

From: Tim Tatro <tim@tatrolopez.com>
Sent: Monday, May 11, 2020 8:52 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Cc: Benjamin R. Jones <bjones@awattorneys.com>; Julie Thorpe-Lopez <Julie@TatroLopez.com>
Subject: Comments on the RIR for Imperial Avalon MHP closure hearing on 5/13/20

*** EXTERNAL SENDER ***

Dear Ms. Soltani,

My firm represents the HOA for the Imperial Avalon Mobile Estates mobilehome park (Park). I would like to lodge this series of recommendations into the public record for consideration by the City of Carson Planning Commission in regard to Imperial Avalon LLC/Faring's application for Park closure.

The draft Relocation Impact Report (RIR) by Overland Pacific & Cutler (OPC) highlights some key things that we already know: The park contains many older homes that are just not feasible to move, and many residents are low income and rely on Social Security benefits to survive. That means that park closure will lead to complete displacement from home, location, and community for over 250 homeowners and families. Mitigating that loss is difficult to quantify, but here are some steps that the Planning Commission should take to ensure the sufficiency of the relocation package proposed:

1) Insist that the Park Owner incorporate into the RIR the adjusted on-site values calculated by James Brabant.

James Brabant is a well-respected appraiser who has been involved in many mobilehome park cases. Had he been available in the first instance, Mr. Brabant likely would have been the appraiser that the City would have chosen to do the initial appraisal work. His numbers related to Option B really reflect what should be considered the baseline appraisal, whereas Mr. Netzer's valuation should be considered a discount from the baseline, one that is not justified.

Mr. Brabant concluded that Mr. Netzer's methodology and discount rate were not well supported. Done correctly, per Brabant's calculations, the total appraised value of the homes using Mr. Netzer's data is \$15,287,235. Mr. Netzer undervalued (by more than \$2.1 million) the impact of rent control on a home's value. Buying a home in a rent-controlled park infuses the home with additional value that any future home buyer would recognize, particularly in Southern California where unregulated rents are so high. In any formal contest, Mr. Brabant's credibility is going to carry the day over Mr. Netzer, both in terms of depth of experience and thoroughness of analysis.

The \$2.1M delta in valuation is much less difficult for the Park Owner to roll into the total cost of development than it is for the residents to absorb as they try to reenter the housing market with scant resources available. Most are no longer working and would have difficulty even qualifying for a mortgage loan. They need every penny.

2) Require selective reappraisals for those homeowners who have invested in upgrades to their home or who

identify obvious errors.

Mr. Netzer did not review any resident surveys, so his appraisal makes some assumptions about the home interiors. That means that significant improvements, especially inside the home, may not be reflected in Mr. Netzer's appraisal of that particular home. To correct for this, either Mr. Brabant—or Mr. Netzer under Mr. Brabant's supervision or review—should reappraise any home in the park where the homeowner submits a written claim for consideration of home improvements that were overlooked, which could be supported by photographs, receipts, etc. Again, this is on a case by case basis and would not require a wholesale reappraisal of the entire park. Similarly, selective reappraisal should be permitted where a resident notifies the City or OPC of a verifiable mistake made in the appraisal of his or her home (i.e., wrong make, model, or year; incorrect square footage or bedroom count, etc.).

3) Require the Park Owner to fund the appointment of a Special Master to adjudicate all title disputes, benefit disputes, and special circumstance claims.

As the date for park closure approaches, unexpected problems will surface. Title disputes become particularly problematic where there has been a divorce, a death, an inheritance dispute or probate proceeding, bankruptcy, or unconventional allocation of relocation benefits related to a particular home. OPC is not well suited to handle these kinds of issues without legal guidance as to who the benefits should be paid to, so when this kind of challenge inevitably happens, OPC has to punt. That means residents will make calls to the City, to the Park Owner, to management, and to the HOA. This raises the risk of inconsistent guidance, makes the issues more difficult to track, and sometimes creates conflicts of interest.

Similarly, there will be special situations that need to be considered on a case by case basis, often related to disability access, eligibility for other government programs, and other special hardships. These Special Circumstance claims can become very time-consuming and sometimes fall outside OPC's core skill set.

For these reasons, there is an incredible benefit in having all of these types of situations adjudicated by one person, a designated Special Master who has the discretion to resolve these disputes without court action. Much like a mediator, the Special Master can help resolve disputes between parties, family members, etc., but also has the power to make factual and legal determinations when necessary. He or she can also interface with probate and bankruptcy counsel when needed. This Special Master process alleviates a lot of the problem-solving that would otherwise fall on the shoulders of the City Attorney and the Park Owner, and that would otherwise take much more time to resolve, particularly if judicial intervention would otherwise be required.

It's important that the Special Master be a retired judge or a senior-level lawyer with pertinent experience, and that he/she have no connection to any of the parties or the project. The Special Master is typically paid by the hour and the budget for this position is funded by the Park Owner. It should be someone agreed to by the Park Owner, the City, and the HOA. This mechanism will protect the desired timeline because the Special Master "hearings" can take place in a conference room at the availability of the residents and family members involved without interfering with the processing of the 85% of the remaining claims that will likely not require any special handling.

From personal experience, I cannot emphasize enough how much time, effort, and money will be saved by having a Special Master involved from the outset. It will make OPC much more effective and will foster more confidence in the impartiality of the results.

4) Allow residents access to their full relocation benefits at least 60 days prior to departure from the Park.

Losing one's home and having to move is traumatic. Having to move twice in a short period is unthinkable, particularly for seniors and the disabled. Residents need to have access to their full relocation allowance well enough in advance to be able to secure replacement housing if they chose that route. The RIR's suggested 30-day window is not enough. A

typical escrow is 45-days and, for the vast majority of residents in this park, their lump sum relocation payment is the only source of a potential down-payment they have for a replacement home. So, they need access to those funds at least 60 days in advance of their departure from Imperial Avalon. Otherwise, it's likely that some residents will have to find temporary housing and put their belongings in storage for a few weeks to bridge the gap. That must be avoided at all costs because it is just too difficult for seniors.

5) Allow residents to request early termination and require the Park Owner to run all early termination agreements by the Special Master or the City Attorney to ensure that all homeowners are receiving the required mitigation.

The residents are grateful that park closure is not slated until January 2022 at the earliest. However, for some homeowners, there will be opportunities to find alternate housing before then. For others, their life circumstances might change and dictate that they need to leave the park before 2022. In any event, there needs to be a universal means of requesting early termination of tenancy without sacrificing the mitigation available if they had stayed until the last possible day. From a big picture perspective, this is desirable anyway because, ideally, you don't want 200+ families entering the housing market on the same day; it would be better to spread out the exodus over stages.

We understand that the Park Owner has opened up a dialogue directly with certain park residents on this topic already. We applaud those efforts in concept. However, steps need to be taken to ensure that everyone is being treated equally and that the terms negotiated are consistent with the mitigation required under state and local law. This is particularly true where those agreements are being negotiated outside the purview of the HOA or the HOA's counsel and there is no oversight. Towards that end, we recommend that a universal early termination agreement be developed and utilized in lieu of piecemeal agreements, and that all such finalized agreements be submitted to either the Special Master or the City Attorney for review and approval. (It is not expected that the City Attorney would be rendering legal advice to the residents, but merely ensuring that the agreed upon template is utilized.)

(All of these points are in addition to the due process concerns raised in my prior correspondence.) I hope these recommendations are taken to heart because the residents of Imperial Avalon feel extremely vulnerable, especially right now. We look forward to working with you towards a humane relocation plan for the residents.

Sincerely,

Tim Tatro

Counsel for Imperial Avalon Mobile Estates HOA

Tatro & Lopez, LLP
12760 High Bluff Drive, Suite 240
San Diego, CA 92130-2018
E-mail: Tim@TatroLopez.com
Web: <https://www.tatrolopez.com>
Tel: 858.244.5032 Fax: 858.847.0032

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Appeal Application

City Clerk's Office
701 E. Carson St.
Carson, CA 90745
310-952-1720

Clerk's Date & Time Stamp

RECEIVED
CITY CLERK

2020 MAY 26 PM 4: 26

CITY OF CARSON

Appeals are time sensitive and must be received by the City Clerk in the specified time period pursuant to the Carson Municipal Code or applicable authority. It is advisable to consult with the Department managing the issue if there is question with regards to appealing an action. All fees associated with appeals can be located in the City's Master Fee Schedule and/or Carson Municipal Code. This is an appeal of the:

- ☐ Director decision to the Planning Commission – shall be filed in writing within 15 days of the date of the Director action.
- ☒ Planning Commission decision to the City Council – shall be filed in writing within 15 days of the date of the Commission action.
- ☐ Other - Specify decision-maker, appellate body, Municipal Code authority: _____

Appellant Information:

Name(s): Young Choi on behalf of Suk Choi

Address: 21207 S. Avalon Blvd. Spc #204

City/State/Zip: Carson, CA 90745

Phone (310) 634-6200 / (310) 800-8200

Email younglchoi@me.com / skelectric@gmail.com

Appealing Application Regarding:

**If appeal is made by any member of the City Council or the City Manager, the sections identified with an asterisk (*) are not required; the Statement of Grounds for Appeal need only provide, in substance and effect, a request that a specific decision, administrative case number, or resolution number, as the case may be, be reviewed by the Planning Commission or City Council, as the case may be. CMC §9173.4.*

Name of Applicant(s): Imperial Avalon, LLC Date of Final Decision May 13, 2020

*Administrative File No. /Case No.: Relocation Impact Report (RIR) No. 05-20

*Street Address (otherwise, the legal description and location of the premises included in the action) 21207 S. Avalon Blvd

*Specific Matter Being Appealed: 1 The project violates CMC 9128.21 E (7) The appraised value was not fair market value as REQUIRED in CMC 9128.21 E (7)

2 Planning Commission erroneous decision by approving the RIR based on FALSE and HYPOTHETICAL information 3 Planning Commission did not consider ALL public records 4 The City violated Dynasty statute Bilingual Services Act

Statement of the Grounds for Appeal (attach separate sheet if necessary): Please see attached page.

