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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 ALEX
SANCHEZ 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 ALEX SANCHEZ
IN SUPPORT OF
PLAINTIFFS' MOTION TO ENFORCE SETTLEMENT AGREEMENT

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4 1. I am a founding member of Homies Unidos, which was founded in 1998 and
5 established as a 501(c)(3) nonprofit organization in 2000. I have served as its Executive Director
6 since 2006. I make this declaration based on my own personal knowledge and, if called as a
7 witness, I could and would testify to the following matters.

8 2. Homies Unidos works to end violence and promote peace in the Pico-Union,
9 Westlake, and Koreatown immigrant communities through gang intervention, the promotion of
10 humane treatment of marginalized youth, and providing positive and productive alternatives to
11 gang involvement and destructive behavior. Our programs include Arts and Culture, Youth
12 Development, Community Response Initiative, Epiphany Project and Tattoo Removal, Homeless
13 Peace Initiative, and more. To date, we have served over 8,000 youth and their families.

14 3. Through my work with Homies Unidos, I have had direct experience with the Jobs and
15 Education Program for the Rodríguez Gang Injunction Settlement since April 2021. We were
16 brought in through a friend who knew Karina Henriquez. Karina currently works on the
17 administration of the Jobs and Education Program at City of Los Angeles's Economic and
18 Workforce Development Department (EWDD)/Los Angeles Reconnections Career Academy
19 (LARCA).

20 4. In March 2021, Homies Unidos entered into an MOU with LARCA to work with a
21 WorkSource Center to help do outreach to recruit class members to participate in the settlement
22 program and help them fill out their applications. We receive a small stipend for each application
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1 we help submit. That site never responded, so I got transferred to work with another site with
2 Catholic Charities of LA in April 2021.

3 5. To do this work, we collect personal information from individuals that we recruit from
4 the community and send a list of those peoples' information to LARCA. LARCA would then
5 check to confirm that these individuals were on their list of class members. Once LARCA
6 confirms their names, then we notify the class members and help them fill out their applications.

7 6. Each application takes a very long time. Although we are paid per application, the
8 stipend does not compensate us for the huge amount of work done by our Homies Unidos staff to
9 get each application completed. We do not have the money to assign a staff member to be directly
10 in charge of these applications and not do other work for our organization, so we have a team of
11 five, including myself, who have made it part of our work to go to all different communities to
12 recruit and work with applicants. We go into the communities that we have regular engagement
13 with because they know us and trust us. Trust is incredibly important to this work, especially
14 when asking our communities to interact with the government.

15 7. I was surprised that the City did not dedicate more resources to do the outreach to the
16 communities to build awareness about the program. My team and I have had to do the outreach in
17 our communities for this program. Fortunately, because Homie Unidos has a strong relationship
18 with the impacted communities, our staff is able to effectively work with these populations and
19 recruit applicants through word of mouth.

20 8. However, we cannot reach everyone. The WorkSource Centers are not accessible for a
21 lot of individuals who qualify for the program, such as the homeless, those who were deported,
22 and those who are in prison. We have programs such as Homeless Outreach and a Prison Program
23 so that we can fortunately do this outreach for LARCA during the course of our regular
24 engagement with these populations. We cannot locate, notify, and explain the program to every
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1 qualified applicant though, so these special circumstances need to be taken into account so people
2 do not get left out of the settlement benefits.

3 9. Another obstacle is that the injunction lists provided to LARCA are incomplete. In my
4 experience, a lot of folks were served gang injunctions by a police officer, but the officer never
5 submitted the paperwork so their names do not show up on the list. Saying that someone was in
6 the injunction was a fear tactic used by the police. Some of these individuals have the papers they
7 had been served only to find out that it was never filed by the police.

8 10. Sometimes we can find people based on misspellings or old addresses, but it has been
9 difficult and time consuming for us and the individuals. For one young lady, her name did not
10 show up on LARCA's list, but she knew she was entitled to join the settlement program. Finally,
11 we found her on the list through an old address.

12 11. There is no process for people who cannot be found on the list. I have had over a
13 dozen individuals who cannot be found on any list and are therefore unable to get any of the
14 benefits that they are entitled to. The list is not reliable.

15 12. Many give up on the program after hearing "no." I was working with a woman who is
16 incarcerated who transferred her benefits to her partner, who does not know what to do with the
17 benefits because she does not have time for education and job training. A lot of these people had
18 heard about people getting rent and other bills covered by the program, so they do not understand
19 why they cannot get the same benefits.

20 13. Class Members who are unhoused are also having a tough time using their benefits.
21 More than education or job training right now, they need a place to live. After hearing that the
22 program had covered rent, unhoused people have asked LARCA if they can use their benefits for
23 first month's rent and a security deposit to secure an apartment, but they were denied. They are
24 told that the program cannot cover rent even though they had heard people from their

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1 communities getting their rent covered. Not understanding why they cannot get the same benefits,
2 they get frustrated and walk away from the program because it is not addressing their actual
3 needs.

