 4:31 PM
**To:** Amber Dahl <amber@digalert.org>
**Subject:** Underground Safety Board: Ticket request - 3767 Ashwood Avenue

Hi Amber,

Could you please provide copies of any tickets that were created at 3767 Ashwood Avenue in Los Angeles 90066 in 2022 and 2023?

Thanks for your help!

Best,


**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division

Office of Energy Infrastructure Safety
715 P Street, 20th Floor

Sacramento, CA 95814
(279) 789-1818
EnergySafety.ca.gov

# Underground Service Alert

of Southern California™

September 12, 2023

Jeff McClenahan
Underground Safety Board
715 P St, 20th Floor
Sacramento, CA 95814

**File Number: Unknown**

Dear Jeff,

After searching our records from 1/1/22 through 9/11/23, we found the following DigAlert ticket(s) A230540009 for the location at 3767 Ashwood Ave in Los Angeles. I hope this information will be helpful.

If we can be of further assistance, please call us at 951-808-8100.

Sincerely,

Amber Dahl
Safety Awareness Director

**Ticket: A230540009-00A**

MBRCOD 00001B USAS 09/12/23 07:15:46 A230540009-00A NEW NORM POLY LREQ

Ticket: A230540009 Rev: 00A Created: 02/23/23 06:10 User: LAR Chan: 100

Work Start: 02/27/23 17:01 Legal Start: 02/27/23 17:01 Expires: 03/23/23 23:59
Response required: Y Priority: 2

Excavator Information
Company: HORUSICKY CONSTRUCTION INC Type: CONT
Co Addr: 6054 FLAMBEAU RD
City : RANCHO PALOS VERDES State: CA Zip: 90275
Created By: MIKE HORUSICKY Language: ENGLISH
Office Phone: 310-261-5923 SMS/Cell: 310-261-5923
Office Email: MIKEHORUSICKY@YAHOO.COM

Site Contact: MIKE HORUSICKY
Site Phone: 310-261-5923 Site SMS/Cell:
Site Email:

Excavation Area
State: CA County: LOS ANGELES Place: LOS ANGELES
Zip: 90066
Address : 3767 Street: ASHWOOD AVE
Cross 1 : LUCILLE AVE
Cross 2 :
Location: B-YARD **DELINEATED WITH LUMBER** **AREA WILL BE DELINEATEDIN
: WHITE BY 6:30 AM**
Searchable Tags:
Job size: sq-feet: 45700 sq-miles: 0.001639

Delineated Method: NONE
Work Type: INSTALL SWIMMING POOL
Work For : H/O PUGA, SERENA
Permit: 22030100001597 Job/Work order:
Project ID:
Project Name:
1 Year: N Boring: N Street/Sidewalk: N Vacuum: Y Explosives: N Pavement Only: N

Lat/Long
Center Generated (NAD83): 33.999003/-118.446371 33.999404/-118.445629
: 33.998501/-118.446099 33.998903/-118.445357
Excavator Provided:

Map link:
https://newtin.digalert.org/newtinweb/map_tkt.nap?TRG=EF9v3x1Fi8jGZJi-F

Members:
CITYLASTLI CRMSNPIP LAWP3 LCW04 SCG3Z6 UCHTRW_N1 USCEMW

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**Ticket Responses for: A230540009-00A**

| Member | Name | Rev | Responded | By | Response | Comment |
|---|---|---|---|---|---|---|
| CITYLASTLI | CITY OF LOS ANGELES | 00A | 02/23/23 06:11:42 AM | AAA | (001) CLEAR - NO CONFLICT | Auto Processed per Facility Location |
| CRMSNPIP | CRIMSON PIPELINE LP | 00A | 02/23/23 06:33:19 AM | AAA | (001) CLEAR - NO CONFLICT | Work has been determined no conflict from a remote location. |
| LAWP3 | LADWP - WATER | 00A | 02/27/23 12:06:52 PM | TMS:LRICHARDSON | (001) CLEAR - NO CONFLICT | |
| LCW04 | LA COUNTY WTR WORKS | 00A | 02/23/23 03:59:13 PM | L V | (002) CLEAR - NO CONFLICT BUT PRIVATELY OWNED UTILITY ON PROPERTY - CONTACT PRIVATE UTILITY OWNER FOR LOCATE | |
| SCG3Z6 | SOCALGAS DISTRIBUTION SANTA MONICA | 00A | 02/24/23 09:08:19 AM | PRSDG01 AMANDRAD | (001) CLEAR - NO CONFLICT | |
| UCHTRW_N1 | SPECTRUM - ARIZONA CIRCLE | 00A | 02/23/23 08:01:31 AM | UQ Responder | (001) CLEAR - NO CONFLICT | |
| USCEMW | UTILIQUEST FOR SCE DIST METRO WEST | 00A | 02/23/23 08:01:31 AM | UQ Responder | (001) CLEAR - NO CONFLICT | |

# Exhibit 4

| | |
|---|---|
| **From:** | Joseph G. McGuinness |
| **To:** | McClenahan, Jeff@EnergySafety |
| **Cc:** | Jeff Flashman; mikehorusicky@yahoo.com |
| **Subject:** | RE: File No. C232120002 - Horusicky Construction, Inc. |
| **Date:** | Thursday, December 7, 2023 2:45:29 PM |
| **Attachments:** | C36157F767564414966D72552217FE43.png<br>tb_trench (002).pdf |

You don't often get email from joe@mcguinnesslawgroup.com. Learn why this is important

Good afternoon Mr. McClenahan,

We have consulted with Horusicky Construction, Inc. ("HCI") and provide the following responses to your questions. We do appreciate your patience.

**1. What date did HCI begin excavating for the pool?**

On February 23, 2023, HCI issued a request for a Dig Alert report.

The Dig Alert reported an entirely clear project site bearing no electrical lines and a clear digging condition. A tree existed in the middle of the area where the pool would be built. An issue arose when HCI removed this tree and a homeowner wire was displaced. Consequently, the owner terminated the contract before project work was completed.

**2. Did HCI damage the electrical line?**

When the tree was pulled out, it was intertwined with a very shallow electrical line. When HCI pulled a root of the tree that was intertwined with that electrical line, the line was damaged.

HCI used shovels to expose the rest of the 1/2" line and pulled out any wires. The electrical line was running directly through the middle of the planned pool. This line would have needed to be completely relocated anyway since it was running through the pool.

**3. What equipment was HCI using when they damaged the electrical line?**

A Bobcat E 20 Excavator was used to remove the tree.

**4. What employees of HCI were doing the work?**

Roberto Arriaga and Jose Moreno were the employees that performed the tree removal.

**5. What was the date and approximate time of the damage to the electrical line?**

The tree and the entangled electrical line were both removed on February 22, 2023 at approximately 2:00 p.m.

**6. How would HCI describe the electrical line? Diameter, type, materials, etc...**

Electrical line, 1/2" in diameter, 110 power. It looked looked like a handyman installed the line since it was only 2 inches deep no and had no glue at joints. The only item this line was feeding was a space heater in the garage.

**7. Are there any further photos that HCI can provide?**

Additional photographs are below.

**8. How did HCI determine this was a private electrical line?**

Dig alert confirmed there were no utilities running through the pool area. The main electrical lines were overhead and clearly visible. The gas line was only located in the front yard. The planned pool was located in the backyard.

We are also attaching a copy of the underground procedures that HIC uses, which is a n Excavation Safety publication by the California Department of Industrial Relations, Division of Occupational Safety and Health. HCI seeks to have current requirements available to employees to help to direct its underground procedures.

Please let us know if you have any additional questions. Thank you.

Best regards,

Joe







Joseph G. McGuinness
McGuinness & Associates
2785 Pacific Coast Highway, Suite E #729
Torrance, CA 90505
Joe@mcguinnesslawgroup.com
Phone: 310-792-0495

**From:** McClenahan, Jeff@EnergySafety
**Sent:** Monday, November 27, 2023 8:58 AM
**To:** mikehorusicky@yahoo.com
**Cc:** Jeff Flashman; Joseph G. McGuinness
**Subject:** RE: File No. C232120002 - Horusicky Construction, Inc.

Hi Mike, Joe, and Jeff,

I'm following up on these questions. I may still have some follow-ups, still I think if you can provide written responses then I can close this out.

Please send a response by December 13, 2023 to cooperate with this investigation and see the 2nd notice of my information request from October 9, 2023.

I'm looking to understand all of the following:

- What date did Horusicky Construction, Inc. (HCI) begin excavating for the pool?
- Did HCI damage the electrical line?
- What equipment was HCI using when they damaged the electrical line?
- What employees of HCI were doing the work?
- What was the date and approximate time of the damage to the electrical line?
- How would HCI describe the electrical line? Diameter, type, materials, etc...
- Are there any further photos that HCI can provide?
- How did HCI determine this was a private electrical line?

Thanks,

**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

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**From:** McClenahan, Jeff@EnergySafety
**Sent:** Monday, November 20, 2023 8:34 AM
**To:** Joseph G. McGuinness <joe@mcguinnesslawgroup.com>
**Cc:** Jeff Flashman <jeff@mcguinnesslawgroup.com>
**Subject:** RE: File No. C232120002 - Horusicky Construction, Inc.

Hi Joe and Jeff,

Just following up on these questions to Horusicky Construction. Could you please provide an update?

**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

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**From:** McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
**Sent:** Wednesday, November 1, 2023 12:22 PM
**To:** Joseph G. McGuinness <joe@mcguinnesslawgroup.com>
**Cc:** Jeff Flashman <jeff@mcguinnesslawgroup.com>
**Subject:** Re: File No. C232120002 - Horusicky Construction, Inc.

I think written responses could work if you are able to provide those policies and procedures from HCI.

My agency is only looking at Government Code 4216 and to understand what happened in this case with respect to the USA Ticket and any excavation that took place.

So here are my questions at the moment:

- What date did HCI begin excavating for the pool?
- Did HCI damage the electrical line?
- What equipment was HCI using when they damaged the electrical line?
- What employees of HCI were doing the work?
- What was the date and approximate time of the damage to the electrical line?
- How would HCI describe the electrical line? Diameter, type, materials, etc...
- Are there any further photos that HCI can provide?
- How did HCI determine this was a private electrical line?

Thanks for your time,

**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

**From:** Joseph G. McGuinness <joe@mcguinnesslawgroup.com>
**Sent:** Tuesday, October 31, 2023 4:08 PM
**To:** McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
**Cc:** Jeff Flashman <jeff@mcguinnesslawgroup.com>
**Subject:** RE: File No. C232120002 - Horusicky Construction, Inc.

Good afternoon Mr. McClenahan,

The primary contact for Horusicky Construction, Inc. ("HCI") is Mike Horusicky. We understand that he is out of the country for the next two weeks.

Given the harassing nature of the complaints made by Ms. Puga, who has also initiated claims with the Contractors State License Board and the surety for HCI's license bond, we would prefer that our client respond to any questions you have in writing. If you present the questions, we can work with Mr. Horusicky, even while he is away, to prepare written responses to the questions.

Our firm will also inquire with HCI about its written policies and procedures for requests to Dig Alerts.

Please let me know if you have any questions concerning the foregoing.