Signature of Appellant Young Choi on behalf of Suk Choi Date: May 26, 2020

FOR OFFICE USE ONLY:

Date Appeal received: _____, 20____

Appeal Fee received: \$ _____

Donesia Gause-Aldana, City Clerk

cc Department Director, File

Young Choi & Suk Choi
younglchoi@me.com

May 26, 2020

Appeal Application of RIR 05-20
Statement of the Grounds for Appeal

- 1. The project violates Carson Municipal Code Section 9128.21 E.(7).**
The appraised value was not fair market value, and the Planning Commission erroneously approved the RIR based on false, and hypothetical information provided by the Developer.

"A requirement that a resident whose mobile home cannot be relocated within a reasonable distance to a comparable park be compensated by a lump sum payment based upon consideration of the fair market value of the mobile home on-site, including resident improvements (i.e., landscaping, porches, carports, etc.), any mortgage obligations of the resident on the mobile home, and the costs of purchasing a mobile home on-site in a comparable park or acquiring other comparable replacement housing."

The appraisal (Netzer) was inadequate and did not provide reasonable appraised value nor fair market value. Netzer's appraisal is based on false and irrelevant assumptions to purposely lower the value of the resident's homes. Netzer's "hypothetical conditions" are nowhere close to the fair market value, as required in CMC 9128.21 E.(7). Rather than using fair market value, Netzer's appraisal assumed closure of mobilehome park – which has not yet been decided. This is a false assumption of the appraisal, purposely to lower the value of the home. In addition, the City's peer-reviewer, Mr. Brabant based his review solely based on Netzer's appraisal, without even visiting the property himself. The appraiser also did not consider fair market value, nor any of the comparable (comps) in the area. Commissioners based their decision on falsified, and hypothesized appraisal, whereas CMC 9128.21 requires consideration of fair market value.

- 2. The Planning Commission violated Brown Act as they made erroneous decisions as they did not consider all public records.**

One of the public speakers during the meeting stated that his 15 letters were not part of the record. In addition, I sent a letter to the Planning Commission on April 28, 2020, but it was not part of the record. The Planning Commission did not consider all public correspondence and the public record, therefore was not fully informed of all circumstances and made an erroneous decision.

3. The City violated Dymally-Alatorre Bilingual Services Act, as they did not allow translation on written comments received by the City.

Government Code 7293. Every local public agency, as defined in Section 54951, serving a substantial number of non-English-speaking people, shall employ a sufficient number of qualified bilingual persons in public contact positions or as interpreters to assist those in such positions, to ensure provision of information and services in the language of the non-English-speaking person. The determination of what constitutes a substantial number of non-English-speaking people and a sufficient number of qualified bilingual persons shall be made by the local agency.

During the meeting, the City did not give chance to translators, nor prepared translation of the written comments. The City must have ensured provision of information and services in the language of non-English speaking person(s), and the City has failed to provide that opportunity. City of Carson has denied the right and ability of its citizens and residents to communicate with their government and the right and ability of the government to communicate with them. On May 13, 2020, Carson City Planning Commission violated Government Section 7290-7299.8, as known as Dymally-Alatorre Bilingual Services Act. The Planning Commission violated Dymally-Alatoree Bilingual Services Act; therefore, the decision was made erroneously.

From: [Young Choi](#)
To: [Planning](#); [CityClerk](#); skelectric@gmail.com
Cc: [Cristal McDonald](#); [Alvie Betancourt](#); [Cedric Hicks](#); [Donesia Gause](#); [Albert Robles](#); [Jim Dear](#); [Lula Davis-Holmes](#); [Jawane Hilton](#)
Subject: Appeal Application of RIR No. 05-20
Date: Tuesday, May 26, 2020 1:20:34 PM
Attachments: [Choi AppealApplication RIR 05-20.pdf](#)

Dear City Staff and City Council Members,

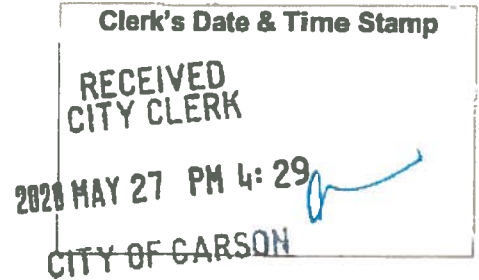
Please confirm the receipt of the Appeal Application of RIR No. 05-20. Since this application is time-sensitive, I kindly request that you let me know with any further instruction before the closure of the appeal period.

Thank you,

Young Choi

Appeal Application

City Clerk's Office
701 E. Carson St.
Carson, CA 90745
310-952-1720



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- ☒ Director decision to the Planning Commission – shall be filed in writing within 15 days of the date of the Director action.
- ☒ Planning Commission decision to the City Council – shall be filed in writing within 15 days of the date of the Commission action.
- ☐ Other - Specify decision-maker, appellate body, Municipal Code authority: _____

Appellant Information:

Name(s): Albert Robles

Address: 701 East Carson St

City/State/Zip: Carson CA 90745

Phone: 310-830-7600 Email: AROBLES@CARSON.CA.US

Appealing Application Regarding:

**If appeal is made by any member of the City Council or the City Manager, the sections identified with an asterisk (*) are not required; the Statement of Grounds for Appeal need only provide, in substance and effect, a request that a specific decision, administrative case number, or resolution number, as the case may be, be reviewed by the Planning Commission or City Council, as the case may be. CMC §9173.4.*

Name of Applicant(s): Imperial Avonlea LLC Date of Final Decision: 5/13/20

*Administrative File No. /Case No.: _____

*Street Address (otherwise, the legal description and location of the premises included in the action) _____

*Specific Matter Being Appealed: _____

Statement of the Grounds for Appeal (attach separate sheet if necessary): _____

Signature of Appellant: Albert Robles Date: 05-27-20

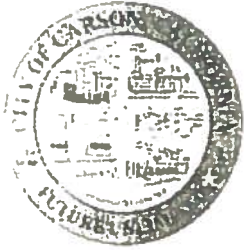
FOR OFFICE USE ONLY:

Date Appeal received: _____, 20____.

Appeal Fee received: \$ _____

Donesia Gause-Aldana, City Clerk

cc: Department Director, File



Appeal Application

City Clerk's Office
701 E. Carson St.
Carson, CA 90745
310-952-1720

Clerk's Date & Time Stamp

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2020 MAY 28 PM 1:15

CITY OF CARSON

Appeals are time sensitive and must be received by the City Clerk in the specified time period pursuant to the Carson Municipal Code or applicable authority. It is advisable to consult with the Department managing the issue if there is question with regards to appealing an action. All fees associated with appeals can be located in the City's Master Fee Schedule and/or Carson Municipal Code. This is an appeal of the:

- ☐ Director decision to the Planning Commission – shall be filed in writing within 15 days of the date of the Director action.
- ☒ Planning Commission decision to the City Council – shall be filed in writing within 15 days of the date of the Commission action.
- ☐ Other - Specify decision-maker, appellate body, Municipal Code authority: _____

Appellant Information:

Name(s): Tetsuo B Kagiwada, Philip M Park and Residents of Imperial Avalon Mobile Estates

Address: 21207 S. Avalon Blvd Space 13 and Space 108

City/State/Zip: Carson, CA 90745

Phone: (818) 312-4932
310-971-1629

Email: kagiwada@hotmail.com
Myongkiev1025@gmail.com

Appealing Application Regarding:

If appeal is made by any member of the City Council or the City Manager, the sections identified with an asterisk () are not required; the Statement of Grounds for Appeal need only provide, in substance and effect, a request that a specific decision, administrative case number, or resolution number, as the case may be, be reviewed by the Planning Commission or City Council, as the case may be. CMC §9173.4.

Name of Applicant(s): Imperial Avalon, LLC Date of Final Decision: May 13, 2020

*Administrative File No. /Case No.: RIR No. 05-20 - Imperial Avalon Mobile Estates

*Street Address (otherwise, the legal description and location of the premises included in the action):
21207 S. Avalon Blvd. Carson, CA 90745

*Specific Matter Being Appealed: The decision of City of Carson Planning Commission approving the Relocation Impact Report (RIR) No. 05-20 and adopting Resolution No 20-2695.

Statement of the Grounds for Appeal (attach separate sheet if necessary):

Please refer to the attached.

Signature of Appellant: _____

Date: May 27, 2020

FOR OFFICE USE ONLY:

Date Appeal received: _____, 20____.

Appeal Fee received: \$ _____

Donesia Gause-Aldana, City Clerk

cc: Department Director, File

May 26, 2020

Ms. Donesia Gause-Aldana, MMC
Clerk of City of Carson
City Hall
701 E. Carson Street
Carson, CA 90745

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2020 MAY 28 PM 1: 16

CITY OF CARSON

Dear City Clerk Gause-Aldana:

Pursuant to City of Carson Municipal Code 9173.4, we, the residents of Imperial Avalon Mobile Home Estates signed below, wish to file an appeal of the May 13, 2020 decision of City of Carson Planning Commission approving the Relocation Impact Report (RIR) No. 05-20 and adopting Resolution No. 20-2695, entitled "A Resolution of the Planning Commission of the City of Carson Approving Relocation Impact Report No. 05-20 for Mitigation of Relocation Impacts of Closure of Imperial Avalon Mobile Estates." The property involved is located at 21207 S. Avalon Blvd, Carson, CA 90745.

WE respectively request at the decision by the commission to be appealed to the City Council per CMC 9173.4A based on the following grounds. In our opinion, the Commission's consideration of the RIR as it related solely to the mitigation of relocation impacts of the residents was conducted unfairly with conclusions reached erroneously, placing the residents at an extreme disadvantage during the entire process, as specifically described below.

