

McMillan, Acquanette (Netta)

From: Richard McDonald
Sent: Saturday, March 1, 2025 11:52 AM
To: Jomsky, Mark
Cc: PublicComment-AutoResponse
Subject: RE: Emailing: Appellants' Letter to CC dtd 02.10.2025 (Agenda Item #7)
Attachments: Maxwell House event information-combined (1).pdf

[⚠] CAUTION: This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe. Report phish using the Phish Alert Button. For more information about the Phish Alert Button view article "KB0011474" on the DoIT portal.

Mark - Please provide the Mayor and City Council members with the attached submittal from the Appellants for Agenda Item #5 on Monday's Agenda. Please also let me know if it will be first on the Agenda after the SBA presentation as stated on February 10, and the order for the proceedings on it. Thank you. Have a good weekend.

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101

Telephone: (626) 356-4801
Cell: (626) 487-6713
E-mail: RMcDonald@stonercarlson.com

Website:
<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.carlsonnicholas.com%2F&data=05%7C02%7Cnmcmillan%40cityofpasadena.net%7C3c7b85ecfd964bda38bf08dd58fa99e6%7C82d9fc002c664402a28fc6bcd32e491%7C1%7C0%7C638764556221374692%7CUnknown%7CTWfPbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOilwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoiTWFpbiIsIldUljoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=6WYMJ0V5Y68GwUAFrNNeyxTx87BgkuF7Kf3CB%2FZaTL0%3D&reserved=0>

-----Original Message-----

From: Richard McDonald
Sent: Monday, February 10, 2025 11:43 AM
To: mjomsky@cityofpasadena.net
Cc: correspondence@cityofpasadena.net
Subject: FW: Emailing: Appellants' Letter to CC dtd 02.10.2025 (Agenda Item #7)

Mark - Attached are Appellant's Letters to the City for tonight's hearing on their appeal, which is Agenda Item #7. Please provide it to all City Council members so that they can review them before the meeting. Please also contact me should you have any questions. Thank you.

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101

3/3/2025
Item 5

Telephone: (626) 356-4801
Cell: (626) 487-6713
E-mail: RMcDonald@stonercarlson.com

Website:

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.carlsonnicholas.com%2F&data=05%7C02%7Cnmcmillan%40cityofpasadena.net%7C3c7b85ecfd964bda38bf08dd58fa99e6%7C82d9fc002c664402a28fc6bcd32e491%7C1%7C0%7C638764556221397566%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiwlJ2UuMDAwMCIsIlAiOiJXaW4zMilslkFOljoitWFBpbCIsIldUljoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=MGs%2FKbwVjlpImINgNsDvX4RNNs6vOcwDGsUPXy14Tg%3D&reserved=0>

-----Original Message-----

From: Richard McDonald <rmcdonald@stonercarlson.com>
Sent: Monday, February 10, 2025 11:36 AM
To: Richard McDonald <rmcdonald@stonercarlson.com>
Subject: Emailing: Appelants' Letter to CC dtd 02.10.2025

Your message is ready to be sent with the following file or link attachments:

Appelants' Letter to CC dtd 02.10.2025

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

The Maxwell House

RECEIVED

2025 FEB 31 AM 8:06

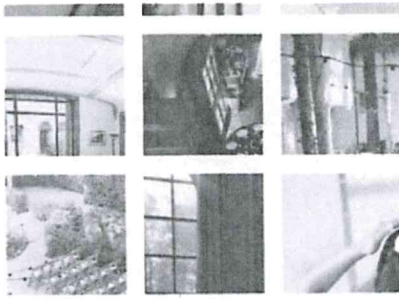
CITY CLERK
CITY OF PASADENA

weekend wedding package
(rehearsal • ceremony
• reception)
starting at \$9,000



Our Wedding package is designed for those looking to uphold classic traditions as well as those looking to create their own unique memories. This package includes use of the venue for rehearsal, ceremony, and reception. Also included in your rental are tables, chairs, plenty of parking in a designated parking lot, setup/breakdown of venue furniture, and other complimentary features! Best of all, your entire rental fee goes towards supporting the programs of our nonprofit organization, the Western Justice

The Maxwell House



programs that empower people to strengthen their communities by growing the conflict resolution skills and capacity of youth, educators, schools, and community partners.

There are no discounts for partial use.

package details...

Saturday or Sunday rental only (no weekday weddings)

Saturday weddings have access to the venue from 9:00am to 11:00pm with music off at 10:00pm. This time includes setup and breakdown.

Sunday weddings have access to the venue from 10:00am to 10:00pm with music off at 9:00pm. This time includes setup and breakdown.

Weddings may use the rental time for ceremonies, receptions, or both. No changes in pricing can be made. Our rates apply regardless of usage, season, or date.

The Maxwell House

mezzanine, kitchen, limited use of large garden patio for your ceremony, and 2 wedding suites!

Setup & breakdown of furniture owned by The Maxwell House, according to your floor plan needs.

Security Personnel

Rental pickups may take place Monday morning following your event (a budget-friendly option!)

Access to nearby designated parking lot

Dance floor - Required for all events where dancing will take place. (Our dance floor is located in a private room adjacent to the dining area and cannot be moved.)

100 wood folding chairs with ivory seat cushion

100 gold wood chiavari ballroom chairs with plush ivory cushions

12x round event tables (60", seats 8-10/ea)

The Maxwell House

2x rectangular event tables (8',
seats 8-10/ca)

5x round high top cocktail tables
(30")

Artisan Crafted Wood Wedding
Arch

Antique Wood Bar

Cake Table - 36" round

Indoor A/C & Heat

PA System with Wireless
Microphone

WiFi access

Trash bins & bags

Post-event table/chair tear down
owned by venue

not included and
may be required...

