

IN THE MATTER OF HACIENDA CORONA NIGHT CLUB

COUNCIL FILE NO. 13-1230

CASE NO. DIR 2012-3583(RV)

PLUM HEARING

NOVEMBER 18, 2013

Scott Wellman

Wellman & Warren, LLP

Attorneys for Hacienda Corona

SCOPE OF THE APPEAL

The scope of this appeal is very limited. It is only as to a part of two conditions (10b and 18a) imposed by the Zoning Administrator ("ZA"). These conditions constitute only two subsets of the twenty-one conditions imposed by the ZA. Of note, is that condition 10b was part of the "General Conditions Suggested" by the LAPD and therefore do not appear to be part of the core conditions desired by the LAPD. The reason that only these two conditions are part of the appeal is because of their significant economic effect on the business as explained below.

THE TWO CONDITIONS

The first condition (10b) reads as follows:

"At no time shall patrons be permitted to self-service of beverages or engage in activity which is referred to as (bottle, bucket, pitchers or box service.) This shall include bottles 175 ml or larger. Beverages shall not be sold in multiple containers. Beverages must be served by employees of the bar only."

The appellant agrees with the no self-service limitation and the requirement that beverages be served by employees of the bar only. It is only the prohibition on bottle/bucket service that the appellant objects to. This is because 56% of all the sales of the club come from these services. Attached as Exhibit "1" is a daily log for the last month of the sales supporting that 56% of the sales come from bottle/bucket service. Prohibiting these services would have a devastating effect on the club and be tantamount to a closure order.

The second condition (18a) reads as follows:

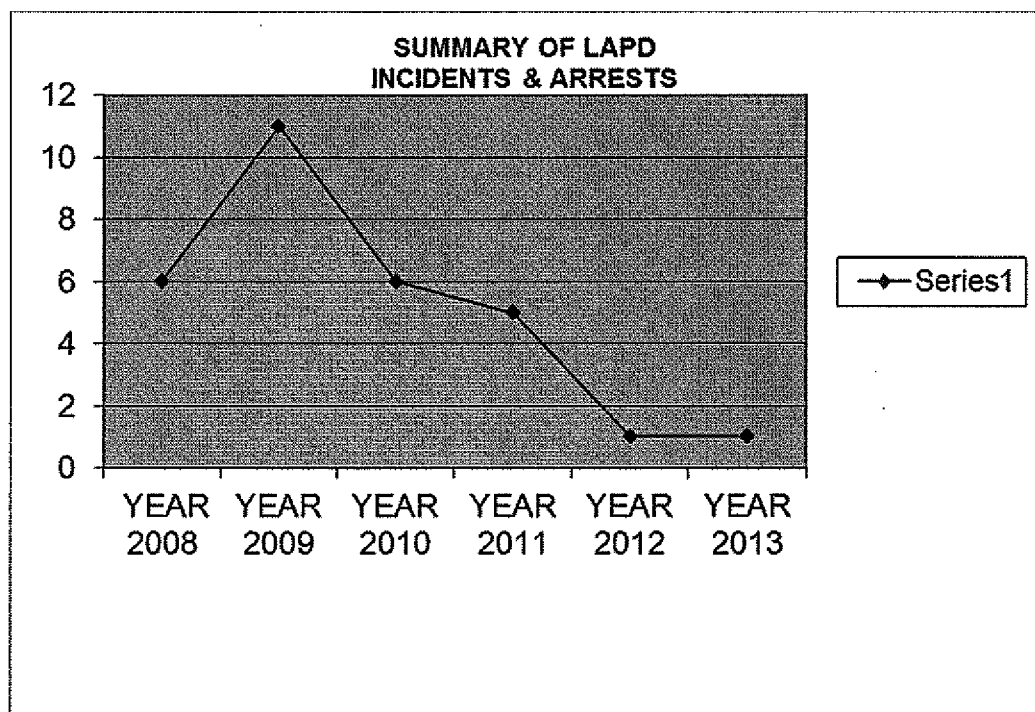
"Free valet parking shall be provided to patrons of the business. A valet ticket shall be issued to all patrons who utilize the valet service and a portion of the valet ticket shall be presented at the door to enable entrance to the business/bar. Patrons shall be encouraged not to park in residential neighborhoods."

