

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT: Coalition on Homelessness
(AVISO AL DEMANDADO):

see attached

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

Ramona Mayon

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

San Francisco Superior Court
Civic Center Courthouse
400 McAllister Street, Room 103
San Francisco, CA 94102-4514

CASE NUMBER:
(Número del Caso):

CGC-25-629986

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

@ 1559 Sloat Blvd Suite D-175 San Francisco CA 94132

DATE:
(Fecha)

OCT 09 2025

Clerk, by
(Secretario)

Ramona Mayon
DAEJA ROGERS
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
4. ☐ by personal delivery on (date):

SHORT TITLE:

CASE NUMBER:

INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
 → If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

Jennifer Friedenbach as executive director of
Coalition on Homelessness;

Lawyers Committee Civil Rights San Francisco;

ACLU of Northern California;

Urban Alchemy;

Lena Miller as executive director of
Urban Alchemy

Page ____ of ____

Page 1 of 1

Ramona Mayon (*Pro Se*)
1559 Sloat Blvd. Suite B-Box 175
San Francisco, California 94132
ramonamayon@yahoo.com
telephone: 415-595-6308

FILED
Superior Court of California
County of San Francisco

OCT 09 2025

CLERK OF THE COURT

BY:  Deputy Clerk

**SUPERIOR COURT OF STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

RAMONA MAYON,

Plaintiff,

v.

**COALITION ON
HOMELESSNESS; JENNIFER
FRIEDENBACH as executive
director of COALITION ON
HOMELESSNESS; LAWYERS
COMMITTEE CIVIL RIGHTS
SAN FRANCISCO; ACLU OF
NORTHERN CALIFORNIA;
URBAN ALCHEMY; LENA
MILLER, as executive Director of
URBAN ALCHEMY; and
DOES 1-50**

Defendants

Case No. CGC-25-629986

COMPLAINT FOR DAMAGES:

**FRAUD
(Cal. Civ. Proc. Code CCP § 338(d));**

**RIGHT TO PUBLICITY
(Cal. Civ. Code CIV § 3344);**

**UNFAIR BUSINESS PRACTICES
(Bus. & Prof. Code BPC § 17200)**

**DEFAMATION/LIBEL
(Cal. Civ. Code CIV § 45);**

**INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS
(Cal. Civ. Code CIV § 1708);**

Date:

Time:

Dept:

DEMAND FOR JURY TRIAL

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2 To this Honorable Court,
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4 By taking Plaintiff's personal story and embedding a distorted version within their high-profile
5 litigation without her consent, the first four Defendants knowingly and intentionally created the
6 false public impression that Plaintiff is a supporter, beneficiary, or ideological ally of the
7 Coalition on Homelessness and its legal strategies. This false affiliation is highly offensive to
8 Plaintiff and has caused her significant reputational harm and emotional distress. It has
9 undermined her credibility with her own peers and constituents, who now mistakenly believe she
10 has aligned herself with an organization whose approaches she explicitly rejects. Defendant's
11 actions were not merely negligent but were done with a reckless disregard for the truth of
12 Plaintiff's actual beliefs and advocacy, and with the knowledge that such a false affiliation would
13 cause her. The harm that this instant case addresses was delivered by the last two defendants on
14 December 13, 2024 by way of defamation/ libel.
15

16 JURISDICTION AND VENUE

17 2. This Court has subject matter jurisdiction pursuant to California law, as the causes of action
18 arise under California statutes and common law. Personal jurisdiction is proper because
19 Defendants conduct substantial business in California and committed the acts alleged herein
20 within the state.
21

22 3. Venue is proper in San Francisco County under CCP §395 because the events giving rise to
23 this Complaint occurred in San Francisco.
24

25 PARTIES

26 4. Plaintiff RAMONA MAYON ("MAYON") is an individual residing in San Francisco County
27 and was, at all relevant times, engaged in advocacy for the rights of individuals who are vehicle
28 dwellers as a published author and a tenant union organizer.

5. Defendant JENNIFER FRIEDENBACH ("FRIEDENBACH") is Executive Director of the
Coalition on Homelessness, a private nonprofit engaged in advocacy around homelessness in San
Francisco. She also sits on the oversight committee of the funding source where the plaintiff
lived (and organized): Our City, Our Home (OCHO). She has been on it since 2020 and is
currently.

5. Defendant COALITION ON HOMELESSNESS ("COH") is a California nonprofit
corporation headquartered in San Francisco at 280 Turk St. San Francisco, CA 94102

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3 6. Defendant LAWYERS COMMITTEE FOR CIVIL RIGHTS SAN ("LCCRSF") is a local
4 nonprofit corporation that began the case Sept 7, 2022 — all references to legal counsel will
5 about the ACLU as they are the ones who took and, Sept 2025, settled the case. The address is
6 131 Steuart St. San Francisco, CA 94105.

7 7. Defendant AMERICAN CIVIL LIBERTIES UNION ("ACLU") of NORTHERN
8 CALIFORNIA is a national nonprofit corporation conducting substantial and continuous business
9 in California, including litigation + advocacy. Address is 39 Drumm St. San Francisco CA 94111

10 8. Defendant LENA MILLER ("MILLER") is founder and CEO of URBAN ALCHEMY, a
11 California nonprofit contracted by the City to operate certain residential and shelter facilities.
12 She also sat (2020-22) on the oversight committee of the funding source where the plaintiff lived
(and organized): Our City, Our Home (OCOH).

13 9. Defendant URBAN ALCHEMY ("UA") is a California nonprofit headquartered in San
14 Francisco providing contracted homeless shelter and service operations. Address 255 Golden
15 Gate Ave, San Francisco, CA 94105

16 10. DOES 1–50 are additional persons or entities whose identities are presently unknown but
17 who participated in the acts alleged herein.

18 STATEMENT OF CASE

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20 11. In late 2020, Plaintiff MAYON filed pro se litigation against the City and County of San
21 Francisco in State Court, challenging actions affecting the tent encampment she resided in for
22 three months during the pandemic, shortly after being widowed and losing her RV home of many
23 years. No written notice had been given, although verbal had been, to a single person, who spread
24 the word, which is why MAYON was able to stay in possession of her goods, in her car, and
25 filmed the entire "sweep". She went to court within five days, having written the motion for a
26 TRO (i.e. that all sweeps stop throughout the City while the COVID order was in place. Also
27 there was a request to show order as to why the City had not provided water and toilets to the
28 beach encampment of over thirty people who refused to move into the Moscone Center during a
raging, deadly pandemic.

12. During and after the 2020 pro se filing, MAYON's legal work, narrative, and court filings were publicly accessible and known personally to Defendants: COH and FRIEDENBACH.

13. In February 2021, Plaintiff authored a first-person narrative essay detailing her experiences as an RV dweller and her advocacy for safe, vehicle-based housing solutions. The essay specifically described her hunger strike as a form of protest to demand these rights and services, as well as the 2020 per se litigation she began against San Francisco's Dept of Homelessness ("the Dept.") which was published in the Street Sheet newspaper operated by Defendant COALITION ON HOMELESSNESS ("COH"). For this publication, Defendant COH paid Plaintiff MAYON \$60, establishing a limited contractual relationship. Through this transaction, Defendants FRIEDENBACH and the COH gained direct, firsthand knowledge of Plaintiff's accurate narrative, her advocacy focus, and her specific circumstances, as told in her own words.

14. February 2021: A staffer from a law firm associated with this case (i.e. LCCRSF), contacted Plaintiff MAYON to make a \$500 "private donation" towards repairs of her broken down RV. This established an initial, direct point of contact with the litigation side of the operation she didn't know she was going to be made part of a year-and-half later.

15. Summer 2022: Plaintiff MAYON received (but ignored) multiple texts/calls from a "legal-sounding" source asking about her experiences with encampment sweeps. It targeted outreach to gather testimonies or evidence specifically related to the lawsuit's subject matter.

16. August 9, 2022 Plaintiff MAYON was forced (under threat of her RV being seized and towed by SFPD) to move into the "safe parking program".

17. Despite this dual role of Defendant FRIEDENBACH — and her unique knowledge of the horrific conditions at the facility from Plaintiff's own public complaints in the media and grievance to the Homeless Oversight Commission and her 2024 pro se litigation — Defendant FRIEDENBACH never personally contacted Plaintiff MAYON. Instead, she engaged in a pattern of surveillance and management-through-proxy. Throughout Plaintiff's tenure at the facility, staff members of Defendant COH repeatedly appeared at her RV unannounced or contacted her through her email. These interactions were never to provide aid or investigate her well-being, but to monitor her advocacy and, upon information and belief, to co-opt her legitimate outrage for their own institutional purposes. This is evidenced by their visible enthusiasm whenever Plaintiff MAYON suggested disruptive protest tactics, such an occupation, as opposed to dead silence in addressing her core complaints about the Dept's malfeasance.

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3 18. This pattern demonstrates that the Coalition viewed Plaintiff not as a rights-bearing
4 individual to be helped, but as a character in a narrative they sought to control—a narrative they
5 distorted for their litigation in *Coalition on Homelessness v. City of San Francisco*, while
6 simultaneously failing to use their oversight power to alleviate the very real suffering that
7 narrative was based on.

8 **UNAUTHORIZED MISAPPROPRIATION, FRAUD, AND RIGHT TO PUBLICITY**

9 19. Defendants' FRIEDENBACH and COH's subsequent unauthorized use and deliberate
10 misrepresentation of Plaintiff MAYON's story in their litigation *Coalition for Homelessness v.*
11 *City and County of San Francisco* was therefore not a product of mere negligence or mistake. It
12 was a knowing and willful decision to disregard the true story they had previously paid to
13 publish, and to replace it with a falsified narrative that better served their litigation objectives.

14 20. On or about September 27, 2022, Defendants ACLU and LLCRSF assisted the Defendant
15 COH, under the direction of Defendant FRIEDENBACH, with the filing of said complaint that
16 knowingly and without Plaintiff MAYON's consent, did appropriate her personal story for use in
17 their litigation against the City and County of San Francisco.

18 21. These Defendants (COH, FRIEDENBACH, ACLU, and LLCRSF) deliberately distorted
19 Plaintiff MAYON's story, falsely alleging she had "lost everything" and received "No notice,
20 written or verbal" despite their knowledge—gained from the paid essay and public court
21 records—these assertions were materially false.

22 22. Plaintiff MAYON was identifiable in these filings through unique descriptive references and
23 a direct quote from a City official that was tied exclusively to her 2020 pro se litigation. She was
24 called an "unhoused person", as if that somehow disguised where the statement came from. It
25 shows the Defendants COH and ACLU and LLCRSF didn't just use her story; they distorted her
26 identity and beliefs to serve their own narrative.

