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12  
13 **UNITED STATES DISTRICT COURT**  
14  
15 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 JANET GARCIA, et at.,  
17  
18 Plaintiff(s),  
19  
20 vs.  
21  
22 CITY OF LOS ANGELES, et al.,  
23  
24 Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

Assigned to Judge Dale S. Fischer

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
PRELIMINARY INJUNCTION;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
THEREOF**

[Declarations, Request for Judicial  
Notice, and Proposed Order Filed  
concurrently]

**Date: March 30, 2020**  
**Time: 1:30 p.m.**  
**Ctrm: 7D**

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**TO ALL DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on March 30, 2020 at 1:30 p.m., or as soon thereafter as the matter may be heard in Courtroom 7D of the above-titled Court, located at 350 West 1<sup>st</sup> Street, Los Angeles, California, 90012, Plaintiffs Pete Diocson Jr., Marquis Ashley, and Ktown for All will and hereby do, pursuant to Federal Rule of Civil Procedure (F.R.C.P.) 65(a), move for an order enjoining the City of Los Angeles from enforcing Los Angeles Municipal Code Section 56.11(3)(i) and 56.11(10)(d).

Plaintiffs' Motion is brought pursuant to F.R.C.P. 65(a), on the ground that Plaintiffs are likely to succeed on their claims that the sections of the Los Angeles Municipal Code are facially unconstitutional; that if the City is not enjoined from enforcing the provisions of the ordinance during the pendency of this litigation, they will continue to be irreparably harmed; and that such an injunction is equitable and in the public interest. Plaintiffs further request the City be enjoined from posting signs or otherwise notifying the public that items may be seized and immediately destroyed if they are "bulky."

Plaintiffs' Motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declarations in Support of the Preliminary Injunction, the Request for Judicial Notice, upon all the pleadings and papers on file in this action, and upon all oral and documentary evidence that may be presented at the time of the hearing on this Motion.

Dated: February 26, 2020

LEGAL AID FOUNDATION OF LOS ANGELES  
SCHONBRUN SEPLOW HARRIS AND  
HOFFMAN LLP  
KIRKLAND & ELLIS LLP

/s/ Shayla Myers

By: Shayla Myers

*Attorneys for Plaintiffs*

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## MEMORANDUM OF POINTS AND AUTHORITIES

### **I. INTRODUCTION**

“There now can be no dispute that all persons have a protected property interest in personal property stored in public areas.” Order Granting in Part and Denying in Part Defendant’s Motion to Dismiss for Failure to State a Claim (Order on Motion to Dismiss), Dkt. 36 at 12. Despite this Court’s clear recitation of the law, which is derived from yet another clear edict issued to the City of Los Angeles (the “City”) by Ninth Circuit Court of Appeals, *see Lavan v. City of Los Angeles*, 693 F.3d 1022, 1031-32 (9th Cir. 2012), the City continues to ignore the protections that the United States and California Constitutions afford to all people, including people who are homeless and whose property is necessarily stored in public areas. Los Angeles Municipal Code (LAMC) Section 56.11(3)(d), the “Bulky Item Provision,” purports to allow the City to seize and immediately destroy homeless residents’ belongings, based solely on the size of the item. On its face, the provision is unconstitutional—it is anathema to the protections afforded by the Fourth and Fourteenth Amendments to United States Constitution and Article I, Sections 8 and 13 of the California Constitution. And yet, the ordinance, by design, targets and is enforced against an incredibly vulnerable population: homeless people who have no options but to live in tents and makeshift encampments throughout Los Angeles, and who often rely on these “bulky items” to survive on the street.

In fact, since last month, the has City dramatically increased enforcement of this specific provision. On January 21, 2020, even while this Court was considering the motion by the City to dismiss Plaintiffs’ facial challenge to the Bulky Item Provision, *see* Dkt. 22—a motion that would effectively rule on the facial validity of the

ordinance—LA Sanitation<sup>1</sup> informed the Los Angeles City Council that it had changed its protocols related to enforcement of LAMC 56.11. Beginning that day, city teams tasked with cleaning up homeless encampments were instructed to “fully enforce” the Bulky Item Provision by seizing and discarding all property consistent with ordinance. *See* Plaintiff’s Request for Judicial Notice (P’s RJN), Exh. 4, at 2. Even now, after the Court’s February 15, 2020 ruling on the motions to dismiss, the City continues to use the Bulky Item Provision to seize and immediately destroy the belongings of homeless people in Los Angeles.

Plaintiffs therefore have no choice but to seek a preliminary injunction, enjoining the enforcement of LAMC 56.11(3)(d) and 56.11(10)(d).<sup>2</sup> Without further court intervention, the City will continue to violate the constitutional rights of homeless people, all under the guise of enforcing a facially unconstitutional ordinance. Plaintiffs easily satisfy the standard for a preliminary injunction. Plaintiffs have sufficiently demonstrated a likelihood of success on the merits of their facial constitutional claims. Plaintiffs will be irreparably harmed by the continued enforcement of the ordinance. And given the constitutional issues at stake, the balance of the equities and public interest are best served by a preliminary injunction preventing the City from enforcing an unconstitutional ordinance against an incredibly vulnerable population.

---

<sup>1</sup> LA Sanitation is the Designated Administrative Agency tasked with “promulgat[ing] rules, protocols, and procedures for the implementation and enforcement of” LAMC 56.11. *See* LAMC 56.11(11).

<sup>2</sup> Plaintiffs may also seek further court intervention regarding the enforcement of other provisions of LAMC 56.11 and the seizure and destruction of peoples’ belonging; however, Plaintiffs need further discovery to do so. Plaintiffs have requested the City commence discovery pursuant to Rule 26, but the City has, to date, refused to begin discovery. *See* Joint Statement Regarding Plaintiffs’ Motion for Expedited Discovery, Dkt. 29.

## II. STATEMENT OF FACTS

LAMC 56.11 outlines circumstances in which the City can seize and in many instances, immediately destroy unhoused residents' belongings. Section 56.11(3)(i), the "Bulky Item Provision," allows the City to seize and immediately destroy homeless people's belongings, based solely on the size of the item. Under the Bulky Item Provision, the City can seize and destroy any item that is "bulky,"<sup>3</sup> or roughly, what will not fit in a 60 gallon container with the lid closed. *See* LAMC 56.11(3)(d).<sup>4</sup> These seizures need not be conducted pursuant to a warrant or an exception to the warrant requirement. Nor must the City need to provide any notice or any opportunity to be heard, either before or even after the seizures. And, anyone who questions the City's

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<sup>3</sup> LAMC 56.11(2)(c) defines a Bulky Item as:

[A]ny item, with the exception of a constructed Tent, operational bicycle or operational walker, crutch or wheelchair, that is too large to fit into a 60-gallon container with the lid closed, including, but not limited to, a shed, structure, mattress, couch, chair, other furniture or appliance. A container with a volume of no more than 60 gallons used by an individual to hold his or her Personal Property shall not in itself be considered a Bulky Item.

<sup>4</sup> LAMC 56.11(3)(i) states:

(i) No Person shall Store any Bulky Item in a Public Area. Without prior notice, the City may remove and may discard any Bulky Item, whether Attended or Unattended, Stored in a Public Area unless the Bulky Item is designed to be used as a shelter. For any Bulky Item that is designed to be used as a shelter but does not constitute a Tent as defined in Subsection 2.(q), with pre-removal notice as specified in Subsection 4.(a), the City may remove and discard the Bulky Item, whether Attended or Unattended. If the Bulky Item violates Subsection 3.(d)-(h) herein, even if it is designed to be used as a shelter, without prior notice, the City may remove and discard the Bulky Item, whether Attended or Unattended.

1 actions can be arrested and faces six months in jail and/or a \$1000.00 fine. LAMC  
2 56.11(10)(d).<sup>5</sup>

3 The current version of LAMC 56.11 was adopted in 2016, following the issuance  
4 of a preliminary injunction against the City of Los Angeles in *Lavan v. City of Los*  
5 *Angeles*, 797 F.Supp.2d 1005 (C.D. Cal. 2011), and a ruling by the Ninth Circuit,  
6 upholding the injunction. *See Lavan*, 693 F.3d at 1031-32. The new version of  
7 LAMC 56.11 not only purports to allow the City to seize and destroy property in  
8 those instances allowed by the Court in *Lavan*, but also in other instances, including,  
9 relevant to this motion, when any item is too large to fit in a 60 gallon container with  
10 the lid closed. *See* LAMC 56.11(3)(d).

11 At the same time the City adopted the revision of LAMC 56.11, the City was sued  
12 yet again by a group of homeless residents whose belongings were seized and  
13 destroyed. *See Mitchell v. City of Los Angeles*, No. CV160175-SJO-GJSX, 2016 WL  
14 11519288, at \*7. And yet again, the district court judge issued an injunction,  
15 preventing the City from doing so, except where it was consistent with the Fourth and  
16 Fourteenth Amendment. *Id.*, 2016 WL 11519288, at \*7. (C.D. Cal. Apr. 13, 2016).  
17 In 2017, the City sought to modify the injunction to allow the City to enforce the  
18 Bulky Item Provision in Skid Row, but the Court refused. *Id.*, 2017 WL 10545079,  
19 at \*\*3-4 (C.D. Cal. Sept. 25, 2017) (denying the request for modification on the  
20 ground that the injunction “already appropriately addressed” the City’s concerns  
21 regarding health and safety and passable sidewalks without the need to modify the  
22 injunction to include the bulky item provision).

23  
24 <sup>5</sup> LAMC 56.11(10)(d) states: “No Person shall willfully resist, delay or obstruct a City  
25 employee from removing or discarding a Bulky Item Stored in violation of  
26 Subsection 3.(i), including by refusing to vacate or retreat from within the Bulky Item  
27 or from an obscured area created by the Bulky Item.” A violation of this provision is  
28 punishable by up to six months in jail or a \$1000.00 fine or both. *See* LAMC  
Sections 56.11(10); 11(m).

1 In September 2018, in an attempt to break the cycle of litigation that had  
 2 plagued the City for decades, organizations providing services to unhoused residents  
 3 in Los Angeles, including Plaintiff Ktown for All, sent a letter to the Mayor of Los  
 4 Angeles, specifically outlining issues with the enforcement of LAMC 56.11, and  
 5 raising concerns about the constitutionality of the ordinance. Declaration of Shayla  
 6 Myers in Support of the Preliminary Injunction (Myers Decl.) ¶ 2, Exh. A. Nine  
 7 months later, the Mayor announced the launch of a new street cleaning program,  
 8 aimed at addressing many of the concerns raised by advocates over the preceding  
 9 nine months. *Id.*, ¶ 3. The City Council approved additional funding the new  
 10 programs; they did not, however, take any steps to address the concerns raised about  
 11 the constitutionality of LAMC 56.11, let alone amend the ordinance. *Id.* ¶ 4; RJN,  
 12 Exh. 5.

13 In July 2019, after the City Council went into summer recess without any  
 14 movement on LAMC 56.11, seven homeless residents, Ktown for All and AREPS,  
 15 brought this lawsuit, challenging the constitutionality of the ordinance and the City's  
 16 continued seizure and destruction of people's belongings.<sup>6</sup>

17 In October 2019, the City rolled out the new CARE program, which promised  
 18 to represent a change in the way the City conducted cleanups and to lead the cleanups  
 19 with an approach aimed at public health, rather than enforcement. *See* P's RJN, Exh.  
 20 6. However, only two months after the launch, members of the City Council held a  
 21 hearing to review the program, and at the hearing, expressed frustration about the  
 22 new CARE program. P's RJN, Exh. 5. One council member wondered if the CARE  
 23 teams were meeting the needs of the council districts and if the individual teams were  
 24 being empowered to clean up or were "being handicapped by more bureaucracy."

25 \_\_\_\_\_  
 26 <sup>6</sup> Plaintiffs did not, however, challenge many of the practices outlined in the  
 27 September 2018 letter to the Mayor, in the hopes that the launch of the CARE and  
 28 CARE+ teams would ameliorate these concerns.

1 LA Sanitation was then instructed to report back on how LA Sanitation could address  
2 Council's concerns, specifically, to increase visible cleanliness in Los Angeles. P's  
3 RJN, Exh. 4 at p.2.

4 As a result of this "feedback from the [Energy, Climate Change, and  
5 Environmental Justice Committee] and other Council offices, in particular about the  
6 need to more effectively enforce LAMC 56.11," Los Angeles Sanitation made  
7 "program adjustments citywide." P's RJN, Exh. 4 at p.2. Among those changes was  
8 the instruction to begin strict enforcement of the Bulky Item Provision city-wide.  
9 Pursuant to the new protocols, "[e]very CARE and CARE+ team will fully enforce  
10 LAMC 56.11 at every location they visit. Compliance means that . . . prohibited  
11 items, such as bulky items and biohazards, will be impounded and disposed of  
12 according to law and policy." *Id.* LA Sanitation made these adjustments beginning  
13 on January 21, 2020, even though the City was awaiting an order from this Court on  
14 its Motion to Dismiss, which would likely address the constitutionality of the Bulky  
15 Item Provision. *See* Dkt. 22, 28.

16 On February 15, 2020, this Court issued a ruling on the City's motion to  
17 dismiss, rejecting the City's challenge to Plaintiffs' claim that the Bulky Item  
18 Provision was facially unconstitutional. Following the ruling, Plaintiffs sent the  
19 counsel for the City a letter, attempting yet again to avoid further litigation and the  
20 expenditure of city resources. To that end, Plaintiffs requested counsel for the City a  
21 letter, requesting they cease enforcement of the Bulky Item Provision and stipulate to  
22 a preliminary injunction, barring the City from enforcing the Bulky Item Provision of  
23 LAMC 56.11 and the corresponding LAMC 56.11(10)(d).

24 In response, counsel for the City indicated that an email had been sent out  
25 regarding the continued enforcement of LAMC 56.11, but that they needed until  
26 Friday, February 21, 2020 to confer internally about how to respond to Plaintiffs'  
27 request. Still attempting to avoid the need for further court intervention, counsel for  
28

1 Plaintiffs agreed to again hold off filing a motion for a preliminary injunction until  
 2 the City had a chance to respond on Friday, February 21, 2020. Counsel indicated,  
 3 however, that they were doing so with the expectation that the City was not enforcing  
 4 the Bulky Item Provision, and if they learned otherwise, they would need to seek  
 5 court intervention to protect their clients' rights. The City did not substantively  
 6 respond to Plaintiffs' request on Friday, instead requesting that Plaintiffs "be  
 7 patient."

8 Contrary to this expectation, the City continues to enforce the Bulky Item  
 9 Provision against homeless residents. On February 24, 2020, Plaintiff Ktown for  
 10 All's co-founder and two of its members were on their way to a meeting with United  
 11 Way and other homeless services provider to discuss the City's A Bridge Home  
 12 shelter program (which is why the organization was founded). Declaration of  
 13 Phuong Nguyen in Support of Plaintiffs' Preliminary Injunction ("Nguyen Decl."), ¶¶  
 14 3, 8-9. Shortly before the meeting, they were alerted that a clean-up was occurring in  
 15 their neighborhood. *Id.* They learned that Sanitation workers were insisting on taking  
 16 bulky items from an unhoused neighbor that they had been working with since the  
 17 group's founding. The neighbor is in a wheelchair and often needs assistance during  
 18 sweeps to advocate against his belongings being thrown away, and he needs help to  
 19 move his belongings when there are cleanups. Nguyen Decl. ¶ 8; Declaration of  
 20 Nicholas Price in Support of Plaintiffs' Preliminary Injunction ("Price Decl."), ¶¶ 3-5.  
 21 As a result, Ktown for All was forced to postpone their meeting and instead, go to the  
 22 encampment cleanup to advocate for their neighbor and monitor the sweep. Nguyen  
 23 Decl., ¶ 8-9.

24 At the encampment, despite Ktown for All's attempts to advocate for their  
 25 neighbor, LAPD officers and Sanitation workers informed Ktown for All members  
 26 and the owner of the property that the "bulky item" provision was the law. LA  
 27 Sanitation identified three pallets Kahn used to keep himself off the muddy, wet  
 28

1 grass, and a thin foam cushion he sleeps on as bulky items. Because they were  
 2 “bulky,” Sanitation workers summarily threw them in the back of a garbage truck.  
 3 Price Decl. ¶¶ 10-11; Declaration of Nicolas Emmons in Support of Preliminary  
 4 Injunction (“Emmons Decl.”), ¶ 4, Ex. A. This is consistent with the City’s own  
 5 documents related to homeless encampment cleanups: The City continues to identify  
 6 bulky items on daily cleanup schedules for the CARE+ teams which conduct  
 7 cleanups at homeless encampments and enforce LAMC 56.11. *See* Declaration of  
 8 Adrian Riskin in Support of Plaintiffs’ Declaration, ¶ 6, Ex. A.

9 The continued enforcement of the Bulky Item Provision impacts Plaintiffs and  
 10 other homeless residents throughout Los Angeles. Plaintiff Marquis Ashley uses a  
 11 cart to transport necessary items to his encampment, which is in an industrial area  
 12 away from resources and food. Ashley Decl. ¶ 4. He had two of the carts he used to  
 13 get around, but they were destroyed as bulky items in May 2019. confiscated and  
 14 destroyed at the intersection of Lomita and McCoy. *Id.*, ¶ 12, 14. He now has a new  
 15 cart, but as long as the City continues to enforce the Bulky Item Provision, he is at  
 16 risk of having that cart taken and summarily destroyed. *See Id.*, ¶ 17, Exh. B.  
 17 Plaintiff Pete Diocson Jr. has had two dog kennels confiscated and destroyed.  
 18 Dioscon Decl. ¶¶ 12-15. He worries about getting a new kennel, which the City  
 19 could decide is a bulky item, but without a kennel, he is worried that his dog will get  
 20 loose and run into traffic at night. *Id.*, ¶¶ 14-16. He also has another item that, like  
 21 many other similarly sized items that have been seized and destroyed as Bulky Items,  
 22 could also be seized and destroyed if the City is allowed to continue enforcing the  
 23 Bulky Item Provision. *Id.*

24 Plaintiff Ktown for All works with members and homeless neighbors whose  
 25 property could be taken and destroyed as long as the City continues to enforce the  
 26 Bulky Item Provision. *See* Nguyen Decl. ¶¶ 5-14; Bettega Decl. ¶¶ 10-13. Ktown  
 27 for All’s member, Rachelle Bettega, previously had bins seized and destroyed  
 28

1 because the City determined they were “bulky items.” Bettega Decl. ¶¶ 10-13. Ms.  
 2 Bettega needed the bins to keep her clothes and other possessions off the ground, to  
 3 prevent them from getting wet when it rains. *Id.*, ¶ 10. She now has a stackable set  
 4 of shelves, but LA Sanitation could take and destroy these as well, and she would  
 5 have no way to contest the seizure or destruction.

6 Plaintiff Ktown for All is itself affected by the continued enforcement of the  
 7 unconstitutional ordinance. The organization continues to divert resources away  
 8 from advocacy meetings and strategic planning for additional housing and shelters to  
 9 monitoring sweeps and assisting unhoused neighbors who are subjected to the  
 10 enforcement of the Bulky Item Provision. Nguyen Decl. ¶¶ 6-7. After items are  
 11 seized, Ktown for All organizers spend resources posting on social media for items  
 12 that need to be replaced, having the items delivered to their residences, and then  
 13 delivering the items. *Id.* ¶ 11. Those are resources Ktown for All could put towards  
 14 advocacy or other forms of outreach, that instead go to replacing items the City has  
 15 taken and destroyed pursuant to the Bulky Item Provision. *Id.* ¶¶ 6-7, 11-12.

### 16 **III. PLAINTIFFS ARE ENTITLED TO INJUNCTIVE RELIEF**

17 To obtain a preliminary injunction, a “[p]laintiff must show that ‘he is likely to  
 18 succeed on the merits, that he is likely to suffer irreparable harm in the absence of  
 19 preliminary relief, that the balance of equities tips in his favor, and that an injunction  
 20 is in the public interest.’” *League of Wilderness Defenders/Blue Mountains*  
 21 *Biodiversity Project v. Connaughton*, 752 F.3d 755, 759 (9th Cir. 2014) (citing  
 22 *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008)). All the  
 23 *Winter* factors weigh in favor of an injunction here.<sup>7</sup>

24  
 25 <sup>7</sup> The Court may also grant a preliminary injunction if Plaintiffs can show “serious  
 26 questions going to the merits[,]” that the “balance of hardships tips sharply in [their]  
 27 favor, and the other two *Winter* factors are satisfied.” *Shell Offshore, Inc. v.*  
 28 *Greenpeace, Inc.*, 709 F.3d 1281, 1291 (9th Cir. 2013) (internal quotation marks

**a. Plaintiffs Are Likely To Succeed On Their Claim That The “Bulky Item Provision” Of LAMC 56.11 Is Facially Unconstitutional**

First, Plaintiffs easily meet their burden of showing they are likely to succeed on the merits of their challenge to the Bulky Item Provision. To show a likelihood of success on the merits, the moving party need not demonstrate that they will prevail, but only that it is “more likely than not” that they will. *Univ. of Tex. v. Camenisch*, 451 U.S. 390, 395 (1981); *Leiva–Perez v. Holder*, 640 F.3d 962, 966 (9th Cir. 2011). As this Court already ruled in its order denying the City’s motion to dismiss Plaintiffs’ facial challenge of the Bulky Item Provision, the provision on its face is both unreasonable and fails to provide “any procedural safeguards whatever . . . .” *See e.g.*, Order on Motion to Dismiss, Dkt. 36 at 11, 12, 15. *See also Billups v. City of Charleston*, 194 F. Supp. 3d 452, 460 (D.S.C. 2016) (although different standards apply to each motion, the court’s ruling on constitutionality will be sufficient to decide a motion to dismiss and “will effectively determine the outcome of plaintiffs’ motion for preliminary injunction”). Because the Bulky Item Provision is unconstitutional on its face, Plaintiffs have demonstrated they are likely to succeed on the merits of their claims related to those provisions.

**i. The Bulky Item Provision Violates the Fourth Amendment**

The Fourth Amendment “protects the right of the people to be secure in their persons, houses, papers and effects, against unreasonable seizures and searches.” U.S. Const., Amend. 4. A “seizure” under the Fourth Amendment occurs “where there is some meaningful interference with an individual’s possessory interest in that property.” *Soldal v. Cook County Ill.*, 506 U.S. 56, 63 (1992). “A seizure conducted without a warrant is *per se* unreasonable under the Fourth Amendment—subject only to a few specifically established and well delineated exceptions.” *Miranda v. City of Cornelius*, 429 F.3d 858, 862 (2005); *see also Recchia v. City of Los Angeles*, 889

omitted). Under either standard, Plaintiffs have demonstrated that a preliminary injunction is appropriate here.

1 F.3d 553, 558 (9th Cir. 2018); *United States v. Cervantes*, 703 F.3d 1135, 1141 (9th  
 2 Cir. 2012). *Cf. Texas v. Brown*, 460 S. 730, 735-36 (1983) (listing exceptions to the  
 3 warrant requirement). Moreover, “[v]iolation of a City ordinance does not vitiate the  
 4 Fourth Amendment’s protection of one’s property.” *Lavan*, 693 F.3d at 1029, *see*  
 5 *also Miranda*, 429 F.3d at 864. When an ordinance allows for the search or seizure  
 6 of property without a warrant and without a requirement that the seizure fall within a  
 7 warrant exception, the ordinance is unconstitutional on its face. *See Torres v. Puerto*  
 8 *Rico*, 442 U.S. 465, 466 (1979); *City of Los Angeles v. Patel*, 135 S.Ct. 2443, 2450  
 9 (2015) (citing *Torres*).

10 The City has conceded, as it must, that all individuals have a property interest in  
 11 their personal property, regardless of its size.” Def’s MTD at 9:19-20; *see also Lavan*,  
 12 693 F.3d at 1030. *See also* Order Granting in Part and Denying in Part Defendants’  
 13 Motion to Dismiss at 12 (“There now can be no dispute that all persons have a  
 14 protected property interest in personal property stored in public areas.”). The City has  
 15 also conceded, again as it must, that the removal and destruction of that property are  
 16 seizures within the meaning of the Fourth Amendment. *See* Def’s Motion to Dismiss,  
 17 Dkt. 22, at 7:19-23. Therefore, the only question regarding the constitutionality of the  
 18 Bulky Item Provision is whether the seizure and summary destruction of property,  
 19 solely based on the size of the item, is reasonable. As this court ruled in its Motion to  
 20 Dismiss, and under controlling Ninth Circuit and Supreme Court precedent, it is not.

21 The Bulky Item Provision places no constitutional limits on the City’s ability to  
 22 seize and immediately destroy people’s belongings that do not fit in a 60-gallon  
 23 container with the lid closed. It does not require the City to obtain a warrant, nor does  
 24 it on its face, meet any of the well-established exceptions to the warrant requirement  
 25 as required by the Fourth Amendment. *Compare, e.g.,* LAMC 56.11(h) (allowing the  
 26 City to seize and discard “evidence of a crime or contraband, *as permissible by law*”)  
 27 (emphasis added). The City cannot identify a warrant exception or constitutional  
 28

1 principle that allows it to seize and immediately destroy property solely based on its  
 2 size. *See Isaacson v. Horne*, 716 F.3d 1213, 1230 (9<sup>th</sup> Cir. 2013); *Recchia*, 889 F.3d  
 3 at 558 (“Because warrantless searches and seizures are per se unreasonable, the  
 4 government bears the burden of showing that a warrantless search or seizure falls  
 5 within an exception to the Fourth Amendment's warrant requirement”). On this basis,  
 6 the Court already determined the “the only work the Bulky Item Provision does is to  
 7 permit seizures of items of a certain size where there is no other valid reason to  
 8 remove them,” Order on Motion to Dismiss, Dkt. 36 at 10. This is insufficient under  
 9 the Fourth Amendment. Moreover, the “immediate destruction of Bulky Items is  
 10 unreasonable on its face.” Order on Motion to Dismiss, Dkt. 36 at p. 11. Therefore,  
 11 Plaintiffs have demonstrated a likelihood of success on the merits of their facial  
 12 challenge to the Bulky Item Provision under the Fourth Amendment.

13 **ii. The “Bulky Item Provision” of LAMC 56.11 Violates the**  
 14 **Fourteenth Amendment and Article I, Section 8 of the**  
 15 **California Constitution**

16 The Due Process Clause of the Fourteenth Amendment prevents the state from  
 17 “depriv[ing] any person of life, liberty, or property, without due process of law.” U.S.  
 18 Const. Amend. XIV.<sup>8</sup> Where an individual is deprived of a property interest, the

19 <sup>8</sup> As this Court noted in its order on the Motion to Dismiss, “[t]he language fo Article  
 20 I, § 7 of the California Constitution is virtually identical to the Due Process Clause, of  
 21 the United States Constitution, with the caveat that California courts place a higher  
 22 significance on the dignitary interest inherent in providing proper procedure.” Order  
 23 on Motion to Dismiss, Dkt. 36 at 12 (quoting *Nozzi v. Hous. Auth. Of City of Los*  
 24 *Angeles*, 806 F.3d 1178, 1190 n.15 (9<sup>th</sup> Cir. 2015). If the fourth factor were  
 25 necessary to consider, this factor would weigh heavily in favor of plaintiffs, who as  
 26 unhoused individuals, are stripped of due process rights that would otherwise  
 27 unquestionably be afforded to individuals whose belongings may be left in the public  
 28 right of way. *See People v. Ramirez*, 25 Cal.2d 260 267-68 (1979) (explaining that,  
 under the California constitution, there is an “important due process interest in  
 recognizing the dignity and worth of the individual by treating him as an equal, fully  
 participating and responsible member of society).

1 Supreme Court has long held that the gravity of a deprivation is irrelevant to the  
 2 question whether account must be taken of the Due Process Clause. *See Goss v.*  
 3 *Lopez*, 419 U.S. 565, 579 (1975). “[T]o put it as plainly as possible, the State may not  
 4 finally destroy a property interest without first giving the putative owner an  
 5 opportunity to present his claim of entitlement.” *Logan v. Zimmerman Brush Co.*, 455  
 6 U.S. 422, 433 (1982).

7 While the amount of process that is due depends on the specific interest,  
 8 balanced against the government interest at stake, *at a minimum*, the procedural  
 9 safeguards must include “an opportunity to be heard at a meaningful time and in a  
 10 meaningful manner.” *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976); *see also*  
 11 *Brewster v. Bd. of Edu. of Lynwood Unified Sch. Dist.*, 149 F.3d 971, 984 (9th Cir.  
 12 1998). Indeed, “it has become a truism that ‘some form of hearing’ is required before  
 13 the owner is finally deprived of a protected property interest.” *Logan*, 455 U.S. 422,  
 14 433 (emphasis in original, citing *Board of Regents of State Colleges v. Roth*, 408 U.S.  
 15 564, 570-71, n.8). The seizure of property without a pre-deprivation hearing,  
 16 moreover, has been sustained only in emergencies and “where the owner is afforded  
 17 prompt post-seizure hearing at which the person seizing the property must at least  
 18 make a showing of probable cause.” *Styppman v. City and Cnty of San Francisco*,  
 19 557 F.2d 1338, 1343 & n.3 (9th Cir. 1977) (collecting cases); *see also Lavan*, 693  
 20 F.3d at 1032-33. *Cf. North Am. Cold Storage Co., v. City of Chicago*, 211 U.S. 306,  
 21 320 (1908) (preventing the consumption of putrid chicken is sufficient an emergency  
 22 to justify foregoing pre-deprivation hearing, but noting that in post-seizure challenge,  
 23 the party that seized the property had the burden of showing that the seizure as  
 24 justified). That is simply not the case here, where items are seized and destroyed  
 25 under the Bulky Item Provision, simply because they cannot fit in a 60 gallon  
 26 container with the lid closed.

27 As this Court noted in its ruling on the City’s Motion to Dismiss, the Bulky  
 28

Item Provision “permits the City to remove and permanently destroy Bulky Items without any procedural safeguards whatever.” Order on Motion to Dismiss, Dkt. 36 at 15. Once the City decides an item is “bulky,” it is immediately seized and destroyed. Compare, e.g., LAMC 56.11(3)(a), (b) and (4)-(6) (providing both pre- and post-deprivation notice and storage requirements for belongings that are not considered “bulky”). The City has already been counseled many times, including by the Ninth Circuit, that it “may not take property like a thief in the night; rather, it must announce its intentions and give the property owner a chance to argue against the taking.’ This simple rule holds regardless of whether the property in question is an Escalade or an EDAR, a Cadillac or a car”. *Lavan*, 693 F.3d at 1032(quoting *Clement v. City of Glendale*, 518 F.3d 1090, 1093 (9th Cir. 2000)). And yet, that is exactly what the Bulky Item Provision allows. At no point is a person given any opportunity to contest the determination that the item is bulky and can be immediately destroyed. Indeed, the ordinance goes further, sanctioning arrest and imprisonment for up to six months, if a person simply refuses to give up their belongings for destruction. LAMC 56.11(10)(d). Like other cases in which the Courts have struck down ordinances on facial challenges for failing to provide any due process, see e.g., *Draper v. Coombs*, 792 F.2d 915, 923 (9th Cir. 1986); *Propert v. District of Columbia*, 948 F.2d 1327 (D.C. Cir. 1991); *Wong v. Cny and Cty. Of Honolulu*, 333 F.Supp.2d 942, 948-50 (D. Hawaii 2004); *Kash Enters., Inc. v. City of Los Angeles*, 19 Cal. 3d 294, 309 (1977), the Bulky Item Provision is facially unconstitutional because “[it] fails to provide the procedural due process required by the Fourteenth Amendment.” Order on Motion to Dismiss, Dkt. 36 at 15-16.