1. We believe that the hearing on May 13, 2020, was invalid because of the following reasons.
 - A. Despite of our request to postpone the meeting because of COVID-19 pandemic, it was held online, and calling. Residents were not allowed to physically be at the meeting. Many other people, in other cases, were able to personally speak up at their similar meetings, we were not able to do so. We know that physical presence requirement of public was waived during current state of emergency by the Governor's Executive Order. The Order requires, however, that the government body conducting meeting must notice at least one publicly accessible location for the members of public to observe and offer public comment, and it was not followed. Thus, our right was ignored.
 - B. Many residents in our park are elderly and do not know how the internet works. Even those who were able to participate in the zoom meeting, the sound was not clear, and, with their hearing aids, it was extremely hard to listen to for most of them. For those who tried to listen to the meeting via telephone, it was even more true that they had a hard time to listen to what was being said at the meeting. Therefore, our right was ignored.
 - C. At the beginning of the meeting of the planning commission, the commission members had some other business to do, so they dismissed themselves from the zoom/intercom for over two hours without telling us how long they would be out of the meeting. It was announced to the residents beforehand that the hearing would start at 6:30 pm on the day, so most of the residents who really wanted to speak up, or just to listen, connected their computers/telephones at 6:30 pm, and, as a result, they were made listen to the vacant meeting

for over two hours. Because of the age of the residents, many of them could not pay attention any more after two hours of concentration and had to leave the meeting. Thus, our right was ignored.

- D. At the hearing meeting, the e-mails that were submitted were not read. They were only displayed on the screen for a moment. For those who participated via call-in, it did not make any sense, but were able to hear the chairperson saying "Next." The screen on the zoom was not clear either so it was not readable to many of those who participate. Also, since the e-mails were displayed for such a short period, most of them under 30 seconds, it would not be carefully read even if the screen were clear. In this way, many voices were not heard. Thus, our right was ignored.
- E. We came to be aware that about fifteen letters of opinions that were for the hearing meeting and were dropped off in the mailbox at the city hall, were ignored. It was announced beforehand that the residents could submit their opinions through the mailbox as well, but the planning committee members did not get the letters. So, these voices were not heard at all at the hearing. Thus, our right was ignored.
- F. Since the written comments were not read, the translators could not translate them. So, non-English native speakers in the mobile park had absolutely no idea what was submitted. This clearly violates Government Section 7290-7299.8, as known as Dymally-Alatorre Bilingual Services Act. Thus, our right was ignored.

2. We believe that the appraisals of our homes are wrong because for the following reasons. We ask the city that a fair appraisal based on the fair market value be done.

- A. Mr. Netzer, the appraiser who had done the mobile homes in the park, was appointed by the owner. It is unfair that a neutral professional appraiser did not do the appraisal.
- B. Mr. Netzer did not spend long enough when he visited each home to make the report. For most of the mobile homes, he spent less than twenty minutes, even less than ten minutes for some of the homes. It is so doubtful that he has been able to have a complete appraisal for each home.
- C. The "redo" of the appraisal done by Mr. Branbant was only on the desk and it depended upon the Netzer's report. Mr. Branbant never visited the site to have an actual, complete, and independent appraisal.
- D. The value of the mobile homes is extremely low in the appraisal report. For some of residents who moved in recent years, it does not even pay off their mortgage, so if the proposal gets approved as it is, they will be bankrupt on the day they have to move out.
- E. It seems clear that the appraisal is NOT based on the fair market value. (Please see the attached letter from professional appraisers.) And it DOES violate city's municipal code, section 9128.21. And the fair market value should be based on the value of the home before the eviction process began on September 20, 2019.



- F. The lump sum payment option should not be based of NADA/JD POWER valuation. The mobile homes are not RV's, they are totally different structure so "JD POWER" method is not acceptable.
 - G. At the hearing meeting, it was suggested that Mt. Brabant picks several mobile homes for re-appraising. We do ask the city that ALL mobile homes be re-appraised.
 - H. The value of the home in the report is so low that no resident is able to afford to move to a similar value facility at all. Plus, the prices of mobile homes which the residents are not able to afford is not even a rent-controlled one. Thus, our financial loss is just too much to accept.
 - I. Most of the resident depend on a fixed income. If we are "kicked out" of the current homes with the appraised amount, most of the residents have a great risk of becoming homeless.
3. We believe the relocation distance defined by the owner (50 miles) is too far. We require the city that the city re-consider the area of relocation for the following reasons.
- A. Most of the residents are elderly and it is very hard for them to adjust their lives to a new circumstance. It is essential for those people to see the same doctor, go to the same church, have fellowship with their long-time-friends. 50 miles are just too much for them to commute, to continue having these privileges. If the RIR is accepted as it is, the residents will lose not only their finance but all of these privileges as well.
 - B. If we are to move more than 10 miles from Carson, especially toward Inland Empire, we will lose the climate privilege as well. For those who have lived in the park for many, many years, it is so hard to adjust their body system, because of their age, and will suffer.

We appreciate for your kind consideration on this matter so that all seniors' rights are protected for the safe and peaceful future.

Respectfully Submitted,

The names and signatures are on the following pages.

No.	Unit No.	Signature	Printed Name
1	189	Rosa Doughty	ROSA Doughty
2	93	hiroaki Uchiyama	HIROAKI UCHIYAMA
3	188	TERESITA BAJISTA	TERESITA BAJISTA
4	163	Jun & Aurea CARINEA	Aurea S. Carinea
5	162	SEGISMUNDO GATTI	SEGISMUNDO GATTI
6	37	Guadalupe Meza	Guadalupe MEZA
7	155	DOMINGO BAWE	DOMINGO BAWE
8	38	Florencia Balog	Florencia Balog
9	48	Liza P. Bruner	LIZA P. BRUNER
10	218	Cecile C. Lina	Cecile C. Lina
11	47	Dora Agosto	DORA Agosto
12	202	Linda Lopez	LINDA LOPEZ
13	201	David E. Randall	David E. Randall
14	217	Rogelio M. Santos	ROGELIO SANTOS
15	50	Willie Norman	WILLIE NORMAN
16	51	Imelda Samia	Imelda Samia
17	52	Roberto Mtz And Martha	Martha Maza
18	53	Deanna Glasco	DEANNA GLASCO
19	190	Teodora S. Vicencio	Teodora S. Vicencio

No.	Unit No.	Signature	Printed Name
Signed in the cover page	108		Philip M Park
20	164	Will + Ann Davis	Will + Ann Davis
21	172	Jin Han Lee	ITV Nam Lee
22	12	Michael J Yi	Michael J Yi
23	109	Young S Kim	Young S Kim
	185		Robeny Wimer
24	99	Yong o Kim	YONG o KIM
25	101	Rafael Ruan	RAFAEL RUAN
26	107	Victor H. Hui	VICTOR H. HUI
27	92	Jaya Fradkoff	JAYA FRADKOFF
28	60		IN SIK KOON
29	46	Myung Yong Choi	Myung Yong CHOI
30	204	Byung Rye Min	Byung Rye Min
31	197	Ho Chun Suh	HO CHUN SUH
32	89	Kyung hee Shin	Kyung hee Shin
	5		Christopher Ghim
33	203	Mao Keun Hong	Mao Keun Hong
34	212	FU SHAN LIANG	

No.	Unit No.	Signature	Printed Name
35	#117	_____	Brian Lee
36	#199	Chen Hui-9 Choi	CHEN YU-NOT CHOI
37	#122	Seiko S. Nakajima	SAIKO S. NAKAJIMA
38	#123	Toshiko Kamiyama	Kamiyama, Toshiko
39	#145	Toshiko Takada	TOSHIKOTAKADA
40	#36	_____	SHOGO K. SATO
41	#176	Charles Sekiguchi	CHARLES SEKIGUCHI
42	#139	Wen K. Roh	Wen K. Roh
	#138	Helen Jingles	
43	#138	Helen Jingles	Helen Jingles
44	#90	Jenny H. Lee	Jenny H. Lee
45	88	Yusui Arimura	Yusui Arimura
46	205	Sachiko Ogawa	Sachiko Ogawa
47	11	William C. Chen	WILLIAM C. CHEN
48	13	_____	Tetsuo Kagiwada
49	121	_____	VICTORIA LOPEZ
50	SPH192 -	ROSTRUM JEU FEMIN	FUMIO TOMINO
51	177	IRENIDA CONCEPCION	_____

PROPERTY ADDRESS	UNIT & BUILDING	TYPE & DEFINITION OF VALUE	657
21007 1ST AVE	WISPC89		
CARSON			
RENTAL UNIT		CA	Fee Code 90745

AS OF 03/03/2019 ALL HOMES IN THE SUBJECT COMMUNITY ARE MARKETABLE ONLY FOR RELOCATION TO ANOTHER COMMUNITY. BASED ON THE DATE OF MANUFACTURE THE APPRAISER ESTIMATED 27 HOMES COULD BE RELOCATED. THE APPRAISER IS NOT A LICENSED CONTRACTOR AND CANNOT QUOTE RELOCATION COSTS. RELOCATION COSTS MUST INCLUDE REMOVAL & RESET UP PLUS REPLACEMENT CARPENTRY, PORCHES, PATIOS & SHEDS. THIS LEAVES A MINIMUM OF 262 OWNERS TO BE FULLY COMPENSATED. THE APPRAISER HAS REVIEWED THE APPRAISAL PROVIDED AND FOUND IT SIGNIFICANTLY UNDER VALUED BASED ON A MARKET COMPARISON APPROACH.