Best regards,

Joe

Joseph G. McGuinness
McGuinness & Associates
2785 Pacific Coast Highway, Suite E #729
Torrance, CA 90505
Joe@mcguinnesslawgroup.com
Phone: 310-792-0495

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**From:** McClenahan, Jeff@EnergySafety
**Sent:** Tuesday, October 31, 2023 10:03 AM
**To:** Patrice McDonald
**Cc:** Joseph G. McGuinness; Jeff Flashman; mikehorusicky@yahoo.com
**Subject:** RE: File No. C232120002 - Horusicky Construction, Inc.

Just following up on this since I have not heard from you; I would like to speak with Mr. Horusicky and see the HCI written policies and procedures.

I'd like to accommodate your schedule and Mr. Horusicky's, so if you have a good time please let me know, otherwise I will set up a time.

Thanks,

**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

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**From:** McClenahan, Jeff@EnergySafety
**Sent:** Monday, October 23, 2023 8:47 AM
**To:** Patrice McDonald <patrice@mcguinnesslawgroup.com>
**Cc:** Joseph G. McGuinness <joe@mcguinnesslawgroup.com>; Jeff Flashman <jeff@mcguinnesslawgroup.com>
**Subject:** RE: File No. C232120002 - Horusicky Construction, Inc.

Hi All,

I do have a few follow up questions that I would like to speak to Mr. Horusicky about, basically looking to understand HCI's excavation procedures, how the utility was cut, and when HCI created the USA Ticket A230540009.

I'd also like to request a copy of HCI's written policies and procedures on the USA Ticket.

Could you setup a phone interview or teleconference by MS Teams? I imagine it would be only a 30-minute call.

**Jeff McClenahan** (He/him)
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

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**From:** Patrice McDonald <patrice@mcguinnesslawgroup.com>
**Sent:** Friday, October 20, 2023 12:12 PM
**To:** McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
**Cc:** Joseph G. McGuinness <joe@mcguinnesslawgroup.com>; Jeff Flashman <jeff@mcguinnesslawgroup.com>
**Subject:** File No. C232120002 - Horusicky Construction, Inc.

You don't often get email from patrice@mcguinnesslawgroup.com. Learn why this is important

Please see the attached correspondence from Joseph McGuinness. Thank you.

Best regards,

Patrice

Patrice McDonald
McGuinness & Associates
2785 Pacific Coast Highway, Suite E #729
Torrance, CA 90503
patrice@mcguinnesslawgroup.com
Phone: 310-792-0495

# Exhibit 5

**MCGUINNESS & ASSOCIATES**
2785 Pacific Coast Highway, Suite E #729
Torrance, California 90505
Tel: (310) 792-0495

October 20, 2023

**Via Electronic Mail**
Jeff.McClenahan@energysafety.ca.gov

Jeff McClenahan
Investigator
Underground Investigations Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: *Horusicky Construction Inc.*
Claimant: Serena Puga
File No. C232120002

Dear Mr. McClenahan:

This law firm has been engaged to pursue and protect the rights of Horusicky Construction Inc. ("HCI") with respect to the multiple meritless claims asserted by Serena Puga. We note, as a preliminary matter, that we have responded to claims asserted by Ms. Puga to both the Contractors State License Board ("CSLB") and HCI's Contractor's License Bond surety ("Surety"). Ms. Puga's vendetta has yet to yield any support for her outlandish claims.

As you may be aware, Ms. Puga hired HCI to design and construct a swimming pool at Ms. Puga's residence (the "Project"). Because of the numerous efforts undertaken by Ms. Puga, we are well aware of the "evidence" that she has provided to support her claims. While we are unaware of the specific evidence that was provided to your agency, this correspondence will assume that the same documentation has been provided to you as was provided to the CSLB and Surety.

## 1. Meritless "Contractor" Report

The bulk of the "evidence" provided to HCI as alleged support for Ms. Puga's claim is a report by Coastal Building Company ("CBC"). CBC is not a swimming pool contractor, but a general contractor which currently possesses a **probationary license** issued pursuant to Business and Professions Code Section 7073(e) from the Contractors State License Board. As you may be aware, a probationary license is issued to an applicant who has a history of criminal conduct.

In this instance, a person with the same name as the qualifying individual for CBC has been convicted of the following offenses: (1) being a convicted felon and drug addict in possession of a firearm; (2) possession/sale of marijuana; (3) prescription drug fraud; and (4)

burglary. There has been no explanation for CBC's probationary status or the conduct that limits the nature of its license. For this reason alone, the entire report from CBC should be significantly discounted, if not completely ignored.

Moreover, as noted, CBC is not a swimming pool contractor. CBC's probationary license became effective August 19, 2022. It is likely that CBC has, in that period, never been involved in a swimming pool project. The fact that Ms. Puga could find only a non-swimming pool contractor with questionable credentials to support her positions, exemplifies the meritless nature of her claims.

Moreover, a C-53 swimming pool specialty contractor's license is required for the renovation or building of a swimming pool and spa. As the CSLB's publication "Before You Dive In: A Consumer Guide to Swimming Pool Construction" states:

> California state law requires a valid license issued by the Contractors State License Board (CSLB), in the field of work that will be performed, for any contracting job of $500 or more. [¶] Swimming pools, spas and hot tubs can be built by contractors with a C-53 Swimming Pool contractor license. [¶] A General Building "B" contractor and a C-27 Landscape contractor may also contract for swimming pool work, **provided they hold the swimming pool specialty classification, or they enter into a subcontract with a licensed C-53 Swimming Pool specialty contractor to perform the actual work.**

Given the above, the CBC report should be given no weight. Should this matter proceed to litigation, CBC will not be qualified to provide any opinion in a court of law.

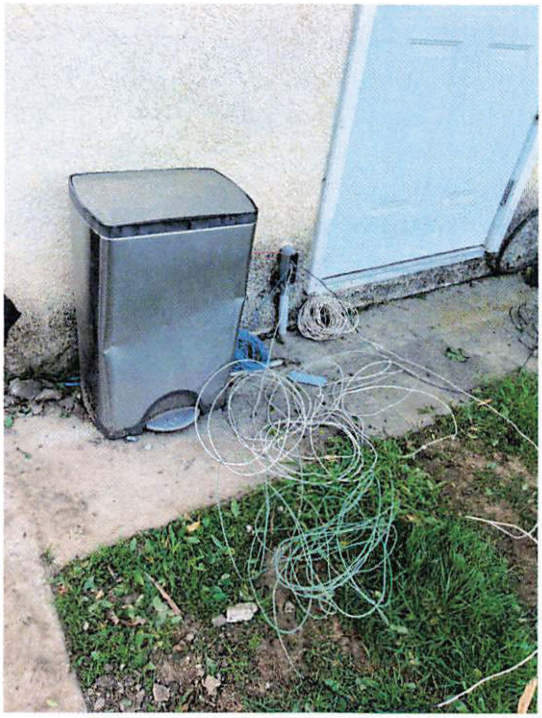
**2. <u>Underground Service Alert</u>**

HCI obtained a Dig Alert ticket, which only marks the location of material owned by public utilities. Generally, the material owned by public utilities ends at the property line of a private residence.

Ms. Puga asserts that electrical lines were cut during the initial excavation of the pool. These electrical lines were private lines installed by the homeowner. Our investigation indicates that the line that was damaged during the installation was likely installed by the homeowner without a permit.

Ms. Puga failed to alert HCI of the existence of these private electrical lines. A Dig Alert ticket would not have identified these resident-owned lines to HCI. Further, Ms. Puga would have been responsible for the cost of moving electrical lines that ran through the area where her pool was being constructed.

The electrical line that HCI cut were installed only three inches deep. These lines ran through the center of the planned pool, and would have needed to be rerouted around the outside of the pool. Once HCI removed the line, HCI provided a replacement line.



The above picture depicts the electrical line that was cut, and in question in this matter.

Moreover, HCI was on site the day after it encountered these lines. HCI reset the breakers that tripped when the line was cut, and restored Ms. Puga's power. HCI also connected a replacement electrical line to allow power to the area disrupted by the line being cut.

Apparently neither Ms. Puga nor CBC understand the Dig Alert data bank and/or its usage process.

**4. <u>Conclusion</u>**

HCI denies all of the claims asserted by Ms. Puga. If Ms. Puga proceeds in any forum, HCI intends to respond with a counterclaim.

If you have any questions about the foregoing, please feel free to contact me.

Best regards,

Joseph G. McGuinness
McGUINNESS & ASSOCIATES

# Exhibit 6

Phone Interview – Investigator McClenahan

Serena Puga

September 19, 2023 at 12:10 p.m.

**What happened? Because it looks like a ticket was created about that time.**
They excavated the electrical and said to me that never gets DigAlert tickets for this work. Have copies of text messages on that. Power is still out in the garage because that is the line that he cut.

**Since February?**
And still don't have power in the garage, yes.

**What date was this the damage?**
It was Ash Wednesday because came back from mass, so Wednesday February 22.

**What happened?**
Was out of the house and one of the days that was excavating, and I came home and power was out in part of the house. So went back to look at fuses and the fuse was cut and could see line had been cut with clippers. So didn't have power in the house. So contacted Mr. Horusicky to say lines had been cut.

Believe emailed him that night too and called. Finally got back to me and had a separate contractor friend mention this thing about a DigAlert ticket was the f first I had heard of it.

Horusicky started to tell me that the lines had not been cut, that had been pulled out because of the machine that was excavating. And I was telling that was clearly cut.

Came over and restored power to the inside of the house. Mentioned DigAlert and looked at me with suprrise and backpedaled about how never got DigTickets on any job and never had to this.

Took a power cord and extended a power line in to the garage so had a basic on/off switch in the garage but that is all that is there. And a bunch of piping that was covering the electrical that was laying there in the ditch. And had no real plans for anything or if there was any further hazard or gas line or anything back there.

Had rerouted power to the garage from a junction box outside.

Excavated into public utility easement as well. And did not get an encroachment permit there. Fired him because was a safety hazard. And now stuck in this process of figuring out this process of what I need to do to get in compliance.

**Ripped from fuse box, is that right?**
Pulled from line because of pressure of machine. I'm not really sure about that and seem like got into a situation. Not really clear on what they were doing.

**What kind of tools or equipment were they using?**
Have that in the text messages and can send that to you.

**Do you have photos of the trench or anything like that?**
Have trench, fuses, and basically everything.

**Is there anything else you'd like to share?**
No, just dealing with CSLB and DWP and all that still from this.

# Exhibit 7

**From:** Serena Puga
**To:** McClenahan, Jeff@EnergySafety
**Subject:** Re: Underground Safety Board: Case Announcement C232120002
**Date:** Tuesday, September 26, 2023 11:07:12 AM

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Here are more photos, they are in sequence and numbered

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**Appointments canceled less than 48 business hours in advance will be billed at full fee.**

Sent via Superhuman

On Mon, Sep 25, 2023 at 1:32 PM, Serena Puga <serenapugamd@gmail.com> wrote:

> Hi Jeff,
>
> Sending these jpegs of our text exchange the evening of Feb 22,
> I will send additional photos as well from my home computer,
>
> thank you for your patience
>
> On Mon, Sep 25, 2023 at 1:27 PM McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov> wrote:
>
> > Hi Serena,
> >
> > Could you please send over all the documentation you have with your complaint by the end of the week, and then I can proceed with this investigation.
> >
> > Thanks for bringing this to the Board's attention.
> >
> > Best,
> >
> > **Jeff McClenahan** (He/him)

Investigator | Underground Investigations Division

(279) 789-1818

Office of Energy Infrastructure Safety

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**From:** Serena Puga <serenapugamd@gmail.com>
**Sent:** Monday, September 18, 2023 9:59 AM
**To:** McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
**Subject:** RE: Underground Safety Board: Case Announcement C232120002

Hi Jeff,

I am not sure how I didn't receive this, but the 12th has passed and I've just received this. When are you available?