Against this backdrop, Plaintiffs have shown they are likely to succeed on the merits of their facial challenges to the Bulky Item Provision.

**b. Plaintiffs Have Shown Irreparable Harm Absent Preliminary Relief**

Absent the Court’s intervention to enjoin the City’s enforcement of the unconstitutional Bulky Item Provision, Plaintiffs Ktown for All and the individual plaintiffs will suffer irreparable harm. “It is well established that the deprivation of constitutional rights ‘unquestionably constitutes irreparable injury.’ *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)); *see also Valle del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir. 2013).

The homeless Plaintiffs in this case are frequently subjected to City sweeps, and every time they are subjected to a sweep, they are at risk of having their constitutional rights violated by the enforcement of the Bulky Item Provision. This is particularly true, given the City’s January 21, 2020 changes in the enforcement of LAMC 56.11. LA Sanitation was explicit that CARE and CARE+ teams would now “fully enforcing LAMC 56.11 at every location they visit” and that this means that “prohibited items such as bulky items . . . will be impounded and disposed of according to law and policy.” P’s RJN, Exh. 4 at p. 2. Given that the Bulky Item Provision is facially unconstitutional under both the Fourth and Fourteenth Amendments to the United States Constitution, Plaintiffs face an imminent threat that the continued enforcement of the ordinance will violate their constitutional rights. That is enough to meet Plaintiffs’ burden under the second prong of *Winters*.

In addition, however, the irreparable harm caused by the violation of Plaintiffs’ constitutional rights is compounded by the fact that the constitutional violations results in the actual and permanent deprivation of their belongings. As evidenced by the attached declarations, after Plaintiff Pete Diocson had his dog kennel taken and destroyed by LA Sanitation in April 2019, he was able to get another kennel. Dioscon Decl., ¶¶ 8, 12-14. But the City also subsequently seized and destroyed that new dog kennel. *Id.*, ¶ 15. He wants to get another kennel, but he worries that any kennel he

1 gets will be declared a Bulky Item and immediately taken and destroyed. He has had  
 2 other bulky items taken as well, and he is at risk that items he has now will be seized  
 3 and immediately destroyed.

4 Plaintiff Marquis Ashley stays in a remote industrial area and has little access  
 5 to resources like water and food. He relies on his bicycle to get around and uses a  
 6 cart to help him transport things he needs to survive. After his carts were seized and  
 7 destroyed as Bulky Items in May 2019, he built another cart. Ashley Decl., ¶ 17,  
 8 Exh. B. But if the City is allowed to continue to enforce the Bulky Item Provision,  
 9 he runs the risk of having his new cart seized and immediately destroyed, just as his  
 10 last carts were summarily destroyed.

11 Mr. Diocson and Mr. Ashley had no way to contest prior decisions by LA  
 12 Sanitation to seize and destroy their belongings. If the City continues to enforce the  
 13 Bulky Item Provision and chooses to take their belongings as “bulky,” they will still  
 14 have no way to challenge LA Sanitation’s decisions in the future.<sup>9</sup> Given the  
 15 frequency of sweeps and the City’s current enforcement posture, Plaintiffs are  
 16 unquestionably “likely to suffer irreparable harm before a decision on the merits can  
 17 be rendered.” Therefore, “the threat of irreparable harm is sufficiently immediate to  
 18 warrant preliminary injunctive relief.” *Boardman v. Pac. Seafood Grp.*, 822 F.3d  
 19 1011, 1023 (9th Cir. 2016) (*quoting Winter*, 555 U.S. at 22).

20 Ktown for All also suffers irreparable injury as a result of the City’s ongoing  
 21 enforcement of the Bulky Item Provision. As the District Court in Northern

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22 <sup>9</sup> Even attempting to question the seizure or destruction of their property on the  
 23 street places them at risk of arrest and prosecution, which itself constitutes  
 24 irreparable harm. *See Valle del Sol Inc.* 732 F.3d at 1029) (plaintiff demonstrated  
 25 irreparable harm upon a showing that he faced a credible threat of prosecution under  
 26 the statute); *Georgia Latino Alliance for Human Rights v. Governor of Georgia*, 691  
 27 F.3d 1250, 1269 (11th Cir. 2012) (finding irreparable harm where “[p]laintiffs are  
 28 under the threat of state prosecution for crimes that conflict with federal law).

1 California recently noted, “[t]he Ninth Circuit has recognized that an organizational  
 2 plaintiff’s suffering “ongoing harms to [its] organizational missions” can constitute  
 3 irreparable harm . . . .” *S.A. v. Trump*, 2019 WL 990680, at \*9 (N.D.Cal., 2019)  
 4 (citing *Valle del Sol Inc.* 732 F.3d at 1029).

5 Here, unhoused residents in Koreatown, who rely on Ktown for All’s outreach,  
 6 find themselves subjected to sweeps and the continued unconstitutional seizure and  
 7 destruction of property that the City deems “bulky.” Nguyen Decl. ¶¶ 5-14; Bettega  
 8 Decl. ¶¶ 10-13. This puts strain on Ktown for All, which struggles to keep in touch  
 9 with their neighbors and frustrates their mission of creating connections between  
 10 housed and unhoused neighbors. When unhoused neighbors move after sweeps, it is  
 11 be difficult to reconnect with them and this makes it difficult for Ktown for All to let  
 12 their homeless neighbors and members know about Ktown for All’s meetings.  
 13 Nguyen Decl. ¶ 5. *Id.* Engaging unhoused neighbors in advocacy is an integral part  
 14 of Ktown for All’s mission, but sometimes it is months before the organization can  
 15 reconnect with homeless residents after a sweep, and this disrupts their engagement.  
 16 *Id.*, ¶¶ 4, 5.

17 Moreover, the destruction of people’s belongings, and in particular, bulky  
 18 items, has resulted in Ktown for All having to replace more items for their neighbors  
 19 than they would otherwise have to replace. In addition to sometimes replacing items  
 20 that are seized and immediately destroyed, like the foam cushion taken by LA  
 21 Sanitation on February 24, 2020, other items the City seizes as “bulky” are often the  
 22 very items homeless residents use to keep their belongings dry and clean. Nguyen  
 23 Decl. ¶¶ 11-13; Bettega Decl. ¶¶ 9-12; Dioscon Decl. ¶ 17. When these purportedly  
 24 “bulky items” are taken, homeless residents’ belongings get wet, and then those items  
 25 are in turn thrown away by the City. This vicious cycle strains Ktown for All’s  
 26 resources, since it then has to provide more items to replace the items the City has  
 27 taken from their unhoused neighbors.

1 In addition, because the City provides no process whatsoever in connection  
 2 with the seizure and destruction of bulky items, Ktown for All has had to divert  
 3 resources away from advocating for housing and towards being present at the  
 4 numerous sweeps that happen every week. Homeless residents are at risk of arrest if  
 5 they complain about items being taken and destroyed because LA Sanitation has  
 6 determined is “bulky.” *See e.g.*, LAMC 56.11(10)(d); Dioscon Decl. ¶ 12. To  
 7 address this issue, Ktown for All members go to sweeps as often as possible to  
 8 monitor and document the sweeps and to advocate that their neighbors and homeless  
 9 members be allowed to keep the “bulky items” they need to survive. Nguyen Decl.  
 10 ¶¶ 5-7. This is time-consuming, and it prevents Ktown for All from engaging in  
 11 other forms of advocacy.<sup>10</sup> But if they did not do this, it would be harder to connect  
 12 with their neighbors, and they would have to replace even more items than they  
 13 already have to replace as a result of the sweeps.

14 This diversion of resources and the frustration of its mission as a result of the  
 15 enforcement of the Bulky Item Provision is sufficient to show irreparable harm. *See*  
 16 *Valle del Sol Inc.* 732 F.3d at 1029. *See also East Bay Sanctuary Covenant v. Trump*,  
 17 354 F.Supp.3d 1094, 1115–16 (N.D.Cal., 2018); *S.A. v. Trump*, 2019 WL 990680, at  
 18 \*9 (N.D.Cal., 2019).

19 Homeless residents rely on items the City characterizes as bulky to simply get  
 20 through the day. Bottega Decl. ¶¶ 2-9 (explaining that bicycle that was thrown out  
 21 helped her get to work); Ashley Decl. ¶¶ 5-7, 17 (explaining that carts are necessary  
 22 for transporting supplies); Dioscon Decl., ¶¶ 18 (explaining that kennel gives him

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23 <sup>10</sup> For example, as discussed *supra* p. 7, on February 24, 2020, Ktown for All  
 24 members had to postpone a meeting about the Bridge Home Shelter in Koreatown to  
 25 help a longtime homeless neighbor who was being subjected to a sweep and  
 26 enforcement of the Bulky Item Provision. When Ktown for All members were  
 27 unsuccessful at saving his foam cushion, they then will have to expend more resources  
 28 to find blankets and other resources to replace the items that were thrown away.

1 peace of mind that his dog will not run away). Every day the City is allowed to  
 2 continue to enforce the Bulky Item Provision, it violates the constitutional rights of  
 3 Plaintiffs and the thousands of other individuals who are subjected to the enforcement  
 4 of the ordinance. The ongoing violation of their rights, compounded by the  
 5 permanent destruction of their belongings, and the frustration of Ktown for All's  
 6 mission and diversion of resources, is more than sufficient to demonstrate that  
 7 Plaintiffs will face irreparable harm unless the City is enjoined from enforcing the  
 8 unconstitutional Bulky Item Provision.

9 **c. The Balance of Equities and Public Interest Weigh Heavily in**  
 10 **Plaintiffs' Favor**

11 The third and fourth factors concern the equitable interests at stake in granting  
 12 an injunction. The third factor is whether the equities favor an injunction. The fourth  
 13 factor considers the impact on the public interest. *Winter*, 555 U.S. at 20. This factor  
 14 primarily considers the injunction's impact on non-parties. *League of Wilderness*  
 15 *Defenders*, 752 F.3d at 766. This includes, for example, non-parties whose rights  
 16 would otherwise be subjected to an unconstitutional statute. *See Klein v. City of San*  
 17 *Clemente*, 584 F.3d 1196, 1208 (9<sup>th</sup> Cir. 2009). Where the government is a party to  
 18 the litigation and opposes an injunction, the third and fourth *Winter* factors merge.  
 19 *See Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9<sup>th</sup> Cir. 2014). And  
 20 where, as here, Plaintiffs have shown a strong likelihood of success on the merits and  
 21 irreparable harm, "the balance of equities and public interest tip in favor of  
 22 Plaintiffs." *Los Padres Forestwatch v. U.S. Forest Service*, 776 F.Supp.2d 1042,  
 23 1052 (N.D. Cal. 2011). But even without such a strong showing on the first two  
 24 factors, Plaintiffs can easily show the third and fourth factors weigh in favor of an  
 25 injunction.

26 First, "the protection of constitutional rights is a strong equitable argument in  
 27 favor of issuing the injunction." *Lavan*, 797 F. Supp. 2d at 1019-20 (granting an  
 28

1 injunction against the City of Los Angeles, preventing it from seizing and  
 2 immediately destroying property in Skid Row). The City is bound by the United  
 3 States and California constitutions. Courts have consistently held that the public  
 4 interest is best served by enjoining unconstitutional or unlawful ordinance. “It is  
 5 always in the public’s interest to enjoin actions that violate an individual’s  
 6 constitutional rights, all the more so when this is being done in the name of their own  
 7 government.” *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (upholding a  
 8 preliminary injunction against a policy of racial profiling); *see also Awad v. Ziriox*  
 9 (670 F.3d 1111, 1131-1132 (10th Cir. 2012); *Diamond House of SE Idaho, LLC v.*  
 10 *City of Ammon*, 381 F.Supp.3d 1262, 1279 (D.Idaho, 2019) (holding that the public  
 11 interest is served by enjoining the implementation of an ordinance that the court  
 12 found was facially invalid under the Fair Housing Act, because the FHA serves an  
 13 important public interest).

14 Second, granting an injunction in this case will protect not just the  
 15 constitutional rights of the plaintiffs who are subjected to the ordinance, but also, the  
 16 rights of the more than 9000 people who are compelled to live on the streets in Los  
 17 Angeles and who are subjected to the City’s enforcement of the Bulky Item  
 18 Provision.<sup>11</sup> As in other cases where courts have granted injunctions against facially  
 19 invalid ordinances, “the ongoing enforcement of the potentially unconstitutional  
 20 regulations ... would infringe not only the [constitutional rights] of [plaintiffs], but  
 21 also the interests of other people” subjected to the same restrictions. *Klein v. City of*  
 22 *San Clemente*, 584 F.3d 1196, 1208 (9th Cir. 2009). Enjoining enforcement of the  
 23 Bulky Item Provision would stop those violations, and this weighs heavily in favor of  
 24

25 <sup>11</sup> According to the 2019 Los Angeles Homeless Count, there are approximately 3,488  
 26 people living in tents and 4,559 people living in makeshift encampments. *See*  
 27 [https://www.lahsa.org/documents?id=3468-2019-greater-los-angeles-homeless-](https://www.lahsa.org/documents?id=3468-2019-greater-los-angeles-homeless-count-vehicles-tents-and-makeshift-shelters-by-geographic-area.pdf)  
[count-vehicles-tents-and-makeshift-shelters-by-geographic-area.pdf](https://www.lahsa.org/documents?id=3468-2019-greater-los-angeles-homeless-count-vehicles-tents-and-makeshift-shelters-by-geographic-area.pdf).

1 finding that the public interest is served by issuing the requested injunction. *Id.*

2 On the other hand, the enforcement of a facially unconstitutional ordinance is  
 3 never in the public interest. As such, the City cannot argue, let alone prevail on the  
 4 argument, that it is in the public interest to continue to enforce a facially  
 5 unconstitutional ordinance. *See United States v. Alabama*, 691 F.3d 1269, 1301 (11th  
 6 Cir.2012) (“[f]rustration of federal statutes and prerogatives are not in the public  
 7 interest, and we discern no harm from the state's nonenforcement of invalid  
 8 legislation.”). To the extent the City argues that the Bulky Item Provision is  
 9 necessary to ensure clear and passable sidewalks or address public health threats,  
 10 these arguments were addressed in the Court’s ruling on Defendants’ Motion to  
 11 Dismiss. Order on Motion to Dismiss, Dkt. 36 at 9-10. As this Court noted, LAMC  
 12 56.11 and other ordinances allow the City to address immediate threats to health and  
 13 safety, illegal dumping, and obstacles that are blocking the sidewalks. *Id.* *See also*  
 14 *Mitchell*, 2017 WL 10545079 at \*4 (C.D. Cal. Sept. 25, 2017) (“There is no  
 15 additional exception for bulky items nor is one necessary”). Plaintiffs do not  
 16 challenge the City’s ability to remove true threats to public health and safety or to  
 17 move or in some instances, even remove items blocking the sidewalks or interfering  
 18 with city operations. So even if the City could establish that clean and passable  
 19 sidewalks were sufficient to justify the continued enforcement of an unconstitutional  
 20 law (which under Ninth Circuit precedent, they cannot), the City simply does not  
 21 need the facially unconstitutional provision of LAMC 56.11 to protect the public  
 22 interest. *See Cnty of Santa Clara v. Trump*, 250 F.Supp.3d 497, 539 (N.D.Cal.,  
 23 2017).

24 Finally, courts consider the permanence and duration of the harm in weighing  
 25 the equities of an injunction. The more permanent Plaintiffs’ harm is if relief is  
 26 denied and the more temporary Defendant’s harm if it is not, the greater the balance  
 27 tips toward Plaintiffs. *League of Wilderness Defenders*, 752 F.3d at 765. Here, this  
 28

weighs heavily in Plaintiffs' favor. If the City is not enjoined from enforcing the Bulky Item Provision, individuals in Los Angeles will be deprived of their belongings, and that deprivation is permanent. On the other hand, any harm the City could articulate would be temporary and last only for the pendency of the injunction.

#### IV. THE BOND REQUIREMENT SHOULD BE WAIVED

Where, as here, there is no likelihood of harm to the party enjoined, the requirement to post a bond may be dispensed with entirely. *Barahona-Gomez v. Reno*, 167 F.3d 1228, 1237 (9th Cir. 1999).

#### V. CONCLUSION

For the foregoing reasons, and upon good cause shown, Plaintiffs request the Court enter an injunction, enjoining the City of Los Angeles from:

1. Enforcing Section 56.11(3)(i) of the Los Angeles Municipal Code
2. Enforcing Section 56.11(10)(d) of the Los Angeles Municipal Code
3. Posting signs, notices, or other public information stating that the City may seize or immediately destroy any bulky items left in public.

Dated: February 26, 2020

Respectfully submitted,

LEGAL AID FOUNDATION OF LOS ANGELES

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**Local Rule 5-4.3.4 Attestation**

I attest that Plaintiffs' counsel, Benjamin Herbert and Catherine Sweetser, concurs in this filing's content and has authorized the filing.

DATED: February 26, 2020      LEGAL AID FOUNDATION OF LOS ANGELES

/s/ Shayla Myers

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,

Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF ADRIAN  
RISKIN**

1 Catherine Sweetser (SBN: 271142)  
2 Kristina Harootun (SBN: 308718)  
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17 *Attorneys for Plaintiffs Ktown for All, Ali El-Bey,*  
18 *Peter Diocson Jr., Marquis Ashley, Association for Responsible*  
19 *and Equitable Public Spending, and Janet Garcia.*  
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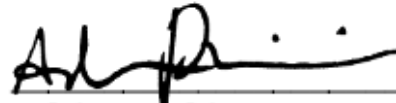
**DECLARATION OF ADRIAN RISKIN**

1. My name is Adrian Riskin. I have personal knowledge of the facts contained in this declaration, and if called to testify, I could and would testify competently as to the truth of the facts in this declaration.
2. I run an online blog called MichaelKohlhaas.org to increase government transparency and practice civic activism using the Public Records Act and to teach other activists how to use the Public Records Act.
3. I submit 15-20 Public Records Act requests a week for various agencies, including the City of Los Angeles.
4. Sometimes the City of Los Angeles emails the responses to me, sometimes they send links to cloud storage, sometimes they make me come to the City's offices to look at them on paper, and sometimes they mail them to my house. They sometimes use a program called NextRequest. My understanding is that NextRequest is a commonly used cloud sharing service which allows the government to upload documents and CPRA requesters to download the documents using a personal log-in. The City of Los Angeles has its own subdomain through NextRequest at lacity.nextrequest.com through which it can upload its CPRA responses. Each request is assigned its own number.
5. Because I was regularly requesting the daily clean-up schedules from the Department of Sanitation, the City of Los Angeles agreed to produce the daily clean-up schedules without me having to submit a formal Public Records Act request. The Department of Sanitation uploads the documents to NextRequest each morning and I am able to access the records by logging into NextRequest.

//

1 6. Attached as Exhibit A to this declaration are true and correct copies of  
2 the daily clean-up schedules from February 12, 2020 through  
3 February 24, 2020. I received these schedules through NextRequest  
4 using my personal log-in as part of Request #19-4996.  
5

6 I declare under penalty of perjury that the foregoing is true and  
7 correct. Executed on February 24, 2020 in Los Angeles, California.  
8

9 

10 **Adrian Riskin**  
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# EXHIBIT A



CITY OF LOS ANGELES

# CARE

CLEANING AND RAPID ENGAGEMENT



**TENTATIVE SCHEDULE:**  
Wednesday, February 12th @8:00 A.M.

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID - Illegal Dumping

**CARE Team 1 - Council District 1 - Call Sign CARE101**

	Address	Cross Street	Division	Comments
1	CODE 75		Hollenbeck	PROACTIVE INSERT
2	CODE 75		Hollenbeck	PROACTIVE INSERT
3	CODE 75		Hollenbeck	PROACTIVE INSERT
4	CODE 75		Hollenbeck	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Hollenbeck	PROACTIVE INSERT
6	CODE 75		Hollenbeck	PROACTIVE INSERT
7	CODE 75		Hollenbeck	PROACTIVE INSERT
8	CODE 75		Hollenbeck	PROACTIVE INSERT

**CARE Team 2 - Council District 2 - Call Sign CARE202**

	Address	Cross Street	Division	Comments
1	Lankershim	Kittridge	North Hollywood	
2	11924 Satcoy Street			
3	North side of Satcoy Street	West of Varna Avenue.	North Hollywood	
4	11300 Hartland	Tujunga	North Hollywood	

	Address	Cross Street	Division	Comments
5	Chandler Blvd.	170 fwy	North Hollywood	
6	7377 Greenbush Ave		North Hollywood	
7	10835 Chandler Blvd		North Hollywood	
8	CODE 75		North Hollywood	PROACTIVE INSERT

**CARE Team 3 - Council District 3 - Call Sign CARE203**

	Address	Cross Street	Division	Comments
1	19237 Ventura Blvd	Tampa	West Valley	1-1551649721
2	CODE 75		West Valley	PROACTIVE INSERT
3	CODE 75		West Valley	PROACTIVE INSERT
4	CODE 75		West Valley	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		West Valley	PROACTIVE INSERT
6	CODE 75		West Valley	PROACTIVE INSERT
7	CODE 75		West Valley	PROACTIVE INSERT
8	CODE 75		West Valley	PROACTIVE INSERT

**CARE Team 4 - Council District 4 - Call Sign CARE104**

	Address	Cross Street	Division	Comments
1	4503 Hollywood Blvd	Hillhurst Ave	Northeast	
2	Lyman	Clayton	Northeast	
3	Vermont	Prospect	Northeast	
4	4739 Hollywood Blvd	New Hampshire	Northeast	

	Address	Cross Street	Division	Comments
5	CODE 75		Northeast	PROACTIVE INSERT
6	CODE 75		Northeast	PROACTIVE INSERT
7	CODE 75		Northeast	PROACTIVE INSERT
8	CODE 75		Northeast	PROACTIVE INSERT

**CARE Team 5 - Council District 5 - Call Sign CARE405**

	Address	Cross Street	Division	Comments
1	859 N Highland Ave	Willoughby	WILSHIRE	
2	6121 Wilshire Blvd	Fairfax	WILSHIRE	
3	868 N La Cienega	Willoughby	WILSHIRE	
4	6351 W Olympic Blvd	Carillo Dr	WILSHIRE	

	Address	Cross Street	Division	Comments
5	Durango Ave and Exposition Blvd		PACIFIC	
6	CODE 75		PACIFIC	PROACTIVE INSERT
7	CODE 75		PACIFIC	PROACTIVE INSERT
8	CODE 75		PACIFIC	PROACTIVE INSERT

**CARE Team 6 - Council District 6 - Call Sign CARE206**

	Address	Cross Street	Division	Comments
1	8360 San Fernando Rd.	Olinda St.	Foothill	
2	7659 Simpson Ave.	Stagg St.	Foothill	
3	11501 Tuxford St.	San Fernando Rd.	Foothill	
4	7640 Lankershim Blvd.	Saticoy St.	Foothill	

	Address	Cross Street	Division	Comments
5	CODE 75		Foothill	PROACTIVE INSERT
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

**CARE Team 7 - Council District 7 - Call Sign CARE207**

	Address	Cross Street	Division	Comments
1	9070 Sunland Blvd	La Tuna Canyon Rd.	Foothill	1-1542562040
2	Van Nuys Blvd and Foothill Blvd.		Foothill	1-1537462851
3	13850 Van Nuys Blvd		Foothill	1-1543791931
4	10707 N El Dorado Ave		Foothill	1-1547348601

	Address	Cross Street	Division	Comments
5	CODE 75		Foothill	PROACTIVE INSERT
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

**CARE Team 8 - Council District 8 - Call Sign CARE308**

	Address	Cross Street	Division	Comments
1	1710 W 60TH ST, 90047	Between HARVARD BLVD and WESTERN AVE	77th St.	1-1535291691
2	7010 S DENVER AVE, 90044	Between 70TH ST and FLORENCE AVE	77th St.	1-1543474191
3	641 W 95TH ST, 90044	Between FIGUEROA ST and HOOVER ST	SE	1-1522702931
4	619 E 98TH ST, 90002	Between AVALON BLVD and STANFORD AVE	SE	1-1529902917

	Address	Cross Street	Division	Comments
5	CODE 75		SE	PROACTIVE INSERT
6	CODE 75		SE	PROACTIVE INSERT
7	CODE 75		SE	PROACTIVE INSERT
8	CODE 75		SE	PROACTIVE INSERT

**CARE Team 9 - Council District 9 - Call Sign CARE309**

	Address	Cross Street	Division	Comments
1	226 E. 84th Place	San Pedro	77th	
2	442 E. 84th Place	San Pedro	77th	
3	CODE 75		77th	PROACTIVE INSERT
4	CODE 75		77th	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		77th	PROACTIVE INSERT
6	CODE 75		77th	PROACTIVE INSERT
7	CODE 75		77th	PROACTIVE INSERT
8	CODE 75		77th	PROACTIVE INSERT

**CARE Team 10 - Council District 10 - Call Sign CARE316**

	Address	Cross Street	Division	Comments
1	3930 S ROXANNE AVE, 90008	Between AUGUST ST and POTOMAC AVE	SOUTHWEST	1-1543099626
2	2335 S HIGHLAND AVE, 90016	Between 21ST ST and LONGWOOD AVE	SOUTHWEST	1-1543091161
3	2928 S CARMONA AVE, 90016	Between HOMESIDE AVE and D/E	SOUTHWEST	1-1542803611
4	2923 S CARMONA AVE, 90016	Between HOMESIDE AVE and D/E	SOUTHWEST	1-1542798921

	Address	Cross Street	Division	Comments
5	CODE 75		SOUTHWEST	PROACTIVE INSERT
6	CODE 75		SOUTHWEST	PROACTIVE INSERT
7	CODE 75		SOUTHWEST	PROACTIVE INSERT
8	CODE 75		SOUTHWEST	PROACTIVE INSERT

**CARE Team 11 - Council District 11 - Call Sign CARE411**

	Address	Cross Street	Division	Comments
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	Address	Cross Street	Division	Comments
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1	401 S LINCOLN BLVD, 90291	Between FLOWER AVE and FLOWER CT	PACIFIC	1-1551498366
2	600 S COURTLAND ST., 90291	Between ROSE AVE and VERNON AVE	PACIFIC	1-1536987355
3	1918 S CANAL ST, 90291	Between MILDRED AVE and THE GRAND CL	PACIFIC	1-1539088921
4	12044 HAVELOCK AV, 90230	N/A	PACIFIC	1-1540989221

**CARE Team 12 - Council District 12 - Call Sign CARE212**

	Address	Cross Street	Division	Comments
1	Hayvenhurst at the 118		DEVONSHIRE	
2	ACROSS FROM 21723 PLUMMER		DEVONSHIRE	
3	9240 and 9261 Jordan		DEVONSHIRE	
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT

**CARE Team 13 - Council District 13 - Call Sign CARE113**

	Address	Cross Street	Division	Comments
1	94 N Bonnie Brae	Beverly	Rampart	
2	Echo Park Lake		Rampart	
3	123 S Alvarado St		Rampart	
4	1667 Beverly Blvd	Union Ave	Rampart	

**CARE Team 14 - Council District 14 - Call Sign CARE114**

	Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone
2	4892 Huntington Dr. S.	Castalia Ave	Hollenbeck	
3	5226 Huntington Dr. S.	Barett Rd.	Hollenbeck	
4	5488 Alhambra Ave.	5488 Alhambra Ave	Hollenbeck	

**CARE Team 15 - Council District 15 - Call Sign CARE315**

	Address	Cross Street	Division	Comments
1	IMPERIAL SECZ		SOUTHEAST	Special Enforcement and Cleaning Zone
2	CODE 75		HARBOR	PROACTIVE INSERT
3	CODE 75		HARBOR	PROACTIVE INSERT
4	CODE 75		HARBOR	PROACTIVE INSERT

5	CODE 75		PACIFIC	PROACTIVE INSERT
6	CODE 75		PACIFIC	PROACTIVE INSERT
7	CODE 75		PACIFIC	PROACTIVE INSERT
8	CODE 75		PACIFIC	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
8	CODE 75		DEVONSHIRE	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Rampart	PROACTIVE INSERT
6	CODE 75		Rampart	PROACTIVE INSERT
7	CODE 75		Rampart	PROACTIVE INSERT
8	CODE 75		Rampart	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	Lowell Ave at Alhambra Ave	Alhambra Avenue	Hollenbeck	
6	CODE 75		Hollenbeck	PROACTIVE INSERT
7	CODE 75		Hollenbeck	PROACTIVE INSERT
8	CODE 75		Hollenbeck	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		HARBOR	PROACTIVE INSERT
6	CODE 75		HARBOR	PROACTIVE INSERT
7	CODE 75		HARBOR	PROACTIVE INSERT
8	CODE 75		HARBOR	PROACTIVE INSERT



CITY OF LOS ANGELES

# CARE+

CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Wednesday, February 12th @7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

