S263734

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

HILL RHF HOUSING PARTNERS, L.P., et al,

Petitioners and Appellants,

v.

CITY OF LOS ANGELES et al.,

Objectors and Respondents.

After a Decision by the Court of Appeal,
Second Appellate District, Division One
(Nos. B295181 and B295315; Super. Ct. L.A. County, Nos. BS170127 and BS170352)

ANSWER TO PETITION FOR REVIEW

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CERTIFICATE OF INTERESTED PARTIES

Pursuant to California Rule of Court 8.208, Appellee and Respondent the City of Los Angeles makes the following disclosure regarding persons or entities having a financial or other interest in the outcome of the proceeding that the justices should consider in determining whether to disqualify themselves: There are no interested persons or entities who must be identified pursuant to Rule 8.208.

Dated: Aug. 24 2020

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Respondent City of Los Angeles (the "City") respectfully urges this Court to deny the Petition for Review ("Petition") filed by Petitioners and Appellants Hill RHF Housing Partners, LP, et al., ("Appellants"). The Petition challenges an opinion ("Opinion") of the Second Appellate District, certified for publication on June 29, 2020.

The Opinion addresses two cases challenging the formation of two Business Improvement Districts ("BIDs"), the San Pedro Historic Waterfront BID ("SPBID") and the Downtown Center BID ("DCBID"), created through Section (4), Article XIII D, of the California Constitution ("Article XIII D"). The Trial Court ruled against Appellants and held that the BIDs satisfied Article XIII D. The Second District Court of Appeal affirmed, holding that the Trial Court lacked jurisdiction to consider Appellant's claims because Appellants failed to exhaust administrative remedies.

The Petition raises only one reviewable issue, whether the Opinion properly found that Appellants failed to exhaust administrative remedies by submitting ballots against the formation of the SPBID and the DCBID ("no" ballots). Here the Opinion is not controversial. If the Assessment Hearing offers an adequate administrative remedy, no authority appears to find that submitting a "no" ballot would exhaust that remedy. (*See Williams & Fickett v. County of Fresno* (2017) 2 Cal.5th 1258, 1273 ("*Williams and*

Fickett").)

The Petition also asks this Court to review whether Article XIII D and Government Code XIII D impose an "administrative exhaustion requirement." But Appellants below never contested that the noticed hearing provided by section (4)(e) of Article XIII D and Government Code § 53753 (the "Assessment Hearing") offers an adequate administrative remedy. (Reply at 35-39.) Appellants argued instead that they completely exhausted this remedy by submitting "no" ballots. (Reply at 35 and 39.) This Court should not review a matter not raised or argued by Appellants. (Rule 8.500(c)(1).)

Nor does the Petition offer any reason to review whether an Assessment Hearing is an adequate administrative remedy. Although the Opinion is the first to require exhaustion of the administrative remedies offered by an Assessment Hearing: (1) The Opinion follows well-established principles recently applied by this Court; (2) This Court appears to have already resolved when an administrative remedy requires exhaustion prior through the analysis in *Plantier v. Ramona Municipal Water Dist.* (2019) 7 Cal. 5th 372, 386; and (3) No court reaches a result differing from the Opinion or applies different reasoning or legal principles. Appellants point to cases that did not consider the issue, but "[c]ases are not authority for propositions not considered." (*Siskiyou County Farm Bureau v. Department of Fish & Wildlife* (2015) 237 Cal. App. 4th 411, 437 fn. 11.)

The Assessment Hearing offers virtually the same administrative remedy for assessments as those for which the courts traditionally require exhaustion prior to judicial review. Just as for other administrative challenges to assessments, the City was required to offer a noticed hearing at which it would "consider" any "objections" and "protests" to

the assessments that would fund the BIDs. The City had the power to address any objections. The Assessment Hearing thus differs radically from the hearings in *Plantier,* which "[f]undamentally, [. . .] were inadequate because **they did not allow the District to resolve plaintiff's particular dispute**." (*Plantier* at 387 (*emphasis added.*) The Assessment Hearings are not inadequate; they provide a complete and comprehensive administrative remedy. Reviewing the Opinion thus would not resolve conflicts regarding important issues but would instead cast into doubt all administrative exhaustion requirements for assessments, based on arguments and a record undeveloped by Appellants.

