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Superior Court of California,  
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David W. Slayton,  
Executive Officer/Clerk of Court,  
By S. Ruiz, Deputy Clerk

5 Catherine (“Kath”) Rogers, SBN 315607  
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7 AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
8 OF SOUTHERN CALIFORNIA, INC.  
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12 Attorneys for Petitioner

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

13 THE AMERICAN CIVIL LIBERTIES  
14 UNION OF SOUTHERN CALIFORNIA,

15 PETITIONER,

16 v.

17 HOUSING AUTHORITY FOR THE CITY  
18 OF LOS ANGELES,

19 RESPONDENT.

20 Case No. **26STCP00168**

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**VERIFIED COMPLAINT AND PETITION  
FOR DECLARATORY RELIEF AND  
WRIT OF MANDATE TO ENFORCE THE  
CALIFORNIA PUBLIC RECORDS ACT**

[Gov. Code, §§ 7920.000, *et seq.*;  
Code Civ. Proc., §§ 1085, *et seq.*]

## **INTRODUCTION**

1. We all deserve a safe, stable, and affordable place to call home. The Housing Choice Voucher (“HCV” or “housing voucher”) program is the federal government’s primary policy tool for achieving this goal.

2. However, as evidenced by tens of thousands of people living on California's streets, our state and nation are falling short. Currently, only one in four households that are eligible for housing vouchers receive them. This means that 75% of qualified individuals and families, including people with disabilities and older adults, are still struggling to afford housing, precariously housed, or living on the street. This dire shortage of housing vouchers leads to long waiting lists that are often closed to new applicants and waiting times for those who receive a voucher can stretch over 10 years.

3. In Los Angeles, the Housing Choice Voucher program and its waiting list is administered by the Housing Authority for the City of Los Angeles (“HACLA” or the “Agency”).

4. To increase public transparency and investigate policy concerns with implementation of the Housing Choice Voucher program in Los Angeles, the American Civil Liberties Union of Southern California (“ACLU SoCal”) submitted a request to HACLA under the California Public Records Act (“PRA”) in October of 2023 regarding the waiting lists for housing vouchers distributed by the Agency. ACLU SoCal submitted this request as part of a larger inquiry into the implementation of the Housing Choice Voucher program in different jurisdictions across California.

5. The PRA guarantees public access to the records of government agencies as “a fundamental and necessary right of every person in this state.” Gov. Code § 7921.000. The Legislature enacted the PRA “for the purpose of increasing freedom of information by giving members of the public access to records in the possession of state and local agencies.” *Nat'l Lawyers Guild v. City of Hayward*, 9 Cal. 5th 488, 492 (2020) (quotation omitted). In 2004, Californians enshrined the right of public access in the State’s constitution, providing, “The people have the right of access to information concerning the conduct of the people’s business, and, therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny,” Cal. Const., art. I, § 3(b)(1), and expressly mandating compliance with the PRA, *id.* § 3(b)(1), (7).

6. For advocacy organizations like ACLU SoCal, the PRA provides a crucial means to

analyze and bring public attention to critical government programs like the Housing Choice Voucher program.

7. Petitioner ACLU SoCal requested a limited and clearly identified set of records related to the waiting list for public housing vouchers from HACLA on October 5, 2023. HACLA staff sent an email response to the request shortly thereafter, acknowledging the Agency had responsive documents and stating that it would need more than the 10 days to respond, and that “we will be in contact with you as soon as possible.”

8. When a year passed after the initial request with no further communication from HACLA, ACLU SoCal resubmitted its PRA request on October 28, 2024. After about six weeks with no reply, ACLU SoCal’s attorney wrote to the Agency highlighting HACLA’s failure to respond. The next day, a HACLA staff member sent several responsive records – all of which were already available on HACLA’s public-facing website – and promised that for the “individualized data for the remainder of your request” they would “discuss with our team and … provide an estimated delivery date next week.” HACLA staff never again produced any responsive records. ACLU SoCal followed up five times in the following months, and ACLU SoCal’s attorney sent a follow-up email to the Agency’s general counsel detailing its utter failure to respond in August 2025. None of these communications received any substantive reply, and the Agency to date has neither produced the records nor provided any justification for failing to do so.

9. ACLU SoCal therefore petitions this Court for declaratory relief and a writ of mandate requiring HACLA to promptly provide responsive records as required under the PRA, Gov. Code § 7920.000 *et seq.* ACLU SoCal also seeks issuance of a writ under those provisions of the California Constitution securing public access to government documents and records. *See* Cal. Const., art. I § 3(b)(1).

## **PARTIES**

10. Petitioner AMERICAN CIVIL LIBERTIES UNION OF SOUTHERN CALIFORNIA (“ACLU SoCal”) is a non-profit public interest organization under the laws of the state of California. ACLU SoCal is an affiliate of the national American Civil Liberties Union, a nonprofit, nonpartisan civil liberties organization with more than 4 million members, activists, and supporters nationwide

1 dedicated to the principles of liberty and equality embodied in our civil rights laws. ACLU SoCal  
2 defends the fundamental rights outlined in the United States Constitution, California Constitution, and  
3 the Bill of Rights. It is also committed to principles of transparency and accountability and seeks to  
4 ensure that the public is informed about the conduct of governmental officials. As part of its advocacy,  
5 ACLU SoCal relies on public records to gather information and ensure that the public is informed about  
6 the conduct and practices of local, state, and federal officials. ACLU SoCal routinely uses information  
7 from public records to support civil rights litigation, publish reports, advance public policy initiatives,  
8 and work with the press and the public at large to promote participation in civil affairs. ACLU SoCal is  
9 a member of the public with the right to inspect and receive public records and enforce a request for  
10 records under the PRA. (§§ 7920.515-7920.520, 7923.000.)

11 11. Respondent HACLA is a State-chartered public agency and public housing authority.  
12 Accordingly, it is a “public agency” within the meaning of Gov. Code § 7920.525(a).

### **JURISDICTION AND VENUE**

14 12. This Court has jurisdiction under California Government Code §§ 7923.000 and  
15 7923.100, Code of Civil Procedure § 1085, and Cal. Const. art. VI, §10.

16 13. Venue is proper in this Court because Respondent, the acts and omissions complained of  
17 herein, and the records in question, or some portion of them, are situated in the County of Los Angeles.  
18 See Gov. Code § 7923.100; Code Civ. Proc. §§ 393, 394(a), 395(a).

### **FACTUAL ALLEGATIONS**

#### **A. Background: The Housing Choice Voucher Program**

21 14. The federal government’s Housing Choice Voucher program provides rental assistance  
22 to support low-income families and individuals, with the goal of ensuring access to housing that is safe  
23 and healthy regardless of one’s income. It is a highly effective antipoverty strategy that reduces the  
24 number of people who are unhoused, decreases housing instability, and improves outcomes for families  
25 and children. Housing vouchers also help to reduce extreme poverty and racial inequity.

26 15. If all eligible households had access to housing vouchers, low-income families would be  
27 guaranteed affordable housing, and no one would be forced to live on the street due to an inability to  
28 pay market rent. However, as evidenced by tens of thousands of people living on California’s streets,

1 our state and nation are far from meeting this goal.

