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County of Los Angeles  
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David W. Slayton,  
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By S. Ruiz, Deputy Clerk

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**

14 GEORGE ABRAHAMS FOUNDATION, a non- )  
15 profit corporation; CARLTON SERRANO )  
16 TENANTS ASSOCIATION, an unincorporated )  
17 association; )  
18 Petitioners, )  
19 vs. )  
20 CITY OF LOS ANGELES, a public body )  
21 corporate and politic, and DOES 1 through 10, )  
22 inclusive; )  
23 Respondents, )  
24 MARIA FLORES, an individual, and 5430 )  
25 CARLTON LLC, a limited liability company, )  
26 and DOES 11 through 20, inclusive )  
27 Real Parties in Interest. )  
28

Case No. **25STCP04183**

**VERIFIED PETITION FOR WRIT OF  
MANDATE**

(California Environmental Quality Act)

1 **INTRODUCTION**

2 1. This action challenges the approval of the West Carlton Way Project, a 139-unit  
3 development located at 5416-5418, 5420, 5425-5428 and 5430 West Carlton Way (“Project”), by  
4 Respondent City of Los Angeles (“City”). The Project includes the demolition of seven existing  
5 residential buildings and accessory uses that will result in the loss of 25 affordable dwelling units,  
6 which are subject to the City’s Rent Stabilization Ordinance (“RSO”). The buildings subject to  
7 demolition include a 16-unit apartment building, a four-unit apartment building, three single family  
8 dwellings, and a duplex two-unit building. The Project proposed to retain an existing eight-unit  
9 apartment building on site and the construction and use of a new eight-story, 131-unit apartment for a  
10 total of 139 units on a 0.87 acre site, 15 of which are proposed to be restricted to Very Low Income  
11 Households. The Project also includes removal of 17 mature trees for the construction of the new  
12 building, including several mature protected trees.

13 2. The City improperly granted ten “Off-Menu Incentives and Waivers of Development  
14 Standards” in violation of Government Code Sections 65915(e)(1), 65915(d)(1)(B) and 65915(d)(3).  
15 The Project was not appropriately qualified for such incentives and waivers, and presents significant  
16 impacts to health, safety, and the environment. The City failed to adequately analyze the necessity and  
17 impacts of these waivers and incentives.

18 3. The City violated the California Environmental Quality Act (“CEQA”), Pub. Res. Code §  
19 21000, *et seq.*, in several respects. The City improperly determined that the Project is exempt from  
20 CEQA despite the Project’s significant adverse environmental impacts identified by the appellants and  
21 multiple members of the community in public comments.

22 4. While the Project utilizes incentives, waivers and bonuses under the Density  
23 Bonus/Affordable Housing Incentive Program, as proposed the Project will not only lead to significant  
24 environmental impacts, but also is inconsistent with the City’s RSO. The Project will lead to the loss of  
25 long-standing rent stabilized units and the displacement of tenants who have been residents for many  
26 years.  
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1 aesthetic, scientific, and environmental interests of Petitioner. The interests of Petitioner have been and  
2 will continue to be adversely affected by Respondents' unlawful actions. The relief sought in this Petition  
3 would redress Petitioner's injuries.

4 10. Respondent City of Los Angeles is a political subdivision of the State of California and the  
5 County of Los Angeles and a California charter city and municipal corporation exercising local  
6 government powers, as specified by the Constitution and the laws of the State of California.

7 11. Petitioners does not know the true names or capacities of the persons or entities sued herein as  
8 Does 1 through 10, and therefore sues these respondents by such fictitious names. Petitioner will amend  
9 the Petition to set forth the names and capacities of said respondents along with appropriate charging  
10 allegations when the same have been ascertained.

11 12. Real Parties in Interest Maria Flores and 5430 Carlton, LLC are the Project applicant, and/or  
12 owner, and/or recipient of Project approval.

13 13. Petitioners do not know the true names or capacities of the persons or entities sued herein as  
14 Does 11 through 20, and therefore sues these real parties in interest by such fictitious names. Petitioners  
15 will amend the Petition to set forth the names and capacities of said real parties in interest along with  
16 appropriate charging allegations when the same have been ascertained.