CAZADOR CARE+1- Council District 13											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102002	3761 W BEVERLY BLVD, 90004	JUANITA AVE		SIDEWALK/STREET	10 HE's; 17 postings.	4 hours	RAMPART	CARE124	Approved	DOT
2	191231008	510 N JUANITA AVE, 90004	CLINTON ST	MIDDLEBURY ST	SIDEWALK/STREET	6 HE's; 12 postings.	4 hours	RAMPART	CARE124	Approved	DOT
WASHINGTON CARE+1- Council District 14 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200206025	815 S CROCKER ST, 90021	9TH ST	8TH ST	SIDEWALK/STREET	11 Postings; 8 HE	6 HRs	NEWTON	CARE125	Approved	
2	200129014	506 N Bunker Hill Ave, 90012	N FIGUEROA ST	N GRAND AVE	SIDEWALK/STREET	12 Postings; 5 HE	2HRs	CENTRAL	CARE125	Approved	
DCT CARE+3- Council District 11 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200117006	932 E ROSE AVE, 90291	E ROSE AVE		SIDEWALK/STREET	31 HE(s)	4 hr(s)	PACIFIC	CARE426	Approved	
2	200207012	3840 S GRAND VIEW BLVD, 90066	PACIFIC AVE		SIDEWALK/STREET	9 HE(s)	2 hr(s)	PACIFIC	CARE426	Approved	
3	200114032	781 E MARR ST, 90291	E MARR ST		SIDEWALK/STREET	1 HE(s)	1 hr(s)	PACIFIC	CARE426	Approved	
4	200106002	11701 W WILSHIRE BLVD, 90049	Barrington Ave		SIDEWALK/STREET	1 HE (3 tents)	1 hr(s)	WEST LOS ANGELES	CARE426	Approved	
WASHINGTON CARE+2- Council District 10 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200122030	6038 W VENICE BLVD, 90034	SANTA MONICA BLVD		SIDEWALK/STREET	8 Postings; 13 HE, Bulky items, trash and debris.	6 HR	WILSHIRE	CARE427	Approved	DOT
2	200117013	5019 W NORTH VENICE BLVD	S REDONDO ST	W PICO BLVD	SIDEWALK/STREET	8 Postings; 5 HE's DOT RECOMMENDED	2 hrs,	WILSHIRE	CARE427	Approved	DOT
CARE+ ABH Team: SCHRADER A Bridge Home											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191007002	ABH SCHRADER	W SUNSET BLVD		Sidewalk/Street	ABH SCHRADER - keep open for 90 days	8 Hours	HOLLYWOOD	CARE428	Approved	
CARE+ ABH Team: ST ANDREWS A Bridge Home											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200103003	ABH ST ANDREWS [1]	ARLINGTON AVE	DENKER AVE	Sidewalk/Street	ABH ST. ANDREWS - keep open for 90 days Request LAPD in-pocket	8 Hours	77TH STREET	CARE329	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	San Pedro St (3rd St and 7th St) 4th St (Wall St and San Pedro St)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up. 50 HE(s)	8 Hours	CENTRAL	CARE121	Approved	
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200110015 200110019	35th St	(Hope St to Grand Ave) (22nd St to 39th St)	(35th St to 39th St)	SIDEWALK/STREET	4 HE's, 9 postings. Bulky items, bicycles, bicycles parts, trash and debris.	2.0 hour	NEWTON	CARE122	Approved	
2		Broadway			SIDEWALK/STREET	9 HE's 24 postings, Bulky items, trash and debris.	5.0 hour	NEWTON	CARE122	Approved	
3		Grand Ave			SIDEWALK/STREET	One HE's. 10 postings, Bulky items, trash and debris	1.0 hour	NEWTON	CARE122	Approved	
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200116001	1601 GRIFFITH AVE, 90021	E 16TH ST		Sidewalk/Street	15+ HEs, 28 Postings	8 Hours	NEWTON	CARE123	Approved	

[1] Prior backup at location



CITY OF LOS ANGELES  
**CARE**  
CLEANING AND RAPID ENGAGEMENT



**TENTATIVE SCHEDULE:**  
Thursday, February 13th @ 8:00 A.M

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID- Illegal Dumping

**CARE Team 1 - Council District 1 - Call Sign CARE101**

	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	1029 S. Beacon	11th/ Olympic	Rampart		5	CODE 75			NORTHEAST	PROACTIVE INSERT
2	Ave 61	between Figueroa/ Piedmont	Northeast		6	CODE 75			NORTHEAST	PROACTIVE INSERT
3	CODE 75		NORTHEAST	PROACTIVE INSERT	7	CODE 75			NORTHEAST	PROACTIVE INSERT
4	CODE 75		NORTHEAST	PROACTIVE INSERT	8	CODE 75			NORTHEAST	PROACTIVE INSERT

**CARE Team 2 - Council District 2 - Call Sign CARE202**

	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	Lankershim	Kittridge	North Hollywood		5	Chandler Blvd.	170 fwy		North Hollywood	
2	11924 Satcoy Street		North Hollywood		6	7377 Greenbush Ave			North Hollywood	
3	North side of Satcoy Street	West of Varna Avenue.	North hollywood		7	10835 Chandler Blvd			North Hollywood	
4	11300 Hartland	Tujunga	North hollywood		8	CODE 75			North Hollywood	PROACTIVE INSERT

**CARE Team 3 - Council District 3 - Call Sign CARE203**

	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	19237 Ventura Blvd	Tampa	West Valley	1-1551649721	5	CODE 75			West Valley	PROACTIVE INSERT
2	CODE 75		West Valley	PROACTIVE INSERT	6	CODE 75			West Valley	PROACTIVE INSERT
3	CODE 75		West Valley	PROACTIVE INSERT	7	CODE 75			West Valley	PROACTIVE INSERT
4	CODE 75		West Valley	PROACTIVE INSERT	8	CODE 75			West Valley	PROACTIVE INSERT

**CARE Team 4 - Council District 4 - Call Sign CARE204**

	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	Lankershim Blvd	134 FWY/ north of Riverside Dr	North Hollywood		5	CODE 75			North Hollywood	PROACTIVE INSERT
2	Vineland Ave	134 FWY/ north of Riverside Dr	North Hollywood		6	CODE 75			North Hollywood	PROACTIVE INSERT
3	Moorpark St	Bellflower/ under 101 FWY	North Hollywood		7	CODE 75			North Hollywood	PROACTIVE INSERT
4	CODE 75		North Hollywood	PROACTIVE INSERT	8	CODE 75			North Hollywood	PROACTIVE INSERT

**CARE Team 5 - Council District 5 - Call Sign CARE405**

	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	8808 Horner	Robertson	WEST LA		5	CODE 75			WEST LA	PROACTIVE INSERT
2	Missouri & Cotner		WEST LA	1-1551593411	6	CODE 75			WEST LA	PROACTIVE INSERT
3	9200 Exposition		WEST LA		7	CODE 75			WEST LA	PROACTIVE INSERT
4	3733 Durango		WEST LA		8	CODE 75			WEST LA	PROACTIVE INSERT

CARE Team 6 - Council District 6 - Call Sign CARE206										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	11935 Neenach Ave.	Located in Alley adjacent	Foothill			5	CODE 75		Van Nuys	PROACTIVE INSERT
2	7955 Vineland Ave.	Strathern St.	Foothill			6	CODE 75		Van Nuys	PROACTIVE INSERT
3	6420 Sylmar Ave	Gilmore St (between Victory- Gilmore)	Van Nuys			7	CODE 75		Van Nuys	PROACTIVE INSERT
4	14333 Bessemer St	Sylmar Ave/Tyrone Ave	Van Nuys			8	CODE 75		Van Nuys	PROACTIVE INSERT
CARE Team 7 - Council District 7 - Call Sign CARE207										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	11100 STRANWOOD	SAN FERNANDO MISSION	Mission	1-1514139421		5	15420 W Plummer St.	Sepulveda Blvd.	Mission	1-1547275921
2	SEPULVEDA/118 FWY	SEPULVEDA/118 FWY	Mission	1-1513218252		6	CODE 75		Mission	PROACTIVE INSERT
3	10715 Sepulveda Blvd.	Chatsworth St.	Mission	1-1544331311		7	CODE 75		Mission	PROACTIVE INSERT
4	15534 DEVONSHIRE	BLACKHAWK	Mission	1-1513276751		8	CODE 75		Mission	PROACTIVE INSERT
CARE Team 8 - Council District 8 - Call Sign CARE308										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone		5	1421 W 52ND ST, 90062	Between NORMANDIE AVE and HALLDALE AVE	77TH ST	1-1530095811
2	1558 W 59TH PL, 90047	Between HALLDALE AVE and DENKER AVE	77TH ST	1-1539382271		6	CODE 75		77TH ST	PROACTIVE INSERT
3	VAN NESS AVE AT HYDE PARK BLVD,	N/A	77TH ST	1-1535522891		7	CODE 75		77TH ST	PROACTIVE INSERT
4	2728 W 54TH ST, 90043	Between 5TH AVE and 6TH AVE	77TH ST	1-1519913301		8	CODE 75		77TH ST	PROACTIVE INSERT
CARE Team 9 - Council District 9 - Call Sign CARE109										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	2501 S SAN PEDRO ST, 90011	Between 25TH ST and ADAMS BLVD	NEWTON	1-1508109971		5	CODE 75		NEWTON	PROACTIVE INSERT
2	650 E 23RD ST, 90011	Between TRINITY ST and SAN PEDRO ST	NEWTON	1-1508152291		6	CODE 75		NEWTON	PROACTIVE INSERT
3	149 E 41ST PL, 90011	Between WOODLAWN AVE and WALL ST	NEWTON	1-1508221612		7	CODE 75		NEWTON	PROACTIVE INSERT
4	CODE 75		NEWTON	PROACTIVE INSERT		8	CODE 75		NEWTON	PROACTIVE INSERT
CARE Team 10 - Council District 10 - Call Sign CARE416										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	2103 S ORANGE DR, 90016	Between 21ST ST and BANGOR ST	WILSHIRE	1-1543010981		5	CODE 75		WILSHIRE	PROACTIVE INSERT
2	2327 S MANSFIELD AVE, 90016	Between 23RD ST and BANGOR ST	WILSHIRE	1-1543010541		6	CODE 75		WILSHIRE	PROACTIVE INSERT
3	5079 W BANGOR ST, 90016	Between MANSFIELD AVE and ORANGE DR	WILSHIRE	1-1543009211		7	CODE 75		WILSHIRE	PROACTIVE INSERT
4	5933 W BURCHARD AVE, 90034	Between D/E and VENICE BLVD	WILSHIRE	1-1542775861		8	CODE 75		WILSHIRE	PROACTIVE INSERT
CARE Team 11 - Council District 11 - Call Sign CARE411										
	Address	Cross Street	Division	Comments			Address	Cross Street	Division	Comments
1	1700 S PACIFIC AVE	Between MILDRED AVE AND 17TH AVE	Pacific			5	3807 S GRAND VIEW BLVD, 90066	VENICE BLVD / PACIFIC AVE	Pacific	
2	3557 S ROSEWOOD AVE, 90066	Between PALMS BLVD and MARCO PL	Pacific	1-1542381810		6	CODE 75		Pacific	PROACTIVE INSERT

3	3849 S KEESHEN DR, 90066	Between PACIFIC AVE and MITCHELL AVE	Pacific	1-1541978801	7	CODE 75		Pacific	PROACTIVE INSERT
4	12017 W NATIONAL BLVD, 90064	Between BURKSHIRE AVE and DAHLGREN AVE	Pacific	1-1541461711	8	CODE 75		Pacific	PROACTIVE INSERT

**CARE Team 12 - Council District 12 - Call Sign CARE212**

	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	Hayvenhurst at the 118		DEVONSHIRE		5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	ACROSS FROM 21723 PLUMMER		DEVONSHIRE		6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	9240 and 9261 Jordan		DEVONSHIRE		7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT	8	CODE 75		DEVONSHIRE	PROACTIVE INSERT

**CARE Team 13 - Council District 13 - Call Sign CARE413**

	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	SCHRADER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone	5	1750 Bronson	Carlos	Hollywood	
2	1809 Gower	101	Hollywood		6	CODE 75		Hollywood	PROACTIVE INSERT
3	1762 Tamarind	Carlos	Hollywood		7	CODE 75		Hollywood	PROACTIVE INSERT
4	6002 Carlos	Tamarind	Hollywood		8	CODE 75		Hollywood	PROACTIVE INSERT

**CARE Team 14 - Council District 14 - Call Sign CARE114**

	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone	5	7474 N. Figueroa	Under 134 FWY Bridge	Northeast	
2	5718 San Ramon Dr	Under San Pascual Bridge	Northeast		6	627 N. Dillion St.	Silver Lake Blvd	Rampart	UHRC Request
3	Marmion Way at Figueroa St	Figueroa Street	Northeast		7	CODE 75		Northeast	PROACTIVE INSERT
4	2901 Broadway	Under 2 FWY Bridge	Northeast		8	CODE 75		Northeast	PROACTIVE INSERT

**CARE Team 15 - Council District 15 - Call Sign CARE315**

	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	CARE Team to Support CARE+ posted locations.				5				
2					6				
3					7				
4					8				

**CARE Team River - Call Sign**

	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1					4				1-1423546642
2					5				
3					6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Thursday, February 13th @ 7:00 A.M

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

<b>WASHINGTON CARE+1 - Council District 9 Services:</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	
1	190815007	486 E 48TH ST, 90011	E 48TH ST	S AVALON ST	SIDEWALK/STREET	10 Postings 1 HE's	1 Hours	NEWTON	CARE124	Approved	
2	190107004	132 E 35TH ST, 90011	MAIN ST	MAPLE AVE.	SIDEWALK/STREET	10 Postings 3 HE	3 Hour's	NEWTON	CARE124	Approved	DOT
<b>DCT CARE+3- Council District 5 Services:</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	
1	200206006	7917 W BEVERLY BLVD, 90048	N HAYWORTH AVE	N ORANGE GROVE AVE	ALLEY	10 Postings 1 HE	1 Hour	WILSHIRE	CARE425	Approved	
2	200205016	8471 W BEVERLY BLVD, 90048	ALFRED ST		SIDEWALK/STREET	12 Postings 2 HE's	2 Hours	WILSHIRE	CARE425	Approved	DOT
3	200205017	317 S HOLT AVE, 90048	3RD ST	BURTON ST	SIDEWALK/STREET	1 HE	1 Hour	WILSHIRE	CARE425	Approved	
<b>DCT CARE+1- Council District 6 Services:</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	
1	200205003	14600 W TITUS ST, 91402	ROSCOE BLVD	LANARK ST	SIDEWALK/STREET	4 HE's, 20 postings	1.5 hours	MISSION	CARE226	Approved	
2	200206017	15611 PARTHENIA ST, 91343	ORION AVE	405 FWY	SIDEWALK/STREET	12 HE's, 6 on each side of the underpass, 26 Postings,	4.5 hours	DEVONSHIRE	CARE226	Approved	
<b>HARBOR CARE+1- Council District 15 Services:</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	
1	200123019	820 LOMITA BLVD, 90710	MCCOY	VERMONT AVE	SIDEWALK/STREET	40+ HE's, 20 Postings, tent/tarps, carts, bulky items, large amount of trash/debris, bikes/bike parts.	8+ hours	HARBOR	CARE327	Approved	
<b>CARE+ OHS Team</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	
1	200102027	6th St (Wall St and Kohler St) Ceres Ave (6th St and 7th St)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up.  6 th ST. between Wall St. and Kohler St. 16 Postings;30 HE,  Ceres Ave between 6 th and 7 th 10 Postings;8 HE,	8 Hours	CENTRAL	CARE121	Approved	
<b>CARE+ Grand Ave Team</b>											
Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral	

1	200113014 200130026 200113015	Grand Ave	(Vernon Ave to 55th St) (Flower St to Grand Ave) (Flower St to Grand Ave)	SIDEWALK/STREET	5 Postings; 1 HE,	1 HR	77TH STREET	CARE122	Approved	
2		59th Pl		SIDEWALK/STREET	5 Postings; 1 HE,	1 HR	77TH STREET	CARE122	Approved	
3		43rd St		SIDEWALK/STREET	5 Postings; 1 HE,	1 HR	NEWTON	CARE122	Approved	

**CARE+ DTLA Team**

	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200113017	1811 PALOMA ST, 90021	WASHINGTON BLVD	18TH ST.	SIDEWALK/STREET	14 Postings; 7 HEs and IDs	5 hours	NEWTON	CARE123	Approved	



CITY OF LOS ANGELES

# CARE

CLEANING AND RAPID ENGAGEMENT



**TENTATIVE SCHEDULE:**  
Friday, February 14th @ 8:00 A.M.

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID - Illegal Dumping

**CARE Team 1 - Council District 1 - Call Sign CARE101**

	Address	Cross Street	Division	Comments
1	CODE 75		Rampart	PROACTIVE INSERT
2	CODE 75		Rampart	PROACTIVE INSERT
3	CODE 75		Rampart	PROACTIVE INSERT
4	CODE 75		Rampart	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Rampart	PROACTIVE INSERT
6	CODE 75		Rampart	PROACTIVE INSERT
7	CODE 75		Rampart	PROACTIVE INSERT
8	CODE 75		Rampart	PROACTIVE INSERT

**CARE Team 2 - Council District 2 - Call Sign CARE202**

	Address	Cross Street	Division	Comments
1	4533 Laurel Canyon fwy	101 fwy overpass	North Hollywood	
2	Lankershim	134 fwy overpass	North Hollywood	
3	Vineland	170 fwy	North Hollywood	
4	Vanowen and Satsuma		North Hollywood	

	Address	Cross Street	Division	Comments
5	10835 Chandler Blvd		North Hollywood	
6	Lankershim and Erwin		North Hollywood	
7	CODE 75		North Hollywood	PROACTIVE INSERT
8	CODE 75		North Hollywood	PROACTIVE INSERT

**CARE Team 3 - Council District 3 - Call Sign CARE203**

	Address	Cross Street	Division	Comments
1	19945 Ventura Blvd	Ventura and Lubao ave	Topanga	1-1553634191
2	Etiwanda and Burbank	Etiwanda and Burbank	West Valley	1-1553313321
3	VANALDEN AVE AT HAMLIN		West Valley	1-1553661631
4	18424 Clark St	Reseda	West Valley	1-1553782921

	Address	Cross Street	Division	Comments
5	CODE 75		West Valley	PROACTIVE INSERT
6	CODE 75		West Valley	PROACTIVE INSERT
7	CODE 75		West Valley	PROACTIVE INSERT
8	CODE 75		West Valley	PROACTIVE INSERT

**CARE Team 4 - Council District 4 - Call Sign CARE404**

	Address	Cross Street	Division	Comments
1	Cahuenga	101 FWY/Cerritos Pl	Hollywood	
2	June St	De Longpre	Hollywood	
3	Sunset Blvd	Martel	Hollywood	
4	Sunset Blvd	La Brea Ave	Hollywood	

	Address	Cross Street	Division	Comments
5	1416 La Brea	De Longpre	Hollywood	
6	1896 El Cerrito Pl	Hillside Ave	Hollywood	
7	Odin	Fairfield	Hollywood	
8	CODE 75		Hollywood	PROACTIVE INSERT

**CARE Team 5 - Council District 5 - Call Sign CARE405**

	Address	Cross Street	Division	Comments
1	8405 Beverly Blvd	Orlando	WILSHIRE	
2	868 N La Cienega	Willoughby	WILSHIRE	
3	8151 Beverly Blvd	Kilkea	WILSHIRE	
4	7919 Beverly blvd	Hayworth	WILSHIRE	

	Address	Cross Street	Division	Comments
5	8025 Melrose	Laurel	WILSHIRE	
6	CODE 75		WILSHIRE	PROACTIVE INSERT
7	CODE 75		WILSHIRE	PROACTIVE INSERT
8	CODE 75		WILSHIRE	PROACTIVE INSERT

**CARE Team 6 - Council District 6 - Call Sign CARE206**

	Address	Cross Street	Division	Comments
1	14400 Van Nuys Blvd	Woodman Ave.	Mission	
2	14333 Roscoe Blvd/	Lennox Ave. (Located on Lennox)	Mission	
3	7755 Aqueduct Ave	Stagg St	West Valley	
4	CODE 75		West Valley	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		West Valley	PROACTIVE INSERT
6	CODE 75		West Valley	PROACTIVE INSERT
7	CODE 75		West Valley	PROACTIVE INSERT
8	CODE 75		West Valley	PROACTIVE INSERT

**CARE Team 7 - Council District 7 - Call Sign CARE207**

	Address	Cross Street	Division	Comments
1	8800 FOOTHILL BLVD		Foothill	1-1516592381 1-1514873269 1-1509087484
2	12244 VAN NUYS BLVD	210 FWY	Foothill	1-1515860750
3	BRADLEY/118 FWY		Foothill	1-1516310709
4	10601 GLENOAKS	MONTAGUE	Foothill	

	Address	Cross Street	Division	Comments
5	CODE 75		Foothill	PROACTIVE INSERT
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

**CARE Team 8 - Council District 8 - Call Sign CARE308**

	Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone
2	444 E 103RD ST, 90003	Between TOWNE AVE and AVALON BLVD	SOUTHEAST	1-1511247741
3	443 E 102ND ST, 90003	E 102ND ST	SOUTHEAST	1-1526746031
4	445 E 102ND ST, 90003	Between TOWNE AVE and 103RD ST	SOUTHEAST	1-1527493071

	Address	Cross Street	Division	Comments
5	826 E 109TH PL, 90059	Between MCKINLEY AVE and WADSWORTH AVE	SOUTHEAST	1-1532135871
6	10805 S GRAND AVE, 90061	Between 108TH ST and 109TH ST	SOUTHEAST	1-1515592388
7	CODE 75		SOUTHEAST	PROACTIVE INSERT
8	CODE 75		SOUTHEAST	PROACTIVE INSERT

**CARE Team 9 - Council District 9 - Call Sign CARE109**

	Address	Cross Street	Division	Comments
1	343 W. Vernon	Broadway	Newton	
2	110 Overpass(42nd Place)	Between Grand and Flower	Newton	
3	124 W 39TH ST, 90037	Between MAIN ST and BROADWAY PL	Newton	1-1508394081
4	2677 S ORCHARD AVE, 90007	Between ADAMS BLVD and 27TH ST	Newton	1-1547913071

	Address	Cross Street	Division	Comments
5	31st between Main and Broadway.		Newton	
6	CODE 75		Newton	PROACTIVE INSERT
7	CODE 75		Newton	PROACTIVE INSERT
8	CODE 75		Newton	PROACTIVE INSERT

**CARE Team 10 - Council District 10 - Call Sign CARE416**

	Address	Cross Street	Division	Comments
1	8592 W VENICE BLVD, 90034	Between LA CIENEGA BLVD and HARGIS ST	WILSHIRE	1-1538615401
2	8530 W VENICE BLVD, 90034	Between LA CIENEGA BLVD and CHARITON ST	WILSHIRE	1-1542711281
3	1971 S GARTH AVE, 90034	Between SAWYER ST and GUTHRIE AVE	WILSHIRE	1-1542899371
4	EDGEHILL DR AT MONT CLAIR ST, 90018	N/A	WILSHIRE	1-1504100341

	Address	Cross Street	Division	Comments
5	CODE 75		WILSHIRE	PROACTIVE INSERT
6	CODE 75		WILSHIRE	PROACTIVE INSERT
7	CODE 75		WILSHIRE	PROACTIVE INSERT
8	CODE 75		WILSHIRE	PROACTIVE INSERT

CARE Team 11 - Council District 11 - Call Sign CARE411									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	960 E ROSE AVE, 90291	Between FREDERICK ST and Nothing	PACIFIC	1-1542750918	5	Mildred between Pacific and Dell		PACIFIC	UHRC REQUEST
2	337 WASHINGTON BLVD , 90292	N/A	PACIFIC		6	CODE 75		PACIFIC	PROACTIVE INSERT
3	201 E MILDRED AVE	Between MILDRED AVE and CANAL ST	PACIFIC	1-1545505411	7	CODE 75		PACIFIC	PROACTIVE INSERT
4	337 S 4TH AVE, 90291	Between SUNSET AVE and ROSE AVE	PACIFIC	1-1553181190	8	CODE 75		PACIFIC	PROACTIVE INSERT
CARE Team 12 - Council District 12 - Call Sign CARE212									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	9240 and 9261 Jordan		DEVONSHIRE		5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	South Side of Parthenia between Reseda and Lindley		DEVONSHIRE		6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	Parthenia east of Reseda Blvd		DEVONSHIRE		7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	21701 Plummer Street		DEVONSHIRE		8	CODE 75		DEVONSHIRE	PROACTIVE INSERT
CARE Team 13 - Council District 13 - Call Sign CARE413/113									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	SCHRADER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone	5	418 N HOOVER	101	Rampart	
2	94 N Bonnie Brae	Beverly	Rampart		6	CODE 75		Rampart	PROACTIVE INSERT
3	123 S Alvarado St		Rampart		7	CODE 75		Rampart	PROACTIVE INSERT
4	1667 Beverly Blvd	Union Ave	Rampart		8	CODE 75		Rampart	PROACTIVE INSERT
CARE Team 14 - Council District 14 - Call Sign CARE114									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone	5	794 Stanford Avenue	E. 8th Street	Newton	
2	2429 Olympic Boulevard	Santa Fe Ave	Newton		6	CODE 75		Newton	PROACTIVE INSERT
3	917 San Julian Street	Alley	Newton		7	CODE 75		Newton	PROACTIVE INSERT
4	831 Crocker Street	Alley	Newton		8	CODE 75		Newton	PROACTIVE INSERT
CARE Team 15 - Council District 15 - Call Sign CARE315									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	IMPERIAL SECZ		SOUTHEAST	Special Enforcement and Cleaning Zone	5	CODE 75		SOUTHEAST	PROACTIVE INSERT
2	CODE 75		SOUTHEAST	PROACTIVE INSERT	6	CODE 75		SOUTHEAST	PROACTIVE INSERT
3	CODE 75		SOUTHEAST	PROACTIVE INSERT	7	CODE 75		SOUTHEAST	PROACTIVE INSERT
4	CODE 75		SOUTHEAST	PROACTIVE INSERT	8	CODE 75		SOUTHEAST	PROACTIVE INSERT
CARE Team River - Call Sign									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1					4				1-1423546642
2					5				
3					6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Friday, February 14th @ 7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

WASHINGTON CARE +1 - Council District 14 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200107011	2005 E 4TH ST, 90033	STATE ST	ST LOUIS ST	SIDEWALK/STREET	6 HE: Bulky items, trash & debris, 12 postings	3 hour	HOLLENBECK	CARE124	Approved	
2	200116007	1137 E 1ST ST, 90033	MYERS ST	MONO ST	SIDEWALK/STREET	10 HE: Bulky items, Bulky item Structures posted, trash & debris, 10 postings	5 hour	HOLLENBECK	CARE124	Approved	
EAST VALLEY CARE+1- Council District 7 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
	1-1545838031	13900 N SAN FERNANDO ROAD, 91342			Sidewalk/Street					Illegal Dump	
CAZADOR CARE+1- Council District 13 Services :											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102017	1204 N VINE ST, 90038	LEXINGTON AVE	N EL CENTRO	SIDEWALK/STREET	5 HE's; 14 postings.	2 hours	HOLLYWOOD	CARE425	Approved	DOT
2	190603005	6227 W LA MIRADA AVE, 90038	VINE ST.	EL CENTRO AVE.	SIDEWALK/STREET	4 HE's; 9 postings.	2 hours	HOLLYWOOD	CARE425	Approved	DOT
3	191224012	1431 N VINE ST, 90028	SUNSET BLVD	DE LONGPRE AVE	SIDEWALK/STREET	3 HE's; 7 postings.	1 hour	HOLLYWOOD	CARE425	Approved	DOT
4	200211051	1419 N EL CENTRO AVE, 90028	SUNSET BLVD	DE LONGPRE AVE	SIDEWALK/STREET	5 HE's; 11 postings.	3 hours	HOLLYWOOD	CARE425	Approved	DOT
DCT CARE+1- Council District 3 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200207034	21825 W CALIFA ST, 91367	W CALIFA ST		SIDEWALK/STREET	4HE(s)	2.5 hour(s)	TOPANGA	CARE226	Approved	
2	200130007	5425 N RESEDA BLVD, 91356	BURBANK BLVD	VENTURA BLVD	SIDEWALK/STREET	3 HE	1.5 hour(s)	WEST VALLEY	CARE226	Approved	
3	190909007	19928 W VENTURA BLVD, 91356	OAKDALE AVE	PENFIELD AVE	SIDEWALK/STREET	2 HE	1 hour(s)	TOPANGA	CARE226	Approved	
4	200211057	5600 N LUBAO AVE, 91364	VENTURA BLVD		SIDEWALK/STREET	1 HE	1.5 hour(s)	TOPANGA	CARE226	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	San Pedro St (7th St to 8th St) Crocker St (7th St to 8th St) Kohler St (7th St to 8th St) Agatha St (San Pedro and Towne Ave)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up. Crocker (7 th to 8 th ), 12 Postings; 21 HE Agatha St (San Pedro to Towne Ave. 10 Postings; 8 HE Kholer (7 th -8 th ) 10 Postings; 2 HE	8 hrs	NEWTON	CARE121	Approved	
CARE+ OHS Venice Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191114001 191022006	OHS VENICE, 90291 OHS VENICE - 3RD AND ROSE			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATION	8 hrs	PACIFIC	CARE427	Approved	DOT
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200114002 200121004 200113012	88th Pl	(Flower St to Grand Ave) (40th Pl to 41st St) (Florence Ave to 84th Pl) (Hope St to Grand Ave)		SIDEWALK/STREET	6 Postings; 4 HEs,	2 HR	SOUTHEAST	CARE322	Approved	
2		Flower St			SIDEWALK/STREET	0 Postings; 0 HE,	0 HRs	NEWTON	CARE322	Approved	
3		Grand Ave			SIDEWALK/STREET	24 Postings; 2 HE	3 HR	NEWTON	CARE322	Approved	
4		35th St			SIDEWALK/STREET	0 Postings; 0 HE,	0 HRs	NEWTON	CARE322	Approved	
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	190503018	1211 S LONG BEACH AVE, 90021	E OLYMPIC BLVD.	E 14TH. ST.	SIDEWALK/STREET	3 HE's 9 postings, Bulky items, trash and debris.	2.0 hour	NEWTON	CARE123	Approved	
2	200204048	1415 E NEWTON ST, 90021	E NEWTON ST		SIDEWALK/STREET	3 HE's and one BIS 19 postings, Bulky items, trash and debris.	4.0 hour	NEWTON	CARE123	Approved	
3	200203012	930 S MCGARRY ST, 90021	OLYMPIC BLVD	E 14TH ST	SIDEWALK/STREET	4 HE's 18 postings, Bulky items, shopping cart, luggage, trash and debris.	2.0 hour	NEWTON	CARE123	Approved	



CITY OF LOS ANGELES

# CARE

CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
February 18th, 2020 @ 8 a.m.