27 23. Upon discovering the unauthorized use and subsequent misrepresentations approximately
28 three years ago, on Oct 8, 2022, Plaintiff MAYON, an impoverished individual (at the time on
hospice) disabled on SSI, was intimidated by the prospect of engaging in legal warfare with the
ACLU and LLCRSF, who are large, well-funded organizations with immense legal resources.
MAYON reasonably feared that any challenge would be met with overwhelming legal force and
potentially used to further discredit her.

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3 24. The recent settlement of the underlying case, finalized on or about Sept 7, 2025, served as
4 the definitive event demonstrating that the false narratives about MAYON had been permanently
5 embedded into the legal record without correction. This settlement, based in part on the
6 mischaracterization of MAYON's story, crystallized the harm and eliminated any hope that the
7 record would be set right without judicial intervention. It constituted a final, public republication
8 of the falsehoods.

9 25. Plaintiff MAYON suffered the violation of her proprietary interest in her own legal work.
10 The right to petition does not include a right to commit fraud or steal intellectual property. Their
11 use was for litigation advantage, not core political speech. Furthermore, knowingly false speech
12 is not protected by the First Amendment. This misappropriation was not for core political speech
13 but for tactical litigation advantage, intended to secure favorable rulings and, ultimately, attorney
14 fees.

15 **INTERLOCKING RELATIONSHIPS AND CONFLICT OF INTEREST**

16 26. At all relevant times, and to this current day, Defendant FRIEDENBACH (Executive
17 Director of COH) and from 2020 until April of 2022 Defendant MILLER (CEO of Defendant
18 URBAN ALCHEMY) served together on the "Our City Our Home" (OCOH) Oversight
19 Committee, a public body that influences the allocation of hundreds of millions of dollars in
20 funding for homelessness services, including where Plaintiff MAYON resided from Aug 9, 2022
21 until March 3, 2025: the "safe parking program" called the "Vehicle Triage Center" located at
22 500 Hunters Point Expressway in the Bayview neighborhood of San Francisco.

23 27. Upon information and belief, shortly before filing the underlying 2022 litigation that
24 Plaintiff MAYON objects to being unscrupulously added to as paragraph #227, the OCOH
25 committee awarded a \$250,000 sole-source grant to Defendant FRIEDENBACH's organization,
26 Defendant COH. Likewise, Defendant MILLER also had a financial interest in the millions in
27 dollars in funding being awarded to her own company, Defendant URBAN ALCHEMY. These
28 two Defendants sat on the same sub-committee that oversaw "shelters and Navigation Centers",
therefore the funding (as well as the conditions) of the "safe parking program", where Plaintiff
MAYON resided, was under their purview. This created a direct financial conflict of interest
because Defendant FRIEDENBACH used OCOH funds to increase the prestige and litigational
footprint of Defendant COH by suing the City and that litigation contained Plaintiff MAYON's
usurped and now altered legal narrative, bent to serve the Defendant FRIENDBACH's agenda.

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3 28. This grant, occurring contemporaneously with the development of the legal strategy for the
4 Underlying Litigation, created a direct and substantial financial incentive for Defendants
5 FRIEDENBACH and COH to file and aggressively pursue the lawsuit. The success of the
6 litigation would directly justify the continued funding of their organization. This financial
7 conflict of interest provides critical context for the Defendants' subsequent conduct. The
8 misappropriation and deliberate misrepresentation of Plaintiff MAYON's story was not
9 accidental; they were tactical acts taken to bolster a high-stakes lawsuit that served the direct
10 financial and institutional interests of Defendants FRIEDENBACH and COH.

11 28. Defendant FRIEDENBACH, while acting in a fiduciary capacity as a member of the public
12 OCOH Oversight Committee, engaged in self-dealing by facilitating a grant to her own
13 organization and then using the litigation that grant supported, to misappropriate Plaintiff's story
14 while she, the Plaintiff, was suffering at the very location that the sub-committee was empowered
15 to observe and control. This constitutes a breach of her fiduciary duty to the public and
16 demonstrates a pattern of exploiting her position for institutional gain, with a callous disregard
17 for the rights of vulnerable individuals like Plaintiff MAYON.

18 29. Further demonstrating the interconnected nature of these Defendants, in April 2022, right as
19 Defendant MILLER stepped down from the OCOH oversight committee (she served a full
20 two-year term) she hired, the City's former Director of Homelessness, whose declaration was
21 misappropriated by Defendants COH, FRIEDENBACH, ACLU and LCCRSF, in their lawsuit
22 against the City, was hired by Defendant URBAN ALCHEMY as the executive in charge of their
23 growth nationwide.

24 30. The sworn statement in Plaintiff MAYON's pro se lawsuit in 2020 which was later
25 misappropriated and mischaracterized by Defendants ACLU and JENNIFER FRIEDENBACH,
26 originated from Jeff Kowisky, then Director of San Francisco Department of Homelessness and
27 Supportive Housing, but by April 2022, he had been hired as "Growth Director" at Urban
28 Alchemy (so that would be without the usual one-year waiting period required of city
employees).

31. Shortly after making this statement, KOWISKY left his public office and assumed a
position as "Growth Director" at URBAN ALCHEMY.

32. In August 2022, MAYON was placed in Urban Alchemy's "safe parking" facility. During
her tenancy, she was subject to a pattern of retaliation and hostile environment by Defendant
URBAN ALCHEMY, partially documented in a HUD complaint.

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3 33. Key is that there was an active knowledge on part of all the Defendants of Plaintiff
4 MAYON 's hostile living situation, due to significant media coverage portraying Plaintiff as a
5 tenant union organizer advocating for better conditions. Despite this knowledge, and while
6 serving in an oversight capacity for the facility's funding, Defendant FRIEDENBACH, through
7 her high-profile litigation, continued to misuse Plaintiff MAYON's story and falsely portray her
8 legal experience.

9 **The Retaliatory Harm: Defamation/ Libel**

10 34. During her tenancy, Plaintiff MAYON organized a tenants' union in 2023 and then in 2024,
11 she filed (another) pro se lawsuit over the foul conditions.

12 35. By the fall of 2024, HUD had filed several complaints, including one for MAYON (filed
13 Oct 1, 2024) alleging she was treated in a retaliatory manner after reporting to them with a film
14 supporting the efforts of another "safe parking program" resident, a woman in a wheelchair
15 attempting to get ramps to the communal areas, like picnic tables and the dog run, as well as a
16 safe ADA-compliant shower. That case number is attached as an exhibit. MAYON is informed
17 and believes there were other cases that HUD was investigating and this was another reason that
18 put pressure on the Dept, leading to the closure of the "safe parking program".

19 36. On or about December 13, 2024, following positive media attention by way of two first
20 place awards December 4, 2024 from the San Francisco Press Club for the journalist who wrote a
21 (digital) investigative reporting series on the "safe parking program" as well as a (digital) profile
22 featuring Plaintiff MAYON's lifestyle as an ethnic gypsy Traveller and her books about it, an
23 "anonymous" URBAN ALCHEMY staffer made false and defamatory statements about Plaintiff
24 MAYON and the other union members (all named) to the SF Standard newspaper (most popular
25 progressive newspaper in San Francisco), calling them "leeches," "squatters," and "entitled
26 troublemakers."

27 37. This defamatory article was published as a direct act of retaliation, intended to discredit
28 Plaintiff MAYON and chill her protected speech. These statements are defamatory per se. As a
direct and proximate result of Defendant URBANY ALCHEMY's retaliatory conduct, Plaintiff
MAYON has suffered significant harm, including damage to her reputation, severe emotional
distress, and increased anxiety and fear. The retaliatory libel was specifically designed to
undermine her credibility as an advocate and organizer, and cause her reputation harm.

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3 38. Also telling of the pressure Plaintiff MAYON has been forced to endure due to her
4 advocacy (and legal) work exposing the deplorable conditions at the “safe parking program”, on
5 Dec, 5, 2024 the day after the journalist won the aforementioned (two) first-place prizes at the SF
6 Press Club, the Dept sent out written notice of the cessation of “safe parking program in 90 days”
7 in spite of ten months left on the current lease with State Park and Rec.

8 39. It is of note, that the San Francisco Chronicle quoted the City’s own budget analyst saying
9 that the “safe parking program” (a.k.a. “Vehicle Triage Center”) was “the most expensive
10 homeless solution” produced by the Dept coming in at \$400 per RV per night. Again, overseen
11 by defendant FRIEDENBACH who was on (and still is) on the sub-committee overseeing this
12 dangerous internment camp (as MAYON was quoted in the prize-winning series calling it to be,
13 with proof in hand, with defendant MILLER no longer on the subcommittee as of April 2022,
14 and defendant URBAN ALCHEMY being the one who made “safe parking” so miserable for
15 \$400 a night per RV. Dozens of grievances ignored. The media ignored. HUD ignored.
16 MAYON’s 2024 litigation ignored. All the while defendants continue on their merry way
17 ignoring the painful way people were living (well, one died, actually) all the while, republishing
18 these misrepresentations about MAYON.

19 20 21 22 23 24 25 26 27 28 CRYSTALLIZATION OF INJURY

40. The recent settlement of the federal lawsuit featuring Plaintiff MAYON as paragraph #227,
titled *Coalition on Homelessness v. City and County of San Francisco*, finalized on or about
September 7, 2025, permanently embedded the false narratives about Plaintiff MAYON into the
legal record without correction. This settlement, which secured millions in attorney fees for
Defendants, served as a final, public republication of the falsehoods and eliminated any hope of
self-correction.

41. The use of MAYON’s work was not solely for litigation, but formed part of Defendants’
promotional and fundraising materials for their interconnected organizations, as it went on
continuously, without cessation, to being part and parcel of their advocacy work, and led no
doubt, to it (the misrepresentation) being read (i.e. the COH filings) all around the country by
most every homelessness advocacy groups hoping to learn how to litigate.

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3 **STATUTE OF LIMITATIONS**

4 42. Cause of Action "Right to Publicity" SOL IS based on the re-publication of the offending
5 materials by way of a settlement approved by SF Board of Supervisors on Sept 7, 2025. SOL is
6 one year.

7 43. Fraud's SOL is three years from the date of discovery which Plaintiff MAYON can show
8 to be Oct 9, 2022 by way of an email she sent to her assigned case manager at the "safe parking
9 program" on Oct 10, 2022 complaining about having first read the Defendant COH's complaint
and discovered herself in it.

10 44. Unfair Business Practices SOL is four years.

11 45. Libel's SOL is one year. The offending publication was Dec 13, 2024.

12 46. IIED statute of limitation is two years. It has been cumulative, with the final point of
13 injury being the settlement of the underlying lawsuit on Sept 7, 2025.

14
15 **FIRST CAUSE OF ACTION**

16 **FRAUD**

17 (Cal.Civ. Proc. Code § 338(d))

18 47. Plaintiff realleges and incorporates by reference paragraphs 1-47 as though fully set forth
19 herein.