Thanks

Serena Puga

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**Appointments canceled less than 48 business hours in advance will be billed at full fee.**

Sent via Superhuman iOS

On Mon, Sep 18 2023 at 9:10 AM, Jeff@EnergySafety McClenahan <Jeff.McClenahan@energysafety.ca.gov> wrote:

> Hi Serena,

Just checking in -- is there a good time to have a quick conversation about your complaint?

I'd also like to discuss if you have any documentation of this pool project such as dates, contract, etc…

Best,

**Jeff McClenahan** (He/him)

Investigator | Underground Investigations Division

(279) 789-1818

Office of Energy Infrastructure Safety

---

**From:** McClenahan, Jeff@EnergySafety
**Sent:** Friday, September 8, 2023 10:21 AM
**To:** serenapugamd@gmail.com
**Subject:** Underground Safety Board: Case Announcement C232120002

Hi Serena,

I've been assigned to investigate a complaint you submitted to the Underground Safety Board regarding an electrical dig-in at your residence from February of this year.

I've phoned a couple times and not reached you, so please let me know a good day to schedule an interview.

I'm available next Tuesday the 12  just about any time if that is a good day, for instance.

Looking forward to speaking with you soon,

**Jeff McClenahan** (He/him)

Investigator | Underground Investigations Division

Office of Energy Infrastructure Safety

715 P Street, 20th Floor

Sacramento, CA 95814

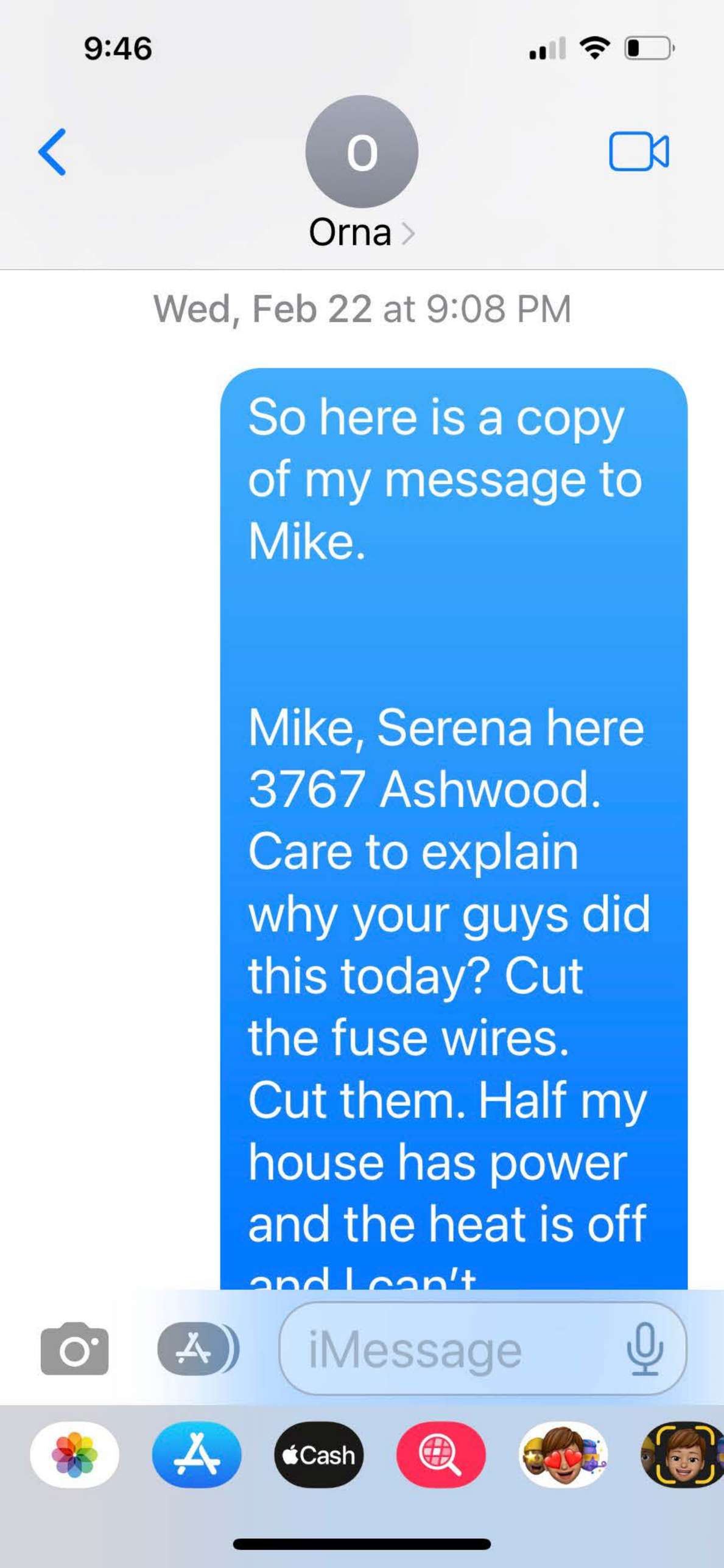
(279) 789-1818

EnergySafety.ca.gov

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**Appointments canceled less than 48 business hours in advance will be billed at full fee.**


9:46
O
Orna
Wed, Feb 22 at 9:08 PM
So here is a copy of my message to Mike.
Mike, Serena here 3767 Ashwood. Care to explain why your guys did this today? Cut the fuse wires. Cut them. Half my house has power and the heat is off
iMessage
Cash

this today? Cut the fuse wires. Cut them. Half my house has power and the heat is off and I can't shower.
Initially they had just pulled them out and try to jam them back in.
Today they decided I don't need power

IM
G

just pulled them out and try to jam them back in. Today they decided I don't need power



