

Re: July 6 2026. Unpermitted or non-compliant Chapter 11B common area alterations executed in 2014, 2023, and 2026. UPDATE REQUEST FOR FEDERAL INTERVENTION. TODAY'S HOUSING REQUESTS.

G Johnson <tainmount@sbcglobal.net>

Mon, Jul 6, 2026 at 11:04 PM

Reply-To: G Johnson <tainmount@sbcglobal.net>

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Note: This communication copy may occur under City NextRequest 26-12356.

Geary J. Johnson
1522 Hi Point St 9
Los Angeles, CA. 90035
323-807-3099

July 6 2026

Hi Point 1522 LLC
C/O 8885 Venice Blvd 205
Los Angeles. CA. 90035
Attention Thomas Khammar and Benjamin Renkainen

CRD case number _____
HUD number _____

BY US Mail, Facsimile, Email

RE: Notice of Formal Continued Request for Reasonable Accommodations and Under the Fair Housing Act and California FEHA

Unpermitted or non-compliant Chapter 11B common area alterations executed in 2014, 2023, and 2026.

"In June 2026, a total interior demolition, structural wall modification, plumbing, and electrical overhaul was performed on Unit [X] without required permits. Additionally, in June 2026, the building parking lot was unpermittedly resurfaced and restriped, intentionally omitting mandatory disabled parking spaces. In 2023, a building-wide common electrical intercom system was installed without electrical permits, reducing building safety and accessibility."

*Review by a senior inspector is requested.
This building receives government financial assistance.*

Dear **Hi Point 1522 LLC**

I am writing to formally request reasonable accommodations to ensure equal opportunity to use and enjoy my dwelling. These requests are made pursuant to the Federal Fair Housing Act (FHA) (42 U.S.C. §§ 3601-3619) and the California Fair Employment and Housing Act (FEHA) (Cal. Gov. Code §§ 12926, 12927, 12955). [5]

As a tenant with a physical disability that limits my mobility, I require the following adjustments to my housing arrangement:

1. Reasonable Accommodation: Assignment of the Parking Stall Closest to My Unit

- **The Request:** I request that an accessible parking stall located closest to the rear of the building which is the most accessible location, be permanently assigned to me.
- **Justification:** Per our active residential rental agreement, management retains the explicit authority to change parking stall assignments. Furthermore, the rental agreement provides no authority to impose parking fees or surcharges (whether for single, tandem, or any other layout). Parking has historically been included in the rent since 1972, and no tenant currently pays a fee. I asked you to verify this in December 2025, and there has been no response from you for five months so it is presumed to be correct that there is no separate fee, or any fee for parking, nor is any tenant paying \$150 per month for parking. Nor is there an authorized separate application for parking. Physical evidence proves there are unassigned parking stalls. Physical evidence proves there are quest parking stalls.
- **Feasibility:** The property currently has 27 stalls for 18 residents, but about 10 are currently vacant stalls (including three tandem stalls) including the fact five tenants do not own cars at all. Granting this request involves a simple administrative reassignment of an unoccupied space, posing zero financial or administrative burden to operations. Under HUD and [California Civil Rights Department](#) guidelines, a housing provider cannot impose a fee (such as the unwritten \$50 or \$150 fee mentioned verbally) as a condition for granting a reasonable parking accommodation. [6, 7, 8, 9]

2. Reasonable Accommodation: Accessible Unit Door Peephole/Viewer

- **The Request:** I request that a secondary unit door peephole viewer be installed at an accessible wheelchair height.
- **Justification:** I note that in December 2025, management replaced my door viewer as part of standard, rent-inclusive maintenance at no separate charge. Because door maintenance is an established necessity provided under the lease, and because unit door viewer is a city accessibility building code requirement, adjusting the height of this mechanism to accommodate a disability must be handled without any extra charge or rental penalty.
- Under HUD and [California Civil Rights Department](#) guidelines, a housing provider cannot impose a fee as a condition for granting a reasonable housing accommodation.

3. Reasonable Accommodation: Accessible Intercom Unit Interface/Monitor Upgrade

- **The Request:** I request an upgrade or replacement of the old interior intercom monitor currently installed in my unit to ensure it is fully operational and accessible.
- **Justification:** Management recently replaced the outdoor community intercom infrastructure as part of routine property maintenance at no separate cost to the tenants. To ensure equal access to the building's security features, the corresponding indoor interface must also be made fully functional for my accessibility needs without an added monthly or activation fee or need for tenant to supply connecting equipment. Because an intercom system is an established accessible necessity provided under the lease, and because the intercom system is a city accessibility building code requirement, providing the interface mechanism to accommodate a disability must be handled without any extra charge or rental penalty.
- Under HUD and [California Civil Rights Department](#) guidelines, a housing provider cannot impose a fee as a condition for granting a reasonable housing accommodation.
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Legal Summary Regarding Fees

Under both federal and state civil rights laws, a housing provider is strictly prohibited from charging "accommodation fees," demanding specialized deposits, or increasing rent to grant a disability-related request. Charging a disabled tenant for parking or building infrastructure while non-disabled tenants receive those same amenities free of charge constitutes unlawful housing discrimination.

Additional notes

In 2014 you installed new parking lot building lights and installed a new parking lot gate. These are considered major alterations to the building. The owner applied to the City Capital Improvements program to be reimbursed for the repairs. Those repairs concern the same parking lot and the same intercom system that is still in place now, with the addition of the Akuvox system. My point is that the fee for parking and the fee alleged for the intercom interface for each unit, could possible fall under Capital Improvements. The point is that when the new intercom was installed in 2014, there as no additional charge to tenants. At that time the door pad key entry system you claimed was installed. Again you installed the Akuvox system in 2023 which requires an indoor monitor. There was no announced charge for the Akuvox and as far as I know the inside unit interface for the 2014 intercom system remained in place but not connected to Akuvox.

The Capital Improvements application in 2014-2015 included a new gate charge installation of \$12,450.00; Lights \$1920 and install key pads \$960.00 for use of the entire common area building and tenants. That resulted in tenants paying \$17.08 for five years, which amounted to IMO about 50% of the total amount claimed. I think this may be the only option for you to claim fees for door viewer, intercom interface, and parking will be to go thru the Capital Improvements city program. Rather than you receive over \$150 per month from each tenant, for example, the City could grant you \$17.08 per month from each tenant.

Please provide your written response to these requests within **five days**.

Thank you for your prompt attention to this matter and for helping ensure my housing remains safe and accessible.

Sincerely,

Geary J. Johnson

[1522 Hi Point St 9](#)

[Los Angeles, CA. 90035](#)

323-807-3099

Compliance Notes for City Code enforcement

Effective March 15, 2012, all newly constructed or altered commercial and public facilities in Los Angeles must comply with the federal **2010 ADA Standards for Accessible Design**. Additionally, all renovations are governed by the accessibility provisions in Chapter 11 of the **California Building Code (CBC)**.

Key requirements mandated for building permits filed on or after this date include:

- **Path of Travel:** Clear paths connecting to public sidewalks, transit stops, and parking, with alterations triggering upgrades to elements like primary entrances and restrooms. [1, 2]
- **Accessible Parking:** Designated spaces near entrances with compliant slope (<2%) and appropriate van-accessible aisle widths. [1, 2]

- **Interior Navigation:** Doors requiring a minimum 32-inch clear opening, hallways at least 36 inches wide, and wheelchair turning spaces. [1, 2]
- **Restrooms:** At least one accessible multi-user or single-user stall with specific grab bar heights (33 to 36 inches) and proper maneuvering clearance. [1, 2]
- **Communication & Safety:** Visual/audible fire alarms and Braille signage near doorways and elevators. [1, 2]

The **non-conforming status disappears for common areas whenever alterations are performed**. Under the **Los Angeles Building Code (LABC)** and CBC Chapter 11B, any physical alterations, modifications, or systems upgrades made to common areas from 2014 onward **must comply with modern accessibility standards for those specific elements**.

You said: Private residential 18 units built 1972. In 2014 property received major renovations demolition, electrical and plumbing to fifteen units, new intercom system common area and connected monitor to 15 units only, parking lot altered with installation of electric entry gate. There is also guest parking stalls in the parking lot. The parking lot was resurfaced and stall lines altered in June 2026. I am the tenant. However the city code enforcement said that the property owner has "non-conforming rights when it comes to ADA." I am concerned with ADA requirements but primarily Los Angeles Building code accessibility requirements for the 2014 forward alterations. The owner also installed again a new common area intercom system in 2023 but did not supply connecting monitors in the 18 units.

The City Code Enforcement officer is technically correct that the property owner holds "**non-conforming rights**" **regarding the federal ADA and California Building Code (CBC) Chapter 11A inside the apartment units**. Because the building was constructed in 1972, it predates federal ADA Title III (1990) and California's multifamily housing standards (1991). [1, 2]

However, **this non-conforming status disappears for common areas whenever alterations are performed**. Under the **Los Angeles Building Code (LABC)** and CBC Chapter 11B, any physical alterations, modifications, or systems upgrades made to common areas from 2014 onward **must comply with modern accessibility standards for those specific elements**.

The specific code violations and trigger requirements based on the history of this property are outlined below.

1. The Intercom System Upgrades (2014 and 2023)

When the landlord replaced the common area intercom system in 2014 and again in 2023, the code required the updated system to match modern accessibility standards. [1]

- **The 2014 Monitor Omission:** Providing connecting monitors to only 15 out of 18 units is a direct violation of equal access provisions. Even if the three excluded units were not physically renovated inside, a common building utility upgrade must serve all tenants equally.
- **The 2023 System Upgrade:** By installing a completely new common area entry system in 2023 without providing connecting monitors inside *any* of the 18 units, the landlord may have **decreased the existing level of building accessibility** for the 15 units that previously had them. The code strictly prohibits any alteration that reduces accessibility below what was previously provided. [1]
- **Technical Requirements:** The outdoor entry intercom panel must comply with **CBC Chapter 11B** reach-range specifications. The operable buttons or touchscreens must be located between **15 inches and 48 inches** above the finished floor, and the system must provide both visual and audible cues for communication.

2. Parking Lot Alterations & The Electric Entry Gate (2014)

When the parking lot layout was altered and an electric entry gate was installed in 2014, the scope of work triggered standard "**Path of Travel**" **upgrade mandates**. [1]

- **The Entry Gate:** If the electric entry gate requires an access card, key, or code panel, that mechanism must sit within the 15-to-48-inch reach range. Furthermore, if it blocks a pedestrian path, a separate, compliant accessible pedestrian gate must be provided.
- **Path of Travel Trigger:** Under **LABC Section 11B-202.4**, when an owner alters an area (like a parking lot), they are legally required to spend up to **20% of their construction budget** to upgrade the "path of

travel" leading to that altered area if it isn't already compliant. This means the 2014 parking work should have triggered retrofits to the walkways leading from the parking lot into the building entrances.

- Note: walkways were not retrofitted by the owner nor was it cited by the city at the time.

3. Parking Resurfacing and Restriping (June 2026)

Resurfacing a parking lot and altering stall lines is legally classified as an alteration, not routine maintenance.

- **The Accessible Stall Mandate:** For an 18-unit residential lot with guest parking, the restriping project in June 2026 **was legally required to include at least one fully compliant, van-accessible parking space.**
- **Technical Requirements:** The designated accessible stall must be a minimum of 9 feet wide (or 12 feet wide for a van) and paired with an **8-foot-wide painted load aisle**. The entire stall and loading area must feature a flat slope of **less than 2%** in all directions, include an upright "Minimum Fine \$250" sign, and have the pavement painted with the blue International Symbol of Accessibility. [1]

4. The 2014 Unit Renovations (15 Units)

Because the building is privately funded and built before 1991, the interior spaces of the apartments hold strict non-conforming status. [1, 2]

- **Inside the Units: CBC Chapter 11A** (which governs multifamily adaptability) and **Chapter 11B** (public access) **do not retroactively apply inside existing private apartments** during a standard layout renovation.
- **The Catch:** While the landlord did not have to make the inside of those 15 apartments wheelchair-accessible, the "Path of Travel" law dictates that the major cost of the demolition, plumbing, and electrical work inside those units **should have triggered a 20% budget allocation to fix common area access barriers**—such as building entrance steps, un-sloped walkways, or the common intercom system.

Note: No building entry accessible steps were built, and the common intercom system access was not installed to three units.

5. The 2026 Unpermitted Unit Demolition and Remodel

A complete structural, plumbing, and electrical demolition of an interior apartment unit strictly requires structural, electrical, and plumbing permits from LADBS. [1, 2, 3]

- **The Unpermitted Trigger:** Because this work was done in 2026, it is governed by the **2022 California Building Code (CBC)** and **2023 Los Angeles Building Code**.
- **Accessibility Enforcement:** While the inside of a 1972 unit remains privately non-conforming, performing a massive, unpermitted remodel gives the city the right to issue a **Notice to Comply** or a **Stop Work Order**. To legalize the unit, the landlord will be forced to pull retroactive permits. [1, 2]



Hidden Dangers of Buying Homes with Unpermitted ADUs in SoCal

Thinking of buying in Southern California? Learn the risks of unpermitted ADUs, including fines, insurance issue...

- **The 20% Path of Travel Penalty:** To clear a retroactive permit for a major unit remodel, LADBS will enforce **CBC Section 11B-202.4**. The landlord will be legally forced to calculate the valuation of that 2026 remodel and spend up to **20% of that cost to fix common area accessibility barriers**—including adding the missing accessible parking space and correcting the intercom system.
-

6. The 2023 Unpermitted Intercom System

Replacing a building-wide communication system requires an electrical permit in Los Angeles.

- **The Violation:** By doing this unpermitted, the landlord illegally stripped away the functional indoor intercom monitors that 15 units previously possessed. Under **CBC Section 11B-202.2.1**, *"An alteration shall not decrease or have the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction."*
- **The Consequence:** The landlord can be cited for an unpermitted electrical system and ordered to restore equivalent accessibility to the units.

Note: This communication copy may occur under City NextRequest 26-12356.

CAPRI MADDOX

GENERAL MANAGER

CLAUDIA LUNA

ASSISTANT GENERAL MANAGER

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KAREN BASS

MAYOR

The Housing Services Requested are Needed Today

References

CBC and Los Angeles Building Code sections. CBC 11A and 11B. CBC section 1102A.3. CBC section 11B-202.

Herein as told to city of los Angeles government employees: Alan Christensen, Mark E. Bridge, Vatche Kasumyan, Germain Mendoza, Steven Harrison, Councilmember Hernandez, Councilmember Nazarian, Bob Blumenfield, Councilmember Yaroslavsky, Councilmember Rodriguez, Councilmember Price, Councilmember Park, Councilmember Lee, Councilmember Jurado, Councilmember McOsker, Controller Mejia, Aram Avedisian, Eric Bane, Doran Bobadilla, Laura Zimmerman, Grant Woods, Sewada Zadoorian, Jason Wilson, Kelly Warner, Mark Wang, Fabian Gonzalez, Ramazanali Almasi, Kevin Brown, Councilmember Harris-Dawson, Councilmember Martinez, Rene Flores, Phillip Munguia. Mayor Karen Bass, Los Angeles City Council members

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Power Property Management Group staff includes: Brent
Parsons, Thomas Khammar, Jackie Gallardo, Jeanette Conway,
Alva Corodo, Fidel Medina, Joel Murrillo, Javier Guevarra, Liliano
Morales, Edi Hernandez, Justice Walker, Brian Vasquez

The new owner is Hi Point 1522 LLC, managed by Hi Point 1522 Managers LLC,
managed by Hi Point 1522 Managers LLC, managed by Hi Point 1522 Managers
Holdco LLC, managed by Todd Jacobs, associated with Hi Point 1522 TJ Entity LLC,
managed by Anthony Jaffe. The property management company for this site is Power
Property Management which is at the same address as the other 1522 Hi Point LLC
entities above. (Source: Secretary of State Business Entities)

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