

NOV 26 2018

Sherri R. Carter, Executive Officer/Clerk
By: Anabella Zoe Miro, Deputy

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5
6 SUPERIOR COURT OF THE STATE OF CALIFORNIA BY FAX
7 FOR THE COUNTY OF LOS ANGELES

8 ADRIAN RISKIN,
9
10 Petitioner and Plaintiff,

11 vs.

12 COMMUNITY BUILD, INC., a nonprofit
corporation,
13 Respondent and Defendant.

Case No.:

18STCP02945

VERIFIED PETITION FOR WRIT OF
MANDATE AND COMPLAINT FOR
DECLARATORY RELIEF

[Gov't Code §§ 6250, *et seq.*; Civ. Proc. Code
§§ 1085, *et seq.*]

1 **INTRODUCTION**

2 1. This is a petition to enforce the California Public Records Act (“CPRA”) against
3 Respondent and Defendant (“Respondent”) Community Build, Inc., AKA the Greater Leimert Park
4 Village/Crenshaw Corridor Business Improvement District (“the BID”). Petitioner and Plaintiff
5 (“Petitioner”) Adrian Riskin submitted a request for public records to the BID asking for access to
6 clearly-identifiable records subject to mandatory disclosure under the CPRA. Despite Petitioner’s
7 repeated attempts over many months to request records by email, telephone, and certified mail,
8 Respondent has failed to respond at all to Petitioner’s request. Respondent has thereby violated the
9 CPRA.

10 2. The public’s access to information is obstructed by Respondent’s flagrant and
11 repeated and violations of the CPRA. By this Petition and Complaint (“Petition”) and pursuant to
12 the Code of Civil Procedure §§ 1085, *et seq.* and Government Code §§ 6250, *et seq.*,¹ Petitioner
13 respectfully requests from this Court (1) a writ of mandate to command Respondent to disclose all
14 non-exempt information Petitioner requested and thereby comply with the CPRA, and (2) a
15 declaration that Respondent’s conduct, policies, and pattern and practice of denying access to public
16 records violates the CPRA.

17 **JURISDICTION AND VENUE**

18 3. This Court has jurisdiction under Gov’t Code §§ 6258, 6259, Code of Civ. Proc.
19 § 1085, and Article VI, Section 10 of the California Constitution.

20 4. Venue is proper in this Court. The records in question, or some portion of them, are
21 situated in the County of Los Angeles, Gov’t Code § 6259; the acts or omissions complained of
22 occurred in the County of Los Angeles, Code of Civ. Proc. § 393; and Respondent is located in the
23 County of Los Angeles, Code of Civ. Proc. § 395.

24 **PARTIES**

25 5. Petitioner Adrian Riskin is a resident of Los Angeles, holds a PhD in mathematics, is
26 a mathematics professor at a local college, and is an open records activist. Riskin utilizes public
27 records requests to investigate and understand the activities of BIDs, the Los Angeles City

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¹ Unless otherwise stated, all references to code sections are to the California Government Code.

1 government, and the relationship between the two. He publicizes his findings to the public through
2 blogging and community events. Information Riskin has uncovered via CPRA requests has assisted
3 academic researchers and the public at large in understanding BIDs and their power in the
4 community. For example, Riskin’s research regarding BIDs’ involvement in the thwarted
5 formulation of a Skid Row Neighborhood Council, uncovered largely through public records
6 requests, was recently featured as part of an exhibit at the Los Angeles Poverty Department
7 Museum. Documentary filmmakers have used records Riskin uncovered to inform their ongoing
8 production of a film on the Greater West Hollywood Food Coalition and the Hollywood Media
9 District BID. Additionally, Riskin has empowered the public to use the CPRA effectively for both
10 research and civic activism by publishing a guide to the practical use of the CPRA in the City of
11 Los Angeles. Riskin is a member of the public within the meaning of §§ 6252(b)-(c).

12 6. Respondent Community Build, Inc. is a property owners’ association pursuant to the
13 Property and Business Improvement District Law of 1994, California Streets & Highways Code
14 § 36600, *et seq.* Respondent contracts with the City of Los Angeles to administer the Greater
15 Leimert Park Village/Crenshaw Corridor BID. Respondent is subject to the CPRA as a matter of
16 state law. California Streets & Highways Code § 36612. Respondent’s contract with the City of Los
17 Angeles also explicitly states that Respondent is “subject to and must comply with” the CPRA.