The club does provide valet service and will comply with the Los Angeles Valet Parking law. However, a small fee needs to be charged. The reason for this is that the club leases a parking lot across the street in its effort to discourage parking in the neighborhood. The valet charge is necessary to cover this cost.

PAST SUCCESSFUL EFFORTS TO ABATE THE NUISANCE

The appellant admits that in the past there were gang elements that attended the club. However, during the past several years the management has worked hard to eliminate this element and any crime associated with the club. The success of their efforts is proven by the significant reduction in incidents and arrests reported by the LAPD. The table below summarizes by year the incidents and arrests as contained in the Staff Report accompanying this matter:

YEAR 2008	YEAR 2009	YEAR 2010	YEAR 2011	YEAR 2012	YEAR 2013
6	11	6	5	1	1



Moreover, the last incident occurred in January of 2013 so that it has been almost a year since any incident has occurred. This significant improvement is the result of the efforts that the management has taken which include, among others, the following:

1. Fencing in the parking lot on site.
2. Leasing the parking lot across the street.
3. Changing the security service to a new, more professional service.

4. Increased security guard presence which monitors both the inside and the outside of the club.
5. Institution of a security patrol for the neighborhood.
6. Institution of a dress code which prohibits gang type clothing such as baggy pants and gang colors.
7. Surveillance camera system.
8. New lighting.
9. Cleanup of the outside landscaping and exterior walls.
10. Posting of no parking signs on neighborhood streets and in the club
11. Institution of a taxi program for patrons

Although these efforts have resulted in substantial success, the appellant is willing to do more and would welcome a chance to sit down with the LAPD to discuss its ideas.

THE MAIN POINT, HOWEVER, IS THAT THE APPELLANT SHOULD NOT BE PUNISHED FOR DOING THE RIGHT THING IN MAKING EFFORTS WHICH HAVE SUCCEEDED. INSTEAD, THE APPELLANT SHOULD BE ENCOURGED TO DO MORE, IF NECESSARY. IT WOULD BE SENDING THE WRONG MESSAGE TO TELL ONE THAT IT DOES NOT MATTER WHAT ONE DOES TO REMEDY A PROBLEM AS THE CITY WILL STILL IMPOSE PUNISHMENT.

SUPPORT FOR THE CLUB

Attached as Exhibit "2" are twenty-five declarations from residents and businesses in the neighborhood. In part, each of these declarations make the following statement:

"I have no current complaints about the nightclub. There may have been issues in the past, but it is clear that the nightclub owners have worked hard to eliminate these issues. The ownership should be commended for the efforts it has undertaken, as it has been a year or so since any problem relating to the nightclub has occurred...The nightclub has been a vital part of our community for many years, provides jobs to our community and should not be force out of business because of a few incidents that happened long ago."

The management in this largely Hispanic neighborhood seeks to be involved in community outreach to help better its community. Many of the neighbors appear outraged that the City is "picking" on one its businesses. Apart from this, it is clear that the appellant enjoys significant support from the community and imposing conditions that would be tantamount to closing the club is not supported by the community.

THE CONDITIONS ARE ILLEGAL AND MAY SUBJECT THE CITY TO LIABILITY

There are at least two independent reasons why the conditions are illegal and unenforceable. First, the conditions improperly interfere with the exclusive authority of the California Alcoholic Beverage Control. Second, these prohibit conditions do not satisfy the constitutional requirements for abating a nuisance.

A. The State of California Preempts the City's Authority to Impose the Condition.

The California Constitution assigns to the state the right to regulate alcohol and the State Department of Alcoholic Beverage Control ("ABC") preempts local rules regulating alcohol sale:

"[t]he Department of Alcoholic Beverage Control shall have the exclusive power . . . to license the manufacture, importation and sale of alcoholic beverages in this State, and to collect license fees or occupation taxes on account thereof." (Cal. Const. art. XX, § 22(d).) "Under article XX, section 22 the 'sale, use and possession of alcoholic beverages is exclusively a matter of state concern and . . . the state will not tolerate local action with respect thereto.'" (*City of Rancho Cucamonga v. Warner Consulting Services, Ltd.* (1989) 213 Cal.App.3d 1338, 1343.)