Amicus offers little but blatant misstatements and wishful thinking. Amicus misleadingly argues *Plantier* held that "no administrative remedy could be added to a Proposition 218," **explicitly not** *Plantier's* holding. (*See* Amicus Letter at 4; *compare Plantier* at 384.) Amicus pretends that this case presents a conflict between the judicial and legislative branches, **ignoring completely that the judiciary created this exhaustion requirement**. (*See* Amicus letter at 3.) Similarly, Amicus imagines that Article XIII D explicitly forbids any procedural requirements other than the submission of "yes" and "no" ballots, **ignoring completely the actual language of Article XIII D.** (*See* Amicus at 2.) Amicus offers only political statements, nothing useful or relevant to review of this matter.

The Petition raises two other issues (whether these BIDs were constitutional under Article XIII D and whether Article XIII D rendered some implementation statutes unconstitutional) not addressed in the Opinion that should not be reviewed now. (*See*

Opinion at 4; California Rule of Court 8.500(b).) The remaining issue, whether to follow the general rule that judicial decisions apply retroactively, was not raised by Appellants until they sought rehearing of the Opinion. The Court should follow its policy not to review matters that were not timely raised in the lower courts. (California Rule of Court 8.500(c)(1).)

Review of the Opinion would create discord where none exists, and cause conflict and confusion where there is none. This Court should not disturb the Court of Appeal's well-reasoned decision. The Petition should be denied. (Cal. Rules of Court, rule 8.500(b)(1).)

II. BACKGROUND

Because the Opinion held that Appellants failed to exhaust administrative remedies, the only material facts here are:

1. In April and May of 2017 the City adopted ordinances declaring its intent to create the SPBID and the DCBID and impose assessments on properties within those BIDs. (Opinion at 4.)
2. On June 17, 2017, and June 27, 2017, the City held noticed Assessment Hearings regarding the assessments proposed against Appellants (and others) as part of the formation of the DCBID and the SPBID, respectively. (Opinion at 5.)
3. Appellants submitted timely "no" ballots against each BID. (Opinion at 4.)
4. Neither Appellants nor any other person presented any objections, concerns, or challenges relating to a failure to comply with Article XIII D at either hearing. (Opinion at 5.)

5. Appellants filed Petitions for Writ of Mandate challenging the establishment of the SPBID and DCBID, arguing that the assessments violated Article XIII D. (Opinion at 6.)

The City must clarify the issues Appellants raised and argued below. Petitioners did not argue that the Opinion's exhaustion requirement should apply only prospectively. (Reply at 35-39.) Appellants did not argue that Article XIII D prohibited the legislature from providing an adequate remedy through Section 53753. (Reply at 36-37.) Appellants did not argue that they lacked an adequate administrative remedy. (Reply at 39.) Appellants did not even address administration exhaustion until filing their Reply. (Opening Brief, *passim.*)

III. OPPOSITION TO PETITION FOR REVIEW

To the extent Appellants seek review of issues raised and considered by the Court of Appeal, the Opinion properly applies this Court's recently clarified authority regarding administrative remedies. Appellants never contested that the Assessment Hearing provided an adequate legal remedy. This left the Court of Appeal only the issue of whether, having an adequate administrative remedy, Appellants had exhausted it.

The Appellate Court had little recourse but to hold that Appellants failed to exhaust that remedy by filing "no" ballots. (*Williams and Fickett* at 1273.) Simply saying "I do not want to pay an assessment" would not exhaust any adequate administrative remedy under any line of authority. Because no other reviewable issues were timely raised below, review should be denied. (Rule 8.5000(c)(1).)

Nor would any existing authorities find that an Assessment Hearing does not provide an adequate administrative remedy. The Assessment Hearing is like any other

administrative remedy to challenge an assessment. Appellants claim to seek "consistency," but the courts consistently find that such remedies must be exhausted.

The other three issues are not remotely within this Court's policy for granting review. Appellants seek review of issues that **were not timely raised** and/or **not reached** by the Court of Appeal.

The City respectfully urges that review be denied.