20 48. Defendants FRIEDENBACH, COH, ACLU, and LCCRSF falsely asserted statements on
21 behalf of MAYON (who never asked to be in their lawsuit) and these are not vague opinions but
22 specific, factual assertions that can be proven true or false. Alleging MAYON "lost everything"
23 when she did not lose a single possession, and stating "NO notice" was given when her own
litigation acknowledges verbal notice, are clear contradictions.

24 49. Defendants knew these statements were false because they had previously paid for and
25 published Plaintiff's accurate account and were aware of her pro se litigation.

26 50. The misrepresentations were made with the intent to induce reliance by the court and the
27 public to secure a favorable litigation outcome and financial benefit for Defendants.

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3 51. The court and public reasonably relied on these false statements. As a direct and proximate
4 result of this fraud, Plaintiff MAYON has suffered damages, including reputational harm,
5 emotional distress, and the violation of her proprietary legal interests.

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7 **SECOND CAUSE OF ACTION**
8 **RIGHT OF PUBLICITY**
9 (Cal.Civ. Code § 3344)

10 52. Plaintiff realleges and incorporates by reference paragraphs 1-51 as though fully set forth
11 herein.

12 53. Defendants COH, FRIEDENBACH, ACLU, and LCCRSF knowingly used Plaintiff
13 MAYON's personal identity—in the form of her identifiable narrative and unique
14 experiences—for their direct commercial and strategic advantage in litigation and related
15 advocacy. This use was without Plaintiff MAYON's consent.

16 54. These statements were material misrepresentations that could be proven false and were
17 made with knowledge of their falsity or reckless disregard for the truth. Plaintiff was identifiable
18 by unique descriptive references and quotations tied to her litigation and personal circumstances,
19 despite not being named. This is because the exact same city attorney's office was forced to deal
20 with me in 2020-21 filings, in which the statement used by Defendants in their 2022-25 lawsuit
21 was a clear and exact quote from the Declaration made by the City's then-head of the Dept of
22 Homelessness and Supportive Housing ("the Dept"). It was unmistakable to them who the
23 "unhoused" person was in paragraph #227.

24 55. Plaintiff MAYON is identifiable (to certain parties — the one she is directly involved with:
25 the City Attorney's office, due to the forming of the tenant union October 2023 and second set of
26 pro se filing January 2024. The Defendant COH's use of a direct quote from a government
27 official that is linked to her specific pro se litigation makes her identifiable to a relevant
28 community (the court, the parties involved in the case, the city). Legal causes of action for
misrepresentation or right of publicity often turn on whether a person is "identifiable," not strictly
on whether their full name is used, thus the core issue of misrepresentation is control over one's
identity. It's not just about the factual inaccuracies; it's about the false affiliation and ideological
hijacking of her story and her own legal aspirations. Seeing herself included - yet distorted - in
the COH lawsuit chilled her speech, because she knew she now had to carry the extra baggage of

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3 a false association with Defendant FRIEDENBACH which did not exist, yet all involved would
4 certainly think so just seeing paragraph #227.

5 56. This unauthorized use has caused Plaintiff MAYON compensable injury, including damage
6 to her reputation as an independent advocate, loss of control over her identity, emotional distress,
7 and the false and offensive affiliation with an organization whose methods she opposes.

8 **THIRD CAUSE OF ACTION**
9 **UNFAIR BUSINESS PRACTICES**
10 (Bus.& Prof. Code § 17200)

11 57. Plaintiff realleges and incorporates by reference paragraphs 1-56 as though fully set forth
12 herein.

13 58. This conduct—soliciting, paying for, and publishing a person's authentic story, only to later
14 misappropriate and distort that same story for institutional gain—constitutes a fraudulent business
15 practice and a breach of the limited license granted for the original publication.

16 59. The acts and practices described above, including the fraudulent misappropriation of
17 Plaintiff's story (after they entered into a transitional relationship by the purchase of publishing
18 rights to her February 2021 essay for \$60) were practices designed to, and did secure, an unfair
19 competitive and financial advantage for Defendants, harming Plaintiff MAYON and the public
20 generally.

21 **FOURTH CAUSE OF ACTION**
22 **DEFAMATION/LIBEL**
23 (Cal.Civ. Code § 45)

24 60. Plaintiff realleges and incorporates by reference paragraphs 1-59 as though fully set forth
25 herein.

26 61. On or about December 13, 2024, Defendant URBAN ALCHEMY, through its agents and/or
27 employees, published false and defamatory statements of fact about Plaintiff to the SF Standard,
28 identifying her and her fellow union members (all named) as a "leeches," "squatters," and
"entitled troublemakers."

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3 62. Upon information and belief, these statements were authorized or ratified by URBAN
4 ALCHEMY management. The article itself does contain other statements by named URBAN
5 ALCHEMY staff, as well as the Dept brass, lending even more weight to the defamatory
6 statements.

7 63. These statements were defamatory on their face (defamatory per se), as they accused
8 Plaintiff of criminal conduct ("squatting") and attacked her character in her profession as an
9 advocate and organizer. The libelous publication was made with malice and as a direct
10 retaliation for Plaintiff's protected advocacy. As a direct result, Plaintiff has suffered damage to
11 her reputation, severe emotional distress, and has been subjected to a chilling effect on her
12 speech.

13
14 **FIFTH CAUSE OF ACTION**
15 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
16 (California Code, Civil Code - CIV § 1708)
17

18 64. Plaintiff realleges and incorporates by reference paragraphs 1-63 though fully set forth herein.

19 65. Defendants' conduct, as a whole—including the knowing misappropriation and distortion of
20 her life story, the retaliatory defamation, and the exploitation of their power over her living
21 situation—was extreme, outrageous, and conducted with reckless disregard for the probability of
22 causing Plaintiff severe emotional distress. Defendants were aware of Plaintiff's vulnerable
23 status as an impoverished, disabled individual with advanced cancer.

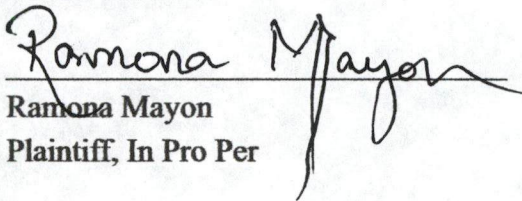
24 66. As a direct and proximate result of this outrageous conduct, Plaintiff has suffered severe
25 emotional distress.
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3 **PRAYER FOR RELIEF**
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5 **WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:**

6 **For general damages according to proof at trial; For special damages according to proof at trial;**
7 **For punitive damages, pursuant to California Civil Code § 3294, due to Defendants' despicable**
8 **conduct carried out with malice, oppression, and fraud; For injunctive relief prohibiting**
9 **Defendants from any further use of Plaintiff MAYON's identity, name, likeness, or personal**
10 **narrative; For costs of suit incurred herein; and For such other and further relief as the Court**
11 **deems just and proper.**

12 Respectfully submitted,

13 
14 **Ramona Mayon**
15 **Plaintiff, In Pro Per**

DATED: October 8, 2025

EXHIBIT LIST

- A) Proof of date of discovery of Fraud is in Oct 10, 2022 email to the Dept case mg
- B) Highlight where MAYON appears in the COH litigation as paragraph #227 on page 75
- C) Proof that the City settles with COH on Sept 7, 2025
- D) MAYON 2020 pro se litigation with proof of her statements highlighted
- E) Feb 2021 essay in COH's Street Sheet: I state there was notice/ I lost nothing highlighted
- F) Proof of offer to pay
- G) My hesitation to accept payment
- H) Proof \$60 was paid
- I) Photo proof MAYON took down her tent Nov 16, 2020
- J) Proof of blog entries for this time-frame @ www.ramona-mayon.com
- K) HUD claim filed Oct 1, 2024
- L) SF Standard article Dec 13, 2024
- M) Proof of Defendant Lena Miller on OCOH oversight committee
- N) Proof MAYON continues to litigate pro se on behalf of the unhoused June 3, 2025

1
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3 **TABLE OF AUTHORITIES**
4

5 **I. FRAUD**

6 **California Code, Code of Civil Procedure - CCP § 338**

7 Within three years:

8 (a) An action upon a liability created by statute, other than a penalty or forfeiture.

9 (b) An action for trespass upon or injury to real property.

10 (c)(1) An action for taking, detaining, or injuring goods or chattels, including an action for the
11 specific recovery of personal property.

12 (2) The cause of action in the case of theft, as described in Section 484 of the Penal Code, of an
13 article of historical, interpretive, scientific, or artistic significance is not deemed to have accrued
14 until the discovery of the whereabouts of the article by the aggrieved party, the aggrieved party's
15 agent, or the law enforcement agency that originally investigated the theft.

16 **II. RIGHT TO PUBLICITY**

17 **California Civil Code - CIV § 3344**

18 (a) Any person who knowingly uses another's name, voice, signature, photograph, or likeness,
19 in any manner, on or in products, merchandise, or goods, or for purposes of advertising or
20 selling, or soliciting purchases of, products, merchandise, goods or services, without such
21 person's prior consent, or, in the case of a minor, the prior consent of his parent or legal
22 guardian, shall be liable for any damages sustained by the person or persons injured as a result
23 thereof. In addition, in any action brought under this section, the person who violated the
24 section shall be liable to the injured party or parties in an amount equal to the greater of seven
25 hundred fifty dollars (\$750) or the actual damages suffered by him or her as a result of the
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4 unauthorized use, and any profits from the unauthorized use that are attributable to the use and
5 are not taken into account in computing the actual damages. In establishing such profits, the
6 injured party or parties are required to present proof only of the gross revenue attributable to
7 such use, and the person who violated this section is required to prove his or her deductible
8 expenses. Punitive damages may also be awarded to the injured party or parties. The prevailing
9 party in any action under this section shall also be entitled to attorney's fees and costs.

10 11 **III. UNFAIR BUSINESS PRACTICES**

12 **California Code, Business and Professions Code - BPC § 17200**

13
14 As used in this chapter, unfair competition shall mean and include any unlawful, unfair or
15 fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising and any
16 act prohibited by Chapter 1 (commencing with Section 17500) of Part 3 of Division 7 of the
17 Business and Professions Code.

