



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN
RIGHTS, et al.

Plaintiff,

v.

CITY OF LOS ANGELES, et al.

Defendant.

Case No. LA CV 20-02291-DOC(KESx)

Judge: Hon. David O. Carter

**SPECIAL MASTER'S
MEMORANDUM**

Memorandum

To: Counsel for the City of Los Angeles

From: Michele Martinez, Special Master

Date: November 16, 2025

Re: Data Clarification Requests – Q3 Special Master Report, Settlement Agreement Obligations, and Related Filings

Introduction

This memorandum follows recent inquiries to the City in connection with preparation of the Special Master Report for Quarter 3. It also addresses the City's supplemental report filed on November 11, 2025 (Dkt. 1072), the LA Alliance's filing of November 10, 2025 (Dkt. 1070), and ongoing obligations under the Settlement Agreement and Court orders, including Dkt. 991.

To ensure the Court has a complete and accurate record, I am requesting verified underlying data and clarification of revisions contained in the City's quarterly and supplemental reports, as well as confirmation of compliance with Section 7.1 requirements. I will also inform the Court of this correspondence, so the record reflects the City's obligations and deadlines.

Issue One: Beds/Units Data Revisions

The first issue concerns changes made to the reported number of beds/units open to date and beds/units in process.

In the initial Q3 report submitted September 15, 2025, the City reported:

Units/Beds open to date: 8,104

Units/Beds in process: 5,105

In the supplemental report filed November 11, 2025, for the period ending September 30, 2025, the City reported:

Units/Beds open to date: 8,002

Units/Beds in process: 5,114

The notes provided in the supplemental do not fully explain the basis for these revisions. Clarification is requested regarding the changes, particularly given that the City's obligation for the reporting period was to account for PEH served through current intervention opportunities.

Issue Two: PEH Served Data Revisions

The second issue concerns supplemental data on PEH served. In the initial Q3 report submitted September 15, 2025, the PEH served figures were marked as pending. In contrast, the supplemental report filed November 11, 2025, for the period ending September 30, 2025, included updated PEH served data.

Clarification is requested on both the third-quarter changes and the cumulative totals, including how the supplemental figures compare to the City's July 31, 2025 report and the September 30, 2025 supplemental.

Example: In the report ending June 30, 2025 (Observation No. 17), the intervention type was PSH, funded by Prop HHH, located at VA Building 207.

Reported:

Units/Beds: 59

Open and occupiable as of 12/22/22

Total PEH served: 59

Supplemental report:

Units/Beds: 59

Total PEH served: 31

Because PSH represents permanent units, I request the underlying verified data to clarify this change.

Bed/Unit Milestones

On October 3, 2025, the City submitted its new bed plan and milestones aligned with that plan. The submission included overall totals for fiscal year quarters but did not provide the required breakdown by council district and intervention for FY 2025-26 (Q1–Q4) and FY 2026-27 (Q1–Q4).

Section 5.2 of the Settlement Agreement requires the City to create plans and develop milestones and deadlines specific to each Council District, including shelter and housing solutions, encampment engagement, cleaning, and reduction. Verified, quarter-specific data and supporting documentation are essential for the Court to evaluate compliance. The detailed breakdowns aligned with the new bed plan are therefore requested, in addition to overall totals.

Section 7.1 Requirements and Dispute Resolution

The City has coordinated a meeting with all parties and the Special Master to discuss additional information missing from the quarterly reports under Section 7.1.

That meeting is scheduled for Monday, November 17, 2025, at 12:00 p.m.

As noted in prior Special Master Reports (Year One, Dkt. 674, p. 18; Second Report, p. 29):

- The City is expected to provide greater transparency in quarterly reports, including verified PEH engagement data.

- Quarterly Data Expansion is required: future reports must include comprehensive PEH engagement metrics, shelter rejections, and reasons, to identify service gaps and ensure proper referrals.

Agreement to meet does not itself ensure that the City will provide the required information or address the compliance concerns raised in prior reports. Confirmation is requested on whether this data has been collected, the City is asked to provide its response no later than November 17, 2025, at 10:00 a.m., prior to the scheduled meeting.

Plaintiffs have formally asked the Court to resolve this dispute and raised the City's non-compliance with Section 7.1 in their November 10, 2025 filing (Dkt. 1070).

Responsibility to Produce Data

The City often references outside entities such as its Continuum of Care (CoC), housing authorities, or third-party contractors for homeless and outreach programs as the source of data.

These entities are not parties to this lawsuit. The obligation remains with the City to gather, verify, and produce the underlying datasets. While the City may rely on outside entities for information, it is the City that bears responsibility to present records to the Court.

It is not the role of the Special Master to obtain data directly from LAHSA, the CoC, housing authorities, or other contractors.

Deadlines for Other Requests

In addition to the Section 7.1 requirement above, the following are requested by November 18, 2025, at 10:00 a.m.:

- Verified Q3 2025 PEH served data (including cumulative totals) with underlying documentation explaining revisions noted in the supplemental report.
- Verified bed/unit and bed-in-process data with underlying documentation explaining revisions between the initial Q3 and supplemental reports.
- Confirmation whether all PEH served data is sourced from LAHSA.
- Identification of the sources for bed/units open and beds in process data.
- Confirmation whether the LA Alliance milestones by Council District and intervention remain the same as those submitted on November 2, 2022; and if not, updated Alliance milestones with quarter-specific breakdowns aligned to the new bed plan, by Council District and intervention.

Respectfully,
Michele Martinez
Special Master