4 14. During our outreach and recruitment efforts, a big challenge we faced with these
5 applicants is convincing them to sign up for this program, which is run by the same city that put
6 them on the gang injunction list in the first place. After seeing the city logo, many of them
7 initially threw the letters they received from the city in the trash without opening or reading the
8 letters. That is the level of distrust these applicants have with the city.

9 15. The applicants are suspicious of providing their personal information to a program run
10 by the city because they think it might be a trap. Therefore, my staff and I have to overcome their
11 suspicions and gain each applicants' trust first before we are able to walk them through the
12 application. We are able to do this by saying "so-and-so received this benefit" and "so-and-so
13 from your community was able to get that benefit." After hearing examples and talking to their
14 friends, they begin to open up to us and start to ask us what kind of help they can receive because
15 these people are in need of these services.

16 16. However, the WorkSource Centers do not provide consistent information about the
17 services offered, so we are not able to provide applicants with up-to-date information, which
18 raises the applicants' suspicions surrounding the program. After trying to get clarification from
19 the WorkSource Centers, we still do not know what services they can provide or who can qualify
20 for what service. It is unclear to me why some applicants received a lot of benefits while others
21 were limited to \$10,000. There were rumors that some applicants received up to \$80,000.

22 17. Before the COVID-19 pandemic, one man got \$10,000 in back mortgage then got paid
23 for a certificate program on top of receiving other benefits. He was excited and telling all of his
24 friends that the program is real and that the program was not a trap to get arrested. However,

1 when his friends went for the program, they were told that the program cannot provide help with
2 a mortgage or housing and some were told that LARCA would only help for one payment of rent.
3 It seemed like there was not an overall agreement. It was up to the Case Manager on a case by
4 case basis. LARCA would just approve things without clear rules and then they would make
5 abrupt changes that would confuse us and the Class Members. This confusion makes it difficult
6 for us to convince class members to go through the work of applying for benefits.

7 18. During the COVID-19 pandemic, some class members received help with rent, car
8 loans, and other things that were not technically part of the settlement agreement but that the
9 people really needed. However, when we asked the WorkSource Center for clarification on their
10 services, this extra help suddenly stopped without explanation in 2022. Based on my experience,
11 people with accumulated debts were getting these additional benefits during COVID-19. When
12 we asked why these services were stopped, we were told that there were exceptions to the rules
13 because of COVID-19, but now that the pandemic was over, they had to return to strict uniform
14 rules.

15 19. Because we have heard different information from different Centers, we are not able
16 to tell applicants the exact services they can benefit from because we do not know. Therefore,
17 after telling applicants examples of what previous applicants have received, we now stress to
18 them that they have to make their case when talking to a Case Manager to be able to receive any
19 benefits. This can be a big turn-off to people, telling them they are entitled to a benefit but they
20 have to fight for it.

21 20. After working so hard to gain the trust of each applicant we help and completing their
22 applications, we then have to tell them to trust the WorkSource Centers and their Case Managers
23 with their cases. Unfortunately, dealing with the WorkSource Centers and Case Managers has
24 been difficult though. The applicants are already frustrated that they have to deal with a new
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1 organization and contact person, so the additional challenges they face at the WorkSource Centers
2 and with Case Managers discourage them from participating in the program.

3 21. Most of the WorkSource Centers' staff are not culturally competent to work with these
4 populations. The staff do not understand the trust issues that this population has with the city and
5 by extension, any of the city's programs.

6 22. For example, the locations of WorkSource Centers were not selected with cultural
7 competence in mind. Some are located in a rival gang's territory, discouraging a lot of applicants
8 from agreeing to apply and follow up to receive any services.

9 23. Case Managers need to understand that the process is especially difficult for the
10 elderly beneficiaries who got their benefits transferred from their children. Case Managers ask
11 these elderly people how they want to use the program without being told what it covers, so we
12 have to explain how they can use it and they do not understand why they cannot use it for rent
13 when they heard that other people got their rent paid. When Case Managers tell these elderly
14 people to go to school, they become turned off from the program because they are not interested
15 in going to school. This process is even harder for those who do not speak English because the
16 WorkSource Centers do not always have translators or multilingual staff or documents in
17 Spanish.

18 24. Applicants get frustrated working with Case Managers who do not speak their
19 language, do not understand, respond to calls or emails, and do not try to understand how to work
20 with the community and meet people where they are. Because of these frustrations, we were
21 starting to get called out by the applicants since we were the ones who helped them fill out the
22 applications and participate in the settlement programs. To address the gaps in the program, I
23 continue working with them beyond just helping them to fill out their applications.

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1 25. I also asked the LARCA program to hire us or at least fund one staff person to be in
2 charge of the outreach and follow up on cases full time, because we do not have the funding or
3 resources to help everyone. There is a lot of need. If we had someone in charge, especially from
4 the community and with trust and working relationships with our organizations and community,
5 then the program would run more smoothly and more people can get their benefits. Applicants
6 would feel more comfortable being able to communicate culturally and in their language too.
7 Unfortunately, I was told that we cannot get a staff in charge of this though.

