

**EXHIBIT M-1**

**Detailed expenditure reports provided by the City of L.A. to Class Counsel**

Key: Green highlighted items show discrepancies between Worksource Center detail reports and the City's summary  
 Yellow highlighted figures are the amounts attributable directly to individual class members from the Worksource Center detail reports

	Data provided by Ricardo Renteria on 4/20/2022	Data provided by Juan Romero on 2/14/2023	Most recent detail data provided by Juan Romero to Class Counsel on 7/14/23		Latest class member count per individual Worksource Center spreadsheets through June 2023	Class members with any \$ amt attributed to them	Expenditure directly attributed to named individual class members	Notes
			Spend per individual Worksource Center spreadsheets through June 2023 provided 7/14/23	Actual expenditure per GIC Settlement - Fund 10B summary doc provided 7/14/23				
<b>Arbor ResCare-Boyle Heights</b>								
Total expenditure	\$19,798.88	\$19,798.88	\$19,798.88	\$19,701.00				
Total expenditure against individuals	\$19,798.88	\$19,798.88	\$19,798.88		20	19	\$19,798.88	1 listed class member had \$0 expenditure
<b>Arbor Rescare-Canoga Park</b>								
Total expenditure	\$655,365.83	\$793,695.79	\$1,118,132.26	\$1,118,129.00				
Total expenditure against individuals	\$548,654.42	\$675,204.38	\$977,247.54		156	154	\$977,247.54	
Reporting	\$800.00	\$1,150.00	\$1,600.00					
Workshops	\$31,000.00	\$34,500.00	\$34,500.00					
Meetings	\$500.00	\$650.00	\$750.00					
Active members	\$25,400.00	\$30,800.00	\$39,900.00					
Outreach	\$2,083.20	\$3,463.20	\$14,484.01					
Detours Mentoring MOU	\$19,100.00	\$19,100.00	\$19,100.00					
Homies Mentoring MOU	\$10,828.21	\$10,828.21	\$10,828.21					
ACE MOU/ outreach	\$17,000.00	\$18,000.00	\$19,722.50					
<b>Asian American Drug Abuse Program</b>								
Total expenditure	\$558,994.68	\$684,747.76	\$808,371.76	\$808,371.00				
Total expenditure against individuals	\$550,720.90	\$676,248.98	\$803,221.98		103	103	\$803,221.98	
Reporting	\$250.00	\$300.00	\$350.00					
Workshops	\$3,550.00	\$3,550.00	\$0.00					
Meetings	\$800.00	\$850.00	\$1,000.00					
Outreach	\$3,673.78	\$3,798.78	\$3,799.78					
<b>West Valley WSC/Build Rehabilitation Industries</b>								
Total expenditure	\$11,635.00	\$11,635.00	\$11,635.00	\$11,630.00				
Total expenditure against individuals	\$11,635.00	\$11,635.00	\$11,635.00		1	1	\$11,635.00	

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			Spend per individual Worksource Center spreadsheets through June 2023 provided 7/14/23	Actual expenditure per GIC Settlement - Fund 10B summary doc provided 7/14/23				
<b>California State Northridge (Monitor)</b>	not listed	not listed	not listed	\$586,409.00	0	0	\$0.00	No associated class members
<b>Catholic Charities/AJCC</b>								
Total expenditure	\$262,565.00	\$349,922.00	\$512,821.00	\$593,312.00				
Total expenditure against individuals	\$258,741.00	\$345,248.00	\$506,822.00		59	59	\$506,822.00	
Billing, Meetings, Support	\$3,624.00	\$4,374.00	\$5,599.00					
Outreach & Referrals	\$200.00	\$300.00	\$400.00					

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			Spend per individual Worksource Center spreadsheets through June 2023 provided 7/14/23	Actual expenditure per GIC Settlement - Fund 10B summary doc provided 7/14/23				
<b>City of Long Beach-Harbor</b>								
Total expenditure	\$388,580.91	\$426,245.79	\$469,174.19	\$460,287.00				
Total expenditure against individuals	\$336,530.91	\$371,245.79	\$406,699.19		68	68	\$406,699.19	Named "contractor meeting in Dec 22 spreadsheet"
Reporting	\$1,350.00	\$1,600.00	\$2,200.00					
Workshops	\$4,250.00	\$4,250.00	\$4,250.00					
Meetings	\$1,300.00	\$1,300.00	\$1,350.00					
Active Members	\$40,500.00	\$43,200.00	\$48,825.00					
Outreach	\$4,650.00	\$4,650.00	\$5,850.00					
<b>CRCD - Vernon</b>								
Total expenditure	\$48,137.09	\$48,137.09	\$48,137.09	\$44,780.00				
Total expenditure against individuals	\$48,137.09	\$48,137.09	\$48,137.09		26	24	\$48,137.09	2 listed class members had \$0 expenditure
<b>Community Career Development Inc.</b>								
Total expenditure	\$27,336.56	\$55,850.43	\$55,850.43	\$54,356.00				
Total expenditure against individuals	\$25,586.56	\$54,000.43	\$54,000.43		18	18	\$54,000.43	
Reporting	\$50.00	\$100.00	\$100.00					
Workshops								
Meetings	\$500.00	\$550.00	\$550.00					
Active Members								
Outreach	\$1,200.00	\$1,200.00	\$1,200.00					
<b>Downtown Women's Center</b>								
Total expenditure	\$53,416.38	\$53,416.38	\$53,416.38	\$43,346.00				
Total expenditure against individuals	\$39,816.38	\$39,816.38	\$39,816.38		14	14	\$39,816.38	6 got \$150 in services or less
Reporting								

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			Spend per individual Worksource Center spreadsheets through June 2023 provided 7/14/23	Actual expenditure per GIC Settlement - Fund 10B summary doc provided 7/14/23				
Workshops	\$1,000.00	\$1,000.00	\$1,000.00					
Meetings/Reporting	\$2,650.00	\$2,650.00	\$2,650.00					
Active Members	\$1,500.00	\$1,500.00	\$1,500.00					
Outreach	\$8,450.00	\$8,450.00	\$8,450.00					
<b>El Proyecto Del Barrio</b>								
Total expenditure	\$295,639.45	\$422,037.16	\$514,748.99	\$476,799.00				
Total expenditure against individuals	\$291,639.45	\$418,037.16	\$514,748.99		55	55	\$514,748.99	
Reporting/Billing	\$100.00	\$100.00	\$0.00					
Meetings	\$100.00	\$100.00	\$0.00					
Active Members	\$3,800.00	\$3,800.00	\$0.00					April 2022 reported costs did not appear subsequently

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			Spend per individual Worksource Center spreadsheets through June 2023 provided 7/14/23	Actual expenditure per GIC Settlement - Fund 10B summary doc provided 7/14/23				
<b>Friends Outside</b>								
Total expenditure	\$14,173.27	\$14,173.27	\$14,173.27	\$20,445.00				
Total expenditure against individuals	\$13,973.27	\$13,973.27	\$13,973.27		14	11	\$13,973.27	3 listed class members had \$0 expenditure
Outreach	\$200.00	\$200.00	\$200.00					
<b>Goodwill - combined</b>	\$566,213.96	\$704,840.53	\$1,039,855.24	\$1,000,080.00				
<u>Goodwill - Pacoima</u>								
Total expenditure	\$456,244.13	\$501,461.80	\$744,279.23					
Total expenditure against individuals	\$393,746.40	\$433,739.07	\$649,681.50		107	107	\$649,681.50	
Reporting	\$725.00	\$850.00	\$1,525.00					
Workshops	\$31,500.00	\$33,500.00	\$33,500.00					
Meetings	\$350.00	\$450.00	\$950.00					
Active Members	\$25,200.00	\$28,200.00	\$39,400.00					
Outreach	\$4,722.73	\$4,722.73	\$4,822.73					
John Doe			\$14,400.00					in latest report have "John Doe" receiving \$14,400 (that amount is included in the total expenditure listed)
<u>Goodwill - Northeast</u>								
Total expenditure	\$109,969.83	\$203,378.73	\$295,576.01					
Total expenditure against individuals	\$108,219.83	\$197,478.73	\$272,036.01		83	83	\$272,036.01	contains 4 names with no spend reported at all
Reporting	\$1,000.00	\$1,450.00	\$4,500.00					
Meetings	\$650.00	\$850.00	\$1,050.00					
Active Members		\$3,500.00	\$17,340.00					Named "contractor meeting in June 23 spreadsheet"

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Outreach	\$100.00	\$100.00	\$650.00					
<b>HELPER Foundation</b>	not listed	not listed	not listed	\$40,000.00	0	0	none listed	Outreach? No associated class member breakdown
<b>Homeboy Industries</b>								
Total expenditure	\$163,294.60	\$163,294.60	\$163,294.60	\$177,604.00				
Total expenditure against individuals	\$132,294.60	\$132,294.60	\$132,294.60		25	24	\$132,294.60	1 received \$0
Reporting	\$4,800.00	\$4,800.00	\$4,800.00					
Meetings	\$6,000.00	\$6,000.00	\$6,000.00					
Outreach	\$20,200.00	\$20,200.00	\$20,200.00					
<b>Homeboy Industries (Prof Dev)</b>	not listed	not listed	not listed	\$13,413.00	0	0	none listed	Unclear what this is for; no class members associated with this expenditure
<b>Homeboy Industries (Tattoo Removal)</b>	\$29,264.00	\$29,264.00	\$29,264.00	\$38,081.00	17	17	\$29,264.00	

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<b>HACLA</b>								
Total expenditure	\$1,371,332.79	\$1,536,043.51	\$1,614,924.33	\$1,588,287.00				
Total expenditure against individuals	\$1,371,207.79	\$1,535,818.51	\$1,614,799.33		176	176	\$1,614,799.33	Unclear why this amount changed between periods
Outreach	\$125.00	\$225.00	\$125.00					
<b>Jewish Vocational Services/West LA</b>								
Total expenditure	\$173,865.71	\$203,168.15	\$182,113.17	\$233,964.00				Unclear why total spend went down from \$203k in December 2022 to \$187k the following June 2023
Total expenditure against individuals	\$170,490.71	\$199,293.15	\$178,838.17		27	27	\$178,838.17	
Reporting/Billing	\$2,050.00	\$2,150.00	\$1,950.00					
Meetings	\$1,150.00	\$1,150.00	\$1,150.00					
Active Members		\$400.00	\$0.00					
Outreach	\$175.00	\$175.00	\$175.00					
<b>LA Conservation Corps</b>								
Total expenditure	\$30,166.70	\$30,166.70	\$30,166.70	\$29,900.00				
Total expenditure against individuals	\$23,366.70	\$23,366.70	\$23,366.70		2	2	\$23,366.70	
Meetings/reports	\$1,100.00	\$1,100.00	\$1,100.00					
Outreach	\$5,700.00	\$5,700.00	\$5,700.00					
<b>Managed Career Solutions - Combined</b>	\$438,462.90	\$504,363.12	\$786,607.61	\$731,000.00				
<u>Managed Career Solutions - Hollywood</u>								
Total expenditure	\$341,833.76	\$365,946.42	\$619,967.98					



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Total expenditure against individuals	\$321,433.76	\$345,546.42	\$585,167.98		127	69	\$585,167.98	Latest Worksource Center detail report contains over 50 names without individual expenditures
Reporting/Billing	\$150.00	\$150.00	\$150.00					
Workshops	\$2,500.00	\$2,500.00	\$2,500.00					
Meetings	\$50.00	\$50.00	\$50.00					
Active Members	\$17,700.00	\$17,700.00	\$17,700.00					
John Doe	\$0.00	\$0.00	\$14,400.00					in latest report have "John Doe" receiving \$14,400 (that amount is included in the total expenditure listed)
<u>Managed Career Solutions - Boyle Heights</u>								
Total expenditure	\$96,629.14	\$138,416.70	\$166,639.63					
Total expenditure against individuals	\$96,629.14	\$129,978.90	\$166,639.63		58	58	\$166,639.63	The number of class members served in Dec 22 was higher (59) Unclear why outreach cost disappeared in the most recent report
Outreach		\$8,437.80	\$0.00					
<b>PACE/Downtown Pico-Union</b>								
Total expenditure	\$175,101.92	\$302,734.72	\$412,491.54	\$411,945.00				
Total expenditure against individuals	\$149,376.92	\$261,959.72	\$359,466.54		25	25	\$359,466.54	listed as "Contractor Mtg"
Reporting/Billing	\$2,000.00	\$2,500.00	\$2,900.00					
Workshops	\$4,500.00	\$5,000.00	\$5,000.00					
Meetings	\$850.00	\$1,000.00	\$1,150.00					
Active Members	\$17,200.00	\$31,100.00	\$42,600.00					
Outreach	\$1,175.00	\$1,175.00	\$1,375.00					
<b>UAW-LETC</b>								

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Total expenditure	\$129,978.32	\$138,973.66	\$119,682.14	\$169,088.00				Unclear why this amount decreased in June 2023 from prior reports
Total expenditure against individuals	\$129,978.32	\$138,973.66	\$119,682.14		21	21	\$119,682.14	
<b>Venice 200/HELPER Foundation</b>	not listed	not listed	not listed	\$18,857.00	0	0	none listed	
<b>WLCAC</b>								
Total expenditure	\$12,443.30	\$12,443.30	\$12,443.30	\$16,149.00				
Total expenditure against individuals	\$12,443.30	\$12,443.30	\$12,443.30		7	7	\$12,443.30	
<b>YPI-Pacoima North Valley</b>								
Total expenditure	\$300.00	\$300.00	\$300.00	not listed				
Total expenditure against individuals	\$300.00	\$300.00	\$300.00		1	1	\$300.00	
<b>TOTALS</b>	<b>\$5,426,067.25</b>	<b>\$6,505,251.84</b>	<b>\$8,017,401.88</b>	<b>\$8,705,933.00</b>	<b>1210</b>	<b>1143</b>	<b>\$7,540,080.65</b>	

**EXHIBIT M-2**

**Summary of spending by worksource centers not attributed to individual class members**

	Reporting	Meetings	Reporting/ Meetings	Outreach	Active members	Workshops	MOUs	John Doe	Totals	Notes
Arbor Rescare-Canoga Park	\$1,600.00	\$750.00		\$14,484.01	\$39,900.00	\$34,500.00	\$49,650.71		\$140,884.72	
Asian American Drug Abuse Program	\$350.00	\$1,000.00		\$3,799.78					\$5,149.78	
Catholic Charities/AJCC*			\$5,599.00	\$400.00					\$5,999.00	
City of Long Beach-Harbor	\$2,200.00	\$1,350.00		\$5,850.00	\$48,825.00	\$4,250.00			\$62,475.00	
Community Career Development Inc.	\$100.00	\$550.00		\$1,200.00					\$1,850.00	
Downtown Women's Center			\$2,650.00	\$8,450.00	\$1,500.00	\$1,000.00			\$13,600.00	
El Proyecto Del Barrio		\$100.00	\$100.00		\$3,800.00				\$4,000.00	Note: in latest spending report these figures do not appear but they are broken down in earlier reports from May 2022 and February 2023
Friends Outside				\$200.00					\$200.00	
Goodwill - Pacoima	\$1,525.00	\$950.00		\$4,822.73	\$39,400.00	\$33,500.00		\$14,400.00	\$94,597.73	
Goodwill - Northeast	\$4,500.00	\$1,050.00		\$650.00	\$17,340.00				\$23,540.00	
Homeboy Industries	\$4,800.00	\$6,000.00		\$20,200.00					\$31,000.00	
HACLA				\$225.00					\$225.00	\$225 reported in Feb 2023 exp reports; in prior and later reports outreach was listed as
Jewish Vocational Services/West LA		\$1,150.00	\$1,950.00	\$175.00					\$3,275.00	
LA Conservation Corps			\$1,100.00	\$5,700.00					\$6,800.00	
Managed Career Solutions - Hollywood		\$50.00	\$150.00		\$17,700.00	\$2,500.00		\$14,400.00	\$34,800.00	
Managed Career Solutions - Boyle Heights				\$8,437.80					\$8,437.80	Note: in latest spending report this figure does not appear but it appears in the Feb 2023 spending report
PACE/Downtown Pico-Union		\$1,150.00	\$2,900.00	\$1,375.00	\$42,600.00	\$5,000.00			\$53,025.00	
<b>Totals</b>	<b>\$15,075.00</b>	<b>\$14,100.00</b>	<b>\$14,449.00</b>	<b>\$75,969.32</b>	<b>\$211,065.00</b>	<b>\$80,750.00</b>	<b>\$49,650.71</b>	<b>\$28,800.00</b>	<b>\$489,859.03</b>	

**EXHIBIT M-3**

**Listed Service providers with no individual class members listed**

<b>Organization</b>	<b>Amount</b>
HELPER Foundation	\$40,000.00
Homeboy Industries (Prof Dev)	\$13,413.00
Venice 200/HELPER Foundation	\$18,857.00
<b>Contracted through Arbor-Rescare Canoga Park</b>	
Detours Mentoring MOU	\$19,100.00
Homies Mentoring MOU	\$10,828.21
ACE MOU/ outreach	\$19,722.50
<b>Total Outreach/Community Based Organizations</b>	<b>\$49,650.71</b>
<b>California State Northridge (Monitor)</b>	<b>\$586,409.00</b>

**EXHIBIT N**

<b>Provider</b>	<b>Total</b>	<b>Nothing/Outreach/Case Management</b>	<b>%</b>
Arbor Rescare – Boyle Heights Worksource Center – (Arbor E&T LLC) C-129710	20	7	35.00%
Arbor Rescare – Canoga Park Worksource Center – C-129709	156	29	18.59%
Homeboy Industries C-129567	25	4	16.00%
Homeboy Industries C-130274	17	0	0.00%
City of Long Beach – Harbor Worksource Center C-129853	68	12	17.65%
MCS – Hollywood Worksource Center C-129468	127	66	51.97%
MCS- Boyle Heights Worksource Center C-129468	58	19	32.76%
Goodwill- Northeast Los Angeles Worksource Center C-129565	83	23	27.71%
Goodwill—Pacoima/North Valley Worksource Center C-129565	107	13	12.15%
YPI – Pacoima North Valley Worksource Center C-129490	1	1	100.00%
UAW – South Los Angeles WSC C-129533	21	3	14.23%
WLCAC – Southeast Los Angeles Worksource Center C-129531	7	2	28.57%
El Proyecto – Sun Valley Worksource Center C-129544	55	0	0.00%
CRCD – Vernon Central Worksource Center C-129467	26	10	38.46%
HACLA – Watts Los Angeles Worksource Center C-129532	176	16	9.09%
AADP- West Adams Worksource Center C-129464	103	22	21.36%
JVS- West Los Angeles Worksource Center C-129568	27	9	33.33%
West Valley WSC Build West Valley – West Valley WSC C-129465	1	0	0.00%
CCD – Wilshire Metro WSC-129466	18	10	55.55%
LACCORP WSC C-129491	2	0	0.00%
Friends Outside of Los Angeles C-129564	14	8	57.14%
South Los Angeles AJCC C-131188 (Catholic Charities of LA)	59	5	8.47%
Downtown Womens Center C-129492	14	10	71.43%
Downtown/Pico Union WSC C-129530 (PACE)	25	1	4.00%
<b>TOTAL</b>	<b>1,210</b>	<b>270</b>	<b>22.31%</b>



**EXHIBIT O**

	Total	Nothing/Outreach/Case mgmt	
Arbor Rescare- Boyle Heights WorkSource Center- (Arbor E&T LLC) C- 129710	20	7	35.00%
Arbor Rescare-Canoga Park Worksource Center- C- 129709	121	22	18.18%
Homeboy Industries C- 129567	25	4	16.00%
Homeboy Industries C- 130274 ( Tattoo Removal)	17	0	0.00%
City of Long Beach-Harbor WorkSource Center C- 129853	64	16	25.00%
MCS- Hollywood Worksource Center C- 129468	38	1	2.63%
MCS- Boyle Heights Worksource Center C- 129468	59	25	42.37%
Goodwill- Northeast Los Angeles WorkSource Center C-129565	62	11	17.74%
Goodwill- Pacoima/ North Valley WorkSource Center C-129565	89	12	13.48%
YPI- Pacoima North Valley Worksource Center C- 129490	1	1	100.00%
UAW- South Los Angeles WSC C-129533	19	2	10.53%
WLCAC- Southeast Los Angeles WorkSource Center C-129531	7	2	28.57%
El Proyecto- Sun Valley Worksource Center C-129544	51	2	3.92%
CRCD - Vernon Central WorkSource Center C- 129467	26	10	38.46%
HACLA-Watts Los Angeles WorkSource Center C-129532	175	17	9.71%
AADAP - West Adams WorkSource Center C-129464	96	18	18.75%
JVS -West Los Angeles WorkSource Center C- 129568	27	9	33.33%
West Valley WSC Build West Valley- West Valley WSC C-129465	1	0	0.00%
CCD- Wilshire Metro WSC C-129466	18	7	38.89%
LACCORP WSC C-129491	2	0	0.00%
Friends Outside of Los Angeles County C-129564	14	8	57.14%
South Los Angeles AJCC C-131188	51	5	9.80%
Downtown Womens Center C-129492	14	10	71.43%
Downtown/ Pico Union WSC C-129530	25	3	12.00%
<b>TOTAL</b>	<b>1022</b>	<b>192</b>	<b>18.79%</b>

**EXHIBIT P**

**McMahon, Robert**

---

**From:** Ghirlandi Guidetti  
**Sent:** Thursday, July 20, 2023 8:49 AM  
**To:** 'Juan Romero'; Stephanie Carroll; Jackie Chidiac; Ash Rojo; Karina Henriquez; Scott Marcus; Gerardo Ruvalcaba; Donny Brooks; Regina Mills; Chris Lee  
**Cc:** Estrada, Tony; Catherine Bondoc  
**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses

Hi Juan,

Thank you for providing these document. We are still in the process of reviewing them, but noted that the data is incomplete. For example, the PDF file titled "EWDD LARCA Costs for Admin. and Program (OPS)" with the heading "EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" does not include year-to-date data for the current (year 6) program year. Instead, there is a note that "EWDD's fiscal unit is still working on compiling financial data for this prior PY 22-23."

We had agreed you would provide us all information, to date, by July 14. Please advise when we can expect the missing data. We would like to analyze a complete dataset before we discuss this matter again.

Relatedly, the documents you provided did not include the following, which you agreed to send us:

A list of the seven community based outreach partners you stated have been helping the WorkSource centers and providers better serve the class member population. Please include information about which EWDD contractor(s) each organization works with.

Thank you,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) | [www.publiccounsel.org](http://www.publiccounsel.org)

**From:** Juan Romero <juan.romero@lacity.org>

**Sent:** Friday, July 14, 2023 11:47 AM

**To:** Stephanie Carroll <scarroll@publiccounsel.org>; Ghirlandi Guidetti <gguidetti@publiccounsel.org>; Jackie Chidiac <jchidiac@publiccounsel.org>; Ash Rojo <arojo@publiccounsel.org>; Karina Henriquez <karina.henriquez@lacity.org>; Scott Marcus <Scott.Marcus@lacity.org>; Gerardo Ruvalcaba <gerardo.ruvalcaba@lacity.org>; Donny Brooks <donny.brooks@lacity.org>; Regina Mills <regina.mills@lacity.org>; Chris Lee <Chris.N.Lee@lacity.org>

**Cc:** Estrada, Tony <tony.estrada@lacity.org>; Catherine Bondoc <catherine.bondoc@lacity.org>

**Subject:** LARCA Folder with EWDD Settlement Related Expenses

Hi Stephanie and Team,

Hope all is well! please see the LARCA Folder with Financial Expenditure Documents that were requested by Public Counsel.

- LARCA Agencies Financial Expenditure Reports Folder - Agency Case Management Services and Participant Support Services Totals YTD (We're still collecting and consolidating May & June 2023 agency invoices)
- EWDD LARCA Cost for Admin & Program YTD.
- Updated LARCA Agency Settlement Expenses by Program Year
- Policy Support Service /Needs Related

Please let us know if you have any questions regarding the documents. Thanks again.

--

Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

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Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

(213) 744-9042 fax

[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

**EXHIBIT Q**

**McMahon, Robert**

---

**From:** Gerardo Ruvalcaba <gerardo.ruvalcaba@lacity.org>  
**Sent:** Friday, September 1, 2023 3:07 PM  
**To:** Ghirlandi Guidetti  
**Cc:** Juan Romero; Karina Henriquez; Ash Rojo; Catherine Bondoc; Chris Lee; Donny Brooks; Estrada, Tony; Jackie Chidiac; Regina Mills; Scott Marcus; Stephanie Carroll  
**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses  
**Attachments:** PC Response - 9.1.23.pdf; Gang Injunction Curfew Settlement City Costs FY 16-17 to FY 23-24.pdf

Hello Ghirlandi,

EWDD responses to your questions and updated EWDD expenditure report are attached.

Please let us know if you have further questions.

Thank you

On Thu, Aug 17, 2023 at 2:36 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Juan,

Thanks for providing us the “*Program and Administration Budget Narrative document*” in your below email. As I understand it, EWDD considers your and Karina’s salaries (and related fringe benefits expenses) to be Program Operations rather than administrative expenses. Is that right? In addition, it seems that EWDD is considering as Program Operations things like rent/lease and contractual services. Please confirm if my understanding is correct; and whether there is any difference between “Program Expenses” and “Program Operations,” or if those terms are used synonymously.

Notwithstanding our view that all of these expenses are “administrative” under the settlement agreement, we ask that you provide us additional details so that we can see the breakdown of everything EWDD is counting as “Program Operations” and Administrative” to obtain the totals in the attached PDF (“*EWDD LARCA Costs for Admin. and Program (OPS)*”). For example, please provide an annual breakdown per year of spending on all the items enumerated such as the salaries for the Senior Project Coordinator, assistant, accountants, auditors, personnel etc., as well as the costs for GASP, benefits, central services, Cap 43, printing, travel, rent, etc.

In addition, we are unable to reconcile the WorkSource center expenses detailed in the excel worksheets you sent us on July 14 with the figures in the PDF titled “*Gang Injunction Curfew Settlement LARCA 2.0 Financial Report for Period Ended 6\_30\_2023 by CB Revised with Details.*” We prepared the attached excel document (“*2023-07-25 Comparison of Expenditures 4860-8894-6034 v.1*”) comparing the expenses reflected in the different documents we receive from you to show the inconsistencies and missing information. Please provide us with information sufficient to reconcile these discrepancies and information gaps.

Finally, please advise whether costs associated with contractors that do not provide direct services but assist with outreach or other aspects of program administration (e.g., the monitor at CalState Northridge and HELPER) are “program” or “administrative” costs according to EWDD.

Thanks in advance,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID748biawHs3310Xd1&T=PBCL&HV=U,E,X,T&H=1dd500370ab10056c824dea946fdcf24d1b98527>

---

**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Tuesday, August 15, 2023 12:56 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

Hope all is well! Please see the attachment of the information you requested regarding “EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost” considered “Program Operations” or Administrative”? Hope this helps and please let us know if you need any other information. Thanks again.

On Tue, Aug 15, 2023 at 8:21 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Good morning, Karina, Gerardo, and others on the EWDD Team,



Thank you for your August 4 response to our July 21 letter about EWDD's dual enrollment policy (LARCA 2.0 and WIOA). We are in the process of analyzing the information you provided and will follow up, as needed.

I don't think we've received a response to the following questions from my July 24 email (below) and would greatly appreciate your prompt response:

*We are still reviewing the financial records provided to us and it is not clear what the city includes in the category "Administrative" and what it considers "Program Operations." Can you please help us understand this? For example, are the "Outreach, Marketing & Others" expenses in the document with the heading*

*"EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" considered "Program Operations" or Administrative"?*

*We are also having trouble reconciling the \$3.3 million total in the document with the heading "EWDD Costing for Gang Injunction Curfew Settlement- (LARCA 2.0)" with the \$2.8 million listed as expended by the city in the document with the heading "GANG INJUNCTION CURFEW (GIC) SETTLEMENT (LARCA 2.0) - Fund 10B."*

Thank you,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Ghirlandi Guidetti

**Sent:** Wednesday, August 2, 2023 3:13 PM

**To:** 'Juan Romero' <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses

**Importance:** High

Hello EWDD Team:

I understand that Juan is on a (well-earned) vacation. In his absence, I'm hoping someone else on the team can address the questions in my below email.

I also wanted to elevate the attached letter to which we requested a response by this Friday, August 4.

Thank you in advance,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID748biawHs3310Xd1&T=PBCL&HV=U,E,X,T&H=1dd500370ab10056c824dea946fdcf24d1b98527>

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**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Tuesday, July 25, 2023 2:06 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

I'm going on vacation starting tomorrow, but our EWDD Team will be reaching out to you regarding your email request. Thanks again.

On Mon, Jul 24, 2023 at 8:15 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Juan,

Thanks for passing on the expected timeframe for the missing data and sending us the GRYD and community organization list.

We are still reviewing the financial records provided to us and it is not clear what the city includes in the category "Administrative" and what it considers "Program Operations." Can you please help us understand this? For example, are the "Outreach, Marketing & Others" expenses in the document with the heading

"EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" considered "Program Operations" or Administrative"?

We are also having trouble reconciling the \$3.3 million total in the document with the heading "EWDD Costing for Gang Injunction Curfew Settlement- (LARCA 2.0)" with the \$2.8 million listed as expended by the city in the document with the heading "GANG INJUNCTION CURFEW (GIC) SETTLEMENT (LARCA 2.0) - Fund 10B."

Thanks in advance for explaining this to us.

Best,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Thursday, July 20, 2023 4:16 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

Hope all is well! Please see attachment of the GRYD and Community Organizations we're working with for PY 23-24. I apologize for the oversight

I'm also attaching Donny's email regarding the EWDD LARCA Cost and Program Financials for PY 22-23:

Hi Juan,

Please advise Public Counsel that the final EWDD Costs for Administrative and Program financial data for PY 22-23 ending June 30th is pending as there is a 45-60 day lag to complete the financial closeout report. This information is not yet available. Catherine and Tony, please advise if this is the appropriate response.

Thank you.

--

Donny Brooks

Assistant Chief Grants Administrator

Economic and Workforce Development Department  
1200 W. 7th St, 6th floor  
Los Angeles, CA 90017  
(213) 744-9093 wk  
(213) 744-9042 fax

[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)

On Thu, Jul 20, 2023 at 8:48 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Juan,

Thank you for providing these document. We are still in the process of reviewing them, but noted that the data is incomplete. For example, the PDF file titled "EWDD LARCA Costs for Admin. and Program (OPS)" with the heading "EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" does not include year-to-date data for the current (year 6) program year. Instead, there is a note that "EWDD's fiscal unit is still working on compiling financial data for this prior PY 22-23."

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Relatedly, the documents you provided did not include the following, which you agreed to send us:

A list of the seven community based outreach partners you stated have been helping the WorkSource centers and providers better serve the class member population. Please include information about which EWDD contractor(s) each organization works with.

Thank you,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

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**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Friday, July 14, 2023 11:47 AM

**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>

**Cc:** Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>

**Subject:** LARCA Folder with EWDD Settlement Related Expenses

Hi Stephanie and Team,

Hope all is well! please see the LARCA Folder with Financial Expenditure Documents that were requested by Public Counsel.

- LARCA Agencies Financial Expenditure Reports Folder - Agency Case Management Services and Participant Support Services Totals YTD (We're still collecting and consolidating May & June 2023 agency invoices)
- EWDD LARCA Cost for Admin & Program YTD.
- Updated LARCA Agency Settlement Expenses by Program Year
- Policy Support Service /Needs Related

Please let us know if you have any questions regarding the documents. Thanks again.

--

Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

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Los Angeles, CA 90017

(213) 744-9709 wk

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[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

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--

Juan Romero  
LARCA Program  
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Juan Romero  
LARCA Program  
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Economic and Workforce Development Department

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--

Juan Romero

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Sr. Project Coordinator

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Juan Romero

LARCA Program

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Economic and Workforce Development Department

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[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

--

Gerardo Ruvalcaba, Assistant General Manager  
Workforce Development System  
Economic and Workforce Development Department

Phone: (213) 744-7233

E-Mail: [Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org)

**EXHIBIT R**

## **Gang Injunction Curfew - LARCA 2.0 – Program and Administration**

### **PROGRAM OVERSITE**

**Senior Project Coordinator** - who will be responsible for overseeing the coordinating all necessary and preliminary planning activities, execution of the contract with the evaluator, establishing subgrants, contracts, and other agreements, as well as monitoring of the program. Activities include coordinating with and engaging all key program partner agencies on program implementation, program monitoring and technical assistance. The Senior Project Coordinator will ensure proper management of all grant activities, including timely reporting of outcomes to Public Council. SPC will be the liaison between EWDD and the City Attorney's Office.

**Senior Project Assistant** - who will be responsible position will provide day-to-day operations of the program, marketing, follow-up services. Assist in tracking EWDD contract, review and approve invoices. Provide technical assistance to subcontractors regarding invoices and work directly with participants of the settlement on a case-by-case basis. Will be responsible for the establishment on the initial contract, work with subcontractors to obtain contract execution documents.

### **ADMINISTRATIVE FUNCTIONS**

**Principal Accountant I** - who will be responsible for grant management, generating statistical and financial reports.

**Accountant** - who will be responsible for analyzing contractors' invoices, tracking expenditures vs. budget, and preparing encumbrance and payment documents related to this grant.

**Fiscal Systems Specialist** - who will be responsible for overseeing all fiscal activities related to this project, including but not limited to reviewing all final financial reports, processed invoices and payments,

**Senior Auditor** - who will be responsible for the planning and supervision of the fiscal review activities related to this grant.

**Auditor II** - who will be responsible for fiscal review of contractors related to this grant.

**City Attorney** - who will be responsible for review of contractors related between EWDD and subcontractors of this grant.

**Personnel** - Shared cost of EWDD in house personnel staff

### **PROGRAM AND ADMINISTRATIVE SHARED COST**

## **Gang Injunction Curfew - LARCA 2.0 – Program and Administration**

**General Administrative Support Program (GASP)** - The Department General Administrative Support costs or what we refer to as “GASP (General Administrative and Support Program)” is EWDD’s indirect cost pool which include salaries, fringe benefits and other expenses incurred by the department’s executive management, information technology, administrative services, financial management, and personnel divisions, that benefit the department as a whole. These shared expenses are pooled and then allocated to various cost objectives (i.e., divisions, programs, funding sources, etc.) consistent with the department’s established cost allocation plan and in compliance with federal grant regulations.

**Fringe Benefits 45.88%** – Funds needed for City-mandated pension retirement, and health insurance benefits of direct general salaries. The budgeted amount listed is the projected amount needed for City-mandated pension retirement and health insurance benefits.

**Central Services (Indirect Cost) 13.62%** - This is EWDD’s share of the City of Los Angeles central services or what is referred to as “indirect cost.” This account represents the share allocated to the EWDD for the costs of the City’s support departments such as the Controller’s Office, City Administrative Officer, Personnel Department, Information Technology Agency, City Council and General Services Department. This is separate and apart from EWDD’s own indirect cost pool or GASP as described above. The City of LA’s annual Cost Allocation Plan (CAP), prepared by the Office of the Controller, is reviewed and approved by the City’s federal cognizant agency, currently the US Department of Housing and Urban Development (HUD). The CAP establishes the City’s fringe benefit and indirect cost rates for each City department, including EWDD. Both of these rates are applied to salaries.

**Per Cost Allocation Plan (CAP 43)** - the rates that we used in our budget are from the most recently submitted CAP 43, the calculation is made by applying 59.50% of total salaries charged to this grant.

**Printing and Binding** - The budgeted amount is an estimate for program flyer, brochures, postage and business cards.

**Travel & Transportation** - The budgeted amount is an estimate for EWDD staff to attend conferences, collaborative meetings, trainings, and presentations associated with this program.

**Contractual Services** - This budget amount includes the following services: (Building maintenance, Water and Electricity, Pest Control, Photo Copier and Maintenance, Security Services, Network ect.).

**Office and Administration** - The budgeted amount is an estimate for program office supplies such as pens, paper, note pads ect.

**Rent/Lease**– The budgeted amount will cover the cost of rent and employee parking allocable to this grant.

**EXHIBIT S-1**

Additional Public Counsel Questions

1. As I understand it, EWDD considers your and Karina's salaries (and related fringe benefits expenses) to be Program Operations rather than administrative expenses. Is that right?

**Response: Yes**

2. In addition, it seems that EWDD is considering as Program Operations things like rent/lease and contractual services.

- a. Please confirm if my understanding is correct; and

**Response: Not entirely. Rent/lease charges are a function of direct salary expenditures. Rent/lease charges connected to program staff are considered program while rent/lease charges connected to administrative staff are considered administrative costs.**

- b. whether there is any difference between "Program Expenses" and "Program Operations," or if those terms are used synonymously.

- c. **Response: The terms are used synonymously.**

3. Notwithstanding our view that all of these expenses are "administrative" under the settlement agreement, we ask that you provide us additional details so that we can see the breakdown of everything EWDD is counting as "Program Operations" and "Administrative" to obtain the totals in the attached PDF ("*EWDD LARCA Costs for Admin. and Program (OPS)*"). For example, please provide an annual breakdown per year of spending on all the items enumerated such as the salaries for the Senior Project Coordinator, assistant, accountants, auditors, personnel, etc., as well as the costs for GASP, benefits, central services, Cap 43, printing, travel, rent, etc.

**Response: Much of this information is available in the Budget Schedule included in the Annual Plan (<https://ewddlcity.com/index.php/annualplan24>). Other items are shared costs, which cannot be broken down so granularly (such as printing, because EWDD does not have printers paid for and for the exclusive use of, the LARCA 2.0 program).**

4. In addition, we are unable to reconcile the WorkSource center expenses detailed in the excel worksheets you sent us on July 14 with the figures in the PDF titled "*Gang Injunction Curfew Settlement LARCA 2.0 Financial Report for Period Ended 6\_30\_2023 by CB Revised with Details*." We prepared the attached excel document ("*2023-07-25 Comparison of Expenditures 4860-8894-6034 v.1*") comparing the expenses reflected in the different documents we receive from you to show the inconsistencies and missing information. Please provide us with information sufficient to reconcile these discrepancies and information gaps.

**Response: An updated EWDD expenditure report is attached. This includes EWDD expenditures through July 31, 2023. This also includes corrections to previously reported expenditures, including removing Central Service expenditures, which were incorrectly included in our previous report. Central Services are not charged to City General Fund programs. The reconciliation of WSC expenditures will be provided by next Friday, September 8, 2023.**

Additional Public Counsel Questions

5. Finally, please advise whether costs associated with contractors that do not provide direct services but assist with outreach or other aspects of program administration (e.g., the monitor at CalState Northridge and HELPER) are “program” or “administrative” costs according to EWDD.

**Response: Contractor costs vary, depending on their scope of work. Outreach support such as HELPER are considered program functions. Program evaluation such as the work completed by CSUN is also a program function.**

**Additional comments:**

While Public Counsel may have concerns over EWDD staff expenditures for this program, it should be noted that 1) no eligible participant has been denied services nor turned away from the program due to lack of funding; 2) Juan and Karina engage in implementing program services such as supporting enrollments, addressing program participant issues, fast tracking approval of program services and, in many cases, hand delivering tools and payments to program participants; and 3) Karina reviews program invoices, which is a program function per our Financial Management Division, because it requires working directly with contractors in order to retrieve supporting documentation that supports contractor billing.

We also work directly with program contractors to develop outreach plans and community partnerships that have resulted in increased enrollments.

EWDD is open to reducing its staffing levels to reduce administrative costs for the remainder of the program, however, this will negatively impact service delivery.



**EXHIBIT S-2**



**EXHIBIT T**

## McMahon, Robert

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**From:** Ghirlandi Guidetti  
**Sent:** Tuesday, September 19, 2023 8:45 AM  
**To:** 'Gerardo Ruvalcaba'  
**Cc:** 'Juan Romero'; 'Karina Henriquez'; Ash Rojo; 'Catherine Bondoc'; 'Chris Lee'; 'Donny Brooks'; 'Estrada, Tony'; Jackie Chidiac; 'Regina Mills'; 'Scott Marcus'; Stephanie Carroll  
**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Due By:** Monday, September 25, 2023 4:00 PM  
**Flag Status:** Flagged

Good Morning:

I have not received a response to my September 7 email or September 13 follow-up, both below. When we met on June 9, the city/EWDD agreed to provide Class Counsel by July 14 information that would enable us to determine whether it is complying with the settlement agreement provision capping "administrative costs" at 10 percent.

It is now more than two months past the agreed upon deadline, and the information you have provided us has been inconsistent, incomplete, and insufficient to determine compliance with the settlement agreement.

We respectfully request that you please respond with all the information requested in my September 7 email by no later than **Monday, September 25**.

Thank you,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) | [www.publiccounsel.org](http://www.publiccounsel.org)

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**From:** Ghirlandi Guidetti  
**Sent:** Wednesday, September 13, 2023 3:43 PM  
**To:** 'Gerardo Ruvalcaba' <gerardo.ruvalcaba@lacity.org>  
**Cc:** 'Juan Romero' <juan.romero@lacity.org>; 'Karina Henriquez' <karina.henriquez@lacity.org>; Ash Rojo <arojo@publiccounsel.org>; 'Catherine Bondoc' <catherine.bondoc@lacity.org>; 'Chris Lee' <Chris.N.Lee@lacity.org>; 'Donny Brooks' <donny.brooks@lacity.org>; 'Estrada, Tony' <tony.estrada@lacity.org>; Jackie Chidiac <jchidiac@publiccounsel.org>; 'Regina Mills' <regina.mills@lacity.org>; 'Scott Marcus' <Scott.Marcus@lacity.org>; Stephanie Carroll <scarroll@publiccounsel.org>  
**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses  
**Importance:** High

Good afternoon,

I know everyone is very busy, but we would greatly appreciate an update on when we can expect a response to the request below.

Thank you,  
Ghirlandi

---

**From:** Ghirlandi Guidetti

**Sent:** Thursday, September 7, 2023 12:44 PM

**To:** 'Gerardo Ruvalcaba' <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>

**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses

Thank you, Gerardo.

The corrections to this most recent expenditure report – which you describe as “including removing Central Service expenditures, which were incorrectly included in our previous report” – are preventing us from reconciling the figures with the detailed breakdowns EWDD previously sent us. In addition, it is not clear if the corrections change the total expense or only the admin/total expense.

Can you please send us one document with all the complete and correct information, including everything in the attached 06/30/23 financial report? We ask that you take care to make it internally consistent (i.e., the 06/30 report has figures in the summary expenditures on the first page that do not match the expenditures in the other pages). In addition, we would like to see the breakdown of the “EWDD Oversight” values into “admin” and “program expenses” as in the most recently provided expenditure report.

Unfortunately, the additional information provided regarding what EWDD considers “administrative” and what it counts as “program costs” still do not help us determine how those breakdown match up to the settlement agreement’s definition of “administrative cost.” Please provide an updated, revised, and correct version of the attached program narrative that clearly delineates what is counted as “admin” and what is “program.”

Thank you,  
Ghirlandi

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**From:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>

**Sent:** Friday, September 1, 2023 3:07 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hello Ghirlandi,

EWDD responses to your questions and updated EWDD expenditure report are attached.

Please let us know if you have further questions.

Thank you

On Thu, Aug 17, 2023 at 2:36 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Juan,

Thanks for providing us the “*Program and Administration Budget Narrative document*” in your below email. As I understand it, EWDD considers your and Karina’s salaries (and related fringe benefits expenses) to be Program Operations rather than administrative expenses. Is that right? In addition, it seems that EWDD is considering as Program Operations things like rent/lease and contractual services. Please confirm if my understanding is correct; and whether there is any difference between “Program Expenses” and “Program Operations,” or if those terms are used synonymously.

Notwithstanding our view that all of these expenses are “administrative” under the settlement agreement, we ask that you provide us additional details so that we can see the breakdown of everything EWDD is counting as “Program Operations” and Administrative” to obtain the totals in the attached PDF (“*EWDD LARCA Costs for Admin. and Program (OPS)*”). For example, please provide an annual breakdown per year of spending on all the items enumerated such as the salaries for the Senior Project Coordinator, assistant, accountants, auditors, personnel etc., as well as the costs for GASP, benefits, central services, Cap 43, printing, travel, rent, etc.