18 **FACTUAL ALLEGATIONS**

19 **Background on the gentrification and Chesapeake Apartments controversy at issue in**
20 **Petitioner’s unanswered CPRA request**

21 7. The city of Los Angeles is home to approximately 40 BIDs, including the Greater
22 Leimert Park Village/Crenshaw Corridor BID. Although BIDs are private entities governed by
23 unelected, private officials, they collect monetary assessments from local property owners and can
24 have substantial impact on the manner in which neighborhoods operate—from influencing which
25 businesses operate in an area, to instituting private security forces and expelling homeless
26 individuals from public spaces. Given their level of public power, BIDs are subject to relatively
27 little public oversight, making the CPRA an important tool to unveil and understand their activities.

28 8. The geographic boundaries of Respondent’s BID encompass Leimert Park, a

1 predominantly African American neighborhood in South Los Angeles. With the onset of a new
2 subway line running through the center of the BID, the area is beginning to undergo rapid
3 redevelopment, changing demographics, and gentrification which have been sources of concern for
4 some of the neighborhood's long-time residents. The Los Angeles Times reports that while
5 "Leimert Park has long been an entry point to homeownership and a comfortable living for the
6 black middle and working class," recent gentrification in the area has left many residents "unable to
7 afford the rising rents and higher home prices."² As such, in late 2017, nearly 50 organizations
8 rallied in Leimert Park at a Resist Gentrification Action Summit in response to what many perceive
9 as an urgent crisis in the neighborhood.

10 9. Reflective of the changing landscape of the area under the BID's purview, a
11 controversy has arisen in the community regarding the Chesapeake Apartments, a 425-unit
12 apartment complex that lies just outside the BID's boundaries. In 2017, Los Angeles City Attorney
13 Mike Feuer filed a lawsuit against the owner of Chesapeake Apartments, Swaranjit Nijjar, alleging
14 that he had negligently allowed gang activity to take place on the property and thereby endangered
15 public safety. The suit seeks, in part, an injunction against gang activity in the complex, an
16 obligatory video-monitoring system, increased tenant screening processes, and the presence of
17 armed security guards on site. Some activists have spoken out against the lawsuit, arguing that the
18 City Attorney has only become concerned about violence in the neighborhood since it recently
19 began to gentrify. Moreover, they argue that the suit may be used as pretense for racial profiling and
20 harassment of African American residents in the area.

21 10. During this time of upheaval in the BID's neighborhoods, the BID will reach the end
22 of its contractual operating period at the close of 2018. It is currently in the process of seeking not
23 only contractual renewal, but also an expansion of its geographic scope. The BID appears to have
24 retained the services of the consulting firm Urban Design Center to assist in its renewal and
25 expansion process.

26 11. Through his request for public records, Petitioner seeks to understand whether the
27 BID played any role in the genesis of the suit against Chesapeake Apartments and in the area's

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² See <https://www.latimes.com/local/lanow/la-me-leimert-park-20170208-story.html>.

1 rapid gentrification generally. Particularly given the significant changes taking place within the
2 BID's boundaries and the BID's efforts to expand its scope in 2019, the public's understanding of
3 the BID's role in the gentrification of the Leimert Park area is vital. By refusing to respond even
4 nominally to Riskin's repeated requests for clearly-identifiable public records subject to disclosure,
5 the BID has completely disregarded the need for transparency and continues to prevent the public
6 from understanding its most basic functions during a critical time for the neighborhood.

7 **Respondent violated the CPRA by failing to provide any public records in response to**
8 **Riskin's public records request**

9 12. On June 5, 2018, Riskin submitted a CPRA request to Respondent via email. He sent
10 the email to the BID's public-facing email address, info@villagecorridorbid.org, and to
11 Respondent's Chief Executive Officer and Interim President, Kimberly Ramsey ("Ramsey"), at
12 kramsey@communitybuild.org. The request sought three categories of records: (1) all emails
13 between anyone on the BID Board or staff and anyone at a list of enumerated domains (such as
14 lapd.online, lacity.org, lasd.org, and others) from January 1, 2017 through the date of compliance
15 with the request; (2) all emails in the possession of anyone on the BID Board or staff which
16 contained an enumerated list of keywords related to the Chesapeake Apartment controversy from
17 January 1, 2017 through the date of compliance with the request; and (3) certain records related to
18 the BID's retention of a consultant regarding its contractual renewal process. Respondent provided
19 no response to Riskin's CPRA request. *A true and correct copy of Riskin's June 5, 2018 email to*
20 *Respondent is attached as Exhibit A.*