17 **FACTUAL BACKGROUND**

18 14. The Project is located at 5416–5418, 5420, 5424–5428, and 5430 West Carlton Way in the  
19 City of Los Angeles, within the Hollywood Community Plan area and Subarea A of the Vermont/Western  
20 Station Neighborhood Area Plan (“SNAP”). The Project Site and the surrounding neighborhood primarily  
21 consist of one-to two-story apartment buildings built between 1916 and 1948, which includes affordable,  
22 and rent-stabilized housing for low-income residents. The surrounding area includes apartment buildings  
23 that hold significant historical and architectural value complemented by lush trees and landscapes.

24 15. The Project Site is approximately 37,688 square feet (0.87 acres) and is currently developed  
25 with seven existing residential buildings, including a 16-unit apartment building, a four-unit apartment  
26 building, three single-family dwellings, and a duplex. The Project Site includes at least 23 existing mature  
27 on-site and street trees of various types in good health, including protected species of oak and sycamore  
28 trees.

1           16. The Project proposes the demolition of seven existing residential buildings and the  
2 construction, use and maintenance of a new 131-unit apartment building with 15 units restricted to  
3 Very Low Income Households and an maintenance of an existing eight-unit apartment building, for a  
4 total of 139 units. The demolition of the existing buildings will result in the loss of 25 occupied and  
5 rent-stabilized dwelling units that are subject to the City’s RSO.

6           17. The Project also includes the removal of two mature street trees, three on-site protected trees,  
7 and 12 on-site non-protected mature trees. The Project proposes to replace the existing mature trees with  
8 35 on-site and ten street trees.

9           18. The proposed 139-unit apartment complex is comprised of an eight-story, approximately  
10 105-foot residential building, with one at-grade parking level and two and one-half subterranean  
11 parking levels. The Project has a total of 144,851 square feet of floor area resulting in a floor area ratio  
12 (FAR) of 4.8:1.

13           19. On May 8, 2025, the Los Angeles City Planning Commission (“CPC”) conducted a public  
14 hearing and approved the Project under Case No. CPC-2024-914-DB-SPPC-VHCA, granting multiple  
15 Off-Menu Incentives and Waivers of Development Standards under the State Density Bonus Law and Los  
16 Angeles Municipal Code Section 12.22(A)(25). The CPC approved incentives and waivers from  
17 development standards in the SNAP and the Municipal Code in relation to height, lot consolidation, open  
18 space, rear and side yard setbacks, rooflines, passageway width, and the space between buildings.

19           20. Among others, the CPC approved a waiver of the maximum height limit provided in SNAP  
20 Section 7.D for a 66-foot, 6-inch height increase to permit a maximum building height of 105-feet, 4-  
21 inches. SNAP Section 7.D provides: “any project shall not exceed a height that is within 15 feet of the  
22 height of the shortest existing building on any adjacent lot.” The shortest adjacent structure is  
23 approximately 23 feet, and the maximum permitted height under SNAP is 38 feet. The Project exceeds the  
24 maximum allowed height by approximately 176 percent.

25           21. The CPC approved a waiver for a 74.4% reduction in required open space to permit a 3,405  
26 square feet of open space, in lieu of 13,300 square feet, as otherwise required by SNAP Section 7.F and  
27 Municipal Code Section 12.21-G2.  
28

1           22. The CPC also approved a waiver of development standards regarding combination of lots and  
2 the maximum allowed lot size as outlined in SNAP Section 7.A. Section 7.A allows a maximum of two  
3 lots to be tied together with a total combined area of 15,000 square feet. The CPC approved a waiver of  
4 this standard to permit for four lots to be tied together totaling to a combined area of 37,688 square feet,  
5 more than double the allowed consolidation.

6           23. The CPC further approved multiple waivers of building setback and yard requirements  
7 provided under Municipal Code Section 12.11-C, for approximately 70% rear yard reduction and 54.6%  
8 side yard reduction. And the CPC approved a waiver of the requirements under Municipal Code 12.21-C  
9 for a 72.8% passageway reduction to permit a 6-foot passageway in addition to a 58.4% reduction of the  
10 space between buildings to permit 9-foot 2-inch width between buildings.

11           24. The CPC also determined that the Project is categorically exempt from CEQA review under  
12 Class 32 (Infill Development Projects) exemption.

