

McMillan, Acquanette (Netta)

From: cityclerk
Sent: Monday, April 6, 2026 8:28 AM
To: Iraheta, Alba; Jomsky, Mark; Robles, Sandra; Sabha, Tamer; McMillan, Acquanette (Netta); Soo, Christine
Subject: FW: April 6 Council Meeting Public Comment - Agenda Item #5
Attachments: S2 Final Response to Opposition 2.11.26.pdf

From: Adam Bray-Ali
Sent: Monday, April 6, 2026 8:26:24 AM (UTC-08:00) Pacific Time (US & Canada)
To: City_Council <ccouncil@cityofpasadena.net>; cityclerk <cityclerk@cityofpasadena.net>
Subject: April 6 Council Meeting Public Comment - Agenda Item #5

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Good afternoon City Council and Mayor,

Summary - The Rental Housing Board and its newly formed Rental Stabilization Department created an insecure database that includes the names, addresses and tenancy details of every rental property in the city. Placing many at risk of being subject to their personal details being revealed by Federal agents and others that may not respect our Constitution.

As you review and learn more about the many challenges with the impact of how the Federal Government is accessing and potentially abusing Pasadena City records I want to share a unique and potentially unknown database in Pasadena that will soon contain the names of every residential renter in the city.

The Rental Stabilization Department, which operates outside Pasadena's traditional management structure, is creating a database that includes the name of every Pasadena tenant resident, accessible by federal agencies. This places names, addresses and residency details into the public domain in ways that endanger people. Those worried about domestic violence, stalkers and federal agents acting outside of constitutional boundaries are all at great risk right now for now legitimate reason as a result of the choices by the Director of the Rental Stabilization Department.

Background:

Last October, rental property owners were required by the Rent Stabilization Department (RSD) to upload copies of all rent increase notices to a database used as a rental registry. Noting privacy concerns and the obvious additional workload involved, this was raised to the Rental Housing Board who were unaware that the RSD was doing this. At the October meeting just before the deadline to register all properties, the RHB as a whole appeared surprised to learn of this demand.

At the time, the RSD director, Helen Morales, claimed this was a mistake, that there was an option to not upload these documents and that property owners were instructed to redact, or cover up the names of the tenants on these notices. No such direction was given before that date (the registration deadline was

October 31, 2025). Shortly afterwards, she changed the story and claimed that although there were no prior instructions about redacting names, that could be done now. Then her story essentially became "you technically gave us the authority to do this and we are going to no matter what you want to say" to the Rental Housing Board.

In later meetings of the Rental Housing Board, issues of protecting the names of tenants from being absorbed into this registry have been raised for multiple reasons and a Pasadena landlord and anonymous resident fearing that their name would lead to actions by ICE filed a lawsuit against the city related to this.

Unfortunately, the Pasadena City Attorney's Office defended this over-reach by the RSD staff and now the RSD director has presented a new set of logic to the Rental Housing Board in their past 2 meetings claiming they gave her the authority to demand copies of every rental notice for all rental property in Pasadena. I was in the courtroom where Deputy City Attorneys made a showy handover of 'documents' that were claimed to be the information collected by the RSD but were, in fact, a stack of random printouts and junk papers. A callous and cruel maneuver made me realize that for all the city's claims to protect local residents, the actual on the ground experience is that the city's power is being used to demand ever greater amounts of data and then leave it vulnerable to outside access.

The rental housing board seems puzzled by all of the technicality but we learned that the RSD director and staff expect to manually process this data annually and use it to find discrepancies of rent increases above allowed amounts. The claim is that collecting the names is incidental.

If you wish to be on the side of privacy and protect Pasadena's law-abiding residents, you need to give direction to this unaccountable and unelected Rental Housing Board and their department director that doesn't report to the City Manager or your Council. This evening you also have an opportunity to appoint a new At-Large member of their tilted board. Please use this as an opportunity to bring someone with some actual property management experience into the conversation.

With sincere hope that this doesn't prove as bad as feared,

Adam Bray-Ali

For more details, please see court Case No.: 25PDPC00069-01
and Rental Housing Board Agenda item #1 from the April 2, 2026 meeting.

--
Adam Bray-Ali

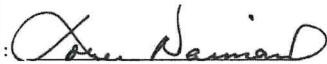
1 PLEASE TAKE NOTICE that on February 11, 2026, in Department Northeast C, at
2 8:30 a.m. or as soon thereafter as the matter may be heard, the Petitioners will present
3 the following response to the People’s Opposition to the Petitioner’s motion to
4 suppress evidence and return property.
5

6
7 This Response is made on the grounds that the City of Pasadena improperly seized
8 retains, and now after a continuing request to return certain documents, has failed to
9 do so. In addition, Respondents, specifically aver that:

- 10 • (1). An improper seizure occurred under color of authority.
- 11 • (2) There is a substantial difference between requesting and receiving information and
12 the physical taking of tangible property and/or invasions into *a person's reasonable*
13 *expectation of privacy*.
- 14 • (3) Petitioner possesses standing to bring this motion.
- 15 • (4) Petitioner has not received the requested documents.
- 16 • (5) Petitioner is not collaterally estopped from bringing this action.
- 17 • (6) The court has jurisdiction to hear such an action prior to the filing of a criminal
18 action.

19 The Response is supported by the following Memorandum of Points and Authorities,
20 Declaration, attachments, exhibits, stipulations and testimony of live witnesses.
21

22 Dated: *February 8, 2026*

23
24 
25 *Loren Naiman*
26 State Bar No. 82491
27 Attorney for Petitioners
28 Robert Simpson and John/Jane Doe.

MEMORANDUM OF POINTS AND AUTHORITIES

1 I. INTRODUCTION AND STATEMENT OF FACTS

2 a. In Rem Evidentiary Documents Requested for Return.

