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AIDS HEALTHCARE FOUNDATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

AIDS HEALTHCARE FOUNDATION, a
 California non-profit public-benefit
 corporation,

Petitioner,

vs.

CITY OF LOS ANGELES, a Mayor-Council-
 Commission form of California government; **LOS**
ANGELES DEPARTMENT OF BUILDING
AND SAFETY, a Department of the City of Los
 Angeles; **BOARD OF BUILDING AND**
SAFETY COMMISSIONERS; a Board of the
 Los Angeles Department of Building and Safety;
JACOB STEVENS, President of the Board of
 Building and Safety Commissioners, sued in his
 official capacity; **NANCY YAP**, Vice President of
 the Board of Building and Safety Commissioners,
 sued in her official capacity; **JAVIER NUNEZ**,
 Board of Building and Safety Commissioner, sued
 in his official capacity; **MOISES ROSALES**,
 Board of Building and Safety Commissioner, sued
 in his official capacity; **CORISSA**
HERNANDEZ, Board of Building and Safety
 Commissioner, sued in her official capacity; and
DOES 1 through 100, inclusive,

Respondents.

Case No. **26STCP03858**

**VERIFIED PETITION FOR WRIT OF
 ADMINISTRATIVE MANDATE AND FOR
 WRIT OF ADMINISTRATIVE
 PROHIBITION AND FOR OTHER
 RELIEF (CODE OF CIVIL PROCEDURE
 SECTIONS 1094.5 AND 1102)**

1 By the following verified petition and complaint, Petitioner AIDS Healthcare Foundation
2 (“AHF”) seeks a peremptory writ of administrative mandate, under Code of Civil Procedure
3 section (“CCP”) 1094.5, and a writ of administrative prohibition, under CCP 1102, and associated
4 declaratory and injunctive relief, to compel Respondents City of Los Angeles (the “City”), Los
5 Angeles Department of Building and Safety (“LADBS”), the Board of Building and Safety
6 Commissioners (the “Board”), Board President Jacob Stevens (“President Stevens”), Board Vice
7 President Nancy Yap (“Vice President Yap”), Board Commissioner Javier Nunez (“Commissioner
8 Nunez”), Board Commissioner Moises Rosales (“Commissioner Rosales”), Board Commissioner
9 Corissa Hernandez (“Commissioner Hernandez”), and Does 1 to 100, to set aside any decisions:
10 (1) that the real property located at 1246 South Hope Street, Los Angeles, CA 90015, Los Angeles
11 County Assessors Parcel No. 5139-022-006, and commonly known as the “Morrison Hotel,” is a
12 public nuisance; (2) that AHF must provide a human security guard at the Morrison Hotel 24 hours
13 per day, seven days per week; and (3) that the Morrison Hotel be demolished.

14 INTRODUCTION

15 1. The Morrison Hotel, erected in 1913, is a historically and culturally important – and
16 physically sturdy – four-story building in the City. Continuously since late 2023, AHF has owned
17 the Morrison Hotel. AHF plans to rehabilitate the Morrison Hotel, which is presently vacant, as
18 desperately needed low-income housing for people in the City. AHF is informed and believes and
19 thereon alleges that, without notice to AHF, on or around August 25, 2026, the Board orally
20 announced a false determination that the Morrison Hotel is a public nuisance, under Los Angeles
21 Municipal Code section 91.8904.2. On or around September 29, 2026, without sufficient
22 justification, LADBS ordered AHF to provide a human security guard 24 hours per day, seven days
23 per week, at the Morrison Hotel, which is sufficiently well-secured. AHF strongly suspects that the
24 City is implementing an illegal plan to demolish the Morrison Hotel, to prevent AHF or anyone
25 else from rehabilitating the building as low-income housing, in disregard for helping people living
26 in the streets to find permanent housing. AHF comes to this Court to obtain relief that will
27 overturn the above-noted false determination and unjustified order. More generally, AHF seeks to
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1 save the Morrison Hotel from the machinations of the City, to allow the Morrison Hotel to be
2 rehabilitated for use as low-income housing. Additionally, AHF seeks to prevent the City from
3 trying to pass blame to AHF for the large number of people who are unhoused in the City, and
4 who, because of harassment by the City, sometimes resort to taking unauthorized shelter in vacant
5 private buildings like the Morrison Hotel, despite security protections at those buildings.