Although the City has the right to issue conditions to abate a nuisance, this right does not extend to regulations related to the sale of alcohol. However, condition 10b directly affects the sale of alcohol to a willing purchaser, and, in fact, if adopted will reduce the sale of alcoholic beverages by almost 60%. Such a regulation lies within the exclusive province of the ABC. Adoption of such a condition may lead to liability on behalf of the City.

B. The Conditions Violate the Constitutional Requirements for Abating a Nuisance.

In imposing the conditions, the ZA acknowledged that it "has no direct authority to regulate or enforce conditions assigned to alcohol sales or distribution." (See AZ's Modification of Operating Conditions at p. 35). However, the ZA sought to impose these conditions under its authority to abate a public nuisance.

Imposing prohibitory conditions to abate a public nuisance must satisfy the constitutional requirements for imposing such conditions. Among others, these requirements are as follows:

1. "[E]ach individual in a community must put up with a certain amount of annoyance, inconvenience and interference and must take a certain amount of risk in order that all may get on together." *Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1105. In other words, the interference must be substantial and unreasonable, and an interference

that does not constitute an "intolerable," "real and appreciable invasion" to the community does not meet the requirement. *Ibid*

2. The interference must be an ongoing, present danger to "an entire *community or neighborhood*," or a considerable number of people. *Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1104.
3. The prohibitions must be no more "than necessary to serve a significant public interest." *Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.

Here, there have been no incidents for almost a year. Moreover, there have been almost no incidents during the past two years. There is simply no showing of any present, ongoing interference or danger to the community. Nor is there a showing of a nexus between the alleged nuisance and the conditions to be imposed.¹

There is also no showing that the entire community is affected by the alleged interference. The LAPD referred to isolated complaints of bottles found in the streets or urination on a front lawn. Although this activity is unacceptable it is isolated which is shown by the considerable amount of support shown by the surrounding community for the club.

Finally, imposing conditions that are tantamount to a closure order is overkill. There are other, less restrictive mitigating factors that can be imposed to address and resolve the alleged problems. In short, imposing these conditions may subject the City to liability.

THE INTERESTS OF THE CITY

The Appellant fully acknowledges that the City has a strong interest in promoting the safety and public welfare of the community. The Appellant agrees with this interest and itself believes that it has a duty to promote the safety of the community. However, the two conditions sought to be imposed will have the effect of closing down the club. There are alternative ways to meet the interest of the City while still allowing the club to stay open. The Appellate would welcome the opportunity to sit down and discuss these alternatives with representatives of the City. A few of the ideas are the following:

1. A new, state of the art surveillance system.

¹ The PLUM is directed to the Appellants brief and analysis filed with the ZA. This analysis is a part of the record and will not be repeated here. The analysis showed a lack of any nexus between the incidents reported by the LAPD and the alleged nuisance to be abated.

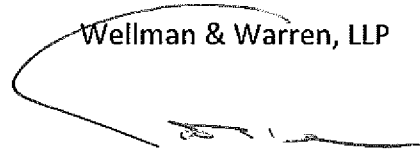
2. Allowing bottle/bucket service only in designated (VIP) areas which will receive heightened monitoring by security.
3. Removing immediately those who are obviously intoxicated and placing them into a taxi pursuant to the club's taxi program.
4. Meeting with the LAPD on a periodic basis (e.g. quarterly) to discuss any outstanding issues concerning the club and any improvements to be made.

REQUEST FOR CROSS-EXAMINATION

It is the Appellant's understanding that the LAPD and perhaps other City officials may provide testimony at the hearing. If this is the case, then the Appellant requests the right to cross-examine these witnesses.