REQUIRED: Event insurance -
Coverage proof from WedSafe or

The Maxwell House

1-million in general liability
alcohol. We do not receive any
money for this, just proof of
coverage. Clients report this cost to
be between \$150-\$200 for a 1-day
plan.

REQUIRED: Event
Coordinator Planner from our
preferred vendor list - A minimum
of a professional Day-of
Coordinator" is required for all
events with more than 30 people.
Our couples typically pay between
\$1,800 and \$3,000 depending on
the services they secure.

REQUIRED: Professional
Bartending Services from Maxwell
House preferred vendor list if
alcohol will be provided for guests.
Please see our list of Partnered
Bartending Service Providers.

REQUIRED: DJ Emcee from our
preferred vendor list - We have a
fabulous array to choose from! Our
couples typically pay between
\$1,800 and \$3,000 depending on
the services they secure.

The Maxwell House

Silverware dishware cookware of
any kind

Catering services - BYO with
insurance and business license

Any other amenities or services not
listed above

Subscribe to our mailing list to receive updates and hear about upcoming
events.

Email Address

+

[Contact](#) [Venue Rules](#) [Tour](#) [Donate](#) [Tenant Maintenance Requests](#)



Maxwell House | 55 South Grand Ave. Pasadena, CA 91105

(626) 356-8014 | MaxwellHousePasadena@gmail.com



The Maxwell House

meeting room rentals

monday-thursday 9am-5pm

Individual rooms or the entire first floor can be rented for meetings,
trainings, seminars, etc.

Rentals must take place M-Th between 9am-5pm.

hourly rates

Library \$90 hr 6-10
people

Dining Room \$150 hr 10
- 20 people

Living Room \$200 hr up
to 100 people

Garden Patio \$250 hr up
to 100 people

Meeting Room Rentals Include...

Access to nearby parking lot with
no fee – free public street parking
available

Setup & breakdown of furniture
owned by The Maxwell House,
according to your floor plan needs

Tables and chairs

The Maxwell House

people

(4 hr minimum)

day rates (9am-5pm)

Library \$600 day (6-10

people)

Dining Room \$1000 day

(10 - 20 people)

Living Room \$1,400 day

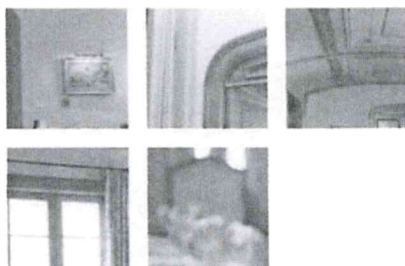
(up to 100 people)

Garden Patio \$1,750 day

(up to 100 people)

Entire 1st Floor & Garden

Patios \$3500 8hr day



Projector and Screen

PA Sound System with Wireless
Microphone

WiFi access

Trash bins & bags

not included...

Linens - BYO

Silverware dishware cookware of
any kind

Catering services - BYO

Any other amenities or services not
listed above

Subscribe to our mailing list to receive updates and hear about upcoming
events.

The Maxwell House

non-profit rentals
monday-thursday 9am-5pm

501 C 3 Non-profit organizations and community groups may rent individual rooms, the garden patios, or the entire first floor for meetings, trainings, seminars, programs, etc. Rentals must take place M-Th between 9am-5pm.



The Maxwell House

5 pm)

Library \$45 hr

Dining Room \$75 hr

Living Room \$100 hr

Garden Patio \$125 hr

Entire 1st Floor \$275 hr

4 hour minimum

day rates
(8 hrs)

Library \$300 day

Dining Room \$500 day

Living Room \$700 day

Garden Patio \$875 day

Entire 1st Floor \$1750 day

rentals
include...

Setup & breakdown of
furniture owned by The
Maxwell House, according to
your floor plan needs

Tables and chairs

Indoor A C & Heat

Projector and Projector
Screen

PA Sound System with
Wireless Microphone

WiFi access

Trash bins & bags

not included...

REQUIRED *(for special
events only)*: Event insurance
- Coverage proof from
WedSafe or any accredited
insurance agency that can
meet the requirements of 1-

The Maxwell House

any money for this, just proof of coverage. Clients report this cost to be between \$100-\$200 for a 1-day plan.

REQUIRED (*for special events only*): Event Coordinator/Planner - A minimum of a Day-of Coordinator is required for all events with more than 30 people. Please note, this person cannot be one of your party guests, but rather a paid professional.

REQUIRED (*for special events only*): Professional Bartending Services from Maxwell House preferred vendors. Please see our list of Partnered Bartending Service Providers.

Linens

Silverware/dishware/cookware of any kind

Catering services - BYO

The Maxwell House

filming & production

an historic home with a
hollywood history

The perfect location for intimate to grand productions.
Convenient with vaulted ceilings, large rooms, small rooms, outdoor
patios, restrooms, load-in ramp, storage, parking, full kitchen, and
convenient location.

rates

Rates can be adjusted or
negotiated to fit each specific
budget.

