

03/07/2024

CENTRAL DISTRICT OF CALIFORNIA

BY: _____ kdu _____ DEPUTY

Stipulated Facts re: RFQ Agreement (3/15/23)

1. LA Alliance, represented by Elizabeth Mitchell and Daniel Conway, met with the City (represented by Scott Marcus, David Michaelson, and Mercedes Marquez) on March 8 and again March 15, 2023 to discuss the City's non-compliance with the Agreement. On March 15, 2023, the City—through then-Chief Housing and Homelessness Officer Mercedes Marquez—claimed that the City had significant plans intended to come into compliance with Section 5.2(ii) and (iv). Specifically, Marquez stated that the City had already put out an RFQ (Request For Quote or Request for Qualification) for service/outreach providers, would be “fully staffed” with an assigned service/outreach provider for each district by July 1, 2023, and would “have each district fully assessed” (which was described as identifying the numbers of unsheltered PEH, plus a description of the needs of various groups, including an estimate of the number of individuals with serious mental illness and substance use disorder, in each district) by September 30, 2023. Ms. Marquez promised that once that effort was complete, the City would then provide the Alliance its proposed encampment milestones and deadlines by October 1, 2023.

2. Elizabeth Mitchell summarized the meeting in an email thereafter, directed to Scott Marcus, Mercedes Marquez, and David Michaelson:

In our last meeting we talked about the RFQ that the City has put out for a list of qualified service/outreach providers, and that the City expects to be fully staffed with the District's chosen providers by July 1 We also discussed that the City could commit to having each district fully assessed and get us a list of proposed milestones and deadlines within 3 months thereafter (October 1).

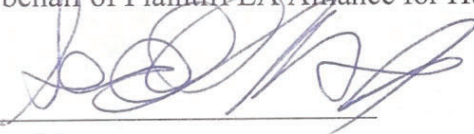
3. Relying upon the promises of the new mayor's representative, and extending a good faith opportunity to a new administration, LA Alliance agreed to the extension. Mr. Marcus, on behalf of the City, confirmed the request for extension and agreed the City would provide district-specific encampment milestones by October 1, 2023.

4. The City did not complete the RFQ process as represented to LA Alliance, and did not have each district fully assessed to help establish appropriate milestones as the City had committed to on March 15, 2023. Two days after October 1, the City emailed its "Encampment Engagement, Cleaning, and Resolution" proposal ... that contained no proposed district by district deadlines or milestones at all.

So stipulated:



Elizabeth Mitchell,
on behalf of Plaintiff LA Alliance for Human Rights



Scott Marcus,
on behalf of Defendant City of Los Angeles