AS NOTED IN THE LETTER DATED 03/17/2020 FROM ANDERSON & BRADANT, INC "TYPE & DEFINITION OF VALUE" IS INAPPROPRIATE FOR ADEQUATE COMPENSATION TO THE INDIVIDUAL OWNERS OF ALL HOMES. THE VALUE CHOSEN CLEARLY REPRESENTS THE INTEREST OF OWNERSHIP AND HARMS THE RESIDENT. "INVESTMENT VALUE" IS NOT APPROPRIATE BECAUSE THE VALUE GIVEN MUST BE WHAT THE RESIDENTS WILL BE PAYING IN ANOTHER COMMUNITY WHICH IS "MARKET VALUE". MARKET VALUE IS WHAT ALL LENDERS REQUIRE WHEN MAKING A LOAN, NOT "INVESTMENT VALUE" WHICH IS WELL BELOW MARKET VALUE. AS PER THE "STANDARD RENTAL AGREEMENT" SIGNED BY ALL RESIDENTS ITEM 21 "SUB-LETTING" FORBIDS THE UNIT OWNER TO SUBLEASE OR RENT THEIR HOME TO A THIRD PARTY. THIS IS A THIRD REASON THAT "INVESTMENT VALUE" IS INAPPROPRIATE. INVESTMENT VALUE DOES NOT TAKE INTO CONSIDERATION QUALITY, CONDITION, UPGRADES AND MANY OTHER DIFFERENCES THAT FULL COMPARISON APPRAISAL DOES TO REACH A REALISTIC MARKET VALUE FOR EACH HOME. THIS APPROACH TO VALUE DOES NOT REQUIRE A ONE SIZE FITS ALL NON MARKET VALUE APPROACH. ANY VALUATION FOR THE INDIVIDUAL HOME OWNERS MUST BE A MARKET VALUE BASED ON A "FULL COMPARISON APPRAISAL REPORT" INCLUDING SALES FROM COMPARABLE SENIOR COMMUNITIES IN THE CITY OF CARSON. THERE ARE SIX SENIOR COMMUNITIES IN CARSON AND 5 ARE NOT COMPARABLE BASED ON SIZE, 32-81 UNITS AND LESSER AMENITIES. THE ONLY SENIOR COMMUNITY THAT HAS AN ADEQUATE AMOUNT OF COMPARABLES BASED ON UNIT AGE, QUALITY AND AMENITIES IN COLONY COVE @ 17700 SOUTH AVALON BLVD AND HAS 450 HOMES.

THE VALUE GIVEN IN THE J.D. POWER SUMMARY IS MORE OF AN AS IS COST APPROACH VERSES A REPLACEMENT COST MARKET APPROACH AND IS SIGNIFICANTLY UNDER VALUED. THE ACCESSORIES NOTED ARE SIGNIFICANTLY UNDER VALUED AND IMPOSSIBLE TO REPLACE AT THE VALUES SHOWN.

From:

Residents of Imperial Avalon Mobile Home

Attn: Ben Kagiwada

Philip M Park

RECEIVED
CITY CLERK

2020 MAY 28 PM 1:16

CITY OF CARSON

5/28/20 20
Drop off time
10:46 AM

Appeal Application

TO:

Donesia Gause-Aldana, MMC

Clerk of City of Carson

701 E. Carson Street

Carson, CA 907456



Appeal Application

City Clerk's Office
701 E. Carson St.
Carson, CA 90745
310-952-1720

Clerk's Date & Time Stamp
RECEIVED
CITY CLERK

2020 MAY 28 PM 5:53

CITY OF CARSON

5:53 via email w/o fee

Appeals are time sensitive and must be received by the City Clerk in the specified time period pursuant to the Carson Municipal Code or applicable authority. It is advisable to consult with the Department managing the issue if there is question with regards to appealing an action. All fees associated with appeals can be located in the City's Master Fee Schedule and/or Carson Municipal Code. This is an appeal of the:

- ☐ Director decision to the Planning Commission – shall be filed in writing within 15 days of the date of the Director action.
- ☒ Planning Commission decision to the City Council – shall be filed in writing within 15 days of the date of the Commission action.
- ☐ Other - Specify decision-maker, appellate body, Municipal Code authority: _____

Appellant Information:

Name(s): Tatro & Lopez, LLP on behalf of Imperial Avalon Mobile Estates HOA

Address: 12760 High Bluff Drive, Ste. 240

City/State/Zip: San Diego, CA 92130

Phone: (858) 244-5032 Email: Julie@TatroLopez.com

Appealing Application Regarding:

**If appeal is made by any member of the City Council or the City Manager, the sections identified with an asterisk (*) are not required; the Statement of Grounds for Appeal need only provide, in substance and effect, a request that a specific decision, administrative case number, or resolution number, as the case may be, be reviewed by the Planning Commission or City Council, as the case may be. CMC §9173.4.*

Name of Applicant(s): Imperial Avalon, LLC Date of Final Decision: May 13, 2020

*Administrative File No. /Case No.: No. 05-20

*Street Address (otherwise, the legal description and location of the premises included in the action) Imperial Avalon Mobile Estates; 21207 Avalon Blvd., Carson, CA 90745

*Specific Matter Being Appealed: Hearing on Relocation Impact Report (RIR) 05-20 -Imperial Avalon Mobile Estates

Statement of the Grounds for Appeal (attach separate sheet if necessary): See attached.

Signature of Appellant: [Signature] Date: May 28, 2020

FOR OFFICE USE ONLY:

Date Appeal received: _____, 20____.

Appeal Fee received: \$ _____

Donesia Gause-Aldana, City Clerk

cc: Department Director, File

Supplement

Statement of Grounds for Appeal
Hearing Date: May 13, 2020
No. 05-20

The Imperial Avalon Homeowners Association (HOA) files this precautionary appeal of the Planning Commission's recent approval of the park owners' Relocation Impact Report submittal (No. 05-20). There are still many unresolved issues, no proposed Resolutions have been circulated yet, and negotiations between the City, the park owner, and the residents are ongoing.

Therefore, subject to further clarifications and compromises that may allow for withdrawal of this appeal at a later time, the HOA identifies the following non-exhaustive grounds for appeal:

- 1) The Planning Commission hearing on May 13, 2020 did not comport with CMC 9128.21 (D), pertinent provisions of the Government Code and the California Mobilehome Residency Law in that stay-at-home orders during the Covid-19 pandemic prevented in-person and meaningful participation by park residents who are within a high-risk group of citizens due to age and pre-existing conditions. The HOA had requested, in writing, that the hearing be postponed until after the lockdown orders were lifted so that the hearing could proceed as intended. The City denied that request. Moreover, the statewide prohibitions on large gatherings and lockdown orders prevented residents from meeting with their counsel and inhibited residents' ability to vet the appraisal work submitted in advance of the hearing. There was no urgency to hold the hearing on May 13th, as the park is not scheduled to close before 2022, and the 30-day deadline for considering the RIR submittal could have easily been suspended during the forced shutdown of virtually all businesses and non-essential City services.
- 2) In preparing the Relocation Impact Report, the park owner and Overland Pacific & Cutler did not utilize the appraiser selected by the City to calculate the underlying appraised values of the mobilehomes at Imperial Avalon, utilizing instead an appraiser selected by the park owner, in violation of CMC 9128.21 (C)(6).
- 3) The mitigation measures proposed by the park owner and considered by the Planning Commission did not include the full panoply of mitigation options that the Planning Commission is supposed to evaluate under CMC 9128.21 (E), and therefore did not adequately address all the adverse impacts of park closure—as required by the Mobilehome Residency Law—stemming from the loss of resident homes, the loss of all equity in their homes, and the inability of residents to find adequate and comparable replacement housing with the limited relocation measures proposed in the Relocation Impact Report.

Joy Simarago

From: Cristal Mcdonald
Sent: Thursday, May 28, 2020 6:00 PM
To: Joy Simarago
Subject: FW: Appeal Application (Planning Commission 5/13/2020 hearing on Relocation Impact Report 05-20 - Imperial Avalon Mobile Estates)
Attachments: FIANL AppealApplication09-05-28-2020 (Signed).pdf
Importance: High

From: julie@tatrolopez.com [<mailto:julie@tatrolopez.com>]

Sent: Thursday, May 28, 2020 5:53 PM

To: CityClerk

Subject: Appeal Application (Planning Commission 5/13/2020 hearing on Relocation Impact Report 05-20 - Imperial Avalon Mobile Estates)

Dear Carson City Clerk,

Please find the attached Appeal of the hearing on Relocation Impact Report 05-20 - Imperial Avalon Mobile Estates. Please confirm receipt of this email at your earliest convenience.

Thank you.

Julie Lopez, Esq.

Tatro & Lopez, LLP

12760 High Bluff Dr., Ste. 210

San Diego, CA 92130

E-mail: julie@TatroLopez.com

Web: www.TatroLopez.com

Tel: 858.244.5032

In response to the COVID-19 crisis, we are working remotely to help protect you, our staff, and our community. We are actively working at full capacity for our clients, and accepting new inquiries. Don't hesitate to reach out now with questions or if you need assistance. We are here for you. Stay healthy.

This message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy, forward, or disclose to anyone 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 at julie@TatroLopez.com, and delete the message. Thank you very much.

June 8, 2020

Tetro & Lopez
12760 High Bluff Drive, Suite 240
San Diego, CA 92130

Dear Julie and Tim:

Effective today, June 8, 2020, The Board of Directors of the Imperial Avalon Homeowners Association has agreed that the services of your firm, Tatro & Lopez will no longer be needed in regard to the closure of our mobile home park, Imperial Avalon in Carson, CA.

We know you did your best with what little you had to work with and we appreciate your efforts on our behalf. Unfortunately for the residents, it appears that the park closure was fully supported by the City and there was not anything anyone could do to stop it.

Please submit your final invoice so that we can issue payment to you in a timely fashion.

Again, thank you for all your time and hard work.