In addition, we are unable to reconcile the WorkSource center expenses detailed in the excel worksheets you sent us on July 14 with the figures in the PDF titled “*Gang Injunction Curfew Settlement LARCA 2.0 Financial Report for Period Ended 6\_30\_2023 by CB Revised with Details.*” We prepared the attached excel document (“2023-07-25 Comparison of Expenditures 4860-8894-6034 v.1”) comparing the expenses reflected in the different documents we receive from you to show the inconsistencies and missing information. Please provide us with information sufficient to reconcile these discrepancies and information gaps.

Finally, please advise whether costs associated with contractors that do not provide direct services but assist with outreach or other aspects of program administration (e.g., the monitor at CalState Northridge and HELPER) are “program” or “administrative” costs according to EWDD.

Thanks in advance,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) | <https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID748biawHs3310Xd1&T=PBCL&HV=U,E,X,T&H=1dd500370ab10056c824dea946fdcf24d1b98527>

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**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>  
**Sent:** Tuesday, August 15, 2023 12:56 PM  
**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>  
**Cc:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>  
**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

Hope all is well! Please see the attachment of the information you requested regarding “EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost” considered “Program Operations” or Administrative”? Hope this helps and please let us know if you need any other information. Thanks again.

On Tue, Aug 15, 2023 at 8:21 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Good morning, Karina, Gerardo, and others on the EWDD Team,

Thank you for your August 4 response to our July 21 letter about EWDD’s dual enrollment policy (LARCA 2.0 and WIOA). We are in the process of analyzing the information you provided and will follow up, as needed.

I don’t think we’ve received a response to the following questions from my July 24 email (below) and would greatly appreciate your prompt response:

*We are still reviewing the financial records provided to us and it is not clear what the city includes in the category “Administrative” and what it considers “Program Operations.” Can you please help us understand this? For example, are the “Outreach, Marketing & Others” expenses in the document with the heading*

*“EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost” considered “Program Operations” or Administrative”?*

*We are also having trouble reconciling the \$3.3 million total in the document with the heading "EWDD Costing for Gang Injunction Curfew Settlement- (LARCA 2.0)" with the \$2.8 million listed as expended by the city in the document with the heading "GANG INJUNCTION CURFEW (GIC) SETTLEMENT (LARCA 2.0) - Fund 10B."*

Thank you,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Ghirlandi Guidetti

**Sent:** Wednesday, August 2, 2023 3:13 PM

**To:** 'Juan Romero' <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** RE: LARCA Folder with EWDD Settlement Related Expenses

**Importance:** High

Hello EWDD Team:

I understand that Juan is on a (well-earned) vacation. In his absence, I'm hoping someone else on the team can address the questions in my below email.

I also wanted to elevate the attached letter to which we requested a response by this Friday, August 4.

Thank you in advance,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005



(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID748biawHs3310Xd1&T=PBCL&HV=U,E,X,T&H=1dd500370ab10056c824dea946fdcf24d1b98527>

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**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Tuesday, July 25, 2023 2:06 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

I'm going on vacation starting tomorrow, but our EWDD Team will be reaching out to you regarding your email request. Thanks again.

On Mon, Jul 24, 2023 at 8:15 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Juan,

Thanks for passing on the expected timeframe for the missing data and sending us the GRYD and community organization list.

We are still reviewing the financial records provided to us and it is not clear what the city includes in the category "Administrative" and what it considers "Program Operations." Can you please help us understand this? For example, are the "Outreach, Marketing & Others" expenses in the document with the heading

"EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" considered "Program Operations" or Administrative"?

We are also having trouble reconciling the \$3.3 million total in the document with the heading "EWDD Costing for Gang Injunction Curfew Settlement- (LARCA 2.0)" with the \$2.8 million listed as expended by the city in the document with the heading "GANG INJUNCTION CURFEW (GIC) SETTLEMENT (LARCA 2.0) - Fund 10B."

Thanks in advance for explaining this to us.

Best,

**Ghirlandi Guidetti**

(213) 385-2977 x176

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**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Thursday, July 20, 2023 4:16 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Subject:** Re: LARCA Folder with EWDD Settlement Related Expenses

Hi Ghirlandi,

Hope all is well! Please see attachment of the GRYD and Community Organizations we're working with for PY 23-24. I apologize for the oversight

I'm also attaching Donny's email regarding the EWDD LARCA Cost and Program Financials for PY 22-23:

Hi Juan,

Please advise Public Counsel that the final EWDD Costs for Administrative and Program financial data for PY 22-23 ending June 30th is pending as there is a 45-60 day lag to complete the financial closeout report. This information is not yet available. Catherine and Tony, please advise if this is the appropriate response.

Thank you.

--

Donny Brooks

Assistant Chief Grants Administrator

Economic and Workforce Development Department  
1200 W. 7th St, 6th floor  
Los Angeles, CA 90017  
(213) 744-9093 wk  
(213) 744-9042 fax

[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)

On Thu, Jul 20, 2023 at 8:48 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Juan,

Thank you for providing these document. We are still in the process of reviewing them, but noted that the data is incomplete. For example, the PDF file titled "EWDD LARCA Costs for Admin. and Program (OPS)" with the heading "EWDD Costing For Gang Injunction Curfew Settlement- (LARCA 2.0): Administrative & Program Operations Cost" does not include year-to-date data for the current (year 6) program year. Instead, there is a note that "EWDD's fiscal unit is still working on compiling financial data for this prior PY 22-23."

We had agreed you would provide us all information, to date, by July 14. Please advise when we can expect the missing data. We would like to analyze a complete dataset before we discuss this matter again.

Relatedly, the documents you provided did not include the following, which you agreed to send us:

A list of the seven community based outreach partners you stated have been helping the WorkSource centers and providers better serve the class member population. Please include information about which EWDD contractor(s) each organization works with.

Thank you,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID748biawHs3310Xd1&T=PBCL&HV=U,E,X,T&H=1dd500370ab10056c824dea946fdcf24d1b98527>

**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Sent:** Friday, July 14, 2023 11:47 AM

**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Donny Brooks <[donny.brooks@lacity.org](mailto:donny.brooks@lacity.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Chris Lee <[Chris.N.Lee@lacity.org](mailto:Chris.N.Lee@lacity.org)>

**Cc:** Estrada, Tony <[tony.estrada@lacity.org](mailto:tony.estrada@lacity.org)>; Catherine Bondoc <[catherine.bondoc@lacity.org](mailto:catherine.bondoc@lacity.org)>

**Subject:** LARCA Folder with EWDD Settlement Related Expenses

Hi Stephanie and Team,

Hope all is well! please see the LARCA Folder with Financial Expenditure Documents that were requested by Public Counsel.

- LARCA Agencies Financial Expenditure Reports Folder - Agency Case Management Services and Participant Support Services Totals YTD (We're still collecting and consolidating May & June 2023 agency invoices)
- EWDD LARCA Cost for Admin & Program YTD.
- Updated LARCA Agency Settlement Expenses by Program Year
- Policy Support Service /Needs Related

Please let us know if you have any questions regarding the documents. Thanks again.

--

Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

(213) 744-9042 fax

[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

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--

Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

(213) 744-9042 fax

[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

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Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

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Juan Romero

LARCA Program

Sr. Project Coordinator

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**EXHIBIT U**

# CITY OF LOS ANGELES

CALIFORNIA

CAROLYN M. HULL  
GENERAL MANAGER



KAREN BASS  
MAYOR

## ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT

1200 W. 7<sup>TH</sup> STREET  
LOS ANGELES, CA 90017

January 9, 2023

Council File Number:  
Council Districts: All  
Contact Persons & Phone:  
Gerardo Ruvalcaba (213) 744-7233

The Honorable Karen Bass  
Mayor, City of Los Angeles  
Room 303, City Hall

City Council  
c/o City Clerk  
Room 395, City Hall

Attention: Heleen Ramirez, Legislative Coordinator

**TRANSMITTAL: APPROVAL OF REQUEST FROM THE ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT (EWDD) TO ALLOCATE \$2.75 MILLION TO THE GANG INJUNCTION CURFEW (RODRIGUEZ) SETTLEMENT PROGRAM**

### RECOMMENDATIONS

The General Manager of the Economic and Workforce Development Department (Department) respectfully requests that the City Council:

1. APPROVE the Department's recommendation to allocate \$2.75 million in additional funding to the Gang Injunction Curfew Settlement program, as follows:

a.	Service Providers	2,500,000
b.	City Costs	250,000
c.	Total	2,750,000

2. APPROVE the Department's recommended service provider allocations as outlined in Table 3;
3. AUTHORIZE the Department to amend agreements as outlined in Table 3 through June 27, 2023.

4. Authorize the Controller to:

- a. Transfer \$2.75 million from the City General Purpose Fund and/or the Unappropriated Balance to the Gang Injunction Curfew Settlement Fund No. 10B.
- b. Establish new within the Gang Injunction Curfew Settlement Fund No. 10B and appropriate as follows

Account	Title	Amount
22W122	Economic and Workforce Development	270,214
22W166	Personnel	4,786
22W887	Gang Injunction Curfew Settlement-City GF	2,475,000
<b>Total</b>		<b>2,750,000</b>

- c. Increase appropriations within Fund 100/22 as follows:

Account	Title	Amount
001010	Salaries General	200,885
001070	Salaries as Needed	11,208
001090	Overtime General	9,863
002120	Printing and Binding	27
002130	Travel	56
003040	Contractual Services	4,551
003310	Transportation	5
006010	Office and Administrative	3,869
006020	Operating Supplies	5
006030	Leasing	39,745
<b>Total</b>		<b>270,214</b>

- d. Increase appropriations within Fund 100/66 as follows:

Fund/Account	Title	Amount
001010	Salaries General	4,786

- 5. Authorize the General Manager of EWDD, or designee, to prepare Controller Instructions for any necessary technical adjustments, subject to the approval of the City Administrative Officer, and then instruct the Controller to implement the instructions.

**FISCAL IMPACT**

The recommendations contained herein will have an impact on the City General Purpose Fund through an increased appropriation of \$2.75 million for the Gang Injunction Curfew Settlement program (also known as LARCA 2.0).

**BACKGROUND**

The City Council allocated a maximum of \$30 million dollars in City General Purpose Funds over a four-year period for the Gang Injunction Curfew Settlement (Settlement) in the case of “Rodriguez vs. City of Los Angeles.” Approximately 6,000 plaintiff class members were impacted by the Settlement, which included twenty-six (26) gang injunction areas: 3 in the San Fernando Valley, 3 in West Los Angeles, 4 in Northeast Los

Angeles, 4 in Boyle Heights/East Los Angeles, 2 in Mid-City, 3 in Hollywood/Central Los Angeles, 6 in South Los Angeles, and 1 in Wilmington/Harbor.

The LARCA 2.0 incorporates best practice workforce development designs from the original LARCA model that targeted high-need and transitional populations and provided them education and career assessments, case management services, job readiness training, subsidized employment, financial literacy training and job placement services.

**DISCUSSION**

Since the inception of the program, City Council has appropriated a total of \$13.3 million from the \$30.0 million maximum allocation. Though the City committed to a maximum of \$7.5 million per year, the City only appropriated a portion of the total annual commitment to EWDD with the balance of funds appropriated in the Unappropriated Balance (UB) Budget. As a result, only \$13,301,863 of the original \$30.0 million have been made available to the program to date. Table 1 below provides a summary of funding appropriated by Fiscal Year:

**Table 1: Appropriations by Fiscal Year**

No.	Fiscal Year	Service Providers	EWDD Oversight	Total
1	FY2016-17	1,910,000	155,494	2,065,494
2	FY2017-18	2,030,259	596,807	2,627,066
3	FY2018-19	2,744,308	528,732	3,273,040
4	FY2019-20	374,054	689,474	1,063,528
5	FY2020-21	452,173	672,827	1,125,000
6	FY2021-22	2,500,000	359,303	2,859,303
7	FY 2022-23	0	288,432	288,432
<b>Total</b>		<b>10,010,794</b>	<b>3,291,069</b>	<b>13,301,863</b>

The Department’s ongoing community outreach efforts and “word of mouth” referrals in impacted communities continue to lead to significant increase in program enrollments. To date, the LARCA program has now enrolled a total of 987 participants, with 486 or 49 percent of all enrollments coming from PY 2020-2021 and PY 2021-2022. With five months left in the enrollment period, EWDD anticipates an additional 200 enrollments by the end of the program period, June 27, 2023. Table 2 below provides a summary of actual participant enrollments by Fiscal Year.

**Table 2: Enrollments**

No.	Fiscal Year	Total Enrollments
1	FY2016-2017	0
2	FY2017-2018	110
3	FY2018-2019	254
4	FY2019-2020	103
5	FY2020-2021	274
6	FY2021-2022	212
7	FY 2022-2023	34
<b>Total</b>		<b>987</b>

Based on pending invoices, service provider expenditures will surpass \$8 million by November 2022, leaving approximately \$2.0 million available through June 27, 2023. EWDD projects an additional \$2.75 million in expenditures through the end of the current program. In order to avoid disruption of services, EWDD is requesting that City Council authorize an additional \$2.75 million to successfully close-out the program. Furthermore, EWDD recommends that the \$2.75 million be distributed as outlined in Table 3:

**Table 3: Proposed Allocations**

	<b>Contractor</b>	<b>Current Funding</b>	<b>Total Invoiced to Date</b>	<b>Current Balance</b>	<b>New Allocation</b>	<b>Total</b>
1	Anti-Recidivism Coalition	0	0	0	0	0
2	Arbor E&T, LLC - Boyle Heights	22,099	22,099	0	0	22,099
3	Arbor E&T, LLC - Canoga Park	1,078,000	874,175	203,825	300,000	1,378,000
4	Asian American Drug Abuse Program, Inc.	855,644	702,355	153,289	200,000	1,055,644
5	Build Rehabilitation Industries	11,635	11,635	0	0	11,635
6	Catholic Charities	500,070	357,519	142,551	200,000	700,070
7	City of Long Beach (Pacific Gateway)	593,000	424,312	168,688	200,000	793,000
8	Coalition for Responsible Community Development	150,000	45,504	104,496	0	150,000
9	Community Career Development, Inc.	115,000	54,751	60,249	100,000	215,000
10	Downtown Women's Center	160,000	52,257	107,743	100,000	260,000
11	El Proyecto del Barrio, Inc.	480,000	404,586	75,414	300,000	780,000
12	Friends Outside in Los Angeles County	21,356	21,356	0	0	21,356
13	Goodwill Industries of Southern California	959,700	827,980	131,720	300,000	1,259,700
14	Homeboy Industries	177,604	177,604	0	0	177,604
15	Housing Authority of the City of Los Angeles	2,119,529	1,587,925	531,604	0	2,119,529

16	Jewish Vocational Service	275,000	216,110	58,890	200,000	475,000
17	Los Angeles Conservation Corps, Inc.	31,753	29,900	1,853	0	31,753
18	Managed Career Solutions, Inc.	738,000	781,494	(43,494)	300,000	1,038,000
19	Pacific Asian Consortium in Employment	426,736	302,188	124,548	200,000	626,736
20	UAW-Labor Employment and Training Corporation	265,000	138,697	126,303	100,000	365,000
21	Watts Labor Community Action Committee	20,938	20,938	0	0	20,938
22	Youth Policy Institute, Inc.	0	0	0	0	0
23	H.E.L.P.E.R Foundation	100,000	100,000	0	0	100,000
24	Homeboy Industries (Tattoo Removal)	50,000	28,024	21,976	0	50,000
25	CSUN Evaluation Services	664,259	586,409	77,850	0	664,259
26	Professional Development: Homeboy Industries	20,000	13,413	6,587	0	20,000
27	Professional Development: HELPER Foundation	20,000	18,857	1,143	0	20,000
28	Outreach & Marketing	155,471	155,471	0	0	155,471
<b>Total</b>		<b>10,010,794</b>	<b>7,955,559</b>	<b>2,055,235</b>	<b>2,500,000</b>	<b>12,510,794</b>

*Carolyn Hull*  
 CAROLYN M. HULL  
 General Manager

*Charles Woo*  
 CHARLES WOO, Chief  
 Workforce Development Board

CMH:GR:RR:cg

**EXHIBIT V**

**REPORT** FROM

## OFFICE OF THE CITY ADMINISTRATIVE OFFICER

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Date: **March 9, 2023**

CAO File No. 0220-05667-0002  
Council File No. 16-0081-S3  
Council District: All

To: The Council  
The Mayor

From: *for* Matthew W. Szabo, City Administrative Officer 

Reference: Economic and Workforce Development Department Transmittal dated January 9, 2023; additional information received through March 6, 2023

Subject: **REQUEST FROM THE ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT TO ALLOCATE \$2.75 MILLION TO THE GANG INJUNCTION CURFEW SETTLEMENT PROGRAM FOR FISCAL YEAR 2022-23**

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### RECOMMENDATIONS

That the Council, subject to the approval of the Mayor:

1. NOTE AND FILE the transmittal from the Economic and Workforce Development Department dated January 9, 2023; and
2. INSTRUCT the General Manager of the Economic and Workforce Development Department, or designee, to report any available savings or additional funding need for the Gang Injunction Curfew Settlement Agreement after the program ends on June 27, 2023.

### SUMMARY

The Gang Injunction Curfew Settlement Agreement (GICSA) (C.F. 16-0081) was executed and approved by the federal court in April 2017. The GICSA obligated the City, through the Economic and Workforce Development Department (EWDD), to provide a variety of work-readiness and employment services over four years to help prepare members of the impacted plaintiff class (or their qualifying designees) to enter the workforce. The number of potentially qualifying participants is approximately 6,000. The City was required to expend a minimum of \$1.125 million to a maximum of \$7.5 million each year for four years to provide jobs, education, and tattoo removal services. EWDD's program design incorporates best practices from a previous workforce development program known as the Los Angeles Reconnections Academy (LARCA), which includes education and career assessments, case management services, job readiness training, subsidized employment, financial literacy training, and job placement services. In June 2017, as part of the Program Year 2017-18 Workforce Development Board Annual Plan, the Council and Mayor



approved authority for EWDD to procure service providers and negotiate and execute agreements to implement City services under the legally-mandated GICSA (C.F. 17-0635). From Fiscal Year (FY) 2016-17 to date, the City has provided a total of \$13,181,689 from the General Fund to implement the GICSA.

The EWDD transmittal dated January 9, 2023 requests an additional \$2.75 million in funding to meet anticipated needs through June 27, 2023. It should be noted that although the EWDD report references a \$30 million maximum allocation appropriated by Council, there is no funding in the FY 2022-23 Adopted Budget for this purpose. Instead, it was the Council’s instruction for EWDD to expend no less than \$4.5 million and no more than \$30 million over the four-year settlement period. There is no funding reserved in the Unappropriated Balance for this purpose since the end of the original settlement period in June 2021, when the City satisfied its obligations under the GICSA. Approval of EWDD’s interim request would have a \$2.75 million General Fund impact.

The original GICSA program operated from June 1, 2017 to June 27, 2021. The program has been extended three times: from June 27, 2021 through December 27, 2021, from December 27, 2021 through June 27, 2022, and finally, from June 27, 2022 through June 27, 2023 (C.F. 17-0026). Potential participants have until March 27, 2023 to enroll under the agreement, and the contracted services performed under the program will end on June 27, 2023. EWDD has not requested that Council extend the GICSA program beyond the June 27, 2023 expiration date; and has not submitted a budget request for any funding or positions for FY 2023-24.

EWDD reimburses contractual expenses following the receipt and processing of invoices, and expends from the balance of funds on a rolling basis. In December 2021, the EWDD reported an ongoing increase in enrollments and corresponding expenditures, and requested \$2.75 million to meet projected funding needs through the end of the second approved program extension (through June 27, 2022). The Council and Mayor approved this funding in April 2022, and instructed that any uncommitted funds that were available at the close of June 2022 be used to support funding needs for the third program extension period, from June 27, 2022 through June 27, 2023 (C.F. 16-0081-S3). The EWDD transmittal dated January 9, 2023 anticipates over 200 additional enrollments by March 27, 2023, and an additional cost of \$2.75 million to avoid disruption of services through the end of the third extension period. The following table summarizes enrollments and expenses by FY for the GICSA Program. Program expenses include expenses reported in this Office’s February 2022 report, plus additional “pending invoices” as reported by EWDD to the CAO in February 2023. The enrollment figures also reflect the most recent data available from EWDD through February 2023. Based on the EWDD transmittal, historical data, and supplemental information received from EWDD, this Office anticipates no more than 30 additional enrollments by the March 27, 2023 enrollment deadline, or 114 total participants in FY 2022-23.

Fiscal Year	Enrollments	Program Expenses
2016-17	0	\$1,592,536
2017-18	110	1,981,475
2018-19	254	1,799,329
2019-20	103	1,200,211
2020-21	274	3,639,445

2021-22	212	1,790,196
2022-23*	84	66,314
<b>Total</b>	<b>1,037</b>	<b>\$12,069,506</b>

\*Data through February 28, 2023.

EWDD estimated that the additional funding requested in the January 9, 2023 transmittal would allow the program to enroll up to 200 participants in this final program year, and estimated the total program cost for 2022-23 at \$1.8 million using that enrollment level. This Office does not recommend providing additional funding to this program at this time since there is less than one month remaining for enrollments and less than three months remaining for program operations. This Office projects total expenses of approximately \$1.14 million for FY 2022-23 utilizing a projected enrollment of no more than 114 participants. This estimate brings the total anticipated program expenditures to \$13,143,192<sup>1</sup>, which is less than the total General Fund allocation to date of \$13,181,689. As such, this Office determined there is sufficient funding for the program at this time.

EWDD states that there is a significant backlog of pending invoices for this program that contribute to the estimated higher funding need. This Office was unable to verify expenditure estimates exceeding the \$13,181,689 General Fund allocation to date. EWDD currently has approximately \$2.4 million in encumbered funds available within the Gang Injunction Settlement Fund to pay down invoices on the existing contracts under this program, and approximately \$650,000 in uncommitted funds within that Fund that could be utilized for additional expenses or needs related to the program. This Office does not recommend any additional funding allocation at this time. Given the imminent expiration of the program, it is recommended that EWDD report back with any additional funding needed to satisfy any outstanding invoices and complete the program close-out after June 27, 2023.

**FISCAL IMPACT STATEMENT**

The recommendations stated in this report will have no impact to the General Fund. Approval of the request for funding by the Economic and Workforce Development Department (EWDD) as stated in the January 9, 2023 transmittal would have a \$2.75 million impact to the General Fund. The 2022-23 Adopted Budget did not allocate any funding to the Gang Injunction Settlement Program in either the General City Purposes budget or the Unappropriated Balance. Should the Council approve additional funding needs, this will impact the 2022-23 Unappropriated Balance.

**FINANCIAL POLICIES STATEMENT**

The recommendations stated in this report comply with the City’s Financial Policies inasmuch as the Unappropriated Balance, Reserve for Mid-Year Adjustments, is used to address shortfalls that arise during the year. Additionally, changes to budget appropriations during the fiscal year shall be limited and subject to the review and approval of the Mayor and the City Council.

MWS:SRB:02230063

<sup>1</sup> The estimate is based on an average cost of \$10,000 per participant in 2022-23.

**EXHIBIT W**

**REPORT** FROM

## OFFICE OF THE CITY ADMINISTRATIVE OFFICER

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**Date:** April 14, 2023

CAO File No. 0220-05667-0003  
Council File No. 16-0081-S3  
Council District: All

**To:** The Council  
The Mayor

**From:** *Yolanda Chaniz*  
for Matthew W. Szabo, City Administrative Officer

**Reference:** Transmittal from the Economic and Workforce Development Department dated January 9, 2023; additional information received through April 12, 2023

**Subject:** **AMENDED REQUEST FROM THE ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT TO ALLOCATE ADDITIONAL FUNDING TO THE GANG INJUNCTION CURFEW SETTLEMENT PROGRAM FOR FISCAL YEAR 2022-23**

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### RECOMMENDATIONS

That the Council, subject to the approval of the Mayor:

1. NOTE AND FILE the transmittal from the Economic and Workforce Development Department dated January 9, 2023;
2. APPROVE the funding recommendation of \$1,200,000 to support ongoing Gang Injunction Curfew Settlement Program expenses through the current program year ending June 27, 2023;
3. APPROVE the service provider allocations provided by the Economic and Workforce Development Department in the Attachment to this report;
4. AUTHORIZE the Controller to:
  - a. Establish a new account, No. 22W887, titled "Gang Injunction Curfew Settlement – City General Fund" within the Gang Injunction Curfew Settlement Fund No. 10B;
  - b. Transfer \$1,200,000 from the Reserve Fund No. 101/62 to the Unappropriated Balance Fund No. 100/58 and appropriate therefrom to the Gang Injunction Curfew Settlement Fund No. 10B/22, Account No. 22W887, Gang Injunction Curfew Settlement – City General Fund;
5. AUTHORIZE the General Manager of the Economic and Workforce Development Department, or designee, to:

- a. Amend agreements with service providers, as provided by the Economic and Workforce Development Department in the Attachment to this report, subject to City Attorney review and approval as to form, legality, and procurement, and in compliance with the Workforce Development Board – Local Elected Officials (WDB-LEO) Agreement, City grant regulations, and City contracting requirements; and,
- b. Prepare Controller instructions for any technical adjustments, subject to the approval of the City Administrative Officer, and authorize the Controller to implement the instructions.

## SUMMARY

This report replaces the previous report on this matter released by this Office on March 9, 2023.

The Gang Injunction Curfew Settlement Agreement (GICSA) (C.F. 16-0081) was executed and approved by the federal court in April 2017. The GICSA obligated the City, through the Economic and Workforce Development Department (EWDD), to provide a variety of work-readiness and employment services over four years to help prepare members of the impacted plaintiff class (or their qualifying designees) to enter the workforce. The number of potentially qualifying participants is approximately 6,000. The City was required to expend a minimum of \$1.125 million to a maximum of \$7.5 million each year for four years to provide jobs, education, and tattoo removal services.

EWDD's program design incorporates best practices from a previous workforce development program known as the Los Angeles Reconnections Academy (LARCA), which includes education and career assessments, case management services, job readiness training, subsidized employment, financial literacy training, and job placement services. In June 2017, as part of the Program Year 2017-18 Workforce Development Board Annual Plan, the Council and Mayor approved authority for EWDD to procure service providers and negotiate and execute agreements to implement City services under the legally-mandated GICSA (C.F. 17-0635). From Fiscal Year (FY) 2016-17 to date, the City has provided a total of \$13,181,689 from the General Fund to implement the GICSA. The original GICSA program operated from June 1, 2017 to June 27, 2021. The program has been extended three times: from June 27, 2021 through December 27, 2021, from December 27, 2021 through June 27, 2022, and finally, from June 27, 2022 through June 27, 2023 (C.F. 17-0026).

Under the most recent program extension, potential participants had until March 27, 2023 to enroll under the agreement, and the contracted services performed under the program are set to end on June 27, 2023. Subsequent to the release of the EWDD transmittal dated January 9, 2023, Council adopted an extension to only the enrollment period, from the original end date of March 27, 2023 (C.F. 17-0026-S1). This enrollment extension allows three additional months for potential participants to enroll in the program and aligns with the GICSA program end date of June 27, 2023.

Based on the EWDD transmittal, historical data, and supplemental information received from EWDD, this Office determined that EWDD had sufficient funding to meet the need for new enrollees through March 27, 2023. However, due to the extension of the enrollment period, EWDD and this

Office concur that it is appropriate to allocate additional funding to meet the need for additional enrollees through June 27, 2023. With an anticipated 120 potential additional enrollments through June 27, 2023, at an average cost of \$10,000 per participant, the anticipated funding need through the end of the fiscal year is \$1.2 million. The Attachment to this report provides funding recommendations to reallocate existing program funds between service providers, and to provide new allocations from the \$1.2 million in additional funding. Funding is being recommended from the Reserve Fund due to the legal obligation the City has to meet the terms of the GICSA, and the unavailability of additional funding the Unappropriated Balance, Reserve for Mid-Year Adjustments account.

There is a Motion (Hernandez – McOsker – Price, C.F. 17-0026-S1) pending before Council to consider a fourth extension to the program, from June 27, 2023 through June 27, 2025. Should the Council and the Mayor approve an additional extension to the program, EWDD projects the cost of each additional program year would be \$6,000,000, not including expenses for outreach services. This Office has advised the EWDD to submit a request for funding for any additional program years, if approved, to the Council for consideration as part of the Budget, Finance, and Innovation Committee’s deliberations on the Mayor’s 2023-24 Proposed Budget.

It should be noted that although the EWDD transmittal dated January 9, 2023 references a \$30 million maximum allocation appropriated by Council, there is no funding in the FY 2022-23 Adopted Budget for this purpose. Instead, it was the Council’s instruction for EWDD to expend no less than \$4.5 million and no more than \$30 million over the four-year settlement period. There is no funding reserved in the Unappropriated Balance for this purpose since the end of the original settlement period was in June 2021, when the City satisfied its obligations under the original GICSA program.

EWDD reimburses contractual expenses following the receipt and processing of invoices, and expends from the balance of funds on a rolling basis. In December 2021, the EWDD reported an ongoing increase in enrollments and corresponding expenditures, and requested \$2.75 million to meet projected funding needs through the end of the second approved program extension (through June 27, 2022). The Council and Mayor approved this funding in April 2022, and instructed that any uncommitted funds that were available at the close of June 2022 be used to support funding needs for the third program extension period, from June 27, 2022 through June 27, 2023 (C.F. 16-0081-S3). The following table summarizes enrollments and expenses by FY for the GICSA Program. Program expenses include expenses reported in this Office’s February 2022 report, plus additional “pending invoices” as reported by EWDD to the CAO in February 2023.

<b>Fiscal Year</b>	<b>Enrollments</b>	<b>Program Expenses</b>
2016-17	0	\$1,592,536
2017-18	110	1,981,475
2018-19	254	1,799,329
2019-20	103	1,200,211
2020-21	274	3,639,445
2021-22	212	1,790,196
2022-23*	84	66,314
<b>Total</b>	<b>1,037</b>	<b>\$12,069,506</b>

\*Data through February 28, 2023.

Funding available in the Gang Injunction Curfew Settlement Fund remains in the fund at the close of each fiscal year. This Office recommends that any uncommitted funds from the \$1,200,000 recommended in this report that are available at the close of the current fiscal year ending June 30, 2023 be used to support funding needs for the fourth program extension period, if it is approved.

In accordance with the Workforce Development Board – Local Elected Officials (WDB – LEO) agreement (C.F. 16-0475 and C.F 12-0602-S5), the funding recommendations included in this report exceed the \$250,000 threshold for WDB approvals and thus must also be approved by the Council and the Mayor. Additionally, Charter Section 341 requires Council approval for transfers from the Reserve Fund.

### **FISCAL IMPACT STATEMENT**

The recommendations stated in this report transfer \$1,200,000 from the Reserve Fund to the Gang Injunction Curfew Settlement Fund, thereby also increasing General Fund appropriations by \$1,200,000. The 2022-23 Adopted Budget did not allocate any funding to the Gang Injunction Settlement Program in either the General City Purposes budget or the Unappropriated Balance.

### **FINANCIAL POLICIES STATEMENT**

The City's Financial Policies discourage the expansion of programs outside of the annual budget process, as we have recommended to do in this report. By adopting the recommendations in this report, the City Council and Mayor acknowledge that expanding the program at this time meets a pressing need that requires immediate action

*MWS:SRB:02230092*

Attachment

#15448

## ATTACHMENT

Economic and Workforce Development Department

Gang Injunction Curfew Settlement Program

Reprogramming and New Allocation Recommendations and Revised Contract Amounts for Service Providers

EWDD Ref. No.	Service Provider	Current Contract Amount	Reprogram Existing Funds	New Allocation	Revised Contract Amount
1	Arbor E&T, LLC - Boyle Heights	22,099	-	-	22,099
2	Arbor E&T, LLC - Canoga Park	1,078,000	-	280,000	1,358,000
3	Asian American Drug Abuse Program, Inc.	855,644	-	150,000	1,005,644
4	Build Rehabilitation Industries	11,635	-	-	11,635
5	Catholic Charities	500,070	-	220,000	720,070
6	City of Long Beach (Pacific Gateway)	593,000	-	80,000	673,000
7	Coalition for Responsible Community Development	150,000	(6,174)	-	143,826
8	Community Career Development, Inc.	115,000	(50,478)	-	64,522
9	Downtown Women's Center	160,000	(87,743)	-	72,257
10	El Proyecto del Barrio, Inc.	480,000	122,016	-	602,016
11	Friends Outside in Los Angeles County	21,356	(910)	-	20,446
12	Goodwill Industries of Southern California	959,700	-	120,000	1,079,700
13	Homeboy Industries	177,604	(1,431)	-	176,173
14	Housing Authority of the City of Los Angeles	2,119,529	-	100,000	2,219,529
15	Jewish Vocational Service	275,000	-	100,000	375,000
16	Los Angeles Conservation Corps, Inc.	31,753	(1,853)	-	29,900
17	Managed Career Solutions, Inc.	738,000	39,092	-	777,092
18	Pacific Asian Consortium in Employment	426,736	-	70,000	496,736
19	UAW-Labor Employment & Training Corporation	265,000	-	80,000	345,000
20	Watts Labor Community Action Committee	20,938	(4,789)	-	16,149
21	H.E.L.P.E.R Foundation	100,000	-	-	100,000
22	Homeboy Industries (Tattoo Removal)	50,000	-	-	50,000
23	CSUN Evaluation Services: The University	664,259	-	-	664,259
24	Professional Development: Homeboy Industries	20,000	(6,587)	-	13,413
25	Professional Development: HELPER Foundation	20,000	(1,143)	-	18,857
26	Outreach/Marketing (Multiple Contracts)	155,471	-	-	155,471
<b>Total</b>		<b>10,010,794</b>	<b>-</b>	<b>1,200,000</b>	<b>11,210,794</b>



**EXHIBIT X**



*Employability  
Competency  
System*

# ECS Appraisal

Form **130**  
Reading/  
Math



**CASAS**

### DIRECTIONS

1. Please do not write in the test booklet. Mark your answers only on the answer sheet.
  2. Use number 2 pencil only. Do not use ink. If you want to change an answer, be sure to erase the first mark completely.
  3. Read and follow all directions carefully. Try to answer each question. Choose the one best answer.
- 

### PRACTICE

**Example 1** Refer to the sign to answer practice question 1.

**DO NOT ENTER**

What does this sign mean?

- A. Go in here.
- B. Go out here.
- C. Don't go in.
- D. Come back later.

**PRACTICE**

A	B	<input checked="" type="radio"/>	D
A	<input checked="" type="radio"/>	C	D

**Example 2** Read the ad and answer practice question 2.

CLERICAL -- Part time, p.m. hours,  
in busy office. Call 312-2222.

When will this person work?

- A. in the morning
- B. in the afternoon
- C. after midnight
- D. all day

DATA ENTRY: H.S. grad, 2 yrs. exp. desired.  
40 wpm, familiar w/ofc. equip., FT, M-F, 9-5,  
\$7.50 per hr. Apply in person bet. 9 & 10 a.m.,  
by Oct. 30. Zapisek Co. No calls.

- 
- |   |   |
|---|---|
| <p>1. How many days a week would a person work at this job?</p> <ul style="list-style-type: none"><li>A. two</li><li>B. three</li><li>C. five</li><li>D. seven</li></ul> <p>2. How should an applicant apply for this job?</p> <ul style="list-style-type: none"><li>A. by telephone</li><li>B. in person</li><li>C. with a résumé</li><li>D. with a letter</li></ul> | <p>3. A minimum of how much education is required for this job?</p> <ul style="list-style-type: none"><li>A. high school diploma</li><li>B. elementary school</li><li>C. two years of college</li><li>D. There are no educational requirements specified.</li></ul> |
|---|---|

<b>EMPLOYEE'S PERSONNEL RECORD</b>									
EMPLOYEE NAME <u>Johnson</u> <u>Sam</u> <u>M.</u>		PAYROLL/CLOCK NO. <u>150</u>		HIRE DATE <u>8/1/89</u>					
LAST		FIRST		MIDDLE					
SECURITY CLEARANCE LEVEL <u>2</u>				DATE GRANTED <u>7/2/98</u>					
<b>PAYROLL DATA</b>									
BIRTH DATE <u>5/1/67</u>		SOC. SEC. NO. <u>767-83-9022</u>							
M <input checked="" type="checkbox"/> F <input type="checkbox"/>		MARITAL STATUS <u>married</u>							
DEPENDENTS FOR WITHHOLDING: FEDERAL <u>4</u>		STATE <u>4</u>							
AMOUNT WITHHELD (DOLLARS) FEDERAL <u>149.48</u>		STATE <u>31.08</u>							
DEDUCTIONS: BONDS _____ UF _____ GROUP INS. _____									
<b>GENERAL INFORMATION</b>									
EDUCATION									
ELEM. <u>1979</u>		JHS <u>1981</u>		SHS _____					
COLLEGE 1 2 3 4				MAJOR _____					
OTHER <u>GED Certificate 1995</u>									
SPECIAL SKILLS									
ADDRESS									
<u>102</u>		<u>N. 3rd St.</u>		<u>San Jose</u>		<u>CA</u>		<u>95071</u>	
NO.		STREET		CITY		STATE		ZIP	
(408) 333-1212									
TELEPHONE									
NOTIFY IN EMERGENCY									
<u>Sarah Johnson</u>					<u>Wife</u>				
NAME					RELATIONSHIP				
<u>Same as above</u>									
NO.		STREET		CITY		STATE		ZIP	
TELEPHONE									
<b>EMPLOYMENT RECORD</b>									
CONFIDENTIAL DATA SHOULD BE FILED ELSEWHERE TO PROTECT EMPLOYEES' PRIVACY RIGHTS						E - EXCELLENT G - GOOD F - FAIR P - POOR		WORK LIMITATIONS	
EFFECTIVE DATE	CLASSIFICATION	DEPARTMENT	RATE OF PAY		RATING				REASON FOR CHANGE
			AMOUNT	PER	Q U A L I T Y	Q U A N T I T Y	A T T I T U D E	A T T E N D A N C E	
8/1/89	Warehouse Trainee	Electronics	6	50 hr.	E	E	E	E	Completed training
3/1/90	Warehouse Stockman	Electronics	7	80 hr.	E	E	E	E	Promoted to fill vacancy
6/4/95	Warehouse Leadman	Electronics	11	60 hr.	E	E	E	E	Best person on staff for job
7/2/98	Warehouse Foreman	Electronics	15	60 hr.	E	E	E	E	

Refer to the record on the opposite page to answer questions 4, 5 and 6.

- 
4. In which of Sam Johnson's positions with the company did he earn the highest wage?
    - A. warehouse trainee
    - B. warehouse stockperson
    - C. warehouse leadman
    - D. warehouse foreman
  
  5. In which month did Sam Johnson begin his work as the warehouse leadman?
    - A. August
    - B. June
    - C. March
    - D. July
  
  6. How long had Mr. Johnson been eligible for union status before he joined the union?
    - A. one month
    - B. one year
    - C. one day
    - D. one week

Read the letter and answer questions 7, 8 and 9.

1722 Russell Circle  
San Diego, CA 92301  
May 20, 1998

Ms. Pat Dixon  
P.O. Box 92  
Lakeside, CA 92040

Dear Ms. Dixon:

In answer to your advertisement for a child care worker in last Sunday's *Newstime*, I would like to apply for the position. I am 18 years old and about to graduate from Bradley High School.

At present, I am working part time at the Bradley Child Care Center. My supervisor there is Mrs. Betty Johnson.

I plan to work full time after graduation and would like to learn more about caring for children. May I have an interview at your convenience? I am sure I could do a good job for you as a child-care worker.

Sincerely yours,

*Bonnie Smith*  
Bonnie Smith

7. Which of the following information does Bonnie Smith include in her letter?
- A. her present job, marital status, and reason for wanting the job
  - B. her education, phone number, and past jobs
  - C. her age, education, and present job
  - D. her address, phone number, and date of graduation
8. Where did Bonnie Smith find out about the child-care job?
- A. Bradley High School
  - B. her supervisor, Betty Johnson
  - C. the Sunday newspaper
  - D. Bradley Child Care Center
9. What information does Bonnie give concerning the dates she has worked at her present job?
- A. She has worked there for one year.
  - B. She has worked there throughout high school.
  - C. She is working full time.
  - D. She does not say.

Read the letter and answer questions 7, 8 and 9.

1722 Russell Circle  
San Diego, CA 92301  
May 20, 1998

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  - D. She does not say.



Refer to the form to answer questions 10 and 11.

PLEASE PRINT		MEDICAL HISTORY		
1. Name	_____	_____	_____	_____
	Last	First	Middle	
2. Address	_____			
	Street and Number	City	State	Zip
3. Are you now or have you been under medical care within the past year? (Answer yes or no. If yes, describe the kind of care you are receiving or did receive.)	_____			
	_____			
4. Do you have any physical disorder that might prevent you from taking part in strenuous work activity? (Answer yes or no. If yes, explain.)	_____			
	_____			
5. Are you now or have you been under the care of a mental health professional? (Answer yes or no. If yes, describe the kind of care you are receiving or did receive.)	_____			
	_____			
6. Have you ever had a major operation? (Answer yes or no. If yes, explain.)	_____			
	_____			
7. Have you been protected by inoculation or vaccination against: (Check <input checked="" type="checkbox"/> )	_____			
	<input type="checkbox"/> diphtheria	<input type="checkbox"/> polio	<input type="checkbox"/> typhoid	
8. Are you subject to: (Check <input checked="" type="checkbox"/> )	_____			
	<input type="checkbox"/> headaches	<input type="checkbox"/> fainting spells	<input type="checkbox"/> nosebleeds	<input type="checkbox"/> tonsillitis
9. Have you ever had: (Check <input checked="" type="checkbox"/> . If yes, briefly explain on line 10 below.)	_____			
	<input type="checkbox"/> hay fever	<input type="checkbox"/> skin rashes	<input type="checkbox"/> joint pains	<input type="checkbox"/> scarlet fever
	<input type="checkbox"/> measles	<input type="checkbox"/> polio	<input type="checkbox"/> typhoid fever	<input type="checkbox"/> mumps
	<input type="checkbox"/> heart trouble	<input type="checkbox"/> chicken pox	<input type="checkbox"/> asthma	<input type="checkbox"/> ear trouble
	<input type="checkbox"/> diphtheria	<input type="checkbox"/> eye trouble	<input type="checkbox"/> diabetes	<input type="checkbox"/> sinus trouble
	<input type="checkbox"/> drug reactions	<input type="checkbox"/> epilepsy	<input type="checkbox"/> allergies	<input type="checkbox"/> pneumonia
10.	_____			
11. Applicant's Signature	_____			

10. Where on the medical history form should you explain that you are allergic to the drug penicillin?

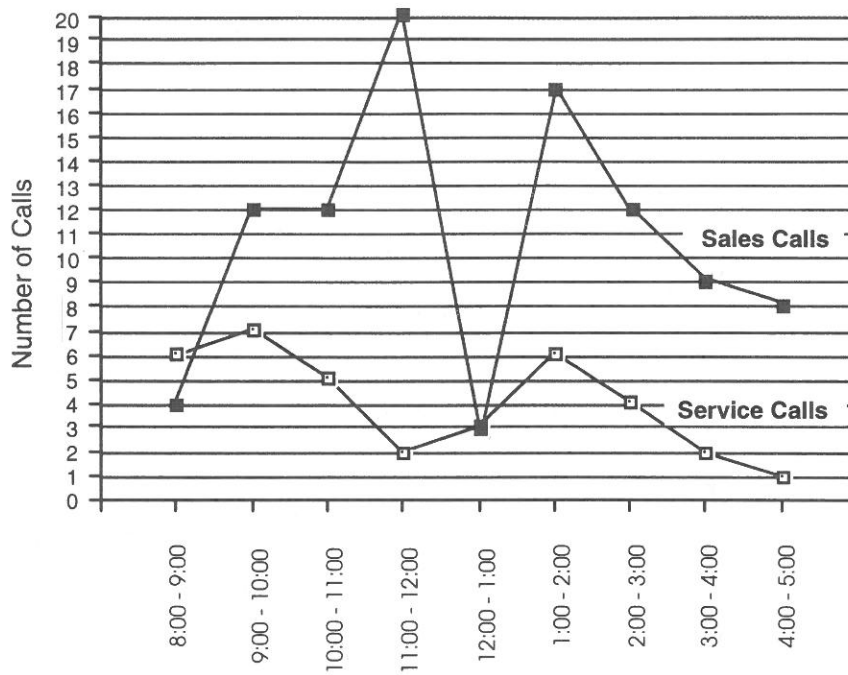
- A. line 5
- B. line 8
- C. line 10
- D. line 11

11. Where on the medical history form should you explain that you have a back injury that prevents you from lifting heavy objects?