21 13. On June 20, 2018, Riskin sent another email to Respondent at the same two email
22 addresses inquiring as to the status of his request. He notified Respondent that it had not complied
23 with its legal duty to respond to his request within 10 days of receipt. *See § 6253(c).* Again,
24 Respondent provided no response to Riskin's request. *A true and correct copy of Riskin's June 20,*
25 *2018 email to Respondent is attached as Exhibit B.*

26 14. On June 24, 2018, Riskin forwarded his request to a number of other individuals
27 affiliated with the BID asking for their assistance in accessing the requested documents. Riskin sent
28 his request to: Respondent's public-facing email address, info@communitybuild.org; Brenda

1 Shockley, Respondent's agent for service of process as then registered with the Secretary of State,
2 at b.shockley@communitybuild.org,³ bshock8402@aol.com, and brenda.shockley@lacity.org; and
3 Phyllis Parker, Respondent's Senior Administrative Assistant, at pparker@communitybuild.org.
4 Riskin also again sent the request to the BID's public-facing email address and to Ramsey. Again,
5 Respondent provided no response to Riskin's request. *A true and correct copy of Riskin's two June*
6 *24, 2018 emails to Respondent are attached as Exhibit C.*

7 15. On July 24, 2018, Riskin forwarded his request to Dr. Clyde Oden, Respondent's
8 Chief Financial Officer as registered with the Secretary of State, at
9 drclydewodenjr@bryanttemple.org. Riskin noted in his email that Respondent had not provided any
10 response to his request for public records and had failed to respond to his request within 10 days of
11 receipt as required by law. *See* § 6253(c). Again, Respondent provided no response to Riskin's
12 request. *A true and correct copy of Riskin's July 24, 2018 email to Respondent is attached as*
13 *Exhibit D.*

14 16. Rather than proceeding directly to litigation, on August 22, 2018, Riskin contacted
15 Respondent by telephone at its public-facing telephone number to inquire about the status of his
16 unanswered request. He spoke with Phyllis Parker, who told him that Ramsey handled all public
17 records requests and advised that he call Ramsey directly. Riskin called Ramsey's extension, and
18 the call was routed to her voicemail. Riskin left a voicemail message in which he identified himself
19 and inquired about the status of his unanswered request. Yet again, Respondent provided no
20 response to Riskin's request.

21 17. Rather than proceeding directly to litigation, on September 4, 2018, Riskin sent a
22 copy of his public records request to Ramsey via certified mail. By then, Ramsey had replaced
23 Shockley as Respondent's agent for service of process, and Riskin mailed the request to the service
24 address listed with the Secretary of State. Ramsey personally signed for the letter upon its delivery.
25 Nevertheless, Respondent again provided no response to Riskin's request. *A true and correct copy*
26 *of the certified return receipt for Riskin's request signed by Ramsey is attached as Exhibit E.*

27 _____
28 ³ Respondent received an automated email response that his email to b.shockley@communitybuild.org was returned as undeliverable. However, Respondent's emails to Shockley at bshock8402@aol.com and Brenda.shockley@lacity.org appear to have been delivered successfully.

1 18. In sum, Riskin contacted Respondent via email, telephone, and certified mail,
2 pursuing every point of contact he could locate over the course of many months to attempt to induce
3 Respondent to comply with California law and respond to his request for public records. Despite
4 Riskin’s repeated communications through multiple points of contact and various attempts to avoid
5 litigation, Respondent has failed to respond in any way whatsoever to Riskin’s CPRA request—let
6 alone within 10 days as required by statute. *See* § 6253(c). In the nearly six months since Riskin
7 first submitted his request, Respondent has ignored Riskin entirely and failed to provide even one
8 responsive record. Respondent has thereby violated the CPRA.

9 **Records responsive to Riskin’s requests exist, demonstrating that Respondent is**
10 **unlawfully withholding public records**

11 19. Information obtained through other CPRA requests demonstrates that records
12 responsive to Riskin’s request exist and are therefore clearly being withheld by Respondent.