2       16. Policy decisions over the past 50 years have helped to create today's housing crisis. This  
3 includes the federal government's drastic cuts to affordable housing funding in the 1980's, which  
4 corresponded with a tripling of the number of unhoused people. The federal administration now aims to  
5 further cut housing funding, which will force more Americans to live on the street.

6       17. Due to generations of discrimination in housing policy, Black Californians face a  
7 far higher risk of becoming unhoused and experiencing housing precarity. As such, Black Californians  
8 face increased harm by lack of access to housing vouchers. For example, in Los Angeles Black  
9 residents represent 8.3% of the City's population but 52% of all voucher-holding households.

10       18. Currently, only one in four households that are eligible for housing vouchers receive  
11 them. This means that 75% of qualified individuals and families, including people with disabilities and  
12 older adults, are still struggling to afford housing, precariously housed, or living on the street.

13       19. This dire shortage of housing vouchers leads to long waiting lists that are often closed to  
14 new applicants and waiting times for those who receive a voucher can stretch over 10 years. In Los  
15 Angeles, HACLA administers this waiting list.

16       **B. HACLA's Implementation of the Housing Choice Voucher program**

17       20. HACLA is the public housing agency that administers Section 8 tenant-based housing  
18 assistance to residents of the City of Los Angeles on behalf of the U.S. Department of Housing and  
19 Urban Development ("HUD").<sup>1</sup> As such, HACLA maintains a system for distributing housing vouchers  
20 to eligible families and individuals in the City who have applied through the Agency. HACLA allows  
21 applications during limited time windows, and then the Agency conducts a "lottery" to determine which  
22 applicants will be placed onto the "waiting list" for the vouchers.<sup>2</sup>

23       21. At times, HACLA's application period for Section 8 housing vouchers has been closed  
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26       <sup>1</sup> "Section 8" refers to 42 U.S.C. § 1437f (section 8 of the Housing Act of 1937), which authorizes the  
27 federal government to provide rental assistance through the Housing Choice Voucher program.

28       <sup>2</sup> See e.g. HACLA's Section 8 Waiting List announcement for the open application period from  
October 17, 2022 to October 30, 2022, listed on its website here:

<https://www.hacla.org/sites/default/files/Documents/HACLA%20WL%20Public%20Notice%20COLOR%20BW%2009302022.pdf>

1 for periods of more than a decade.<sup>3</sup> This means that individuals and families who apply for Section 8 in  
2 Los Angeles have a strong interest in ensuring that their application is processed correctly, since they  
3 might not have another opportunity to apply for many years.

4 **C. Petitioner's Public Records Requests to HACLA**

5 22. On October 5, 2023, Eve Garrow, Senior Policy Analyst & Advocate for ACLU SoCal,  
6 sent a California Public Records Act request to Kevin Wong, Records Management Specialist for  
7 HACLA, by email. Ms. Garrow's record request included six categories of records related to HACLA's  
8 housing voucher waiting list, with limitations by date and specificity as to the types of records she  
9 requested. She provided her phone number and email address for HACLA to contact her in case of any  
10 questions. A true and correct copy of the request is attached as Exhibit A ("October 2023 Request").

11 23. On October 11, 2023, HACLA staff member Kevin Wong responded by email to Ms.  
12 Garrow, stating:

13 "...the Housing Authority of the City of Los Angeles (HACLA) has received your request for  
14 information relating to Housing Choice Voucher Waiting List. The Housing Authority of the  
15 City of Los Angeles is engaged in locating the records requested. However, because the records  
16 are located in various locations and the time needed to locate them will require an extension of  
17 the 10 day period under California Public Records Act §6253. Therefore, we will be in contact  
18 with you as soon as possible..."

19 A true and correct copy of the email is attached as Exhibit B.

20 24. Ms. Garrow never received any follow-up correspondence to this records request, nor  
21 did she receive any responsive records.

22 25. More than a year later, on October 28, 2024, after not having received a response to her  
23 initial request, Ms. Garrow resubmitted an updated version of her California Public Records Act  
24 Request via email to Kevin Wong. A true and correct copy of the updated request is attached as  
25 Exhibit C ("Updated Request," and collectively with the October 2023 request, the "Request"). In the  
26 email to which the Updated Request was attached, Ms. Garrow stated:

27 "Dear Kevin Wong, I am responding to our last correspondence on a California PRA request I  
28 submitted about a year ago. As I have not received any responsive records to date, I am  
resubmitting an updated request, attached. Please consider the attached letter as a new, updated

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<sup>3</sup> See e.g. HACLA's October 2, 2017 notice of the first open application period in 13 years for the Agency's waiting list lottery, available at: <https://www.hacla.org/en/news/section-8-housing-choice-voucher-waiting-list-lottery-open-monday>

1 request from the ACLU of Southern California and disregard the letter from last year dated  
2 10/5/23. Feel free to contact me with any questions or needed clarifications.”

2 A true and correct copy of the cover email is attached as Exhibit D.

3 26. When Ms. Garrow had not heard back from HACLA about the Updated Request for  
4 over a month, on December 11, 2024, Ms. Garrow’s attorney, Kath Rogers, sent an email to Kevin  
5 Wong, copying Ms. Garrow, HACLA employee Mariela Osorio, and HACLA general counsel James  
6 Johnson. The email described the Agency’s failure to respond to both of Ms. Garrow’s records  
7 requests, put the Agency on notice of its legal obligation to respond, and offered to answer any  
8 questions needed to clarify the Request. A true and correct copy of Ms. Rogers’ email is attached as  
9 Exhibit E.

10 27. The following day, December 12, 2024, HACLA employee Maria Cabrera sent an email  
11 to Eve Garrow attaching partial responsive records, all of which were already available on HACLA’s  
12 website. She stated:

13 “...I am attaching some documents here that will answer most of the points under item #1 and  
14 #2. Unfortunately I can not create a document to answer your questions but only provide the  
15 available records. Therefore I'm attaching several documents that contain the information you  
16 are looking for. For the individualized data for the remainder of your request I will discuss with  
17 our team and we will provide an estimated delivery date next week. If you have any questions  
18 about the documents attached or want to get on the phone to discuss where to find the specific  
19 data listed in your request please feel free to give me a call. Best Regards, Maria Cabrera”

20 A true and correct copy of an email thread that begins with Ms. Cabrera’s December 12 email is  
21 attached as Exhibit F.

22 28. Despite Ms. Cabrera’s promise to provide an estimated delivery date for the records the  
23 next week, she did not do so. More than two months passed, and Ms. Cabrera did not follow up. So, on  
24 February 14, 2025, Ms. Garrow sent Ms. Cabrera a follow-up email asking again about a timeline for  
25 responsive records:

26 “Dear Maria, Thank you so much for the responsive records to date. They are very helpful! In  
27 terms of the individualized data, in the below correspondence you stated that you would provide  
28 the estimated delivery date the week of December 16. Can you please provide that date for me?  
I’m happy to jump on a call if there is anything I can do to clarify the request. Other PHAs have  
provided the individualized data in spreadsheet format.”