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID- Illegal Dumping

### CARE Team 1 - Council District 1 - Call Sign CARE 101

	Address	Cross Street	Division	Comments
1	ABH Zone		Rampart	
2	CODE 75		Rampart	PROACTIVE INSERT
3	CODE 75		Rampart	PROACTIVE INSERT
4	CODE 75		Rampart	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Rampart	PROACTIVE INSERT
6	CODE 75		Rampart	PROACTIVE INSERT
7	CODE 75		Rampart	PROACTIVE INSERT
8	CODE 75		Rampart	PROACTIVE INSERT

### CARE Team 2 - Council District 2 - Call Sign CARE 202

	Address	Cross Street	Division	Comments
1	7310 Van Nuys Blvd		Van Nuys	
2	7250 Van Nuys Blvd	Sherman Way	Van Nuys	
3	7330 Van Nuys Blvd	Wyandotte St	Van Nuys	
4	Gault St.	between Woodman and Mammoth	Van Nuys	

	Address	Cross Street	Division	Comments
5	7135 Woodman Ave	Sherman Way	Van Nuys	
6	CODE 75		Van Nuys	PROACTIVE INSERT
7	CODE 75		Van Nuys	PROACTIVE INSERT
8	CODE 75		Van Nuys	PROACTIVE INSERT

### CARE Team 3 - Council District 3 - Call Sign CARE 203

	Address	Cross Street	Division	Comments
1	8311 Mason Ave	Roscoe	Devonshire	1-1554529921
2	18424 Clark St	Reseda	West Valley	1-1554532431
3	5630 Corbin Ave	Ventura	West Valley	1-1554532901
4	7647 Derring Ave	Saticoy	Topanga	1-1554662121

	Address	Cross Street	Division	Comments
5	CODE 75		Topanga	PROACTIVE INSERT
6	CODE 75		Topanga	PROACTIVE INSERT
7	CODE 75		Topanga	PROACTIVE INSERT
8	CODE 75		Topanga	PROACTIVE INSERT

### CARE Team 4 - Council District 4 - Call Sign CARE 404

	Address	Cross Street	Division	Comments
1	4503 Hollywood Blvd	Hillhurst Ave	Northeast	
2	Lyman	Clayton	Northeast	
3	Vermont Ave	Prospect Ave	Northeast	
4	4739 Hollywood Blvd	New Hampshire	Northeast	

	Address	Cross Street	Division	Comments
5	CODE 75		Northeast	PROACTIVE INSERT
6	CODE 75		Northeast	PROACTIVE INSERT
7	CODE 75		Northeast	PROACTIVE INSERT
8	CODE 75		Northeast	PROACTIVE INSERT

### CARE Team 5 - Council District 5 - Call Sign CARE 405

	Address	Cross Street	Division	Comments
1	8025 Melrose	Laurel	WILSHIRE	
2	7919 Beverly Blvd	Hayworth	WILSHIRE	
3	8151 Beverly Blvd	Kilkea	WILSHIRE	
4	6099 Wilshire Blvd	Fairfax	WILSHIRE	

	Address	Cross Street	Division	Comments
5	CODE 75		WILSHIRE	PROACTIVE INSERT
6	CODE 75		WILSHIRE	PROACTIVE INSERT
7	CODE 75		WILSHIRE	PROACTIVE INSERT
8	CODE 75		WILSHIRE	PROACTIVE INSERT

### CARE Team 6 - Council District 6 - Call Sign 206

	Address	Cross Street	Division	Comments
1	15319 Wyandotte St	Sepulveda Blvd	Van Nuys	
2	14512 W KITTRIDGE ST	Van Nuys Blvd	Van Nuys	
3	6100 Sepulveda Blvd	Erwin St	Van Nuys	
4	CODE 75		Van Nuys	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Van Nuys	PROACTIVE INSERT
6	CODE 75		Van Nuys	PROACTIVE INSERT
7	CODE 75		Van Nuys	PROACTIVE INSERT
8	CODE 75		Van Nuys	PROACTIVE INSERT

### CARE Team 7 - Council District 7 - Call Sign 207

	Address	Cross Street	Division	Comments
1	10601 Glenoaks	Montague	Foothill	
2	Branford	Telfair	Foothill	1-1545120871
3	10707 N El Dorado Ave		Foothill	1-1547348601
4	Remick	Sunburst	Foothill	1-1500543646

	Address	Cross Street	Division	Comments
5	CODE 75		Foothill	PROACTIVE INSERT
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

### CARE Team 8 - Council District 8 - Call Sign 308

	Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone
2	8501 S VERMONT AVE, 90044	Between MANCHESTER AVE and D/E	77TH ST	1-1490894407
3	964 W MANCHESTER AVE, 90044	Between MENLO AVE and VERMONT AVE	77TH ST	1-1493017261
4	1047 W MANCHESTER AVE, 90044	Between VERMONT AVE and KANSAS AVE	77TH ST	1-1492997001

	Address	Cross Street	Division	Comments
5	1016 W 85TH ST, 90044	BETWEEN VERMONT AVE and KANSAS AVE	77TH ST	1-1491404921
6	CODE 75		77TH ST	PROACTIVE INSERT
7	CODE 75		77TH ST	PROACTIVE INSERT
8	CODE 75		77TH ST	PROACTIVE INSERT

### CARE Team 9 - Council District 9 - Call Sign 309

	Address	Cross Street	Division	Comments
1	1106 W. 53rd	Budlong to Vermont	77th	
2	443 E 83RD ST, 90003	Between TOWNE AVE and AVALON BLVD	77th	1-1547773401
3	451 E 71ST ST, 90003	Between SAN PEDRO ST and AVALON BLVD	77th	1-1547706931
4	1217 1/2 W 60TH PL, 90044	Between BUDLONG AVE and RAYMOND AVE	77th	1-1547431661

	Address	Cross Street	Division	Comments
5	CODE 75		77TH ST	PROACTIVE INSERT
6	CODE 75		77TH ST	PROACTIVE INSERT
7	CODE 75		77TH ST	PROACTIVE INSERT
8	CODE 75		77TH ST	PROACTIVE INSERT

### CARE Team 10 - Council District 10 - Call Sign 416

	Address	Cross Street	Division	Comments
1	1819 S Western	Manhattan Pl & 18th Street	Olympic	
2	WASHINGTON BLVD AT WESTERN AVE	N/A	Olympic	1-1537196031
3	WASHINGTON BLVD AT WEST BLVD, 90016		Olympic	1-1510430511
4	1717 S Western	Venice	Olympic	

	Address	Cross Street	Division	Comments
5	CODE 75		Olympic	PROACTIVE INSERT
6	CODE 75		Olympic	PROACTIVE INSERT
7	CODE 75		Olympic	PROACTIVE INSERT
8	CODE 75		Olympic	PROACTIVE INSERT

### CARE Team 11 - Council District 11 - Call Sign 411

	Address	Cross Street	Division	Comments
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	Address	Cross Street	Division	Comments
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1	3840 Grand View Blvd	Pacific Ave.	Pacific	
2	Pico/ Centinela			
3	Ohio/ Bundy	N/A	Pacific	
4	Cotner Ave at Missouri		Pacific	1-1551593411

5	CODE 75		Pacific	PROACTIVE INSERT
6	CODE 75		Pacific	PROACTIVE INSERT
7	CODE 75		Pacific	PROACTIVE INSERT
8	CODE 75		Pacific	PROACTIVE INSERT

**CARE Team 12 - Council District 12 - Call Sign 212**

	Address	Cross Street	Division	Comments
1	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
8	CODE 75		DEVONSHIRE	PROACTIVE INSERT

**CARE Team 13 - Council District 13 - Call Sign 413**

	Address	Cross Street	Division	Comments
1	SCHRAMER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone
2	3050 W LOS FELIZ BLVD		NORTHEAST	
3	CODE 75		NORTHEAST	PROACTIVE INSERT
4	CODE 75		NORTHEAST	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		NORTHEAST	PROACTIVE INSERT
6	CODE 75		NORTHEAST	PROACTIVE INSERT
7	CODE 75		NORTHEAST	PROACTIVE INSERT
8	CODE 75		NORTHEAST	PROACTIVE INSERT

**CARE Team 14 - Council District 14 - Call Sign 114**

	Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone
2	3140 E. Olympic St	S Grande Vista Ave	Hollenbeck	1-1537341491
3	1051 Kingston Ave	N State St	Hollenbeck	1-1533646941
4	Velasco St	15th St	Hollenbeck	1-1525108641

	Address	Cross Street	Division	Comments
5	2203 E 1st St	N Chicago St	Hollenbeck	1-1525393911
6	CODE 75		Hollenbeck	PROACTIVE INSERT
7	CODE 75		Hollenbeck	PROACTIVE INSERT
8	CODE 75		Hollenbeck	PROACTIVE INSERT

**CARE Team 15 - Council District 15 - Call Sign 315**

	Address	Cross Street	Division	Comments
1	CODE 75		SOUTHEAST	PROACTIVE INSERT
2	CODE 75		SOUTHEAST	PROACTIVE INSERT
3	CODE 75		SOUTHEAST	PROACTIVE INSERT
4	CODE 75		SOUTHEAST	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		SOUTHEAST	PROACTIVE INSERT
6	CODE 75		SOUTHEAST	PROACTIVE INSERT
7	CODE 75		SOUTHEAST	PROACTIVE INSERT
8	CODE 75		SOUTHEAST	PROACTIVE INSERT

**CARE Team River - Call Sign 117**

	Address	Cross Street	Division	Comments
1				
2				
3				

	Address	Cross Street	Division	Comments
4				1-1423546642
5				
6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
February 18th, 2020 @ 7 a.m.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

CAZADOR CARE+1 - Council District 1 Ser											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200129014	506 N Bunker Hill Ave, 90012	N FIGUEROA ST	N GRAND AVE	SIDEWALK/STREET	4 HE's, 10 Postings, tents, tarps, trash, bulky items, carts.	2.0-3.0 hour	CENTRAL		Approved	
2	200110002	406 N FIGUEROA ST, 90012	FIGUEROA	SUNSET	SIDEWALK/STREET	4 HE's, 11 Postings, tents, tarps, trash, bulky items, carts, bikes & bike parts, needles.	2.0-3.0 hour	CENTRAL		Approved	
EAST VALLEY CARE+1 - Council District 4 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200212012	5224 COLDWATER CANYON AVE, 91401	CHANDLER BLVD	W MAGNOLIA BLVD	SIDEWALK/STREET	1 HE, 10 Postings, bikes, chairs, bulky items/trash and debris, and smell of urine and feces.	1-2 hour	VAN NUYS		Approved	
DCT CARE+1 - Council District 3 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
3	200128022	18438 SHERMAN WAY, 91335	W SHERMAN WAY	GAULT ST	SIDEWALK/STREET	7 HE's, 12+ Postings, bikes, chairs, bulky items/trash and debris, and smell of urine and feces.	2.0-3.0 hour	WEST VALLEY		Approved	
2	191121009	8311 N MASON AVE, 91306	SCHOENBORN ST	ROSCOE BLVD	SIDEWALK/STREET	2 HE's, 8 Postings, bikes, chairs, bulky items/trash and debris, and smell of urine and feces.	1-2 hour	DEVONSHIRE		Approved	
3	200127008	9037 INDEPENDENCE AVE, 91311	NORDHOFF ST		SIDEWALK/STREET	1 HE and 4 RVs at location, 12+ Postings, bikes, chairs, bulky items/trash and debris, and smell of urine and feces. Trash and bulkies extending from RVs to sidewalk and street.	1 hour	DEVONSHIRE		Approved	
HARBOR CARE+1 - Council District 8 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200207010	7000 S VERMONT AVE, 90044	68TH ST	W FLORENCE AVE	SIDEWALK/STREET	1 HE's, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	1 hour	77TH STREET		Approved	
2	200114022	7215 S ST ANDREWS PL, 90047	GRAMERCY PL	ST ANDREWS PL	ALLEY	3 HE's, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	3 hours	77TH STREET		Approved	
3	200108004	857 W 77TH ST, 90044	VERMONT ST	HOOVER ST	ALLEY	4+ HE's, cannot see how many HE's in Alleyway. Dog in alleyway did not seem nice (Pit-bull), tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	4-6 hours	77TH STREET		Approved	
CARE+ ABH Team: SITE A Bridge Home											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200131043	El Pueblo ABH Permanent Posted Cleanup			Sidewalk/Street			CENTRAL		Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	7th St (Wall St and Kohler St)			Sidewalk/Street	PLEASE DO NOT CLOSE AUTHORIZATION Expanded Skidrow Concentrated Clean up, 7 th St (Wall St to Kohler St) 25 hes, 20 postings	8 hrs	CENTRAL	Care 121	Approved	
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200109005 200109005 200109006 200109006 200109002	38th St	(Grand Ave to Hope St) (Grand Ave to Flower Dr) (Grand Ave to Hope St) (31st St to Jefferson Blvd) (Flower St to Grand Ave)		SIDEWALK/STREET	10+ HE's, 15 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	.5 hours	NEWTON	Care 322	Approved	
2		39th St			SIDEWALK/STREET	2+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	.5 hours	NEWTON		Approved	
3		33rd St			SIDEWALK/STREET	10+ HE's, 15 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	2 hrs	NEWTON		Approved	
4		Hope St			SIDEWALK/STREET	6+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	1 hour	NEWTON		Approved	
5		47th St			SIDEWALK/STREET	15+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	4 hours	NEWTON		Approved	
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102005	1201 L.A. LIVE WAY, 90015	W 12TH ST		SIDEWALK/STREET	10+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	1 hour	RAMPART	Care 123	Approved	
2	200109008	817 W VENICE BLVD, 90015	110FWY		SIDEWALK/STREET	10+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	1.5 hours	RAMPART		Approved	
3	200109010	1432 OAK ST, 90015	W VENICE BLVD		SIDEWALK/STREET	10+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	4 hours	RAMPART		Approved	
4	200116015	1013 W 8TH ST, 90017	FRANCISCO ST	BIXEL ST	SIDEWALK/STREET	10+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	.5 hours	CENTRAL		Approved	
5	200109009	1111 JAMES M WOOD BLVD, 90015	8TH PL		SIDEWALK/STREET	10+ HE's, 10 Postings, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	1 hour	RAMPART		Approved	DOT

CITY OF LOS ANGELES					environment LASANTATION CITY OF LOS ANGELES			
TENTATIVE SCHEDULE: Wednesday, February 19th @ 8:00 A.M.					Please contact your supervisor if you have any questions. * HE - Homeless Encampments * ID - Illegal Dumping			
CARE Team 1 - Council District 1 - Call Sign CARE 101								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 CODE 75		Rampart	PROACTIVE INSERT		5 CODE 75		Rampart	PROACTIVE INSERT
2 CODE 75		Rampart	PROACTIVE INSERT		6 CODE 75		Rampart	PROACTIVE INSERT
3 CODE 75		Rampart	PROACTIVE INSERT		7 CODE 75		Rampart	PROACTIVE INSERT
4 CODE 75		Rampart	PROACTIVE INSERT		8 CODE 75		Rampart	PROACTIVE INSERT
CARE Team 2 - Council District 2 - Call Sign CARE202								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 Lankershim	Kittridge(alleyway behind Troost)	North Hollywood			5 Vineland/Bellflower/Moorpark	134 fwy underpass	North Hollywood	
2 10835 Chandler Blvd	In between Denny Ave and Satsuma	North Hollywood			6 CODE 75		North Hollywood	PROACTIVE INSERT
3 Lankershim and Erwin	along Erwin and along Lankershim	North Hollywood			7 CODE 75		North Hollywood	PROACTIVE INSERT
4 Vineland/Aqua vista st	170 fwy underpass	North Hollywood			8 CODE 75		North Hollywood	PROACTIVE INSERT
CARE Team 3 - Council District 3 - Call Sign CARE203								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 5563 Winnetka Ave		Topanga	1-1556499311		5 CODE 75		West Valley	PROACTIVE INSERT
2 5636 Corbin Ave	Ventura	West Valley	1-1556368191		6 CODE 75		West Valley	PROACTIVE INSERT
3 CODE 75		West Valley	PROACTIVE INSERT		7 CODE 75		West Valley	PROACTIVE INSERT
4 CODE 75		West Valley	PROACTIVE INSERT		8 CODE 75		West Valley	PROACTIVE INSERT
CARE Team 4 - Council District 4 - Call Sign CARE404								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 758 N Highland Avenue	Waring Avenue	Olympic			5 CODE 75		Olympic	PROACTIVE INSERT
2 10 St	Gramercy	Olympic			6 CODE 75		Olympic	PROACTIVE INSERT
3 957 S Wilton Pl	San Marino St	Olympic			7 CODE 75		Olympic	PROACTIVE INSERT
4 CODE 75		Olympic	PROACTIVE INSERT		8 CODE 75		Olympic	PROACTIVE INSERT
CARE Team 5 - Council District 5 - Call Sign CARE405								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 3416 S MANNING AVE	National	WEST LA	1-1540498796		5 CODE 75		WEST LA	PROACTIVE INSERT
2 Sepulveda under 10 fwy	Between Pico and National	WEST LA	1-1547626561		6 CODE 75		WEST LA	PROACTIVE INSERT
3 Cotner East of 405	Just north of Santa Monica	WEST LA			7 CODE 75		WEST LA	PROACTIVE INSERT
4 3761 Jasmine	Venice	WEST LA			8 CODE 75		WEST LA	PROACTIVE INSERT
CARE Team 6 - Council District 6 - Call Sign CARE206								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 Greenbush Ave.	Saticoy St.	Mission	1-1553440621		5 CODE 75		Mission	PROACTIVE INSERT
2 9700 Woodman Avenue	Located in the alley	Mission			6 CODE 75		Mission	PROACTIVE INSERT
3 7815 Van Nuys Blvd	Arminta Ave (Center Median)	Mission			7 CODE 75		Mission	PROACTIVE INSERT
4 8785 Parthenia Place	Sepulveda Blvd.	Mission			8 CODE 75		Mission	PROACTIVE INSERT
CARE Team 7 - Council District 7 - Call Sign CARE207								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 12910 SAN FERNANDO RD NORTHEAST	BLEDSOE	Mission	1-1508291231		5 Silver Oaks	Baboa Blvd	Mission	1-1543896281
2 SAN FERNANDO RD NORTHEAST ROW	NORTHEAST ROW/BLEDSOE	Mission	1-1514268391		6 CODE 75		Mission	PROACTIVE INSERT
3 SAN FERNANDO RD NORTHEAST ROW	NORTHEAST ROW	Mission	1-1506540611		7 CODE 75		Mission	PROACTIVE INSERT
4 Kadota St.	San Fernando Rd.	Mission	1-1554775531		8 CODE 75		Mission	PROACTIVE INSERT
CARE Team 8 - Council District 8 - Call Sign CARE308								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 1569 W 49TH ST, 90062	Between DENKER AVE and HARVARD BLVD	77TH ST	1-1493085891		5 CODE 75		77TH ST	PROACTIVE INSERT
2 1553 W 49TH ST, 90062	Between DENKER AVE and HARVARD BLVD	77TH ST	1-1493079201		6 CODE 75		77TH ST	PROACTIVE INSERT
3 1665 W 52ND ST, 90062	Between DENKER AVE and WESTERN AVE	77TH ST	1-1491872371		7 CODE 75		77TH ST	PROACTIVE INSERT
4 1739 W 52ND ST, 90062	Between DENKER AVE and WESTERN AVE	77TH ST	1-1505529531		8 CODE 75		77TH ST	PROACTIVE INSERT
CARE Team 9 - Council District 9 - Call Sign CARE109								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 6900 Avalon		Newton			5 CODE 75		NEWTON	PROACTIVE INSERT
2 6800 Avalon		Newton			6 CODE 75		NEWTON	PROACTIVE INSERT
3 6700 Avalon		Newton			7 CODE 75		NEWTON	PROACTIVE INSERT
4 55th and Avalon	Avalon	NEWTON			8 CODE 75		NEWTON	PROACTIVE INSERT
CARE Team 10 - Council District 10 - Call Sign CARE316								
Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1 4089 S LEIMERT BLVD, 90008	Between SUTRO AVE and STOCKER PL	Southwest	1-1552217421		5 CODE 75		Southwest	PROACTIVE INSERT
2 3020 S CRENSHAW BLVD, 90016	Between 30TH ST and JEFFERSON BLVD	Southwest	1-1552522481		6 CODE 75		Southwest	PROACTIVE INSERT
3 2800 S CRENSHAW BLVD, 90016	Between 28TH ST and 29TH ST	Southwest	1-1518234011		7 CODE 75		Southwest	PROACTIVE INSERT

4	2300 W.JEFFERSON BLVD, 90018	Between 3RD AVE and 4TH AVE	Southwest	1-1495624841	8	CODE 75		Southwest	PROACTIVE INSERT
<b>CARE Team 11 - Council District 11 - Call Sign CARE411</b>									
	<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>		<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>
1	3840 Grand View Blvd	Pacific Ave.	Pacific		5	CODE 75		Pacific	PROACTIVE INSERT
2	CULVER BLVD AT MCCONNELL AVE	N/A		1-1526905381	6	CODE 75		Pacific	PROACTIVE INSERT
3	MILDRED AVE AT STRONG'S DR	N/A	Pacific	1-1534759081	7	CODE 75		Pacific	PROACTIVE INSERT
4	923 E VENICE BLVD, 90291	Lincoln	Pacific	1-1521160918	8	CODE 75		Pacific	PROACTIVE INSERT
<b>CARE Team 12 - Council District 12 - Call Sign CARE212</b>									
	<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>		<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>
1	CODE 75		DEVONSHIRE	PROACTIVE INSERT	5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	CODE 75		DEVONSHIRE	PROACTIVE INSERT	6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	CODE 75		DEVONSHIRE	PROACTIVE INSERT	7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT	8	CODE 75		DEVONSHIRE	PROACTIVE INSERT
<b>CARE Team 13 - Council District 13 - Call Sign CARE113</b>									
	<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>		<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>
1	ECHO PARK LAKE		RAMPART		5	CODE 75		RAMPART	PROACTIVE INSERT
2	CODE 75		RAMPART	PROACTIVE INSERT	6	CODE 75		RAMPART	PROACTIVE INSERT
3	CODE 75		RAMPART	PROACTIVE INSERT	7	CODE 75		RAMPART	PROACTIVE INSERT
4	CODE 75		RAMPART	PROACTIVE INSERT	8	CODE 75		RAMPART	PROACTIVE INSERT
<b>CARE Team 14 - Council District 14 - Call Sign CARE114</b>									
	<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>		<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone	5	5401 Huntington Dr. N.	Stillwell Ave	Hollenbeck	1-1535265801
2	4892 Huntington Dr. S.	Castalia Ave	Hollenbeck		6	1400 S Grande vista ave		Hollenbeck	PROACTIVE INSERT
3	5135 E Huntington Dr	Barett Rd.	Hollenbeck	1-1544787660	7	CODE 75		Hollenbeck	PROACTIVE INSERT
4	5588 Alhambra Ave.	Lowell Ave	Hollenbeck	1-1522888951	8	CODE 75		Hollenbeck	PROACTIVE INSERT
<b>CARE Team 15 - Council District 15 - Call Sign CARE315</b>									
	<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>		<b>Address</b>	<b>Cross Street</b>	<b>Division</b>	<b>Comments</b>
1	IMPERIAL SECZ		SOUTHEAST	Special Enforcement and Cleaning Zone	5	CODE 75		SOUTHEAST	PROACTIVE INSERT
2	CODE 75		SOUTHEAST	PROACTIVE INSERT	6	CODE 75		SOUTHEAST	PROACTIVE INSERT
3	CODE 75		SOUTHEAST	PROACTIVE INSERT	7	CODE 75		SOUTHEAST	PROACTIVE INSERT
4	CODE 75		SOUTHEAST	PROACTIVE INSERT	8	CODE 75		SOUTHEAST	PROACTIVE INSERT



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Wednesday, February 19th @ 7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

CAZADOR CARE+1- Council District 13 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200106019	1934 GLENDALE BLVD, 90039	N ALLESANDRO ST	FARGO ST.	SIDEWALK/STREET	3 HE's, 12 Postings, tents, tarps, carts, bulky items, trash/debris.	2 hours	NORTHEAST	CARE124	Approved	
2	200108003	2121 AARON ST, 90026	GLENDALE BLVD	ALVARADO ST	SIDEWALK/STREET	5 HE's, 9 Postings, tents, tarps, trash, bulky items, carts.	2 hours	NORTHEAST	CARE124	Approved	
3	200116035	4798 PROSPECT AVE, 90027	EDGEMONT ST	VERMONT AVE	SIDEWALK/STREET	4 HE's, 12 Postings, tents, tarps, trash, bulky items, bikes, carts.	2 hours	NORTHEAST	CARE124	Approved	
4	200128014	4835 W SANTA MONICA BLVD, 90029	EDGEMONT ST.	HELIOTROPE	SIDEWALK/STREET	2 HE's, 12 Postings, tents, tarps, trash, bulky items, bikes, carts.	1 hours	NORTHEAST	CARE124	Approved	
DCT CARE+3- Council District 11 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200117008	321 S 4TH AVE, 90291	ROSE AVE	SUNSET AVE	SIDEWALK/STREET	13 HE's, 13 Postings, tarps, trash, carts, bikes, bulky items.	4-5 hours	PACIFIC	CARE425	Approved	
2	200131038	CENTINELA AVE AT PICO BLVD, 90064	10 FWY		SIDEWALK/STREET	4 HE's, tarps, trash/debris, bulky items, carts	2 hours	WEST LOS ANGELES	CARE425	Approved	DOT
WASHINGTON CARE+1 - Council District 10 Services :											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200122028	3425 W 15TH ST, 90019	4TH	5TH AVE	SIDEWALK/STREET	4+ HE's, 10 Postings, Shopping carts, bulky items, trash/debris, bikes/bike parts.	2-3 hours	WILSHIRE	CARE426	Approved	
2	191223005	636 S BERENDO ST, 90010	6TH ST.	WILSHIRE BLVD.	SIDEWALK/STREET	14+ HE's, 10 Postings, tents with bulky items, trash/debris, bikes/bike parts, attachments.	4-5 hours	OLYMPIC	CARE426	Approved	
DCT CARE+1 - Council District 6 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191210006	11501 TUXFORD ST, 91352	N SAN FERNANDO ROAD	TELFAR AVE.	SIDEWALK/STREET	9+ HE's, 10 Postings, RVs with carts, bulky items, trash/debris, bikes/bike parts.	1 hours	FOOTHILL	CARE227	Approved	
2	200210023	9005 N BRADLEY AVE, 91352	N BRADLEY AVE		SIDEWALK/STREET	7+ HE's, 10 Postings, RVs with carts, bulky items, trash/debris, bikes/bike parts.	2 hours	FOOTHILL	CARE227	Approved	
3	200211007	11201 W PENDELTON ST, 9	PEORIA ST	RANDALL ST	SIDEWALK/STREET	17+ HE's, 15 Postings, RVs with carts, bulky items, trash/debris, bikes/bike parts.	4 hours	FOOTHILL	CARE227	Approved	
4	191219010	7659 N SIMPSON AVE, 916	STAGG AVE		SIDEWALK/STREET	1 HE and 1 RV on Simpson Ave (in posting area), carts, bulky items, trash/debris, bikes/bike parts.	2 hours	FOOTHILL	CARE227	Approved	
CARE+ ABH Team: <b>SCHRADER A Bridge Home</b>											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191007002	ABH SCHRADER	W SUNSET BLVD		Sidewalk/Street	ABH SHRADER - keep open for 90 days	8 Hours	HOLLYWOOD	CARE428	Approved	
CARE+ ABH Team: <b>ST ANDREWS A Bridge Home</b>											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200103003	ABH ST ANDREWS [I]	ARLINGTON AVE	DENKER AVE	Sidewalk/Street	ABH ST. ANDREWS - keep open for 90 days <b>Request LAPD in-pocket</b>	8 Hours	77TH STREET	CARE329	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	Crocker St (3rd St and 7th St) Central (5th and 6th St) Industrial St (Kohler St and Central Ave)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up.  <b>Crocker St (3th St to 7th St)</b> 30 Postings, 85+ HE, Bulky item, Bikes, Mattresses, baskets, trash and debris. There were permanent signs on this block with start time at 6 A.M. DOT signs were also visible with No Parking from 6am to 4pm.  <b>Central (5th St to 6th St)</b> 15 Postings, 16 HE, Bulky item, baskets, trash and debris. There were at least one Permanent sign on each block with start time at 6 A.M. Note: Exceeded max hours at first location. Live wire exposed on public right of way.	10 hrs	CENTRAL	CARE121	Approved	DOT
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200110015 200110019	35th St	(Hope St to Grand Ave) (22nd St to 39th St)	(35th St to 39th St)	SIDEWALK/STREET	10 Postings; 5 HE, Trash and debris.	1 hours	NEWTON	CARE122	Approved	DOT
2		Broadway			SIDEWALK/STREET	30 Postings; 16 HE, Bulky item, trash and debris. Large HE's	6 HR	NEWTON	CARE122	Approved	DOT
3		Grand Ave			SIDEWALK/STREET	15 Postings; 2 HE, Bulky items, trash and debris.	1 hours	NEWTON	CARE122	Approved	DOT
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200116001	1601 GRIFFITH AVE, 90021	E 16TH ST			20 Postings; 16 HE's Bulky item, trash and debris, shopping carts, and mattresses.	8 Hours	NEWTON	CARE123	Approved	DOT

[1] Prior backup at location



CITY OF LOS ANGELES

# CARE

CLEANING AND RAPID ENGAGEMENT



**TENTATIVE SCHEDULE:**  
Thursday, February 20th @ 8:00 A.M.

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID - Illegal Dumping

**CARE Team 1 - Council District 1 - Call Sign CARE 101**

	Address	Cross Street	Division	Comments
1	Ave 43	110fwy	Hollenbeck	
2	CODE 75		Hollenbeck	PROACTIVE INSERT
3	CODE 75		Hollenbeck	PROACTIVE INSERT
4	CODE 75		Hollenbeck	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Hollenbeck	PROACTIVE INSERT
6	CODE 75		Hollenbeck	PROACTIVE INSERT
7	CODE 75		Hollenbeck	PROACTIVE INSERT
8	CODE 75		Hollenbeck	PROACTIVE INSERT

**CARE Team 2 - Council District 2 - Call Sign CARE 202**

	Address	Cross Street	Division	Comments
1	11428 Sherman Way	Sherman way b/w Vineland and Tujunga (Costco Business Center)	North Hollywood	
2	6920 Tujunga Ave		North Hollywood	
3	7111 Vineland Ave		North Hollywood	
4	11340 Sherman Way		North Hollywood	

	Address	Cross Street	Division	Comments
5	Hartland St/Tujunga		North Hollywood	
6	CODE 75		North Hollywood	PROACTIVE INSERT
7	CODE 75		North Hollywood	PROACTIVE INSERT
8	CODE 75		North Hollywood	PROACTIVE INSERT

**CARE Team 3 - Council District 3 - Call Sign CARE 203**

	Address	Cross Street	Division	Comments
1	5409 Reseda Blvd		West Valley	1-1556369801
2	CODE 75		West Valley	PROACTIVE INSERT
3	CODE 75		West Valley	PROACTIVE INSERT
4	CODE 75		West Valley	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		West Valley	PROACTIVE INSERT
6	CODE 75		West Valley	PROACTIVE INSERT
7	CODE 75		West Valley	PROACTIVE INSERT
8	CODE 75		West Valley	PROACTIVE INSERT

**CARE Team 4 - Council District 4 - Call Sign CARE 404**

	Address	Cross Street	Division	Comments
1	De Longpre Ave	Cherokee Ave	Hollywood	
2	Sunset Blvd	N. La Brea Ave	Hollywood	
3	Sunset Blvd	La Brea Ave	Hollywood	
4	Franklin Ave	Highland Ave	Hollywood	

	Address	Cross Street	Division	Comments
5	Willoughby	McCadden	Hollywood	
6	1000 N. McCadden Place	Romaine St	Hollywood	
7	7061 Fountain Ave	N La Brea Ave	Hollywood	
8	CODE 75		Hollywood	PROACTIVE INSERT