- A. line 3
- B. line 4
- C. line 5
- D. line 6

Refer to the graph to answer questions 12 and 13.

Record of Telephone Activity



12. At what time were the number of sales calls and service calls the same?

- A. 10:00 - 11:00 a.m.
- B. 12:00 - 1:00 p.m.
- C. 2:00 - 3:00 p.m.
- D. 4:00 - 5:00 p.m.

13. At what time did the number of sales calls per hour remain the same?

- A. between 9:00 and 11:00 a.m.
- B. between 1:00 and 3:00 p.m.
- C. between 2:00 and 4:00 p.m.
- D. between 3:00 and 5:00 p.m.

Read the information and answer questions 14 and 15.

### SOLICITING AND VENDING

Employees may not engage in commercial soliciting or vending of any kind in or on this company property. This prohibition includes:

1. business or promotion activities, such as sale of jewelry, clothing, appliances, greeting cards, cosmetics, or other commercial products; and
2. soliciting for religious, charitable, fraternal, social or other community organizations.

The prohibition does not apply to authorized personal notices posted on bulletin boards or to officially sponsored or approved activities such as national or local health and welfare fund campaigns and officially authorized activities conducted by employee welfare and recreation associations.

14. Mary has a small cosmetics business in addition to her regular job. What is the rule regarding selling cosmetics to her fellow employees?
- A. It is not prohibited on company property.
  - B. It is prohibited on company property.
  - C. It is not prohibited in her department.
  - D. It is prohibited outside the company property.

15. Which of the following are the employees allowed to do?
- A. post authorized personal notices on the bulletin board
  - B. engage in minor commercial activity on company property
  - C. engage in promotion activities on company property
  - D. collect money for unauthorized social organizations on company property

Read the article and answer questions 16, 17 and 18.

Collective bargaining between miners and their employer, Pittston, began 20 months ago. It has become a test of wills.

The three-year contract imposed on the miners by Pittston increases their pay by 90 cents per hour. Their \$35,000-a-year average income already makes them the region's highest paid group. But miners don't like contract provisions that cut health and pension benefits.

Pittston says the cuts in labor costs are crucial. Foreign competition is wiping out gains from their recent capital-spending program (\$140 million). That program invested in equipment that greatly increased coal output. At

current labor costs, Pittston says it is unable to match the \$60-per-ton price charged by Poland, China, and other top exporters.

Leaders of the United Mine Workers say such talk is a smoke screen for union busting. This fear has triggered wildcat strikes and brought United Steelworkers to support the miners. At UMW's headquarters, President Richard Trumka says, "If they aren't trying to break the union, then none of the things they are doing makes sense."

In addition to reducing miners' benefits, Pittston seeks the right to hire nonunion workers. The firm also wants miners to work Sundays.

- 
- |  |   |
|--|---|
| <p>16. Why are the miners unhappy with the three-year contract offered by Pittston?</p> <ul style="list-style-type: none"><li>A. The contract doesn't increase their pay.</li><li>B. The miners want Pittston to hire nonunion workers.</li><li>C. The contract reduces health and pension benefits.</li><li>D. The miners' average income is below that of other wage earners in the region.</li></ul> <p>17. Why does Pittston say it wants to reduce its labor costs?</p> <ul style="list-style-type: none"><li>A. to remain competitive with foreign producers</li><li>B. to break up the union and its labor agreements</li><li>C. to pay for new equipment</li><li>D. to export more steel</li></ul> | <p>18. What action did some of the mineworkers take in response to Pittston's contract?</p> <ul style="list-style-type: none"><li>A. They negotiated a new contract.</li><li>B. They accepted Pittston's contract.</li><li>C. They went on strike.</li><li>D. They welcomed nonunion workers.</li></ul> |
|--|---|

Read the information and answer questions 19 and 20.

### Licensed Practical Nurse (LPN)

#### Duties

As one who cares for ill, injured, convalescent, and handicapped persons, the licensed practical nurse works in clinics, private homes, hospitals, sanitariums, and rest homes. The LPN records the patient's blood pressure, pulse, and temperature, dresses wounds, and gives medications and injections under a doctor's orders. The LPN may perform simple laboratory work, sterilize equipment, and prepare food trays and feed those patients too weak to eat by themselves. Other duties may include bathing and dressing patients, and keeping their beds and bed areas neat and clean. After a patient has been sent home, the practical nurse provides care until the patient is stronger and then instructs the family on providing further care.

19. What is one of the duties of an LPN?

- A. doing difficult laboratory tests
- B. diagnosing patients' illnesses
- C. carrying out doctors' directions
- D. prescribing medication

20. According to the information, what kind of writing does a licensed practical nurse do on the job?

- A. reports describing the patient's health
- B. numbers relating to the patient's condition
- C. stories about experiences in the hospital
- D. There is no writing on the job at all.

Read the information and answer questions 21 and 22.

### WHY GET A DIPLOMA?

Here are some of the reasons why a high school diploma is important for getting employment:

- Industry today is using more complicated machinery and equipment. Employers want machines to be operated by people who understand them and use them correctly.
- Employers believe that a person with a diploma is someone who can finish a job.
- People without a diploma are competing for jobs against high school graduates. If given a choice, the employer will hire the graduate.
- People with high school diplomas start at a higher rate of pay and advance more quickly.
- A high school graduate earns \$50,000 to \$60,000 more during a lifetime than a person without a diploma.

---

21. According to the information, what does the possession of a high school diploma show employers?

- A. The person can finish a job he or she starts.
- B. The person can start out with a high pay rate.
- C. The person can operate complicated machinery.
- D. The person is trained for the job.

22. According to the information, which of these statements is true?

- A. A high school graduate will earn \$50,000 to \$60,000 a year.
- B. People without diplomas are hired and fired first.
- C. People with diplomas compete with those who do not have them.
- D. Employers prefer persons without a diploma.

Read the information and answer questions 23, 24 and 25.

### Occupational Staffing Patterns

The Bureau of Labor Statistics has determined that there are six major reasons for changes in the job market. Here, in order of importance, are the main factors underlying most of the expected changes in jobs, with examples of their consequences.

1. Computers and other Technology: More jobs develop in gathering and working with information. Factory jobs get harder to find.
2. Business Practices: Experts and money managers are needed to maximize profits in a world market. Low-paying jobs go overseas to save more on labor costs.
3. Research and Development: New products are needed for companies to continue making profits. Scientists are employed to find solutions to environmental pollution.
4. Demographic Change: The aging population needs care and services. Secondary school teachers are needed for the increasing number of youth.
5. Medical Care: Increased costs boost outpatient and home care, creating jobs for physical and occupational therapists.
6. Law: Growing concern for personal safety brings more work for officers of the law, lawyers, paralegals, correctional facilities staff, and probation officers.

23. According to the above factors, which job should show increased opportunity for employment?

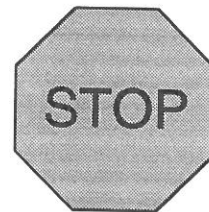
- A. agricultural picker and sorter
- B. licensed vocational nurse
- C. assembly line worker
- D. garment worker

24. Which of the following would result from the most important factor for employment change?

- A. Biotechnology firms hire scientists to develop oil-eating bacteria.
- B. More health-care providers for the elderly are hired.
- C. Fewer production jobs open up due to use of industrial robots.
- D. More law enforcement personnel are hired for citizen protection.

25. What is meant by "staffing patterns"?

- A. the skills needed to perform a job
- B. trends in employment opportunities
- C. determining work schedules for personnel
- D. configuration of computer equipment



**STOP HERE  
DO NOT TURN THE PAGE**



**MATH TEST**



### DIRECTIONS

1. Please do not write in the test booklet. Mark your answers only on the answer sheet. Use scratch paper to do your work if needed.
  2. Use number 2 pencil only. Do not use ink. If you want to change an answer, be sure to erase the first mark completely.
  3. Read and follow all directions carefully. Try to answer each question. Choose the one best answer.
  4. You may not use a calculator.
- 

### PRACTICE

#### Example 1

$$\begin{array}{r} 7649 \\ + 5183 \\ \hline \end{array}$$

- A. 12,722
- B. 12,832
- C. 13,822
- D. 13,931

#### Example 2

You want to buy two shirts at a price of \$8.50 each. What is the total price?

- A. \$8.50
- B. \$16.00
- C. \$16.50
- D. \$17.00

#### PRACTICE

A	<input checked="" type="radio"/>	C	D
A	B	C	<input checked="" type="radio"/>

Blank  
(Scratch Paper)

26.  $6.53 + 2.4 =$

- A. 8.93
- B. 6.77
- C. .893
- D. .677

27.  $53 \times .07 =$

- A. .371
- B. 3.71
- C. 37.1
- D. 371

28. 
$$\begin{array}{r} \frac{1}{7} \\ + \frac{4}{7} \\ \hline \end{array}$$

- A.  $\frac{5}{49}$
- B.  $\frac{5}{14}$
- C.  $\frac{5}{7}$
- D.  $\frac{8}{11}$

29.  $\frac{1}{2} \times \frac{2}{5} =$

- A.  $\frac{1}{5}$
- B.  $\frac{3}{10}$
- C.  $\frac{3}{7}$
- D.  $\frac{4}{5}$

30. 
$$\begin{array}{r} \frac{3}{4} \\ - \frac{1}{3} \\ \hline \end{array}$$

- A.  $\frac{5}{12}$
- B.  $\frac{4}{7}$
- C.  $1\frac{1}{12}$
- D. 2

31.  $2\frac{2}{3} \div 1\frac{1}{3} =$

- A.  $\frac{2}{9}$
- B.  $\frac{1}{2}$
- C. 2
- D.  $3\frac{5}{9}$

Refer to the pay stub to answer questions 32, 33 and 34.

TECH CORP. OF AMERICA		
EMPLOYEE Jones, Bob	SOC. SEC. NO. 782-52-0270	
PAY RATE/HR. \$5.50	HOURS WORKED 40	WEEK ENDING 7/15/94
GROSS SALARY \$220.00	NET SALARY	
FEDERAL TAX \$42.00	STATE TAX \$7.00	
FICA \$15.00	DUES \$4.00	

32. How much is Bob's net salary for the week?

- A. \$152.00
- B. \$158.00
- C. \$162.00
- D. \$288.00

33. The next week Bob worked 36 hours at the pay rate shown on the stub. What was his gross salary for the 36-hour week?

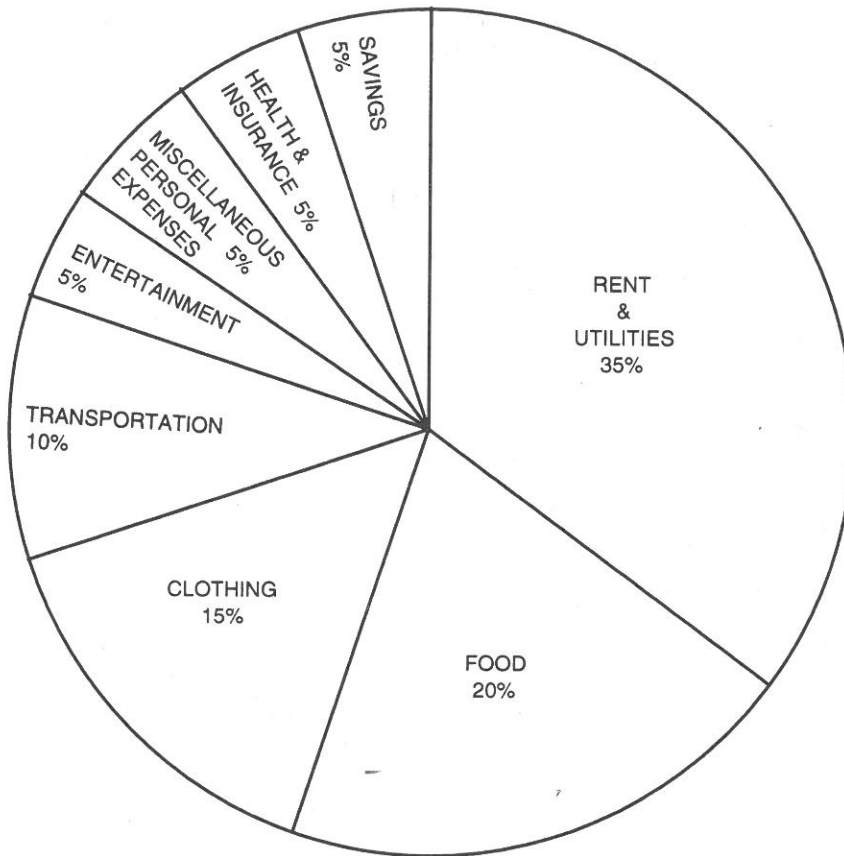
- A. \$91.00
- B. \$198.00
- C. \$208.00
- D. \$220.00

34. Bob's pay rate has changed to \$6.65 per hour. What is his new gross salary for 40 hours of work?

- A. \$46.65
- B. \$220.00
- C. \$244.00
- D. \$266.00

Read the information and refer to the graph to answer questions 35, 36 and 37.

Eva Benson has prepared a monthly budget. Her monthly earnings are \$950.00. She made a graph of her monthly expenses.



35. How much money does Eva Benson spend each month for her rent and utilities?

- A. \$271.42
- B. \$332.50
- C. \$617.50
- D. \$740.00

36. How much more does Eva Benson spend on food than on transportation each month?

- A. \$10.00
- B. \$20.00
- C. \$95.00
- D. \$190.00

37. Eva wants to buy a new television set that costs \$380. For how many months must she save money from her entertainment budget in order to buy the television?

- A. 5
- B. 6
- C. 7
- D. 8

Refer to the time card to answer questions 38, 39 and 40.

No. 150		PAY PERIOD ENDING 6/30--	
Name <u>Mike Carson</u>			
DAYS	RT	HOURS	OT
1	8	1st DAY	IN 8:00
			OUT 12:00
			IN 12:30
2	8	2nd DAY	IN 4:30
			OUT 8:00
			IN 12:30
3	8	2nd DAY	IN 1:00
			OUT 4:30
			IN 8:00
4	8	3rd DAY	IN 12:00
			OUT 12:30
			IN 4:30
5	8	4th DAY	IN 8:00
			OUT 12:00
			IN 12:30
6	8	5th DAY	IN 4:30
			OUT 8:00
			IN 12:00
7	8	6th DAY	IN 12:30
			OUT 4:30
			IN
TOTAL	40	7th DAY	IN
			OUT
			IN
RATE		9   60	
AMOUNT		384.00	
TOTAL EARNINGS		384.00	
TOTAL DEDUCTIONS		89.33	
BALANCE DUE		294.67	
NO. OF EXEMPTIONS		4	
F.I.C.A.		27.00	
FED. W.T.		47.28	
INSURANCE		4.51	
CITY/ST. W.T.		10.54	
ST. UN. COMP.		0	
ST. DIS. BEN.		0	
DUES		0	
BONDS			
PAYMENT RECEIVED IN			
SIGNED		<i>Mike Carson</i>	

38. How much does Mike Carson earn every day?

- A. \$89.33
- B. \$76.80
- C. \$27.00
- D. \$9.60

39. Mike Carson takes home approximately what percent of his gross pay?

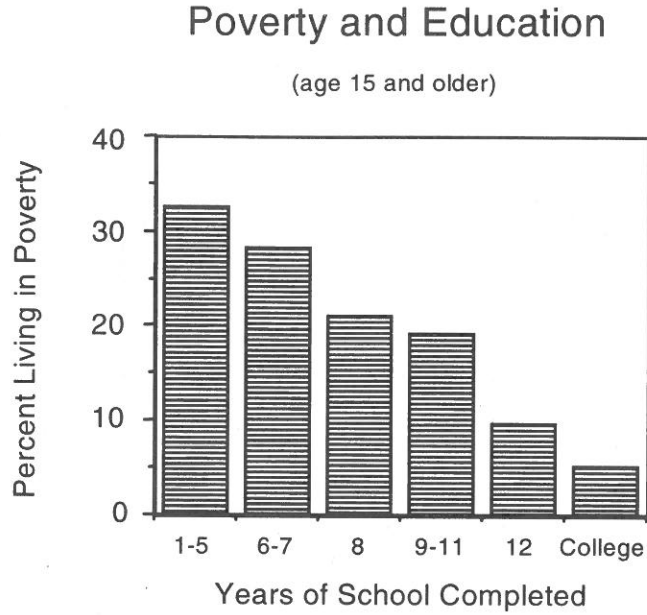
- A. 33%
- B. 50%
- C. 75%
- D. 90%

40. Approximately what percent of total earnings is deducted for city and state withholding tax?

- A. 3%
- B. 10%
- C. 15%
- D. 25%

Refer to the graph to answer questions 41, 42 and 43.

33.1 million in U.S. (14% of the population) live below the poverty line



41. Which of the following pairs of groups shows the greatest percent difference?

- A. 12 and College
- B. 9-11 and 12
- C. 8 and 9-11
- D. 6-7 and 8

42. If 33.1 million people are 14% of the population, what is the total population?

- A. 4.6 million
- B. 42.3 million
- C. 236.4 million
- D. 463.4 million

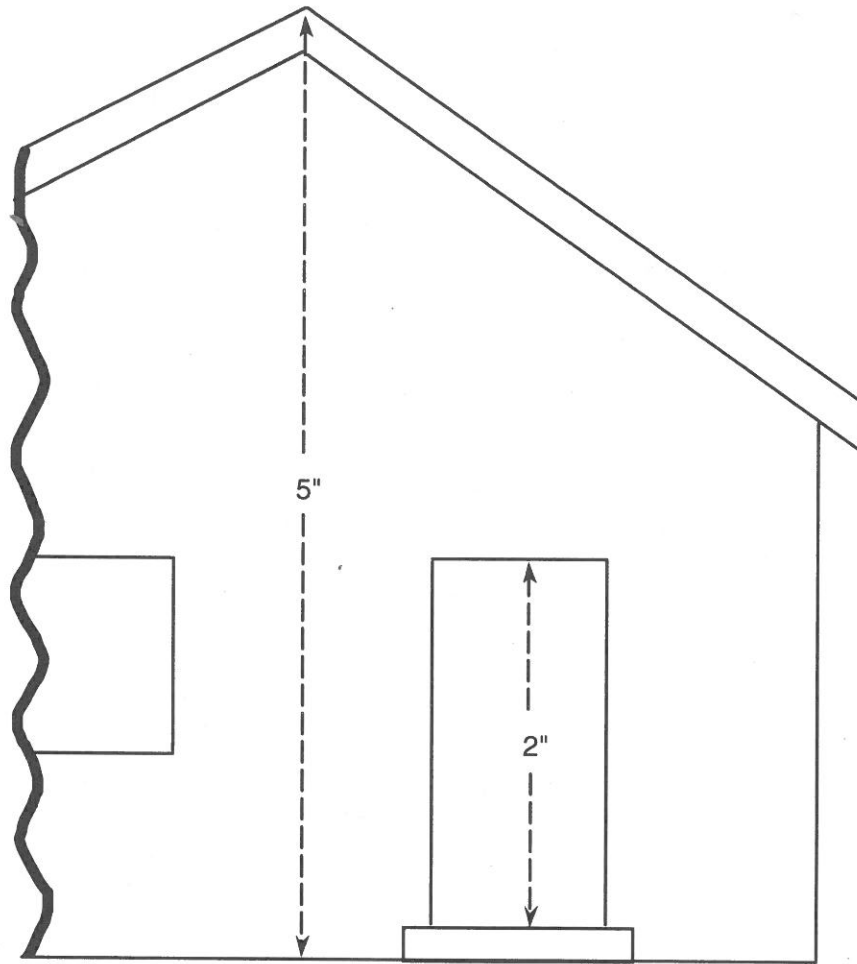
43. What percent of the population is at or above the poverty level?

- A. 86%
- B. 66.9%
- C. 33.1%
- D. 14%



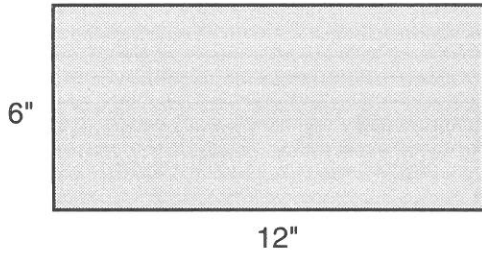


Refer to the drawing to answer question 46.



46. Shown above is a scale drawing of a house. On the drawing, the door is 2 inches high and the roof is 5 inches high. On the real house, the door is 7 feet high. How high is the roof of the house?
- A. 10 feet
  - B. 12.5 feet
  - C. 14 feet
  - D. 17.5 feet

Refer to the diagram to answer question 47.



47. What is the perimeter of this rectangle?

- A. 18 inches
- B. 30 inches
- C. 36 inches
- D. 72 inches

48. The High Fashion Jewelry Shop had 40 customers on Monday, 35 customers on Tuesday, 40 customers on Wednesday, 50 customers on Thursday, 75 customers on Friday, 81 customers on Saturday, and 78 customers on Sunday. What was the average daily number of customers for the week?

- A. 40
- B. 57
- C. 75
- D. 81

Refer to the information to answer question 49.

Many workplaces record work time in decimal form. For example:

$$1\frac{1}{2} \text{ hours} = 1.5 \text{ hrs.}$$

49. Convert the decimal time of 2.65 hours to hours and minutes.

- A. 2 hours and 39 minutes
- B. 3 hours and 5 minutes
- C. 2 hours and 35 minutes
- D. 2 hours and 45 minutes

50. To dress for her new job, Karen bought two jackets, two blouses, and two skirts. If she wears a jacket-blouse-skirt combination each day, how many different combinations can Karen wear using her new items of clothing?

- A. 3
- B. 5
- C. 6
- D. 8

**END OF TEST**

**EXHIBIT Y-1**



The nation's largest pro bono law firm

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October 27, 2023

**Via Email Only**

Scott Marcus  
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200 North Main Street  
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Los Angeles, CA 90012  
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**Re:** *Rodriguez v. L.A.*, Case No. CV11-01135 DMG (JEMx): Request to Meet and Confer about Plaintiffs' Planned Motion to Enforce the Settlement Agreement

Dear Mr. Marcus:

Out of an abundance of caution, Plaintiffs request the parties meet and confer in anticipation of our filing a Motion to Enforce the parties' settlement agreement with respect to Defendant's: (1) breach of the prohibition of administrative expenses exceeding ten percent of total annual expenditures<sup>1</sup>; and (2) policies and practices deterring class member participation in settlement benefit programs.<sup>2</sup>

As you know, Local Rule 7-3 requires the conference of counsel prior to the filing of motions. We satisfied this requirement by meeting with you on June 9, 2023, to discuss Defendants' excessive administrative costs. In addition, we have had extensive email communications with EWDD about this issue since we met on June 9. Defendants have failed to produce financial records that show it is in compliance and, therefore, we believe the parties are unable to reach a resolution that eliminates the necessity for a hearing. Please let us know if you disagree so that we can meet about this issue again.

With respect to the second issue raised in our planned motion, Class Counsel have regularly and diligently flagged for Defendant every instance of deterrence of participation of which we have learned. Nonetheless, widespread problems persist. We are requesting a meeting to discuss these issues as a whole in order to satisfy Rule 7-3.

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<sup>1</sup> Exhibit B to Settlement Agreement, Sec. II.

<sup>2</sup> Settlement Agreement ¶58.

**Background on Administrative Costs Discussions**

The Settlement provides that “[a]dministrative costs for the Jobs and Education Program are included in the total minimum [\$1.125 million per year] and maximum [\$7.5 million per year] contributions; however, they will not exceed 10% of the total annual expenditures.” Exhibit B to Settlement Agreement, Sec. II. “Administrative Costs” are defined as “the estimated cost for administering the settlement and claims process, including providing the Notice of Settlement, various efforts to locate Settlement Class Members, and coordinating the provision of settlement benefits to the Settlement Class.” Settlement at ¶16.

On May 16, 2023, Class Counsel emailed you requesting that the parties meet and confer regarding accounting discrepancies in various settlement-related reports that lead us to believe the city is exceeding the ten percent limit on administrative expenses. As noted in that request, Plaintiffs had previously raised concerns about this issue on February 6, 2023, and March 29, 2023.

The parties met on June 9, 2023, and discussed:

- 1) The discrepancies in various reports related to WorkSource center spending (variously \$6.5M, \$8M and \$10M), and how the expenses were broken down into spending attributable to individual class members versus other expenses;
- 2) The city’s spending on Administrative Costs, including the components of the \$3.29M for “EWDD Oversight” referenced in EWDD’s January 9, 2023 transmittal to the City Council entitled “Approval of Request From To Allocate \$2.75 Million to the [Rodriguez] Settlement Program;” and
- 3) Overcoming barriers to participation: outreach, testing, improving communications with class members.

During our meeting, the city agreed to provide Plaintiffs with:

- 1) A complete and up-to-date report of settlement expenses that:
  - a. Is broken down by year;
  - b. Identifies the WorkSource Center or other service provider;
  - c. Details expenses by class member (we discussed that some WorkSource centers have been billing for categories – like “case management” – that are not broken down by class member. Defendant agreed to investigate and explain this);
  - d. Makes clear what expenses EWDD considers Administrative Costs (as defined in the Settlement Agreement) including, without limitation, payments to CAC, HELPER, and for radio and TV advertisements, etc.; and
  - e. Includes sufficient detail to reconcile the other program related reports we discussed.
- 2) A list of the seven community based outreach partners you stated have been helping the WorkSource centers and providers better serve the class member population; along with information about which EWDD contractor(s) each organization works with.
- 3) EWDD’s policies for considering any benefits beyond jobs and education programs that have been provided to any class member (e.g., housing assistance, bail, etc.)

I confirmed our agreement by email on June 12. On July 14, 2023, Class Counsel received from the city seventeen documents described by Juan Romero, LARCA Program Sr. Project Coordinator as:

- “LARCA Agencies Financial Expenditure Reports Folder - Agency Case Management Services and Participant Support Services Totals YTD (We're still collecting and consolidating May & June 2023 agency invoices)”
- “EWDD LARCA Cost for Admin & Program YTD”
- “Updated LARCA Agency Settlement Expenses by Program Year”
- “Policy Support Service /Needs Related”

We followed up by email several times to obtain clarification on the documents the city provided (which included internally contradictory and inconsistent information)<sup>3</sup> and other information provided to us, as well as to request missing information. In response to one of our emails, the city provided us, on September 1, an “updated EWDD expenditure report” that reflected purportedly “corrected” values which were inconsistent with other records, including those provided to us in the city’s June 14 response, referenced above. We requested information several times to help us understand and reconcile the various records. Most recently, I emailed on September 19 requesting the city provide the outstanding information by September 25. As of the date of this letter, we have not received any response to that email. (See Exhibit B).

Based on Class Counsel’s analysis of the documents provided, the city has exceeding the ten percent cap regardless of the various possible means of calculation. In addition, the city’s inability to produce consistent and understandable information lays bare that it cannot establish compliance with the Administrative Cost provision.

**EWDD’s “Administrative & Program Operations Cost” document**

One of the documents the city sent us presents the “year-end expenditures” for each program year, broken down by “administrative” and “program operations” (the “A&P Report”). (Attached as Exhibit C).

Based on our June 9 meeting, Class Counsel and the City have quite different understandings of what is an Administrative Cost under the settlement. For this reason, we had requested that the city provide us data so as to “[m]ake[] clear what expenses EWDD considers Administrative Costs (as defined in the Settlement Agreement)....”

Despite our requests, it remains unclear from the city’s documents how EWDD defines or distinguishes administrative expenditures and other program expenses. When we followed up about this on August 15, 2023, Juan Romero provided us a “Program Administration” narrative (attached as Exhibit D).

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<sup>3</sup> For example, the financial report for the period ending 06/30/23 (Attached as Exhibit A) shows \$2,065,494 in total obligations for fiscal year 2016-2017 in the summary table, but the detailed table shows a total of \$1,840,615 spent in that period.

As we have previously communicated, everything described in the Program Administration document falls under the category of “coordinating the provision of settlement benefits to the Settlement Class” and is therefore an “Administrative Cost” under the settlement agreement. In other words, EWDD’s “program operations” costs are, in fact, “administrative costs” under the settlement agreement.

We followed up with EWDD again on August 17, 2023, and requested “additional details so that we can see the breakdown of everything EWDD is counting as ‘Program Operations’ and ‘Administrative’ to obtain the totals in the... [A&P Report]” (See Exhibit E). EWDD’s response (attached as Exhibit F) declined to provide the information we requested and pointed us to the publically available “Budget Schedule included in the Annual Plan,” which is unresponsive because those public documents do not differentiate between “Program Operations” and “Administrative” costs as the documents provided to us by EWDD do.

The following table shows the percentage of true “administrative” costs (what EWDD lists as “admin” plus “program operations”) based on the program expenses reflected in the April 14, 2023, Report from the CAO. (Ex. L)<sup>4</sup>.

<b><u>EWDD LARCA Costs for Admin. and Program (A&amp;P Report)</u></b>			<b><u>April 14, 2023, Report from CAO</u></b>	
<b>Program Year</b>	<b>Admin</b>	<b>Program Operations</b>	<b>Program Expense</b>	<b>% Admin&amp;Program</b>
1 - 2016-2017	\$151,725.00	\$75,121.00	\$1,592,536.00	14.24%
2 - 2017-2018	\$279,854.46	\$510,079.39	\$1,981,475.00	39.87%
3 - 2018-2019	\$260,420.75	\$510,674.00	\$1,799,329.00	42.85%
4 - 2019-2020	\$301,687.69	\$630,214.01	\$1,200,211.00	77.64%
5- 2020-2021	\$211,477.39	\$371,819.83	\$3,639,445.00	16.03%
[The table did not include a row for fiscal year 2021-2022]				
6 - 2022-2023	“Not available”	“Not available”		
<b>Total</b>	<b>\$1,205,165.29</b>	<b>\$2,097,908.23</b>	<b>\$10,212,996.00</b>	<b>32.34%</b>

Moreover, the true total administrative costs is likely even higher when considering that the Program Administration document does not account for administrative expenses within the WorkSource centers (i.e., it only considers EWDD’s administrative expenses). Nor do any of the documents Defendant has provided Class Counsel show the payments to the claims

<sup>4</sup> See April 14, 2023 Report from the CAO, available at: [https://clkrep.lacity.org/online/docs/2016/16-0081-S3\\_rpt\\_cao\\_04-14-2023.pdf](https://clkrep.lacity.org/online/docs/2016/16-0081-S3_rpt_cao_04-14-2023.pdf)

administrator, CAC Services Group, LLC, which are also administrative costs. Included in the documents the city provided us on July 14, 2023, were thirteen Excel workbooks reflecting the expenses of individual providers/WorkSource centers. In addition to enumerating expenses paid directly for the benefit of class members (e.g., employment readiness workshops, vocational training, education stipends, etc.) each of these workbooks reflect administrative costs (i.e., for outreach, reporting, meetings, etc.) that we do not believe are accounted for in the A&P Report. Thus, the true administrative costs are even higher than those reflected in the above table.

Even if – for the sake of argument – the city’s definition of what is an administrative expense was correct and complete and we do not add “program expenses” to the administrative costs, the city is exceeding the permissible ten percent, as illustrated in the following table:

<b><u>EWDD LARCA Costs for Admin. and Program (A&amp;P Report)</u></b>		<b><u>April 14, 2023, Report from CAO</u></b>	
<b>Program Year</b>	<b>Administrative</b>	<b>Program Expense</b>	<b>% Admin</b>
1 - 2016-2017	\$151,725.00	\$1,592,536.00	9.53%
2 - 2017-2018	\$279,854.46	\$1,981,475.00	14.12%
3 - 2018-2019	\$260,420.75	\$1,799,329.00	14.47%
4 - 2019-2020	\$301,687.69	\$1,200,211.00	25.14%
5- 2020-2021	\$211,477.39	\$3,639,445.00	5.81%
[The table did not include a row for fiscal year 2021-2022]			
6 - 2022-2023			
<b>Total</b>	<b>\$1,205,165.29</b>	<b>\$10,212,996.00</b>	<b>11.80%</b>

Thus, even under the analysis most favorable to the city, it has expended more than the ten percent on administrative costs permitted under the settlement agreement for three of the five years for which the city provided information, and as a combined total.

In light of the foregoing, we believe we can establish Defendant’s violation of the settlement agreement.

**The city has not provided Plaintiffs all the information it agreed to send**

Class Counsel have made significant efforts to gather the information necessary to conduct the analysis above. Notwithstanding our clear and detailed requests for the information we need, Defendant’s agreement at our June 9 meeting, and numerous follow-up requests, there are still significant gaps and inconsistencies.



For this reason, we anticipate requesting that the Court appoint a Special Master and Independent Forensic Examiner to oversee settlement compliance. The record of the city's failure to provide timely and non-conflicting data to Class Counsel will be persuasive to the court and support the appointment of these experts.<sup>5</sup>

First, data for 2021-2022 and 2022-2023 in the A&P Report was missing. We eventually received 2022-2023 data on September 1, but that report (attached as Exhibit G) was inconsistent with the information previously provided in the A&P Report (Ex. C).<sup>6</sup>

Second, the parties agreed that the city would “[m]ake[] clear what expenses EWDD considers Administrative Costs (as defined in the Settlement Agreement) including, without limitation, payments to CAC, HELPER, and for radio and TV advertisements, etc.” The A&P Report provides no such information. Another document, “the Financial Report” (attached as Exhibit A), includes various details that Class Counsel view as Administrative Costs (i.e., “EWDD Oversight,” “Outreach and Marketing”). It is not clear if those are the categories of expenses classified as administrative in the A&P Report.

We followed up on this issue and received the “Program Administration” narrative (Ex. D) on August 15, 2023. Nonetheless, the information in the narrative was inadequate to understand the city's calculations and we again requested additional details on August 17 and August 24, 2023. EWDD provided some additional information on September 1 (attached as Exhibit F), but rather than provide clarity, the response indicates EWDD is unable to break down expense costs in a manner that would allow a precise calculation of its administrative costs.

Third, the city agreed to provide us information sufficient to “reconcile the other program related reports we discussed.” Nonetheless, we are currently unable to reconcile the information in the thirteen provider-specific Excel workbooks with the figures in the Financial Report (Ex. A) because the totals reflected in the Excel documents do not match the values for the corresponding provider in the Financial Report.

Moreover, the Financial Report reflects \$15.7 million budgeted towards the settlement and \$11.7 million expended. We are unable to reconcile these figures with those reflected in the other reports we discussed on June 9:

- April 20, 2022 LARCA Report details a total amount spent of \$5,426,067.25. (See Exhibit H).

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<sup>5</sup> In addition, the information provided to us by EWDD reflects some alarming practices that warrant forensic investigation. For example, the invoice report for Goodwill Pacoima North Valley WorkSource Center dated 6/1/2023, includes \$14,400.00 in services to a “John Doe.”

<sup>6</sup> The city noted that the report we received on September 1 “includes corrections to previously reported expenditures, including removing Central Service expenditures, which were incorrectly included in our previous report. Central Services are not charged to City General Fund programs.” (Ex. F). Nevertheless, this does not address the fact that the information provided was irreconcilable and the city has not responded to our September 7, 2023, request to “send us one document with all the complete and correct information, including everything in the attached 06/30/23 financial report.” (See Ex. B).

- January 9, 2023 EWDD Report (Exhibit I)<sup>7</sup>:
  - \$13,301,863 appropriated
  - \$10,010,794 allocated to service providers
  - \$3,291,069 was for “EWDD Oversight”
  - \$7,955,559 spent
  - \$2,055,235 remaining balance committed to be spent through June 2023
- February 14, 2023 LARCA Report (Exhibit J) details a total amount spent of \$6,475,987.84.<sup>8</sup>
- Both the March 9, 2023 CAO report (Exhibit K)<sup>9</sup> and the April 14, 2023 (Exhibit L)<sup>10</sup> CAO documents reported \$13,181,689 allocated towards the Settlement and projected spending on the settlement (through February 2023) at \$12,069,506.

We invite the city again to provide us the outstanding information ahead of the meeting requested in this letter, but we have already given it ample time to do so and are unwilling to delay further.

### **Deterrence of Participation**

Since the inception of the settlement benefits program, Defendant’s – and its contractors’ – policies and practices have deterred class member participation. The settlement agreement requires the parties to “cooperate fully with each other to... implement the terms [of the settlement agreement and] to use their best efforts, including all efforts contemplated by [the] Settlement Agreement, and any other efforts that may become necessary... to effectuate th[e] Settlement Agreement.” Settlement Agreement ¶58. In contrast, Defendant’s implementation and administration of the settlement benefits program has fallen short of “fully cooperative” and has not been indicative of a genuine attempt to make good on the commitments in the settlement agreement.

Deterrent practices are systematic and longstanding.<sup>11</sup> We do not attempt to address every single deterrent practice in this letter but provide examples sufficient to establish Defendant’s breach.

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<sup>7</sup> This document is also publically available at:

[https://clkrep.lacity.org/onlinedocs/2016/16-0081-s3\\_rpt\\_EWDD\\_01-09-23.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0081-s3_rpt_EWDD_01-09-23.pdf)

<sup>8</sup> This figure was calculated by Class Counsel from the LARCA Report by adding the following: \$120,225.72 expended on “Outreach, Enrollment, Evaluation & Assessment” and not attributed to a class member; \$159,900.00 on “Case Management Sessions & Support Activity” not attributed to any class member; and \$84,300 towards “Career Services & Employment Readiness Workshops” not attributed to any class member.

<sup>9</sup> This document is also publically available at:

[https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3\\_misc\\_3-9-23.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_misc_3-9-23.pdf)

<sup>10</sup> April 14, 2023 Report from the CAO, available at:

[https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3\\_rpt\\_cao\\_04-14-2023.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_rpt_cao_04-14-2023.pdf)

<sup>11</sup> Even going back to when the parties were negotiating the settlement agreement, Class Counsel warned, unsuccessfully, about the use of WorkSource centers to administer benefits to the class because of historical discrimination against perceived gang members by the WorkSource centers.

1. Testing

In the first years of the implementation of the settlement agreement, the city required class members to take literacy and arithmetic tests. Although testing was mostly discontinued after Class Counsel complained about it, including at our meeting with you and the City on 19 December 2019, we continued to hear from some class members about testing requirements long after the city told us the practice had ended. Class Counsel repeatedly raised this problem with Defendant, including, but not limited to in our: February 23, 2021 letter “Re: Meet and confer related to a further extension of the claims process and training programs; further follow up on the Monitor’s reports” (Exhibit M, page 2); August 16, 2021, email Re: “Rodriguez case meeting notes” (Exhibit N); October 5, 2021 letter “Re: Meet and confer related to a further extension of the claims process and training programs” (Exhibit O); December 9, 2021 email “RE: Rodriguez v. City of Los Angeles” (Exhibit P); and August 15, 2022 email Re: “Rodriguez: Matters for Rule 7-3 Meet & Confer” (Exhibit Q).

This Jim Crow-era style of testing has had a lasting chilling effect on class member participation.

2. Unresponsive Providers and Caseworkers; Severe Delays In Class Members Accessing Services and Being Reimbursed

Class Counsel have had to assist numerous class members in order to overcome unresponsive WorkSource centers and other providers or their caseworkers and obtain the benefits to which they are entitled.

These issues are well documented. For example, on November 12, 2021, we wrote EWDD about a class member who had been awaiting reimbursement through the Watts Los Angeles WorkSource Center for several weeks. We followed up with EWDD several times over several weeks noting the “especially egregious delay.” (See Exhibit R). As Class Counsel have raised with Defendant several times – and the Defendant has acknowledged – class members generally do not have the means to advance the cost amounts needed to obtain the benefits to which they are entitled. For example, we wrote the city about this on October 5, 2021, describing the issue as follows:

“[M]any class members have been told to pay for training or supplies out-of-pocket to be reimbursed at a later time. Many, if not most, class members are not in a financial situation to make these payments. Others have managed to make the upfront payments but have experienced financial hardship due to long delays in receiving reimbursements. The economic fallout of the ongoing pandemic has made it even more difficult for class members to afford out-of-pocket expenses and to make ends meet while awaiting reimbursement. We understand one of the most successful forms of outreach to class members is hearing about the program from current participants. However, if participants have to pay for benefits out-of-pocket and wait many weeks for reimbursement, they are unlikely to recommend the program to others. These problems with the delivery of services disincentivize class members from enrolling in the program.”

A copy of this letter is attached as Exhibit SS. Similarly, on January 26, 2022, we again protested this practice on the grounds that the parties “cannot expect class members to shoulder these costs in the meantime – they do not have the resources to do so.” See Exhibit TT.

We complained of similar delays on August 17, 2021 (See Exhibit S). We also wrote EWDD on February 10, 2022, about unacceptably long delays faced by a class member seeking reimbursement through the MCS/Hollywood WorkSource Center. We resorted to providing EWDD a timeline of events to illustrate the problem, and prompt troubleshooting to avoid similar delays for other class members. (See Exhibit T).

In another case, on April 15, 2022 we emailed EWDD about two class members that had been awaiting reimbursement for educational expenses for, in one case, nine months. (See Exhibit U). On July 22, 2022, we emailed about “[f]urther delays in service provision and reimbursements to class members.” (See Exhibit V). We also wrote you and EWDD on August 15, 2022, about several class members experiencing delays in accessing services and reimbursements. (See Exhibit Q). On March 8, 2023, we wrote following up on a January 24, 2023 email about WorkSource issues and requested “a wholesale review of the work El Proyecto del Barrio has been doing and to make sure that all class members... get a direct line to someone... who can sort out their issues promptly.” A copy of that email chain is attached as Exhibit W.

We also contacted EWDD about an unresponsive caseworker on May 3, 2023. A copy of that email chain is attached as Exhibit X. And on May 12, 2023, we wrote about an individual assigned benefits by a class member relative improperly denied benefits by the Boyle Heights/East Los Angeles WorkSource Center. EWDD was unable to confirm the individual’s eligibility and Class Counsel had to work with the claims administrator to obtain confirmation. Class Counsel advocated for the individual, exchanged numerous emails with EWDD, and ultimately – despite our objection – the individual had to obtain a new assignment of benefits form to correct an EWDD error in order to be approved for benefits a month later on June 12, 2023. The email exchange is attached as Exhibit Y. To date – more than four months later – that individual has still not had her educational expenses paid.

These examples are by no means exhaustive of the issues we have tried to address with Defendant. Moreover, not every class member with problems contacts Class Counsel, so it is reasonable to infer that for every class member that contacts us for assistance, there are several others who simply gave up on obtaining the benefits to which they are entitled.

### 3. Opaque and Arbitrary Benefits Decisions

Throughout the settlement benefits program, it has been unclear to class members – and Class Counsel – exactly what benefits are available and how EWDD makes decisions about providing benefits. For example, some class members received rental/housing assistance and others were told that benefit was not available. Class Counsel sought clarification on this issue on May 8, 2023, and EWDD responded on May 12, 2023, that “housing and rental [assistance] was available only during the pandemic... [and] ceased last June 2022.” Exhibit Z.

Notwithstanding Defendant's claim that housing and rental assistance was terminated in June 2022, EWDD continued to circulate flyers – as late as April 2023 – indicating housing and rental assistance was available. As a result, many class members were confused by being told that was not an available benefit. For example, on May 1, 2023, we wrote EWDD about an unhoused class member who saw a flyer indicating housing benefits are available but was denied that benefit. A copy of that email is attached as Exhibit AA.

We discussed with Defendant the inconsistent provision of so-called “supportive services” during our June 9, 2023, Meet and Confer, and requested EWDD's policies for considering any benefits beyond jobs and education programs that have been provided to any class member (e.g., housing assistance, bail, etc.) (See Exhibit BB).

In response, Defendant provided us a “Supportive Services/Needs-Related Payments Policy” with an effective date of July 1, 2023, after the date on which we requested the policy. A copy of the policy is attached as Exhibit CC. Thus, it seems EWDD apparently did not have a policy before we requested it. Moreover, as we explained to EWDD on July 21, 2023, the policy appears to be inapplicable to class members because it says it is about “WIOA activities.” We also explained that, in any event, the policy is inappropriate as applied to class members because it limits supportive services to “customers who cannot obtain supportive services through other programs or partner agencies providing such services.” A copy of our correspondence is attached as Exhibit DD. EWDD's response, dated August 4, 2023, attached as Exhibit EE, did not address the issue.

EWDD has previously argued that it makes individualized decisions about whether to approve “supportive services.” Nonetheless, as we have repeatedly stated, there should be equally applied considerations and factors to guide those decisions (i.e., a policy) so there is equity, consistency, and transparency in benefits decisions.