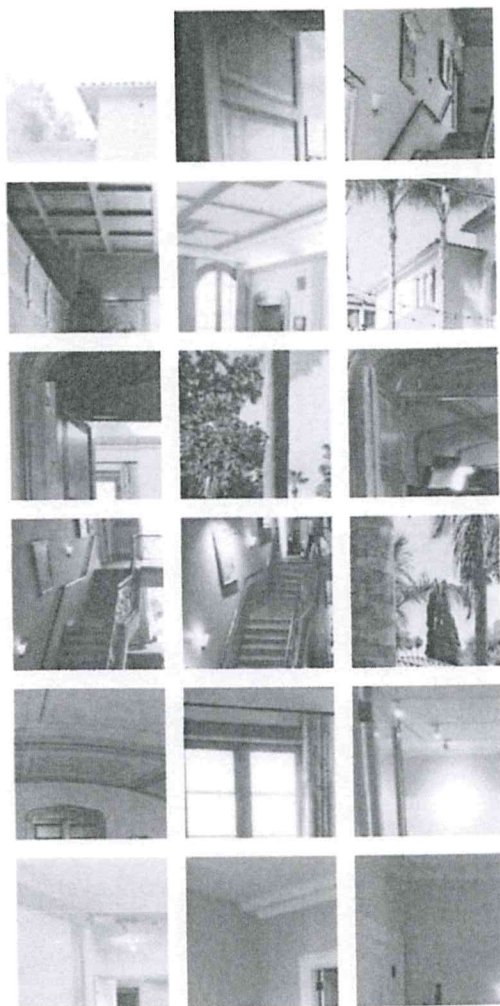
Please inquire with our Events
Coordinator for availability.

Film Rentals Include...

Spacious rooms with high,
vaulted, ceilings

Access to indoor & outdoor
restrooms

The Maxwell House



room

Fully ADA compliant
entrance w/ ramp

120 wood folding chairs with
ivory seat cushion

12x round event tables (60",
seats 8-10 ea)

8x rectangular event tables
6', seats 6-8 ea)

2x rectangular event tables
8', seats 8-10 ea)

5x round high top cocktail
tables 30")

Garden patio string lighting

Indoor A/C & Heat

WiFi access

Trash bins & bags

Setup & breakdown of
furniture owned by The
Maxwell House, according to
your floor plan needs

The Maxwell House

Day-of Insurance- *Required*

- Coverage proof from any
accredited insurance agency
that can meet the
requirements of 1-million in
general liability. We do not
receive any money for this,
just proof of coverage.

Catering services - BYO

Any other amenities or
services not listed above

as seen on...