6 **PARTIES**

7 2. Petitioner AHF is and at all relevant times was a California non-profit public-benefit
8 corporation headquartered and lawfully doing business in Los Angeles County. As owner of the
9 Morrison Hotel, which is also located in Los Angeles County, AHF has recently heard of or been
10 given invalid and unlawful orders by the City, and its subdivisions and personnel, about and
11 affecting the Morrison Hotel. AHF has standing to and does oppose those orders via administrative
12 writ proceedings, and thereby, in this Court, AHF seeks to save the Morrison Hotel for
13 rehabilitation for use as desperately needed low-income housing.

14 3. Respondent City is a duly organized city of the State of California; is self-described
15 as a “Mayor-Council-Commission form of government”; and is authorized to and does promulgate,
16 implement, and enforce building codes and regulations of real-property owners, in the City.

17 4. Respondent LADBS is a department of the City and is authorized to and does
18 implement and enforce building codes and regulations of real-property owners, in the City.

19 5. Respondent Board is a board of LADBS and is authorized to and does make quasi-
20 adjudicatory decisions about whether buildings in the City are public nuisances under Los Angeles
21 Municipal Code section 91.8904.2.

22 6. Respondents President Stevens, Vice President Yap, Commissioner Nunez,
23 Commissioner Rosales, and Commissioner Hernandez are Board Commissioners and, collectively,
24 are authorized to and do make quasi-adjudicatory decisions about whether buildings in the City are
25 public nuisances under Los Angeles Municipal Code section 91.8904.2.

26 7. Respondents Doe 1 through 100 have identities presently unknown to AHF. AHF is
27 informed and believes that Does 1 through 100, or at least some of them, have worked in concert
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1 with the other Respondents, or at least some of them, in the events and circumstances complained
2 of herein. AHF is informed and believes that Does 1 through 100, or at least some of them, may
3 bear at least some of the responsibility for those wrongdoings, and Does 1 through 100, or at least
4 some of them, may need to be compelled to take certain actions or to refrain from taking certain
5 actions, for the wrongs complained of herein to be fully remedied. If and when AHF ascertains the
6 identities and liabilities of Does 1 through 100, or at least some of them, then AHF will amend this
7 petition accordingly.

8 **JURISDICTION AND VENUE**

9 8. This Court has jurisdiction to issue writs of administrative mandate, under Code of
10 Civil Procedure section 1094.5, and writs of administrative prohibition, under Code of Civil
11 Procedure section 1102.

12 9. Venue is proper in this Court because Petitioner AHF is headquartered and lawfully
13 doing business within this Court's geographical jurisdiction, Los Angeles County; because the
14 Morrison Hotel, the real property at issue here, also is located in Los Angeles County; and because
15 Respondents, and each of them, are public entities or public officials taking relevant actions in Los
16 Angeles County. The ongoing and threatened actions of Respondents, and each of them, have
17 injured and will injure AHF in Los Angeles County.

18 10. AHF has a clear, present, and beneficial right to performance by Respondents, and
19 each of them, of only lawful, non-abusive fulfillment of their authorized duties and responsibilities,
20 as well as only lawful, non-abusive exercise of their authorized powers. AHF has a clear, present,
21 and beneficial right to prevent Respondents, and each of them, from unlawfully and abusively
22 performing their duties and exercising their powers.

23 11. AHF has no plain, speedy, and adequate remedy at law for the circumstances and
24 events complained of herein.