3 On December 16, 2025, property which had been delivered to and accepted by Petitioners counsel,
4 for use as evidence, was taken, by force, from the Attorney's hands. Previously, these, and many
5 other documents had been informally requested, then formally requested in a motion to compel, and
6 ultimately more formally requested through the service of subpoenas.
7

8 Prior to the hearing, Counsel for the Petitioner had contacted the City Attorney to ensure that
9 requested, evidence would be available at the time of the hearing. The subject documents were
10 handed to Petitioners' counsel prior to the hearing. The Petitioner and Counsel had full control of
11 the documents and were able to scan through them, sufficient to observe that requested "Notices of
12 the Petitioner's Rent Increases" were not brought to the courtroom. In other words, evidence had
13 not been submitted.
14

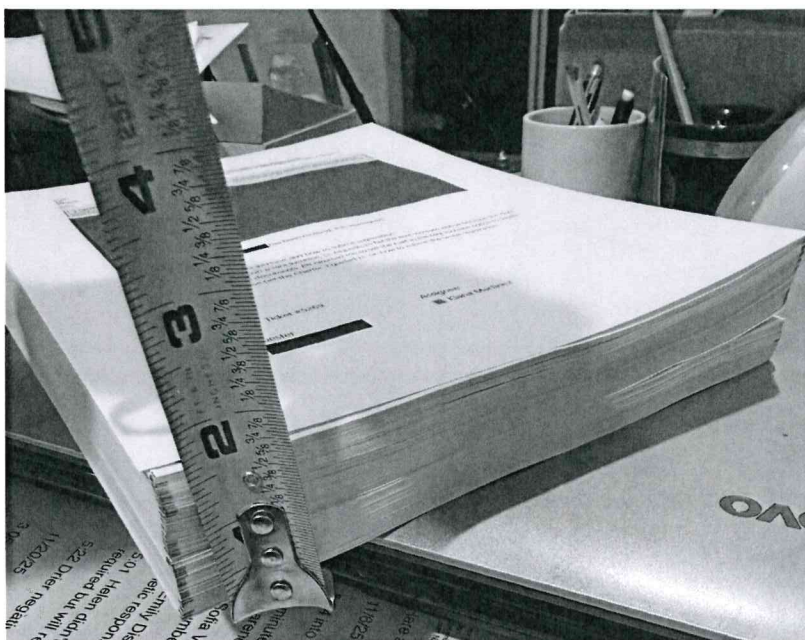
15 At the time the documents were provided, Counsel for the City was asked if the documents were
16 being given to Petitioners pursuant to subpoena or pursuant to the City's provision of documents,
17 pursuant to CPRA. Counsel for the City stated that they were provided pursuant to the CPRA.¹
18

19 The documents are best described as being color copies of records, retained by the city. The
20 documents were 8.5 by 11, bound at the top center with a heavy metal, folding clasp. The clasp was
21 necessary because there were more than 350 pages in the tranche of documents. The stack of
22 documents was approximately 2 inches thick and weighed between two and three pounds.
23

24 (demonstrative Exhibit 1 is found below, attached hereto and incorporated herein by reference.)²
25
26

27 ¹ In a letter from Dion O'connell, Assistant City Attorney, Petitioners counsel had been advised that that documents
28 would be provided on or **before** December 22. Petitioner's counsel had advised the City Attorney that the documents
were necessary for the hearing and that failure to provide could be a due process violation.

² THE ORIGINAL DOCUMENTS REMAIN IN THE POSSESSION OF THE CITY OF PASADENA.



(The documents depicted above are not the actual documents. The actual documents remain in the hands of the City.)

At the time the documents were taken, Counsel for the Petitioners was standing. The documents were being held with two hands, palms up and pages in the stack were held open by the attorney's thumbs.

Counsel for the Petitioner had advised the City Attorney that documents belonging to the Petitioner, (over 165 pages of 8.5X11 paper. See Exhibit 2)³ which would have demonstrated the breadth of the physical taking of documents, rather than just information, were not in the discovery materials.

At that time Counsel for the Petitioner advised the City Attorney that there were many additional, potential registrants who desired the return of their documents and the suppression of the document's potential use as evidence, by the City or any other governmental agency.

³ One Hundred and sixty-five pages of redacted copies of the Petitioner's Notices were provided eight days after the Court Hearing. Even after the late transmission of documents, the records received, did not contain all of the Notices that had been uploaded.

1 At that time, the City Attorney grabbed at the documents. Counsel was holding them tightly due to
2 their weight. The attempted taking came as a complete surprise.

3
4 When she was unsuccessful in dislodging the documents on the first attempt, the City Attorney
5 grabbed them again and forcefully ripped them from the hands of Petitioner's Attorney. The City
6 Attorney then left the court with the documents she had previously provided to the Petitioner.

7 Before she left, witnesses were able to see that the top sheets of the document had been ripped due
8 the force of the taking. The damage to the packet was clearly noticeable.

9
10 The actual documents provided are essential possessions of the Petitioner. Only the original copies
11 can demonstrate what was and what was not provided. Evidence of that fact is necessary to explain
12 the event and to conduct future conversations with City Officials. Submission of untorn, digital
13 copies do not provide evidence of the forceful seizure. Without the originals, there is no way to
14 prove that the digital copies provided the same as the copies provided in court. The document that
15 was taken is clearly marked by the tears of its front pages.

16
17 Requests for the preservation and return of the documents have fallen on deaf ears. New written
18 requests were submitted to the City Attorney, Assistant City Attorney and to the City Manager. No
19 response was provided.

20
21 When by December 21, 2025, the city had not even complied with their agreed to date for CPRA
22 compliance, Counsel for the Petitioner went to the Office of the City Attorney to inquire. Counsel
23 met with the Assistant City Attorney Dion O'connell and specifically inquired to retrieve the
24 previously requested documents including the torn originals. O'connell said they could only Provide
25 digital copies.

26
27 A new request has now been provided to the City Attorney requesting a photo of the torn documents.
28 It is not expected that the Respondent will provide a photo.

1 I. INTRODUCTION AND STATEMENT OF FACTS

2 b. Rationale behind Petitioner's request to suppress evidence and return property

3 On November 17, 2025, Petitioner Robert Simpson filed a motion for the return of property, and
4 suppression of evidence, pursuant to Penal Code Section 1538.5 and through a special proceeding
5 pursuant to cases in the line of *Ensoniq Corp. v. Superior Court (1988) 65 CA 4th 1537, 1547; and*
6 *Buker v. Superior Court (1972) 25 CA 3d 1085, 1089.*

7
8 Petitioner's motion was made to retrieve tangible, physical business records seized from him and
9 ordered uploaded from his personal computer systems by agents of the city of Pasadena. The
10 records were yearly "Notices of Rent Increase" required under state law to legally provide cost of
11 living increases to current tenants. While these documents must be presented to tenants, there is no
12 current California or Local ordinance which requires production of these documents for the City of
13 Pasadena. (See Pasadena Rental Housing Board Agenda item of the Director of the Pasadena Rent
14 Stabilization Department, Helen Morales.)

15
16 An example of one of these notices, obtained on December 24, 2025 from the City of Pasadena is
17 herein provided as shown in Exhibit 2.
18

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NOTICE OF CHANGE IN TERMS OF TENANCY

DATE: April 1, 2025.