By not providing clear and current information about all the benefits available and how to obtain each benefit, Defendant is deterring Class Member participation. Relatedly, the unannounced termination of benefits (e.g., housing and rental assistance) has had a deterrent effect on frustrated Class Members.

Relatedly, Defendant has frequently failed to provide Class Counsel with important updates about settlement program policy changes, as well as settlement program expenses. For example on July 21, 2023, we wrote about EWDD's “dual enrollment policy,” and how Class Counsel was “frustrated to again find ourselves not having been timely provided with information... that has ramifications for the administration of the settlement.” (See Exhibit DD, page 2). With respect to settlement financial information, Class Counsel first discovered the problems with Defendant's administrative expenses from publically filed documents, not from information provided by Defendant.

#### 4. Benefits Cap

The city has inconsistently capped some class member's benefits at the \$10,000 average benefit estimate discussed in the settlement agreement, while allowing other class members benefits

between two and six times that average. EWDD has attempted to justify a strict cap by citing a recent increase in claims, but the claims administrator's reports show no such increase.

Class Counsel wrote EWDD about this on September 18, 2023, advocating for one class member, a young woman who had been denied educational benefits because of the cap; we cited examples of other class members who had received well above \$10,000 in benefits and showed the claims administrator's data did not show a significant increase in claims (attached as Exhibit FF).

EWDD eventually relented and agreed to provide that class member with additional benefits over the \$10,000 estimated average. Nevertheless, Class Counsel's months long intervention to obtain this result illustrates the deterrent effect of the cap.

We continue to monitor the submission, processing, and approval or denial of claims based on the claims administrator's monthly reports and see no significant increase that might justify capping benefits. A copy of our analysis through October 2023 is attached as Exhibit GG.

Defendant's arbitrary capping of benefits for some class members who are clearly eligible and seeking benefits plainly within the scope of the settlement benefits program, when low program participation permits approving those benefits, deters participation

#### 5. Dual Enrollment Policy

In July 2023, Class Counsel learned of EWDD's policy prohibiting co-enrollment in the settlement benefits program (LARCA 2.0) and "the City's WIOA programs [or] other special grant-funded programs without the express written pre-authorization of the City." (WDS Directive No. 23-01 (Sept. 19, 2022) at p. 2, attached as Exhibit HH).

Class Counsel wrote EWDD about the problems with the policy: namely that the settlement contains entitlements that should not impact enrollment in other city programs which are not entitlements – it is entirely separate and should be treated as such. Nonetheless, the city has refused to change the policy. A copy of our correspondence is attached as Exhibit DD. The city's position, articulated in EWDD's August 4, 2023, response (Exhibit EE) is that it is not denying dual enrollment because its policy provides for dual enrollment with the "express written pre-authorization of the City." Nonetheless, forcing class members to take additional steps to obtain written pre-authorization deters them from program participation.

#### 6. WorkSource Center Funding

Class members seeking benefits have been turned away from WorkSource centers because, they are incorrectly told, the settlement program is out of money. Other class members were denied benefits – including reimbursement for out-of-pocket expenses they fronted – because, they were incorrectly told, the program was out of money. This has been a perennial problem.

For example, we wrote EWDD on August 13, 2021, after Archdiocesan Youth Employment Services told a class member her previously approved educational benefit would not be paid "because of the hold in funds." (See Exhibit II). On November 21, 2021 the city stated "Service

providers who are nearing their total allocation have been asked to prioritize participant subsidized employment opportunities, training, and educational and employment service requests while additional allocations are being sought.” (See Exhibit JJ). When we were still hearing from class members that there were no funds available in January 2022 we again wrote to the city as we had been told the allocations issues should have been sorted out in December: on January 11, 2022 Gerardo Ruvalcaba wrote: “The contract updates were approved by City Council last month and all amendments have now been executed. Ricardo has also been in contact with service providers to ensure that there are no further delays in services.” (See Exhibit KK).

On August 24, 2022, we again flagged concerns about class members being turned away from EWDD’s providers and requested your “assurances that... WorkSource Centers will not run out of money such that they turn class members away or delay their service; and [that] [r]eimbursements will be swiftly approved upon presentation of receipts and paid within 10 business days[.]” You responded nearly a month later, on September 22, 2022, as follows:

“Unfortunately, we cannot give you either of the assurances you request because there are a multitude of factors that contribute to each of these problems, several of which are beyond the control of EWDD and the City. We can assure you that EWDD and the City will continue to use its best efforts to ensure that no class member is turned away or delayed in receiving appropriate services due to funding, and that reimbursements will be processed as swiftly as possible.”

A copy of this email exchange is attached as Exhibit LL; the quoted language is highlighted on page 5 of the emails.

When we met with the city on January 23, 2023, we discussed this issue again and, as we memorialized in an email sent later that day, “Gerardo [Ruvalcaba, EWDD’s Assistant General Manager for the Workforce Development System] confirmed that the City will not allow the WSC to become unfunded for this work; as such, class members should not be told that there is no more funding during the pendency of the settlement.” (See Exhibit MM).

More recently, we wrote EWDD about the problem in May 2023 and were again assured that “agencies that have exhausted their funding [would] refer all and any new class members wishing to enroll with them to [EWDD].” (See Exhibit Y). Yet we know at least one other class member was turned away as recently as October 2023, when we again raised the concern. (See Exhibit NN).

Defendant’s position is that EWDD “is not aware of any class members being turned away” even though Class Counsel have made them aware of the problem. (Ex. NN). In addition, Class Counsel recently learned that EWDD has had this problem flagged for them by the office of a City Councilmember, including in meetings last month and earlier this month.

It should go without saying that Defendant is deterring program participation by telling class members – though their contractors – that the program is closed or out of money. Moreover,

Defendant's refusal to acknowledge there is a problem calls into question whether it has taken any corrective action.

#### 7. Program Participation Rates

The disparity between the class size and the number of class members who have actually received a tangible benefits is a compelling illustration of Defendant's deterrence of program participation. According to the 2018 "LARCA 2.0 Evaluation, Flash Report," Exhibit OO, page 3, "an estimated 5,600 class members are covered by the Rodriguez Settlement." The Office of the City Administrator has used a higher estimate of 6,000. (Ex. L) <sup>12</sup>. As of October 6, 2023, the claims administrator has received only 1,830 claims and approved 1,704. (See Exhibit PP). EWDD's settlement benefits program has been characterized by low program participation; and the number of approved claimants who go on to sign up with a WorkSource center is even lower.

In addition to low program participation, Class Counsel's analysis of EWDD records for May 1-2022 through December 1, 2022 revealed that of 1,022 class members served by an EWDD provider, 192 received no actual settlement benefit, only "outreach" or "case management" for which providers are paid. Our analysis is attached as Exhibit QQ.

We will not attempt to enumerate every time we have raised this problem with Defendant, as it is obviously aware.

#### Attorneys' Fees & Costs

Class Counsel intend to seek attorneys' fees and costs for its work investigating, trying to address, and seeking enforcement related to the issues discussed above. Currently, we have incurred at least \$300,000<sup>13</sup> over the life of the settlement in our attempts to have the city fulfill its commitments under the settlement.<sup>14</sup>

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<sup>12</sup> See April 14, 2023 Report from the CAO, available at:

[https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3\\_rpt\\_cao\\_04-14-2023.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_rpt_cao_04-14-2023.pdf)

<sup>13</sup> This figure is based on a preliminary evaluation of our fees. Class Counsel reserve the right to revise the figure.

<sup>14</sup> For context, Defendant's financial records indicate that it has paid Ari Malka, Ph.D., the third-party evaluator at CalState Northridge, at least \$586,409. There is no evidence that these costly evaluations have resulted in any benefit to the class. In fact, on November 4, 2020, Class Counsel wrote the evaluator about several methodology and report deficiencies in the "Year Two and 2019-2020 Evaluation Reports." (See Exhibit RR). In contrast, Class Counsel have fielded over 900 calls from class members needing assistance navigating Defendant's deterrence to participation. Moreover, enforcing the settlement as described above will benefit the class as a whole.



Of that, approximately \$115,000<sup>15</sup> in fees are attributable to our work since January 2023, when we began investigating in earnest the Administrative Cost issue. Accordingly, we believe the Court will award us those fees.

**Conclusion**

Please provide us, by no later than close of business on Wednesday, November 1, 2023, your availability for a meeting before November 15, 2023 to discuss the issues explained above.

Sincerely,

/s/ Ghirlandi Guidetti

Ghirlandi Guidetti  
Staff Attorney

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<sup>15</sup> This figure is based on a preliminary evaluation of our fees. Class Counsel reserve the right to revise the figure.

**EXHIBIT Y-2**

Document Name	Exhibit to Plaintiff's October 27, 2023 Letter to Defendant Re: <i>Rodriguez v. L.A.</i> , Case No. CV11-01135 DMG (JEMx): Request to Meet and Confer about Plaintiffs' Planned Motion to Enforce the Settlement Agreement	Exhibit to Declaration of S. Carroll in Support of Motion to Enforce Settlement
<p>"Financial Report" for the period ending 06/30/23</p> <p>[Doc. Header: GANG INJUNCTION CURFEW (GIC) SETTLEMENT (LARCA 2.0) - Fund 10B]</p>	<b>A</b>	<b>L-2</b>
<p>September 19, 2023 Email from G. Guidetti to G. Ruvalcaba RE: LARCA Folder with EWDD Settlement Related Expenses</p>	<b>B</b>	<b>T</b>
<p>A&amp;P Report</p> <p>[Doc. Header: "EWDD Costing for Gang Injunction Curfew Settlement- (LARCA 2.0) Administrative &amp; Program Operations Cost"]</p>	<b>C</b>	<b>L-17</b>
<p>"Program Administration" narrative</p> <p>[Doc. Header: "Gang Injunction Curfew - LARCA 2.0 – Program and Administration"]</p>	<b>D</b>	<b>R</b>
<p>August 17, 2023 Email from G. Guidetti to J. Romero RE: LARCA Folder with EWDD Settlement Related Expenses [and email chain]</p>	<b>E</b>	<b>T, p. 3</b>

<p>September 1, 2023 Email from G. Ruvalcaba to G. Guidetti Re: LARCA Folder with EWDD Settlement Related Expenses</p> <p>With Attachments:</p> <p>PC Response - 9.1.23.pdf [Doc. Header: “Additional Public Counsel Questions”]</p> <p>Gang Injunction Curfew Settlement City Costs FY 16-17 to FY 23-24.pdf [Doc. Header: “Gang Injunction Curfew Settlement LARCA 2.0 Summary of City Costs From FY 16-17 to FY 23-24 For the Period Ended 7/31/2023”]</p>	<p><b>F</b></p>	<p><b>Q, S-1, S-2</b></p>
<p>Gang Injunction Curfew Settlement LARCA 2.0 Summary of City Costs From FY 16-17 to FY 23-24 For the Period Ended 7/31/2023 [Received Sept. 1, 2023]</p>	<p><b>G</b></p>	<p><b>S-2</b></p>
<p>“April 20, 2022 LARCA Report”</p> <p>[Doc. Header: “Gang Injunction Curfew Settlement Program Participant Expenditure Report Through April 2022”]</p>	<p><b>H</b></p>	<p><b>H-2</b></p>
<p>“January 9, 2023 EWDD Report”</p> <p>[Economic and Workforce Development Department, City of Los Angeles, Transmittal: Approval of Request from the Economic and Workforce Development Department (EWDD) to Allocate \$2.75 Million to the Gang Injunction Curfew (Rodriguez) Settlement Program (Jan. 9, 2023), available at <a href="https://clkrep.lacity.org/onlinedocs/2016/16-0081-s3_rpt_EWDD_01-09-23.pdf">https://clkrep.lacity.org/onlinedocs/2016/16-0081-s3_rpt_EWDD_01-09-23.pdf</a>.]</p>	<p><b>I</b></p>	<p><b>U</b></p>

<p>“February 14, 2023 LARCA Report”</p> <p>[Doc. Header: “Gang Injunction Curfew Settlement Program Participant Expenditure Report Through April 2022”]</p> <p>[Document preceded by cover email: February 14, 2023 Email from J. Romero to S. Carroll Re: Rodriguez v. City of L.A.   Notes from our meeting this morning]</p>	<p><b>J</b></p>	<p><b>K-2</b></p>
<p>“March 9, 2023 CAO report”</p> <p>[Office of the City Administrative Officer, City of Los Angeles, Report re: Request from the Economic and Workforce Development Department to Allocate \$2.75 Million to the Gang Injunction Curfew Settlement Program for Fiscal Year 2022-23 (Mar. 9, 2023), available at <a href="https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_misc_3-9-23.pdf">https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_misc_3-9-23.pdf</a>.]</p>	<p><b>K</b></p>	<p><b>V</b></p>
<p>“April 14, 2023, Report from the CAO”</p> <p>[Matthew W. Szabo, City Administrative Officer, City of Los Angeles, Report re: Amended Request from the Economic and Workforce Development Department to Allocate Additional Funding to the Gang Injunction Curfew Settlement Program for Fiscal Year 2022-23 (Apr. 14, 2023), available at <a href="https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_rpt_cao_04-14-2023.pdf">https://clkrep.lacity.org/onlinedocs/2016/16-0081-S3_rpt_cao_04-14-2023.pdf</a>.]</p>	<p><b>L</b></p>	<p><b>W</b></p>
<p>February 23, 2021 Letter from S. Carroll to S. Marcus and G. Ruvalcaba Re: Meet and confer related to a further extension of the claims process and training programs; further follow up on the Monitor’s reports</p>	<p><b>M</b></p>	<p>--</p>
<p>August 16, 2021 Email from S. Carroll to R. Renteria and G. Ruvalcaba, Subject: Rodriguez case meeting notes</p>	<p><b>N</b></p>	<p><b>AA</b></p>

<p>October 5, 2021 Email from M. Veas to S. Marcus and G. Ruvalcaba, Subject: Rodriguez v. City of Los Angeles</p> <p>With Attachment:</p> <p>2021 10 05 Letter to City for further extension.pdf                  [October 5, 2021 Letter from S. Carroll to S. Marcus and G. Ruvalcaba Re: Meet and confer related to a further extension of the claims process and training programs]</p>	<p><b>O</b></p>	<p>--                  [attachment included on own as exhibit HH, see below]</p>
<p>December 9, 2021 Email from M. Veas to S. Marcus RE: Rodriguez v. City of Los Angeles                  [and email chain]</p>	<p><b>P</b></p>	<p>--</p>
<p>August 15, 2022 Email from S. Carroll to S. Marcus and R. Mills, Subject: Rodriguez: Matters for Rule 7-3 Meet &amp; Confer</p>	<p><b>Q</b></p>	<p><b>I</b></p>
<p>December 9, 2021 Email from S. Carroll to R. Renteria and L. Sanchez, Subject: RE: FW: [Class Member name redacted]                  [and email chain]</p>	<p><b>R</b></p>	<p><b>Z</b></p>
<p>August 17, 2021 Email from S. Carroll to R. Renteria and G. Ruvalcaba, Subject: FW: External: [Class Member name redacted]                  [and email chain]</p>	<p><b>S</b></p>	<p>--</p>
<p>February 10, 2022 Email from S. Carroll to R. Renteria RE: Student Loan &amp; amazon cost status [and email chain]</p>	<p><b>T</b></p>	<p><b>DD</b></p>
<p>April 20, 2022 Email from R. Renteria to S. Carroll RE: Further request for follow up from Feb 16 meeting and continues concerns re: reimbursements [and email chain]</p>	<p><b>U</b></p>	<p><b>H-1</b></p>
<p>July 22, 2022 Email from S. Carroll to R. Renteria RE: Further delays in service provision and reimbursements to class members</p>	<p><b>V</b></p>	<p><b>FF</b></p>
<p>March 8, 2023 Email from S. Carroll to K. Henriquez and J. Romero RE: Class members [and email chain]</p>	<p><b>W</b></p>	<p><b>GG</b></p>
<p>May 3, 2023 Email from K. Henriquez to J. Chidiac RE: Public Counsel re [class member name redacted] [and email chain]</p>	<p><b>X</b></p>	<p><b>HH</b></p>

June 12, 2023 Email from K. Henriquez to G. Guidetti RE: Rodriguez (CV11-01135): [Class member name redacted] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center [and email chain]	<b>Y</b>	<b>OO</b>
May 12, 2023 Email from K. Henriquez to G. Guidetti RE: Rodriguez: Housing Assistance [and email chain]	<b>Z</b>	<b>PP</b>
May 4, 2023 Email from S. Carroll to G. Guidetti RE: FW: Housing Assistance	<b>AA</b>	<b>SS</b>
June 12, 2023 Email from G. Guidetti to S. Marcus; R. Mills; K. Eidmann; O. Orange; D. Stormer; S. Carroll; G. Ruvalcaba; J. Romero; K. Henriquez; C. Lee RE: Rodriguez v. L.A., Case No.,: CV11-01135 DMG (JEMx): Meet and Confer Re Enforcement	<b>BB</b>	<b>G</b>
“Supportive Services/Needs-Related Payments Policy”	<b>CC</b>	<b>L-18</b>
July 21, 2023 Letter from G. Guidetti to J. Romero Re: Denial of <i>Rodriguez</i> Class Members to Access to WIOA Benefits (WDS Directive 23-01); and Supportive Services/Needs-Related Payments Policy.	<b>DD</b>	<b>NN</b>
August 4, 2023 Letter from G. Ruvalcaba to G. Guidetti Response RE: Denial of Rodriguez Class Members to Access to WIOA Benefits (WDS Directive 23-01): And Supportive Services/Needs – Related Payments Policy	<b>EE</b>	<b>OO</b>
September 18, 2023 Email from G. Guidetti to K. Henriquez RE: Rodriguez – [class member name redacted] [and email chain]	<b>FF</b>	<b>QQ</b>
Copy of Public Counsel’s CAC Reports Analysis through October 2023  [Chart / Doc Header: Monthly Data Changes (average/month rounded to nearest whole)]	<b>GG</b>	<b>PP-1</b> [updated through December]

September 19, 2022 Letter from C. Hull to Los Angeles Reconnections Career Academy 2.0 Providers RE: WDS Directive No. 23-01 Los Angeles Reconnections Career Academy 2.0 CalJobs and Invoicing Guidelines, CalJobs Close-out instructions, and submission of success stories	<b>HH</b>	<b>RR</b>
August 13, 2021 Email from S. Carroll to R. Renteria and G. Ruvalcaba RE: FW: FW: [External]Certified Phlebotomy Technician [and email chain]	<b>II</b>	--
November 29, 2021 Email From S. Marcus to M. Veas and S. Carroll RE: Rodriguez v. City of Los Angeles [and email chain]	<b>JJ</b>	<b>SS</b>
January 11, 2022 Email from G. Ruvalcaba to M. Veas RE: Rodriguez v. City of Los Angeles [and email chain]	<b>KK</b>	<b>TT</b>
September 22, 2022 Email from S. Marcus to S. Carroll, O. Orange, L. Sanchez, M. Veas, E. Luna, C. Panuco RE: Fwd: Rodriguez: follow up from our Meet and Confer [and email chain]	<b>LL</b>	--
May 24, 2023 Email from S. Carroll to G. Guidetti RE: FW: Rodriguez v. City of L.A.   Notes from our meeting this morning [and email chain]	<b>MM</b>	--
October 11, 2023 Email from K. Henriquez to G. Guidetti RE: FW: Larca [and email chain]	<b>NN</b>	<b>UU</b>
“LARCA 2.0 Evaluation, Flash Report”	<b>OO</b>	<b>B-1</b>
City of LA Claims Status Report as of October 6, 2023  [Doc Header: CAC Services Group, LLC Header; City of LA Status Report as of October 6, 2023]	<b>PP</b>	<b>PP-6</b>
Public Counsel’s Analysis of EWDD records for May 1, 2022 through December 1, 2022  [Doc Header: Chart with first line entry reading: Arbor Rescare- Boyle Heights WorkSource Center- (Arbor E&T LLC) C-129710   Total 20; ]	<b>QQ</b>	<b>O</b>



November 4, 2020 Letter from S. Carroll to A. Malka Re: Questions related to CSUN's Year Two and 2019-2020 Evaluation Reports	<b>RR</b>	<b>XX</b>
October 5, 2021 Letter from S. Carroll to S. Marcus and G. Ruvalcaba Re: Meet and Confer related to a further extension of the claims process and training programs	<b>SS</b>	<b>BB</b>
January 26, 2022 Email from S. Carroll to R. Renteria RE: FW: Fwd: Loan and Amazon costs [and email chain]  With Attachment: University New Mexico Final Grades Print Out Sheet	<b>TT</b>	<b>II</b>

**EXHIBIT Z**

**Ghirlandi Guidetti**

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**From:** Stephanie Carroll <scarroll@publiccounsel.org>  
**Sent:** Thursday, December 9, 2021 3:10 PM  
**To:** Ricardo Renteria; Lupe Sanchez  
**Subject:** RE: FW:

Thank you Ricardo, we appreciate you following up – this seems to us to be an especially egregious delay in reimbursement and we would appreciate some insight into what has gone wrong in this case.

Steph

**From:** Ricardo Renteria <ricardo.renteria@lacity.org>  
**Sent:** Thursday, December 9, 2021 1:20 PM  
**To:** Lupe Sanchez <lsanchez@publiccounsel.org>  
**Cc:** Stephanie Carroll <scarroll@publiccounsel.org>  
**Subject:** Re: FW: [REDACTED]

Hello Lupe,

Following up with the Watts WorkSource Center Director for a status update on this case. I will report back as soon as I receive further information.

Thank you,

On Thu, Dec 9, 2021 at 12:54 PM Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)> wrote:

Hello Ricardo,

Thank you for working with [REDACTED]. I recently spoke with her and it is my understanding that this issue has not been resolved. Can you please let us know what the issue is for processing her reimbursement? Thanks.

Best,  
Lupe

**From:** Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>  
**Sent:** Friday, November 12, 2021 1:35 PM  
**To:** Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>  
**Subject:** Re: FW: [REDACTED]

Hello Lupe,

I have asked our Watts Los Angeles WorkSource Center to follow up with [REDACTED]. I have not received an update as of today. No further action is needed from your end. I am just waiting on Jasmine Houston to connect with [REDACTED].

I will make sure to provide an update as soon as I hear back from Jasmine.

Thank you.

On Fri, Nov 12, 2021, 1:17 PM Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)> wrote:

Hi Ricardo,

Do you have an update for [REDACTED] at this time? Is there any other information or documentation you still need from her to finalize her reimbursement?

Thanks,

Lupe

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**From:** [REDACTED]  
**Sent:** Friday, November 12, 2021 9:33 AM  
**To:** Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>  
**Subject:** [REDACTED]

Hello Mrs . Sanchez

We spoke a month or 2 ago reg [REDACTED] my husband who passed away after receiving his info to be reimbursed. I contacted you because I had reached out to the people he was in contact with and had provided all docs. When you first got me in contact with them they responded. Then I spoke to Ricardo Renteria and he explained he has to check to see if he was even offered a settlement. I let him know he was and exactly who we spoke to and what step he was in which was waiting to pick up his stuff. He asked me to fill out

paperwork to accept it as his wife because he doesn't know if I was enrolled. I read the paperwork even before filling it out it clesry states persons deceased can have it go to a family member. I followed up with 2 emails to see that status. I still leave yet to receive a response. I have been patient he was even patient during the process but to not respond is completely unacceptable. Please advise to move forward. Thanks in advance

Sent from my T-Mobile 4G LTE Device

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

--

Ricardo Renteria

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

(213) 744-9042 fax

[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

**EXHIBIT AA**

## Ghirlandi Guidetti

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**From:** Stephanie Carroll  
**Sent:** Monday, August 16, 2021 5:55 PM  
**To:** Ricardo Renteria; Gerardo Ruvalcaba  
**Cc:** Claudia Bracho; Megan Vees; Lupe Sanchez; Erika Luna  
**Subject:** Rodriguez case meeting notes

Dear Ricardo and Gerardo,

Thank you for meeting with us last week. Please see below for a summary of our meeting. Please let me know asap if there are any errors or omissions and get back to me about outstanding items by Friday August 27, 2021.

### WSC Staff Training

1. You noted that a new directive needs to be issued to WSC staff to cover the extension period for claims and training.
2. You confirmed that Ricardo meets regularly with WSC staff as a group. In addition, Ricardo meets with individual WSC each month, including administrative and support staff as well as those providing services directly to class members. At the monthly meetings:
  - a. Ricardo provides training and advice on following the latest directives and how to record services in CalJobs;
  - b. Case managers are encouraged to connect with community based organizations to improve outreach;
  - c. Case managers are reminded to outreach to those class members in the system, especially those who have soft-exited because they have not been receiving services for 90+ days;
  - d. Going forward, Ricardo will emphasize at every meeting:
    - i. Skills assessment tests are not required for class members, and the default must be that they are not used. Where an external provider mandates a pre-course assessment:
      1. Case managers should verify that the skills assessment is really required and make sure that they are not duplicating work (i.e., that the course provider will not also administer a test). It is understood that WSC use the same testing as LAUSD.
      2. Any requirement of testing by an external provider must be clearly explained to the class member so they understand it is not a condition of receiving benefits but related to the course provider they have chosen. In addition, assistance should be given to find courses that do not require such an assessment if the class member wishes or to ensure the class member is given additional supports to help them fulfil any pre-requisites.
    - ii. Class members should not be paying for equipment and supplies up front.
3. Ricardo also checks reports from WSC each month, reviewing the Cal JOBS activity codes and following up with WSC where necessary to make sure services are being provided and properly recorded.

### Outreach

1. You reported that peer-to-peer outreach is proving the most effective tool to recruit new class members; Claudia Bracho also confirmed this is the best source of new members. Homies Unidos in Central L.A.

and Detours in the Watts area have been especially prolific in generating new recruits, having brought in around 120 between them. You confirmed you are collecting data on peer-to-peer referrals and get copies of the claims forms.

2. With regard to the disconnect in numbers related to enrollment following the advertisements, you explained that you were counting the number of contacts received after the ads, not the number of class members actually enrolled in the same period.

### **Soft-exits**

You confirmed that soft-exits are built into the CalJobs system, but that WSC have been instructed never to exit anyone from the program and to continue outreach to reengage people with whom they have lost contact. You confirmed that class members previously in the system can continue to receive services, including by connecting with a new WSC if necessary, even if they “soft-exited” some years ago.

### **Testing**

With regard to the five people specified in my letter of April 22:

1. You confirmed that the two instances you had investigated were different than the five listed and that one of the instances you investigated was of named plaintiff Christian Rodriguez.
2. You confirmed that [REDACTED] was given the skills assessment and that this was not required for the course she chose (aesthetics).
3. As regards [REDACTED], you confirmed you are finding a secondary school to work with him to get him up to speed for the math requirements needed to enroll in an electrician’s training course.
4. You confirmed that [REDACTED] would not need to take a test as she was going into college.
5. You stated that neither [REDACTED] nor [REDACTED] had been required to take the test because they went into post-secondary education. Claudia disputed that, and both Ricardo and Claudia agreed to go back and investigate what the class members and case managers had to say.
6. You encouraged both class counsel and Claudia to raise any future issues with testing with you as soon as possible.
7. You agreed to send us the current basic skills assessment and any past versions during the pendency of the settlement period (you had agreed to send this in an email dated May 24).
8. I raised the issue of for profit schools being used for training and discussed some of the issues Public Counsel clients reported having related to schools in this sector. I encouraged you to vet any for profit schools where the settlement was paying for training. You confirmed that there is a list of approved institutions and agreed to share that list with us. I also asked that you make clear to case managers, and they should in turn make clear to class members, what the settlement would pay for at those institutions: if the for profit institution requires more, class members will have to pay for that themselves.
  - a. One point of clarification: I have in my notes that you said that one institution (UEI?) had been exempted from the need to be on the Eligible Training Providers List “to provide more flexibility” – do I have that down right? If so, why has this institution been exempted and what is the flexibility referred to? We would be most concerned if any for-profit institution not approved by the state was being paid money from this settlement.

### **HELPER contract**

You confirmed that all contracts that ran out on June 27 will be renewed by the end of this month.

### **Services to class members**



1. You agreed that case managers should investigate each individual's needs. For example, this would include determining their housing situation to see if they need rental assistance, and figuring out if they have computer access where required to participate in funded training/education.
2. Reimbursement: You confirmed that no class members should have to pay up front for fees, equipment or materials. The process is supposed to work such that class members let the case managers know their needs and the WSC buys directly whatever is required. Time is often of the essence in such situations and you acknowledged that there may have been some delays. You agreed to work with WSC to try to eliminate these delays and asked Claudia for specific examples, which she agreed to provide.

Please let us have the basic skills assessment, look into the testing situation re: [REDACTED] and [REDACTED] listed above, and clear up the issue about the potentially exempted For-Profit school. We look forward to hearing from you.

Many thanks,

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 Ext. 137  
Pronouns: she/her

**EXHIBIT BB**



*The nation's largest pro bono law firm*

Via Email only to: [Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org); [gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)

October 5, 2021

Scott Marcus  
Gerardo Ruvalcaba  
200 N. Main Street, Room 800  
Los Angeles, CA 90012

**Re: Meet and confer related to a further extension of the claims process and training programs**

Dear Scott and Gerardo,

This letter serves to request formally that we begin to meet and confer about a potential stipulation to a further extension of the claims process and training programs, each by an additional year, under the settlement. Our hope is to avoid unnecessary motions practice.

The primary reasons for this further extension are the ongoing pandemic and related insufficiency of resources at WorkSource centers. We are about a year and a half into the public health restrictions, and, given the high numbers of breakthrough cases, suboptimal vaccination rates, and proliferation of new variants of the virus, it is unclear when we can expect a wholesale reopening. Last month, the total number of deaths from Covid in Los Angeles County reached 25,000. The County continues to average over a thousand new cases per day. The vast majority of these new infections were caused by the highly contagious Delta variant. We continue to hear from several case managers about the difficulties they are experiencing due to Covid including:

- Class members' discomfort with going to WorkSource centers in person to complete paperwork or trainings;
- WorkSource centers being available by appointment only;
- Organizations experiencing staff outages and shortages due to the virus;
- Trainings and courses being postponed; and
- The further exacerbation of ongoing problems related to outreach, recruitment, and enrollment, including long delays in receiving responses from case managers, making appointments, and getting reimbursements.

This further extension was something that we contemplated when we discussed and agreed to the last extension. As in the first stipulation, in footnote 1 of the latest stipulation we advised the court, "The Parties ... recognize that they should reassess and review the extension at a later date in light of any developments in the global pandemic that may affect the provision of services in the future."

In addition, the current number of class members that have enrolled with WorkSource centers

October 5, 2021

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(785<sup>1</sup>) is less than 15% of the estimated number of class members (5,600) despite your additional outreach efforts, as well as ours. A number of approved class members have been unable to access services or were delayed in accessing services because WorkSource center staff did not return their calls. This appears to be the result of understaffing in many of the sites. Further, it is unclear how many of the 785 have accessed any real services, and how many staff have lost contact with.<sup>2</sup>

In addition, as we have raised in previous letters and discussed in meetings, a number of class members have been discouraged from accessing services because WorkSource centers have required them to undergo testing prior to receiving services. Though we appreciate your commitment to continue to remind WorkSource center staff that testing is not required for LARCA participants, we know that some class members have been required to undergo unnecessary testing.

Similarly, many class members have been told to pay for training or supplies out-of-pocket to be reimbursed at a later time. Many, if not most, class members are not in a financial situation to make these payments. Others have managed to make the upfront payments but have experienced financial hardship due to long delays in receiving reimbursements. The economic fallout of the ongoing pandemic has made it even more difficult for class members to afford out-of-pocket expenses and to make ends meet while awaiting reimbursement. We understand one of the most successful forms of outreach to class members is hearing about the program from current participants. However, if participants have to pay for benefits out-of-pocket and wait many weeks for reimbursement, they are unlikely to recommend the program to others. These problems with the delivery of services disincentivize class members from enrolling in the program.

Finally, as we mentioned in our letter of September 28, 2021, we are concerned that many class members will face even higher barriers to accessing services because five WorkSource centers recently ceased providing services to the class.<sup>3</sup> We also note that the reason given for the termination of these providers' contracts (i.e., "their [lack of] staff capacity to recruit, enroll, and provide program services to eligible members") is in line with our concerns highlighted above.

While your team has been working with us to resolve these issues, despite numerous conversations, many of these issues have not been resolved and continue to pose barriers to program enrollment and delivery of services.

We look forward to scheduling a call to meet and confer regarding a stipulated extension of the program. We are available to meet and confer at your convenience. Please let us know some dates and times that work for you.

---

<sup>1</sup> Calculated from information provided by Dr. Malka on March 1, 2021 and September 8, 2021.

<sup>2</sup> We have yet to receive a response to our September 17, 2021 email asking about how many enrolled class members have actually received services.

<sup>3</sup> This is in addition to WorkSource centers being so overwhelmed that many class members have been unable to receive the services they need.

October 5, 2021

Page 3

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephanie Carroll', written in a cursive style.

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
E-mail: [scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)  
Tel: (213) 385-2977 Ext. 137

Regina Mills, [regina.mills@lacity.org](mailto:regina.mills@lacity.org)  
Ricardo Renteria, [ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)  
Dan Stormer, [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com)  
Olu Orange, [oluorange@att.net](mailto:oluorange@att.net)  
Ariel Malka, [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**EXHIBIT CC**

## Ghirlandi Guidetti

---

**From:** Stephanie Carroll <scarroll@publiccounsel.org>  
**Sent:** Wednesday, January 26, 2022 10:34 AM  
**To:** Ricardo Renteria  
**Cc:** Gerardo Ruvalcaba; Lupe Sanchez; Megan Veas  
**Subject:** RE: FW: Fwd: Loan and Amazon costs

Hi Ricardo,

I do not understand why this can be the case – especially when this person has already been waiting for so long. Can you please intervene to expedite this? We cannot expect class members to shoulder these costs in the meantime – they do not have the resources to do so.

Thanks

Steph

**From:** gdiaz@mcs-careergroup.com <gdiaz@mcs-careergroup.com>  
**Sent:** Wednesday, January 26, 2022 10:27 AM  
**To:** Ricardo Renteria <ricardo.renteria@lacity.org>  
**Cc:** Stephanie Carroll <scarroll@publiccounsel.org>; Gerardo Ruvalcaba <gerardo.ruvalcaba@lacity.org>; Lupe Sanchez <lsanchez@publiccounsel.org>; Megan Veas <mvees@publiccounsel.org>  
**Subject:** Re: FW: Fwd: Loan and Amazon costs

Hi Ricardo,

Please note payments take between four to six weeks for check to be release to my office. I will then notified [REDACTED] when checks are ready for pick up.

Thank You  
Guadalupe Diaz

-----Original Message-----

From: "Ricardo Renteria" <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>  
Sent: Tuesday, January 25, 2022 4:27pm  
To: "Stephanie Carroll" <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>  
Cc: "Gerardo Ruvalcaba" <[Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org)>, "Lupe Sanchez" <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>, "Megan Veas" <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>  
Subject: Re: FW: Fwd: Loan and Amazon costs

Hello Stephanie,

Thank you for the update. The service provider did report moving forward with [REDACTED] request on January 18th. I will follow up once again and request a status update.

Thank you,

On Tue, Jan 25, 2022 at 4:17 PM Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)> wrote:

Dear Ricardo,

██████████ is still being denied funds – she spoke to Lupe this morning; please can you look into this as a matter of urgency and let us know what the problem is?

Many thanks,

Steph

**From:** Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>

**Sent:** Monday, January 10, 2022 11:14 AM

**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org)>; Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Megan Vees <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Subject:** Re: FW: Fwd: Loan and Amazon costs

Good Morning Stephanie,

Happy New Year to you! I will follow up with our contractor to ensure they proceed with this request as soon as possible.

Thank you,

On Mon, Jan 10, 2022 at 11:11 AM Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)> wrote:

Dear Ricardo and Gerardo,

Happy New Year to you both. Please see the email thread below. I had expected the supportive services funding piece to be sorted by the end of December – can you let me know if that is not the case? Assuming it has been sorted, is there anything that can be done here, given that overall City spending on the settlement is still far off from the settlement total?

Many thanks,

Steph

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 Ext. 137  
Pronouns: she/her

---

**From:** Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>

**Sent:** Thursday, January 6, 2022 11:35 AM

**To:** Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>

**Subject:** FW: Fwd: Loan and Amazon costs



**From:** [gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com) <[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)>

**Sent:** Thursday, December 30, 2021 12:00 PM

**To:** [REDACTED] >

**Cc:** Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [efernandez@helperfoundation.org](mailto:efernandez@helperfoundation.org); [ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

**Subject:** Re: Fwd: Loan and Amazon costs

Good morning [REDACTED],

Please note for now we are out of funding for supportive services. Please note I had to service other class members that had been waiting for first time assistance. In your case here is the breakdown of services you have received. For supportive services \$2487.47, \$500.00 for Work Readiness workshop and \$12,953.85 for student loans.

Until further notice I am not able to process your receipts for amazon in the amount of \$80.96 and also the new student loan bill you submitted in the amount of \$11,894.00.

Thank You

Lupe

-----Original Message-----

**From:** "[REDACTED]"

**Sent:** Tuesday, December 21, 2021 10:59am

**To:** [gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)

**Cc:** "Erika Luna" <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>, [efernandez@helperfoundation.org](mailto:efernandez@helperfoundation.org), [ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

**Subject:** Re: Fwd: Loan and Amazon costs

Sorry for the inconvenience I just seen it didn't post correctly so I have included it as an attachment.



**Student** Financial Aid Employee Payment

**Search**

**View Final Grades**

**Student Information**

**Current Program**

BS in Nursing  
**Level:** Undergraduate  
**Program:** BSN Nursing  
**Admit Term:** Fall 2018  
**Admit Type:** Freshman w/College During HS  
**Catalog Term:** Fall 2018  
**College:** University College  
**Campus:** Albuquerque/Main  
**Major and Department:** Nursing, College of Nursing  
**Minor:** Criminology  
**Academic Standing:**

**Undergraduate Course work**

CRN	Subject	Course	Section	Course Title	Campus	Final Grade	Attempted	Earned
66403	PHED	1410	001	Yoga I: Beg Yoga	Albuquerque/Main	A+	2.000	2.000
68989	SOCI	312	001	Causes of Crime and Delinquency	Albuquerque/Main	A+	3.000	3.000
68994	SOCI	371	001	Sociological Theory	Albuquerque/Main	B	3.000	3.000
71045	SOCI	427	001	Sociology of Madness	Online & ITV	A	3.000	3.000

**Undergraduate Summary**

	Attempted	Earned	GPA Hours	Quality Points	GPA
<b>Current Term:</b>	11.000	11.000	11.000	42.65	3.87
<b>Cumulative:</b>	89.000	81.000	81.000	282.59	3.48
<b>Transfer:</b>	22.000	22.000	0.000	0.00	0.00
<b>Overall:</b>	111.000	103.000	81.000	282.59	3.48

On Tue, Dec 21, 2021 at 10:55 AM [REDACTED] wrote:

Good morning, Lupe. I am following up on my email(s) that I sent to you on or before September 30, 2021. Has there been any updates in my file? I just arrived home from school for the holidays and was hoping that I would be able to secure assistance as, once I leave, I will be entering the Spring semester. I have also attached a

screenshot of my Fall 2021 grades for your review. I would appreciate any assistance you can provide. Happy holidays!

Kind regards,  
[REDACTED]

On Thu, Oct 14, 2021 at 10:11 AM [REDACTED] wrote:

Good morning, Lupe. I wanted to follow up regarding my previous emails sent to you on 9/29/2021 and 9/30/2021. Can you confirm that the information provided was sufficient? If not, please let me know what other documents I need to provide so that the file can be completed. Additionally, do you know when the check for \$500 will be distributed? I am in Los Angeles until Sunday for a doctor appointment and, if possible, I'd like to see if I can pick up the check before I leave back to New Mexico. Please let me know.

Thank you and have a great day!  
[REDACTED]

----- Forwarded message -----

From: [REDACTED]

Date: Thu, Sep 30, 2021 at 8:17 PM

Subject: Re: Fwd: Loan and Amazon costs

To: <[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)>

Cc: Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>, <[efernandez@helperfoundation.org](mailto:efernandez@helperfoundation.org)>, <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>

Good evening, Lupe. I just received another letter from MyFedLoan regarding the financial activity summary. I have attached the new letter, along with the older letters to reconcile all of your records against. If you review the document(s), you can see that the payments were all received and posted. Hopefully this will answer any concerns that you may have. As I mentioned in a previous email, I am currently working towards earning my degree in Nursing with a Minor (or possible double Major) in Criminology. Because I have a learning disability, I take a slightly smaller course load and will take a little longer to graduate. This is also the reason why I have a service dog living with me on campus. If you would like me to connect you with my Case Worker at Accessibility Resource Center, I would be happy to do so. Please let me know if you have any questions or concerns, otherwise, I hope to hear from you soon regarding the additional documents that I have provided.

Thank you.  
[REDACTED]

On Wed, Sep 29, 2021 at 1:08 PM [REDACTED] wrote:

Good afternoon again, Lupe. I just spent the last hour on the phone with the servicer and eventually escalated to a supervisor in hopes of receiving additional information related to the payments. Rachel, the supervisor, sent me over the attached document via my online account. I am hoping that this will answer any questions that you still have. The only other alternative, she confirmed, is for you and I to call on 3-way so that she can explain via telephone what their processes are. Please let me know if you'd like to do that so I can schedule a time in between classes to call you and the loan servicer. I have attached a copy of the updated letter as well as the documents that I sent to you in the previous email so that all documents remain on the same chain. Please let me know if you have any questions.

On Wed, Sep 29, 2021 at 11:30 AM [REDACTED] wrote:

Good morning, Lupe. I understand that you are looking at the statement and it might cause some confusion. Because i took the loan out in February and the payment was made less than 120 days after the fact, it was

considered a cancellation payment. This is why I contacted the Loan servicer yesterday. I spent about an hour on the phone with them between classes and that is why I sent you the letter that I received this morning specifically stating and confirming that they received the payment for \$12,935.85. I have provided everything you have ever requested from me within 24 hours of any requests and have never acted in a way that could insinuate that I would take advantage of this situation. If you read the wording on the letter they wrote, you can clearly see that they have received the payment in full, however, if you are not familiar (as I was not) with their process and how they determine what a loan payment is designated) then it looks quite confusing on the paperwork. If you would like to be on a 3-way call, I am happy to contact you via telephone and we can call them so that you can receive yet another form of verification that the payment was received and applied to my previous loan balance. The loans that I have just sent to you were only for Summer and Fall 2021, which were not in existence at the time of the previous payment. Please let me know how you'd like me to proceed.

Thank you.

On Wed, Sep 29, 2021 at 11:19 AM <[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)> wrote:

Thank You for submitting your transcripts.

In regards of the previous payment made to Fedloan back on April in the amount of \$12,935.85 the statement that I processed had an amount for February 1, 2021 in the amount of \$3800.00 I have attached previous statement. Regarding your new statement under paid in full the month of February it's not reflecting the payment that we process. Please keep us posted.

Thank You

Lupe

-----Original Message-----

From:

Sent: Wednesday, September 29, 2021 10:02am

To: [gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)

Cc: "Erika Luna" <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>, [ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

Subject: Re: Fwd: Loan and Amazon costs

Good afternoon again, Lupe. The check (# 13505 | dated 2/25/2021) that was previously provided to me was made payable to FedLoan Servicing. I was never a direct recipient listed and therefore, it would have been impossible for me to cash it. I called the loan servicer yesterday to get a verification for the payment received for \$12,935.85. I have highlighted the section which reflects the payment. Per your request, I have attached a copy of this document to this email.

Additionally, I have attached a copy of my unofficial transcript for your review. As we discussed a few times in the past, I take a reduced course load because I have a learning disability. I am just entering my fourth year of college, however, I still have about 2 years to go - due to the previously mentioned reduced course load combined with COVID related delays in available nursing classes / testing. To clarify, the program that I am enrolled in is not a trade school or short term program. I am currently enrolled as a full-time student at the University of New Mexico (UNM) and am working to pursue a Bachelor's degree in Nursing and Criminology.

I do not qualify for much financial aid as I am considered a dependent student even though I am 21 years old. I only have one parent as my dad, who was the subject in the gang injunction, was murdered when I was only 3 years old. My brother is a current student at the University of California, Santa Cruz (UCSC), and is living on campus and my mom is currently *trying* to help both of us with living expenses, but is overwhelmed. As you can imagine, having 2 full-time college students is extremely expensive.