A. THE OPINION APPLIES CONSISTENT AUTHORITIES THAT WOULD REQUIRE ADMINISTRATIVE EXHAUSTION HERE.

Even had Appellants timely raised whether they were provided an adequate administrative remedy they provide no reason for this Court to review the issue. Appellants fail to show any conflict or lack of uniformity in the lower courts. Appellants instead cite to a handful of courts that **did not consider the issue**, which proves nothing. (*Siskiyou County*, 237 Cal. App. 4th at 437 fn. 11.)

Nor do Appellants consider the extent to which the Opinion is consistent with other opinions. The Assessment Hearing offers the same administrative review offered by all assessment remedies. The assessee has notice that an assessment is proposed and that the City will hold an Assessment Hearing to consider those assessments. (Opinion at 4.) At the Assessment Hearing the government then must consider objections to the proposed assessment and has the power to change the proposed assessments in any way. (Article XIII D and Section 53753.)

The Assessment Hearing offers substantially the same remedy as dozens of other similar procedures addressing assessments and taxes for which California has long

required the exhaustion of administrative remedies. Nothing in Article XIII D prohibits administrative remedies or their exhaustion. There is no reason to review the Opinion.

1. An Assessment Hearing Offers An Administrative Remedy That Must Be Exhausted.

The courts without dissent hold that before seeking judicial review a litigant must exhaust an administrative remedy which: (1) offers a reasonable method for objections to be heard; and (2) empowers the government to act on those objections. (*See Wallich's Ranch Co. v. Kern County Citrus Pest Control Dist.* (2001) 87 Cal. App. 4th 878, 885; *Plantier* at 387-388.) A litigant must exhaust administrative remedies unless the remedy **does not** give the government "the authority to . . . make any necessary changes in response to protests." (*See Plantier* at 386.)

Plantier's analysis appears to have completely resolved when an assessment hearing offers an adequate administrative remedy. In *Plantier* the plaintiffs challenged the methodology for a wastewater service charge under Article XIII D, section (6). (*Plantier* at 378-379.) The wastewater district argued that the plaintiffs were required to challenge the assessment methodology at a public hearing "that addresses only a proposed *rate* increase." (*Id.* at 376.) But "an agency seeking to increase the rate at a Proposition 218 hearing has no authority to resolve methodological challenges or to modify the fee structure." (*Id.*) Because the rate increase hearing could not have addressed assessment methodology, the hearing could not provide an adequate administrative remedy to challenge assessment methodology. (*Id.* at 389.)

An Assessment Hearing on the other hand **offers an adequate administrative**

remedy. (*See Plantier* at 389; *Wallich's Ranch* at 885.) A remedy must be exhausted when it requires the government to consider objections and offers "an opportunity to address the perceived problems and formulate a resolution." (*Wallich's Ranch* at 885.)

The Assessment Hearing clearly does so. The City **must provide notice of the proposed assessment** to fund a BID. (Article XIII D, section (4)(c) ("[T]he record owner of each parcel shall be given written notice by mail of the proposed assessment. . . .").) At a noticed hearing the City "**shall consider all objections or protests**, if any, **to the proposed assessment**." (Government Code § 53753(d); *see* Article XIII D, subsection (4)(e) (*emphasis added.*) After "considering all objections" the City can "adopt, revise, change, reduce, or modify the proposed assessments." (Streets and Highways Code § 36624 (*emphasis added*); *see* Article XIII D, subsection (4)(e).) The City must provide notice of any assessments that will be made after the hearing. (Streets & Highway Code §§ 3110, 3114, and 36627.)

The requirement to "consider all protests . . . at a Proposition 218 hearing compels an agency to not only receive written protests and hear oral ones, but to take all protests into account when deciding whether to approve" the proposed action. (*Plantier* at 386.) Article XIII D and Section 53753 both require the City to evaluate and review all objections to the assessments to fund the BIDs, not just to tabulate ballots as argued by Appellants.

Based on *Williams and Fickett* and *Plantier* the Assessment Hearing provided Appellants with an adequate administrative remedy that must be exhausted prior to filing suit. This remedy is virtually identical to dozens of other administrative remedies for

challenging assessments and exhaustion should be required.

Amicus argues that review is needed because *Plantier* held "no administrative remedy could be added to Proposition 218," but this purported "holding" arises out of thin air. *Plantier* instead expressed "no view on the broader question of whether a Proposition 218 hearing could ever be considered an administrative remedy that must be exhausted. . . ." (*Plantier* at 388.)