13 20. As one example, Riskin’s request asked in part for all emails between (defined as
14 “to/from/cc/bcc”) anyone on the BID Board or staff and anyone at the domain lacity.org from
15 January 1, 2017 to the date of Respondent’s compliance with the request. Riskin is in possession of
16 an email from Respondent’s Senior Administrative Assistant, Phyllis Parker, to a group of
17 recipients including Ramsey, BID Board Members (including Ben Caldwell, Fred Calloway, Alan
18 DiCastro, Curtis Franlin, and Jamila Veasley), and Rita Moreno at an lacity.org email domain. The
19 email invites recipients to attend a committee meeting for the proposed renewal and expansion of
20 the BID. The email was sent on October 16, 2017—within the timeframe of the request. This record
21 is clearly responsive to Riskin’s request. *A true and accurate copy of this email is attached as*
22 *Exhibit F.*

23 21. As another example, Riskin is in possession of an email exchange between Ramsey
24 and Rita Moreno at an lacity.org email domain. In the exchange, Ramsey requests a disbursement
25 availability notice to the BID for payments from government and public agencies; she notes that
26 “city payments have been made but not reflected on the most recent report.” The exchange was sent
27 on May 1, 2017 and May 2, 2017, within the timeframe of Riskin’s request. These records are
28 clearly responsive to Riskin’s request. *A true and accurate copy of this email exchange is attached*

1 as Exhibit G.

2 22. Although records responsive to Riskin’s request clearly exist, Respondent withheld
3 all such records. Respondent thereby maintains these records in complete secrecy, thereby
4 frustrating the democratic process and violating the CPRA.

5 **Factual Summary**

6 23. Respondent has repeatedly and as a matter of course violated the CPRA. Respondent
7 has failed to make any determination as to whether Riskin’s requests were for disclosable records in
8 the BID’s possession, let alone to do so within the 10-day statutory deadline. *See* § 6253(c).
9 Respondent has failed to provide an estimated date by which the requested records would be made
10 available, let alone to do so within the 10-day statutory deadline. *Id.* Most notably, Respondent has
11 failed to provide even a single requested record to Riskin, let alone to do so “promptly” as required
12 by law. *See* § 6253(b).

13 24. Respondent’s pattern and practice of failing to produce public records in response to
14 requests—and, in fact, ignoring requests entirely—effectively makes secret the operations of the
15 BID and shields Respondent from public accountability. Particularly given the BID’s attempts to
16 expand its geographic scope in 2019 and the rapid gentrification in the area, the public interest in
17 the requested public records is great. Judicial action is therefore necessary to enforce the
18 requirements of the CPRA against Respondent.

19 **FIRST CAUSE OF ACTION:**
20 **PETITION FOR WRIT OF MANDATE PURSUANT TO THE CALIFORNIA PUBLIC**
21 **RECORDS ACT, GOV’T CODE § 6250, et seq.**

22 25. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 24
23 above, as if set forth in full.

24 **General principles of the California Public Records Act**

25 26. Under the California Public Records Act, § 6250 *et seq.*, all records that are
26 prepared, owned, used, or retained by any public agency and that are not subject to the CPRA’s
27 statutory exemptions to disclosure must be made publicly available for inspection and copying upon
28 request. §§ 6253(a)-(b).

29 27. When a member of the public submits a record request to an agency, the agency is

1 access to the records or information sought.” *Id.*

2 33. Whenever it is made to appear by verified petition to the Superior Court of the
3 county where the records or some part thereof are situated that certain public records are being
4 improperly withheld from a member of the public, the Court shall order the officer or person
5 charged with withholding the records to disclose the public record or show cause why he or she
6 should not do so. The Court shall decide the case after examining the record in camera (if permitted
7 by the Evidence Code), papers filed by the parties, and any oral argument and additional evidence
8 as the Court may allow. § 6259(a). If the Court finds that the failure to disclose is not justified, it
9 shall order the public official to make the record public. § 6259(b).

10 34. A petitioner prevails under the CPRA where the petitioner shows that an agency
11 unlawfully denied access to records. *Community Youth Athletic Center v. City of National City*, 220
12 Cal.App.4th 1385, 1446-1447 (2013). An agency is not protected from liability merely because the
13 denial of access was due to the agency’s internal logistical problems or general neglect of its duties.
14 *Id.*

15 35. Public policy favors judicial enforcement of the CPRA. The CPRA contains a
16 mandatory attorneys’ fee provision for the prevailing plaintiff. § 6259(d). The purpose of the
17 provision is to provide “protections and incentives for members of the public to seek judicial
18 enforcement of their right to inspect public records subject to disclosure.” *Filarsky v. Super. Ct.*, 28
19 Cal.4th 419, 427 (2002).