18 19 **IV. DEFAMATION/LIBEL**

20 **California Code, Civil Code CIV § 45**

21 Libel is a false and unprivileged publication by writing, printing, picture, effigy, or other fixed
22 representation to the eye, which exposes any person to hatred, contempt, ridicule, or obloquy, or
23 which causes him to be shunned or avoided, or which has a tendency to injure him in his
24 occupation.
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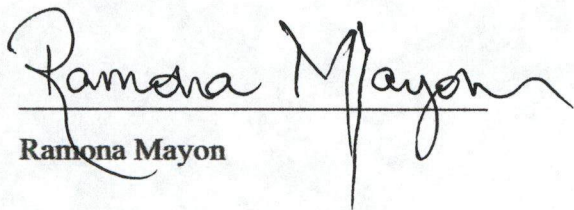
1
2
3 **V. IIED**

4 **California Code, Civil Code - CIV § 1708**

5 Every person is bound, without contract, to abstain from injuring the person or property of
6 another, or infringing upon any of his or her rights. (re. IIED)
7

8
9
10 This document was created by the Plaintiff Ramona Mayon who states the Word Count is 5204

11 I, RAMONA MAYON, declare that I am the Plaintiff in this action; that I have read this
12 Complaint and know the contents thereof; and that the same is true of my own knowledge, except
13 as to those matters which are alleged on information and belief, and as to those I believe it to be
14 true.
15

16 
17 _____
18 Ramona Mayon

Dated Oct 8, 2025

Subject Mayon (F-4)
To: [Craig Martin <craig.martin@bayviewci.org>, Kenneth Underwood <kenneth.underwood@bayviewci.org>]
From Ramona Mayon <ramonamayon@yahoo.com>
Date: Mon, Oct 10, 2022 at 9:19 AM

UPDATE

(you have my express permission to forward this)

Yesterday I had the absolute displeasure of discovering the ACLU and the Bay Area Lawyers Committee for Civil Rights and other actual attorneys who should know better have used my litigation with the City as an anonymous "unhoused person" in 2020.

page 75, paragraph 227

They describe what happened falsely but then directly quote what the then-head of Dept. of Homelessness had answered (no, he SIGNED it under penalty of perjury) and this guy now works in the high up level of Urban Alchemy promoting it to other cities.

In other words, I possess one of the few pieces of actual real evidence in the new utterly rambling cut-and-pasted Homeless Coalition lawsuit and it pertains legally to a person employed by the company overseeing me and my death.

Sincerely,
Ramona Mayon



LAWYERS' COMMITTEE FOR CIVIL
RIGHTS OF THE SAN FRANCISCO BAY AREA
Zal K. Shroff, MJP 804620*
Elisa Della-Piana, SBN 226462
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San Francisco, CA 94105
Telephone: (415) 543-9444
zshroff@lccrsf.org
edellapiana@lccrsf.org

**application pro hac vice pending*

Attorneys for Plaintiffs

Additional Counsel Below

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COALITION ON HOMELESSNESS; TORO
CASTAÑO; SARAH CRONK; JOSHUA
DONOHUE; MOLIQUE FRANK; DAVID
MARTINEZ; TERESA SANDOVAL;
NATHANIEL VAUGHN,

Plaintiffs.

v.

CITY AND COUNTY OF SAN FRANCISCO;
SAN FRANCISCO POLICE DEPARTMENT;
SAN FRANCISCO DEPARTMENT OF
PUBLIC WORKS; SAN FRANCISCO
DEPARTMENT OF HOMELESSNESS AND
SUPPORTIVE HOUSING; SAN FRANCISCO
FIRE DEPARTMENT; SAN FRANCISCO
DEPARTMENT OF EMERGENCY
MANAGEMENT; LONDON BREED, in her
official capacity as Mayor; and SAM DODGE,
in his official capacity as Director of the
Healthy Streets Operation Center (HSOC),

Defendants.

Case No. 3:22-cv-05502

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

**PLAINTIFF'S
EXHIBIT**

B

COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF
CASE NO. 3:22-cv-05502

1 O. The City Has Repeatedly Been Put On Notice Regarding Its Failure to Comply with
2 Constitutional Requirements and Its Own Policies—And Has Flatly Ignored Calls
3 to Correct its Conduct.

4 225. The City's unconstitutional conduct is not a secret. Advocates and attorneys have
5 been working with the City *for years* to change their clearly unlawful practices. No written policy
6 change has stopped the regular, on-the-ground constitutional violations: staff continue to admit
7 that they are engaging in criminalization and property destruction activity that is plainly
8 unconstitutional.

9 226. In 2018, for example, Jeff Kositsky, as the head of HSH—an agency purportedly
10 tasked with providing unhoused individuals shelter access—boldly asserted that “Public Works
11 and SFPD can clear areas rapidly when there is not a designated resolution in progress”—
12 effectively encouraging informal sweep operations without proper notice, bag and tag, and other
13 procedures. DPW worker Peter Lau was similarly direct about the City's goals: “We need to stay
14 very diligent and proactive in addressing tents. [...] Take them down as you see them.” These
15 directives from high-level City employees have built a culture of non-compliance.

16 227. In fact, in response to a TRO in 2020 filed by an unhoused person who had their
17 belongings seized and destroyed without advance written or verbal notice, the City erroneously
18 retorted that advance notice was not required: “The City is not required to comply with the notice
19 provisions of Proposition Q when enforcing laws other than Proposition Q, and the encampment
20 resolution at issue here was not an enforcement action under Proposition Q.”

21 228. The City has had full knowledge of its misconduct. As recently as 2021, HSOC
22 admitted that it needed to “develop and implement a process for noticing encampments in advance
23 of a resolution” and reported: “City Attorney working with HSOC on noticing issues.” As
24 recounted above, these efforts have not changed the experience of unhoused individuals—who
25 continue to be targeted for sweep operations without receiving appropriate advance notice.

26 229. Indeed, on March 30, 2021, while discussing a planned sweep, then-HSOC Director
27 Kositsky instructed City workers to “[g]ive everyone 45 minutes to clear and area [sic] if not
28 cooperating consider enforcement.” Kositsky did not indicate that any prior notice of the sweep

[Home](#) > [News](#) >

**San Francisco Supervisors Unanimously Approve Settlement Requiring the City to
Protect Unhoused People's Belongings**

San Francisco Supervisors Unanimously Approve Settlement Requiring the City to Protect Unhoused People's Belongings

The final vote is scheduled for Sept. 16

For Immediate Release: SEP 09, 2025



Media Contact: press@aclunc.org, (415) 621-2493

SAN FRANCISCO —Today, the San Francisco Board of Supervisors voted unanimously to approve a [settlement](#) with the Coalition on Homelessness, to be followed by a second and final vote on Sept. 16. The settlement requires the city to follow its bag-and-tag policy and establishes strong accountability and oversight measures. The Coalition had sued the city in 2022 over its practice of throwing away unhoused people's property during encampment sweeps. If the settlement is approved, and signed by Mayor Daniel Lurie, it will be entered as a court order.

Under the terms of the five-year court order, San Francisco must give unhoused people an opportunity to reclaim their belongings before the city can destroy them. The city also must give notice of planned sweeps to



unhoused people and the Coalition, provide the Coalition with quarterly reports on property seizures and monthly access to the storage yard, train Department of Public Works staff on proper procedures for handling personal property, and provide photo documentation of property at encampments slated for clearing. If San Francisco changes its bag-and-tag policy in the future, it must adhere to agreed upon standards to ensure that any future policy protects unhoused people's constitutional rights.

Part of the attorneys' fees awarded under the settlement will be used to monitor the city's compliance with the court order. Evidence of violation or routine unlawful property destruction can be brought before a judge. The Coalition did not seek monetary damages in the lawsuit and will not receive any money from the settlement.

The ACLU Foundation of Northern California, Lawyers' Committee for Civil Rights of the San Francisco Bay Area, and Emery Celli Brinckerhoff Abady Ward & Maazel represented the Coalition and the individual unhoused plaintiffs.

"For the first time, San Francisco is being held accountable for how it handles unhoused people's belongings," said John Do, senior attorney at the ACLU of Northern California. "We will be watching closely, and if we determine that the city is still unlawfully destroying people's property, we will ask the court to intervene."

Although the bag-and-tag policy requires the city to store people's belongings, the lawsuit alleged that city workers routinely threw out tents, sleeping bags, medication, and

identification documents unhoused people need to prove their eligibility for the very programs that could help them secure employment, housing, and benefits, even when those items were not abandoned.

Plaintiff Sarah Cronk, who spent many years unhoused in San Francisco, said losing her belongings—including a tent, clothing, and phones—derailed her attempts to find housing.

"When you're trying to survive on the streets, losing almost everything you own is traumatic and destabilizing," said Cronk, who now lives with her partner and young daughter in subsidized housing. "There were times when we thought we were making real progress toward getting back on our feet, but then the city would sweep through and pull the rug out from under us, leaving us reeling and scrambling to replace necessities."

"This settlement—and the accountability and oversight measures in it—are the result of our clients' tireless efforts to ensure that unhoused people are afforded the same constitutional protections as anyone else," said Nisha Kashyap, program director, Racial Justice, Lawyers' Committee for Civil Rights of the San Francisco Bay Area.

While sweeps may force unhoused people to relocate, they don't reduce the overall number of people who are unhoused. The waitlists for shelter and housing remain long, proof there is unmet need for safe and affordable places to live in San Francisco.

"Ultimately, we hope this settlement encourages the city to redirect its limited resources away from sweeps and instead invest more in extremely low-income housing and acquiring existing units," said Jennifer Friedenbach, executive director of the Coalition on Homelessness. "When someone loses their home, it is devastating. Losing what is left of their belongings in a sweep makes it even harder for them to recover."

"We are pleased that San Francisco has recognized that compliance with its bag-and-tag policy is critical to the protection of unhoused individuals' constitutional rights," said Vasudha Talla, of counsel at Emery Celli Brinckerhoff Abady Ward & Maazel and lead trial counsel.

[Key Milestones: Coalition on Homelessness v. City and County of San Francisco](#)

File Under: Rights of Unhoused People

BECOME A MEMBER

Real change starts with you – and every one of us can help make a difference.

JOIN US

STAY INFORMED

Sign up for ACLU updates

Ramona Mayon (pro se)
General Delivery
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San Francisco, California 94102
telephone #415-595-6308
ramonamayon@yahoo.com

ENDORSED
FILED
San Francisco County Superior Court

NOV 25 2020

CLERK OF THE COURT

By: BOWMAN LIU
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE CITY AND COUNTY OF SAN FRANCISCO**

RAMONA MAYON

Petitioner

vs.

CITY & COUNTY OF SAN FRANCISCO

Respondent

) Case No.: CGC -20-588010

)
) COM PLAIN T and
) EX PARTE APPLICATION FOR
) TEMPORARY RESTAINING ORDER
) AND ORDER TO SHOW CAUSE

)
) DATE: Mon, Nov 30, 2020
) TIME: 11 am
) DEPT: 302
)



**EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER
TO SHOW CAUSE WHY PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiffs, self-represented, hereby humbly request that the Court issues a temporary restraining order and an order to show cause why a preliminary injunction should not issue.