28 Exhibit F.

29. On February 20, 2025, Ms. Cabera responded by email to Eve Garrow as follows:

1       “Good Morning Eve, Thank you for your follow up, I wish I had more tangible updates for you  
2 but unfortunately I do not. The information you requested is not something we have readily  
3 available it has to be extracted from our database and only limited staff can do that. I have  
4 bumped this up to my supervisor and we are scheduled to meet on Tuesday (2/25) to discuss and  
hopefully resolve this request. I ask for your patience for one more week so I can provide a  
better update (or if all goes well the records). Best, Maria”

5 Exhibit F.

6       30.      Despite asking for a one-week extension, Ms. Cabrera never communicated with Ms.  
7 Garrow again or responded to any further emails. Ms. Garrow sent three follow-up emails to Ms.  
8 Cabrera on May 6, 2025; June 2, 2025; and July 18, 2025. True and correct copies of these emails are  
9 attached as Exhibits G, H, and I, respectively. Ms. Garrow did not receive responses to any of those  
10 emails from Ms. Cabrera or anyone else at HACLA.

11       31.      On August 28, 2025, Ms. Rogers sent another email on behalf of Ms. Garrow to  
12 HACLA’s general counsel James Johnson, with a copy sent to HACLA employees Kevin Wong and  
13 Maria Osorio, as well as to Eve Garrow. The email described HACLA’s failure to comply with the  
14 PRA, explained that HACLA’s staff had “stopped responding altogether and failed to produce most of  
15 the responsive records.” It further stated, “[t]he goal of this email is to provide a final opportunity for  
16 HACLA to comply with the law by producing these responsive records no later than October 10, 2025.  
17 If HACLA does not fulfill its obligations under the PRA related to this request, we will be forced to  
18 consider legal escalation.” A true and correct copy of a thread with Ms. Rogers’ email and Mr.  
19 Johnson’s response is attached as Exhibit J.

20       32.      The following day, August 29, 2025, general counsel James Johnson sent the following  
21 email response: “Good morning. I appreciate you following up. My colleagues Ajay and Kevin will  
22 look into this and get back to you. Thank you. James.” Kevin Wong, Mariela Osoria, and Eve Garrow  
23 were copied on the email. Exhibit J.

24       33.      Following Mr. Johnson’s email of August 29, 2025, no one from HACLA  
25 communicated further with Ms. Garrow or Ms. Rogers, nor followed up in any way, nor has HACLA  
26 produced the responsive records, as of the filing of this action in January 2026.

27       34.      To date, more than two years have passed since Ms. Garrow’s initial October 2023  
28 Request for records to HACLA. Only after Ms. Garrow’s attorney contacted HACLA more than a year

1 after her initial request did HACLA produce some documents that were already available on their  
2 public website. HACLA acknowledged it had not responded to the bulk of Ms. Garrow's Request and  
3 that it had the responsive documents in its possession. HACLA has also promised to provide estimated  
4 delivery dates on multiple occasions. But HACLA has failed to produce records that it is legally  
5 required to produce, and its staff have effectively stopped responding to Ms. Garrow altogether about  
6 the Request.

7 **D. Other Public Housing Agencies Have Responded to Petitioner's Requests**

8 35. As part of its investigation into Housing Choice Voucher program, ACLU SoCal  
9 requested the same type of records on housing voucher waiting lists from multiple other public housing  
10 authorities in other regions of the state.

11 36. Unlike HACLA, other housing authorities to which ACLU SoCal sent the same request  
12 have produced these records. These housing authorities include: the Los Angeles County Development  
13 Authority (LACDA); Oakland Housing Authority; Orange County Housing Authority; Housing  
14 Authority of the County of San Bernardino; San Francisco Housing Authority; and Housing Authority  
15 of Tulare County. These housing authorities were able to provide records reflecting the individuals who  
16 applied for housing voucher waiting lists – including data such as how many days each individual  
17 waited on the list; whether a particular individual ultimately received a voucher; and whether an  
18 individual was dropped from the list; and the reason for dropping an individual from the list, if  
19 applicable.

20 37. The records ACLU SoCal received from other public housing authorities across  
21 California confirmed the importance of this investigation. They revealed that other public housing  
22 authorities have dropped up to 90% of households from their waiting lists without offering them  
23 vouchers, mostly because of failures in the agencies' attempts to contact the applicants.

24 38. There is a strong public interest in the disclosure of records related to the waiting lists  
25 for public housing vouchers. These waiting lists have a major impact on individuals and families  
26 throughout the state, and these records have the potential to inform policy proposals aimed at ensuring  
27 that the expectation of receiving a housing voucher once on a waiting list is not a broken promise.

28 39. The records requested from HACLA are critical to the integrity of ACLU SoCal's study

1 on public housing voucher waiting lists, since Los Angeles City is the epicenter of the state's housing  
2 crisis. The City is home to 38% of all unhoused Californians, and HACLA manages the most HCVs of  
3 any housing authority in California. The absence of HACLA data would create a significant gap in the  
4 public's understanding of public housing operations and the outcomes for Californians in line to receive  
5 subsidized housing.

6 **CAUSE OF ACTION**

7 **FIRST CAUSE OF ACTION**

8 **For Writ of Mandate for Violation of Gov. Code § 7920 *et seq.***  
**(by Petitioner against Respondent)**

9 40. Petitioner incorporates the foregoing and subsequent paragraphs as though fully set forth  
10 herein.

11 41. Under the PRA, ACLU SoCal has the right to request and inspect the public records  
12 sought in the Request, and HACLA has the legal duty to provide responsive records subject to  
13 disclosure promptly and without delay.

14 42. ACLU SoCal submitted two requests for a limited and identifiable set of records on  
15 October 5, 2023, and again on October 28, 2024.

16 43. More than two years after the October 2023 Request, HACLA has produced several  
17 records that were already available on its public website. It has acknowledged that it has not responded  
18 to the bulk of the records request and that the Agency has responsive records in its possession. HACLA  
19 has provided no indication of any grounds to withhold any document as exempt from disclosure.

20 44. HACLA staff initially stated that they would provide estimated dates for production of  
21 the responsive records. However, despite more than two years having passed since the initial October  
22 2023 Request, HACLA has failed to produce the bulk of the responsive documents and has completely  
23 stopped responding to follow up emails about the request. HACLA has not provided any explanation  
24 for its delay or its failure to produce the records.

25 45. Under Government Code § 7922.535(a), HACLA had a duty to determine whether the  
26 records responsive to the Request were disclosable and to notify ACLU SoCal within ten days of the  
27 request, to be extended to no more than fourteen days in the event of “unusual circumstances” upon  
28 notification to ACLU SoCal in writing of the existence of such circumstances. Any such records  
deemed to be disclosable should have been made “promptly” available. Gov. Code § 7922.535(a).

46. HACLA has failed to provide all nonexempt documents responsive to ACLU SoCal's Request. HACLA cannot demonstrate that the outstanding responsive records are exempt from disclosure under the PRA or any other authority.

47. To the extent that HACLA may now assert, for the first time, that it is withholding any records based on a claimed exemption, HACLA has failed to identify that exemption or provide required information regarding its decision to withhold responsive records. Gov. Code §§ 7922.605, 7922.540.

48. In the nearly a year since Ms. Cabrera’s email of February 20, 2025, stating that HACLA had documents in its possession and that she would provide an update the following week, HACLA has provided no substantive responses to ACLU SoCal about the status of the Request. HACLA failed to respond in any way to multiple emails from Ms. Garrow asking about the status of the request. In the few instances in which staff have replied, they have done so with non-substantive responses that provide no information, simply asserting that they are working on the request or that they will provide an update soon. HACLA has consistently failed to meet and confer as to the Request as required by the PRA. Gov. Code § 7922.600(a).

