

Agenda Report

November 22, 2021

TO: Honorable Mayor and City Council

FROM: Planning and Community Development Department

**SUBJECT: APPEAL OF THE BOARD OF ZONING APPEALS' DECISION ON
ZONING ADMINISTRATOR'S DETERMINATION #55
1450 NORTH FAIR OAKS AVENUE**

RECOMMENDATION:

It is recommended that the City Council uphold the Board of Zoning Appeals' decision and uphold the Zoning Administrator's Determination #55 that a Medical Services – Extended Care land use lost its nonconforming status pursuant to PMC Section 17.71.060.B1 (Termination of Nonconforming Use by Discontinuance).

EXECUTIVE SUMMARY:

This appeal is in response to an August 19, 2021 Board of Zoning Appeals decision regarding a Zoning Administrator's determination concluding that a previous nonconforming Medical Services – Extended Care land use (dba 'Golden Cross Health Care', a skilled nursing facility) at 1450 North Fair Oaks Avenue lost its nonconforming status after 12 months of disuse.

The Zoning Administrator's determination on the disuse of the facility was initiated in response to the California Department of Public Health (CDPH) issuing a Temporary Suspension of the license needed by Golden Cross Health Care to operate on June 10, 2020. (Attachment "H"). The suspension was issued as a result of violations that posed an ongoing significant risk to the health and safety of its residents and employees. On June 10, 2020, Golden Cross Health Care was precluded from providing patients with any medical services in their facility and the Medical Services – Extended Care land use was discontinued. On June 11, 2020, CDPH evacuated the facility and residents have not been allowed to return to the facility to this day and the facility has not operated as a skilled nursing facility since then. Subsequently, on May 24, 2021, the Licensing and Certification Program of CDPH issued the License Revocation and Withdrawal of Temporary Suspension Order and terminated Golden Cross Health Care's license to operate the facility as a skilled nursing facility.

Pursuant to PMC Section 17.71.060.B1, without any further action by the City, a nonconforming use shall lose its nonconforming status and shall not be reestablished if the nonconforming use is discontinued for any reason for a continuous period of at least 12 months. Based on the information provided by the State, and on the fact that no other permits or licenses were issued to operate the facility at the site prior to the June 10, 2021 date, the Zoning Administrator made a determination on June 16, 2021 that the nonconforming Medical Services – Extended Care use was discontinued for a continuous period of at least 12 months. Therefore, the nonconforming use lost its nonconforming status and shall not be reestablished.

On June 28, 2021, the property representative filed an appeal application with the Board of Zoning Appeals, of the Zoning Administrator's Determination. (Attachment "F").

On August 19, 2021, the Board of Zoning Appeals considered, at a scheduled hearing, the appeal of Zoning Administrator's Determination #55. Staff's recommendation to the Board of Zoning Appeals was to uphold the Zoning Administrator's Determination #55. At the conclusion of the public hearing, and after public testimony, the Board of Zoning Appeals upheld the Zoning Administrator's Determination #55. (Attachment "B"). The motion resulted in a 4-0 vote by the four members present.

On August 26, 2021, the representative of the property filed an appeal application with the City Council, of the Board of Zoning Appeals decision. (Attachment "A"). The hearing before the City Council is a *de novo* hearing where the Council has no obligation to honor the prior decisions and has the authority to make an entirely different decision.

Based on the previous analysis, staff recommends that the City Council uphold the Board of Zoning Appeals August 19, 2021 decision and uphold the Zoning Administrator's Determination #55.

BACKGROUND:

What is before the City Council is the appeal of a decision made by the Board of Zoning Appeals regarding a Zoning Administrator's determination that a Medical Services – Extended Care use, located at 1450 North Fair Oaks Avenue, lost its nonconforming status as a result of the use being discontinued for a continuous period of at least 12 months.

Adjacent Uses:

North – Medical Services – Extended Care
South – Multi-Family Residential
East – Multi-Family Residential
West – Funeral Home and Religious Facility

Adjacent Zoning:

- North – FGSP-RM-16 (Fair Oaks – Orange Grove Specific Plan, Multi-Family Residential, 16 dwelling units per lot)
- South – FGSP-RM-16 (Fair Oaks – Orange Grove Specific Plan, Multi-Family Residential, 16 dwelling units per lot)
- East – RM-12 (Multi-Family Residential, two dwelling units per lot)
- West – FGSP-RM-16 (Fair Oaks – Orange Grove Specific Plan, Multi-Family Residential, 16 dwelling units per lot)

Previous Cases on the Site:

Variance #4146: Approved on February 11, 1954. The Variance was a request to construct a 25-bed surgical hospital. Approval supersedes Variance #3935.