NEED FOR A TEMPORARY RESTRAINING ORDER

Plaintiffs seek a temporary restraining order to prevent the various departments of the City and County of San Francisco from continuing to tear down their homeless encampment, and other encampments in general within the City and County, without the required 24-hour notice per *SFPD Ordinance 169* and despite the City's own direct issuance of guidance May 19, 2020 and various statements by City officials March 23, 2020, as well as other medical professionals clearly stating that homeless encampments will not be broken up until after the pandemic is under control. The entire country is seeing numbers climb at present. The media reports that the City is evicting 500 of the more vulnerable homeless from the hotels at the beginning of November 2020 and four of SF supervisors are protesting an "unclear program" with no obvious plans to place people somewhere safe (all below in *Memorandum of Points and Authorities*). Then why would the various departments show up on a rainy day, without warning, and strike like brownshirts, ignoring their own laws? One HOT team social worker, who asked not to be named or photographed, told the author of this complaint that it was labeled as a "Resolution" in the books and by 10:30 am there were to be barricades erected. The "sweep" took until 11:30 am.

STATEMENT OF CASE

On Nov 18, 2020, beginning at approximately 7:15 am until 11.30 am 15 to 20 people were forced to vacate the homeless encampment located at Balboa Street and Great Highway. It has been there since before the pandemic began. The exact times are known because the author of this document, plaintiff Ramona Mayon took photos (Exhibit A) and video(s). All the people being taped clearly

give their names and/ or show their badges and give permission to be recorded. It was stated on video by one of the leaders of the “sweep”, the Park Ranger who was head of the Homeless (in the parks), that the reason that justified this “sweep” was a report that two 14-year-old girls had been in one of the tents making a porn movie. The Park Ranger is then clearly heard on the tape, changing her statement, saying it happened in one of the RVs in the encampments area (approximately 4 RVs, a van and 8 to 10 tents pre-”sweep”). She also stated that there were witnesses and photos. This is what allowed the no-notice “sweep” that was in direct contradiction of the City’s own directives, as well as the CDC’s. Further sweeps are likely to occur and plaintiff Ramona Mayon in particular was made to feel threatened because several of the sixteen (16) City workers (one SFFD paramedic who was said by all the others to be in charge: Mike Mason badge #19; 5 of SFPD; 2 of Park Rangers; and 9 of the Dept of Public Works) asked her directly where she was “camping or staying”. She did NOT tell them she had already removed her shelter and was sheltering-in-place in her small car. She is disabled, on SSI, and widowed four months ago by COVID-19, after a 27-year marriage.

The only tent allowed to remain, only because the plaintiffs physically blocked and refused to allow the tent of a very sick man (enlarged heart and fluid on the lungs) to be taken. It was literally and physically a stand-off between the author of this complaint and another angry homeless woman, also a plaintiff, and the assembled 16 City employees. While he sorted his belongings, stopping to gasp for air every ten minutes, all the while it was misting rain, two of the plaintiffs kept the City workers from taking his belongings by ourselves making trash piles to be taken. He too is a plaintiff. He was in the ER two days before this sweep. Dept of Public Health nurse visited him in the presence of the other plaintiffs on Nov 17, 2020. Along with the RVs, van and a car, this plaintiff’s tent (not on the sidewalk, but in the parking spaces between the RVs) is what remains of the homeless encampment.

Please note that at no time have there been toilets, sanitation, trash dumpsters, much less showers and food, in spite of weekly visits from the HOT team. Therefore, by intentionally failing to provide for the encampment’s sanitation needs, the City empowered itself to take advantage of the first two rainy days of the season to conduct the “sweep”. The only housing offered to the sick man was a

parking lot space downtown for his tent, away from his caregivers, while the rest of the residents were offered to be taken to the Moscone Center which has been made into a congregant shelter (in a pandemic). We were told we could take 2 bags, 1 bike and 1 pet. Told that a transport van would arrive shortly. At no time were we told that there was an option for our personal belongings to be stored. At no time was notice served or posted (in spite of a visit from a social worker on Nov 16, 2020 who verbally warned ONE of the plaintiffs that there was "most likely going to be a sweep on Wednesday."

The TRO and preliminary injunction sought by plaintiffs would only address the cessation of the "sweeps". Plaintiffs are preparing an administrative claim preceding a lawsuit to address the complete lack of notice and general contempt with which they were treated. It was cruel, inhumane in light of the pandemic raging and all we have are tents and cars. Over a dozen people living in the encampment signed a petition while the "sweep" was happening, affirming their desire to write affidavits and be a part of a lawsuit alleging civil rights abuses of not only the "sweep" itself, but the failure of the City to follow its own guidelines and provide basic essentials of life during a pandemic to the most vulnerable of society, all the while completely ignoring the written notice requirements of *Ordinance 169*. The TRO and preliminary injunction are necessary because another encounter is inevitable based on the City's willful disregard for both the CDC's guidance and the voter's wish to have the homeless in their City receive both notice of the pending "sweep" and notice that belongings could be stored for up to 90 days at no cost. As exhibit A shows, the only thing done on Nov 18, 2020 was to throw away the personal belongings of a dozen people, spread them out into the City to find another place to slept (minus a tent, sleeping bags, coat, shoes, medications, food, etc). All were severely traumatized. The complaint itself will have the videos transcribed and affidavits from all who can be found.

This motion is made on the ground that Plaintiffs have demonstrated they meet the requirements for a TRO: likelihood of success on the merits; likelihood of irreparable harm in the absence of preliminary relief; the balance of equities; and the injunction is in the public interest. *Winter v. Natural Res. Def. Council* 555 U.S. 7, 20 (2008)

RELIEF SOUGHT

Plaintiffs therefore respectfully request the court grant the *ex parte* application as follows:

First, Plaintiffs request that the City and County of San Francisco be restrained from dismantling homeless encampments until the pandemic subsides and the health order to shelter-in-place.

Second, Plaintiffs request that the City and County be made to explain why they refuse to give the sanitation supplies that they themselves insist should be supplied. The language they use in their own guidance is forceful and affirmative, as shown in II of the following Memorandum of Points and Authorities.

DATED: November 20, 2020

RAMONA MAYON
Pro Per



[Home Street Sheet](#) > [Uncategorized](#) > [COVID Widow on a Hunger Strike for Housing Rights](#)

February 1, 2021

COVID Widow on a Hunger Strike for Housing Rights

by Ramona Mayon

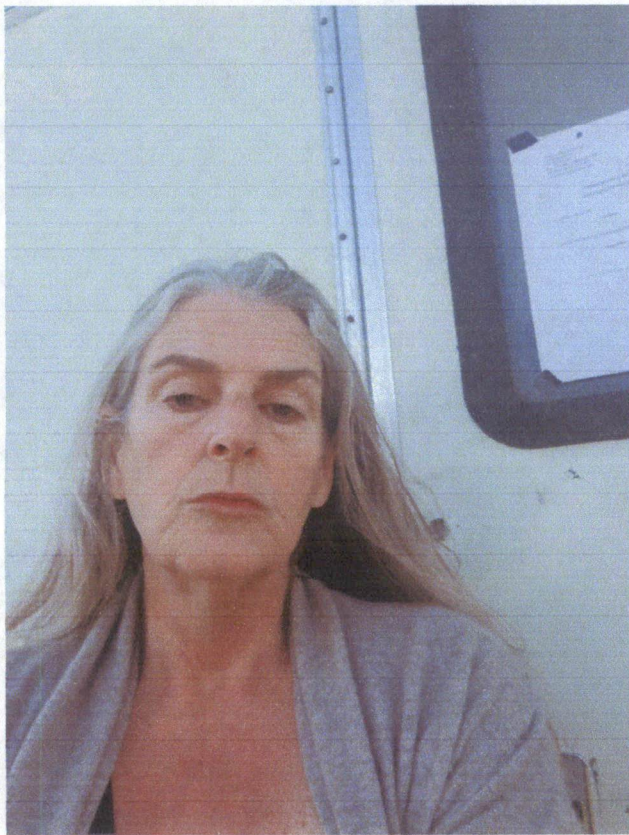
Parts of this essay have been removed due to space limitations, but you can read the whole story with more critical details on her blog at www.ramona-mayon.com/blog-this

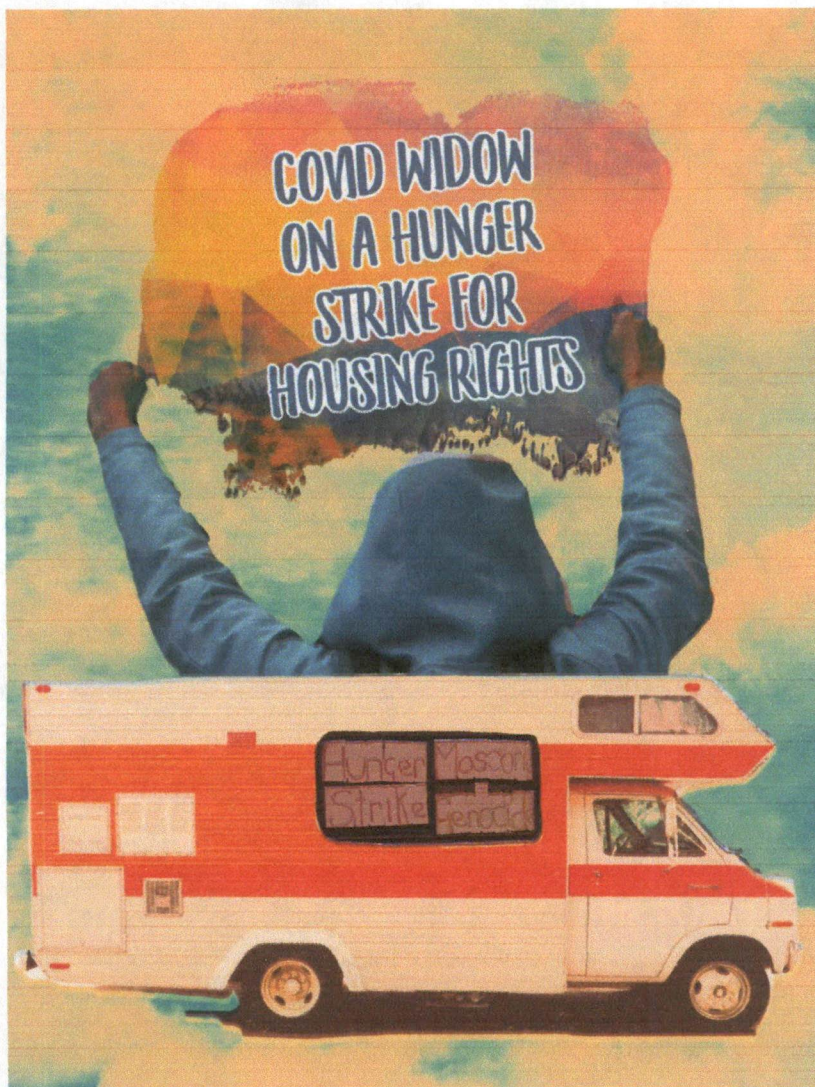
You know how a person in grief becomes unhinged and focuses so passionately on what killed their loved one, that they change some segment of the law or society. Well, that's happening to me. On December 23, 2020, at 2:30 p.m., I had enough. I ate my last meal that night. Sausage links, melted cheddar on English muffins, a cold can of Coca-Cola, a big hunk of Safeway's sock-it-to-me cake (the rest I gave away because I hate to see bakery goods go stale).