HBO

KTLA

PBS

5

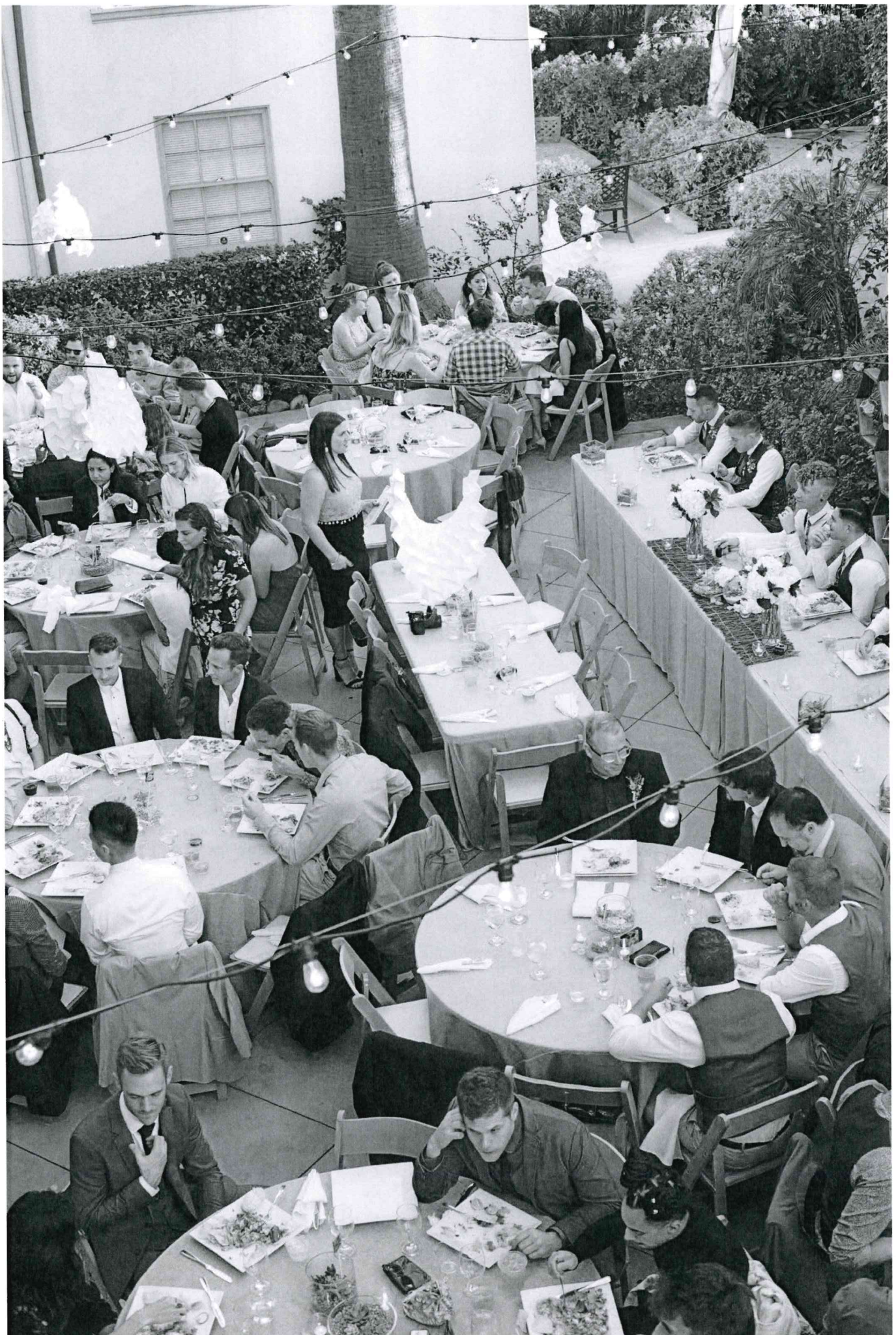


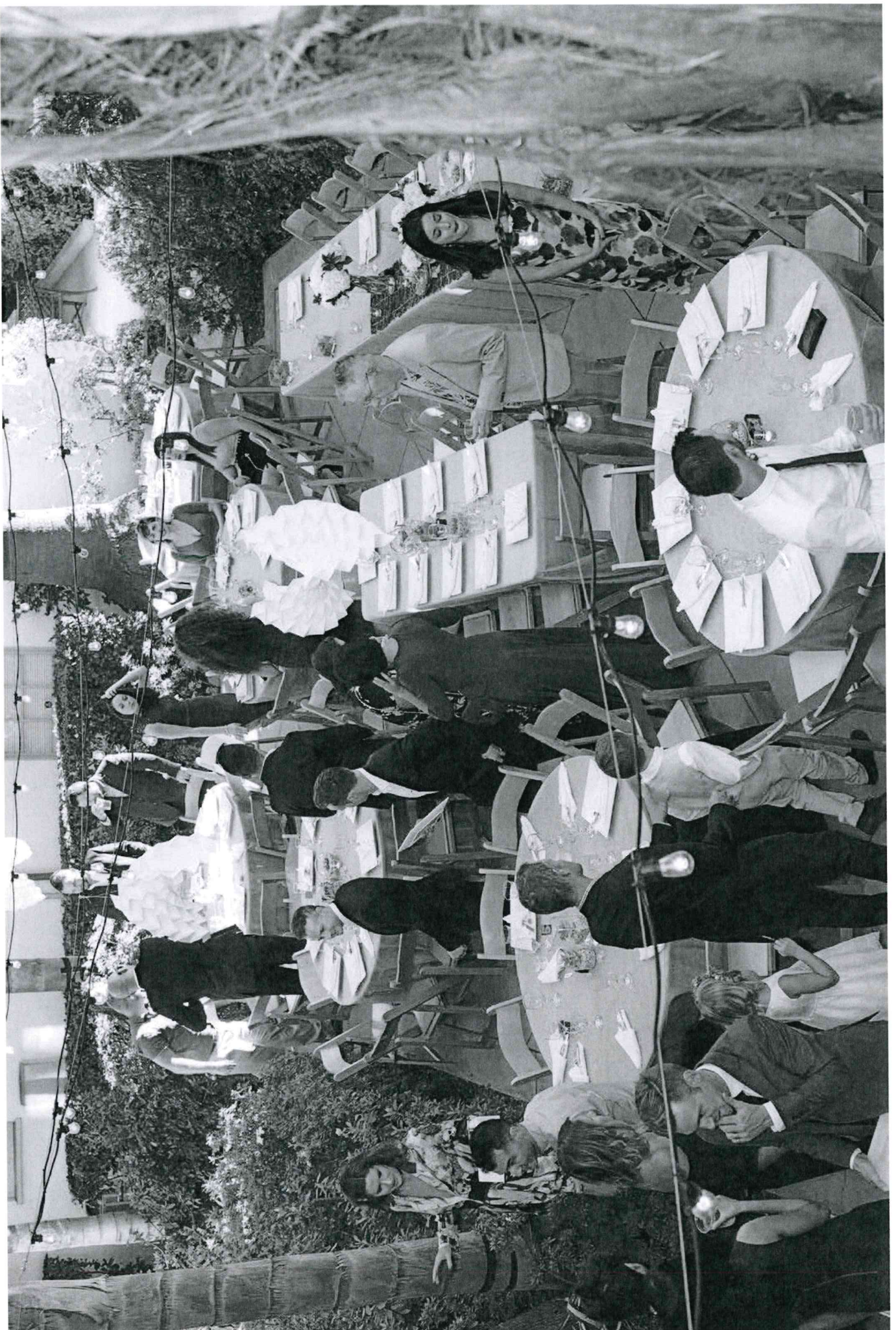








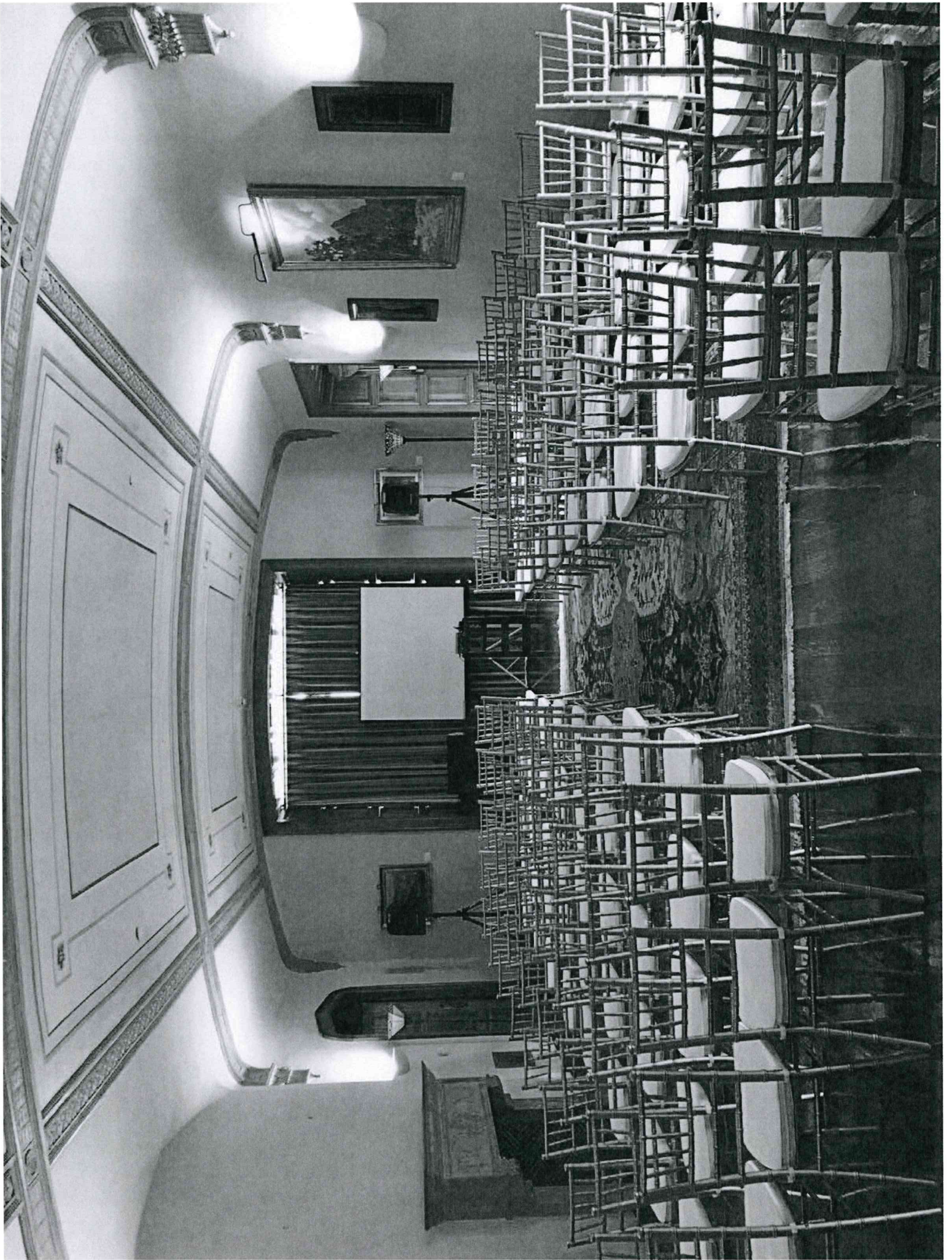




































Campus

**A HOME FOR
NONPROFITS
(/NONPROFIT-CAMPUS)**

**THE MAXWELL HOUSE
(/THE-MAXWELL-
HOUSE)**

**EATON FIRE
RESOURCES (/EATON-
FIRE-RESOURCES)**



The Western Justice Center's secondary mission is to support nonprofits that serve Pasadena and surrounding communities by providing them with office space on our Campus, which is located near Historic Old Town Pasadena (<https://www.visitpasadena.com/things-to-do/old-pasadena-neighborhood-guide/>). Click on the links below to learn more about the nonprofits that call our Campus home.

Asian Pacific American Dispute Resolution Center

(<https://apadrc.org/>)

California Art Club (<https://www.californiaartclub.org/>)

Community Women Vital Voices

(<https://www.communitywomenvv.com/>)

Create CA (<https://createca.org/>)

GRACE (<https://grace-inc.org/>)

Innovative Space for Asian American Christianity

(<https://www.isaacweb.org/>)

Jericho Road (<https://jrpasadena.org/>)

Laurel Foundation (<https://laurel-foundation.org/>)

Leadership Pasadena (<https://www.leadershippasadena.org/>)

League of Women Voters Pasadena Area

(<https://my.lwv.org/california/pasadena>)

MobilityDog (<https://mobilitydog.org/>)

Mount Wilson Institute (<https://www.mtwilson.edu/>)

Pasadena Audubon Society

(<https://www.pasadenaudubon.org/>)

RECEIVED

2025 FEB 31 AM 8:08

CITY CLERK