9:47

O

Orna



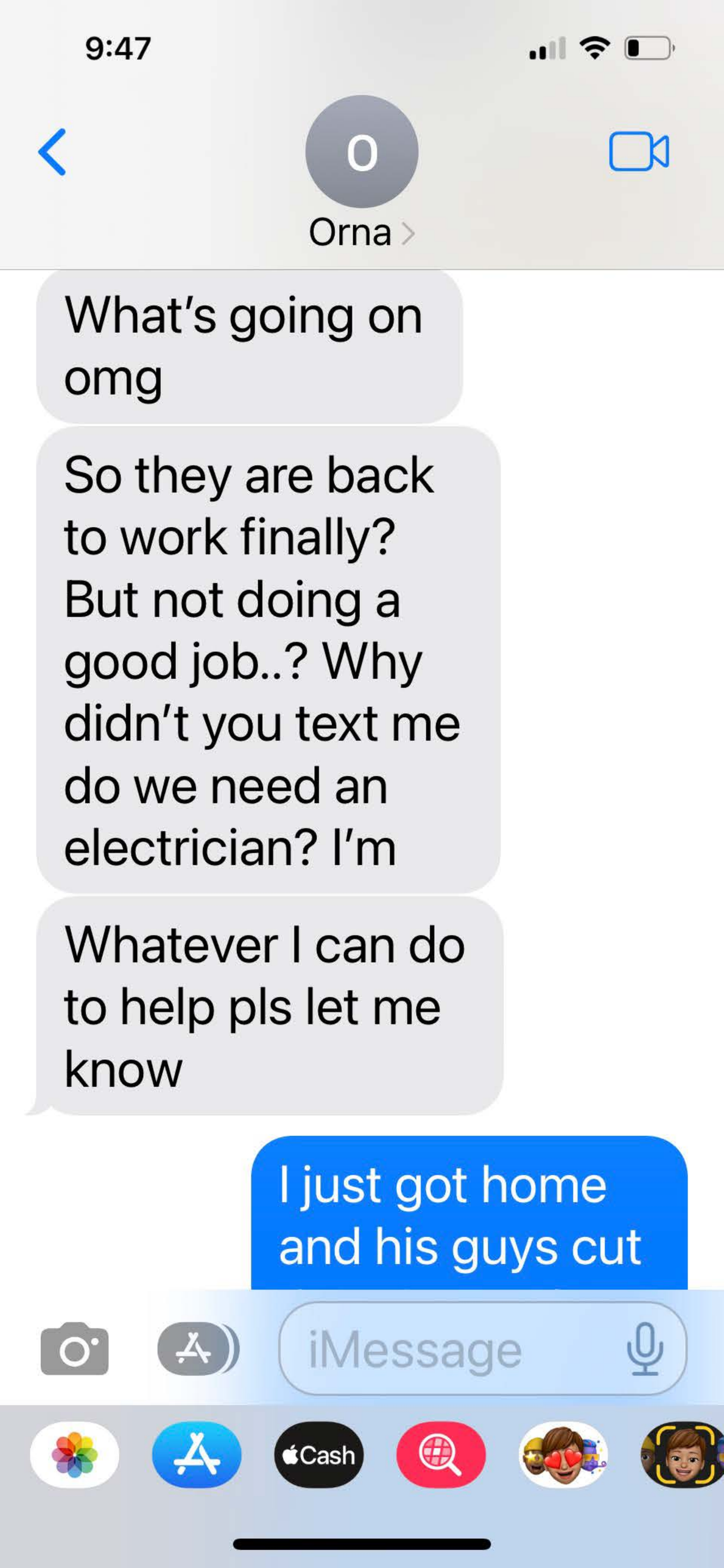


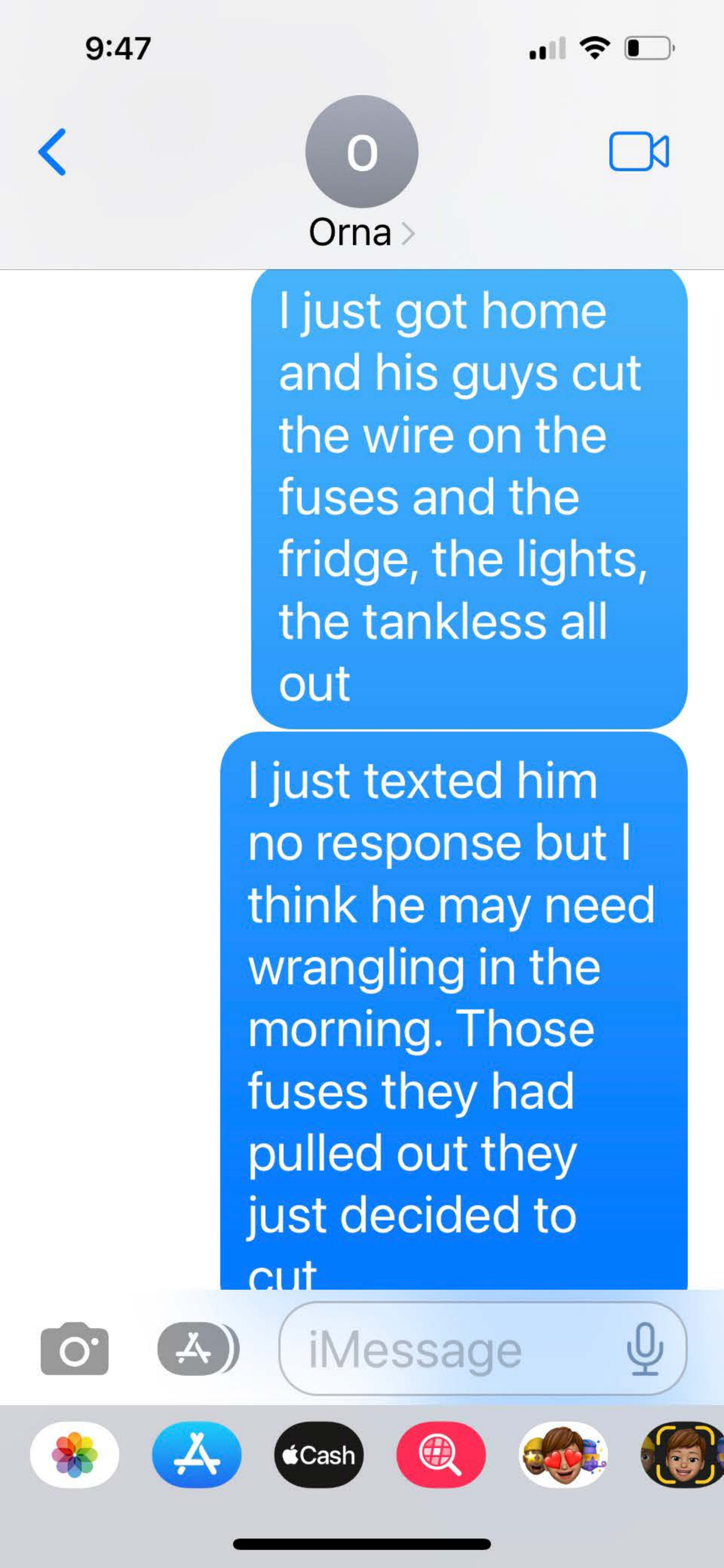

What's going on omg

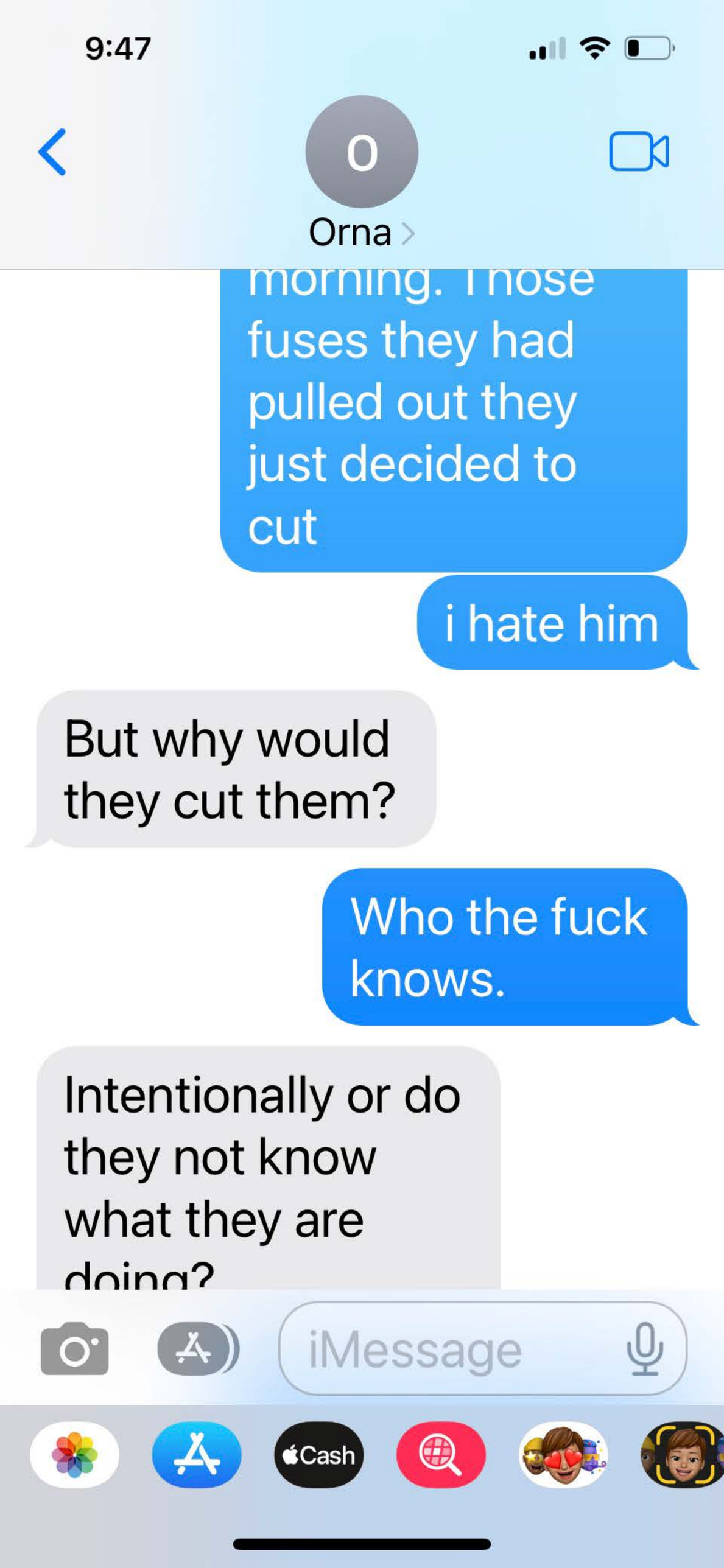
So they are back to work finally?

