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Attorneys for Plaintiffs

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 TINA
PADILLA 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

DECLARATION OF TINA PADILLA
IN SUPPORT OF
PLAINTIFFS’ MOTION TO ENFORCE SETTLEMENT AGREEMENT

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1. I am the Founder and Executive Director of Community Warriors 4 Peace (CW4P), which was established in July 2020. 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. Community Warriors 4 Peace is a nonprofit organization and member of the Los Angeles Violence Intervention Coalition (LAVIC) convened by the Urban Peace Institute. CW4P provides, support, and necessary tools to break cycles of poverty, violence, low educational attainment, and underemployment in our communities throughout Northeast Los Angeles. Our programs include Gang Reduction and Youth Development, Community Health Worker Initiative, and Food Distribution. We have relationships with many Northeast Los Angeles communities including Glassell Park, Cypress Park, Highland Park, Echo Park, Eagle Rock, Elysian Valley, and Atwater Village.

3. I am from the community, live in the community, and serve the community. I started working in gang intervention in 2013 and started CW4P three years ago because I am passionate about helping my community.

4. In September 2023, I got an MOU with LARCA to help promote receive a stipend of \$300 per applicant who we sign up for the Rodríguez Gang Injunction Settlement’s Jobs and Education Program (“the program”). We receive a stipend of \$300 per applicant who we sign up for program, but are not compensated for our outreach efforts or program navigation support. I have submitted approximately 20 applications and a lot more names to the program.

1 5. To locate and register qualified people, we go into our communities for outreach. The
2 City needs to understand that the community does not trust any messages or ads coming from the
3 City. They think there is a catch because they have been tricked before. Instead, this population
4 only trusts people and organizations that have worked hard to build trust within their
5 communities, like my organization.

6 6. When my staff and I do our outreach into the community, we have to check to see if
7 peoples' names are on the list of class members, so we have to have their trust to be able to get
8 their name, date of birth, and gang affiliation. I then send a list of names to the City and have to
9 wait for a response from them to confirm who is eligible for the program. However, the City's
10 responses have been delayed. For example, it recently took three weeks to learn that out of the
11 seven names I provided, only four were on the list.

12 7. During our outreach, we break down the program for people and fully explain it to
13 them. However, it is hard to explain when it is not clear what benefits are currently available.

14 8. One man told his friends that before the COVID-19 pandemic, he got \$20,000 to start
15 his business then additional funds for his rent. That made his friends want to sign up for the
16 program. But, when they applied, they were told that they could only use the benefits to go to
17 school, get work experience, or get tattoo removal. For some people I have worked with, they are
18 not interested in these services because they already have a job and therefore are not interested in
19 school and do not have time to work two jobs. It hurts the program's credibility in the community
20 that it is not clear what benefits are actually available for the eligible people whose rights were
21 violated.

22 9. My staff and I try to help class members get at least something from the program, so
23 we tell them about expenses we know they can get covered, like gas or work boots. But, they are
24 frustrated because these are around \$100 whereas their friends got \$1,000s. It also takes a long
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1 time to get reimbursed. People want to be compensated and benefited, but they do not have
2 enough options and there are a lot of hurdles to get any benefits.

3 10. Once I hear back from the City confirming the eligible individuals' names, I bring the
4 eligible applicants in right away so we can help them fill out their applications. I walk them
5 through the entire application and get them submitted right away. Then once again, we have to
6 wait to hear back. I have been waiting over a month to hear back from the City on a group of
7 applicants' enrollment forms and applications for work experience.

8 11. On average, it takes applicants two to three months from submitting their applications
9 to getting services. Two months was the fastest turnaround I saw, and the longest was four
10 months.

11 12. People feel abandoned because the process is telling them to hurry up and wait. People
12 get frustrated and tell us that the program is "a bunch of crap." Often, they do not get the benefits
13 they expected and they say the program is a roadblock, as expected. They tell us that they are in
14 an even worse position than before they submitted their applications because they are now
15 worried that their personal information is out there with the government. Some get so discouraged
16 that when they finally do get a call back from a WorkSource Center, they do not pick up the
17 phone because they lost all trust in the settlement program, so we have to encourage them again
18 to participate.

19 13. Because of how challenging it is to work with the program, we do a lot more than sign
20 applicants up for the program. We have to help applicants navigate the entire process or else it
21 would be difficult for them to get any responses and therefore benefits. On average, with seven of
22 us at CW4P working on this program, we spend 20 hours per week each working with applicants
23 to get them the services that they are entitled to.

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1 14. Avenue 26 Goodwill in Lincoln Heights has confused and frustrated a lot of
2 applicants. To get their work experience approved, some men submitted the requested pieces of
3 information, but after submitting the requested information, the WorkSource Center requested
4 more and more information. This Center also insisted that the men complete some tasks online,
5 but the men did not have regular access to technology and printers. These men told me that the
6 WorkSource Center is making them do too much for too little benefit, so they are done with the
7 program.