25 12. AHF has been prevented by LADBS from exhausting all available administrative
26 remedies, because LADBS did not notify AHF in advance that the Board was considering
27 determining that the Morrison Hotel was a public nuisance, and thus AHF did not know to and did
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1 not either submit evidence in advance of the relevant Board hearing or appear and participate at the
2 Board hearing to argue against the proposition that the Morrison Hotel is a public nuisance. The
3 subsequent LADBS order for AHF to provide a human security guard, 24 hours per day and 7 days
4 per week, at the Morrison Hotel is an invalid derivation of the invalid public-nuisance
5 determination, and there is no need for AHF to try to exhaust administrative remedies in
6 connection with that order.

7 **GENERAL ALLEGATIONS**

8 **The Morrison Hotel**

9 13. The Morrison Hotel has stood at the intersection of South Hope Street and West
10 Pico Boulevard, in downtown Los Angeles, since 1913. The Morrison Hotel is four stories tall,
11 with a basement; has an “E” shape as viewed from above; and covers almost 50,000 square feet.

12 14. The Morrison Hotel has the architectural style known as commercial vernacular,
13 with detailing known as Beaux-Arts classicism. The building is of sturdy brick, steel, and concrete
14 construction. The primary and secondary facades are composed of white glazed face bricks, and
15 the remaining facades are made of standard brick. The main entrance door is surrounded by an
16 original, cast-stone segmental archway, with classical patterned detailing lining the jamb. The
17 vestibule was clad in orange, black, and green tiles, until 2022, when then-owner/developer
18 Relevant Group gutted or allowed to be gutted much of the interior of the building (and the City
19 did nothing to prevent this malfeasance).

20 15. At the very top of the Morrison Hotel is a green galvanized iron band in an egg-and-
21 dart pattern. The upper floors of the Morrison Hotel’s primary façade and secondary/south facade
22 have a long partly white and partly green horizontal galvanized iron band of a Greek meandros
23 pattern. In between the columns of windows on the second, third, and fourth floors is a repeating
24 decorative pattern of white glazed bricks, glazed or unglazed tan/brown bricks, and diamond-
25 shaped green ceramic tiles.

26 16. A high metal security gate closes off the building at street level. All doors into the
27 building are secured by locks, and all unintended/unauthorized ways into the building are secured
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1 by various means. Tie rods for seismic stabilization dot the primary and secondary facades. There
2 are metal fire escapes.

3 17. The Morrison Hotel was designed by a leading early-20th-century architectural firm,
4 Morgan, Walls & Morgan, which also designed the Haas Building, the Garland Building, and the
5 I.N. Van Nuys Building. The construction of the Morrison Hotel was done by prominent
6 contractor F.O. Engstrum, who also built the Riverside County Courthouse that still stands and is in
7 use. The developer of the Morrison Hotel was Victor Ponet, a well-known undertaker and real-
8 estate tycoon, who owned a large tract of land in what is now Hollywood and West Hollywood,
9 and who helped to establish the Sunset Strip.

10 18. The Morrison Hotel is in the neighborhood, in the southern part of downtown Los
11 Angeles, now known as South Park. In the 1910s through the 1960s, the area was known as Auto
12 Row, for the many automobile dealerships and repair shops located there.

13 19. In those decades, the 1910s to the 1960s, the Morrison Hotel had a combination of
14 transient guests, who stayed for a day or a week at a time, and other more permanent guests, who
15 leased rooms by the month. The ground floor hosted various commercial and retail establishments.
16 The Morrison Hotel was considered a working-class building that still had stylistic flair.

17 20. The Morrison Hotel was prominently featured on the cover of the acclaimed 1970
18 record album “Morrison Hotel,” by the Doors, the famous rock band from Los Angeles.
19 Legendary music photographer Henry Diltz took the photograph used on the cover. He has said,
20 “Out of all the covers I’ve done, that’s the one people remember immediately.”