Sincerely,

A handwritten signature in black ink that reads "Peggy Anderson". The signature is written in a cursive, flowing style.

Peggy Anderson, HOA President
Imperial Avalon, LLC with the approval of:
Melony Lang, HOA Representative
Karen Bolin, Security
Marilyn Ryder, Treasurer
Larry Lieurance, Social Chairman

From: Sunny Soltani
Sent: Thursday, June 11, 2020 10:23 AM
To: Tim Tatro <tim@tatrolopez.com>; julie@tatrolopez.com
Cc: Naaseh, Saied (snaaseh@carson.ca.us) <snaaseh@carson.ca.us>; Benjamin R. Jones <bjones@awattorneys.com>
Subject: FW: status

Tim and Julie-

Can you please respond. We have a number of issues we need to discuss regarding the appeals and I need to know who we correspond with. If I don't hear back from you by 2:00 today I will assume you no longer represent the residents.

Thanks,
Sunny

From: Sunny Soltani
Sent: Tuesday, June 9, 2020 4:31 PM
To: Tim Tatro <tim@tatrolopez.com>; julie@tatrolopez.com
Cc: Benjamin R. Jones <bjones@awattorneys.com>
Subject: status

Hey Tim and Julie-

We are in receipt of this letter. I have been informed by some residents that they want to directly deal with the park owner and/or hear settlement opportunities personally and not through any law firm. I also understand from some other residents that your firm has advocated for residents to form another HOA to hire you back up. Can you provide any insight about what your role is currently.

Thanks,
Sunny

June 8, 2020

Tetro & Lopez
12760 High Bluff Drive, Suite 240
San Diego, CA 92130

Dear Julie and Tim:

Effective today, June 8, 2020, The Board of Directors of the Imperial Avalon Homeowners Association has agreed that the services of your firm, Tatro & Lopez will no longer be needed in regard to the closure of our mobile home park, Imperial Avalon in Carson, CA.

We know you did your best with what little you had to work with and we appreciate your efforts on our behalf. Unfortunately for the residents, it appears that the park closure was fully supported by the City and there was not anything anyone could do to stop it.

Please submit your final invoice so that we can issue payment to you in a timely fashion.

Again, thank you for all your time and hard work.

Sincerely,

A handwritten signature in black ink that reads "Peggy Anderson". The signature is fluid and cursive, with the first name "Peggy" being more prominent than the last name "Anderson".

Peggy Anderson, HOA President
Imperial Avalon, LLC with the approval of:
Melony Lang, HOA Representative
Karen Bolin, Security
Marilyn Ryder, Treasurer
Larry Lieurance, Social Chairman

From: Sunny Soltani
Sent: Monday, June 15, 2020 11:19 AM
To: Tim Tatro <tim@tatrolopez.com>
Cc: Thorpe-Lopez Julie <julie@tatrolopez.com>; Naaseh, Saied (snaaseh@carson.ca.us) <snaaseh@carson.ca.us>; Benjamin R. Jones <bjones@awattorneys.com>
Subject: RE: status update

As I understood your ask it was "if Brabant had been left to his own devices with the flexibility to use any approach or methodology whatsoever he wanted and he was not conducting a peer review and was not given any assumptions how would he have appraised the "in place values" of the units and how would his numbers under this sample come out. That is what he was tasked with.

I look forward to hearing back from you on the other issues Tim.

From: Tim Tatro <tim@tatrolopez.com>
Sent: Sunday, June 14, 2020 12:04 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Cc: Thorpe-Lopez Julie <julie@tatrolopez.com>; Naaseh, Saied (snaaseh@carson.ca.us) <snaaseh@carson.ca.us>; Benjamin R. Jones <bjones@awattorneys.com>
Subject: Re: status update

*** EXTERNAL SENDER ***

Hi Sunny,

I appreciate your reply. I will respond to the issues you've raised within a day or two. But I wanted to address the Brabant issue right away because that is the most time-sensitive thing here.

When we last spoke about the proposal to have him do some spot appraisals in the park, you indicated that it was a "reasonable ask," but that you wanted to think about it. I appreciate the fact that you've decided to move forward with that approach, but I was waiting to hear back from you on that so that we could schedule a joint call with Mr. Brabant. It sounds like you've already spoken to him. But it's vitally important to me that I am part of the conversation with him that outlines the scope of this assignment. I need to be able to report to my clients on that issue based on first-hand knowledge, not based on what's been reported to me by someone else. Therefore, I think we need to set up a brief conference call with Mr. Brabant as soon as possible. I need to be crystal clear on what he understands the ground rules to be, what his assumptions are, and what restrictions he thinks he's under, if any, and that conversation needs to happen BEFORE he starts putting pencil to paper. The next phase of his work on this assignment is likely to be the lynch-pin to the entire project and may dictate whether the RIR survives or not.

Again, I promise I'll respond to the HOA-related issues you've raised. But I wanted to address the Brabant issue immediately to minimize the risk of him having to start over. I think you and I would only need about 10 minutes with him. I can make time for this on Monday (anytime after 1:00 p.m.), Tuesday (anytime between 10:00 a.m. and 12:30 p.m., or after 3:00 p.m.), or Wednesday after 3:00 p.m. Please advise as to which of these days and times works best for you. This is really important.

Appreciatively,

Tim Tatro

Tatro & Lopez, LLP
12760 High Bluff Drive, Suite 240
San Diego, CA 92130-2018
E-mail: Tim@TatroLopez.com
Web: www.TatroLopez.com
Tel: 858.244.5032 Fax: 858.847.0032

This message contains information that may be confidential and privileged. If you are not the named addressee, please do not print, copy, retransmit, disseminate, or otherwise use this information. If you have received this message in error, please notify the sender by reply e-mail at Tim@TatroLopez.com and delete the message. Thank you very much.

On Jun 14, 2020, at 11:12 AM, Sunny Soltani <ssoltani@awattorneys.com> wrote:

Tim-

Thanks for your email. See my responses/questions below -in red. I think we need to set up a call to get on the same page on Wednesday. Monday and Tuesday are really bad for me and I want to provide you with a chance to analyze my comments so we can discuss on our call.

From: Tim Tatro <tim@tatrolopez.com>
Sent: Thursday, June 11, 2020 10:31 AM
To: Sunny Soltani <ssoltani@awattorneys.com>
Cc: Thorpe-Lopez Julie <julie@tatrolopez.com>; Naaseh, Saied (<snaaseh@carson.ca.us>
<snaaseh@carson.ca.us>; Benjamin R. Jones <bjones@awattorneys.com>
Subject: Re: status update

*** EXTERNAL SENDER ***

Sunny,

The Imperial Avalon Mobile Estate HOA recently held elections and voted in a new board. This was necessary for several reasons, including the loss of several prior board members and Peggy Anderson's health issues which were understandably complicating her ability to effectively serve as HOA President. To close the loop, the remaining prior board members tendered their resignations and sent the termination letter to us that was apparently shared with you. The new board has asked Tatro & Lopez to continue serving as counsel for the HOA's membership.

Given the sufficient confusion around this, the City needs a letter from the HOA confirming you represent the HOA. We would also like to know who the new board members are.

We will be formalizing the lines of communication to avoid confusion. I know you have friends in the park, but I would ask you to refrain from communicating with any Imperial Avalon residents outside our presence regarding any of the park closure issues from this point forward. I can't imagine that you would want me contacting the Mayor, the Planning Commission, or any of the City Council members directly. And to the extent any other attorney-client written communications have been forwarded to you, please provide me with copies of everything within 5 business days.

I don't believe just because you represent the HOA all residents of the park have to consent to be represented by you. If I'm incorrect please provide me any legal authority to the contrary. In fact, unless you provide me with legal authority to the contrary, I'd ask you to provide me with a letter of representation executed by each individual resident in the park you represent. As you point out in your email below we are unsure as to who is a member of the HOA and who is not. The City has concerns about the status of the HOA and its membership. It is very unclear. So I need your help clarifying who you precisely represent. As a side note, I used to represent Mobilehome Park HOA's – two matters (one was the famous Pacific Palisades park conversion case which made it all the way to the CA Supreme Court and I drafted the amicus brief and represented the HOA in that matter; and 2) the Indian Springs Mobilhehome Park Homeowners' Association in several matters). I never put a gag order on residents to talk to the City – including the City Attorney. Because I always viewed the law as the residents should have access to their public officials. I understand in the case you represented the HOA in (De Anza), the Mobilehome park was owned by the City and that City was not treating their residents well. But we have a different relationship with our residents in this City Tim. We deeply care about them and have always been sued by park owners for being too resident friendly. With all of that said, of course I would respect what the rules of professional conduct say about communications with the residents if they are represented by an attorney. I've never researched whether an HOA attorney can put a gag order on ALL residents' line of communications with the City and the City attorney's office. But again, I'm open to reviewing any legal authority regarding this issue. Otherwise, I look to you to inform the City exactly and specifically which residents you represent. P.s. I don't have any attorney client communications – only the termination letter I forwarded to you.

Please let me know when Mr. Brabant will be permitted to conduct the test sample appraisals we discussed last week. This is a critical piece of the puzzle without which we cannot support the current RIR, even with the additional modifications that have been negotiated.

You asked for a test sample of 10 spaces if Jim Brabant had done the analysis of "in place" values himself instead of doing a peer review of Netzer's. I have asked him to run 20 spaces and I will have a call scheduled with him the end of next week to go over his analysis.

To the extent you feel there are park residents who are voluntarily opting out of any connection to the HOA and who have expressly stated to you that they prefer to proceed in pro per, please identify these residents by name and space number so that we can make sure our membership roster is current. No one is forced to participate in the HOA. But because of challenges that the HOA has had in communicating with the residents over the past several months during the quarantine period, and erroneous rumors that the HOA had disbanded, we need to be sure that those who may be expressing interest in dealing directly with the owner understand that there is an HOA, and that they have the option of participating with legal representation.