The Opinion implicitly addressed *Plantier's* actual holding, noting that the BID process "gives the city *discretion* to pass or decline an assessment even if property owners' votes are sufficient to sustain the assessment." (Opinion at 14-15.) *Plantier* held that an administrative remedy need not be exhausted if the government "has no authority to resolve" the objections, and this is addressed in the Opinion. (*Plantier* at 389; Opinion at 14-15.) *Plantier* leaves nothing to explore here.

2. Article XIII D Does Not Prohibit The Courts Or The Legislature From Requiring Exhaustion Of Administrative Remedies.

Appellants argue not that they lacked an adequate remedy but that Article XIII D prevents the courts from applying an exhaustion requirement beyond submitting a "no" ballot. (Reply at 35-37.) But the courts, the California Constitution, and the Legislature have all emphasized the importance of administrative exhaustion for assessments, the lifeblood of government. (*See, e.g., Harmony Gold U.S.A., Inc. v. County of Los Angeles* (2019) 31 Cal. App. 5th 820, 836.) When Proposition 218 intended to alter long-standing legal principles that protect vital government finances it did so explicitly, such as with shifting the burden of proof to the government. (*See, e.g.,* Subsection (4)(f) of Article

XIII D.)

Article XIII D surely did not intend to abolish these long-standing, vital principles regarding government finance **silently**, without a word explaining this intent. Absent explicit language in Subsection (4)(f) it is hard to believe Article XIII D intended to make assessments "harder" by shifting the burden of proof to the government. Following this line of reasoning would require Article XIII D to abolish any and all procedural requirements that make it "harder" for one to challenge assessments. This argument requires no further consideration.

Amicus, on the other hand, argues that because Article XIII D "never imposes a burden of proof on property owners to establish" that an assessment is unconstitutional, Article XIII D prohibits any exhaustion requirement. But the Opinion never requires an objector to "establish" or "prove" that an assessment is unconstitutional. It merely requires that the objection specify concerns in some intelligible manner. The government would still have the burden of proof in litigation, as required by Subsection (4)(f) of Article XIII D.

Finally, Amicus irrelevantly argues that review is necessary to ensure that "the judiciary, not the legislature, is interpreting the Constitution," ignoring that this would be a judicially-created exhaustion requirement.

And no judicial/legislative conflict arises even if the requirement was imposed by the legislature. The courts traditionally defer to legislative interpretations of ambiguous constitutional provisions, particularly for procedural matters. (*See Harmony Gold*, 31 Cal. App. 5th at 836.) Moreover, Section (4) of Article III D offers a hearing at which the

government must "consider" any "protest" to an assessment to fund a BID. If this does not explicitly provide for an administrative remedy it is surely ambiguous. (*See Plantier*, 7 Cal. 5th at 386 ("[A] Proposition 218 hearing compels an agency to not only receive written protests and hear oral ones, but to take all protests into account when deciding whether to approve the proposed fee. . . .")

There is no reason to believe further guidance on this issue is required. Review should not be granted.

3. Article XIII D Does Not Limit Appellant's Administrative Remedy To Casting A "No" Ballot.

Appellants also maintain that Article XIII D refers to "protests" and so prohibits any administrative remedy other than a "no" ballot. But this Court has already recognized that when Article XIII D refers to "protests" it could reasonably refer to more than just these "no" ballots. (*Plantier* at 877-878.) In any event Section 53753 requires the government to consider **"objections,"** not just "protests." Appellants had the right to "object" to and "protest" the BIDs, and the City had the obligation to consider those objections, at the establishment hearing.

4. Objections At An Assessment Hearing Provide An Administrative Remedy, Not Just An Opportunity To Comment On City Ordinances.

The Assessment Hearing is nothing like the normal open comment process for the consideration of ordinances. The Assessment Hearing offers **the assessee** a specifically noticed opportunity **to object to a proposed assessment,** not merely the right to comment on the passage of an ordinance. (Article XIII D, § 4(e); Section 53753.) The Assessment Hearing allows not just comment on an ordinance but a direct challenge to a

specific assessment.