In any case, any assistance you can provide in this process would be greatly appreciated. I believe that I have provided you *everything* I could possibly provide. Should you have any additional questions or concerns, though, please feel free to contact me.

Thank you!

[REDACTED]

On Mon, Sep 27, 2021 at 11:36 AM <[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)> wrote:

Good morning [REDACTED],

I hope you had a great weekend. We need you to please provide us with a copy of your transcripts. Also we notice that on the recent statement you submitted from fedloan it only shows that you have paid \$9000.00 and we have assisted you with \$12,935.85 in student loans please submit payment records that reflects the up-to-date payments that have been accredited to your account. We also need to know how much longer do you have to complete your course?

Thank You  
Lupe

-----Original Message-----

From: [REDACTED]  
Sent: Friday, September 24, 2021 1:16pm  
To: [gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)  
Cc: "Erika Luna" <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>  
Subject: Re: Fwd: Loan and Amazon costs

Good afternoon, Lupe. The documents that I sent to you yesterday on 9/24, were inclusive of all fees I have incurred for Summer 2021 and Fall 2021. The Fedloan 'loan verification letter' shows the loans that were taken out on 7/14 for the summer session for \$1700 and \$1150 totalling **\$2,850** and then on 8/18 I took additional loans out for part of my Fall 2021 tuition for \$2,750 and \$2750 totalling **\$5,500**. The total amount taken out in loans is **\$8,350**. The payment for this would be sent to the same vendor as the one that you previously approved payment for (Check # 13505 to FedLoan Servicing).

The \$3544.89 payment I made directly to my school was money I borrowed because my account had a hold on it and I couldn't access vital school records including transcript information. I borrowed this money from my uncle with the intention of paying him back once I was approved for payment or when I could apply for more loans through my school.

Just to recap, the payment for \$8,350 would be made directly to FedLoan Servicing. The \$3,625.85 (\$3,544.89 + \$64.25 + \$16.71) would be paid to me because these were already paid by me. I will include the list of items below once again so that you are able to review the amounts. I have also attached a copy of the same receipts so that they will remain in one email to make things easier to reconcile. Please let me know if you have any additional questions.

1. Fed Loan Financing - Loan Verification Letter for summer and Fall 2021 tuition fees totalling \$8,350
2. Amazon receipt for textbook totalling \$64.25
3. Amazon receipt for textbook totalling \$16.71
4. University of New Mexico payment receipt of \$3,544.89 (Note: I had to borrow money to make this payment because I had a hold on my account since my tuition wasn't paid in full and I wasn't eligible for additional loans)

I don't have any additional amounts pending for Summer / Fall 2021 unless the University of New Mexico (UNM) sends me a bill for online access or tech fees but at the current time, there is nothing pending on my school's bursar account (financial aid account). As always, thank you for your continued help and support with this. I truly appreciate all of your hard work that you do to help me! Have a great day and a wonderful weekend!

[REDACTED]

On Fri, Sep 24, 2021 at 11:23 AM <[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)> wrote:

Good morning [REDACTED],

I have a question regarding pending student loan amount. I have your payment of \$3544.89 and I also have the print out that you email me back in July of \$2,460.24 and Fedloan of \$8,350.00.

Can you please explain to me apart from the money that you already paid how much more is pending to be paid and would payment be made to Fedloan Servicing?

Please advise

Thank You

Lupe

-----Original Message-----

From: [REDACTED]

Sent: Thursday, September 23, 2021 4:51pm

To: [gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)

Cc: "Erika Luna" <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>

Subject: Fwd: Loan and Amazon costs

Hi Lupe, per our telephone conversation, I have attached a copy of the documents you requested, which include the following:

1. Fed Loan Financing - Loan Verification Letter for summer and Fall 2021 tuition fees totalling \$8,350
2. Amazon receipt for textbook totalling \$64.25
3. Amazon receipt for textbook totalling \$16.71
4. University of New Mexico payment receipt of \$3,544.89 (*Note: I had to borrow money to make this payment because I had a hold on my account since my tuition wasn't paid in full and I wasn't eligible for additional loans*)

These are all of the student loans, payments, and receipts that I have incurred for Summer 2021 and Fall 2021. Please let me know if you need any additional information and I will provide it to you as soon as possible. Have a great day and thank you for your continued support and assistance with this matter.

[REDACTED]

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

--

Ricardo Renteria

Sr. Project Coordinator  
Economic and Workforce Development Department  
1200 W. 7th St, 6th floor  
Los Angeles, CA 90017  
(213) 744-9709 wk  
(213) 219-4027 cell  
(213) 744-9042 fax  
[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

--

Ricardo Renteria  
Sr. Project Coordinator  
Economic and Workforce Development Department  
1200 W. 7th St, 6th floor  
Los Angeles, CA 90017  
(213) 744-9709 wk  
(213) 219-4027 cell  
(213) 744-9042 fax  
[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)

*Best Regards,*

*Guadalupe Diaz  
Sr. Career Coach  
MCS/Hollywood WorkSource Center  
4311 Melrose Ave  
Los Angeles, CA 90029*

*Office 323-454-6105*

*Cell 213-215-7929*

*Fax 323-454-6198*

*TTY 711*

*[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)*

*Equal Opportunity Employer/Program*



**EXHIBIT DD**

## Ghirlandi Guidetti

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**From:** Stephanie Carroll  
**Sent:** Thursday, February 10, 2022 10:14 AM  
**To:** Ricardo Renteria  
**Cc:** Gerardo Ruvalcaba; Lupe Sanchez; Megan Vees; Cindy Panuco  
**Subject:** RE: Student Loan & amazon cost status

Hi Ricardo and Gerardo,

Below is the timeline that Lupe Sanchez from my team put together reflecting the back and forth between [REDACTED] and Guadalupe re her reimbursement request to cover school costs. As I stated in my last email, I think we need to meet to figure out how we can avoid a similar situation and I repeat my entries to intervene to expedite her reimbursement. Please let me have some times when we can meet next week. Currently I am available Monday after 2p.m. if that works?

Best,

Steph

[REDACTED] sent a follow-up email (following up from a phone conversation) to Lupe on **September 23, 2021** where she attached the following documents that Lupe requested:

1. Loan Verification Letter (\$8,350)
2. Amazon textbook receipts (\$80.96)
3. Tuition payment to University of New Mexico (\$3,544.89)
- 4.

This is all documentation showing [REDACTED] educational costs for *Summer and Fall of 2021*. Please note that [REDACTED] had to borrow \$3,544 from her uncle to cover the rest of her tuition for Fall 2021 because there was a hold on her account. This personal loan + the Amazon textbook payments are what [REDACTED] is seeking reimbursements for.

Lupe responded to [REDACTED] email on **September 24, 2021** asking [REDACTED] a clarifying question about how much more [REDACTED] had to pay in school fees.

[REDACTED] replied later that same day with a detailed breakdown of the payments made for Summer and Fall 2021 sessions (\$8,350). She also explained how she had to borrow money from her uncle to cover the rest of her Fall 2021 tuition.

Lupe replied on **September 27, 2021** requesting a copy of [REDACTED] transcript. She also asked [REDACTED] to send an updated payment record to reflect payments [REDACTED] made towards her student loans. Lupe also asked [REDACTED] how much longer she had until she completed her course.

[REDACTED] replied on **September 29, 2021**. She attached a copy of her transcripts and explained that she takes a reduced course load due to having a disability. [REDACTED] also stated that she has about 2 years left in her program (she is pursuing a Bachelor's in Nursing and Criminology). [REDACTED] also attached a verification letter from her loan servicer per Lupe's previous request.

Lupe then replied later that same day stating that the attachment from [REDACTED] previous email did not reflect the information requested.

█████ replied later that same day explaining how she spoke with the loan servicer to confirm the payments made. █████ also provided a detailed explanation of her previous attachment, and in a follow up email that same day, offered to hop on a 3-way call with Lupe and the loan servicer to clear up any confusion.

*Lupe did not reply to either one of these emails.*

█████ sent follow-up emails on **September 30, 2021; October 14, 2021; and December 21, 2021.**

Lupe replied on December 30, 2021 saying that LARCA was out of funding for support services, and that she would not be able to process █████ reimbursement requests (from her September 2021 email).

This was the last email █████ received from Lupe. I spoke with █████ today and verified that Lupe has not been in touch with █████ since December. Had I not told █████ that her reimbursement was being processed, there was no way she would be aware of that now. I told her that I would check in next week to verify that her check was ready for pick up.

**From:** gdiaz@mcscareergroup.com <gdiaz@mcscareergroup.com>

**Sent:** Wednesday, February 9, 2022 10:37 AM

**To:** Ricardo Renteria <ricardo.renteria@lacity.org>

**Cc:** Gerardo Ruvalcaba <gerardo.ruvalcaba@lacity.org>; Lupe Sanchez <lsanchez@publiccounsel.org>; Megan Vees <mvees@publiccounsel.org>; Stephanie Carroll <scarroll@publiccounsel.org>

**Subject:** Student Loan & amazon cost status

Good morning Ricardo,

Please be advise that █████ request for reimbursement was submitted to my accounting department right after our meeting when we were authorized to proceed with funding as of **January 19, 2022.**

█████ was notified right away over the phone that we had been authorized to move forward with her request and will take between four to six weeks for payments to be at my office. Total amount for supportive services includes her housing fees a total amount of \$3,625.85 plus her student loan of \$8,350.00

It's our internal process and every client it's aware of our time frame. Please be advise that we have schedules to follow.

Her checks should be at our office no later than the 17 of this month. As soon as checks get to my office I will notified █████

Thank You

*Guadalupe Diaz*

*Sr. Career Coach*

*MCS/Hollywood WorkSource Center*

*4311 Melrose Ave*

*Los Angeles, CA 90029*

*Office 323-454-6105*

*Cell 213-215-7929*

*Fax 323-454-6198*

*TTY 711*

*[gdiaz@mcscareergroup.com](mailto:gdiaz@mcscareergroup.com)*

*Equal Opportunity Employer/Program*

**EXHIBIT EE**

## Ghirlandi Guidetti

---

**From:** Ricardo Renteria <ricardo.renteria@lacity.org>  
**Sent:** Wednesday, April 20, 2022 1:48 PM  
**To:** Stephanie Carroll  
**Cc:** Gerardo Ruvalcaba; Megan Vees; Lupe Sanchez; Clerk  
**Subject:** Re: Further request for follow up from Feb 16 meeting and continues concerns re: reimbursements  
**Attachments:** Rodriguez\_LARCA 2.0- Participant Expenditure Report- 04162022 (1).pdf

Good Afternoon Stephanie,

Hope you are well. Attached you will find the participant expenditure report. After consulting with Emoli, she has proposed the following dates and times to conduct the CalJOBS program activity code overview. Please advise which of the following dates work best for you and your team.

**Wednesday, May 4th, 2022, 2:00 p.m.-3:00 p.m.**

**Thursday, May 5th, 2022, 10:00 a.m.- 11:00 a.m.**

I will connect with Dr. Malka to schedule a call to coordinate the request to analyze a random sample of class members. I will make sure to provide updates soon after. As it relates to the Directive, we will make sure to release an updated version soon after Emoli facilitates the activity code overview. I want to make sure all necessary updates are captured in the new Directive.

In relation to [REDACTED], I am working closely with the service provider to ensure we provide the class member with the reimbursement as soon as possible. [REDACTED] confirmed to pick up her reimbursement check today.

Thank you,

On Fri, Apr 15, 2022 at 11:22 AM Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)> wrote:

Dear Gerardo and Ricardo,

As we have not received any response to our February 24 letter or our emails of March 9 and March 23, we are concerned that there has not been progress on any of the steps we agreed upon in the February 16 meeting to ensure that class members have access to meaningful services. These included having Dr. Malka analyze a random sample of class members, issuing a new Directive removing the requirement for class members to participate in financial literacy training, and meeting with Emily Mendez to review the various types of services that can be entered in CalJobs. In addition, you agreed to provide by mid-April a breakdown of program spending by class member. We have now arrived in mid-April and have yet to receive any update from you on your progress in generating this report. Please provide an update on the program spending breakdown and a proposed timeline of next steps on each of the action items identified in the February 24 letter by [date].

We also wanted to revisit [REDACTED] and [REDACTED] reimbursement requests. [REDACTED] submitted a refund request in the amount of \$9,797.10 to cover her Spring tuition on or before March 8. Ricardo has been looped in on emails between [REDACTED] and her caseworker, but [REDACTED] has still not received the reimbursement. [REDACTED] refund request is for school loans that helped cover tuition and housing for the Fall 2021 and Spring 2022 academic terms (see attached receipts). [REDACTED] requested this reimbursement on July 11, 2021. We had hoped after our meeting in February that reimbursement delays would not be an ongoing issue, but clearly they remain a problem. Please take any steps you can to ensure that [REDACTED] and [REDACTED] are reimbursed as soon as possible and please update us of progress on this matter, and the matters outlined above by **no later than Wednesday April 20, 2022.**

Best,

Steph

Stephanie Carroll

Directing Attorney

Consumer Rights & Economic Justice

Tel: 213-385-2977 ext. 137

Pronouns: she/her/hers

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--

Ricardo Renteria

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

(213) 744-9042 fax

[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)



**EXHIBIT FF**

## Ghirlandi Guidetti

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**From:** Stephanie Carroll  
**Sent:** Friday, July 22, 2022 10:48 AM  
**To:** Ricardo Renteria  
**Cc:** Gerardo Ruvalcaba; Megan Vees; [ ORANGE ] (oluorange@att.net); Lupe Sanchez; Cindy Panuco; Dan Stormer (dstormer@hadsellstormer.com)  
**Subject:** Further delays in service provision and reimbursements to class members

Dear Ricardo,

I wanted to follow up on matters that demonstrate that class members are still waiting months for services and reimbursements.

- 1) [REDACTED]. We have had no response from you as to when [REDACTED] computer costs (around \$1200) will be paid. [REDACTED] former caseworker, Alejandro Morales, assured him he would be reimbursed for this expense. In your email to Lupe on 6/29/22 you stated that [REDACTED] received a payment for his "state license training" in the amount of \$1,995, plus "Rent support and support covering his union dues" in the amount of \$1,755. Lupe responded on July 6 and July 13 to inquire again about the costs of the computer [REDACTED] bought that he requested reimbursement for on April 8. Please can you confirm as a matter of urgency when [REDACTED] will get reimbursed?
- 2) [REDACTED]. I understand he has recently been assigned a new case manager but he told us that his prior caseworker, Alejandro Morales (the same case worker as for [REDACTED]) told him in April that he would have to wait until July for any services. Can you please tell me why that would be the case? As I understand it, the city had a budget issue at the end of last year because the city had not approved Worksource center allocations in the amount necessary and there was some delay getting increased allocations approved. We were assured that this problem had been rectified and would not happen again. As such, please can you explain why class members are experiencing delays in receiving services?
- 3) Given that Alejandro Morales was assigned to both of these class members, can you please ensure the other class members assigned to Mr. Morales are contacted to secure their continued engagement with the program so that they receive the services to which they are entitled?

I would appreciate a response at your earliest convenience.

Steph

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

**EXHIBIT GG**

## Ghirlandi Guidetti

---

**From:** Stephanie Carroll  
**Sent:** Wednesday, March 8, 2023 2:10 PM  
**To:** Karina Henriquez; Juan Romero  
**Cc:** Erika Luna; Jackie Chidiac; [ ORANGE ] (oluorange@att.net); Dan Stormer (dstormer@hadsellstormer.com); Cindy Panuco  
**Subject:** RE: Class members

Dear Juan and Karina,

First, thank you Karina for the prompt response to Erika – we really do appreciate the improved service you and Juan are providing.

However, I am writing because I think there needs to be a wholesale review of the work El Proyecto del Barrio has been doing and to make sure that all class members working with James get a direct line to someone (preferably in your office) who can sort out their issues promptly. While we understand there is now a motion pending before the City Council, class members are getting very agitated as the current deadlines for the end of the settlement are looming. As I mentioned in my earlier email to Scott, almost all of the complaints we are getting relate to James and El Proyecto and, despite numerous assurances that matters will be looked into and addressed, the problems remain unresolved or resurface. One class member texted Erika last week and said he was getting other class members together to file a lawsuit which is something we all want to avoid.

I am happy to meet with you both to discuss a way forward. I would suggest, as a first step, that you reach out to all the class members served at El Proyecto (51 in all from the recent fiscal tracking sheet) to ask if they have outstanding or unresolved issues and commit to working with them to resolve those issues within the boundaries of the settlement. Such a step would show that the city is hearing their concerns. Again, happy to discuss and I look forward to working with you to address these issues as quickly and effectively as possible.

Best,

Steph

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

---

**From:** Erika Luna <eluna@publiccounsel.org>  
**Sent:** Wednesday, March 8, 2023 10:59 AM  
**To:** Karina Henriquez <karina.henriquez@lacity.org>  
**Cc:** Romero, Juan <juan.romero@lacity.org>; Stephanie Carroll <scarroll@publiccounsel.org>; Jackie Chidiac <jchidiac@publiccounsel.org>  
**Subject:** RE: Class members

Hi Karina,

I am following up on your response below regarding the matter of [REDACTED].

We have sent several emails regarding the case of [REDACTED], prior to my email below we also reached out to Ricardo Renteria back in December of 2022 (attached here).

[REDACTED] has been meeting with James to discuss his plans to start a construction business. While [REDACTED] appreciates the business start-up information he's been receiving from James he is still waiting to receive reimbursement for the repairs that were done to his vehicle. He requested assistance and submitted an invoice to James to repair his truck \$2,550 but his request was not fulfilled and [REDACTED] was told that Proyecto del Barrio was out of funds again. Therefore [REDACTED] was forced to request a payment plan from the shop in order to use his vehicle to get to work, and he endured an additional \$500 cost to finance that payment plan. [REDACTED] is still making payments to the repair shop. He also submitted to James the Best Buy link for the laptop \$3,466 he needs to handle his business. Documents for these requests were submitted to James in December of 2022.

[REDACTED] has been consistently and patiently cooperating with James since April of 2022 providing documentation as needed. Just this week James requested proof of insurance and pink slip to prove that he owns that truck he uses for work and he submitted that by email right away.

Can you look into this as a matter of urgency and ensure that [REDACTED] receives the assistance he has long been waiting for?

We appreciate your attention to this matter.

Best,

Erika

**From:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>

**Sent:** Tuesday, January 24, 2023 10:43 AM

**To:** Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>

**Cc:** Ana Torres <[atorres@publiccounsel.org](mailto:atorres@publiccounsel.org)>; Carol Torres <[ctorres@publiccounsel.org](mailto:ctorres@publiccounsel.org)>; Romero, Juan <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Subject:** Re: Class members

Good morning Erika,

I've included Juan on this reply. We will work on sending over a resolution response regarding the claimants listed on your email.

Take care.

On Tue, Jan 24, 2023 at 10:13 AM Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)> wrote:

Hi Karina and Juan,

Karina, would you be so kind to forward this email to Juan Romero please, I did not get his email address. Thank you.

We are reaching out to you on some outstanding class member issues for which we communicated directly to Ricard Renteria since last year. Please note, we are not taking a position about whether these class members should be approved for any particular expense but we are concerned when they are told one thing and something else happens, or when they are promised reimbursement or contact which never materializes. We thank you in advance for looking into these issues.

██████████ Requested financial assistance from Alex Morales and was given an initial \$4,000 check in early march of 2022 without submitting any receipts. On May 26 ██████████ wrote another email to Alex Morales requesting additional support but was told that the Proyecto del Barrio was out of funds. On July 26, 2022 ██████████ emailed James an invoice to repair his car, which is his transportation for work, for \$2429.76. He also submitted an application to rent an apartment for him and his family, the total sum to get the apartment was \$3,700 including application and admin fee plus 1<sup>st</sup> and last month's rent. Even though James replied to ██████████ the next day on that request, and it was still the month of July, James said the new LARCA program year runs from July 2022 to June of 2023 and the WSC was already out of funds. From then on ██████████ sent follow up emails on July 30, and August 5<sup>th</sup> with James but he was told there was still no funds for his 2<sup>nd</sup> check and that he had to wait. And that's been the story ever since, that there was no money for more checks. We emailed Ricardo Renteria about this matter on 11/17/22, Ricardo replied the next day saying that he will have James reach out to members as soon as possible. As of this day ██████████ has not heard anything from James or anyone from Proyecto del Barrio. ██████████ was relying on getting the 2<sup>nd</sup> check but because the funds were available he was not able to get the apartment. Do you have an update on the requests for ██████████?

██████████: Received a \$4,000 check back in 2021 and spent most of 2022 following up with Mr. James on the second \$6,000 check that she was told she had been approved for. We emailed Ricardo Renteria on her matter on November 17, 2022. ██████████ received a call from James in December 2022 and was told that more funds are available for the program and she is still waiting for that second check. Can someone contact her to keep her updated on her situation.

██████████:

██████████ has been waiting to get supportive services from the settlement since May 2022 and was told that rental assistance was not available for him. Last year ██████████ was told that perhaps it was best to transfer his file to the Pacoima WSC because, according to James, Proyecto del Barrio was out of funds. He was interested in becoming a truck driver or to work for Amazon Flex for deliveries but has not received any assistance or guidance to get him started on that. Proyecto del Barrio had him fill out an application for Cal works and was able to receive some help with rent through that program, but he was still unemployed and in desperate need of transportation because his car broke down last year. We emailed Ricardo Renteria on 11/17/22 to get an idea if we can expect ██████████ to receive any supportive services from Proyecto del Barrio WSC. Ricardo Renteria replied that James would reach out to ██████████ but that did not happen. ██████████ called the WSC himself and was finally able to speak to James in November 2022. ██████████ submitted, in person to James, an estimate of repairs he needs to fix his 18 wheeler truck for approximately

\$11k. James told [REDACTED] that his request has been submitted to the city for approval about weeks ago but has not heard from James since. During this time, without the support of the WSC [REDACTED] was actively looking for a job and reached out to company that has agreed to employ him and his brother driving a truck. He still needs to repair his own truck, to avoid borrowing the company's vehicle, which is why he made that request to the LARCA program. Do you know if his request has been submitted and when can he expect an update on that?

[REDACTED]: Received a \$4,000 check back in March of 2022 for housing. He was led to believe that he would receive a second check sometime in July of 2022 or when the new fiscal year funds were made available. Since April of 2022 [REDACTED] worked with James to start his business. In December 2022 [REDACTED] submitted an invoice for \$2,550 to repair his work truck as well a work laptop from Best Buy for \$3,466. The invoice for the truck repair was not paid by the WSC and [REDACTED] was forced to get a payment plan from the auto shop in order to avoid paying storage fees to the shop. He has been making payments to get his truck back. James told [REDACTED] that his request was already submitted to the city and that he is just waiting for approval. Will [REDACTED] get reimbursed for the payments he's made to the auto shop? And will funds be available for him to purchase the work laptop which he has requested for his business?

[REDACTED] Received a \$6,000 check in April of 2022. He was made to believe that there will be another check available to him. [REDACTED] submitted an IRS bill of taxes he owes and an invoice for car repairs to James Ellsworth. [REDACTED] has made several attempts to contact James but James does not return his calls. [REDACTED] as not been aware if his requests for support have been submitted for approval to the city. Can we expect someone to contact [REDACTED] and inform his of the status of his requests?

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--

Karina Henriquez  
Senior Project Assistant  
City of Los Angeles,  
Economic & Workforce Development Department  
1200 West 7th Street

Los Angeles, CA 90017  
Work cell: 213.663.3718

*"A leader sees GREATNESS in other people.  
She or He can't be much of a leader  
if all he or she sees are themselves"-Maya Angelou-*



**EXHIBIT HH**

## Ghirlandi Guidetti

---

**From:** Karina Henriquez <karina.henriquez@lacity.org>  
**Sent:** Wednesday, May 3, 2023 2:12 PM  
**To:** Jackie Chidiac  
**Cc:** Juan Romero; Ghirlandi Guidetti; Ash Rojo; Stephanie Carroll  
**Subject:** Re: Public Counsel re [REDACTED]

Good afternoon Jackie,  
Thank you for letting us know. We will look into the situation with [REDACTED] and get to a resolution. By any chance did she provide you with her contact information? I would like to reach out to her so that I may follow up with her case worker.

Take care.

On Wed, May 3, 2023 at 1:42 PM Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)> wrote:

Hello Karina and Juan,

We were recently contacted by a 62-year old class member [REDACTED] [REDACTED] Claim number: 80170981 [REDACTED]: [REDACTED] who is experiencing difficulties with her case worker. Originally her case worker was Jessica Espinoza who stopped returning her calls; she was then supposedly transferred to Jerry Velasquez but got no response from him and then was informed that Karen (last name unknown) is her new caseworker. Karen, in turn, told her she should be speaking to Jessica. Confidentially, although the situation is unclear, as we understand it, there might be a personal relationship of some sort between Ms. Espinoza and one of [REDACTED] [REDACTED] relatives which might be affecting the situation. In any event, [REDACTED] [REDACTED] in need of funds to pay for a teaching class and related text book (she has already paid for the book out of pocket). In addition she would like to participate in a mental health program and she is in need of a bus pass to get to classes. Can you please look into this situation and follow-up to let us know who the case worker is and their phone number so that the class member reach out to get the assistance she needs immediately.

Thank you.

Jackie

Jacqueline Chidiac

Senior Paralegal

PUBLIC COUNSEL

610 S. Ardmore Avenue

Los Angeles, CA 90005

T: 213 385-2977 x108

F: 213 201-4722

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--

Karina Henriquez  
Senior Project Assistant  
City of Los Angeles,  
Economic & Workforce Development Department  
1200 West 7th Street  
Los Angeles, CA 90017  
Work cell: 213.663.3718

*"A leader sees GREATNESS in other people.  
She or He can't be much of a leader  
if all he or she sees are themselves"-Maya Angelou-*

**EXHIBIT II**

## Ghirlandi Guidetti

---

**From:** Karina Henriquez <karina.henriquez@lacity.org>  
**Sent:** Monday, June 12, 2023 6:10 PM  
**To:** Ghirlandi Guidetti  
**Cc:** Juan Romero; Stephanie Carroll; Jackie Chidiac; Ash Rojo; Regina Mills; Scott Marcus; Gerardo Ruvalcaba  
**Subject:** Re: Rodriguez (CV11-01135): [REDACTED] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center

Good evening Ghirlandi,  
Hope you had a great weekend.

It was finally nice to see your face along with additional colleagues of yours I had not seen before.

Quick update on [REDACTED] acceptance letter.

I received the acceptance letter for [REDACTED]. I will contact [REDACTED] (her caregiver) tomorrow to explain to her the enrollment process and the forms I need her to sign and return to process [REDACTED] school tuition request.

Take care.

On Wed, Jun 7, 2023 at 9:51 AM Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)> wrote:

Thank you Ghirlandi,

I will submit the claims form to CAC today and request the acceptance letter for [REDACTED]. Once I receive the acceptance letter we will contact [REDACTED] and refer her to an agency that will help her process the tuition for [REDACTED] school.

Please list any unnecessary hurdles you see we need to address. We are always open to discuss improvements. We can set up a meeting sometime in the upcoming weeks and discuss those hurdles.

Below is the process our department follows. Once a class member is identified, we email them a claims form, assist with any questions they may have regarding the form and assist them further if needed. Once they submit the claims form, we then email it to CAC to request the acceptance letter. Once we receive the acceptance letter from CAC, I forward it to the class member and/or transferee along with the greeting message I shared with you a few weeks back.

<https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.gangcase.com%2Finfo.html%239&E=gguidetti%40publiccounsel.org&X=XID704bFmBky2655Xd1&T=PBCL&HV=U,E,X,T&H=2712c1a97818b75534e570327847ff4c2dc22985>

### 9. How do I apply for the job training program for myself or a relative?

Upon final approval of the settlement, a claim form will be mailed to you that you can fill out and return. Once your membership in the class is verified, a representative of the job training program will contact you or your relative to schedule an appointment for evaluation.

On Wed, Jun 7, 2023 at 7:30 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Karina – Attached is Mr. [REDACTED] signed claim form assigning his benefit to [REDACTED]. Please confirm you will contact [REDACTED] guardian and grandmother, [REDACTED], to assist her further. Her number is [REDACTED].

I fully appreciate all the work you do to assist class members in obtaining information and benefits. I also look forward to discussing with the city how we can improve program participation – and class members’ experiences with the program – by eliminating unnecessary hurdles to obtaining settlement benefits.

Best,

Ghirlandi

---

**From:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>  
**Sent:** Friday, June 2, 2023 12:45 PM  
**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>  
**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[scott.marcus@lacity.org](mailto:scott.marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>  
**Subject:** Re: Rodriguez (CV11-01135): [REDACTED] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center

Hello Ghirlandi,

I would gladly assist anyone, (as we have been) with filling out the claims form. Due to our agreement between your office and our department, your office agreed to be the intermediary when communicating with him. Please assist him with filling out a claims form and transferring his benefits to his daughter. Once we get his daughter's acceptance form with his claim number 92371616, we will make sure we refer her to an agency that will assist her in processing her tuition. We will communicate with [REDACTED] caretaker to collect any other requests she may have.

Take care.

On Fri, Jun 2, 2023 at 11:57 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Juan and Karina,

██████████ claim number is 92371616. Attached is his claim acceptance from CAC. He was served an injunction under the name ██████████. I found him on the roster on line 394 of the “master” tab in the “not on general list” workbook:

██████████	██████████	439 Union Drive, Los Angeles, CA 90017	BS 17002	Rockwood
------------	------------	--	----------	----------

Thank you for explaining that ██████████ claims were processed under ██████████ claim number and not his own. Unfortunately, ██████████ did not know that is what was happening and I’m not sure I understand why CAC accepted an assignment of benefits to someone who had already been approved for benefits.

In any event, can we please look into options for addressing this on the back-end so that ██████████ can claim benefits without ██████████ needing to do more paperwork? As you know, this process has been incredibly frustrating for him and I’d like to avoid creating additional frustration.

While I totally appreciate your position and that you Karina is suggesting we follow the process that was set up, one of the reasons that program participation has been so low is because of barriers like redundant administrative requirements. City Councilmembers Eunisses Hernandez and Tim McOsker highlighted the “unacceptably low participation rate” in their [March 7, 2023 Motion](#) to extend the settlement’s programs and recognized “recruitment flaws, lack of needed service delivery and resource options, service providers not understanding the population they are serving and poor retention efforts” as areas for improvement.

We urge the city to be more sensitive to class members’ difficulties with administrative processes, and to provide them accommodations to increase program participation rather than imposing barriers to it.

I’d welcome a call to discuss options to get ██████████ tuition benefits.

Thank you,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID704bFmBky2655Xd1&T=PBCL&HV=U,E,X,T&H=6125fe3dd60bcb641bfcea52eb094c1d78cfbd8e>

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**From:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>

**Sent:** Friday, May 26, 2023 12:55 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Regina Mills <[regina.mills@lacity.org](mailto:regina.mills@lacity.org)>; Scott Marcus <[scott.marcus@lacity.org](mailto:scott.marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>

**Subject:** Re: Rodriguez (CV11-01135): [REDACTED] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center

Hello,

The acceptance form [REDACTED] presented when he requested the benefits is the acceptance letter [REDACTED] had transferred to him with claim number 95049281. The claim number has already been registered on the State's system (CalJOBS) with his name. It cannot be duplicated or reassigned to someone else. If he had presented his own letter, the agency would have enrolled him using his own claim number.

If this is the case that he is a class member, he will need to fill out a claims form and transfer his benefits to his daughter. His daughter will be enrolled with his claim number.

I could not locate [REDACTED] on the class member rosters we have on file (attached). Please email me his confirmation letter. If not, once he fills out the claims form and transfers his benefits, the Claim Administrator will attach a copy of it.

On Fri, May 26, 2023 at 12:21 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Karina,

Upon additional investigation, CAC has confirmed that [REDACTED] benefits are not derived from [REDACTED] and he is a class member in his own right. Please see the attached confirmation email.



Accordingly, we ask again for your cooperation in assisting [REDACTED] – who is eligible for benefits through her mother, [REDACTED] – obtaining an education stipend to cover her high school tuition. Attached is evidence of her enrollment.

Please let me know what are the next steps to begin processing this claim.

Thank you,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>  
**Sent:** Friday, May 12, 2023 2:05 PM  
**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>  
**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>  
**Subject:** Re: Rodriguez (CV11-01135): [REDACTED] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center

Thank you Ghirlandi.

In looking at the acceptance letter addressed to [REDACTED], it looks like the claim number is the same as [REDACTED]. Once a class member transfers his/her benefits to a beneficiary and that beneficiary maximizes the settlement allocation, the benefits may not be transferred/accessed to or by another beneficiary. Class member [REDACTED], claim number 95049281 transferred the benefits to [REDACTED] and [REDACTED]. Since [REDACTED] accessed and exceeded the benefits, [REDACTED] becomes ineligible to receive the settlement benefits.

Below is a copy of the same claim number on both acceptance letters addressed to [REDACTED] and [REDACTED].

Would you please inform [REDACTED]? Please advise.

October 29, 2020

95049281

[REDACTED]  
[REDACTED]

LOS ANGELES, CA 90037

[REDACTED]

[REDACTED]

LOS ANGELES, CA 90037

March 16, 2020

95049281

[REDACTED]  
[REDACTED]

LOS ANGELES, CA 90037

[REDACTED]

[REDACTED]

LOS ANGELES, CA 90037

On Fri, May 12, 2023 at 1:28 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Thanks so much for the fast response, Karina!

Attached is [REDACTED] acceptance letter. Sorry I forgot to attach that before. You can reach [REDACTED] at [REDACTED]

Would it be possible to remind the agencies that they need to refer class members to you (and not just tell them the program is closed)? It is our understanding that the city council has extended the settlement and will be allocating additional funds, so we don't want folks to think they can no longer participate in the program. Also, could you please share with us the list of providers that still have funds/capacity to provide services? This information will help us direct clients to those providers.

Thanks again,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>

**Sent:** Friday, May 12, 2023 12:30 PM

**To:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>

**Cc:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>

**Subject:** Re: Rodriguez (CV11-01135): [REDACTED] & Denial of Benefits by Boyle Heights/East Los Angeles WorkSource Center

Good afternoon Ghirlandi,

Thank you for letting us know about this. We had instructed agencies that have exhausted their funding to refer all and any new class members wishing to enroll with them to Juan and I. We have been referring new class members to other agencies that have capacity. I will look into [REDACTED] case. Would you please share [REDACTED] contact information and the acceptance letter? I will need a copy of the acceptance letter in order to refer [REDACTED] to the appropriate agency. A few weeks back, when Stephanie brought [REDACTED] enrollment to our attention, I didn't find any records of enrollment for her.

Thanks again.

On Fri, May 12, 2023 at 11:26 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hello Karina and Juan,

I'm hoping you can help us support class member [REDACTED] with settlement benefits to pay her high school tuition, and investigate the improper denial of benefits to her by the Boyle Heights/East Los Angeles WorkSource Center.

[REDACTED] grandmother (and legal guardian), [REDACTED], recently contacted the WorkSource Center to request benefits for [REDACTED] and was told they are no longer enrolling class members. I thought the problem might be that the Worksource center didn't realize [REDACTED] had already been enrolled (i.e., before the 03/27/23 enrollment deadline), but [REDACTED] told them that [REDACTED] had the attached acceptance letter. The Worksource center told her that it didn't matter because the program had run out of money.

Can we please look into this? I am concerned about providers incorrectly turning away benefit-eligible class members.

With respect to [REDACTED], she is an incoming freshman at Bishop Conaty - Our Lady of Loretto, a Catholic girls' high school. The school's fees are \$8,825 per year. I've asked [REDACTED] to provide me with [REDACTED] enrollment paperwork and proof of fees – and I'll forward those to you as soon as I get them – but the school's fees are listed at [https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.bishopconatyloretto.org%2Fapps%2Fpages%2Findex.jsp%3FuREC\\_ID%3D82331%26type%3Dd%26pREC\\_ID%3D151847&E=gguidetti%40publiccounsel.org&X=XID704bFmBky2655Xd1&T=PBCL&HV=U,E,X,T&H=4a1edd5f6fd3ad041dd562637d34003441dcd27b](https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.bishopconatyloretto.org%2Fapps%2Fpages%2Findex.jsp%3FuREC_ID%3D82331%26type%3Dd%26pREC_ID%3D151847&E=gguidetti%40publiccounsel.org&X=XID704bFmBky2655Xd1&T=PBCL&HV=U,E,X,T&H=4a1edd5f6fd3ad041dd562637d34003441dcd27b). [REDACTED] is the daughter of another class member, so her desire to better herself through education and choose a different path than her father is exemplary of the pursuits the settlement is intended to support. We ask that you approve [REDACTED] for tuition benefits for all four years of high school.

I also wanted to flag that [REDACTED] previous benefits (a \$310 middle school tuition payment from 09/03/21, and reimbursement for educational supplies, including an iPad, on 07/06/21), appear to have been attributed to her father, [REDACTED] instead of directly to her.

Thank you in advance for your prompt attention to this important matter.

Sincerely,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

(213) 385-2977 x176

[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org) |

<https://clicktime.cloud.postoffice.net/clicktime.php?U=www.publiccounsel.org&E=gguidetti%40publiccounsel.org&X=XID704bFmBky2655Xd1&T=PBCL&HV=U,E,X,T&H=6125fe3dd60bcb641bfcea52eb094c1d78cfbd8e>

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--

Karina Henriquez

Senior Project Assistant

City of Los Angeles,  
Economic & Workforce Development Department

1200 West 7th Street

Los Angeles, CA 90017

Work cell: 213.663.3718

*"A leader sees GREATNESS in other people.*

*She or He can't be much of a leader*

*if all he or she sees are themselves"-Maya Angelou-*

--

Karina Henriquez

Senior Project Assistant

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**EXHIBIT JJ**

## Ghirlandi Guidetti

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**From:** Karina Henriquez <karina.henriquez@lacity.org>  
**Sent:** Friday, May 12, 2023 1:45 PM  
**To:** Ghirlandi Guidetti  
**Cc:** Juan Romero; Ash Rojo; Stephanie Carroll; Jackie Chidiac  
**Subject:** Re: Rodriguez: Housing Assistance  
**Attachments:** Revised LARCA Flyer 4-26-23.pdf

Thank you Ghirlandi for the reminder. I've attached the updated flier. My understanding is that the housing and rental was available only during the pandemic. It ceased last June 2022. All agency providers were informed as well as GRYD partners and other partner agencies we are partnered with.

Below is the list of agencies that have enrollment capacity at this time. We will update the greeting once funding becomes available.

Below is the confirmation email we send out to new class members when I email them their acceptance letters.

SUBJECT LINE: Confirmation of LARCA settlement program: CLASS MEMBER'S NAME AND/OR TRANSFEREE'S NAME

GREETING that includes each recipient's name:

Thank you for claiming the benefits of the LARCA settlement program. We've attached your acceptance letter for your records.

Under the settlement, you are eligible to access services related to **education, training and employment** (<https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.gangcase.com%2Finfo.html%2F36&E=gguidetti%40publiccounsel.org&X=XID878beLutu0930Xd3&T=PBCL&HV=U,E,X,T&H=ac75528fc28143468774a1a927e3908f93c1b509>).

Please note, some services may take up to 4-6 weeks to be processed and received. We will do our best to accommodate your request within a timely manner.

Below is a brief summary of the services and our department's website where you can find additional information about the services you are eligible to receive.

We've also attached a list of agencies that will assist you with accessing your benefits. Please choose an agency and contact them to get additional details on the enrollment process and accessing your benefits. You can also visit the gang case website for additional details of the settlement by visiting: <https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.gangcase.com%2F&E=gguidetti%40publiccounsel.org&X=XID878beLutu0930Xd3&T=PBCL&HV=U,E,X,T&H=64b4c2020e2df08e98cf01e8660e722ddaaf8629>

At this time these are the only (8) agencies enrolling participants into the program:

**SAN FERNANDO VALLEY**

- **Canoga Park/ South Valley WorkSource Center ResCare Workforce Services:** 21010 Vanowen Street, Canoga Park, CA 91303 / **818-596-4119 (Rosa Gonzalez)**
- **Pacoima/ North Valley WorkSource Center Goodwill Industries of Southern California:** 12502 Van Nuys Blvd. Pacoima , CA 91331 / **818-482-1754 (Yessica Sanchez)**

### WEST LOS ANGELES

- **West Los Angeles WorkSource Center Jewish Vocational Service:** 5446 Sepulveda Blvd., Culver City, 90230 / **310-309-6000 ext. 21 (Wyatt Gray)**

### HARBOR

- **Harbor Gateway WorkSource Center Pacific Gateway Workforce Investment Network:** 222 W. 6th Street # 410, San Pedro, CA 90731/ **562-570-4704 or 562-570-4721 (Wendy Calaycay or Carla Anguiano)**

### SOUTH LOS ANGELES

- **South LA WorkSource Center UAW-Labor Employment and Training Corporation:** 6109 S. Western Ave., Los Angeles, CA 90047/ **323-730-7900 Marie Lee (appointments)**

### Watts/LA WorkSource Center

- **Housing Authority City of LA:** 2220 E. 114th Street, Los Angeles, CA 90059/ **323-249-7751 (Jasmine Houston)**
- **West Adams WorkSource Center -Asian American Drug Abuse Program, Inc.:** 2900 Crenshaw Blvd., Los Angeles, CA 90016/ **323-293-6284**

### EAST LOS ANGELES

- **Northeast LA WorkSource Center Goodwill Industries of Southern California:** 342 N. San Fernando Road, Los Angeles, CA 90031/ **323-539-2182 (Yessica Sanchez)**

If you have any other questions regarding the program please email us back at this email. Thanks again.

Services are currently available through 22 contracted job assistance centers from the WorkSource Center System

- Employment and Educational Services
- Up to \$1,000 in Training and Education Stipends
- Tattoo Removal Services
- 325 hours of work experience (\$20p/h)
- Career Counseling
- Vocational Training and Education
- Support Services
- Pre-Employment and Money Management Skills Training

<https://clicktime.cloud.postoffice.net/clicktime.php?U=https%3A%2F%2Fwww.dla.com%2Findex.php%2Femployment-services%2Fgang-injunction->

[settlement&E=gguidetti%40publiccounsel.org&X=XID878beLutu0930Xd3&T=PBCL&HV=U,E,X,T&H=69ae9dc08897877c0ede700caf4e9162cd2f8093](mailto:gguidetti%40publiccounsel.org&X=XID878beLutu0930Xd3&T=PBCL&HV=U,E,X,T&H=69ae9dc08897877c0ede700caf4e9162cd2f8093)

END OF MESSAGE.

On Fri, May 12, 2023 at 1:29 PM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Karina,

Bumping up the email below from when you were out of the office on Monday. We have had some class members asking us about this and want to be sure we have the correct information.

Thanks,

**Ghirlandi Guidetti**

(213) 385-2977 x176

---

**From:** Ghirlandi Guidetti

**Sent:** Monday, May 8, 2023 3:27 PM

**To:** 'Karina Henriquez' <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Cc:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Jackie Chidiac <[jchidiac@publiccounsel.org](mailto:jchidiac@publiccounsel.org)>

**Subject:** Rodriguez: Housing Assistance

Dear Juan and Karina,

I'm writing to introduce myself as a new member of the *Rodriguez* team here at Public Counsel. I'll be assisting class members with requests to LARCA, and I look forward to working with you both.

Steph asked me to write to you both because, in a recent email relating to a class member, Karina stated that housing assistance was no longer being given. We had not understood this to be the case and the current flyer still lists housing assistance as a benefit that is available. Is there a written policy or any other guidance we can review so that we are able to explain to class members how housing assistance works? If it is a matter of policy to no longer provide rental assistance please let us know when that policy was adopted.

Thank you in advance,

**Ghirlandi Guidetti** (he/him/his)

Staff Attorney

Consumer Rights and Economic Justice

**Public Counsel**

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--

Karina Henriquez  
Senior Project Assistant  
City of Los Angeles,  
Economic & Workforce Development Department  
1200 West 7th Street  
Los Angeles, CA 90017  
Work cell: 213.663.3718

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**EXHIBIT KK**



**McMahon, Robert**

---

**From:** Stephanie Carroll <scarroll@publiccounsel.org>  
**Sent:** Monday, May 9, 2022 2:31 PM  
**To:** Scott Marcus  
**Cc:** Megan Vees; Lupe Sanchez; Cindy Panuco; Dan Stormer (dstormer@hadsellstormer.com); [ ORANGE ] (oluorange@att.net)  
**Subject:** Meeting needed to discuss settlement expenditures  
**Attachments:** Rodriguez\_LARCA 2.0- Participant Expenditure Report- 04162022 (1).pdf; Settlement Agreement with Exhibits (002).pdf

Dear Scott,

I write to request a meeting to discuss expenditure under the Rodriguez settlement.