See my response above – I believe this is the other way around. Residents need to opt in the HOA representation. And it is your responsibility to figure out who you represent. I have not returned any calls and I have told residents who have tried to talk to me that you have asked me not to talk to any park residents. I'm mindful I may totally be ignorant on this issue so I will refrain talking to anyone until you and I figure this issue out. Also, I have been informed that the park owner facilitated a meeting between you and the park residents. If the parkowner is giving you any trouble in communicating with the residents please let us know. The City would be more than happy to assist to make sure you can have access to all the residents.

Moreover, the need for consistency still dictates that any settlement discussions should be supervised to ensure that the terms reached are universal and comport with the minimum mitigation requirements that are ultimately required by the City Council, the Carson ordinance, and the MRL. There cannot be any secret deals; that's a recipe for abuse. At a bare minimum, if something is negotiated outside our purview, it has to be reviewed by the Special Master. Please confirm that you and Ben have secured from Faring all such agreements negotiated to date as we previously discussed.

I was waiting to get a list of "special Masters" from you. Remember I asked you for suggestions to ensure we make the park owner retain someone your firm supports. We have requested to see the private agreements. Have not received them yet. FYI, I have added language in the conditions of approval that any private settlements cannot be less than what the Planning Commission approved.

Julie and I remain committed to working with you towards a mutually acceptable outcome.

The City remains committed to its Mobilehome Park residents and will work diligently on their behalf as it has over the last several decades. The City welcomes you on board and hopes you don't let your experience in De Anza shape the way you approach the City of Carson. We have one common goal (I hope) to protect the residents without confusion and division.

Sincerely,

Tim Tatro

Tatro & Lopez, LLP
12760 High Bluff Drive, Suite 240
San Diego, CA 92130-2018
E-mail: Tim@TatroLopez.com
Web: www.TatroLopez.com
Tel: 858.244.5032 Fax: 858.847.0032

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On Jun 11, 2020, at 10:22 AM, Sunny Soltani <ssoltani@awattorneys.com> wrote:

Tim and Julie-

Can you please respond. We have a number of issues we need to discuss regarding the appeals and I need to know who we correspond with. If I don't hear back from you by 2:00 today I will assume you no longer represent the residents.

Thanks,
Sunny

From: Sunny Soltani
Sent: Tuesday, June 9, 2020 4:31 PM
To: Tim Tatro <tim@tatrolopez.com>; julie@tatrolopez.com
Cc: Benjamin R. Jones <bjones@awattorneys.com>
Subject: status

Hey Tim and Julie-

We are in receipt of this letter. I have been informed by some residents that they want to directly deal with the park owner and/or hear settlement opportunities personally and not through any law firm. I also understand from some other residents that your firm has advocated for residents to form another HOA to hire you back up. Can you provide any insight about what your role is currently.

Thanks,
Sunny
<Letter to Tetro ^0 Lopez 060820 FINAL.docx>

From: Sunny Soltani
Sent: Thursday, June 18, 2020 1:37 PM
To: Cookie Choi <cookiecastle617@gmail.com>
Cc: CityClerk <cityclerk@carson.ca.us>; Benjamin R. Jones <bjones@awattorneys.com>; Naaseh, Saied (<snaaseh@carson.ca.us>) <snaaseh@carson.ca.us>
Subject: RE: Imperial Avalon Mobile Estate

The appeal was not dismissed. The Mayor has appealed the matter and all residents will have an opportunity to be heard on appeal. The City is not charging the residents for the appeal since there is already an appeal by the Mayor but all your concerns can be raised in the same appeal. City is not responding to the park owner on the other issues in his letter because his letter is irrelevant and moot since the Mayor has filed the appeal. Hope that helps clarify. If you have any questions please feel free to call me on (949) 533-8155.

From: Cookie Choi <cookiecastle617@gmail.com>
Sent: Thursday, June 18, 2020 1:25 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Subject: Imperial Avalon Mobile Estate

*** EXTERNAL SENDER ***

Hi,

My name is Cookie Choi. My mom is a resident (spc.199) at Imperial Avalon. I'm writing to express concerns and ask some questions.

My mom is one of 53 signee of the resident appeal that was canceled. With a few community leaders forefront, preparing an appeal document was not easy with no access to legal advisors. Filing was a tremendous accomplishment, and an arduous process.

How was residents' appeal dismissed? A short letter from land owner's attorney objecting filing deadline. Feeling of defeat and disappointment is ensued from land owner attorney's condescending letter. I have no intention to renege city's decision to abolish but to gain a better understanding.

Is there a special rule to count "15 days" on Carson City Code?

On a bright note, my mom heard residents talking about a "better deal". Per residents, "better deal" came from City Attorney and you have a plan to convene residents to present the deal.

What is content of this "better deal", will it alleviate distend frustration?

Thank you,

Cookie Choi

From: Sunny Soltani
Sent: Thursday, June 18, 2020 3:21 PM
To: Benjamin R. Jones <bjones@awattorneys.com>; Myongkiev1025@gmail.com; kagiwada@hotmail.com
Cc: Donesia Gause <dgause@carson.ca.us>
Subject: RE: Response to Your Letter re Imperial Avalon RIR Appeal

Dear Messrs. Park and Kagiwada,

The City of Carson's City Council is unanimously and extremely committed to its Mobilehome Park residents. The Mayor had specific issues and concerns regarding the Planning Commission's decision and as a result filed an appeal. He also felt that if he files an appeal, then your monies can be returned and you can be heard under his appeal.

So as Ben clarifies your appeal is not deemed untimely. No decision is made on the park owners' request to deem your appeal untimely because it is irrelevant. The City is having an appeal under the Mayor's appeal and **ALL RESIDENTS will have an opportunity to be heard for free.**

Thanks,
Sunny Soltani,
City Attorney
(949) 533-8155

From: Benjamin R. Jones <bjones@awattorneys.com>
Sent: Thursday, June 18, 2020 2:49 PM
To: Myongkiev1025@gmail.com; kagiwada@hotmail.com
Cc: Sunny Soltani <ssoltani@awattorneys.com>; Donesia Gause <dgause@carson.ca.us>
Subject: Response to Your Letter re Imperial Avalon RIR Appeal

Dear Messrs. Park and Kagiwada,

The City of Carson is in receipt of your attached letter. It appears you have misunderstood the City's June 16, 2020 letter regarding the administrative appeals in the Imperial Avalon RIR matter, so I am writing to clear up any confusion.

The City did not deem your appeal untimely. The purpose of the City's letter was merely to inform you that the City will proceed with conducting the City Council appeal hearing based on the Mayor's appeal, which was complete as of May 27, 2020, and that the City therefore did not need to make any determination on the contentions of the Park Owner's attorney regarding the timeliness of your appeal or the other appeals.

To be clear, the approach described in the City's June 16 letter will not deprive you or the other residents who signed the petition in your appeal of any right to be heard through the City Council appeal hearing process, but this way, you will also receive a full refund of your appeal fee.

If you have any questions regarding this matter, please do not hesitate to contact City Attorney Sunny Soltani, copied here. Thank you.

Benjamin R. Jones | Associate, Assistant City Attorney of Carson

Aleshire & Wynder, LLP | 18881 Von Karman Ave., Suite 1700, Irvine, CA 92612

Tel: (949) 223-1170 | Dir: (949) 250-5430 | Fax: (949) 223-1180 | bjones@awattorneys.com | awattorneys.com

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via email and delete the email you received.

From: Campbell Lee <bblipad@gmail.com>
Sent: Monday, June 29, 2020 6:46 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Cc: Benjamin R. Jones <bjones@awattorneys.com>; Saied Naaseh - City of Carson (snaaseh@carson.ca.us) <snaaseh@carson.ca.us>
Subject: RE: Guarantee the purchase price.

*** EXTERNAL SENDER ***

My Escrow paper copy attachment.

[TypeApp](#)에서 전송

2020년 6월 29일, 오후 1:50, Sunny Soltani <ssoltani@awattorneys.com> 작성:

The escrow papers are great! Thank you. I will make sure to make your email part of the record.

From: Campbell Lee <bblipad@gmail.com>
Sent: Monday, June 29, 2020 1:49 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Cc: Benjamin R. Jones <bjones@awattorneys.com>; Saied Naaseh - City of Carson (snaaseh@carson.ca.us) <snaaseh@carson.ca.us>
Subject: RE: Guarantee the purchase price.

*** EXTERNAL SENDER ***

Dear,

Sunny Soltani

I was a paid \$310,000 for bought it this mobile home on July.28.2018 And I have a escrow papers.

[TypeApp](#)에서 전송

2020년 6월 29일, 오후 1:42, Sunny Soltani <ssoltani@awattorneys.com> 작성:

Thank you Brian. Do you have a proof of purchase at the \$310,000 purchase price? As you are aware, Mayor Albert Robles has also appealed the Planning commission decision and one of the issues that the Mayor deeply cared about was making sure individuals who have purchased in the last 5 years in the park be made completely whole. Your situation is exactly one of the situations that the Mayor wants to make sure is addressed. Proof of purchase at the \$310,000 will help him argue the position at the Council hearing. I will submit your letter into the record and please again note, your situation is exactly one of the issues that Mayor Albert Robles wants addressed at the council meeting so your email is very helpful and timely.

From: Campbell Lee <bblipad@gmail.com>
Sent: Monday, June 29, 2020 1:26 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Subject: Guarantee the purchase price.

*** EXTERNAL SENDER ***

Dear,

Sunny Soltani

City Attorney

City of Carson

My name is Brian Lee and alongside my wife, currently resident in Imperial Avalon Mobile Estates with the address as follows

21207 Avalon Blvd. Spc 17.

Carson, CA 90745.

Prior to moving into Avalon Mobile Estates, my wife and I have lived a frugal life and thus decided to purchase a mobile home with our roughly \$310,000 of life savings.