Respectfully submitted: November 17, 2013

Wellman & Warren, LLP



Scott Wellman

Attorneys for Appellant

9/20/2013

Bottles & Buckets - 1668.00
Others - 1430.00

9/21/2013

Bottles & Buckets - 5045.00
Others - 2262.00

9/22/2013

Bottles & Buckets - 1561.00
Others - 658.00

9/23/2013

Closed

9/24/2013

Bottles & Buckets - 1416.00
Others - 2992.00

9/25/2013

Closed

9/26/2013

Bottles & Buckets - 1600.00
Others - 773.00

9/27/2013

Bottles & Buckets - 1912.00
Others - 1337.00

9/28/2013

Bottles & Buckets - 3956.00
Others - 1562.00

9/29/2013

Bottles & Buckets - 2613.00
Others - 527.00

9/30/2013

Closed

10/01/2013

Bottles & Buckets - 2050.00

Others - 1007.00

10/02/2013

Closed

10/03/2013

Bottles & Buckets - 2312.00

Others - 1234.00

10/04/2013

Bottles & Buckets - 2268.00

Others - 1640.00

10/05/2013

Bottles & Buckets - 2528.00

Others - 1831.00

10/06/2013

Bottles & Buckets - 1440.00

Others - 939.00

10/07/2013

Closed

10/08/2013

Bottles & Buckets - 1060.00

Others - 820.00

10/09/2013

Closed

10/10/2013

Bottles & Buckets - 1798.00

Others - 415.00

10/11/2013

Bottles & Buckets - 12079.00

Others - 1380.00

10/12/2013

Bottles & Buckets - 4210.00

Others - 1959.00

10/13/2013

Bottles & Buckets - 1128.00

Others - 963.00

10/14/2013

Closed

10/15/2013

Bottles & Buckets - 1139.00

Others - 340.00

10/16/2013

Closed

10/17/2013

Bottles & Buckets - 1214.00

Others - 485.00

Bottles & Buckets Total - 53,097.00

Others Total - 24,554.00

I live in [have a business in] the community surrounding the Hacienda Corona nightclub. I have no current complaints about the nightclub. There may have been issues in the past, but it is clear that the nightclub owners have worked hard to eliminate these issues. The ownership should be commended for the efforts it has undertaken, as it has been a year or so since any problem relating to the nightclub has occurred. I am told that certain neighbors complained of problems such as intoxicated persons urinating in the neighborhood and creating noise, and harming shrubs and flowers. These were isolated incidents that were not indicative of the patrons at the nightclub as most are respectful, law abiding citizens. More importantly, I have seen none of these problems in at least a year. The nightclub has been a vital part of our community for many years, provides jobs to our community and should not be forced out of business because of a few incidents that happened long ago.

Date: 10-30-13Signature: *Julio G. Gise*Address: 6330 Simpson Ave #1

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Direccion: _____

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Date: 10-30-13Signature: Felix RayAddress: 6330 Simpson Ave #2

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date: 10/28/13

Signature: [Handwritten Signature]

Address: 6335 SIMPSON AVE

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Fecha: 10-28-13Firma: 6338 YL SIMPSON AVDireccion: ALFONSO GIRON

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Date: 10-28-13Signature: Address: 6315 Simpson Ave

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Date : 10-28-2013

Signature: 

Address: 6345 SIMPSON AVE N HOLLYWOOD CA 91606

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Date:

10/28/14

Signature:

Don Parker

Address:

6320 SIMPSON Ave, North 91606

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Fecha: 10/30/13

Firma: 

Direccion: 6330 SIMPSON AVE # 1

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Date: 10-29-13

Signature: _____

Address: 6330 SIMPSON AVE #2

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Firma: _____

Dirección: _____

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Date: 10/21/2013Signature: Juan MunozAddress: 6331 Lankershim Blvd. North CA 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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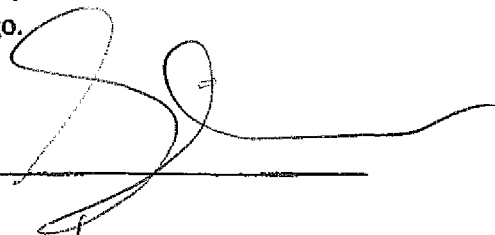
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Date:

10/21/13

Signature:



Address:

6325 Lakeshore Blvd. N.H. - CA 91605

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date: 10/14/13Signature: BOB 10/14/13Address: 6333 LANKERSHIM BLVD NO-HO CA 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date: 10/17/13Signature: Treddy S. S.Address: 6323 COLFAX AVE. NO. HOLLYWOOD CA 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date: 10-18-13Signature: Carol LynnAddress: 11702 Victory Blvd. N.H.