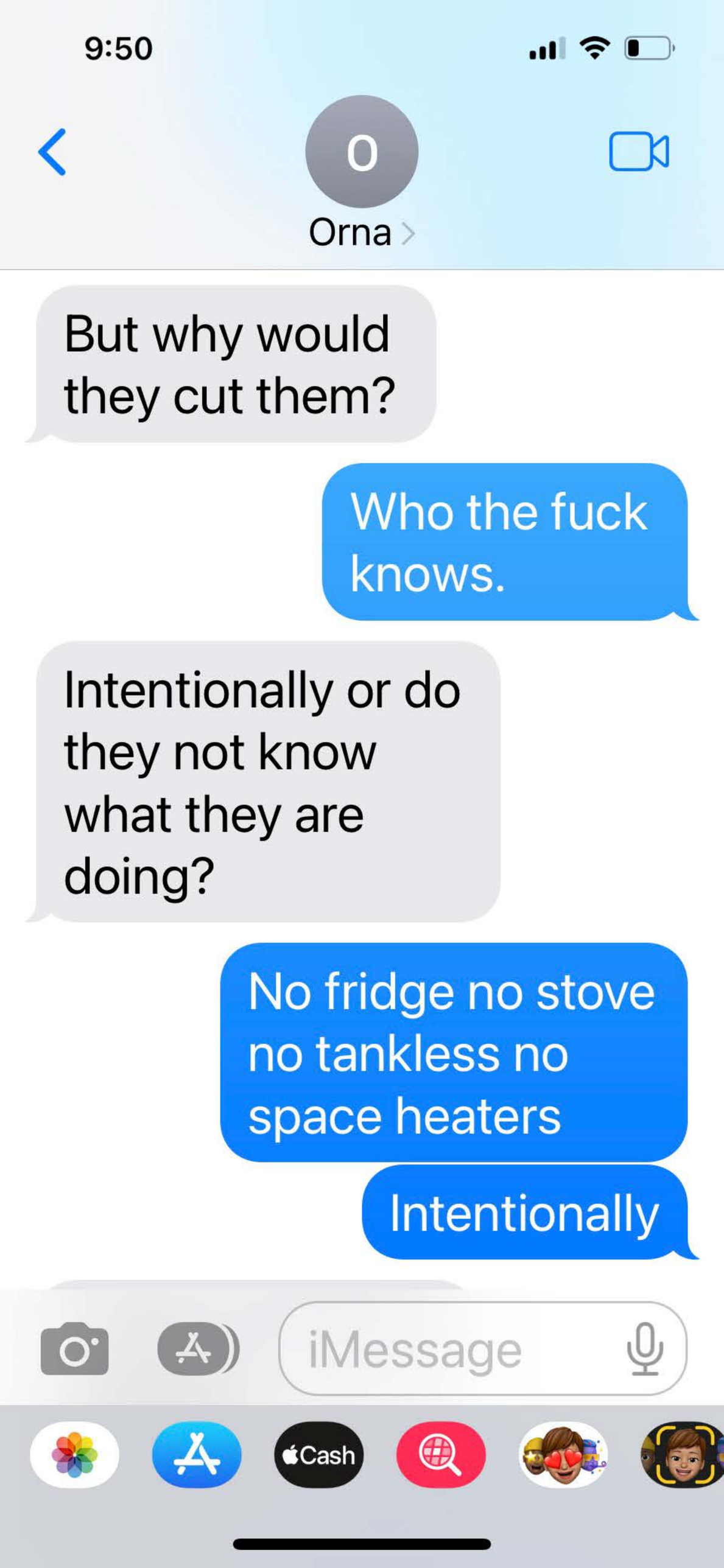
But not doing a

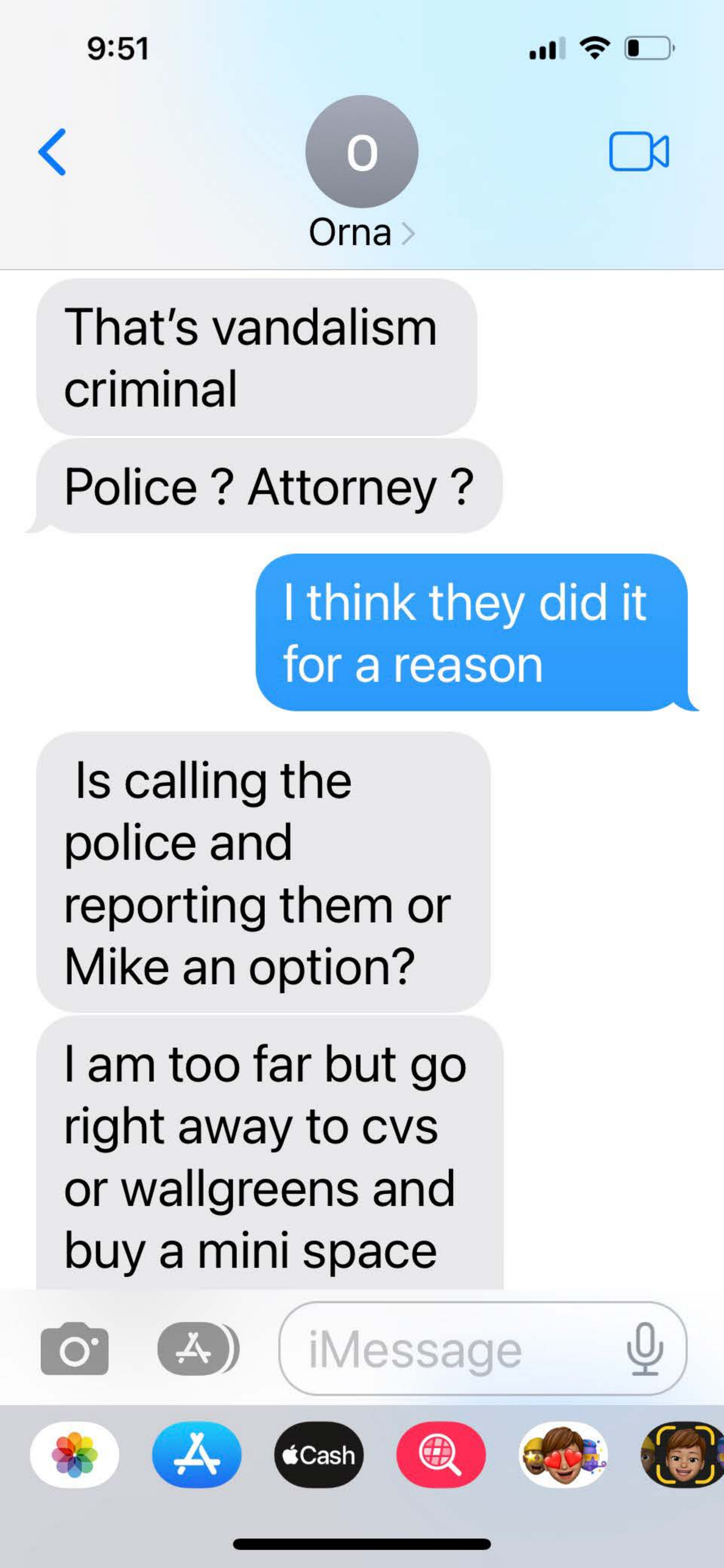
iMessage


9:47
O
Orna
What's going on omg
So they are back to work finally? But not doing a good job..? Why didn't you text me do we need an electrician? I'm
Whatever I can do to help pls let me know
I just got home and his guys cut
iMessage
Cash

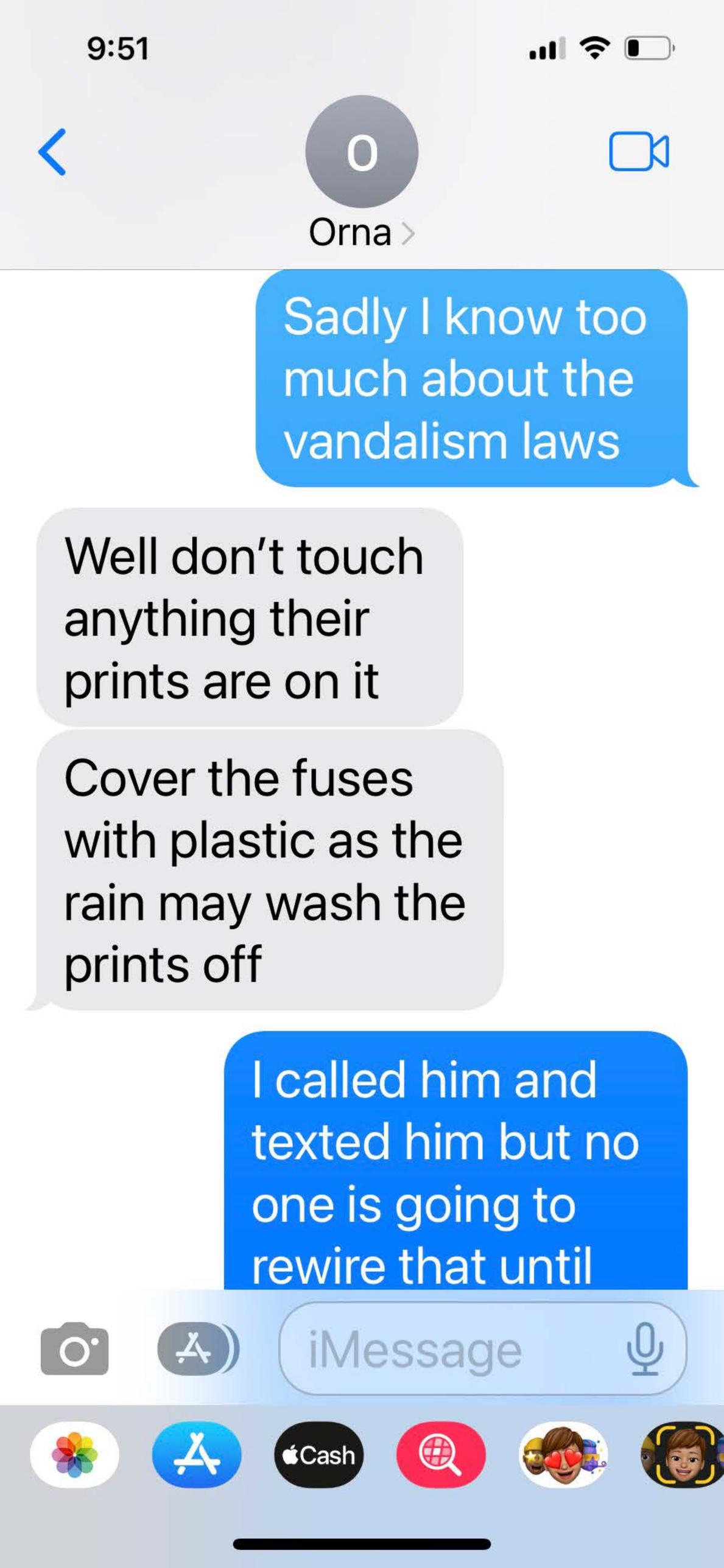

9:47
O
Orna
I just got home and his guys cut the wire on the fuses and the fridge, the lights, the tankless all out
I just texted him no response but I think he may need wrangling in the morning. Those fuses they had pulled out they just decided to cut
iMessage
Cash

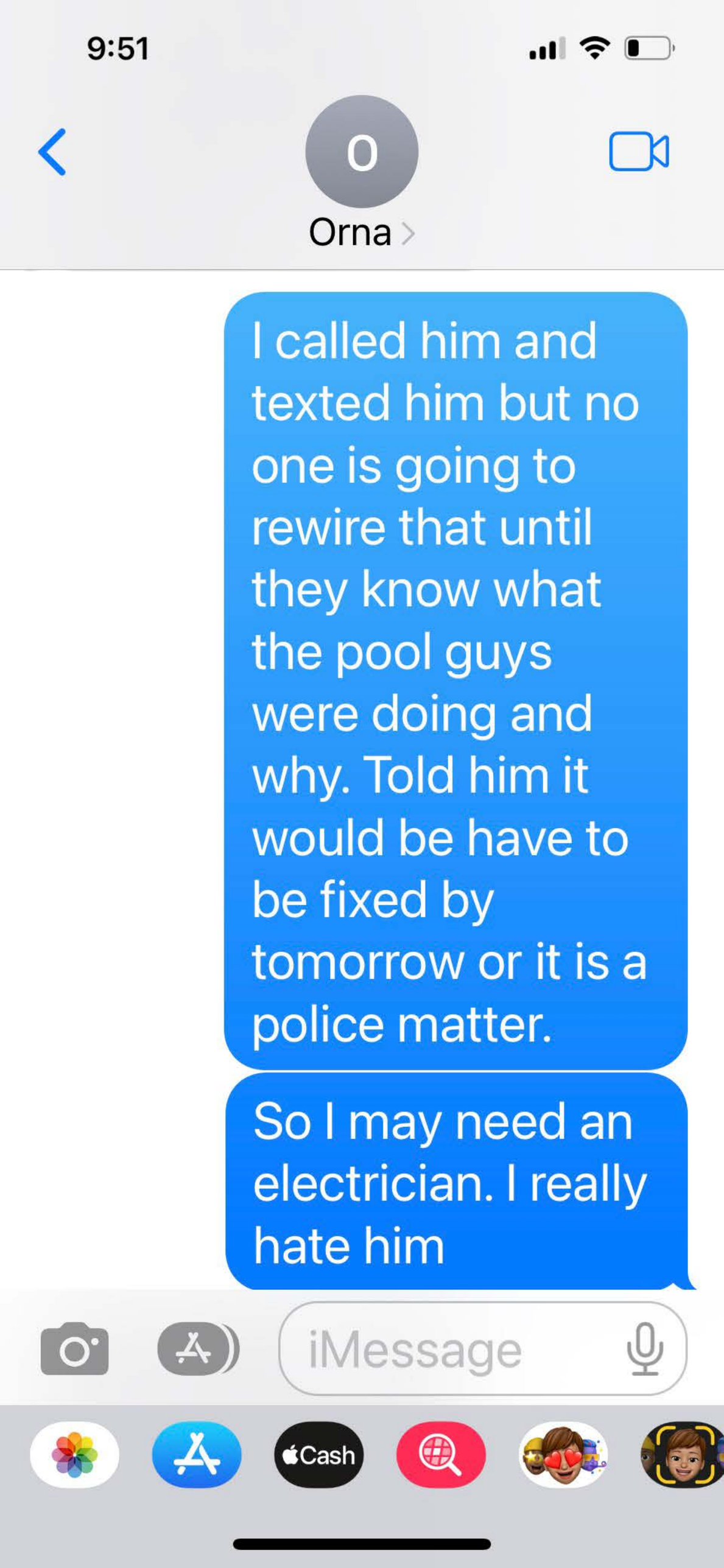

9:47
O
Orna
morning. Those fuses they had pulled out they just decided to cut
i hate him
But why would they cut them?
Who the fuck knows.
Intentionally or do they not know what they are doing?
iMessage
Cash

