



March 17, 2012

Direct: (323) 436-8900 x5838

VIA U.S. mail and FAX

To: Jonathan Fielding, MD, MPH
Director of Public Health and Health Officer
County of Los Angeles
313 North Figueroa Street Rm. 806
Los Angeles 90012

Re: Adult film production complaint, Immoral Productions, LLC

Dear Doctor Fielding:

This letter constitutes a formal complaint against *Immoral Productions*, a Los Angeles adult film production company with a provisional health permit issued through the County of Los Angeles Department of Public Health. As you are aware, adult film producers are required to ensure the use of personal protective equipment (condoms) for all vaginal and anal penetrative acts. An anonymous letter sent to our organization indicates that *Immoral Productions* is producing adult themed content wherein actors are engaging in vaginal and anal penetrative acts without the use of condoms. We have verified this claim through a review of content at: <http://www.immorallive.com/>. Such acts are known to traumatize vaginal and rectal mucosa and significantly increase the risk of acquiring infectious diseases. Business activities occurring at *Immoral Productions* pose a substantial risk of bodily harm and life long disability.

Under Title 11, Section 39 of the Los Angeles County Health and Safety Code ("Section 39"), adult film producers are required, among other things, to obtain a public health permit through your department and use personal protective equipment to prevent exposure to bloodborne pathogens and other infectious diseases. *Immoral Productions* knowingly produces adult material within the jurisdiction of the Los Angeles County that is in violation of Section 39 in the following ways:

- a. Failure to use personal protective equipment (condoms) for vaginal and anal sexual intercourse;
- b. Failure to provide proof of successful completion of bloodborne pathogen training for all production company principals and management level employees;
- c. Failure to submit an Exposure Control Plan and methods of compliance that meets the requirements of the California Code of Regulations at Title 8 § 5193, and § 3203 respectively; and
- d. Failure to display a legible sign in conventional typeface no smaller than 36 points notifying production staff that "The use of condoms is required for all acts of anal or vaginal during production of adult films to protect performers from sexually transmitted infections..."

The AIDS Healthcare Foundation is the nation's largest provider of testing and treatment for sexually transmitted infections. We provide life-saving medications and care to over 200,000 patients worldwide, regardless of ability to pay. We consider this matter urgent, and of critical importance to our overall mission and the public health of individuals in Los Angeles County.

Within the County of Los Angeles, adult film producers are legal entities and required by law to have a public health permit. The Department of Public Health may revoke or suspend the permit of any production company in violation of Section 39. *Immoral Productions* knowingly exposes actors to disease despite the availability of effective preventative measures. We request your immediate investigation of this matter and that you act under the full authority issued to your department under Section 39. We further request that your department inform our organization of the status of the alleged violations listed above within 30 days of receipt of this letter. Thank you in advance for your efforts regarding this matter.

Sincerely,

Mark Roy McGrath, MPH
Research and Policy Analyst
AIDS Healthcare Foundation
Public Health Division
1710 North La Brea Avenue
Los Angeles, CA 90046

Cc: Cynthia Harding, MPH
Chief Deputy Director
County of Los Angeles
313 North Figueroa Street Rm. 708
Los Angeles 90012

Jeffrey D. Gunzenhauser, MD, MPH
Medical Director, Public Health
Los Angeles County Department of Public Health
241 N. Figueroa Street, Suite 275
Los Angeles, CA 90012