**CARE Team 5 - Council District 5 - Call Sign CARE 405**

	Address	Cross Street	Division	Comments
1	759 N Highland Ave	Waring	WILSHIRE	
2	859 N Highland Ave	Willoughby	WILSHIRE	
3	868 N La Cienega	Willoughby	WILSHIRE	
4	358 N. Detroit St.	Oakwood	WILSHIRE	

	Address	Cross Street	Division	Comments
5	431 S Fairfax	Colgate	WILSHIRE	
6	CODE 75		WILSHIRE	PROACTIVE INSERT
7	CODE 75		WILSHIRE	PROACTIVE INSERT
8	CODE 75		WILSHIRE	PROACTIVE INSERT

**CARE Team 6 - Council District 6 - Call Sign CARE 206**

	Address	Cross Street	Division	Comments
1	9009 San Fernando Rd.	Lankershim Blvd.	Foothill	
2	7811 Lankershim Blvd	Stagg St.	Foothill	
3	7667 Simpson Ave.	Cul-de-sac	Foothill	
4	7614 Lankershim Blvd.	Satcoy St.	Foothill	

	Address	Cross Street	Division	Comments
5	8330 Lankershim Blvd.	Tuxford St.	Foothill	
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

**CARE Team 7 - Council District 7 - Call Sign CARE 207**

	Address	Cross Street	Division	Comments
1	11100 STRANWOOD	SAN FERNANDO MISSION	Mission	1-1514139421
2	15335 Chatsworth St	Sepulveda Blvd.	Mission	
3	10715 Sepulveda Blvd.	Chatsworth St.	Mission	1-1544331311
4	15420 W Plummer St.	Sepulveda Blvd.	Mission	1-1547275921

	Address	Cross Street	Division	Comments
5	CODE 75		Mission	PROACTIVE INSERT
6	CODE 75		Mission	PROACTIVE INSERT
7	CODE 75		Mission	PROACTIVE INSERT
8	CODE 75		Mission	PROACTIVE INSERT

**CARE Team 8 - Council District 8 - Call Sign CARE 308**

	Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone
2	141 W 89TH ST, 90003	Between MAIN ST and BROADWAY	SE	1-1491509731
3	9227 S WESTERN AVE, 90047	Between 92ND ST and 94TH ST	SE	1-1491552561
4	354 E 95TH ST, 90003	Between SAN PEDRO ST and TOWNE AVE	SE	1-1494220341

	Address	Cross Street	Division	Comments
5	8834 S MENLO AVE, 90044	Between 88TH ST and 90TH ST	SE	1-1505100701
6	CODE 75		SE	PROACTIVE INSERT
7	CODE 75		SE	PROACTIVE INSERT
8	CODE 75		SE	PROACTIVE INSERT

**CARE Team 9 - Council District 9 - Call Sign CARE 109**

	Address	Cross Street	Division	Comments
1	336 W. 62nd St.	Grand and Broadway	NEWTON	
2	501 E. Vernon	Avalon	NEWTON	
3	722 W SLAUSON AVE, 90044	Between BONSALLO AVE and HOOVER ST	NEWTON	1-1548609274
4	643 E 22nd Street	Between San Pedro and Adair	Newton	

	Address	Cross Street	Division	Comments
5	CODE 75		Newton	PROACTIVE INSERT
6	CODE 75		Newton	PROACTIVE INSERT
7	CODE 75		Newton	PROACTIVE INSERT
8	CODE 75		Newton	PROACTIVE INSERT

**CARE Team 10 - Council District 10 - Call Sign CARE 416**

	Address	Cross Street	Division	Comments
1	1819 S Western	Manhattan Pl & 18th Street	Olympic	
2	1140 S LA BREA AVE, 90019	Between ORANGE DR and EDGEWOOD PL	Wilshire	1-1552181701
3	TREMAINE AVE AT SAN VICENTE BLV	N/A	Wilshire	1-1546655591
4	TYCAMORE AVE AT APPLE ST, 90016	N/A	Wilshire	1-1532908221

	Address	Cross Street	Division	Comments
5	CODE 75		Wilshire	PROACTIVE INSERT
6	CODE 75		Wilshire	PROACTIVE INSERT
7	CODE 75		Wilshire	PROACTIVE INSERT
8	CODE 75		Wilshire	PROACTIVE INSERT

**CARE Team 11 - Council District 11 - Call Sign CARE 411**

	Address	Cross Street	Division	Comments
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	Address	Cross Street	Division	Comments
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1	3840 Grand View Blvd	Pacific Ave.	Pacific	
2	3775 COLONIAL AVE	MCCUNE	Pacific	
3	960 E ROSE AVE, 90291	Between FREDERICK ST and Nothing	Pacific	1-1542338739
4	ROSE AVE AT COURTLAND ST, 90291	N/A	Pacific	1-1529745457

5	CODE 75		Pacific	PROACTIVE INSERT
6	CODE 75		Pacific	PROACTIVE INSERT
7	CODE 75		Pacific	PROACTIVE INSERT
8	CODE 75		Pacific	PROACTIVE INSERT

**CARE Team 12 - Council District 12 - Call Sign CARE 212**

	Address	Cross Street	Division	Comments
1	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
8	CODE 75		DEVONSHIRE	PROACTIVE INSERT

**CARE Team 13 - Council District 13 - Call Sign CARE 413**

	Address	Cross Street	Division	Comments
1	SCHRAMER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone
2	5703 Hollywood	Wilton Place	HOLLYWOOD	Auth: 200211010
3	5941 Hollywood		HOLLYWOOD	Auth: 200128004
4	1750 Bronson	Carlos	HOLLYWOOD	Auth: 200211003

	Address	Cross Street	Division	Comments
5	1487 El Centro	Sunset	HOLLYWOOD	Auth: 200211051
6	CODE 75		HOLLYWOOD	PROACTIVE INSERT
7	CODE 75		HOLLYWOOD	PROACTIVE INSERT
8	CODE 75		HOLLYWOOD	PROACTIVE INSERT

**CARE Team 14 - Council District 14 - Call Sign CARE 114**

	Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone
2	2900 W. Broadway	Under 2 Fwy Bridge	Northeast	1-1536131062
3	Marmion Way at Figueroa Street	Figueroa Street	Northeast	1-1535589891
4	6251 York Blvd	N Ave 63	Northeast	1-1545086671

	Address	Cross Street	Division	Comments
5	7474 N. Figueroa St	Colorado Boulevard	Northeast	1-1516606841
6	CODE 75		Northeast	PROACTIVE INSERT
7	CODE 75		Northeast	PROACTIVE INSERT
8	CODE 75		Northeast	PROACTIVE INSERT

**CARE Team 15 - Council District 15 - Call Sign CARE 315**

	Address	Cross Street	Division	Comments
1	CARE PLUS			
2				
3				
4				

	Address	Cross Street	Division	Comments
5				
6				
7				
8				

**CARE Team River - Call Sign CARE 117**

	Address	Cross Street	Division	Comments
1				
2				
3				

	Address	Cross Street	Division	Comments
4				1-1423546642
5				
6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Thursday, February 20th @ 7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

WASHINGTON CARE+1 - Council District 9 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200210001	LONG BEACH AVE EAST AT 24TH ST, 90058	LONG BEACH AVE.	ALAMEDA ST.	SIDEWALK/STREET	10 Postings; 1 HE	NO ESTIMATE GIVEN	NEWTON	CARE 118	Approved	
2	200213022	120 E 33RD ST, 90011	S MAIN ST	DEAD END	SIDEWALK/STREET	15 Postings; 4 HE	NO ESTIMATE GIVEN	NEWTON	CARE 118	Approved	
DCT CARE+3- Council District 5 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200213042	304 N ORLANDO AVE, 90048	BEVERLY BLVD		SIDEWALK/STREET	21 Postings; 2 HEs, 1 attachment and 2 IDs	1 hour	WILSHIRE	CARE 419	Approved	
2	200213043	323 N ALFRED ST, 90048	BEVERLY BLVD		SIDEWALK/STREET	16 Postings; 3 HEs and 2 IDs	0.5 hour	WILSHIRE	CARE 419	Approved	
3	191224009	633 N LA BREA AVE, 90036	MELROSE AVE	CLINTON ST	ALLEY	17 Postings; 1 HE and 1 ID	0.5 hour	WILSHIRE	CARE 419	Approved	
4	200113011	3735 S DURANGO AVE, 90034	EXPOSITION DR		SIDEWALK/STREET	20 Postings; 14 HEs	6 hours	PACIFIC	CARE 419	Approved	
DCT CARE+1 - Council District 6 Services :											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200203010	6001 VAN NUYS BLVD, 91401	OXNARD	DELANO ST	SIDEWALK/STREET	12 HEs, 1 illegal dump, 20 postings	4 hours	VAN NUYS	CARE 221	Approved	
2	200210012	14258 W AETNA ST, 91401	HAZELTINE	TYRONE AVE	SIDEWALK/STREET	6 HE's, 4 illegal dumps , 18 Postings.	2.5 hours	VAN NUYS	CARE 221	Approved	
3	200117005	14165 W BESSEMER ST, 91401	HAZELTINE	TYRONE	SIDEWALK/STREET	6 HE's, 3 illegal dumps , 18 Postings.	3 hours	VAN NUYS	CARE 221	Approved	
4	200127001	14611 W BESSEMER ST, 91411	CEDROS AVE.	VESPER AVE	SIDEWALK/STREET	11 HE's, 1 illegal dumps , 18 Postings.	2.5 hours	VAN NUYS	CARE 221	Approved	
HARBOR CARE+1 - Council District 15 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200114014	729 S PALOS VERDES ST, 90733	S BEACON ST	CENTRAL	SIDEWALK/STREET	15+ HE's, 25 Postings, Tents, tarps, bulky items, bikes, bike parts, large amount of trash and debris.	NO ESTIMATE GIVEN	HARBOR	CARE 322	Authorized	
2	200114013	825 S BEACON ST, 90731	BEACON	CENTRAL	SIDEWALK/STREET	15+HE's, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	NO ESTIMATE GIVEN	HARBOR	CARE 322	Authorized	
3	200114010	921 S BEACON ST, 90731	S CENTER ST	BEACON	SIDEWALK/STREET	15+HE's, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts.	NO ESTIMATE GIVEN	HARBOR	CARE 322	Authorized	
EAST VALLEY CARE+1- Council District 2 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191205001	10712 W RAINIER ST, 91352	N Clybourn Ave		SIDEWALK/STREET	5 HEs present. Large piles of trash and debris, hazards observed while surveying locations.	3 hours	FOOTHILL	CARE 223	Approved	
2	190314017	12567 W STRATHERN ST, 91352	DAHA PL	WHITSETT AVE.	SIDEWALK/STREET	2 HEs Bulky items, shopping carts, and health hazards observed.	1 hour	FOOTHILL	CARE 223	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	Stanford Ave (4th St and 7th St) Gladys Ave (4th St and 7th St)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up.  Stanford Ave (4 th St and 7 th St) 20+ HE. Bulky items, trash & debris, 12 postings  Gladys Ave (4 th St and 7 th St) 20+ HE. Bulky items, trash & debris, 12 postings	8 hours	CENTRAL	CARE 124	Approved	
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200130026 200113015	Grand Ave	(Florence Ave to 59th Pl) (Flower St to Grand Ave) (Flower St to Grand Ave)		SIDEWALK/STREET	10+ HEs, 30 Postings	8 HRs	77TH STREET	CARE 325	Approved	
2		59th Pl			SIDEWALK/STREET	0 HEs, 0 Postings, exceeded allotted time	0 HRs	77TH STREET	CARE 325	Approved	
3		43rd St			SIDEWALK/STREET	0 HEs, 0 Postings exceeded allotted time	0 HRs	NEWTON	CARE 325	Approved	
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200113017	1811 PALOMA ST, 90021	WASHINGTON BLVD	18TH ST.	SIDEWALK/STREET	6 HEs, 12 postings	7 hrs	NEWTON	CARE 326	Approved	



CITY OF LOS ANGELES

# CARE

CLEANING AND RAPID ENGAGEMENT



**TENTATIVE SCHEDULE:**  
Friday, February 21st @ 8:00 A.M.

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID - Illegal Dumping

**CARE Team 1 - Council District 1 - Call Sign CARE101**

	Address	Cross Street	Division	Comments
1	CODE 75		RANPART	PROACTIVE INSERT
2	CODE 75		RANPART	PROACTIVE INSERT
3	CODE 75		RANPART	PROACTIVE INSERT
4	CODE 75		RANPART	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		RANPART	PROACTIVE INSERT
6	CODE 75		RANPART	PROACTIVE INSERT
7	CODE 75		RANPART	PROACTIVE INSERT
8	CODE 75		RANPART	PROACTIVE INSERT

**CARE Team 2 - Council District 2 - Call Sign CARE202**

	Address	Cross Street	Division	Comments
1	MOORPARK/170 underpass		North Hollywood	
2	Whitsett/Sherman Way near 170 on	It is City Property	North Hollywood	
3	12300 Sylvan St.	needs LAHSA outreach/CARE	North Hollywood	
4	13499 Saticoy		North Hollywood	

	Address	Cross Street	Division	Comments
5	Lankershim blvd & Sherman Way		North Hollywood	
6	12082 Vose St.	Laurel Canyon and Vose st.	North Hollywood	
7	CODE 75		North Hollywood	PROACTIVE INSERT
8	CODE 75		North Hollywood	PROACTIVE INSERT

**CARE Team 3 - Council District 3 - Call Sign CARE203**

	Address	Cross Street	Division	Comments
1	5409 Reseda Blvd		West Valley	1-1556369801
2	Burbank and Etiwanda Tunnel		West Valley	1-1556381331
3	Owensmouth Ave and Erwin	Owensmouth	Topanga	1-1556285511
4	CODE 75		Topanga	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Topanga	PROACTIVE INSERT
6	CODE 75		Topanga	PROACTIVE INSERT
7	CODE 75		Topanga	PROACTIVE INSERT
8	CODE 75		Topanga	PROACTIVE INSERT

**CARE Team 4 - Council District 4 - Call Sign CARE404**

	Address	Cross Street	Division	Comments
1	N. Highland Ave	Willoughby	Wilshire	
2	N Highland ave	Warring Ave	Wilshire	
3	654 Detroit St	Wilshire Blvd	Wilshire	
4	CODE 75		Wilshire	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		Wilshire	PROACTIVE INSERT
6	CODE 75		Wilshire	PROACTIVE INSERT
7	CODE 75		Wilshire	PROACTIVE INSERT
8	CODE 75		Wilshire	PROACTIVE INSERT

**CARE Team 5 - Council District 5 - Call Sign CARE405**

	Address	Cross Street	Division	Comments
1	8066 Beverly Blvd	Crescent Heights	WILSHIRE	
2	759 N Highland Ave	Waring	WILSHIRE	
3	600 N Detroit St	Clinton	WILSHIRE	
4	330 N Hayworth Ave	Beverly	WILSHIRE	

	Address	Cross Street	Division	Comments
5	431 S Fairfax	Colgate	WILSHIRE	
6	CODE 75		Wilshire	PROACTIVE INSERT
7	CODE 75		Wilshire	PROACTIVE INSERT
8	CODE 75		Wilshire	PROACTIVE INSERT

**CARE Team 6 - Council District 6 - Call Sign CARE206**

	Address	Cross Street	Division	Comments
1	14540 Sylvan St	Vesper Ave	Van Nuys	CARE HYBRID REQUESTED. REQUIRES POSTING.
2	14623 Sylvan St	Vesper Ave	Van Nuys	CARE HYBRID REQUESTED. REQUIRES POSTING.
3	14333 Bessemer St	Tyrone Ave/Sylmar Ave	Van Nuys	
4	6420 Sylmar Ave	Gilmore St	Van Nuys	

	Address	Cross Street	Division	Comments
5	14402 Gilmore St	Sylmar Ave	Van Nuys	
6	CODE 75		Van Nuys	PROACTIVE INSERT
7	CODE 75		Van Nuys	PROACTIVE INSERT
8	CODE 75		Van Nuys	PROACTIVE INSERT

**CARE Team 7 - Council District 7 - Call Sign CARE207**

	Address	Cross Street	Division	Comments
1	Bradley @ 118 Fwy	Paxton	Foothill	
2	El Dorado	Paxton	Foothill	1-1553938271
3	9800 Laurel Canyon Blvd		Foothill	1-1554141481
4	9070 Sunland Blvd	La Tuna Canyon Rd.	Foothill	1-1542562040

	Address	Cross Street	Division	Comments
5	8800 FOOTHILL BLVD		Foothill	1-1516592381 1-1514873269 1-1509087484
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

**CARE Team 8 - Council District 8 - Call Sign CARE308**

	Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone
2	1111 W MARTIN LUTHER KING, JR BL	N/A	SOUTHWEST	1-1506054471
3	2814 S HARVARD BLVD, 90018	Between 27TH ST and 29TH ST	SOUTHWEST	1-1550286991
4	3821 S HARVARD BLVD, 90062	Between Nothing and 38TH PL	SOUTHWEST	1-1503600147

	Address	Cross Street	Division	Comments
5	2729 S VAN BUREN PL, 90007	Between Nothing and D/E	SOUTHWEST	1-1511282399
6	CODE 75		SOUTHWEST	PROACTIVE INSERT
7	CODE 75		SOUTHWEST	PROACTIVE INSERT
8	CODE 75		SOUTHWEST	PROACTIVE INSERT

**CARE Team 9 - Council District 9 - Call Sign CARE309**

	Address	Cross Street	Division	Comments
1	45th and Vermont	N/A	77TH ST	1-1548389661
2	41st Place and Figueroa	N/A	Southwest	
3	850 W 60TH ST, 90044	Between HOOVER ST and MENLO AVE	77TH ST	1-1547770611
4	CODE 75		77TH ST	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		77TH ST	PROACTIVE INSERT
6	CODE 75		77TH ST	PROACTIVE INSERT
7	CODE 75		77TH ST	PROACTIVE INSERT
8	CODE 75		77TH ST	PROACTIVE INSERT

**CARE Team 10 - Council District 10 - Call Sign CARE316**

	Address	Cross Street	Division	Comments
1	5350 W ADAMS BLVD, 90016	Between DUNSMUIR AVE and BURNSIDE AVE	Southwest	1-1552533181
2	2867 S EDGEHILL DR, 90018	Between MONT CLAIR ST and 29TH ST	Southwest	1-1511775841
3	2715 S CLOVERDALE AVE, 90016	Between WESTHAVEN ST and ROSELAND ST	Southwest	1-1552532741
4	5409 W WESTHAVEN ST, 90016	Between BURNSIDE AVE and RIDGELEY DR	Southwest	1-1552536461

	Address	Cross Street	Division	Comments
5	CODE 75		SOUTHWEST	PROACTIVE INSERT
6	CODE 75		SOUTHWEST	PROACTIVE INSERT
7	CODE 75		SOUTHWEST	PROACTIVE INSERT
8	CODE 75		SOUTHWEST	PROACTIVE INSERT

CARE Team 11 - Council District 11 - Call Sign CARE411									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	3840 Grand View Blvd	Pacific Ave.	Pacific		5	CODE 75		Pacific	PROACTIVE INSERT
2	1044 E HARRISON AVE, 90291	Between VAN BUREN AVE and LINCOLN BLVD	Pacific	1-1530353131	6	CODE 75		Pacific	PROACTIVE INSERT
3	S. VENICE BLVD & OCEAN		PACIFIC	UHRC REQUEST	7	CODE 75		Pacific	PROACTIVE INSERT
4	CODE 75		Pacific	PROACTIVE INSERT	8	CODE 75		Pacific	PROACTIVE INSERT
CARE Team 12 - Council District 12 - Call Sign CARE212									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	CODE 75		DEVONSHIRE	PROACTIVE INSERT	5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	CODE 75		DEVONSHIRE	PROACTIVE INSERT	6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	CODE 75		DEVONSHIRE	PROACTIVE INSERT	7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4	CODE 75		DEVONSHIRE	PROACTIVE INSERT	8	CODE 75		DEVONSHIRE	PROACTIVE INSERT
CARE Team 13 - Council District 13 - Call Sign CARE413/113									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	SCHRAMER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone	5	117 N VENDOME ST, 90026		RAMPART	
2	Virgil	Lockwood	RAMPART		6	2699 block south side of Sunset Blvd.	Benton Way & Occidental Blvd.	RAMPART	
3	123 S Alvarado St		RAMPART		7	CODE 75		RAMPART	PROACTIVE INSERT
4	Mountain View	Beverly	RAMPART		8	CODE 75		RAMPART	PROACTIVE INSERT
CARE Team 14 - Council District 14 - Call Sign CARE114									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone	5	2203 E 1st St	N Chicago St	Hollenbeck	1-1525393911
2	3140 E. Olympic St	S Grande Vista Ave	Hollenbeck	1-1537341491	6	CODE 75		Hollenbeck	PROACTIVE INSERT
3	1051 Kingston Ave	N State St	Hollenbeck	1-1533646941	7	CODE 75		Hollenbeck	PROACTIVE INSERT
4	Velasco St	15th St	Hollenbeck	1-1525108641	8	CODE 75		Hollenbeck	PROACTIVE INSERT
CARE Team 15 - Council District 15 - Call Sign CARE315									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	CARE PLUS				5				
2					6				
3					7				
4					8				
CARE Team River - Call Sign CARE									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1					4				1-1423546642
2					5				
3					6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Friday, February 21st @ 7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

WASHINGTON CARE+1- Council District 14 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200213045	5185 E HUNTINGTON DR NORTH, 90032	VAN HORNE AVE	LIFUR AVE	SIDEWALK/STREET	15 Postings; 7 HE	NO ESTIMATE GIVEN	HOLLENBECK	CARE124	Approved	
2	200213040	4TH ST AT GOLDEN STATE FRWY, 90033	STATE ST	ST LOUIS ST	SIDEWALK/STREET	20 Postings; 1 HE.	NO ESTIMATE GIVEN	HOLLENBECK	CARE124	Approved	DOT
3	200213041	103 S MYERS ST, 90033	1ST ST	MONO ST	SIDEWALK/STREET	9 Postings; 5 HE	NO ESTIMATE GIVEN	HOLLENBECK	CARE124	Approved	
EAST VALLEY CARE+1- Council District 7 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	1-1551099321	14561 W MACLAY ST, 91345			SIDEWALK/STREET					Illegal Dump	
2	1-1553489961	13200 N BROMONT AVE, 91342			SIDEWALK/STREET					Illegal Dump	
3	1-1555137231	13190 N BROMONT AVE, 91342			SIDEWALK/STREET					Illegal Dump	
4	1-155386821	13166 W FILMORE ST, 91331			SIDEWALK/STREET					Illegal Dump	
DCT CARE+1 - Council District 12 Services :											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200127005	SATICOY ST AT RESEDA BLVD, 91335	RESEDA BLVD.	BRAID AVE	SIDEWALK/STREET	2 HE(s)	1 hour(s)	WEST VALLEY	CARE225	Approved	
CAZADOR CARE+1- Council District 13 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	190917004	952 N HARVARD BLVD, 90029	ROMAINE ST.	DEAD END	SIDEWALK/STREET	3 HE's present. Observed bulky items: sofas, wood pallets, dresser. Illegal dump located on Romaine St. refrigerator and bulky items.	3 hour	HOLLYWOOD	CARE426	Approved	
2	200218002	6227 W LA MIRADA AVE, 90038	VINE ST.	EL CENTRO AVE.	SIDEWALK/STREET	4 HE's present in tents on sidewalk. Minimal personal property, excess bicycles blocking sidewalk	2 hours	HOLLYWOOD	CARE426	Approved	
3	200218039	1204 N VINE ST, 90038	LEXINGTON AVE.	LA MIRADA AVE	SIDEWALK/STREET	3 HE's present on Lexington St near Vine St. Minimal personal property.	2 hour	HOLLYWOOD	CARE426	Approved	
HARBOR CARE+1- Council District 15 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200121012	11317 S AVALON BLVD, 90061	113TH ST	115TH ST	SIDEWALK/STREET	5 HE's, 15 Postings. Tents, tarps, bulky items, bikes, bike parts, trash and debris. *NOTE - Blacktop is city property as per Navigate LA.	1.5 hours	SOUTHEAST	CARE327	Approved	
2	200109001	11129 S CENTRAL AVE, 90059	E 112th St		ALLEY	6+ HE's, tent/tarps, carts, bulky items, trash/debris, bikes/bike parts. Bulky Item Structures (posted)	8.0 hours	SOUTHEAST	CARE327	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	Towne Ave (7th St and 8th St) Stanford Ave (7th St and 8th St) Gladys Ave (7th St and 8th St) Ceres Ave (7th St and 8th St)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up.  Towne Ave (7th St and 8th St) 10 Postings; 10 HE. Bulky items, trash and debris. Mobility is difficult.  Stanford Ave (7th St and 8th St) 10 Postings; 10 HE. Bulky items, trash and debris. Mobility is difficult.  Gladys Ave (7th St and 8th St) 10 Postings; 0 HE. Trash and debris. Pressure wash the location.  Ceres Ave (7th St and 8th St) 10 Postings; 7 HE. Bulky items, trash and debris. Mobility is difficult.  Agatha St (Towne Ave and Gladys Ave) 10 Postings; 0 HE. Trash and debris. Mobility is difficult. PRESSURE WASH LOCATION	8.0 hours	CENTRAL		Approved	
CARE+ OHS VENICE Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191114001 191022006	OHS VENICE, 90291 OHS VENICE - 3RD AND ROSE			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATIONExpanded Skidrow Concentrated Clean up.  Venice Pier/Boardwalk, 90291 (Windward Blvd to Windward Ave.) 8 HE's - Additional trash piles, carts & bulky items  Venice Boardwalk, 90291 (Windward Ave to Sunset Court) 30+ HE's - Additional trash piles, bicycles, carts & bulky items. Bulky structure was posted near Horizon Ave. and Venice boardwalk.  Venice Boardwalk, 90291 (Sunset Court to Navy Court) 20+ HE's - Additional trash piles, bicycles, carts & bulky items.  3 rd Ave (Ross Ave to Sunset Ave) 30+ HE's - Additional trash piles, bicycles, carts & bulky items.	8.0 hours	CENTRAL	CARE121	Approved	DOT
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral

1	200114002 200121004 200113012	88th Pl	(Flower St to Grand Ave) (40th Pl to 41st St) (Florence Ave to 84th Pl)		SIDEWALK/STREET	3 HEs, 6 Postings	2 HRs	SOUTHEAST	CARE322	Approved	
2		Flower St			SIDEWALK/STREET	0 HEs, 0 Postings	0HRs	NEWTON	CARE322	Approved	
3		Grand Ave			SIDEWALK/STREET	2 HEs, 30 Postings	2 HRs	NEWTON	CARE322	Approved	

**CARE+ DTLA Team**

	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200116014	316 WINSTON ST, 90013	E 4TH ST	W 5TH ST	SIDEWALK/STREET	12 HE(s)	4 hr(s)	CENTRAL	CARE123	Approved	

TENTATIVE SCHEDULE:  
Monday, February 24th @ 8:00 A.M.