Last week we met with Ricardo as part of our ongoing monitoring efforts. During the meeting we reviewed the recently-provided budget breakdown by class member (attached). Ricardo described “support services” given to class members as including rental and utilities assistance, neither of which were envisaged by, nor are included in, the settlement agreement (also attached). We had heard from class members that some folks had received covid rental assistance but had assumed that was a benefit available to all WorkSource clients, not limited to class members. Ricardo said this benefit was only for class members and that he had gotten agreement from the “management team” to offer this help. Plaintiffs’ counsel were not included in any discussion of this.

Given that, by our analysis of the budget data, only around 340 class members have received substantive training and education benefits thus far under the settlement, and that providing rental and utilities assistance is a concrete and direct benefit to class members, we think it would make sense to modify the settlement agreement further to allow for such assistance and ensure all class members can get equal access to it. What do you think?

On a related matter, we have asked Ricardo for a copy of the attached budget breakdown in excel so we can do more analysis and for a breakdown of support services so we can see what has been spent on things envisaged by the settlement and what has been spent on other assistance such as rental and utilities help.

We can make ourselves available to meet and confer at various points this week – please let us know what is a good time for you and who else needs to be included in the meeting.

Best,

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

**EXHIBIT LL**

## McMahon, Robert

**From:** Stephanie Carroll <scarroll@publiccounsel.org>  
**Sent:** Monday, August 15, 2022 5:19 PM  
**To:** Scott Marcus; Regina Mills  
**Cc:** Gerardo Ruvalcaba; Ricardo Renteria; Olu Orange; Megan Vees; Lupe Sanchez; Cindy Panuco; Dan Stormer (dstormer@hadsellstormer.com)  
**Subject:** Rodriguez: Matters for Rule 7-3 Meet & Confer  
**Attachments:** Rodriguez v City of LA expenditure data analysis for Aug 18 22 mtg.pptx; Rodriguez\_LARCA 2.0- Participant Expenditure Report- 04162022 (1) (002).pdf

Dear Scott,

These following are the issues we would like to discuss and resolve at our meet and confer meeting pursuant to Local Rule 7-3, on August 18 at 3:30 p.m.

### 1. Equal notice and availability of Covid rent/utilities relief for all class members.

As counsel for class members, we have an obligation to make sure that all class members have sufficient notice about the benefits/relief secured or offered through the settlement. We appreciate that the City assessed class members for their needs during COVID and provided them with rental/utilities relief where appropriate. However, the City unilaterally made the decision to extend additional benefits. Further, although rental/utilities relief eligibility may have been assessed by case managers for those class members who were enrolled, the fact remains that it was never explicitly identified as an approved benefit under the settlement and so most class members had no notice of its availability. Further, on examining the "Support Services" CALJOBS codes detailed in Worksource center directives, there are codes for other expenses not covered by the settlement, including "Medical" and "Child/dependent care" which we need more information on.

As class counsel, we have an obligation to ensure that all class members have the required notice of benefits and to make sure that all class members who fit the criteria (whatever the City is using) are able to apply for those benefits. We want to explore what process the City used for determining which class members got any benefit not envisaged by the settlement, in what amount, to whom those payments were made, and during what period payments have been made. With reference to rental assistance, we would also like to explore whether assistance was also offered to homeowners in default on their mortgage/property tax? With that information, we are hoping to agree on providing notice to the entire class, the contours of the benefits to be offered, and the procedure for claiming the benefit.

### 2. Delays in accessing Services and reimbursements.

Class members have been experiencing severe delays both in getting started with services in the first instance, and with reimbursements related to education and training expenses and related equipment and materials. These problems keeps surfacing despite escalations with City staff and assurances that the situation will improve. Aside of the harms to individuals this causes, it also discourages class members from seeking services. The examples below are just a sample of the issues we have seen and escalated with the City.

- [REDACTED] had a first meeting with the Worksource center in Canoga Park in the first week on January 2022; his original case manager Rosa told him he would receive an email from her, which never materialized, and his calls went unanswered for months; when he finally got hold of her, Rosa told him she was very busy, that [REDACTED] was not the only person in the program, and that he would have to wait. [REDACTED] eventually requested transfer to El Proyecto Del Barrio in March, where he registered with case manager Alex, who similarly did not follow up with him. When [REDACTED] called after a month he was redirected to James who told him he needed to apply again, which [REDACTED] did (in mid-April). After that, he received a call from Alex saying he could start requesting services. [REDACTED] requested help with tools and materials to build his business as an

electrician. After some back and forth, [REDACTED] put in a written request for specific tools on May 10, 2022. Alex made [REDACTED] rework the email 3 times before he said it was good enough to send to the City for approval (on May 20). Alex then told [REDACTED] he would need to wait 4-6 weeks for the request to be processed. When [REDACTED] called back after 6 weeks, Alex told him he needed to wait another 6 weeks because the center did not have enough funds to accommodate his request. When [REDACTED] contacted Ricardo Renteria, Ricardo confirmed the same information directly to [REDACTED]: the city was out of money and he needed to wait. During this conversation, [REDACTED] asked if he could be considered for educational as well as supportive services and was told by Ricardo that he could not: [REDACTED] said that he would continue with the supportive services. After waiting another two weeks, [REDACTED] contacted Ricardo again who told him his request had been put on hold because the City wasn't sure if [REDACTED] was pursuing education or supportive services and told [REDACTED] that he needed to put in writing that he wasn't interested in educational services. Ricardo then told [REDACTED] that was transferring him to another Worksource center, Canoga Park, which did have funds. [REDACTED] told him he was not comfortable with that given his past experience, and Ricardo ignored him and transferred him back to Canoga Park regardless. [REDACTED] had submitted receipts to "James" for tools amounting to \$1,342.67; on August 4, 2022 he picked up a check in the amount of \$900 and has been given no explanation for the shortfall.

- [REDACTED] was approved on April 11, 2022; with Plaintiffs' counsel's assistance he finally get connected with someone about accessing services on July 20, 2022, over three months later.
- [REDACTED] initially reached out to Plaintiffs' counsel on or around May 3, 2022 because he had not heard back about the status of a reimbursement claim since April 13, 2022. We have emailed Ricardo several times about this person and his request to be reimbursed for a computer, including on June 28 and July 22, and have still not received a complete response.
- [REDACTED]: [REDACTED] sent an email in September 2021 attaching proof of a student loan, textbook receipts and proof of an additional tuition payment which she had paid by borrowing \$3,500 from her uncle. After some initial back and forth with her case manager, Guadalupe, [REDACTED] provided transcripts and other additional verifications as requested. [REDACTED] responded to further questions and then heard nothing despite sending follow up emails on September 30, October 14 and December 21, 2021. On December 30 Guadalupe responded to say that LARCA was out of funding for supportive services. We raised this issue with the City on January 10, 2022, but it was not until mid-February that any payments were released to [REDACTED]. By that time, [REDACTED] had again advanced tuition payments for the new semester.

Please note, we brought up the problem of Worksource centers stating they were out of money at the end of last year when the issue came to our attention from several sources. At that time, we were told that it was a one-off issue because the City had to approve higher allocations; we were assured that there would be no such problems moving forward – clearly that is not the case. We have also made plain that class members should not need to get reimbursed – Worksource centers should be paying for tuition etc. directly. From our point of view the City chose to implement the settlement through its network of Worksource centers, and our class members should not be held hostage to any of the City's own bureaucratic processes which are causing severe and unwarranted delays, both in getting signed up to receive services, and also in receiving reimbursements.

### **3. The discrepancy between class member numbers and those receiving meaningful services to date.**

We would like to share with you our analysis of the data recently provided by the City and discuss what can be done to increase both enrollments and the delivery of meaningful services to class members (see attached PowerPoint). On April 20, 2022, Ricardo provided a pdf expenditure report by WorkSource Center and by individual class member which was broken down into the categories of expenditure below (also attached); after several requests, an excel spreadsheet version of the data was eventually provided on June 6, 2022; although requested of Ricardo at our meeting on May 4, 2022, we have not be provided with data that breaks down "Supportive Service" payments into those envisaged by the settlement (i.e. jobs and education related) and those that were not (rental relief etc.).

We labelled some services as Tier 1 as they related directly to the provision of jobs and education:

- Outreach, Enrollment, Evaluation & Assessment;
- Case Management Sessions & Support Activity;

- Career Services and Employment Readiness Workshops;
- Education and Vocational Training; (Tier 1)
- Education and Vocational Training Stipends; (Tier 1)
- Transitional Employment Wages and Fees; (Tier 1)
- Job Placement and Follow Up Services; (Tier 1)
- Support Services; and
- Tattoo Removal

We counted all Tier 1 services, plus “Career Services and Employment Readiness Workshops”, “Support Services” and “Tattoo Removal” as meaningful services with a tangible benefit. Anyone who only received “Outreach, Enrollment, Evaluation, & Assessment” and/or “Case Management Sessions & Support Activity” without any other benefit are not included as having received a meaningful/tangible benefit. Based on our analysis, only 688 out of the 845 people signed up for services as shown by Ricardo’s report - out of a potential class pool of 5,606 class members - have received any kind of meaningful or tangible benefit from the settlement. Our estimates are generous as they include a number of people who got less than \$100 in supportive services and no Tier 1 service. Indeed, most who signed up for services received none of the benefits we identified as Tier 1, and only 17 class members have benefited from tattoo removal.

We would also like to explore some of the clear disparities in service provided by the various Work source centers. From the data Ricardo provided, for example, we can see that HACLA-Watts Worksource Center has clearly served a lot of people according to the original settlement and in a meaningful way; other Worksource centers, such as West Adams Worksource Center and Boyle Heights Worksource Center, appear to have provided little in terms of jobs placement and education. These disparities are troubling, and give Plaintiffs little confidence that all case managers followed the same processes and procedures in dealing with class members, which in turn calls into question the even-handedness with which rental utility relief was provided.

#### **4. Mandatory requirements imposed on class members not required by the settlement.**

It is apparent that class members have been subjected to requirements – for example, undergoing compulsory English and math testing that is not required and should never have been required to access benefits. We discussed this issue at length during our meeting on December 19, 2019, and were given assurances that this practiced had ceased. Despite that, since then, we have heard from class members that they were required to take these tests, including [REDACTED] and [REDACTED] both of which we brought to the City’s attention. In addition, and according to the most recent LARCA Directive 21-15, providers are instructed that “Financial Literacy Education” is mandatory - again, there is no such requirement under the settlement and, like the administration of assessment tests discussed previously, such patronizing requirements have a chilling effect on class member participation in the jobs and education program.

#### **5. Responsiveness of the City and CAC**

On several occasions the City has been very slow in replying to letters or emails raising concerns. Most recently for example, I wrote to Ricardo and Gerardo on July 22, 2022 related to issues with caseworker Alejandro Morales and have yet to receive a response. In terms of CAC, we have requested multiple times that they send monthly reports on enrollment progress but have had to constantly remind CAC to send reports; the last report we received was in through February 2022.

#### **6. Monitor reports**

We would like to get clarity on when future Monitor report(s) is/are due. In your email dated 6/16/22 you stated that you anticipated an evaluation report “in the next month or so”; however, in our discussions with Dr. Malka, he stated: “The next report will not come out for a while...it will likely be the final program evaluation report next year. If there is another flash report, it may be near the end of the year.”

Looking forward to meeting on these issues.

Steph

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

**EXHIBIT MM**

## Ghirlandi Guidetti

---

**From:** Stephanie Carroll  
**Sent:** Thursday, May 4, 2023 11:35 AM  
**To:** Ghirlandi Guidetti  
**Subject:** FW: Housing assistance

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**From:** Erika Luna <eluna@publiccounsel.org>  
**Sent:** Monday, May 1, 2023 12:23 PM  
**To:** Juan Romero <juan.romero@lacity.org>; Karina Henriquez <karina.henriquez@lacity.org>  
**Cc:** Jackie Chidiac <jchidiac@publiccounsel.org>; Stephanie Carroll <scarroll@publiccounsel.org>; Ash Rojo <arojo@publiccounsel.org>  
**Subject:** Housing assistance

Hi Juan and Karina,

We are writing to you on behalf of [REDACTED] who has been receiving benefits from the Pacoima Goodwill WSC and says his case manager at this moment is Olin Chavez. [REDACTED] works full time as a machine operator, he goes to school part time but is also homeless. He requested housing assistance and support from the LARCA program and was denied. He said that Olin and you (Karina) told him that housing assistance was no longer available for class members through the LARCA program and that if he paid for a hotel to spend the night or for however long he need to, that he will have to pay out of pocket and then request reimbursement for it. He called us because he feels that he is being treated differently since he knows other members are receiving housing assistance through the program. He pointed out that housing assistance is noted on the flyer as part of the benefits available to class members. He is in urgent need of a stable place to stay every night to be well rested, do homework, keep his belongings safe and take care of all personal needs. Can you please look into this matter and see if there is anything that can be done to assist him?

On your reply please be sure to include my entire team copied here since I will be out of the office starting tomorrow. Thank You.

Best,

Erika



**EXHIBIT NN**

OFFICERS OF THE BOARD  
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Founder



The nation's largest pro bono law firm

July 21, 2023

**Via Email Only**

Juan Romero  
LARCA Program  
Sr. Project Coordinator  
Economic and Workforce Development Department  
1200 W. 7th St, 6th floor  
Los Angeles, CA 90017  
[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

**Re: Denial of *Rodriguez* Class Members to Access to WIOA Benefits (WDS Directive 23-01); and Supportive Services/Needs-Related Payments Policy.**

Dear Juan,

As you know, we recently inquired about whether *Rodriguez* class members are being denied access to any EWDD programs or services because they are receiving LARCA 2.0 benefits under the settlement.

In response to our inquiry Ms. Henriquez explained that there is a “policy that addresses dual-enrollment, which is not encouraged” and provided us an EWDD memo dated September 19, 2022 to Los Angeles Reconnections Career Academy (LARCA) 2.0 Providers (WDS Directive 23-01) (the “Memo”). We had not previously received this memo, which is ten months old.

We are concerned that the Memo forbids *Rodriguez* class members from being “co-enrolled into the City’s WIOA [City of Los Angeles Workforce Innovation and Opportunity Act] programs [and] other special grant-funded programs without the express written pre-authorization of the City.” (emphasis in original). Notably, the memo says nothing about how class members who wish to participate in WIOA or other programs after receiving LARCA 2.0 benefits can obtain city authorization.<sup>1</sup>

<sup>1</sup> The Memo does provide guidance for securing approval for the “co-enrollment” of *Rodriguez* class members who were “already in the CalJOBS system.”

We would like to make sure everyone understands that *Rodriguez* settlement benefits (i.e., LARCA 2.0 benefits) are court-ordered entitlements, not discretionary benefits. As such, it is not appropriate to discourage, much less prevent class members' access to other city programs and services because of their participation in LARCA 2.0.

We ask that EWDD immediately rescind the Memo and take steps to ensure that LARCA 2.0 providers understand that class members should not be denied participation in any EWDD programs solely because they have received settlement benefits. We also encourage you to work with the providers to notify any class members who were or may have been denied City benefits under the policy that there was an error.

Relatedly, class counsel is frustrated to again find ourselves not having been timely provided with information (i.e., the Memo) that has ramifications for the administration of the settlement. We are concerned that there may be other policies or practices that are harmful to the administration of the settlement or to the class. For this reason, we ask that you provide us with copies of all policies relevant to LARCA 2.0.

To the extent that you are unwilling to provide us these records in our capacity as Rodriguez class counsel, we hereby request the records pursuant to the California Public Records Act (PRA), Cal. Gov't Code § 7920.000, et seq.

Please respond to this letter in writing by no later than August 4, 2023 to confirm the Memo has been rescinded and explain the specific steps you are taking to identify and contact impacted class members. Your response should also indicate when we can expect all other LARCA 2.0 policies, which, consistent with the PRA, must be provided promptly. Cal. Gov't Code § 7922.530.

We also wanted to seek clarification about the "Supportive Services/Needs-Related Payments Policy" (effective July 1, 2023) (the "Policy") that you provided us on July 14 in response to our request for EWDD's policies for considering any benefits beyond jobs and education programs that have been provided to any class member (e.g., housing assistance, bail, etc.).

The Policy states that it is about WIOA activities. We understand this to mean that it is about city or EWDD services *other than* LARCA 2.0 settlement benefits. Accordingly, the Policy is not responsive to our request for policies about how class members can get benefits under LARCA 2.0 other than jobs and education programs.

Moreover – like the Memo discussed above – the Policy is inappropriate as applied to class members because it limits supportive services to "customers who cannot obtain supportive services through other programs or partner agencies providing such services." We understand this requirement for WIOA services, but we should not be limiting support services through LARCA 2.0 to class members in this way because the settlement is an entitlement.

Please let us know if our understanding of the Policy is correct and, if so, confirm that it will be clarified so that WorkSource centers do not rely on it when class members ask for support services in connection with requests for settlement benefits.

We would also appreciate your confirmation that EWDD does not have a written policy for considering benefits beyond jobs and education programs under LARCA 2.0. If there is such a policy, please provide it to us. If there is not, we urge you to develop one.

Sincerely,

***Ghirlandi Guidetti***

Ghirlandi Guidetti (he/him/his)  
Staff Attorney, Consumer Rights and Economic Justice  
Public Counsel  
(213) 385-2977 x176 | [gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)

Cc: Scott Marcus ([Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)); Karina Henriquez ([karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org));  
Carolyn M. Hull ([Carolyn.Hull@lacity.org](mailto:Carolyn.Hull@lacity.org))

**EXHIBIT OO**

# CITY OF LOS ANGELES

#.15574  
CALIFORNIA

CAROLYN M. HULL  
GENERAL MANAGER



KAREN BASS  
MAYOR

**ECONOMIC AND WORKFORCE  
DEVELOPMENT DEPARTMENT**

1200 W. 7<sup>TH</sup> STREET  
LOS ANGELES, CA 90017

August 4, 2023

Ghirlandi Guidetti  
Staff Attorney  
Consumer Rights and Economic Justice Public Counsel  
610 S. Ardmore Ave.  
Los Angeles, CA 90005

**SUBJECT: RESPONSE RE: DENIAL OF RODRIGUEZ CLASS MEMBERS TO  
ACCESS TO WIOA BENEFITS (WDS DIRECTIVE 23-01); AND  
SUPPORTIVE SERVICES/NEEDS – RELATED PAYMENTS POLICY**

Dear Mr. Guidetti:

The following is the Economic and Workforce Development Department's (EWDD) response to issues raised in your memo dated on July 21, 2023.

**Issue No.1:**

*We are concerned that the Memo [WDS Directive 23-01 or Directive] forbids Rodriguez class members from being "co-enrolled into the City's WIOA [City of Los Angeles Workforce Innovation and Opportunity Act] programs [and] other special grant- funded programs without the express written pre-authorization of the City." (emphasis in original). Notably, the memo says nothing about how class members who wish to participate in WIOA or other programs after receiving LARCA 2.0 benefits can obtain city authorization.<sup>1</sup>*

**EWDD Response:**

As noted in the above emphasized statement, **the directive cited does not prohibit co-enrollment into City of LA workforce development programs** The policy requires EWDD pre-authorization to avoid duplication of services and to determine grant eligibility. The specific language included in the Directive is as follows:

"As the source of monies for LARCA 2.0 are City General Purpose funds, participants are **NOT** to be co-enrolled into the City's WIOA programs nor other special grant-funded programs without the express written pre-authorization of the City. However, if the participant is already receiving services through a City-funded grant, such as the LA:RISE or WIOA Programs, that participant is still eligible to receive additional services through this program."

Denial of Rodriguez Class Members

This language is typically included in our contracts and/or directives to ensure that co-enrollments are reasonable and eligible under different funding sources.

As the grant administrators for the WIOA program, it is our responsibility to ensure that participants meet program requirements and that costs charged against the grant are 1) eligible, 2) allocable and 3) reasonable. Therefore, we reserve the right to review all requests for co-enrollment to determine appropriateness.

**Issue No. 2:**

*Relatedly, class counsel is frustrated to again find ourselves not having been timely provided with information (i.e., the Memo) that has ramifications for the administration of the settlement.*

**EWDD Response:**

The language regarding pre-authorization for co-enrollment has been included in six different versions of LARCA directives issued by EWDD since the inception of the program. Please see the following directives for the above-referenced pre-authorization language:

- Directive: 17-18 Issued 06/19/2017
- Directive: 18-06 Issued 09/15/2017
- Directive: 18-14 Issued 01/24/2018
- Directive: 19-07 Issued 10/24/2018
- Directive: 20-02 Issued 08/07/2019
- Directive: 23-01 Issued 09/19/2022

**Issue No. 3:**

*We would like to make sure everyone understands that Rodriguez settlement benefits (i.e., LARCA 2.0 benefits) are court-ordered entitlements, not discretionary benefits.": As such, it is not appropriate to discourage, much less prevent class members' access to other city programs and services because of their participation in LARCA 2.0.*

*We ask that EWDD immediately rescind the Memo and take steps to ensure that LARCA 2.0 providers understand that class members should not be denied participation in any EWDD programs solely because they have received settlement benefits. We also encourage you to work with the providers to notify any class members who were or may have been denied City benefits under the policy that there was an error.*

**EWDD Response:**

As stated previously, the Directive does not prohibit LARCA members from co-enrolling into other EWDD funded programs outside of LARCA 2.0. WorkSource Centers do not deny services to anyone that meets eligibility criteria and is in need of services.

As the grant administrators for WIOA and related workforce funding, we reserve the right to review all requests for co-enrollment based on the criteria stated above. Thus, we decline to rescind the Directive.

Response:

Page 3 of 36

August 4, 2023

Denial of Rodriguez Class Members

**Issue No. 4:**

*We are concerned that there may be other policies or practices that are harmful to the administration of the settlement or to the class. For this reason, we ask that you provide us with copies of all policies relevant to LARCA 2.0. To the extent that you are unwilling to provide us these records in our capacity as Rodriguez class counsel, we hereby request the records pursuant to the California Public Records Act (PRA), Cal. Gov't Code § 7920.000, et seq.*

*Please respond to this letter in writing by no later than August 4, 2023 to confirm the Memo has been rescinded and explain the specific steps you are taking to identify and contact impacted class members. Your response should also indicate when we can expect all other LARCA 2.0 policies, which, consistent with the PRA, must be provided promptly. Cal. Gov't Code § 7922.530.*

**EWDD Response:**

Workforce Development Policies are public records reviewed and approved by the Los Angeles Workforce Development Board and Los Angeles City Council annually. Adopted policies may be found, at the public website:

[https://ewddlacity.com/images/reports/ap24/APy24-Policies\\_draft2.pdf](https://ewddlacity.com/images/reports/ap24/APy24-Policies_draft2.pdf).

EWDD can provide printed copies of the adopted Workforce Development Policies upon request.

We hope that the above responses provide additional clarity to the issues raised. Please feel free to reach out to me directly if you would like to discuss further.

Sincerely,



GERARDO RUVALCABA  
Assistant General Manager

GR:DB:JR:KH:cg



**EXHIBIT PP-1**

**MONTHLY DATA CHANGES (average/month rounded to nearest whole)**

		4	2	2	2	
		Jan --> Mar 21	Mar --> Jul 21	Jul --> Aug 21	Aug --> Oct 21	Oct --> Dec 21
<b>Total Claims Processed between reports</b>	<b>Net Change</b>	<b>+84</b>	<b>+163</b>	<b>+27</b>	<b>+16</b>	<b>+14</b>
Average Change/Month	Average/Month	+42	+41	+27	+15	+7
<b>Total Claims Not Processed between reports</b>	<b>Net Change</b>	<b>+1</b>	<b>-2</b>	<b>+1</b>	<b>0</b>	<b>0</b>
Average Change/Month	Average/Month	+1	-1	+1	0	0
<b>Total Claims Received between reports</b>	<b>Net Change</b>		<b>+161</b>	<b>+28</b>	<b>+16</b>	<b>+14</b>
Average Change/Month	Average/Month		+40	+28	+15	+7
<b>Total Valid Claims between reports</b>	<b>Net Change</b>	<b>+85</b>	<b>+164</b>	<b>+27</b>	<b>+16</b>	<b>+15</b>
Average Change/Month	Average/Month					
<b>Not Eligible Claims between reports</b>	<b>Net Change</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Average Change/Month	Average/Month	0	0	0	0	0
<b>Multiple Deficiencies between reports</b>	<b>Net Change</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Average Change/Month	Average/Month	0	0	0	0	0
<b>Removal Form Not Provided/Incomplete</b>	<b>Net Change</b>	<b>0</b>	<b>-1</b>	<b>0</b>	<b>0</b>	<b>0</b>
Average Change/Month	Average/Month	0	0	0	0	0
<b>No Signature between reports</b>	<b>Net Change</b>	<b>-1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-1</b>
Average Change/Month	Average/Month	0	0	0	0	0

**MONTHLY DATA CHANGES**

	2	6	5	5	2			
	Dec 21 --> Feb 22	Feb --> Aug 22	Aug 22 --> Jan 23	Jan --> Jul 23	Jul --> August 23	Aug --> Sept 23	Sept --> Oct 23	Oct --> Nov 23
<b>Total Claims Processed between reports</b>	+39	+128	+44	+63	+21	+17	+20	+24
Average Change/Month	+13	+23	+9	+11	+21	+14	+30	+18
<b>Total Claims Not Processed between reports</b>	0	+73	-1	+2	-1	+1	-2	0
Average Change/Month	0	+13	-0	+0	-1	+1	-3	0
<b>Total Claims Received between reports</b>	+39	+201	+43	+65	+20	+18	+18	+24
Average Change/Month	+13	+36	+9	+12	+20	+14	+27	+18
<b>Total Valid Claims between reports</b>	+39	+128	+44	+64	+21	+17	+21	+24
Average Change/Month						+14	+32	+18
<b>Not Eligible Claims between reports</b>	0	0	0	0	0	0	0	0
Average Change/Month	0	0	0	0	0	0	0	0
<b>Multiple Deficiencies between reports</b>	0	0	0	0	0	0	0	0
Average Change/Month	0	0	0	0	0	0	0	0
<b>Removal Form Not Provided/Incomplete</b>	0	-1	0	0	0	0	0	0
Average Change/Month	0	0	0	0	0	0	0	0
<b>No Signature between reports</b>	0	+1	0	-1	0	0	-1	0
Average Change/Month	0	0	0	0	0	0	-2	0

**MONTHLY DATA CHANGES**

	<b>Nov --&gt; Dec 23</b>
<b>Total Claims Processed between reports</b>	<b>+18</b>
Average Change/Month	+15
<b>Total Claims Not Processed between reports</b>	<b>0</b>
Average Change/Month	0
<b>Total Claims Received between reports</b>	<b>+18</b>
Average Change/Month	+15
<b>Total Valid Claims between reports</b>	<b>+18</b>
Average Change/Month	+15
<b>Not Eligible Claims between reports</b>	<b>0</b>
Average Change/Month	0
<b>Multiple Deficiencies between reports</b>	<b>0</b>
Average Change/Month	0
<b>Removal Form Not Provided/Incomplete</b>	<b>0</b>
Average Change/Month	0
<b>No Signature between reports</b>	<b>0</b>
Average Change/Month	0

RAW DATA

Report Date:	3/31/2021	7/31/2021	8/31/2021	10/1/2021	12/1/2021	2/28/2022	8/19/2022	1/17/2023	7/7/2023	8/7/2023	9/15/2023	10/6/2023	11/14/2023	12/20/2023
<b>Total Claims Processed</b>	<b>1201</b>	<b>1364</b>	<b>1391</b>	<b>1407</b>	<b>1421</b>	<b>1460</b>	<b>1588</b>	<b>1632</b>	<b>1695</b>	<b>1716</b>	<b>1733</b>	<b>1,753</b>	<b>1,777</b>	<b>1795</b>
<b>Total Claims Not Processed</b>	<b>6</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>78</b>	<b>77</b>	<b>79</b>	<b>78</b>	<b>79</b>	<b>77</b>	<b>77</b>	<b>77</b>
<b>Total Claims Received</b>	<b>1207</b>	<b>1368</b>	<b>1396</b>	<b>1412</b>	<b>1426</b>	<b>1465</b>	<b>1666</b>	<b>1709</b>	<b>1774</b>	<b>1794</b>	<b>1812</b>	<b>1,830</b>	<b>1,854</b>	<b>1872</b>
<b>Valid Claims</b>	<b>1148</b>	<b>1312</b>	<b>1339</b>	<b>1355</b>	<b>1370</b>	<b>1409</b>	<b>1537</b>	<b>1581</b>	<b>1645</b>	<b>1666</b>	<b>1683</b>	<b>1,704</b>	<b>1,728</b>	<b>1746</b>
Requested job training	1026	1175	1205	1220	1236	1274	1397	1440	1501	1522	1539	1,559	1,582	1600
Requested tattoo removal	339	368	376	379	382	383	404	411	426	432	433	439	440	442
Requested Removal from Gang Injunction	629	610	603	603	600	600	592	589	581	580	580	579	578	575
Transfer Job Training to Relative	260	319	331	336	339	351	392	407	441	449	456	466	478	486
<b>Not Eligible Claims</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>
Requested job training	23	23	23	23	23	23	23	23	23	23	23	23	23	23
Requested tattoo removal	11	11	11	11	11	11	11	11	11	11	11	11	11	11
Requested Removal from Gang Injunction	24	24	24	24	24	24	24	24	24	24	24	24	24	24
Transfer Job Training to Relative	4	4	4	4	4	4	4	4	4	4	4	4	4	4
<b>Multiple Deficiencies</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>
Requested job training	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Requested tattoo removal	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Requested Removal from Gang Injunction	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Transfer Job Training to Relative	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Removal form not provided/incomplete</b>	<b>9</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>7</b>
Requested job training	9	8	8	8	8	8	7	7	7	7	7	7	7	7
Requested tattoo removal	4	4	4	4	4	4	4	4	4	4	4	4	4	4
Requested Removal from Gang Injunction	9	8	8	8	8	8	7	7	7	7	7	7	7	7
Transfer Job Training to Relative	1	1	1	1	1	1	1	1	1	1	1	1	1	1
<b>No signature</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>17</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>17</b>	<b>17</b>	<b>16</b>	<b>16</b>	<b>16</b>
Requested job training	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Requested tattoo removal	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Requested Removal from Gang Injunction	2	2	2	2	1	1	1	1	1	1	1	1	1	1
Transfer Job Training to Relative	1	1	1	1	1	1	1	1	1	1	1	1	1	1

**EXHIBIT PP-2**



## City of LA

Status Report as of January 17, 2023

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	66	1.072%
ACPO	Address Correction Post Office	41	0.666%
RFND	Return For Non-Delivery	2,036	33.079%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,155	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,632	26.515%
Claims Not Processed	77	1.251%
Total Claims Received	1,709	27.766%

## Status Report as of January 17, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,581</b>	25.686%
	Requested Job Training	<b>1,440</b>	23.396%
	Requested Tattoo Removal	<b>411</b>	6.677%
	Requested Removal From Gang Injunction	<b>589</b>	9.569%
	Transfer Job Training to Relative	<b>407</b>	6.613%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.374%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>18</b>	0.292%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,632</b>	26.515%
	Total Notices Mailed	<b>6,155</b>	



**City of LA****Status Report as of January 17, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>452</b>
	No	Yes	No	No	<b>14</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>180</b>
	Yes	No	Yes	No	<b>283</b>
	Yes	No	No	Yes	<b>271</b>
	No	Yes	No	Yes	<b>1</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>152</b>
	Yes	Yes	No	Yes	<b>36</b>
	Yes	No	Yes	Yes	<b>72</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>25</b>
Selected No Options	No	No	No	No	<b>46</b>

Total Claims: **1,630**

**City of LA**

**Status Report as of January 17, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>452</b>	<b>14</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>180</b> <b>283</b> <b>271</b>	<b>180</b>  <b>1</b> <b>20</b>	<b>283</b>  <b>20</b> <b>0</b>	<b>271</b> <b>1</b> <b>0</b>
Selected 3 Options	<b>152</b> <b>36</b> <b>72</b>	<b>152</b> <b>36</b> <b>0</b>	<b>152</b>  <b>72</b> <b>0</b>	<b>36</b> <b>72</b> <b>0</b>
Selected All Options	<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>
Total Per Option:	<b>1,471</b>	<b>428</b>	<b>622</b>	<b>413</b>

**EXHIBIT PP-3**



## City of LA

Status Report as of July 7, 2023

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	65	1.055%
ACPO	Address Correction Post Office	41	0.665%
RFND	Return For Non-Delivery	2,037	33.063%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,161	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,695	27.512%
Claims Not Processed	79	1.282%
Total Claims Received	1,774	28.794%

## City of LA

Status Report as of July 7, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,645</b>	26.700%
	Requested Job Training	<b>1,501</b>	24.363%
	Requested Tattoo Removal	<b>426</b>	6.914%
	Requested Removal From Gang Injunction	<b>581</b>	9.430%
	Transfer Job Training to Relative	<b>441</b>	7.158%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>17</b>	0.276%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,695</b>	27.512%
	Total Notices Mailed	<b>6,161</b>	

**City of LA****Status Report as of July 7, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>474</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>189</b>
	Yes	No	Yes	No	<b>281</b>
	Yes	No	No	Yes	<b>302</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>43</b>
	Yes	No	Yes	Yes	<b>69</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>46</b>

Total Claims: **1,693**

**City of LA**

**Status Report as of July 7, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>474</b>	<b>15</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>189</b> <b>281</b> <b>302</b>	<b>189</b>  <b>2</b> <b>20</b>	<b>281</b>  <b>20</b> <b>0</b>	<b>302</b> <b>2</b> <b>0</b>
Selected 3 Options	<b>151</b> <b>43</b> <b>69</b>	<b>151</b> <b>43</b> <b>0</b>	<b>151</b>  <b>69</b> <b>0</b>	<b>43</b> <b>69</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,532</b>	<b>443</b>	<b>614</b>	<b>447</b>

**EXHIBIT PP-4**





## City of LA

**Status Report as of August 7, 2023**

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	63	1.023%
ACPO	Address Correction Post Office	41	0.665%
RFND	Return For Non-Delivery	2,091	33.939%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,161	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,716	27.853%
Claims Not Processed	78	1.266%
<b>Total Claims Received</b>	<b>1,794</b>	29.119%

## Status Report as of August 7, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,666</b>	27.041%
	Requested Job Training	<b>1,522</b>	24.704%
	Requested Tattoo Removal	<b>431</b>	6.996%
	Requested Removal From Gang Injunction	<b>580</b>	9.414%
	Transfer Job Training to Relative	<b>449</b>	7.288%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>17</b>	0.276%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,716</b>	27.853%
	Total Notices Mailed	<b>6,161</b>	

**City of LA****Status Report as of August 7, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>483</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>194</b>
	Yes	No	Yes	No	<b>280</b>
	Yes	No	No	Yes	<b>310</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>43</b>
	Yes	No	Yes	Yes	<b>69</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>46</b>

Total Claims: **1,714**

**City of LA**

**Status Report as of August 7, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>483</b>	<b>15</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>194</b> <b>280</b> <b>310</b>	<b>194</b>   <b>2</b> <b>20</b>	 <b>280</b>  <b>20</b> <b>0</b>	  <b>310</b> <b>2</b>  <b>0</b>
Selected 3 Options	<b>151</b> <b>43</b> <b>69</b>	<b>151</b> <b>43</b>  <b>0</b>	<b>151</b>  <b>69</b> <b>0</b>	 <b>43</b> <b>69</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,553</b>	<b>448</b>	<b>613</b>	<b>455</b>

**EXHIBIT PP-5**



## City of LA

**Status Report as of September 15, 2023**

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	63	1.023%
ACPO	Address Correction Post Office	39	0.633%
RFND	Return For Non-Delivery	2,123	34.459%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,161	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,733	28.129%
Claims Not Processed	79	1.282%
<b>Total Claims Received</b>	<b>1,812</b>	29.411%

## City of LA

## Status Report as of September 15, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,683</b>	27.317%
	Requested Job Training	<b>1,539</b>	24.980%
	Requested Tattoo Removal	<b>433</b>	7.028%
	Requested Removal From Gang Injunction	<b>580</b>	9.414%
	Transfer Job Training to Relative	<b>456</b>	7.401%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>17</b>	0.276%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,733</b>	28.129%
	Total Notices Mailed	<b>6,161</b>	

**City of LA****Status Report as of September 15, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>492</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>195</b>
	Yes	No	Yes	No	<b>280</b>
	Yes	No	No	Yes	<b>316</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>44</b>
	Yes	No	Yes	Yes	<b>69</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>46</b>

Total Claims: **1,731**



**City of LA**

**Status Report as of September 15, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>492</b>	<b>15</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>195</b> <b>280</b> <b>316</b>	<b>195</b>  <b>2</b> <b>20</b>	<b>280</b>  <b>20</b> <b>0</b>	<b>316</b>  <b>2</b> <b>0</b>
Selected 3 Options	<b>151</b> <b>44</b> <b>69</b>	<b>151</b> <b>44</b> <b>0</b>	<b>151</b>  <b>69</b> <b>0</b>	<b>44</b> <b>69</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,570</b>	<b>450</b>	<b>613</b>	<b>462</b>

**EXHIBIT PP-6**



## City of LA

Status Report as of October 6, 2023

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	63	1.023%
ACPO	Address Correction Post Office	39	0.633%
RFND	Return For Non-Delivery	2,126	34.507%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,161	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,753	28.453%
Claims Not Processed	77	1.250%
Total Claims Received	1,830	29.703%

## Status Report as of October 6, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,704</b>	27.658%
	Requested Job Training	<b>1,559</b>	25.304%
	Requested Tattoo Removal	<b>439</b>	7.125%
	Requested Removal From Gang Injunction	<b>579</b>	9.398%
	Transfer Job Training to Relative	<b>466</b>	7.564%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>16</b>	0.260%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,753</b>	28.453%
	Total Notices Mailed	<b>6,161</b>	

**City of LA****Status Report as of October 6, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>498</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>200</b>
	Yes	No	Yes	No	<b>279</b>
	Yes	No	No	Yes	<b>325</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>45</b>
	Yes	No	Yes	Yes	<b>69</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>46</b>

Total Claims: **1,751**

**City of LA**

**Status Report as of October 6, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>498</b>	<b>15</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>200</b> <b>279</b> <b>325</b>	<b>200</b>  <b>2</b> <b>20</b>	<b>279</b>  <b>20</b> <b>0</b>	<b>325</b>  <b>2</b> <b>0</b>
Selected 3 Options	<b>151</b> <b>45</b> <b>69</b>	<b>151</b> <b>45</b>  <b>0</b>	<b>151</b>  <b>69</b> <b>0</b>	<b>45</b> <b>69</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,590</b>	<b>456</b>	<b>612</b>	<b>472</b>

**EXHIBIT PP-7**



## City of LA

Status Report as of November 14, 2023

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	63	1.023%
ACPO	Address Correction Post Office	39	0.633%
RFND	Return For Non-Delivery	2,128	34.540%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,161	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,777	28.843%
Claims Not Processed	77	1.250%
Total Claims Received	1,854	30.093%



## City of LA

## Status Report as of November 14, 2023

## Claims Processed Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	Valid Claim	<b>1,728</b>	28.047%
	Requested Job Training	<b>1,582</b>	25.678%
	Requested Tattoo Removal	<b>440</b>	7.142%
	Requested Removal From Gang Injunction	<b>578</b>	9.382%
	Transfer Job Training to Relative	<b>478</b>	7.758%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.390%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>16</b>	0.260%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,777</b>	28.843%
	Total Notices Mailed	<b>6,161</b>	

**City of LA****Status Report as of November 14, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>509</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>70</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>201</b>
	Yes	No	Yes	No	<b>278</b>
	Yes	No	No	Yes	<b>337</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>45</b>
	Yes	No	Yes	Yes	<b>69</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>47</b>

Total Claims: **1,775**

**City of LA**

**Status Report as of November 14, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>509</b>	<b>15</b>	<b>70</b>	<b>8</b>
Selected 2 Options	<b>201</b> <b>278</b> <b>337</b>	<b>201</b>  <b>2</b> <b>20</b>	<b>278</b>  <b>20</b> <b>0</b>	<b>337</b>  <b>2</b> <b>0</b>
Selected 3 Options	<b>151</b> <b>45</b> <b>69</b>	<b>151</b> <b>45</b> <b>0</b>	<b>151</b>  <b>69</b> <b>0</b>	<b>45</b> <b>69</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,613</b>	<b>457</b>	<b>611</b>	<b>484</b>

**EXHIBIT PP-8**



## City of LA

**Status Report as of December 20, 2023**

### Mail Received Summary

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
NCOA	Address Correction - NCOA	63	1.022%
ACPO	Address Correction Post Office	39	0.633%
RFND	Return For Non-Delivery	2,128	34.534%
OBJ	Objections	0	0.000%
OPT	Request For Exclusion	0	0.000%
	Total Notices Mailed	6,162	

### Claims Received Summary

<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
Claims Processed	1,795	29.130%
Claims Not Processed	77	1.250%
<b>Total Claims Received</b>	<b>1,872</b>	30.380%

**City of LA****Status Report as of December 20, 2023****Claims Processed Summary**

<u>Code</u>	<u>Description</u>	<u>Count</u>	<u>Percent of Total</u>
C000	<b>Valid Claim</b>	<b>1,746</b>	28.335%
	Requested Job Training	<b>1,600</b>	25.966%
	Requested Tattoo Removal	<b>442</b>	7.173%
	Requested Removal From Gang Injunction	<b>575</b>	9.331%
	Transfer Job Training to Relative	<b>486</b>	7.887%
DDNQ	Not Eligible	<b>25</b>	0.406%
	Requested Job Training	<b>23</b>	0.373%
	Requested Tattoo Removal	<b>11</b>	0.179%
	Requested Removal From Gang Injunction	<b>24</b>	0.389%
	Transfer Job Training to Relative	<b>4</b>	0.065%
DMTP	Multiple Deficiencies	<b>1</b>	0.016%
	Requested Job Training	<b>0</b>	0.000%
	Requested Tattoo Removal	<b>0</b>	0.000%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>0</b>	0.000%
DREM	Removal Form Not Provided/Incomplete	<b>7</b>	0.114%
	Requested Job Training	<b>7</b>	0.114%
	Requested Tattoo Removal	<b>4</b>	0.065%
	Requested Removal From Gang Injunction	<b>7</b>	0.114%
	Transfer Job Training to Relative	<b>1</b>	0.016%
DSIG	No Signature	<b>16</b>	0.260%
	Requested Job Training	<b>1</b>	0.016%
	Requested Tattoo Removal	<b>2</b>	0.032%
	Requested Removal From Gang Injunction	<b>1</b>	0.016%
	Transfer Job Training to Relative	<b>1</b>	0.016%
	Total Claims Processed	<b>1,795</b>	29.130%
	Total Notices Mailed	<b>6,162</b>	

**City of LA****Status Report as of December 20, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>	<b>Total</b>
Selected 1 Option	Yes	No	No	No	<b>518</b>
	No	Yes	No	No	<b>15</b>
	No	No	Yes	No	<b>69</b>
	No	No	No	Yes	<b>8</b>
Selected 2 Options	Yes	Yes	No	No	<b>203</b>
	Yes	No	Yes	No	<b>277</b>
	Yes	No	No	Yes	<b>346</b>
	No	Yes	No	Yes	<b>2</b>
	No	Yes	Yes	No	<b>20</b>
	No	No	Yes	Yes	<b>0</b>
Selected 3 Options	Yes	Yes	Yes	No	<b>151</b>
	Yes	Yes	No	Yes	<b>45</b>
	Yes	No	Yes	Yes	<b>68</b>
	No	Yes	Yes	Yes	<b>0</b>
Selected All Options	Yes	Yes	Yes	Yes	<b>23</b>
Selected No Options	No	No	No	No	<b>48</b>

Total Claims: **1,793**

**City of LA**

**Status Report as of December 20, 2023**

	<b>Requested Job Training</b>	<b>Requested Tattoo Removal</b>	<b>Requested Removal From Gang Injunction</b>	<b>Transfer Job Training To Relative</b>
Selected 1 Option	<b>518</b>	<b>15</b>	<b>69</b>	<b>8</b>
Selected 2 Options	<b>203</b> <b>277</b> <b>346</b>	<b>203</b> <b>2</b> <b>20</b>	<b>277</b> <b>20</b> <b>0</b>	<b>346</b> <b>2</b> <b>0</b>
Selected 3 Options	<b>151</b> <b>45</b> <b>68</b>	<b>151</b> <b>45</b> <b>0</b>	<b>151</b> <b>68</b> <b>0</b>	<b>45</b> <b>68</b> <b>0</b>
Selected All Options	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>
Total Per Option:	<b>1,631</b>	<b>459</b>	<b>608</b>	<b>492</b>



**EXHIBIT QQ**

**Ghirlandi Guidetti**

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**From:** Ghirlandi Guidetti  
**Sent:** Monday, September 18, 2023 1:09 PM  
**To:** 'Karina Henriquez'  
**Cc:** Juan Romero; Stephanie Carroll; Ash Rojo; Donny Brooks  
**Subject:** RE: Rodriguez - [REDACTED]  
**Attachments:** Rodriguez CAC Data Tracker All Years.xlsx

Dear Juan and Karina,

We understand from the email below that EWDD is now capping benefits at \$10,000 because of an increase in claims.