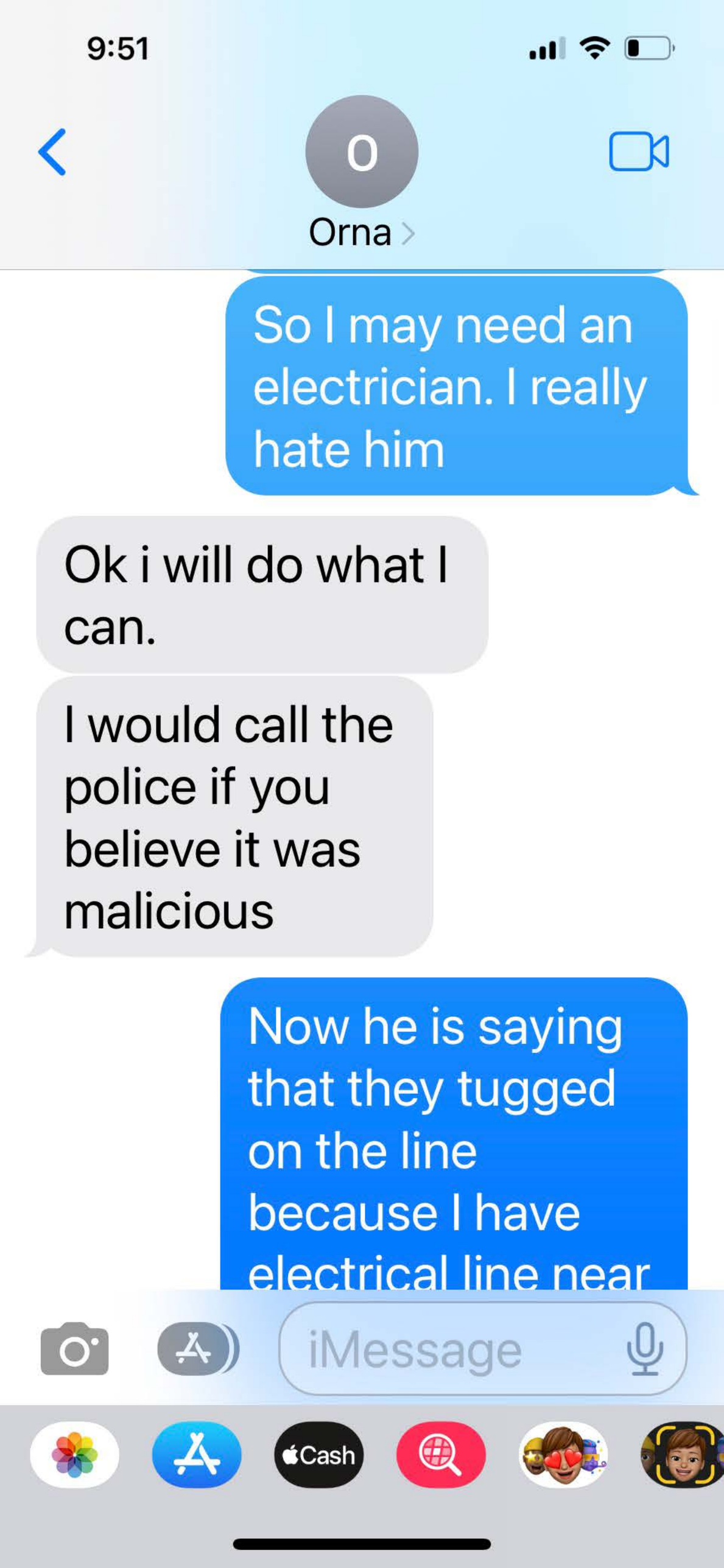

9:50
O
Orna
But why would they cut them?
Who the fuck knows.
Intentionally or do they not know what they are doing?
No fridge no stove no tankless no space heaters
Intentionally
iMessage
Cash

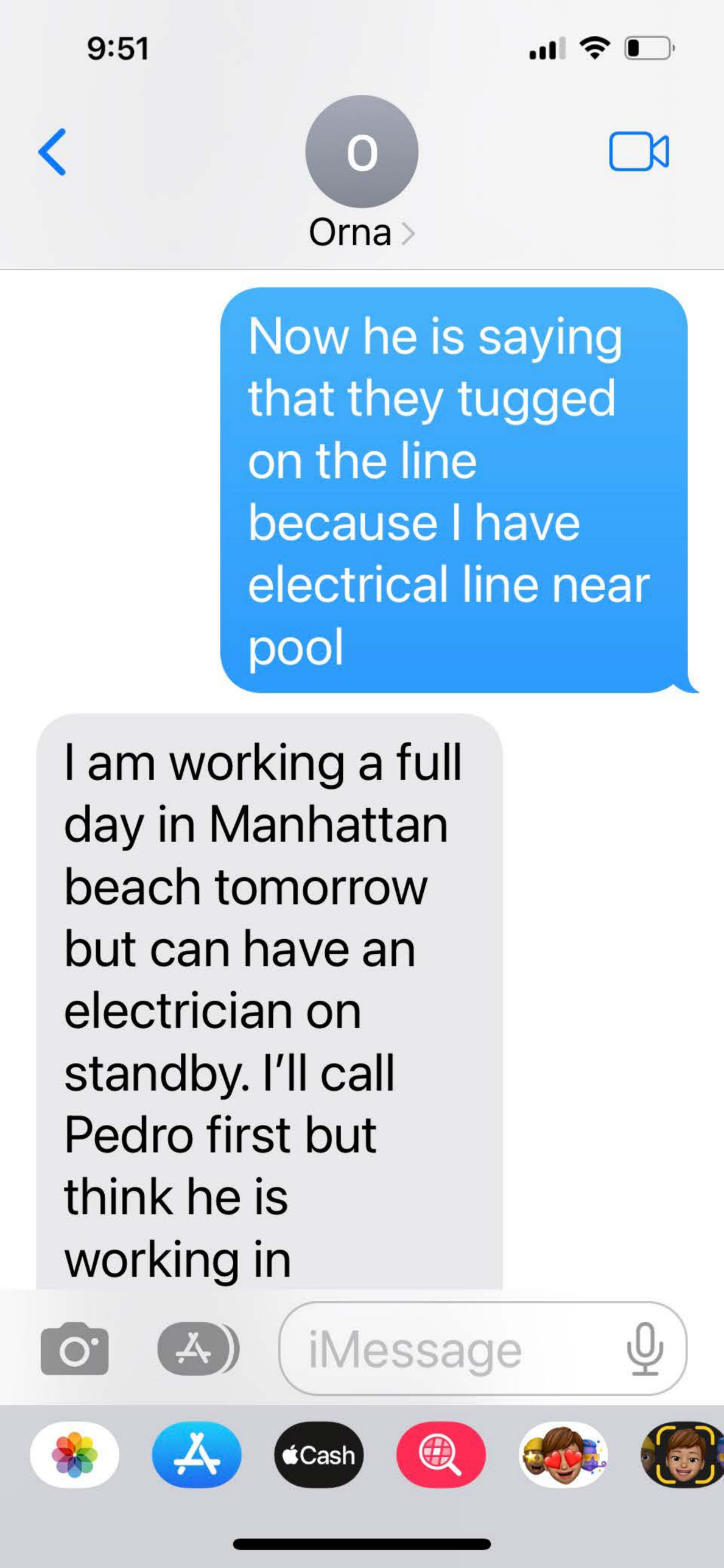

9:51
O
Orna
That’s vandalism criminal
Police ? Attorney ?
I think they did it for a reason
Is calling the police and reporting them or Mike an option?
I am too far but go right away to cvs or wallgreens and buy a mini space
iMessage
Cash

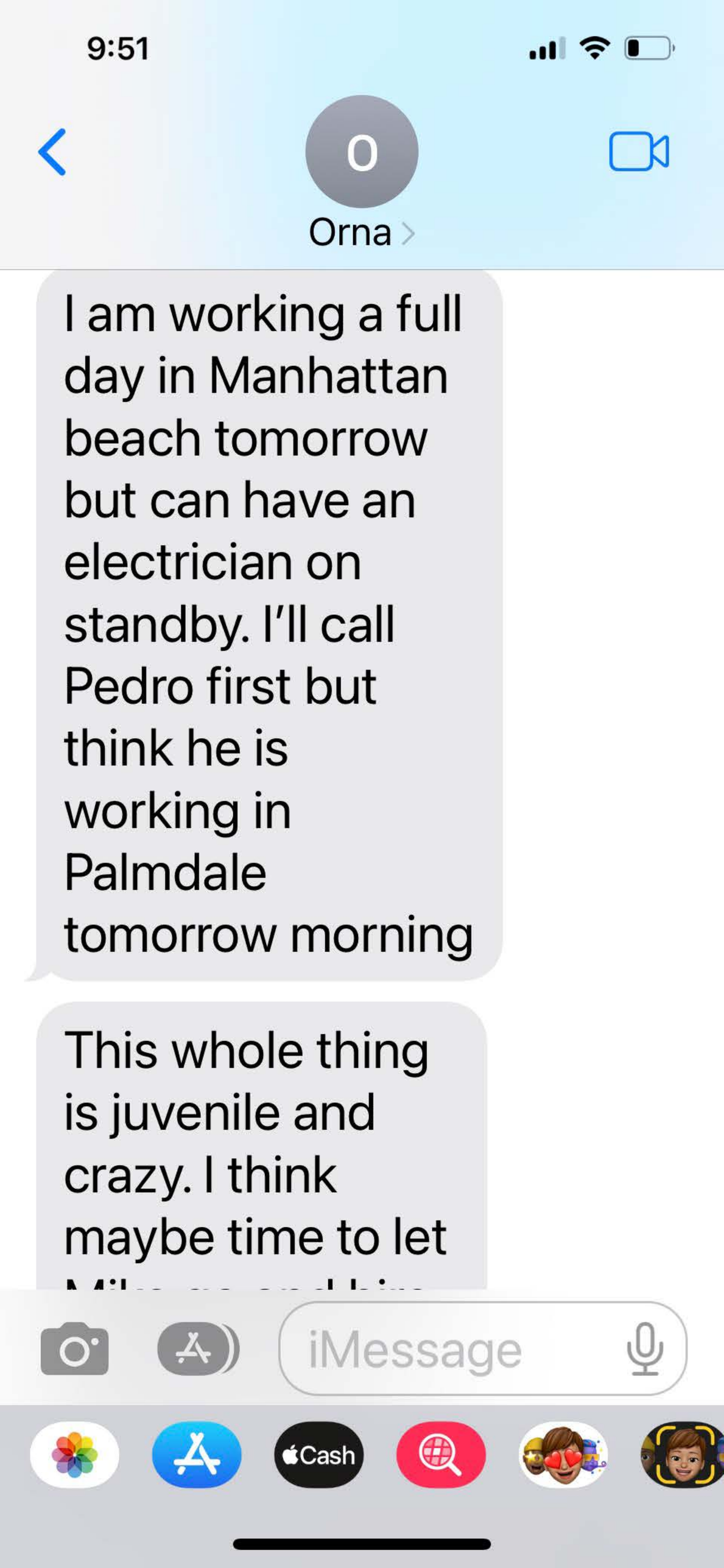

9:51
O
Orna
I am too far but go right away to cvs or wallgreens and buy a mini space heater
Not really
It’s supposed to get down to the 30s tonite and rain for the next 3 days
Sadly I know too much about the vandalism laws
iMessage
Cash


9:51
O
Orna
Sadly I know too much about the vandalism laws
Well don't touch anything their prints are on it
Cover the fuses with plastic as the rain may wash the prints off
I called him and texted him but no one is going to rewire that until
iMessage
Cash


9:51
O
Orna
I called him and texted him but no one is going to rewire that until they know what the pool guys were doing and why. Told him it would be have to be fixed by tomorrow or it is a police matter.
So I may need an electrician. I really hate him
iMessage
Cash


9:51
O
Orna
So I may need an electrician. I really hate him
Ok i will do what I can.
I would call the police if you believe it was malicious
Now he is saying that they tugged on the line because I have electrical line near
iMessage
Cash


9:51
O
Orna
Now he is saying that they tugged on the line because I have electrical line near pool
I am working a full day in Manhattan beach tomorrow but can have an electrician on standby. I'll call Pedro first but think he is working in
iMessage
Cash


9:51
O
Orna
I am working a full day in Manhattan beach tomorrow but can have an electrician on standby. I'll call Pedro first but think he is working in Palmdale tomorrow morning
This whole thing is juvenile and crazy. I think maybe time to let
iMessage
Cash

9:51

O

Orna

This whole thing is juvenile and crazy. I think maybe time to let Mike go and hire someone else

Bananas!!!



iMessage

9:51

O

Orna



He says this is not a cut wire and maybe something else happened to the panel

Well maybe the

iMessage

Cash

Well maybe the fuse blew up or shorted ???