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

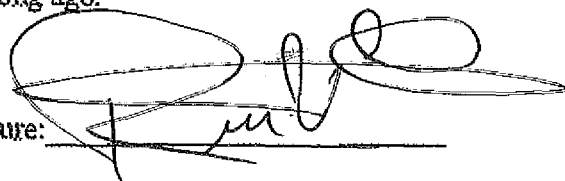
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Date : 10/22/13

Signature: 

Address: 11717 1/2 Victory B No Hollywood CA

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date : 10-22-13

Signature: Rudolf Kiderl

Address: 11719 Victory Bl N.H CA 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

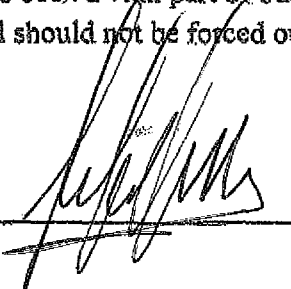
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Date: 10/22/13

Signature: 

Address: 11727 Victoria Pl. N.H., CA 91106

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Date: 10/21/13

Signature: Maria Alvarado

Address: 11664 Victory Bu North Hollywood
Ca 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

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Fecha: 10-21-13Firma: Dirección: 11705 VICTORY BLVD.

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Fecha: 10/20/13Firma: Ma. Guadalupe BirruetaDireccion: 11665 Victory BL No Hollywood CA

91605

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Fecha: 10-21-13Firma: Rafael PerezDireccion: 6427 Lanier Street Bl.N. Hollywood CA 91606

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Date: 10/21/13

Signature: EDUARDO RANGEL

Address: 6417 LAOKERSHIM BLVD NHI CA 91606

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Dirección: _____

I live in [have a business in] the community surrounding the Hacienda Corona nightclub. I have no current complaints about the nightclub. There may have been issues in the past, but it is clear that the nightclub owners have worked hard to eliminate these issues. The ownership should be commended for the efforts it has undertaken, as it has been a year or so since any problem relating to the nightclub has occurred. I am told that certain neighbors complained of problems such as intoxicated persons urinating in the neighborhood and creating noise, and harming shrubs and flowers. These were isolated incidents that were not indicative of the patrons at the nightclub as most are respectful, law abiding citizens. More importantly, I have seen none of these problems in at least a year. The nightclub has been a vital part of our community for many years, provides jobs to our community and should not be forced out of business because of a few incidents that happened long ago.

Date: 10-21-13Signature: Address: 11702 1/2 Victoria Blvd 91606

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

Fecha: _____

Firma: _____

Dirección: _____

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Date: 10/20/13Signature: Emily DiazAddress: 6345 Smson ave No Ho CA 91606

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Date: 10/21/13 Signature: [Handwritten Signature]

Address: 6335 Parkes Lane Blvd. North Hollywood
91606 Agustin Torres

Yo vivo en [tener un negocio en] la comunidad que rodea el salón de baile Hacienda Corona. Yo no tengo quejas actuales sobre el salón de baile. Puede que haya habido problemas en el pasado, pero está claro que los dueños del club nocturno han trabajado duro para eliminar estos problemas. La propiedad debe ser felicitada por los esfuerzos que ha llevado a cabo, ya que ha sido un año más o menos desde que se produjo algún problema relativo a la discoteca. Me han dicho que algunos vecinos se quejaron de problemas como personas intoxicadas orinan en el barrio y la creación de ruido y daños a los arbustos y flores. Estos fueron incidentes aislados que no eran indicativos de los clientes de la discoteca pues la mayoría son respetuosos y ciudadanos respetuosos de la ley. Más importante aún, no he visto a ninguno de estos problemas en por lo menos un año. La discoteca ha sido una parte vital de nuestra comunidad por muchos años, da trabajo a nuestra comunidad y no debe ser forzada a la quiebra debido a algunos incidentes que sucedieron hace mucho tiempo

Fecha: 10/21/13 Firma: [Handwritten Signature]

Dirección: 6335 Parkes Lane Blvd
N. Hollywood ca 91606