CITY OF PASADENA

WJC is unique in that we have two main sets of programs. One advances our primary mission. The other provides space for non-profits that make the WJC Campus their home. That Campus consists of four historic buildings located at 55, 65, 75, and 85 S. Grand Avenue in Pasadena, adjacent to the U.S. Court of Appeals for the Ninth Circuit. Our tenants occupy Buildings 65, 75, and 85. WJC occupies Building 55, known locally as The Maxwell House and used regularly as an event rental venue.

To ensure that WJC is able to sustain our Campus, we will:

- Fill all vacancies and move tenants into multi-year leases with annual rent increases. Raise and set aside funds needed to address deferred repairs. And, form a board task force to explore alternative leasing options that would allow WJC to maintain the Campus more efficiently. Implement the most feasible option.
- Sustain the reputation of the Maxwell House as a premiere small wedding rental venue. Invest in necessary upgrades. Leverage relationships with local vendors. Expand weekday rentals to include corporate gatherings and film/TV shoots. Add donor recognition elements for the endowment campaign.
- Upgrade WJC HQ office space to facilitate collaborative teamwork and accommodate volunteers. Transform under-utilized meeting space into the Neutral Ground Learning Lab, a state-of-the-art, multi-functional, creative space for WJC participating schools and community partners. Make repairs needed to weatherize and improve the building's energy efficiency.



SPONSORSHIP
(/EMPOWER-
SPONSORSHIP)
HONOREES
(/HONOREES)
PHOTO ALBUM
(/PHOTO-ALBUM)
VIDEOS (/VIDEOS)
TRIBUTE JOURNAL
(/TRIBUTE-JOURNAL)

SPONSORSHIP OPPORTUNITIES

THURSDAY, SEPTEMBER 26, 2024 | JONATHAN CLUB, 545 S FIGUEROA STREET, LOS ANGELES, CA 90071
TO BE INCLUDED IN PRINT INVITATION, PLEASE SUBMIT SPONSORSHIP COMMITMENT BY JULY 20

PRESENTING SPONSOR (\$50,000) ^A

- Co-branding with WJC on event slides
- Two tables for 12 guests, premier seating
- Special thank you from the event podium
- Logo on Step & Repeat, event website, print invite, and event signage
- Two-page Presenting Sponsor ad in event e-tribute journal
- Sponsorship recognition at WJC's 2025 Peer Mediation Invitational**
- Double Room Deluxe Suite at the Jonathan Club the night of event
- LA groundspace logo on event (1-4 guests)
- Weekday event at The Maxwell House, valued at \$5,000*
- Exclusive branding opportunity (choose one of the following):
Logo on cocktail napkins, at valet, or branded photo booth

EMERALD SPONSOR (\$35,000)

- One table for 12 guests, premier seating
- Special thank you from the event podium
- Logo on Step & Repeat, event website, and event signage
- Name listed on printed invitation
- Full-page Emerald ad in event e-tribute journal
- Sponsorship recognition at WJC's 2025 Peer Mediation Invitational**
- Deluxe Suite at the Jonathan Club the night of the event
- Exclusive branding opportunity (choose one of the following):
Logo on cocktail napkins, at valet, or branded photo booth

STUDENT AMBASSADOR SPONSOR (\$7,500)

- Branded table at Empower
- Seating for 10 students/superheroes
- Logo on event website and event signage
- Name listed on printed invitation
- Full-page ad in event e-tribute journal
(limited tables available)

*THE MAXWELL HOUSE

WJC's The Maxwell House is a historic event space located in the heart of Downtown Old Town Pasadena. Full of unique historic charm, it is a popular venue for weddings, corporate events, and gatherings, and can accommodate up to 100 guests.

**PEER MEDIATION INVITATIONAL

PHI is an annual youth peacebuilding summit hosted at The California Endowment that brings together students, educators, and community partners to learn, network, be inspired, and plug into the larger movement for safer, more inclusive schools. PHI is also attended by professionals from companies and law firms who provide coaching for student mediators.

SPONSOR

DIAMOND SPONSOR (\$25,000)

- One table for 12 guests, premier seating
- Special thank you from the event podium
- Logo on event website and event signage
- Name listed on printed invitation
- Full-page Diamond ad in event e-tribute journal

PLATINUM SPONSOR (\$15,000)

- One table for 10 guests, premier seating
- Logo on event website and event signage
- Name listed on printed invitation
- Full-page Platinum ad in event e-tribute journal

GOLD SPONSOR (\$10,000)

- Seating for 8 guests
- Logo on event website and event signage
- Name listed on printed invitation
- Full-page Gold ad in event e-tribute journal

SILVER SPONSOR (\$5,000)

- Seating for 4 guests
- Logo on event website and event signage
- Name listed on printed invitation
- Half-page Silver ad in event e-tribute journal

BRONZE SPONSOR (\$2,500)

- Seating for 2 guests
- Logo on event website and event signage
- Name listed on printed invitation
- Quarter-page Bronze ad in event e-tribute journal

SPONSORSHIP OPPORTUNITIES
(/S/WJC-EMPOWER_2024_SPONSORSHIP_MENUHTPS://SECURE.QGIV.COM/FOR/WESTERNJUSTICE
INITIAL-MENUUPDF-5HZE.PDF)

BUY A SPONSORSHIP

Interested in Sponsoring Empower 2024? Please contact our team
(mailto:SLOERA@WESTERNJUSTICE.ORG?subject=Empower%20Sponsorship&body=%0A).

2024 EMPOWER SPONSORS

PRESENTING

LA EDUCATION

RECEIVED

STONER CARLSON LLP
Attorneys at Law

2025 MAR -3 AM 11:36

CITY CLERK
CITY OF PASADENA

Scott W. Carlson, Partner
Richard A. McDonald, Of Counsel

www.carlsonnicholas.com

301 E. Colorado Blvd.
Suite No. 320
Pasadena, California 91101
(626) 356-4801

Scott@stonercarlson.com
RMcDonald@stonercarlson.com

March 3, 2025

VIA E-MAIL

Mayor Victor M. Gordo
Vice-Mayor Jess Rivas,
Honorable Councilmembers Cole, Hampton, Jones, Lyon, Madison, and Masuda
c/o City Clerk
City of Pasadena
100 N. Garfield Avenue, 2d Floor
Pasadena, CA 91101

Re: Agenda Item #5: 55-85 S. Grand Avenue – Western Justice Center CUP #7114

Dear Mayor Gordo, Vice-Mayor Rivas, and Honorable Councilmembers:

This letter is submitted on behalf of Anita Yagjian and her neighbors on South Grand Avenue (collectively, “Appellants”) who oppose the issuance of Conditional Use Permit No. 7114 (“CUP #7114”) to the Western Justice Center (“WJC”) and the commercialization of their neighborhood.