Variance #3935: Approved on July 2, 1953. The Variance was a request to construct a 25-bed surgical hospital and to use an existing residence as part of the hospital facility. In addition, the Variance included a request for an eight-foot tall block wall.

Nonconforming Use History

The subject Zoning Administrator's Determination (Attachment "G") originally identified the nonconforming land use as Residential Care, General, but subsequent to the appeal of the Zoning Administrator's Determination, and after additional research, it was determined that the previous use of the facility operated as a skilled nursing facility and is classified as a Medical Services – Extended Care land use. Both uses are not permitted in the FGSP-RM-16 zoning district, are nonconforming land uses and are subject to the same time limits associated with nonconforming uses. As a result, the determination made by the Zoning Administrator on June 16, 2021 that a nonconforming land use lost its nonconforming status after 12 months of disuse, applies to the Medical Services – Extended Care land use.

In 1954, Variance No. 4146 was approved to allow the establishment of a 25-bed surgical hospital at this site, which was not a permitted use at the time, and required approval of a land use Variance to operate. The facility, and related on-site improvements, were built in 1965. At some point the use of the facility transitioned from a surgical hospital into a convalescent home with 96 beds providing skilled nursing facility services. The term convalescent home is synonymous with skilled nursing facilities and the City of Pasadena classifies a skilled nursing facility as a Medical Services – Extended Care land use. The subject property is zoned FGSP-RM-16 and per Zoning Code Section 17.33.040, Table 3-14 (Allowed Uses and Permit Requirements for Fair Oaks/Orange Grove RM-16 district) the zoning district does not permit Medical Services – Extended Care as a land use. As a result, the skilled nursing facility, operated by Golden Cross Health Care, was operating as a legal, nonconforming Medical Services – Extended Care land use until having its license suspended on June 10, 2020.

As detailed further in the Inspector General's Interim Report, on May 4, 2020 (Attachment "I"), a California Department of Public Health Healthcare-Associated Infections Program (HAI) nurse conducted an on-site assessment of the facility and determined that the facility had not fully complied with the recommendations given to the facility during previous trainings and documented noncompliance with cohorting and other COVID-19 infection prevention and control protocols. Then, "[o]n May 15, 2020 the [Los Angeles County Department of Public Health, Health Facilities Inspection Division (HFID)] identified [six] deficiencies [related to COVID-19 procedures] that posed "immediate jeopardy" to residents' health and safety. Immediate jeopardy is defined as a situation in which a resident has suffered or is likely to suffer serious injury, harm, impairment or death as a result of a facility's noncompliance with one or more health and safety requirements."

After continued failed attempts to remedy the complaints, on June 10, 2020, a Temporary Suspension Order of the facility's license was issued by CDPH in response to the ongoing risk to the health and safety of residents. (Attachment "H") According to the report, "by the time the decision was made to evacuate the facility, 71 residents and 32 staff had contracted COVID-19 and 16 residents had died". On June 11, 2020, all the residents were evacuated from Golden Cross Health Care (Golden Cross) and lacking a state license to legally house and treat residents, it has not operated as a skilled nursing facility since then. Subsequently, on May 24, 2021, the Licensing and Certification Program of CDPH permanently revoked Golden Cross Health Care's license to operate the facility because they had not complied with the statutory obligation to renew the license. (Attachment "E").

The operational deficiencies of Golden Cross Health Care that posed an "immediate jeopardy" to the residents' health and safety, and which led to its evacuation and license suspension, as well as the suspension and the evacuation, are well documented as a matter of public record. They were the subject of analysis and reporting by The Los Angeles County Office of the Inspector General, in the report entitled, "Improving Oversight and Accountability Within Skilled Nursing Facilities: Second Interim Report, February 2021, pages 6-12. (Attachment "I"). See, also, "Pasadena nursing home evacuated after failing to provide basic medical services, city says," Pasadena Star News, June 12, 2020, (Attachment "J") and "Inside the 'anarchy' of Pasadena's evacuated nursing home," Pasadena Star News, June 18, 2020 (Attachment "K"); "Residents evacuated from Pasadena skilled nursing facility after state suspends license," Los Angeles Times, June 13, 2020 (Attachment "L"); "Dozens of Patients Removed from Pasadena Nursing Home," US News, June 12, 2020 (Attachment "M").