I'd rather die than live like this, made a criminal every night at 10 p.m. because I live on wheels, my home a threat to the neighbors simply because it exists on "their street." Already once this home was taken away from me on March 18, 2020, so my husband couldn't die in peace, in his own bed, just because it's on wheels. Yeah, I'll go down thinking that was a good Last Supper.

MENU







I am a vehicle-dweller. Because of that, my husband and best friend of 27 years died a horrible, solitary death in a spider-infested trailer in the FEMA death camp at CalExpo/ Sacramento. March 18, 2020 was the day our life was derailed by government action because Gov. Gavin Newsom closed the state parks, without the slightest bit of concern for the thousands of people who live full-time in the park system, and all other parks followed suit. We had been staying full time (but paying daily) at Sherman Island County Park outside Antioch. The closure order was carried out by Park Rangers, who told everyone the park would be closed at 9 a.m. the next morning. The RV wouldn't start. A fuel pump and ignition module has since been repaired for \$800. Instead of helping us or even allowing us time to arrange a mobile mechanic, we were thrown out of the park and our RV left there for five months. The caseworker who never laid eyes on us filed an Adult Protective Services report on me for neglect of my 68-year-old husband with liver cancer, finding him unsuitably housed. Yes, neglect because we lived in the RV.



We were forced into a Project Roomkey motel situation. We went to court (yes, a closed court, but because it was COVID-related issue we were allowed to file). Just the presence of a lawsuit made Sacramento County Department of Health Services (DHS) back off and pay the room vouchers (\$8,000). We had to provide our own food, regardless of what the rules are. I have emails back and forth about all this and also where I am calling it elder abuse to not help us back into our RV-home. There was the only offer of a group home with four other couples and a house mother — in a pandemic. Again, back to court. They paid for the motel room from March 19 to June 13, 2020, then moved us to the FEMA trailer. I am completely at a loss to even really talk about that except to say there was no medical care, none. This place was promoted in the media as being “medically supported.” It was not. My husband got a spider bite and it really affected him. I sent texts with pictures to the on-site “nurse” (who did the daily temp checks around the camp). She replied with apologies that there was no doctor to see him.

My point is, though, and that’s what I will be asking the court next, *why **aren’t** there services for me?* I qualify by age, by poverty, by disability. What I need will actually prevent me from ending up in a doorway and cause me to be housed for the rest of my life. Why doesn’t the City help?

He died three days later in my arms, a hard and painful death. No one came to help me nor even contacted me one single time after I left there. I couldn’t even get the last load of laundry returned with his — and my — favorite clothes in it. People in prison have more care.

The first three months after his death, I stayed with a daughter north of Truckee until her landlord threatened her with legal action. I decided to join the camping club “Thousand Trails” and camped in Manteca, Nicolaus, Morgan Hill and Hollister. The



experience proved what I had suspected all along: that people were being cheated out of decent campground set-ups by the so-called homelessness industry. Then, as fate would have it, my SUV sprang a serious oil leak. The only thing I could do was make a mad, midnight dash for San Francisco along the mountains, coming up the Pacifica way, running at night to avoid the traffic. I managed not to blow the engine and was so relieved to roll onto the Great Highway on October 15 just after 2 a.m. It felt really, really good to be back on the beach where my husband and I had lived from 1997 till 2012, the first decade in a black Bluebird school bus and later on in an RV. Our children all think of the Sunset avenues as their childhood home.

So how did I come to be on the Great Highway (at Santiago) on a hunger strike, now day no. 22? Almost as soon as I got back to the city, I ran into an old friend who was in a trailer, with a collection of other RVs and a few tents nearby. She had a generator so I could charge my power pack and it felt good to hear her tell others about how she knew me when I was raising my kids in an old black school bus on this very same beach. To get around the back pain I was suffering being in the SUV all the time, I put my tent up at the edge of the encampment to spend days in it, while still sleeping in my SUV, for safety reasons obviously. This move put me on the HOT team's radar. I found it interesting that as long as I was asleep in my car, I was of no interest to them. I was signed up the first time for "services" on November 16, two days before the sweep at Balboa and Great Highway. There had been one worker who left his card and told my friend there was to be a sweep on Wednesday (November 18). I simply didn't put my tent up the next day or the next, but rather waited it out. On Wednesday, I showed up right after daylight, about three minutes before it started. I filmed the whole thing and it was, of course, disturbing. (Photos at www.supportsurvival.home.blog)

I was especially outraged by the way the City employees weren't adhering to the law about the removal of tents, and instinctively knowing as well that offering the Moscone Center, set up as a congregant shelter, in a pandemic, would not pass muster under *Martin v. Boise*, I was at court filing paper day before Thanksgiving. To kick things off, I asked for an order to show cause why no sanitary services had been provided per the CDC recommendations and the City's own written guidelines. I asked for the City to be restrained from further sweeps until after the pandemic was over. In spite of the judge graciously moving the meeting up to working on Zoom, instead of CourtCall, and devoting 50 minutes to my complaint, expressing grave concerns about the lack of posted 24-hour notice on the tents, there was "no relief" to be had (mostly, the recent Hastings Law School settlement seemed to be why). I knew the matter was far from over, so I simply put my tent back up, this time next to my friend's trailer. I was right. December 10, 2020, the same group of employees came back, doing the same exact thing: no notices, no offer of services, no concern they are being filmed, and the only

offer of shelter is the Moscone Center. This time I took my tent down in front of them, stored it in the top carrier, and began to have to use my SUV again full-time. I am on SSI for scoliosis of the hip and two herniated discs, all seen on the MRI, etc. I have no business sitting in a car 24/7 and then complaining I am losing even more of my mobility. Going numb, in fact.

“Possessing and protecting property...seeking safety...and privacy” is why I sent for my RV to be delivered to the Great Highway (via AAA) on the day before the first big winter storm in the mountains. It arrived on December 23, 2020 at 2:30 p.m. to the “real” residents coming out their houses yelling obscenities and telling me they were calling the police. That went on about 45 minutes as I plastered the side of my RV with hand-lettered signs saying “COVID Widow on Hunger Strike.” My husband’s ashes and all our belongings are finally back in my care and I have NIMBYs screaming their hate consciousness at me because of unconstitutional exclusionary zoning practices that have empowered them in their hate.

Of course I am on a hunger strike! What alternative do I have?

The second TRO request garnered me a filed paper from SFPD saying they have no plans to tow (although it’s more likely to be SFMTA who tows). The police also came out and told the neighbors I have a gameplan and that they think it’s a real pity no one will “step up and help” me. So let me tell you what the City’s HOT team has offered me: small bags of toiletries; individual size bottled waters (two at a time); a pair of socks; directions to a shower downtown in the Tenderloin; knowledge of a charity that “might” pay for smog and DMV fee; asked me to email them an estimate of what it would take to fix my RV so I can leave SF; an offer of a nurse to look at the stitch left in my nose from the accident; an offer to set me up with a grief counselor; an offer of a spot at St. Mary’s winter shelter (only 67 people and my car can be left parked on the street); an offer of transport to the downtown Moscone Center, maximum capacity 400 people and their pets. That’s 800 opportunities to catch COVID-19. The services that the municipalities are being paid by the federal grants to keep our vulnerable communities safe — or at least safer — are without oversight or organization, much less accountability, just a constant wash of money and a regular outcry for more unsupervised money because the problem is getting worse.

And that’s what I became unhinged over. That’s why I am on a hunger strike. Because of the HATE of vehicle dwellers (a minority) by those who live in regular houses (the majority). I have lived in FEAR 22 days now simply because I live in an RV. Because “they” want to take away the safety and comfort I have found in the last three weeks



being back in my home, even if it's on the side of the road waiting for the necessary work. Like living in an RV is a crime. Oh wait, it is in San Francisco.

My point is, though, and that's what I will be asking the court next, why *aren't* there services for me? I qualify by age, by poverty, by disability. What I need will actually prevent me from ending up in a doorway and cause me to be housed for the rest of my life. Why doesn't the City help? And why is it OK for the neighbors to be this angry, to have thought it OK to have outlawed me and my vehicle from "their streets" for being "over-sized?" Where are the parks for people like me, who refuse to live in anything but their RV? That's the question I want my hunger strike to ask. The streets are full of us, and it's only going to get worse. The status quo is over. RVs are the solution to the housing crisis. Just give us parks. Give us services. Give us dignity.

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SOCIAL MEDIA



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Subject Re: article
To: [Ramona Mayon <ramonamayon@yahoo.com>]
From Quiver Watts <qwatts@cohsf.org>
Date: Wed, Feb 10, 2021 at 10:56 AM

Hey Ramona!

Just checking in to see how your hearing on the injunction went, and to see how I might be able to get you your payment for writing the article this past issue. Also wanted to set up a time for a podcast interview, if you're still amenable to it!

Hope you're holding up okay, thinking about you!

Q

On Fri, Jan 29, 2021 at 4:32 PM Ramona Mayon <ramonamayon@yahoo.com> wrote:

That's amazing. I didn't realize it was gonna lead. Oh wow. Thank you. That's so cool. Its been crazy watching people take photos of RV then walk on by. I have literally had ONE person ask me what's up. The way I take that is that I feel so strongly about this issue, spent years, decades really, deeply thinking and agitating over this right to house oneself however you can (if government won't do it, am I supposed to just die?)

Well, if I can't make headway, as articulate and litigious as I am, there's a realllllllll pipeline supply jam-up. I understand now why its being called a homelessness industrial complex. Thank you so much for helping me like this.

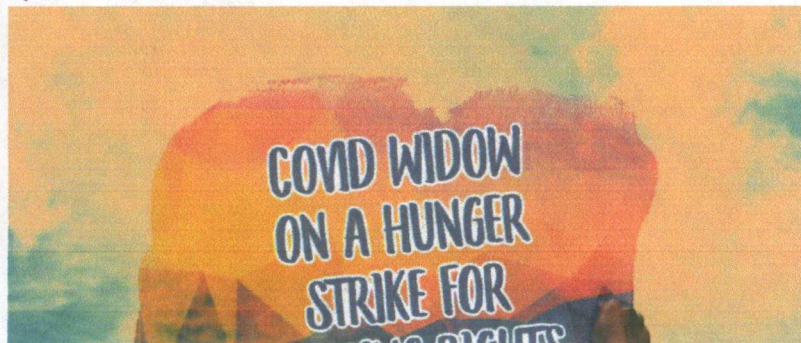
Ramona

On Friday, January 29, 2021, 04:12:39 PM PST, Quiver Watts <qwatts@cohsf.org> wrote:

Thank you so much Ramona, the photos will I think really help bring it home for folks (so to speak). Let's touch base after Wednesday so I can hear about your efforts with the injunction! I'll look forward to talking with you!