CLEANING AND RAPID ENGAGEMENT

Please contact your supervisor if you have any questions.  
\* HE - Homeless Encampments  
\* ID - Illegal Dumping

CARE Team 1 - Council District 1 - Call Sign CARE101

	Address	Cross Street	Division	Comments
1	CODE 75		RAMPART	PROACTIVE INSERT
2	CODE 75		RAMPART	PROACTIVE INSERT
3	CODE 75		RAMPART	PROACTIVE INSERT
4	CODE 75		RAMPART	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		RAMPART	PROACTIVE INSERT
6	CODE 75		RAMPART	PROACTIVE INSERT
7	CODE 75		RAMPART	PROACTIVE INSERT
8	CODE 75		RAMPART	PROACTIVE INSERT

CARE Team 2 - Council District 2 - Call Sign CARE202

	Address	Cross Street	Division	Comments
1	Coffax and Ventura	Under coffax street over LA RIVER	North Hollywood	
2	11924 Satcoy St	Storm channel	North Hollywood	
3	11921 Covello st.	Storm channel	North Hollywood	
4	Vanowen and Satsuma		North Hollywood	

	Address	Cross Street	Division	Comments
5	12601 Satcoy St.		North Hollywood	
6	CODE 75		North Hollywood	PROACTIVE INSERT
7	CODE 75		North Hollywood	PROACTIVE INSERT
8	CODE 75		North Hollywood	PROACTIVE INSERT

CARE Team 3 - Council District 3 - Call Sign CARE203

	Address	Cross Street	Division	Comments
1	CODE 75		WEST VALLEY	PROACTIVE INSERT
2	CODE 75		WEST VALLEY	PROACTIVE INSERT
3	CODE 75		WEST VALLEY	PROACTIVE INSERT
4	CODE 75		WEST VALLEY	PROACTIVE INSERT

	Address	Cross Street	Division	Comments
5	CODE 75		WEST VALLEY	PROACTIVE INSERT
6	CODE 75		WEST VALLEY	PROACTIVE INSERT
7	CODE 75		WEST VALLEY	PROACTIVE INSERT
8	CODE 75		WEST VALLEY	PROACTIVE INSERT

CARE Team 4 - Council District 4 - Call Sign CARE203

	Address	Cross Street	Division	Comments
1	Lankershim	134 FWY/north of Riverside Drive	North Hollywood	
2	Vineland Ave	134 FWY/ north of Riverside Drive	North Hollywood	
3	Moorpark St	Bellflower/ under 101 FWY	North Hollywood	
4	10200 Riverside Drive	Forman	North Hollywood	

	Address	Cross Street	Division	Comments
5	CODE 75		North Hollywood	PROACTIVE INSERT
6	CODE 75		North Hollywood	PROACTIVE INSERT
7	CODE 75		North Hollywood	PROACTIVE INSERT
8	CODE 75		North Hollywood	PROACTIVE INSERT

CARE Team 5 - Council District 5 - Call Sign CARE405

	Address	Cross Street	Division	Comments
1	Pico and Beverwill		WEST LA	1-1556427131
2	3416 S MANNING AVE	National	WEST LA	
3	1421 S Wooster St.	Pico	WEST LA	1-1558796011
4	GREENFIELD AVE AT PICO BLVD		WEST LA	1-1557337571

	Address	Cross Street	Division	Comments
5	Cashio and Robertson		WEST LA	
6	CODE 75		WEST LA	PROACTIVE INSERT
7	CODE 75		WEST LA	PROACTIVE INSERT
8	CODE 75		WEST LA	PROACTIVE INSERT

CARE Team 6 - Council District 6 - Call Sign CARE206

	Address	Cross Street	Division	Comments
1	14412 Victory Blvd	Located in the alley	Van Nuys	
2	7755 Aqueduct Ave	Stagg St.	West Valley	1-1537232181
3	Victory Blvd.	Gaviota Ave. (Bike Path)	West Valley	1-1556998181
4	Balboa Blvd.	Vanowen St.	West Valley	1-1557451181

	Address	Cross Street	Division	Comments
5	Sherman way	Woodley Ave.	West Valley	1-1529602678
6	CODE 75		West Valley	PROACTIVE INSERT
7	CODE 75		West Valley	PROACTIVE INSERT
8	CODE 75		West Valley	PROACTIVE INSERT

CARE Team 7 - Council District 7 - Call Sign CARE207

	Address	Cross Street	Division	Comments
1	Bradley	Del Sur St.	Foothill	1-1559783221
2	12612 Osborne St.	Ralston Ave.	Foothill	
3	10707 N El Dorado Ave	Van Nuys	Foothill	1-1547348601
4	Remick	Sunburst	Foothill	1-1500543646

	Address	Cross Street	Division	Comments
5	8901 Helen Ave.	Glenoaks Blvd.	Foothill	1-1559686421
6	CODE 75		Foothill	PROACTIVE INSERT
7	CODE 75		Foothill	PROACTIVE INSERT
8	CODE 75		Foothill	PROACTIVE INSERT

CARE Team 8 - Council District 8 - Call Sign CARE308

	Address	Cross Street	Division	Comments
1	ST. ANDREWS SECZ		77TH ST.	Special Enforcement and Cleaning Zone
2	606 E 107TH ST, 90002	Between AVALON BLVD and STANFORD AVE	SE	1-1494224085
3	147 W 112TH ST, 90061	Between MAIN ST and BROADWAY	SE	1-1493314381
4	252 W 113TH ST, 90061	Between MAIN ST and BROADWAY	SE	1-1495502301

	Address	Cross Street	Division	Comments
5	11500 S HOOVER ST, 90044	Between 115TH ST and Nothing	SE	1-1496413222
6	CODE 75		SE	PROACTIVE INSERT
7	CODE 75		SE	PROACTIVE INSERT
8	CODE 75		SE	PROACTIVE INSERT

CARE Team 9 - Council District 9 - Call Sign CARE109

	Address	Cross Street	Division	Comments
1	5413 Avalon	55th St	Newton	
2	25th and Long Beach	Nevin	Newton	
3	300 W. 45th St.	Broadway	Newton	
4	6900 Avalon		Newton	

	Address	Cross Street	Division	Comments
5	CODE 75		Newton	PROACTIVE INSERT
6	CODE 75		Newton	PROACTIVE INSERT
7	CODE 75		Newton	PROACTIVE INSERT
8	CODE 75		Newton	PROACTIVE INSERT

CARE Team 10 - Council District 10 - Call Sign CARE416

	Address	Cross Street	Division	Comments
1	5TH ST AT HARVARD BLVD, 90020	N/A	OLYMPIC	1-1527345811
2	146 N HARVARD BLVD, 90004	Between 1ST ST and BEVERLY BLVD	OLYMPIC	1-1552197438
3	BERENDO ST AT 4TH ST, 90020	N/A	OLYMPIC	1-1521896337
4	HOBART BLVD AT 6TH ST, 90005	N/A	OLYMPIC	1-1501760041

	Address	Cross Street	Division	Comments
5	CODE 75		OLYMPIC	PROACTIVE INSERT
6	CODE 75		OLYMPIC	PROACTIVE INSERT
7	CODE 75		OLYMPIC	PROACTIVE INSERT
8	CODE 75		OLYMPIC	PROACTIVE INSERT

CARE Team 11 - Council District 11 - Call Sign CARE411

	Address	Cross Street	Division	Comments
1	3840 Grand View Blvd	Pacific Ave.	Pacific	
2	3775 COLONIAL AVE	MCCUNE	Pacific	
3	1020 E ROSE AVE, 90291	Between COURTLAND ST and PENMAR AVE	Pacific	1-1532383133
4	ROSE AVE AT SUNSET AVE, 90291	N/A	Pacific	1-1533367119

	Address	Cross Street	Division	Comments
5	CODE 75		Pacific	PROACTIVE INSERT
6	CODE 75		Pacific	PROACTIVE INSERT
7	CODE 75		Pacific	PROACTIVE INSERT
8	CODE 75		Pacific	PROACTIVE INSERT

CARE Team 12 - Council District 12 - Call Sign CARE212

	Address	Cross Street	Division	Comments
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	Address	Cross Street	Division	Comments
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1	South side of San Jose Street next to the tennis courts by the Granada Hills Recreation Center.		DEVONSHIRE		5	CODE 75		DEVONSHIRE	PROACTIVE INSERT
2	Parthenia east of Reseda		DEVONSHIRE		6	CODE 75		DEVONSHIRE	PROACTIVE INSERT
3	Nordhoff Place (west of Corbin)		DEVONSHIRE		7	CODE 75		DEVONSHIRE	PROACTIVE INSERT
4			DEVONSHIRE		8	CODE 75		DEVONSHIRE	PROACTIVE INSERT
<b>CARE Team 13 - Council District 13 - Call Sign CARE413/113</b>									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	SCHRAMER SECZ		HOLLYWOOD	Special Enforcement and Cleaning Zone	5	3021 N ROSWELL ST	SAN FERNANDO ROAD	NORTHEAST	
2	3030 FLETCHER DRIVE	SAN FERNANDO ROAD	NORTHEAST		6	EDENHURST	COLORADO	NORTHEAST	
3	COUNCIL ST.	VERMONT AVE	NORTHEAST		7	ALGER	GOODWIN	NORTHEAST	
4	SUNSET BLVD	WATERLOO	NORTHEAST		8	CODE 75		NORTHEAST	PROACTIVE INSERT
<b>CARE Team 14 - Council District 14 - Call Sign CARE114</b>									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	EL PUEBLO SECZ		CENTRAL	Special Enforcement and Cleaning Zone	5	1213 S Compton Ave		Newton	
2	1017 E Olympic Blvd		Newton		6	CODE 75		Newton	PROACTIVE INSERT
3	720 E 15th St		Newton		7	CODE 75		Newton	PROACTIVE INSERT
4	2300 E 8th St	Mateo St	Newton		8	CODE 75		Newton	PROACTIVE INSERT
<b>CARE Team 15 - Council District 15 - Call Sign CARE315</b>									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1	516 W 140th Street	Figueroa to cul de sac	Harbor		5	CODE 75		Harbor	PROACTIVE INSERT
2	Figueroa Street	135th to Rosecrans	Harbor		6	CODE 75		Harbor	PROACTIVE INSERT
3	116th Place	Hoover	Harbor		7	CODE 75		Harbor	PROACTIVE INSERT
4	CODE 75		Harbor	PROACTIVE INSERT	8	CODE 75		Harbor	PROACTIVE INSERT
<b>CARE Team River - Call Sign CARE</b>									
	Address	Cross Street	Division	Comments		Address	Cross Street	Division	Comments
1					4				1-1423546642
2					5				
3					6				



CITY OF LOS ANGELES  
**CARE+**  
CLEANING AND RAPID ENGAGEMENT



TENTATIVE SCHEDULE:  
Monday, February 24th @ 7:00 A.M.

\* HE - Homeless Encampments  
\* ID- Illegal Dumping

EAST VALLEY CARE+1- Council District 2 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200218055	11451 HATTERAS ST, 91601	LANKERSHIM BLVD		SIDEWALK/STREET	All encampments in the alley. Shopping carts, bulky items and visible health hazards.	1 hr	NORTH HOLLYWOOD	CARE224	Approved	
2	200106005	4555 N LANKERSHIM BLVD, 91602	HORTENSE ST.	RIVERSIDE DR.	SIDEWALK/STREET	All encampments on the sidewalk. Shopping carts, bulky items and visible health hazards.	3 hrs	NORTH HOLLYWOOD	CARE224	Approved	
3	200127020	101 FWY AND LAUREL CANYON BLVD, 91607	Riverside Dr		SIDEWALK/STREET	Encampments located on the sidewalk. Shopping carts, bulky items and visible health hazards.	2 hrs	NORTH HOLLYWOOD	CARE224	Approved	
4	200115003	10835 W CHANDLER BLVD, 91601	W CHANDLER BLVD		SIDEWALK/STREET	Encampments located on the sidewalk. Shopping carts, bulky items and visible health hazards.	2 hrs	NORTH HOLLYWOOD	CARE224	Approved	
DCT CARE+1 - Council District 6 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200205003	14600 W TITUS ST, 91402	ROSCOE BLVD	LANARK ST	SIDEWALK/STREET	2 HE(s)	2 hrs	MISSION	CARE225	Approved	
2	200121010	8783 N PARTHENIA PL, 91343	SEPULVEDA BLVD	PARTHENIA ST	SIDEWALK/STREET	2 HE(s)	1.5 hour(s)	MISSION	CARE225	Approved	
4	190702001	9134 VAN NUYS BLVD, 91402	NORDHOFF STREET		SIDEWALK/STREET	1 HE(s)	1 hr	MISSION	CARE225	Approved	
CAZADOR CARE+1- Council District 1 Services :											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200204027	826 S CORONADO ST, 90057	W 8TH ST	W 9TH ST	SIDEWALK/STREET	4 HE's; 6 postings. <b>Requires 2 LAPD Units</b>	3 hours	RAMPART	CARE126	Approved	DOT
WASHINGTON CARE+1 - Council District 13 Services:											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200103005	3191 W 4TH ST, 90020	VERMONT	WESTMORELAND		30+ HE's; 16 postings.	5.5 hour	OLYMPIC	CARE427	Approved	DOT
2	190627007	245 N VERMONT AVE, 90004	BEVERLY BLVD.	COUNCIL ST.		4 HE's; 7 postings.	2.5 hours	OLYMPIC	CARE427	Approved	DOT
CARE+ ABH Team: SITE A Bridge Home											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	191210001	ABH IMPERIAL	E 112TH ST	COMPTON AVE	Sidewalk/Street		8 hrs	SOUTHEAST	CARE328	Approved	
CARE+ OHS Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200102027	Wall St (5th St and 8th St) San Julian St (5th St and 8th St) San Pedro St (7th St to 8th St)			SIDEWALK/STREET	PLEASE DO NOT CLOSE AUTHORIZATION Expanded Skidrow Concentrated Clean up.  Wall St Between 5 th and 8 th St, 19 HE's 19 postings, Bulky items, trash and debris.  San Julian St Between 5 th and 8th St, 30 HE's 21 postings, Bulky items, trash and debris.  San Pedro St Between 7 th and 8th St, No HE's found upon arrival, but the location was posted/ 14 postings. -0. 5 hour for power wash	8.0 hours	CENTRAL	CARE121	Approved	
CARE+ Grand Ave Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200109002 200109003	49th St	(Flower to Grand Ave) (Flower St to Grand Ave) (Flower St to Grand Ave) (Flower St to Grand Ave) (51st St to 52nd Pl)		SIDEWALK/STREET	6 Postings; 4 HEs.	2 HR	NEWTON	CARE322	Approved	
2		51st St			SIDEWALK/STREET	6 Postings; 8 HE	3 HRs	NEWTON	CARE322	Approved	
3		52nd Pl			SIDEWALK/STREET	6 Postings; 8 HE	3 HRs	NEWTON	CARE322	Approved	
4		54th St			SIDEWALK/STREET	0 Postings	0 hrs	NEWTON	CARE322	Approved	
5		Flower St			SIDEWALK/STREET	0 Postings	0 hrs	NEWTON	CARE322	Approved	
CARE+ DTLA Team											
	Auth#	Address	Cross St	Cross St	Location	Comments/Survey	Est. Clean Time	Division	LAPD Call Sign	Status	Inter-Agency Referral
1	200116020	1116 E 11TH ST, 90021	S CENTRAL AVE	STANFORD AVE	ALLEY	2 HEs, 16 Postings.	2 HR	NEWTON	CARE123	Approved	
2	200116021	1150 E 12TH ST, 90021	PALOMA ST	S CENTRAL AVE	SIDEWALK/STREET	2 HEs, 15 Postings.	2 HR	NEWTON	CARE123	Approved	
3	200116019	1154 E 10TH ST, 90021	E OLYMPIC	11TH ST	SIDEWALK/STREET	2 HEs, 16 Postings.	2 HR	NEWTON	CARE123	Approved	
4	200116018	1161 E 11TH ST, 90021	S CENTRAL AVE	E OLYMPIC	SIDEWALK/STREET	1 HEs, 12 Postings.	1 hr	NEWTON	CARE123	Approved	

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11 *Additional Attorneys on Next Page*

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

14 JANET GARCIA, GLADYS ZEPEDA,  
15 MIRIAM ZAMORA, ALI EL-BEY,  
16 PETER DIOCSON JR, MARQUIS  
17 ASHLEY, JAMES HAUGABROOK,  
18 individuals, KTOWN FOR ALL, an  
19 unincorporated association;  
20 ASSOCIATION FOR RESPONSIBLE  
21 AND EQUITABLE PUBLIC  
22 SPENDING, an unincorporated  
23 association

24 Plaintiff(s),

25 vs.

26 CITY OF LOS ANGELES, a municipal  
27 entity; DOES 1-7,

28 Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF MARQUIS  
ASHLEY**

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18 *Peter Diocson Jr., Marquis Ashley, Association for Responsible*  
19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF MARQUIS ASHLEY**

1  
2 1. My name is Marquis Ashley. I have personal knowledge of the  
3 facts contained in his declaration, and if called to testify, I could and would  
4 testify competently as to the truth of the facts in this declaration.

5 2. I am 29 years old and have lived in and around Harbor City for  
6 most of my life. I am currently homeless and have been homeless for years. I  
7 am creative and like to work with my hands. I used to go to welding school  
8 and hope to find a job and permanent housing.

9 3. During my spare time, I find discarded items and repurpose  
10 them into useful items to use on the street. For example, I had made carts to  
11 move my belongings. I constructed one cart out of the axle of a three-wheel  
12 bicycle and wheelchair wheels. A photo of that cart is attached as the first  
13 photo of Exhibit A.

14 4. I travel everywhere on my bicycle. The areas I have had to stay  
15 are far away from grocery stores, restaurants, and other places we need to go  
16 to survive. For example, the Lomita and McCoy encampment is in an  
17 industrial area. There are barely any shops, and it is hard to get to places I  
18 need to go on foot, so I rely on my bike. Last year, I stayed at the Lomita  
19 and McCoy encampment, but I recently have started pitching my tent on  
20 different streets. I use my bike to travel to Lomita and McCoy, where I still  
21 have a support system, friends, and people in the community who are  
22 helping me get back on my feet. I go there three to five times per week with  
23 my bicycle and cart.

24 5. I try to always have a cart for my bike, because it makes it  
25 possible for me to pick up groceries and supplies I need to survive. Without  
26 a cart, it is really hard to carry supplies to my encampment.

27 6. Carts are also really helpful during cleanups, because it makes  
28 it easier for us to move our belongings out of the cleanup area. Without the

1 carts, it is hard to pack up in the short amount of time they give us to move.  
2 And for some of my neighbors, they have disabilities, so carts are really  
3 important for them. I have used my carts to help my neighbors and friends  
4 move their belongings during a cleanup.

5 7. LA Sanitation workers from the City of Los Angeles will not let  
6 us have shopping carts from grocery stores and they have told me multiple  
7 times that it illegal to have a shopping cart form a store. So having my own  
8 cart that I can use to transport things is really important to me.

9 8. On May 21, 2019, I was staying at a large encampment on  
10 Lomita and McCoy in the Harbor City area of Los Angeles. That day, I was  
11 at the encampment when LA Sanitation conducted a cleanup. Before the  
12 cleanup, I did not see any signs indicating that they would conduct a  
13 cleanup.

14 9. When LA Sanitation arrived, sanitation workers and LAPD  
15 officers gave the residents of the encampment only a short window to pack  
16 up our belongings and move. A sanitation worker gave me a trash bag for  
17 my stuff, which I filled up with my tent and other items I need to survive. A  
18 sanitation worker then instructed me to leave the area with my belongings.

19 10. I packed up what I could fit in the trash bag and piled it onto  
20 my homemade cart. I also had another handmade cart in need of repairs,  
21 which I piled on top of my belongings. A true and correct copy of the  
22 photos of the carts and bedding is attached as Exhibit A. I did not take the  
23 photos, which I know was given to us by the City of Los Angeles, but I can  
24 attest that the photos are an accurate depiction of my carts on May 21, 2019.

25 11. As I was attempting to comply with LA Sanitation's  
26 instructions to remove my belongings from the area, a sanitation worker  
27 stopped me and told me that the carts and bedding were Bulky Items, and  
28 therefore I could not take them with me out of the cleanup area. I knew that

1 he was a sanitation worker because he was wearing a sanitation uniform. I  
2 was not given any explanation why the carts and bedding were considered  
3 Bulky Items and was not given any opportunity to challenge the Bulky Item  
4 determination.

5 12. I did not agree that my carts were “bulky,” and I relied on these  
6 carts to move my belongings. One LAPD officer at the cleanup informed me  
7 that if I did not want to go jail, I would have to hurry up and move from the  
8 area. Because I did not want to go to jail, I felt like I could not argue with  
9 the sanitation worker’s orders to surrender the carts and bedding. So I left  
10 the carts and bedding behind. I was not given any documentation  
11 whatsoever regarding my carts or bedding. They didn’t give me any  
12 documents explaining why they were taken or even that they were taken at  
13 all.

14 13. Without the carts to transport my belongings, I had to drag the  
15 rest of my belongings outside of the area that had been cordoned off by  
16 LAPD officers.

17 14. After LA Sanitation completed the cleanup and the LAPD  
18 officers removed the yellow caution tape, I dragged my belongings back to  
19 the area where the cleanup occurred, but my carts and bedding were  
20 nowhere to be found. Everything that was left behind when we were told to  
21 leave the area was gone.


22 15. I was really upset I had to leave my carts behind. I loved those  
23 carts. They were really helpful and I was proud that I could fix them up and  
24 make them useable.

25 16. Having the cart made it easier to live on the street, especially  
26 because we have all been pushed to stay in industrial areas so far away from  
27 resources and things we need to survive.

28 //

1           17. Right now, I have a cart that I can attach to my bike again. I  
2 use it to transport my belongings and my groceries. I have it when I go to  
3 Lomita and McCoy to meet with people, to get phone chargers from  
4 someone who helps out in the neighborhood, and to get food. Sanitation  
5 comes to this location a lot, and any time I have my cart, I worry that  
6 Sanitation will be there and will tell me my cart is a bulky item, and they  
7 will take it and throw it away again. A true and correct copy of a photo of this  
8 cart is attached as Exhibit B.

9           I declare under penalty of perjury that the foregoing is true and  
10 correct. Executed on the February 24, 2020 in Los Angeles, California

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13 **Marquis Ashley**  
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# EXHIBIT A

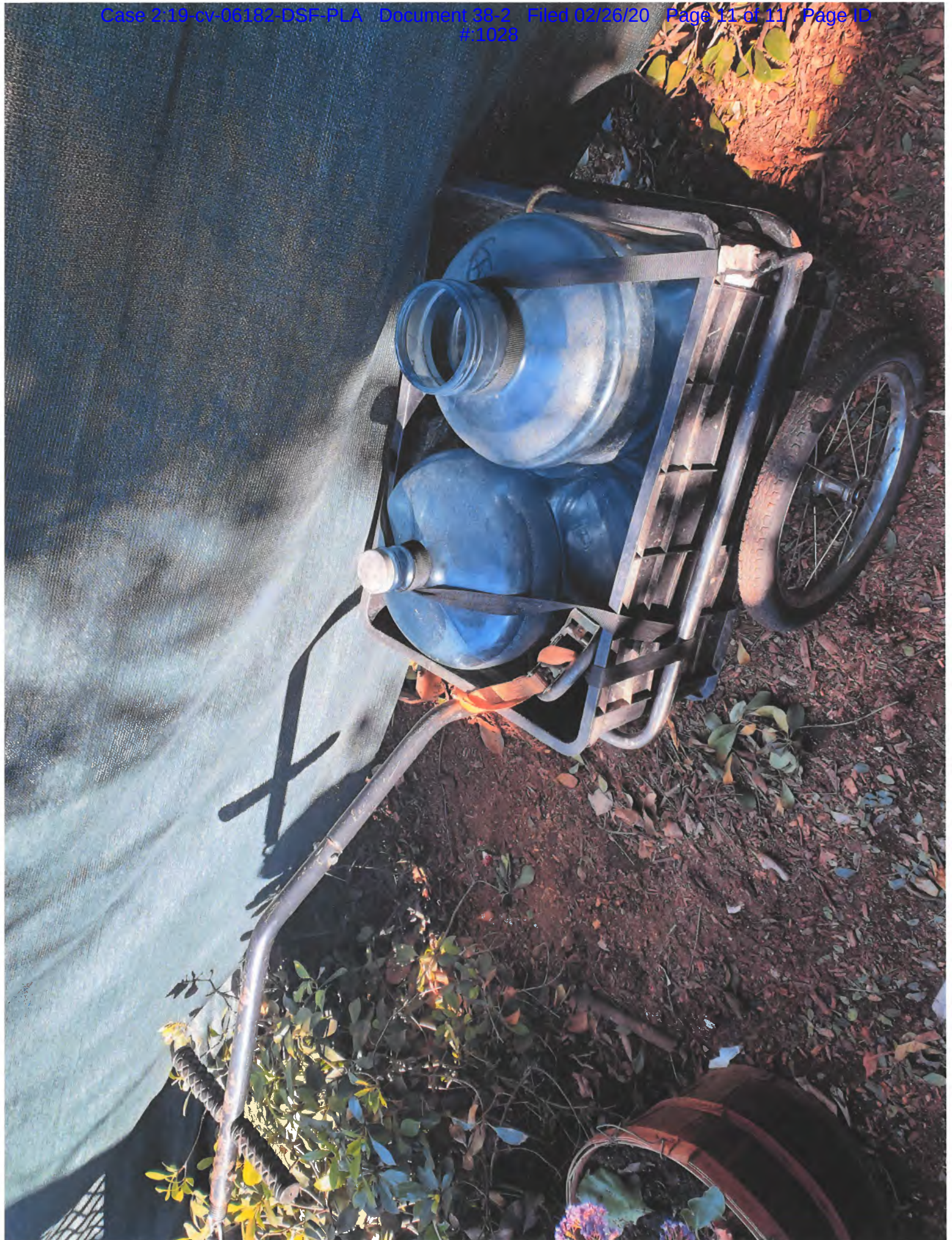


CTY001478



CTY001465

# EXHIBIT B



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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,  
Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF NICHOLAS  
PRICE**

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19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF NICHOLAS PRICE**

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2       1.     My name is Nicholas Price. I have personal knowledge of the  
3 facts contained in this declaration, and if called to testify, I could and would  
4 testify competently as to the truth of the facts in this declaration.

5       2.     I am the treasurer of Koreatown for All, one of the plaintiffs in  
6 this case. I have been in the organization since its formation.

7       3.     Around 10:00am on February 24, 2020, I was on my way to a  
8 meeting with three people to talk about the Bridge Home Shelter that was  
9 being built in the neighborhood. I got a call from a neighbor who lives in  
10 Koreatown and knows our work. He notified me that Sanitation was  
11 conducting a clean-up at 4th and Vermont that would impact one of the  
12 unhoused residents that our organization serves, Kahn. He resides on Shatto  
13 Place in between 4th Street and 6th Street. His shelter is typically set up on  
14 the grassy parkway between the sidewalk and the street.

15       4.     Kahn is in a wheelchair. He is one of the residents our  
16 organization serves. We have worked with him for as long as we have been  
17 formed.

18       5.     When we heard about the sweep, another Ktown for All  
19 member, Nic Emmons, and I immediately went to Shatto Place to assist  
20 Kahn. We arrived at Shatto Place around 10:15am. We met the three people  
21 I was supposed to meet, and instead of talking about the Bridge Home  
22 Shelter in Koreatown, we monitored the sweep.

23       6.     When we arrived at Shatto Place, Sanitation employees were  
24 conducting a cleanup on 4th Street, west of Shatto Place. Kahn and the  
25 person who called us started packing up Kahn's belongings to move them  
26 out of the way of the cleanup. When we got there, we began helping to pack  
27 up Kahn's belongings.

1           7.     About five minutes after we arrived at Shatto Place, two LAPD  
2 officers and around 6 or 7 Sanitation employees arrived on Shatto Place. I  
3 saw the name tags on the LAPD officers' uniforms, which identified the two  
4 of them as Officer Lucero and Officer Kim. The sanitation workers were  
5 wearing white with yellow reflective vests saying "CARE".

6           8.     When the sanitation workers arrived, they began picking up  
7 items that were still on the ground. Officer Lucero told us we needed to  
8 leave the area.

9           9.     The neighbor who called us asked the city workers for more  
10 time for Kahn to finish packing up his belongings but the LAPD officer said  
11 no. The neighbor then asked if he could move some of Kahn's items out of  
12 the area, and Nic asked if he could carry the pallets out of the area. The  
13 Sanitation workers said no, that Kahn's items were bulky items and they  
14 couldn't take them. The sanitation worker also told us that Kahn could take  
15 only what would fit within a 60 gallon trash bag.

16          10.    The other people at the cleanup also tried to convince the city  
17 workers to let Kahn take more of his belongings, but the LAPD officers told  
18 us to leave. I tried to explain that Kahn was in a wheelchair and he needed  
19 more time, but they would not give him more time. The sanitation worker  
20 told us again said that some of Kahn's belongings were bulky items that  
21 would not fit in a 60 gallon container. He pointed to the pallets and a foam  
22 cushion that Kahn uses to sleep on. The foam cushion was about 2 inches  
23 thick and covered in fabric. It was pliable. We had intended to roll it up and  
24 move it out of the way, but the sanitation worker told us that it was too large  
25 because it couldn't fit in the 60 gallon container, and that was the law.

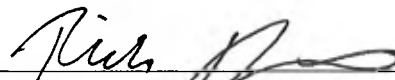
26          11.    Nic, who was videotaping the interaction, tried to reason with  
27 the sanitation worker to convince him to let Kahn keep some of his  
28 belongings. The sanitation workers would not let Kahn keep any of his

1 bulky items, but the sanitation worker then told us that we could pack up  
2 Kahn's smaller belongings in two coolers that Kahn had with him. While  
3 we were putting items into the coolers, Sanitation began throwing away the  
4 belongings that Sanitation identified as "bulky items," including the foam  
5 cushion and the three pallets that Kahn uses to keep himself off of the  
6 ground.

7 12. Officers Kim and Lucero again began demanding that we leave.  
8 We moved about ten feet away from the cleanup area. The sanitation  
9 workers threw away everything that was left in the area and then left.

10  
11 I declare under penalty of perjury that the foregoing is true and correct.

12  
13 Executed on February 24, 2020 in Los Angeles, California

14  
15   
16 Nicholas Price

Shayla Myers (SBN: 264054)  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,  
Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF NICOLAS  
EMMONS**

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18 *Peter Diocson Jr., Marquis Ashley, Association for Responsible*  
19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF NICOLAS EMMONS**

1  
2 1. My name is Nicolas Emmons. I have personal knowledge of the  
3 facts contained in this declaration, and if called to testify, I could and would  
4 testify competently as to the truth of the facts in this declaration.

5 2. I am a committee member and the outreach team lead of  
6 Koreatown for All, one of the plaintiffs in this case.

7 3. Around 10:15am on February 24, 2020, another Ktown for All  
8 member and I went to Shatto Place between 4<sup>th</sup> Street and 6<sup>th</sup> Street to assist  
9 a community member, Kahn, during a Sanitation cleanup.

10 4. Two police officers and 6 or 7 Sanitation employees arrived  
11 about five minutes after us. I took a video on my phone of our interactions  
12 with the police officers and Sanitation employees. Attached is a true and  
13 correct copy of the video that I took.

14  
15 I declare under penalty of perjury that the foregoing is true and correct.

16  
17 Executed on February 24, 2020 in Los Angeles, California

18  
19   
20 Nicolas Emmons

# **EXHIBIT A**

**[TO BE LODGED WITH THE COURT]**

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,

Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF PETE  
DIOCSON, JR.**

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17 *Attorneys for Plaintiffs Ktown for All, Ali El-Bey,*  
18 *Peter Diocson Jr., Marquis Ashley, Association for Responsible*  
19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF PETE DIOCSON, JR.**

1  
2 1. My name is Pete Diocson Jr. I have personal knowledge of the facts  
3 contained in this declaration, and if called to testify, I could and would testify  
4 competently as to the truth of the facts in this declaration.

5 2. I am 51 years old. I was born and raised in Carson, California. I am  
6 currently homeless and living in the Harbor City area of Los Angeles. I have lived in  
7 this area for the past four or five years.

8 3. Over the past few years, I stayed in the area around the Harbor City  
9 Greenway around Lomita Blvd. Along with many of my neighbors, I used to stay in  
10 the grassy area north of Lomita Blvd, which I understand is owned by the County of  
11 Los Angeles. I stayed there for four or five years with other people in the community.

12 4. In or around 2018, government workers told us we had to leave the  
13 public greenspace. They did not tell us where else we could go or provide us any  
14 shelter options, but they told us we were not allowed to stay in that area anymore.  
15 They fenced off the area and put up no trespassing sign to keep us out. After we were  
16 removed from the area, I moved with my neighbors to McCoy, which is a narrow  
17 street just west of Vermont Blvd. Many of us lived there for a couple of months, until  
18 we were forced to move again. This has happened every couple of months—they  
19 move us from one location, but do not tell us where we should go instead.

20 5. Currently, I stay around the Lomita and McCoy area in Harbor City.  
21 There are a lot of people who stay in the area. I know the people who stay in the area,  
22 and there are also a number of people in the community who come to the area to bring  
23 us food and help us out with the things we need to survive. Sometimes people also  
24 dump their trash in the area.

25 6. I stay in the area with my dog, Bella. I have had Bella for two and a half  
26 years. Bella is extremely important to me. She keeps me company. It's good to have  
27 someone, and I don't have anyone else.  
28

1           7.     In April 2019, I had a black wire kennel for Bella to sleep in. A housed  
2 neighbor who sometimes brings us things we need had met Bella and gave me the  
3 kennel. Having the kennel was great. It gave me peace of mind and made it possible  
4 to keep her with me while I was sleeping in my tent, because I was sure she would not  
5 run away or bother anyone on the block.

6           8.     On the morning of April 24, 2019, I was staying on Lomita and McCoy  
7 in Harbor City where I slept. That morning, police officers with the Los Angeles  
8 Police Department and workers driving a trash truck came to the area where we were  
9 all staying to do a sweep. I knew about the sweep because there were posted notices  
10 on the street, stating that a cleanup would happen. I have experienced these sweeps  
11 before, so I knew I needed to pack up my belongings and move them out of the way  
12 when they told us to move.

13          9.     Because I knew the sweep would be happening that morning and I  
14 needed to be able to pack up my belongings, I moved Bella out of the area so I could  
15 pack up my belongings without worrying about her.

16          10.    When the city workers and cops arrived that morning, I was already  
17 packing up my belongings to move them out of the way. I had packed up my tent, my  
18 clothes, and my other belongings, and stacked them on Bella's kennel.

19          11.    I was getting ready to move my belongings from the area when Officer  
20 Lopez came up to me. Officer Lopez is an officer with the Los Angeles Police  
21 Department. I know Officer Lopez because he frequently is in the area around where  
22 I stay.

23          12.    Officer Lopez told me that I could not take Bella's kennel with me. He  
24 told me that it was a bulky item and it was too big, so I wasn't allowed to keep it. I  
25 did not agree with him, but I did not want to challenge him. I am on probation, and I  
26 was afraid that if I argued with him, I would be arrested. I have seen other people  
27 arrested when they disagree with the police. If I got arrested, I was worried about  
28 what would happen to my belongings and to Bella. I left Bella's kennel behind and

1 moved the rest of my belongings out of the area. A true and correct copy of a photo of  
2 Bella's kennel is attached as Exhibit A.

3 13. After I left my kennel behind, I moved around the corner with rest of my  
4 neighbors and waited for the sanitation workers and police to finish cleaning. I have  
5 seen cleanups before, and I recognized the same type of trucks that LA Sanitation had  
6 used in previous cleanups. After they finished cleaning up the area, I went back to the  
7 location where I had left the kennel but it was no longer there.

8 14. After the kennel was taken, a neighbor gave me a new kennel for Bella.  
9 Attached as Exhibit B is a photo of Bella's second kennel. I was present when the  
10 photo was taken, and it is is a true and accurate representation of the new kennel.

11 15. After receiving this second kennel, I remained worried that this new  
12 kennel would also be taken and destroyed. I was right. In late 2019, during another  
13 clean up, LA Sanitation took my second kennel and destroyed it.

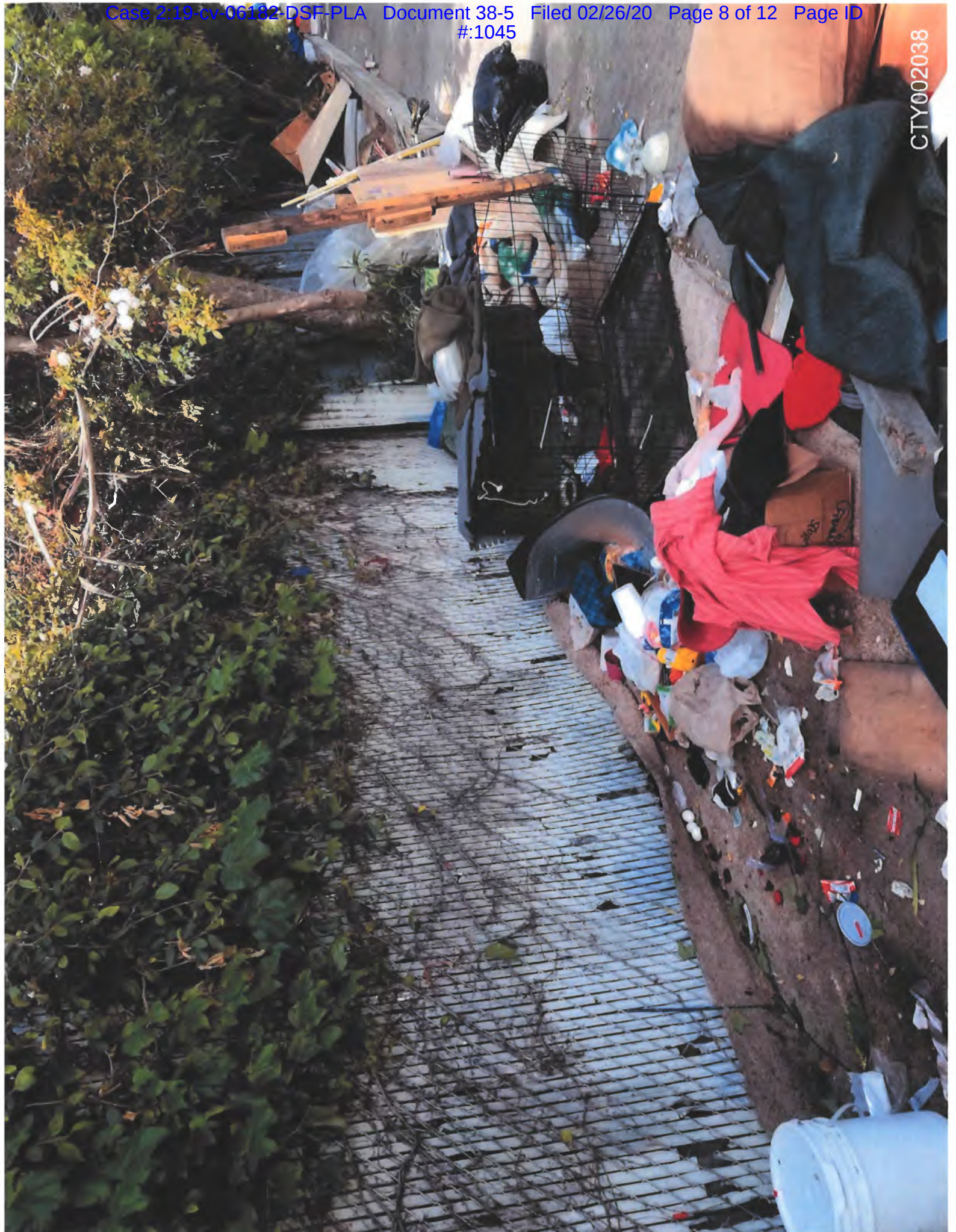
14 16. Since then, I have not wanted to try to get another kennel because the  
15 City keeps taking them and throwing them away, even though I don't think they are  
16 bulky items. The City throws away a lot of things, including a lot of items they say  
17 are bulky, even though I don't think are against the law. I have no way to challenge  
18 their decisions. I can't even really argue with them because I worry I will get arrested.

19 17. Right now, I have a bin that I use to store my belongings and to keep  
20 them dry. I worry that the City will consider this a bulky item. In the past, when city  
21 workers have come to my property, they have taken away bikes parts, bins the same  
22 size as this one, and other items about that size. When they have taken them away,  
23 they have told me they are bulky items and that's why they are taking them and  
24 throwing them away. A true and correct photo of these items is attached as Exhibit C.

25 18. When I do not have a kennel for Bella, I worry she will get loose during  
26 the night and run into traffic. It is hard for me to sleep because I did not have the  
27 peace of mind that Bella is secure. This makes my anxiety worse and the lack of sleep  
28 makes everything harder.



# EXHIBIT A



CTY002038

# EXHIBIT B



# EXHIBIT C



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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,  
Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF PHUONG  
NGUYEN**

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19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF PHUONG NGUYEN**

1  
2 1. My name is Phuong Nguyen, and I usually go by Jane Nguyen.  
3 I have personal knowledge of the facts contained in this declaration, and if  
4 called to testify, I could and would testify competently as to the truth of the  
5 facts in this declaration.

6 2. I am the co-founder and a core organizer of Ktown for All.

7 3. Ktown for All was founded in 2018 to support the construction  
8 of the Bridge Home shelter in Koreatown. The mission of Ktown for All is  
9 to support unhoused residents, to form connections between housed and  
10 unhoused residents of Koreatown, and to advocate for housing and shelters  
11 and other services in the Koreatown community.

12 4. We meet monthly with the general membership, and we have  
13 committees that meet every other week. We also meet with other service  
14 providers in the area such as churches and the Peer Resource Center. We  
15 send members to city council meetings and neighborhood council meetings,  
16 and we organize vigils and other types of community advocacy to advance  
17 our mission. It is integral to our mission to have unhoused persons included  
18 in our meetings and participating in advocacy. The organization also does  
19 outreach to unhoused neighbors every Saturday, except for the first Saturday  
20 of the month when we have our general meeting.

21 5. One unhoused member named Muhammad moved to a new  
22 location after a cleanup, which we call a sweep, by LA Sanitation. I used to  
23 see him at 6<sup>th</sup> and Ardmore regularly before he moved. The sweep happened  
24 in August. After he moved we did not connect with him again until  
25 November. I was present when the organization connected with him again  
26 during outreach, and he told us that he moved because of the sweep. After  
27 we connected with him again, he came to a general meeting of the  
28 organization. This is just one example, but there are other members we have

1 also lost contact with because they moved after the sweeps. I have  
2 personally been present on multiple occasions where members told us they  
3 had moved because of sweeps.

4 6. Monitoring of the sweeps in our neighborhood, and organizing  
5 replacements for people whose belongings have been taken, takes time and  
6 resources away from these other advocacy activities.

7 7. We are concerned about the well-being of our unhoused  
8 members and neighbors. It makes it harder for them to get into housing  
9 when they spend their time and resources to replace survival items. The fear  
10 of losing their items also keeps them from going to appointments and to our  
11 meetings. Monitoring the sweeps and replacing people's items is necessary  
12 to ensure that unhoused members can advocate for themselves, organize  
13 with us, and ultimately get into housing.

14 8. I had a meeting this morning at 10 AM about the Bridge Home  
15 Shelter with Nick Price and Nic Emmons, members of our organization, and  
16 representatives from United Way and a homeless service provider, about  
17 how we could best work to identify community members and help them go  
18 into the shelter. I was on my way to the meeting when I got a text that one  
19 of our unhoused neighbors needed help because of a clean up. Nick Price  
20 called me and told me that he had gotten a call from a neighbor and that they  
21 needed people to monitor the sweep. He, Nic, and the representative from  
22 United Way were all going to the clean up, and he said that we would meet  
23 afterward.

24 9. Instead of meeting at 10:00 AM as planned, we met around  
25 10:40 AM, after people finished helping our unhoused neighbor by  
26 monitoring the sweep and advocating for him against the property  
27 confiscation.

28

1           10. My organization spends a significant amount of time  
2 monitoring what is happening with the sweeps and advocating for our  
3 unhoused neighbors not to lose their property. Just as happened this  
4 morning, this time spent monitoring cuts into our time for meetings and  
5 organizing. We could be advocating in other ways if we did not have to  
6 monitor property destruction and spend time replacing people's property.

7           11. My organization has replaced people's property frequently. We  
8 often buy tents when they are taken by LA Sanitation. We also directly  
9 provide brooms, socks, sleeping bags, blankets, underwear, and warm  
10 clothes. Although we have not directly provided carts or crates, I do spend  
11 time in my capacity as an organizer for Ktown for All posting things that  
12 people lose on social media so that community members can buy and  
13 replace things for our unhoused neighbors. We have done that for a small  
14 cart and a cooler. People order the things to be delivered to a member's  
15 residence, and then that member takes them to the people on the street.  
16 There are three different members we have accepting deliveries, including  
17 co-founder Mike Dickerson.

18           12. I met an unhoused neighbor named Rachelle Bettega many  
19 months ago. After we had spoken several times, she told me that she wanted  
20 to be a member of Ktown for All. I have brought her in the past a tarp,  
21 blankets, wet wipes, clothes, socks, food, and resource sheets. The resource  
22 sheets are a list of food pantries and showers nearby that she can go to.

23           13. Rachelle told me that the sanitation workers will not let her  
24 keep bins. She told me that her clothes have gotten moldy and wet from  
25 rain. After she told me that, Ktown for All brought her more clothes. I was  
26 personally present along with another member when we brought her more  
27 clothes.  
28



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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,  
Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF RACHELLE  
BETTEGA**

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**DECLARATION OF RACHELLE BETTEGA**

I, RACHELLE BETTEGA, hereby declare and state as follows:

1. My name is Rachelle Bettega and I am 42 years old. I have been living in a tent at the corner of 6th and Harvard for about eight months. I have a job as an in-home caregiver but it does not pay enough for me to pay rent on an apartment. I recently got a second job working at the front desk of a local business and am hoping to save up enough money to find a place to live.

2. I am a member of Ktown for All. I met the people in Ktown for All when they came to my tent to talk to me. They have been coming around for months and bringing things like water, sleeping bags, and socks to the people who live in the area. I talked to one of the founders of Ktown for All, Jane, and told her that I wanted to be a member. They have encouraged and inspired me to speak up about my situation.

3. In the past four months, I have experienced two unnoticed sweeps where officers took my belongings, and two noticed sweeps where officers took my belongings. In my experience, whether the sweeps were noticed or unnoticed, the officers look for bulky items and take those bulky items.

4. I clean around my tent every day and make sure that the litter from the street that passersby throw is cleaned up. I want to keep the area looking neat so that the neighbors do not complain. I also just feel better when I can keep my home neat and tidy. I also make sure that my tent and my neighbors' tents are not blocking the sidewalk. There is plenty of room for people to pass by us without any inconvenience, and definitely more than three feet of room.

5. In the first unnoticed sweep, which happened sometime in the beginning of December, the sanitation workers let us move some things out of our tents and gave us fifteen minutes to do so. They asked us to lower our tents to the ground so that they could look for bulky items through the surface of the tent. The sanitation workers were men and they were wearing uniforms. In both of the unnoticed sweeps, some of them had the white hazmat suits on and some had vests on.

1 Usually the ones with the white suits on were the ones who talked to us. There  
2 were also police officers present, but they did not talk to us, and just observed what  
3 was happening.

4 6. I packed up my tent and lowered it. At the time I had just purchased a used  
5 bicycle in order to get to my job more easily. I was in the process of fixing the  
6 bicycle and one of the tires was off because we were putting new tires on it.  
7 Sanitation workers had previously told me that I was only allowed to have one  
8 bicycle, so that was the only bicycle I had. I had put one tire on the bicycle  
9 already, but had not put the second tire on. Since I only had one bicycle, I thought  
10 they would not take it.

11 7. After the fifteen minutes were up, the sanitation workers took the bicycle tire  
12 and the bicycle both. I was standing about twenty feet away, where they had asked  
13 me to move (just past the nearest tree) and objected to them taking my bicycle.  
14 The workers told me that because the tire was not on it I was not allowed to have  
15 it. They classified it as a bulky item.

16 8. From where I was standing at the tree, I watched them throw my bicycle into  
17 the trash truck. The compactor on the trash truck crunched and destroyed my  
18 bicycle in front of my eyes. It was devastating.

19 9. It had been raining in the past few days at that time. My neighbor is 62  
20 years old and I have personally observed that she has difficulty moving sometimes.  
21 She told me that she has sciatica. She had gotten some crates to make herself a bed  
22 so that she could stay off the wet ground. She pushed the crates together and  
23 covered them with cardboard. In that same sweep where my bicycle was crushed,  
24 the sanitation workers found and took all the crates, and threw them in the trash  
25 truck as well. They told us we are not allowed to have crates.

26 10. I like to keep my clothes and supplies in bins and crates so that they are not  
27 just on the ground. When clothes are just kept in plastic or cloth bags, in my  
28 experience, they get wet when it rains. Bags do not close as securely as bins.

1 11. The second unnoticed sweep I experienced was in the beginning of  
2 January. The sanitation workers made us take items out of the our tent again, and  
3 told me I had to stand behind the tree again. Once again, I was standing about  
4 twenty feet away and watched them go through my tent. They told us we were not  
5 allowed to have bins. Anything we have that holds our things, they take. I lost  
6 two phones that were in a bin when they threw out my bins. I also lost the clothes  
7 and cleaning supplies that were in the bins.

8 12. After they took my bins, I kept my remaining clothes in plastic bags. When  
9 it rained in January, my clothes got wet. Some members of K-town for All came  
10 by and gave me some new dry socks and underwear.

11 13. Right now, I have purchased a stackable plastic stand to keep my clothes  
12 in. It is about three feet high and about four feet wide. I am worried that if another  
13 unnoticed sweep occurs, the officers will take my stand.

14 I declare under penalty of perjury under the laws of the United States that  
15 the foregoing is true and correct.

16  
17 Executed on February 24, in Los Angeles, California.

18  
19   
20 RACHELLE BETTEGA

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Romy Ganschow (SBN: 320294)  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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MIRIAM ZAMORA, ALI EL-BEY,  
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entity; DOES 1-7,

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CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF SHAYLA  
MYERS**

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19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF SHAYLA MYERS**

1  
2 1. My name is Shayla Myers. I am counsel for Plaintiffs in this action and I  
3 am licensed to practice law. I have personal knowledge of the facts contained in this  
4 declaration, and if called to testify, I could and would testify competently as to the  
5 truth of the facts in this declaration.

6 2. In September 2018, the Legal Aid Foundation of Los Angeles and Law  
7 Offices of Schonbrun Seplow Harris and Hoffman LLP, representing a coalition of  
8 individuals and organizations, including Plaintiff Ktown for All, sent a letter to the  
9 Mayor of Los Angeles and the City Council, placing the City on notice about potential  
10 constitutional issues with Los Angeles Municipal Code Section 56.11 and requesting a  
11 meeting to address the organizations' concerns. A true and correct copy of the letter is  
12 attached as Exhibit A. Thereafter, the Coalition and lawyers met a number of times  
13 with city staff and representatives from the City Attorney's office.

14 3. On June 19, 2019, the Mayor of Los Angeles publicly announced a  
15 restructuring of the cleanup crews deployed to clean up homeless encampments,  
16 including the creation of new CARE and CARE+ teams to replace existing Clean  
17 Streets LA and HOPE teams. The new program was to launch at the beginning of  
18 October 2019. The deployment plan appeared to address some of the issues raised in  
19 the September 2018 letter. A copy of the Press Release related to the launch of the  
20 CARE Teams is attached as Exhibit 6 to Plaintiffs' Request for Judicial notice.

21 4. Thereafter, the City Council Committee on Energy, Climate Change, and  
22 Environmental Justice discussed the new deployment of City resources and the  
23 creation of the CARE and CARE+ teams. I was present at each of the meetings. At  
24 the Energy, Climate Change, and Environmental Justice Committee meeting on June  
25 25, 2019, the committee approved the request for \$6.5 million in additional funds for  
26 47 positions within LA Sanitation, to conduct cleanups as part of CARE and CARE+.  
27 A copy of the Index of the Council File related to these actions is attached to  
28 Plaintiffs' Request for Judicial Notice, Exhibit 5.

1           5.     On September 5, 2019, counsel for Plaintiffs and the City of Los Angeles  
2 met and conferred regarding the City's contemplated Motion to Dismiss. Counsel for  
3 Defendant informed Plaintiffs that the City intended to move to dismiss Plaintiffs'  
4 claims that the Bulky Item Provision is unconstitutional on its face.

5           6.     The roll-out of CARE and CARE+ occurred in October 2019.

6           7.     Approximately after two months of the launch of the new program,  
7 members of the City Energy, Climate Change and Environmental Justice Committee  
8 agenized a meeting to discuss the new program. I was present at that meeting and  
9 personally heard city council members ask if the CARE teams were being empowered  
10 to clean up or were handicapped by bureaucracy.

11          8.     On January 21, 2020, I attended a meeting of the Energy, Climate  
12 Change, and Environmental Justice Committee of the Los Angeles City Council. At  
13 the meeting, LA Sanitation were asked about a report they had submitted to council  
14 that week, stating that, as of that date, LA Sanitation would begin "fully enforcing Los  
15 Angeles Municipal Code Section 56.11," including the Bulky Item Provision. A true  
16 and correct copy of that report is attached to our Request for Judicial Notice as Exhibit  
17 2.

18          9.     Given the City's change in its enforcement posture, Plaintiffs considered  
19 moving for a preliminary injunction to prevent the enforcement of the Bulky Item  
20 Provision of LAMC 56.11, which Plaintiffs contend is unconstitutional on its face.  
21 However, on February 2, 2020, before Plaintiffs could do so, this Court issued an  
22 order, scheduling a hearing on Defendant's Motion to Dismiss (Dkt 34). Thereafter,  
23 in the interest of preserving judicial resources as well as city resources, Plaintiffs  
24 waited for a ruling on Defendant's motion to dismiss.

25          10.    On Saturday, February 15, 2020, this Court issued a ruling on  
26 Defendant's motion to dismiss, denying the motion as to Plaintiffs' facial challenge to  
27 LAMC 56.11(3)(i) and (10)(d) (Dkt 36). After reviewing the Court's ruling,  
28 Plaintiffs contacted counsel for the Defendant, requesting that the Defendant stipulate

1 to a preliminary injunction preventing the City of Los Angeles from enforcing  
2 Sections 56.11(3)(i) and 56.11(10)(d) of the Los Angeles Municipal Code. A true and  
3 correct copy of that letter, which I sent on February 18, 2020, is attached as Exhibit B.


4 11. On Wednesday, February 19, 2020, I spoke to counsel for the Defendant  
5 regarding our proposed stipulation. Counsel for the Defendant indicated that an email  
6 had been sent out regarding the continued enforcement of the Bulky Item Provision,  
7 but the City did not yet have a response to Plaintiffs' request. He told me he would  
8 have a response for us by Friday, February 21, 2020. I informed him that we were  
9 willing to hold off filing the Preliminary Injunction if the City did in fact stop  
10 enforcing the Bulky Item provision in the meantime, but that we were concerned that  
11 city schedules issued daily indicated that the provision was still being enforced.

12 12. On Friday, February 21, 2020, I emailed counsel for the Defendant to  
13 follow up regarding our proposed stipulation. A true and correct copy of that email is  
14 attached as Exhibit C.

15 13. On Friday, February 21, 2020, counsel for the Defendant responded and  
16 stated that they did not yet have a response for us regarding our proposed stipulation.  
17 They did not indicate when they would have a response. A true and correct copy of  
18 that email is attached as Exhibit D.

19 14. As of Wednesday, February 26, 2020, the City of Los Angeles has not  
20 agreed to cease enforcement of LAMC Sections 56.11(3)(i) and 56.11(10)(d) nor has  
21 the City contacted us to discuss a preliminary injunction.

22  
23 I declare under penalty of perjury that the foregoing is true and correct.  
24 Executed this 26 day of February, 2020 at Los Angeles, CA.

25  
26 

27 Shayla Myers  
28

# EXHIBIT A



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**VIA OVERNIGHT MAIL**  
**AND ELECTRONIC MAIL**

September 24, 2018

Hon. Mayor Eric Garcetti  
Office of the Mayor  
Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012

Re: Enforcement of Los Angeles Municipal Code Section 56.11 in Special Enforcement Zones

Dear Mayor Garcetti:

We represent a number of homeless individuals and a coalition of organizations that operate in the areas surrounding the proposed Bridge Home shelter sites. Over the past month, details have emerged about the plan of the City of Los Angeles (City) to implement Temporary Homeless Shelter Special Enforcement Zones (THS Zones) around the new Bridge Home shelters. The purpose of these zones is to gain acceptance of the new shelters from city residents who may be reluctant to embrace the opening of a temporary homeless shelter in their neighborhood.<sup>1</sup> In particular, we understand that, as part of this strategy, the City will strictly enforce Los Angeles Municipal Code Section 56.11 (LAMC 56.11), a criminal ordinance that regulates the amount and type of belongings an individual who is homeless may have in public.<sup>2</sup> We agree with the many voices that have come out against this plan

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<sup>1</sup> See LAMC 56.11 Standard Operating Protocols, Protocol No. 12, Effective 8/3/2018.

<sup>2</sup> *Id.* We appreciate the Mayor's clarification that this plan does not include the overnight enforcement of Los Angeles Municipal Code Section 41.18(d) and that, consistent with Los Angeles Municipal Code Section 56.11, individuals who are unhoused may keep their tents up between 9:00 p.m. and 6:00 a.m. See Mayor's Frequently Asked Questions, available at <https://www.lamayor.org/ABridgeHome>. See also LAMC 56.11(7) (providing that tents must be down only between 6:00 a.m. and 9:00 p.m.) We strongly support this decision, particularly in light of the Ninth Circuit decision in *Martin v. City of Boise*, No. 15-35845. (9th Cir., Sept. 4, 2018). The Court in *Martin* expressly adopted the reasoning of a prior Ninth Circuit decision in *Jones v. City of Los Angeles*, 444 F.3d 1118, 1138 (9th Cir. 2006), *vacated*, 505 F.3d 1006 (9th Cir. 2007), which struck down the City's overnight enforcement of LAMC 41.18(d). In addition, we appreciate Chief Moore's statement on September 17, 2018 that the LAPD enforces 41.18(d) during daytime hours only when individuals are interfering with ADA access.

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Other Office Locations:

East Los Angeles Office, 5228 Whittier Blvd., Los Angeles, CA 90022; 213-640-3883  
Long Beach Office, 601 Pacific Ave., Long Beach, CA 90802; 562-435-3501  
Santa Monica Office, 1640 5th St., Suite 124, Santa Monica, CA 90401; 310-899-6200  
Ron Olson Justice Center, 1550 W 8th Street, Los Angeles, CA 90017; 323-801-7989

and share their concerns about the use of special enforcement zones around the new shelters.<sup>3</sup> We write separately because we are also very concerned that the strategy relies on the strict enforcement of LAMC 56.11. This ordinance raises serious constitutional issues and to date, has been enforced in a manner that is both unconstitutional and has undermined any purported public health rationale for the ordinance. As such, strict enforcement of this ordinance will undoubtedly result in increased violations of individuals' constitutional rights.

As you know, the City of Los Angeles has been involved in protracted litigation for over 30 years, related to the seizure and destruction of homeless individuals' belongings.<sup>4</sup> This litigation has stemmed from years of city policies that focused on the visible signs of homelessness, to the exclusion of the needs and constitutional rights of individuals who are homeless in Los Angeles. Each time the City has faced litigation, rather than working with homeless individuals and advocates to develop constitutional strategies to address the public health needs of the community, the City has chosen to legislate around the margins of court orders to continue to seize and destroy individuals' belongings.

LAMC 56.11 and its current implementation is the result of this approach. As such, it suffers from the same infirmities as strategies employed by the City in the past. As discussed below, the ordinance allows for the seizure and destruction of individuals' belongings without affording them any legal protections. Further, the implementation of the ordinance through Clean Streets and Homeless Outreach and Proactive Engagement (HOPE) Team deployments has simply replicated the same violations that have led to litigation in the past.

Individuals who are homeless need increased public health infrastructure and sanitation services, not encampment sweeps and criminalization. Our clients do not object to street cleanings or the provision of sanitation services; in fact, some have been advocating for these services for years.<sup>5</sup> We are confident that Clean Streets could be performed in a constitutional manner and the City could address the public health concerns that exist when 23,000 of the city's residents are unhoused, if the City were willing to shift its focus and investment away from destroying the tents and shelters and onto the public health and sanitation needs of the individuals who live in the city's thousands of encampments. It is our hope the City will take this opportunity to work collaboratively with our clients to adopt solutions that move away from criminalization and instead, focus on the very real and very

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<sup>3</sup> The use of special enforcement zones and law enforcement tactics to ensure that homeless individuals do not return to an area has resulted in well-documented unconstitutional policing practices by the Los Angeles Police Department. *See e.g., Fitzgerald v. City of Los Angeles*, 485 F. Supp. 2d 1137 (2007).

<sup>4</sup> *See e.g., Bennion v. City of Los Angeles*, C637718 (L.A. Sup. Ct. 1987); *Justin v. City of Los Angeles*, CV 00-12352 (C.D. Cal. 2001); *Lavan v. City of Los Angeles*, CV 11-2874 (C.D. Cal. 2011); *Noe v. City of Los Angeles* (C.D. Cal. 2013) (lawsuit against the City of Los Angeles for the illegal seizure of homeless residents' property in Venice); *Los Angeles Catholic Worker v. Los Angeles Downtown Industrial District*, 14-07344 (C.D. Cal. 2014) (lawsuit brought by two groups and four individual plaintiffs, accusing the City of collaborating with a Business Improvement District to illegally seize homeless people's property); *Mitchell v. City of Los Angeles*, 16-cv-01750 SJO (AXW) (C.D. Cal., March 23, 2016); *Recchia v. City of Los Angeles*, 889 F.3d 553, 558 (9th Cir. 2018).

<sup>5</sup> *See e.g.,* Los Angeles Community Action Network, "The Dirty Divide in Downtown Los Angeles: A Call for Public Health Equity," April 2013; "Dirty Divide: Out of Service," November 10, 2017.

important public health needs of our community. We would welcome the opportunity to meet with the City before October 5, 2018 to discuss these issues.

**I. Los Angeles Municipal Code Section 56.11 is Unconstitutional as Drafted and Has Been Enforced in an Unconstitutional Manner**

The focus on the enforcement of Los Angeles Municipal Code Section 56.11 in the new THS Zones raises constitutional concerns because, as outlined below, a number of provisions of this ordinance are unconstitutional as drafted. Moreover, the ordinance has routinely been enforced in unconstitutional ways that simply replicate strategies that have led to litigation and court orders against the City. The plan to use this ordinance in the THS Zones to ensure that homeless individuals do not return to a particular area only exacerbates the constitutional issues with the ordinance.

**a. Individuals Who Are Homeless Have A Constitutionally Protected Property Interest in Their Belongings**

It should be beyond legal dispute that people who are homeless have constitutionally protected property interests in their belongings, just as housed individuals do.<sup>6</sup> Federal courts throughout the country have reiterated this basic premise over the past thirty years. A number of those decisions have come as the result of litigation against the City of Los Angeles.<sup>7</sup>

In 2012, the U.S. District Court in *Lavan v. City of Los Angeles* issued a preliminary injunction against the City to prevent it from seizing and destroying homeless individuals' belongings.<sup>8</sup> In affirming the district court, the Ninth Circuit summarily rejected "the City's invitation to impose this unprecedented limitation on the Fourth Amendment's guarantees" by holding that homeless individuals did not have a property interest in their belongings.<sup>9</sup>

Similarly, in *Mitchell v. City of Los Angeles*,<sup>10</sup> which is currently pending in the U.S. District Court, the court issued another preliminary injunction against the City of Los Angeles, which remains in place today. In issuing the injunction that regulates how the City must handle homeless individuals' belongings that are seized as part of a mass cleanup or incident to arrest, the court again reminded the City that individuals have a protected property interest in their belongings.<sup>11</sup>

Most recently, in *Recchia v. City of Los Angeles*, the Ninth Circuit Court of Appeals yet again explicitly affirmed that homeless people living on the streets of Los Angeles are entitled to the same constitutional protection of their belongings that housed individuals enjoy.<sup>12</sup> Other courts, considering

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<sup>6</sup> U.S. Const., Amend. IV, XIV.

<sup>7</sup> See e.g., *Recchia v. City of Los Angeles*, 889 F.3d 553, 558 (9th Cir. 2018); *Lavan v. City of Los Angeles*, 693 F.3d 1022, 1029 (9th Cir. 2012); *Mitchell v. City of Los Angeles*, 16-cv-01750 SJO (C.D. Cal., April 16, 2016).

<sup>8</sup> 797 F. Supp. 2d 1005, 1020 (C.D. Cal. 2011).

<sup>9</sup> 693 F.3d 1022, 1031 (2012).

<sup>10</sup> 16-cv-01750 SJO (AXW) (C.D. Cal., March 23, 2016).

<sup>11</sup> See *Mitchell*, Order Granting Plaintiffs' Application for a Preliminary Injunction, April 16, 2016 at p. 4.