_____ and all other _____ TENANT IN POSSESSION

ADDRESS: 420 _____ N. Los Robles Ave.,
Pasadena, CA, 91101.

The terms of tenancy under which you occupy the above listed dwelling unit are hereby changed, and your rent is hereby increased \$47.00 monthly, from \$1,579.00 to \$1,626.00 monthly effective 5/1/2025 payable in advance.

Dated this 31 day of April, 2025
In the city of Pasadena, county of Los Angeles, state of California.

Date of delivery: 4/3/25
Time of delivery: 5:30 PM
Delivered to: _____
Delivered by: _____


(Owner)


Robert B. Simpson, P.O. Box 1301, South Pasadena, CA 91031, Off / Fax 626-441-2091

1 Under the coercion that he could not operate his rental business, and would suffer civil and criminal
2 fines and potential jail, Petitioner was forced to scan more than a hundred of these documents and
3 upload them to the City’s Rental Registry.

4
5 Pursuant to City Regulations, Petitioner entered required information into the Pasadena Rental
6 Registry. This included the address and rental amount of each unit in properties he rents.

7 However, the uploaded notices also provided images of his signature, the name and signature of an
8 employee, and the name of his tenants and current residence address of each of his tenants. None of
9 that information is required or authorized by the statute. Nor did the city intend to obtain the
10 information. (See admission of Hellen Morales Exhibit 3.)

11
12 Included in the scanned documents, are documents providing the name, current address and
13 signature of John/Jane Doe, an undocumented resident. (Exhibit 4. Which will be filed under
14 seal.). The same information relating to other undocumented parties is also at issue.

15
16 John/Jane Doe lives under the constant threat of deportation and lives in fear that documents
17 currently in the hands of the City of Pasadena compromise her existence in the country she now calls
18 her home.

19 It is likely that other tenants, have similar concerns about compromising contact information taken
20 by the city through its coercive processes.

21
22
23 **c. Operational Facts Regarding Measure H and Seizure Precursors**

24
25 According to the City of Pasadena’s “Measure H” website⁴, on November 22, 2022, residents of the
26 City of Pasadena passed a rent control and tenant protection initiative that amended the city charter.

27
28 _____
⁴ <https://www.cityofpasadena.net/rent-stabilization/measure-h/>

1 The legislation was Codified as City Charter Article XVIII. It is known as the Fair & Equitable
2 Housing Charter Amendment. (*City of Pasadena Charter, art. XVIII, § 1800 et sec*) That
3 amendment established the Pasadena Rental Housing Board. (*City of Pasadena Charter, art.*
4 *XVIII, § 6*).

6 One of the stated obligations of the Pasadena Rental Board is to investigate Landlords. This
7 is especially true when it comes to financial information. The Article clearly states in
8 pertinent part, that one of its Powers and Duties is to Conduct investigations, audits and
9 hearings. (Art. §1811(e) (13). The board and its agents also have the ability to subpoena
10 documents, but that was not done in this case.

13 In further pursuit of Housing Board obligations, the City created a Rent Stabilization Department
14 which undertook the duty of creating and implementing a Rental Registry data base and user portal.
15 (<https://www.cityofpasadena.net/rent-stabilization/services-responsibilities/>). On June 7, 2024, the
16 City announced the appointment of HELEN MORALES, the Director of the Rent Stabilization
17 Department. One of her duties to create and implement the Pasadena Rent Registry.⁵

19 A computer company, 3Di, was chosen by the Rental Board and the Rent Stabilization Department
20 as the implementing agency for the Registry. (Statements of Helen Morales at the November 6,
21 2025 meeting of the Pasadena Rental Housing Board.) Measure H, provided that specific, and
22 limited, items of information be uploaded either electronically, or manually into an electronic data
23 storage system.

27 ⁵ <https://www.cityofpasadena.net/city-manager/news/city-of-pasadena-announces-new-director-of-the-rent-stabilization-department/#:~:text=After%20completing%20a%20nationwide%20search,City%20Council%20in%20December%202023.>

1 Specific information required by the ordinance, included:

- 2 a. The legal address or addresses of each Property, and all associated Rental Unit numbers or
3 addresses.
- 4 b. The legal name of the owner or ownership entity for each Property, including, but not
5 limited to, limited partners, general partners, and LLC members.
- 6 c. The name and contact information of a natural person serving as point of contact for
7 purposes of service or contact.
- 8 d. The number and size of each Rental Unit, including the number of bedrooms, bathrooms,
9 and approximate square footage of the Rental Unit.
- 10 e. The beginning and end dates (if any) of all tenancies begun or terminated within the past
11 year.
- 12 f. The amount of Rent collected over the past year for each Rental Unit during each month of
13 occupation.
- 14 g. The utilities, services, and other amenities included in the Rent for each Rental Unit.¹
15 <https://www.cityofpasadena.net/rent-stabilization/measure-h/>

16 Simply stated, nowhere in the measure, nor in the regulations promulgated pursuant thereto is
17 there a requirement that landlords must show, submit or upload actual “Notices of Rent Increase”
18 provided to their tenants.

19 Electronic registration, by landlords, could not be completed without uploading the Notices.

20 Individuals who attempted to register in person were ordered to bring hard copies of their “Rent
21 Increase Notices”. These were then taken into the custody of RSD agents and scanned into the
22 Registry Data Base. None of these agents notified individuals of their right to refuse nor did they
23 redact the information, at that time, from records received.

24 To comply with orders provided by City agents, landlords were coerced under the threat of being
25 deprived the right to collect rent, and/or suffer civil and criminal penalties including jail. violation
26 of any section or subsection of Measure H can be prosecuted as a Misdemeanor. (See Measure H
27
28

1 §1817(h)⁶ The burden of proving a valid search consent is an obligation of the People. As Justice Stewart
2 expressed: "[w]here there is coercion there cannot be consent." *Bumper v. North Carolina*, 391 U.S. 543 at p.
3 550. (1968). Petitioner asserts he was forced to provide documents. As a matter in controversy that issue
4 may need to be litigated. .