8 26. Case Managers at the WorkSource Centers have told applicants that the settlement
9 funds are gone without being told about other locations or services available to them. They then
10 tell their friends that there is no more money and the program is over. These applicants decided to
11 trust us with their personal information, so when they are told it was all for nothing, they become
12 upset with the program and us. This causes us to lose credibility within our communities.

13 27. A lot of applicants do not ever hear back from WorkSource Centers as well. For
14 example, I was helping one individual whose brother transferred benefits to them after getting
15 deported. They called and called, but never heard back. This is very common.

16 28. I have also had people who had to borrow money from other people because LARCA
17 asked them to cover their settlement costs upfront and they would get paid back later. Then they
18 have to wait for their funds to come in. For one woman who was waiting and struggling
19 financially, LARCA finally got back to her but told him that his receipts were not legible. For one
20 of the ladies I was working with, LARCA told her that because the copy of her receipt was not
21 legible, she would have to submit the physical receipt. It was a little faded, but I was able to see
22 the amount and company name on the receipt from the scan. She has a picture of the receipt, but
23 no longer has the physical receipt, so now she is really angry. She got the benefits transferred
24 from her partner, who is now mad at us too because she cannot get reimbursed. The program

1 needs to recognize that these people do not have access to technology, like good scanners, and
2 they might not keep all of their receipts once they submit them. More important, they should not
3 have to advance costs.

4 29. For another man, he did not want to receive education or job training, so a Case
5 Manager suggested that he get equipment to start a business. He did not have funds to buy the
6 equipment himself, so the Case Manager made the purchase for him from Home Depot. The man
7 then waited for the order at Home Depot, but was told that someone else had already picked up
8 the equipment. He asked to see the CCTV footage, but was denied, and the Case Manager would
9 not do anything else for him. He never got the equipment that was purchased for him using his
10 benefits and now he no longer wants to have anything to do with the program. Every time the
11 program does not work out for people, they talk to others about their experiences, which makes
12 other eligible people not want to waste their time applying to a program that does not deliver on
13 their services.

14 30. Because of how unresponsive the WorkSource Centers are, my Homies Unidos staff
15 and I have to then act as mediators to guide applicants through the process even though we are
16 not the City and do not get paid to help people navigate the program after they complete their
17 applications. I have told applicants to log how many follow up calls and emails they have sent to
18 try to get a response from the WorkSource Centers. I even encourage applicants to cc my email
19 address to their emails so that I can follow up with LARCA and Karina Henriquez. Karina would
20 then reach out to the WorkSource Centers to see what the problem is.

21 31. For those who were able to get their applications approved by the WorkSource
22 Centers, their next challenge was getting the actual benefits. We are always open to letting
23 participants do their work experience with us at Homies Unidos, but that approval process from
24 the WorkSource Center takes a long time even though we are ready to host. I want the

1 participants to get this job experience immediately so that they can get a job afterward and be
2 productive members of the workforce. We have success stories of people changing their lives and
3 outlook from their work experiences with us and these successful people go on to serve their
4 communities. Hosting takes a toll on us though because we are not paid for that and I have to find
5 funding to design a program and get a supervisor for them so that they can get the job training
6 that they deserve. Applicants are designated 325 hours of work experience. They have heard that
7 they can get more hours from others who had their hours extended because they do not qualify for
8 other education or jobs benefits. In some cases, Case Managers have been able to provide
9 extensions and in others, they have not, sending mixed messages and causing confusion. We were
10 told that these types of decisions are case by case.

11 32. The applicants feel that no one wants to work with them, so they become increasingly
12 frustrated with the WorkSource Centers and walk away from the benefits. In response, my staff
13 and I have to fill in the gaps and try to connect them to different services that could provide them
14 with the assistance that they need even though they are fully qualified to receive services through
15 the Jobs and Education Program. We also get worried that these frustrated applicants will tell
16 their friends that the program is useless, causing more eligible people to leave their benefits on
17 the table.

18 33. For my team of five, this has taken a great amount of our time to do the recruitment,
19 fill out applications, and guide everyone through the unresponsiveness and inconsistencies. I
20 average that it takes 2.5 hours for outreach per week. It approximately takes 15 minutes to
21 convince applicants to give us their personal information, 15 minutes to check the list and get
22 back to the applicant, 15 minutes to fill out the application and submit it to LARCA, and 30
23 minutes to locate the individuals who are qualified but do not have easy access to email or phone.
24 We work with on average two to three new people per week. We also spend about 2 hours a week

1 navigating between Case Managers and applicants. This does not include the follow up work,
2 supervision we do for those who are doing their work experiences with us, and the grant
3 applications we have to fill out to be able to provide them with substantive programming during
4 their work experiences. We do not get paid for this work, except for a stipend per application
5 completed.

6 34. These challenges experienced with WorkSource Centers destroy the trust that our
7 Homies Unidos staff had spent so much of our time and energy to build in these populations.
8 These applicants applied to this program at great personal risk to themselves and their families,
9 and after being ignored or denied services, they become scared that they were tricked into
10 providing the city with their personal information. As a result, these applicants are lost and
11 without the services they were promised.

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

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

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19 Alex Sanchez

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