We've reviewed the CAC reports since the beginning of the settlement program and do not see a significant increase in claim forms submitted recently. Attached is our analysis.

Moreover, the provider/WorkSource center financial records you provided us in July reflect that many class members have received benefits in excess of the \$10,000 average stated in the settlement agreement. For example:

<u>Claim No.</u>	<u>Name</u>	<u>YTD Total</u>
<i>AADAP</i>		
80174670	[REDACTED]	20,682.07
95055299	[REDACTED]	18,440.94
<i>Canoga Park</i>		
80186829	[REDACTED]	25,504.29
92370839	[REDACTED]	22,488.50
95043297	[REDACTED]	20,515.25
<i>Catholic Charities</i>		
95001613	[REDACTED]	16,851
<i>HACLA</i>		
80157674	[REDACTED]	19,212.40
80175790	[REDACTED]	16,011.00
80160390	[REDACTED]	18,907.36
<i>JVS</i>		
95080867	[REDACTED]	55,782.59
95092375	[REDACTED]	15,587.64
<i>Managed Career Solutions</i>		
80160502	[REDACTED]	28,173.18
95005574	[REDACTED]	29,788.60

We maintain that the settlement program should cover [REDACTED] educational expenses. Please let us know your position.

Relatedly, we understand that [REDACTED] submitted her receipts via email on 08/22 for the amount of \$3,455.55. Please advise when she can expect reimbursement.

Thank you,  
Ghirlandi

**From:** Karina Henriquez <karina.henriquez@lacity.org>  
**Sent:** Friday, July 21, 2023 11:24 AM  
**To:** Ghirlandi Guidetti <gguidetti@publiccounsel.org>  
**Cc:** Juan Romero <juan.romero@lacity.org>; Stephanie Carroll <scarroll@publiccounsel.org>; Ash Rojo <arojo@publiccounsel.org>; Donny Brooks <donny.brooks@lacity.org>  
**Subject:** Re: Rodriguez - [REDACTED]

Good morning Ghirlandi,  
Thank you for following up with this email. Please excuse my delay in responding. We have been receiving a high volume of calls, emails and text messages lately.

I emailed [REDACTED] on 7/10/23 to let her know I had approved her request on 6/30/23 and that it would take (approximately) 4-7 weeks before it gets disbursed to her.  
7/14/23: I emailed [REDACTED] and asked her to call me. I spoke with the agency processing her request and wanted to convey the message to her.  
7/18/2023: [REDACTED] returned my call. I spoke with her and informed her of the information I had received from the agency.  
7/19/23: The agency case manager spoke with [REDACTED] and provided her with instructions for her request.

I'm sure she should be getting her disbursement soon. I'll continue to follow up with it.

As far as the tuition cost, [REDACTED] mother informed me a few months back that they would look to apply for financial aid. We want to support her and all current and future LARCA claimants. The new funding we were recently approved for, will sustain roughly about 100 claimants or more, the GRYD organizations supporting with recruitment and the 64 participants recently identified and pending enrollment. We are receiving calls from claimants aggressively seeking their full allocation. We can support her with books and school materials she may need that her financial aid hasn't covered. As far as extending the aid to pay full tuition, at this time, we cannot commit as we need to support the new enrollments. In the past some requests may have been approved for amounts over the agreed settlement allocation per claimant. As I understand it, it was due to lower enrollment numbers. Now with the uptick with enrollments, we need to make sure we accommodate new requests.

It has gotten overwhelming to encounter claimants demanding higher amounts than the agreed settlement. We hear each case independently and they are all valid. However, like I mentioned above, with the increase in enrollments, the current funding cannot support approvals over the agreed allocation per claimant. Hope your office can understand.

Take care.

On Fri, Jul 21, 2023 at 9:37 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Karina – bumping this up. I know you are busy and I appreciate a response whenever you can!

Best,

Ghirlandi

---

**From:** Ghirlandi Guidetti

**Sent:** Friday, July 14, 2023 4:22 PM

**To:** Karina Henriquez <[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>; Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>

**Cc:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>

**Subject:** Rodriguez - [REDACTED]

Hi Karina,

I understand that class member [REDACTED] and her mother, [REDACTED], were previously in contact with you and that [REDACTED] was approved for a \$3,000 reimbursement for her small business expenses. Can you check on the status of that payment and let me know when they can expect it?

Relatedly, [REDACTED] contacted us for assistance obtaining additional benefits so she can cover her CSU tuition. She will be beginning school in the fall and is anxious to figure out how she will pay for school. I understand you informed her that LARCA cannot pay her tuition because she already received benefits at or near the \$10,000 average benefit.

For a young person like [REDACTED] it is quite the accomplishment and a life changing opportunity to be able to attend Cal State. This is exactly the kind of life improving opportunity the settlement is intended to help class members with. I appreciate that [REDACTED] requested and received benefits before this opportunity presented itself so she would be receiving more than the average benefit, but I hope you will agree this is a worthwhile endeavor that LARCA should support. We are aware of other class members receiving benefits beyond the \$10 average. Can you please help me understand the criteria being used to approve benefits over that amount?

Thank you,

**Ghirlandi Guidetti**

(213) 385-2977 x176

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

--

Karina Henriquez  
Senior Project Assistant  
City of Los Angeles,  
Economic & Workforce Development Department  
1200 West 7th Street  
Los Angeles, CA 90017  
Work cell: 213.663.3718

*"A leader sees GREATNESS in other people.  
She or He can't be much of a leader  
if all he or she sees are themselves"-Maya Angelou-*



**EXHIBIT RR**

**CITY OF LOS ANGELES**  
CALIFORNIA

CAROLYN M. HULL  
GENERAL MANAGER

**ECONOMIC AND WORKFORCE  
DEVELOPMENT DEPARTMENT**

1200 W. 7<sup>TH</sup> STREET  
LOS ANGELES, CA 90017



ERIC GARCETTI  
MAYOR

**DATE:** September 19, 2022

**TO:** Los Angeles Reconnections Career Academy 2.0 Providers

**FROM:** Carolyn M. Hull, General Manager *Carolyn M. Hull*  
Economic and Workforce Development Department

**SUBJECT: WDS DIRECTIVE No. 23-01**  
*(Supersedes WDS Directive No. 21-15)*  
**LOS ANGELES RECONNECTIONS CAREER ACADEMY 2.0”  
CALJOBS<sup>SM</sup> AND INVOICING GUIDELINES, CALJOBS CLOSE-OUT  
INSTRUCTIONS, AND SUBMISSION OF SUCCESS STORIES**

**EFFECTIVE DATE**

This directive is effective upon date of issue.

**PURPOSE**

The purpose of this directive is to set forth the CalJOBS<sup>SM</sup> Management Information System (MIS) as of September 19, 2022 through the program extension of June 27, 2023 for the City of Los Angeles Los Angeles Reconnections Career Academy (LARCA) 2.0 contracts. The following activity codes and service modules have been modified: Enrollment Evaluation and Assessment; Case Management Sessions; Career Services and Employment Readiness Workshops; and Vocational Training and Education. Compensation of all other service modules remain unchanged. The directive also sets forth Referral guidelines, CalJOBS Close-Out instructions, and the submissions of Success Stories.

**BACKGROUND**

LARCA 2.0 will provide members of the plaintiff class in the case of “Rodriguez vs. the City of Los Angeles” with a Jobs and Education Program including work readiness and employment services in preparation for entering the workforce, apprenticeship programs, and vocational training opportunities leading to available employment in high demand industries. Participants may receive career counseling, case management, support services, employment readiness, vocational training and education, subsidized employment and employment services through the program administered by the Economic and Workforce Development Department (EWDD). All eligible participants must be pre-approved through the court-designated claims administrator. The contract term for LARCA 2.0 will be retroactive from June 1, 2017 to June 27, 2023.

The City of Los Angeles (City) will contribute a minimum of \$1.125 million, and up to a maximum of \$7.5 million per year, over a four-year period to LARCA 2.0. The LARCA 2.0 service providers include procured City of Los Angeles Workforce Innovation and

This WIOA Title I financially assisted program or activity is an equal opportunity employer/program.  
Auxiliary aids and services are available upon request to individuals with disabilities.



Opportunity Act (WIOA) Workforce Development System (WDS) providers and the Los Angeles Regional Initiative for Social Enterprise (LA:RISE) service providers.

The average estimated expenditure per participant is approximately \$10,000. Participants may receive up to \$1,000 in support service funds to address barriers to employment, retention of current employment, and needs-related payments necessary to enable program participation. Participants may also receive up to \$1,000 in stipends pursuant to completion of their educational and training milestones.

LARCA 2.0 will be reviewed annually by a third-party evaluator, California State University Northridge, to ensure appropriate services are being provided to program participants.

**MIS GUIDELINES**

As the source of monies for LARCA 2.0 are City General Purpose funds, participants are **NOT** to be co-enrolled into the City’s WIOA programs nor other special grant-funded programs without the express written pre-authorization of the City. However, if the participant is already receiving services through a City-funded grant, such as the LA:RISE or WIOA Programs, that participant is still eligible to receive additional services through this program.

The participant should not receive duplicate services; nor should the service provider seek reimbursement for services already provided through other programs. Co-enrollment will require written pre-approval from the City.

For purposes of tracking LARCA 2.0 participant activities and outcomes, service providers shall continue to use local **Grant Code LAI554** for the LARCA 2.0 program in CalJOBS.

Grant Type	Grant ID	Grant Name	Local Grant Code	Date Added	Action
Local Funded Grant	564	LARCA 2.0	LAI554		<a href="#">Add</a>

As delineated in the instructions below, LARCA 2.0 provider case managers must input the following three (3) specific activities that are **required** in order to enroll LARCA 2.0 participants:

- 101 –Orientation & Program Intake (use worksheet)
- 102 – Initial Assessment
- 306 – “Prerequisite Training”

**Optional:**

- 226 – Reading and/or Math Testing
- 205 – Development of Individual Education and Employment Plan (IEEP)

**Please note:** Activity Code 226 – “Reading and/or Math Testing” and Activity Code 205 – “Development of the IEEP” are optional and only required if the participant is expected to enroll in a classroom training program. Activity 306- “Prerequisite Training” activities must be input for each participant to prevent the record from “soft exiting” during the life of the program. The end date of June 27, 2023 must be used for Activity Code 306- “Prerequisite Training”.

**MIS REQUESTS**

For any needed MIS requests (such as data correction, assigning a pseudo social security number, or provider transfers), providers must use the attached “**LARCA 2.0 CalJOBS Request for Correction & Transfer Form**” and email it to [Emoli.Mendez@lacity.org](mailto:Emoli.Mendez@lacity.org) and [Celene.Heredia@lacity.org](mailto:Celene.Heredia@lacity.org) with the subject heading: “LARCA 2.0 MIS Request, [provider name] and [contract number].”

**Co-enrollments:** If the participant is already in the CalJOBS system, providers are required to e-mail the EWDD MIS Unit at [Emoli.Mendez@lacity.org](mailto:Emoli.Mendez@lacity.org) and [Celene.Heredia@lacity.org](mailto:Celene.Heredia@lacity.org) to secure pre-approval, prior to co-enrolling the participant.

**Provider Transfers:** If the participant goes to another LARCA 2.0 provider to request services, the new provider, upon verifying participant enrollment with the provider of record, should proceed to submit the “**LARCA 2.0 CalJOBS Request for Correction & Transfer Form**,” select “provider transfer” and email the EWDD MIS Unit at [Emoli.Mendez@lacity.org](mailto:Emoli.Mendez@lacity.org) and [Celene.Heredia@lacity.org](mailto:Celene.Heredia@lacity.org), as well as notify the previous service provider. The new transfer provider will need to review the participant’s file and continue servicing the client based on the participant’s outlined IEEP and progress to date.

**REQUIRED SERVICE ACTIVITY CODES**

The following service activity codes must be reported in CalJOBS.org:

<b>MIS REQUIRED SERVICE ACTIVITY CODES</b>			
<b>SERVICE MODULE</b>	<b>SERVICE ACTIVITY</b>	<b>CALJOBS CODE</b>	<b>DOCUMENTS/FORMS TO UPLOAD TO CALJOBS</b>
<b>Outreach</b>	Outreach	N/A	N/A
<b>Enrollment, Evaluation, &amp; Assessment</b>	CalJOBS Enrollment: <i>Orientation &amp; Program Intake</i>	101	➤ Copy of approval letter (required if not previously collected)
	<i>Initial Assessment (Basic Needs &amp; Skills)</i>	102	➤ Basic Needs & Skills Assessment Worksheet
	<i>Prerequisite Training</i> <b>Note:</b> Code 306 supersedes Code 311	306	<b>Note:</b> To keep record from soft exiting, use end date of: 06-27-2023
<b>Case Management (CM) Sessions</b>	CM Sessions & Support: <i>Individual Counseling</i> <b>Note:</b> Enter service activity code to reflect CM sessions/active communication exchanges.	200	➤ Case Management Sessions Update Form
<b>Career Services and Employment Readiness Workshops</b>	Pre-employment skills training or workshop(s) to support a participant’s IEEP: <i>Short-Term Pre-vocational Services</i> <b>Note:</b> Enter appropriate activity code to reflect each completed workshop (7).	215	➤ Workshop flyer, sign-in sheet or certificate of completion. ➤ Copy of participant’s resume
	<i>Financial literacy education</i>	221	➤ Same as above

MIS REQUIRED SERVICE ACTIVITY CODES			
SERVICE MODULE	SERVICE ACTIVITY	CALJOBS CODE	DOCUMENTS/FORMS TO UPLOAD TO CALJOBS
<b>Vocational Training &amp; Education</b>	<i>Development of the IEEP Skills Assessment</i> <b>Note:</b> Enter service activity codes only for participants interested in training services.	205 226	➤ IEEP Form (required) ➤ Skills Assessment Tool (optional)
	<i>Education and Training to support the participant's IEEP:</i>	Any of the following:	➤ Vocational Training and/or Education agreements
	301 On-the-Job Training	301 304	➤ Proof of Payment ➤ Certificate of completion
	304 Customized Training	313	
	313 Placed in State/ Local Training (non-TAA non-WIOA)		<b>Tuition:</b> ➤ Proof of academic good standing (i.e.: transcripts, progress reports)
	328 Occupational Skills Training (non ETPL provider)	328	➤ Financial aid award letter ➤ Proof of Payment
<b>Vocational Training and Education Stipends</b>	<i>Supportive Services: Incentive/Bonuses</i> <b>Note:</b> Enter service activity code up to 2 times to reflect the two \$500 stipend milestones.	183	➤ Stipend Verification Form and Proof of Payment with participant signature
<b>Transitional Employment Wages</b>	Transitional Employment: <i>Work Experience</i>	219	➤ Transitional Employment agreement ➤ Participant paystubs with employment dates
<b>Job Placement and Follow-up Services</b>	<i>Follow-up Services After Employment</i> <b>Note:</b> Enter service activity code up to 12 times to reflect interactive follow-up meetings.	106	➤ Case note in CalJOBS
<b>Support Services</b>	<i>Supportive Services:</i> 180 Supportive Service: Child/Dependent Care 181 Supportive Service: Transportation Assistance 184 Supportive Service: Temporary Shelter 185 Supportive Service: Other 186 Supportive Service: Seminar /Workshop Allowance 187 Supportive Service: Job Search Allowance 188 Supportive Service: Tools/Clothing 189 Supportive Service: Housing Assistance 190 Supportive Service: Utilities 191 Supportive Service: Educational Testing 192 Supportive Service: Post- Secondary Academic Materials	Any of the following: 180 181 182 184 185 186  187 188 189 190 191 192	➤ Supportive Services Verification Form with participant signature ➤ Needs related payment verification (i.e.: copies of receipts, tap cards, grocery or gas cards) ➤ EWDD prior approval required

MIS Required Service Activity Codes: Providers shall enter **ONLY** the service activity codes outlined in this Directive. To support capture the impact of the services provided to each participant, detailed Case Notes must be included on CalJOBS for each monthly service provided to the participant. .

**Documents to Upload to CalJOBS:**

1. Providers shall request and keep a copy of the participant’s “Approval Letter” at intake to verify program eligibility.
2. Providers shall use the following LARCA 2.0 program standardized forms:
  - a. Program Intake Worksheet;
  - b. Informed Consent;
  - c. Initial Assessment Worksheet;
  - d. Support Services Verification;
  - e. Education and Vocational Training Stipends Verification;
  - f. Case Management Sessions Update;
  - g. Transitional Employment Notification; and
  - h. Individual Training Account.

**INVOICING GUIDELINES**

For the LARCA 2.0 program, contracted providers shall be paid for service expenditures up to the maximum amount specified in the Expenditure Table below.

***NOTE: All program service activities must be reported in CalJOBS to receive payment.***

<b>EXPENDITURE TABLE</b>		
<b>SERVICE MODULE</b>	<b>UP TO MAXIMUM AMOUNT</b>	<b>REQUIRED ELEMENTS AND DOCUMENTATION</b>
<b>Outreach</b>		
<b>Outreach</b>	<b>\$10,000</b> per program year for Outreach activities	<b>1. Outreach: (retroactive to July 1, 2019)</b> <i>Outreach and recruitment activities (\$25/hour)</i> Contractor must report Outreach Activity on monthly invoice. <b>2. Detailed Outreach Log Must be Included with Monthly Invoice</b>
<b>Enrollment, Evaluation &amp; Assessment</b>		
<b>Enrollment, Evaluation &amp; Assessment</b>	<b>\$300</b> per participant enrollment (One-time expense)	<b>Enrollment, Evaluation, &amp; Assessment (All of the following are required to receive payment):</b> CalJOBS must reflect the following service codes: <ul style="list-style-type: none"> <li>• Orientation &amp; Program Intake (use worksheet),</li> <li>• Initial Assessment,</li> <li>• “Prerequisite Trainings”</li> </ul>
<b>Case Management (CM) Sessions and Supports</b>		
	CM Sessions/ Support \$4,800/year per	<b>1. CM Sessions:</b> <i>Up to 4 program services per month to address barriers to employment and/or education as identified in the IEEP.</i>

EXPENDITURE TABLE		
SERVICE MODULE	UP TO MAXIMUM AMOUNT	REQUIRED ELEMENTS AND DOCUMENTATION
<b>CM Sessions &amp; CM Support</b>	Participant  Up to <b>\$1,200/year</b> (billed at \$100/month per "Active" Participant*)	<ul style="list-style-type: none"> <li>• Payment will be based on the number of monthly program services documented on CalJOBS and detailed on CalJOBS <b>Case Notes</b>.</li> <li>• At a minimum, one "active communication" exchange and service should be documented per month. Direct communication may be in-person, via video conferencing, or phone calls).</li> </ul> <p><b>2. CM Support:</b></p> <ul style="list-style-type: none"> <li>• Payment will be based on the number of services documented on CalJOBS and detailed in the <b>Case Notes</b>.</li> </ul> <p><b>Note:</b> *Active Participant: receives a minimum of one service activity per month.</p>
<b>Performance Reporting, Collaboration Sessions/Meeting and Training Attendance</b>		
<b>Performance Reporting</b>	Up to <b>\$1,200/year</b> (billed at \$50/month per Monthly Reporting and \$50/month per Monthly Meeting Attendance)	<b>3. Performance Reporting:</b> Performance reporting, summaries, and success stories and other supplemental reports as requested by EWDD including CalJOBS "Monthly Online Characteristics Report"
<b>Collaboration Sessions/ Meetings and Training</b>		<b>4. Collaboration Sessions/Meetings and Training</b> Attendance by LARCA 2.0 primary public contact at collaboration meetings, training, and best practice sessions as scheduled by the City as evidenced by sign-in sheets.
<b>Career Services and Employment Readiness Workshops</b>	<b>Up to \$500 per participant (\$500 Stipend for completing workshop series/ Payment will be matched per participant)</b>	<p><i>Payment will be based on the number of workshops completed; however, actual costs are required to be reported for any "contracted" workshops)</i></p> <ul style="list-style-type: none"> <li>• Financial literacy certificate of completion</li> <li>• Up to seven (7) pre-employment skills training or workshops (ex. job search skills, resume-writing, interviewing skills, computer basics, money management, personal accountability, stress solutions, research and preparation, soft skills training, customer service, and work etiquette)</li> <li>• Workshop flyer and sign-in sheet or certificate of completion</li> <li>• CalJOBS summary case notes outlining skills training workshops completed by participant</li> <li>• Participant's Resume</li> <li>• Completed Job Readiness Assessment Tool compensated at \$80/assessment, provided participant has completed a minimum of one (1) job readiness workshop.</li> </ul>
<b>Vocational Training &amp; Education</b>	<b>\$5,000</b> per participant	<ul style="list-style-type: none"> <li>• Detailed Individual Education and Employment Plan (IEEP) that clearly identifies the participant's barriers to employment, the plan of action to address those barriers, and the participant's education and employment goals (required).</li> <li>• Training agreement (payment for actual cost of training; for total hours completed by participant)</li> <li>• Attendance record or certificate of completion</li> <li>• Completed Skills Assessment Tool (optional)</li> <li>• Jobs LA summary case notes confirming the successful completion of IEEP training and education goals in CalJOBS</li> </ul>
<b>Training and Education Stipends</b>	<b>\$1,000</b> per participant	<ul style="list-style-type: none"> <li>• Verification of Payment and Stipend Verification Form with participant signature on both documents</li> <li>• Jobs LA case notes confirming successful completion of IEEP</li> </ul>

EXPENDITURE TABLE		
SERVICE MODULE	UP TO MAXIMUM AMOUNT	REQUIRED ELEMENTS AND DOCUMENTATION
		education and training milestones in CalJOBS (up to \$1,000)
<b>Transitional Employment Wages</b>	<b>\$6,500*</b> per participant	<ul style="list-style-type: none"> <li>• Transitional Employment Agreement, Approved up to \$20 hourly wage and for a total of 325 hours (payment for wage reimbursement based on actual number of hours worked)</li> <li>• Copy of Participant’s Paystubs</li> <li>• Completed Job Readiness Assessment Tool (at midpoint and at conclusion)</li> <li>• CalJOBS case notes confirming successful completion of transitional employment</li> </ul> <p><b>*Note: Payroll related taxes, fees, and insurance costs may also be billed.</b></p>
<b>Job Placement and Follow-Up Services</b>	<b>\$900</b> per participant (\$75 per month)	<ul style="list-style-type: none"> <li>• Proof of employment (e.g. Employment Verification Letter or copy of participant pay stub)</li> <li>• CalJOBS summary case notes clearly documenting Contractor’s role in securing job placement for the participant (e.g. job referral, facilitated interview with an employer, brokered placement after completion of transitional employment, targeted recruitment)</li> <li>• CalJOBS summary case notes documenting the follow-up meetings and services provided.</li> <li>• Up to twelve (12) monthly face-to-face/active communication exchange follow-up meetings to assist with employment retention (e.g. in person meeting, video calling, telephone calls).</li> </ul>
<b>Support Services</b>	<b>\$1,000</b> per participant	<ul style="list-style-type: none"> <li>• Supportive Services Verification Form with participant signature (one-time only, up to \$1,000)</li> <li>• Proof of services rendered to participant (ie: receipts, gas cards or grocery cards, etc.).</li> </ul>
<b>Success Stories</b>	<b>\$1,200 per year</b>  <b>\$100</b> - Written <b>\$200</b> – Video  Per unduplicated participant	<ul style="list-style-type: none"> <li>• Success stories may be submitted in the form of a written testimonial summary or via video recording</li> <li>• Success Stories must follow guidelines specified in the Success Stories submission Directive.</li> <li>• LARCA 2.0 Media Consent Form must be submitted along with success story</li> </ul>

**REQUEST FOR APPROVAL FORM (FOR EXCESS AMOUNT)**

On average, \$10,000 may be allocated per participant based on services provided. The costs for services are inclusive of all programmatic and administrative costs. Any cost in excess of that amount or in excess of the identified maximum amount per service module (*Case Management Sessions, Career Services and Employment Readiness Workshops, Vocational Training and Education, Transitional Employment, Follow-up Services, or Support Services*) must be pre-approved by the City using the attached LARCA 2.0 Request for Approval Form. The request form must be e-mailed to the LARCA 2.0 Unit at [LARCA2.0Approvals@lacity.org](mailto:LARCA2.0Approvals@lacity.org) with subject heading “LARCA 2.0 Request for Approval, [provider name], [contract #].” LARCA 2.0 Program Staff will review and approve the submitted requests.

**REFERRALS**

Upon receipt of referrals, service providers must follow up with all referrals within 2 business days. Status updates must be submitted to EWDD.

## **CalJOBS CASE CLOSE-OUT INSTRUCTIONS**

### CalJOBS Data

Contracted providers are to ensure that all data entries and activity codes are up to date and closed before completing a Closure form in the CalJOBS system.

All LARCA 2.0 milestones must be updated prior to any record closure including total hours of transitional employment completed, training, employment and education services, job readiness status, support services, and retention services provided.

### Activity End Dates

- The activity end date will be on or before the close-out date (June 27, 2023): Close the activity with the appropriate Activity Completion Status and actual end date.

Contracted Providers shall use the following “Exit Reasons”

- Participant is incarcerated and release date will be after June 27, 2023.
- Participant is deceased.
- Did not start the program, decided to transfer program benefits to a family member.

Case managers shall close the WIOA Title I Application when the participant will no longer receive services. Close the activity with the appropriate Activity Status and actual end date.

Contracted providers must ensure that all records with LARCA 2.0 (EWDD) local grant code LAI554 are closed on or before June 27, 2023.

### Participant File Folders

All substantiating documentation shall be included in participant case files to verify all services provided under LA City General Fund LARCA 2.0 (EWDD) program.

## **SUCCESS STORIES**

The sharing of success stories is an opportunity to highlight the work and positive impact contracted providers are having in the lives of the LARCA 2.0 participants. Success stories not only support in creating awareness, but also serve as an inspiration for current and future participants. Success stories may be submitted in the form of a written testimonial summary or via video recording. Success stories may include but are not limited to:

- Employment, Vocational Training or Education Placement
- Underemployed to Full Time Employment
- Employment, Training or Education Retention
- Completion of Transitional Employment Hours
- Completion of Vocational Training
- Completion of Career Services and Employment Readiness Workshops

Success Stories should include the following:

- Participant's name and contracted providers information
- What was the participant doing before joining the LARCA program?
- What motivated the participant to enroll in LARCA?
- Was there any hesitation about joining the program? If so, what were some of the concerns?
- What resources have been accessed to achieve employment, training or educational goals?
- How has the program benefited the participant, not only financially, but personally? Did the process boost the participants confidence, etc.?
- Would the participant recommend this program to others who may qualify for these services? Please explain why?

### **INVOICE TEMPLATE**

Contracted providers shall use the attached financial reporting forms and submit the package electronically to LARCA 2.0 program operations staff for review and approval before payment processing. Invoices are to be submitted to the LARCA 2.0 Unit via e-mail at [LARCA2.0Approvals@lacity.org](mailto:LARCA2.0Approvals@lacity.org) and copy Ricardo.Renteria at [Ricardo.Renteria@lacity.org](mailto:Ricardo.Renteria@lacity.org).

To receive payment, the invoice package must include:

1. A cover letter on official letterhead that includes a summary of expenditures and the LARCA 2.0 Invoice, both signed by an authorized provider representative.
2. LARCA 2.0 Invoice and Expenditure Report (in Excel). Expenditure Report must include CalJOBS ID number per participant (refer to updated Expenditure Report Form).
3. A copy of the "**CalJOBS Monthly Online Characteristics Report**" (in Excel) reflecting all service activities being invoiced. (Please reference attached LARCA 2.0 CalJOBS Reporting Instructions).
4. Copies of all supporting documents. (i.e. Training or Education payments, Reimbursements, Stipends, Transitional Employment Wages, and Supportive Services).

All required support documents outlined in the LARCA 2.0 CalJOBS Required Service Activity Codes table must be scanned and uploaded to participant's file in the CalJOBS system. All other standardized program forms and expenditure support documentation must be kept in the participant's file. All costs billed to the City must be accounted for and recorded separately in the provider's general ledger.

### **ZERO EXPENDITURES FISCAL REPORT**

Providers must submit an invoice on a monthly basis even if no services were rendered nor costs incurred during a particular month. The provider should indicate zero expenditure on the fiscal reporting forms and invoice. This will allow the City to ensure the accuracy of obligations or expenditures and to have positive confirmation that no subsequent charges will follow.



## **WDS CONTACTS**

Questions and/or concerns regarding this directive should be addressed to the LARCA 2.0 Unit, Ricardo Renteria at [Ricardo.Renteria@lacity.org](mailto:Ricardo.Renteria@lacity.org), (213) 744-9709 or Karina.Henriquez at [Karina.Henriquez@lacity.org](mailto:Karina.Henriquez@lacity.org), (213) 744-9375, TTY: 711.

### Program requests:

Address all questions and/or concerns regarding the CalJOBS MIS to [Emoli.Mendez@lacity.org](mailto:Emoli.Mendez@lacity.org) or [Celene.Heredia@lacity.org](mailto:Celene.Heredia@lacity.org).

Address all questions and/or concerns regarding program and fiscal approvals to [LARCA2.0Approvals@lacity.org](mailto:LARCA2.0Approvals@lacity.org).

CMH:GR:RR:KH:cg

- Attachments:
1. List of Standardized Program Forms (Rev. JULY 2019)
    - a. Participant Orientation Packet (Green)
    - b. Case Worker Toolkit Forms (Blue)
  2. LARCA 2.0 Request for Approval Form (Rev. JULY 2019)
  3. CalJOBS Reporting LARCA 2.0 Instructions (Rev. AUGUST2020)
  4. LARCA 2.0 CalJOBS Request for Correction & Transfer Form (Rev. AUGUST 2019)
  5. LARCA2.0 Financial Reporting Forms and Instructions (Rev. AUGUST 2019)  
\*Available for download from the EWDD website
  6. Media Consent Form

**EXHIBIT SS**

**McMahon, Robert**

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**From:** Scott Marcus <Scott.Marcus@lacity.org>  
**Sent:** Monday, November 29, 2021 1:18 PM  
**To:** Megan Vees; Stephanie Carroll  
**Cc:** Gerardo Ruvalcaba; Cindy Panuco; [ ORANGE ]; dstormer@hadsellstormer.com; Lupe Sanchez; Erika Luna; regina.mills@lacity.org; Ricardo Renteria; ari.malka@csun.edu  
**Subject:** Re: Rodriguez v. City of Los Angeles

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Megan & Stephanie:

I have been working on securing support for an extension since I received your letter. However, as you know, the City does not always make decisions as quickly as we would like.

Here is where we are:

- The City Attorney's Office will submit a recommendation to City Council to extend the benefit program by one year, to June 2023. If approved, funding for the one year extension will most likely be incorporated into the City's fiscal year 2022-2023 budget process. This means we may not know the result until April or May 2022.
- In order to avoid an interruption in benefits, the City will stipulate to extend the application period so that class members can continue to apply for benefits up through the current end of the benefit program in June 2022. Benefits provided to any class member who applies after December 2021 will be subject to the existing resources allocated to the program. This will allow people to continue to apply for and receive benefits while Council decides if it wants to extend the Program, and, if so, the budgeting process by which it will fund the extension.
- If/when Council approves an extension as part of the budget, we can amend the benefit period in the settlement agreement at that time.

Please let me know if you agree with proceeding in this manner.

As to your question about supportive services, I am informed that jobs and training related services are not on pause. Service providers who are nearing their total allocation have been asked to prioritize participant subsidized employment opportunities, training, and educational and employment service requests while additional allocations are being sought. These priorities include supportive services such as transportation, tools, clothing, etc., that will support the participants to meet their program goals. Participants who are employed or are business owners who are only seeking supportives services have been deemed a lesser priority, unless the supportive services are emergency needs. Service providers will continue to assess emergency needs and support the participants as necessary.

Gerardo and Ricardo, copied here, can provide additional information if necessary.

Scott Marcus  
Chief Assistant City Attorney

Civil Litigation Branch  
Los Angeles City Attorney's Office  
200 North Main Street  
City Hall East, 7th Floor  
Los Angeles, CA 90012  
(213) 978-4681

On Mon, Nov 29, 2021 at 10:26 AM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Dear Scott,

You indicated in your last email you would present the City's position to us last week, but we have yet to receive an update from you. As Stephanie mentioned, we are concerned at this delay. Please let us know the City's position as soon as possible. Please also provide a response to Stephanie's question below regarding supportive services.

Best,

**Megan Veas**

*(pronouns: she/her/hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

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**From:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Sent:** Thursday, November 18, 2021 10:01 AM

**To:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[sanchez@publiccounsel.org](mailto:sanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** RE: Rodriguez v. City of Los Angeles

Dear Scott,

Thank you for the update. However, we are very concerned at this delay. We first sought an extension and related meet and confer on October 5. It is Thanksgiving next week and December 27, the current deadline for claims, is looming. As we want to avoid any material interruption in the claims period, this delay leaves us very little time for us to prepare the necessary motion papers to seek an extension. Can you expedite this process and give us more insight into why this delay has occurred?

In addition, we have heard through service providers that “supportive services” i.e. anything not related to jobs and training, are on pause. Can you please explain why this is the case?

Sincerely,

Stephanie Carroll

Directing Attorney

Consumer Rights & Economic Justice

Tel: 213-385-2977 Ext. 137

Pronouns: she/her

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**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Tuesday, November 16, 2021 8:44 AM

**To:** Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; dstormer@hadsellstormer.com; Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

Thank you for checking in. I should know more by the end of this week and be able to present the City's position to you next week (the week of Nov 22).

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Mon, Nov 15, 2021 at 2:36 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Scott,

It's been about two weeks since your last email, so I'm writing to see if you have any updates.

Thank you,

**Megan Veas**

*(pronouns: she/her/hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

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**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Tuesday, November 2, 2021 6:13 PM

**To:** Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

I'm happy to meet and confer, but I'm still making inquiries about support for an extension. I propose you give me a couple weeks to see how far I can get.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Tue, Nov 2, 2021 at 4:52 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Scott,

Could you provide an estimated date by which you expect to have a response for us or think you'll be prepared to meet and confer?

Thank you,

**Megan Veas**

*(pronouns: she/her/hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

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**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Friday, October 22, 2021 1:20 PM

**To:** Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[luorange@att.net](mailto:luorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

I wanted to update you that we are continuing to discuss internally. I will let you know when I am in a position to address your request to meet and confer on a possible extension.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor



Los Angeles, CA 90012

(213) 978-4681

On Fri, Oct 15, 2021 at 4:44 PM Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)> wrote:

Megan:

I apologize for the delay. We are still discussing internally, which is taking longer to accomplish these days, but hope to have a response to you soon. Thank you for your patience.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Fri, Oct 15, 2021 at 4:36 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Dear Scott and Gerardo,

I'm writing to follow up about our letter requesting a meet and confer regarding a further extension. Please let us know by Wednesday Oct. 20 when you are available to meet and confer.

Thank you,

**Megan Vees**

*(pronouns: she/ her/ hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

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**From:** Megan Vees

**Sent:** Tuesday, October 5, 2021 11:00 AM

**To:** 'Scott Marcus' <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>

**Cc:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; '[ ORANGE ]' <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); 'Ricardo Renteria' <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; 'ari.malka@csun.edu' <[ari.malka@csun.edu](mailto:ari.malka@csun.edu)>

**Subject:** Rodriguez v. City of Los Angeles

Dear Scott and Gerardo,

We hope you are well. Please find attached a letter regarding our request for a further extension of the claims deadline and training program. We are available to meet and confer at your convenience.

Best,

**Megan Vees**

Staff Attorney – Consumer Rights & Economic Justice

*(pronouns: she/ her/ hers)*



Public Counsel

610 South Ardmore Avenue | Los Angeles, CA 90005

213.385.2977 x230 | 213.201.4722 – FAX

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

[publiccounsel.org](http://publiccounsel.org) | [facebook.com/publiccounsel](https://facebook.com/publiccounsel) | [twitter.com/publiccounsel](https://twitter.com/publiccounsel)

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\*\*\*\*\*

**EXHIBIT TT**

## Ghirlandi Guidetti

---

**From:** Gerardo Ruvalcaba <gerardo.ruvalcaba@lacity.org>  
**Sent:** Tuesday, January 11, 2022 6:07 PM  
**To:** Megan Veas  
**Cc:** Stephanie Carroll; Scott Marcus; Cindy Panuco; [ ORANGE ]; dstormer@hadsellstormer.com; Lupe Sanchez; regina.mills@lacity.org; Ricardo Renteria; ari.malka@csun.edu  
**Subject:** Re: Rodriguez v. City of Los Angeles  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Happy New Year Megan!

My apologies for the delay in getting back to you.

The contract updates were approved by City Council last month and all amendments have now been executed. Ricardo has also been in contact with service providers to ensure that there are no further delays in services. Please let me know if you hear about any further delays.

Thank you!

On Tue, Jan 4, 2022 at 5:28 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Hello Gerardo,

I hope your year is off to a good start!

Can you provide an update on whether the proposed updates to the contract amounts were approved by the City Council and, if so, whether those funds have been disbursed to providers?

Thank you,

**Megan Veas**

*(pronouns: she/ her/ hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

---

**From:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>  
**Sent:** Thursday, December 2, 2021 3:40 PM  
**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>  
**Cc:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu); Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>  
**Subject:** Re: Rodriguez v. City of Los Angeles

Hello Stephanie,

Scott was referring to service provider contract amounts. Contract amounts are updated as-needed with City Council approval. Our proposed updates were approved by committee in October and we are confident that they will be approved by Council by the end of month and thus avoid any further delays in the provision of support services.

Please let me know if you have further questions.

On Tue, Nov 30, 2021 at 4:08 PM Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)> wrote:

Dear Scott,

Thanks for the update. We agree the proposed extension is acceptable assuming the court accepts the stipulation – we will get started on the stip paperwork to extend the claims period.

As to the supportive services, could you please expand a little about what you mean by the service providers' "total allocation"? The City's expenditure on the services provided is much less than the total amount in the settlement and so it is unclear to us why any provider would be coming close to any upper limit on its budget.

Best,

Stephanie Carroll

Directing Attorney

Consumer Rights & Economic Justice

Tel: 213-385-2977 Ext. 137

Pronouns: she/her

---

**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Monday, November 29, 2021 1:18 PM

**To:** Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan & Stephanie:

I have been working on securing support for an extension since I received your letter. However, as you know, the City does not always make decisions as quickly as we would like.



Here is where we are:

- The City Attorney's Office will submit a recommendation to City Council to extend the benefit program by one year, to June 2023. If approved, funding for the one year extension will most likely be incorporated into the City's fiscal year 2022-2023 budget process. This means we may not know the result until April or May 2022.
- In order to avoid an interruption in benefits, the City will stipulate to extend the application period so that class members can continue to apply for benefits up through the current end of the benefit program in June 2022. Benefits provided to any class member who applies after December 2021 will be subject to the existing resources allocated to the program. This will allow people to continue to apply for and receive benefits while Council decides if it wants to extend the Program, and, if so, the budgeting process by which it will fund the extension.
- If/when Council approves an extension as part of the budget, we can amend the benefit period in the settlement agreement at that time.

Please let me know if you agree with proceeding in this manner.

As to your question about supportive services, I am informed that jobs and training related services are not on pause. Service providers who are nearing their total allocation have been asked to prioritize participant subsidized employment opportunities, training, and educational and employment service requests while additional allocations are being sought. These priorities include supportive services such as transportation, tools, clothing, etc., that will support the participants to meet their program goals. Participants who are employed or are business owners who are only seeking supportives services have been deemed a lesser priority, unless the supportive services are emergency needs. Service providers will continue to assess emergency needs and support the participants as necessary.

Gerardo and Ricardo, copied here, can provide additional information if necessary.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Mon, Nov 29, 2021 at 10:26 AM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Dear Scott,

You indicated in your last email you would present the City's position to us last week, but we have yet to receive an update from you. As Stephanie mentioned, we are concerned at this delay. Please let us know the City's position as soon as possible. Please also provide a response to Stephanie's question below regarding supportive services.

Best,

**Megan Veas**

*(pronouns: she/ her/ hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

---

**From:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>

**Sent:** Thursday, November 18, 2021 10:01 AM

**To:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[olorange@att.net](mailto:olorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** RE: Rodriguez v. City of Los Angeles

Dear Scott,

Thank you for the update. However, we are very concerned at this delay. We first sought an extension and related meet and confer on October 5. It is Thanksgiving next week and December 27, the current deadline for claims, is

looming. As we want to avoid any material interruption in the claims period, this delay leaves us very little time for us to prepare the necessary motion papers to seek an extension. Can you expedite this process and give us more insight into why this delay has occurred?

In addition, we have heard through service providers that “supportive services” i.e. anything not related to jobs and training, are on pause. Can you please explain why this is the case?

Sincerely,

Stephanie Carroll

Directing Attorney

Consumer Rights & Economic Justice

Tel: 213-385-2977 Ext. 137

Pronouns: she/her

---

**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Tuesday, November 16, 2021 8:44 AM

**To:** Megan Vees <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

Thank you for checking in. I should know more by the end of this week and be able to present the City's position to you next week (the week of Nov 22).

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Mon, Nov 15, 2021 at 2:36 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Scott,

It's been about two weeks since your last email, so I'm writing to see if you have any updates.

Thank you,

**Megan Veas**

*(pronouns: she/ her/ hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Tuesday, November 2, 2021 6:13 PM

**To:** Megan Vees <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

I'm happy to meet and confer, but I'm still making inquiries about support for an extension. I propose you give me a couple weeks to see how far I can get.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Tue, Nov 2, 2021 at 4:52 PM Megan Vees <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Scott,

Could you provide an estimated date by which you expect to have a response for us or think you'll be prepared to meet and confer?

Thank you,

**Megan Vees**

*(pronouns: she/ her/ hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)

---

**From:** Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>

**Sent:** Friday, October 22, 2021 1:20 PM

**To:** Megan Vees <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)>

**Cc:** Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>; Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; [ ORANGE ] <[olorange@att.net](mailto:olorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez <[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org); Ricardo Renteria <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

**Subject:** Re: Rodriguez v. City of Los Angeles

Megan:

I wanted to update you that we are continuing to discuss internally. I will let you know when I am in a position to address your request to meet and confer on a possible extension.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Fri, Oct 15, 2021 at 4:44 PM Scott Marcus <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)> wrote:

Megan:

I apologize for the delay. We are still discussing internally, which is taking longer to accomplish these days, but hope to have a response to you soon. Thank you for your patience.

Scott Marcus

Chief Assistant City Attorney

Civil Litigation Branch

Los Angeles City Attorney's Office

200 North Main Street

City Hall East, 7th Floor

Los Angeles, CA 90012

(213) 978-4681

On Fri, Oct 15, 2021 at 4:36 PM Megan Veas <[mvees@publiccounsel.org](mailto:mvees@publiccounsel.org)> wrote:

Dear Scott and Gerardo,

I'm writing to follow up about our letter requesting a meet and confer regarding a further extension. Please let us know by Wednesday Oct. 20 when you are available to meet and confer.

Thank you,

**Megan Veas**

*(pronouns: she/her/hers)*

Staff Attorney – Consumer Rights & Economic Justice

Public Counsel

213.385.2977 x230

[mveas@publiccounsel.org](mailto:mveas@publiccounsel.org)

---

**From:** Megan Veas

**Sent:** Tuesday, October 5, 2021 11:00 AM

**To:** 'Scott Marcus' <[Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)>; Gerardo Ruvalcaba <[gerardo.ruvalcaba@lacity.org](mailto:gerardo.ruvalcaba@lacity.org)>

**Cc:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>; Cindy Panuco <[cpanuco@publiccounsel.org](mailto:cpanuco@publiccounsel.org)>; '[ORANGE ]' <[oluorange@att.net](mailto:oluorange@att.net)>; [dstormer@hadsellstormer.com](mailto:dstormer@hadsellstormer.com); Lupe Sanchez

<[lsanchez@publiccounsel.org](mailto:lsanchez@publiccounsel.org)>; Erika Luna <[eluna@publiccounsel.org](mailto:eluna@publiccounsel.org)>; [regina.mills@lacity.org](mailto:regina.mills@lacity.org);

'Ricardo Renteria' <[ricardo.renteria@lacity.org](mailto:ricardo.renteria@lacity.org)>; 'ari.malka@csun.edu' <[ari.malka@csun.edu](mailto:ari.malka@csun.edu)>

**Subject:** Rodriguez v. City of Los Angeles

Dear Scott and Gerardo,

We hope you are well. Please find attached a letter regarding our request for a further extension of the claims deadline and training program. We are available to meet and confer at your convenience.

Best,

**Megan Veas**

Staff Attorney – Consumer Rights & Economic Justice

*(pronouns: she/her/hers)*





**Public Counsel**

610 South Ardmore Avenue | Los Angeles, CA 90005

213.385.2977 x230 | 213.201.4722 – FAX

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Gerardo Ruvalcaba, Assistant General Manager  
Workforce Development System  
Economic and Workforce Development Department  
Phone: (213) 744-7233  
E-Mail: [Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org)

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Gerardo Ruvalcaba, Assistant General Manager  
Workforce Development System  
Economic and Workforce Development Department  
Phone: (213) 744-7233  
E-Mail: [Gerardo.Ruvalcaba@lacity.org](mailto:Gerardo.Ruvalcaba@lacity.org)

**EXHIBIT UU**

## Ghirlandi Guidetti

---

**From:** Karina Henriquez <karina.henriquez@lacity.org>  
**Sent:** Wednesday, October 11, 2023 10:07 AM  
**To:** Ghirlandi Guidetti  
**Cc:** Juan Romero; Ash Rojo; Suzanne Castillo; Stephanie Carroll; Scott Marcus; Regina Mills  
**Subject:** Re: FW: Larca

Good morning,

Our department is not aware of any class members being turned away. The message to all WSC's has always been to continue to provide case management services to existing and new participants. Juan and I are keeping track of all incoming participants that we have issued acceptance letters to. Even when agencies receive walk-ins, we have instructed them to refer them back to Juan and I so that we can process their claims forms. We are referring new participants to agencies that have capacity.

With [REDACTED] situation, she submitted the information needed to process the request last week. The agency she is enrolled with has been in constant communication with her regarding updates on her previous and current requests.

Take care.

On Fri, Oct 6, 2023 at 9:41 AM Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)> wrote:

Hi Karina and Juan – following up on the email below. (I think Karina may have been inadvertently omitted from Juan's reply).

**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>  
**Sent:** Friday, September 29, 2023 11:06 AM  
**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>  
**Cc:** Ari Malka <[malka.ari@gmail.com](mailto:malka.ari@gmail.com)>; Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>; Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>; Suzanne Castillo <[scastillo@publiccounsel.org](mailto:scastillo@publiccounsel.org)>  
**Subject:** Re: FW: Larca

Hi Stephanie,

I'm including Karina Heriquez from our team since she has had some communication with participant and the service provider she's enrolled in. Thanks again.

On Fri, Sep 29, 2023 at 10:54 AM Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)> wrote:

Dear Juan,

Please can you update us as to what is happening with this? This class member asked for assistance back in July (maybe even earlier). Your response below is now itself a month old. Why are our class members being kept waiting like this when the extension was approved many months ago? We have been assured many times by the City that budget delays like this are one offs and a thing of the past but yet they keep happening. This is incredibly frustrating. Please get back to me as soon as possible.

Stephanie Carroll

Directing Attorney

Consumer Rights & Economic Justice

Tel: 213-637-3837

Pronouns: she/her/hers

---

**From:** Ash Rojo <[arojo@publiccounsel.org](mailto:arojo@publiccounsel.org)>  
**Sent:** Friday, September 29, 2023 10:44 AM  
**To:** Stephanie Carroll <[scarroll@publiccounsel.org](mailto:scarroll@publiccounsel.org)>  
**Cc:** Ghirlandi Guidetti <[gguidetti@publiccounsel.org](mailto:gguidetti@publiccounsel.org)>  
**Subject:** Fwd: Larca

FYI

----- Forwarded Message -----

**From:** [REDACTED]

**To:** [REDACTED]

**Sent:** Wednesday, September 27, 2023 at 11:16:27 PM MST

**Subject:** Fwd: Larca

Sent from my iPhone

Begin forwarded message:

**From:** Juan Romero <[juan.romero@lacity.org](mailto:juan.romero@lacity.org)>  
**Date:** August 31, 2023 at 9:56:24 AM MST  
**To:** [REDACTED], Karina Henriquez  
<[karina.henriquez@lacity.org](mailto:karina.henriquez@lacity.org)>  
**Subject:** Re: Larca

Good morning [REDACTED],

Thank you for reaching out to us! All of our service providers are waiting to renew their Program Year 23-24 Contracts. Goodwill is aware of your childcare request and as soon as we finalize this process they will notify you and submit your request to us. Thanks again

On Thu, Aug 31, 2023 at 7:56 AM [REDACTED] <[REDACTED]> wrote:

I am a member of the class action and it's been such a hassle trying to get the benefits that I am entitled to. They say that there is so much money but when we try to access the benefits they give us the run around . I have been waiting on my reimbursement for my childcare for months and they tell me that they are waiting for the new contract. I'm low income family and in these hard times it's stressful having to wait so long. Why do they have us waiting if the money is there. Please let me know how we can speed up this process.

Thank you

[REDACTED]  
Sent from my iPhone

--

Juan Romero

LARCA Program

Sr. Project Coordinator

Economic and Workforce Development Department

1200 W. 7th St, 6th floor

Los Angeles, CA 90017

(213) 744-9709 wk

(213) 219-4027 cell

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[juan.romero@lacity.org](mailto:juan.romero@lacity.org)

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

--

Juan Romero

LARCA Program

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--

Karina Henriquez  
Senior Project Assistant  
City of Los Angeles,  
Economic & Workforce Development Department  
1200 West 7th Street  
Los Angeles, CA 90017  
Work cell: 213.663.3718

*"A leader sees GREATNESS in other people.  
She or He can't be much of a leader  
if all he or she sees are themselves"-Maya Angelou-*



**EXHIBIT VV**



The nation's largest pro bono law firm

March 29, 2023

Los Angeles City Council  
Budget and Finance Committee  
200 North Spring Street  
Los Angeles, CA 90012

*Sent via electronic mail*

**Re: CF 17-0026-S1 Rodriguez Settlement Agreement Modification**

Dear Chair Blumenfield and Budget and Finance Committee members,

Public Counsel is class counsel in the Rodriguez case and we have been monitoring the City's implementation of the settlement over the past several years. The motion introduced by Councilmembers Eunisses Hernandez and Tim McOsker, as amended to allocate a further \$10m to class members, represents a genuine attempt to make good on the spirit of the settlement by providing real, targeted resources to class members to make amends for the unconstitutional gang injunctions to which they were subjected. It also provides a real chance to engage with class members and assist them in seizing opportunities that will allow them to provide for themselves, their families and their communities

We write to: (1) alert you to **major discrepancies in the spending reported** to date on settlement implementation; and (2) voice our recommendations for the path forward.

### **Budget Discrepancies**

According to the January 9, 2023, Request to Allocate an Additional \$2.75m to the Rodriguez Settlement Program ("EWDD Request," enclosed as Attachment 1), of approximately \$10m allocated to service providers, around \$8m had been spent and \$2m remained to be spent through June 2023. The same request stated that the City had appropriated \$13.3m from FY 2016/17 through FY 22/23, of which \$3.29m was for "EWDD Oversight." The March 9, 2023, Report From the Office of the City Administrative Officer re: EWDD's request (enclosed as Attachment 2) projected spending on the settlement through February 2023 at \$12,069,506.

As Class Counsel we have received spending reports on two occasions that break down the spending against individual class members by Worksource Center, along with other sundry expenses by some of the Worksource Centers. The first, provided by the then Senior Project Coordinator Ricardo Renteria on April 20, 2022, detailed a total amount spent of \$5,426,067.25. The second report, provided by the new Senior Project Coordinator Juan Romero on February 14, 2023, detailed a total amount spent of \$6,505,251.84. In other words, reports submitted to



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class counsel regarding settlement implementation account for only half the \$12m the CAO estimates having been spent. We are very concerned about this large discrepancy and would appreciate a full reconciliation of amounts spent as soon as practicable.

In addition, the settlement itself (of relevance here, “Exhibit B” is enclosed as Attachment 3) states, under the title “Financial Commitment to the Class” that the “[a]dministrative costs for the Jobs and Education Program...will not exceed 10% of the total annual expenditures.” Based on EWDD’s Request, and leaving aside the discrepancies pointed out above that might, once reconciled, lay bare an even worse scenario, it appears that, to date, administrative costs represent 25% of the total expenditure. To the extent EWDD’s Request is accurate, this violates the current settlement agreement. We are very concerned about the possibility that class members have been denied significant resources owed to them under the terms of the settlement.

Based on the foregoing we recommend:

- **Recommendation 1:** Provide a detailed analysis and reconciliation of the various figures presented so far to account precisely for the amounts spent on class members, the amounts spent on administration, and the amounts spent on anything else that have been attributed (correctly or incorrectly) to the settlement; and
- **Recommendation 2:** Ensure that no more than 10% of any spending to cover the City’s administrative expenses should attributed to the settlement.

### **Support for the Amended Motion to Extend the Settlement as a Runway to Build a Broader City Program**

In addition, we believe that allocating a further \$10m in spending over the next two financial years as envisioned in the amended motion presented to the City Council on Friday March 24, would go a long way to fulfill the intent of the settlement to provide necessary resources and services, save lives, and restore faith in the City. We believe it is important to extend the current settlement and build in clear guidelines and policies for its implementation for the court to approve, and to which class counsel and the court can hold the City accountable. To further this aim we would urge the City to mandate quarterly meetings to include class counsel and CD1 to review and report back on implementation.

We are also in support of the idea discussed during the Council meeting for the City to commit to, and build, a program that would extend beyond current settlement class members and reach all folks wrongly criminalized through the use of gang injunctions in the City. The extension of the settlement should act as a runway towards a permanent City program to engage this population and help them forge new lives for themselves and their families and to enrich their communities.



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As such we further recommend:

- **Recommendation 3:** Allocate the \$10m envisioned by the amended motion to be spent on the four-fifths of class members not yet reached by the settlement, and offer the range of services envisioned by the motion including assistance with housing, utilities, food etc;
- **Recommendation 4:** Request the City Attorney to meet with class counsel to create transparent and clear policies so that class members understand their entitlements under the amended settlement;
- **Recommendation 5:** Mandate quarterly meetings with class counsel and CD1 to assess, and report back on, implementation;
- **Recommendation 6:** Use those quarterly meetings to design and recommend a permanent City program to assist those formerly associated with gangs or served with gang injunctions.

We thank the Committee members for your consideration and urge the Council's decisive and swift adoption of the motion and our recommendations.

Sincerely,

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213285-2977 ext. 137  
scarroll@publiccounsel.org

To: Councilmember Blumenfield: [Councilmember.Blumenfield@lacity.org](mailto:Councilmember.Blumenfield@lacity.org)  
Councilmember Price: [councilmember.price@lacity.org](mailto:councilmember.price@lacity.org); Marisa Alcaraz:  
[marisa.alcaraz@lacity.org](mailto:marisa.alcaraz@lacity.org)  
Councilmember Yaroslowsky: [councilmember.Yaroslowsky@lacity.org](mailto:councilmember.Yaroslowsky@lacity.org)  
Councilmember McCosker: [councilmember.mcosker@lacity.org](mailto:councilmember.mcosker@lacity.org)  
Councilmember Rodriguez: [councilmember.rodriguez@lacity.org](mailto:councilmember.rodriguez@lacity.org)



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cc. Councilmember Eunnisses Hernandez: [jose.a.rodriquez@lacity.org](mailto:jose.a.rodriquez@lacity.org)  
Mayor Karen Bass: [karren.lane@lacity.org](mailto:karren.lane@lacity.org); [brenda.shockley@lacity.org](mailto:brenda.shockley@lacity.org)  
Scott Marcus, City Attorney: [Scott.Marcus@lacity.org](mailto:Scott.Marcus@lacity.org)

# **ATTACHMENT 1**

# CITY OF LOS ANGELES

CALIFORNIA

CAROLYN M. HULL  
GENERAL MANAGER

**ECONOMIC AND WORKFORCE  
DEVELOPMENT DEPARTMENT**

1200 W. 7<sup>TH</sup> STREET  
LOS ANGELES, CA 90017



KAREN BASS  
MAYOR

January 9, 2023

Council File Number:  
Council Districts: All  
Contact Persons & Phone:  
Gerardo Ruvalcaba (213) 744-7233

The Honorable Karen Bass  
Mayor, City of Los Angeles  
Room 303, City Hall

City Council  
c/o City Clerk  
Room 395, City Hall

Attention: Heleen Ramirez, Legislative Coordinator

**TRANSMITTAL: APPROVAL OF REQUEST FROM THE ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT (EWDD) TO ALLOCATE \$2.75 MILLION TO THE GANG INJUNCTION CURFEW (RODRIGUEZ) SETTLEMENT PROGRAM**

**RECOMMENDATIONS**

The General Manager of the Economic and Workforce Development Department (Department) respectfully requests that the City Council:

1. APPROVE the Department's recommendation to allocate \$2.75 million in additional funding to the Gang Injunction Curfew Settlement program, as follows:

a.	Service Providers	2,500,000
b.	City Costs	250,000
c.	Total	2,750,000

2. APPROVE the Department's recommended service provider allocations as outlined in Table 3;
3. AUTHORIZE the Department to amend agreements as outlined in Table 3 through June 27, 2023.

4. Authorize the Controller to:

- a. Transfer \$2.75 million from the City General Purpose Fund and/or the Unappropriated Balance to the Gang Injunction Curfew Settlement Fund No. 10B.
- b. Establish new within the Gang Injunction Curfew Settlement Fund No. 10B and appropriate as follows

Account	Title	Amount
22W122	Economic and Workforce Development	270,214
22W166	Personnel	4,786
22W887	Gang Injunction Curfew Settlement-City GF	2,475,000
<b>Total</b>		<b>2,750,000</b>

- c. Increase appropriations within Fund 100/22 as follows:

Account	Title	Amount
001010	Salaries General	200,885
001070	Salaries as Needed	11,208
001090	Overtime General	9,863
002120	Printing and Binding	27
002130	Travel	56
003040	Contractual Services	4,551
003310	Transportation	5
006010	Office and Administrative	3,869
006020	Operating Supplies	5
006030	Leasing	39,745
<b>Total</b>		<b>270,214</b>

- d. Increase appropriations within Fund 100/66 as follows:

Fund/Account	Title	Amount
001010	Salaries General	4,786

- 5. Authorize the General Manager of EWDD, or designee, to prepare Controller Instructions for any necessary technical adjustments, subject to the approval of the City Administrative Officer, and then instruct the Controller to implement the instructions.

**FISCAL IMPACT**

The recommendations contained herein will have an impact on the City General Purpose Fund through an increased appropriation of \$2.75 million for the Gang Injunction Curfew Settlement program (also known as LARCA 2.0).

**BACKGROUND**

The City Council allocated a maximum of \$30 million dollars in City General Purpose Funds over a four-year period for the Gang Injunction Curfew Settlement (Settlement) in the case of “Rodriguez vs. City of Los Angeles.” Approximately 6,000 plaintiff class members were impacted by the Settlement, which included twenty-six (26) gang injunction areas: 3 in the San Fernando Valley, 3 in West Los Angeles, 4 in Northeast Los



Angeles, 4 in Boyle Heights/East Los Angeles, 2 in Mid-City, 3 in Hollywood/Central Los Angeles, 6 in South Los Angeles, and 1 in Wilmington/Harbor.

The LARCA 2.0 incorporates best practice workforce development designs from the original LARCA model that targeted high-need and transitional populations and provided them education and career assessments, case management services, job readiness training, subsidized employment, financial literacy training and job placement services.

**DISCUSSION**

Since the inception of the program, City Council has appropriated a total of \$13.3 million from the \$30.0 million maximum allocation. Though the City committed to a maximum of \$7.5 million per year, the City only appropriated a portion of the total annual commitment to EWDD with the balance of funds appropriated in the Unappropriated Balance (UB) Budget. As a result, only \$13,301,863 of the original \$30.0 million have been made available to the program to date. Table 1 below provides a summary of funding appropriated by Fiscal Year:

**Table 1: Appropriations by Fiscal Year**

No.	Fiscal Year	Service Providers	EWDD Oversight	Total
1	FY2016-17	1,910,000	155,494	2,065,494
2	FY2017-18	2,030,259	596,807	2,627,066
3	FY2018-19	2,744,308	528,732	3,273,040
4	FY2019-20	374,054	689,474	1,063,528
5	FY2020-21	452,173	672,827	1,125,000
6	FY2021-22	2,500,000	359,303	2,859,303
7	FY 2022-23	0	288,432	288,432
<b>Total</b>		<b>10,010,794</b>	<b>3,291,069</b>	<b>13,301,863</b>

The Department’s ongoing community outreach efforts and “word of mouth” referrals in impacted communities continue to lead to significant increase in program enrollments. To date, the LARCA program has now enrolled a total of 987 participants, with 486 or 49 percent of all enrollments coming from PY 2020-2021 and PY 2021-2022. With five months left in the enrollment period, EWDD anticipates an additional 200 enrollments by the end of the program period, June 27, 2023. Table 2 below provides a summary of actual participant enrollments by Fiscal Year.

**Table 2: Enrollments**

No.	Fiscal Year	Total Enrollments
1	FY2016-2017	0
2	FY2017-2018	110
3	FY2018-2019	254
4	FY2019-2020	103
5	FY2020-2021	274
6	FY2021-2022	212
7	FY 2022-2023	34
<b>Total</b>		<b>987</b>

Based on pending invoices, service provider expenditures will surpass \$8 million by November 2022, leaving approximately \$2.0 million available through June 27, 2023. EWDD projects an additional \$2.75 million in expenditures through the end of the current program. In order to avoid disruption of services, EWDD is requesting that City Council authorize an additional \$2.75 million to successfully close-out the program. Furthermore, EWDD recommends that the \$2.75 million be distributed as outlined in Table 3:

**Table 3: Proposed Allocations**

	<b>Contractor</b>	<b>Current Funding</b>	<b>Total Invoiced to Date</b>	<b>Current Balance</b>	<b>New Allocation</b>	<b>Total</b>
1	Anti-Recidivism Coalition	0	0	0	0	0
2	Arbor E&T, LLC - Boyle Heights	22,099	22,099	0	0	22,099
3	Arbor E&T, LLC - Canoga Park	1,078,000	874,175	203,825	300,000	1,378,000
4	Asian American Drug Abuse Program, Inc.	855,644	702,355	153,289	200,000	1,055,644
5	Build Rehabilitation Industries	11,635	11,635	0	0	11,635
6	Catholic Charities	500,070	357,519	142,551	200,000	700,070
7	City of Long Beach (Pacific Gateway)	593,000	424,312	168,688	200,000	793,000
8	Coalition for Responsible Community Development	150,000	45,504	104,496	0	150,000
9	Community Career Development, Inc.	115,000	54,751	60,249	100,000	215,000
10	Downtown Women's Center	160,000	52,257	107,743	100,000	260,000
11	El Proyecto del Barrio, Inc.	480,000	404,586	75,414	300,000	780,000
12	Friends Outside in Los Angeles County	21,356	21,356	0	0	21,356
13	Goodwill Industries of Southern California	959,700	827,980	131,720	300,000	1,259,700
14	Homeboy Industries	177,604	177,604	0	0	177,604
15	Housing Authority of the City of Los Angeles	2,119,529	1,587,925	531,604	0	2,119,529

16	Jewish Vocational Service	275,000	216,110	58,890	200,000	475,000
17	Los Angeles Conservation Corps, Inc.	31,753	29,900	1,853	0	31,753
18	Managed Career Solutions, Inc.	738,000	781,494	(43,494)	300,000	1,038,000
19	Pacific Asian Consortium in Employment	426,736	302,188	124,548	200,000	626,736
20	UAW-Labor Employment and Training Corporation	265,000	138,697	126,303	100,000	365,000
21	Watts Labor Community Action Committee	20,938	20,938	0	0	20,938
22	Youth Policy Institute, Inc.	0	0	0	0	0
23	H.E.L.P.E.R Foundation	100,000	100,000	0	0	100,000
24	Homeboy Industries (Tattoo Removal)	50,000	28,024	21,976	0	50,000
25	CSUN Evaluation Services	664,259	586,409	77,850	0	664,259
26	Professional Development: Homeboy Industries	20,000	13,413	6,587	0	20,000
27	Professional Development: HELPER Foundation	20,000	18,857	1,143	0	20,000
28	Outreach & Marketing	155,471	155,471	0	0	155,471
<b>Total</b>		<b>10,010,794</b>	<b>7,955,559</b>	<b>2,055,235</b>	<b>2,500,000</b>	<b>12,510,794</b>

*Carolyn Hull*  
 CAROLYN M. HULL  
 General Manager

*Charles Woo*  
 CHARLES WOO, Chief  
 Workforce Development Board

CMH:GR:RR:cg

# **ATTACHMENT 2**

REPORT FROM

## OFFICE OF THE CITY ADMINISTRATIVE OFFICER

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Date: March 9, 2023

CAO File No. 0220-05667-0002

Council File No. 16-0081-S3

Council District: All

To: The Council  
The Mayor

From: *for* Matthew W. Szabo, City Administrative Officer 

Reference: Economic and Workforce Development Department Transmittal dated January 9, 2023; additional information received through March 6, 2023

Subject: **REQUEST FROM THE ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT TO ALLOCATE \$2.75 MILLION TO THE GANG INJUNCTION CURFEW SETTLEMENT PROGRAM FOR FISCAL YEAR 2022-23**

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### RECOMMENDATIONS

That the Council, subject to the approval of the Mayor:

1. NOTE AND FILE the transmittal from the Economic and Workforce Development Department dated January 9, 2023; and
2. INSTRUCT the General Manager of the Economic and Workforce Development Department, or designee, to report any available savings or additional funding need for the Gang Injunction Curfew Settlement Agreement after the program ends on June 27, 2023.

### SUMMARY

The Gang Injunction Curfew Settlement Agreement (GICSA) (C.F. 16-0081) was executed and approved by the federal court in April 2017. The GICSA obligated the City, through the Economic and Workforce Development Department (EWDD), to provide a variety of work-readiness and employment services over four years to help prepare members of the impacted plaintiff class (or their qualifying designees) to enter the workforce. The number of potentially qualifying participants is approximately 6,000. The City was required to expend a minimum of \$1.125 million to a maximum of \$7.5 million each year for four years to provide jobs, education, and tattoo removal services. EWDD's program design incorporates best practices from a previous workforce development program known as the Los Angeles Reconnections Academy (LARCA), which includes education and career assessments, case management services, job readiness training, subsidized employment, financial literacy training, and job placement services. In June 2017, as part of the Program Year 2017-18 Workforce Development Board Annual Plan, the Council and Mayor

approved authority for EWDD to procure service providers and negotiate and execute agreements to implement City services under the legally-mandated GICSA (C.F. 17-0635). From Fiscal Year (FY) 2016-17 to date, the City has provided a total of \$13,181,689 from the General Fund to implement the GICSA.

The EWDD transmittal dated January 9, 2023 requests an additional \$2.75 million in funding to meet anticipated needs through June 27, 2023. It should be noted that although the EWDD report references a \$30 million maximum allocation appropriated by Council, there is no funding in the FY 2022-23 Adopted Budget for this purpose. Instead, it was the Council’s instruction for EWDD to expend no less than \$4.5 million and no more than \$30 million over the four-year settlement period. There is no funding reserved in the Unappropriated Balance for this purpose since the end of the original settlement period in June 2021, when the City satisfied its obligations under the GICSA. Approval of EWDD’s interim request would have a \$2.75 million General Fund impact.

The original GICSA program operated from June 1, 2017 to June 27, 2021. The program has been extended three times: from June 27, 2021 through December 27, 2021, from December 27, 2021 through June 27, 2022, and finally, from June 27, 2022 through June 27, 2023 (C.F. 17-0026). Potential participants have until March 27, 2023 to enroll under the agreement, and the contracted services performed under the program will end on June 27, 2023. EWDD has not requested that Council extend the GICSA program beyond the June 27, 2023 expiration date; and has not submitted a budget request for any funding or positions for FY 2023-24.

EWDD reimburses contractual expenses following the receipt and processing of invoices, and expends from the balance of funds on a rolling basis. In December 2021, the EWDD reported an ongoing increase in enrollments and corresponding expenditures, and requested \$2.75 million to meet projected funding needs through the end of the second approved program extension (through June 27, 2022). The Council and Mayor approved this funding in April 2022, and instructed that any uncommitted funds that were available at the close of June 2022 be used to support funding needs for the third program extension period, from June 27, 2022 through June 27, 2023 (C.F. 16-0081-S3). The EWDD transmittal dated January 9, 2023 anticipates over 200 additional enrollments by March 27, 2023, and an additional cost of \$2.75 million to avoid disruption of services through the end of the third extension period. The following table summarizes enrollments and expenses by FY for the GICSA Program. Program expenses include expenses reported in this Office’s February 2022 report, plus additional “pending invoices” as reported by EWDD to the CAO in February 2023. The enrollment figures also reflect the most recent data available from EWDD through February 2023. Based on the EWDD transmittal, historical data, and supplemental information received from EWDD, this Office anticipates no more than 30 additional enrollments by the March 27, 2023 enrollment deadline, or 114 total participants in FY 2022-23.

<b>Fiscal Year</b>	<b>Enrollments</b>	<b>Program Expenses</b>
2016-17	0	\$1,592,536
2017-18	110	1,981,475
2018-19	254	1,799,329
2019-20	103	1,200,211
2020-21	274	3,639,445

2021-22	212	1,790,196
2022-23*	84	66,314
<b>Total</b>	<b>1,037</b>	<b>\$12,069,506</b>

\*Data through February 28, 2023.

EWDD estimated that the additional funding requested in the January 9, 2023 transmittal would allow the program to enroll up to 200 participants in this final program year, and estimated the total program cost for 2022-23 at \$1.8 million using that enrollment level. This Office does not recommend providing additional funding to this program at this time since there is less than one month remaining for enrollments and less than three months remaining for program operations. This Office projects total expenses of approximately \$1.14 million for FY 2022-23 utilizing a projected enrollment of no more than 114 participants. This estimate brings the total anticipated program expenditures to \$13,143,192<sup>1</sup>, which is less than the total General Fund allocation to date of \$13,181,689. As such, this Office determined there is sufficient funding for the program at this time.

EWDD states that there is a significant backlog of pending invoices for this program that contribute to the estimated higher funding need. This Office was unable to verify expenditure estimates exceeding the \$13,181,689 General Fund allocation to date. EWDD currently has approximately \$2.4 million in encumbered funds available within the Gang Injunction Settlement Fund to pay down invoices on the existing contracts under this program, and approximately \$650,000 in uncommitted funds within that Fund that could be utilized for additional expenses or needs related to the program. This Office does not recommend any additional funding allocation at this time. Given the imminent expiration of the program, it is recommended that EWDD report back with any additional funding needed to satisfy any outstanding invoices and complete the program close-out after June 27, 2023.

## FISCAL IMPACT STATEMENT

The recommendations stated in this report will have no impact to the General Fund. Approval of the request for funding by the Economic and Workforce Development Department (EWDD) as stated in the January 9, 2023 transmittal would have a \$2.75 million impact to the General Fund. The 2022-23 Adopted Budget did not allocate any funding to the Gang Injunction Settlement Program in either the General City Purposes budget or the Unappropriated Balance. Should the Council approve additional funding needs, this will impact the 2022-23 Unappropriated Balance.

## FINANCIAL POLICIES STATEMENT

The recommendations stated in this report comply with the City's Financial Policies inasmuch as the Unappropriated Balance, Reserve for Mid-Year Adjustments, is used to address shortfalls that arise during the year. Additionally, changes to budget appropriations during the fiscal year shall be limited and subject to the review and approval of the Mayor and the City Council.

MWS:SRB:02230063

<sup>1</sup> The estimate is based on an average cost of \$10,000 per participant in 2022-23.

# **ATTACHMENT 3**



**Exhibit B to Settlement Agreement**  
**Rodriguez v. City of Los Angeles**  
**CV11-01135 DMG (PJWx)**

**I. Summary of Jobs and Education Program**

The City of Los Angeles (“City”) will fund, up to \$7.5 million per year for four years, a job training and readiness program (“Jobs and Education Program”) available exclusively to Settlement Class Members. Participants will receive education, skills training, career counseling, and subsidized employment through agencies contracted to administer the Jobs and Education Program under the oversight of the Economic & Workforce Development Department (“EWDD”). The Jobs and Education Program will also be reviewed annually by a third-party evaluator to ensure it is providing appropriate services to Class Members.

**II. Financial Commitment to the Class**

The City of Los Angeles (“City”) will pay a minimum of \$1.125 million per year up to a maximum of \$7.5 million per year to fund the Jobs and Education Program for a period of four years. The average estimated expenditure per participant is approximately \$10,000. Administrative costs for the Jobs and Education Program are included in the total minimum and maximum contributions; however, they will not exceed 10% of the total annual expenditures. The remaining 90% will be allocated toward the community organizations that are authorized WorkSource, YouthSource, and LA:Rise providers and that will be providing the services described below, including the salaries provided to class members in Phase IV below. (The current lists of providers are attached as Appendix 1 and include Chrysalis Enterprises, Downtown Women’s Center, Homeboy Industries, and others. Additional providers may be eligible to provide services if they are approved through the City’s RFQ process).

The City will also pay up to \$150,000 per year for free tattoo removal for Settlement Class Members. This \$150,000 is not counted towards the \$1.125 million annual minimum Jobs and Education Program funding, but will be counted toward the \$7.5 million maximum contribution.

**III. Eligibility**

The Jobs and Education Program will be available to Settlement Class Members on a first-come, first-served basis until the City’s Financial Commitment is exhausted. Those Settlement Class Members who cannot participate due to incarceration or

**Exhibit B to Settlement Agreement**  
**Rodriguez v. City of Los Angeles**  
**CV11-01135 DMG (PJWx)**

full time employment may designate one first- or second-degree relative (parent, child, sibling, spouse, cousin, aunt, uncle, nephew, or niece) to participate in the program. First-degree relatives will receive the same priority as class members. Second-degree relatives will be provided with the program if the City's minimum annual contribution has not already been reached on a first-come, first-served basis until the minimum annual contribution has been reached.

Any Settlement Class Member, regardless of his or her citizenship, is eligible to participate in the Jobs and Education Program, but federal right-to-work requirements will apply to any employment opportunity arising out of the Jobs and Education Program. With the exception of Phases IV and VI, all programs and services, such as education, training, or entrepreneurship classes, will be available to Settlement Class Members who do not meet federal right-to-work requirements. Participants will need to provide only one type of government-issued identification, such as a social security card, driver's license, California ID, passport, school ID, or other form of identification.

**IV. Jobs and Education Program Phases**

Participants will receive educational and career assessments, case management services, necessary classroom education, classroom job-readiness training, subsidized employment, and job placement services. The goal is to provide each participant a career pathway program linked to jobs with either the City of Los Angeles or the private sector. The program focuses on customer choice—participants will be encouraged to prepare for and apply for positions they are interested in. The program's goal is to place participants in permanent employment and it aims to achieve a 70% placement rate across all participants.

Education and job training will be conducted by an array of experienced, professional training providers including LAUSD, the LA Community College District ("LACCD"), and certified public and private training providers on the state Employment and Training Provider List. Assessments, case management, and job placement will be handled by WorkSource, YouthSource, and LA:Rise. (The current lists of WorkSource, YouthSource, and LA:Rise providers are attached as Appendix 1.). EWDD will provide continuing professional development training to all providers by a mutually agreeable provider, including cultural competencies and specific case management training, to help them provide quality services to the Settlement Class.

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**Phase I**

The program will recognize that Class Members or their designees are on a spectrum from job-ready, skilled workers (the “Fast Track” group) to persons who require additional education, training, and other work-readiness skills before being meaningfully employed (the “Back on Track” group). All participants will be assessed for placement into one of these groups and provided an orientation to the program.

Participants will select a WorkSource, YouthSource, or LA: Rise provider that will serve as the primary provider for Program services. Upon entry and completion of orientation, participants will work with their provider’s career coaches to review a menu of services from which they will select services and career pathways. Again, the focus is customer choice. Assessment will take into account academic history, behavior, social and emotional needs, family dynamics, and community history. The result will be a specially tailored, participant-centered Service Plan that includes periodic action goals and case management services such as job search assistance, tutoring, formal education, and job retention support.

The Fast Track group will be evaluated for suitability for currently available City jobs or provided supportive services, including job placement services and counseling, to assist with private sector employment. Members of this group can skip to Phase IV and be matched with an appropriate non-profit entity for initial employment. Members of the Fast Track group will have access to up to \$1,000 of supportive services funds to address barriers preventing entry into the workforce or retention of current employment (such as license or certificate fees, or stipends for job-related specialized apparel, tools, or transportation, etc.). Supportive services funds will also be available for those currently working but who want to “upgrade” their skills for potential promotion or new job.

The Back on Track group will participate in Phases II-V described below, receiving secondary or post-secondary education and training in areas necessary for their chosen employment. Based on need, participants will also receive tutoring, study-skills training, and/or instruction leading to completion of secondary school, a certificate program geared to address basic skills deficiencies and develop job readiness, or a community college or Cal State degree. Members of this group will receive a stipend in the amount of \$500 upon successful completion of the Phase II, and \$500 upon successful completion of Phase III.

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**Phase II**

In Phase II, participants will receive educational support services, including tutoring, study skills, basic skills remediation, ESL support, financial and academic preparation services, and literacy and numeracy skills development. These services will be provided by skilled professional providers including LAUSD and LACCD, as appropriate. This includes counseling, case management, adult education, computer literacy, multi-benefit screening, parenting education, tutoring and enrichment, and legal assistance that may include assistance seeking expungement. Additionally, participants will be assisted in creating and obtaining documentation to serve as evidence of rehabilitation and maturing for the purpose of obtaining City employment. See Policies of the Personnel Department, City of Los Angeles, Section 1.3(b).

**Phase III**

In Phase III, participants will receive contextual basic and work readiness skills for specific careers identified in the evaluation process. Occupational careers training could include programs in transportation (hybrid and electric car repair), construction (weatherization), health care (certified nurse assistant, home health aide, pharmacy technician, and medical coding and billing specialist), and other occupations. Industry-standard certifications will be offered, making these transferable skills.

As set forth in their Service Plans, participants on specific career pathway programs will be offered community college opportunities. Most training classes are for credit and are applicable toward degree requirements. In addition, EWDD has a strong relationship with LAUSD, charter schools, and alternative education providers, and participants will be provided with services from those providers as appropriate. Tuition costs, including LAUSD, LACCD, and Cal State tuition, will be covered as Program expenses after all other financial aid grants and scholarship awards are applied.

**Phase IV**

Upon achieving employment ready status, participants will be placed with a non-profit entity that, in turn, will arrange a job with an employer in the relevant field. The non-profit entity will pay the participant's salary and continue to provide supportive services while the participant works for the outside employer.

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Each participant will receive up to 400 hours of City-subsidized employment at the City's minimum hourly wage. At the end of the 400 hours, the expectation is that the participant will be hired by the employer in regular, non-subsidized employment. If the employer does not offer the participant regular, non-subsidized employment, the participant will be offered job placement assistance and evaluated for eligibility for City and/or private sector employment, if appropriate. In addition, each individual completing the program will receive a certificate verifying key job readiness skills.

Career coaches and counselors will provide continuous support during the initial employment with the non-profit entity, including intensive on-the-job coaching and follow-up, to ensure job retention.

**Phase V**

All participants will be provided with a financial literacy course addressing the fundamentals of budget management, saving, credit counseling, and introduction to available financial management tools.

**Phase VI**

Those who complete subsidized work opportunities will be referred to City and other public sector employment opportunities including local targeted hiring programs, apprentice programs and vocational programs. If selected through a competitive employment process, these alternative pathway programs provide trainee opportunities leading to full-time civil service positions.

If the employer from Phase IV does not hire the participant for regular employment, full-time job counselors work with participants to identify part-time and full-time private sector employment opportunities.

**Follow-Up**

All participants who transition to regular employment will receive follow-up counseling services to address any transitional issues for up to 18 months after placement.

**Customer Service**

Quality service is a high priority in this Jobs and Education Program. In addition to the monitoring and quality assurance procedures already in place, EWDD will assign a senior project manager to act as an ombudsman exclusively for this Jobs and Education Program. Every participant will also be provided with an "800"

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number and email address, so that any Class Member may immediately report any problems to the ombudsman or to the senior management at EWDD.

**Annual Review**

The Jobs and Education Program will be reviewed by a third-party evaluator from California State University, Northridge to evaluate the progress of the program and identify any issues related to implementation. The third-party evaluation will include interviews and independent review of enrollment, participant utilization, and employment placement data. A successful program will assist at least 70% of participants in obtaining permanent employment. An annual report will be produced in each of the four years of the program and provided to counsel for the City and for the Class. Any material changes the evaluators propose to make to the program (i.e., changes to the basic structure of the program and/or types of services provided) must be approved by counsel for both the Class and the City before they may be implemented. The cost of this review is included in the Jobs and Education Program's administrative budget.

**Certificates of Participation**

Each participant in the Jobs and Education Program will be provided a certificate upon request that indicates his or her enrollment in the program and the dates, times and location of the program site ("Certificate of Participation"). All Los Angeles Police Officers and Los Angeles Deputy City Attorneys whose duties include enforcement or prosecution of gang injunctions will be advised of the Jobs and Education Program and of the fact that the program is issuing Certificates of Participation for the purpose of informing their exercise of discretion in making gang injunction arrests and/or prosecutions. This advisement will be made on at least an annual basis during the four-year period the program is in effect.

However, this agreement does not require any law enforcement officer or prosecutor who is presented with a Certificate of Participation to exercise his or her discretion to release an individual who is detained for violating a gang injunction, or to decline to prosecute any individual, except that no detention or arrest will be made for violation of the "association provision" of any gang injunction while any individual is attending any of the services described above. Nor will a Certificate of Participation constitute a defense in any criminal or civil matter.

**V. Excess Funds**

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In the event the Jobs and Education Program does not require the minimum annual contribution after serving the Settlement Class and designees as outlined in the Eligibility section above, the remainder of the \$1.125 million minimum annual contribution (“Excess Funds”) will be allocated as follows:

At the end of the first two years of the program, the Excess Funds from each of the first two years will be aggregated and distributed in equal parts to up to six non-profit organizations, up to three selected by the City and up to three selected by Plaintiffs’ counsel other than Public Counsel. Any organization selected must both (1) be included on the City’s then-current list of entities that have been approved following a Request for Qualifications (“RFQ”); and (2) have as its primary purpose the provision of educational and/or job readiness services.

The same procedure will be followed at the end of the four-year program term for distribution of any Excess Funds from the third and fourth years of the program.

Should Plaintiffs wish to designate any organization for receipt of Excess Funds that is not already on the RFQ list, Plaintiffs’ counsel must submit the name and address of the organization to counsel for the City for evaluation no later than six months prior to the time Excess Funds will be distributed. Such organizations, if they qualify for the RFQ list pursuant to this process and have as their primary purpose the provision of educational and/or job readiness services, will be eligible to receive Excess Funds under this provision.

**EXHIBIT WW**



**McMahon, Robert**

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**From:** Stephanie Carroll  
**Sent:** Tuesday, May 16, 2023 6:58 AM  
**To:** Scott Marcus  
**Cc:** Regina Mills; Kathryn Eidmann; Ghirlandi Guidetti; Olu Orange; Dan Stormer (dstormer@hadsellstormer.com)  
**Subject:** Request to Meet and Confer Regarding Administrative Expenses and Stipulation  
**Attachments:** 2023 03 29 Ltr to Budget Committee re Rodriguez Settlement Extension with attachments.pdf; 2023 02 06 Request to Meet & Confer Regarding Further Stipulation and Budgets.pdf

Scott,

Class counsel request to meet and confer regarding accounting discrepancies in various settlement-related reports that lead us to believe the City is exceeding the ten percent limit on administrative expenses. As you know, we raised this concern in our February 6, 2023 email to you and in our March 29, 2023 letter to the committee on Budget, Finance, and Innovation. For your convenience, we have re-attached those communications here.

Please let us know when you are able to meet between now and Thursday, May 18. While we hope that a formal motion to enforce the settlement agreement will not be necessary, a meet and confer this week is necessary to preserve Plaintiffs' right to file such a motion before the current expiration of the settlement agreement on June 27, 2023.

In the alternative, if the City is willing to stipulate to extend the settlement agreement in light of the City's agreement in principle to provide additional, future funding for the benefit of the Rodriguez class members, this would give the parties additional time to work together to resolve these issues without the need for immediate court involvement.

Please let us know your availability for a meet and confer on these issues. If convenient, our team is available on Thursday, 5/18 from noon-2:00 p.m.

Sincerely,

Stephanie Carroll  
Directing Attorney  
Consumer Rights & Economic Justice  
Tel: 213-385-2977 ext. 137  
Pronouns: she/her/hers

**EXHIBIT XX**



*The nation's largest pro bono law firm*

November 4, 2020

Via: Email to [ari.malka@csun.edu](mailto:ari.malka@csun.edu)

Ari Malka, Ph.D.  
Senior Researcher  
David Nazarian College of Business and Economics  
California State University, Northridge  
Northridge, CA 91330-8245

Re: Questions related to CSUN's Year Two and 2019-2020 Evaluation Reports

Dear Ari,

Thank you for the LARCA 2019-2020 Evaluation Report. We have some related questions below. Before getting to those we wanted to follow up on our most recent correspondence (September 1, 2020) to see if EWDD ever got back to you with the missing data? Further, we reiterate that we think any report should flag data that is missing and make plain that it was requested but not provided. The purpose of the Monitor's reports is so that the parties and the judge can make a determination about progress in the implementation of the settlement. If the Monitor is not able to collect and report on important data about activities and improvements that speaks to the efficacy of program implementation.

**Other matters related to the Year 2 report**

The City reported that you did not provide EWDD with a list of WSCs were you had received feedback that they were not appropriate for the program (p3 and 7 of your Year 2 report). The City stated that you could not do so for confidentiality reasons – if that is correct, can you explain why you couldn't provide anonymized feedback?

The City also reported to us that they do not believe it is “impossible to track educational and employment outcomes” in the CalJOBS system a noted in the Year 2 report at pages 7 & 8, and that CalJOBS has the capacity to track educational and employment placements. Can you elaborate on your perceived deficiencies of the CalJOBS system?

**LARCA 2019-2020 Evaluation Report**

We note that the focus group participants were selected by a group of service providers which were hand-picked by EWDD. Can you explain why you followed this approach, as opposed to casting the net more broadly? Also, was any consideration given to reaching out to people with

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Page 2

approved claims who had not yet connected to any services under the settlement? Can you explain why that didn't form part of your analysis? Is it possible to do more focus groups at this point and, if not, can you provide us with a timetable and proposed methodology for next years' report such that we can provide input to the process? We also believe that it is critical to consult with Plaintiffs' attorneys during the monitoring process, not only to get our perspective, but also because we have been involved in our own outreach to approved class members to encourage them to enroll in services and understand the barriers they perceive to receiving benefits under the settlement.

In the "Participant Perception of, and Attitudes towards, the Program" section you provide an overview of collective findings, rather than summarizing the results of each question set. Would it be possible to look at the data related to the individual questions?

We remain, as always, available to discuss any of the issues raised herein.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Stephanie Carroll', written in a cursive style.

Stephanie Carroll  
Senior Staff Attorney  
Consumer Rights and Economic Justice  
Tel: 213-285-2977 ext. 137

CC. via email to:

Cindy Pánuco  
Erika Luna  
Lupe Sanchez  
Brandon Martinez  
Gerardo Ruvalcaba  
Ricardo Renteria  
Regina Mills  
Scott Marcus