20 36. Here, Respondent repeatedly violated the CPRA by denying Petitioner any access to
21 all public records he requested. The public records that Petitioner requested are not properly subject
22 to any of the CPRA’s statutory exemptions, nor did Respondent cite any exemptions to justify its
23 nondisclosure. Respondent therefore acted unlawfully in contravening its duty to make such records
24 available.

25 **Respondent unlawfully denied access to Petitioner’s requested public records**

26 37. Petitioner submitted a request for straightforward, easy-to-produce records that
27 would shed light on the BID’s operations in the rapidly-gentrifying Leimert Park area. Respondent
28

1 denied all access to these public records through its pattern and practice of non-response.

2 Respondent failed to indicate whether it conducted a search for those requested records. Respondent
3 failed to make a determination as to whether those requested records were disclosable. Respondent
4 failed to provide an estimate as to when those requested records would be produced. Respondent
5 failed to state under which exemptions, if any, it was withholding records. And most notably,
6 Respondent failed to provide any public records in response to Petitioner's request, despite
7 Petitioner's repeated follow-up communications through various points of contact regarding the
8 request. To date, it has been nearly six months since Riskin first submitted his request. By failing to
9 produce even one of the requested public records, Respondent is maintaining in a shroud of secrecy
10 records related to the BID's political activity and communications.
11

12 38. Respondent's denial of access and its failure to even communicate with Petitioner
13 regarding his request not only violates the letter of the CPRA, but also its spirit. The CPRA is
14 predicated on the principle that:

15 Openness in government is essential to the functioning of democracy. Implicit in
16 the democratic process is the notion that government should be accountable for its
17 actions. In order to verify accountability, individuals must have access to
18 government files. Such access permits checks against the arbitrary exercise of
19 official power and secrecy in the political process.

20 *Int'l Fed. Of Professional and Technical Engineers, Local 21, AFL-CIO v. Super. Ct.*, 42 Cal.4th
21 319, 328-39 (2007) (internal quotations omitted). By repeatedly failing to respond to requests for
22 such long periods of time, Respondent denies the public access to vital public information, and it
23 withholds access to records while they are current and most relevant to the public interest. In so
24 doing, Respondent shields itself from public scrutiny and disrupts the democratic process.

25 39. The CPRA is one of the only tools the public possesses for transparency and
26 accountability over BIDs. Public access to records through the CPRA sheds light on the BID's
27 political activity and its operation outside the public eye. By withholding all requested information,
28 Respondent is shielding from disclosure information that could reveal BID actions of significant
public concern. As such, Respondent's clear violations of the CPRA require judicial intervention.

1 **A WRIT OF MANDATE AND DECLARATORY RELIEF ARE APPROPRIATE**

2 40. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 39
3 above, as if set forth in full.

4 41. Petitioner is entitled to seek a writ of mandate and declaratory relief in response to
5 violation of the CPRA. § 6258. Petitioner has no plain, speedy, adequate remedy in the ordinary
6 course of law other than the relief sought in this petition. *See* Code of Civil Procedure § 1086.31.

7 42. Respondent has a clear, present, ministerial duty to comply with Gov't Code
8 §§ 6250, *et seq.* Respondent has repeatedly acted and continues to act in violation of the CPRA by
9 maintaining a pattern and practice of denial of access to public information through impermissible
10 delay, non-responsiveness, and indiscriminately withholding all records from the public. § 6253(b),
11 (d).

12 43. Petitioner has performed all conditions precedent to filing this petition. There are no
13 administrative exhaustion requirements under Government Code § 6250, *et seq.*

14 44. An actual controversy exists between the parties concerning whether Respondent has
15 engaged in conduct that violates the statutory requirements of the CPRA. A judicial determination
16 to resolve this actual controversy is necessary and appropriate at this time.