5
6 *"Whether consent to search was voluntarily given is to be determined from*
7 *the totality of all the circumstances."* *United States v. Patayan Soriano*, 361
8 *F.3d 494, 501 (9th Cir.2004) (quoting Schneckloth v. Bustamonte, 412 U.S.*
9 *218, 227, 93 S.Ct. 2041, 36 L.Ed.2d 854 (1973)).*

10 Contained in those Notices is closely held personal information involving the identities, rents,
11 locations, telephone numbers, and signatures of tenants and landlords and their staff. Uploaded
12 documents may contain meta data related to the personal computer of the uploading party⁷. On and
13 before October 23, 2025 agents of the Rent Stabilization Department were notified, in writing, that
14 the production of the rent increase documents was not required by the ordinance or the regulations
15 drafted pursuant thereto. (Email to Justin Lare)

16 Soon thereafter, the Director of the Rent Stabilization Department was forced to come to grips with
17 the fact that there was no authorization to seize, view, or keep the documents. Notwithstanding
18 notifications by Landlords, by October 30, agents of the city were still ordering landlords to
19 produce actual records documenting rent increases. That is documented in their RSD emails.
20

21 During a public hearing on November 6, the Director of the Rent Stabilization Department
22 admitted that the collection of the Notices, including the names of the tenants was dangerous.
23

24 ⁶ Article XVIII Measure H provides in Section 1817. REMEDIES. (h) Criminal Penalties. In addition to the
25 administrative penalties in subsection (g) above, any person that violates this Article may be prosecuted for a
26 misdemeanor or an infraction in accordance with the Pasadena Municipal Code, in the discretion of the City Attorney or
City Prosecutor, or their assistants.

27 ⁷ This is called metadata. It reveals a wealth of information about you and your connections, and in the hands of a
28 centralized monopoly, this can and does get misused in incredibly dangerous ways. Once such metadata is logged, it
can create very detailed profiles about who you are, everywhere you've been, and everyone you've ever spoken to.
(<https://simplex.chat/blog/20240416-dangers-of-metadata-in-messengers.html>)

1 Director Morales *admitted* "***THERE WAS AN ERROR IN THE IMPLEMENTATION OF THE***
2 ***RENT INCREASE PROCESS.***" "Landlords were required to upload the notice of rent increase
3 with (sic or), they wouldn't be able to finish the rent increase without uploading a document." "We
4 we found the error we stopped it and that is not the case going forward." (Video on City Website)
5

6 A member of the Pasadena Rental Board, Peter Drier, admitted at the same meeting that "we have
7 to have an honest answer which is we made a mistake and not blame anybody else"

8 Although this was admitted by the administrator of the City's agency and a member of the Board,
9 the City appears desirous to maintain what purports to be a searchable database of all the images of
10 the "Notices" and a searchable database of the residence addresses in conjunction with the names of
11 the tenants. This negatively affects thousands of landlords and tens of thousands of tenants who
12 may want knowledge of their residence location held in confidence.
13

14 Release of current names, addresses, and identifying information from the tenants, other residents,
15 (and in some cases some landlords), could have severe immigration consequences. Immigrant
16 parties are now placed in jeopardy because their information could be released voluntarily by the
17 City or pursuant to search warrants, subpoenas and court orders.
18

19 This is the dilemma faced by Petitioner John/Jane Doe. People hiding from creditors, or ex-
20 spouses, stalkers, or children are now subject to having their information exposed. There is nothing
21 to suggest that when confronted with a warrant or subpoena that this information could successfully
22 be withheld.
23

24 **II, PETITIONERS' RESPONSE TO THE OPPOSITION OF THE CITY OF PASADENA.**

- 25 • **Petitioner respectfully request the right to correct the record provided by the City.**

26 The opposition presented by the City Attorney contains false statements that need to be corrected.

27 The purpose of this response will be to correct the record of the quoted and bulleted statements.
28

- 1 • “On December 22, 2025, RSD provided the same documents that is the
2 subject of this petition to Petitioner’s counsel (the documents that Petitioner
3 later claimed were “seized” from him on December 16, 2025 after the
hearing.” (S2 City’s Opposition p. 3. lines 20-23)

4 Later the City Attorney stated,

- 5 • Petitioner already has in his possession the very documents that he claims
6 were seized from him. (S2 City’s Opposition p. 5. lines 6-12)
7 • The City already has provided to Petitioner the subject documents. (S2 City’s
Opposition p. 6. lines 2)

8 Mr. O’Connell is fully aware that these statements are untrue but repeatedly makes the same claim.

9 In his response. There have been at least two meetings regarding this issue. The photograph on page
10 4, is being provided to the court because the Petitioner has, despite repeated requests, been kept
11 from the requested documents. The statement should be retracted.

- 12
- 13 • Petitioner improperly brought this matter on behalf of the People of the State
14 of California and labeled himself as a Defendant. (S2 City’s Opposition p.
3.lines 5-8)
- 15 • Essentially, Petitioner either appointed himself or respondents as a
16 prosecuting agency and brought a Penal Code Section 1538.5 “Probable
Cause” hearing against the City to pursue a novel seizure of property claim.
17 (S2 City’s Opposition p. 3. lines 5-8)

18 Like the prior statement, these statements are blatantly false. First, there are two Petitioners.

19

20 Without citing any authority, Mr. O’Connell has applied a misconception perpetrated by the former
21 City Attorney in the prior case involving documents taken for use in the Rental Registry. Ms.
22 Gavin stated in Section C. of her response. Ms. Gavin stated:

23

24 C. CRIMINAL COURT IS WRONG THE FORUM TO
25 CHALLENGE LEGISLATIVE ACTS Petitioner does not have the
26 authority to bring forth criminal matters in criminal court. Legislature
27 has conferred upon district attorneys the discretion to seek either civil
28 or criminal\par sanctions for certain illegal conduct. Manduley v.
Superior Ct} (2002) 27 Cal. 4th 537, 560-61. This forum is improper
**since no district attorney has brought a criminal case against the
Petitioner. (S1 PASADENA OPPOSITION P. 5 LINES 13-19)**
Emphasis added.

1 Any fair reading of the *Manduley*, supra, case would show that it was totally inapplicable to the
2 matter before the bench on either of the Simpson requests for return of property. Manduley,
3 discussed the propriety of direct filing of juvenile cases in adult court. It had nothing to do with
4 search and seizure motions and says nothing about any relevant fact in either case.
5

6 At no time did Petitioner's seek sanctions for illegal conduct. At no time did Petitioner charge
7 anyone with a crime. Petitioner now challenges the Respondent to justify this statement.
8

9 Petitioner Simpson filed the prior action to suppress evidence of his business records that he
10 believed were improperly taken from him. He brought the action pursuant to valid California case
11 law and legislation that allowed for such an action. He further believes that these documents are
12 being retained by the city so that they can be used as evidence in the future.
13

14 Petitioner Simpson has never labeled himself a defendant, although he could be a defendant in the
15 future if the investigators in the Rental Housing Board determines there is a variance between
16 reported information and the notice. The RSD could also use his "2025 Rental Increase Notices" as
17 a baseline and decide that he has raised a future rent above what the Article provides.
18