13           25. The City published a Letter of Determination dated June 24, 2025 describing the actions of  
14 CPC at the May 8, 2025 meeting. The Letter identified that the decision of the CPC “as it relates to the  
15 Density Bonus Off-Menu Incentives and Waivers of Development Standards are not further appealable.”  
16 For the remaining items, the Letter stated that the final appeal date was July 9, 2025.

17           26. Two timely appeals were filed challenging the CPC’s approval: Petitioner CSTA filed an  
18 appeal on July 5, 2025 and the Supporters Alliance for Environmental Responsibility (“SAFER”) filed an  
19 appeal on June 25, 2025.

20           27. The appellants challenged the CEQA exemption, raising issues with the potential significant  
21 impacts of the Project, including air quality and water quality, greenhouse gas emissions, noise, traffic and  
22 parking impacts, significant impacts associated with fire and emergency services, significant impacts on  
23 historical resources and biological resources, including loss of habitat and green space.

24           28. Specifically, SAFER raised concerns about the City’s reliance on the CEQA Infill Exemption  
25 asserting that substantial evidence demonstrates that the Project will have significant adverse air quality  
26 impacts and significant health risks. SAFER provided a detailed expert analysis from Soil/Water/Air  
27 Protection Enterprise (“SWAPE”) regarding the Project impacts. They also noted that these impacts  
28

1 coupled with the Project’s proximity to sensitive receptors and the removal of mature trees constitute  
2 unusual circumstances and cumulative impacts.

3 29. CSTA raised concerns with the Project’s inconsistency with SNAP’s development standards  
4 and CEQA, impacts on environmental and historical resources, issues related to tenant displacement, loss  
5 of rent-stabilized units, and inconsistency with the requirements for replacement of existing rent-stabilized  
6 units. In its appeal, CSTA noted that the Project will result in a net loss of rent-stabilized units in violation  
7 of the City’s RSO, and will displace approximately 50 tenants from 25 RSO-protected units, replacing  
8 them with only 15 units restricted to Very Low Income Households.

9 30. CSTA further asserted that the approval of the Project with extensive off-menu incentives and  
10 waivers is against “the very principle of SNAP itself,” and inconsistent with many requirements and  
11 standards set forth in SNAP and the Municipal Code. Its appeal noted the incentives and waivers amount  
12 to 322.5% increase of roof-line breaks, 151.25% increase of maximum permitted lot size, 74.4 decrease of  
13 required open space 70% decrease of the required rear yard space, 54.54% decrease of the required side  
14 yard space, and 58.3% decrease of required space between buildings. CSTA explained that these  
15 substantial deviations from SNAP requirements are not necessary for provision of affordable housing and  
16 results in a project that does not fit the neighborhood character.

17 31. On September 9, 2025, the Planning and Land Use Management (“PLUM”) Committee held a  
18 public hearing. The PLUM Committee recommended denying the appeals pending City Council approval.

19 32. On September 10, 2025 the City Council held a hearing to consider the appeals and the  
20 Project. The PLUM Committee recommended the Council to deny the appeals and approve the Project  
21 and determine that the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15332, Class  
22 32 and that there is no substantial evidence demonstrating that an exception to a categorical exemption  
23 pursuant to CEQA Guidelines, Section 15300.2 applies. The PLUM Committee further recommended the  
24 Council to adopt the findings of the CPC as the findings of the Council.

25 33. In advance of the PLUM and City Council meetings, Petitioners and numerous other members  
26 of the public submitted written and oral comments in opposition to such approvals. The comments  
27 submitted to the City noted the Project’s inconsistency with the Municipal Code, SNAP and CEQA.  
28 Commenters raised concerns about the waivers and incentives approved for the Project. Commenters

1 noted the City’s failure to adopt adequate findings to justify the necessity of the incentives and waivers for  
2 affordability and the lack of clear information and supported analysis.

3 34. Commenters emphasized that the approved incentives and waivers were associated with  
4 design elements unrelated to affordable housing. The Project plans allocated approximately 35,000 square  
5 feet of space designated as “resident co-working” without an explanation as to its necessity for  
6 “affordable” housing. This square footage was used to justify the waivers, even though it did not  
7 contribute to the provision of affordable housing.

8 35. Furthermore, residents urged the City to consider the comments surrounding fire safety,  
9 emergency evacuation access, and the obstruction of light, air and the reduction of yard setbacks and  
10 passageways.