17 **PRAYER FOR RELIEF**

18 WHEREFORE, Petitioner prays for judgment as follows:

- 19
- 20 1. For issuance of a writ of mandate directing Respondent to provide Petitioner with all
21 requested records, except those records that the Court determines may lawfully be
22 withheld;
 - 23 2. For a declaration that Respondent's conduct, policies, and pattern and practice of
24 denying access to public records violates the CPRA;
 - 25 3. For Petitioner to be awarded reasonable attorneys' fees and costs; and
 - 26 4. For such other and further relief as the Court deems proper and just.
- 27
28

1 Dated: 11/21/18

Respectfully submitted,

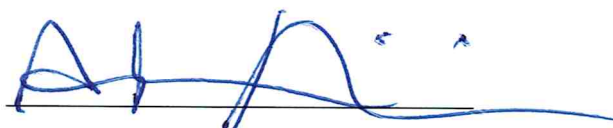
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ANNA VON HERRMANN
Attorney for Petitioner and Plaintiff

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VERIFICATION

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2 I, ADRIAN RISKIN, am the Petitioner and Plaintiff in this action. I have read the foregoing
3 Petition for Writ of Mandate and Complaint for Declaratory Relief, and I know the contents thereof.
4 The same is true of my own knowledge, except as to those matters which are therein alleged on
5 information and belief, and, as to those matters, I also believe them to be true.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct. Executed on this the 22nd day of November, 2018 in Los Angeles
8 California.

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12 ADRIAN RISKIN
13 Petitioner and Plaintiff
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INDEX OF EXHIBITS

EXHIBIT A: True and accurate copy of Petitioner's June 5, 2018 email to Respondent

EXHIBIT B: True and accurate copy of Petitioner's June 20, 2018 email to Respondent

EXHIBIT C: True and accurate copies of Petitioner's June 24, 2018 emails to Respondent

EXHIBIT D: True and accurate copy of Petitioner's July 24, 2018 email to Respondent

EXHIBIT E: True and accurate copy of the certified mail return receipt, signed by Kimberly Ramsey, for the public records request that Petitioner mailed to Respondent on September 4, 2018

EXHIBIT F: True and accurate copy of email sent by Phyllis Parker, which is responsive to Petitioner's public records request

EXHIBIT G: True and accurate copy of email exchange between Kimberly Ramsey and Rita Moreno, which is responsive to Petitioner's public records request

EXHIBIT A

Subject: CPRA request (GLPVBID.2018.06.05.a)
From: adrian@internet-mail.org
Date: 06/05/2018 02:16 PM
To: kramsey@communitybuild.org, info@villagecorridorbid.org

Dear Ms. Ramsey,

I would like to see copies of all emails between anyone on the GLPV BID board or staff and anyone at any of the domains:

- a. hollywoodbid.org
- b. ccala.org
- c. historiccore.bid
- d. downtownla.com
- e. centralcityeast.org
- f. devine-strategies.com
- g. lapd.online
- h. lacity.org
- i. urbandesigncenter.com
- j. centralavenuehistoricdistrict.org
- k. urbanplaceconsulting.com
- l. lasd.org
- m. venicebeachbid.com

Also any emails in the possession of anyone on the GLPV BID Board or staff which contain any of the following search terms:

1. Bacon
2. Feuer
3. Nijjar
4. Chesapeake

I need to see these emails from January 1, 2017 through date of compliance.

Finally, I notice that the GLPV BID is in the process of renewing. I would also like to obtain electronic copies of the BID's contract with its renewal consultant if there is one, along with all invoices submitted by the consultant to the BID for the present renewal process and all emails between anyone at the BID and anyone at the consultant related to the present renewal process.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, or MBOX. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within the deadline mandated by the CPRA.

Adrian Riskin

EXHIBIT B

Subject: Re: CPRA request (GLPVBID.2018.06.05.a)
From: adrian@internet-mail.org
Date: 06/20/2018 08:22 AM
To: kramsey@communitybuild.org, info@villagecorridorbid.org

Good morning Ms. Ramsey,

I wonder if you can tell me the status of this request? A response was due last Friday.

Thanks,

Adrian

On Tue, Jun 5, 2018, at 2:16 PM, adrian@internet-mail.org wrote:

Dear Ms. Ramsey,

I would like to see copies of all emails between anyone on the GLPV BID board or staff and anyone at any of the domains:

- a. hollywoodbid.org
- b. ccala.org
- c. historiccore.bid
- d. downtownla.com
- e. centralcityeast.org
- f. devine-strategies.com
- g. lapd.online
- h. lacity.org
- i. urbandesigncenter.com
- j. centralavenuehistoricdistrict.org
- k. urbanplaceconsulting.com
- l. lasd.org
- m. venicebeachbid.com

Also any emails in the possession of anyone on the GLPV BID Board or staff which contain any of the following search terms:

1. Bacon
2. Feuer
3. Nijjar
4. Chesapeake

I need to see these emails from January 1, 2017 through date of compliance.