On the other hand, when the City considers an ordinance to impose a tax no specific assessment is considered nor does any taxpayer have specific notice to appear. A taxpayer could comment (or object) to the tax ordinance, but the tax could not be assessed against the taxpayer as a result of that hearing. To the contrary, the tax could only be assessed later, through an entirely different administrative process begun after the tax ordinance was enacted. (*See, e.g.,* Los Angeles Municipal Code § 21.16.)

Nor can the government modify an assessment against a taxpayer after public comment on a tax ordinance. As in *Plantier,* it would be "completely serendipitous" if a taxpayer brought a challenge to the assessment of a tax at the same time a hearing was held on the whether the City should enact a tax ordinance. (*Plantier* at 388.)

Thus, an Assessment Hearing differs starkly from an ordinance hearing. If an objector claims at an Assessment Hearing that it should only be assessed 70% rather than 95% of the cost of services provided by a BID, the City can immediately modify the BID to assess only 70% of the costs. On the other hand, if a taxpayer claims that it should not pay a tax at a hearing to consider a tax ordinance, the City cannot provide any remedy to the taxpayer. The City can alter the ordinance to address concerns, but the City could not decide that the tax does not apply to that taxpayer. In the end the taxpayer must wait until the City later decides whether to assess the tax to challenge the assessment administratively.

If an Assessment Hearing does not provide an adequate administrative remedy no administrative assessment process could. In substance this is the same administrative

remedy provided for all tax assessments. (*See, e.g.,* Revenue and Tax Code § 19044(a) ("If a protest is filed the Franchise Tax Board shall reconsider the assessment of the deficiency and . . . shall grant the taxpayer . . . an oral hearing.").) The Assessment Hearing is not substantively different than other administrative remedies because the City Council, rather than the Franchise Tax Board, provides this administrative review.

Indeed, the Assessment Hearing appears virtually identical to the tax refund remedies for which exhaustion was originally created. (*See Williams and Fickett* at 1280.) At the time "county boards of supervisors performed the function of local boards of equalization." (*Id.* at 1280.) "As so constituted, these boards were sometimes criticized as having insufficient time and expertise to competently address assessment issues." (*Id.*) Nevertheless, a taxpayer was precluded from challenging a tax in court unless it had exhausted these administrative remedies. (*See Dawson v. County of Los Angeles* (1940) 15 Cal. 2d 77, 81 (Exhaustion required an objection "to the assessment before **the board of supervisors**. . . .")

Review of this issue would only create confusion where none exists.

5. The Administrative Review Process Is Amply Described In Article XIII D, (4)(e), And Section 53753.

There is no need to review the Opinion because of concerns regarding the form or methods of objecting. The Opinion holds that the objector need only present "the specific reasons for its objection . . . in a manner the agency can consider . . . . " (Opinion at 15.) In other words, any reasonable presentation of an objections suffices, a requirement any objector can easily satisfy. Nothing in the Opinion or any other authority requires the

formal taking of evidence, court reporters, or similar requirements.

Certainly "I don't want to pay this assessment" is not sufficient to exhaust administrative remedies regardless of how formal or informal an objection must be. The Court will have ample opportunity to address this issue further if conflicts arise regarding whether some objection beyond "nothing" satisfies the exhaustion requirement.

B. RETROACTIVITY WAS NOT RAISED TIMELY AND SHOULD NOT BE REVIEWED.

Judicial opinions in general apply retroactively. Appellants belatedly argued the Opinion only should apply prospectively based on *Williams & Fickett*. But Appellants failed to even mention this concern until after the Opinion was issued against them. (*See* Reply, pp. 34-39; Request for Reconsideration.) The City respectfully urges that this Court should follow its policy and not review this untimely matter.

Nor are Appellants correct on this issue. Appellants argue against retroactivity only because the exhaustion requirement purportedly is "new." But in *Williams and Fickett* the Court applied its holding prospectively not because the exhaustion requirement was "new," but because "unequivocal" language in prior judicial opinions would reasonably lead a taxpayer to believe it had no administrative remedy. (*See Williams and Fickett* at 1282.) Appellants point to no such judicial language here, instead pointing only to opinions in which this issue was not even considered.

Review should be denied.

C. THE APPELLATE COURT DID NOT RULE ON THE REMAINING ISSUES AND SO THEY SHOULD NOT BE REVIEWED.

The Opinion holds that Appellants failed to exhaust their administrative remedies and so could not seek judicial relief. It did not reach or address: (1) Whether the BIDs at issue met the proportionality requirements of Article XIII D; or (2) Whether the California legislature had the power to enact Streets and Highways Code sections 36601(e), 36601(h)(2) and 36615.5.