11 36. Commenters also raised issues related to tree removal proposed for the Project, asserting that  
12 the Project violates the Municipal Code and SNAP requirements for tree removal. They noted that the  
13 protected trees that are proposed to be removed are mature and in good health, and provide vital habitat  
14 for wildlife, and much-needed cooling to the community, which helps offset the significant impacts of  
15 urban heat islands and climate change.

16 37. Commenters also noted the historical significance of the existing houses, the Project’s  
17 proximity to the Serrano Historic District and explained that the demolition of the existing houses would  
18 erode the area’s architectural and cultural fabric.

19 38. Despite many concerns about the Project and issues raised, the City Council voted to approve  
20 the Project.

21 39. A Notice of Exemption was filed by the City on September 22, 2025.

22 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**  
23 **AND INADEQUATE REMEDIES AT LAW**

24 40. Petitioners have exhausted all available administrative remedies, and objections to the  
25 approval of the Project, as required by Public Resources Code Section 21177. These include, but are  
26 not limited to, letters and oral comments presented during public hearings.  
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1 41. Petitioners have complied with the requirements of Public Resources Code Section  
2 21167.5 by mailing a written notice of commencement of this action to the City. A true and correct  
3 copy of that notice is attached hereto as Exhibit 1.

4 42. Petitioners have advised the City that Petitioners have elected to prepare the record of  
5 proceedings relevant to the approval of the Project, pursuant to Public Resources Code Section  
6 21167.6. A true and correct copy of that notice is attached hereto as Exhibit 2.

7 43. Petitioners have complied with Public Resources Code Section 21167.7 by filing a copy of  
8 the original petition with the California Attorney General. A true and correct copy of the notification is  
9 attached hereto as Exhibit 3.

10 44. Petitioners have no adequate remedy at law unless the Court grants the requested relief  
11 requiring the City to set aside its approvals of the Project. In the absence of such remedy, the City's  
12 approvals will remain in effect in violation of law, and Petitioner will suffer irreparable harm because  
13 of the significant adverse impacts generated by the Project.

14  
15 **FIRST CAUSE OF ACTION**  
16 **(FAILURE TO COMPLY WITH MUNICIPAL CODE, GOVERNMENT CODE, AND SNAP)**

17 45. Petitioners incorporate by reference each of the allegations set forth in this Complaint as if set  
18 forth herein in full.

19 46. The Project is inconsistent with the Los Angeles Municipal Plan and the SNAP. SNAP is  
20 intended to “preserve the quality of existing residential neighborhoods by limiting new residential  
21 development which would exceed the prevailing density of such neighborhoods, and establish standards  
22 for new construction in such neighborhoods to conform to the existing neighborhood character.”  
23 However, wholesale demolition of seven existing residential buildings and their replacement with a single  
24 105-foot, 139-unit building, that is vastly inconsistent with the development standards and design  
25 guidelines outlined in the SNAP, is directly inconsistent with this intent.

26 47. The City improperly approved ten off-menu incentives and waivers from lot consolidation,  
27 height, setback, passageway and open space requirements. With these incentives and waivers, the Project  
28 substantially deviates from the core requirements of the SNAP development standards and design  
guidelines.

1 48. SNAP Section 7A limits lot consolidation to no more than two lots and 15,000 square feet in  
2 total. However, the Project proposes to consolidate four lots totaling to 37,688 square feet for the  
3 construction of the 131-unit apartment building, which is more than double the lot consolidation limit  
4 allowed under SNAP Section 7A.

5 49. The City improperly permitted an eight-story apartment building with a height of 105 feet,  
6 by approving an approximately 67-foot height increase, which substantially exceeds the limit in SNAP  
7 Section 7.D. SNAP Section 7.D limits new construction to no more than 15 feet taller than the shortest  
8 adjacent building, and the shortest adjacent structure is approximately 23 feet. The City approved a  
9 waiver exceeding the height limit almost three times the maximum permitted height of 38 feet.

10 50. The City also improperly approved a waiver of the open space requirement, as provided in  
11 SNAP Section 7.F and Municipal Code Section 12.21 G, to reduce the open space requirement to only  
12 3,405 square feet. The City thereby approved a 74.4% reduction of the 13,300 square feet open space  
13 requirement. Municipal Code Section 12.21 G1 asserts that the purpose of providing open space is to  
14 “afford occupants of multiple residential dwelling units opportunities for outdoor living and recreation;  
15 provide safer play areas for children as an alternative to the surrounding streets, parking areas, and  
16 alleys; improve the aesthetic quality of multiple residential dwelling units by providing relief to the  
17 massing of buildings through the use of landscape materials and reduced lot coverage; and provide a  
18 more desirable living environment for occupants of multiple residential dwelling units by increasing  
19 natural light and ventilation, improving pedestrian circulation and providing access to on-site  
20 recreation facilities.” The Project’s approval with a waiver that grossly eliminates the open space  
21 defeats this purpose.

22 51. Similarly, the City approved 55 to 70 percent rear and side yard reductions, a 72.8%  
23 passageway reduction to permit a 6-foot passageway and a 58.4% reduction of the space between  
24 buildings to permit 9-foot 2-inch width between buildings, resulting in substantial deviation from the  
25 requirements under Municipal Code Section 12.21. Such reductions also pose health and safety risks  
26 for residents as the reduction of required passageways and spaces between the buildings pose concerns  
27 with fire access and evacuation, as well as obstruction of light and air.  
28

1 52. Additionally, the Project includes removal of mature on-site trees and street trees, including  
2 protected oak and sycamore trees that are reported to be in good health. In approving the Project and  
3 the proposed removal of 17 trees, the City violated SNAP Design Guidelines Section IV-4 and the  
4 Municipal Code Sections 17.05(R) and 46.02(b). The City failed to make written finding that removal  
5 was necessary for reasonable development, or that removal of the tree would not result in an  
6 undesirable, irreversible soil erosion, in violation of the Municipal Code.

7 53. Moreover, SNAP Design Guidelines Section IV-4 mandates that “existing palm trees in the  
8 public right-of-way shall be maintained in residential areas, and are not required to be removed in  
9 order to plant new street trees.” However, the Project proposes to remove two mature King Palm and  
10 one Bottle Palm trees that are in good health.

11 **SECOND CAUSE OF ACTION**  
12 **(FAILURE TO ADOPT FINDINGS THAT ARE SUPPORTED BY EVIDENCE IN THE**  
13 **RECORD)**

14 54. Petitioners incorporate by reference each of the allegations set forth in this Petition as if set  
15 forth herein in full.

16 55. The City failed to adopt findings that are supported by substantial evidence in the record as  
17 required under CEQA and the Los Angeles Municipal Code.

18 56. The City failed to adopt findings supported by substantial evidence justifying the categorical  
19 exemption under CEQA.

20 57. The City failed to adopt findings supported by substantial evidence justifying that the  
21 requested off-menu density bonus incentives and waivers were “necessary to provide affordable housing.”  
22 Furthermore, the City failed to consider any alternatives that would reduce the need for incentives and  
23 waivers, while still producing quality residential units.

24 58. The City failed to adopt findings supported by substantial evidence justifying the removal of  
25 protected trees, in violation of the Municipal Code Sections 17.05(R) and 46.02(b), despite arborist  
26 reports showing that the mature protected trees are in good health.

27 59. The City failed to make adequate findings demonstrating compliance with SNAP’s  
28 purposes to preserve neighborhood scale, streetscape character, and existing mature trees.

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1 **THIRD CAUSE OF ACTION**  
2 **(FAILURE TO COMPLY WITH CEQA PROCEDURAL REQUIREMENTS)**

3 60. Petitioners incorporate by reference each of the allegations set forth in this Complaint as if set  
4 forth herein in full.

5 61. The City improperly approved a categorical exempt from CEQA for the Project,  
6 inconsistent with Public Resources Code 21159.21 and 21159.23, and CEQA Guidelines Sections  
7 15300.2 and 15332.

8 62. The Project will result in significant effects, including to the public health, safety, and  
9 general welfare; there is reasonable possibility that the Project would have a significant effect on the  
10 environment or the residents of the community due to unusual circumstances and cumulative impacts.

11 63. As multiple public comments noted the Project will lead to significant air quality and water  
12 quality, greenhouse gas emissions, noise, traffic and parking impacts, significant impacts associated  
13 with fire and emergency services, significant impacts on historical resources and biological resources.  
14 Comments also observed the Project will lead to significant cumulative impacts.