21 21. Around that time, the late 1960s and early 1970s, the Morrison Hotel was evolving
22 into long-term affordable “single-room-occupancy” (“SRO”) housing for low-income tenants. The
23 building fulfilled that role for decades. Several lawsuits, including one brought by the L.A. City
24 Attorney’s Office, alleged unsafe and unsanitary living conditions for people at the Morrison
25 Hotel. Tenants were relocated, and the building became vacant around 2006.

26 22. Also in 2006, the Morrison Hotel’s 111 low-income housing units were listed as
27 needing to be preserved, under the settlement of the lawsuit styled *County of Los Angeles v. Jerome*
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1 *Wiggins*, Los Angeles County Superior Court, Case BC 276472 r/t BC 277539.

2 23. Starting around 2010, the Los Angeles Fire Department frequently used the
3 Morrison Hotel as a training site for firefighters.

4 24. As alluded to above, in 2018, the Relevant Group bought the Morrison Hotel and
5 adjacent land, with plans to erect at the site new tall buildings and to rework the Morrison Hotel,
6 yielding more than 500 luxury hotel rooms and high-priced apartment units. However, within a
7 few years, the Relevant Group ran into financial difficulties with the project.

8 25. Also in this time period, five-to-10 years ago, AHF is informed and believes, people
9 began occupying the Morrison Hotel for shelter and to avoid City “sweeps” of encampments of
10 people living on the streets.

11 26. The Relevant Group illegally gutted the interior of the Morrison Hotel in 2022. The
12 City did nothing to prevent that malfeasance.

13 27. In late 2023, the Relevant Group sold the Morrison Hotel to AHF. As noted above,
14 AHF’s goal was to restore the Morrison Hotel as low-priced SRO housing for low-income people.
15 AHF held a celebratory ceremony with John Densmore, the Doors drummer, and Mr. Diltz, the
16 photographer.

17 28. Los Angeles, particularly the neighborhood known as Skid Row, has suffered
18 increasing homelessness since the 1970s. Los Angeles was given the dubious title of
19 “homelessness capitol of the United States” in the 1980s. Los Angeles housing became the most
20 crowded in the United States in the 1990s. In 2005, the Los Angeles Housing Services Authority
21 (“LAHSA”) Greater Los Angeles Homeless Count found an estimated 48,103 people unhoused on
22 any given night in the City. In 2023, according to that same source, an estimated 46,260 people
23 were unhoused on any given night in the City.

24 29. In the midst of this homelessness crisis, Karen Bass became the City’s Mayor in
25 2022. On Mayor Bass’s first day in office, she launched “Inside Safe,” a program focused on
26 moving people living on the streets into taxpayer-subsidized transitional housing and then,
27 hopefully, into permanent housing. At a cost of about \$300 million, Inside Safe cleared over 140
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1 encampments of people living on the streets, and moved thousands of people into transitional
2 housing -- but 40 percent of those people never advanced beyond transitional housing and ended up
3 back on the streets, according to *The Los Angeles Times*.

4 30. Given the approach and infirmities of Inside Safe, AHF's idea to rehabilitate the
5 Morrison Hotel as permanent SRO housing for 111 people was vitally important.

6 31. AHF began the laborious, slow process of obtaining the necessary permits to
7 rehabilitate the Morrison Hotel. This work included seeking from the L.A. Police Department
8 ("L.A.P.D.") permission to station a security pod, motion lights, and cameras in or around the
9 building. And AHF removed debris and painted over graffiti.

10 32. Although L.A.P.D. proved unresponsive, AHF has taken other appropriate measures
11 to secure the Morrison Hotel. AHF has secured the Madison Hotel with gates, locks (including a
12 double-keyed deadbolt), the sealing of windows with metal sheets and anchors, and the welding or
13 nailing shut of unauthorized points of access.

14 33. AHF is informed and believes that people lacking AHF's consent to occupy the
15 building repeatedly occupied the building. Some of these people have taken extreme measures,
16 such as destroying locks, to try to get inside the building. AHF has had to repeat or to re-institute
17 security measures.