Let me text Pedro

To ask

I just sent you Mike's cell. He says he is coming over tomorrow at 7. I will send you our text thread

The 240v power has been cut. And

9:52

O

Orna

The 240v power has been cut. And the breakers have been removed. Also the inside metal pins are bent.
Now the way that power is safely and professionally cut is by using a lockout tagout without having to cut anything.

The above is from

iMessage

Cash

Now the way that power is safely and professionally cut is by using a lockout tagout without having to cut anything.

The above is from Pedro

If the underground electrical is unsafe for digging then the cables in breaker box can

If the underground electrical is unsafe for digging then the cables in breaker box can be disconnected and capped without having to remove or cut anything

And the above as well from Pedro

I forwarded him the pictures you

I forwarded him the pictures you texted me

Thank you

Actually Pedro just that the bond now is 25k

Perfect



If a license has more than one RME or RMO qualifying the license, each qualifier must comply with the qualifier bonding requirements.

Requirements for the Bond of Qualifying Individual:

- The bond must be written by a surety company licensed through the California Department of Insurance.
- The bond must be in the amount of $25,000

**If a license has more than one RME or RMO qualifying the license, each qualifier must comply with the qualifier bonding requirements.**

## Requirements for the Bond of Qualifying Individual:

- The bond must be written by a surety company licensed through the California Department of Insurance.
- The bond must be in the amount of $25,000
- The business name, license number, and qualifier's name on the bond must correspond exactly with the information on the CSLB's records.
- The bond must have the signature of the attorney-in-fact for the surety company.
- The bond must be written on a form approved by the Attorney General's Office.

**If a license has more than one RME or RMO qualifying the license, each qualifier must comply with the qualifier bonding requirements.**

## Requirements for the Bond of Qualifying Individual:

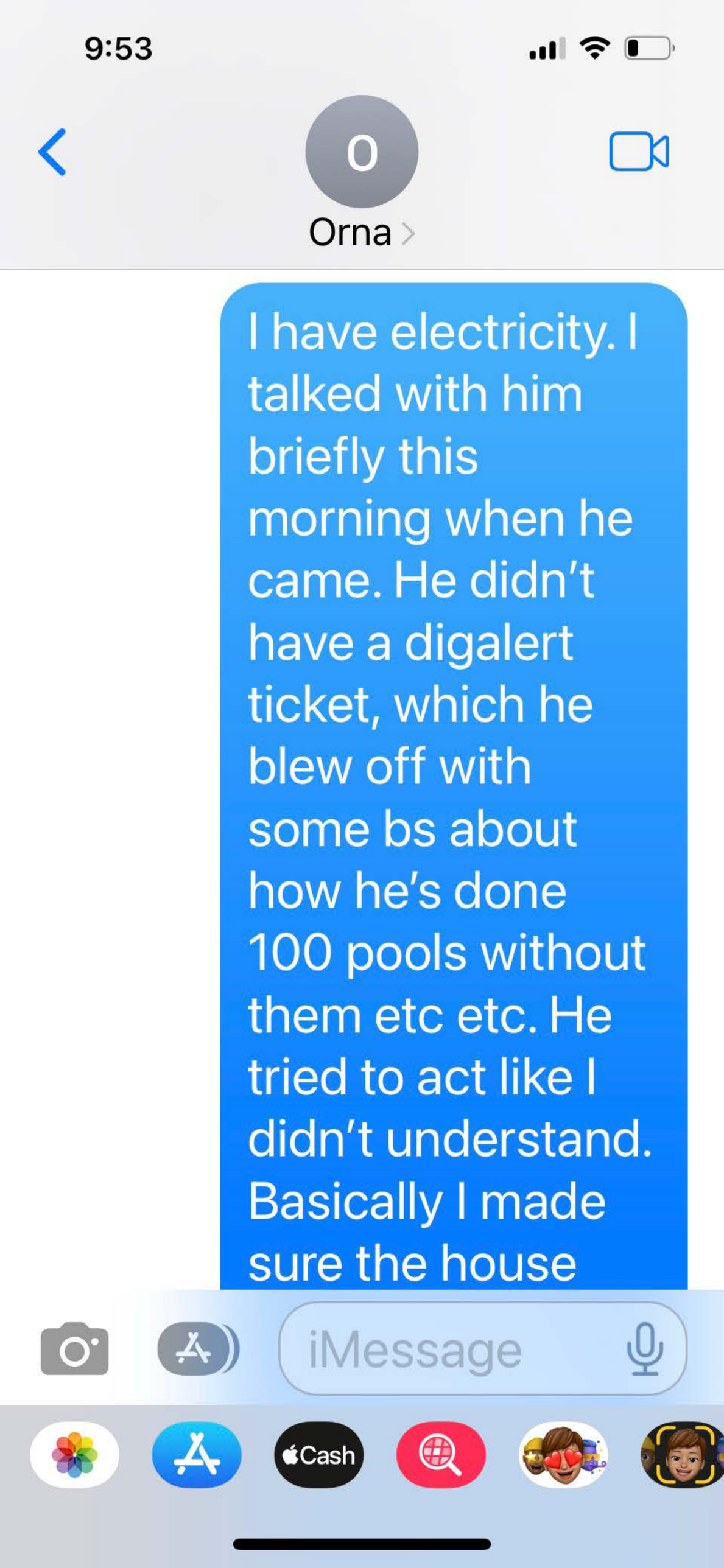
- The bond must be written by a surety company licensed through the California Department of Insurance.
- The bond must be in the amount of $25,000
- The business name, license number, and qualifier's name on the bond must correspond exactly with the information on the CSLB's records.

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- The business name, license number, and qualifier's name on the bond must correspond exactly with the information on the CSLB's records.
- The bond must have the signature of the attorney-in-fact for the surety company.
- The bond must be written on a form approved by the Attorney General's Office.

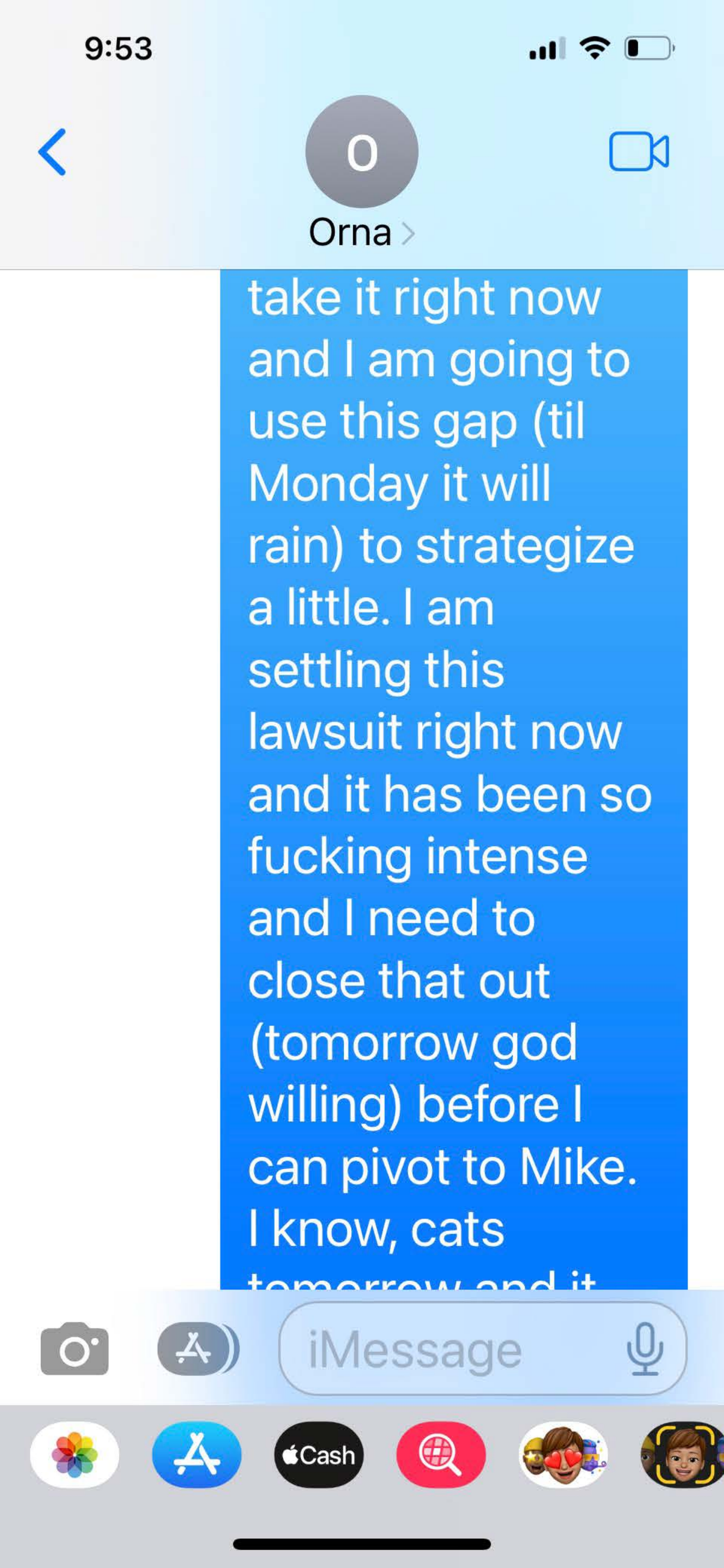
Thu, Feb 23 at 7:49 PM

How did it go this morning? Do u have electricity?

