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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 CHRISTIAN RODRIGUEZ,
16 ALBERTO CAZAREZ, individually
17 and as class representatives

18 *Plaintiffs,*

19 vs.

20 CITY OF LOS ANGELES, CARMEN
21 TRUTANICH, CHARLES BECK,
22 ALLAN NADIR, ANGEL GOMEZ
23 AND DOES 1 THROUGH 10.

24 *Defendants.*

Case No.: CV11-01135 DMG (JEMx)

**DECLARATION OF BEN “TACO”
OWENS IN SUPPORT OF
PLAINTIFFS’ MOTION TO
ENFORCE SETTLEMENT
AGREEMENT**

Date: April 12, 2024
Time: 9:30 a.m.
Location: Courtroom 8C
Hon. Dolly M. Gee

Complaint Filed: February 7, 2011

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DECLARATION OF BEN “TACO” OWENS
IN SUPPORT OF
PLAINTIFFS’ MOTION TO ENFORCE SETTLEMENT AGREEMENT

1. I am the Executive Director of Detours Mentoring Group, a supervisor for Advocates 4 Peace and Urban Unity (APUU), an Executive Board member of the Southern California Ceasefire Committee, and a Community Violence Intervention Specialist at Urban Peace Institute. I make this declaration based on my own personal knowledge and, if called as a witness, I could and would testify to the following matters.

2. Detours Mentoring Group, which was founded in 2000 and incorporated in 2008, is a non-profit 501(c)3 organization focused on culturally-relevant youth intervention and prevention programs to empower at-risk youth to break the habits that lead to trouble in school and in the streets. We provide services such as Mentoring, Gangs Intervention and Prevention, 12 Step Meetings, Employment Referrals, Computer Lab, Tattoo Removal Referral, and Transitional Housing. We are based in Gardena and have strong relationships with the gang involved and violence impacted communities in South Los Angeles.

3. In the summer of 2021, Detours Mentoring Group entered into an MOU with Los Angeles Reconnections Career Academy (LARCA) to recruit and sign up class members for the Rodríguez Gang Injunction Settlement’s Jobs and Education Program (“the program”). To recruit claimants, we have to go out into the community to find people who might be eligible for the program. A lot of our recruitment happens on weekends when we are at community events. We never know who might be eligible, so we are always talking to people about the program. Most do not know about the program unless they heard about it from their friends in the community. I have not seen any marketing materials on the program, so I believe most class members find out

1 about the program through word of mouth. We find that people are open to the program once we
2 tell them about it because we are as transparent as possible and have worked hard to gain the trust
3 of our communities.

4 4. Once we explain the program to them, we collect their names and submit their
5 personal information to LARCA, which notifies us whether their names are on their list or not. It
6 sometimes takes two weeks to hear back from them. This process can be made more efficient if it
7 were not for LARCA's list containing misspellings and incorrect or outdated contact information.
8 For fathers and sons with the same names, it was especially difficult for LARCA to differentiate
9 between them and therefore confirm their names.

10 5. For LARCA's approved names, we reach out to the claimants and begin their
11 applications. We receive a stipend per claimant who signs up for program, but we do a lot more
12 than recruit and sign people up. With the challenges people have experienced navigating the
13 process, I have had to be a buffer between the class members and the WorkSource Centers
14 because they do not understand our community. I feel like I do case management work because I
15 have to navigate people through the process and be a liaison for when WorkSource Centers do not
16 respond or deliver on their promises.

17 6. For claimants who have had their applications approved, there were also difficulties in
18 securing their benefits. Communication problems and unresponsiveness were a big problem,
19 which frustrated class members. For example, for a father who received his deceased son's
20 benefits, a Case Manager requested that the father provide information about his son's death.
21 However, there was a lot of confusion because the Case Manager did not specify the exact
22 required information. There was a lot of back and forth that did not get resolved until I stepped in
23 as a liaison to understand the specific requirements.

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1 7. I have three Detours Mentoring Group staff members working on this with me. We
2 touch base daily with different claimants and spend around 10-20 hours per week on this in
3 addition to our organizational responsibilities.

4 8. I have worked directly with around 65 claimants' applications and have helped to
5 navigate and direct around 30 additional class members through the process. People refer these
6 additional class members to me even though they are assigned to different WorkSource Centers
7 because they are experiencing challenges with navigating the process. I do not get compensated
8 for helping these additional class members, but I continue to work with them because I want all
9 claimants to receive the benefits they are entitled to.