A year and two months after the sale, a real estate development company purchased the land held by Imperial Avalon Mobile Estates. Shortly after the purchase, the company had announced that the property would be cleared and redeveloped, hence all residents had to move out by a certain date. Avalon Mobile Estates residents had expected to live out the rest of their lives in relative peace, but with the new announcement, residents were given offers for their homes to be bought at 65% of market price. For some residents, the reality they face by January 2022 is that they are forced to sell property that they had not planned on selling in their lifetime, property of which that has depreciated in value, and will be bought below market prices. Essentially, the real estate company is asking of its residents to sell off their homes for money that cannot support them in most other residency areas.

The price of our home upon purchase was \$310,000, and having lived in it for only 14 months, we were being asked to leave at \$230,000. This is an \$80,000 loss in capital which we cannot afford to lose, therefore we are unable to accept the offer at this price. If the development company wishes for us to move off the property, then we must be offered no less than the valuation of the home on 2018 at \$310,000. I ask that the City of Carson, its council, and the park owners be forwarded this letter.

Sincerely,

Brian Lee

Imperial Avalon mobile estates

21207 Avalon Blvd Spc 17

Carson, CA 90745

[TypeApp](#)에서 전송



Crest Escrow
Services

1455 Crenshaw Blvd., Suite 100
Torrance, CA 90501
Phone: (310) 328-9427
Fax: (310) 328-4806

CREST ESCROW SERVICES IS LICENSED BY THE DEPARTMENT OF BUSINESS OVERSIGHT
OF THE STATE OF CALIFORNIA, LICENSE NUMBER 963 0954

MOBILEHOME ESCROW INSTRUCTIONS
Virginia L. Mowrer
Escrow Officer

Escrow No.: 031570-VM
Date: May 7, 2018

The Buyer(s) shown herein are purchasing a mobilehome described below from the Seller herein on the terms, conditions and instructions hereinafter stated and will hand you (Escrow Holder) or will cause to have handed to you the consideration as follows:

Buyer has handed CREST ESCROW SERVICES an initial deposit in the amount of 3,000.00
Buyer will hand you an additional deposit in the form of a Cashiers Check payable
to Crest Escrow Services OR WIRED FUNDS FIVE DAYS PRIOR TO THE CLOSE OF ESCROW
DATE in the amount of 307,000.00

Total Consideration \$310,000.00

Buyer(s) will had you any additional funds and/or documents required to enable you to comply with these instructions, which you are authorized to use and/or deliver provided you can hold and/or comply with the following:

1. OWNERSHIP CERTIFICATE AND REGISTRATION CERTIFICATE(S) COVERING THE FOLLOWING DESCRIBED MOBILEHOME:

TRADE NAME: GOLDEN WEST
DATE OF MANUFACTURE: 05/25/2016
SERIAL NO(S): PER037397CAA/PER037397CAB
SIZE: Length 65 ft. X Width 13 ft. 6 in. and an additional
Length 65 ft X Width 13 ft 6 in
DOH LABEL NO(S): RAD1519764/RAD1519765
DECAL NO(S): LBM7870

Located at: 21207 AVALON BLVD., SPACE 17, CARSON, CA 90745
Space #: 17

*Buyers
Copies*

2. REGISTERED OWNERSHIP to the mobilehome and other related property to be as follows:

BONG K. LEE and HAE S. LEE(Exact Manner in which Mobilehome is to be Registered to be Handed
Escrow Holder in writing prior to close of escrow)

3. PREPARE A Bill of Sale covering the herein described mobilehome.

4. This escrow is contingent upon the Buyer(s) receiving approval by the Park Management for: (a) the mobilehome described herein to remain in its present location, (b) receipt by the Buyer(s) of the rules and regulations of the Park, (c) tenancy in the Park. Deposit into escrow of a fully executed copy of the Park Rental Agreement and/or Park Approval will be deemed a waiver of this contingency.

5. All parties hereto are aware of the fact that the mobile home which is the subject of this escrow is currently listed on the TAX ROLLS OF THE LOS ANGELES COUNTY TAX COLLECTOR and is subject to taxation assessment by that agency. In the event this escrow provides for the same, you are to pro-rate taxes based on the figures available to you at the time of closing. Seller agrees to furnish you with the same. Each of the parties agree to hold CREST ESCROW SERVICES free and clear of any and all liability as to any discrepancies which may occur in the tax pro-ration herein as a result of the issuance of a revised or supplemental tax bill from the Tax Collector's office, and understands that the subject property WILL BE re-assessed upon documentation to the Department of Housing that a TAX CLEARANCE CERTIFICATE from the Los Angeles County Tax Collector will be required by them. Seller herein agrees to cause the same to be handed you before this escrow is closed. All parties are aware of the fact that this escrow WILL NOT be closed until such time as the same has been properly deposited herein. Due to the fact that the subject mobile home is assessed for taxes there will be NO SALES TAX charged to the buyer in connection with this transaction. Buyer acknowledge that it is his/her their responsibility to secure any tax bills after the close of this escrow and that they will be responsible for payment of any taxes falling due after the close of escrow directly to the property tax authority.

(CONTINUED)

Seller's Initials: _____

Buyer's Initials: *BL/L*



*Crest Escrow
Services*

1455 Crenshaw Blvd., Suite 100
Torrance, CA 90501
Phone: (310) 328-9427
Fax: (310) 328-4806

Virginia L. Mowrer
Escrow Officer

Date: May 22, 2018
Escrow No.: 031570-VM

AMENDED ESCROW INSTRUCTIONS

Property Address: 21207 AVALON BLVD., SPACE 17, CARSON, CA 90745

THE ABOVE NUMBERED ESCROW IS HEREBY AMENDED AND/OR SUPPLEMENTED AS
FOLLOWS:

**FROM COMMISSION DUE THE UNDERSIGNED BROKER AT THE CLOSE OF THE ABOVE
REFERENCED ESCROW, YOU ARE AUTHORIZED AND INSTRUCTED TO CREDIT BUYERS HEREIN
THE SUM OF \$2,000.00**

ALL OTHER TERMS AND CONDITIONS TO REMAIN THE SAME.



BONG K. LEE

HOME TEAM REALTY

HAE S. LEE

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM7870

Manufacturer ID/Name 1126458 CMH MANUFACTURING WEST INC	Trade Name GOLDEN WEST	Model CK SERIES 71CK127661AH16	DOM 05/25/2016	DES 07/21/2016	RV
Serial Number PER037397CAA PER037397CAB	Label/Insignia Number RAD1519764 RAD1519765	Weight 23,100 23,100	Length 65' 65'	Width 13' 6" 13' 6"	Issued Dec 05, 2018

Addressee

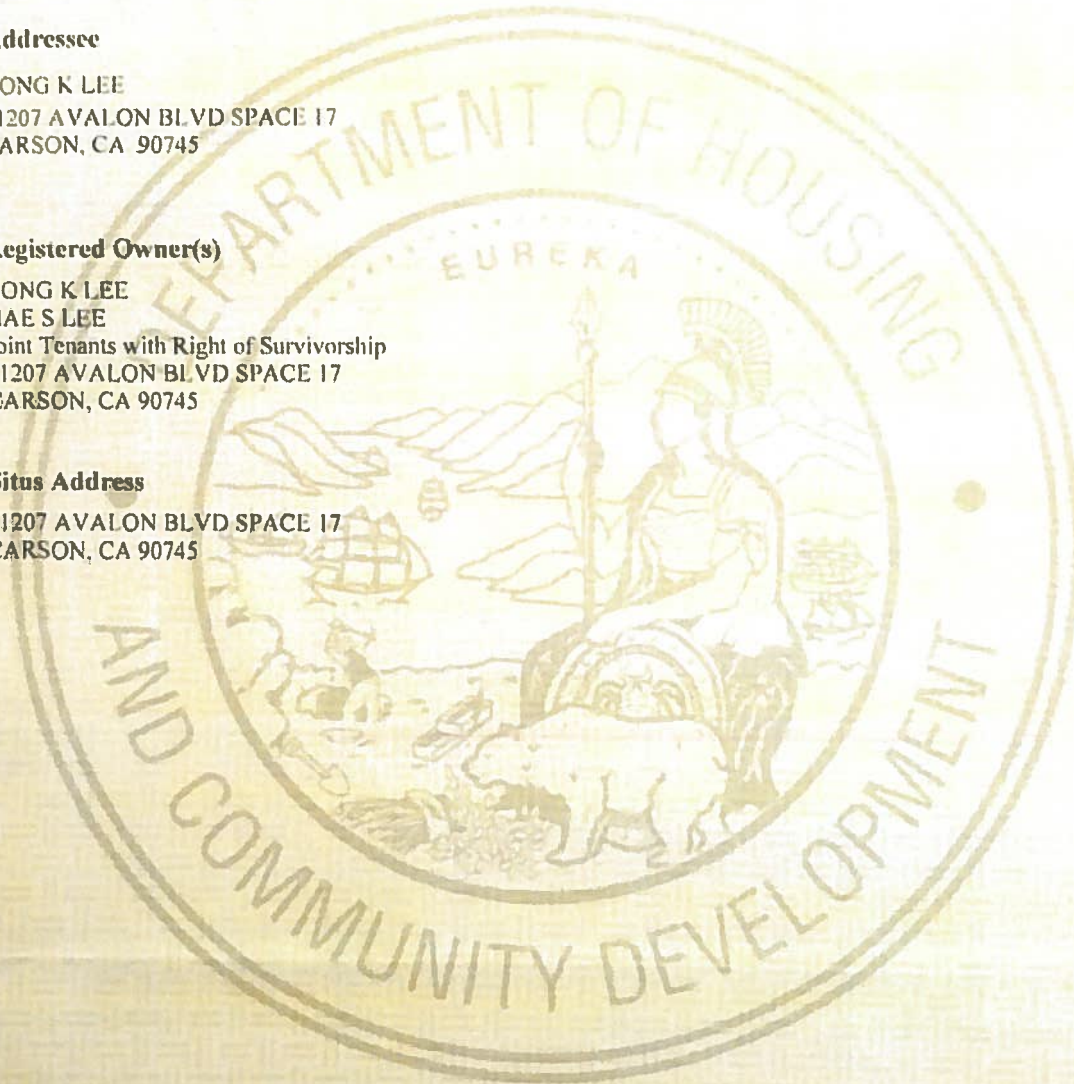
BONG K LEE
21207 AVALON BLVD SPACE 17
CARSON, CA 90745

Registered Owner(s)

BONG K LEE
HAE S LEE
Joint Tenants with Right of Survivorship
21207 AVALON BLVD SPACE 17
CARSON, CA 90745

Situs Address

21207 AVALON BLVD SPACE 17
CARSON, CA 90745



IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

From: Sunny Soltani
Sent: Monday, June 22, 2020 10:11 PM
To: Cookie Choi <cookiecastle617@gmail.com>
Cc: Benjamin R. Jones <bjones@awattorneys.com>
Subject: RE: FW: Imperial Avalon

Thank you Cookie. We will raise all these issues to the Council on appeal.