19 According to Section 1817(h) of the Article, that could subject him to civil fees and penalties and
20 criminal fines and potentially jail. It also exposes him to the risk that the document could be used
21 against him to prove a material misstatement of a statement under oath, during registration. That
22 could be a felony, (Perjury).
23

24
25 Petitioner did not bring the action in the name of the People of the State of California, in fact if
26 anything, he brought the action against the People by way of there representative, the City
27 Prosecutor of Pasadena. He came to court as any other citizen aggrieved by what he believed to be
28 the overreach of government and the inappropriate retention of his possessions. Not only did he

1 believe his documents were improperly taken, he now believes that they are being improperly
2 retained. There was never any legitimate consent to provide these documents, but to the extent the
3 government believes there was, he now rescinds any misperceived consent to retain.
4

5 His action was taken after careful contemplation of the Constitutional principles involved. Mr.
6 Simpson is an 80 year old ex-policeman and well aware of the issues when evidence is taken by
7 coercion. He only asked that the court take testimony to prove voluntariness. He notes, "Whether
8 consent to search was voluntarily given is to be determined from the totality of all the
9 circumstances." *United States v. Patayan Soriano, 361 F.3d 494, 501 (9th Cir.2004)* (quoting
10 *Schneckloth v. Bustamonte, 412 U.S. 218, 227, 93 S.Ct. 2041, 36 L.Ed.2d 854 (1973)*). (See also
11 *Bumper v. North Carolina, 391 U.S. 543 at p. 550. (1968)*)
12

13 He believed he had a reasonable expectation in the privacy of his personal papers. He relied on
14 US Constitution, the Civil Code and Article 1 §1 of the California Constitution, these rights are
15 reasonably expected. *City of L. A. v. Patel, 135 S.Ct. 2443, 192 L.Ed.2d 435, 576 U.S. 409, 414*
16 *(2015)*"
17

18
19 He moved for the return of property pursuant to a Penal Code section that allows for such a motion
20 and pursuant to case law that also so provides. He did not appear as a District Attorney he came to
21 court in the same way as the litigants in *PEOPLE of the State of California, Petitioner, v. SUPERIOR*
22 *COURT, ORANGE COUNTY, Respondent, Frederick Arnold Loar et al., Real Parties In Interest.*
23 *PEOPLE of the State of California, Plaintiff and Appellant, v. Frederick Arnold LOAR and Kay*
24 *Nancy Loar, Defendants and Respondents* 28 Cal.App.3d 600, 104 Cal.Rptr. 876.
25

26 The *Loar* Court, (Supra), specifically dealt with situations where a non-defendant comes to court
27 seeking the return of property and the suppression of evidence that could be used against him in the
28 future. In *Loar*, the Court was confronted by individuals requesting the return of films and photos,

1 (documents), seized by the government. At the time of the hearing, there were no charges pending
2 against the parties. The People challenged the power of the court to order return of seized materials
3 which were not introduced into evidence and which remained in possession of the chief of police on
4 two grounds: (1) The court lacked jurisdiction to entertain a summary proceeding in the criminal
5 action for return of the seized materials and (2) defendants were not entitled to have the seized
6 materials returned absent a prior judicial determination. The appellate court rejected both arguments.

7 *People v. Loar* supra, p. 607.

8
9 Citing *Gershenhorn v. Superior Court*, Supra, 227 Cal.App.2d 361, 38 Cal.Rptr. 576, the
10 court stated, a summary proceeding by nonstatutory motion for return of property, was an
11 appropriate remedy even as to property still in possession of the seizing officer. The court,
12 looking at what had been done in *Gershenhorn*, supra, stated,

13
14 “The court rejected the identical contention now urged by the
15 People that the owner should be relegated to an independent
16 civil action, stating: 'And the expense and complications of
17 bonds and other procedures involved in claim and delivery
18 seem an unnecessary apparatus to recover property which,
19 as we shall show, is already in the hands of the court.'" *People v.*
20 *Loar* supra, p. 609.

21
22 Again, citing *Gershenhorn*, the court stated,

23 We deal with property seized by a public officer, acting under the
24 color of his status as a law enforcement officer, and seized solely
25 on the theory that it constitutes a part of the evidence on which
26 judicial action against its owner or possessor will be taken. We
27 regard property so taken and so held as being as much held on
28 behalf of the court in which the contemplated prosecution will be
instituted as is property taken and held under a warrant. The
seizing officer claims no right in or to the property, or in or to its
possession, save and except as the court may find use for it. He
must respond, as does any custodian, to the orders of the court

1 for which he acted.' (227 Cal.App.2d at p. 366, 38 Cal.Rptr. at p.
2 579.).

3 The court went on to say, "We conclude that the court below had jurisdiction to entertain
4 defendants' motion for return of the seized materials. *People v. Superior Court (Loar)* , 28
5 Cal.App.3d 600, 104 Cal.Rptr. 876 (Cal. App. 1972), 612" (emphasis added).
6

7
8 Petitioner Doe never made any statements that indicated that he/she was either a District Attorney or
9 a defendant. Petitioner Doe asked to come to court as an innocent victim of government error and
10 overreach. Instead, Petitioner Doe relied on Penal Code 1538.5 and on cases like *Ensoniq Corp v*
11 *Superior Court* (1998) 65 CA 4th 1537, 1547; *Buker v Superior Court* (1972) 25 CA3d 1085, 1089.

12
13 She relied on case law that states a right to regain property and suppress evidence even when the
14 property was seized without a warrant. See *Gershenhorn v Superior Court* (1964) 227 CA2d 361,
15 366.

16
17 She relied on the statements of the Ensonic Court which noted, "[2] The right to regain possession
18 of one's property is a substantial right. (*Franklin v. Municipal Court* (1972) 26 Cal. App. 3d 884,
19 896 [103 Cal. Rptr. 354].) "Continued official retention of legal property with no further criminal
20 action pending violates the owner's due process rights." (*People v. Lamonte* (1997) 53 Cal. App. 4th
21 544, 549 [61 Cal. Rptr. 2d 810].) Therefore, "[o]ne who is in possession of property under a claim
22 of right cannot be deprived of its possession without due process of law." (*Modern Loan Co. v.*
23 *Police Court* (1910) 12 Cal. App. 582, 585 [108 P. 56] (*hereafter, Modern Loan Co.*))" *Ensoniq*
24 *Corp v Superior Court* (1998) 65 CA 4th 1537, 1547
25

26 The court further stated:

27 [4] The Penal Code provides for return or delivery of property
28 seized under warrant. The trial court is empowered to entertain a
motion for return of seized items by section 1536, as well as by the
court's inherent power to control and prevent the abuse of its