49. HACLA's failure to provide documents responsive to the Request violates its obligations under the PRA to produce all records responsive to ACLU SoCal's request and its duty to adhere to the PRA as required by Article I, § 3 of the California Constitution.

50. Issuance of a writ of mandate compelling HACLA to perform its duties under the PRA is required because there exists no plain, speedy, and adequate remedy in the ordinary course of law which would protect ACLU SoCal's rights and interests.

## **PRAYER FOR RELIEF**

**WHEREFORE**, Petitioner prays as follows:

1. That the Court issue a peremptory writ of mandate directing Respondent to immediately provide Petitioner with all non-exempt requested public records in its possession;
2. For a declaration that the conduct of the Housing Authority of the City of Los Angeles has violated the PRA in failing to timely disclose all non-exempt, requested public records in its possession, failing to timely and properly respond to public records

1 requests, and failing to meet and confer with Petitioner on its Request;

2 3. For an injunction requiring the Housing Authority of the City of Los Angeles to produce

3 all disclosable records forthwith;

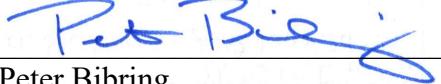
4 4. That Petitioner be awarded attorneys' fees and costs; and

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

6  
7 Dated: January 12, 2026

Respectfully submitted,

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LAW OFFICE OF PETER BIBRING

By:   
Peter Bibring

Attorney for Petitioner American Civil Liberties  
Union of Southern California

## **VERIFICATION**

I, Eve Garrow, am a Senior Policy Analyst & Advocate for the American Civil Liberties Union of Southern California (“ACLU SoCal”), Petitioner in this action.

I have read the foregoing **VERIFIED COMPLAINT AND PETITION FOR DECLARATORY RELIEF AND WRIT OF MANDATE TO ENFORCE THE CALIFORNIA PUBLIC RECORDS ACT** and know the contents thereof. The facts as alleged therein are true to the best of my knowledge, except as to those matters alleged on information and belief, and as to those matters, I believe them to be true. I have authorization to verify such facts on behalf of ACLU SoCal.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on the 12th day of January, 2026, in Riverside, California.

Eve Garrow  
Eve Garrow  
ACLU SoCal

# Exhibit A



October 5, 2023

*By email: kevin.wong@hacla.org*

Kevin Wong, Records Management Specialist  
Housing Authority of the City of Los Angeles (HACLA)  
2600 Wilshire Blvd.  
Los Angeles, CA 90057  
213-252-5497

RE: Records regarding HACLA's Housing Choice Voucher waiting list

To: Kevin Wong, Records Management Specialist:

I request records regarding HACLA's Housing Choice Voucher (HCV) waiting list. This request is made pursuant to the California Public Records Act, Government Code §6250, et seq. and the California Constitution, as amended by passage of Prop. 59 on November 3, 2004.

Please produce records, data, and information regarding the HACLA HCV waiting list as of the date of this letter. I request the following records, data, and information:

1. For the HACLA HCV waiting list lottery application periods in 2017 and 2022:
  - a. The dates the waiting list lottery application periods opened and closed;
  - b. The number of applications received during each lottery application period;
  - c. The number of applicants entered onto the waiting list as a result of each lottery application period;
  - d. Any priority categories in effect for applicants entering the waiting list, and the number of applicants in each of these categories.
2. For applicants on the waiting list who entered the waiting list anytime other than the waiting list lottery application periods in 2017 and 2022, please provide:
  - a. The total number of applicants placed on the waitlist;
  - b. Any priority categories in effect for applicants entering the waiting list, and the number of applicants in each of these categories.
3. For each applicant active on the waiting list as of the date of this letter, please provide individual-level records, data, and information, anonymized if required, indicating:

- a. The date the applicant was placed on the waiting list;
- b. The priority category or categories to which the applicant has been assigned (i.e., a category such as “homeless–waiting list limited preference”) that prioritize the applicant on the waiting list for a HCV, if any.

4. For each applicant placed on the waiting list between January 1, 2012 and the date of this letter that has been removed from the waiting list, please provide individual-level records, anonymized if required, indicating:
  - a. The date the applicant was placed on the waiting list;
  - b. The date the applicant was removed from the waiting list;
  - c. The reason the applicant was removed from the waiting list, including but not limited to:
    - i. The applicant received a HCV and is searching for a rental unit;
    - ii. The applicant became a “new admission” (i.e., the applicant received a HCV and “leased up”);
    - iii. The applicant was found to be ineligible because they no longer qualify for the HCV program;
    - iv. The applicant did not respond to the selection notification letter or otherwise could not be located.
  - d. For new admissions, whether the new applicant belonged to a priority category, such as “homeless–waiting list limited preference,” and if so, which category.
5. For each applicant who received an HCV between January 1, 2012 and the date of this letter that was not pulled from the HCV master waitlist, including but not limited to applicants referred for special purpose vouchers, please produce individual-level records and data anonymized if required, on:
  - a. The date the applicant was referred to HACLA;
  - b. The type of voucher for which they were referred, including but not limited to mainstream HCV (core program), special purpose voucher for non-elderly disabled, mainstream, HUD-VASH, project-based, waiting list limited preference–Homeless, waiting list limited preference–LAUSD, and waiting list limited preference–tenant based supportive housing;
  - c. The referring department or program (if any), including but not limited to the Department of Children and Family Services, Veterans Affairs, the Department of Health Services, and the Department of Mental Health through the Coordinated Entry System;
  - d. Whether the applicant has an HCV but has not yet “leased up” as of the date of this letter;
  - e. The date the applicant became a “new admission” (i.e., the applicant received an HCV and “leased up”), if any.

6. For all new admissions to the Housing Choice Voucher program from January 1, 2012 to the date of this letter, please provide:
  - a. Copies of all U.S. Department of Housing and Urban Development Family Report Forms (Form 50058), redacted to remove identifying information if required.
  - b. Any available records indicating whether the new admission belongs to a priority category, and if so, which category.

The California Public Records Act requires a response within 10 days of your receipt of this request. Please let me know within 10 days whether you have disclosable records and, if so, the estimated date for disclosure.

If records are maintained in electronic format, please provide them in that same format to retain metadata and avoid copying costs. Because the ACLU SoCal is a nonprofit civil rights organization, we request that you waive any fees that would be normally applicable to a Public Records Act request. *See N. County Parents Org. v. Dep't of Educ.*, 23 Cal. App. 4th 144, 146 (1994). However, should you be unable to do so, the ACLU SoCal will reimburse your agency for the “direct costs” of copying these records (if your agency elects to charge for copying) plus postage. *See Cal. Gov't Code § 6253(b)* (only “direct costs of duplication” can be charged to the requesting party). If you anticipate that these costs will exceed \$100, please notify me of the cost prior to making the copies.

If you have any questions or concerns about this request or its scope, please feel free to contact me at [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org) or 714-450-3967. *See Gov't Code § 6253.1*.

Please send the requested documents electronically to [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org). If you have any questions, please feel free to contact me at [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org) or 714-450-3967.

Sincerely,



---

Eve Garrow, Senior Policy Analyst and Advocate

ACLU of Southern California

# Exhibit B

**From:** [Kevin Wong](#)  
**To:** [Eve Garrow](#)  
**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list  
**Date:** Wednesday, October 11, 2023 3:11:03 PM

---

Eve Garrow  
[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)

Re: Housing Choice Voucher Waiting List

Eve Garrow,

The Housing Authority of the City of Los Angeles (HACLA) has received your request for information relating to Housing Choice Voucher Waiting List.