From: Cookie Choi <cookiecastle617@gmail.com>
Sent: Monday, June 22, 2020 4:20 PM
To: Sunny Soltani <ssoltani@awattorneys.com>
Subject: Re: FW: Imperial Avalon

*** EXTERNAL SENDER ***

Hi,
I sent you 2 emails using my cell phone device this morning. I left out a jpg attachment on the original email so, seconds later I sent you a jpg attachment on it's own.
Sorry for the confusion. Perhaps you didn't get the original message. I'll copy paste the original message for better understanding.

Hi,
Park residents been hyping about third-party appraiser Guy Hall, who asserted that the method used to value coaches at the Park is not fitting. Attached is an appraisal report by Guy Hall (714)296-4075. Please examine if the valuation method applied by the Land Owner's appraiser is a fair one, similarly, examin if Hall's asserment of Replacement Cost Market Approach is viable. Because the disparities between Investment Value Method and Market Value Method pose immense gap in coach value, to protect the interest of residents' personal property it is pertinent to seek expert advice.
Many residents are livid over the fact that their property is valued at a scrap metal. Dire matter calling for City of Carson to mitigate adverse effect of relocation. Rectify upon findings, for many hope this argument be an inflexction point.
Thank you,
Cookie Choi

On Mon, Jun 22, 2020 at 12:15 PM Sunny Soltani <ssoltani@awattorneys.com> wrote:

Hi Cookie-

Thank you for your email. We will review. Are these notes by you? Can you please give us context regarding the source of the document.

From: Cookie Choi <cookiecastle617@gmail.com>

Sent: Monday, June 22, 2020 9:36 AM

To: Sunny Soltani <ssoltani@awattorneys.com>

Subject: Imperial Avalon

*** EXTERNAL SENDER ***

From: Cookie Choi <cookiecastle617@gmail.com>
Sent: Monday, June 22, 2020 9:35 AM
To: Sunny Soltani <ssoltani@awattorneys.com>
Subject: Imperial Avalon

*** EXTERNAL SENDER ***

Hi,

Park residents been hyping about third-party appraiser Guy Hall, who asserted that the method used to value coaches at the Park is not fitting. Attached is an appraisal report by Guy Hall (714)296-4075.

Please examine if the valuation method applied by the Land Owner's appraiser is a fair one, similarly, examine if Hall's assertion of Replacement Cost Market Approach is viable. Because the disparities between Investment Value Method and Market Value Method pose immense gap in coach value, to protect the interest of residents' personal property it is pertinent to seek expert advice.

Many residents are livid over the fact that their property is valued at a scrap metal. Dire matter calling for City of Carson to mitigate adverse effect of relocation. Rectify upon findings, for many hope this argument be an inflexion point.

Thank you,
Cookie Choi

From: Sunny Soltani
Sent: Monday, June 22, 2020 12:15 PM
To: Benjamin R. Jones <bjones@awattorneys.com>; Cookie Choi <cookiecastle617@gmail.com>
Subject: FW: Imperial Avalon

Hi Cookie-

Thank you for your email. We will review. Are these notes by you? Can you please give us context regarding the source of the document.

From: Cookie Choi <cookiecastle617@gmail.com>
Sent: Monday, June 22, 2020 9:36 AM
To: Sunny Soltani <ssoltani@awattorneys.com>
Subject: Imperial Avalon

*** EXTERNAL SENDER ***

"TYPE & DEFINITION OF VALUE"

File No. 659

Client [REDACTED]
 By Address [REDACTED]
 Carson
 [REDACTED]

County LOS ANGELES

State CA

Zip Code 90745

AS OF 09/20/2019 ALL HOMES IN THE SUBJECT COMMUNITY ARE MARKETABLE ONLY FOR RELOCATION TO ANOTHER COMMUNITY. BASED ON THE DATE OF MANUFACTURE THE APPRAISER ESTIMATED 27 HOMES COULD BE RELOCATED. THE APPRAISER IS NOT A LICENSED CONTRACTOR AND CANNOT QUOTE RELOCATION COSTS. RELOCATION COSTS MUST INCLUDE REMOVAL & RESET UP PLUS REPLACEMENT CARPORTS, PORCHES, PATIOS & SHEDS. THIS LEAVES A MINIMUM OF 282 OWNERS TO BE FULLY COMPENSATED. THE APPRAISER HAS REVIEWED THE APPRAISAL PROVIDED AND FOUND IT SIGNIFICANTLY UNDER VALUED BASED ON A MARKET COMPARISON APPROACH.

AS NOTED IN THE LETTER DATED 3/31/2020 FROM ANDERSON & BRABANT, INC "TYPE & DEFINITION OF VALUE" IS INAPPROPRIATE FOR ADEQUATE COMPENSATION TO THE INDIVIDUAL OWNERS OF ALL HOMES. THE VALUE CHOSEN CLEARLY REPRESENTS THE INTEREST OF OWNERSHIP AND HARMS THE RESIDENTS. "INVESTMENT VALUE" IS NOT APPROPRIATE BECAUSE THE VALUE GIVEN MUST BE WHAT THE RESIDENTS WILL BE PAYING IN ANOTHER COMMUNITY WHICH IS "MARKET VALUE". MARKET VALUE IS WHAT ALL LENDERS REQUIRE WHEN MAKING A LOAN, NOT INVESTMENT VALUE WHICH IS WELL BELOW MARKET VALUE. AS PER THE "STANDARD RENTAL AGREEMENT" SIGNED BY ALL RESIDENTS ITEM 21 "SUBLETTING" FORBIDS THE UNIT OWNER TO SUBLEASE OR RENT THEIR HOME TO A THIRD PARTY. THIS IS A THIRD REASON THAT "INVESTMENT VALUE" IS INAPPROPRIATE. INVESTMENT VALUE DOES NOT TAKE INTO CONSIDERATION QUALITY, CONDITION, UPGRADES AND MANY OTHER DIFFERENCES THAT FULL COMPARISON APPRAISAL DOES TO REACH A REALISTIC MARKET VALUE FOR EACH HOME. THIS APPROACH TO VALUE DOES NOT REQUIRE A ONE SIZE FITS ALL NON MARKET VALUE APPROACH. ANY VALUATION FOR THE INDIVIDUAL HOME OWNERS MUST BE A MARKET VALUE BASED ON A "FULL COMPARISON APPRAISAL REPORT" INCLUDING SALES FROM COMPARABLE SENIOR COMMUNITIES IN THE CITY OF CARSON. THERE ARE SIX SENIOR COMMUNITIES IN CARSON AND 5 ARE NOT COMPARABLE BASE ON SIZE, 32-41 UNITS AND LESSER AMENITIES. THE ONLY SENIOR COMMUNITY THAT HAS AN ADEQUATE AMOUNT OF COMPARABLES BASED ON UNIT AGE, QUALITY AND AMENITIES IN COLONY COVE @ 17700 SOUTH AVALON BLVD AND HAS 450 HOMES.

THE VALUE GIVEN IN THE J.D. POWER SUMMARY IS MORE OF AN AS IS COST APPROACH VERSES A REPLACEMENT COST MARKET APPROACH AND IS SIGNIFICANTLY UNDER VALUED. THE ACCESSORIES NOTED ARE SIGNIFICANTLY UNDER VALUED AND IMPOSSIBLE TO REPLACE AT THE VALUES SHOWN.

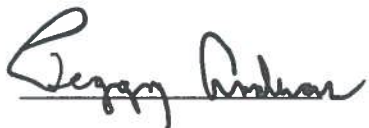
APPRAISAL

June 24, 2020

To Whom It May Concern:

Effective immediately, Peggy and Rudy Anderson, residents of Imperial Avalon, LLC have opted to exercise our right to resign from active participation in the current homeowners association at the park. We are current on our annual dues until April 2021. After careful evaluation and an understanding of all aspects relative to the anticipated closure Imperial Avalon, LLC, we do not wish to support any appeals to the City of Carson on the park's behalf, any lawsuits against the City of Carson or any lawsuits against the park owner, Faring Capital. Likewise, we do not wish to incur any further legal expenses with the Law Offices of Tetro and Lopez. That being said, we have no animosity against the HOA Board or its members, the City of Carson, or Faring Capital. Rather, we would like to keep a dialogue with the current park management, the park owner, and the City of Carson.

Peggy Anderson

A handwritten signature in black ink, appearing to read "Peggy Anderson", written over a horizontal line.

Rudy Anderson

A handwritten signature in black ink, appearing to read "Rudy Anderson", written over a horizontal line.