Given the severity of the conditions and the suspension of the license, the City of Pasadena was following the status of the facility with CDPH. Knowing that the facility had its license to operate suspended in June 2020, in June 2021, the Zoning Administrator reviewed whether the facility had been able to resume activity, and determined that the use had not resumed. In addition, on May 24, 2021, the Licensing and Certification Program of CDPH permanently revoked Golden Cross Health Care's license to operate the facility as a SNF because they had not complied with the statutory obligation to renew the license. Therefore, on June 16, 2021, the Zoning

Administrator issued a determination that the nonconforming Medical Services – Extended Care land use lost its nonconforming status due to disuse of the facility for a period of at least 12 months. This decision was appealed by the appellant on June 28, 2021 (Attachment “F”) on the basis that the use had not been discontinued for more than 12 months.

Overconcentration of Skilled Nursing Facilities (SNF)

The City of Pasadena's General Plan identifies ten “Community Places”. The subject facility is located within the Northwest “Community Place” and due to an overconcentration of institutional uses in the Northwest, General Plan Land Use Element Goal 40, Policy 40.2 prohibits a number of new institutional uses (including Medical Services – Extended Care) from locating anywhere within the boundaries of the Northwest “Community Place.”

“Policy 40.2: Institutional Uses Overconcentration:

Prohibit new development of but allow for the improvement of: Single-Room Occupancy, Adult Day Care, General, Medical Services – Extended Care (i.e., Convalescent Facilities), Detention Facilities, Hospitals, Maintenance and Service Facilities, Residential Care, General, or a use classification that includes a use listed here with another use.”

In addition, data indicates that there is an overconcentration of skilled nursing facility (SNF) beds within the City. The CA Department of Public Health, Healthcare Facility Licensing and Certification Program licenses and regulates SNFs in CA and has a database that includes the number of licensed SNF beds at each facility in the state. The number of licensed SNF beds in the City of Pasadena per 100,000 residents is 2.3 times the number in Los Angeles County as a whole. The general occupancy rate of licensed SNF beds in Pasadena, as of July 28, 2021, was only 72 percent, indicating that many licensed beds were unoccupied. As the subject facility was not licensed, the 96 unoccupied beds at Golden Cross Health Care were not included in this calculation, and if included, the vacancy rate would increase. This is generally representative of SNF-bed occupancy in Pasadena. As a result, even without the inclusion of the beds previously at Golden Cross, there is a surplus of available SNF beds and no immediate demand for additional SNF beds in Pasadena. Hence, the discontinuation of this specific use will not have a negative impact on health care or available health care.

Board of Zoning Appeal's Public Hearing

On June 28, 2021, the property representative filed an appeal with the Board of Zoning Appeals, of the Zoning Administrator's Determination (Attachment “F”) citing a disagreement with the decision of the Zoning Administrator. The appellant asserted that the use of the property did not cease on June 10, 2020, and in fact, has never ceased and was still active today. The appellant supported this assertion by stating that the beds are still at the facility, the medical records are still available at the facility and the office functions of the facility are still proceeding. In addition, in the appeal, the appellant stated that while the facility “does not have any patients...[t]he Facility continues to be

maintained in a condition to receive patients.” The appellant contested that the use as a Medical Services – Extended Care facility has continued even though no patients reside on-site.

On August 19, 2021, the Board of Zoning Appeals considered at a scheduled public hearing, an appeal of the Zoning Administrator's Determination #55 that a Medical Services – Extended Care land use lost its nonconforming status pursuant to PMC Section 17.71.060.B1. A written response to the appellant's claims was provided to the Board of Zoning Appeals as a component of the August 19, 2021, Board of Zoning Appeals staff report. (Attachment “D”). Staff presented the report and recommended that the Board of Zoning Appeals uphold the Zoning Administrator's determination.