18 34. AHF is informed and believes that many of these people were unhoused, were
19 seeking shelter from the elements, and/or were avoiding Inside Safe clearances of encampments of
20 people living in the streets. (See, e.g. Jessie Chien, et al., "Criminalizing Homelessness:
21 Longitudinal Associations of Police Encounters and Homeless Sweeps with Psychosocial Health
22 Among the Unhoused Community in Los Angeles," *Social Science & Medicine* 393 (2026);
23 National Health Care for the Homeless Council, "Impact of Encampment Sweeps on People
24 Experiencing Homelessness," *Issue Brief* (Dec. 2022).) The City, not AHF, created the conditions
25 by which many people are unhoused and some may have sought unauthorized shelter at the
26 Morrison Hotel, despite AHF's adequate and ongoing security efforts.

27 35. On December 26, 2024, a huge fire erupted inside the Morrison Hotel. AHF is
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1 informed and believes that several dozen people were inside, although, fortunately, no one died or
2 was injured. More than 100 firefighters battled the blaze for an hour and a half and “knocked
3 down” the fire. The building was further damaged inside, although the sturdy exterior walls
4 remained standing.

5 36. Since the fire, the Morrison Hotel has remained vacant. AHF has continued to try to
6 rehabilitate the building as very affordable housing. AHF has continued to keep the building
7 secured.

8 **Unlawful, Abusive Government Actions Against AHF**

9 37. Without notifying AHF, on August 25, 2026, the Board held a hearing about
10 whether to deem the fire-damaged Morrison Hotel to be a public nuisance, under Los Angeles
11 Municipal Code section 91.8904.2. Not knowing about the hearing, AHF did not attend and for
12 that reason alone did not argue and provide evidence that the Morrison Hotel is not a public
13 nuisance. AHF is informed and believes that the Board orally voted, unanimously but erroneously,
14 to deem the Morrison Hotel a public nuisance.¹

15 38. To date, AHF has not seen any written documentation of the Board’s August 25,
16 2026, vote about the Morrison Hotel.

17 39. On or around September 29, 2026, LADBS posted at the Morrison Hotel a notice
18 ordering AHF, within one day, to provide there a human security guard 24 hours a day, 7 days a
19 week. This order is unnecessary and unreasonable and implicitly attempts to shift blame from the
20 City to AHF for the problems caused by numerous people living on the streets.

21 40. AHF is informed and believes that the City desires to demolish the Morrison Hotel,
22 rather than to allow the building to be rehabilitated, regardless of the effects on unhoused people in
23 the City.²

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25 ¹ In recent times, numerous building fires have raged on that same street, South Hope Street, where the Morrison Hotel
26 is located. This year, Fox 11 Los Angeles has broadcast two news stories by Matthew Seedorff about more than a
27 dozen fires right there. See [youtube.com/watch?v=flJOTiY6iA](https://www.youtube.com/watch?v=flJOTiY6iA) (“That is the fourth building on the block to go up in
28 flames”); and [youtube.com/watch?v=X5DsppUox5Q](https://www.youtube.com/watch?v=X5DsppUox5Q) (reporting that at least 10 fires had been started in the prior two
months).

² If the Morrison Hotel truly is structurally unsound and cannot be salvaged, then AHF would not insist on preserving

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1 requiring this Court to exercise its independent judgment in evaluating the record.

2 50. As the owner of the Morrison Hotel and the victim of abuse of procedures, AHF is
3 entitled to have reversed or at least stayed both (A) the Board's designation of the Morrison Hotel
4 as a public nuisance, under Los Angeles Municipal Code section 91.8904.2 or otherwise, and (B)
5 LADBS's order that AHF provide at the Morrison Hotel a human security guard 24 hours a day, 7
6 days a week, or similar.

7 **SECOND CAUSE-OF-ACTION: WRIT OF ADMINISTRATIVE MANDATE (CCP 1102)**

8 (Against All Respondents)

9 51. AHF realleges and incorporates by reference here all the allegations made above.