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Finally, please note that a version of a given email in one mailbox is

distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within the deadline mandated by the CPRA.

Adrian Riskin

EXHIBIT C

Subject: Re: CPRA request (GLPVBID.2018.06.05.a)
From: adrian@internet-mail.org
Date: 06/24/2018 12:59 PM
To: info@communitybuild.org, b.shockley@communitybuild.org, bshock8402@aol.com
CC: kramsey@communitybuild.org, info@villagecorridorbid.org, pparker@communitybuild.org

Hi Ms. Shockley,

I'm forwarding this CPRA request to you to make sure someone at the BID or its POA has received it. Since you're listed as Community Build's agent for service of process with the state of California perhaps you're also an official contact for this kind of thing.

thanks for your help, everyone.

Adrian

On Wed, Jun 20, 2018, at 8:22 AM, adrian@internet-mail.org wrote:

Good morning Ms. Ramsey,

I wonder if you can tell me the status of this request? A response was due last Friday.

Thanks,

Adrian

On Tue, Jun 5, 2018, at 2:16 PM, adrian@internet-mail.org wrote:

Dear Ms. Ramsey,

I would like to see copies of all emails between anyone on the GLPV BID board or staff and anyone at any of the domains:

- a. hollywoodbid.org
- b. ccala.org
- c. historiccore.bid
- d. downtownla.com
- e. centralcityeast.org
- f. devine-strategies.com
- g. lapd.online
- h. lacity.org
- i. urbandesigncenter.com
- j. centralavenuehistoricdistrict.org
- k. urbanplaceconsulting.com
- l. lasd.org
- m. venicebeachbid.com

Also any emails in the possession of anyone on the GLPV BID Board or staff which contain any of the following search terms:

1. Bacon
2. Feuer
3. Nijjar
4. Chesapeake

I need to see these emails from January 1, 2017 through date of compliance.

Finally, I notice that the GLPV BID is in the process of renewing. I would also like to obtain electronic copies of the BID's contract with its renewal consultant if there is one, along with all invoices submitted by the consultant to the BID for the present renewal process and all emails between anyone at the BID and anyone at the consultant related to the present renewal process.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, or MBOX. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within the deadline mandated by the CPRA.

Adrian Riskin

Subject: Re: CPRA request (GLPVBID.2018.06.05.a)
From: adrian@internet-mail.org
Date: 06/24/2018 01:06 PM
To: brenda.shockley@lacity.org

Hi Ms. Shockley,

I'm forwarding this CPRA request to you to make sure someone at the BID or its POA has received it. Since you're listed as Community Build's agent for service of process with the state of California perhaps you're also an official contact for this kind of thing.

thanks for your help, everyone.

Adrian

On Wed, Jun 20, 2018, at 8:22 AM, adrian@internet-mail.org wrote:

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I wonder if you can tell me the status of this request? A response was due last Friday.

Thanks,

Adrian

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Thank you for your anticipated cooperation, and I look forward to hearing from you within the deadline mandated by the CPRA.

Adrian Riskin

EXHIBIT D

Subject: Fwd: Re: CPRA request (GLPVBID.2018.06.05.a)
From: adrian@mailworks.org
Date: 07/24/2018 09:49 AM
To: drclydewodenjr@bryanttemple.org

Good morning, Dr. Oden.

I'm sorry to bother you at this email account, but I'm forwarding this request to the Greater Leimert Park Village BID to you because you're listed with the Secretary of State as the CFO of the BID's property owners' association, Community Build. I haven't received responses from Ms. Ramsey or Ms. Shockley and I want to make sure that someone at the BID has received the request. It's almost two months old at this point and a response is required after ten days.

Thanks so much for your help, and again, I'm sorry to bother you at this email address.

Thanks,

Adrian Riskin

----- Original message -----

From: adrian@internet-mail.org
To: brenda.shockley@lacity.org
Subject: Re: CPRA request (GLPVBID.2018.06.05.a)
Date: Sun, 24 Jun 2018 13:06:38 -0700

Hi Ms. Shockley,

I'm forwarding this CPRA request to you to make sure someone at the BID or its POA has received it. Since you're listed as Community Build's agent for service of process with the state of California perhaps you're also an official contact for this kind of thing.

thanks for your help, everyone.