15 64. The Project's demolition of seven residential structures dating from 1916–1948 and its  
16 location adjacent to the Serrano Historic District present a reasonable possibility of significant  
17 historical resource impacts not analyzed under CEQA.

18 65. The City's failure to conduct a historical-resource analysis, despite evidence of residential  
19 structures with historical and architectural value within a potential historic district constitutes a  
20 violation of CEQA. Additionally, the categorical exemption under Class 32 is improper as the Project  
21 may cause a substantial adverse change in the significance of historical resources.

22 66. The City approved the Project without appropriate consideration of its environmental  
23 impacts. The City failed to conduct necessary studies or environmental review prior to the approval of  
24 the Project.

25 67. The City failed to prepare an Initial Study to determine what environmental analysis was  
26 necessary, as required by CEQA Guidelines Section 15063.

27 68. The City failed to conduct necessary studies to assess the environmental impacts of the  
28 Project, which is of significant size and scale, including impacts such as habitat loss, the destruction of  
local flora and fauna, and the depletion of natural resources.



1 76. The City failed to consider feasible mitigation measures, failed to mitigate for each  
2 environmental effect, illegally deferred mitigation, and failed to provide for effective and enforceable  
3 mitigation.

4 **FIFTH CAUSE OF ACTION**  
5 **(FAILURE TO ADOPT FEASIBLE MITIGATION MEASURES AND ALTERNATIVES**  
6 **REQUIRED BY CEQA)**

7 77. Petitioner incorporates by reference each of the allegations set forth in this Petition as if set  
8 forth herein in full.

9 78. The City failed to adopt feasible alternatives, including but not limited to, alternatives  
10 requiring less impacts that meet some or all of the Project objectives.

11 79. The City provided no consideration that alternatives that reduce the number of incentives and  
12 waivers would still produce quality residential units.

13 80. The City failed to provide consideration for alternative project designs that would not  
14 require removal of existing protected trees that are mature and in good health, and that would not lead  
15 to loss of habitat due to removal of these trees.

16 81. The City failed to adopt the environmentally superior alternative.

17 82. The City failed to adopt feasible mitigation measures, failed to mitigate for each environmental  
18 effect, illegally deferred mitigation, and failed to provide for effective and enforceable mitigation.

19 **PRAYER FOR RELIEF**

20 **WHEREFORE**, Petitioners pray for relief as follows:

21 A. For a temporary restraining order, preliminary injunction and/or permanent injunction  
22 enjoining the City from taking any steps to further the Project until lawful approval is obtained from the  
23 City after the preparation and consideration of adequate environmental analysis, with adequate notice to  
24 and opportunity to participate for interested parties, compliance with Municipal Code and SNAP  
25 requirements, and adoption of findings supported by substantial evidence;

26 B. For alternative and peremptory writs of mandate, vacating approval of all aspects of the  
27 Project, and enjoining the City from taking any steps to further the Project until lawful approval is  
28 obtained from the City after the preparation and consideration of adequate environmental analysis, with  
adequate notice to interested parties, compliance with requirements of the Municipal Plan, SNAP and

1 associated development standards and guidelines, and adoption of findings supported by substantial  
2 evidence;

3 C. For declaratory relief that the City has violated its Municipal Code, SNAP, and CEQA;

4 D. For costs of suit;

5 E. For reasonable attorneys' fees; and

6 F. For such other and further relief as the Court deems just and proper.

7 DATED: October 27, 2025

Respectfully Submitted,

8 **DELANO & DELANO**

9  
10 By:   
11 \_\_\_\_\_  
12 Ezgi Kuyumcu  
13 Attorneys for Petitioner  
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1 **VERIFICATION**

2 I have read the foregoing Verified Petition for Writ of Mandate and know its contents.

3  
4 .. I am a party to this action. The matters stated in it are true of my own knowledge  
5 except as to those matters which are stated on information and belief, and as to those  
6 matters I believe them to be true.

7  
8 X I am an officer of George Abrahams Foundation, a party to this action, and am  
9 authorized to make this verification for and on its behalf, and I make this verification  
10 for that reason. I have read the foregoing document(s). I am informed and believe  
11 and on that ground allege that the matters stated in it are true.

12  
13 .. I am one of the attorneys for \_\_\_\_\_ a party to this action. Such party is absent  
14 from the County Los Angeles, California, where such attorneys have their offices, and  
15 I make this verification for and on behalf of that party for that reason. I have read the  
16 foregoing document(s). I am informed and believe that on that ground allege that the  
17 matters stated in it are true.

18  
19 Executed on October 27, 2025 at Los Angeles, California.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and  
21 correct.

22   
23 \_\_\_\_\_  
24 Jennifer Getz

## **EXHIBIT 1**



# DELANO & DELANO

October 27, 2025

City Clerk  
City of Los Angeles  
200 North Spring Street  
City Hall – Rom 395  
Los Angeles, CA 90012

Re: Notice of Intention to Commence Action Under the California Environmental Quality Act

Dear City Clerk,

Please take notice that the George Abrahams Foundation and the Carlton Serrano Tenants Association (“Petitioners”) intend to commence an action in the California Superior Court, alleging, among other things, violations of the California Environmental Quality Act (“CEQA”) against the City of Los Angeles to challenge approvals of West Carlton Way Project located at 5416–5418, 5420, 5425, 5425–5428, and 5430 Carlton Way (“Project”), including the City's determination of a CEQA exemption and approval of Off-Menu Incentives and Waivers of Development Standards for the development, maintenance and use of a 139-unit apartment complex without adequate environmental analysis. Among other things, the petition will seek to vacate the approvals of the Project and to enjoin the City from taking any further steps to implement those approvals.

If the City would like to discuss these concerns and their possible resolution, please contact the undersigned immediately. Thank you for your attention to this matter.

Sincerely,

  
Ezgi Kuyumcu

## **EXHIBIT 2**

1 Everett L. DeLano, III (Calif. Bar No.  
2 162608) Ezgi Kuyumcu (Calif. Bar No.  
3 353069) **DELANO & DELANO**  
4 104 West Grand Avenue  
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7 Email: everett@delanoanddelano.com  
8 ezgi@delanoanddelano.com  
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10 Attorneys for Petitioners  
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12  
13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF LOS ANGELES**  
15

16 GEORGE ABRAHAMAS FOUNDATION, a non-  
17 profit corporation; CARLTON SERRANO  
18 TENANTS ASSOCIATION, an unincorporated  
19 association;

20 Petitioners,

21 vs.

22 CITY OF LOS ANGELES, a public body  
23 corporate and politic, and DOES 1 through 10,  
24 inclusive;

25 Respondents,

26 MARIA FLORES, an individual, and 5430  
27 CARLTON LLC, a limited liability company,  
28 and DOES 11 through 20, inclusive

Real Parties in Interest.

) Case No.

) **NOTICE OF ELECTION TO PREPARE  
RECORD**

) (California Environmental Quality Act)

1 By this notice, Petitioner gives notice that Petitioner elects to prepare the administrative record  
2 in the above-entitled action.

3 **DATED:** October 27, 2025

4 Respectfully Submitted,  
5 **DELANO & DELANO**

6 By: /s/Ezgi Kuyumcu \_\_\_\_\_

7 Ezgi Kuyumcu  
8 Attorneys for Petitioners  
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## **EXHIBIT 3**

1 **PROOF OF SERVICE**

2 *George Abrahams Foundation & Carlton Serrano Tenants Association v. City of Los Angeles*

3 I, the undersigned, declare:

- 4 1. I am over the age of 18 years and not a party to this action. I am employed in the County of San Diego, California, in which county the within mentioned service occurred. My business address is 104 W. Grand Avenue, Suite A, Escondido CA 92025.
- 5 2. I am familiar with this office's normal business practice for collection and processing of correspondence for mailing with the U.S. Postal Service. That practice is to deposit correspondence with the U.S. Postal Service the same day as the day of collection in the ordinary course of business.
- 6 3. On October 27, 2025, I served a copy of **VERIFIED PETITION FOR WRIT OF MANDATE and COMPLAINT** to the following by the following means:

9 CEQA Coordinator  
 10 Office of the Attorney General  
 Environment Section  
 11 1300 "I" Street  
 Sacramento, CA 95814-2919

Electronic Service/ Email  
 CEQA@doj.ca.gov.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated this October 27, 2025 at Escondido, California,

14 s//Ivy Harris

15 \_\_\_\_\_  
16 Ivy Harris