During the Board of Zoning Appeals hearing, the appellant and their representative provided a presentation in opposition to the Zoning Administrator's Determination stating that the City erred in issuing the determination. In addition, the appellant submitted a letter to the Board of Zoning Appeals (Attachment “C”), as additional support to their presentation, stating that:

- (1) The Zoning Administrator Determination did not comply with the legal standard for abandonment of nonconforming rights, as delineated by California courts;
- (2) That the City has not offered the required evidence to support loss of nonconforming property rights under the Zoning Code;
- (3) That the suspension of use was involuntary and temporary and should be allowed to continue as a matter of equity and fairness; and,
- (4) That the property's land use is not dictated by the CDPH license.

At the conclusion of the public hearing, after considering written and verbal public testimony, and with full knowledge of the property and vicinity, the Board of Zoning Appeals made a motion to uphold the Zoning Administrator's Determination that the Medical Services – Extended Care land use at 1450 North Fair Oaks Avenue lost its nonconforming status due to disuse. (Attachment “B”). The motion resulted in a 4-0 vote by the four members present.

APPEAL OF BOARD OF ZONING APPEALS DECISION:

On August 26, 2021, the representative of the property submitted an appeal application (Attachment “A”) to the City Council. The hearing before the City Council is a *de novo* hearing where the City Council has no obligation to honor the prior decisions and has the authority to make an entirely different decision.

As part of their appeal, the appellant submitted an amended version of the letter submitted to the Board of Zoning Appeals as part of their presentation, with the same statements on how the City erred in issuing the determination except for the exclusion

of the fourth assertion that the property's land use is not dictated by the CDPH license. The following are the appellant's assertions:

- (1) The Zoning Administrator Determination did not comply with the legal standard for abandonment of nonconforming rights, as delineated by California courts;
- (2) The City has not offered the required evidence to support loss of nonconforming property rights under the Zoning Code; and,
- (3) The suspension of use was involuntary and temporary and should be allowed to continue as a matter of equity and fairness;

ANALYSIS:

Land Use Definitions: Medical Services – Extended Care

The Zoning Code classifies Golden Cross Health Care as a “Medical Services – Extended Care” use, which is defined as a land use that is:

“[a]n establishment providing care on a 24-hour basis for persons requiring regular medical attention, but excluding facilities providing surgical or emergency medical services.” (Emphasis added)

Golden Cross Health Care previously provided 24-hour skilled nursing services and provided medical attention to patients, thus fulfilling the criteria of the land use. The integral component that classifies the use of the facility as a Medical Services – Extended Care is the provision of medical attention to persons on a 24-hour basis.

Status of the Nonconforming Use

The subject site is located in the FGSP-RM-16 zoning district. As indicated in PMC Section 17.33.040, Table 3-14 (Allowed Uses and Permit Requirements for the Fair Oaks/Orange Grove Specific Plan RM-16 district), a Medical Services – Extended Care use is not a permitted use in this zoning district. Therefore, Golden Cross Health Care's previous use of the site as a Medical Services – Extended Care use was nonconforming.

Pasadena Zoning Code Chapter 17.71 is entitled “Nonconforming Uses, Structures and Lots” and Section 17.71.060 is entitled “Abatement and Termination” where subsection “B” therein is entitled “Termination of nonconforming uses by discontinuance.” Section 17.71.060.B(1)(3) and (4) of the Zoning Code states:

- “(1) Without any further action by the City, a nonconforming use shall lose its nonconforming status and shall not be reestablished if the nonconforming use is discontinued for any reason for a continuous period of at least 12 months.

(3) The determination of discontinuance (aka abandonment) shall be supported by evidence, satisfactory to the Zoning Administrator (e.g. the actual removal of equipment, furniture, machinery, structures, or other components of the nonconforming use and not replaced, the turning off of the previously connected utilities, or where there are no business receipts/records or any necessary licenses available to provide evidence that the use is in continual operation).

(4) In an appeal of the Zoning Administrator's determination that the use has lost its nonconforming status by discontinuance, the appellant shall be required to present evidence satisfactory to the Zoning Administrator showing that the use is in continual operation.”

The nonconforming use was discontinued on June 10, 2020 due to the temporary suspension of Golden Cross Health Care's license to operate by the California Department of Public Health. In addition, on June 11, 2020, all residents were evacuated based on advice from the California Attorney General's Office.

Based upon CDPH protocol, Golden Cross was unable to provide residents with medical services when their license was suspended on June 10, 2020. It is at this point that the discontinuance of use commenced. On May 24, 2021, the Licensing and Certification Program of CDPH permanently revoked Golden Cross Health Care's license to operate the facility because they had not complied with the statutory obligation to renew the license. In addition, staff confirmed with CDPH, and other agencies, that new licenses to operate the facility as a Medical Services – Extended Care use were not issued for the subject site prior to June 10, 2021, twelve months after the suspension, nor have residents/patients been allowed back into the facility.