In the meantime I want to make this the cover story for our upcoming issue, so worked up a little cover art to go with the story. Let me know what you think!

Q



Subject Re: article for Street Sheet
To: [Ramona Mayon <ramonamayon@yahoo.com>]
From Quiver Watts <qwatts@cohsf.org>
Date: Thu, Jan 14, 2021 at 7:23 PM

Thank you Ramona!

We would still love to offer compensation, and we don't need the rights to the piece as long as you give us permission to print it :)

Let me know if that works for you?

Quiver

On Thu, Jan 14, 2021 at 10:22 AM Ramona Mayon <ramonamayon@yahoo.com> wrote:
I don't think this is suitable to sell the rights to, because I will be using it to send to press people. I am losing the energy to write prolongedly, so I need to keep the rights to this piece.

If you would like to use it, or part of it, please do. No payment necessary. I would be honoured.

Ramona Mayon

—
Quiver Watts (they/them)
Street Sheet Editor
Coalition on Homelessness
(415)246-3740 x309
280 Turk Street
accessible entrance through 290 Turk



Subject Re: Status update
To: [Ramona Mayon <ramonamayon@yahoo.com>]
From Quiver Watts <qwatts@cohsf.org>
Date: Wed, Feb 17, 2021 at 5:07 PM

Sorry for the long delay! Have you seen a copy of the paper yet? :)

You've sent \$60.00 USD
to
gregmayon@hotmail.co
m

We'll let gregmayon@hotmail.com know you sent it.

Tell us how this transaction went

Send More Money

[Go to Summary](#)



On Thu, Feb 11, 2021 at 7:34 AM Ramona Mayon <ramonamayon@yahoo.com> wrote:
Good Morning Quiver,

I changed direction of my litigation strategy. Yes, I'm still going to "re-ask" for the citywide injunction but as I've been working on this, I have come to the conclusion that we are looking at municipal fraud, at least in respects to the sub-group labeled as RV dwellers and I have standing to bring the case. I have been doing some digging online and pulled up some really awful quotes by Jeff Kositsky about us RV people. They show a pattern and practice that I think should be highlighted to the court (I'm thinking federal, more than the local judge, but he gets a chance to see it too - and act or not).

Also I am bringina to the court the 34 second video of the mavor saving out-of-

towners get no help.

<https://supreme.justia.com/cases/federal/us/526/489/> says otherwise.

So Im gonna hold off on the podcast a few more days until I have the paper written. The angle I am going with is the waste of 1.7 million dollars to "serve" 75 vehicular dwellers. And where are these people now after 1.7 mil was invested in their lives? In the article in SF Examiner on Feb 8, all are quoted as saying that it was a great success. For WHO? I figure a few more days I will have it written. The brief itself is already 10 pages of just quotes and the aforementioned pattern details.

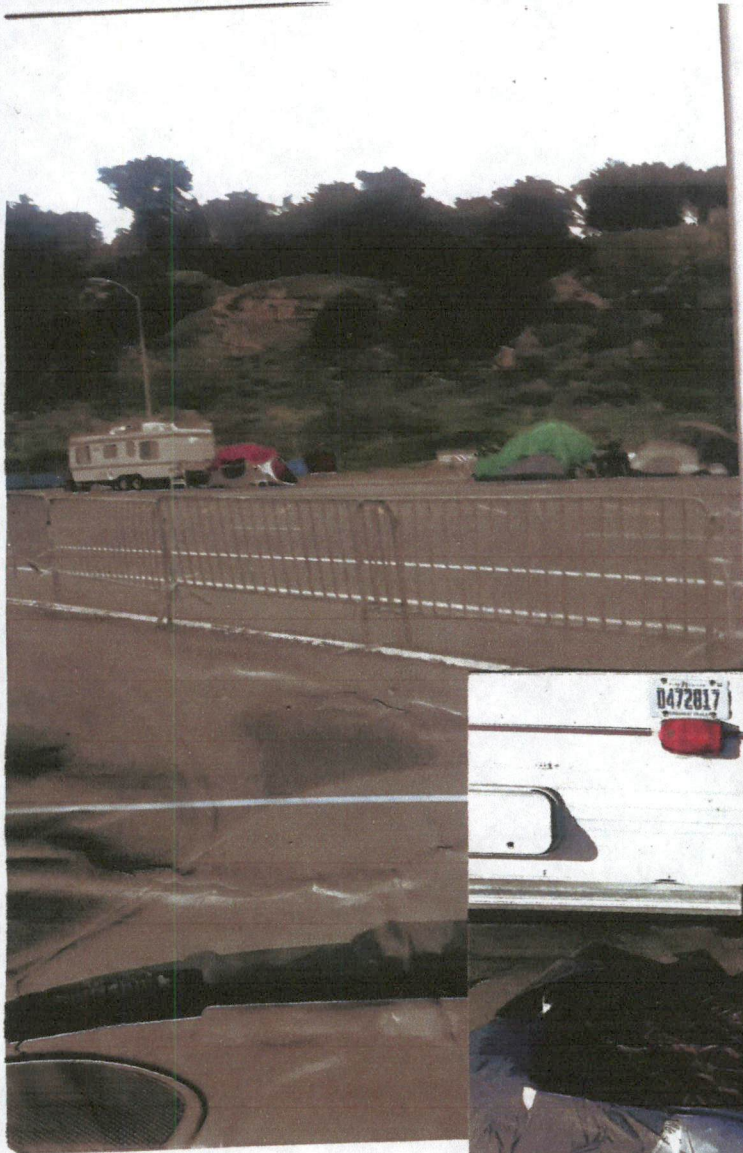
My personal situation here is getting pretty tense. I can't get the repairs done quick enough on a SSI budget. Check your next email. I will just forward you the email I wrote the cop (who gave me his card at the beginning of this debacle). I am also attaching photos of the new signs I put out a minute ago. These people scare me. I am tired, old, sick, poor, and in so much grief. Why, in a pandemic, as a fellow American, do I have to be afraid of the neighbors? That's what I want the judge to answer me. Well, actually that's the first sentence in the letter to the Human Rights Commission I plan to send as soon as the filing is done. Yeahhhhhh I scared. But so is every other soul "unhoused" in a vehicle or tent or doorway.

My PayPal # is gregmayon@hotmail.com and thank you for a wonderful editing job. I couldn't even see where you took stuff out, it was that smooth.

-R

—
Quiver Watts (they/them)
Street Sheet Editor
Coalition on Homelessness
(415)246-3740 x309
280 Turk Street

accessible entrance through 290 Turk





POLITICS

To the Passersby whom I
hear calling to report me
and ask for a well-check
^

February 26, 2021

The City refuses to help as of Jan 21, 2021.

blog @ www.ramona-mayon.com





LITIGATION

“I’m going to fight to get
your ass towed.” ^

February 17, 2021



U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity – Region IX
One Sansome Street, Suite 1200
San Francisco, CA 94104-4430
Voice: (800) 347-3739 TTY: (415) 489-6564
TTY: (415) 489-6564

October 01, 2024

Ramona Mayon
1559 Sloat Blvd Ste B Box 175
San Francisco, CA 94132

Dear Complainant:

Subject: Housing Discrimination Complaint
Mayon, Ramona v. Urban Alchemy, et al.
HUD File No.: 09-25-5540-8
Section 504 Case No.: 09-25-5540-4
ADA Case No.: 09-25-5540-D

Your complaint, alleging one or more discriminatory housing practices, was officially filed on October 01, 2024 as a complaint under the Federal Fair Housing Law, 42 U.S.C. Sections 3601-3619. For your records, we are enclosing a copy of your complaint, and, as required by law, a copy has been sent to the respondent(s).

The purpose of this letter is to inform you of: 1) the rights you have during the processing of this complaint, 2) the rights each respondent has in responding to this complaint, and 3) the steps the U.S. Department of Housing and Urban Development (the Department) will take to determine whether the complaint has merit.

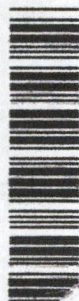
Since a respondent organization is a recipient of federal financial assistance, the complaint has also been accepted and will be investigated by the Department under Section 504 of the Rehabilitation Act of 1973 as amended.

Section 504 states:

No otherwise qualified individual with handicaps in the United States... shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Since a respondent is also a "public entity" as defined by Section 201 of the Americans with Disabilities Act (ADA), the complaint has also been accepted and will be investigated by the Department under Title II of the ADA as amended.

Title II states:



Housing Discrimination Complaint

Fair Housing Act Case No.: 09-25-5540-8
Section 504 Case No.: 09-25-5540-4
ADA Case No.: 09-25-5540-D

1. Complainants:

Ramona Mayon
1559 Sloat Blvd Ste B Box 175
San Francisco, CA 94132

2. Complainant Representatives:**3. Other Aggrieved Parties:**

None

4. The following is alleged to have occurred or is about to occur:

- Discriminatory terms, conditions, privileges, or services and facilities
- Discriminatory acts under Section 818 (coercion, Etc.)
- Failure to make reasonable accommodation

5. The alleged violation occurred because of:

- Disability
- Retaliation

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

Bayview Vehicle Triage Center
500 Hunters Point Expressway
San Francisco , CA 94124

7. Respondents:

Angelica Valara
City and County of San Francisco, HSH
440 Turk St
San Francisco, CA 94102



City and County of San Francisco
c/o Carmen Chu, City Administrator
1 Dr Carlton B Goodlett Pl #362
San Francisco, CA 94102

Urban Alchemy
c/o URS Agents Inc., Registered Agent
7801 Folsom Blvd #202
Sacramento, CA 95826

