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David W. Slayton,
Executive Officer/Clerk of Court,
By D. Simon, Deputy Clerk

8 Attorneys for PEOPLE OF THE STATE OF
CALIFORNIA and COUNTY OF
9 LOS ANGELES

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, NORTH DISTRICT**

PEOPLE OF THE STATE OF CALIFORNIA;
and COUNTY OF LOS ANGELES,

Plaintiffs,

v.

ROBERT O. WHITFIELD III, an individual;
ERIC D. HAUCK, individually and as trustee
of the Acton Holding Trust; DOES 1
THROUGH 10, inclusive,

Defendants.

CASE NO. 26AVCV00217

**COMPLAINT FOR INJUNCTIVE AND
OTHER EQUITABLE RELIEF TO
ABATE PUBLIC NUISANCE AND FOR
CIVIL PENALTIES**

[Unlimited Action]

1 Plaintiffs, the PEOPLE OF THE STATE OF CALIFORNIA and COUNTY OF
2 LOS ANGELES (collectively, "Plaintiffs"), and allege as follows:

3 **INTRODUCTION**

4 1. Plaintiffs bring this action to abate, enjoin, and prevent unlawful use and operation
5 of a mobilehome park and substandard conditions on that certain real property commonly known
6 as 3740 Smith Avenue, in the unincorporated community of Acton, county of Los Angeles, state
7 of California 93510, and more particularly described by Los Angeles County assessor's parcel
8 number 3208-026-048 (hereinafter referred as "Property"), which pose a serious threat to public
9 health, safety, and welfare and create a public nuisance.

10 **PARTIES**

11 2. Plaintiffs, the PEOPLE OF THE STATE OF CALIFORNIA ("People") are hereby
12 represented by the Office of the Los Angeles County Counsel, which prosecutes this action on
13 their behalf pursuant to California Health and Safety Code (Health & Saf. Code) section 18402
14 and California Code of Civil Procedure (Code of Civ. Proc.) section 731.

15 3. At all times material to this action, COUNTY OF LOS ANGELES ("County") was
16 and now is a political subdivision of the state of California and a chartered county organized and
17 existing under the constitution and laws of the state of California. The County is empowered, by
18 the constitution and the laws of the State of California, to enact ordinances and to file suit on its
19 behalf.

20 4. At all times material to this action, defendant ROBERT O. WHITFIELD III
21 ("Whitfield") was a person with ownership interest in the Property, a person who managed and/or
22 exercised control over the Property, and who through his acts and/or omissions caused the
23 Plaintiffs' injuries complained herein.

24 5. At all times material to this action, defendant ERIC D. HAUCK ("Hauck") was the
25 trustee of The Acton Holding Trust, the former owner of the Property, a person who managed and
26 exercised control over the Property, and who through his acts and/or omissions caused the
27 Plaintiffs' injuries complained herein.

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1 10. The Property is a 10-lot mobilehome park, which contains two substandard
2 mobilehomes and varying number of dilapidated recreational vehicles. It has no running water,
3 permitted electrical service, nor sewage disposal system. It is littered with junk and salvage,
4 inoperable vehicles, trash, debris, and infested with rodents. At any given time, approximately
5 ten (10) or more individuals occupy the Property.

6 11. The Property has a general reputation in the community and with the Los Angeles
7 County Sheriff's Department ("Sheriff's Department") as a place where criminal activities occur.
8 On an ongoing basis, between 2011 and present, the neighboring residents have repeatedly
9 complained to the County authorities about use and sale of illegal narcotics, loitering, drug
10 overdoses, disorderly conduct, fights, illegal disposal of sewage, and fire hazards on or next to the
11 Property.

12 **B. Ownership History**

13 12. On or about April 21, 2011, Defendant Hauck acquired the Property as the trustee
14 of The Acton Holding Trust from Bayview Loan Servicing, LLC. On April 26, 2011, Defendant
15 Whitfield, on behalf of The Whitfield Family Trust, recorded a Deed of Trust with assignment of
16 rents and power of sale against the Property to secure a one hundred thousand dollars (\$100,000)
17 loan provided to Defendant Hauck to acquire the Property.

18 13. On or about May 31, 2024, Defendant Hauck quitclaimed the Property to
19 Defendant Whitfield, as his sole and separate property. From on or about that date, Defendant
20 Whitfield represented himself to the County authorities as the owner of the Property.