I have electricity. I talked with him briefly this morning when he came. He didn't have a digalert

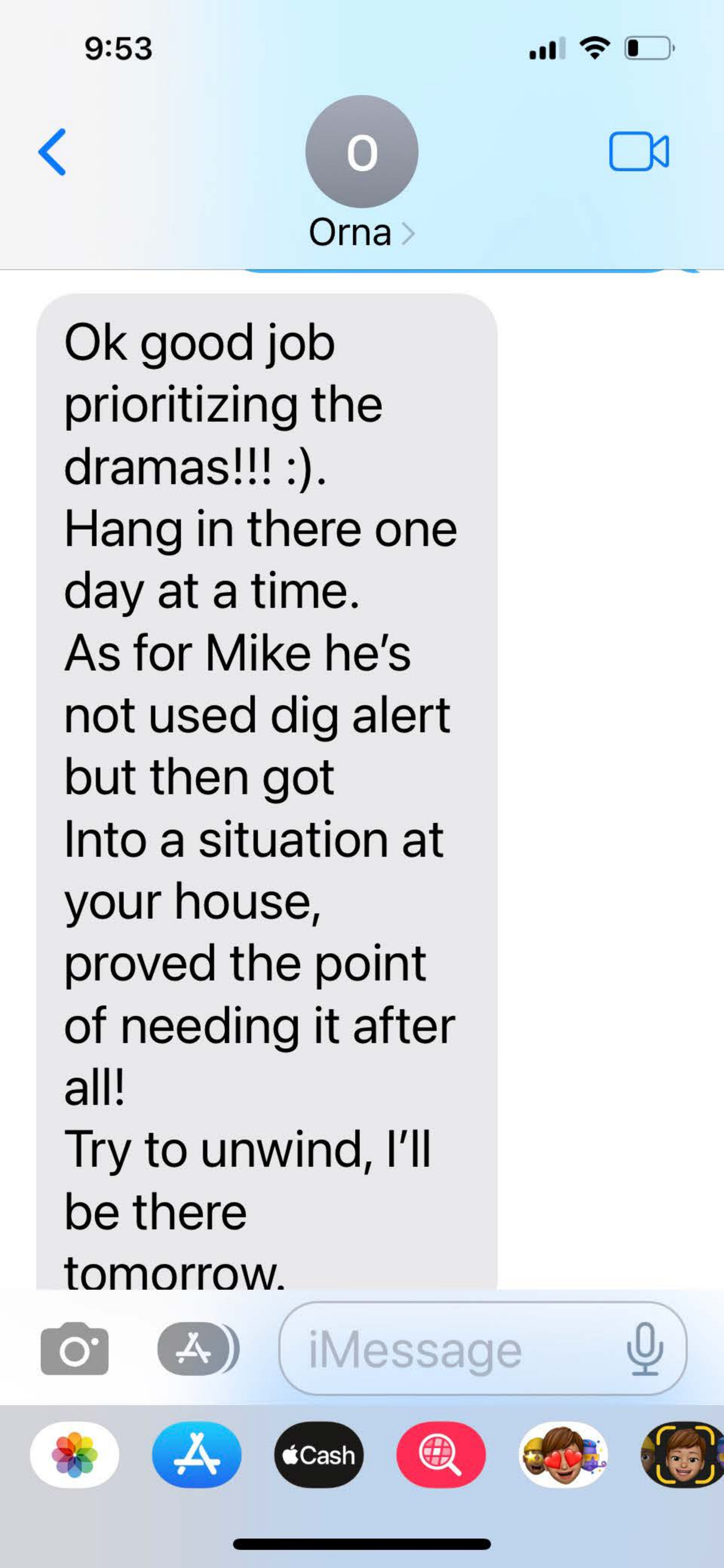

9:53
O
Orna
I have electricity. I talked with him briefly this morning when he came. He didn't have a digalert ticket, which he blew off with some bs about how he's done 100 pools without them etc etc. He tried to act like I didn't understand. Basically I made sure the house
iMessage
Cash

how he's done 100 pools without them etc etc. He tried to act like I didn't understand. Basically I made sure the house has power and that things were secured. I haven't decided how to take it right now and I am going to use this gap (til Monday it will rain) to strategize


9:53
O
Orna
take it right now and I am going to use this gap (til Monday it will rain) to strategize a little. I am settling this lawsuit right now and it has been so fucking intense and I need to close that out (tomorrow god willing) before I can pivot to Mike. I know, cats
iMessage
Cash

close that out (tomorrow god willing) before I can pivot to Mike. I know, cats tomorrow and it never stops

Ok good job prioritizing the dramas!!! :). Hang in there one day at a time. As for Mike he's not used dig alert but then got

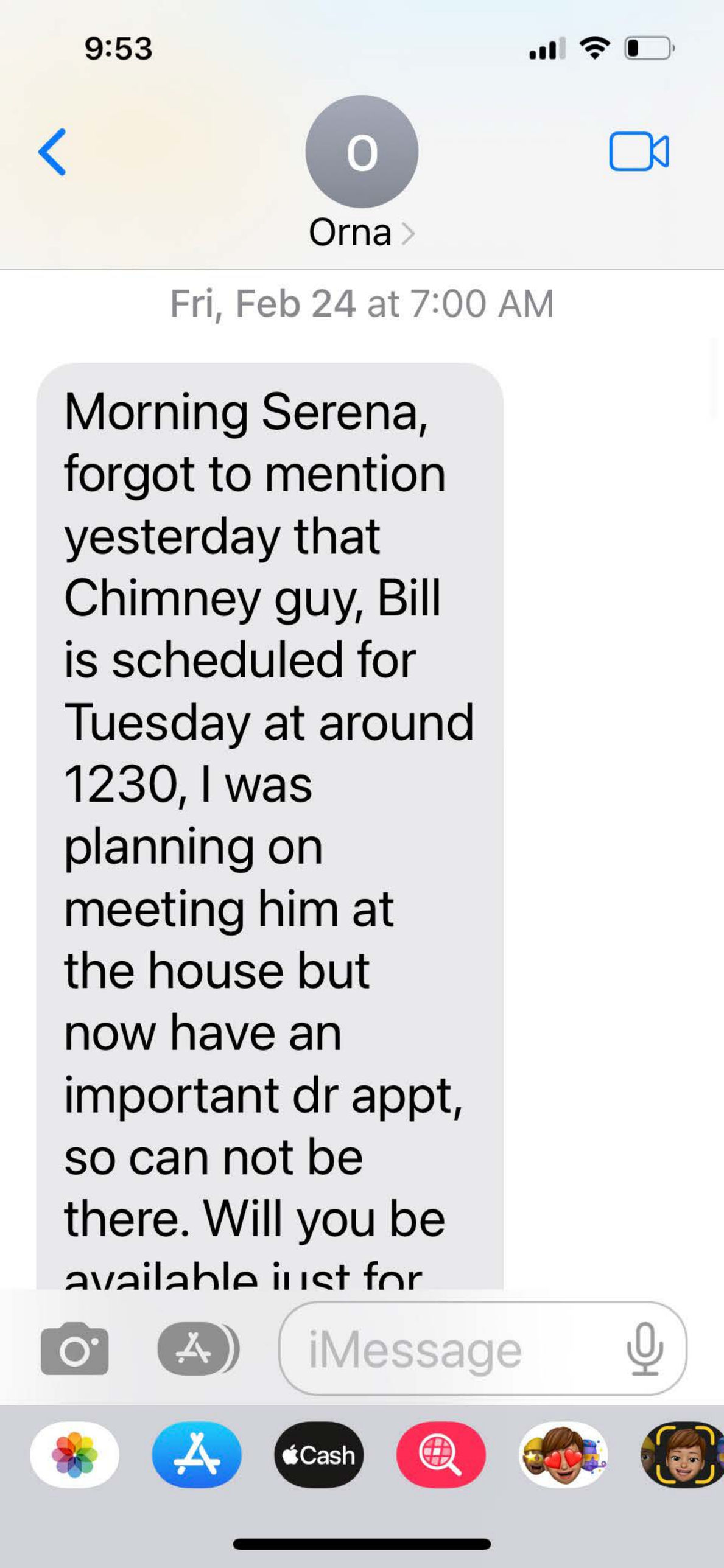

9:53
O
Orna
Ok good job prioritizing the dramas!!! :).
Hang in there one day at a time.
As for Mike he's not used dig alert but then got
Into a situation at your house, proved the point of needing it after all!
Try to unwind, I'll be there tomorrow.
iMessage
Cash

your house, proved the point of needing it after all!
Try to unwind, I'll be there tomorrow.

Thank you... 🤞 . I will see you tomorrow....buenas noches

😴 😴

Fri, Feb 24 at 7:00 AM


9:53
O
Orna
Fri, Feb 24 at 7:00 AM
Morning Serena, forgot to mention yesterday that Chimney guy, Bill is scheduled for Tuesday at around 1230, I was planning on meeting him at the house but now have an important dr appt, so can not be there. Will you be available just for
iMessage
Cash

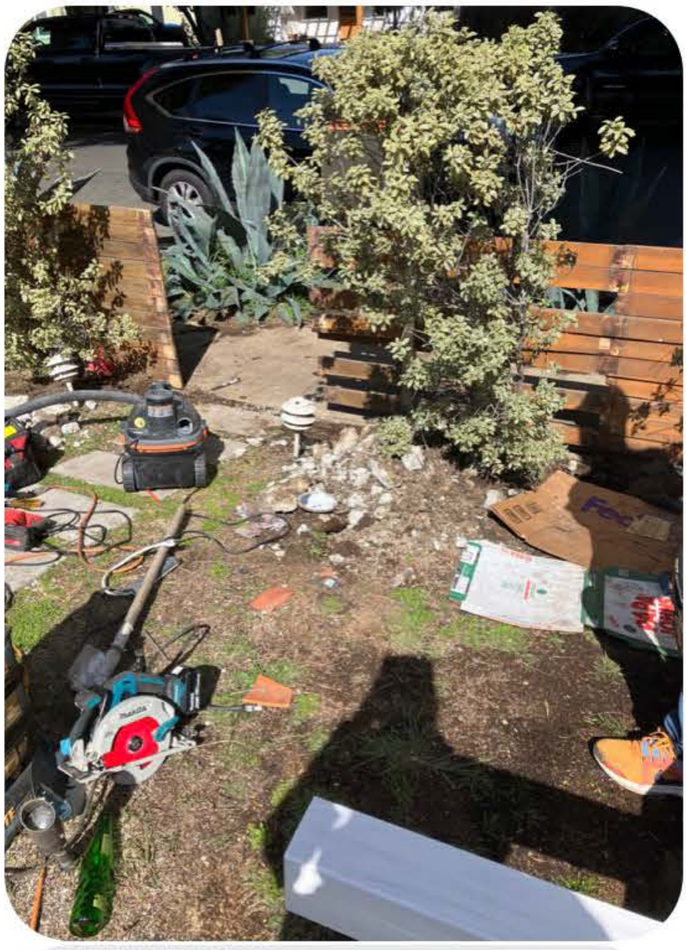
9:55

O

Orna

Wed, Mar 8 at 1:45 PM

Mike is here



Plumbers are changing posts

iMessage

**From:** Serena Puga
**To:** McClenahan, Jeff@EnergySafety
**Subject:** Link to photos and videos of excavation, with metadata. To view date/time stamp, right click the photo and click "get info" and it will give date and time information. Let me know if you can't access. I think this is metadata instructions for a mac, bu...
**Date:** Tuesday, September 26, 2023 3:47:12 PM

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https://share.icloud.com/photos/02auQuCgLDP0OUEjWmLhpiGkg

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**Appointments canceled less than 48 business hours in advance will be billed at full fee.**

Sent via Superhuman iOS


E20


















Bobcat


Bobcat




Bobcat
E20


E20


E20

DANGER
Hazardous Voltage.
Will cause death, serious
injury or substantial
property damage.
Turn off power supplying this
equipment before working inside.

PELIGRO
Voltaje peligroso.
Puede causar muerte, lesiones
substanciales o daños
materiales substanciales.
Desconecte la energía que
alimenta este equipo antes de
trabajar en el interior.

15
30
30
off/O


DANGER
Hazardous Voltage.
Will Cause death, serious
injury or substantial
property damage.
Turn off power supplying this
equipment before working inside.
PELIGRO
Voltaje peligroso. Causará
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Bobcat
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Bobcat