Based on this information, the Zoning Administrator made a determination that the nonconforming Medical Services – Extended Care use was discontinued for a continuous period of at least 12 months and on June 10, 2021, twelve months following the license suspension, the nonconforming use lost its nonconforming status and could not be able to reestablish. As of the writing of this report, the appellant has not presented satisfactory evidence that the use was in continual operation; refer to appeal discussion (next page).

The timeline, next page, identifies a sequence of events that occurred since the State suspended Golden Cross Health Care's license. The 12-month period began on June 10, 2020, when the license was suspended by CDPH and ended on June 10, 2021, in addition, the timeline identifies the sequence of events after the Zoning Administrator issued the determination on June 16, 2021.

Period of 12 months	<ul style="list-style-type: none"> o June 10, 2020: Golden Cross Health Care license to operate a skilled nursing facility suspended by CDPH. <u>Commencement of discontinuance.</u> o June 11, 2020: All staff and residents of the facility were evacuated from the facility. o May 24, 2021: Golden Cross Health Care's license to operate a SNF at 1450 N. Fair Oaks Avenue permanently revoked by the Licensing and Certification Program of CDPH. o June 10, 2021: Nonconforming use discontinued for a continuous period of 12 months. o June 16, 2021: Zoning Administrator issued determination that the nonconforming use lost its nonconforming status due to disuse.
Post 12 months	<ul style="list-style-type: none"> o June 28, 2021: Property representative appealed the Zoning Administrator's Determination. o August 19, 2021: Board of Zoning Appeals hearing of the appeal of the Zoning Administrator's Determination; Zoning Administrator's Determination upheld. o August 26, 2021: Property representative appealed the Board of Zoning Appeal's decision to uphold the Zoning Administrator's determination.

Responses to the Appeal:

As stated in the staff report presented to the Board of Zoning Appeals (Attachment "D"), in order to maintain a nonconforming use, the use itself has to continue at the subject address—as described in the land use definition in the Zoning Code. This would have required the facility to have "provided care on a 24-hour basis for persons requiring regular medical attention", which is not possible when there are no persons residing on the property to receive such services due to the suspension of the license and the evacuation of the residents. Simply maintaining beds and medical records or an office function of the previous use does not continue the use as a Medical Services – Extended Care use.

Furthermore, Zoning Code Section 17.71.060.B states that:

"[t]he determination of discontinuance (aka abandonment) shall be supported by evidence, satisfactory to the Zoning Administrator (e.g. the actual removal of equipment, furniture, machinery, structures, or other components of the nonconforming use and not replaced, the turning off of the previously connected utilities, or where there are no business receipts/records or any necessary licenses available to provide evidence that the use is in continual operation)." (Emphasis added.)

As the license required to operate the facility was suspended on June 10, 2020, and not reissued prior to June 10, 2021, and the residents necessary to continue the

nonconforming use were evacuated on June 11, 2020, the two critical pieces required to operate as a SNF were not present, whether voluntarily or involuntarily, and the facility has not had the means in which to operate. Whether the use was discontinued voluntarily or involuntarily is not a part of the Zoning Administrator's purview in determining whether the nonconforming use continued. As a result, the Zoning Administrator received sufficient evidence per the Zoning Code's requirements that the facility was not in continual operation as of June 10, 2020 based on the license suspension and evacuation of the residents.

Further, the arguments made by appellant's legal counsel is not on point. The case relied on regarding continuous use, Hansen Brothers Enterprises, Inc. v. Board of Supervisors (1996) 12 Cal.4th 533, involved a rock quarry, where there was *continuous use of part of the property for the purpose for which it was permitted*. The facts here are inapposite, as no part of the property was used to care on a "24-hour basis for persons requiring regular medical attention". (See also Stokes v. Board of Permit Appeals (1997) 52 Cal.App.4th 1348, 1355-1356.)

More importantly, appellant's argument regarding "voluntary" abandonment is misplaced. Discontinuance of a use when required by law or a public health order (in this case, the Temporary Suspension Order by CDPH) does start the clock running on "nonuse," regardless of whether that discontinuance was "voluntary" or not. (*Id.* at p. 1356.) The Stokes court held that, when a use is required to be discontinued by lawful order, there is no vested right to restart the use of the property as lawful, nonconforming use when the time to do so has run.

