

HARASSMENT FOR KEYS:

Illegal LLC Landlord Strategies in Los Angeles



July 2022



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About CCED

Chinatown Community for Equitable Development (CCED) is an all volunteer, multi-ethnic, intergenerational organization based in Los Angeles Chinatown that builds grassroots power through organizing, education, and mutual help. CCED was founded in March 2012 through the support of community activists, residents, business owners, workers, and youth, and was formed in the wake of the campaign to stop Wal-Mart from moving into Chinatown. Today, CCED organizes alongside the community to build a Chinatown with truly affordable housing, good jobs, a green environment, open recreational spaces, and quality education for all.

CCED first came into contact with Victoria Vu and Jerome Fink through organizing with the 920 Everett tenants. 920 Everett is a non-rent-controlled six-unit apartment building in the Los Angeles Chinatown and Echo Park area. Tenants at 920 Everett had received 60-day eviction notices from two previous landlords prior to the building being sold to 920 Everett Street LLC and being managed by VF Developments. While organizing with the 920 Everett Tenants Association and witnessing VF Developments' strategies of tenant harassment and negligence, CCED came in contact with tenants in other Vu and Fink buildings who were experiencing similar issues of deteriorating housing quality, neglect, and harassment.

Executive Summary

This report documents disrepair, code violations, and tenant harassment in 32 buildings owned and operated by Victoria Vu and Jerome Fink under Limited Liability Companies (LLCs). Through in-depth analysis of city inspection notes, General Manager's hearings, Rent Stabilization Ordinance (RSO) complaints, building permits, tenant testimony, and volunteer experiences, we identified a pattern of illegal construction without permits, illegal buyout offers and evictions, tenant harassment, and refusal to conduct maintenance as core strategies to push RSO tenants out of buildings to redevelop and rent out at a higher price. These issues are not unique to a building but show a consistent business strategy that targets buildings in gentrifying neighborhoods across Los Angeles, uses cash for keys offers and consistent harassment to get tenants to leave, weaponizes reduced housing quality and illegal construction to kick out the tenants who do not accept buyout offers, and redevelops the properties using unpermitted construction that later causes flooding, gas leaks, and electrical issues. This report also shows how Vu and Fink actively avoid accountability measures by conducting ineffective repairs, ignoring General Manager's hearings, and subverting permit regulations. **Taken together, this analysis shows a pattern of willful incompetence, targeted criminal negligence, and active tenant harassment. Victoria Vu and Jerome Fink use illegal strategies to exploit properties at the expense of tenant safety and habitability.**

Notable findings

Maintenance Issues

- Routine inspections have not been conducted for most buildings owned by Vu/Fink. Of the 32 buildings in this report, LAHD has conducted Systematic Code Enforcement Program (SCEP) inspections for only 15 of these buildings since Vu and Fink bought the building, noting 425 total violations. Three SCEP inspections went to a General Manager's hearing for failure to comply.
- Across 32 buildings, tenants and neighbors have reported 162 complaints to LAHD, one of which is currently open. Of these closed cases, 78 closed without a site visit.
- The most severe accountability measures LAHD uses are General Manager's hearings and the Rent Escrow Account Program (REAP). Even these measures have little effect on changing how Vu and Fink conduct business. Across the 32 buildings, 5 buildings have been or are currently in REAP since they were bought, and there have been 13 General Manager's hearings across 12 buildings. Four buildings have been referred to the City At-

torney who has taken no action regarding opening an investigation or filing misdemeanor charges.

Illegal Construction

- Vu and Fink buildings have 74 LAHD complaints across 14 buildings for conducting construction without permits. LADBS issued eight violations for substandard housing, five notices of construction in progress or completed without permits or inspections, and two violations for abandoned or vacant buildings left open to the public.
- Once Vu and Fink purchase the building, there is increased tenant turnover and vacancy. Through volunteer outreach and LAHD inspection notes, we identified three buildings that are fully vacant (701 N. Hill Pl., 900 W. College St., and 1139 Bellevue Ave.). Currently, some buildings only have a few tenants remaining (ex: 215 N. Fickett St., 2743 Fairmount St., 249 S. Coronado St., 1486 Silver Lake Blvd.). Other buildings (ex: 2422 Meadowvale Ave., 6307 Elgin St.) were completely vacated, Vu and her staff conducted illegal remodeling, with new tenants now living there and experiencing habitability issues

Tenant Harassment

- Vu, Fink, and their staff have a documented history of tenant harassment including graffitiing a building, yelling at and mocking tenants, and questioning tenants' immigration status. Even after the passage of the Tenant Anti-Harassment Ordinance, the Los Angeles Housing Department has done little to protect tenants from landlord harassment.
- Tenants also documented construction work from 7am to 9pm and construction on Sundays, which is illegal according to the city. When tenants asked construction workers to not do construction on weekends or late at night, to put away their tools and ladders, and to wear masks during a pandemic, contractors would respond aggressively, yell at tenants, or make fun of them.

Rent Stabilization Ordinance (RSO) Violations

- Along with housing code violations, Vu and Fink have 69 complaints for violating the Rent Stabilization Ordinance (RSO) in 18 buildings. Thirty-two of these complaints were for illegal evictions.
- Vu uses her office's disorganization and incompetence to violate tenant protection under the RSO. In multiple buildings, tenants were given eviction notices for failing to pay their rent even though they had documentation that they were consistently paying. After investigating, LAHD discovered that the landlord was returning rent checks, had failed to give

tenants the correct address to pay their rent or gave them multiple conflicting addresses, and then falsely accused tenants of nonpayment.

- LAHD documented 10 complaints for illegal rent increases across seven buildings, 13 complaints for illegal buyout agreements across 7 buildings, and 22 complaints for a reduction of services across 9 buildings.

These buildings are not simply in disrepair because they are old or due to prior landlords' neglect; once Vu and Fink take over the building, they and their staff actively destroy the housing stock by conducting construction without permits, refusing to conduct maintenance in a timely or effective manner, and failing to do simple property management like garbage removal and yard maintenance. While ignoring maintenance requests, strategies like tenant harassment, RSO violations, and attempted Ellis Act evictions are used concurrently to convince tenants to sign buyout offers. For the hundreds of complaints we know of, there are many more experiences from current or former Vu/Fink tenants that are undocumented due to tenant's fears of harassment and retaliation and lack of knowledge on the complaint process.

All levels of government have failed these tenants. LAHD inspectors have closed cases without inspections or site visits, General Manager's hearings take at least half a year to schedule, and unapproved construction is overlooked once retroactive permits are pulled without inspections. Tenants are left unaware of what happens to their complaints, REAP cases, and General Manager's hearings. The Department of Building and Safety and Health Department rarely cite issues that are rampant in the buildings. Tenants also experience bureaucratic shuffling when they try to make complaints, and are constantly told that this issue is not one department's jurisdiction but another's. Even when inspectors do note multiple and consistent violations at a building, LAHD assumes the landlord is making good faith efforts to fix these violations and give them multiple extensions, even when proven otherwise. There is minimal coordination beyond referrals between departments, or even within departments in LAHD (i.e. between housing code and RSO complaints) to address the holistic issues happening to tenants. When LAHD does forward cases to the City Attorney, there has been no investigation into the patterns of illegal activity or any accountability strategies against Vu and Fink's slumlord tactics. The Los Angeles City Council further enables illegal strategies by reducing funding for enforcement departments and failing to invest in potentially effective policies like the Tenant Anti-Harassment Ordinance (TAHO).

The illegal activities documented in this report are not unique to Victoria Vu and Jerome Fink, their network of LLCs, nor the multiple management companies and construction companies they have employed. These illegal activities are a wider strategy used by LLC landlords and other predatory landlords to evade responsibility and push out working class tenants to redevelop or resell property and subsequently rent at a higher price to

830 Bartlett St. taken in February 2019 and June 2021 (Source: Google Maps)



maximize profit. Vu and Fink are further enabled to use these illegal strategies because the city does little to enforce fair housing or tenant right policies. Our report on Vu and Fink shed light on illegal landlord practices in Los Angeles, how landlords actively evade responsibility, and how the current city practices and policies enable this behavior at the expense of tenants seeking safe, decent, and affordable housing in the city.

Demands

Through our analysis of Vu and Fink's LLC landlord strategies, we have compiled necessary actions the city must take to 1) hold Vu and Fink accountable for their illegal activity, 2) regulate LLC landlords and prevent the active and targeted destruction of affordable housing, and 3) improve LAHD's capacity to serve tenants.

- 1. The City Attorney must launch an investigation into the predatory behavior and illegal activity of Victoria Vu, Jerome Fink, VF Developments, and the Bascom Group and pursue civil and criminal charges. Vu and Fink cannot be allowed to hide behind their LLC's or the multitude of property management companies they have cy-**



1358 West 36th Street taken March 2019 and June 2021 (Source: Google Maps)

pled through. The city has a responsibility to address the hundreds of violations, history of non-compliance, tenant harassment, and illegal activity conducted by Victoria Vu and Jerome Fink. The City Attorney must take immediate action to investigate Vu and Fink and prosecute to the fullest extent of the law, and levy financial penalties for the hundreds of housing and construction violations. For illegal activity found, Vu and Fink's properties should be seized by the city and placed into a receivership, and landlords who violate city regulations should not be allowed to pull construction permits, purchase buildings for purposes of investment, and operate business as usual.

- 2. Reestablish, empower, and invest in the Interagency Slum Housing Task Force to investigate and file civil and criminal charges against predatory landlords.** The current enforcement of predatory and abusive landlords in the form of inspections, reinspections, hearings, and REAP is inadequate and does little to hold landlords accountable or correct their behavior. Landlords who repeatedly violate city policies and housing regulations must be held accountable and face escalating civil and criminal charges, and ultimately lose their right to own properties for the purpose of real estate investment if they continue to violate the law. Resurrecting and investing in a functioning Interagency Slum Housing Task Force would improve much-needed coordination between departments, as well as empower deputy attorneys to pursue criminal charges against abusive landlords.
- 3. Invest in and improve the Los Angeles Housing Department's policies and practices to better serve tenants, enforce housing codes, and protect affordable housing stock.** The Los Angeles Housing Department is both underfunded and ill-equipped to protect tenants, regulate landlords, and effectively coordinate with other agencies such as the Department of Health or Building and Safety. LAHD needs significant investment that will allow them to effectively conduct timely inspections, enforce code and regulations, deploy an accessible functioning complaint system, and track affordable housing stock.

Vulture Landlords During an Affordability Crisis

Los Angeles is currently on the precipice of a housing crisis. Every year, more residents become unhoused than permanent affordable units become available.¹ Currently, three out of four households in LA are rent burdened and half of the renters are severely rent burdened,² making LA the second most rent burdened metropolitan area in the country.³ In a recent survey, 49% of households reported that they were unable to pay their full rent during the pandemic.⁴ In 2020, the homeless count in Los Angeles county was over 66,000, a 12.7% rise from 2019.⁵ With the eventual lifting of COVID-19 emergency orders, scholars and policymakers predict a surge in evictions, displacement, and homelessness.⁶

At the same time, more tenants are experiencing poor living conditions. According to the Census Bureau's American Housing Survey, in 2019, 64,400 housing units in the Los Angeles-Long Beach-Anaheim area were considered severely inadequate and 153,000 are moderately inadequate.⁷ Along with these units, hundreds of thousands of units in Los Angeles had no working flush toilets (102,000), blown fuses or breakers (267,600), water stoppage (149,400), and mold (143,000). Additionally, 262,000 units had mice or rats in their homes and 619,000 had cockroaches within the last year. The problem of slum housing in Los Angeles is growing more desperate, with serious consequences for all Angelenos.

In the midst of a housing crisis, corporate landlords and developers have focused on redeveloping affordable units to build luxury apartments. In the wake of the foreclosure crisis, corporate landlords funded by private equity firms have become more prevalent.⁸ Corporate landlords are increasingly choosing to purchase properties under LLCs to prevent individuals from being personally liable for losses or accountability. As of 2015, 15 percent of rental properties in the US are owned by an LLC.⁹ As more and more properties become owned by LLCs, less work has been done to regulate this ownership model or hold the individuals behind these LLCs accountable for the destruction of safe and affordable housing.

1 Los Angeles Homeless Services Authority (LAHSA). 2020. "Greater Los Angeles Homeless Count Results

2 The American Community Survey (ACS) defines "rent burdened" as spending more than 30 percent of income on housing and "severely rent burdened" as more than 50 percent.

3 United States Census Department. 2018. American Community Survey (ACS), 5 year estimates.

4 Manville, Michael, Paavo Monkkonen, Michael C. Lens, and Richard K. Green. 2021. "End of the pandemic, but not renter distress." UCLA Lewis Center for Regional Policy Studies. <https://www.lewis.ucla.edu/research/covid-renter-distress-2021/>

5 LAHSA 2020

6 Blasi, Gary. 2020. "UD Day: Impending Evictions and Homelessness in Los Angeles." UCLA Luskin Institute on Inequality and Democracy. <https://escholarship.org/uc/item/2gz6c8cv>

7 United States Census Department. 2020. American Housing Survey (AHS).

8 Fields, Desiree. 2014. "The Rise of the Corporate Landlord: The Institutionalization of The Single-Family Rental Market and Potential Impacts on Renters." Right to The City Alliance. <https://homesforall.org/wp-content/uploads/2014/07/corp-landlord-report-web.pdf>

9 Census 2015

Corporate landlords are a threat to both the availability and quality of affordable housing; tenants with a corporate landlord are often at risk of rising rents as companies seek to maximize profits for investors and reduced housing quality as companies with little housing management experience begin managing properties.¹⁰ As Strategic Actions for a Just Economy (SAJE) has outlined, corporate ownership is related to “increased eviction and displacement, housing destabilization, extractive rents and gentrification, slum conditions, harassment and other unethical management practices, speculation, tax evasion, and vacancy.”¹¹ These issues are not the unintended consequences of the rise of corporate landlordism. They are built into the power dynamics between corporatized landlords and precarious tenants. An LLC strategy makes it more likely that buildings will be poorly maintained and allows landlords to extract enormous profits from tenants living in dilapidated properties.¹² Furthermore, when a property accumulates too many fines, landlords purchasing properties under an LLC can easily walk away from the building rather than face accountability.¹³

Researchers and journalists have documented numerous cases that highlight the growing trend of LLC landlordism as strategies for displacement. Aaron Mendelson’s research uncovered how Mike Nijjar owned 16,000 rental properties across 170 business entities.¹⁴ Tenants living in Nijjar’s LLC owned properties faced serious health risks including mold, mildew, rats, bedbugs, and life threatening fire and building hazards. Benjamin Teresa and Kathryn Howell’s research in Richmond, Virginia highlights how a company used financial threats, company mismanagement, and willful negligence to evict tenants.¹⁵ The company lost records, accused tenants of unpaid rent, illegally increased rent prices, and ignored tenants’ maintenance requests to pressure tenants to move out. Simultaneously, investigators noted high concentrations of code violations and unsafe structures in these buildings.¹⁶ Joel Montano’s research further highlights the contours of the eviction machine created by corporate landlords in Los Angeles, where predatory landlords strategically acquire property in vulnerable communities of color and use evictions as a first resort to rapidly redevelop properties.¹⁷

LLC landlords across the US use similar strategies to displace low-income tenants and rapidly raise rents while reducing housing quality. Strategies include:

- Targeting the acquisition of properties in low-income minority neighborhoods and proper-

10 Fields 2014

11 SAJE. 2020. “The Just Recovery Series: Beyond Wallstreet Landlords.” https://www.saje.net/wp-content/uploads/2021/03/Final_A-Just-Recovery-Series_Beyond_Wall_Street.pdf

12 Horner, James. 2019. “Code Dodgers: Landlord Use of LLCs and Housing Code Enforcement.” *Yale Law & Policy Review*, 37(2). https://ylpr.yale.edu/sites/default/files/YLPR/5_horner_code_dodgers.pdf

13 Horner 2019

14 Mendelson, Aaron. 2020. “Deceit, Disrepair and Death Inside a Southern California Rental Empire.” *LAist*. <https://laist.com/projects/2020/pama/>

15 Teresa, Benjamin and Kathryn Howell. 2021. “Eviction and Segmented Housing Markets in Richmond, Virginia.” *Housing Policy Debate* 31(3-5):627-646, DOI: 10.1080/10511482.2020.1839937.

16 Teresa and Howell 2021

17 Montano, Joel. 2021. Piercing the corporate veil of LLC landlordism.

ties subject to rent control regulations

- Violating rent control housing policies with unlawful rent increases and evictions, threatening and harassing tenants, and actively withholding information on tenants' rights
- Reducing housing services and actively neglecting maintenance repairs, impelling tenants to vacate properties by reducing their quality of housing
- Transforming buildings with exterior renovations to market luxury living for new tenants able to pay higher rents

Although their common strategies have been documented, LLC landlords are empowered to continue harassing tenants, destroying affordable housing, and reducing housing quality due to lack of accountability and enforcement from government agencies and policymakers. This report provides a case study of one such vulture landlord duo in Los Angeles, Victoria Vu (VF Developments) and Jerome Fink (Bascom Group), who uses poor maintenance and tenant harassment as strategies to remove long standing residents, destroy the affordable housing stock, and create a cycle of tenant turnover.

Victoria Vu and Jerome Fink's business strategy is not unique nor new but is the playbook for many landlords and developers in Los Angeles. Strategic Actions for a Just Economy have organized around tenant conditions including roach infestations, crumbling walls, and lack of hot water.¹⁸ The K3 Tenants Union have identified strategies a corporate slumlord, K3 Holdings, has taken to target and evict working-class communities of color including: aggressively harassing long standing tenants to accept cash for keys offers, conducting unpermitted construction while withholding repairs from long standing tenants, construction causing serious flooding and mold growth, and leasing poorly refurbished units at higher rates to new tenants.¹⁹ Landlords are empowered to continue these illegal and predatory practices due to a lack of accountability, coordination, and enforcement from the Los Angeles Housing Department, Los Angeles Department of Building and Safety, Los Angeles County Department of Health, the City Attorney's office, and the City Council. From our findings, we compiled a holistic set of policy demands to address the destruction of safe, decent, and affordable housing and tenant harassment that Vu/Fink tenants and many tenants across Los Angeles are facing.

¹⁸ Wagner, David. 2021. "Is LA Losing the Fight against Slum Housing?" LAist. <https://laist.com/news/housing-homelessness/housing-code-enforcement-los-angeles-la-county-east-compton-public-health>

¹⁹ K3Tenants Association. <https://www.k3tc.org/>

Methodology

This report outlines the history of 32 buildings owned and operated by Jerome Fink and Victoria Vu, many of which are under LLCs. We confirmed these LLCs are owned by Jerome Fink and/or Victoria Vu first by searching all properties on PropertyShark and then comparing the information to deeds for each building from the Los Angeles County Clerk and information from the Los Angeles County Assessor. Furthermore, we reviewed LLC documentation for each building to link the LLCs to Jerome Fink and Victoria Vu. The majority of the information in this report is publicly available and tracked by the Los Angeles Housing Department (LAHD) and the Department of Building and Safety (LADBS). Through California Public Records Act (CPRA) requests, we collected and analyzed data on all LAHD complaints and violations, Systematic Code Enforcement Program (SCEP) inspections, General Manager's hearings, Rent Escrow Account Program (REAP) cases, Rent Stabilization Ordinance (RSO) complaints and violations, and information submitted to the city's Rent Registry Program for each building since the property was sold to Jerome Fink and/or Victoria Vu. While the LAHD property activity report may note the same complaint under two case numbers, we counted a complaint if it has a unique case number. LAHD has the capabilities to check for duplicate complaints that we do not have since we only have access to public data. We also collected information on all complaints and violations from the Department of Building and Safety (DBS) and Department of Public Health (DPH). Given that many buildings are currently in the midst of inspections and complaints, for this report, we stopped tracking data on February 23, 2022. Additionally, we collected records on all permits filed and approved by LADBS for each building. Administrative data from the American Community Survey is also used to support our analysis of the neighborhoods Vu and Fink target.

The information on paper could only tell so much about the experiences of tenants who lived through these complaints and violations. Volunteers conducted outreach to tenants living in these 32 buildings to hear directly about their experiences living in these properties after the buildings were sold to Vu and Fink. All quotes and testimonies from tenants in this report are anonymized to protect tenants who fear retaliation and further harassment. Our outreach also does not document all the potential stories or violations that may exist in these buildings; some tenants were not available when we conducted our outreach and others did not want to participate due to fear of retaliation. A full investigation by the city and county would require manpower and language expertise for outreach that are out of our capabilities as an all-volunteer organization. As volunteers who have helped tenants across buildings understand housing policy, file complaints, attend General Manager's hearings, participate in SCEP inspection, and organize for livable conditions, etc., we also have first hand experience with Vu, Fink, and their staff and share our experiences in this report.

The Vu/Fink LLC Machine

The Muscle: Victoria Vu, VF Developments, and Casa Management

Victoria V. Vu is the founder and Managing Partner of VF Developments, LLC. Founded in 2015, VF Developments touts itself as a “trendsetting company specializing in the acquisition and re-development of poorly managed and distressed value-added multifamily properties.”²⁰ In partnership with Jerome Fink, the developer duo acquires apartment units with existing RSO tenants, then begins their process of tenant relocation and unit renovation. VF Developments paints these aspects of their business in a positive light and fails to mention the reality of their business strategy—targeting low-income communities, displacing tenants from their homes, and implementing subpar renovations. On the company webpage, Vu explicitly states that VF Developments targets “newly gentrifying urban walkable areas of Los Angeles.” Her website states that VF itself has acquired 17 multifamily properties totaling 92 units and a market value exceeding \$30 million. Vu is listed as either the Managing Partner or Agent for Service of Process for 30 LLCs mentioned in this report.



Victoria Vu (Source: victoria-vu-ythz.squarespace.com/victoria-venice-vu)

Despite having an expired real estate agent license,²¹ Vu is actively involved in “locating unique, off market opportunities, syndicating to investors, drawing design renderings, performing due diligence, preparing renovation budgets, negotiating tenant relocations, managing contractors and renovations, leasing to new residents, and ultimately selling the properties for high returns.”²² She is intimately involved in every aspect of the redevelopment process.



VF Developments
(Source: <https://www.facebook.com/VF-Developments-103313141120902/>)

Vu has employed a variety of different property management companies and contractors as she works to displace tenants and redevelop properties. Beginning in January 2022, Drake Real Estate Group told tenants that it managed some of the buildings owned by Vu and Fink. Most recently, properties were operated by Casa Management, another LLC created by Victoria Vu and managed by Christine Tran. Other companies that have managed the

²⁰ Vu, Victoria. “VICTORIA VENICE VU — VF Developments.” VF Developments, <https://victoria-vu-ythz.squarespace.com/victoria-venice-vu>

²¹ Victoria Vu’s real estate license 01982491 expired on January 10, 2021. Source: State of California Department of Real Estate

²² Vu, Victoria. “VICTORIA VENICE VU — VF Developments.” VF Developments, <https://victoria-vu-ythz.squarespace.com/victoria-venice-vu>

properties include VF Developments, South Pacific Real Estate, and JRealty. Tenants experience an extremely high turnover in property management companies and property managers, making it difficult for tenants to know who to contact for maintenance issues. LAHD has communicated with Victoria Vu as the property owner and her staff on multiple code violations and RSO complaints. Her companies and staff include Kim Vu, VF Developments, Casa Management and Linda Hollenbeck. Hollenbeck was Vu's former lawyer who worked on multiple attempted Ellis Act evictions and was present at some General Manager's hearings.



Caption: CASA Management (Source: <https://www.casapmgmt.com/>)

The Money: Jerome Fink and Bascom Group

Jerome A. Fink is a co-founder and Managing Partner of the Bascom Group. He also submitted the registration for 11 LLCs in this report and all LAHD violations mentioned in this report were sent to his personal address. Fink and his partners founded the Bascom Group in 1996 with the business model of “buying physically distressed apartment assets, investing in functional and operational renovations, and reselling the assets after a three- to five-year hold.”²³ Similar to VF Developments, Bascom Groups describes their work as sourcing value-added and distressed properties and repositioning them by adding extensive capital improvements, improving revenue, and reducing expenses by realizing operational efficiencies through implementation of institutional-quality property management. Bascom Group has completed over \$6.5 billion in multi-family and commercial value-added transactions since 1996 including more than 200 multifamily properties and 55,000 units. This approach brought Bascom success post-recession and beyond, and now Fink is applying this strategy to VF Developments as the company's primary funder.



Jerome Fink (Source: [bascomgroup.com](https://www.bascomgroup.com))

Fink and Bascom's strategy of buying physically distressed properties and implementing renovations is directly evident in his acquisition of properties in gentrifying areas across Los Angeles and work with VF Developments. As a developer, Fink shows active disdain for the City's building fees and affordable housing

²³ Wood, Chris. 2011. “The Bascom Company Looks to Operational Value-Add in Rent Lagging B and C apartment sectors.” <https://www.multifamilyexecutive.com/person/jerome-fink>

requirements. He notes in a panel at the USC Casden Multifamily Forecast Conference, “the challenge is, [the city] talk[s] to me about getting more housing, but then they go: here’s a fee, there’s a fee, you need 25% affordable [housing]...and by the way, you need unions to build it. And so the combination of all these things produces a cost that’s 20, 30 percent too high.”²⁴ Fink concedes that there’s no foreseeable way to circumvent these measures, on paper. Even with these high fees, rent growth is at an all time high. As Fink said in

October 2021, “revenue is growing so fast and high today that increasing expenses don’t mean much.”²⁵



Caption: BASCOM Group (Source: <https://lusk.usc.edu/membership/people/jerome-fink>)

Bascom Group perpetuates predatory development outside of Los Angeles as well. Bascom Group has a known history of evicting tenants in Texas. In 2002, the Bascom Group was brought to appeals court for allegedly destroying personal property, spraying haz-

ardous chemicals, and causing personal injury to a tenant. In another case in 2015, Bascom Group was sued for improper maintenance to its facilities that caused a tenant to slip and fall.²⁶ Along with Bascom Group, Jerome Fink is also linked to Chenco Holdings Company, the Southern California Industrial Fund, Rushmore Properties, Bascom Portfolio Advisors, Shubin Nadal Associates, Spirit Investors, and the Realm Group. Fink is also on the board of the USC Lusk Center for Real Estate.

Victoria Vu and Jerome Fink’s LLC Strategy

This report focuses on 32 buildings owned and operated by Victoria Vu and Jerome Fink. While we are aware that Fink and Vu own more properties, we focus on these buildings specifically because we were able to trace their property ownership, inspection history, and conduct tenant outreach. Table 1 outlines the buildings included in the report, the earliest building being purchased in 2016. In 2020 alone, Vu/Fink purchased six properties. The majority of these properties are owned under an LLC and we were able to trace each LLC to either Victoria Vu or Jerome Fink. All of these properties are relatively small buildings, with ten units or less and all but one (920 Everett) are protected under a Rent Stabilization Ordinance. Of these 32 properties, three buildings are currently in REAP and two properties (1486 Silver Lake Blvd., 6307 Elgin St.) were formerly in

²⁴ USC Price. 2019. “Reducing Development Costs: Making Rents Feasible for Southern California’s Workforce.” YouTube, <https://www.youtube.com/watch?v=uDTydo62Owc>

²⁵ Borland, Kelsi. 2019. “Good Investment Opportunity in Class-A New Builds”. Globe St., <https://www.globest.com/2019/10/30/good-investment-opportunity-in-class-a-new-builds/>

²⁶ California Housing Crisis and Domuso’s Predatory Lending. <https://www.liberationnews.org/california-housing-crisis-and-domuso-predatory-lending/>

REAP. Twelve buildings have had thirteen total General Manager's hearings due to Vu, Fink and their staff's failures to correct violations in a timely manner. Of these, three were triggered by a SCEP inspection, nine were due to complaints, and one was for failing to create a Tenant Habitability Plan.

Buildings Owned by Victoria Vu and Jerome Fink

| Building Address | Property Owner | Purchase Date | Neighborhood | Number of units | Subject to RSO | Date Placed into REAP | Date of General Manager Hearings |
|------------------------|--|---------------|-----------------|-----------------|----------------|-----------------------|----------------------------------|
| 141 San Pascual Ave. | 141 San Pascual Avenue LLC C/O Jerome A Fink | 9/6/2016 | Highland Park | 5 | Yes | | 11/18/2019 |
| 1321 W. 36th Pl. | 1321 W 36th Place LLC | 3/21/2017 | Pico-Union | 8 | Yes | | |
| 1486 Silver Lake Blvd. | 1486 Silver Lake Boulevard LLC C/O Jerome A Fink | 5/9/2017 | Silver Lake | 5 | Yes | 6/20/2019* | 7/15/2019, 8/21/2019 |
| 2422 Meadowvale Ave. | Jerome A Fink | 6/9/2017 | Elysian Valley | 3 | Yes | | 10/9/2019 |
| 1949 Park Grove Ave. | 1949 Park Grove Avenue LLC C/O Jerome A Fink | 7/24/2017 | Pico-Union | 9 | Yes | 7/5/2019 | 7/30/2019 |
| 215 N. Fickett St. | 215 N Fickett Street LLC | 8/25/2017 | Boyle Heights | 6 | Yes | | 9/30/2019 |
| 2743 Fairmount St. | 2743 Fairmount Street LLC C/O Jerome A Fink | 9/6/2017 | Boyle Heights | 6 | Yes | | 1/31/2019 |
| 2730 Raymond Ave. | 2730 Raymond Avenue LLC, C/O Jenna Fink | 10/13/2017 | Pico-Union | 9 | Yes | | |
| 249 S. Coronado St. | 249 S Coronado Street LLC C/O Jerome Fink | 12/21/2017 | West Lake | 8 | Yes | | 10/10/2018 |
| 2511 Pennsylvania Ave. | 2511 Pennsylvania Avenue LLC | 2/14/2018 | Boyle Heights | 6 | Yes | | 8/2/2019 |
| 1333 W. 36th Pl. | 1333 W 36th Place LLC C/O Jerome Fink | 3/27/2018 | Pico-Union | 8 | Yes | | |
| 627 Britannia St. | 627 Britannia Street LLC, C/O Jerome A Fink | 5/30/2018 | Boyle Heights | 5 | Yes | 7/30/2021 | 8/30/2021 |
| 5667 La Mirada Ave. | 5667 La Mirada Avenue LLC | 7/31/2018 | Hollywood | 8 | Yes | | |
| 955 N. Oxford Ave. | Vfd Oxford LLC | 10/23/2018 | Hollywood | 9 | Yes | | |
| 230 S. Carondelet St. | 230 S Carondelet Street LLC | 12/13/2018 | West Lake | 9 | Yes | | |
| 6307 Elgin St. | 6307 Elgin Street LLC C/O Jerome A Fink | 2/28/2019 | Highland Park | 7 | Yes | 12/4/2019* | 43766 |
| 830 Bartlett St. | 830 Bartlett Street LLC | 3/14/2019 | Chinatown | 6 | Yes | | |
| 1352 W. 36th St. | 1352 West 36th Street LLC | 6/19/2019 | Pico-Union | 7 | Yes | | |
| 1358 W. 36th St. | 1358 West 36th Street LLC | 6/25/2019 | Pico-Union | 6 | Yes | | |
| 2814 Sichel St. | 2814 Sichel Street LLC C/O Jerome Alan Fink | 7/11/2019 | Lincoln Heights | 7 | Yes | 8/31/2021 | 9/27/2021 |
| 2561 W. Ave. 30 | West Avenue 30 LLC C/O Jerome A Fink | 8/6/2019 | Glassell Park | 10 | Yes | | 1/15/2020 |
| 1023 Tremont St. | 1023 Tremont Street LLC | 10/4/2019 | Boyle Heights | 5 | Yes | | |
| 701 N. Hill Pl. | 701 N Hill Place LLC | 10/17/2019 | Chinatown | 5 | Yes | | |
| 410 Lucas Ave. | 410 Lucas Avenue LLC | 11/05/2019 | West Lake | 6 | Yes | | |
| 1139 Bellevue Ave. | 1139 Bellevue Avenue LLC | 11/13/2019 | Echo Park | 5 | Yes | | |
| 8777 Cadillac Ave. | 8777 Cadillac Avenue LLC C/O Jerome A Fink | 12/13/2019 | Reynier Village | 6 | Yes | | |
| 920 Everett | 920 Everett Street LLC | 1/17/2020 | Echo Park | 6 | No | | |
| 900 W. College St. | 900 W College Street LLC | 03/04/2020 | Chinatown | 8 | Yes | | |
| 2034 S. Garth Ave. | 2034 Garth LLC | 4/14/2020 | Crestview | 6 | Yes | | |
| 3512 La Clede Ave. | 3512 La Clede Avenue LLC C/O Victoria V Vu | 6/9/2020 | Atwater Village | 6 | Yes | | |
| 451 Coronado Terrace | 451 Coronado Terrace LLC | 09/16/2020 | West Lake | 8 | Yes | | |
| 3535 Ellsworth | 3535 Ellsworth Street LLC C/O Victoria Vu | 11/17/2020 | Echo Park | 6 | Yes | | |

Source: Los Angeles County Assessor

Table 1. Buildings Owned by Victoria Vu and Jerome Fink

Figure 1 maps the 32 buildings in the report and are organized by the purchase year. Vu and Fink target neighborhoods in and surrounding the downtown Los Angeles area and the University of Southern California (USC) campus, specifically in Atwater Village, Boyle Heights, Chinatown, Crestview, Echo Park, Elysian Valley, Glassell Park, Highland Park, Hollywood, Lincoln Heights, Pico-Union, Reynier Village, Silver Lake, and West Lake. These neighborhoods are majority-minority and with large proportions of immigrants, from 33 percent in Echo Park to 56 percent in Pico-Union. Residents in these neighborhoods are majority renters, from 56 percent of the neighborhood in Glassell Park to 95 percent of West Lake residents. Table 2 provides more detailed demographic information on these neighborhoods.

Map of Property Owned by Jerome Fink and Victoria Vu

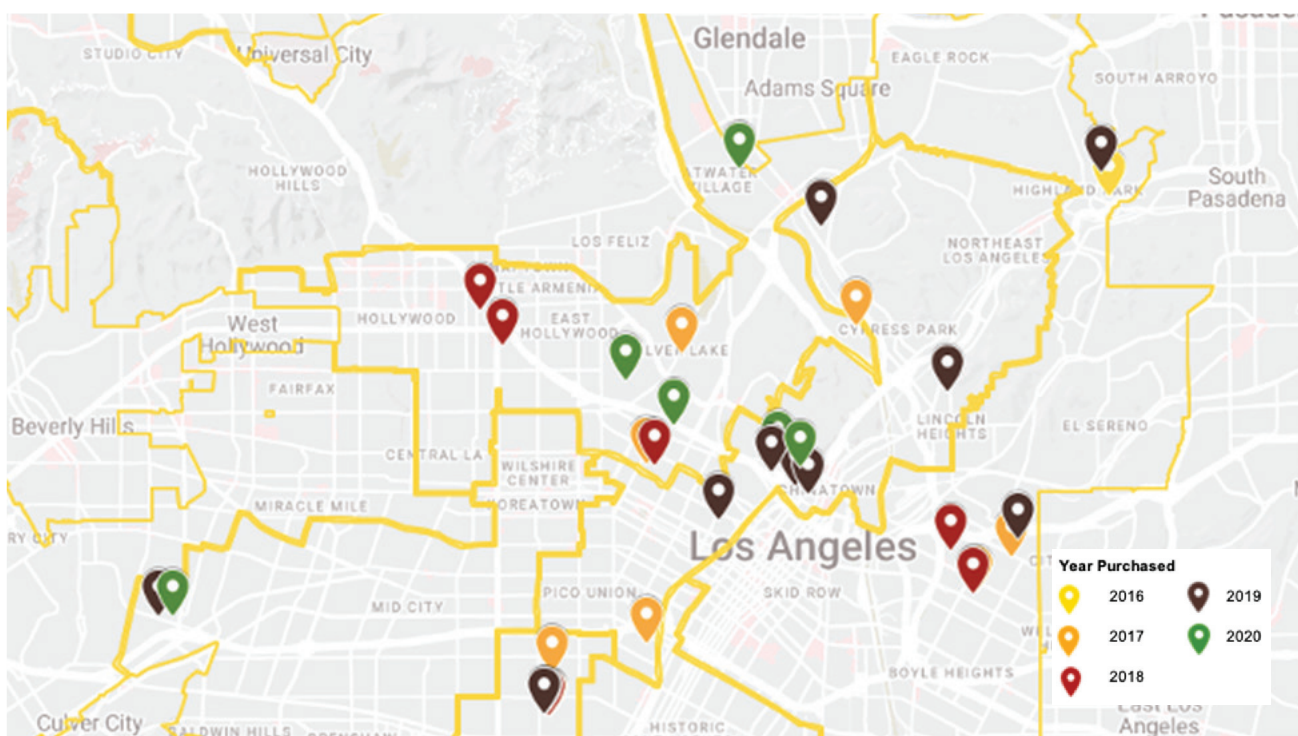


Figure 1. Map of Property Owned by Jerome Fink and Victoria Vu and Operated by Casa Management-
Note: The yellow outline represents the City Council district border.

Demographics

| Neighborhood | | Number of V u/ Fink Buildings | Population (2019) | Renter Rate (2019) | Median Household Income (2019) | % Poverty (2019) (below 100% poverty line) | % Immigrants (2019) | % Asian Population (2019) | % Black Population (2019) | % Hispanic Population (2019) | % White Population (2019) |
|-----------------|---|-------------------------------|-------------------|--------------------|--------------------------------|--|---------------------|---------------------------|---------------------------|------------------------------|---------------------------|
| Atwater Village | 1 | 12,275 | 60.48 | \$80,461 | 11.17 | 41.83 | 18.11 | 0.99 | 43.76 | 31.75 | |
| Boyle Heights | 5 | 90,158 | 74.91 | \$41,795 | 27.25 | 43.09 | 2.48 | 1.46 | 93.28 | 2.26 | |
| Chinatown | 3 | 15,602 | 93.96 | \$41,133 | 30.17 | 40.86 | 36.97 | 13.64 | 32.02 | 14.1 | |
| Echo Park | 3 | 34,843 | 74.69 | \$67,985 | 17.99 | 33.39 | 15.53 | 3.71 | 46.76 | 30.25 | |
| Glassell Park | 1 | 24,123 | 56.26 | \$68,827 | 14.93 | 39.33 | 18.3 | 1.87 | 57.74 | 19.64 | |
| Highland Park | 2 | 51,798 | 59.43 | \$62,438 | 16.22 | 37.35 | 11.05 | 1.64 | 66.6 | 17.82 | |
| Hollywood | 2 | 72,336 | 91.39 | \$50,913 | 21.03 | 38.99 | 7.62 | 7.21 | 36.32 | 44.62 | |
| Lincoln Heights | 1 | 29,692 | 73.7 | \$44,334 | 22.38 | 44.87 | 22.48 | 1.27 | 70.47 | 5.08 | |
| Pico-Union | 6 | 40,929 | 90.38 | \$35,599 | 28.84 | 55.67 | 10.59 | 2.94 | 82.25 | 3.57 | |
| Silver Lake | 1 | 30,714 | 64.52 | \$90,589 | 9.39 | 24.2 | 14.83 | 2.18 | 30.4 | 48.35 | |
| West Lake | 4 | 112,342 | 95.39 | \$39,290 | 30.84 | 55.13 | 18.19 | 4.91 | 67.89 | 7.22 | |

Source: American Community Survey, 5-year estimates

Table 2. Demographics

Victoria Vu and Jerome Fink's Business Strategy

Vu and Fink's Business Model



Figure 2. Vu and Fink's Business Model

Vu and Fink follow similar strategies as other LLC landlords in attempting to reduce costs and maximize profits through illegal and shoddy construction, allowing buildings to rapidly deteriorate by refusing to conduct maintenance, and charging higher rents to new tenants for cheap renovations. Although Vu highlights ultimately selling the properties for high returns as part of VF Development's work, we have not been able to identify any properties that she has successfully re-developed and sold. Across these 32 buildings, we identified a clear business model that destroys the number and quality of affordable housing in Los Angeles. Vu and Fink target properties in newly gentrifying neighborhoods,²⁷ buying RSO properties that are smaller buildings with fewer than ten units. After buying the property, Vu and her staff immediately offer cash for keys agreements and harass tenants to accept the offer through continuous calls and visits.

If a tenant does accept cash for keys offers, they are not able to return to their homes if they decide to revoke the agreement as Vu has already begun construction on vacant units. This construction is done without the required permits or inspections by LADBS. Construction is often delayed and stalled due to tenant complaints about illegal construction, continuous failure to pull the required permits for subsequent inspections, and continuous staff and contractor turnover that makes any permits given unusable. Despite high staff turnover, Vu and her contractors continue to conduct illegal construction even in the midst of LAHD inspections. Once construction is complete without the required inspections, Vu's management companies rent out properties that were formerly protected by an RSO at a higher price to new tenants by advertising renovated units with new features such as in-unit washer/dryer machines, new doorbells, gates, and security systems. Tenants who move into these "renovated" units begin to experience damages including mold, flooding, unusable outlets, and nonfunctioning doorbells and gates due to shoddy and illegal construction. When tenants contact Casa Management to address these maintenance issues, they are routinely ignored. Tenants will then cycle through the unit as frustrated tenants quickly move out and the property is rented to new, unsuspecting tenants.

RSO tenants who do not accept the cash for key offers begin to endure unbearable harassment in the form of active construction in other units in the building, property managers who quickly leave and refuse to conduct maintenance, and active harassment from Vu and her staff as they try to get tenants to sign cash for key offers. Constant staff turnover and changes in property management companies make it impossible for tenants to know who to contact for maintenance requests. Furthermore, general staff incompetence hinders tenant's safety and habitability; staff regularly fail to manage garbage disposal at buildings and leave yards unmanaged. **Vu uses her office's disorganization and incompetence to also violate tenant protection under the RSO. Tenants often are threatened with evictions for failing to pay their rent due to Vu's**

²⁷ Vu, Victoria. "VICTORIA VENICE VU — VF Developments." VF Developments, <https://victoria-vu-ythz.squarespace.com/victoria-venice-vu>

staff giving tenants multiple addresses to submit their rent, not giving the correct address to mail rent, or arbitrarily returning their rent. Vu also sends tenants illegal rent increases and illegal eviction notices, even in the midst of an eviction moratorium. If tenants do organize to improve their housing conditions, Vu and her staff retaliate through active harassment, destroying the properties, and further eviction attempts. All these tactics work to mentally, emotionally, and physically harm tenants. Through active harassment via loud construction, destruction of property and quality of housing, illegal eviction and rent increase attempts, and through active tenant harassment, Vu and her staff manage to force tenants to leave for their own safety and mental health.



830 Bartlett Street

*taken in February 2019 and June 2021
(Source: Google Maps)*

2511 Pennsylvania Ave.

*taken in September 2017
and December 2020 (Source:
Google Maps)*



Vu and Fink use illegal construction to rent units out at higher prices while reducing costs and government oversight. The construction focuses on 1) cosmetic changes to fit into a gentrifying aesthetic and 2) cheap fixes to add amenities she can charge new tenants for. This serves to reduce the quality of housing and also the number of affordable units in the city.

For new and old tenants, living in buildings owned and operated by Vu and Fink destroys their right to safe

and affordable homes free from landlord harassment. Substandard construction and construction without required permits both serve to harass tenants who fight to stay in their homes and create unsafe housing conditions for future tenants. Furthermore, Vu and Fink actively disregard housing code enforcement. Despite multiple inspections and General Manager's for failing to address habitability issues and conducting construction without permits, Vu and Fink continue the same business practices with minimal fear of accountability or enforcement. In the following sections, we outline how these business strategies play out to destroy 1) affordability, 2) safe and habitable housing, and 3) Los Angeles' housing stock.



2730 Raymond Street

***taken in September 2017 and
June 2021 (Source: Google
Maps)***

Destruction of Affordable Housing

As noted above, Vu and Fink target properties in gentrifying neighborhoods with large renter and immigrant populations. On average, 54 percent of residents in these neighborhoods are rent burdened and 27 percent are severely rent burdened. Despite the housing needs of these communities, Vu and Fink focus on buying rent stabilized buildings, displacing residents protected under the Rent Stabilization Ordinance (RSO), and renting the units at a drastically higher rate. This section highlights how Vu and Fink, as LLC landlords, exacerbate the affordability crisis by removing RSO units from the market. Furthermore, Vu and Fink actively seek to remove tenants living in units subject to RSO by violating tenant rights under RSO through illegal evictions, rent increases, and buyout offers. **We highlight how these strategies are used to remove tenants across multiple buildings and continue to be used even after being notified by LAHD that this behavior is illegal. These strategies should also be evaluated in relation to failure to conduct necessary maintenance, tenant neglect and harassment, and illegal construction as tools of tenant displacement.**

Figure 3 highlights the current listed rent price for Vu/Fink buildings compared to the median rent price in the neighborhood in 2010 and 2019. The listed rent price for Vu/Fink buildings is an average rent of the available units listed for rent. For neighborhoods like Boyle Heights, Chinatown, and Lincoln Heights, where over half of tenants are considered rent burdened, Vu/Fink's units are twice as high as the median rent value for the neighborhood. In Chinatown where 30 percent of residents are living in poverty and the median household makes \$3,400 a month, Casa Management is advertising units for \$2,500 a month. While we are not able to acquire the previous rent prices of the units, LAHD has the necessary information through the Rent Registry to conduct a thorough investigation into how Vu and Fink reduce the affordable housing stock in the city.

Vu and Fink are not simply a threat to affordable housing by renting out units at high prices; **their business model prioritizes purchasing rent stabilized buildings, removing long-standing tenants protected under the Rent Stabilization Ordinance (RSO) and thus removing any affordability protections within that unit.** As the RSO limits what the landlord can evict tenants for and how much they can increase rent, Vu and Fink's LLC machine targets these tenants to "voluntarily" vacate their units through buyout offers, threats of eviction, willful negligence to reduce their quality of living, and tenant harassment. Even when new residents paying higher rent prices move into these buildings, Vu, her staff, and any management company she employs put little effort into addressing tenant needs or concerns, leading to high vacancy and turnover rates. Table 3 highlights the number of vacancies and tenant turnovers for each building. This information is pulled from CPRA filings to LAHD's Rent Registry forms, which landlords are required to fill out annually for units subject to the Rent Stabilization Ordinance (RSO). Because LAHD redacts rent prices and unit num-

Rent Price Comparison by Neighborhood

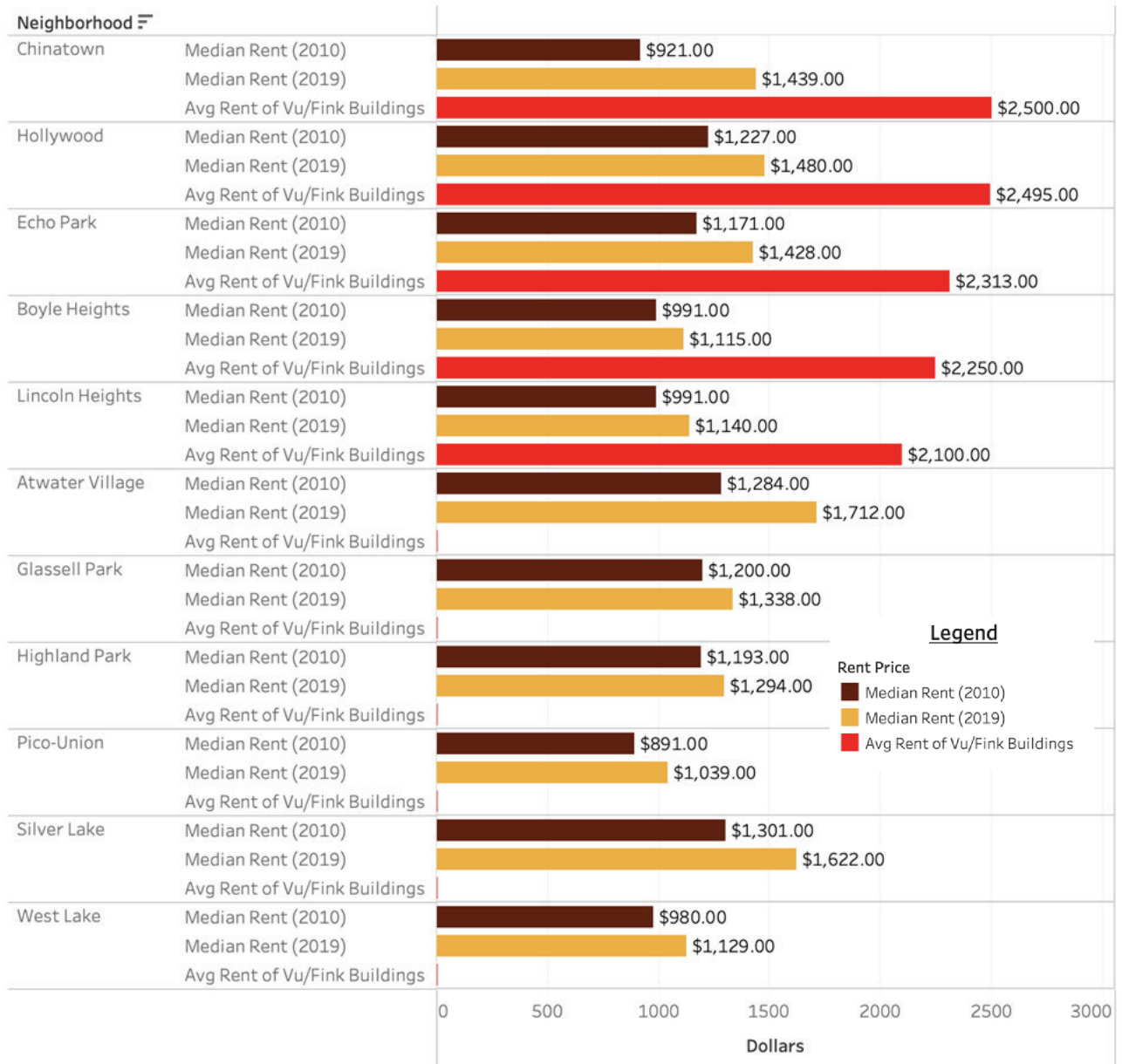


Figure 3. Rental Prices and Rent Burden by Neighborhood

Note: Some buildings do not have any units for sale, either because the unit has been rented out or the vacant unit is not currently available for rent.

bers for CPRA requests, we are unable to trace turnover and vacancy per unit. The city and LAHD can use these documents to investigate the full extent of turnovers and vacancies in these buildings as well as how many units are no longer subject to RSO.

The number of vacancies in Table 3 calculates the total number of vacant units reported in a Rent Registry over all the years the building has been owned by Vu and/or Fink. The number of turnovers was calculated by identifying every time a unit listed a new move-in date. These numbers may be an underestimation given the quality of data available from the Rent Registry Program and the responsibility of the landlord to consistently and correctly provide this information. Some of this information is also not available because either Vu has not submitted updated information to the Rent Registry Program or these units are no longer subject to the Rent Stabilization Ordinance (RSO). **From our access to the Rent Registry forms, we did not find any buildings with a 2021 Rent Registry form and many had missing 2020 forms.** Table 3 also notes which Rent Registry forms we were able to access. Despite the data quality, we were still able to identify multiple buildings that experienced tenant turnover in a majority of the units if not all units, including 2730 Raymond Ave., 2743 Fairmount St., 830 Bartlett St., 215 N. Fickett St., 1333 W. 36th Pl., 955 N. Oxford Ave., and 5667 La Mirada Ave. In some of these buildings, units experienced at least two turnovers within a year. From volunteer outreach conducted in September 2021, 701 N. Hill Pl. and 900 W. College St. were also vacant. According to LAHD inspection notes, 1139 Bellevue Ave. is also vacant.²⁸

²⁸ 1139 Bellevue Ave. was considered vacant on December 14, 2021 when an inspector visited the building to conduct an inspection for complaint case #784851.

Tenant Turnover and Vacancy Rate by Building

| Building Address | Purchase Date | Number of units | Total number of vacancies | Number of turnovers | Rent Registry provided through CPRA |
|------------------------|---------------|-----------------|---------------------------|---------------------|-------------------------------------|
| 141 San Pascual Ave. | 9/6/2016 | 5 | 3 | 6 | 2018, 2019, 2020 |
| 1321 W. 36th Pl. | 3/21/2017 | 8 | 4 | 5 | 2017, 2018, 2019, 2020 |
| 1486 Silver Lake Blvd. | 5/9/2017 | 5 | 2 | 1 | 2017, 2018, 2019, 2020 |
| 2422 Meadowvale Ave. | 6/9/2017 | 3 | 1 | 4 | 2018, 2019, 2020 |
| 1949 Park Grove Ave. | 7/24/2017 | 9 | 1 | 3 | 2018, 2019, 2020 |
| 215 N. Fickett St. | 8/25/2017 | 6 | 0 | 7 | 2018, 2019, 2020 |
| 2743 Fairmount St. | 9/6/2017 | 6 | 3 | 8 | 2018, 2019, 2020 |
| 2730 Raymond Ave. | 10/13/2017 | 9 | 1 | 10 | 2017, 2018, 2019, 2020 |
| 249 S. Coronado St. | 12/21/2017 | 8 | 7 | 4 | 2018, 2019, 2020 |
| 2511 Pennsylvania Ave. | 2/14/2018 | 6 | 1 | 2 | 2018, 2019, 2020 |
| 1333 W. 36th Pl. | 3/27/2018 | 8 | 2 | 11 | 2017, 2018, 2019, 2020 |
| 627 Britannia St. | 5/30/2018 | 5 | 1 | 0 | 2018, 2019, 2020 |
| 5667 La Mirada Ave. | 7/31/2018 | 8 | 3 | 5 | 2018, 2019, 2020 |
| 955 N. Oxford Ave. | 10/23/2018 | 9 | 3 | 6 | 2019, 2020 |
| 230 S. Carondelet St. | 12/13/2018 | 9 | 6 | N/A | 2018, 2019, 2020 |
| 6307 Elgin St. | 2/28/2019 | 7 | 0 | 0 | N/A |
| 830 Bartlett St. | 3/14/2019 | 6 | 2 | 9 | N/A |
| 1352 W. 36th St. | 6/19/2019 | 7 | 1 | 0 | 2018, 2019, 2020 |
| 1358 W. 36th St. | 6/25/2019 | 6 | 1 | N/A | N/A |
| 2814 Sichel St. | 7/11/2019 | 7 | N/A | N/A | N/A |
| 2561 W. Ave. 30 | 8/6/2019 | 10 | 4 | N/A | N/A |
| 1023 Tremont St. | 10/4/2019 | 5 | N/A | N/A | N/A |
| 701 N. Hill Pl. | 10/17/2019 | 5 | 3 | 0 | N/A |
| 410 Lucas Ave. | 11/05/2019 | 6 | 0 | 0 | N/A |
| 1139 Bellevue Ave. | 11/13/2019 | 5 | N/A | N/A | Undated |
| 8777 Cadillac Ave. | 12/13/2019 | 6 | N/A | N/A | 2020 |
| 920 Everett | 1/17/2020 | 6 | 1 | 0 | N/A |
| 900 W. College St. | 03/04/2020 | 8 | 4 | 0 | Undated |
| 2034 S. Garth Ave. | 4/14/2020 | 6 | 1 | 2 | N/A |
| 3512 La Clede Ave. | 6/9/2020 | 6 | N/A | N/A | N/A |
| 451 Coronado Terrace | 09/16/2020 | 8 | 0 | N/A | N/A |
| 3535 Ellsworth | 11/17/2020 | 6 | N/A | N/A | 2020 |

Table 3. Tenant Turnover and Vacancy Rate by Building

Beyond violating reporting requirements, Vu and Fink violate tenant rights under RSO. Figure 4 details the number of RSO complaints for each building in relation to when they were filed and to when the building was purchased. Since coming under Vu and Fink's ownership, LAHD has collected 69 RSO complaints in 18 buildings. Tenants in 10 buildings reported 32 complaints for illegal evictions. Some complaints were reported as early as two months after Vu took over a building and continued to today as Vu persists in attempting to evict tenants during the local and state emergency period. In multiple buildings, tenants were given eviction notices for failing to pay their rent even though they had documentation that they were consistently paying. After investigating, LAHD discovered that the landlord was either returning rent checks or had failed to give tenants the correct address to pay their rent and then was accusing them of nonpayment. Through her staff's willful neglect, tenants were put at risk of being evicted even though they had been paying rent. **This is not just a case of incompetence; Vu and Casa Management have been notified of this illegal behavior in multiple buildings and continue to enact these practices, showing their complete disregard for proper property management protocols and tenant rights.** In other instances, Vu and her staff gave tenants verbal notices to tenants that they were being evicted, in violation of the Rent Stabilization Ordinance. LAHD also documented 10 complaints for illegal rent increases across 7 buildings, 13 complaints for illegal buyout agreements across 7 buildings, and 22 complaints for a reduction of services across 9 buildings. As our case studies will show, RSO violations often occurred around the same time as code violations; Vu and her staff were simultaneously violating tenants' rights under RSO while also reducing their quality of housing. **Investigating RSO violations must happen in conjunction with citing housing code violations as both are strategies to harass tenants and force them out of the building.** Furthermore, Vu and Fink use RSO violations as a means to get tenants to vacate the building. The city must investigate how they actively work to reduce the amount of affordable units in the building and how RSO violations are used along with code violations to reduce tenants' quality of living.

RSO Purchase and Complaint Dates

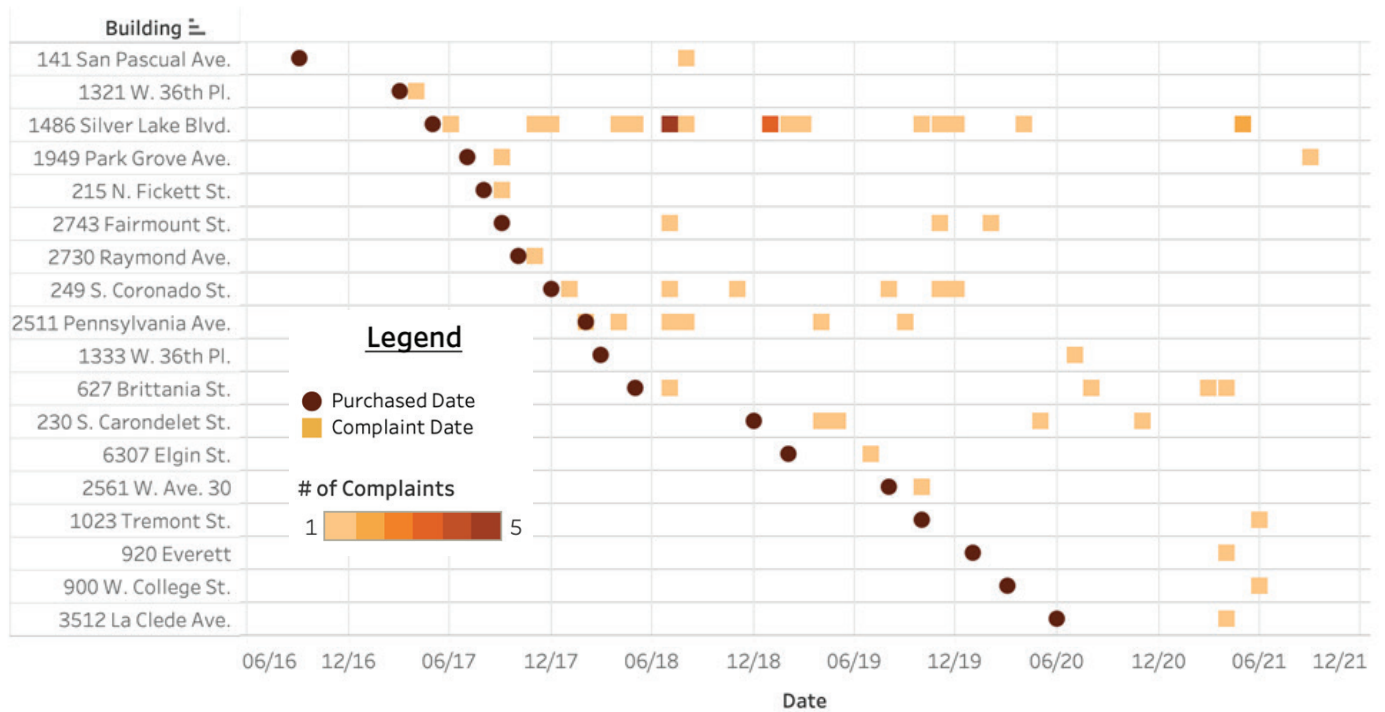


Figure 4. Purchase Date and Rent Stabilization Ordinance (RSO) Complaint Dates by Building

Destruction of Safe and Habitable Housing

Poor housing conditions negatively impact both the physical and mental health of tenants, and is of particular concern for communities of color, low-income families, immigrant families, and children.²⁹ Mold is linked with upper respiratory tract symptoms, coughing, and wheezing in otherwise healthy people.³⁰ Particulate matter from cockroaches and dust from construction can exacerbate eczema and asthma. Lack of proper ventilation or air conditioning can lead to heat related illness. Furthermore, slum-conditions and slumlord harassment negatively affects mental health and can lead to anxiety and depression.³¹ Slumlord tactics such as refusing to perform maintenance, utilizing unsafe construction practices, and harassing tenants actively harm tenants' physical and mental health. Given the lack of time or money slumlords and LLC landlords put into maintaining safe and habitable housing, both the Los Angeles Housing Department and Los Angeles County Health Department must proactively enforce safety and habitability issues and productively work in collaboration between health and housing inspectors to properly regulate habitability issues.

When discussing issues including mildew, vermin, and mold, LAHD inspectors told tenants and organizers that these issues were the responsibility of the Health Department, that either tenants had to call the Health Department themselves or that LAHD inspectors would refer issues to the department. Tenants who were told their cases would be referred often did not hear further about their case afterwards. Despite a history of enforcing slumlord and housing conditions that affect tenants' health and safety, the Health Department currently overlooks and underenforces multifamily housing units and health issues within those buildings. When speaking with tenants, many said that their main request is that the housing and health departments inspect all the properties and talk to tenants about their actual experiences in the building and with management, outlining issues of mildew, mold, vermin, flooding, etc., that affects their health and wellness.

We analyze safety and habitability issues using the history of code violations found through LAHD housing complaints and Systematic Code Enforcement Program (SCEP), General Manager's hearings, and REAP cases in these buildings. We also include findings from tenant outreach as tenants may have had issues that they did not report to LAHD or the Health Department for a variety of reasons including: fear of retaliation, lack of knowledge on how to submit a complaint, or deciding to pay for repairs out of pocket. Evaluating code violations across buildings allows us to trace patterns in Vu and Fink's business model that relies on ignoring code violations and maintenance requests. **Through our analysis of tenant testimonies and LAHD and**

29 Stacy, Christina, Joseph Schilling, and Steve Barlow. 2018. "Strategic Housing Code Enforcement and Public Health: A Health Impact Assessment in Memphis, Tennessee". Urban Institute.

30 CDC. "Basic Facts about Mold and Dampness." <https://www.cdc.gov/mold/faqs.htm>

31 Stacy et al. 2018, page 8, Evans, Gary W., Nancy M. Wells, and Annie Moch. 2003. "Housing and Mental Health: A Review of the Evidence and a Methodological and Conceptual Critique. *Journal of Social Issues* 59(3)475-500. DOI: <https://doi.org/10.1111/1540-4560.00074>

Health Department documentation, we find that Vu and Fink actively ignore health and safety issues, allowing even minor issues such as trash collection and yard maintenance to become safety and habitability issues. Furthermore, even when LAHD cites housing code violations through complaints or SCEP inspections, the enforcement process is often delayed and when cases are closed, the same violations occur repeatedly, at the expense of tenants' safety.

Trends in Tenant Complaints

Since the time that Vu and Fink took over these properties, LAHD recorded 162 unique complaint cases, including one utility complaint, and five emergency Urban Repair Program (URP) complaints. When an official complaint is described, we reference the case number but also use the term 'complaint' colloquially when LAHD inspectors note specific complaints within a case. We stopped tracking violations after February 23, 2022. Currently, one complaint is open and issues remain across buildings that may facilitate further complaints.

When evaluating the Health Department's records on these buildings, we found that the level of citations they cited were much lower than LAHD. The Health Department has conducted 12 complaint inspections in 10 buildings and 31 routine inspections in 23 buildings. From these inspections only 45 violations have been cited for damaged common area walls/ceilings, overflowing garbage, and issues with walls, ceilings, floors, stairs, and tubs. Seven complaint inspections and sixteen routine inspections showed no violations.

Figure 5 displays the 162 complaints made by the date the complaint was made and by how many issues were reported in each complaint. From the beginning when Vu and Fink purchased and began managing the property to today, issues regarding habitability, sanitation, and illegal construction have plagued tenants. Throughout this time, 1486 Silver Lake Blvd., 249 S. Coronado St., and 1949 Park Grove Ave. had the most complaints and all three of these buildings have had General Manager's hearings (1949 Park Grove Ave. is currently in REAP and 1486 Silver Lake Blvd. was formerly in REAP). However, many of these complaints were made after the General Manager's hearings, indicating that issues in the buildings persist. In 2021 alone, tenants and neighbors reported 42 code complaints to LAHD.

The scatter plot displays the daily count of issues received over a five-year period. The y-axis, labeled 'Number of Issues', ranges from 0 to 25 in increments of 5. The x-axis, labeled 'Day of Complaint Received', spans from 2017 to 2021. Red circular markers represent the daily issue counts. Many markers are labeled with their specific values. The data shows a significant peak of 24 issues in early 2018 and another peak of 19 issues in early 2021. There are also several days with zero issues throughout the period.

| Year | Day of Complaint Received (approx.) | Number of Issues |
|------|-------------------------------------|------------------|
| 2017 | 10 | 3 |
| 2017 | 15 | 22 |
| 2017 | 20 | 13 |
| 2017 | 25 | 6 |
| 2017 | 30 | 7 |
| 2017 | 35 | 5 |
| 2017 | 40 | 7 |
| 2017 | 45 | 4 |
| 2017 | 50 | 4 |
| 2017 | 55 | 2 |
| 2017 | 60 | 2 |
| 2017 | 65 | 2 |
| 2017 | 70 | 2 |
| 2017 | 75 | 2 |
| 2017 | 80 | 2 |
| 2017 | 85 | 2 |
| 2017 | 90 | 2 |
| 2017 | 95 | 2 |
| 2017 | 100 | 2 |
| 2017 | 105 | 2 |
| 2017 | 110 | 2 |
| 2017 | 115 | 2 |
| 2017 | 120 | 2 |
| 2017 | 125 | 2 |
| 2017 | 130 | 2 |
| 2017 | 135 | 2 |
| 2017 | 140 | 2 |
| 2017 | 145 | 2 |
| 2017 | 150 | 2 |
| 2017 | 155 | 2 |
| 2017 | 160 | 2 |
| 2017 | 165 | 2 |
| 2017 | 170 | 2 |
| 2017 | 175 | 2 |
| 2017 | 180 | 2 |
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| 2017 | 645 | 2 |
| 2017 | 650 | 2 |
| 2017 | 655 | 2 |
| 2017 | 660 | 2 |
| 2017 | 665 | 2 |
| 2017 | 670 | 2 |
| 2017 | 675 | 2 |
| 2017 | 680 | 2 |
| 2017 | 685 | 2 |
| 20 | | |

Figure 6 breaks down the length of time it took LAHD to close each case. 37 cases were closed within a day. Of these, 28 were closed without a site visit, affecting 11 buildings. These complaints included issues of construction performed without permits, vacant units not secure, broken windows or doors, blocked plumbing, etc. Of the 53 complaints closed within a week, 42 were closed without a site visit. Of the 161 total complaints, 15 cases in 11 buildings took over 120 days to close, with the longest case taking 549 days (1486 Silver Lake Blvd.).³² Nine of these cases were later referred to the enforcement section, indicating that extended case times did not serve to resolve issues for tenants. For these 15 cases, tenants had to deal with a myriad of issues while waiting for LAHD to get the landlord to comply including:

- 32 Case #687598

- Defective or deteriorated roofing material
- Defective or unapproved floors, stairways, and/or railings
- Defective, broken, or missing light fixture(s)
- Electrical wiring disconnected and/or abandoned

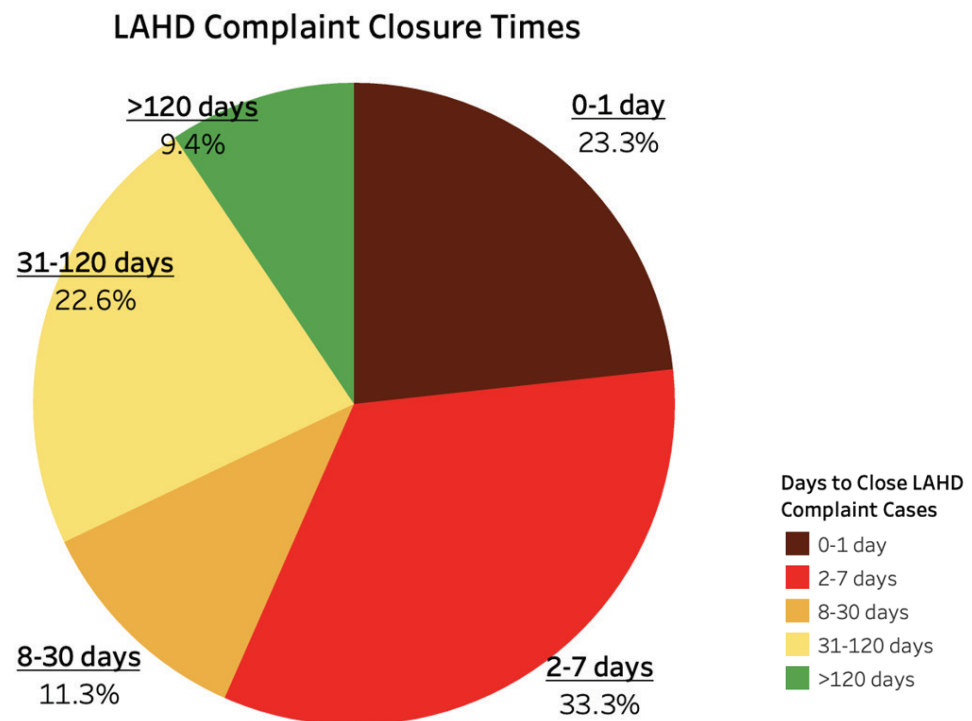


Figure 6. Length of time to close LAHD complaints

The issues listed above did not just affect the most egregious cases but consistently came up in complaints across buildings. When analyzing the 162 complaint cases, we also counted each individual issue within a complaint and grouped them into 17 general violation categories based on how LAHD organizes types of violations. Table 5 highlights the total number of issues noted by tenants by violation category and how many buildings had these types of complaints. For 162 unique complaints, tenants reported a total of 479 issues in 26 buildings. The most complaints were made regarding sanitation (82 complaints across 19 buildings), illegal construction (74 complaints in 14 buildings), and maintenance (59 complaints in 12 buildings). Below we go into detail around patterns of code violations that affect tenant habitability, health, and safety and include tenant testimonies.

Number of Total Issues Documented

| Violation Category | Total number of issues documented in complaints | Number of unique buildings |
|-----------------------------|---|----------------------------|
| Sanitation | 82 | 19 |
| Illegal Construction | 74 | 14 |
| Maintenance | 59 | 12 |
| Habitability | 40 | 14 |
| Tenant Habitability Program | 39 | 8 |
| Plumbing | 35 | 14 |
| Miscellaneous | 28 | 12 |
| Electrical | 22 | 11 |
| Heating and Ventilation | 20 | 9 |
| Nuisance Conditions | 16 | 5 |
| Fire Safety | 16 | 7 |
| Zoning Violation | 14 | 5 |
| Weather Protection | 14 | 4 |
| Structural Hazards | 8 | 5 |
| Historical Preservation | 5 | 2 |
| Unapproved Use or Occupancy | 4 | 2 |

Table 4. Number of Total Issues Documented in Complaints by Violation Category

Safety Issues

Tenants in multiple buildings expressed that their biggest concern with VF Developments and Casa Management was how they made buildings unsafe. Tenants in 11 buildings made 20 complaints that the building was unsafe and/or unclean. Tenants at four different buildings also expressed to CCED volunteers that they had loose doorknobs and broken gates that either could not lock or were removed. For gates needing to be fixed, tenants described having to wait almost five months for maintenance. As a result, tenants were fearful of people breaking into the building and living in the vacant units. Tenants made multiple safety related complaints to LAHD including stairway, walkway, or decking material requires maintenance (9 complaints), premises not maintained in a safe and sanitary condition (9 complaints), unit in unsafe and/or unclean condition (7 complaints), electrical service requires maintenance (5 complaints), and defective or missing plumbing or gas facilities (5 complaints).

For units that were vacated through cash for keys offers, construction work posed a risk to the safety of tenants who remained. Tenants detailed multiple experiences where construction workers left tools and ladders outside and tenants worried that these tools could be used to gain access to the building. Furthermore, tenants detailed experiences where construction work affected safe and adequate lighting. One tenant detailed how construction workers shut off lights outside of the building for weeks, making it too dark and dangerous to walk outside at night. As a result, tenants in four buildings made six complaints to LAHD that there was a lack of 24-hour illumination in all hallways, stairways, and required exit ways and four complaints for lack of required amounts of light and ventilation.

Beyond active issues with the building, tenants expressed general concern about the way vacant units were secured and maintained. Tenants in 4 buildings made 13 complaints to LAHD that vacant units were not secure, unclean, and/or unsanitary. In multiple buildings, tenants expressed to us how security cameras that were marketed as amenities of the building were not plugged in nor functional. Additionally, tenants in two buildings outlined experiences where squatters lived on the property and stairwell because vacant units were left open. The Department of Building and Safety also cited two violations for abandoned or vacant buildings left open to the public.

Trash and Debris



Trash from construction outside of property of 410 Lucas Avenue (Source: CCED Volunteer Outreach 10/12/21)



Trash overflowing and open storage of wrought iron security gates and bars at 6307 Elgin St (Source: LAHD Inspection 5/17/2019)

Along with safety issues, construction and mismanagement created health and sanitation issues for tenants. Tenants told us multiple stories of how contractors filled trash cans and left trash in the parking area and on the lawn, and that tenants could not discard their trash. Furthermore, property management companies would not

pay for garbage services or take out the trash so trash would pile up and not get picked up regularly. Tenants would end up being responsible for removing the garbage themselves. This created health and safety issues for tenants as they would see more insects and rodents from the trash and also have to live with discarded construction materials on their lawn.

Tenants notified LAHD of these issues. In 10 buildings, tenants filed 18 complaints about trash, debris, and discarded items on the premises, five complaints about insect, vermin, and/or rodent infestations, and four complaints about the lack of adequate number of receptacles for garbage.

“I’ve been living here since 2000. This place has not looked like this. Everybody here pays their rent. I understand there’s a pandemic but that’s no cause for this place to look the way it looks. There’s no cause. I’m a respectful person. I work every day. We work. My son works. There’s no cause for why this place looks like this.” Tenant Testimony

Water Issues

Tenants in multiple buildings also experienced issues with leaking, flooding, and clogged drains that were ignored for weeks or not fixed at all. Two tenants outlined how sinks and bathtubs were clogged for weeks and they had to eventually pay for a plumber to fix them. Tenants in five different buildings told us about issues with water leaks that affected their own units and the building as a whole. For some tenants, water damage in another unit was not fixed and would affect the tenant’s unit, creating mold and fungus.³³ Unsafe ceilings would cause leaks into the unit below. One building had a water leak that affected an apartment’s powerbox, creating an electrical hazard for tenants. Often these issues were not just a result of an old or decaying plumbing system but were caused by poor workmanship during construction or shoddy maintenance. For two buildings, illegal construction created water leaks that went into tenants’ units. At another building, exposed pipes created flooding and water issues that took months to fix. Tenants at multiple buildings detailed flooding that would happen when someone used an in-unit washer/dryer machine. From our analysis of LAHD inspection notes, multiple inspectors noted that in-unit washer/dryers in Vu/Fink buildings were installed without permits.



Holes in wall and ceiling of unit (Source: Email from tenant to LAHD RSO department)

³³ Inspections at 627 Britannia St. and 2422 Meadowvale Ave. noted that leaking from pipes caused mold and fungus to grow

As a result, tenants in six buildings made eight complaints about inadequate, unapproved, or missing water supply and eight complaints about a lack of adequate flow of hot and/or cold running water. Tenants in nine buildings made fifteen complaints to LAHD about leaking or defective plumbing. Our case study of 1949 Park Grove Ave. goes into further detail of how VF Development installed laundry units without permits, causing water damage and further habitability issues for tenants.

“So on a Monday I came into my kitchen and the water was coming out of the kitchen sink. So I submitted a request on their portal but at that point it was the afternoon so I didn’t think anyone was going to get back to me. The next day, Tuesday, the same thing. No one got back to me. The sink was still full of black water. And then by Wednesday, I realized that my neighbor was also having a similar issue. And when she turned on her disposal, my apartment started flooding through the washer dryer line. And at this point I was already calling that maintenance line like six times a day. But it’s like a third company so all they could do was send it to the maintenance people. They couldn’t give me any other answer. The maintenance people weren’t calling me to come and fix it. So then by Thursday, I had already cleaned up all the flooding. It happened again. I had to clean it up again so I decided to just call a plumber. The plumber came out that same day and fixed it in like an hour. [...] The plumber said all he could do was snake the line but they probably needed to hydro flush the whole plumbing here cause it was all backed up. [The management company] didn’t say anything after that. But that issue has happened three times since I moved in.” Tenant Testimony

Hazardous Issues

Further egregious issues posed a threat to tenants’ health and safety. Tenants in one building detailed three or four recent gas leaks that needed fixing and then were left with no gas. Construction work left holes in the roof and shoddy piping that was covered with pool noodles and plastic tubes. For tenants in four buildings, air conditioning machines broke and would go unfixed for months, making conditions unbearable for tenants over the summer. Given that the construction work is illegal, tenants are not notified of construction and workers do not follow proper safety standards. Unsafe construction work included spray painting the exterior without notifying tenants, which would cause chemicals to enter the unit and affect air quality.

1949 Park Grove Ave.

Case Closure Timeframes

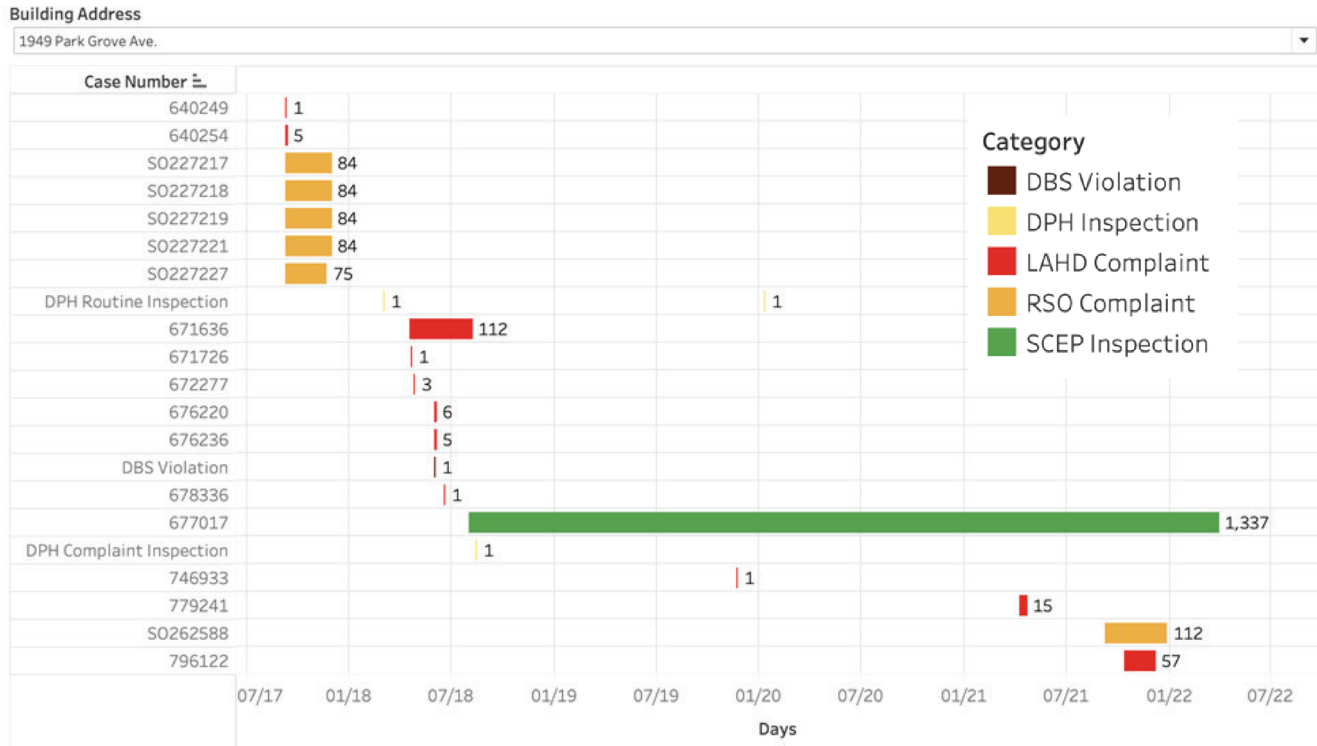


Figure 7. Timeline of Complaints and Inspections at 1949 Park Grove Ave.
Note: Numbers next to each event bar indicate the length of time it took to close the case.

1949 Park Grove Ave. is a nine-unit building in University Park that was purchased on July 24, 2017 by 1949 Park Grove Avenue LLC. On September 1, 2017, Victoria Vu issued tenants a Voluntary Move Out & Release Agreement. A tenant who was a resident of the building for 40 years accepted the offer and moved out. That unit, intended for student housing, remains empty as of 2021. At the same time, Vu sent a notice to tenants stating that starting September 1, 2017, seismic retrofitting would take place in the building. On September 6, 2017, a tenant received a verbal eviction notice to leave within 30 days.³⁴ Tenants soon filed multiple RSO complaints for illegal eviction, illegal buyout agreements, and non-payment of relocation assistance fees.³⁵ As a result of these complaints, Vu was informed to contact the Tenant Habitability Plan (THP) Section to determine if a THP plan is required to be filed with LAHD to earthquake retrofit the property. On September 7, 2017, tenants submitted two complaints to LAHD for construction without permits, construction work

³⁴ RSO Complaint #SO227221 was filed on September 7, 2017 for illegal eviction.

³⁵ RSO complaint #SO227218, SO227219, SO227221, SO227227, and SO227217 were submitted on September 7, 2017. For four cases, the landlord was informed that they needed to contact the Tenant Habitability Plan section to determine if a THP is necessary. In three cases (SO227218, SO227227, and SO227217) tenants informed LAHD that the landlord had given them verbal evictions and that the tenant did not agree to enter a buyout agreement.

impacting tenant habitability, building and/or premises were unsafe or unclean due to trash, debris, and/or discarded items stored on premises, stop work due to unsafe LEAD practices, lack of required amount of light and ventilation, leaking or defective plumbing faucet or fixture, plaster/drywall wall/ceiling covering defective, deteriorated, or paint is peeling, and to provide THP to the Los Angeles Housing Department for any/all work impacting the tenants' habitability.³⁶

These RSO and code violations were just the beginning of problems for tenants at 1949 Park Grove Ave. who would go on to live through four and a half years of habitability issues due to illegal and poorly done renovations and landlord negligence. After VF Developments removed all former tenants and renovated the property, new tenants experienced and continue to experience issues due to these renovations, issues that LAHD has extensive record of.

SCEP Inspection and REAP

A year after Vu purchased the property, LAHD conducted a SCEP inspection. On July 5, 2018 Housing Inspector Sara Vega showed up for an initial SCEP inspection, met with two out of nine tenants, with no owner or manager present, and was unable to enter the building to conduct an inspection.³⁷ Tenants stated they were not notified of the inspection by the owner. Inspector Hector Alikhan returned for another initial inspection on August 2, 2018 and neither the owner nor owner representatives were present to grant access. Despite not being able to inspect three units, the inspector noted 54 violations including 14 smoke detector violations, unapproved electric, heating, and plumbing work, windows changed out without LADBS approvals, permits, and inspection, and commencement of work without required approvals related to historic preservation requirements. Five reinspections occurred from September 2018 to July 2019 and LAHD inspectors spoke to Peter Lee, Kim Vu, Victoria Vu, and their contractor Ryan Eberle about code requirements and their failures to comply throughout this time.³⁸ During this time, the property owner had not obtained final LADBS inspections nor all of the required permits.

On February 1, 2019, six months after the initial SCEP inspection, this case was referred to the Enforcement Section as owners were “given substantial time to comply and address the violations.”³⁹ As a result, a General Manager’s hearing was held on July 30, 2019, a year after the initial SCEP inspection, and a decision was

³⁶ Complaint case #640249 and #640254. Both cases were closed within a week without a site visit.

³⁷ Case #677017

³⁸ Reinspections for case #677017 were held on September 13, 2018, November 15, 2018, January 16, 2019, June 25, 2019, and July 24, 2019.

³⁹ LAHD mailed a list of the violations to the owner on September 17, 2018.

delayed until September 3 after 1949 Park Grove Avenue LLC requested a 45 day extension. On October 9, 2019, the building was placed into REAP and the case was referred to the City Attorney. After the building went into REAP, Kim Vu and Sang Pham requested compliance reinspections to remove the property from REAP. At each inspection, inspectors noted that the property was still not in compliance.⁴⁰ Despite the building being put into REAP, tenants continued to have problems related to past illegal renovations and property negligence.

Property Negligence and Ignored Requests for Repair and Maintenance

When CCED volunteers conducted outreach at the building in April 2021, they spoke to a tenant who had been a resident of the building since 2018. He was the first resident to live there after VF Developments conducted renovations. The tenant shared that Vu hired contractors to repair the plumbing and holes, which were caused by VF Development's renovation efforts and deemed code violations by LAHD. However, the repair work was never completed. As a result, numerous gaping holes on the walls and ceilings were left in a state of disrepair.

To address SCEP violations, the property owner had to remove all unapproved washer/dryer units that were installed without permits. On July 30, 2019, Peter Lee, a representative from VF Developments, sent written notice to tenants regarding "Temporary Removal of Washer and Dryers," notifying them that the process would be completed in 30 days. In the meantime, tenants were promised temporary laundry facilities free of charge and a \$150 monthly credit towards rent due to the lack of in-unit laundry as stated in the lease agreement. After a few months, management stopped applying the credit without prior notice, and only provided one washer and one dryer for the whole apartment complex, in violation of lease agreements. The tenants shared that the dryer was out of service for two months during the summer of 2021 and wasn't fixed until September. As of October 2021, the shared washer and dryer were replaced with coin-operated units and VF Developments was still denying tenants the promised laundry credits.



Holes in wall of unit at 1949 Park Grove Avenue (Source: Email from tenant to LAHD RSO department)

Although VF Developments instructed tenants to report any issues to management via AppFolio, a prop-

⁴⁰ Re-inspections for case #677017 were held on November 20, 2019 and April 15, 2021.

erty management software, the tenants shared that their **repair requests were deleted without being addressed**. These requests included fixing the previously mentioned holes in the walls as well as an oven. As seen from the email correspondence with LAHD and images above, removal of the washer/dryer unit left holes and open walls in the bedrooms and bathroom from November 8, 2019 until December 2021. When the tenant made another request to repair the oven, they were ignored for three weeks and left with no other option than to purchase a gas range/oven igniter replacement and fix the oven themselves. When they requested credit for purchasing the parts out of their own pockets, VF Developments denied their request.

VF Development's Renovations Destroyed Historic Preservation Requirements and Tenant Safety

1949 Park Grove Ave. is located in the neighborhood of University Park and is within a Historic Preservation Overlay Zone (HPOZ). According to the Los Angeles City Planning website, “designating a neighborhood as a local historic district—also called a Historic Preservation Overlay Zone (HPOZ)—means that any new projects in that neighborhood must complement its historic character.”⁴¹ Since VF Developments has a history of disregarding the necessary permits for construction, they also received five complaints at two buildings (1949 Park Grove Ave. and 2814 Sichel St.) for construction that was performed without the required Certificate of Appropriateness for HPOZ. After renovations, 1949 Park Grove Ave. was ultimately transformed into a modern building with dark wood panels and lime green doors. CCED volunteers spoke to a neighbor of the



1949 Park Grove Ave. post renovations include dark wood panels and lime green doors that do not complement University Park's historic character. (Source: CCED Volunteer Outreach 4/4/21)

1949 Park Grove Ave.

Front gate of the building has holes large enough to allow USPS, UPS, Amazon, etc., and intruders to trespass into premises (Source: CCED Volunteer Outreach 4/4/2021)



building and she stated that the renovated building does not complement University Park's historic character. During the General Manager's hearing on September 3, 2019, a neighbor also showed up to express concerns about the building's violations to historic preservation.

After renovations, 1949 Park Grove Avenue LLC failed to provide basic safety to its tenants. Although the front gate of the building is locked, CCED volunteers were able to reach through the gate's large holes and access the gate's door knob while conducting outreach to the current tenants. When CCED volunteers brought this up to tenants, one stated that delivery persons would unlock the front gate all the time to deliver packages to the tenants' doorsteps. The tenant also shared that because of this issue, he witnessed a homeless man walking down the hallway area in front of his unit stealing packages and rummaging through the trash, and shared concerns for his own safety. The gate to the parking area behind the unit has been out of service since September 2021. There have also been reports of trespassers roaming around the premises at night stealing bikes and tenants are afraid their car batteries may be subject to theft. One tenant has shared that his bike was stolen but the building owners were unable to provide camera footage of the incident.

VF Developments has continuously displayed slumlord tactics at 1949 Park Grove Ave. since they purchased the building in 2017. Throughout the past three years, they have continued to destroy safe and habitable housing for their tenants through illegal eviction attempts, performing construction without permits, subpar renovations, ignoring maintenance requests, as well as failure to uphold parts of the lease agreements they provided to their tenants.

Although the property has been under REAP since November 2019, VF Developments have yet to accept full responsibility for their actions or resolve these code violations, which still leaves tenants today at 1949 Park Grove Ave. without their promised in-unit washers/dryers and repairs to their parking garage gate. The holes in tenants' walls and ceilings were finally resolved in December 2021 after tenants filed reports to the city. The case of 1949 Park Grove Ave. exemplifies ongoing egregious issues and how VF Developments willfully neglect to provide safe and livable housing conditions for their tenants. Furthermore, despite LAHD's



Keyless door lock is faulty and does not work. (Source: CCED Volunteer Outreach 4/4/21)

attempts to hold Vu and her staff accountable, even putting the building into REAP did little to improve the tenant's housing quality or safety. The City Attorney, despite being forwarded this case, has not investigated or filed any misdemeanor charges for Vu's crimes here.

Violations Noted from SCEP Inspections

LAHD inspectors also noted similar issues when conducting SCEP inspections. While LAHD aims to inspect buildings every four years, only 62.5% of buildings (20 of 32) owned by Vu/Fink have been inspected since 2018. Of the 32 buildings in this report, LAHD has conducted SCEP inspections for only 15 of these buildings since Vu/Fink purchased the property. Five of these buildings did not have full inspections because the inspector could not access multiple units and one was vacant so it was not inspected. From these 15 inspections, three were referred to a General Manager's hearing, two went into REAP, and another was referred to the enforcement section. Table 5 describes the number of violations noted during SCEP inspections for each of the 15 buildings inspected. (Note: Two buildings inspected are not included in the table because one had no violations (955 N. Oxford Ave.) and one was not inspected due to being completely vacant (900 W. College St.)). For buildings that are not inspected due to being under remodel, LAHD does not conduct follow up inspections to evaluate the quality of remodeling or construction without permits. This causes further potential harm to future tenants as issues related to poor construction or construction without permits or inspections can result in flooding, gas leaks, and electrical issues; for Vu/Fink buildings, unregulated and illegal construction created multiple habitability and safety issues, which we outline in later case studies.



Caption: Hole in the wall inside a tenant's bedroom that has been left unrepaired (Source: Tenant at 1949 Park Grove 09/07/21)

Number of violations by category for each SCEP inspection

| Address | Date of inspection | Maintenance | Electrical | Plumbing | Heating and ventilation | Illegal Construction | Fire safety | Other | Total |
|-------------------------------------|--------------------|-------------|------------|----------|-------------------------|----------------------|-------------|-------|-------|
| 215 N. Fickett St. | 9/19/2017 | 11 | 0 | 7 | 1 | 2 | 7 | 3 | 31 |
| 2730 Raymond Ave. [^] | 10/23/2017 | 5 | 1 | 2 | 4 | 0 | 9 | 9 | 30 |
| 249 S. Coronado St. ^{**} | 12/21/2017 | 1 | 8 | 1 | 8 | 1 | 5 | 0 | 24 |
| 1949 Park Grove Ave. ^{*^} | 8/1/2018 | 5 | 8 | 10 | 12 | 0 | 15 | 4 | 54 |
| 6307 Elgin St. [*] | 2/11/2019 | 16 | 0 | 6 | 2 | 0 | 0 | 6 | 30 |
| 141 San Pascual Avenue [*] | 2/15/2019 | 2 | 5 | 4 | 6 | 0 | 19 | 0 | 36 |
| 1358 W. 36th St. [^] | 8/12/2019 | 17 | 5 | 8 | 2 | 1 | 13 | 11 | 57 |
| 1321 W. 36th Pl | 8/15/2019 | 1 | 3 | 5 | 8 | 0 | 0 | 0 | 17 |
| 1333 W. 36th Pl. | 8/19/2019 | 10 | 4 | 4 | 6 | 0 | 9 | 0 | 33 |
| 1139 W Bellevue Ave [^] | 11/13/2019 | 0 | 0 | 0 | 0 | 0 | 5 | 1 | 6 |
| 1352 W. 36th St. | 11/20/2019 | 5 | 16 | 5 | 2 | 0 | 18 | 6 | 52 |
| 920 Everett | 8/23/2021 | 2 | 3 | 9 | 1 | 0 | 5 | 2 | 22 |
| 3535 Ellsworth [^] | 10/18/2021 | 6 | 6 | 4 | 0 | 7 | 5 | 5 | 33 |

Note: The number of violations for 1358 W. 36th St. is for the initial inspection and additional violations noted at re-inspections.

^{*}General Manager Hearing for SCEP inspection

^{**}Referred to Enforcement Agency

[^]Multiple units not inspected

Table 5. Number of violations by category for each SCEP inspection

In 13 inspections that found violations, LAHD cited 425 total violations with an average of 33 violations per building. The most violations were cited for 1358 W. 36th St. (57 violations), 1949 Park Grove Ave. (54 violations), and 1352 W. 36th St. (52 violations). Fire safety (110 violations), maintenance (81 violations), and plumbing (65 violations) were the biggest issues across buildings although inspectors also cited numerous electrical and heating and ventilation violations. Of these 15 inspections, five are still open and two buildings are currently in REAP. Of the closed cases, six took longer than 120 days to close with two taking over 500 days to close (249 S. Coronado St.,⁴² 1358 W. 36th St.).⁴³ Although both of these buildings' inspections were partially delayed due to COVID-19, they were also delayed due to high staff turnover at VF Developments that delayed reinspections and LAHD providing the landlord numerous reinspections to resolve issues.

In the case of 1358 W. 36th St., LAHD conducted seven SCEP reinspections over the course of two years.⁴⁴ At the first two inspections, no property representative was present and VF Developments claimed they never received a Notice to Comply. Throughout these inspections, LAHD spoke to four separate property managers and continuously had trouble contacting the owner when the property manager no longer worked at VF De-

⁴² The initial SCEP inspection at 249 S. Coronado St. (Case #736756) took place on October 25, 2019. Sang Pham, the property manager, was present at the initial inspection. SCEP reinspections were held on January 22, 2020 and October 15, 2020. At the reinspection on October 15, Anthony Garcia, who works directly with the property owner, noted that none of the work had been done and the management company had been let go. Inspectors began speaking with the new manager, Kim Vu on January 11, 2021, who sent photos to inspectors that showed corrections were done in poor workmanship. The reinspection on March 24, 2021 found that all violations had been corrected and unit 6 was vacant. The case was closed on March 24, 2021.

⁴³ The initial SCEP inspection at 1358 W. 36th St. (Case #725718) took place on August 12, 2019. Two units were not inspected at this time.

⁴⁴ SCEP reinspections for Case #725718 were held on November 20, 2019, December 31, 2019, March 3, 2020, August 11, 2020, September 23, 2020, November 12, 2020, and March 12, 2021.



Unfinished construction throughout 1949 Park Grove. Right: Hole left from construction by a unit's front door. Left: Holes left from plumbing on the ceiling of parking garage area. (Source: CCED Volunteer Outreach 04/04/21)

velopments. This is despite making initial contact with Victoria Vu, who claimed to be the owner in 2019. Her mother, Kim Vu, also claimed to be the owner at a later SCEP reinspection.⁴⁵ Despite this constant delay, continuous violations, and little evidence that attempts were made to address violations, LAHD granted multiple 30-day extensions. As a result, tenants had to live in the building for a year and a half with violations. While the initial SCEP inspection was on August 12, 2019, as of March 3, 2020, violations remained including:

- Holes around pipes
- Plaster/drywall deteriorating and defective
- Foundation vents uncovered
- Damaged tubs
- Non-functioning heater
- Rough patching, chipping, and peeling paint on exterior walls

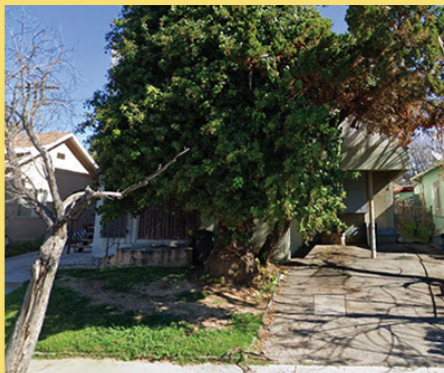
After SCEP inspections began again, inspectors cited 13 additional violations at the reinspection on August 11, 2020 including illegal construction. A SCEP reinspection with a new property manager occurred on September 23, 2020 and then another SCEP reinspection occurred with no owner or property manager present on November 12, 2020. The case was eventually closed on March 24, 2021, 578 days after the initial inspection. Throughout this process, corrections were delayed due to constant staff turnover and LAHD giving the property owner extensions when no one showed up at the SCEP reinspection, further incentivizing non-compliance and unresponsiveness and putting the burden on tenants to skip work to be present at inspections. Furthermore, while ignoring the notices to comply, Vu and her staff were actively doing illegal construction on the property, which LAHD noted and still gave Vu multiple extensions to correct the violations.

⁴⁵ Kim Vu was present at SCEP reinspection for Case #725718 on March 12, 2021.

The Highest Form of LAHD Accountability: General Manager's Hearings, REAP, and the City Attorney

Even when LAHD uses its highest levels of accountability, this has done little to improve tenant conditions. As noted in Table 1, 12 buildings have had a total of 13 General Manager's hearings due to Vu and her staff's failures to correct violations in a timely manner. Of these, three were triggered by a SCEP inspection, nine were due to complaints, and one was for failing to submit a Tenant Habitability Plan. Since Vu and Fink purchased the properties, five buildings have been put into REAP; three buildings are currently in REAP. Two buildings (627 Britannia St. and 2814 Sichel St.) were recently placed into REAP in 2021, indicating that poor mismanagement persists. Since three REAP buildings (627 Britannia St., 1949 Park Grove Ave., and 1486 Silver Lake Blvd.) are discussed in further detail in the case studies, we focus on two other REAP cases here (6307 Elgin St. and 2814 Sichel St.) to highlight the expansiveness of Vu and Fink's property mismanagement.

6307 Elgin St.



6307 Elgin Street taken in 2007 and 2019 (Source: Google Maps)

6307 Elgin St. was put into REAP due to a SCEP inspection that took place on March 28, 2019.⁴⁶ The inspector cited 33 violations including: exposed wood/peeling paint on window sills and walls, damaged wood fence, damaged floor covering, chipped sinks and bathtubs, exposed ceiling, hole in wall, missing vent hood, damaged/cracked windows, inoperative, missing thermostat cover, unapproved corrugated/accordion style drain pipes. When the inspector visited the property again on May 21, 2019, he noted that all 33 violations were unresolved and forwarded the case to a General Manager's hearing scheduled for October 28, 2019. At the same time, tenants submitted a complaint to LAHD about overflowing garbage bins, overgrown trees, trash and debris throughout the property, and the open storage of wrought iron security gates and bars on the property.⁴⁷

⁴⁶ Case #702580

⁴⁷ Complaint #724384 was submitted on May 17, 2019 for "trash, debris, and/or discard items stored on premises, Lack of adequate number of receptacles for garbage and rubbish." An inspection on May 17 found a garbage bin overflowing, an overgrown tree at front

Rather than address housing conditions, garbage, and safety violations, Vu and her team were busy evicting tenants and convincing others to leave. At the General Manager's hearing, Linda Hollenbeck, Vu's attorney said that violations were not corrected because tenants were currently in the process of moving out of the property or were being evicted. By delaying maintenance and refusing to address any violations, Vu and her team were able to evade accountability while making living conditions unbearable for tenants that were still there. When inspectors visited the building in November, the property was 100% vacant, boarded, and fenced and the case was suspended because it was no longer in LAHD's jurisdiction. Although the General Manager ruled to refer violations to the City Attorney's office for potential misdemeanor charges, there is no public information about what happened with this case. As of 2022, new tenants have moved into the building and LAHD has not conducted any inspections after the remodeling occurred. New tenants have noted similar problems as previous tenants including garbage piling up and overflowing because it does not get picked up regularly. Tenants also noted issues with the remodeling including doorbells and security cameras not working, cracks in ceiling causing leaks, broken air condition, and electricity that goes in and out.⁴⁸

2814 Sichel St

2814 Sichel Street

*taken in April 2019 and
January 2021 (Source:
Google Maps)*



A neighbor filed a complaint to LAHD on June 23, 2020⁴⁹ alleging construction performed without the required Certificate of Appropriateness for Historic Preservation Overlay Zone (HPOZ) and the presence of an over height fence. When inspectors visited the building, they noted exterior construction without permits and cited four violations:

- Provide finalized approvals from LADBS for all windows changed out on entire building
- Provide finalized approvals from LADBS for unapproved electrical
- Provide finalized approvals from LADBS for installation of air condition units
- Provide finalized approvals from LADBS for construction of wood fence

yard touching roof line, dead vegetation, trash and debris throughout the property, open storage of wrought iron security gates and bars on the property.

⁴⁸ Tenants expressed these issues to CCED volunteers during outreach

⁴⁹ Case #764454

When inspectors visited the building for a reinspection on September 29, 2020, a male representative of the owner said that they were attempting to get permits from LADBS. However, in October 2020, inspectors noted that permits had not been applied for and in December 2020, permits had still not been issued. A submitted Tenant Habitability Plan in October was rejected because it was missing the required permits and work schedule. Even after inspectors talked to Kim Vu⁵⁰ directly and explained the General Manager's hearing and REAP process to her and emailed her the notice to comply, Vu and her staff continued to conduct construction without necessary permits. Fifteen months after the complaint was filed, a General Manager's hearing was held on September 27, 2021, with no ownership present and all violations still unresolved. For tenants living in the building, issues have persisted including flooding in the building and holes and exposed pipes on the exterior of the building. Even though LAHD recommended that the case be referred to the City Attorney, no further enforcement has happened on this building.

From our review of LAHD and DPH complaints, inspections, and violations, we identified a pattern of illegal construction and safety issues related to construction, flooding and water damage, and sanitation issues impacting tenant safety and habitability. These issues are further corroborated through conversations with tenants. While there are sure to be even more violations that have gone unreported, the city has a record of hundreds of complaints and issues brought up from tenants and neighbors and witnessed by inspectors in both the complaint and SCEP departments. Despite 13 General Manager's hearings and 5 REAP cases, LAHD has not conducted a thorough investigation into Vu and Fink's patterns of general mismanagement and lack of accountability. Furthermore, the City Attorney has been notified of at least four Vu/Fink cases and has done nothing to address Vu/Fink's prevalence for egregious housing violations. Additionally, we identified multiple complaint and SCEP cases where Vu and her staff willfully ignored or delayed compliance while actively trying to remove tenants through cash for keys or evictions and conduct illegal construction. An investigation into Vu and Fink's business practices needs to investigate both the extent of their housing violations and the ways they reduce housing quality as a means of tenant harassment. However, further regulation and code enforcement must prioritize tenants' ability to safely and affordably stay in their homes.

⁵⁰ Contact was first made with Kim Vu regarding case #764454 on December 17, 2020. Kim Vu was also informed of enforcement and General Manager review on December 24, 2020.

Destruction of Housing Stock

LLC landlord strategies to remove affordable units from the market and redevelop them using unsafe and unpermitted construction are a threat to the city's housing stock. As highlighted in City of Los Angeles' 2021-2029 housing element, new construction of affordable housing for low income residents will fall far below targets set by the Regional Housing Needs Assessment (RHNA).⁵¹ However, construction for above moderate income units (247,000) will exceed RHNA goals (196,831 units). As the city has noted, the preservation of existing affordable housing is extremely important to maintain the housing stock in Los Angeles because local and state funding for affordable housing is limited⁵² and the city is not building new affordable units quickly enough to address the housing crisis. Meanwhile, LLC landlords like Victoria Vu and Jerome Fink actively destroy the quality and availability of affordable housing. This section outlines their usage of illegal construction, the city's lack of effective enforcement, and the effects of unpermitted construction on displacing RSO residents, reducing housing quality for other tenants, and reducing the number of livable units in the city.

The Vu/Fink business model relies on reducing costs by ignoring required permits, avoiding code enforcement, and regularly changing out contractors. Illegal and unpermitted construction serves to 1) harass long-time tenants and reduce their quality of housing and 2) hastily redevelop properties to rent to new tenants at higher rent prices. In cases where LAHD inspectors did note violations for illegal construction, cases were often closed after Vu and her staff pulled permits retroactively. Thus, any construction work that applied to those permits were already completed without inspections when the permit was granted. When inspectors tried to enforce violations for construction without permits, Vu's staff continued to conduct construction with limited accountability or oversight. Even when permits are pulled, inspectors noted that "permits do not reflect actual work being performed."⁵³ This construction work affected tenants' safety and ability to live peacefully in their homes. For units with new amenities implemented through illegal construction, new tenants quickly began to experience decreased housing quality.

VF Developments and their contractors have a history of conducting unsafe construction, without permits or the necessary inspections. LAHD recorded 49 individual complaint cases detailing 74 issues with illegal construction across 14 buildings. Out of these complaints, 16 were made regarding unsafe LEAD practices, and 25 were about construction work impacting tenant habitability. This may be an underestimation of the total number of times VF Developments has performed construction without permits due to 1) tenant's fears or lack of information on how to file a complaint and 2) construction completed without permits on vacant

⁵¹ 2021-2029 Housing Element Chapter 1: Housing Needs Assessment

⁵² City of Los Angeles, Consolidated Annual Performance & Evaluation Report, PY 46, 2020-2021

⁵³ Inspector note on August 23, 2018 for 1486 Silver Lake Blvd. for Case #687598.

apartment buildings. Jerome Fink also received eight certificates of substandard property and five notices of construction in progress or completed without permits or inspections by LADBS for ten buildings. Four LADBS violations were referred to the Housing Department (LAHD).

Regarding complaints about illegal construction, 26 were closed without a site visit. Five cases took between 50-70 days to close and seven took over 100 days to close, with the longest case taking 549 days⁵⁴ (from the time the complaint was made to the time violations were resolved and the building was taken out of REAP). Additionally, two buildings were referred to enforcement and the City Attorney for illegal construction (twice at 627 Britannia St., once at 2814 Sichel St.). Tenants also detailed how construction workers left trash and debris on the premises, vacant units unsecure, and caused heating, plumbing, lighting, and electrical problems. These violations are not simply due to properties deteriorating over time or the negligence of previous owners but are a result of active work done by Vu and her staff.

We provide case studies of three buildings to highlight illegal construction conducted to reduce the quality of housing for RSO tenants and the effect of this poor construction on habitability for new tenants. At 215 N. Fickett St., inspectors immediately noted violations for illegal construction performed without permits and RSO complaints a month after Vu/Fink bought the building. Within a year, new tenants moved into the building and experienced similar issues of unsafe and unsanitary construction without permits. At 2422 Meadowvale Ave., LAHD noted complaints for construction in progress without permits and RSO complaints regarding illegal evictions. Within a year, new tenants experienced damage to their unit from unpermitted construction including non-functioning electrical outlets, water leaks, and non-functioning water lines. 1486 Silver Lake Blvd. is an example of how never-ending construction is used as a tool of tenant harassment alongside RSO violations and attempts to use the Ellis Act to convince tenants to take buyout offers. Furthermore, the building serves as an example of VF Development's practice of pulling incorrect permits to bypass required inspections and Tenant Habitability Plans and LAHD's tendency to close cases without a site visit and discounting tenant's experiences.

⁵⁴ Case #687786 for 1486 Silver Lake Blvd.

215 N. Fickett St.

Case Closure Timeframes

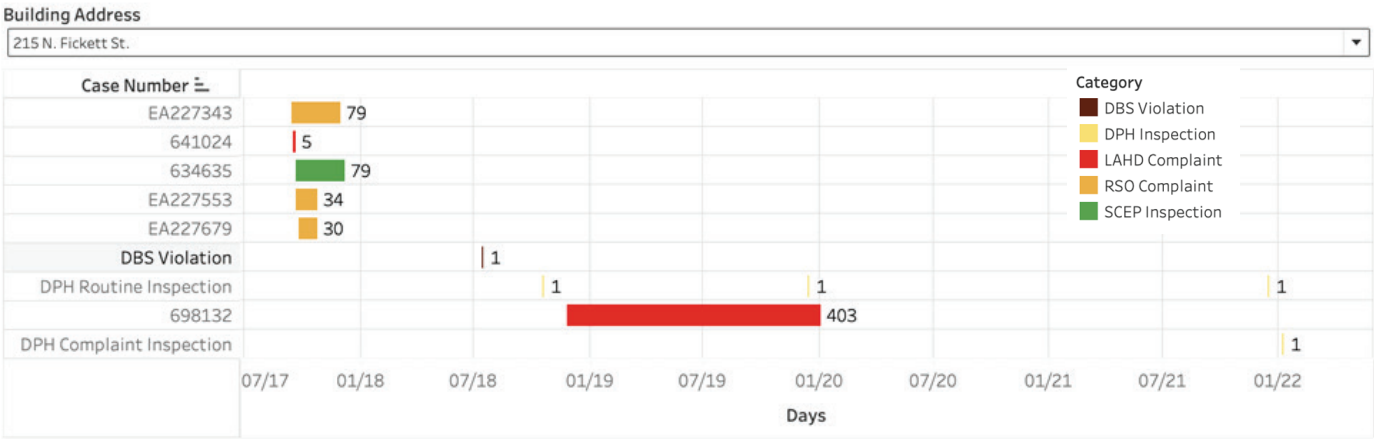


Figure 8. Timeline of Complaints and Inspections at 215 N. Fickett St.
Note: Numbers next to each event bar indicate the length of time it took to close the case.

215
N .

Fickett St. is a six-unit building in Boyle Heights that was bought on August 25, 2017 by 215 N Fickett Street LLC. On September 19, 2017, inspectors conducted a SCEP inspection⁵⁵ and noted compounding violations that included illegal construction performed without permits, broken smoke detectors in all units, defective venting systems, defective floor coverings, insect screening, loose fixtures, and damaged plumbing. While LAHD granted Victoria Vu an extension to address these violations until December, Vu was actively working to remove tenants from the building who were protected under RSO and had lived in the building since 2002. In September 2017, three RSO complaints were made in the building for reduction of services (gas being shut off), illegal buyout agreements, and failure to post RSO notice.⁵⁶ At the time of reinspection on December 20, 2017, inspectors noted that five out of the six units were vacant and no repairs had been made. The case closed on January 2, 2018, with inspectors stating that all violations were corrected.

Less than a year later, new tenants began making complaints of construction in progress without permits, unsafe stairways and guardrails, trash and debris, plumbing issues, electrical issues, etc. These complaints began because the plumbing and construction conducted without permits flooded a new tenant's unit.⁵⁷ On December 13, 2018, an inspection noted construction without permits, fall hazard on the second floor stairwell, unapproved electric work, unapproved heating work, unapproved plumbing work in all six units and water damage in the walls and ceiling for unit 6. Within eleven months, all previous tenants had vacated

⁵⁵ Case #634635
⁵⁶ RSO complaint #EA227343 was made on September 12, 2017 for reduction of services, #EA227553 was made on September 19, 2017 for illegal buyout agreement, and #EA227678 was made on September 23, 2017 for failure to post RSO notice and illegal buyout agreement.
⁵⁷ Complaint #698132 was initially made on November 26, 2018.

the building, VF developments and its contractors conducted electrical, heating, plumbing, and construction work without permits or necessary inspections, and rented the units to new tenants who began to experience plumbing, electrical, and other safety issues as a result of poor construction. Inspection photos also indicate that VF staff and contractors had been leaving debris outside of the building and that construction conducted created unsafe and unsanitary conditions for tenants.



Caption: Storage of construction materials on property (Source: LAHD inspection on 12/13/2018)

Even after multiple follow-ups and reinspections, Vu failed to correct the violations, stop construction, or pull the necessary permits. It took a General Manager's hearing on September 30, 2019 for the property owner to respond to the unsafe construction and living conditions of the building. Sang Pham, the owner's manager, attended the hearing and finally showed evidence that they were trying to obtain the necessary permits and approvals for 26 window change-out, 400 amp electrical service, replacing 42 breakers, water heater change out, and HVAC approvals, all retroactively as this illegal construction had already been done without inspections or oversight. On January 6, 2020, the case manager closed the case and verified compliance, over a year after the initial complaint. During that time, tenants lived with trash and debris on their lawn, water damage, unsafe stairs, and a landlord who refused to respond to maintenance requests. When CCED volunteers conducted outreach to Vu/Fink tenants in 2021, tenants noted issues with the building gate, lights being broken, and maintenance requests taking an exceptionally long time to fix.

2422 Meadowvale Ave.

Case Closure Timeframes

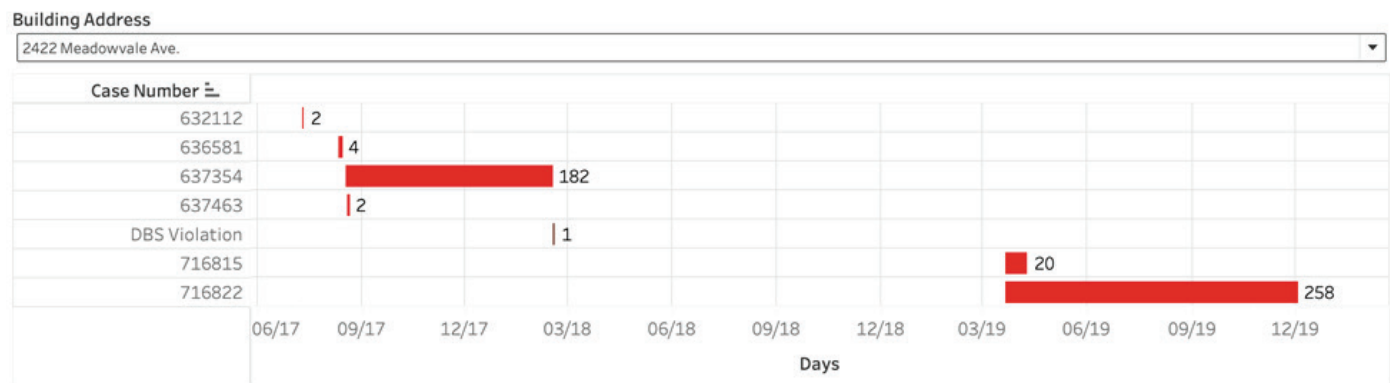


Figure 9. Timeline of Complaints and Inspections at 2422 Meadowvale Ave.
Note: Numbers next to each event bar indicate the length of time it took to close the case.

Jerome Fink bought 2422 Meadowvale Ave., a three unit building in Elysian Valley on June 9, 2017. A month into owning the property, LAHD began to receive RSO complaints about illegal evictions and attempts to use cash for keys to remove long standing tenants.⁵⁸ Two months after Fink bought the property, LAHD received complaints of construction in progress without permits and sent multiple stop work orders.⁵⁹ Permits were finally pulled for the building in December 2017. Within a year, all original tenants had moved out of the building, construction was completed without further inspections, and new tenants moved into the building in July 2018.

Beginning in March 2019, new tenants began to notice damage in their unit as a result of the prior construction, plumbing, and electrical work conducted without permits. Complaints included:⁶⁰

- A water leak that caused fungus to grow out of the ceiling
- Broken windows that cannot close or lock
- Water damage to window frames and sills
- Termite damage
- Water damage around bathroom vents
- Electrical outlets in the bedroom and kitchen not working
- Non functional smoke detectors

⁵⁸ Complaints case #EA225584 was filed on July 7, 2017 and #EA225610 was filed on July 10, 2017 both alleging illegal eviction. In both cases, the investigator notified the landlord of the proper buyout agreement process under RSO.

⁵⁹ Complaint #637463 was reported on August 19, 2017 about construction in progress without permits. The case was closed on August 21, 2017. Another complaint (#636581) was made on August 11, 2017 regarding building and/or premises being unsafe or unclean, unit in unsafe and/or unclean condition, insect, vermin, and/or rodent infestation

⁶⁰ Complaint #716822 was made on March 20, 2019.

- Bubbling/foaming water in bathroom drain when the laundry was in use
- An unresponsive landlord who refused to conduct maintenance



On left: New in unit washer dryer that were put in without permits or approvals (Source: LAHD inspection on 4/9/2019). On right: Smoke detectors were not hard wired (Source: LAHD inspection on 6/7/2019).

An inspection on April 9, 2019 noted that many of these issues were due to unapproved electrical and plumbing work, laundry connections and water heater replacements installed without permits, and improperly sealed windows that were replaced without permits. Unapproved plumbing work had caused water damage, leaking in the windows, issues with bathroom drains, and fungus. Smoke detectors were either missing entirely or were taped onto the ceiling without being hard wired. Amenities including in-unit washer/dryers that were used to charge higher rent prices to new tenants were improperly put in and would flood the apartment or affect the water in the bathrooms.

It took three reinspections⁶¹ and **two General Manager's hearings**⁶² for Vu and her property managers Tracey Keating and Sang Pham to address these violations. All of these violations were preventable. They were due to shoddy construction, electrical, and plumbing work done without permits or inspections, improper construction that LAHD was aware of when they sent two Stop Work Orders in 2017 and then seemingly closed the case. Despite pulling permits after the construction was completed, neither LADBS or LAHD conducted any inspections into a building they knew had improper construction prior and only responded when tenants

⁶¹ Reinspections were held on June 7, 2019, October 23, 2019, and December 3, 2019.

⁶² General Manager's hearings were held on October 9, 2019 and December 4, 2019 for Case #716822. Sang Pham represented the owner and requested extra time to obtain permits for smoke detectors but said that all other violations had been corrected. Tenants at the hearing noted that their window and bathroom had not been repaired despite Pham's claims. A follow up inspection on October 23, 2019 noted that the property was still not in compliance for multiple violations. The General Manager determined that these violations constituted a reduction in living services and habitability violations. A follow up General Manager's hearing was held on December 4, 2019 with Victoria Vu and property manager Tracey Keting present. At this time all violations were resolved and the case was closed.

complained of water damage and appliances not working.

In both of these buildings, construction without permits affected the safety and habitability for both old and new tenants. For old tenants, illegal construction occurred concurrently with illegal buyout offers, a reduction in services, and illegal eviction attempts. Tenants were experiencing construction in and near their homes as they were also being pressured to accept cash for keys offers. For new tenants, construction conducted without permits affected the quality and safety of their homes and management was unresponsive to maintenance requests. New tenants who were convinced to move into these new “renovated” buildings for greater amenities and higher rent prices soon experienced flooding, water damage, broken windows, and unsafe walkways and stairways.

In both instances, LAHD was made aware of construction without permits, allowed Vu and her staff months to correct these issues, and then had to conduct multiple inspections less than a year later as a result of the poor construction. Meanwhile, tenants had to live through trash and debris surrounding their homes, fear of mildew, flooding, and mold, and constant negligence from their property manager. It took until Vu was forced to attend General Manager’s hearings to correct these mistakes and make these homes safe and habitable for tenants, tenants who moved in for the alleged renovations and new amenities that VF Developments was marketing.

1486 Silver Lake Blvd.

Case Closure Timeframes

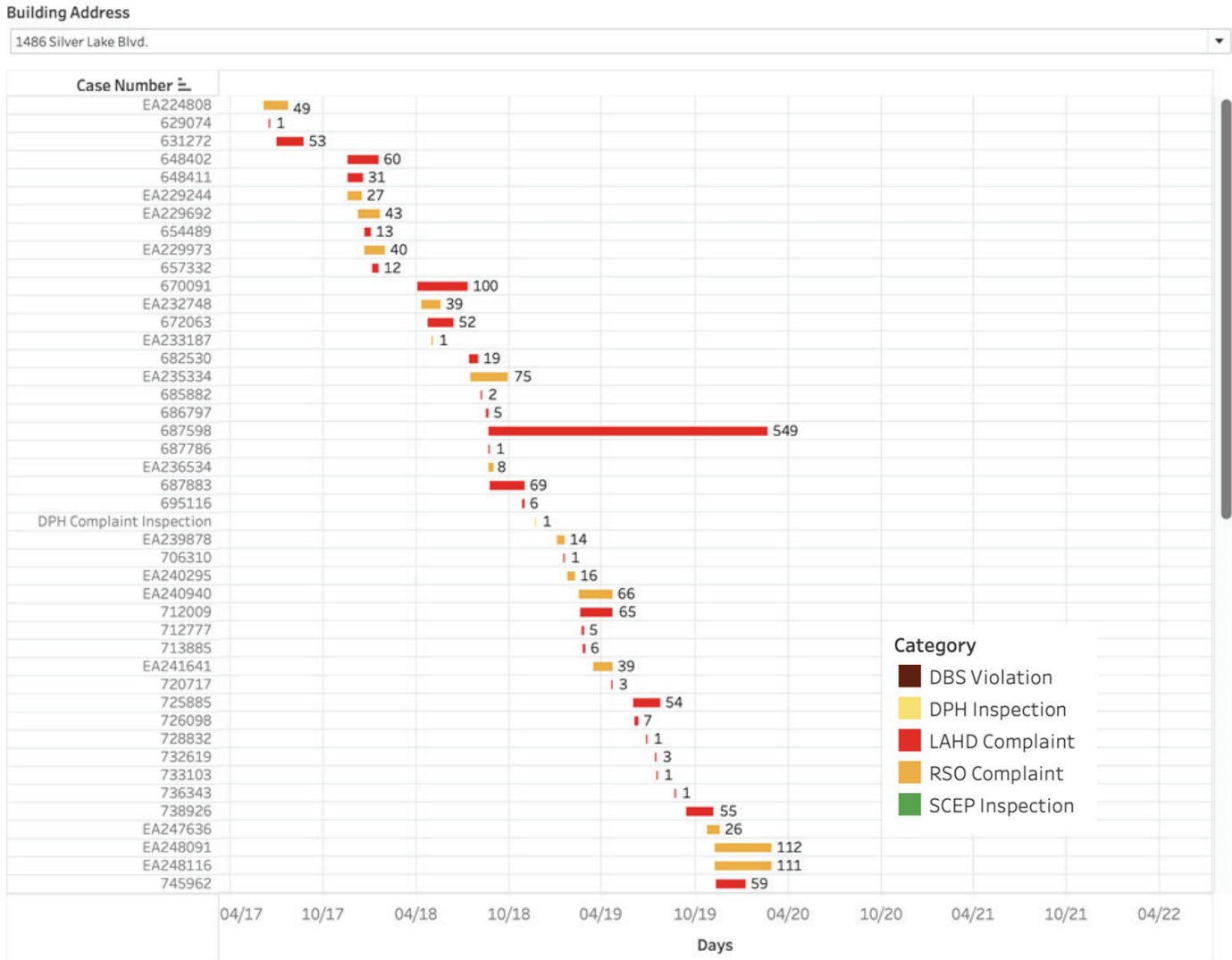


Figure 10. Timeline of Complaints and Inspections at 1486 Silver Lake Blvd., April 2017-November 2019

Case Closure Timeframes

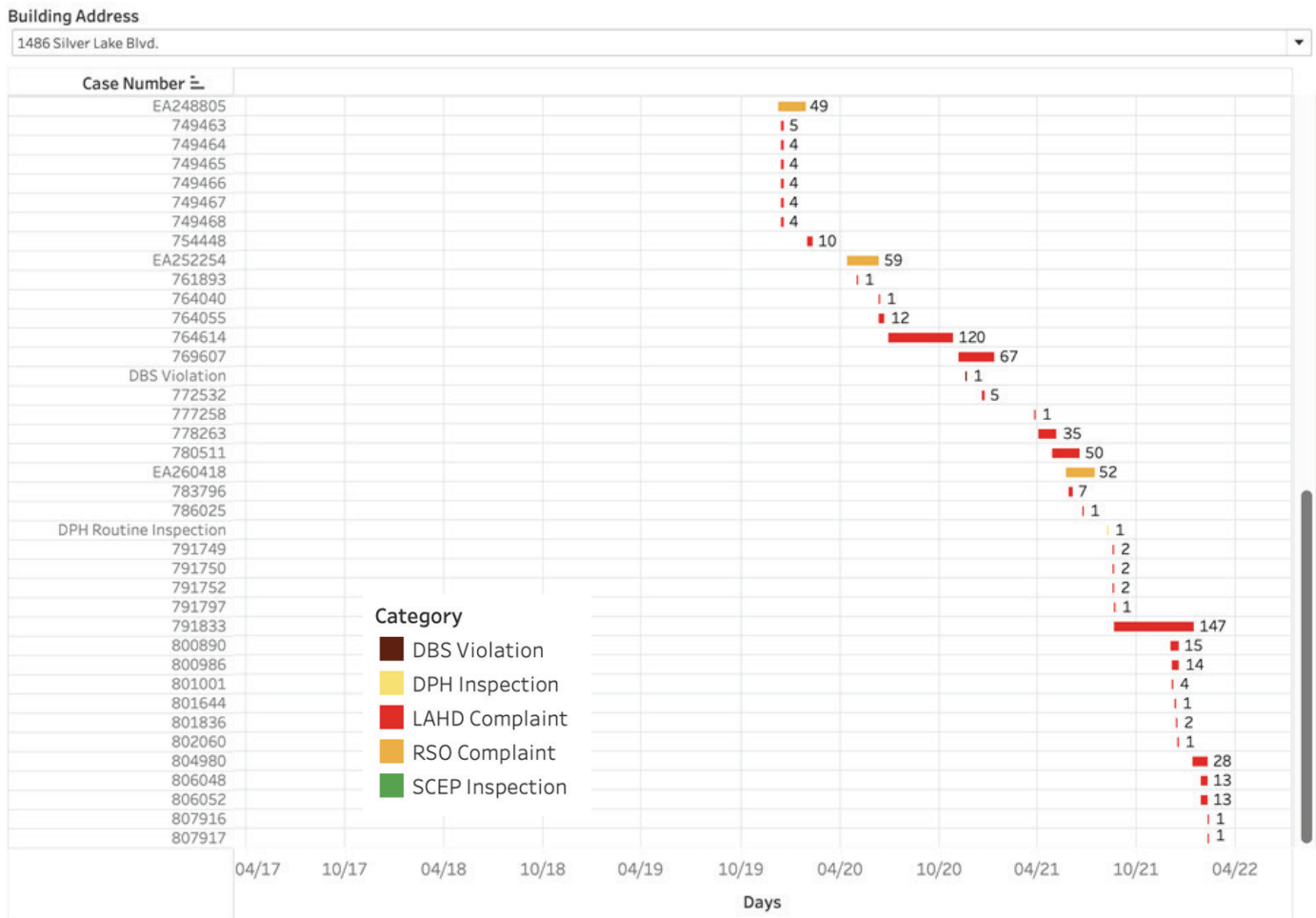


Figure 11. Timeline of Complaints and Inspections at 1486 Silver Lake Blvd., November 2019-Present

Note: Numbers next to each event bar indicate the length of time it took to close the case.

1486 Silver Lake Blvd. is a five unit property that was purchased by 1486 Silver Lake Boulevard LLC C/O Jerome A Fink on May 9, 2017. Before Jerome Fink purchased the property, there had only been one complaint at the building. Over the course of four and a half years, tenants at this building have reported 62 complaints to LAHD, mostly related to illegal construction. Construction in progress without permits was reported 17 times and construction work impacting tenant habitability was reported 17 times. Six stop work orders for unsafe LEAD practices have been issued over four years.⁶³ The city responded by ignoring tenant concerns and closing 32 complaints without a site visit. Despite being placed into REAP on November 21, 2019, the building was removed from the program only three months later and issues related to illegal construction and construction without the required Tenant Habitability Plan persist and continue to be reported to LAHD.

1486 Silver Lake Blvd. highlights Vu and Fink use of illegal strategies and LAHD's refusal to enforce city law

⁶³ Stop work orders for unsafe LEAD practices were issued in 2018, 2019, and 2021.

regarding safe construction and habitability through four key issues: never ending and illegal construction as a form of tenant harassment, LAHD removing the building from REAP although illegal construction and other issues continued, LAHD closing complaints without a site visit, and Vu and Fink utilizing RSO violations and invoking the Ellis Act to harass tenants to leave.

Endless Illegal Construction as Tenant Harassment

There are a myriad of issues surrounding how VF approaches the permitting process and performing construction. Vu and her staff have a tendency to either not pull permits, pull permits for single family homes instead of multifamily buildings to avoid the required Tenant Habitability Plan, or pull permits for partial work and conduct unpermitted work alongside work LADBS has approved. This allows Vu and her contractors to do cheap renovations without inspections. LAHD has received complaints every year from 2017 to 2021 that construction is being performed without permits,⁶⁴ and Vu and Fink have continuously been informed of the permit requirements. If they do pull permits, they are often not the correct ones or work is not performed to code.⁶⁵ During a complaint inspection for illegal construction on August 23, 2018, an inspector noted that “permits do not reflect actual work being performed.”⁶⁶⁶⁷



Photos were taken on August 19, 2021 for case #791833. The Housing Inspector, Michael Barela, noted Vu needed to obtain permits and final inspection from LADBS for demoing the wall and ceiling and general modeling

⁶⁴ On December 20, 2017, the first complaint was filed for construction without permit; the landlord/owner tried to erect a construction fence along the perimeter of the entire building. The workers stopped when confronted because they had no permits. According to an “Additional Evidence” form, on January 4, 2018, the fence was erected and blocked tenants living in the lower apartments in the event of a fire or emergency. This fence remained until August 24, 2018. On August 24, 2018, a notice and order to comply from LAHD described failure to obtain the required building permits and inspection approvals. On September 30, 2021, a violation was noted for illegal construction without required permits. Illegal construction included demoing the wall, ceiling coverings and framing, electrical and plumbing work.

⁶⁵ On October 15, 2018, permits were required for plumbing and construction work. Inspector notes by Jose Zepeda state that the work is not being performed to code. The plumbing work and water heater installation was done without permit or inspection approval.

⁶⁶ Inspection for Case #687598 noted that permits do not reflect work being performed include rewiring throughout unit, window framing to a smaller window, and framing of a new shower. Other plumbing and electrical work was not being performed to code.

⁶⁷ On December 17, 2020 (Case #772532) a tenant noted that trash bins “had been left overflowing on the property for the past 8 months, attracting rats and birds.”

Construction is often performed outside of allowed hours, work is left unfinished for months or even years, materials are strewn about the property and trash overflowed in bins without being removed.⁶⁸ A tenant also described how construction workers allowed open plumbing to flow into the driveway so tenants had to walk through debris and waste to get to their apartment. Neglecting to remove trash for eight months while tenants are living there is active negligence and both a health and sanitation issue. Piles of trash are a breeding ground for rats and other vermin, such as cockroaches.⁶⁹ Furthermore, services are often turned off during construction with minimal notice, and shoddy construction has caused leaks in bedrooms and bathrooms. In one instance, construction materials blocked the exit from apartment

doors and tenants were unable to leave.⁷⁰ 24-hour notices of major construction work for illegal construction were often sent to tenants, giving them little notice to contact LAHD regarding the illegal work. This harassment and poor construction work results in poor quality housing for current and future tenants.



Inspection for Case #769607 on November 18, 2020. Photo taken by Housing Inspector Thomas Reichmann show visible holes in the ceiling.

General Manager's Hearing's and REAP for Illegal Construction

General Manager's hearings were held for two cases at 1486 Silver Lake Blvd. Case #712009 did not result in the building being placed in REAP whereas case #687598 resulted in the building being placed in REAP for less than a year. Both cases highlight how current LAHD attempts to hold Vu and Fink accountable have not adequately enforced the law against their pattern of illegal behavior or maintained safe, decent, and habitable housing for tenants.

⁶⁸ On December 17, 2020 (Case #772532) a tenant noted that trash bins "had been left overflowing on the property for the past 8 months, attracting rats and birds."

⁶⁹ Tenants made two complaints, #648411 on November 17, 2017 and #695116 on October 25, 2018 for insect, vermin, and/or rodent infestation.

⁷⁰ On August 17, 2021, a tenant complained that they were unable to leave the apartment because construction workers placed a stack of doors, inhibiting the tenant from leaving.

Case #712009

On February 16, 2019, A tenant complained about construction in progress without permits.⁷¹ An inspection on February 25 noted that workers had erected new corrugated metal on the exterior of the building, which required permits. Inspectors noted code violations for sanitation and maintenance, plumbing/gas hazard, and illegal construction of new corrugated metal siding on the exterior of the building. On April 9, 2019, a compliance inspection found four unresolved violations⁷² across five units and a Stop Work Order was issued. Furthermore, Vu had not obtained the required permits for the already completed illegal construction. The case was referred to the enforcement section.

Photos for Case #712009. The first photo was taken on February 25, 2019 and the second photo was taken at a reinspection on April 9, 2019. The inspection was for new corrugated metal used as exterior siding and construction in progress without permits. It has not been corrected.



Six months later, a **General Manager’s hearing** was held on **August 21, 2019**. The Hearing was extended until November 6, 2019 because LADBS permits had not been finalized even though the original notice to comply was sent to the property owner in February. The case was closed during a second General Manager’s hearing on November 6, 2019 after VF Developments finally completed the required work and obtained permits.

Case #687598

On April 21, 2018, a tenant made a complaint regarding: construction in progress without permits, Stop work unsafe LEAD practices, building and/or premises unsafe, or unclean, and trash, debris, and/or discard items stored on premise.⁷³ The initial inspection cited 12 violations including smoke detectors not working, illegal

⁷¹ On February 25, 2019, an initial inspection was performed by Housing Inspector Ricardo Bohorquez and an order was issued to the property owner to comply and fix uncorrected violations by April 5, 2019.

⁷² The violations were for illegal construction of metal siding on building exterior, unapproved plumbing for water heater installation that was done without permit or inspection approval, foundation vent screens missing/broken, and premises not maintained in a safe and sanitary condition.

⁷³ Brief timeline for the case: The complaint was filed 8/21/2018. The initial hearing for this case was July 2019. It was accepted into REAP in August 2019. Tenants were unable to pay reduced rent until December 2019. The REAP close date for this building was February 21, 2020.

construction, unapproved electric and plumbing work, dry rot and termites, and a Stop Work Order.⁷⁴ According to the Unresolved Violation Report on May 10, 2019, violations ranged in severity with high severity violations including missing, defective or not hard wired smoke detectors, new unapproved rewiring throughout the entire unit, work not performed to code, and permits not reflecting actual work being performed.

After six more site visits, **a General Manager's hearing was held on July 15, 2019, over a year after the initial complaint.** During the hearing, "Peter Lee appeared on behalf of the owner(s) and testified that all violations have been corrected but he is awaiting final sign-off from LADBS. Lee further explained that their efforts to correct the violations were delayed by uncooperative tenants. Finally, Lee affirmed an intent to schedule both LADBS and Case Management (CM) Final inspections for the case at hand within 10 days." Despite his promises at the hearing, Lee failed to schedule a CM Final inspection within 10 days of the hearing to address these violations. Instead, Lee scheduled a CM Final inspection for another open case which occurred on July 24, 2019.⁷⁵ LAHD accepted the property into the City's Rent Escrow Account Program (REAP) with a rent reduction effective date of August 21, 2019.

However, this decision was not yet final because Peter Lee appealed the decision and stated that all violations had been cleared. The appeals board hearings on November 7, 2019 and November 21, 2019 determined that "no proof of violations being resolved for the subject case existed at the time of the General Manager's Hearing and consequent Decision." After this meeting it was affirmed that the building had been accepted into REAP and the escrow account was opened and established on December 2, 2019 for tenants to pay their rent. On January 22, 2020, General Manager Rushmore D. Cervantes recommended the building be taken out of REAP because "the Los Angeles Housing Department Code Enforcement Unit independently evaluated and determined the cited code violations were corrected." The building was **removed from REAP effective February 27, 2020, just three months after the appeals board hearing.**

Photos taken on August 23, 2018 for an inspection for Case #687598. Inspector Jose Zepeda noted that permits did not reflect actual work being performed



⁷⁴ Source: Unresolved Violation Report as of 5/10/2019

⁷⁵ Case #725885 violations were also for illegal construction performed without permits.

Throughout the past four years, LAHD has been aware that tenants have been living through illegal construction impacting tenant habitability. It took 10 cases about illegal construction before the building was put into REAP and it only took a couple months after the appeals hearing to have it taken out of REAP, despite continuous illegal construction. Even with repeated complaints and violations, LAHD has not conducted a SCEP inspection nor an extensive investigation into the pattern of illegal construction and tenant harassment. Instead, tenants here are written off as complainers and any case that does have a site visit is investigated individually as if it is the landlord's first illegal construction case, without an analysis of the history of abuse and illegal activity at the building.

Threats of Evictions, Attempted Ellis Act Evictions, and RSO Violations to Compel Tenants to Leave

Alongside illegal construction to reduce quality of living, Vu and her staff have threatened to evict tenants, threatened tenants with Ellis Act evictions, and violated RSO protections to convince tenants to leave. On **November 30, 2017**, tenants received a three day notice to quit for nuisance. This would be the first eviction notice of several to come. Vu then attempted to convince tenants to leave through the Ellis Act. Vu's lawyer, Linda Hollenbeck, notified tenants on April 17, 2018, that they would have to move out of the building within 120 days under the Ellis Act.⁷⁶ Vu blamed the actions of tenants for why she was removing the property from the rental market. Linda Hollenbeck later withdrew the Ellis Act notice on August 14, 2018, a day before tenants would have had to vacate the property under the 120 day notice.

At the same time that Hollenbeck was trying to remove tenants through the Ellis Act, Vu continued to harass tenants with false allegations and evictions. On July 10, 2018 a tenant was informed that their rent was past due. Elena I. Popp, a tenant's attorney, notified Victoria Vu that the allegations of past due rent, and the demand for June and July 2018 rent were fraudulent and many tenants had proof that the June 2018 rent was received and cashed.

Concurrently, Vu and Hollenbeck were using the same playbook at 2511 Pennsylvania Ave, a property Vu and Fink purchased on February 14, 2018. Linda Hollenbeck also sent a 120 day notice to terminate to tenants at 2511 Pennsylvania Ave. on April 17, 2018 and submitted a written cancellation on August 14, 2018. At the same time, **Vu was also accusing tenants there that their rent was past due, even though tenants had records that they paid rent on time.** For Vu, the Ellis Act is another tool that she wields, along with

⁷⁶ "The Ellis Act is a California state law that allows landlords to evict tenants in rent-controlled units if they are planning to 'go out of business.' The public excuse for the law was that it would protect small 'mom and pop' landlords who wanted to retire." This definition of the Ellis Act was accessed from latenantsunion.org

illegal evictions, to force tenants to move out.

Tenants at 1486 Silver Lake Blvd. have gone through multiple eviction attempts from Vu. An excerpt from an Affirmative Defenses Attachment details more here:

“This is the 4th Eviction Attempt in the last 13 months. The first 17STUD5129 was filed December 8, 2017 alleging nuisance - dismissed. The second, a re-filing of the first on February 9, 2018 brought on the same grounds was similarly dismissed because the allegations had no proof. On April 17, 2018, 1486 Silver Lake Boulevard LLC attempted to evict Defendants through the ELLIS ACT but they withdrew their petition in August 2018 following three months of aggressive attempts to remove Defendants, once it became evident that Plaintiff never intended to remove the property from the rental market. The sole basis for eviction is to remove tenants so Plaintiff can raise the rent to the current market value.”

Since Vu and Fink took over the building, 1486 Silver Lake Blvd. has had 18 RSO complaints for illegal eviction, reduction of services, illegal rent increases, and failure to post RSO notice. Throughout these cases, Vu was informed that her verbal evictions were illegal, that the attempted rent increase exceeded the Maximum Allowable Rent (MAR), and the requirements to post RSO registration. Despite being notified multiple times by LAHD that her behavior violated RSO rules, there continue to be RSO complaints every year.

At 1486 Silver Lake Blvd, tenants have faced years of harassment through illegal construction, RSO violations, and eviction threats, while being ignored by LAHD. Even when LAHD attempted to hold Vu accountable by placing the building into REAP, the building was quickly taken out of REAP and the same problems LAHD noted before persist. 1486 Silver Lake Blvd. is an example of how never-ending construction is used as a tool of tenant harassment alongside RSO violations and attempts to use the Ellis Act to convince tenants to take buyout offers. Furthermore, the building serves as an example of VF Development's practice of pulling incorrect permits to bypass required inspections and Tenant Habitability Plans with LAHD doing little to reign in this illegal activity.

Tenant Harassment as a Core Strategy

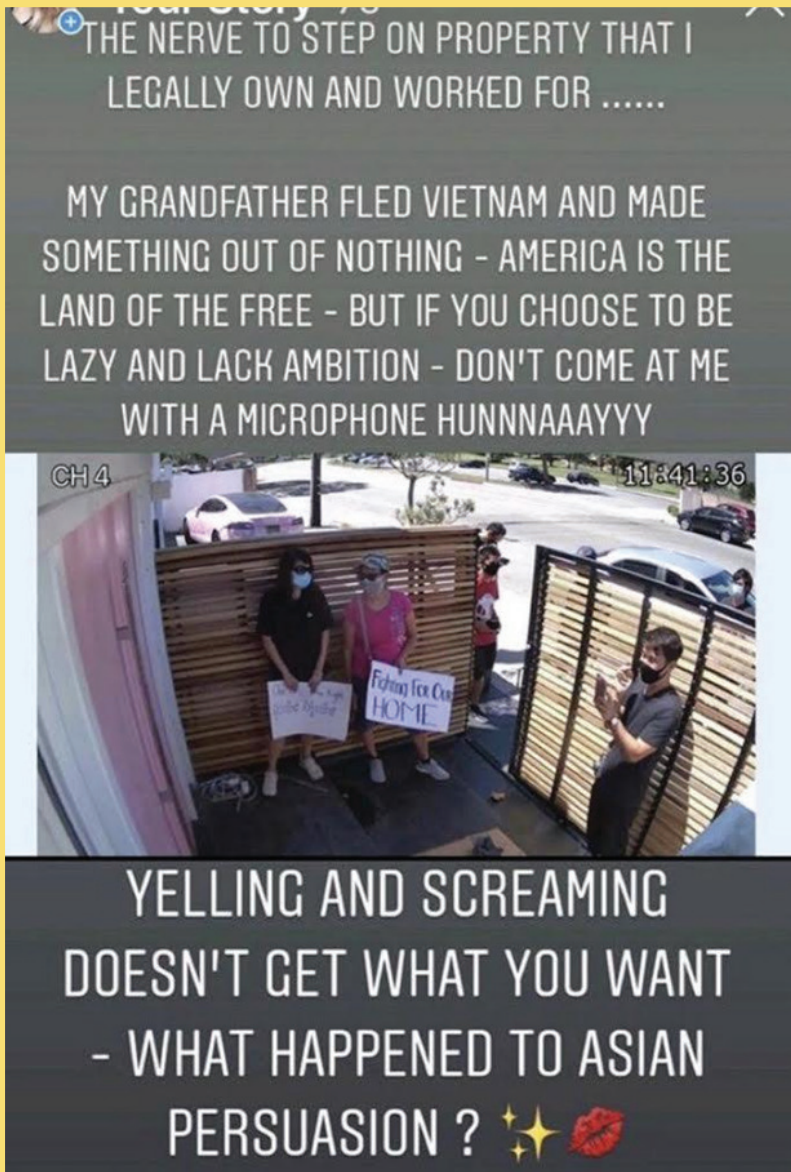
Vu, Fink, and their staff use tenant harassment as a core strategy to remove RSO tenants to redevelop properties. From the Tenant Anti-Harassment Ordinance's list of potential forms of harassment,⁷⁷ Vu/Fink tenants have experienced almost all examples of harassment including:

- Reducing or eliminating housing services required by a lease.
- Failing to perform and timely complete necessary repairs and maintenance.
- Attempting to coerce the tenant to vacate with offer(s) of payments.
- Misrepresenting to a tenant that the tenant is required to vacate a rental unit or enticing a tenant to vacate a rental unit through an intentional misrepresentation or the concealment or omission of a material fact.
- Threatening or taking action to terminate any tenancy including service of any notice to quit or other eviction notice or bringing action to recover possession of a rental unit based on facts which the landlord has no reasonable cause to believe to be true.
- Threatening to or engaging in any act or omission which interferes with the tenant's right to use and enjoy the rental unit or whereby the premises are rendered unfit for human habitation and occupancy.
- Refusing to acknowledge or accept receipt of lawful rent payments as set forth in the lease agreement or as established by the usual practice of the parties or applicable law.
- Disclosing or threatening to disclose to any person or entity information regarding the immigration or citizenship status of a tenant, whether in retaliation for engaging in legally protected activities or to influence them to vacate or for any other reason.
- Retaliating, threatening, or interfering with tenant organizing activities, including forming or participating in tenant associations and unions.

While tenants have the ability to now sue landlords for harassment, few will do so given the high legal costs and fear of further retaliation from the landlord. Furthermore, there are minimal enforcement mechanisms to hold landlords accountable or even monitor patterns of landlord harassment. As the ordinance outlined, landlords often engage in harassment to coerce long-term tenants to vacate the building and charge higher market rate rents. Beyond passing the Tenant Anti-Harassment Ordinance, the city must proactively enforce the ordinance to protect the city's most marginalized community members who deserve rental housing stability and security. Below, we outline Vu's history of active tenant harassment and patterns of willful negligence used to actively evict tenants.

⁷⁷ Examples of tenant harassment comes from Ordinance #187109

Vu and her staff actively harass tenants through neverending unsafe construction, verbal threats, and targeted visits. After rejecting a buyout offer, tenants reported getting contacted regularly through in person visits and endless phone calls by staff pushing them to take the offer. Tenants also documented experiences where **Vu and her staff shouted at tenants threatening to evict them, accusing them of being undocumented immigrants, and telling them that she had the power to kick them out.**



Victoria Vu belittling tenants on her social media when they attempted to deliver their rent payment, calling them lazy, and insulting working class people.

Tenants also documented construction work from 7am to 9pm and construction on Sundays, which is illegal according to the city. When tenants would ask construction workers to not do construction on weekends or late at night, to put away their tools and ladders, and to wear masks during the pandemic, contractors would respond aggressively, yell at tenants, or make fun of them. This behavior is supported by Vu whose business

strategy hinders on dehumanizing tenants and disregarding their needs in the pursuit of profit. Through testimonies, multiple tenants expressed the mental and emotional toll landlord harassment and abuse has taken on them. Many tenants felt both a sense of hopelessness and isolation from what they have had to endure.

One tenant expressed,

“we have gone through a lot and to see my [family] - my [sibling] being scared and my [parent] being harassed when I’m not there - it’s just for me - It’s just stressful because I can’t do anything - I can’t do anything. I can’t.”

920 Everett



920 Everett was graffitied on August 2, 2020.²⁷ Witnesses identified two women, one Asian and bearing the likeness of Victoria Vu graffitiing the building.

The tenants at 920 Everett are longtime residents, stretching back two decades. These Vietnamese, 78 Cambodian, and Thai residents, many of them refugees from war, have made this modest six unit apartment building their home. They live on the edge of Chinatown, a place where they worship at community temples, shop for familiar foods, and visit nearby friends and family.

²⁷ Huang, Josie. 2020. “Vandalism is latest hit for tenants fearing eviction in pandemic.” LAist. <https://laist.com/news/vandalism-tenants-eviction-pandemic-chinatown-coronavirus-everett-street>
<https://www.instagram.com/p/CDZ6gjVgB4I/>

Three years ago, in June 2019, the tranquil life of friends, family and community was shattered by a 60 day quit notice. The ramifications of losing their homes were devastating to these Chinatown residents. Escalating rents in Chinatown and severe overcrowding meant there was little chance of finding anything approaching affordable housing anywhere near their beloved community. Their longtime landlord cut off communication with 920 Everett tenants, refusing their phone calls, emails, and attempts to talk to him in person.

Frustrated that the tenants did not meekly leave their homes, the longtime landlord sold the building to a wealthy westside developer. The new owner issued another 60 day quit notice and also refused to meet, talk, or otherwise communicate with the residents. As the 920 Everett tenants spread news of their plight, there was an outpouring of support from the neighbors on their block, Chinatown residents, housing rights activists and tenants throughout LA.⁷⁹ News of the situation even spread to family and friends in Southeast Asia. With community outrage building and nationwide media coverage, the landlord abandoned his plans to displace the tenants, tear down the building and erect luxury apartments.

In January of 2020, the wealthy westside developer sold 920 Everett to a new developer, Victoria Vu, under the 920 Everett Street LLC. Tenants immediately contacted VF Developments and were told by a VF Developments representative that they had nothing to worry about, VF Developments had no intention of displacing them. A few weeks later, tenants received a 60 day quit notice. All attempts by the tenants to contact Victoria Vu, have been rebuffed. All the tenants received were communications from Linda Hollenbeck, VF Development's attorney, threatening tenants and community supporters with evictions and slander lawsuits. Fortunately, these threatening letters have ceased, in part due to the suspension of Linda Hollenbeck's law license on an unrelated matter of co-mingling of client funds.



In June 2021, the 60 day quit notice was rescinded by Vu and VF Developments, but the harassment by VF Developments has continued:

⁷⁹ Huang, Josie. 2019. "This Vietnamese Grandmother went from Chinatown to Brentwood looking for the landlord trying to evict her." LAist. <https://laist.com/news/this-vietnamese-grandmother-went-from-chinatown-to-brentwood-looking-for-the-landlord-trying-to-evic>

- After tenants attempted to deliver their rent to Vu's home in Costa Mesa, Victoria Vu became angry at the tenants and proceeded to graffiti 920 Everett.⁸⁰ Residents recognized Vu around the building earlier that day and witnesses identified two blond women and a tesla at the building the day of the graffiti. The next day, Vu ordered workmen to paint over the graffiti to hide the results of her tantrum. Vu's erratic and aggressive behavior created a real sense of fear and foreboding among tenants and throughout the entire neighborhood.
- Vu and VF Developments disrupt the peace and quiet of the building and the neighborhood by allowing her employees access to a vacant unit in the apartment building. Tenants described how Vu's employees played music and made noise at all hours of the night and left their possessions strewn through the building walkway. In one instance, Vu's employees created a disturbance where the police were summoned and a person was detained. Access to the building was denied for hours to tenants returning home from work.
- **The property management company has changed four times since Vu purchased the building. There is always an inordinate amount of confusion with each change due to payment websites that do not work properly, conflicting addresses to send the rent to, and unclear due dates and late fees.**
- With each change, tenants are never notified of who they need to contact regarding repairs and issues regarding the rent. Many times a person contacts tenants stating they are representatives of the property management company or the owner. But tenant calls, emails and texts to that person go unanswered. In some cases, when tenants do reach the contact person, they are informed that the contact person no longer works for the property management company or the owner has been fired or quit.
- Tenants have no success in getting repairs made to their units or issues resolved when



Caption: Additional photos of graffiti on 920 Everett Street.

⁸⁰ Huang 2020

they contact the property management or VF Developments. Air conditioning units remain unfixed for years, garbage service is suspended for weeks, exterior lighting is broken or burnt out and sweeping and picking up litter on the building grounds is neglected. Tenants have been forced to fix things and resolve issues themselves or file complaints with LAHD and the Health Department in order to make the owners and property management respond. Some of these repairs were only done due to the timing of a SCEP inspection.⁸¹

- Tenants are often reluctant to request repairs from the property management company and VF Developments because the workmen hired to make the repairs are unqualified and incompetent. **Often repairs are made and the unit is left in worse condition than before the repairs.** One tenant had an air conditioning unit serviced and while the air conditioning unit ended up working, her gas was disconnected and the security bars on the windows were removed and not reattached with no justification for how these security bars affected the air condition. Another tenant had some repairs done to the plumbing and ended up with only scalding hot water with no cold water.⁸²



Security bars over windows at 920 Everett were removed on March 23, 2022 without prior notice or explanation to tenants.

- On March 22, 2022, 920 Everett tenants were given another eviction notice allegedly for failing to pay rent and failure to cooperate in submitting an application to the CA COVID-19 Rent Relief Program. This eviction is both illegal given the current eviction moratorium and based on false information as tenants have applied for the rent relief program. Some applications were denied due to Vu's staff inputting names incorrectly and not submitting necessary documentation. On the same day tenants were handed an eviction notice, Kim

⁸¹ Initial SCEP Inspection #784309 was conducted on August 23, 2021.

⁸² Complaint #791349 was made on August 12, 2021 for water issues and tenant fears of a gas leak. Complaint #796734 was made on October 21, 2021 for inadequate, unapproved, or missing water supply. Complaint #796648 was made on October 20, 2021 for "Windows, doors, cabinets, and frames not operable, defective, missing, and/or unsanitary, GAS, Lack of adequate flow of hot and/or cold running water, Plumbing work or water heater installation done without permit or inspection approval, Leaking or defective plumbing faucet or fixture, Unapproved plumbing gas connectors or valves."

Vu and her contractors removed security bars outside of tenants' windows without notice. This illegal harassment serves to increase tenants' fears of potential break ins.

Willful Negligence as a Form of Tenant Harassment

Beyond the active forms of harassment described above, Vu and her staff through Casa Management harass tenants regularly by failing to perform timely repairs and maintenance and ignoring tenants who express concerns about issues at the buildings. Tenants at multiple buildings outlined how difficult it was to contact anyone at Casa Management and how text, emails, and phone calls went unanswered. Even when a tenant managed to reach a Casa employee who promised that they would send out maintenance, there was rarely any follow up and tenants would be left waiting or having to pay out of pocket to fix these issues. Tenants were told to use an Appfolio page to submit maintenance requests; these **requests would either be deleted from the page or ignored completely**. Given how often management changes (either through staff cycling through buildings or new management companies taking over), tenants often do not know who to talk to about repairs and are required to spend hours finding the right person to contact just to be ignored. Tenants in eight buildings reported 15 individual complaints for the owner or responsible party not posting contact information. Tenants have consistently told us of having to pay out of pocket to fix the issues in their unit, issues that the landlord is required to resolve. This includes issues from flooding and clogs, broken ovens that were provided when moving in, and issues from the in-unit washer/dryer. Even minor issues like the general care of the property are completely ignored. One tenant expressed that **“nobody has come out here to clean this place- and I stress this- in over a year.”** From housing issues to rent payments, Casa Management and previous property managers like VF Developments made themselves completely unavailable to tenants except in the case of code enforcement or RSO enforcement from LAHD. **Tenants note that even when repairs are made, they are often done sloppily and the same problems would arise months later.** All of these problems caused one tenant to say that this was the worst managed apartment they had ever lived in.

Furthermore, Vu and her staff would also remove necessary services in the buildings. As one tenant expressed, “[Vu] failed to pay for garbage collection, so garbage was piling up. She failed to clean the property of leaves and other debris, and it would pile up on the stairs and sidewalk. I often swept the walkways, stairs, sidewalks and carports since I was concerned for the safety of the tenants and the elderly neighbors who liked taking walks past our building and sitting on the ledge of the planter to our building for a break. She failed to even let us know how to pay rent to her prior to the first of the month.”

Tenants experiences of neglect should be understood not just as incompetence but as willfull and

criminal negligence. As the city notes, reducing housing services and refusing to complete repairs required by law are core strategies unscrupulous landlords take to force tenants out of their unit, creating housing instability and infringing on tenants' right to use and enjoy their rental unit in peace. Furthermore, reducing services and refusing to conduct maintenance requests allows Vu and Fink to cut corners and reduce costs at the expense of the buildings' safety and habitability.

Below, we highlight three buildings where refusal to conduct necessary and basic maintenance, unapproved construction, and disregard for LAHD enforcement were active tools to try and push tenants out of the building. At 627 Britannia St., tenants who had refused buyout offers lived with constant noise from construction and the active destruction of the property by removing stairwells and construction causing flooding. Tenants lived with these issues for over a year after making their complaint before the building was put into REAP. At 2743 Fairmount St., Victoria Vu ignored multiple notices to comply and annual rent registration requirements while attempting to illegally evict tenants. Vu ignored violations for ten months for one simple violation- an illegal temporary fence that she had erected around the property that blocked the view of tenants. At Coronado, tenants cycled through the building and quickly moved out given safety issues and management's refusal to address these concerns. The tenants that did stay had to put up with issues regarding lack of water, gas, or heat, and deteriorating building conditions. Read together, these cases demonstrate how Vu and her staff use willful negligence as a property management tool to reduce tenants' quality of living and remove RSO tenants from buildings. Tenants who attempted to use proper means (e.g. filing complaints with LAHD) to have these issues resolved had to wait months for any violations to be fixed.

627 Britannia St.

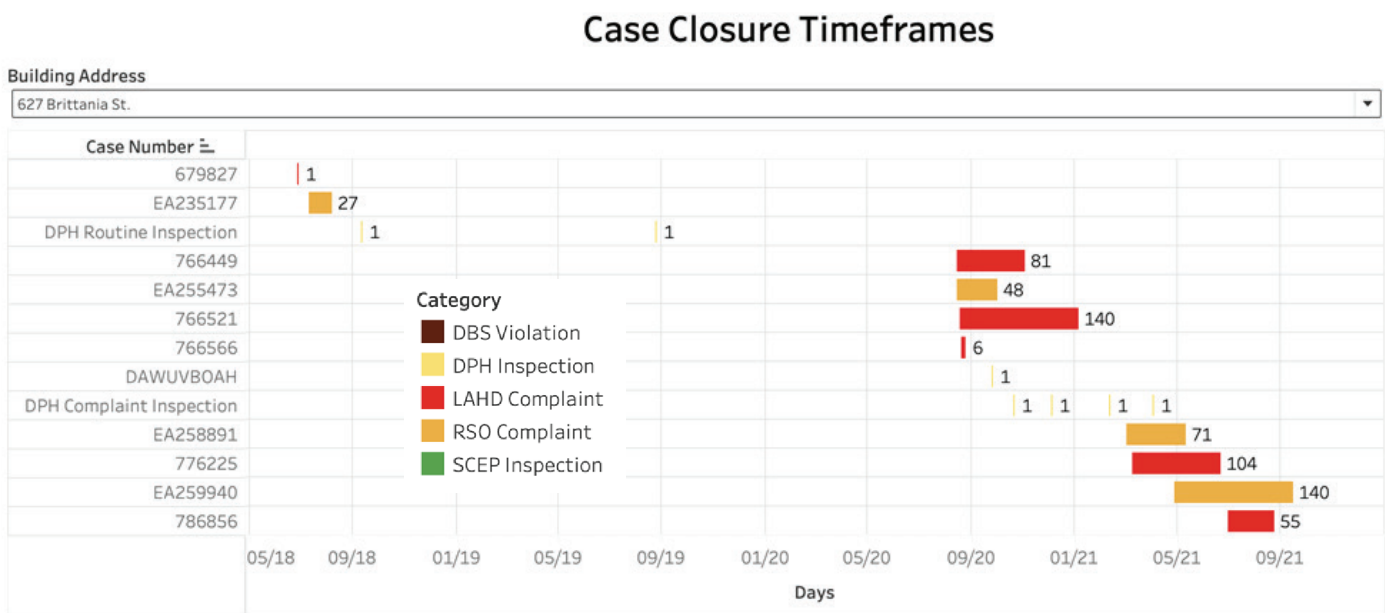
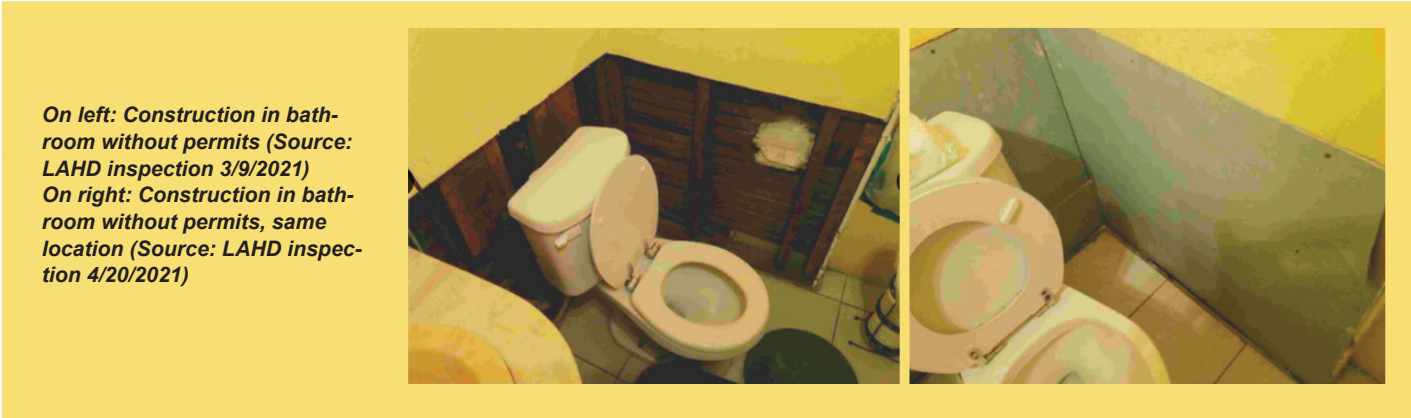


Figure 12. Timeline of Complaints and Inspections at 627 Britannia St.
Note: Numbers next to each event bar indicate the length of time it took to close the case.

627 Britannia St. is a five-unit building in Boyle Heights with many long-time tenants, including one unit that had been living in the building since 1979. Speaking about the building, one tenant noted “this is my first home when I married my husband. I gave birth and raised all of my children in this apartment. This is where my kids learned how to walk, and say their first words. I can’t picture myself anywhere else since this is the only place I envision myself living the rest of my days along with my husband.” Over the years, tenants invested in making the building their home, with minimal maintenance issues or issues with their previous landlord. When Victoria Vu and Jerome Fink took over the building on May 30, 2018, they and their staff began offering tenants cash for keys deals, which most tenants refused.

After refusing the cash for keys offer, tenants began to experience extensive harassment. “Every month they



ve harassment began. Constant banging and use of heavy machinery in the early morning hours. They would start at 6:30 am sometimes and leave at 10 pm every day, that's including Saturday and Sunday. They were breaching our covenant right of quiet enjoyment. After months of this, we would receive a call from Victoria to give us a buyout offer.”

“On July 31st my upstairs neighbor moved out and that was the beginning to an ongoing battle that I feel has no end. On July 31st Victoria and her construction crew purposely flooded my apartment by busting a pipe from the upstairs apartment which caused substantial damage to my bathroom ceiling. That same week Victoria came to look at the damage and said ‘oh no you guys have to move out and accept an offer or we’re going to have to evict you.’ Evict us? For damage she purposely caused to get us to move out?”

Despite excessive harassment and active destruction to their home, tenants actively fought to be able to safely stay in their homes, alerting LAHD, the Health Department, and Building and Safety. Inspections on August 17 and August 19, 2020⁸³ noted multiple violations that affected tenants’ health and safety including ceiling damage from flooding, broken windows, a lack of hot water, and the removal of a stairway without notice or permits. The illegal removal of the stairs is extremely dangerous as tenants living on the second floor were not aware that the stairs would be removed and tenants with disabilities now have to walk around the entire building to get up to the second floor.



Removal of stairway without permits. (Source: LAHD inspection on 8/17/2020)

Furthermore, inspectors noted electrical, plumbing, HVAC, and other construction work happening without required permits. Through numerous reinspections, LAHD inspectors noticed continuous construction in the unit but no new permits; inspector photos note holes that were created for unregulated electrical work were later patched up. From August 2020 to April 2021, LAHD received multiple calls from Vu’s contractors, from her mother Kim Vu, and from other property managers about their efforts to obtain required permits, with no actual evidence of permits. Throughout this time, Vu’s staff continued to conduct construction without per-

⁸³ An initial inspection for complaint #766449 was conducted on August 17, 2020. The inspection noted the following violations: illegal removal of stairs at unit #629 ½, damage caused by water intrusion at ceiling, damaged ceiling and walls, windows that did not properly open and close. The initial inspection for complaint #766521 was conducted on August 19, 2020. The inspection noted illegal construction for renovation of the entire unit (1st floor, east side) remodel including but not limited to: installation of all plumbing and electrical fixtures, split HVAC system, panel install in kitchen.

mits. Their construction work actively inhibited tenants' right to quiet enjoyment of their home and safe housing. In March 2021, flushing in the upstairs unit caused a leak in the unit below.

In March 2021, tenants filed further complaints of illegal construction in the building.⁸⁴ As a result of the unapproved plumbing work done in the unit above, Vu's contractors began to conduct construction without permits in the unit below to address leaking. Once again, inspectors verified that Vu had not applied for any required permits for the wall and ceiling and unapproved plumbing. Between inspections, LAHD noted that construction continued to be done without any permits.



Construction performed without permits (Source: LAHD inspection 8/19/2020)

Throughout these damages, tenants and investigators had difficulty getting in contact with Victoria Vu, Jerome Fink, or any property managers. Since taking over the building in 2018, there have been five management companies (from South Pacific Real Estate Inc to JRealty to VF Developments to Casa Management

and now to Drake Realty). Tenants would make numerous calls to management to address leaking, broken windows and other issues before reporting their issues to LAHD. Even as LAHD was investigating these violations, they had difficulty reaching Vu or a responsible party because of constant staff and contractor turnover. Beginning in December 2020, inspectors had multiple calls with Kim Vu, Victoria's mother and property manager, about the permits required for each unit.⁸⁵ Despite Kim Vu telling LAHD that she was still trying to get the required permits, her staff would continue to perform construction without permits.

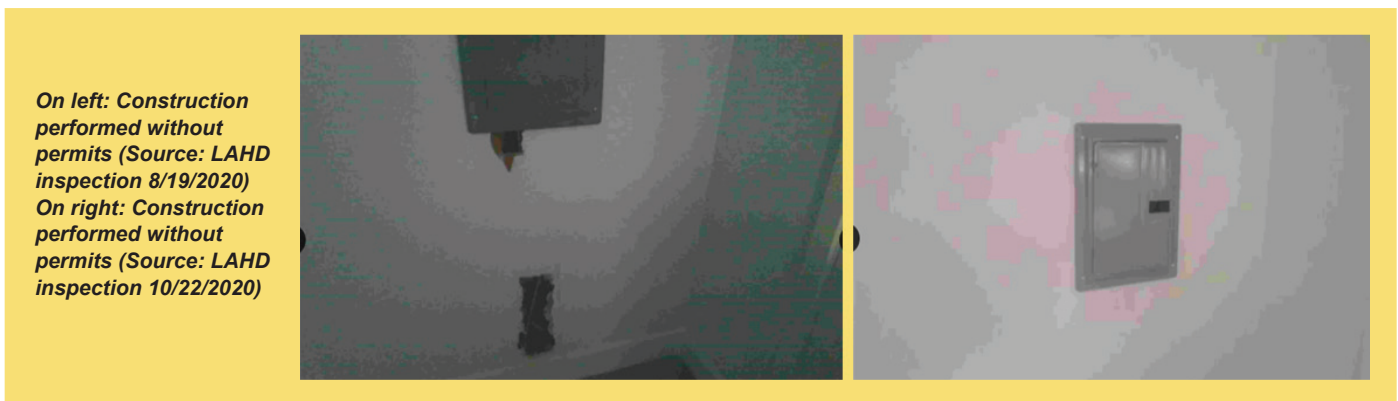


Removal of stairway without permits. (Source: LAHD inspection on 10/5/2020)

⁸⁴ Complaint #776225 for illegal construction, unapproved plumbing, and possible unsafe lead work practices.

⁸⁵ LAHD noted contact with Kim Vu, representative for the owner Victoria Vu on December 17, 2020, December 24, 2020, March 18, 2021, March 19, 2021, (for Case #766521) and March 9, 2021, April 20, 2021, and June 8, 2021 (for Case #776225), and on July 7, 2021 and October 7, 2021 (for Case #786856).

In the midst of tenant harassment and destruction, tenants also experienced landlord harassment through illegal eviction and illegal rent increase attempts. **Vu's staff gave conflicting addresses to send their rent to, and then attempted to evict them by claiming they were not paying their rent.**⁸⁶ Vu's staff also gave tenants verbal notices of eviction in the middle of the pandemic and eviction moratorium.⁸⁷ Furthermore, Casa Management attempted to illegally raise the tenant's rent, which is illegal under the local emergency period.⁸⁸



All of the health and safety issues tenants have faced since 2018 have been actively caused by Vu and her staff. Vu's staff removed a stairway from the second floor without prior notice to tenants who rely on that stairwell. Construction without permits or inspections caused flooding and water damage to a tenant's unit. Then to address the flooding created, Vu's staff conducted unsafe construction without permits. Throughout all of these violations, tenants at 627 Britannia St. continue to fight for safe and habitable housing free from landlord harassment. Due to the tenant's continuous effort, tenants were able to push for a General Manager's hearing that neither Vu nor any of her staff attended, and the building was put into REAP on July 30, 2021. Despite being informed by tenants that Vu and her staff were using these code issues to harass tenants, LAHD refused to act, citing that they "only deal in facts and not assumptions." This disregard for tenants' lived experiences delayed the process for putting this building in REAP and allowed Vu and her staff to continue to harass tenants, destroy their building, and reduce their quality of living for over a year. Even after the building was put into REAP, Vu and her staff have still not pulled all required permits or addressed the myriad of issues in the building that they created. For Britannia tenants, getting the building into REAP is the first step to protecting their home. For tenants, "winning would be that every tenant that fought to stay in their home would stay in their home without the stress and anxiety brought by bad landlords. That city officials actually take forcible action against these types of bad landlords/investors."

⁸⁶ RSO complaint #EA235177 was initially made on July 10, 2018 about an illegal eviction due to the landlord giving various addresses to send rent.

⁸⁷ RSO complaint #EA255473 was initially made on August 14, 2020 of an illegal verbal eviction.

⁸⁸ RSO complaint #EA259940 was made on April 28, 2021 of an illegal rent increase.

2743 Fairmount St.

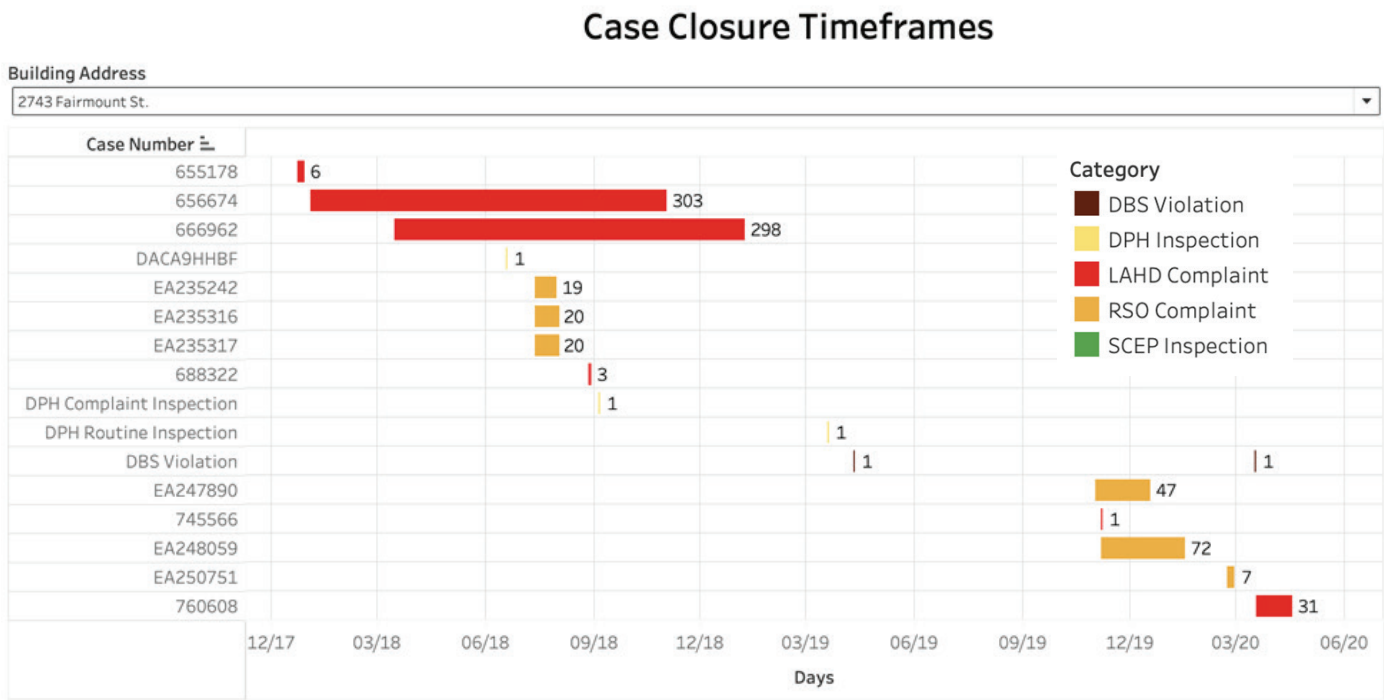
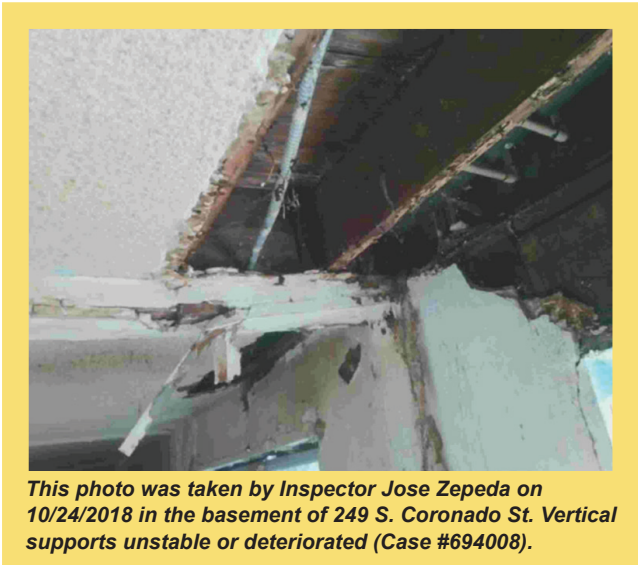


Figure 13. Timeline of Complaints and Inspections at 2743 Fairmount St.
Note: Numbers next to each event bar indicate the length of time it took to close the case.

2743 Fairmount St. is a six-unit building in Boyle Heights. Before Jerome Fink bought the building (under 2743 Fairmount Street LLC) on September 6, 2017, the majority of tenants in the building had lived there since the 1970s and 1980s.⁸⁹ Three months after Fink bought the property and Victoria Vu introduced herself to tenants as the new landlord, tenants complained of construction in progress without permits.⁹⁰ A LAHD inspector found that VF Developments had erected a temporary perimeter fence surrounding the property. Tenants and VF Developments staff informed LAHD that Vu was currently in the process of offering cash for keys to move tenants out of the building and remodel the property. Beginning in Jan-



⁸⁹ Move-in dates were reported to the Rent Registry form noting that in one year, tenants living in the building had moved in in 1976, 1977 (two units), 1985, 2009, and 2016.
⁹⁰ Complaint #655178 was reported on December 22, 2017 about construction in progress without permits, and unclear/unsafe building.



Temporary perimeter fence around the property (Source: LAHD inspection 8/27/2018)

January 2018, LAHD inspectors conducted **twelve** inspections and verified that the fencing was still up while there were no permits pulled for construction that would necessitate the fence.⁹¹ Furthermore, inspectors cited violations for overgrown vegetation in the front yard, damaged ceilings and walls, missing fire separation between water heaters and units, missing fire extinguishers, and the lack of trash bins. Throughout 2018, Vu ignored LAHD inspectors and tenants who requested she fix a simple code violation by removing the fencing around the building. Rather, she spent her time attempting to illegally evict tenants. In July 2018, three units informed LAHD that Vu was attempting to evict them, claiming that their rent was past due.⁹² An investigation showed that these claims were false and that she further failed to register the building and pay annual rent registration fees. It was only after being notified of a General Manager's hearing that Victoria Vu responded to LAHD inspectors to note that she was fixing the exterior violations, in November 2018.⁹³

Vu's treatment of tenants at 2743 Fairmount St. demonstrates her unwillingness to follow basic LAHD requirements. For eleven months, she refused to respond to LAHD staff or tenants to remove a fence that she had put up for no reason. During those months, she actively harassed tenants by threatening evictions and falsely accusing them of not paying rent. As noted in multiple other cases, Vu is willing to let violations go unresolved until they require a General Manager's hearing. **Her disregard for LAHD policy or basic decency hurts tenants who had to live with fear that she would illegally evict them and their view be obstructed for almost a year.** Furthermore, her active negligence of the building and tenants created an unnecessary administrative burden for LAHD inspectors who had to continually arrive at reinspections just to find that she refused to show up or respond to phone calls. All LAHD documents were also sent to Jerome Fink's personal address at 1511 Kings Rd, indicating that he was also notified multiple times of the violation and inspections and did nothing to address tenant concerns and LAHD violations.

⁹¹ A total of 12 inspections were held for four cases (one inspection for #655178, six inspections for #656674, three inspections for #666962, and two inspections for #688322).

⁹² Illegal eviction complaints were made on July 12 and July 13, 2018 (Case #EA235242, EA235316, and EA235317).

⁹³ Victoria Vu contacted LAHD on November 1, 2018 regarding corrected violations for Case #656674 (temporary perimeter fence consisting of link wire and green mesh tarp around property). The initial complaint was made on January 2, 2018. A General Manager's hearing was held on January 31, 2019 for Case #666962 regarding "failure to maintain required fire extinguishing system, separation between boiler/central heating/water supply from rest of building, paint damaged walls, broken light fixture." The initial complaint was made on March 15, 2018.

249 S. Coronado St.

Case Closure Timeframes

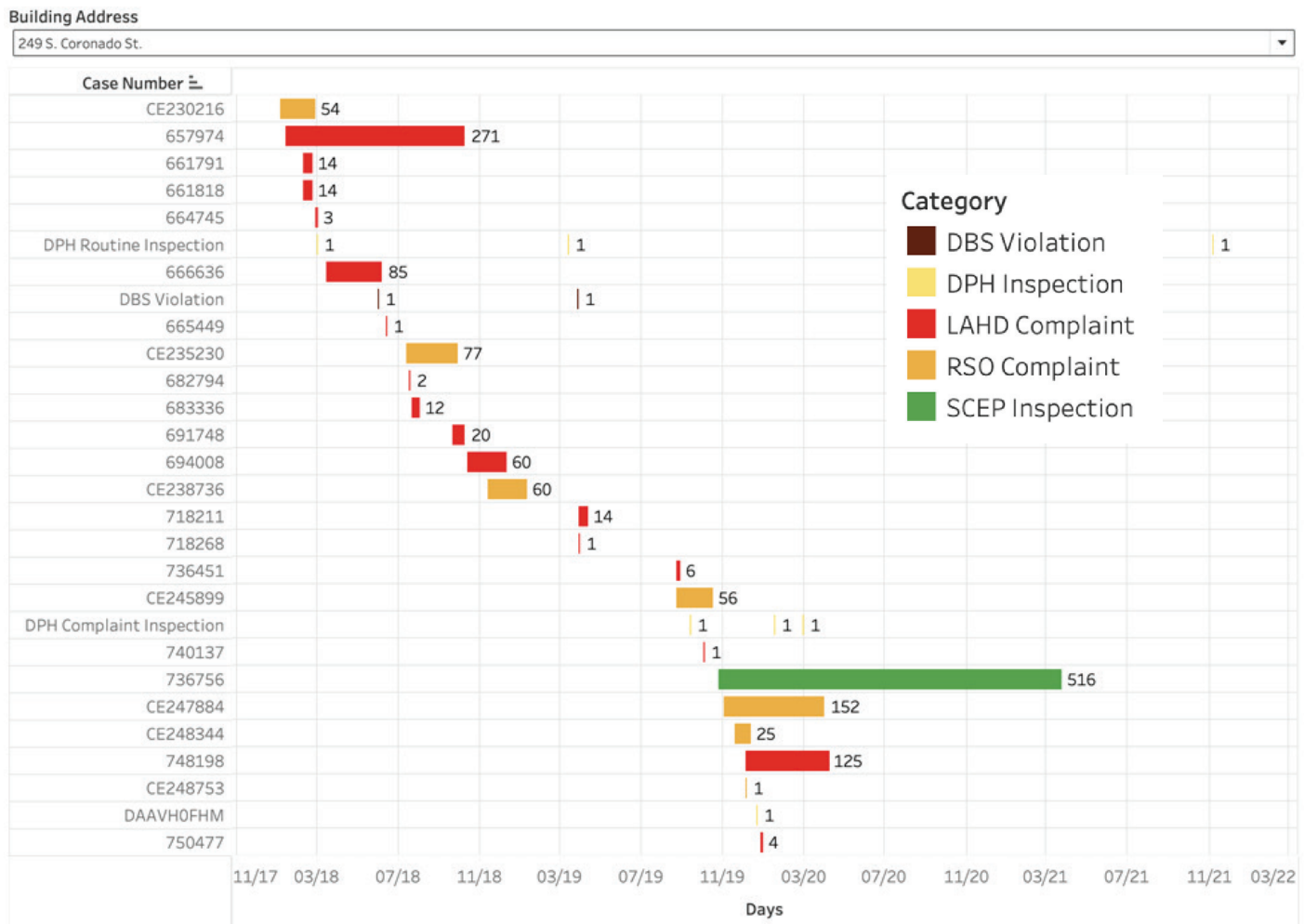


Figure 14. Timeline of Complaints and Inspections at 249 S. Coronado St.

Note: Numbers next to each event bar indicate the length of time it took to close the case.

249 S. Coronado St. is an eight unit apartment complex purchased by 249 S Coronado Street LLC C/O Jerome Fink on December 21, 2017. Immediately after Fink purchased the property, tenants began to experience issues related to gas, water, and heat being turned off, deteriorating conditions, and a negligent landlord that ignored maintenance requests. After some tenants took buyout offers, Vu began treating the building as vacant at the expense of remaining tenants. A tenant initially made a complaint on February 7, 2018 for lack of combustion air for gas appliances.⁹⁴ This complaint was closed without a site visit. On February 26, 2018 another complaint was filed with the comment saying “owner turned off gas because six units

⁹⁴ Complaint Case #661791

are vacant, and only two units have tenants and they all share the same meter so owner doesn't want the remaining two tenants to have gas.”⁹⁵ SoCal gas confirmed that gas was shut off for the building because it was considered vacant, even though tenants still lived in the building.

Destruction of Utilities and Housing Quality

Additionally, tenants made three complaints about a lack of hot water, the first complaint being made in March.⁹⁶ After a city approved contractor replaced the broken electric water heater in June, tenants called again regarding issues with the hot water. When LAHD called Victoria Vu about the Two Day Order for the hot water, she stated that she had received a bill from the city for a new water heater so the issue was not her responsibility.⁹⁷ However, a site visit with the contractor showed that the water heater installed in June was already damaged in July due to Vu's workers turning off the water continuously. A tenant informed LAHD that construction workers had turned water off for the entire day and when the water was restored, he did not have any hot water.

On October 12, 2018, a complaint was filed for floor covering defective, missing, or unsafe, plaster/drywall wall/ceiling covering defective, deteriorated, or paint is peeling, heater, exhaust fan, or air conditioner installation/repair done without permit or inspection approval, and room heating appliance missing or defective.⁹⁸ During an inspection on October 24, the inspector noted that vertical supports in the basement were unstable, plaster and drywall was defective, a plumbing fixture's surface was damaged, and a heating appliance was not working. Within a year of owning the property, tenants had submitted six complaints regarding issues to their electricity, water, or gas.

A tenant that moved in February 28, 2019 filed a complaint one month later for two windows that needed fixing and a lack of hot water in the kitchen and shower.⁹⁹ The tenant reported that Peter Lee, of VF Developments, had promised to replace the two windows when they moved in but hadn't, and they felt unsafe in the apartment because outsiders could break in given that there were no screens and only broken glass on the windows. Furthermore, the tenant did not have hot water in either the kitchen or shower. The case was closed on April 11, 2019 because the complainant had moved out of the building. **The tenant stayed for less than two months in the unit.**

⁹⁵ Complaint Case #664745

⁹⁶ Complaint Case #666636 was made on March 19, 2018, #682794 was made on July 17, 2018 and #683336 was made on July 20, 2018.

⁹⁷ LAHD staff talked to Victoria Vu on July 24, 2018. The inspector log noted that “she stated that she was aware of the Two Day Order and stated that she received a bill from the city for a new water heater so the issue is not her responsibility. I informed her that problem is a new issue.”

⁹⁸ Case #694008

⁹⁹ Case #718211 was filed March 28, 2019.

While remaining tenants were forced to live without utilities, Vu was focusing on conducting illegal construction on the property. On October 25, 2019 Clarissa Monterossa Siemens visited for an **initial SCEP inspection** with the property manager Sang Pham.¹⁰⁰ In the inspection report, there were 24 noted violations, 17 of which were for illegal construction work that required permits and approvals from LADBS. At a SCEP reinspection on October 15, 2020, Anthony Garcia, who works with the property owner, stated that he had just gotten a copy of the notice to comply, none of the work had been done, and the management company had been let go. In January 2021, the new manager, Kim Vu emailed photos of the construction work to LAHD, which showed that the **“corrections were done in poor workmanship.”**



This photo was taken by Inspector Jose Zepeda on 10/24/2018 in the basement of 249 S. Coronado St. Vertical supports unstable or deteriorated (Case #694008).

On December 15, 2019 a tenant had notified management via text that the heater/air conditioning unit was not working. They attempted to contact the property manager multiple times to have the heater/air conditioning unit repaired but nothing had been fixed. It was 40 degrees at night with no heater.¹⁰¹ At 249 S. Coronado St., Vu and her staff displayed a pattern of illegal construction work impacting tenant habitability, destroying tenants' utilities and access to gas, hot water, and electricity, and refusing to follow through on promises to fix units.

Removal of Rent Stabilization Ordinance Tenants

As with other buildings, Vu coupled her illegal construction at 249 S. Coronado St. with illegal eviction attempts. On July 10, 2018 the tenant received a three day notice that their rent was 90 days past due. **The tenant had been sending rent to the wrong address because the landlord never notified the tenant in writing of the correct address where rent payments should have been mailed.** In an email, LAHD was informed by Attorney Eric Bravo on November 15, 2018 that “the eight unit property was purchased in December 2017 by 249 S Coronado Street LLC and shortly thereafter (within days) most of the tenants were

¹⁰⁰ Case #736756. A follow up SCEP inspection occurred on January 22, 2020.

¹⁰¹ The tenant filed a complaint regarding the broken heater on December 26, 2019 (Case #750477).

offered and accepted buyouts. As of today, seven units remain vacant with only unit occupied by two tenants who've lived there over 40 years and to this day continue to receive buyout offers, the latest verbal offer occurring last week." When CCED volunteers visited in April 2021, they met only one tenant who lived here. The remaining units remained vacant. Vu and Fink buy buildings, attempt to buy out tenants, and perform construction without permits on vacant units. Even after, the units sit empty because new tenants quickly notice poor housing conditions and failed promises by their leasing agent to fix these issues, thus destroying housing stock.

Vu and Fink's operation frequently relies on reducing or eliminating housing services required by a lease, failing to perform and timely complete necessary repairs and maintenance, and attempting to coerce the tenant to vacate with offer(s) of payments to get RSO tenants to vacate the building. Vu and her staff drag their feet to address both minor issues such as removing an illegal fence that they erected and major issues including illegal construction, the illegal removal of a stairwell, and removing water and gas facilities for tenants. Vu and Fink, through their LLCs and property management companies, are simply not interested in managing the property to provide safe, decent, and habitable living conditions for residents. On the contrary, Vu's intention is to create a turbulent and inhospitable environment to drive the tenants out.

*Paint exterior at 2561 W Ave 30
(Source: CCED Volunteer Outreach 9/28/2021)*



Conclusion

From small tasks including giving tenants back their security deposit and paying for garbage collection to major issues such as addressing leaks and mold, structural failures, and responding to General Manager's hearings, Vu, Fink, and their staff prioritize making a profit over maintaining safe, habitable, or affordable housing for tenants. For many tenants living in these buildings, their experience with Vu and her staff was the beginning of their struggles with landlord harassment and reduced housing quality after living safely in these buildings for decades. This is not an isolated incident of a few bad actors but is a consistent pattern of landlord harassment and abuse that exists across Los Angeles. Through our work in Chinatown and across the city, we have witnessed multiple instances of landlords disregarding housing code regulations and health and safety regulations. From large 16-story buildings like Cathay Manor to Single Room Occupancy (SRO) buildings like 651 N. Broadway, tenants have largely been left on their own to fight landlord harassment and mismanagement. The issues noted in this report are not new to LA either, the Blue Ribbon Citizens' Committee on Slum Housing identified many of the same problems in 1997.¹⁰² Lack of accountability or code enforcement has allowed landlords to destroy the number of safe and affordable housing in LA, at the expense of working class tenants.

City officials have failed tenants at all levels of leadership and each department has a role to play in addressing these issues. Despite continuous complaints, inspections, and violations, LAHD has done little to actually hold Vu and Fink accountable for maintaining safe, decent, and affordable housing. Even when LAHD uses the greatest forms of accountability, Vu and Fink disregard the consequences of REAP cases and General Manager's hearings and continue their pattern of ignoring violations, conducting construction without permits, and harassing tenants to accept cash for keys deals. LAHD often writes off violations for construction without permits when VF Developments files for permits retroactively. Neither LAHD nor the Department of Building and Safety (LADBS) conduct inspections to investigate the construction done prior to receiving permits but falsely assume good faith that construction only began after permits were granted. When tenants note issues with vermin, pests, mold, or dirty carpeting, LAHD refers tenants to the Health Department, who do minimal inspections in multifamily housing and rarely cites landlords for these health issues. When the City Attorney is referred cases by LAHD, they rarely file charges or prosecute landlords. The City Attorney also defunded and shut down the Slumlord Investigative Task Force, which worked to investigate and prosecute slumlords. Furthermore, City Council passes ordinances to protect tenants from landlord harassment and make claims that they seek to preserve affordable housing but do little to adequately fund departments to properly address these issues.

¹⁰² Blue Ribbon Citizens' Committee on Slum Housing. 1997. "The Slum Housing Problem in Los Angeles and the Department of Building and Safety."

While LAHD officials have told us that they have the ability and power to investigate landlords with patterns of housing violations, this has not been done for Vu and Fink despite having five buildings in REAP. Throughout conversations with city officials, there is little interest in investigating the landlord's work holistically, rather focusing on evaluating issues building by building or pushing responsibility away from their individual department. Even within LAHD, there seems to be little investigation between the RSO inspectors, complaint inspectors, and SCEP inspectors to note patterns of abuse and code violations. This allows landlords to get away with large scale patterns of tenant harassment and poor construction and maintenance work. The lack of coordination or effort between offices to protect tenants from slumlord tactics after the dissolution of the Slum Housing Task Force incentivizes these illegal strategies because slumlords know there will be few consequences for their behavior and large payouts. Through our research of city and county housing policy and conversations with tenants about their needs, we compiled the following policy demands to address this broken system. These demands focus on increasing accountability and collaboration between departments and increasing transparency for tenants.

Demands

1. The City Attorney must launch an investigation into the predatory behavior and illegal activity of Victoria Vu, Jerome Fink, VF Developments, and the Bascom Group and pursue civil and criminal charges. Vu and Fink cannot be allowed to hide behind their LLC's or the multitude of property management companies they have cycled through.

The city has a responsibility to address the hundreds of violations, history of non-compliance, tenant harassment, and illegal activity conducted by Victoria Vu and Jerome Fink. The City Attorney must take immediate action to investigate Vu and Fink and prosecute to the fullest extent of the law, and levy financial penalties for the hundreds of housing and construction violations. For illegal activity found, Vu and Fink's properties should be seized by the city and placed into a receivership, and landlords who violate city regulations should not be allowed to pull construction permits, purchase buildings for purposes of investment, and operate business as usual.

Before and after (Source: Right: Apartments.com; Left: CCED Volunteer Outreach 10/5/21)



Investigate the pattern of code violations and illegal construction, and levy financial penalties for the failure to comply with building codes and regulations. The Department of Building and Safety cited Vu and Fink for numerous violations and illegal construction without permits. This construction often endangered tenants and damaged their units. No fees or penalties have been enforced against Vu and Fink, despite LAMC outlining clear penalties, citations, and consequences for violations. Vu and Fink should not be allowed to continue to pull construction permits. Furthermore, LAHD and the Department of Public Health should coordi-

nate to complete prompt inspections at each property, with language accessible inspectors so that tenants can express their issues and concerns.

Investigate Vu and Fink for RSO violations and tenant harassment. Tenants experienced harassment through threats of ICE deportations, fictitious Ellis Act applications and lawsuits, illegal construction, and hazardous conditions in their units. Vu and Fink utilize these tactics to pressure tenants to accept cash for keys offers. The city must investigate these cases across multiple properties systematically, and not as individual, separate issues at each building. Vu and Fink should be prosecuted for violating numerous RSO violations as well as the Tenant Anti-Harassment Ordinance.

Seize Vu and Fink properties, and place them in a receivership. Vu and Fink have proven to be abusive and criminally negligent landlords, and their properties must be seized by the city and placed into the care of a responsible actor. The current LAHD enforcement in the forms of General Manager's hearings and REAP have not proven to correct Vu and Fink's behavior, and the city must take further action to hold these landlords accountable.

Precedent exists for a city to take buildings from control from abusive landlords. In 2019 in San Francisco, a judge ordered for Anne Kihagi's buildings to be placed under control of a court-appointed receiver. Similar to Vu and Fink, Kihagi purchased rent stabilized buildings, illegally harassed and evicted tenants, and racked up hundreds of code violations. City Attorney Dennis Herrera pursued an injunction against Kihagi, ultimately leading to her properties being taken away.¹⁰³

Remove Vu and Fink's real estate license and prevent them from owning properties for the purposes of real estate investment. Vu and Fink are allowed to continue purchasing properties and operating in the real estate business despite accumulating complaints and violations, many of which have not been resolved. Like any commercial industry, the City Attorney should take steps to regulate exploitative real estate practices and remove Vu and Fink's real estate licenses.

¹⁰³ Eskenazi, Joe. 2019. "Anne Kihagi, city's 'cruellest landlord,' has last of her known San Francisco properties wrested from her control." Mission Local. <https://missionlocal.org/2019/07/anne-kihagi-citys-cruellest-landlord-has-last-of-her-known-san-francisco-properties-wrested-from-her-control/>

2. Reestablish, empower, and invest in the Interagency Slum Housing Task Force to investigate and file civil and criminal charges against predatory landlords.

The current enforcement of predatory and abusive landlords in the form of inspections, reinspections, hearings, and REAP is inadequate and does little to hold landlords accountable or correct their behavior. Landlords who repeatedly violate city policies and housing regulations must be held accountable and face escalating civil and criminal charges, and ultimately lose their right to own properties for the purpose of real estate investment if they continue to violate the law. Resurrecting and investing in a functioning Interagency Slum Housing Task Force would improve much-needed coordination between departments, as well as empower deputy attorneys to pursue criminal charges against abusive landlords.

The city needs to escalate the punishment for repeat violators to include civil and criminal charges, and enforce regulations accordingly. As seen in this report, Vu and Fink were cited for hundreds of violations and complaints, and failed numerous LAHD inspections. Several properties were in such distress that they were referred to General Manager's hearings and entered into REAP. Tenants are told that their cases are being referred to the City Attorney, but no further action is taken.

The current methods of enforcement from LAHD are slow and ineffective. Violations go into a cycle of citation, inspection, reinspection, and renote with little incentive for the landlord to correct the violations in a timely manner. At 627 Britannia St., a year of inspections and reinspections took place before the building entered REAP, and at the time of release of this report, Vu and Fink have not yet resolved the violations. Under the current system, landlords like Vu and Fink face little to no consequences, fines, or punishments, and are allowed to operate business as usual.



Unfinished construction/holes on the ceilings of roofs at 249 S. Coronado St. (Source: CCED Volunteer Outreach 4/4/2021)

The Blue Ribbon Citizen's Committee in 1997 identified this issue as an "endless 'loop' of inspection, notice, partial compliance, reinspection, renotice, and so on." To address the lack of accountability and compliance, the committee recommended clearly communicated enforcement, and an "expanded use of a wider range of enforcement devices appropriate to the violations" which included injunctions against repeat offenders.¹⁰⁴ We largely agree, and argue that landlords should face specific, timely, and escalating consequences in the forms of fines, civil, and criminal charges that hold them accountable and motivate them to respond to violations and maintain their properties. Repeat violators should be flagged by LAHD, with timely enforcement and prosecution when necessary. This approach would effectively motivate landlords to address violations, and cut down on the number of inspections and reinspections required.

Resurrect and Empower the Slum Housing Task Force. Established in 1980, the Los Angeles Interagency Slum Housing Task Force was made up of the County Health Department, the City Building and Safety and Fire Departments, and lawyers from the City Attorney's office, and successfully prosecuted abusive landlords and filed criminal charges.¹⁰⁵ While the task force was not without its flaws and had limited capacity and resources, they were nevertheless identified by the Blue Ribbon Citizen's Committee as "doing a good job in addressing the 100 or so buildings that become its targets at any one time." ¹⁰⁶ In recent years however, the task force has been underfunded, steadily declined, and seems to have been dissolved completely.¹⁰⁷

Without coordination and the ability to enforce regulations, local agencies pass responsibility between each other, remain mired in confusion over jurisdiction, waste resources, and ultimately fail to take sufficient action to protect tenants. Both the 1997 Blue Ribbon report and more recent research has highlighted the necessity of interagency coordination in standardizing effective code enforcement.¹⁰⁸

¹⁰⁴ Blue Ribbon Citizens' Committee on Slum Housing. 1997. "The Slum Housing Problem in Los Angeles and the Department of Building and Safety." p. 26.

¹⁰⁵ Hurst, John. 1986. "Houses of Horror" Los Angeles Times. <https://www.latimes.com/archives/la-xpm-1986-06-08-me-9475-story.html>

¹⁰⁶ Blue Ribbon Citizens' Committee on Slum Housing. 1997. "The Slum Housing Problem in Los Angeles and the Department of Building and Safety." p. 7.

¹⁰⁷ McGreevy, Patrick. 2001. "Many Battles for Slum Task Force." Los Angeles Times. <https://www.latimes.com/archives/la-xpm-2001-aug-18-me-35601-story.html>

¹⁰⁸ Domingo, Maddisen. 2012. "Slum Housing and the City of Los Angeles: An Analysis of the Intersection of Human Rights and Enforcement Policies." https://www.oxy.edu/sites/default/files/assets/UEP/Comps/2012/2012/Domingo%2CMaddisen_SeniorComprehensive-Final_0.pdf

This interagency task force should include LA Housing Department (LAHD), Department of Building and Safety (DBS), Department of Public Health (DPH), and the City Attorney to investigate slumlords and their patterns of harassment, destruction of safe housing, and illegal construction across all their buildings. Unlike the past iteration of the task force, the city must provide the resources required to enforce housing regulation for all slum housing in Los Angeles, and not just the few most serious cases in the largest buildings. This should include the increased recruiting and training of deputy City Attorneys in housing enforcement, utilizing technology to integrate data on properties and landlords across departments, and funding housing inspection and code enforcement programs.

Currently, the majority of property-related cases pursued by the City Attorney's office are under the Citywide Nuisance Abatement Program, a tool to increase policing and surveillance of "gang-controlled" neighborhoods for capital investment and redevelopment.¹⁰⁹ Independent of the Los Angeles Housing Department, these cases are more so an approach to tackling public safety and crime, rather than dealing with landlord harassment of tenants, habitability issues, illegal property construction, and holding landlords with REAP properties accountable. In fact, the City Attorney's office rarely pursues criminal charges against landlords on the basis of housing code violations, despite the historic precedent of the task force.¹¹⁰

Tenants in REAP properties are told that their cases have been referred to the City Attorney's office, but are given no future updates and the process of accountability for landlords essentially ends there. A task force and increased capacity of the City Attorney's office would ensure that more can be done for tenants facing harassment and habitability issues, and so that more effective legal action can be taken against abusive landlords.

Landlords who continue to fail to follow the law must face injunctions that prevent them from owning buildings for the purpose of real estate investment. In properly regulated industries, operators that violate the law and engage in unethical behavior face severe consequences. A doctor who engages in unethical

¹⁰⁹ Graziani, Terra, Joel Montano, Roy, Ananya, and Stephens, Pamela. 2021. "Property, Personhood, and Police: The Making of Race and Space through Nuisance Law." *Antipode*. 10.1111/anti.12792.

¹¹⁰ The recent criminal charges against Don Toy and CCOA, the owner and operator of Cathay Manor, is the only time in the past three years in which a landlord has had criminal charges filed against them based on housing code violation.

behaviors and malpractices may lose their medical license. A contractor that operates without a proper license may be suspended. There is no reason for real estate developers and landlords to not face a similar consequence. Landlords like Vu and Fink, with hundreds of violations and documented tenant harassment, should be forced out of the real estate business.

Landlords and real estate companies should not be allowed to continue with business as usual if their properties are not up to code and their tenants are living with safety hazards. Vu and Fink repeatedly demonstrated criminal negligence and the inability to manage their properties in a safe manner; yet again and again were allowed to continue pulling permits, purchasing properties, and endangering more tenants.

Establish a public and accessible registry of LLC landlords, and flag those who repeatedly violate tenant and building protections. LLC ownership allows landlords to avoid accountability for code violations and tenant harassment, and incentivizes predatory behavior such as illegal evictions and cash for keys practices. Landlords like Vu and Fink should not be allowed to hide behind LLC's, and transparency would empower the housing department and city attorney to directly hold landlords accountable for their violations. Tenants and prospective tenants also deserve to know who their landlord is, and if their landlords own properties with egregious code violations. Transparency laws around property ownership have been passed in New York, Washington D.C., and Philadelphia.¹¹¹

Strengthen and Enforce the Tenant Anti-harassment Ordinance. In its current form, the Tenant Anti-harassment Ordinance fails to protect tenants as no funding exists to enforce the regulations, and places the onus on the tenant to pursue a case and pay for their own attorney fees. The city must create and fund a guaranteed right to counsel, and fund active enforcement to protect tenants.

¹¹¹ Baranetsky, D. Victoria. 2021. "Op-Ed: You should have the right to know your landlord's name." Los Angeles Times. <https://www.latimes.com/opinion/story/2021-02-24/rental-housing-shell-companies-landlords>

3. Invest in and improve the Los Angeles Housing Department's policies and practices to better serve tenants, enforce housing codes, and protect affordable housing stock.

The Los Angeles Housing Department is both underfunded and ill-equipped to protect tenants, regulate landlords, and effectively coordinate with other agencies such as the Department of Health or Building and Safety. LAHD needs significant investment that will allow them to effectively conduct timely inspections, enforce code and regulations, deploy an accessible functioning complaint system, and track affordable housing stock.

Invest in and Expand Code Enforcement and Inspection Programs. Since the start of the COVID-19 pandemic, the city has fallen woefully behind on inspections and code enforcement.¹¹² Many of the Vu and Fink buildings have not had SCEP inspections in the past year. In some cases, tenants had to wait for more than a year for LAHD to take action and schedule a General Manager's hearing. LAHD must expand and empower their code enforcement departments so that properties with violations can be followed-up on in a timely manner and SCEP inspections remain on schedule and can be easily rescheduled if necessary.

Furthermore, inspections should be done in an accessible language, so that tenants can communicate their issues clearly to the inspector. For increased transparency, the results of these reports should be given to the tenants within 1-2 weeks of the inspection.

Proactively enforce RSO regulations and investigate and regulate “cash for keys” practices. In this report, we talked to numerous tenants who were threatened with retaliation and pressured into taking “cash for keys.” While Los Angeles passed “cash for keys” regulations in 2017, this ordinance simply amounted to landlords being required to notify tenants of their right to refuse. No enforcement or active regulation of the ordinance exists. In particular, landlords like Vu and Fink are still able to threaten, harass, and deceive tenants with no accountability structures in place. The city must provide stronger protections to tenants against harassment and actively regulate cash for keys practices, in the form of more frequent RSO investigations, accessible and responsive complaint hotlines, and

¹¹² Wagner, David. 2021. “Tenants Feel Stranded As LA Cuts Back On Unpermitted Housing Enforcement During The Pandemic.” LAist. <https://laist.com/news/housing-homelessness/tenants-feel-stranded-as-la-cuts-back-on-unpermitted-housing-enforcement-during-the-pandemic>

adding RSO inspectors. RSO investigations need to consider a pattern of behavior among a landlord's various properties, instead of a building-by-building basis.

Coordinate with the Los Angeles Department of Building and Safety to enforce construction regulations, and levy fines and punishments against landlords who conduct illegal and unpermitted construction. Vu and Fink's practices of conducting illegal construction without the appropriate permits has endangered tenant lives and in several cases, made their homes uninhabitable. Vu was allowed to pull permits retroactively without inspections of past construction work, and pulled permits for the wrong type of building in order to bypass the required Tenant Habitability Plan.

Under the current system, LADBS will file an "Order to Comply" when illegal construction is found, but lacks the capacity to properly enforce these measures. LAHD will close cases and delay General Manager's hearings to allow Vu and Fink to file for permits and accept these permits when neither LAHD and LADBS has come in person to inspect past and ongoing construction work. This laissez-faire approach allows landlords to operate business as usual even if they have multiple building and safety violations, with no penalty.

On March 2, 2021, Los Angeles City Council acknowledged the inability of the city to halt unpermitted construction, approved an action for the Department of Building and Safety, along with the city attorney and city administrative officer to prepare a report to analyze the potential monetary penalties that could be levied against landlords who conduct illegal construction.¹¹³ This report must be expedited and released. LAHD must work with LADBS to investigate and enforce issues of illegal construction and ensure that Tenant Habitability Plan requirements are properly followed.

Increase targeted enforcement of health violations in multifamily housing. In numerous cases when tenants complained about mold, vermin, or flooding to LAHD, the inspector told the tenant to file a complaint to the Department of Public Health. DPH in turn, was largely unresponsive and has historically overlooked and under enforced multifamily housing units and health issues within those buildings.

¹¹³ Los Angeles City Council File No. 17-0226-S1. https://clkrep.lacity.org/online/docs/2017/17-0226-S1_rpt_PLUM_02-04-21.pdf

Rather than continuing to ask tenants to do more work, LAHD must expand their efforts to address health issues caused by the landlord, and effectively coordinate with the Department of Public Health so that these violations can be addressed.

Create a community panel of residents, tenants, and housing advocates that provide oversight to LAHD. Agencies like LAHD have little to no oversight from those who they claim to serve; the residents and tenants. The city should establish a commission of tenants and housing advocates to ensure that city agencies are responding adequately to the needs of tenants and taking action against abusive landlords. This commission would be tasked with monitoring the department's ability to enforce housing code, assessing the accessibility and effectiveness of complaint systems and inspection programs, and reporting the results back to the community.

Create an accessible and equitable complaint system for housing and habitability issues. The city must provide information to all tenants on how to file complaints and the complaint process in accessible languages. In particular, LAHD lacks adequate Asian language resources like Mandarin, Cantonese, Vietnamese, and Khmer, which are the primary languages for the majority of tenants in the Chinatown area. Furthermore, the complaint process is confusing and splintered amongst departments. For example, SCEP complaints must be filed differently than RSO complaints, and complaints regarding mold or pests are handled by the Health Department. The complaint system needs to be streamlined and accessible for all tenants.

The city has a responsibility to address slumlord tactics and their efforts to destroy safe and affordable housing to generate profit. In the midst of a housing crisis, the city must do more to protect its most vulnerable residents. No one should have to endure abuse, targeted harassment, and subpar housing just to be able to remain in the home they have built over decades.



Download the report at:
https://www.ccedla.org/vu_fink_report.html