<sup>12</sup> 889 F.3d at 558.

similar practices in other jurisdictions throughout the country have come to the same conclusion.<sup>13</sup> Therefore, there should be no debate that homeless individuals have a property interest in their belongings, and that interest is protected by the United States Constitution.

**b. Los Angeles Municipal Code Section 56.11 Unlawfully Authorizes The Seizure Of Homeless Individuals' Belongings Without A Warrant**

Given that homeless individuals have a constitutionally protected property interest in their belongings, the seizure of an individual's belongings, without a warrant, is per se unreasonable, absent the application of one of only a limited number of exceptions to the warrant requirement.<sup>14</sup>

As drafted, Los Angeles Municipal Code Section 56.11 allows the City to seize homeless individuals' belongings, without a warrant, in a number of specific instances. For example, section 3(b) of 56.11 allows the City to "impound any Attended Excess Personal Property Stored in a Public Area."<sup>15</sup> Excess Personal Property Stored in a Public Area includes any and all items a person has that "cumulatively exceeds the amount of property that could fit in a 60-gallon container with the lid closed," and which is placed in any public area in the City of Los Angeles.<sup>16</sup> Section 3(i) provides that, "[w]ithout prior notice, the City may remove and may discard any Bulky Item, whether Attended or Unattended, Stored in a Public Area unless the Bulky Item is designed to be used as a shelter. . . ."<sup>17</sup> Section 7 allows the City to impound an individual's tent, if the tent is constructed during the day.<sup>18</sup>

None of these sections require that any exception to the warrant requirement exist before the items can be seized by the Department of Sanitation. Both sections 3(b) and 3(i) allow the seizure of property based on the size or volume of the total property an individual has in their possession (section 3(b)), or the size of a single item (section 3(i)). These provisions do not require the application of any of the narrow exceptions recognized by courts that would exempt the Department of Sanitation from first seeking a warrant before seizing these items. Nor do the protocols adopted by the Department of Sanitation in April 2016 and amended in August 2018 require that such an exception exists.<sup>19</sup>

The City cannot simply pass an ordinance allowing for the seizure of property and exempt itself from the warrant requirements of the Fourth Amendment. This point was made explicitly clear in *Lavan v. City of Los Angeles*.<sup>20</sup> "[T]he decision to impound pursuant to the authority of

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<sup>13</sup> See e.g., *Schuler et al. v. County of Orange*, Case No. SA CV 17-0259-DOC (KESx) (C.D. Cal. Mar. 6, 2017); *Smith v. Corvallis*, Civ. No. 6:14-cv-01382-MC (D. Or. June 6, 2016); *Lehr v. City of Sacramento*, 624 F. Supp. 2d 1218 (E.D. Cal. 2009); *Sanchez v. City of Fresno*, 914 F. Supp. 2d 1094, 1103 (E.D. Cal. 2012); *Johnson v. Freeman*, 351 F. Supp. 2d 929 (E.D. Mo. 2004); *Pottinger v. City of Miami*, 810 F. Supp. 1551 (S.D. Fla. 1992).

<sup>14</sup> *Recchia v. City of Los Angeles*, 889 F.3d 553 (9th Cir. 2018). See also *Miranda v. City of Cornelius*, 429 F.3d 858, 862 (9th Cir. 2005).

<sup>15</sup> LAMC 56.11(3)(b).

<sup>16</sup> LAMC 56.11(2).

<sup>17</sup> LAMC 56.11(3)(i).

<sup>18</sup> LAMC 56.11(7).

<sup>19</sup> LAMC 56.11 Standard Operating Protocols.

<sup>20</sup> 693 F.3d 1022, 1030 (9th Cir. 2012) (holding that the seizure and destruction of property pursuant to a prior version of LAMC 56.11 was unreasonable).

a city ordinance and state statute does not, in and of itself, determine the reasonableness of the seizure under the Fourth Amendment. . . .”<sup>21</sup> Nor does the fact that the property is in public allow the City to seize the items without a justification under the Fourth Amendment.<sup>22</sup> Absent a warrant or an applicable exception, the seizure of an individual’s belongings is unreasonable under the Fourth Amendment.<sup>23</sup> Because LAMC 56.11 and its operating regulations do not require the City to obtain a warrant before seizing property, the ordinance, as drafted, is unconstitutional.<sup>24</sup>

**c. The Summary Destruction Of Items Violates The Fourth And Fourteenth Amendments**

Pursuant to numerous sections of LAMC 56.11(3), the City may seize and immediately destroy items that fall into a number of categories. For example, LAMC 56.11(3)(i) allows the City to immediately seize and destroy any items placed in any public space within the City of Los Angeles that do not fit within a 60 gallon trash can with the lid closed.<sup>25</sup> This includes items like wagons and carts, tents that are larger than 60 gallons, and other items that are critical for an individual’s survival on the streets. It also includes bicycles and wheelchairs that are deemed “inoperable.”<sup>26</sup>

First, the immediate destruction of property raises Fourth Amendment concerns separate from those related to the initial seizure of the items. Even if property is properly seized, the destruction of these belongings can render the seizure unreasonable. As the Ninth Circuit has noted, “the destruction of property by state officials poses as much of a threat, if not more, to people’s right to be secure in their effects as does the physical taking of them.”<sup>27</sup>

Second, LAMC 56.11 does not provide opportunity for any sort of due process for individuals whose belongings are seized and destroyed pursuant to these provisions. Courts have routinely held that ordinances that provide no form of procedural due process “leaves them absolutely unconstitutional on their face.”<sup>28</sup>

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<sup>21</sup> *Id.*, citing *Miranda*, 429 F.3d at 864.

<sup>22</sup> *See Soldal v. Cook County*, 506 U.S. 56, 68 (1992); *Recchia*, 889 F.3d at 558.

<sup>23</sup> *Recchia*, 889 F.3d at 558.

<sup>24</sup> *See City of Los Angeles v. Patel*, 135 S.Ct. 2443, 2452 (2015).

<sup>25</sup> The definition of “bulky item” is broad and includes “any item, with the exception of a constructed Tent, operational bicycle or operational walker, crutch or wheelchair, that is too large to fit into a 60-gallon container with the lid closed, including, but not limited to, a shed, structure, mattress, couch, chair, other furniture or appliance. A container with a volume of no more than 60 gallons used by an individual to hold his or her Personal Property shall not in itself be considered a Bulky Item.” LAMC 56.11(2)(c).

<sup>26</sup> *Id.* LAMC 56.11(3)(g) and (h) also allow for the summary destruction of items that constitute an immediate threat to public health and safety or are evidence of a crime or contraband, respectively.

<sup>27</sup> *San Jose Charter of Hells Angels Motorcycle Club v. San Jose*, 402 F.3d 962, 975 (9th Cir. 2005) (internal quotation marks and citations omitted). *See also Lavan*, 693 F.3d at 1030-31.

<sup>28</sup> *Wong v. City and County of Honolulu*, 333 F. Supp. 2d 942, 950 (D. Haw., 2004) (citing *Craig v. Carson*, 449 F. Supp. 385, 395 (M.D. Fla. 1978)); *Draper v. Coombs*, 792 F.2d 915, 923 (9th Cir. 1986) (holding that a Portland statute that did not provide for a hearing regarding the seizure of vehicles violated the due process clause). *See also Fuentes v. Shevin*, 407 U.S. 67, 96-97 (1972) (notice and hearing required before government seizes personal property).

When the Department of Sanitation seizes a homeless individual's items pursuant to provisions that allow items to be immediately destroyed, the individual whose property is seized has no opportunity to challenge the legitimacy of the seizure, let alone seek the return of the seized item. For example, an individual cannot challenge whether the item was in fact larger than 60 gallons, or if their bike or wheelchair was "operational." There is no recourse to challenge the arbitrary decision-making that occurs on the streets. This is prohibited by the Fourteenth Amendment, which requires that the City "provide procedural protections before permanently depriving [individuals] of their possessions."<sup>29</sup>

**d. The Ordinance Impermissibly Allows Law Enforcement to Arrest Individuals For Interfering With Unconstitutional Seizures**

Los Angeles Municipal Code Section 56.11(10) makes it a crime, punishable by up to six months in jail or a \$1000.00 fine, to interfere with a City official's implementation of the prohibitions of Section 3.<sup>30</sup> Specifically, Section 10(a) provides that "[n]o Person shall willfully resist, delay or obstruct a City employee from moving, removing, impounding or discarding Personal Property Stored in a Public Area in violation of Subsections 3.(a)-(h)."<sup>31</sup> Section 10(d) provides that "[n]o Person shall willfully resist, delay or obstruct a City employee from removing or discarding a Bulky Item Stored in violation of Subsection 3.(i), including by refusing to vacate or retreat from within the Bulky Item or from an obscured area created by the Bulky Item."<sup>32</sup>

As discussed above, these provisions allow for the unconstitutional seizure of property. The City cannot therefore arrest an individual from attempting to prevent the illegal seizure of their belongings. Doing so is unconstitutional.<sup>33</sup>

**e. LAMC Section 56.11 is Currently Enforced in an Unconstitutional Manner**

The protocol adopted by the City to create THS Zones surrounding the Bridge Home shelters provide for both frequent rapid response interventions by Homeless Outreach and Proactive Engagement (HOPE) teams and weekly "Clean Streets" cleanings as part of its enforcement of LAMC 56.11.<sup>34</sup> These strategies have already been deployed city-wide and have resulted in significant constitutional violations. These violations are endemic and well-documented, and include but are not limited to the following:

1. HOPE teams and Clean Streets teams routinely seize and destroy property while the owners of the belongings are present and attempting to prevent their destruction, rendering the seizure unreasonable under the Fourth Amendment. The seizure and immediate destruction of property

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<sup>29</sup> *Lavan*, 693 F.3d at 1032.

<sup>30</sup> See LAMC 56.11(10), LAMC 11.

<sup>31</sup> LAMC 56.11(10)(a).

<sup>32</sup> LAMC 56.11(10)(d).

<sup>33</sup> See *Camara v. Municipal Court of City and County of San Francisco*, 387 U.S. 523, 540 (1967).

<sup>34</sup> LAMC 56.11 Standard Operating Protocols, Protocol No. 12.

also deprives the individuals of any due process to contest any determinations the City believes justify the seizure or destruction, in violation of the Fourteenth Amendment.<sup>35</sup>

2. HOPE teams routinely seize and destroy unattended property, even though the property is clearly not abandoned, the owner is known to the HOPE teams, or individuals present indicate they will take responsibility for the property. The summary seizure and destruction of belongings in these circumstances violates the Fourth and Fourteenth Amendment.<sup>36</sup>
3. LA Sanitation routinely fails to provide adequate notice of scheduled cleanups. Notices that may be posted by Sanitation do not provide adequate information about the area covered by the notices, nor are postings calculated to ensure that individuals are aware of the cleanups.<sup>37</sup> As such, individuals are not given sufficient notice to move their belongings, which in turn is used to justify the seizure and destruction of those belongings, in violation of the Fourth and Fourteenth Amendment.<sup>38</sup>
4. LA Sanitation and the Los Angeles Police Department routinely fail to provide accommodation or support to individuals with disabilities who are unable to or have difficulty trying to respond to the requirement that individuals remove their belongings from an area within a limited amount of time. Individuals who are not able to respond in the short amount of time provided by law enforcement are subject to arrest and often lose their belongings as a result of the delays. These practices are a violation of due process and the Americans with Disabilities Act.<sup>39</sup>
5. Items that are retained are stored in an inaccessible manner. When individuals receive notice that their items are seized, they are notified that the items may be retrieved from a single location in downtown Los Angeles, regardless of the location of the seizure. An individual whose property is seized from the West San Fernando Valley, Venice, or San Pedro must travel over 30 miles to retrieve their belongings, and then must carry their belongings back to the neighborhood where they live. This is an impossible task for many individuals who are homeless and do not have access to transportation. Even to determine if any items have been stored, an individual must have access to a phone and have received a case number or notice that items were stored following an encampment cleanup. This too is a violation of the Americans with Disabilities Act and the Fourteenth Amendment.<sup>40</sup>

Given the very serious implications of these practices, we are extremely concerned that these practices will simply be replicated in the special enforcement zones. This is particularly true, given the

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<sup>35</sup> *Lavan*, 693 F.3d at 1032.

<sup>36</sup> *Id.*, see also *Logan v. Zimmerman Brush Co.*, 455 U.S. 422, 434 (1992).

<sup>37</sup> See *Nozzi v. Housing Authority of City of Los Angeles*, 806 F.3d 1178, 1194 (9th Cir. 2015).

<sup>38</sup> *Lavan*, 693 F.3d at 1032.

<sup>39</sup> *Id.*; 42 U.S.C. § 12101 *et seq.*

<sup>40</sup> *Schuler*, *supra* note 13 at 8 (granting a temporary restraining order to a group of plaintiffs whose belongings were seized and stored miles away, in part because “the remoteness of the storage facility . . . is unlikely to truly mitigate against a due process violation”).

stated purpose of the strict enforcement of LAMC 56.11 is to placate housed neighbors and ensure that homeless individuals do not return to the designated enforcement zones.

## **II. These Policies And Practices Exacerbate The Public Health And Sanitation Issues They Are Purportedly Intended To Address**

The City has justified the significant expenditure of public resources on HOPE teams and Clean Streets as necessary to address the public health concerns that exist when a significant number of individuals in a community are compelled to live on the streets. While there may be very real public health concerns that exist when thousands of residents are compelled to live on the streets and sidewalks, the focus on the destruction of property, rather than the public health needs of the individuals who are homeless, is counter-productive and serves only to undermine the actual public health needs of the community.

The health impacts of the destruction of individuals' property are significant. The impact of the destruction of medication, medical equipment, and other items cannot be overstated. The seizure and destruction of individuals' tents, sleeping bags, blankets, and clothing places those individuals at risk of exposure in the winter and heat stroke in the summer.<sup>41</sup> The City also routinely destroys even non-perishable food and water. Where individuals have invested in their own resources to keep their encampments clean—brooms, carts to transport water, trashcans—the City has also seized and destroyed those items.

Beyond the actual destruction of individuals' belongings, the City's practices have significant negative impacts on individuals who are homeless. For example, the frequency and unplanned nature of encampment sweeps make it extremely difficult for individuals who are unhoused to make medical appointments, keep jobs, or find housing, based on the real fear their belongings will be seized and destroyed if they leave these items unattended. Even worse, carts, strollers, and other items used by individuals to transport their belongings are routinely seized and destroyed as "bulky items," which makes it more challenging for individuals to pack up and move their belongings, as required by the frequent sweeps.

Even when individuals are given 24 hour notice of an encampment cleanup, the need to be present for the clean up can force an individual to miss a day of work, a medical appointment, an appointment with a case manager, a court date, a meeting with the Housing Authority, or one of the many "homeless connect days" and resource fairs sponsored by the City of Los Angeles to provide services to individuals who are homeless. Individuals who are homeless are left with the Hobson's choice of missing a critical appointment or risking the seizure and destruction of the very items they need to survive.

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<sup>41</sup> See e.g., *Sanchez v. City of Fresno*, 914 F. Supp. 2d 1079, 1100 (E.D. Cal. 2012) (recognizing a substantive due process claim when the City of Fresno allegedly destroyed plaintiff's shelter and property essential to protection from the elements).

The constant trauma of sweeps, the loss of property, and the threat of arrests can exacerbate individuals' mental and physical disabilities. Individuals who have been arrested, who have been forced to watch their belongings destroyed, or who have simply returned to find their precious mementos and belongings gone from the street, report significant anxiety, depression, and other symptoms of trauma. The constant sweeps and requirement that individuals move their belongings from place to place, while not being able to keep carts, shopping carts, or other items to help them move their property, also exacerbate the considerable physical disabilities that many individuals who are homeless experience.

At the same time the City has invested significant public resources in encampment cleanup and proposes to spend even more in support of the THS Zones surrounding the Bridge Home shelters, the City has failed to invest in public health infrastructure that would help alleviate the purported public health issues that the City uses to justify these practices.<sup>42</sup> While the City has begun to invest in or support community programs that offer these services, the investment is miniscule compared to the amount of resources spent on encampment cleanups and law enforcement. Sporadic and piecemeal services do not effectively address the public health needs of individuals who are living on the street. In general, the City has failed to provide meaningful bathroom access, shower services, laundry services, or even trash and sanitation services to encampments.<sup>43</sup> These investments would have a far greater impact on any public health issues that may exist in the community than property seizures and sweeps.

### **III. The City Has An Opportunity To Change A Failed Policy And Adopt Real Solutions**

For at least thirty years, the City of Los Angeles has relied on sweeps of homeless people's belongings in a misguided attempt to address housed neighbors' concerns about the impact of homelessness in "their neighborhoods." As discussed above, this has led to numerous lawsuits against the City since 1987, specifically related to the seizure and destruction of homeless individuals' belongings.<sup>44</sup>

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<sup>42</sup> "Report of Findings-Request from City of Los Angeles to Address Public Health Issues in the Skid Row Area of Downtown Los Angeles." 05/21/2012. Jacqueline Taylor, Bureau Director, Region 1. County of Los Angeles Public Health); *see also* City of Los Angeles Inter-Departmental Correspondence, "Increased Storage and Services for the Homeless," August 25, 2015, Miguel A. Santa, City Administrative Officer, City of Los Angeles (recognizing the need to increase voluntary storage services to "provide a viable option for voluntary ordinance compliance" and noting that doing so will "help attain the stated goals of [LAMC 56.11]").

<sup>43</sup> *See e.g.*, "No Place to Go: An Audit of the Public Toilet Crisis in Skid Row," Los Angeles Central Providers Collaborative, June 2017 (documenting the lack of public restrooms in Skid Row).

<sup>44</sup> *See supra* note 4. This tally does not include other litigation brought against the City based on unconstitutional or unlawful policing practices and enforcement of ordinances against individuals who are homeless. *See e.g.*, *Jones v. City of Los Angeles*, 444 F.3d 1118, 1138 (9th Cir. 2006), *vacated*, 505 F.3d 1006 (9th Cir. 2007) (invalidating the City's anti-camping ordinance on the ground that it constituted cruel and unusual punishment because of the lack of shelter beds in Skid Row); *Desertrain v. City of Los Angeles*, 754 F.3d 1147 (9th Cir. 2014); *Fitzgerald v. City of Los Angeles*, No. CV 03-

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Letter to Mayor Garcetti re: LAMC 56.11

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When the City has faced litigation, rather than addressing the concerns in a productive and constitutional way, it has instead attempted to draft policies and procedures to allow the City to simply continue the practice of seizing and destroying individuals' belongings. This has led to a vicious cycle of criminalization, constitutional violations, and litigation that has persisted in Los Angeles for decades. After 30 years, it should be clear that this cycle does not serve the needs of anyone in this city.

Given the resources currently available in Los Angeles, there is a tremendous opportunity for the City to break this cycle. You have the chance to move away from criminalization and instead, focus on the public health and sanitation needs of the community, which in turn would ameliorate many of the concerns that are used to justify the City's unconstitutional practices. The Bridge Home shelter program is a bold initiative, but coupling the opening of the shelters with special enforcement zones, including the reliance on a constitutionally suspect ordinance, undermines the value of the program to unhoused people in Los Angeles. Rather than moving the City forward, this approach promises to perpetuate this cycle.

We request the City reconsider its plan to implement a THS Zone around the new Bridge Home Shelter at El Pueblo, and instead, meet with us to discuss ways in which the City can balance the public health needs of the City in a way that not infringe on individuals' constitutional rights. As we indicated above, we would welcome the opportunity to discuss these concerns before October 5, 2018.

Sincerely,



Shayla R. Myers  
Romy Ganschow  
Barbara J. Schultz  
Legal Aid Foundation of Los Angeles



Catherine Sweetser  
Colleen Mullen  
Schonbrun Seplow Harris and Hoffman

CC (via email): Councilmember Gilbert Cedillo  
Councilmember Paul Krekorian  
Councilmember Bob Blumenfield  
Councilmember David E. Ryu  
Councilmember Paul Koretz  
Councilmember Nury Martinez

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Letter to Mayor Garcetti re: LAMC 56.11

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Councilmember Monica Rodriguez  
Councilmember Marquis Harris-Dawson  
Councilmember Curren D. Price, Jr.  
Councilmember Herb J. Wesson, Jr.  
Councilmember Mike Bonin  
Councilmember Mitchell Englander  
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# EXHIBIT B



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Our File Number 19-1306127

**VIA EMAIL AND U.S. MAIL**

February 18, 2020

Scott Marcus  
Gabriel Dermer  
Patricia Ursea  
Felix Lebron  
Office of the City Attorney  
200 N. Main Street, 6th Floor  
Los Angeles, California 90012

RE: *Garcia v. City of Los Angeles*; Case No. 2:19-cv-06182

Dear Counsel,

We have reviewed the Court's ruling on the City of Los Angeles's motion to dismiss, and in particular, the Court's denial of the City's motion to dismiss Plaintiffs' facial challenges to Los Angeles Municipal Code Sections 56.11(3)(i) and 56.11(10)(d).

The Court's ruling is clear that the Bulky Item provision is facially unconstitutional under the Fourth and Fourteenth Amendments of the United States Constitution and Article I, Sections 7 and 13 of the California Constitution. As such, the continued enforcement of the ordinance violates the rights of unhoused residents throughout the City. However, despite the clarity of the Court's ruling, today's CARE+ schedules indicate that bulky items are still subject to enforcement.

We request the City immediately cease enforcement of these provisions and stipulate to a preliminary injunction, enjoining the City from enforcing LAMC Sections 56.11(3)(i) and 56.11(10)(d). If the City is unwilling to stipulate to such an injunction, then we will seek one from the Court.

It is our hope that the parties can reach an agreement without the need for further intervention from the court. Doing so will preserve both city and judicial resources and potentially open the door to a broader conversation which Judge Fischer made clear at the February 10<sup>th</sup> hearing, should happen here. As we have indicated on numerous occasions, we remain open to working towards a meaningful resolution without protracted litigation. But of course, we will seek court intervention if necessary to protect our clients' rights.

**Other Office Locations:**

**East Los Angeles Office**, 5228 Whittier Blvd., Los Angeles, CA 90022; 213-640-3883  
**Long Beach Office**, 601 Pacific Ave., Long Beach, CA 90802; 562-435-3501  
**Santa Monica Office**, 1640 5th St., Suite 124, Santa Monica, CA 90401; 310-899-6200  
**Ron Olson Justice Center**, 1550 W 8th Street, Los Angeles, CA 90017; 323-801-7989

**LSC** | America's Partner  
for Equal Justice  
LEGAL SERVICES CORPORATION

Letter to City of Los Angeles  
Page 2 of 2

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Please let us know by the close of business on Wednesday, February 19<sup>th</sup> how you wish to proceed.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Myers". The signature is fluid and cursive, with the first name "Shayla" and last name "Myers" clearly distinguishable.

Shayla R. Myers  
Legal Aid Foundation of Los Angeles

Catherine Sweetser  
Schonbrun Seplow Harris and Hoffman

Benjamin Herbert  
Kirkland & Ellis LLP

# EXHIBIT C



Catherine Sweetser &lt;catherine.sdshhh@gmail.com&gt;

---

**Garcia v. City of Los Angeles, Case No. 2:19-cv-06182**

---

**Shayla R. Myers** <SMyers@lafla.org>

Fri, Feb 21, 2020 at 6:14 PM

To: Gabriel Dermer &lt;gabriel.dermer@lacity.org&gt;

Cc: Scott Marcus &lt;Scott.Marcus@lacity.org&gt;, Patricia Ursea &lt;patricia.ursea@lacity.org&gt;, Felix Lebron &lt;felix.lebron@lacity.org&gt;, Benjamin Herbert &lt;benjamin.herbert@kirkland.com&gt;, "Onufer, Michael" &lt;michael.onufer@kirkland.com&gt;, Catherine Sweetser &lt;catherine.sdshhh@gmail.com&gt;

Gabriel,

We are following up from our letter on Tuesday regarding the ongoing enforcement of LAMC 56.11(3)(i) and 56.11(10)(d), in light of the Court's ruling on the City's motion to dismiss. When we spoke on the phone on Wednesday, you indicated that you would get back to us today following your meeting with the City Attorney.

Since we have not heard from you, we assume the City remains unwilling to work with us without further court intervention. We are disappointed, but given the significant interests at stake, we intend to move for a preliminary injunction early next week.

**Shayla Myers** | Senior Attorney*Pronouns: she, her, hers***Legal Aid Foundation of Los Angeles**[7000 S. Broadway | Los Angeles, CA 90003](#)213.640.3983 **direct** | 213.640.3988 **facsimile****From:** Gabriel Dermer <gabriel.dermer@lacity.org>**Sent:** Wednesday, February 19, 2020 2:27 PM**To:** Shayla R. Myers <SMyers@lafla.org>**Cc:** Scott Marcus <Scott.Marcus@lacity.org>; Patricia Ursea <patricia.ursea@lacity.org>; Felix Lebron <felix.lebron@lacity.org>; Benjamin Herbert <benjamin.herbert@kirkland.com>; Onufer, Michael

2/25/2020

Gmail: Garcia v. City of Los Angeles, Case No. 2:19-cv-06182

<michael.onufer@kirkland.com>; Catherine Sweetser <cath.sweetser@gmail.com>

#1082

**Subject:** Re: Garcia v. City of Los Angeles, Case No. 2:19-cv-06182

Hi Shayla,

[Quoted text hidden]

[Quoted text hidden]

# EXHIBIT D



Catherine Sweetser &lt;catherine.sdshhh@gmail.com&gt;

---

**Garcia v. City of Los Angeles, Case No. 2:19-cv-06182**

---

**Gabriel Dermer** <gabriel.dermer@lacity.org>

Fri, Feb 21, 2020 at 6:17 PM

To: "Shayla R. Myers" &lt;SMyers@lafla.org&gt;

Cc: Scott Marcus &lt;Scott.Marcus@lacity.org&gt;, Patricia Ursea &lt;patricia.ursea@lacity.org&gt;, Felix Lebron &lt;felix.lebron@lacity.org&gt;, Benjamin Herbert &lt;benjamin.herbert@kirkland.com&gt;, "Onufer, Michael" &lt;michael.onufer@kirkland.com&gt;, Catherine Sweetser &lt;catherine.sdshhh@gmail.com&gt;

Hi Shayla,

We are still discussing things internally. I don't have definitive information to share but we are continuing to discuss things next week. I will share information as soon as I have it, and would ask for your patience in said regard. Thank you and have a nice weekend.

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8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

10 JANET GARCIA, GLADYS ZEPEDA,  
11 MIRIAM ZAMORA, ALI EL-BEY,  
12 PETER DIOCSON JR, MARQUIS  
13 ASHLEY, JAMES HAUGABROOK,  
14 individuals, KTOWN FOR ALL, an  
15 unincorporated association;  
16 ASSOCIATION FOR RESPONSIBLE  
17 AND EQUITABLE PUBLIC  
18 SPENDING, an unincorporated  
19 association

20 Plaintiffs,

21 v.

22 CITY OF LOS ANGELES, a municipal  
23 entity; DOES 1-50,

24 Defendants.  
25  
26  
27  
28

Case No.: 2:19-cv-06182-DSF-PLA  
[Assigned to Judge Dale S. Fischer]

**[PROPOSED] ORDER  
GRANTING PLAINTIFF'S  
MOTION FOR PRELIMINARY  
INJUNCTION**

Hearing:

Date:

Time:

Courtroom:

**[PROPOSED] ORDER**

The Court, having considered Plaintiffs' motion for a preliminary injunction, hereby ORDERS that the City of Los Angeles is enjoined from:

1. Enforcing Section 56.11(3)(i) of the Los Angeles Municipal Code
2. Enforcing Section 56.11(10)(d) of the Los Angeles Municipal Code
3. Posting signs, notices, or other public information stating that the City may seize or immediately destroy any bulky items left in public.

**IT IS SO ORDERED.**

Dated:

---

Hon. Dale S. Fischer  
United States District Judge

Benjamin Allan Herbert (SBN 277356)  
benjamin.herbert@kirkland.com  
William L. Smith (SBN 324235)  
william.smith@kirkland.com  
KIRKLAND & ELLIS LLP  
555 South Flower Street  
Los Angeles, CA 90071  
Telephone: (213) 680-8400  
Facsimile: (213) 380-8500

*Attorneys for Plaintiffs Ktown for All, Ali  
El-Bey, Peter Diocson Jr., Marquis  
Ashley, Association for Responsible and  
Equitable Public Spending, and Janet  
Garcia.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION**

JANET GARCIA, GLADYS  
ZEPEDA, MIRIAM ZAMORA, ALI  
EL-BEY, PETER DIOCSO JR.,  
MARQUIS ASHLEY, JAMES  
HAUGABROOK, individuals,  
KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR  
RESPONSIBLE AND EQUITABLE  
PUBLIC SPENDING, an  
unincorporated association,

Plaintiffs,

v.

CITY OF LOS ANGELES, a  
municipal entity; DOES 1-7,

Defendants.

CASE NO. 2:19-cv-06182-DSF-PLA

**PROOF OF SERVICE**

**PROOF OF SERVICE**

I, LaTonya Fountain, am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is Kirkland & Ellis LLP, 555 South Flower Street, Los Angeles, CA 90071.

On February 26, 2020, I served a copy of the following document(s) described as:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF;**

**DECLARATION OF ADRIAN RISKIN;**

**DECLARATION OF MARQUIS ASHLEY;**

**DECLARATION OF NICHOLAS PRICE;**

**DECLARATION OF NICOLAS EMMONS;**

**DECLARATION OF PETE DIOCSON, JR.;**

**DECLARATION OF PHUONG NGUYEN;**

**DECLARATION OF RACHELLE BETTEGA;**

**DECLARATION OF SHAYLA MYERS;**

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION.**

**PROOF OF SERVICE**

on the interested parties in this action as follows:

☒ **FEDERAL EXPRESS**

By placing the document(s) listed above in a sealed overnight courier envelope as set forth herein and routing the envelope for pick up within Kirkland & Ellis LLP by Federal Express for overnight delivery.

☒ **BY E-MAIL - COURTESY ONLY**

By transmitting via electronic mail to the e-mail address(es) set forth below on this date. I am aware that service is presumed invalid if the email transmission is returned as undeliverable.

**SERVICE LIST**

Michael Feuer, City Att’y  
Kathleen A. Kenealy, Chief Asst. City Att’y  
Scott Marcus, Chief, Civil Litigation Branch  
Gabriel Dermer, Asst. City Att’y (SBN 229424)  
Felix Lebron, Deputy City Att’y (SBN 232984)  
A. Patricia Ursea, Deputy City Att’y (SBN 221637)  
200 N. Main Street, City Hall East,  
Room 675  
Los Angeles, CA 90012

Email: Felix.Lebron@lacity.org  
Patricia.Ursea@lacity.org

*Attorneys for Defendant,  
CITY OF LOS ANGELES*

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

Executed on February 26, 2020, at Los Angeles, California.

  
LaTonya Fountain