21 **C. Enforcement History**

22 **Prior Judgment Against Cactus Creek Mobilehome Park**

23 14. Sometime in the spring of 2011, County Department of Regional Planning
24 ("Planning Department") received a public complaint about existence of an unpermitted
25 mobilehome park on the Property.

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1 15. On or about June 6, 2011, a zoning enforcement officer from the Planning
2 Department inspected the Property and observed multiple mobilehomes on the premises, including
3 substandard living conditions. Based on these observations, the officer issued a notice of violation
4 to Defendant Hauck for unlawful operation of a mobilehome park without a conditional use permit
5 ("CUP"), as required by tile 22 of the Los Angeles County Code ("Zoning Code"). The notice of
6 violation directed Defendant Hauck to abate the violation within thirty (30) days.

7 16. Between October 6, 2011, and January 5, 2012, the zoning enforcement officer
8 conducted several re-inspections of the Property and confirmed that the mobilehome park was still
9 being maintained and operated on the Property.

10 17. On or about January 25, 2012, due to the Defendant Hauck's failure to comply, the
11 Planning Department issued a final zoning enforcement order directing Defendant Hauck to either
12 apply for a mobilehome park CUP or discontinue the unlawful use of the Property, and pay a
13 noncompliance fee within fifteen (15) days.

14 18. Between April 2, 2012, and September 25, 2014, the zoning enforcement officer
15 conducted multiple additional re-inspections of the Property and confirmed that the mobilehome
16 park continued to be maintained on the premises.

17 19. On or about July 20, 2015, County filed a nuisance abatement action in the
18 Los Angeles Superior Court, entitled *County of Los Angeles v. Eric D. Hauck* (LASC Case
19 No. MC025620). On January 25, 2016, the Court entered a judgment in the County's favor and
20 issued a permanent injunction ordering Defendant Hauck to either close Cactus Creek
21 Mobilehome Park within 90 days or apply for and secure a CUP to continue operating the
22 mobilehome park. (See attached Exhibit 1 – hereinafter referred to as the "Judgment".) Despite
23 being personally served with a copy of the Judgment and repeatedly warned of his obligations to
24 comply with it, Defendant Hauck failed to correct the existing code violations on the Property and
25 pay the outstanding civil penalties and fines.

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1 **The County's Second Administrative Enforcement Action**

2 20. For the past ten (10) years, between January 25, 2016, and present, County
3 authorities, including, but not limited to, the Planning Department, Sheriff's Department,
4 Department of Public Health, and Department of Public Works, spent hundreds of hours
5 inspecting the Property and attempting to compel Defendants to comply with the requirements of
6 the Los Angeles County Code (County Code). These attempts to secure compliance were
7 unsuccessful, and Cactus Creek Mobile Home Park continues to operate and be maintained in
8 violation of the Los Angeles County Code and the State law.

9 21. Over the course of dozens of inspections of the Property during this time period,
10 the County authorities observed continued operation and occupancy of Cactus Creek Mobilehome
11 Park and deplorable living conditions on the Property; to wit, substandard mobilehomes and
12 dilapidated recreational vehicles, junk and salvage, inoperable vehicles, overgrown vegetation,
13 trash, debris, unpermitted and leaking cesspools, and unpermitted and unsafe electrical wiring and
14 plumbing installations. Junk and salvage generally consisted of, but were not limited to, the
15 following items: discarded wood, plastic, metal, cardboard and/or cloth products, discarded
16 bicycles, trash bags, discarded mattresses, tires and/or rims, general household debris, discarded
17 clothing, discarded tarps, discarded children's toys, discarded furniture, discarded pallets, County
18 Public Works traffic delineators, street signs, plastic, rubber, wood and/or metal containers,
19 fifty five (55) gallon containers, five (5) gallon buckets, refrigerator, lengths of black tubing,
20 propane tanks, ladders, and other miscellaneous discarded items.

21 22. On or about November 7, 2024, County representatives from the Departments of
22 Regional Planning, Public Health, Public Works, and County Counsel held an office conference
23 with Defendant Whitfield and his representatives, Charlotte Dumas and Mark Moses, to discuss
24 unpermitted operation of Cactus Creek Mobilehome Park and substandard conditions on the
25 Property, including timelines for abating the violations.

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1 23. At the meeting, Defendant Whitfield was informed that there is no local permit for
2 the operation of a mobilehome park on the Property and that the Judgment required that a CUP be
3 either secured or that the park be closed in compliance with all applicable state and local laws
4 pertaining to the closure of a mobile home park. Defendant Whitfield was further informed that
5 the Property is in a state of disrepair and lacks basic utilities, such as electricity, water, and sewage
6 treatment system, and that those substandard conditions must be remedied immediately.

7 24. Defendant Whitfield informed the County representatives that none of the
8 occupants of Cactus Creek Mobilehome Park have a lease or agreement to reside on the Property.
9 All parties agreed that an onsite inspection will occur to note the current conditions of the
10 Property.

11 25. On November 18, 2024, the County and California Regional Water Quality Control
12 Board representatives inspected the Property in the presence of Defendant Whitfield. The
13 substandard conditions continued to be maintained on the premises, including, but not limited to,
14 lack of electric, water, and sewage disposal services, general unsightliness, junk and salvage,
15 debris, trash, and dilapidated mobilehomes, recreational vehicles, and inoperable vehicles.

16 26. On January 25, 2025, Planning Department issued a Notice of Violation to
17 Defendant Whitfield informing him that he continues to maintain an unpermitted mobilehome
18 park on the Property and ordered him to bring the Property into compliance with the County Code
19 sections 22.02.030(B), 22.18.020, 22.18.030(A), 22.18.030(B), and 22.18.030(C)(1)) within
20 thirty (30) days from the date of issuance of the notice.

21 27. Defendants failed to respond to the Planning Department and abate the code
22 violations on the Property. As a result, on July 3, 2025, Planning Department issued the Final
23 Zoning Enforcement Order and imposed a noncompliance fee against Defendant Whitfield. The
24 order was posted on the Property that same day.

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1 **Enforcement Action by the California Department of Housing and Community Development**

2 28. Mobilehome parks, such as Cactus Creek Mobilehome Park, are generally
3 governed by Health & Saf. Code section 18200, et seq. (hereinafter referred to as the
4 "Mobilehome Parks Act") and the implementing regulations under California Code of Regulations
5 (Cal. Code of Regs.) title 25, division 1, chapter 2.

6 29. The California Department of Housing and Community Development (hereinafter
7 referred to as "HCD") oversees the construction, safety, maintenance, occupancy, use, design,
8 sanitation standards, and utility systems of mobilehome parks.

9 30. On or about June 27, 2025, HCD inspected the Property, observed the following
10 substandard conditions and health and safety concerns on the Property, and made the following
11 findings: (a) the general park areas and individual lots are without electrical service and open
12 exposed wiring (Health & Saf. Code section 18420(b)(1); Cal. Code of Regs., title 25,
13 sections 1102(a), 1130, 1140, 1188,1605(a)(6)(c)(d)(1)(i), and 1610); (b) the general park areas
14 and individual lots are without water service (Health & Saf. Code section 18420(b)(1); Cal. Code
15 of Regs., title 25, sections 1102(a), 1240, 1276(b), and 1605(a)(3), 1606(a)(3), 1607(a)(4)(e)(1),
16 and 1610); (c) the park has an illegal cesspool and no legal operational means of disposing of
17 human waste (Health & Saf. Code sections 18420(b)(1), 18871.4, and 18554; Cal. Code of Regs.,
18 title 25, sections 1102(a), 1248, 1276(b), and 1605(a)(7), and 1610); and (d) there is parkwide
19 rubbish and debris and abandoned non-operational vehicles that are blocking park egress (Health
20 & Saf. Code section 18420(b)(1); Cal. Code of Regs., title 25 sections 1102(a), 1120,
21 1605(c)(j)(k), 1608(a)(3), and 1610).

22 31. The HCD further found that these substandard and nuisance conditions on the
23 Property constitute an imminent hazard representing an immediate risk to life, health, and safety.
24 As a result, HCD issued a Notice of Violation and ordered Defendant Whitfield to correct all of
25 the substandard conditions and outstanding code violations on the Property within five (5) days.

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1 32. On July 7, 2025, HCD reinspected the Property and observed no change in the
2 substandard conditions on the Property. Consequently, HCD issued a Final Notice of Violation to
3 Defendant Whitfield requiring him to correct substandard conditions and code violations on the
4 Property.

5 33. On July 14, 2025, HCD conducted another inspection and observed that the
6 conditions on the Property remained unchanged. The HCD then issued a Notice of Intent to
7 Suspend the Permit to Operate Cactus Creek Mobilehome Park to Defendant Whitfield and posted
8 the notice on the front fence of the Property.

9 34. On July 21, 2025, due to Defendant Whitfield's failure to correct the code
10 violations on the Property, HCD suspended the State permit for operation of the mobilehome park
11 on the Property. The Notice of Suspension was posted on the front fence of the Property on the
12 same day.

13 35. On July 28, 2025, HCD issued a Notice of Abatement of All Public Nuisances and
14 Outstanding Violations and Order to Abate All Public Nuisances and Outstanding Violations
15 (hereinafter referred to as the "Notice to Abate") to Defendant Whitfield pursuant to Health and
16 Saf. Code sections 18401, 18402, 18403, and 18404, and Cal. Code of Regs., title 25,
17 sections 1610 and 1617. Defendant Whitfield was again ordered to correct all of the outstanding
18 substandard conditions and code violations within five (5) days; to wit, restore electrical and water
19 service to the mobilhome park, remove illegal cesspool(s) and provide legal, operational means of
20 disposing human waste, and remove all rubbish, debris, and inoperable vehicles. The Notice Abate
21 was posted on the Property on the same day.

22 36. On August 5, 2025, HCD reinspected the Property and observed that Defendant
23 Whitfield failed to comply with the Notice to Abate.

24 37. As a result, on August 6, 2025, in accordance with Health and Saf. Code
25 section 18402, the HCD referred the case to the County Counsel's Office for civil prosecution.

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1 **Enforcement Action by the United States Environmental Protection Agency**

2 38. On February 15, 2023, the United States Environmental Protection
3 Agency ("US EPA") filed an administrative complaint against Defendant Hauck for allowing
4 operation and use of two unpermitted large-capacity cesspools on the Property, in violation of the
5 Safe Drinking Water Act, Title 42 of the United States Code sections 300h through 300h-8 and the
6 implementing regulations set forth in title 40 of the Federal Code of Regulations section 144, et
7 seq. The complaint also sought imposition of civil penalties against the Defendant for violations of
8 the Safe Drinking Water Act.

9 39. In promulgating the requirements relating to cesspools, US EPA found that large
10 capacity cesspools have a high potential to contaminate underground sources of drinking water
11 and threaten human health because (1) sanitary waste entering large capacity cesspools can
12 percolate out of the bottom of wells to shallow groundwater sources of drinking water;
13 (2) wastewater from large capacity cesspools frequently exceeds drinking water health standards
14 for nitrates, total suspended solids, and coliform bacteria and may contain other contaminants of
15 concern such as phosphates, chlorides, grease, viruses, and chemicals used to clean cesspools (e.g.,
16 trichloroethane and methylene chloride); and (3) pathogens in untreated sanitary waste released
17 from large capacity cesspools could pose an acute health risk (e.g., a person could become ill by
18 drinking from an affected water supply).

19 40. Defendant Hauck failed to respond to the US EPA's administrative complaint
20 and/or remove the illegal cesspools, and as a result, on April 24, 2024, a US EPA's regional
21 judicial officer, issued an order finding Defendant Hauck liable for violation of section 1423(c) of
22 the Safe Drinking Water Act, Title 42 United States Code section 300h-2(c), for violating the
23 regulatory prohibition on large capacity cesspools. As of the that date, Defendants took no steps to
24 comply with the order and abate the violations.

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1 **FIRST CAUSE OF ACTION**

2 **(Violation of County Code sections 22.02.030(B) and 22.242.020(A) and (B))**

3 **(By Plaintiff County Against all Defendants and Does 1-10)**

4 41. County incorporates by reference the above-stated allegations of paragraphs 1
5 through 40 in this First Cause of Action as though fully set forth herein.

6 42. Defendants and Does 1-10 have violated County Code sections 22.02.030(B)
7 and 22.242.020(A) and (B) by maintaining and using the Property as a mobilehome park, as that
8 term is defined in County Code section 22.14.130M, without previously obtaining a CUP from the
9 County planning authorities, as required by section 22.18.030(C). In so doing, Defendant and
10 Does 1-10 have used the Property in a manner not specifically permitted by the Zoning Code in
11 the R-A (residential-agricultural) zone.

12 43. Certain uses, such as a mobilehome park, as enumerated in sections 22.18.030(C),
13 are permitted in the R-A zone, subject to prior review and approval by the Planning Department,
14 its staff, officers, director and/or commission. The Defendants' current use of the Property is not
15 permitted by right and has not been previously approved by the County's planning authorities.

16 44. County is informed and believes, and based thereon alleges, that Defendants and
17 Does 1-10 act at present in violation of County Code sections 22.02.030(B) and 22.242.020(A)
18 and (B), and will continue to do so, unless enjoined by this Court.

19 **SECOND CAUSE OF ACTION**

20 **(Violation of County Code Section 1.23.010, et seq.)**

21 **(By Plaintiff County Against all Defendants and Does 1-10)**

22 45. The County incorporates by reference paragraphs 1 through 44 of this complaint in
23 this Second Cause of Action as though fully set forth herein.

24 46. Chapter 1.23 of the County Code provides for the abatement of public nuisances on
25 properties in the unincorporated areas of Los Angeles County.

26 47. Under County Code section 1.23.040, "[a]ny condition on a property that is
27 maintained in violation of any provision of Titles 7 through 32 of this code shall be deemed
28 unlawful and a public nuisance and may be abated as such."

1 48. Further, "[n]o person shall cause, maintain, or permit to be caused or maintained a
2 public nuisance, as defined in this chapter, on any property, and every day such public nuisance
3 continues shall be regarded as a new and separate violation." (County Code section 1.23.050.)

4 49. County Code section 1.23.060 authorizes the County Counsel to commence civil
5 action to abate or enjoin any public nuisance.

6 50. Any person who causes, maintains, or permits a public nuisance is liable for civil
7 penalties of one thousand dollars (\$1,000), where each day that the person caused, maintained, or
8 permitted a public nuisance constitutes a separate violation. (County Code section 1.23.090.)

9 51. In abating a public nuisance, the County is also entitled to all costs incurred,
10 including, but not limited to inspection costs, investigation costs, enforcement costs, and attorney's
11 fees and costs, as provided by County Code sections 1.23.070 and 1.23.080.

12 52. As detailed herein, since approximately 2011, Defendants have caused, maintained,
13 or permitted conditions on the Property that violate County Code sections 22.02.030(B)
14 and 22.242.020(A) and (B); to wit, operation of an unpermitted and substandard mobilehome park.
15 The conditions on the Property thereby constitute public nuisances, which Defendants have
16 caused, permitted, or maintained in violation of County Code section 1.23.050.

17 53. Defendants will continue to cause the public nuisances and/or fail to abate the
18 nuisances unless enjoined by order of the Court. Due to the existence of the prohibited and
19 substandard conditions at the Property, the County is entitled to a temporary restraining order,
20 preliminary and permanent injunctions, and appointment of receiver as detailed herein, including,
21 but not limited, under Code of Civ. Proc. section 564(b)(9). Absent the relief requested, the
22 County and its residents will be irreparably injured and damaged in that the public nuisances
23 detailed herein threaten the public health, safety, and general welfare and will continue.

24 54. Defendants are also liable for civil penalties of one thousand dollars (\$1,000) for
25 each day that they have caused, maintained, or permitted the public nuisances.

26 55. The County is further entitled to all costs incurred in bringing this action, including
27 but not limited to inspection costs, investigation costs, enforcement costs, and attorney's fees and
28 costs.

THIRD CAUSE OF ACTION

(Violation of the Mobilehome Parks Act (Health & Saf. Code section 18200, et seq.)

(By Plaintiff the People Against all Defendants and Does 1-10)

56. The People incorporate by reference the above-stated allegations of paragraphs 1 through 55 into this Third Cause of Action as though fully set forth herein.

57. Defendants' failure to comply with the HCD's notices of violation, including July 28, 2025, Notice to Abate (within the specified time and as directed) constitutes a willful violation of the Mobilehome Parks Act

58. Defendants' willful violation of the Mobilehome Parks Act subjects them each to liability for a civil penalty of five hundred dollars (\$500) for each violation or for each day of a continuing violation pursuant to Health & Saf. Code section 18700.

59. Defendants have each maintained outstanding violations of the Mobilehome Parks Act since at least June 27, 2025, through and including the date of this filing.

60. Health & Saf. Code section 18250 states, "...residents of mobilehome parks are entitled to live in conditions which assure their health, safety, general welfare, and a decent living environment..."[Omissions Added]. Defendants' willful violations and failure to abate the unsafe conditions of the Mobilehome Park, are depriving the residents of the Mobilehome Park of their right to live in a safe and healthy living environment.

61. People are informed and believe, and based thereon alleges, that Defendants and Does 1-10 act at present in violation of California Health & Saf. Code section 18402, and the specific provisions enumerated in paragraph 30 of this complaint, and will continue to do so, unless enjoined by this Court.

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1 **FOURTH CAUSE OF ACTION**

2 **(Violation of the Public Nuisance Law (Code Civ. Proc. sections 731; Civil Code**
3 **section 3479, et seq.)**

4 **(By Plaintiff the People Against All Defendants and Does 1-10)**

5 62. The People incorporate by reference paragraphs 1 through 61 of this complaint into
6 this Fourth Cause of Action as though fully set forth herein.

7 63. Under Civil Code (Civ. Code) section 3479, a nuisance is "[a]nything which is
8 injurious to health, including, but not limited to, the illegal sale of controlled substances, or is
9 indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere
10 with the comfortable enjoyment of life or property, or unlawfully obstructs the free passage or use,
11 in the customary manner, of any navigable lake, or river, bay, stream, canal, or basin, or any
12 public park, square, street, or highway..."

13 64. Further, "[a] public nuisance is one which affects at the same time an entire
14 community or neighborhood, or any considerable number of persons, although the extent of the
15 annoyance or damage inflicted upon individuals may be unequal." (Civ. Code section 3480.) A
16 county counsel is authorized to bring an action in the name of the People to abate a public
17 nuisance. (Code Civ. Proc. section 731.)

18 65. At all times material to this action, the Property has been owned, operated,
19 occupied, used, and/or directly or indirectly permitted to be occupied and used, in such a manner
20 as to constitute a public nuisance in violation of Civ. Code sections 3479 and 3480.

21 66. The public nuisance on the Property includes, but is not limited to, (1) unpermitted
22 operation of a mobilehome park; (2) unpermitted, unsafe, and substandard buildings and
23 structures, which Defendants have unlawfully used, maintained, and/or rented to others;
24 (3) unpermitted electrical wiring connections; (4) lack of running water; (5) lack of permitted
25 sewage disposal system; (6) use, maintenance, and operation of illegal cesspools and discharge of
26 waste on and off the premises; (7) junk and salvage, trash, debris, abandoned inoperable vehicles,
27 and other refuse unlawfully stored on the Property; and (8) criminal activity, including use and
28 sale of narcotics, battery, disturbing the peace, loitering, and discharge of a firearm.

1 73. By operating a mobilehome park without the required local and State permits and
2 approvals, Defendants have maintained and continue to maintain the Property with conditions that
3 constitute violations of the State Housing Law, endanger public health and safety, and render the
4 Property, and the structures thereon, substandard. The conditions include, but are not limited to the
5 following:

- 6 a. Nuisances based on violations of Los Angeles County Health, Zoning, and
7 Building Codes outlined herein (Health & Saf. Code section 17920.3(c));
- 8 b. Inadequate sanitation due to:
 - 9 i. Lack of hot and cold running water to plumbing fixtures in a
10 dwelling unit (Health & Saf. Code section 17920.3(a)(5));
 - 11 ii. Lack of adequate heating (Health & Saf. Code
12 section 17920.3(a)(6));
 - 13 iii. Lack of required electrical lighting (Health & Saf. Code
14 section 17920.3(a)(10));
 - 15 iv. General dilapidation or improper maintenance (Health & Saf. Code
16 section 17920.3(a)(14)); and
 - 17 v. Lack of connection to required sewage disposal system (Health &
18 Saf. Code section 17920.3(a)(15)).
- 19 c. An accumulation of weeds, vegetation, dead organic matter, junk, debris,
20 garbage, combustible materials, and similar materials or conditions such
21 that they constitute fire, health, or safety hazards (Health & Saf. Code
22 section 17920.3(j));
- 23 d. Buildings or portions thereof that are unsafe due to inadequate maintenance
24 (Health & Saf. Code section 17920.3(k));
- 25 e. Buildings or portions thereof that are occupied for living, sleeping, cooking,
26 or dining purposes that were not designed or intended to be used for those
27 occupancies (Health & Saf. Code, section 17920.3(n)); and

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1 74. Health & Safety Code section 17980, subdivision (a) authorizes the County to
2 "institute any appropriate action or proceeding to prevent, restrain, correct, or abate" any
3 violations or conditions constituting a nuisance under the State Housing Law.

4 75. Health & Saf. Code section 17980.7, subdivision (c) authorizes the appointment of
5 a receiver to take full control of substandard properties for rehabilitation, repairs or demolition.

6 76. As a result of Defendants' failure to comply with the duly issued notices and orders,
7 the County is entitled to, and does request orders from the Court authorizing the appointment of a
8 receiver to take full and complete control of the Property and exercise the powers and duties listed
9 in Health & Saf. Code section 17980.7, subdivision (c)(4).

10 77. The County further seeks, that during the pendency of the receivership, Defendants
11 and their agents, representatives and all persons acting on their behalf should be enjoined from (1)
12 collecting rents from occupants, (2) interfering with the receiver, and/or (3) encumbering or
13 transferring the Property, pursuant to Health & Saf. Code section 17980.7, subdivision (c)(3).

14 78. Unless this Court appoints a receiver, Defendants will continue to maintain the
15 Property in a manner that constitutes a violation of the Health & Saf. Code and the County Code
16 as outlined herein.

17 79. The County further requests an order that recordation of an abstract of a judgment
18 in this case constitute a prior lien over any lien that may be held on the Property by any persons.

19 80. Due to Defendants' failure or refusal to comply with the County's duly issued
20 notices and orders to correct the conditions at the Property that substantially endanger the health
21 and safety of the neighboring community, the County is also entitled to all costs incurred,
22 including but not limited to inspection costs, investigation costs, enforcement costs, attorney fees
23 and costs, as provided by Health & Saf. Code section 17980.7 and County Code section 1.23.060.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against all named Defendants on all causes of action as follows:

1. That the Property and existing conditions thereon be declared in violation of the County Code sections 1.23.040 and 1.23.050, and 22.02.030(B) and 22.242.020(A) and (B); Health & Safety Code section 17910, et seq.; and Health & Safety Code section 18200, et seq.

2. That the Property be declared a continuing public nuisance pursuant to County Code sections 1.23.040 and 22.242.040, and Civ. Code sections 3479 and 3480.

3. That Defendants Whitfield and Hauck and their representatives, agents, servants, employees, partners, co-owners, and all acting in concert with, aiding and abetting, and/or participating with them, be temporarily and permanently enjoined and restrained, pursuant to County Code section 1.23.060; Code of Civ. Proc. section 526, et seq., and Health & Saf. Code section 18402, from owning, using, maintaining, leasing and/or occupying the Property as a mobilehome park and allowing substandard and nuisance conditions to exist thereon, and violating the applicable provisions of the County Code, the Mobilehome Parks Act, the State Housing Law, and Public Nuisance Law.

4. For an order appointing a receiver pursuant to Health & Saf. Code section 17980.7(c) and/or Code of Civ. Proc. section 564, subdivisions (b)(3) and (9) to abate all of the existing violations of the County Code, the State Housing Law, the Mobilehome Parks Act, and Public Nuisance Law on the Property and to insure that they do not reoccur in the future.

5. For an order closing the Property and removing any occupants until the code violations and public nuisance have been fully abated through repair, demolition, or otherwise.

6. For an award of attorney's fees pursuant to Health & Safety Code section 17980.7(c)(11) and/or County Code section 1.23.080.

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1 7. For an award all reasonable and actual costs incurred by the Los Angeles County
2 Department of Regional Planning and other County regulatory agencies including, but not limited
3 to, inspection costs, investigation costs, enforcement costs, attorney fees or costs, and all costs of
4 prosecution, as authorized by Health & Saf. Code section 17980.7(d)(1) and County Code
5 section 1.23.070.

6 8. For all fees imposed by the California Housing and Community Development
7 Department on Defendant Whitfield for outstanding violations of the Mobilehome Parks Act.

8 9. For civil penalties, pursuant to County Code section 1.23.090 and Health & Saf.
9 Code section 18700, for each day or part thereof during which the unlawful conditions alleged
10 herein existed on the Property.

11 10. For costs of suit; and

12 11. For such other relief as the Court deems just and proper.

13 DATED: February 10, 2026

Respectfully submitted,

DAWYN R. HARRISON
County Counsel

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By 
DUŠAN PAVLOVIĆ
Senior Deputy County Counsel

Attorneys for THE PEOPLE OF THE STATE OF
CALIFORNIA and COUNTY OF LOS ANGELES