1 process. (*People v. Superior Court* (1972) 28 Cal. App. 3d 600, 607
2 [104 Cal. Rptr. 876]; *People v. Icenogle, supra*, 164 Cal.App.3d at
3 p. 623.) If no criminal action is pending, an owner's motion for
4 return of seized property is classified as a special proceeding.
5 (*Avelar v. Superior Court* (1992) 7 Cal. App. 4th 1270, 1276 [9
6 Cal. Rptr. 2d 536] [motion under §§1539-1540 is a special
7 proceeding].) A **"special proceeding" is one which is distinct
8 from any underlying litigation. (7 Cal.App.4th at p. 1275.)
9 (emphasis added)**

10 Both criminal defendants and nondefendants may move for return
11 of seized property because the search warrant or seizure was
12 unlawful. A defendant may move for return of property or
13 suppression of evidence pursuant to sections 1538.5 and 1540, on
14 grounds that the search or seizure was illegal, or the warrant was
15 insufficient on its face. (*Buker v. Superior Court* (1972) 25 Cal.
16 App. 3d 1085, 1088 [102 Cal. Rptr. 494].) Under sections 1539-
17 1540, a nondefendant may move for return of property on grounds
18 that the property taken was not the same as that described in the
19 warrant, or that there was no probable cause to believe the existence
20 of the grounds on which the warrant was issued. (*People v.*
21 *Superior Court (Chico etc. Health Center)* (1986) 187 Cal. App. 3d
22 648, 650 [232 Cal. Rptr. 165].) *Ensoniq Corp v Superior Court*
23 (1998) 65 CA 4th 1537, 154

24 Where no criminal charges are ever filed, and you therefore have no pending 'case' in which you can
25 file your motion, the motion for return of property will be treated as a 'special proceeding'. *People v*
26 *Superior Court (Aquino)*. The case title in a special proceeding may be based upon a description of
27 the seized property and the person from whom it was seized. For example: "In re 36 Video Tapes
28 Seized from Lieutenant Colonel and Mrs. Michael Aquino." You should serve the motion on the
entity holding the property, such as the police department, as well as the prosecutor who originally
sought the search warrant, if there was one. *People v Superior Court (Aquino)*, 201 Cal. App. 3d
1346 (1988).

Petitioner wanted to come to the Court as a supplicant, not as a District Attorney. She would like to
sleep at night without worrying that her information has been added to a database of Pasadena
Tenants.

1 Neither Petitioner acted as a District Attorney nor as defendant. They came to court to seek justice.

2 The City Attorney should retract this allegation.

- 3
- 4 • This forum is improper since no district attorney or city prosecutor has
5 brought a criminal case against the Petitioner. (S2 City’s Opposition p. 4. lines
6 17-19). See Also (S2 City’s Opposition p. 5. lines 20-25) suggesting that a
7 requestor must be a defendant.

8 The City Attorneys statements are specious.

9 If no criminal action is pending, an owner's motion for return of seized property is classified as a
10 special proceeding. (*Avelar v. Superior Court (1992) 7 Cal. App. 4th 1270, 1276 [9 Cal. Rptr. 2d*
11 *536]* [motion under §§1539-1540 is a special proceeding.]) A **"special proceeding" is one which**
12 **is distinct from any underlying litigation. (Avelar, supra, 7 Cal.App.4th at p. 1275.) (emphasis**
13 **added).**

14 The Ensoniq, supra, 65 Cal.App.4th 1537 (Cal. App. 1998) court goes on to say, “Both criminal
15 defendants and nondefendants may move for return of seized property because the search warrant
16 or seizure was unlawful.” id. P. 1547. The Ensonic court then went further, stating, “Under
17 sections 1539-1540, a nondefendant may move for return of property on grounds that the property
18 taken was not the same as that described in the warrant, or that there was no probable cause to
19 believe the existence of the grounds on which the warrant was issued. (People v. Superior Court
20 (Chico etc. Health Center) (1986) 187 Cal. App. 3d 648, 650 [232 Cal. Rptr. 165].)”

21
22
23 The City Attorney fails to cite a single case that states that the Petitioner must be a defendant. His
24 statements are misleading and should be retracted.

25 Respondent further alleges that the Petitioners lack standing. In the context of search and seizure
26 law, the issue of standing is determined by whether or not there has been an invasion into a
27 person’s area of “reasonable expectation of privacy” *Katz v. United States*, 389 U.S. 347, 360
28

1 (1967) (Harlan, J., concurring). When the government ordered the registrants to undertake a
2 search of their private computer files, for a governmental purpose and without probable cause, it
3 invaded an area in which they had a reasonable expectation of privacy.
4

5 The coercive demand to produce and provide copies of the actual documents was a seizure. The
6 uploading of the documents and their transition into a searchable data base constitutes an
7 additional seizure and any use of the documents would constitute a search. Unlike tort law,
8 violations of the Fourth Amendment do not require injury. The harm is done at the time of each
9 and every intrusion. Damage is also done by improper retention.
10

11 Similarly, when documents were seized, under color of authority, from the hands of Petitioner's
12 attorney, then scurried out of the courtroom and now retained by the City, there has been a
13 constitutional intrusion.
14

15 Respondent assumes there is no harm. The People forget that they are still retaining the property
16 of the PETITIONERS. Any use of these documents should be considered "Fruit of the Poisonous
17 Tree". *Silverthorne Lumber Co., Inc. v. United States, 251 U.S. 385 (1920)*.

18 The seized materials are being held in evidence, and can be used now, or in the future to prove an
19 economic violation of Measure H. The documents serve as an economic baseline. The
20 documents are also available to hunt down, or prove the residency, for immigration or other
21 evidentiary purposes, against the tenants. Maintaining evidence against parties, may be beneficial
22 to the government, but could obviously prove harmful to the document's owners, in the future.
23

24 All the seized documents remain available to the government, for investigative and prosecutorial
25 purposes. The court must also consider that any violation, of any clause in the 42 pages of
26
27
28

1 Measure H, can be prosecuted as a misdemeanor⁸. If there is a variance between the information
2 provided to the registry and what is stated in the “Rent Increase Notice” the documents could be
3 used to prove perjury.