Adrian

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I wonder if you can tell me the status of this request? A response was due last Friday.

Thanks,

Adrian

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Thank you for your anticipated cooperation, and I look forward to hearing from you within the deadline mandated by the CPRA.

Adrian Riskin

EXHIBIT E

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

K. Ramsey
Community Bldg
4305 Dequan Blvd
Ste. 102
Los Angeles, CA 90008



9590 9402 2896 7094 6340 68

2. Article Number (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

Kimberly Ram

D. Is delivery address different from the address on the label?
If YES, enter delivery address

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

EXHIBIT F



Rita Moreno <rita.moreno@lacity.org>

Invitation to Attend Committee Meeting for the Renewal of the Greater Leimert Park Village/Crenshaw Corridor Business Improvement District

6 messages

Phyllis Parker <pparker@communitybuild.org> Mon, Oct 16, 2017 at 11:43 AM
To: "2fredcall@gmail.com" <2fredcall@gmail.com>, "Bencaldwellfilm@aol.com" <Bencaldwellfilm@aol.com>, "curtis@infinityredevelopment.com" <curtis@infinityredevelopment.com>, Allan <allan@artandpractice.org>, "ckg200290230@yahoo.com" <ckg200290230@yahoo.com>, Rita Moreno <rita.moreno@lacity.org>, "jamila.veasley@kp.org" <jamila.veasley@kp.org>, "velasquezn@metro.net" <velasquezn@metro.net>, "jwheeler@fredleedsproperties.com" <jwheeler@fredleedsproperties.com>, "erwin.lwdt@gmail.com" <erwin.lwdt@gmail.com>
Cc: Kimberly Ramsey <kramsey@communitybuild.org>, Sherri Franklin <sherri@urbandesigncenter.com>, Griffin Wright <griffin@urbandesigncenter.com>

You are cordially invited to attend the second committee meeting for the proposed renewal and expansion of the Greater Leimert Park Village/Crenshaw Corridor Business Improvement District (GLPVCCBID):

Date: Thursday, October 19, 2017
Time: 12:00 pm - 1:30 pm
Location: Office of Fred Leeds Properties
3860 Crenshaw Blvd., Suite 201
Los Angeles, CA 90008

See attached invitation.

Phyllis Parker
Sr. Administrative Assistant
Community Build, Inc.
4305 Degnan Blvd., Suite 102
Los Angeles, CA 90008
(323) 290-6560 x533 office
(323) 596-9036 fax

EXHIBIT G



Rita Moreno <rita.moreno@lacity.org>

FW: Government and Public Agencies Report April 2017

Kimberly Ramsey <kramsey@communitybuild.org>

Tue, May 2, 2017 at 1:25 PM

To: Rita Moreno <rita.moreno@lacity.org>

Cc: Phyllis Parker <pparker@communitybuild.org>, Yannis Oliver <yoliver@communitybuild.org>

Thank you. This is very critical to BID operations.

--Kim

From: Rita Moreno [mailto:rita.moreno@lacity.org]

Sent: Tuesday, May 02, 2017 1:00 PM

To: Kimberly Ramsey <kramsey@communitybuild.org>

Cc: Phyllis Parker <pparker@communitybuild.org>; Yannis Oliver <yoliver@communitybuild.org>

Subject: Re: FW: Government and Public Agencies Report April 2017

Okay, I've inquired and will let you know.

On Mon, May 1, 2017 at 1:34 PM, Kimberly Ramsey <kramsey@communitybuild.org> wrote:

Good Afternoon Rita,

I hope you are well. I am writing to request a disbursement availability notice to the Greater Leimert Park Village Crenshaw Corridor Business Improvement Districts for payments from government and public agencies. Based on investigation by Cristina, City payments have been made but not reflected on the most recent report. Can you please inquire with the Accountants? Typically these payments are made during the first quarter, which allows operation during quarter 2. Thank you.

Respectfully,

Kim

Kimberly Ramsey

Interim President / CEO

Community Build, Inc.

323-652-2018

From: Cristina Flores [mailto:cristina.flores@lacity.org]

Sent: Monday, April 17, 2017 1:28 PM

To: Kimberly Ramsey <kramsey@communitybuild.org>; bshock8402@aol.com

Subject: Government and Public Agencies Report April 2017