8. The following is a brief and concise statement of the facts regarding the alleged violation:

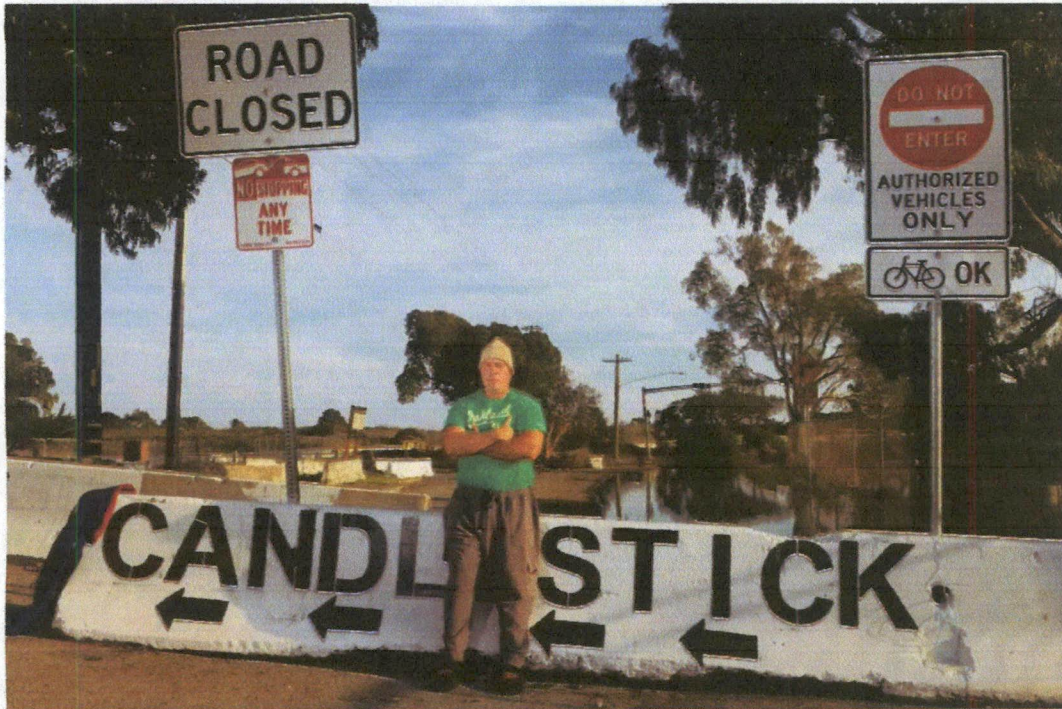
Complainant is Ramona Mayon, a person with disabilities as defined by the federal Fair Housing Act. Respondents are Urban Alchemy (property management), the City and County of San Francisco (owner/administrator of the Bayview Vehicle Triage Center), and Angelica Valera (city program manager). The subject property is a RV park property run for homeless and supportive housing that is financed as a program through the City and County of San Francisco. Complainant is a participant in the program and owns a RV that is parked at the subject property.

Complainant has physical disabilities which affect her mobility and ability to conduct day to day housekeeping tasks, for which her healthcare provider recommended she secure a care worker.

News

This homeless solution was a costly disaster. What comes next for the RV camp?

A Bayview RV site was "by far the most expensive homeless response intervention."



Aaron Wilson said residents of the camp frequently clash with its staffers. | Benjamin Fanjoy for The Standard

Share ➔

By **Tomoki Chien**

Published Dec. 13, 2024 • 6:00am

Paul Reyes was finally getting his life together.

His spot at a city-funded RV site came with free food, laundry services, and therapy. He worked to tackle his drug addiction and felt ready to reenter the workforce for the first time in his 10 years of homelessness.

"All that's been derailed now," Reyes said.

City officials said last week they plan to close the Bayview Vehicle Triage, a safe-parking site whose three-year tenure has been marred by lawsuits, bitter



Ramona Mayon, who has lived at the site since August 2022, said one morning she found a dead mouse under her stove.

She said a mechanic told her mice had nested in her RV's engine compartment and may have damaged the vehicle's wiring. Photos viewed by The Standard show dead rodents strewn across the RV site.

Then there's the electricity problem.

The site, which opened in January 2022, didn't gain permanent power until Oct. 29 this year thanks to problems connecting it to the PG&E grid. That set the stage for a 2023 lawsuit in which a citizens group accused the city of running 16 unauthorized diesel generators at the site.

The Homelessness Department didn't answer questions about how much the city spent to electrify the site or what it plans to do with the property for the

4

remainder of the lease.

Meanwhile, Aaron Wilson, who has lived there since March, said there is daily friction between residents and the staff of Urban Alchemy, the nonprofit charged with running the site.

"It's a prison camp," Wilson said, referring to the fact that residents aren't allowed to have visitors.

Wilson and two other residents who spoke to The Standard referenced an instance in which a staffer appeared to mock a deaf resident during a heated exchange.

0:00

An Urban Alchemy employee appears to mock the laughter of a deaf RV resident. | Courtesy Andrew Kucharski

At one point, residents sought to form a tenants union to fight what they called "shameful" quality of life.

"Stop this communist regime that violates our BASIC HUMAN RIGHTS," one resident wrote in February, Bay City News reported.

"We have met all of the stated contract goals that the city asked of us at the Bayview Vehicle Transit Center," Urban Alchemy official Kirkpatrick Tyler said in an email. "In line with shelter best practices nationwide, we've adopted a no outside visitor policy to protect both the residents at the transit center and our staff."

But the biggest point of friction stems from the fact that the U.S. Department of

City officials originally envisioned a site offering 120 RV spots where residents could access showers, therapists, toilets, and electrical and sewage hookups for their vehicles. They wouldn't have to worry about getting ticketed, and the site would connect them with mechanics who'd fix their motor homes for free.

It'd be a place for homeless residents to regroup — and a way for the city to get scores of lumbering vehicles off Bayview streets.

But the city was never able to remove the "desired" number of RVs off the street "because the site capacity has been so much lower than originally planned," a spokesperson for the city's Homelessness Department wrote in an email.

City contracts viewed by The Standard note that the site couldn't reach capacity until it was fully electrified — which didn't happen until almost three years in.



The site has failed to meet its objectives over its nearly three-year tenure. | Benjamin Farjoy for The Standard

Just 31 people from the 132 households that have cycled through the site have entered long-term housing, temporary housing, or shelter, the Homeless Department spokesperson said.

The city will no longer make dedicated safe parking sites a central part of its homelessness strategy, the spokesperson added, given that "it has not proven to be as impactful as anticipated."

Still, the city is set to open an interim hosting site in the Bayview next year that will include 60 tiny homes and 20 RV spaces, bolstered by an \$8 million state grant. The Homelessness Department's director, Shireen McSpadden, has said people staying on the existing Bayview site likely won't be offered spots there.

"This is an open investigation, and we cannot comment further," a HUD spokesperson said in an email.

Hughs said Urban Alchemy removed the dog park and gazebo after she complained; the amenities were no longer at the site when The Standard visited this week.

"They told everybody, 'It's because the [American Disabilities Act] person can't use it,'" Hughs said of the staffers. "That's retaliation."



Residents have long clashed with the Urban Alchemy staffers who run the site. | Benjamin Fanjoy for The Standard

An Urban Alchemy employee at the site described residents who've complained about alleged mistreatment and ADA violations as "entitled" and "troublemakers."

"You're supposed to stay here for six months, get your shit together, then move on to the next," said the employee, who is not authorized to speak to the press and didn't want to be named. "They're just leeching off the resources and preventing others from using them. And then they complain that they're being forced to leave.

"Basically, you're just squatting in your mobile home on our property," the employee added.

The property is owned by the state of California.



OFFICE OF THE MAYOR
SAN FRANCISCO



LONDON N. BREED
MAYOR

Notice of Appointment

January 13, 2020

San Francisco Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2020 JAN 16 PM 2:55
W

Honorable Board of Supervisors:

Pursuant to Charter §3.100(18), of the City and County of San Francisco, I make the following appointment:

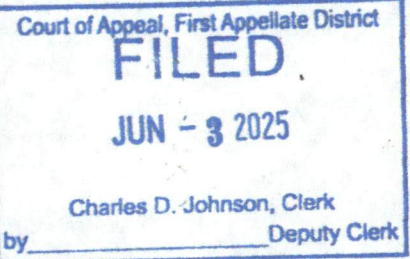
Lena Miller to Seat 3 of the Our City Our Home Oversight Committee for a three year term ending April 22, 2022.

I am confident that Ms. Miller will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696.

A handwritten signature in blue ink that reads "London Breed".

London N. Breed
Mayor



COURT OF APPEAL OF THE STATE OF CALIFORNIA
FIRST APPELLATE DISTRICT, DIVISION THREE

RAMONA MAYON

Case No. A171913

Plaintiff/Appellant

San Francisco Ct. CGC-24-611907

V.

LONDON BREED et al.,

Defendants/Respondents.

APPELLANT'S REPLY BRIEF

The Honorable Judge Richard B. Ulmer

Ramona Mayon (pro se)
1559 Sloat Blvd. Suite B-175
San Francisco, CA 94132
Phone: 415-595-6308
ramonamayon@yahoo.com



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Ramona Mayan (pro se) 1559 Gloat Blvd Suite B-175 TELEPHONE NO.: San Francisco FAX NO.: EA 94102 EMAIL ADDRESS: San Francisco ATTORNEY FOR (Name): 415-595-6308		FOR COURT USE ONLY FILED Superior Court of California County of San Francisco OCT 09 2025 CLERK OF THE COURT BY: Deputy Clerk	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 1559 Gloat Blvd MAILING ADDRESS: 450 McAllister CITY AND ZIP CODE: San Francisco CA 94102 BRANCH NAME:			
CASE NAME: Mayan v. Coalition on Homelessness; Jennifer Friedenback; LKCRST; ACLU; Urban Alchemy; Lena Miller			
CIVIL CASE COVER SHEET ☒ Unlimited (Amount demanded exceeds \$35,000) ☐ Limited (Amount demanded is \$35,000 or less)		Complex Case Designation ☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		CASE NUMBER: CGC-25-629986 JUDGE: _____ DEPT.: _____	

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- | | | |
|---|--|---|
| Auto Tort
☐ Auto (22)
☐ Uninsured motorist (46)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)
Non-PI/PD/WD (Other) Tort
☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☒ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)
Employment
☐ Wrongful termination (36)
☐ Other employment (15) | Contract
☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)
Real Property
☐ Eminent domain/Inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (26)
Unlawful Detainer
☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)
Judicial Review
☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39) | Provisionally Complex Civil Litigation
(Cal. Rules of Court, rules 3.400-3.403)
☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)
Enforcement of Judgment
☐ Enforcement of judgment (20)
Miscellaneous Civil Complaint
☐ RICO (27)
☐ Other complaint (not specified above) (42)
Miscellaneous Civil Petition
☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43) |
|---|--|---|
2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. ☐ Large number of separately represented parties
b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. ☐ Substantial amount of documentary evidence | d. ☐ Large number of witnesses
e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. ☐ Substantial postjudgment judicial supervision |
|--|--|
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): **5**
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
- Date: **10/9/2025**

Ramona Mayan
 (TYPE OR PRINT NAME)

Ramona Mayan
 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (not asbestos or toxic/environmental) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (not unlawful detainer or wrongful eviction)
Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally complex) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (non-domestic relations)
Sister State Judgment
Administrative Agency Award (not unpaid taxes)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (not specified above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-harassment)
Mechanics Lien
Other Commercial Complaint Case (non-tort/non-complex)
Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (not specified above) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition