to commercial and residential projects. Mr. Lambert's strong belief in collaboration has been widely recognized by community leaders and local agencies, most recently earning him a Gold Nugget Award for the first live/work artists' lofts in Santa Monica.As former and current President of Action Apartment Owners Association serving his third term and as a Director of both the local and statewide Apartment Owners Associations; Mr. Lambert's knowledge and accomplishments benefit clients and their properties throughout the Westside, providing creative solutions to the challenges of rent control and land use issues. His work with both local and state government regulators has been instrumental in the adoption of vacancy decontrol legislation. He currently writes a column for the Westside Apartment Monthly magazine.In addition to his Westside business ventures,

From: Ellia Thompson [mailto:ethompson@sklarkirsh.com]
Sent: Saturday, March 28, 2015 5:30 PM
To: Carl
Lambert; bungejose@yahoo.com; tnitti@prodigy.net; ann@generalrealestate.net; georgeb@anotek.com
Subject: Re: Zoning change

Carl,

That is fantastic. Thanks for being our bird dog!

Dana and I are both on vacation this week, but I will reach out to Chris and Tricia early next week. (City is closed on Monday for Cesar Chavez)

We need to work out the logistics with the Council office and have them force Housing to back off. If for any reason, Housing won't listen, the City Attorney will.

Thanks again Carl. I'll let you all know when I hear back from the Council office.

From: Carl Lambert [mailto:carl@lambertinc.com]
Sent: Saturday, March 28, 2015 07:21 PM
To: Ellia Thompson; 'bunge, Jose' <bungejose@yahoo.com>; tnitti@prodigy.net <tnitti@prodigy.net>; Ann Everest <ann@generalrealestate.net>; 'georgeb@anotek.com' <georgeb@anotek.com>
Subject: Zoning change

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Elia, What are the next steps to get it moving.

Best, Carl

Carl J. Lambert
President
Lambert Investments, Inc.
5 Westminster Avenue, Suite 101
Venice, California 90291
(310) 453-9656
Fax (310) 829-6288
Cell (310) 663-6030
Carl@Lambertinc.com
BRE 00860625

Carl Lambert on a Venice BID in 2013- Ocean Front Committee, Venice Neighborhood Council

Lambert: 3.45. …cleaning up the end to the pier there. I mean we need some money there. And at first they wouldn't do that at Pico because nobody cared about Ocean Park. Well a couple of hotels came in and all of a sudden they cared about Ocean Park. And that got cleaned up because the smell used to be there all the time.

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Lambert: 4.20….we need to co-ordinate our troops. We get a lot of different organizations all talking about the boardwalk. get Bonin & Bill…...

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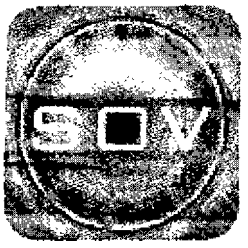

SPIRITOFVENICE
Published on Oct 31, 2015

Item 17 a

Coastal Commission Hearing November 4, 2015

October 28, 2015

California Coastal Commission
South Coast District Office
200 Oceangate - Tenth Floor
Long Beach, CA 90802

Via email to: Zach.Rehm@coastal.ca.gov

Re: **Opposition to CDP Application #5-14-1932, 2 Breeze Ave, Venice**

Dear Coastal Commissioners:

It is unfortunate that the Commission has allowed the Applicant to manipulate a public hearing process to secure a hearing date that cannot be further continued from a location that is over 400 miles away from the community that is subject to the consequence of the Commission's determination. Were this hearing in Southern California, the hearing room would be filled with Venice residents who would urge you to deny this application for the following reasons, as do the undersigned community organizations whose members are not able to make the journey to Half Moon Bay.

I The Project Would Prejudice the Ability of the City to Prepare a Local Coastal Program in Conformity with the Policies of the Coastal Act

The City of Los Angeles is the only coastal community in California to undertake to issue coastal development permits pursuant to Section 30600(b) of the Coastal Act (Public Resources Code § 30000, et seq.). Section 30604 of the Coastal Act requires:

> "Prior to certification of the local coastal program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with Chapter 3 [of the Coastal Act] (commencing with Section 30200) and that the permitted development will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with Chapter 3 (commencing with Section 30200)."

Section 30604 mandates that "no coastal development permit be issued which would prejudice the local government's ability to prepare a LCP in conformity with the [Coastal] Act." (Sierra Club v. Superior Court (1985) 168 Cal.App.3d 1138, 1142.) The Coastal Staff Report's recommended Finding of no prejudice to LCP preparation is inadequate. It is myopically focused and *based solely on proposed conditions to mitigate public access impacts of the project* itself, and is without regard to the impact of the

project on the community character of Venice as a Special Coastal Community. The Coastal Act states that, " 'cumulative effect' means the incremental effects of an individual project shall be reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The Finding of no prejudice ignores the larger context in which this project, one of many undertaken by the Applicant that illegally converts critically sited residential neighborhood housing to commercial hotel use, *passes the tipping point in destroying socially-diverse Venice neighborhoods that the Commission stated should be protected when it certified the Venice Land Use Plan (LUP).* (*See* LUP Policy I. E. 1. "Venice's unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976.")

It bears emphasis that the neighborhood protection policies in the LUP are rooted in Section 30253(e) of the Coastal Act, which sets forth a coastal policy that requires that new development "protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses." The "Introduction" to the Chapter II Land Use Policies of the LUP makes clear that Venice is a Special Coastal Community because of the social, ethnic, and economic diversity of its residential neighborhoods:

> Developed as a beach resort, Venice was known as the Coney Island of the Pacific. Historically it has attracted people from all social and ethnic groups to the coast to live, work and play. While little remains of the "Venice of America" that was built by Abbot Kinney, Venice is still strongly influenced by its past. *Each weekend hundreds of thousands of people are still attracted to the shore to enjoy the ambience of this coastal community*. Kinney envisioned Venice to be more than a resort and today it is home to 32,270 permanent residents, many of whom inhabit the small summer homes built on substandard lots along paved streets over canals. Others live on substandard lots (many are less than 3,000 square feet in area) that have been redeveloped with more substantial single-family homes and multi-unit structures. Yet Venice remains the quintessential coastal village where people of all social and economic levels are able to live in what is still, by Southern California standards, considered to be affordable housing. *Diversity of lifestyle, income and culture typifies the Venice community.* United by the term Venetians with all its connotative meanings, Venice is really a group of identifiable neighborhoods with unique planning and coastal issues. (LUP, p. II-1.)

Moreover, the first three bullets in the LUP's Summary of Venice Coastal Issues related to "Residential Land Use and Development," on p. I-3, make clear that preservation of the diversity of Venice's residential community is essential in protecting it as a Special Coastal Community pursuant to the Chapter 3 Policies of the Coastal Act. These include:

- Preservation of existing housing stock, and discouragement of conversion of residential uses to commercial use where appropriate.

- Provision of very low, low, and moderate-income housing for a cross- section of the population, including persons with special needs.

- *Illegal conversion of residential uses to commercial uses* and illegal provision of residential uses.

It is the diversity of our residential coastal community that makes Venice a Special Coastal Community. It is our unique, eclectic mix of families, artists, and residents of all colors and walks of life that make Venice a world-famous destination. Our community, its character, and its characters, *depends on a balance between visitor-serving accommodations and permanent residential units*. But that balance would be substantially compromised given the current and cumulative effects of a high-impact project like 2 Breeze. As set forth below, it is just one of five buildings that have been illegally converted by this Applicant alone. And, Mr. Lambert's illegal conversions are part of a larger onslaught of displacement of community residents as a result of illegal conversions to hotel and short-term rental commercial uses.

We respectfully submit that the "no prejudice to the LCP" Finding cannot be made here once this project is placed in context. To mechanically approve in isolation the conversion of a yet another neighborhood residential building to commercial use takes us way too far down the proverbial "slippery slope." If our residential communities continue to be driven towards extinction due to conversion of housing to hotel and short-term rental commercial uses, the goal of Coastal Act Section 30253(e) and its Policy I. E. 1. counterpart in the LUP *will be forever undermined* – the very prejudice to the LCP planning process that the Coastal Act mandates be avoided.

A. 2 Breeze is just one of many **illegal** conversions of residential dwelling use **to hotel and short-term rental** commercial **use by the Applicant.**

The following is a list of apartment buildings that the Applicant has unlawfully converted to hotel/short-term rental commercial uses. He is either the current or former owner of all these properties. The Applicant has never before sought a CDP from this Commission for any of these conversions. He should not now be rewarded for finally seeking forgiveness when he never previously first sought permission.

1. Venice Suites (32 RSO units*)
Address: 417 Ocean Front Walk
Current Owner: Carl Lambert *http://www.venicesuites.com*

2. Originally: Paloma Suites
Now: Venice Beach Vacation Condos (8 RSO units*)
Address: 52 E Paloma Ave
Current Owner: Tayfun King
Previous Owner: Carl Lambert
Current website: *http://venicebeachvacationcondos.com*
Previous website: *http://www.venicepalomasuites.com*

3. Venice Breeze Suites (31 RSO Units*)
Address: 2 Breeze Ave--subject property
Current Owner: Carl Lambert *http://www.venicebreezesuites.com*

4. Venice Beach Waldorf (32 RSO Units*)
Address: 1217 S Ocean Front Walk/5 Westminster Ave
Current Owner: Carl Lambert
Previous Owner: Lenney LLC *http://www.venicebeachwaldorf.com*
Yesterday's rent-stabilized Venice homes are today's chic hotel.
About two years ago, Lambert Management took over the responsibilities of managing the Waldorf apartments. Since then, Lambert has purchased the property, and more than half of the 32 long-term rental units disclosed in the latest Certificate of Occupancy have been converted to short-term rental units.

5. Venice Admiral Suites (25 RSO units*)
Address: 29 Navy St
Current Owner: Not publicly available
Previous Owner: Carl Lambert *http://www.veniceadmiralsuites.com*

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* RSO units: Rental Units protected by the City of L.A. Rent Stabilization Ordinance

B. **The Lambert conversions are part of a larger phenomenon that is degrading and *cumulatively changing Venice's unique character-defining residential neighborhoods*.**

As of today, there are 1,207 entire homes and apartments and 333 private rooms from Venice listed on AirBnB, and approximately 1,000 more listed on 30 other marketing platforms. Enclosed is an Airbnb map that shows the location of those 1,540 listings, almost all of which are located in the Venice Coastal Zone and most of which are located on or near the Ocean Front Walk where the Applicant's property is located.

C. **The balance between commercial and residential dwelling uses would be essentially destroyed by approval of this project.**

As Coastal Staff indicates, the subject property is within the LUP's Community Commercial land use designation. And, *while overnight visitor-serving uses can be a preferred use in certain circumstances, in the cumulative context of the many past, current and future conversions of residential dwelling use to* short-term hotel and rental unit commercial uses in the Venice Coastal Zone, *it is not* a preferred use due to the adverse cumulative impact of the conversions on the balance between the commercial and residential dwelling uses.

Policy I. B. 6 of the *LUP seeks a balance between residential dwelling uses and visitor-serving commercial uses.* It states in its pertinent part:

> The areas designated as Community Commercial on the Land Use Policy Map (Exhibits 9 through 12) will accommodate the development of community-serving commercial uses and services, with a mix of residential dwelling units and visitor-serving uses... ***The existing community centers*** *in Venice are most consistent with, and* ***should be developed as, mixed-use centers that encourage the development of housing in concert with multi-use commercial uses.*** The integration and mixing of uses will increase opportunities for employees to live near jobs and residents to live near shopping.

As the facts demonstrated above make clear, the rampant illegal conversion of residential dwelling units into hotel and short-term rental commercial uses is changing the fabric of Venice's unique coastal community and is doing so at a scale and rate that requires the attention of this Commission in order to prevent prejudice of the City's ability to prepare a LCP that implements the certified LUP's Policies and reflects its commitment to preserve and protect Venice's unique (mainly) residential community character.

It is noteworthy that LUP Policy I.A.17 presages our concern about the loss of permanent rental housing. It states:

> "To preserve existing rental housing stock and prevent conversion of permanent rental housing to youth hostels, the LIP may set forth a maximum number of youth hostel units (based on a percentage of total number of existing rental units) permissible in the Venice Coastal Zone."

At the time of the LUP's certification in 2001, its ***drafters were concerned about the impact a relatively small number of youth hostels might have on the residential community***. They could not foresee or even imagine the extent of the loss of rental housing stock in the Venice Coastal Zone that has been converted and is being proposed for conversion to hotel and short-term rental commercial uses.

And finally, the Coastal Act's Legislative Findings and Declarations; Goals note the importance of balanced coastal resources in Section 30001.5(b), which states:

> "The Legislature further finds and declares that the basic goals of the state for the coastal zone are to assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state."

D. The Coastal Staff Report fails to inform the Commission that ***the City and the Venice Neighborhood Council have recognized the need to stop conversions*** of residential housing to commercial uses, **such as hotels and short-term rental** units.

In support of its recommendation to grant the State coastal development permit, Coastal Staff cites support of former 11th District Councilmember Bill Rosendahl and the Venice Neighborhood Council. ***However, this support was solicited almost three years ago, long***

before the avalanche of illegally converted hotels and short-term rentals that is now threatening to destroy the unique character of our protected, coastal residential neighborhoods and rob our City of desperately needed rental housing, including low-income rental housing. Current Councilmember Mike Bonin opposes the conversion of ANY rental units subject to regulation by the City of L.A. Rent Stabilization Ordinance to hotel and short-term rental commercial uses. Enclosed with this letter is a copy of the motion that Councilmember Bonin introduced on June 2, 2015 that commits to preparing a City ordinance governing short-term rentals in the City of Los Angeles. And on September 15, 2015, after a lengthy process including several committee reviews and local community Public Hearings, the Venice Neighborhood Council adopted a Motion in support of Councilmember Bonin's city-wide motion, which offers 20 additional suggestions for strengthening the ordinance to regulate and limit the proliferation of short-term rentals Citywide, including and especially in Venice. A copy of that motion is also enclosed.

II. The City Has Incorporated Mello Act Compliance into its LUP and Has Failed to Comply with its Requirements.

As previously argued in the July 13, 2015 letter to the Commission from the Venice Community Housing Corporation, a copy of which is attached for your convenience, the Commission may consider the requirements of the Mello Act in reaching its decision. In making this argument, we recognized that the Coastal Act was amended in 1981 to eliminate provisions encouraging affordable housing for persons of low and moderate income. We asserted, as acknowledged in the Commission's February 10, 2015 "Report on Coastal Act Affordable Housing Policies and Implementation," *that nothing precludes cities from submitting LUPs that include affordable housing policies and Mello Act compliance requirements*. Because the City of L.A. included Mello Act compliance requirements in its certified LUP, it is those LUP Policies that guide the Commission in this case. Mr. Steven Kaufmann's letter of September 2, 2015, misses this critical point.

In brief, because the LUP specifically requires compliance with the affordable housing requirements of the Mello Act, *there must be compliance with the threshold requirement that a conversion of residential use to commercial use may be permitted only where the commercial use is coastal dependent or, if the conversion is to a non-residential use that is not coastal dependent, it is first determined that residential use is no longer feasible at that location. Because the City did not in its Mello Act Compliance Determination consider or make any factual determination regarding the feasibility of continued residential use*, the Commission should either remand the matter to the City to make that Finding or *deny the application because the Finding has not been made*. Alternatively, the Commission should *deny the application because it is obvious that continued residential use is feasible.* The Applicant admits that each of the 31 units could be rented for between $3,000 and $4,000 per month, or up to $1,488,000 per year.

While the Applicant states he has invested $4 million in improvements in the subject property and preserved architectural character, he would have had to make that

investment to preserve the building in any case. Moreover, that investment addresses only the architectural diversity element in Policy I.E.1, *and not the requirement stated therein to protect and preserve the unique social diversity of our Special Coastal Community*.

III Conclusion

As a petition circulating in our community states, our friends, families, and neighbors are being replaced by lockboxes, cleaning crews, loud parties, and neighborhoods of strangers. Tenants are facing harassment, evictions, and offers to move out quickly for cash. ***This phenomenon is destroying the very character of Venice that makes it a destination in the first place.*** *The responsibility for ensuring that the LCP planning process is not prejudiced falls in the first instance on the shoulders of this Commission.* For all of the reasons above, *we ask you to reject this conversion from residential to non coastal-dependent commercial hotel use*.

Respectfully submitted,

Coalition for Economic Survival (CES)
http://www.cesinaction.org

Keep Neighborhoods First (KNF)
http://www.keepneighborhoodsfirst.com

Los Angeles Alliance for a New Economy (LAANE)
http://www.laane.org

People Organized for Westside Renewal (POWER)
http://www.power-la.org

UNITE HERE Local 11
http://www.unitehere11.org

VENICE ACTION ALLIANCE
http://veniceaction.blogspot.com

Venice Coalition to Preserve Unique Community Character (VC-PUCC)
http://savevenice.me/about-us/

Venice Community Housing (VCH)
http://www.vchcorp.org

Enclosures

cc: the above organizations

August 22, 2016

VOTE NO on VENICE BUSINESS IMPROVEMENT DISTRICT!

Dear Councilmembers,

THE CITY OF LOS ANGELES **MUST NOT** SIGN A CONTRACT WITH **KNOWN OPERATORS OF ILLEGAL BUSINESSES IN VENICE.**

Long-term residents have been illegally & systematically removed from multi-unit apartment buildings on Ocean Front Walk and elsewhere in Venice.

On June 20, 2016, Los Angeles City Attorney Mike Feuer charged Carl Lambert and Andy Layman, 2 prominent local business owners, with operating illegal hotels in RSO apartment buildings on OFW.

Lambert & Layman are both former Presidents of the Venice Chamber of Commerce. They are 2 of the 9 signatures on the proposal/ ballot solicitation for the Venice Business Improvement District.

Carl Lambert has been the primary promoter of the Venice Business Improvement District starting in 2013 as a member of the Ocean Front Committee of the Venice Neighborhood Council when this proposal was referred to as the Ocean Front Walk Business Improvement District.

Lambert is a lawyer, broker and tax expert. He has converted 5 RSO apartment buildings in Venice into hotels.

As immediate past president of the COC he set the tone for business practices in Venice. The cumulative effect of his apparent willingness to ignore or manipulate laws while COC president is a pervasive pattern of prominent business owners & developers also ignoring or manipulating the law. This activity has been brought to the attention of various city departments including Planning & Building & Safety.

Carl Lambert has worked closely with City Councilman Mike Bonin on issues in Venice including the BID, Venice Forward, & LAPD Surveillance.

DO NOT SUPPORT CRIMINAL OPERATORS IN VENICE:

- **Illegal change-of-use of Rent Stabilized apartments to illegal hotels.**
- **Illegal change-of-use of residential apartments to illegal commercial office & event use.**
- **Intimidation of senior residents, illegal evictions, buyouts under pressure.**

- **Questionable reporting on Mello Act compliance by property owners. The Mello Act is a California state law that protects residential housing and affordable units in the coastal zone.**

- **Questionable Venice Sign Off (VSOs) & Coastal Exemption Permit (CEXs) protocols. Abuse of the terms "renovation" & "extension" for virtual demolitions and McMansion replacements. NO due process for community. Loss of revenue for the City of Los Angeles.**

- **Abuse of Permit Fee assessments based on applicant estimates of total project costs causing a loss revenue for the City of Los Angeles.**

If you illegally remove long-term residents you are removing neighbors, friends, families, local children, community, and the very essence of a "neighborhood."

You are also removing voters.

If you illegally remove long-term residents & replace them with illegal businesses, those businesses & Chamber of Commerce members vote in the Neighborhood Council elections instead of long-term residents. They promote their agenda.

SPECULATORS WIN AGAIN.

State law allows business owners to form Business Improvement Districts. That is not the issue.

The CITY OF LOS ANGELES MUST VOTE NO to the **VENICE BID.**

THE LAW MUST MATTER.

ONE SET OF LAWS FOR ALL CONSTITUENTS.

THE CITY OF LOS ANGELES MUST NOT SIGN A CONTRACT WITH **KNOWN OPERATORS OF ILLEGAL BUSINESSES IN VENICE.**

The Venice Property Owner's Association is a private entity that will control the Venice BID. Steve Neumann is the only named person in the Venice Property Owner's Association registration. There is no information on the other executive officers of this entity in spite of numerous requests for information to the Office of the City Clerk.

23.04% of the property in the proposed Venice BID is city-owned. The assessment cost is $450,000+ per year of taxpayer money.

The City of LA, while committing more than $450,000 per year, would have zero input in the BIDs operation. Neither will residents.

There has been NO public input.

With city-owned property making up 23.04% of the assessment area, the Venice BID would be a privatization of public areas and city budget for the benefit of private businesses and property owners, some of whom operate illegally, with no public or city input. That is criminal.

Long-term residents have an invested stake in their community and illegally removing them removes the stabilizing presence of family, friends and neighbors. Years of "illegal-change-of- use" complaints to the Department of Building & Safety were closed with no violation but tenants are gone.

These homes must to be returned to their legal use.

Venice is a unique 3-square-mile coastal community. It has the oldest "intentional" black community on the west coast of America.

Venice is currently under a gang injunction.

Venice has more illegal RSO apartment building conversions to illegal hotels and more Airbnb rental listings than any other area of Los Angeles.

These 2 realities cannot logically co-exist.

If Venice is under a legitimate gang injunction why is the City of Los Angeles allowing tourists from all over the world to be put at risk?

Airbnb is putting travelers at risk by refusing to register hosts and thereby allowing rentals on their platform in an area under a gang injunction.

Or is the Venice gang injunction a tool of gentrification?

The city must decide. Allowing these two realities to co-exist is a betrayal of everyone.

A very small group of wealthy property owners combined with the City at 23.04% could pass this vote.

This would be detrimental to the community of Venice as well as small business owners and visitors. Property-owner assessment fees will be passed on to tenant business owners. This will increase the cost of everything from local food prices to goods and services as smaller vendors are potentially forced out. This will have a cumulative negative effect on quality of life for residents and on visitor access.

The entire process of the BID has been secretive. In spite of multiple requests to CD 11 for a community meeting there was only one public presentation by Debbie Dyner Harris

at a Venice Neighborhood Council meeting on April 19, 2016. It was a 5 min overview of the concept and the geographic area of the proposed BID with no Q&A.

City assessor's records show that many properties have been bought in the BID area in the last 6-12mths. This appears to be an unfair advantage in business for those on the inside track, equivalent to insider trading.

A lot of focus in discussions of BIDs is on security. In Venice, the City of Los Angeles has failed to enforce many of its own laws. Property owners have made a lot of money using illegal tactics to remove tenants and benefit themselves at a huge cost to the community.

Who are the criminals?

Do not compound injustice.

VOTE NO on the VENICE BUSINESS IMPROVEMENT DISTRICT!
Illegal business owners must not be rewarded by our city with our $!

Sincerely,

Margaret Molloy
Laddie Williams

June 20, 2016.
CITY ATTORNEY MIKE FEUER FILES ACTIONS AGAINST PROPERTIES ALLEGEDLY OPERATING UNLAWFULLY AS HOTELS OR SHORT TERM RENTALS
http://www.lacityattorney.org/#!City-Attorney-Mike-Feuer-Files-Actions-Against-Properties- Allegedly-Operating-Unlawfully-as-Hotels-or-ShortTerm-Rentals-Complaints-Allege- RentStabilized-Properties-Illegally-Converted/c1143/576840d70cf240932ed10ce4

June 22, 2016.
2 days after the City Attorney's announcement, Carl Lambert & Andy Layman continued with a pre-arranged but unpermitted Venice Chamber of Commerce mixer on the rooftop of Layman's illegal hotel.

Venice Neighborhood Council board members attended.

Their event was fully documented by fellow Chamber members Venice Paparazzi.

Venice Paparazzi was on the scene at Venice Chamber of Commerce's Rooftop Mixer at Venice Beach Suites and Hotel
http://www.venicepaparazzi.com/events/venicebeachsuitesandhotelrooftop/

July 27th, 2016.
LAPD Pacific Division Captain Nicole Alberca performed the swearing-in ceremony of the new Venice Chamber of Commerce board.

2 group emails to senior LAPD, CD 11 and the City Attorney's Office requesting that Captain Alberca withdraw from the ceremony because of the message this sends to residents of Venice & beyond were ignored.

Captain Alberca handed the baton from Carl Lambert to George Francisco. Francisco is the current COC President and Venice Neighborhood Council vice-president. He works closely with Lambert & Layman in the COC.

March 28, 2015.
Carl Lambert email exchange after meeting with Mike Bonin.

From: Carl Lambert [mailto:carl@lambertinc.com]
- **Sent**: Saturday, March 28, 2015 07:21 PM
- **To**: Ellia Thompson; 'bunge, Jose' <bungejose@yahoo.com>; tnitti@prodigy.net <tnitti@prodigy.net>; Ann Everest <ann@generalrealestate.net>; 'georgeb@anotek.com' <georgeb@anotek.com>
- **Subject: Zoning change**

All, I spent an hour this morning with **Bonin**. He brought up the subject by saying "I heard you had a good meeting with Tricia and Chris".

He said that it made since to make the change. I reinforced that we could then join the BID which is his pet project for the Boardwalk.

Elia, What are the next steps to get it moving.

Best, Carl

Carl J. Lambert
- President
- Lambert Investments, Inc.
- 5 Westminster Avenue, Suite 101
- Venice, California 90291
- (310) 453-9656
- Fax (310) 829-6288
- Cell (310) 663-6030
- Carl@Lambertinc.com
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Subject: Re: Zoning change

Carl,

That is fantastic. Thanks for being our bird dog!

Dana and I are both on vacation this week, but I will reach out to Chris and Tricia early next week. (City is closed on Monday for Cesar Chavez)

We need to work out the logistics with the Council office and have them force Housing to back off. If for any reason, Housing won't listen, the City Attorney will.

Thanks again Carl. I'll let you all know when I hear back from the Council office.

March 28, 2015.
Carl Lambert discusses a Venice BID at a meeting of the Ocean Front Committee, Venice Neighborhood Council.

https://www.youtube.com/watch?v=QstErnU0dQ4
CARL LAMBERT PROPOSES A B.I.D. FOR VENICE BOARDWALK 4-1-13

- **Lambert: 3.45**
- Cleaning up the end to the pier there. I mean we need some money there. And at first they wouldn't do that at Pico because nobody cared about Ocean Park. Well a couple of hotels came in and all of a sudden they cared about Ocean Park. And that got cleaned up because the smell used to be there all the time.

- **Q: 4.15**
- What is the best way to get a line item?
- **Lambert: 4.20**
- We need to co-ordinate our troops. We get a lot of different organizations all talking about the boardwalk. get Bonin & Bill.....
- **Lambert: 6.09**
- Recognize that Bonin & Bill will be right behind us, no problem there...but we need to work with them to start turning the other heads...
- **Lambert: 6.43**
- ...that could be bought off, passed by VNC....

July 19, 2006.
Carl Lambert email discussing a workaround to keep payment for a tenant buyout as non taxable. Lambert is described by Fraser as a tax expert.

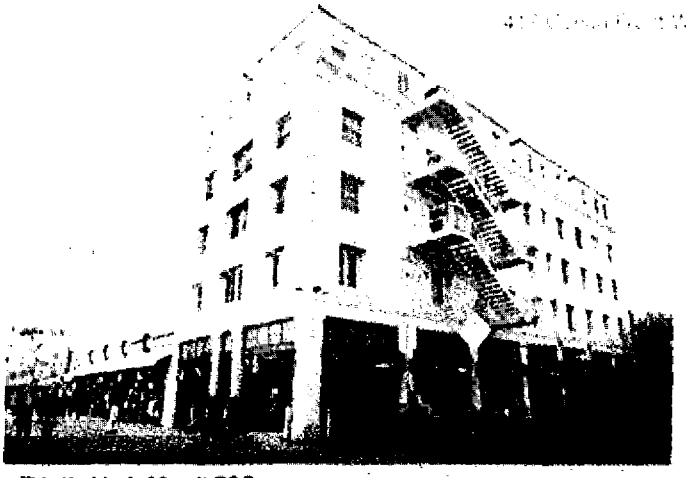
"This will be in settlement of a claim and non taxable. They can disclose it to (employer). I will give them a letter from a tax attorney so it will be disclosed and non taxable. Thanks Carl."

From: "louise fraser" <louise@louisefraser.com>
To: [redacted]
Subject: Fw: [redacted]
Date: Wed, 19 Jul 2006 13:59:46 -0700
>Hi [redacted]
>
>Here is Carl's response. Maybe you could show it to your accountant. Carl is
>a lawyer and a qualified tax accountant, so he knows his stuff!
>
>Let me know what you think
>
>Thanks
>
>Louise
>

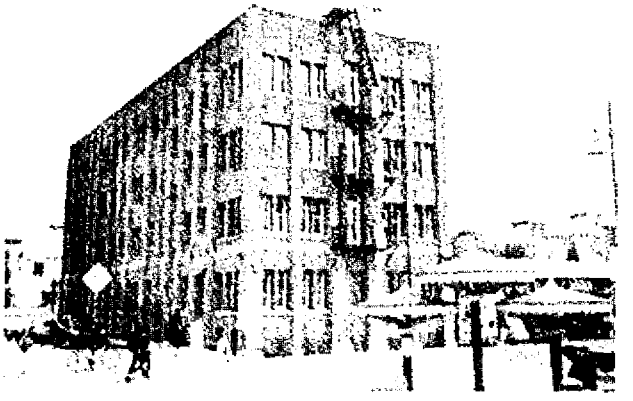
>----- Original Message -----
>From: "Carl Lambert" <CarlLambert@mycingular.blackberry.net>
>To: "Louise Frasier" <louise@louisefraser.com>
>Sent: Wednesday, July 19, 2006 12:07 PM
>Subject: Re: [redacted]
>
>
> > This will be in settlement of a claim and non taxable, They can disclose
>it to boing. I will give them a letter from a tax attorney so it will be
>disclosed and non taxable. Thanks Carl.
> > Sent via BlackBerry from Cingular Wireless
> >

> > -----Original Message-----
> > From: "louise fraser" <louise@louisefraser.com>
> > Date: Wed, 19 Jul 2006 11:53:42
> > To:<carl@lambertinc.com>
> > Subject: Fw: 52 Paloma #1
> >
> > Hey Carl
> >
> > The good news is that the tenants in number 1 have had their application
>for their new house approved and are looking to move by 8/1. The bad news is
>a conversation I had with [redacted] today that she has expressed in the e-mail
>below. I assured her that she would not be 1099ed the day we met at Randy's,
>but today she came up with this.
> >
> > What do you think?
> >
> > Louise
> >

Mr. Lambert has converted 5 RSO apartment buildings in Venice into illegal hotels



THe Waldorf- 32 unit RSO apartments



25 unit RSO apartments-

52 Paloma- 8 units RSO apartment-

August 18, 2016.

Carl Lambert continues to use an illegal parking lot at 811- 815 Ocean Front Walk for his hotel guests.

Visitors say that Venice Breeze Suites provides free parking at this location if you stay for several days.

Carl Lambert

Carl Lambert, of Lambert Investments, holds a law degree from Southwestern University, a Bachelor of Science degree in Business Administration from Pepperdine University and a Masters of Science Degree in Taxation from Northrop University. With over 26 years experience in real estate development and property management, his education and professional experience provide clients with a complete understanding of real estate transactions from practical, business, legal, and tax perspectives.

In 1979, Mr. Lambert formed Lambert Investments, Inc. as a real estate brokerage, syndication and property management firm. His rare vision for community growth and redevelopment has defined the company's approach to commercial and residential projects. Mr. Lambert's strong belief in collaboration has been widely recognized by community leaders and local agencies, most recently earning him a Gold Nugget Award for the first live/work artists' lofts in Santa Monica.As former and current President of Action Apartment Owners Association serving his third term and as a Director of both the local and statewide Apartment Owners Associations; Mr. Lambert's knowledge and accomplishments benefit clients and their properties throughout the Westside, providing creative solutions to the challenges of rent control and land use issues. His work with both local and state government regulators has been instrumental in the adoption of vacancy decontrol legislation. He currently writes a column for the Westside Apartment Monthly magazine.In addition to his Westside business ventures, Mr. Lambert is also involved with several projects on Catalina Island. In the late 1990s, he purchased a boarding house and transformed it into a multi-million-dollar repositioning venture; The Avalon Hotel, the island's premier boutique accommodation. Mr. Lambert's experience renovating this project allowed him to face the challenges of island-based construction as well as develop relationships with Avalon's community leaders. As a member of the Catalina Island Medical Center Foundation, president of the Tuna Club Foundation and a director of the Catalina Island Visitors Bureau and Chamber of Commerce, he is uniquely positioned to forge alliances and associations in the Avalon community.

Mr. Lambert also serves as a member of the Pepperdine University Advisory Board and is a founding member of the Pepperdine University Graziadio School of Business and Management Board of Visitors.

Mr. Lambert's, experience, foresight and specialized qualifications continues to make a meaningful difference for buyers, sellers and investors.

Dear Venice Neighborhood Council,

417 Ocean Front Walk- 32 unit RSO apartments

IS ADVERTISED AS A HOTEL ON MANY WEBSITES INCLUDING VENICE SUITES.....

Venice Suites ★★

Venice (Beach Cities) **Map**

4.0 out of 5 (144 reviews)

1.10 mi from Venice Ocean Front Walk

1-866-313-6242

Booked in the last 6 hours

We are sold out

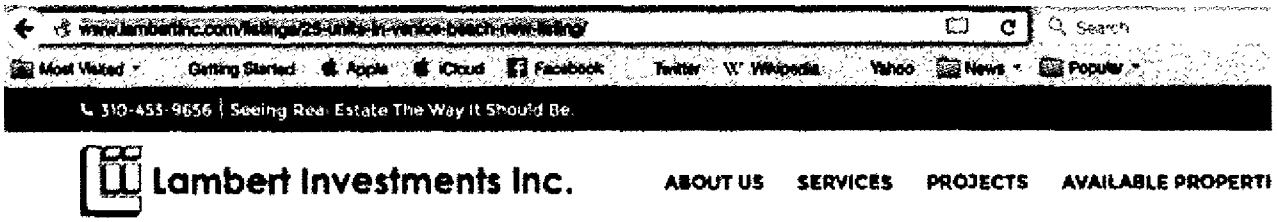
10/10/2015 - 10/13/2015

Re: **417 Ocean Front Walk**

Carl Lambert is a lawyer, broker and developer.

He is also a serial operator of unpermitted businesses. He has a pattern of buying buildings, emptying them of tenants, turning them into de facto hotels, advertising them for years as hotels, and then applying for an after-the-fact change-of-use permit to turn a Rent Stabilized apartment building into a legitimate hotel.

He sold 2 such apartment buildings in 2015, 52 Paloma Avenue and 29 Navy Street, after operating them for years in this way. 29 Navy was advertised for sale on his website as "currently operating 24 units as monthly/weekly rentals." (photo: http://www.lambertinc.com/ Oct 1, 2015)



25 UNITS IN VENICE BEACH – UNDER CONTRACT

Address: 29 Navy Street
Purchase Price: 9,995,000
Total Expenses: $210,752
Scheduled Monthly Income: $50,650
Scheduled Annual Income: $607,800

Zoning: LARD
Lot Size: 5,837
Building Square Feet: 13,849
Year Built: 1924
Parking: NONE

Prime Venice Beach LOCATION, LOCATION! World Famous Venice Beach Boardwalk! Totally rehabbed in 1993, copper plumbing, new electrical, tile counter tops & much more. Rooftop deck with ocean views & six units have ocean views. Ocean view units will bring higher rents. Currently operating 24 units as monthly/weekly rentals most can be vacant at close of escrow. View more photos at www.veniceadmiralsuites.com.

***Unit 22 is the only long term unfurnished lease tenant. Other rents are projected, higher rents for ocean views.**

Each of Mr. Lambert's 5 buildings have had change-of-use complaints filed with Los Angeles Housing + Community Investment Department's Code Enforcement Division. Tenants do not appear to have left happily. Complaints were filed on 417 Ocean Front Walk. Many complaints were filed on Mr. Lambert's four other properties. The tenants are gone.

How do these complaints go unanswered?

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address:	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District:	**Council District 11**	Case Number:	**247830**
Census Tract:	**273402**	Case Type:	**Complaints**
Rent Registration:	**0322172**	Inspector:	
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**32**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		

Nature of Complaint: Change of use/occupancy without Building permit and Certificate of Occupancy

Date ▲	Status
5/7/2009 11:31:00 AM	Complaint Closed
5/7/2009 12:00:00 AM	Complaint Received

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address:	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District:	**Council District 11**	Case Number:	**94697**
Census Tract:	**273402**	Case Type:	**Complaints**
Rent Registration:	**0322172**	Inspector:	**Thomas Reichmann**
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**32**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		

Nature of Complaint: Following properties are being demolished without permits. Tenants being asked to leave. They are being turned into Hotels. 417 S. Ocean Front Walk 29 Navy Street - Building a garden apartmnent on top done without permits. 15 Horizon Avenue -Being turned into Hotels tentants asked to leave.

Date ▲	Status
5/18/2009 12:12:00 PM	Complaint Closed
8/25/2006 6:23:00 PM	No Violations
8/24/2006 6:03:00 PM	Site Visit/Initial Inspection
8/9/2006 12:00:00 AM	Complaint Received

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	4286029004	Official Address:	417 S OCEAN FRONT WALK, VENICE 90291
Council District:	Council District 11	Case Number:	249259
Census Tract:	273402	Case Type	Complaints
Rent Registration:	0322172	Inspector:	Richard Briseno
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	32	Total Exemption Units:	0
Regional Office:	West Regional Office		
Regional Office Contact:	(310)-996-1723		

Nature of Complaint: Change of use/occupancy without Building permit and Certificate of Occupancy

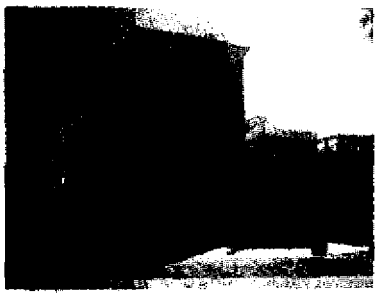
Date ▲	Status
8/9/2011 1:27:00 PM	Complaint Closed
5/29/2009 11:20:00 AM	Photos
5/29/2009 11:05:00 AM	Site Visit/Initial Inspection
5/29/2009 11:05:00 AM	All Violations Resolved Date
5/15/2009 12:00:00 AM	Complaint Received

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	4286029004	Official Address:	417 S OCEAN FRONT WALK, VENICE 90291
Council District:	Council District 11	Case Number:	249259
Census Tract:	273402	Case Type	Complaints
Rent Registration:	0322172	Inspector:	
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	32	Total Exemption Units:	0
Regional Office:	West Regional Office		
Regional Office Contact:	(310)-996-1723		

Nature of Complaint: Change of use/occupancy without Building permit and Certificate of Occupancy

Date ▲	Status
5/28/2009 9:38:00 AM	Complaint Closed
5/15/2009 12:00:00 AM	Complaint Received



PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	4286029004	Official Address:	417 S OCEAN FRONT WALK, VENICE 90291
Council District:	Council District 11	Case Number:	290163
Census Tract:	273402	Case Type	Systematic Code Enforcement Program
Rent Registration:	0322172	Inspector:	Zuberi Smith
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	32	Total Exemption Units:	0
Regional Office:	West Regional Office		
Regional Office Contact:	(310)-996-1723		

Date ▲	Status
6/21/2010 11:23:00 AM	All Violations Resolved Date
6/21/2010 11:15:00 AM	Site Visit/Compliance Inspection
6/18/2010 12:00:00 AM	Compliance Date
5/12/2010 1:01:00 PM	Order Issued to Property Owner
5/12/2010 9:05:00 AM	Site Visit/Initial Inspection

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	4286029004	**Official Address:**	417 S OCEAN FRONT WALK, VENICE 90291
Council District:	Council District 11	**Case Number:**	502089
Census Tract:	273402	**Case Type:**	Complaints
Rent Registration:	0322172	**Inspector:**	David Brandon
Historical Preservation Overlay Zone:		**Case Manager:**	
Total Units:	32	**Total Exemption Units:**	0
Regional Office:	West Regional Office		
Regional Office Contact:	(310)-996-1723		

Nature of Complaint: Change of use/occupancy without Building permit and **Certificate of Occupancy**

Date ▲	Status
3/10/2015 9:30:00 AM	Site Visit/Compliance Inspection
3/4/2015 12:00:00 AM	Compliance Date
1/26/2015 10:42:00 AM	Order Issued to Property Owner
1/13/2015 10:42:00 AM	Site Visit/Initial Inspection
1/6/2015 10:37:00 AM	Complaint Received

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District	**Council District 11**	Case Number	**264836**
Census Tract:	**273402**	Case Type	**Complaints**
Rent Registration:	**0322172**	Inspector	**Richard Brinson**
Historical Preservation Overlay Zone:		Case Manager	
Total Units:	**32**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact	**(310)-996-1723**		

Nature of Complaint: Unapproved, defective or inoperative receptacles at kitchen/bathroom/exterior, Windows, doors, cabinets, and frames not **operable, defective, missing, and/or unsanitary.** Plaster/drywall wall/ceiling covering **defective, deteriorated, or paint is peeling**

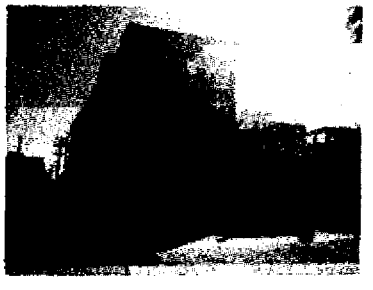
Date ▲	Status
10/20/2009 12:45:00 PM	Site Visit/Compliance Inspection
10/20/2009 12:25:00 PM	Complaint Closed
10/20/2009 12:18:00 PM	All Violations Reserved Date
10/16/2009 12:00:00 AM	Compliance Date
9/9/2009 2:26:00 PM	Order Issued to Property Owner
9/9/2009 9:44:00 AM	Site Visit/Initial Inspection
8/22/2009 12:00:00 AM	Complaint Received

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address:	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District:	**Council District 11**	Case Number:	**502089**
Census Tract:	**273402**	Case Type	**Property Management Training Program**
Rent Registration:	**0322172**	Inspector	**David Brandon**
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**32**	Total Exemption Units	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		

Nature of Complaint: Change of use/occupancy without Building permit and **Certificate of Occupancy**

Date ▲	Status
3/10/2015 9:30:00 AM	Site Visit/Compliance Inspection
3/4/2015 12:00:00 AM	Compliance Date
1/26/2015 10:42:00 AM	Order Issued to Property Owner
1/13/2015 10:42:00 AM	Site Visit/Initial Inspection
1/6/2015 10:37:00 AM	Complaint Received

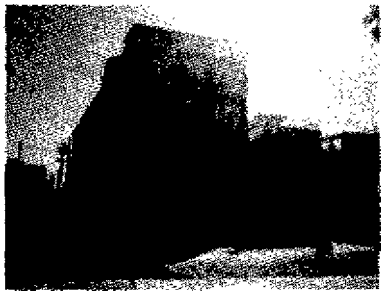


PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address:	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District:	**Council District 11**	Case Number:	**94697**
Census Tract:	**273402**	Case Type:	**Complaints**
Rent Registration:	**0322172**	Inspector:	**Thomas Reichmann**
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**32**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		

Nature of Complaint: Following properties are being demolished without permits. Tenants being asked to leave. They are being turned into Hotels. 417 S. Ocean Front Walk 29 Navy Street - Building a garden apartmnent on top done without permits. 15 Horizon Avenue -Being turned into Hotels tenants asked to leave.

Date ▲	Status
5/18/2009 12:12:00 PM	Complaint Closed
8/25/2006 6:23:00 PM	No Violations
8/24/2006 6:03:00 PM	Site Visit/Initial Inspection
8/9/2006 12:00:00 AM	Complaint Received



PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286029004**	Official Address:	**417 S OCEAN FRONT WALK, VENICE 90291**
Council District:	**Council District 11**	Case Number:	**555363**
Census Tract:	**273402**	Case Type:	**Complaints**
Rent Registration:	**0322172**	Inspector:	
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**32**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		

Nature of Complaint: Change of use/occupancy without Building permit and Certificate of Occupancy, Unapproved Unit(s)

Date ▲	Status
12/14/2015 3:17:00 PM	Complaint Closed
12/14/2015 11:31:00 AM	Complaint Received

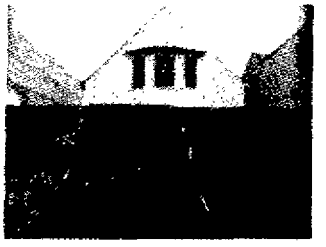
2 complaints were filed in 2013 for unpermitted construction at 811 Ocean Front Walk. This is Mr. Lambert's Venice Breeze Suites parking. A garage was demolished, 2 trees removed, concrete poured, and a chain link fence, security lighting and an electric gate were installed. According to Los Angeles Building & Safety Department website no permits were issued on this property since 2004.

811 S OCEAN FRONT WALK

Date Received:	4/19/2013
Description:	CONSTRUCTION IN PROGRESS WITHOUT PERMITS OR INSPECTIONS
Inspector:	ROBERT GARTH
Phone:	(310)417-8640
Status:	REFERRED TO HOUSING DEPARTMENT

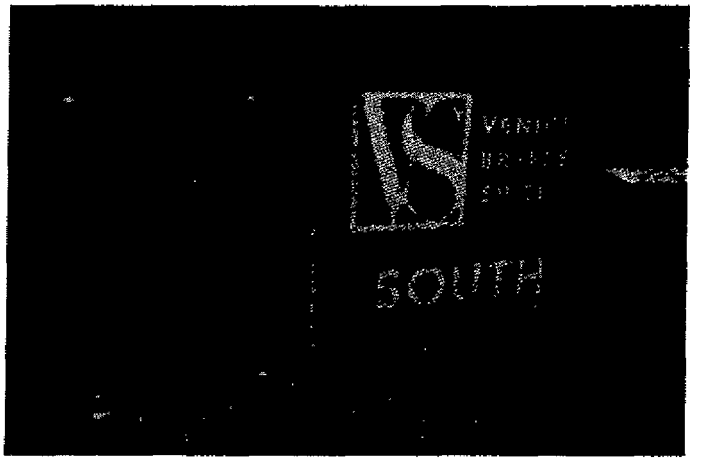
PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	**4286427007**	Office Address:	**511 S OCEAN FRONT WALK, Los Angeles 90291**
Council District:	**Council District 11**	Case Number:	**434796**
Census Tract:	**271402**	Case Type:	**Complaints**
Rent Registration:		Inspector:	**Aydin Akbarat**
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	**2**	Total Exemption Units:	**0**
Regional Office:	**West Regional Office**		
Regional Office Contact:	**(310)-996-1723**		



Nature of Complaint: Construction in progress without permits. Sales of merchandise on residential zone property. Miscellaneous articles stored on premises

Date ▲	Status
8/13/2013 11:04:00 AM	Complaint Closed
8/13/2013 11:01:00 AM	All Violations Resolved Date
8/8/2013 1:15:00 PM	Site Visit/Complaints Inspection
8/21/2013 12:00:00 AM	Compliance Date
5/15/2013 7:47:00 AM	Order Issued to Property Owner
5/9/2013 1:55:00 PM	Photos
5/9/2013 11:46:00 AM	Site Visit/Initial Inspection
5/3/2013 4:22:00 PM	Complaint Received



In November 2015 Mr. Lambert applied to the California Coastal Commission for an after-the-fact change-of-use permit to convert 2 Breeze, a 32-unit Rent Stabilized apartment that he has owned since 2007 into a legitimate hotel. He said that the building was already operating as an unpermitted hotel when he bought it in 2008. He presented Los Angeles City's SurveyLA report that it was previously a hotel.

November 2, 2015

TO: Coastal Commissioners and Interested Parties

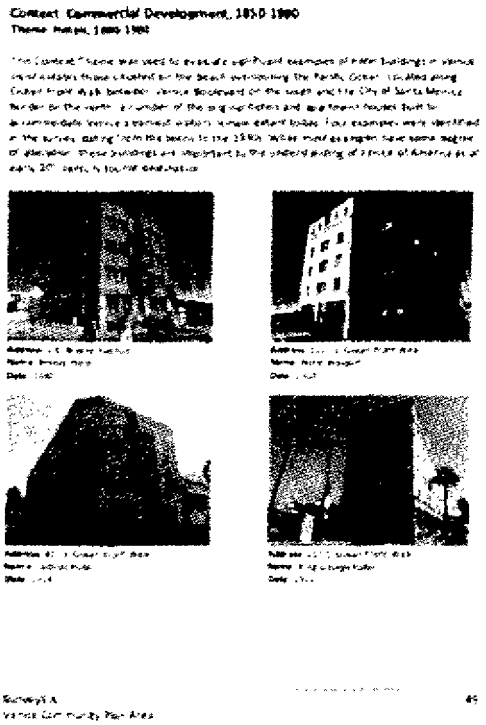
FROM: South Coast District Staff SUBJECT: ADDENDUM TO ITEM W17a, COASTAL DEVELOPMENT PERMIT APPLICATION NO. 5-14-1932 FOR THE COMMISSION MEETING OF WEDNESDAY, NOVEMBER 4, 2015.

Project History

- **1930**: Building constructed as "Breeze Hotel" and used as apartments.
  - Building footprint extends to property lines w/no on-site parking; City determined project has grandfathered parking rights
- **Late 1900s-Early 2000s**: Property had both hotel and apartment use. (See sign from prior owner.)
- **2007:** Applicant purchased subject property and began renovation for interior remodel with Coastal exemption and building permit from City.
- **2012:** City notified applicant that a change of use permit was required for transient occupancy use.
- **2012**: Applicant submitted application to City for change of use to 30-room hotel.

8

Excerpt from City's historical property survey describes subject site as hotel →



10

LADBS records show that the original construction permit for 2 Breeze was for an apartment building and all subsequent Certificates of Occupancy were also apartment.

Bldg. Form 1

1

DEPARTMENT OF BUILDING AND SAFETY

Application for the Erection of Buildings

VENICE ANNEX CLASS [redacted]—[redacted]—"C"

To the Board of Building and Safety Commissioners of the City of Los Angeles:

[illegible]

TAKE TO ROOM No. 6 REAR OF NORTH ANNEX 1st FLOOR CITY CLERK PLEASE VERIFY

Lot No. 1 Block 2

(Description of Property) Cummings Beach Tract

Venice

O.K. City Clerk

TAKE TO FIRST FLOOR 242 SO. BROADWAY ENGINEER PLEASE VERIFY

District No. .... M. B. Page .... F. B. Page ....

No. 2 Breeze Ave. (S. Side) Street

(Location of Job) Bet. Ocean Front and Speedway

(USE INK OR INDELIBLE PENCIL)

O.K. City Engineer

1. Purpose of Building Apartment House No. of Rooms 60 No. of Families 30
2. Owner's name [illegible] Phone
3. Owner's address [illegible] Black Bldg. [illegible] 3126
4. Architect's name [illegible] Phone [illegible]
5. Contractor's name [illegible] Lic. No. 6762 Phone [illegible]
6. Contractor's address [illegible] 18000
7. TOTAL VALUATION OF BUILDING (Including Plumbing, Gas Fitting, Sewers, Cesspools, Elevators, Painting, Finishing, all Labor, etc.) $ 75000.00
8. Any other building or permit for a building on lot at present? No How used?
9. Size of proposed building 36 x 107 Size of lot [illegible] x 110' feet
10. Number of stories in height 4 Height to highest point 48'0"
11. Material of foundation Concrete Character of soil Sand
12. Material of exterior walls Brick
13. Material of interior construction Frame
14. Material of floors Wood
15. Material of roof Composition

Lot Zone is Property in ?

I have carefully examined and read the above application and know the same is true and correct, and hereby certify and agree, if a permit is issued, that all of the provisions of the Building Ordinances will be complied with, whether herein specified or not; also certify that the plans and specifications herewith filed conform to all of the provisions of the Building Ordinances and State Laws.

OVER 2/1/29 11 30 (Sign here) [illegible signature]

(Owner or Authorized Agent)

FOR DEPARTMENT USE ONLY

PERMIT NO.		Application checked and found	Stamp here when permit is issued
19463	[illegible]	[illegible]	ISSUED JUL 30 19[illegible]

VENICE ANNEX

#455 [illegible]

FOR DEPARTMENT USE ONLY

APPLICATION	O. K.
CONSTRUCTION	O. K.
ZONING	O. K.
SET-BACK LINE	O. K.
ORD. 33761 (N. S.)	O. K.
FIRE DISTRICT	O. K.

REMARKS

Address of Building 2 Breeze Avenue

Permit No. and Year V 1065 of 1919

Certificate Issued October 16, 1919

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the building at above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses; Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Act,—for following occupancies:

2 Story, Type III-A, 35' x 100' 30 Unit Apartment House altered to 31 Unit Apartment House, H-2 Occupancy.

Owner R. Abramson

Owner's Address 2 Breeze Avenue Venice, California

Form B-95a—20M—3-42 G. E. MORRIS, Superintendent of Building By A. Miller

---

Address of Building 1001 Ocean Front Walk 2 Breeze Avenue

Permit No. and Year W55452/1965

Certificate Issued August 20, 1965

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

REHABILITATION CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy Must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the deficiencies in this building have been corrected and the building complies with the applicable requirements of Division 49, Article 1, Chapter 9 of the Municipal Code for the following occupancies:

Four-story, type III A, 36'X108' Thirty-one unit apartment house

H-2 Occupancy

EXCEPT FOR DEVIATIONS APPROVED BY BOARD OF BLDG. & SAFETY COMMISSIONERS X21401

THIS IS A REINSPECTED BUILDING

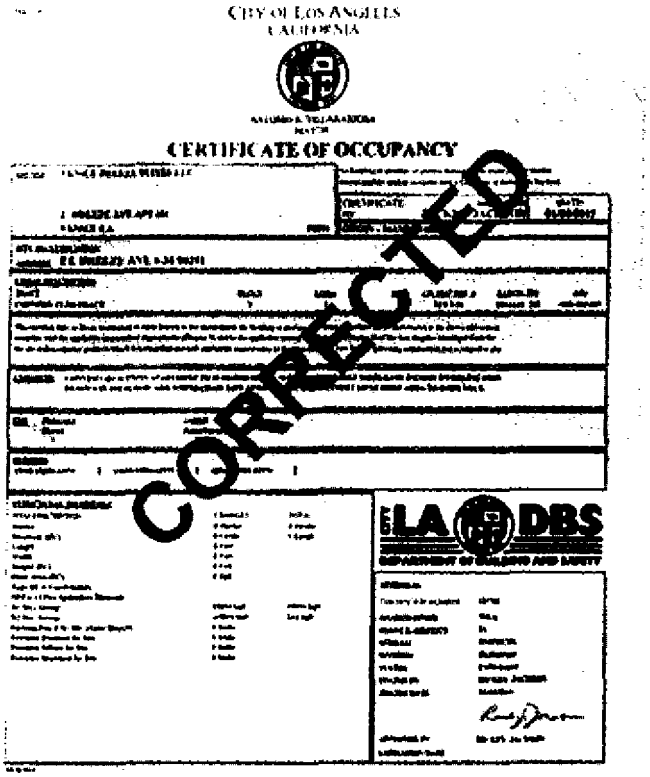
Owner Mr. Ruwin Farber

Owner's Address 929 Hauser Boulevard Los Angeles, California

Form B156—20M—12-52 [redacted] Superintendent of Building By C.M. WILSON km

The comment section of the 2015 LADBS application for a change-of-use illustrates the reality.

COMMENT	CONVERT (6) 1) UNITS APARTMENT TO 26 ROOMS W[illegible] MODERATE INCOME DWELLING UNIT. RENOVATE 1ST FLOOR, ADD WHEELCHAIR LIFT AT [illegible] CONVERT 645 SF ROOF AREA TO ROOF DECK	
USE	PRIMARY Hotel	OTHER Apartment



CITY OF LOS ANGELES
CALIFORNIA

CERTIFICATE OF OCCUPANCY

CORRECTED

LA DBS
DEPARTMENT OF BUILDING AND SAFETY

It is apparent that other elements were also in play at 2 Breeze.

APPROVED
FEB 18 2015
BOARD OF RECREATION
& PARK COMMISSIONERS

REPORT OF GENERAL MANAGER NO. 15-036

DATE February 18, 2015 C.D. 11

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: VENICE BEACH – PUBLIC SAFETY CAMERA (PRJ20875) PROJECT - ALLOCATION OF QUIMBY FEES AND EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

a prescribed predictable manner to ensure a high level of uptime and availability. The Venice Beach LAPD substation will have both viewing and proactive response capabilities. Video will be recorded at both the Venice Beach Police substation and the 2 Breeze Avenue LAPD location. The locations along Ocean Front Walk identified in the preliminary design provide situational awareness through fixed and pan-tilt-zoom cameras. An audio loudspeaker is included in many of the locations and audio intervention is possible from any monitoring station within this system. It is proposed that the 2 Breeze Avenue location will serve as the main wireless network infrastructure aggregation location for most of the Venice Beach surveillance equipment.

Upon approval of this Report, $298.288.00 in Quimby Fees can be transferred from the Quimby Fees Account No. 89460K-00 to the Venice Beach Account No. 89460K-VE and allocated to the Venice Beach – Public Safety Camera (PRJ20875) project. The total Quimby Fees allocation for the Venice Beach – Public Safety Camera Project (PRJ20875) project is $298.288.00. These Quimby Fees were collected within two (2) miles of Venice Beach, which is the standard distance for the allocation of the Quimby Fees for community recreational facilities.

installed the donated cameras in coordination with the Los Angeles Police Department (LAPD), the Office of CD-11, and the RAP Planning, Construction, and Maintenance Branch (PCM). The cameras were installed near and along Ocean Front Walk at the following locations:

Two (2) pole mounted intersection camera locations:

- Pacific and Brooks Ct.
- Pacific and Westminster Avenue

Building mounted equipment locations, most of which are privately owned:

- VBS near Westminster and Ocean Front Walk (3 cameras)
- 2 Breezeway Avenue Building (2 cameras)
- Venice Beach Police Sub Station (2 cameras)
- 1101 Ocean Front Walk Building
- VBN near Brooks Avenue and Ocean Front Walk (3 cameras)
- Good See Optical Lab Building
- 615 Speedway Building (2 cameras)
- 1211 Ocean Front Walk Building (2 cameras)
- Danny's Restaurant Building (2 cameras)

APPROVED
APR 0 1 2015
BOARD OF RECREATION AND PARK COMMISSIONERS

REPORT OF GENERAL MANAGER NO. 15-068

DATE: April 01, 2015 C.D. 11

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: VENICE BEACH – PUBLIC SAFETY CAMERA PROJECT (PRJ20875)- AUTHORIZE USE OF THE CITY OF CORONA'S SELECTION PROCESS FOR THE DESIGN, LABOR, MATERIAL AND SERVICES OF SECUIRTY A CAMERA SYSTEM WITH LEVERAGE INFORMATION SYSTEMS, INC.

R. Adams		*V. Israel	
R. Barajas		K. Regan	
H. Fujita		N. Williams	

M. Shull
General Manager

Approved as amended see attached Disapproved ______ Withdrawn ______

REPORT OF GENERAL MANAGER

PG. 3 NO. 15-068

LAPD, in coordination with RAP, has determined that public safety awareness requires a delicate balance of tactics, technology, and process that when done properly improve citizen quality of life and safety. It is the objective of the proposed projects design to provide a technological solution that is tailored to the community of Venice Beach to accomplish this objective.

LAPD and RAP agree that intervention is fundamental to prevent and suppress criminal and nuisance activity. From a technical perspective, intervention requires minimal system latency and acceptable levels of video quality, and the ability to interact with live audio. **It is the LAPD's experience with local communities, when intervention is properly implemented, that the community not only accepts this capability, but will wholeheartedly embrace it.**

The proposed Project will be highly scalable, beginning with wireless network connectivity designed in a peer-to-peer fashion. Video traffic will flow through this network in a prescribed predictable manner to ensure a high level of uptime and availability. The Venice Beach LAPD substation will have both viewing and proactive response capabilities. Video will be recorded at both the Venice Beach Police substation and the LAPD 2 Breezeway LAPD location.

The preliminary design will be presented in three sections:
- Interaction and Intervention locations;
- Monitoring and Response; and,
- Networking Infrastructure

ON 11/7/13, OFW, along with other committees in a special meeting, recommended against cameras. **From the 11/7/13 minutes**:

SECURITY CAMERAS AND PUBLIC ADDRESS SYSTEM

The Ocean Front Walk Committee, Public Safety Committee and Visitor Impact Committee recommend the VNC not support security cameras.

Sevan Motion, second Laura.

7 in favor
3 oppose
0 abstain

The Ocean Front Walk Committee, Public Safety Committee and Visitor Impact Committee recommend the VNC to support the use of public address system for use in emergency and

evacuation purposes only.
Sevan Motion, second Laura.

7 in favor
3 oppose
0 abstain

However, they did support increased lighting at the meeting. On Nov. 25 was another joint meeting, this time including the Board. However, only OFW appears to have voted:

6) SECURITY CAMERAS

The OFW Committee recommends that the City of LA does not install security cameras on OFW, because they are an invasion of privacy, they have historically been poorly maintained,and they would be technologically unfeasible.
Shelley Motion,Therese Second

4 in Favor
2 Oppose
0 Abstain

The Board declined to take a position in its 12/2/13 meeting:
:
F SECURITY CAMERAS

MOTION:

The Venice Neighborhood Council recommends that the City of LA should not install security cameras on OFW, because they are an invasion of privacy, as they have historically been poorly maintained, and they would be technologically unfeasible.

Public Comment: Ron Kramer, Gary Harris

ACTION: Motion failed TE/SA 0-9-7

NEW SECURITY CAMERAS MOTION

MOTION:

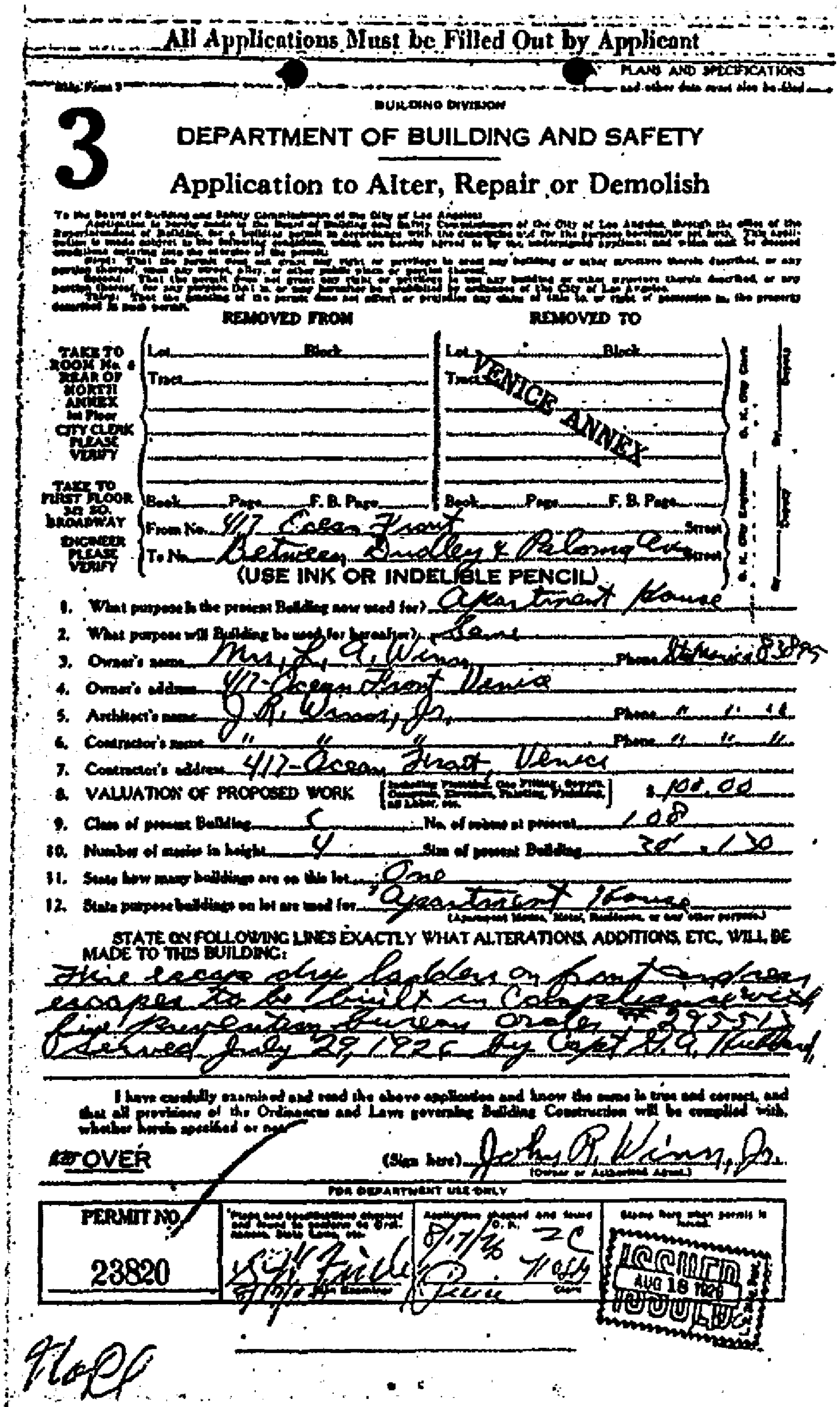
The Venice Neighborhood Council recommends that the City of LA should install security cameras on OFW, and ensure they are properly maintained.

ACTION: Motion failed SK/MK 4-5-7

Quimby funds were used to pay for 50% of the LAPD Public Safety Camera Project.

In regard to 417 Ocean Front Walk, the first document on file at LADBS is a building/ alteration permit issued in 1926 for an apartment building.

1926: Apartment



All Applications Must be Filled Out by Applicant

PLANS AND SPECIFICATIONS and other data must also be filed

BUILDING DIVISION

3

DEPARTMENT OF BUILDING AND SAFETY

Application to Alter, Repair or Demolish

[illegible]

REMOVED FROM	REMOVED TO
Lot ____ Block ____	Lot ____ Block ____
Tract ____	Tract VENICE ANNEX
Book ____ Page ____ F. B. Page ____	Book ____ Page ____ F. B. Page ____

TAKE TO ROOM No. 4 REAR OF NORTH ANNEX 1st Floor CITY CLERK PLEASE VERIFY

TAKE TO FIRST FLOOR 343 SO. BROADWAY ENGINEER PLEASE VERIFY

From No. 417 Ocean Front Street

To No. Between Dudley & Paloma Av. Street

(USE INK OR INDELIBLE PENCIL)

1. What purpose is the present Building now used for? Apartment House
2. What purpose will Building be used for hereafter? Same
3. Owner's name Mrs. L. A. Winn Phone [illegible] 83795
4. Owner's address 417 Ocean Front Venice
5. Architect's name J. R. Winn, Jr. Phone " " "
6. Contractor's name " " " Phone " " "
7. Contractor's address 417 Ocean Front Venice
8. VALUATION OF PROPOSED WORK [Including Plumbing, Gas Fitting, Sewers, Cesspools, Elevators, Painting, Finishing, all Labor, etc.] $ 100.00
9. Class of present Building C No. of rooms at present 108
10. Number of stories in height 4 Size of present Building 30' x 130'
11. State how many buildings are on this lot One
12. State purpose buildings on lot are used for Apartment House (Apartment House, Hotel, Residence, or any other purpose)

STATE ON FOLLOWING LINES EXACTLY WHAT ALTERATIONS, ADDITIONS, ETC., WILL BE MADE TO THIS BUILDING:

Fire escape, stop ladders on front and rear escapes to be built in compliance with fire prevention bureau order #29351 served July 29, 1926 by Capt. H. G. Hubbard

I have carefully examined and read the above application and know the same is true and correct, and that all provisions of the Ordinances and Laws governing Building Construction will be complied with, whether herein specified or not.

OVER

(Sign here) John R. Winn, Jr. (Owner or Authorized Agent)

FOR DEPARTMENT USE ONLY

PERMIT NO.	Plans and Specifications checked and found to conform to Ordinances, State Laws, etc.	Application checked and found O.K.	Stamp here when permit is issued.
23820	[illegible] 8/16/26 Plan Examiner	8/7/26 2C [illegible] Clerk	ISSUED AUG 18 1926

[illegible]

1953: Apartment

3

APPLICATION TO ALTER, REPAIR, or DEMOLISH AND FOR A Certificate of Occupancy

Form B-3
CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY
BUILDING DIVISION

Lot No. .....

Tract. .....

Location of Building 417 Ocean Front, Venice, California (House Number and Street)

Between what cross streets? .....

Approved by City Engineer

Deputy.

USE INK OR INDELIBLE PENCIL

1. Present use of building Apartment Bldg. (Store, Dwelling, Apartment House, Hotel or other purpose) Families Rooms
2. State how long building has been used for present occupancy
3. Use of building AFTER alteration or moving Same Families Rooms
4. Owner Mr. Booker (Print Name) Phone Ex-92305
5. Owner's Address 417 Ocean Front P. O. Venice State
6. Certificated Architect License No. Phone
7. Licensed Engineer State License No. Phone
8. Contractor Termite Insulating Co. State License No. 118624 Phone Ex-44140
9. Contractor's Address 1629 - 12th Street, Santa Monica
10. VALUATION OF PROPOSED WORK (Including all labor and materials and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon.) $450.00
11. State how many buildings NOW on lot and give use of each. One - Apartment Bldg. (Store, Dwelling, Apartment House, Hotel or other purpose)
12. Size of existing building x Number of stories high Height to highest point
13. Material Exterior Walls Brick (Wood, Steel or Masonry) Exterior framework (Wood or Steel)
14. Describe briefly all proposed construction and work:

Cut off partion walls in basement in areas indicated, raise foundations above top of concrete slab, replacing stucco where removed.

Cut off damage in posts in basement, at P, and install on concrete bases, extending above top of concrete floor.

Drill and chemically treat drywood termite infestations in ix window frames, and in tower of elevator shaft, opening inside plaster where necessary.

NEW CONSTRUCTION

15. Size of Addition x Size of Lot x Number of Stories when complete
16. Footing: Width Depth in Ground Width of Wall Size of Floor Joists x
17. Size of Studs x Material of Floor Size of Rafters x Type of Roofing

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

DISTRICT OFFICE **VENICE DISTRICT**

Sign here TERMITE INSULATING CO. (Owner or Authorized Agent)

By

FOR DEPARTMENT USE ONLY

PLAN CHECKING		OCCUPANCY SURVEY	
Valuation $		Area of Bldg. Sq. Ft.	Investigation Fee $
Fee $		Fee $	Cert. of Occupancy Fee $
			Bldg. Permit Fee $ 3.50
			Total $

TYPE V	Maximum No. Occupants 400 adj	Inside Lot No	Key Lot C E C A	Lot Size	Ft. rear alley / Ft. side alley
GROUP H-2	Plans and Specifications checked		Zone C-3	Fire District No. 2	District Map No. 7184
Fee Plans Rec'd	Correction Verified		Bldg. Line Ft.	Street Widening Ft.	Application checked and approved Clerk
Filed with	Plans, Specifications and Application rechecked and approved.		Continuous Inspection	SPRINKLER Specified—Required Valuation Included Type —No.	Inspector

DO NOT WRITE BELOW THIS LINE

TYPE OF RECEIPT	DATE ISSUED	TRACER NO. (M)	RECEIPT NO.	CODE	FEE PAID
Plan Checking					
Supplemental Plan Checking					✓
Building Permit	MAR 4 1953				

1954: Apartment

3

APPLICATION TO ALTER, REPAIR, OR DEMOLISH AND FOR A Certificate of Occupancy

Form B-3-6051-8-48
CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY
BUILDING DIVISION

Lot No. ____

Tract ____

Location of Building 417 - Ocean Front (House Number and Street) — Approved by City Engineer

Between what cross streets Paloma + Dudley — Deputy.

USE INK OR INDELIBLE PENCIL

1. Present use of building Apartment House (Store, Dwelling, Apartment House, Hotel or other purpose) Families 32 Rooms 112
2. State how long building has been used for present occupancy 35 years
3. Use of building AFTER alteration or moving Same Families 32 Rooms 112
4. Owner LOUIS BECKER (Print Name) Phone
5. Owner's Address 417 - Ocean Front Apt. #31
6. Certificated Architect ____ State License No. ____ Phone ____
7. Licensed Engineer ____ State License No. ____ Phone ____
8. Contractor Owner State License No. ____ Phone ____
9. Contractor's Address ____
10. VALUATION OF PROPOSED WORK (Including all labor and material and all permanent lighting, heating, ventilating, water supply, plumbing, fire sprinkler, electrical wiring and elevator equipment therein or thereon.) $125.00
11. State how many buildings NOW on lot and give use of each. Apartment House Only (Store, Dwelling, Apartment House, Hotel or other purpose)
12. Size of existing building 28 x 90 Number of stories high 4 Height to highest point 50 ft.
13. Material Exterior Walls Masonry (Wood, Stucco or Masonry) Exterior framework ____ Kind of Roof Brick + Stucco
14. Describe briefly all proposed construction and work: Put 3 new ceiling on 1 X 3 furring 16" O.C. 16" square celotex blocks.

NEW CONSTRUCTION

15. Size of Addition ____ x ____ Size of Lot ____ x ____ Number of Stories when complete ____
16. Footing: Width ____ Depth in Ground ____ Width of Wall ____ Size of Floor Joists ____ x ____
17. Size of Studs ____ x ____ Material of Floor ____ Size of Rafters ____ x ____ Type of Roofing ____

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

Sign here LOUIS BECKER (Owner or Authorized Agent)

By [signature]

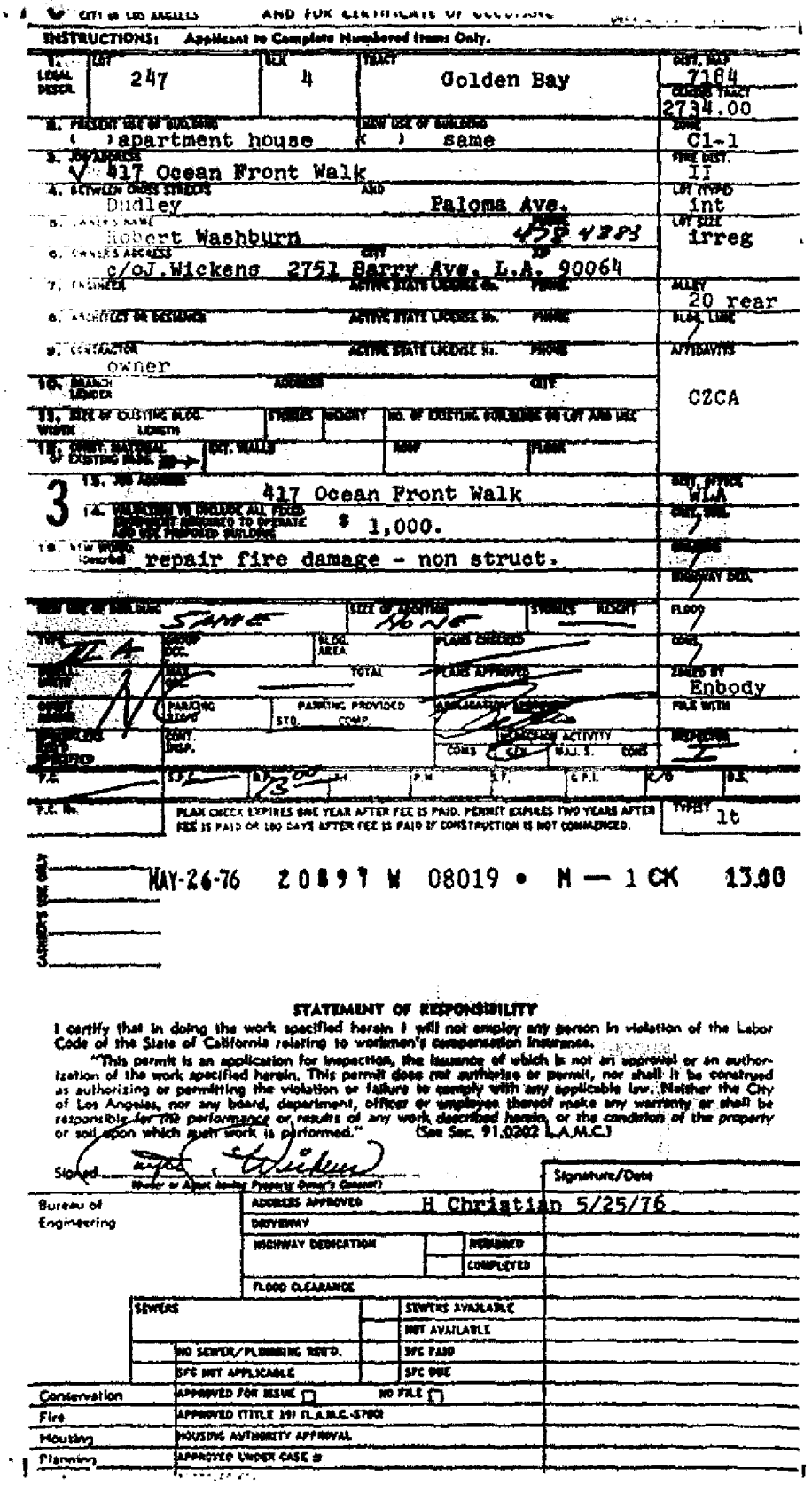
DISTRICT OFFICE VENICE DISTRICT

FOR DEPARTMENT USE ONLY

PLAN CHECKING	REINFORCED CONCRETE	FEES
Date ____	Bbls. Cement ____	Bldg. Per. 2.00
Receipt No. ____	Tons of Reinforcing Steel ____	Cert. of Occupancy ____
Valuation $ ____		
Fee Paid $ ____		Total ____

TYPE / GROUP	Maximum No. Occupants	Inside Lot / Corner Lot	Key Lot / Corner Lot Keyed	Lot Size 37.5 X 129	20 Ft. rear alley / X Ft. side alley / Clerk [signature]
PERMIT No. V11892	Plans and Specifications checked		Zone C-3	Fire District No. 2	District Map No. 7184
	Correction Verified		Bldg. Line ____ Ft.	Street Widening ____ Ft.	
	Plans, Specifications and Application rechecked and approved. [signature]		Application checked and approved [signature] Clerk		Stamp here when Permit is issued
PLANS	For Plans Fee / Filed with		Continuous Inspection	SPRINKLER Specified—Required Valuation Included Yes—No	Inspector DEC 21 1954
Rec'd. ____					

1976: Apartment



CITY OF LOS ANGELES — AND FOX CERTIFICATE OF OCCUPANCY

INSTRUCTIONS: Applicant to Complete Numbered Items Only.

1. LEGAL DESCR. LOT	247	BLK 4	TRACT Golden Bay	DIST. MAP 7184 / CENSUS TRACT 2734.00
2. PRESENT USE OF BUILDING ( ) apartment house		NEW USE OF BUILDING (X) same		ZONE C1-1
3. JOB ADDRESS V 417 Ocean Front Walk				FIRE DIST. II
4. BETWEEN CROSS STREETS Dudley		AND Paloma Ave.		LOT (TYPE) int
5. OWNER'S NAME Robert Washburn		PHONE 452 4383		LOT SIZE irreg
6. OWNER'S ADDRESS c/oJ.Wickens 2751 Barry Ave. L.A. 90064		CITY	ZIP	
7. ENGINEER		ACTIVE STATE LICENSE NO.	PHONE	ALLEY 20 rear
8. ARCHITECT OR DESIGNER		ACTIVE STATE LICENSE NO.	PHONE	BLDG. LINE
9. CONTRACTOR owner		ACTIVE STATE LICENSE NO.	PHONE	AFFIDAVITS
10. BRANCH LIBRARY	ADDRESS		CITY	CZCA
11. SIZE OF EXISTING BLDG. WIDTH / LENGTH	STORIES	HEIGHT	NO. OF EXISTING BUILDINGS ON LOT AND USE	
12. CONST. MATERIAL OF EXISTING BLDG. →	EXT. WALLS	ROOF	FLOOR	
3 13. JOB ADDRESS	417 Ocean Front Walk			DIST. OFFICE WLA
14. VALUATION TO INCLUDE ALL FIXED EQUIPMENT NECESSARY TO OPERATE AND USE PROPOSED BUILDING	$ 1,000.			CENSUS TRACT 7
15. NEW WORK (describe)	repair fire damage - non struct.			BUILDING
				HIGHWAY DIST.
NEW USE OF BLDG. Same	SIZE OF ADDITION No No	STORIES	HEIGHT	FLOOD
TYPE V-A	OCCUP. GROUP	BLDG. AREA	PLANS CHECKED	ZONE
FIRE ZONE N	NEW	TOTAL	PLANS APPROVED	ZONED BY Enbody
SPRINKLERS	PARKING REQUIRED	PARKING PROVIDED STD. COMP.		FILE WITH
ELECTRIC SERVICE	CONT. DISP.		DEMOLITION ACTIVITY CONES S.D.H. MAJ. S. CONES	INSPECTOR I
P.C.	S.F.	B.S. 13.00 P.M.	S.Y.	C.P.I. C/O	B.S.
P.C. No.	PLAN CHECK EXPIRES ONE YEAR AFTER FEE IS PAID. PERMIT EXPIRES TWO YEARS AFTER FEE IS PAID OR 180 DAYS AFTER FEE IS PAID IF CONSTRUCTION IS NOT COMMENCED.			TYPIST lt

CASHIER'S USE ONLY

MAY-26-76 20897 M 08019 • M — 1 CK 13.00

STATEMENT OF RESPONSIBILITY

I certify that in doing the work specified herein I will not employ any person in violation of the Labor Code of the State of California relating to workmen's compensation insurance.

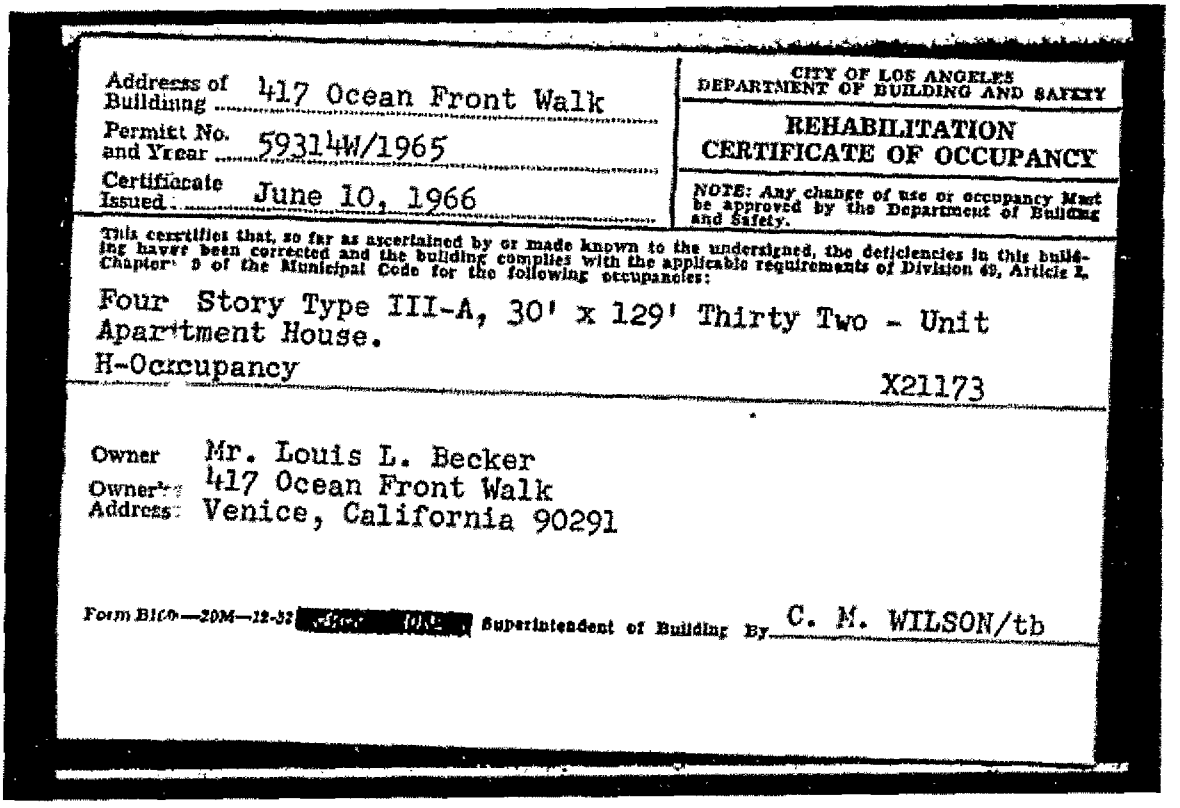
"This permit is an application for inspection, the issuance of which is not an approval or an authorization of the work specified herein. This permit does not authorize or permit, nor shall it be construed as authorizing or permitting the violation or failure to comply with any applicable law. Neither the City of Los Angeles, nor any board, department, officer or employee thereof make any warranty or shall be responsible for the performance or results of any work described herein, or the condition of the property or soil upon which such work is performed." (See Sec. 91.0202 L.A.M.C.)

Signed J. Wickens
(Owner or Agent Having Property Owner's Consent)

Signature/Date

Bureau of Engineering	ADDRESS APPROVED	H Christian 5/25/76	
	DRIVEWAY		
	HIGHWAY DEDICATION	REQUIRED	
		COMPLETED	
	FLOOD CLEARANCE		
	SEWERS	SEWERS AVAILABLE	
		NOT AVAILABLE	
	NO SEWER/PLUMBING REQ'D.	SFC PAID	
	SFC NOT APPLICABLE	SFC DUE	
Conservation	APPROVED FOR ISSUE ☐	NO FILE ☐	
Fire	APPROVED (TITLE 19) L.A.M.C.-57001		
Housing	HOUSING AUTHORITY APPROVAL		
Planning	APPROVED UNDER CASE #		

1966 Certificate of Occupancy- Apartment



Address of Building 417 Ocean Front Walk
Permit No. and Year 59314W/1965
Certificate Issued June 10, 1966

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY

REHABILITATION
CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy Must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the deficiencies in this building have been corrected and the building complies with the applicable requirements of Division 49, Article 1, Chapter 9 of the Municipal Code for the following occupancies:

Four Story Type III-A, 30' x 129' Thirty Two - Unit Apartment House.
H-Occupancy

X21173

Owner Mr. Louis L. Becker
Owner's Address 417 Ocean Front Walk
Venice, California 90291

Form B1C0—20M—12-52 [redacted] Superintendent of Building By C. M. WILSON/tb

Mr. Lambert is a powerful player in Venice real estate. Venice Waldorf LLC et Al bought 1207 Ocean Front Walk (5 Westminster) for $18, 238,682 million in July 2015, a building he has managed for several years.

We should not take any action by Mr. Lambert lightly. Many people are affected by Mr. Lambert's ambitions and have lost their homes. We are losing significant aspects of our community through his actions. The Ocean Front Walk has always been a mixed-use residential and commercial area and this balance has kept the community cohesive. Residents are the eyes, ears and hearts of community. We are invested in the welfare of all members, old, young, rich or poor, housed and unhoused. Displacing residents along the Ocean Front Walk has a negative effect on the visitor/ residential balance that is part of our unique coastal community.

One tenant at the December hearing on 417 OFW told the audience that Mr. Lambert had offered her $50K to move out of her apartment at 52 Paloma but she had told him that she preferred to stay. That is an indication of the treasury involved in privatizing the revenue of these properties in perpetuity.

All housing laws are designed to protect tenants.

Please support our laws. No hotels in our homes.

Mr. Lambert has converted 5 RSO apartment buildings in Venice into illegal hotels

417 Ocean Front Walk- 32 unit RSO apartments

THe Waldorf- 32 unit RSO apartments

2 Breeze- 31 unit RSO apartments

25 unit RSO apartments- Mr. Lambert sold this building recently but operated previously as Venice Admiral Suites

52 Paloma- 8 units RSO apartment- Mr. Lambert recently sold this building but operated previously Paloma Suites

Please Deny this application on the basis of the documented research.

1. Mr. Lambert is a serial operator of illegal conversion of RSO apartment buildings to hotels in Venice- 5 buildings.

2. Mr. Lambert is the President of the Venice Chamber of Commerce and sets a precedent for business practices in our community.

3. Mr. Lambert is a lawyer, broker and developer and should be a responsible business operator.

4. The Mello Act, Rent Stabilization Ordinance and zoning laws are laws, not open to interpretation.

5. We ask the Venice Neighborhood Council to uphold the law. We ask the Housing Department, Planning Department, Los Angeles City Council, CD 11 Councilmember Mike Bonin, and the City Attorney's Office to enforce the existing housing laws.

6. If this is all legal as Mr. Lambert asserts we would not be here.

Thank you for your consideration.

Rita Raskin
Laddie Williams
Pam Anderson
Ivonne Guzman
Lydia Ponce
Margaret Molloy
Cat Hernandez, Tongva
Gabriel Ruspini

Left: Mr. Lambert submitted this photo in his history of 417 Ocean Front Walk.
Right: Black people in Venice were restricted to the segregated area of the beach in Santa Monica known as Inkwell during this era.

Venice Publicity Photo, 1930's. Three of the original hotels are along Ocean Front Walk. *From Venice Historical Society Website – source, Security Pacific Bank Collection, LA Public Library.*

Caption reads "L to R: Bruce Willis, Albert Williams, Mark Ningleton, Willie Williams [illegible] segregated section of Santa Monica beach known as the Ink Well," ca. 1924. Shades of L.A. Collection, Los Angeles Public Library