8 15. I have two gentlemen who signed up in October 2023 and barely got everything
9 through to the Avenue 26 Goodwill in Lincoln Heights to get their work experience started in late
10 January 2024. Whenever we received a response from Goodwill, the applicants were told that
11 they needed to do this and that. There was always more for the applicants to do. The program
12 needs to understand that this population is not going to sit still and wait months to jump through
13 all of the hurdles to maybe receive some minor benefits.

14 16. For one class member who was part of the first round of the settlement, he went to the
15 Avenue 26 Goodwill in Lincoln Heights, which told him that they ran out of money then sent him
16 to another location, which was located in a neighborhood that he could not go to because it was a
17 rival area. It is really frustrating that the WorkSource Centers do not understand the population
18 they are working with and that they are driving people away.

19 17. The Canoga Park WorkSource Center told him that he would be reimbursed for a loan
20 to start a business, so he decided to take out a loan in 2019 to start a party rental business. Then,
21 COVID-19 hit so his business never took off, but he still owed money for the loan. He only got
22 the loan because he was told that he would be reimbursed, but he never received any responses or
23 reimbursements. He continued to follow up. I then sent a message to Karina Henriquez at
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1 LARCA, which runs the program, who sent him to the Pico Union WorkSource Center and
2 they're finally going to help him now in 2024.

3 18. Through his conversations with different WorkSource Centers, he was told that some
4 people were getting \$30,000-40,000 of help, but that there was now a cap of \$10,000 per person.
5 However, a Case Manager told him that supply reimbursements can be extra services that he can
6 get on top of the cap. It is this kind of conflicting and inconsistent information that frustrates the
7 class members and us as we are trying to guide applicants.

8 19. I have the hardest time working on cases where people are deceased or deported and a
9 family member is supposed to get the benefit, or when the class member is undocumented.
10 Getting their benefits is particularly difficult. For example, I am currently helping a volunteer at
11 my organization who is the mother of a deceased class member. She submitted a beneficiary
12 claim, but still has not received any benefit.

13 20. For another class member who was deported, I am working with his undocumented
14 mother who is supposed to get his benefits. She has also been volunteering with my organization
15 and I still cannot find a way to compensate her for her time through the work experience benefit.
16 There is too big of a time gap between having her claim accepted at the Avenue 26 Goodwill in
17 Lincoln Heights and getting her paid.

18 21. It is clear that the program and its Case Managers are not educated on how to work
19 with the class members. One of the people I was helping was a beneficiary in the first round of
20 the Settlement. He was told to come to the WorkSource Center in Pico Union, which is not safe
21 for guys in his neighborhood. However, the program told him that if he wanted to get his money,
22 then he had to go to that location.

23 22. One time I got a group of seven guys to come with me to the Avenue 26 Goodwill in
24 Lincoln Heights. I talked to the Case Manager there and explained that I wanted to help with all

1 of their paperwork and translate for all of them as a group. The WorkSource Center then gave us
2 a photo release form to sign because the Goodwill wanted to use this as a photo opportunity. I had
3 to keep telling them that none of the guys were going to sign it. This was frustrating because
4 especially for one the guys, he did not want his eight year old son to even know he was
5 previously a gang member. It was offensive that the Goodwill did not understand the risk and
6 wanted to use this as a photo opportunity.

7 23. Also, the program paperwork is all in English and the WorkSource Centers cannot
8 communicate with a lot of the applicants because there are no translators. For example, the Case
9 Managers does not speak Spanish, so I have had to translate both the paperwork and
10 conversations for a lot of the applicants. Without me, they would have turned around and left.

11 24. The Case Manager at Avenue 26 Goodwill in Lincoln Heights told a group of
12 Spanish-speaking women I was assisting and translating for that they could take a financial
13 literacy class in English to receive \$500 gift cards. The women do not speak English and would
14 not be able to understand the fourteen courses that were two hours each. The program needs to
15 recognize that not every participant speaks English. Those who do not speak English need
16 translators or help from people like me, otherwise they cannot get any benefits.

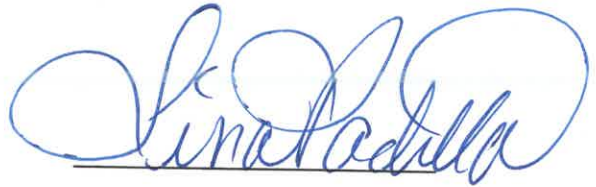
17 25. This settlement program could be doing great things for the community. I currently
18 have three individuals who are doing their work experience with my organization. They are
19 helping with community events and through them, I can see that this program can have a positive
20 impact for the lucky ones it has worked out for. The program needs to be improved because there
21 is a lot more need in our communities. Organizations like mine unfortunately cannot service
22 every qualified individual because of how complex the program is to navigate.

23 26. The unresponsiveness, inconsistency, and cultural incompetence of the program are
24 detrimental to my organization's work because the communities then think that we are not

1 trustworthy and that we are promoting a useless program. We have worked hard to build trust
2 within our communities. The more challenging it is for applicants to navigate the process to get
3 their benefits, the harder it is for organizations like us to do the work that we have been doing.
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5 I declare under penalty of perjury under the laws of the United States that the foregoing is true
6 and correct.

7 Executed at Los Angeles, California on 2/15/2024
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11 **Tina Padilla**
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