10 9. During the COVID-19 pandemic, the WorkSource Centers fast tracked benefits for
11 claimants and provided additional benefits that really helped the people. A lot of these class
12 members during this time opted to get their bills paid instead of participate in trainings. One
13 claimant I worked with submitted receipts on mechanic repairs and rent, which were reimbursed.
14 Another claimant had his car in the shop in the summer of 2022, so he submitted an estimate and
15 working invoice of \$1,500 to the AIDS Drug Assistance Program (ADAP) WorkSource Center,
16 which sent a check directly to the car shop. I also heard someone got a Wing Stop franchise,
17 which was close to \$80,000. Word spread, and people were motivated to join the program. People
18 receiving benefits during this time were satisfied.

19 10. However, these benefits suddenly stopped around the fall of 2022. WorkSource
20 Centers told people seeking benefits that they ran out of money and were waiting on money to
21 come in from the City. People were told inconsistent things like that the program had ended and
22 that the program had run out of money. Good news travels fast, but so does bad news, so there
23 was a lot of confusion in the community. Claimants tried contacting the WorkSource Centers, but
24

1 they would not get any response to their calls and emails. People were frustrated because they
2 wanted their benefits, but were being ignored.

3 11. We had to be hands on with the City to figure out what the status was with the
4 program. I was in continuous contact with the City of Los Angeles's Economic and Workforce
5 Development Department (EWDD), but they would tell us that they themselves did not know
6 when the WorkSource Centers would have funds. They would then tell me to check back with
7 them in a couple of weeks. I eventually learned that some WorkSource Centers still had funds
8 because not that many claimants had come in to those locations, which was frustrating because
9 none of the WorkSource Centers or Case Managers referred claimants to these other locations to
10 receive benefits. Therefore, we dispatched several community ambassadors and volunteers who
11 are trusted within the community to encourage people for whom it was safe to go to those funded
12 WorkSource Centers. It was not always safe for everyone to go to these locations because of their
13 affiliations.

14 12. Every time the program was extended, I was not notified and instead had to contact
15 the EWDD to confirm the rumors I had heard and get more information on the extensions. Once I
16 received confirmation about the extensions, I would once again send our ambassadors and
17 volunteers out to inform the community.

18 13. Some WorkSource Centers and Case Managers could not keep up with the demand, so
19 we had to stop sending people to those locations. In one neighborhood, there were over 300
20 eligible claimants, so we began sending 20 claimants at a time to the ADAP WorkSource Center,
21 which was not the closest location to the neighborhood, but was the most accessible and safe for
22 them because the other locations were in rival gang territory. The ADAP location became
23 overwhelmed and stopped responding to a lot of claimants, which frustrated them and us because
24 we were trying to help them navigate the process. The locations of the WorkSource Centers need

1 to be aware of which locations might have more claimants and others, especially based on the
2 territorial restrictions this population has.

3 14. Another reason why the ADAP location could not keep up with the demand was
4 because one Case Manager was in a car accident and another Case Manager became ill, but
5 nobody replaced them to take up their caseload. The WorkSource Centers need to be properly
6 staffed to keep up with the demand and make sure cases do not fall through.

7 15. After hearing the success stories of some class members getting rent, bills, and
8 business start-up costs covered, many other claimants have been disappointed that they can only
9 use the program benefits for training that does not make sense for their situation. Elderly
10 claimants especially do not want the educational offerings, so they ask us “what’s the point?” and
11 walk away from the program. We ask if the benefits can be used for the same services as during
12 the pandemic, but Case Managers say that their hands are tied and the program can only be used
13 for training.

14 16. My staff and I are able to recruit and work with the claimants because we have strong
15 relationships with the community. Even with our level of access and trust within the
16 communities, our footwork in locating folks is extensive and time consuming. We encourage
17 people to take advantage of the program, but when the benefits are not available or overly
18 challenging to receive, it makes us look bad for promoting the program and then destroys the trust
19 we have in the community.

20 17. These class members are peculiar about providing their personal information and so
21 when there is no tangible benefit for them, it becomes dangerous for us because it seems like we
22 are acting as agents for the government to collect their personal information. They become
23 concerned that their personal information is being used for other reasons. Being resource
24 providers in the community, our reputation becomes tarnished when the program cannot provide

1 its deliverables. We do not want to lose access to our communities' trust because of their
2 frustration with the program.

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

6 Executed at Los Angeles, California on February 15, 2024



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8 Ben "Taco" Owens

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