- 4
- 5 • Moreover, the Form LASC CRIM 309 form upon which Petition is pled,
6 requires copies must be provided to “...the arresting agency, and the
7 prosecuting agency.” While hesitating to state the obvious, there is neither an
8 arresting agency nor a prosecuting agency involved in matter. (S2 City’s
9 Opposition p. 4. lines 19-22)

10 The City Attorney argues that because there is no arresting agency or prosecuting agency, ALL
11 PETITIONERS are precluded from requesting the return of property. The form used is not
12 dispositive, it was used to demonstrate principles previously stated in this response. Other counties,
13 like Orange, use similar forms. The form is a vehicle to allow parties to quickly regain their
14 property or suppress evidence. Case PDPC 25-00069-1, Simpson 1, was filed in traditional brief
15 form and the City did not like that any better.

16 The form is significant and was used because it acknowledges what has already been said about the
17 return of property to parties who have not been arrested or charged and when the property is not
18 taken by warrant and when no charges have been filed.

19

20 In this case, the Petitioners filed three Declaration supporting the belief that property was taken and
21 being held by a government official in support of a decision to withhold both Petitioners documents
22 without their permission. The documents in question are necessary to show the City’s non-

23

24

25

26 ⁸ 1817. REMEDIES. (h) Criminal Penalties. In addition to the administrative penalties in subsection
27 (g) above, any person that violates this Article may be prosecuted for a misdemeanor or an infraction
28 in accordance with the Pasadena Municipal Code, in the discretion of the City Attorney or City
Prosecutor, or their assistants.

1 compliance with discovery requests and subpoena's. Its torn appearance indicates the disdain for
2 other parties appeals to the court to protect their right to privacy and protection of their possessions.

3
4 These documents were served on all parties requiring notice of this action. The City, the City
5 Attorney, The Pasadena City Prosecutor, and the District Attorney of Los Angeles County. In this
6 case the City Official was the party who seized documents. It was done to investigate allegations
7 that had been made that the items did not conform to the requirements of code. It was also done to
8 make it impossible to use the documents in any further proceedings in case PDPC 25-00069-01.

9
10 The form used is not dispositive. All parties were placed on notice that the Petitioners were
11 requesting the return of their property.

- 12
13 • "Since City immediately recognized that Petitioner's original motion in the
14 prior matter was misplaced if not downright fanciful, the City acknowledged it
15 had an obligation to cooperate in getting Petitioner the requested information
16 as if it were a request pursuant to the California Public Records Act
(Government Code Section 7920.000, et seq.)" (S2 City's Opposition p. 5.
lines 3-6)

17 Imagine if the District Attorney were to say in court, "We do not believe in the request for
18 discovery, given under PC. 1054, so we decided to provide less than required to provide due
19 process." The initial reaction would be that that is a decision for the Court, not the District
20 Attorney. Yet that is exactly how the Pasadena City Attorney has handled every part of this case. In
21 this context, the City is the Policing agency and it should not be their decision on how to when
22 confronted asked to see that justice is done.

- 23
24
25 • *A Fourth Amendment "search" occurs when the government either*
26 *physically intrudes upon persons, houses, papers, or effects or invades a*
27 *person's reasonable expectation of privacy in one of the constitutionally*
enumerated areas. Hotop v. City of San Jose (9th Cir. 2020) 982 F.3d
710.. (S1 PASADENA OPPOSITION P. 8 LINES 22-25)

1 The City Attorney cites Hotop, Supra, but has failed to analyze what that case said about the Fourth
2 Amendment. The Hotop court clearly said that even a regulatory taking could trigger Fourth
3 Amendment consideration. The court ruled in Hotop that it could not deal with Fourth Amendment
4 issues because those issues were never previously raised. In both of the cases filed by Petitioners,
5 those issues are in the forefront. Both cases deserve consideration of their search issues. *(See Patel*
6 *v. City of Los Angeles, 738 F.3d 1058 (9th Cir. 2013) (en banc), aff'd, 576 U.S. 409 (2015).*

7
8 Petitioner requests the court carefully review the Hotop decision.

- 9
- 10 • **“A. PETITIONERS CLAIM IS WITHIN THE CIVIL COURT
11 SUBJECT MATTER JURISDICTION, NOT THIS CRIMINAL
12 COURT California criminal courts have subject matter jurisdiction
13 over criminal offenses defined by California statutes. The Petitioner’s
14 motion involves no criminal action as it is based on a challenge to RSD’s
15 registry procedure that requested notices of rent increase. (Petitioner’s
16 Motion, p. 5.) Pasadena Charter Article XVIII and Civil Code section
17 1947.7 (g) give RSD the authority to obtain information to regulate
18 rental rates, including the amount of rent for a rental unit and the
19 amount of any subsequent rent increases. Petitioner asserts that
20 Measure H and the Regulations do not expressly require rent increase
21 notices. The aforementioned challenges the procedure of legislative
22 action, not criminal activity. “When the Legislature confers legislative
23 power on a municipal body, a judicial or executive body may not
24 interfere with that legislative power, except as the Legislature
25 authorizes. *D’Amato v. Superior Ct. (2008) 167 Cal. App. 4th 861.*
26 *Petitioner admits that “no criminal charges, are pending, no active
27 investigations have been announced....” (Petitioner’s Motion, p. 15.)***
 - 28 • **“The powers of state government are legislative, executive, and judicial.
Persons charged with the exercise of one power may not exercise either
of the others except as permitted by this Constitution.” Cal. Const. art.
III, § 3. This Court’s jurisdiction does not extend to determining the
validity or dictating the procedural regulation methods of the
Pasadena’s Charter, the Civil Code, or RSD’s registry. “(S1
PASADENA OPPOSITION P. 4 LINES 5-22)**

25 The case before the bench was filed to demonstrate the inability of the City of Pasadena to
26 distinguish between the taking of information and the taking of tangible items in the possession of
27 others.
28

1 In the first Simpson case, the city attorney argued that the taking of the Rent Increase Notices was
2 nothing more than a legislative act and a request for the information that was included in the
3 documents. While Measure H may require the posting of information, there is nothing in the statute
4 that requires the uploading of actual documents. The taking of these documents was not a
5 legislative act, it was an exercise of police power by a governmental entity that has the power to
6 investigate, serve subpoenas, fine individuals, prosecute crimes, and sit in judgement. Measure H,
7 Section 1811.(e) "PASADENA RENTAL HOUSING BOARD.(e) Powers and Duties."

9
10 That same code section provides the Rental Board and the Rent Stabilization Department the power
11 to use subpoenas in the course of its investigations. None were used and the Petitioner was given
12 no opportunity to object.⁹

13
14 The Rent Notices were either taken by mistake, or they were taken for an investigative purpose.
15 The proof that the documents were seized for investigative purposes is clear. If they were not, then
16 the City should have no problem returning them since they have no further use for the items. The
17 City may have some, but not all, of the information required by the registry, but the City has
18 nowhere in its arguments justified the search, seizure and now continued retention of the tangible
19 property of the Petitioners.

20
21 The irony should not be lost on the court. Is the City now arguing that the taking, by force, of
22 documents provided to the petitioner, a legislative act? Is it merely the taking of information? Or
23 was it the taking of tangible property? Another word for that might be seizure.

24
25
26
27
28 ⁹ Similarly, no subpoenas, orders or warrants were used during the seizure of the documents in this case. There was no please, there was never even a verbal request. If the City Attorney believed something was wrong, all she had to do was make a request to the court.

- 1 • Apparently, after the hearing, there was a difference of opinion between
2 Petitioner’s counsel and City’s counsel as to who had control of documents ...
(S2 City’s Opposition p. 3. lines 14-18)

3 It goes without saying that the City Attorney provides no facts to back up this remarkable
4 statement. The parties were discussing the fact that the City had not complied with their obligations
5 under the subpoena when the representative of the City got angry and ripped away the evidence of
6 wrongdoing. Without evidence to back up his allegation this statement should be retracted.
7

- 8 • c. THE PRIOR DISMISSAL WITH PREJUDICE BARS THIS MATTER
9 “The statutory term ‘with prejudice’ clearly means the plaintiff’s right of
10 action is terminated and may not be revived.... [A] dismissal with prejudice ...
11 bars any future action on the 4th same subject matter.” Boeken v. Philip
12 Morris USA Inc. (2010) 48 Cal. 788, 810. Petitioner is attempting to
13 circumvent the Dismissal with Prejudice ordered in Case No. 25PDPC00069-
01. The Petition and all of Petitioner’s related motions should be dismissed
with prejudice (again). (S2 City’s Opposition p. 5. lines 13-19)

14 The Respondent’s use of the application of collateral estoppel and Res Adjudicata is completely
15 misplaced. No facts were presented at the prior hearing. Instead, the court ruled that it lacked
16 jurisdiction to hear the case. The court treated the hearing as a Demurrer. Its finding of a lack of
17 suggests that it could go no further than a simple dismissal because it lacked jurisdiction to even
18 proceed on the matter.

19 Even the City Attorney conceded that if this was not the proper forum that the Petitioners could
20 bring an action in civil court. The court heard no evidence and made no factual findings and for
21 that reason there should be no collateral estoppel.
22

23 The case cited by the Respondent has nothing to do with the facts before this court. The Boeken,
24 Supra, court ruled in a case in which a spouse sued for the loss of consortium with her husband
25 when he became inflicted with cancer because of the consumption of cigarettes. Prior to trial, the
26 spouse herself asked the court to dismiss the loss of consortium action with prejudice. After her
27 spouse died, the plaintiff filed a wrongful death action and again alleged loss of consortium. The
28

1 court held that she was collaterally estopped because she filed for the same loss to which she had
2 agreed could be “dismissed with prejudice”

3
4 That is completely different than the case before the bench. In Simpson 1, PDPC 00069-1.

5 Petitioners alleged the seizure of Rent Notices, taken by the Pasadena Rental Stabilization
6 Department. In this case, PDPC 00001-01, the Petitioners allege the taking of different property, at
7 a different time, and under completely different circumstances. The facts of one do not interact
8 with the other except that they occurred during the hearing on the first Simpson case. Since the
9 intrusions are completely different one case should have no impact on the other.

10
11
12 **III. THE CITY OF PASADENA FAILED TO RESPOND**
13 **TO MOTIONS TO SEAL AND MOTION TO RECUSE**

14 It is not clear why the Respondents failed to discuss the two preliminary motions in this case. Both
15 the District Attorney of the County of Los Angeles and the City Prosecutor of the City of Pasadena
16 have been duly notified about the case motion to recuse. Neither have responded and from their
17 inaction apparently do not oppose the recusal.

18
19 John/Jane Doe is on call to her Attorney. She is prepared to testify if needed through the court’s on
20 line process. To the extent that it needs to be said, Counsel for Petitioner Doe does hereby request
21 the right to allow her to attend the proceedings remotely and anonymously.

22
23 Since there is no stated opposition to the motions, the court should consider granting them.

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ATTACHMENTS/Exhibits

McMillan, Acquanette (Netta)

From: Jen Collins
Sent: Monday, April 6, 2026 3:27 PM
To: PublicComment-AutoResponse
Subject: Public comment, City Council Meeting, Item 20, 04/06/26

[1] **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.

Dear City Councilmembers and Mayor Gordo,

I am a Pasadena resident in District 5, and I'm writing regarding Agenda Item 20, and the City's approach to immigration enforcement.

I'd like to acknowledge and thank those of you who have already spoken out against unlawful surveillance of residents and unlawful immigration enforcement activity during these discussions. Your leadership is important to us, and our community is paying attention.

There is immediacy to our need for action, so I am pleased the Council is reexamining this matter tonight. The policies Pasadena adopts now will directly impact whether Pasadena neighbors feel safer here where we live.

I appreciate the Council's effort to clarify procedures and protect City resources. It's critical that this goes beyond broad language. City-owned and City-controlled spaces such as our parks, parking lots, schools, and other public areas must be explicitly off limits for any federal immigration enforcement activity. These spaces should never be used as staging areas or operational grounds. And as regards any future immigration presence in Pasadena, I appreciate and support the Council's decision to implement regular, public-facing updates. The community needs clarity and transparency about what is happening.

Also, First Amendment protections must be unequivocal. Pasadenans have the right to observe, document, and speak about immigration enforcement activity without facing additional barriers or restrictions. Community oversight is a necessary form of accountability. Legal observers must be explicitly protected. The arrest of Jose Madera in January for observing ICE activity remains deeply concerning. Incidents like that undermine trust and cannot be allowed to happen again.

Finally, the company Flock Safety, and the concentration of their cameras in specific areas, raise serious equity concerns. Flock has proven itself untrustworthy in many American cities and counties, as we discussed at last month's Public Safety Committee meeting, when I commented on many localities that have discontinued using this technology. That same evening, our neighboring city, South Pasadena, voted to roll back their use of Flock cameras. Pasadena Districts 3 and 5 already experience disproportionate policing and surveillance as evidenced by the number of cameras concentrated in these areas. Expanding this infrastructure only deepens harm caused to these neighborhoods. As Councilmember Hampton has advocated, the City should cancel the use of these cameras and bring this issue back for full public discussion.

Thank you for your consideration of this matter. As your neighbor, I urge you to take stronger action.

Sincerely,
Jennifer Collins