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**Sent time:** 10/15/2020 10:22:01 AM  
**To:** elvia.garcia@lacity.org; michael.vando@lacity.org; mindy.nguyen@lacity.org; vince.bertoni@lacity.org  
**Cc:** Dan Wright <Dan@robertsilversteinlaw.com>; Esther Kornfeld <Esther@robertsilversteinlaw.com>; Robert Silverstein <Robert@robertsilversteinlaw.com>  
**Subject:** The Silverstein Law Firm | Follow-up to LADBS re California Public Records Act Requests re the Hollywood Center Project; Case Nos. ENV-2018-2116-EIR, CPC-2018-2114-DB-MCUP-SPR, CPC-2018-2115-DA, and VTT-82152 ; SCH 2018051002  
**Attachments:** 10-15-20 [SCAN] Follow-up to LADBS (Van Do) re clarification of 8-26-20 CPRA Request.PDF

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All: Please see attached. Please confirm receipt. Thank you.

Mr. Van Do: Please ensure all in this email are included in your responses to this request.

Ms. Nguyen: Please include the attached and all responses into the record for the above-referenced matter.

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# THE SILVERSTEIN LAW FIRM

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October 15, 2020

**VIA EMAIL [michael.vando@lacity.org](mailto:michael.vando@lacity.org)  
[elvia.garcia@lacity.org](mailto:elvia.garcia@lacity.org)**

Mr. Michael Van Do  
Office of the Custodian of Records  
Los Angeles Department of Building and Safety  
201 N. Figueroa Street  
Los Angeles, CA 90012

Re: Follow-up to August 26, 2020 California Public Records Act Requests re  
the Hollywood Center Project; Case Nos. ENV-2018-2116-EIR,  
CPC-2018-2114-DB-MCUP-SPR, CPC-2018-2115-DA, and  
VTT-82152; SCH 2018051002

Dear Mr. Van Do:

Please include this letter and your responses in the Hollywood Center running  
administrative record.

We request that the Hollywood Center Environmental Impact Report (“EIR”)  
process **not** be completed, and that no Final EIR be scheduled for certification, until the  
City has produced all of the documents requested herein, and we have had reasonable  
time to review them following complete production.

We are also renewing all of our requests to ensure that all responsive documents  
are produced by your department through the present.

Your September 18, 2020 letter’s projected response date of November 17, 2020  
to our August 26, 2020 Public Records Act requests is unacceptably late, and might result  
in the improper, effective denial of documents needed for the administrative record.

10-15-20 [SCAN] Follow-up to LADBS (Van Do) re.PDF

Also, any production for responsive documents need to be provided to us electronically as physical inspection, even if you produce the documents sooner, is not viable because of COVID-19.

We restate our definition of “Developer” which is already detailed and specific. We are not changing it.

“Developer” shall refer to any principal, owner, employee, agent, consultant or attorney representing the owners or applicants of the Hollywood Center project site, including but not limited to MCAF Vine LLC, 1750 North Vine LLC, 1749 North Vine Street LLC, 1770 Ivar LLC, 1733 North Argyle LLC, and 1720 North Vine LLC, and any of their members, partners, employees, agents, consultants and/or lobbyists, including but not limited to:

(a) Millennium Partners, Millennium Hollywood Partners, Argent Ventures, and all principals, officers, partners, members, employees, attorneys, agents and/or consultants of such firms, including but not limited to Christopher Jeffries, Philip Aarons, Mario Palumbo, Phillip Lovett, Michael Gargano.

(b) Platinum Advisors, LLC, and their officers, partners, members, employees, attorneys, agents and/or consultants, including but not limited to Darius Anderson, Tim Lynch, Martha Miller, Beau C. Biller, Marisol Lopez, Joseph Devine, Charles Fina, Nick Garcia, Brian Lungren, Danny Offer, Steven Wallauch, and Kelly Hitt.

(c) Marathon Communications, and their officers, partners, members, employees, attorneys, agents and/or consultants.

(d) Attorneys for MCAF Vine LLC and/or related entities noted above, including Millennium Partners, and including the law firm of Sheppard, Mullin, including but not limited to Jerold/Jerry Neuman, Alfred Fraijo and Jeremy Chan, the law firm of Cox, Castle & Nicholson, including but not limited to David Waite, Michael Zischke, and Alexander DeGood, the Liner Law Firm, the law firm of Mayer Brown, including but not limited to Edgar Khalatian and Jeremy Chan.

(e) All consultants for MCAF Vine LLC and/or related entities noted above, including Millennium Partners, and including but not limited to Group Delta and Michael Reader.

**LADBS stated of the following 4 requests:**

“LADBS has determined that this portion of the request is too broad. Please clarify the definition of the term “Developer” that you included in your August 25, 2020 letter. Your definition includes the names or titles of dozens of different entities, firms, and individuals, many of whom frequently engage and correspond with LADBS staff and have collectively been involved with hundreds of past and present development projects in the City. Therefore, your record requests that include the “Developer” definition – specifically Nos. 2, 10, and 26 which are not specifically tied to the Project – will generate a huge volume of responsive documents and are unduly burdensome and oppressive. (See Cal. First Amendment Coalition v. Superior Court (1998) 67 Cal.App.4th 159, 166.)

(2) All documents as of the date of this letter that are not currently in the Project’s running administrative record, from January 1, 2017 through the date of your compliance with this request, which refer or relate to the Developer (as defined above, but excluding only for this request subdivision (d) of the definition of Developer, unless such documents involving those attorneys or law firms also relate to the Project) **in connection with the Project**, including but not limited to any and all staff reports, including drafts and documents in “working files,” studies, photographs, memoranda and internal memoranda, agenda items, agenda statements, correspondence, emails, attachments to emails, texts, notes, photos, and audio and/or video recordings.

**We are clarifying/modifying this request as shown.**

(6) All documents from January 1, 2018 through the date of your compliance with this request which refer or relate to ~~Raymond Chan in any manner, including but not limited to~~ the FBI’s investigation of **Raymond Chan**him, or of “Individual 1” referred to in the FBI’s criminal indictment or other documents related to the pay-to-play investigation of LA City Hall, and further including but not limited to emails, attachments to emails, texts, notes, photos, and audio and/or video recordings, and including but not

limited to in connection with any and all filings and applications for the Project ~~and/or the Developer~~ of the original version of the Project, as approved by the LA City Council in July 2013.

**We are clarifying/modifying this request as shown.**

- (10) From January 1, 2018 through the date of your compliance with this request, all Public Records Act requests by any and all other persons and entities about the Project ~~or Developer~~, and the City's written determinations and responses thereto.

**We voluntarily delete "or Developer." As modified, this request is confined to the Project.**

- (26) All documents as of the date of this letter that are not currently in the Project's running administrative record, from January 1, 2018 through the date of your compliance with this request, which refer or relate to stopthemillenniumhollywood.com, Robert Silverstein, The Silverstein Law Firm, and/or George Abrahams, related to the Project ~~or Developer~~, and including but not limited to memoranda and internal memoranda, emails, attachments to emails, texts, notes, photos, and audio and/or video recordings.

**We voluntarily delete "or Developer." As modified, this request is confined to the Project.**

Thank you.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

Cc: Vince Bertoni, Planning Director (via email vince.bertoni@lacity.org)  
Mindy Nguyen, City Planner (via email mindy.nguyen@lacity.org)