The Housing Authority of the City of Los Angeles is engaged in locating the records requested. However, because the records are located in various locations and the time needed to locate them will require an extension of the 10 day period under California Public Records Act §6253. Therefore, we will be in contact with you as soon as possible.

In the meantime, please contact Maria Cabrera ([maria.cabrera@hacla.org](mailto:maria.cabrera@hacla.org)), if you have any questions.

**Kevin Wong** | Records Management Specialist  
e: [kevin.wong@hacla.org](mailto:kevin.wong@hacla.org)  
p: 213-252-5497

---

**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Sent:** Thursday, October 5, 2023 3:49 PM  
**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>  
**Subject:** California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

To Kevin Wong, Records Management Specialist, Housing Authority of the City of Los Angeles,

Please see the attached California Public Records Act Request letter from the ACLU of Southern California. Feel free to contact me with any questions or needed clarifications.

Best,  
Eve Garrow

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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# Exhibit C



October 28, 2024

*By email: kevin.wong@acla.org*

Kevin Wong, Records Management Specialist

Housing Authority of the City of Los Angeles (HACLA)  
2600 Wilshire Blvd.  
Los Angeles, CA 90057  
213-252-5497

RE: Records regarding HACLA's Housing Choice Voucher waiting list

To: Kevin Wong, Records Management Specialist:

I request records regarding HACLA's Housing Choice Voucher (HCV) waiting list. This request is made pursuant to the California Public Records Act, Government Code §6250, et seq. and the California Constitution, as amended by passage of Prop. 59 on November 3, 2004.

Please produce records, data, and information regarding the HACLA HCV waiting list as of the date of this letter. I request the following records, data, and information:

1. For the HACLA HCV waiting list lottery application periods in 2017 and 2022:
  - a. The dates the waiting list lottery application periods opened and closed;
  - b. The number of applications received during each lottery application period;
  - c. The number of applicants entered onto the waiting list as a result of each lottery application period;
  - d. Any priority categories in effect for applicants entering the waiting list, and the number of applicants in each of these categories.
2. For applicants on the waiting list who entered the waiting list anytime other than the waiting list lottery application periods in 2017 and 2022, please provide:
  - a. The total number of applicants placed on the waitlist;
  - b. Any priority categories in effect for applicants entering the waiting list, and the number of applicants in each of these categories.
3. For each applicant active on the waiting list as of the date of this letter, please provide individual-level records, data, and information, anonymized if required, indicating:
  - a. The date the applicant was placed on the waiting list;

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\*deceased



- b. The priority category or categories to which the applicant has been assigned (i.e., a category such as “homeless—waiting list limited preference”) that prioritize the applicant on the waiting list for a HCV, if any.
4. For each applicant placed on the waiting list between January 1, 2012 and the date of this letter that has been removed from the waiting list, please provide individual-level records, anonymized if required, indicating:
  - a. The date the applicant was placed on the waiting list;
  - b. The date the applicant was removed from the waiting list;
  - c. The status of the applicant removed from the waiting list and the date the applicant obtained this status, including but not limited to:
    - i. The applicant has received a HCV and is searching for a rental;
    - ii. The applicant became a “new admission” (i.e., the applicant received a HCV and “leased up”);
    - iii. The applicant was found to be ineligible because they no longer qualify for the HCV program;
    - iv. The applicant did not respond to the selection notification letter or otherwise could not be located.
  - d. Whether the applicant belonged to a priority category, and if so, which category.
5. For each applicant who received an HCV between January 1, 2012 and the date of this letter that was not pulled from the HCV master waitlist, including but not limited to applicants referred for special purpose vouchers, please produce individual-level records and data anonymized if required, on:
  - a. The date the applicant was referred to HACLA;
  - b. The type of voucher for which they were referred, including but not limited to mainstream HCV (core program), special purpose voucher for non-elderly disabled, mainstream, HUD-VASH, project-based, waiting list limited preference—Homeless, waiting list limited preference—LAUSD, and waiting list limited preference—tenant based supportive housing;
  - c. The referring department or program (if any), including but not limited to the Department of Children and Family Services, Veterans Affairs, the Department of Health Services, and the Department of Mental Health through the Coordinated Entry System;
  - d. The date the applicant received an HCV, if any;
  - e. The date the applicant became a “new admission” (i.e., the applicant received an HCV and “leased up”), if any.

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\*deceased



- f. The date the applicant was dropped from the list for a reason other than receiving an HVC or “leasing up,” if any, and the reason the applicant was taken off the waiting list.

The California Public Records Act requires a response within 10 days of your receipt of this request. Please let me know within 10 days whether you have disclosable records and, if so, the estimated date for disclosure.

If records are maintained in electronic format, please provide them in that same format to retain metadata and avoid copying costs. Because the ACLU SoCal is a nonprofit civil rights organization, we request that you waive any fees that would be normally applicable to a Public Records Act request. *See N. County Parents Org. v. Dep't of Educ.*, 23 Cal. App. 4th 144, 146 (1994). However, should you be unable to do so, the ACLU SoCal will reimburse your agency for the “direct costs” of copying these records (if your agency elects to charge for copying) plus postage. *See Cal. Gov't Code § 6253(b)* (only “direct costs of duplication” can be charged to the requesting party). If you anticipate that these costs will exceed \$100, please notify me of the cost prior to making the copies.

If you have any questions or concerns about this request or its scope, please feel free to contact me at [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org) or 714-450-3967. *See Gov't Code § 6253.1*.

Please send the requested documents electronically to [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org). If you have any questions, please feel free to contact me at [egarrow@aclusocal.org](mailto:egarrow@aclusocal.org) or 714-450-3967.

Sincerely,

A handwritten signature in black ink that reads "Eve Garrow".

---

Eve Garrow, Senior Policy Analyst  
ACLU of Southern California

**EXECUTIVE DIRECTOR** Hector O. Villagra

**CHAIR** Stacy Horth-Neubert **VICE CHAIR** Rob Hennig

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\*deceased

# Exhibit D

**From:** [Eve Garrow](#)  
**To:** [Kevin Wong](#)  
**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list  
**Date:** Monday, October 28, 2024 5:57:00 PM  
**Attachments:** [Public Records Act Request--HCV waitlist data HACLA.pdf](#)

---

Dear Kevin Wong,

I am responding to our last correspondence on a California PRA request I submitted about a year ago. As I have not received any responsive records to date, I am resubmitting an updated request, attached. Please consider the attached letter as a new, updated request from the ACLU of Southern California and disregard the letter from last year dated 10/5/23. Feel free to contact me with any questions or needed clarifications.

Best,

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Kevin Wong <Kevin.Wong@hacla.org>  
**Sent:** Wednesday, October 11, 2023 3:11 PM  
**To:** Eve Garrow <EGarrow@aclusocal.org>  
**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

**Eve Garrow**  
[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)

Re: Housing Choice Voucher Waiting List

Eve Garrow,

The Housing Authority of the City of Los Angeles (HACLA) has received your request for information relating to Housing Choice Voucher Waiting List.

The Housing Authority of the City of Los Angeles is engaged in locating the records requested. However, because the records are located in various locations and the time needed to locate them will require an extension of the 10 day period under California Public

Records Act §6253. Therefore, we will be in contact with you as soon as possible.

In the meantime, please contact Maria Cabrera ([maria.cabrera@hacla.org](mailto:maria.cabrera@hacla.org)), if you have any questions.

**Kevin Wong** | Records Management Specialist

e: [kevin.wong@hacla.org](mailto:kevin.wong@hacla.org)

p: 213-252-5497

---

**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Sent:** Thursday, October 5, 2023 3:49 PM

**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>

**Subject:** California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

To Kevin Wong, Records Management Specialist, Housing Authority of the City of Los Angeles,

Please see the attached California Public Records Act Request letter from the ACLU of Southern California. Feel free to contact me with any questions or needed clarifications.

Best,

Eve Garrow

---

Eve Garrow

*Pronouns: She, Her, Hers*

Senior Policy Analyst & Advocate, *Dignity for All Project*

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# **Exhibit E**

**From:** [Kath Rogers](#)  
**To:** [Kevin Wong](#)  
**Cc:** [Eve Garrow](#); [Mariela.Osorio@hacla.org](#); [james.johnson@hacla.org](#)  
**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list  
**Date:** Wednesday, December 11, 2024 12:01:32 PM  
**Attachments:** [Public Records Act Request--HCV waitlist data\\_HACLA.pdf](#)

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Dear Mr. Wong,

I am writing to follow up on a Public Records Request submitted by Eve Garrow with the ACLU of Southern California over a year ago, pursuant to Government Code § 7920. Ms. Garrow subsequently re-submitted her request on October 28, 2024 (*attached*). To date, your agency has not produced any responsive records to either request. Nor has your agency sent substantive responses to either request.

Your agency has not met its legal requirement to respond to this public records request within 10 days. See Gov't Code § 7922.000. Further, if your agency is choosing to withhold information, you must justify such withholding. Gov't Code § 7922.000.

We wish to resolve this matter without legal escalation, and we are more than willing to work with your team to answer any questions to clarify the request, if needed. Please respond as soon as possible with a timeline for when responsive records will be produced.

If you determine that some, but not all, of the information is exempt from disclosure and that the agency intends to withhold it, please redact those portions which are deemed exempt and provide the rest as requested. See Gov't Code § 7922.525.

(CC: James Johnson, HACLA General Counsel)

Sincerely,

Kath Rogers, Staff Attorney  
Pronouns: she/her/hers  
ACLU of Southern California  
1313 W 8th Street, Suite 200  
Los Angeles, CA 90017  
(o) 213.977.5278

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---

**From:** Eve Garrow <EGarrow@aclusocal.org>  
**Sent:** Monday, October 28, 2024 5:57 PM  
**To:** Kevin Wong <Kevin.Wong@hacla.org>

**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

Dear Kevin Wong,

I am responding to our last correspondence on a California PRA request I submitted about a year ago. As I have not received any responsive records to date, I am resubmitting an updated request, attached. Please consider the attached letter as a new, updated request from the ACLU of Southern California and disregard the letter from last year dated 10/5/23. Feel free to contact me with any questions or needed clarifications.

Best,

---

Eve Garrow

*Pronouns: She, Her, Hers*

Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>

**Sent:** Wednesday, October 11, 2023 3:11 PM

**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

Eve Garrow  
[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)

Re: Housing Choice Voucher Waiting List

Eve Garrow,

The Housing Authority of the City of Los Angeles (HACLA) has received your request for information relating to Housing Choice Voucher Waiting List.

The Housing Authority of the City of Los Angeles is engaged in locating the records requested. However, because the records are located in various locations and the time needed to locate them will require an extension of the 10 day period under California Public Records Act §6253. Therefore, we will be in contact with you as soon as possible.

In the meantime, please contact Maria Cabrera ([maria.cabrera@hacla.org](mailto:maria.cabrera@hacla.org)), if you have any questions.

**Kevin Wong** | Records Management Specialist  
e: [kevin.wong@hacla.org](mailto:kevin.wong@hacla.org)  
p: 213-252-5497

---

**From:** Eve Garrow <[EveGarrow@aclusocal.org](mailto:EveGarrow@aclusocal.org)>  
**Sent:** Thursday, October 5, 2023 3:49 PM  
**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>  
**Subject:** California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

To Kevin Wong, Records Management Specialist, Housing Authority of the City of Los Angeles,

Please see the attached California Public Records Act Request letter from the ACLU of Southern California. Feel free to contact me with any questions or needed clarifications.

Best,  
Eve Garrow

---  
Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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# Exhibit F

**From:** [Eve Garrow](#)  
**To:** [Maria Cabrera](#)  
**Subject:** RE: CPRA: ACLU  
**Date:** Thursday, February 20, 2025 11:26:00 AM  
**Attachments:** [image001.png](#)

---

Thank you Maria. I'll circle back next Thursday to see if there is an update.

Best  
Eve

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
**Sent:** Thursday, February 20, 2025 10:29 AM  
**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Subject:** Re: CPRA: ACLU

Good Morning Eve,

Thank you for your follow up, I wish I had more tangible updates for you but unfortunately I do not. The information you requested is not something we have readily available it has to be extracted from our database and only limited staff can do that. I have bumped this up to my supervisor and we are scheduled to meet on Tuesday (2/25) to discuss and hopefully resolve this request. I ask for your patience for one more week so I can provide a better update (or if all goes well the records).

Best,  
Maria



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

---

**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Sent:** Thursday, February 20, 2025 9:54 AM  
**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
**Subject:** RE: CPRA: ACLU

Hi Maria,

Just bumping up this request for an update.

Best,  
Eve

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Sent:** Friday, February 14, 2025 12:18 PM

**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>

**Subject:** RE: CPRA: ACLU

Dear Maria,

Thank you so much for the responsive records to date. They are very helpful!

In terms of the individualized data, in the below correspondence you stated that you would provide the estimated delivery date the week of December 16. Can you please provide that date for me? I'm happy to jump on a call if there is anything I can do to clarify the request. Other PRAs have provided the individualized data in spreadsheet format.

All the best,

Eve

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Eve Garrow

*Pronouns: She, Her, Hers*

Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>

**Sent:** Thursday, December 12, 2024 4:07 PM

**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Cc:** Daniel Lamphear <[Daniel.Lamphear@hacla.org](mailto:Daniel.Lamphear@hacla.org)>; Tania De La Pena <[tania.delapena@hacla.org](mailto:tania.delapena@hacla.org)>; Ajay Shah <[Ajay.Shah@hacla.org](mailto:Ajay.Shah@hacla.org)>; Patricia Mendoza <[Patricia.Mendoza@hacla.org](mailto:Patricia.Mendoza@hacla.org)>; Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>; James Johnson <[James.Johnson@hacla.org](mailto:James.Johnson@hacla.org)>

**Subject:** CPRA: ACLU

Good Afternoon Ms. Garrow,

I am attaching some documents here that will answer most of the points under item #1 and #2. Unfortunately I can not create a document to answer your questions but only provide the available records. Therefore I'm attaching several documents that contain the information you are looking for.

For the individualized data for the remainder of your request I will discuss with our team and we will provide an estimated delivery date next week. If you have any questions about the documents attached or want to get on the phone to discuss where to find the specific data listed in your request please feel free to give me a call.

Best Regards,  
Maria Cabrera



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

# Exhibit G

**From:** [Eve Garrow](#)  
**To:** [Maria Cabrera](#)  
**Subject:** RE: CPRA: ACLU  
**Date:** Tuesday, May 6, 2025 2:22:00 PM  
**Attachments:** [image001.png](#)

---

Hi Maria,

I am writing to request an update on this Public Records Act request.

Best,  
Eve

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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---

**From:** Maria Cabrera <Maria.Cabrera@hacla.org>  
**Sent:** Thursday, February 20, 2025 10:29 AM  
**To:** Eve Garrow <EGarrow@aclusocal.org>  
**Subject:** Re: CPRA: ACLU

Good Morning Eve,

Thank you for your follow up, I wish I had more tangible updates for you but unfortunately I do not. The information you requested is not something we have readily available it has to be extracted from our database and only limited staff can do that. I have bumped this up to my supervisor and we are scheduled to meet on Tuesday (2/25) to discuss and hopefully resolve this request. I ask for your patience for one more week so I can provide a better update (or if all goes well the records).

Best,  
Maria



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

---

**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Sent:** Thursday, February 20, 2025 9:54 AM  
**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
**Subject:** RE: CPRA: ACLU

Hi Maria,

Just bumping up this request for an update.

Best,  
Eve

---

Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Sent:** Friday, February 14, 2025 12:18 PM  
**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
**Subject:** RE: CPRA: ACLU

Dear Maria,

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In terms of the individualized data, in the below correspondence you stated that you would provide the estimated delivery date the week of December 16. Can you please provide that date for me? I'm happy to jump on a call if there is anything I can do to clarify the request. Other PRAs have provided the individualized data in spreadsheet format.

All the best,  
Eve

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Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**Cc:** Daniel Lamphear <[Daniel.Lamphear@hacla.org](mailto:Daniel.Lamphear@hacla.org)>; Tania De La Pena <[tania.delapena@hacla.org](mailto:tania.delapena@hacla.org)>; Ajay Shah <[Ajay.Shah@hacla.org](mailto:Ajay.Shah@hacla.org)>; Patricia Mendoza <[Patricia.Mendoza@hacla.org](mailto:Patricia.Mendoza@hacla.org)>; Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>; James Johnson <[James.Johnson@hacla.org](mailto:James.Johnson@hacla.org)>  
**Subject:** CPRA: ACLU

Good Afternoon Ms. Garrow,

I am attaching some documents here that will answer most of the points under item #1 and #2. Unfortunately I can not create a document to answer your questions but only provide the available records. Therefore I'm attaching several documents that contain

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Best Regards,  
Maria Cabrera



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

# Exhibit H

**From:** [Eve Garrow](#)  
**To:** [Maria Cabrera](#)  
**Bcc:** [Kath Rogers](#)  
**Subject:** RE: CPRA: ACLU  
**Date:** Monday, June 2, 2025 2:15:00 PM  
**Attachments:** [image001.png](#)  
[Public Records Act Request--HCV waitlist data\\_HACLA.pdf](#)

---

Hi Maria,

I am writing again to request an update on the ACLU SoCal's CPRA request dated October 28, 2024 (below and attached). I'm happy to meet with you to clarify the scope of what I am seeking, if that would be helpful. To date, the records I have received (on December 12, 2024) can be found on HACLA's website. I have received the types of public records in this CPRA request from several other housing authorities in California and look forward to timely production of responsive records from your office.

All the best,

Eve

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Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**From:** Eve Garrow <EGarrow@aclusocal.org>  
**Sent:** Tuesday, May 6, 2025 2:23 PM  
**To:** Maria Cabrera <Maria.Cabrera@hacla.org>  
**Subject:** RE: CPRA: ACLU

Hi Maria,

I am writing to request an update on this Public Records Act request.

Best,

Eve

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Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**From:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>

**Sent:** Thursday, February 20, 2025 10:29 AM

**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Subject:** Re: CPRA: ACLU

Good Morning Eve,

Thank you for your follow up, I wish I had more tangible updates for you but unfortunately I do not. The information you requested is not something we have readily available it has to be extracted from our database and only limited staff can do that. I have bumped this up to my supervisor and we are scheduled to meet on Tuesday (2/25) to discuss and hopefully resolve this request. I ask for your patience for one more week so I can provide a better update (or if all goes well the records).

Best,  
Maria



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

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**Sent:** Thursday, February 20, 2025 9:54 AM  
**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
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Just bumping up this request for an update.

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Eve

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Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
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**Sent:** Thursday, December 12, 2024 4:07 PM  
**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>  
**Cc:** Daniel Lamphear <[Daniel.Lamphear@hacla.org](mailto:Daniel.Lamphear@hacla.org)>; Tania De La Pena <[tania.delapena@hacla.org](mailto:tania.delapena@hacla.org)>; Ajay Shah <[Ajay.Shah@hacla.org](mailto:Ajay.Shah@hacla.org)>; Patricia Mendoza <[Patricia.Mendoza@hacla.org](mailto:Patricia.Mendoza@hacla.org)>; Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>; James Johnson <[James.Johnson@hacla.org](mailto:James.Johnson@hacla.org)>  
**Subject:** CPRA: ACLU

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Maria Cabrera



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

# Exhibit I

**From:** [Eve Garrow](#)  
**To:** [Maria Cabrera](#); [Kevin Wong](#)  
**Subject:** RE: CPRA: ACLU  
**Date:** Friday, July 18, 2025 10:20:00 AM  
**Attachments:** [image001.png](#)  
[Public Records Act Request--HCV waitlist data\\_HACLA.pdf](#)

---

Hello Maria and Kevin,

I am following up to request an update on the ACLU SoCal's CPRA request dated October 28, 2024 (see below and attached). If it would be helpful, I am available to meet and further clarify the scope of the request.

To date, the only records I have received (as of December 12, 2024) are those posted on HACLA's website. I want to note that I have received records responsive to the request from several other housing authorities in California and hope to receive timely production of all responsive records from your office.

I have sent several reminder emails to Maria since February 2025 without receiving a response. If there is a different contact I should reach out to regarding this request, please let me know.

Thank you for your attention to this matter.

All the best,  
Eve

---  
Eve Garrow  
*Pronouns: She, Her, Hers*  
Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**From:** Eve Garrow  
**Sent:** Monday, June 2, 2025 2:15 PM  
**To:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>  
**Subject:** RE: CPRA: ACLU

Hi Maria,

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Eve Garrow

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**Subject:** RE: CPRA: ACLU

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**From:** Maria Cabrera <[Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)>

**Sent:** Thursday, December 12, 2024 4:07 PM

**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Cc:** Daniel Lamphear <[Daniel.Lamphear@hacla.org](mailto:Daniel.Lamphear@hacla.org)>; Tania De La Pena <[tania.delapena@hacla.org](mailto:tania.delapena@hacla.org)>; Ajay Shah <[Ajay.Shah@hacla.org](mailto:Ajay.Shah@hacla.org)>; Patricia Mendoza <[Patricia.Mendoza@hacla.org](mailto:Patricia.Mendoza@hacla.org)>; Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>; James Johnson <[James.Johnson@hacla.org](mailto:James.Johnson@hacla.org)>

**Subject:** CPRA: ACLU

Good Afternoon Ms. Garrow,

I am attaching some documents here that will answer most of the points under item #1 and #2. Unfortunately I can not create a document to answer your questions but only provide the available records. Therefore I'm attaching several documents that contain the information you are looking for.

For the individualized data for the remainder of your request I will discuss with our team and we will provide an estimated delivery date next week. If you have any questions about the documents attached or want to get on the phone to discuss where to find the specific data listed in your request please feel free to give me a call.

Best Regards,  
Maria Cabrera



**Maria Cabrera** | Administrative Assistant

e: [Maria.Cabrera@hacla.org](mailto:Maria.Cabrera@hacla.org)

p: (213) 712-6710

**Housing Authority of the City of Los Angeles**

**Section 8 Department**

2600 Wilshire Blvd, 3<sup>rd</sup> Floor

Los Angeles, CA 90057

w: [hacla.org](http://hacla.org)

# Exhibit J

**From:** [James Johnson](#)  
**To:** [Kath Rogers](#)  
**Cc:** [Kevin Wong](#); [Mariela Osorio](#); [Eve Garrow](#); [Ajay Shah](#)  
**Subject:** RE: ACLU CPRA Request - Housing Choice Voucher waiting list  
**Date:** Friday, August 29, 2025 8:53:32 AM

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Good morning. I appreciate you following up.

My colleagues Ajay and Kevin will look into this and get back to you. Thank you.

James

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**From:** Kath Rogers <KRogers@aclusocal.org>  
**Sent:** Thursday, August 28, 2025 9:01 PM  
**To:** James Johnson <james.johnson@hacla.org>  
**Cc:** Kevin Wong <kevin.wong@hacla.org>; Mariela Osorio <mariela.osorio@hacla.org>; Eve Garrow <EGarrow@aclusocal.org>  
**Subject:** ACLU CPRA Request - Housing Choice Voucher waiting list

Dear James Johnson,

I am writing to bring your immediate attention to HACLA's ongoing failure to answer emails or produce records in response to a request for records under the California Public Records Act (CPRA), Government Code § 7920 et seq.

Over two years ago, Eve Garrow of the American Civil Liberties Union of Southern California (ACLU SoCal, CC'ed) submitted a request for records from HACLA related to the waiting list for Housing Choice vouchers. Below is an email I sent last year (December 2024) alerting your agency to HACLA's failure to respond to this request.

Unfortunately, while HACLA staff initially followed up with Ms. Garrow about her request following my email, they subsequently stopped responding altogether and failed to produce most of the responsive records. Attached is a copy of Ms. Garrow's repeated attempts to inquire about the status of this request with HACLA staff Kevin Wong and Maria Cabrera. To date, Ms. Garrow has not received any responses to her emails since February of this year; nor has she received most of the requested records or a rationale for the significant delay. HACLA's failure to respond is a violation of the CPRA, and it is perplexing because Ms. Garrow has received prompt responses to CPRA requests for the same types of records from multiple other public housing agencies in California.

**The goal of this email is to provide a final opportunity for HACLA to comply with the law by producing these responsive records no later than October 10, 2025. If HACLA does not fulfill its obligations under the CPRA related to this request, we will be forced to consider legal escalation.**

Please contact Ms. Garrow with any questions related to this request. Thank you in advance for your anticipated cooperation.

Sincerely,

Kath Rogers, Senior Staff Attorney  
Pronouns: she/her/hers  
ACLU of Southern California  
1313 W 8th Street, Suite 200  
Los Angeles, CA 90017  
(o) 213.977.5278

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**From:** Kath Rogers  
**Sent:** Wednesday, December 11, 2024 12:01 PM  
**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>  
**Cc:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>; [Mariela.Osorio@hacla.org](mailto:Mariela.Osorio@hacla.org); [james.johnson@hacla.org](mailto:james.johnson@hacla.org)  
**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

Dear Mr. Wong,

I am writing to follow up on a Public Records Request submitted by Eve Garrow with the ACLU of Southern California over a year ago, pursuant to Government Code § 7920. Ms. Garrow subsequently re-submitted her request on October 28, 2024 (*attached*). To date, your agency has not produced any responsive records to either request. Nor has your agency sent substantive responses to either request.

Your agency has not met its legal requirement to respond to this public records request within 10 days. See Gov't Code § 7922.000. Further, if your agency is choosing to withhold information, you must justify such withholding. Gov't Code § 7922.000.

We wish to resolve this matter without legal escalation, and we are more than willing to work with your team to answer any questions to clarify the request, if needed. Please respond as soon as possible with a timeline for when responsive records will be produced. If you determine that some, but not all, of the information is exempt from disclosure and that the agency intends to withhold it, please redact those portions which are deemed exempt and provide the rest as requested. See Gov't

Code § 7922.525.

*(CC: James Johnson, HACLA General Counsel)*

Sincerely,

Kath Rogers, Staff Attorney  
Pronouns: she/her/hers  
ACLU of Southern California  
1313 W 8th Street, Suite 200  
Los Angeles, CA 90017  
(o) 213.977.5278

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**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Sent:** Monday, October 28, 2024 5:57 PM

**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>

**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

Dear Kevin Wong,

I am responding to our last correspondence on a California PRA request I submitted about a year ago. As I have not received any responsive records to date, I am resubmitting an updated request, attached. Please consider the attached letter as a new, updated request from the ACLU of Southern California and disregard the letter from last year dated 10/5/23. Feel free to contact me with any questions or needed clarifications.

Best,

---

Eve Garrow

*Pronouns: She, Her, Hers*

Senior Policy Analyst & Advocate, *Dignity for All Project*  
ACLU of Southern California | 714-450-3967 | @EveGarrow

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**From:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>

**Sent:** Wednesday, October 11, 2023 3:11 PM

**To:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Subject:** RE: California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

Eve Garrow  
[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)

Re: Housing Choice Voucher Waiting List

Eve Garrow,

The Housing Authority of the City of Los Angeles (HACLA) has received your request for information relating to Housing Choice Voucher Waiting List.

The Housing Authority of the City of Los Angeles is engaged in locating the records requested. However, because the records are located in various locations and the time needed to locate them will require an extension of the 10 day period under California Public Records Act §6253. Therefore, we will be in contact with you as soon as possible.

In the meantime, please contact Maria Cabrera ([maria.cabrera@hacla.org](mailto:maria.cabrera@hacla.org)), if you have any questions.

**Kevin Wong** | Records Management Specialist

e: [kevin.wong@hacla.org](mailto:kevin.wong@hacla.org)

p: 213-252-5497

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**From:** Eve Garrow <[EGarrow@aclusocal.org](mailto:EGarrow@aclusocal.org)>

**Sent:** Thursday, October 5, 2023 3:49 PM

**To:** Kevin Wong <[Kevin.Wong@hacla.org](mailto:Kevin.Wong@hacla.org)>

**Subject:** California Public Records Act Request: HACLA records concerning Housing Choice Voucher waiting list

To Kevin Wong, Records Management Specialist, Housing Authority of the City of Los Angeles,

Please see the attached California Public Records Act Request letter from the ACLU of Southern California. Feel free to contact me with any questions or needed clarifications.

Best,  
Eve Garrow

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Eve Garrow

*Pronouns: She, Her, Hers*

Senior Policy Analyst & Advocate, *Dignity for All Project*

ACLU of Southern California | 714-450-3967 | @EveGarrow

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