As you will recall, on February 10, the City Council voted to continue this matter so that the City could investigate and explore additional funding options for the WJC in hopes of lowering the number of potential “life cycle events” it wanted to hold. Whether as a lease amendment or otherwise, as Councilmember Madison explained, he thought it would be simpler for the parties to reach an agreement on a lower number of events and begin to mend their relationship if the City stepped up to the plate like it does for so many other non-profits.

Contrary to the City Council’s vote and instructions, however, staff did no such thing. Instead, they asked the parties to meet in hopes of reaching an agreement, which then might be the basis for the City to consider its options. A true and correct copy of staff’s February 19, 2025 email explaining that it would not do as instructed and Appellant’s reply is attached hereto as Exhibit “A” and incorporated herein by this reference.

3/3/2025
Item 5

Although the WJC was fine with staff's approach, Appellant's objected and continued to request WJC's financial data and what the City could do as the City Council instructed. WJC did not provide anything. It would not even explain how it calculated the \$300,000 stated in its February 10 letter to the City Council.

The parties then met on February 28 with an attorney mediator from the City Attorney's office who made it explicitly clear that he had been told by the City Attorney and "others on high" that the lease agreement was not at issue and that the mediation was only to see if the parties could reach an agreement on the conditions of approval attached to the BZA decision letter.

Although Appellants appeared in good faith to try and resolve what they could, the February 28 mediation was a waste of time. Appellants were asked to negotiate against themselves, the WJC refused to agree to any long-term solutions and offered nothing but narcissistic drama that was delusional, to say the least. As a result, nothing was resolved.

On March 1, therefore, we provided you with several photographs from the WJC websites that show it has completely and totally commercialized the use of the Maxwell House. Whether it be renting meeting rooms on a daily basis, wedding events, filming or otherwise, the WJC pays one dollar a month for the facility and then rents it out seven days a week for a profit.

Regardless of how it spends that profit, it is generating a profit in violation of its Lease, the terms under which the City purchased the property from the federal government, CUP#2423, and the Zoning Code. Indeed, CUP #2423 was granted under section 17.26.030 of the Zoning Code, which provides for administrative, business, professional, government, medical and research and development office uses. Nowhere does it provide for office rentals.

Further, the photographs show how the outdoor weddings directly impact the neighbors, whose wall is adjacent to the outdoor patio, and how the WJC's current list of tenants and its 2024 Strategic Plan have nothing to do with its original purpose.

Specifically, as stated before, according to the City's July 20, 1993 Agenda regarding the second amendment to the Lease, the Pasadena Surplus Property Authority acquired title to the Maxwell House property from the GSA on September 17, 1989 "for the expressed purpose of leasing it to the Western Justice Center." See Exhibit "C" to Appellant's February 10, 2025 Letter. The City's Executive Director stated that the WJC would "provide an institutional center of national repute for study and research in the areas of law reform, improvements to judicial administration and lawyer competency, law-related education and service to the community with respect to improvement in legal processes and the use of alternative processes to litigation." *Id.* In short, the GSA sold the property to the Pasadena Surplus Property Authority so that it could lease it to the WJC for law-related public functions.

As further noted in the March 31, 1989 staff report to the City Council, the use of the property is "restricted to the purposes described in the Plan of Public Purpose for Surplus

Property,” which requires the WJC to be operated for “non-profit law-related functions.” See Exhibit “D” at 3 to Appellant’s February 10, 2025 Letter. According to the City’s Lease with WJC, WJC is bound by the Plan of Public Use for Surplus Property (“Plan of Public Use”) that dedicated the property to the public purposes of the City, namely, to assist in the City’s goal to “provide increased and improved legal services to the citizens of Pasadena” and to “provide a forum for educational research.” See Exhibit “F,” Section 5.1 to Appellant’s February 10, 2025 Letter.

The language in the Lease is consistent with the City Manager’s statements and the parties’ intent to prohibit for profit activities on the Premises. Specifically, Section 1.2 states:

This Lease is not entered into as a commercial transaction by either party, but Landlord wants to ensure that its goals are met, *that the operations of Tenant do not constitute a nuisance or otherwise disturb the neighborhood*, and that the Premises are properly maintained and protected.

Id. (emphasis added). Similarly, Section 5.1 expressly states:

The Premises shall be used and occupied by Tenant and its sublessees *only for the purposes described in the Plan of Public Use for Surplus Property*, including but not limited to the following non-profit law related functions, ... and for no other purposes whatsoever. *Tenant is expressly prohibited from* leasing the Premises or any portion thereof to lawyers offering legal services for profit *or allowing the Premises or any portion thereof to be used for any for profit activities*.

Id. (emphasis added). Neither the City nor the WJC ever negotiated or contemplated the use of the historic Maxwell House as a for-profit venue that was rented out seven days a week.

To the contrary, the Lease and City records are direct evidence that the Maxwell House may not be used for profit and that their daily rentals evidenced by the documents produced from its website show it to be violating the Lease, CUP #2423, all TUPs issued by the City, and now threatening even more violations. Despite that fact, until the recent car accident, the City had no idea what was going on and did nothing to enforce the code or law.

In addition, the WJC's current list of tenants shown in the photographs, its commercialization of the WJC campus, the described use of it in their 2024 Strategic Plan and the expanded use of it in the CUP application before you are significantly and materially different from that stated in the Plan of Public Use for Surplus Property.

Under the Plan of Public Use which the City agreed to, the WJC campus must be used to encourage research and development in judicial administration and education, used by visiting scholars who engage in research, run pilot projects and test methods of dispute resolution, and serve as the home of the Community Dispute Resolution Center to provide alternatives to the use of our over-burdened court system to mediate, among other things, disputes between landlords

and tenants. The WJC campus is not currently in compliance with any of these use restrictions and its application for CUP #7114 is simply another violation of it. The City has a legal obligation and duty to enforce the terms of its Lease and its Code to put WJC in compliance. That it has failed to do so has and will continue to endanger the neighbors who are being directly impacted by WJC's repeated violations.

Last, as explained in our February 10, 2025 letter, the Maxwell House is located within the PS-1 (Public and Semi-Public) zoning district. Under Zoning Code Section 17.26.030, "[c]lubs, lodges, private meeting halls" are listed as a "C(2)" land use, meaning it requires a CUP in accordance with Footnote 2, which states they are "[l]imited to accessory *facilities* of a principal use." Zoning Code § 17.26.030 (emphasis added).

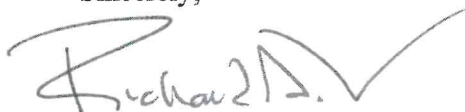
The photographs from its website prove that the renting of the historic Maxwell House for weddings and other life cycle events *as advertised on its website* is not using it "primarily for use by members or guests." Just the opposite. It is opening it up to the public at large as a commercial venue for profit. In fact, the February 10, 2025 staff report states on pages 4 and 8 that the proposed use as a wedding venue "would be accessory to the primary administrative offices use," without telling you that the administrative offices are rented out on a daily basis for profit in violation of CUP #2423.

Worse, although we fully explained how "accessory facilities" are different from "accessory uses", staff insists they are interchangeable. They are not. Simply look up the definitions of lie-care facility, off-street loading facility, parking facility, public safety facility, recycling facility, religious facility, residential care facility, telecommunications facility, transportation dispatch facility, and other land-uses defined in the Zoning Code with the word "facility". Every one of them draws a clear distinction between the physical facility and the use(s) within it, which directly and expressly disproves staff's sophistry.

The proposed use, the current for-profit activities of the WJC, and the current tenants are not permitted under the Lease, the Zoning Code, the Plan for Public Use required and agreed upon to acquire the site, or any prior zoning entitlement. Appellants, therefore, are simply asking WJC and the City to live up to the deal they made with the Federal Government when they acquired the property so that the neighborhood is no longer detrimentally impacted as has been demonstrated.

Thank you for your consideration and attention.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard A. McDonald", with a large checkmark at the end.

Richard A. McDonald, Esq.
Law Office of Richard A. McDonald,
Of Counsel, Stoner Carlson LLP

EXHIBIT A

Richard McDonald

From: Richard McDonald
Sent: Monday, March 3, 2025 6:58 AM
To: Richard McDonald
Subject: FW: WJC Appeal

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101

Telephone: (626) 356-4801
Cell: (626) 487-6713
E-mail: RMcDonald@stonercarlson.com

Website: www.carlsonnicholas.com

From: Richard McDonald <rmcdonald@stonercarlson.com>
Sent: Tuesday, February 18, 2025 6:05 PM
To: Paige, Jennifer <jpaige@cityofpasadena.net>
Subject: RE: WJC Appeal

Jennifer – No offense, but I think that is the opposite of what CC Madison stated. I also think it would be very hard to agree on a reduced number of events without knowing the economic assistance being provided, i.e., a little or a lot. Relieving utility payments, building maintenance and other costs done for other non-profits in the city would be very different than some other forms of assistance. Happy to discuss it if need be. Thank you.

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101

Telephone: (626) 356-4801
Cell: (626) 487-6713
E-mail: RMcDonald@stonercarlson.com

Website: www.carlsonnicholas.com

From: Paige, Jennifer <jpaige@cityofpasadena.net>
Sent: Tuesday, February 18, 2025 5:26 PM
To: Richard McDonald <rmcdonald@stonercarlson.com>
Subject: RE: WJC Appeal

Hi Richard,

This conversation is just the two parties to see if you can agree on anything related to the CUP. If for example the number of events is reduced to an agreed upon number then separately the lease will be looked at by economic development.

Thanks
Jennifer

From: Richard McDonald <rmcdonald@stonercarlson.com>
Sent: Tuesday, February 18, 2025 2:34 PM
To: Paige, Jennifer <jpaige@cityofpasadena.net>
Subject: RE: WJC Appeal

[!] **CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you *know* the content is safe. Report phish using the Phish Alert Button. For more information about the Phish Alert Button view article "KB0011474" on the DoIT portal.

Jennifer – I forgot to ask, but is the City participating? What it is willing to do monetarily seems to me to be the key to breaking any impasses or compromises as CC Madison suggested, which is why I ask.

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101

Telephone: (626) 356-4801
Cell: (626) 487-6713
E-mail: RMcdonald@stonercarlson.com

Website: www.carlsonnicholas.com

From: Paige, Jennifer <jpaige@cityofpasadena.net>
Sent: Tuesday, February 18, 2025 11:13 AM
To: Richard McDonald <rmcdonald@stonercarlson.com>
Subject: RE: WJC Appeal

Thank you Richard

From: Richard McDonald <rmcdonald@stonercarlson.com>
Sent: Tuesday, February 18, 2025 11:10 AM
To: Paige, Jennifer <jpaige@cityofpasadena.net>
Subject: RE: WJC Appeal

[!] **CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you *know* the content is safe. Report phish using the Phish Alert Button. For more information about the Phish Alert Button view article "KB0011474" on the DoIT portal.

Thank you. We can be available March 3 if you need a bit more time.

Richard A. McDonald, Esq.
Stoner Carlson LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101