"Stokes further argues the discontinuance must be voluntary. He claims since the prior owners closed the bathhouse under direct order from the City, or at least the imminent threat of such an order, the discontinuance was not voluntary and the nonuse cannot defeat the right to continue a nonconforming use. There was no evidence as to the reason for the closing. But assuming it was closed as a public health hazard, Stokes has cited no authority for the proposition that there can be no finding of "nonuse" when the business was closed under lawful order.

Stokes properly states the prevailing rule that "reuse may be prohibited when a nonconforming use is voluntarily abandoned." (Hill, *supra*, 6 Cal.3d at p. 286, 98 Cal.Rptr. 785, 491 P.2d 369, fn. omitted.) However, to adopt his argument that an exception exists when the discontinuance is required by law, would turn the doctrine of nonconforming use on its head. That the City may abate a particular use as a menace to the public health or as a public nuisance is beyond dispute. (Sunset Amusement Co. v. Board of Police Commissioners (1972) 7 Cal.3d 64, 71–72, 101 Cal.Rptr. 768, 496 P.2d 840.) As stated in Hill, " 'A nonconforming use is a *lawful* use existing on the effective date of the zoning restriction and continuing since that time in nonconformance to the ordinance.' " (Hill, *supra*, 6 Cal.3d at p. 285, 98 Cal.Rptr. 785, 491 P.2d 369, italics added for emphasis.) The Planning Code likewise defines nonconforming use as "a use which existed *lawfully* at the effective date of this Code, or of amendments thereto, ..." (§ 180, subd. (a)(1), italics added for emphasis.) In

this regard, the Hill court noted that a reasonable nonconforming use cannot also create a public nuisance. (6 Cal.3d at p. 285, 98 Cal.Rptr. 785, 491 P.2d 369.)” (Id. at p. 1356.)

As of the writing of this report, the appellant has not presented any evidence to support the assertions that the actual use was in continual operation. Furthermore, such use would not be legal as the necessary licenses for patient care have been suspended and are not in place. As a result, the Zoning Administrator correctly determined that the use as a Medical Services – Extended Care use ceased when the facility's license was suspended and the residents were vacated from the property.

CONCLUSION:

It is staff's assessment after considering the appeal, and the Board of Zoning Appeals determination, that the Zoning Administrator's Determination was correctly made. The nonconforming use was discontinued on June 10, 2020, when the license required to provide patients with medical services was suspended. The license required to operate a skilled nursing facility at the facility was revoked on May 24, 2021. Staff confirmed that a license was not reinstated or a new license to operate the facility as a Medical Services – Extended Care use was not issued for the subject site prior to June 10, 2021 and thus the discontinuance of use continued for at least 12 months. Therefore, it is recommended that the City Council uphold the Board of Zoning Appeal's decision to uphold the Zoning Administrator's Determination #55 that the nonconforming Medical Services – Extended Care land use lost its nonconforming status and shall not be reestablished.

FISCAL IMPACT:


There is no fiscal impact as a result of this action and will not have any indirect or support cost requirements.

Respectfully submitted,



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Approved by:



STEVE MERMELL
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Attachments:

- Attachment A – Appeal of the Board of Zoning Appeals decision dated August 26, 2021
- Attachment B – Board of Zoning Appeals' Decision Letter dated August 24, 2021
- Attachment C – Applicant's Correspondence to the Board of Zoning Appeals dated August 18, 2021
- Attachment D – Board of Zoning Appeals Staff Report (without Attachments) dated August 19, 2021
- Attachment E – License Revocation and Withdrawal of Temporary Suspension Order dated August 3, 2021
- Attachment F – Appeal of the Zoning Administrator's Determination, dated June 28, 2021
- Attachment G – Zoning Administrator Determination, dated June 16, 2021
- Attachment H – Notice of Temporary Suspension from CDPH, dated June 10, 2020
- Attachment I – Inspector General's Interim Report, dated February 2021

- Attachment J – Pasadena Star News article, dated June 12, 2020
- Attachment K – Pasadena Star News article, dated June 18, 2020
- Attachment L – Los Angeles Times article, dated June 13, 2020
- Attachment M – US News article, dated June 12, 2020