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18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20 LA ALLIANCE FOR HUMAN
21 RIGHTS, et al.,
22 Plaintiffs,
23 v.
24 CITY OF LOS ANGELES, et al.,
25 Defendants.
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CASE NO. 2:20-cv-02291 DOC (KES)
**DECLARATION OF CHERI
TODOROFF**

Assigned to the Hon. David O. Carter
and Magistrate Judge Karen E. Scott

DECLARATION OF CHERI TODOROFF

I, Cheri Todoroff, declare as follows:

1. I am the Executive Director of the County Homeless Initiative, a party in the above-entitled action. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration as requested by the Court during the April 4, 2024 status conference.

2. The 921 new mental health and substance-use disorder (“SUD”) beds are in addition to and do not overlap with the beds related to *Rutherford v. Luna*, Case No. 2:75-CV-0411-DDP.

3. There is no presumption that any County vendor or contractor can obtain payment without complying with the terms of their County contract, including services and compensation/funding, invoicing, accounting, certification, and record-maintenance obligations.

4. The County takes significant efforts to ensure accurate payments for beds and services and to avoid double payments.

5. Because mental health/SUD beds require a referral and/or authorization of admission, patients are tracked and invoices are compared to authorizations.

6. The County and the departments that provide mental health and SUD services have existing systems of oversight, quality improvement and compliance processes, and other checks and balances.

7. For example, departments are responsible for monitoring their contractors and tracking and reporting poorly performing contractors in the Contractor Alert Reporting Database (CARD) and to other County departments.

8. The County is committed to maintaining these internal controls and ensuring that County contractors are held accountable for providing the services promised under their contracts with all County Departments, including those Departments that provide the mental health and SUD beds and other supportive

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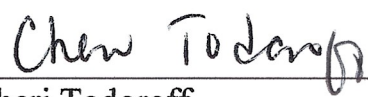
services in connection with this action.

9. The County has made a website for provider invoices, which is available at the following url: <https://data.lacounty.gov/apps/lacounty::alliance-settlement-program/>

10. Users may also navigate to this page from the “Featured Stories” section the County’s Open Data portal, <https://data.lacounty.gov>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 4th day of April, 2024, at Los Angeles, California.


Cheri Todoroff