10 52. The Board failed to notify AHF of the August 25, 2026, hearing at which the Board
11 determined that the Morrison Hotel is a public nuisance, under Los Angeles Municipal Code
12 section 91.8904.2. No other Respondent gave notice, either. AHF was thereby denied the rights to
13 attend and to participate in the hearing.

14 53. The Board erroneously determined that the Morrison Hotel is a public nuisance,
15 under Los Angeles Municipal Code section 91.8904.2. The Morrison Hotel is not a public
16 nuisance.

17 54. With sufficient justification, on or around September 29, 2026, LADBS ordered
18 AHF, within one day, to provide there a human security guard 24 hours a day, 7 days a week. This
19 order is unnecessary and unreasonable and implicitly attempts to shift blame from the City to AHF
20 for the problems caused by numerous people living on the streets.

21 55. AHF is informed and believes that the City is attempting, quickly, unfairly, and
22 illegally, to move forward with having the Morrison Hotel demolished (and to make AHF pay for
23 the demolition).

24 56. In each of these actions, Respondents, and each of them, failed to proceed in the
25 manner required by law and denied AHF a fair hearing or trial.

26 57. In each of these actions, Respondents, and each of them, committed prejudicial
27 abuse of discretion against AHF, in that no decision is supported by the findings and the findings
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are not supported by law.

58. AHF has no plain, speedy, and adequate remedy at law for the circumstances and events complained of herein; administrative writ relief is the only available remedy.

59. AHF's fundamental rights, of ownership and use of real property, are involved, requiring this Court to exercise its independent judgment in evaluating the record.

60. As the owner of the Morrison Hotel and the victim of abuse of procedures, AHF is entitled to have arrested or prohibited the proceedings of the Board in designating the Morrison Hotel as a public nuisance, under Los Angeles Municipal Code section 91.8904.2, or otherwise, and the proceedings of LADBS in ordering that AHF provide at the Morrison Hotel a human security guard 24 hours a day, 7 days a week, or similar.

61. AHF is further entitled to have this Court issue an order to Respondents, and each of them, to desist or to refrain from further proceedings of the Board in designating the Morrison Hotel as a public nuisance, under Los Angeles Municipal Code section 91.8904.2, or otherwise, and the proceedings of LADBS in ordering that AHF provide at the Morrison Hotel a human security guard 24 hours a day, 7 days a week, or similar, .

PRAYER

Wherefore, AHF respectfully prays as follows:

1. Under the First Cause-of-Action, that a peremptory writ of administrative mandate issue from this Court commanding Respondents, and each of them, to set aside their above-described decisions adverse to AHF.

2. Alternatively, under the First Cause-of-Action, that the Court by writ stay the above-described decisions adverse to AHF.

3. Under the Second Cause-of-Action, that a peremptory writ of administrative prohibition issue from this Court prohibiting Respondents, and each of them, from holding further proceedings on the above-described decisions adverse to AHF.

4. Under both causes-of-action, that this Court award AHF its costs of suit herein, including out-of-pocket expenses and reasonable attorney fees.

1 5. Under both causes-of-action, that this Court grant AHF such other, further, or
2 different relief as the Court deems just and proper.

3 Respectfully submitted,

4 Date: October 7, 2026

AIDS Healthcare Foundation

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7 Thomas A. Myers

Jonathan M. Eisenberg

8 Attorneys for Petitioner AIDS Healthcare Foundation
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VERIFICATION

I, Mark Dyer, am Vice President of Operations – Corporate Real Estate, Housing & Facilities, at AIDS Healthcare Foundation, Petitioner in the above-entitled lawsuit. I am an authorized representative of AHF for purposes of the lawsuit. I have read the foregoing Verified Petition for a Writ of Mandate and Other Relief. I know the contents thereof to be true of my own knowledge, except as to those matters that are alleged on information and belief, and I believe those matters to be true.

I declare under the penalty of perjury under the laws of State of California that the foregoing is true and correct, and that I signed this declaration on October 7, 2026, at Los Angeles, California.



Mark Dyer