The City respectfully urges the Court to decline to review these issues even should the Court exercise its discretion to review the exhaustion issues. The Appellate Court should have the opportunity to consider these issues before any further action is taken by this Court.

Nor does it appear further review would be needed. The Superior Court (which did address these issues) applied and followed *Dahms v. Downtown Pomona Property & Business Improvement Dist.* (2009) 174 Cal. App. 4th 708, 725, *review denied* 2009 Cal. LEXIS 7710. When "assessments directly fund security services, streetscape maintenance services, and marketing and promotion services for the assessed parcels," the assessments fund only the cost of providing special benefits and can be assessed by the BID. (*Dahms,* 174 Cal.App.4th at 725 (*emphasis added*).)

The SPBID and DCBID, like the BID in *Dahms,* provide services directly to the assessed properties and provide a special benefit equal to the costs of the services provided directly to the assessed properties. The BIDs only assess for the costs of that special benefit, i.e., the cost of services provided directly to assessed properties. The SPBID and the DCBID both find that some services would be provided generally and do not assess for the cost of providing services generally. There is no doubt that these BIDs

satisfy Article XIII D under *Dahms*.

No cases conflict with *Dahms* or the Superior Court's ruling. *Dahms* expressly applied this Court's holding in *Silicon Valley Taxpayers' Assn., Inc. v. Santa Clara County Open Space Authority* (2008) 44 Cal. 4th 431, 452 fn 8, that "this issue depends on whether assessed properties receive a 'direct advantage' from the assessment district's improvements." (*See Dahms,* 174 Cal.Appl.4th at 711.) *Dahms* was explicitly approved in *Beutz v. County of Riverside* (2010) 184 Cal. App. 4th 1516, 1537, which held that the costs of services "specifically intended" for assessed parcels are a special benefit equal to the costs of such services. Likewise, *Golden Hill Neighborhood Assn., Inc. v. City of San Diego* (2011) 199 Cal. App. 4th 416, 439, applied *Beutz* and held that a district violated Article XIII D because the district assessed for 100% of the costs of its services **despite its engineer finding the services provided a general benefit** that could not be assessed. None of these authorities conflict with *Dahms,* and none would invalidate a BID that assessed only for the costs of services provided directly to and for the benefit of assessed properties.

Review should be denied.

IV. CONCLUSION

As with tax refunds, governments must know their potential losses from prospective BID assessments. The government should not have to wander forward into darkness, unsure whether a BID (by definition created with the approval of a majority vote of the assessees) will inflict financial losses in the future. The Opinion falls well within traditional authorities. It should not be reviewed.

Dated: Aug. 24 2020

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CERTIFICATE OF WORD COUNT

Counsel of Record hereby certifies that pursuant to Rule 8.500(d)(1) of the California Rules of Court, the enclosed Respondent's Brief is produced using 13-point type including footnotes and contains approximately 4,170 words, exclusive of cover information, tables, and certificates as required by Rule 8.500(d)(3). Counsel relies on the word count of the Microsoft Word program used to prepare this brief.

Dated: Aug. 24 2020

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PROOF OF SERVICE

I, Monique Carrillo, declare as follows: I am employed in the County of Los Angeles, California. I am over the age of 18 and not a party to the within action. My business address is 200 N. Main St., Rm. 920 C.H.E., and Los Angeles, California 90012.

On August 24, 2020, I served the foregoing document described as **ANSWER TO PETITION FOR REVIEW,** on the interested parties in this action by placing a **[X]** true copy **[ ]** original copy thereof enclosed in a sealed envelope addressed as follows:

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

Executed on August 24, 2020, at Los Angeles, California.

Monique Carrillo

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **HILL RHF HOUSING PARTNERS v. CITY OF LOS ANGELES**
Case Number: **S263734**
Lower Court Case Number: **B295181**

1. At the time of service I was at least 18 years of age and not a party to this legal action.

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This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

8/25/2020
Date

/s/Monique Carrillo
Signature

Carrillo, Monique (Pro Per)

Last Name, First Name (PNum)

City Attorneys Office

Law Firm