

## **REDUCING CRIME IN THE MARAVILLA PUBLIC HOUSING SITE SUMMARY**

In the late 1980's, crime in the Maravilla public housing site skyrocketed due to gang activity among other factors. The Los Angeles County Sheriff's Department (LASD) and the Housing Authority of the County of Los Angeles (HACoLA) embarked on an ambitious partnership to initiate a Community Policing Program (CPP). Public housing presented challenges for law enforcement to address crime and nuisance issues in a densely populated environment where families were affected by many socio-economic factors. Public housing, commonly referred to as the "projects", comes with several perceptions including a common misplaced mistrust between residents and law enforcement.

In 1989, HACoLA identified Part I felony violent, property and drug crimes as significant problems impacting the Maravilla public housing site. Informal methods used to analyze the Maravilla crime problems included observations by HACoLA's management and maintenance staff, as well as information shared with them through fearful residents. This intelligence gathered by HACoLA management was added to the data set. The monthly Resident Council community meetings were another source of information. The formal method used to analyze data and corroborate intelligence was from LASD crime reports, which identified high levels of personal, property and drug-related crime.

The primary goal for LASD and HACoLA was an overall reduction in violent, property and drug crimes based on the response. In addition to information about the crime problem, the analysis demonstrated the need for the

guardians, LASD and HACoLA, to work collaboratively in order to effectively address Maravilla's crime problem. LASD also recognized the need to further involve other criminal justice partners including the District Attorney, Probation and Parole Departments. It also became clear that if crime was going to be impacted, HACoLA's property management and eviction policies and processes also needed to be improved. Ultimately, the strong partnership between LASD and HACoLA resulted in significant changes that improved the overall quality of life for Maravilla residents.

The documented reduction in crime suggests a strong association between the implementation of CPP efforts, coupled with the policy modifications by HACoLA. Furthermore, that the reduction has been sustained over a 20-year period of time with no significant confounding factors identified during that period, further strengthens the conclusion that the CPP efforts have been and continue to be an effective strategy to reduce crime.

## **REDUCING CRIME IN THE MARAVILLA PUBLIC HOUSING SITE**

### **SCANNING**

The Maravilla public housing site is located in unincorporated East Los Angeles County and managed by the Housing Authority of the County of Los Angeles (HACoLA). There are 504 units of public housing with 150 units dedicated for senior and disabled residents. The population of approximately 1500 residents includes 170 senior and disabled, 525 adults, 160 transition-age young adults (ages 19-25), and more than 600 children/youth who comprise 46% of the resident population.

The housing site and surrounding community have a long history of crime and related gang violence. Within the larger community, there are 17 gangs with approximately 1500 members. Maravilla housing has three primary gangs with more than 100 members.

In 1989, the Housing Authority of the County of Los Angeles (HACoLA), identified Part I felony violent, property and drug crimes as significant problems impacting the Maravilla public housing site. Overshadowing the criminal activity was the presence of two relatively large gangs, as well as a tagger group desirous of associating with the larger gangs. Gang members committed a significant percentage of the crimes, many of them assault crimes that left community residents in fear.

On a weekly basis, residents of the housing community reported victimization and intimidation by drug dealers and gang members to HACoLA site

management. Because residents were afraid of retaliation, they often did not report criminal incidents to law enforcement. Many of these incidents were reported at a later time to HACoLA management. This same fear, at times, led many residents to provide limited information about the suspects, crimes and locations of occurrence.

Compounding the situation was the fact that LASD and HACoLA were two separate agencies that operated with different missions and information sharing between LASD and HACoLA was limited at best. This hampered LASD's ability to provide problem-specific patrol efforts to eliminate crime locations within the site and slowed HACoLA's efforts to conduct evictions in a timely manner.

As mentioned before, the problems affecting the community were violent, property and drug crimes. In viewing the Maravilla site through the lens of the problem analysis triangle, it was learned that the primary targets/victims were residents, the suspects were most often gang members who resided at the site or were guests of residents, and the locations of occurrence were throughout the housing site. Areas where the efforts of the guardians, LASD and HACoLA, could improve were identified.

## **ANALYSIS**

The initial informal methods used to analyze the Maravilla crime problems included observations and documentation by HACoLA staff, in particular management and maintenance who worked in the community on a daily basis. The intelligence coming from fearful residents to HACoLA management was added to the data set. The monthly Resident Council community meetings were

another source of information about residents' particular concerns and crime locations. The formal method used to analyze data was from LASD crime reports for three previous years that identified high levels of personal, property and drug-related crime. (Attachment A)

The motivation behind the drug sales, as well as most of the robberies and property crimes was economic and tied to intimidation by the Maravilla gangs to control the site. The extensive graffiti/vandalism was a way for the gangs to establish their turf and influence in the community. The end result was a high level of crime and a community held hostage by fear of retaliation if they reported *any information* to HACoLA management or LASD.

Additional analysis of the suspects involved identified them as primarily Maravilla residents, or their guests. LASD identified those who were on Probation or Parole and checked their conditions. Any of those persons who used Maravilla apartments as their residence of record, but were not on lease agreements were identified as non-residents. The indication that the non-residents was possibly unauthorized and on Probation or Parole could be a violation and some enforcement action could be taken.

An underlying condition that precipitated the problem was the harsh economic conditions of Maravilla public housing residents. Prior to the start of the CPP program, as well as today, approximately 75% of the families are headed by a single female. Over 30% of the households report wages, but many work at low-paying jobs. Over 80% of the households make less than \$30,000 a

year to support a family. For some residents, the illegal income through drug sales and other crimes helped sustain their families in the early years. There were limited educational and employment opportunities for residents. The family and generational ties within the gangs, was another underlying cause that contributed to the crime problems at Maravilla.

The analysis also identified others impacted by the crime and social issues. First, there were numerous calls for service to LASD, so this was a drain on law enforcement resources. Initially, HACoLA did not have the resources to address the crime effectively, so the problem continued. Maravilla also had a negative reputation regarding crime and gangs, so that impacted the vacancy rate at the site impacting HACoLA's funding. In addition, Maravilla residents as a whole were stigmatized by the community-at-large.

Data for the longitudinal analysis were derived from a number of primary and secondary sources. Specifically, primary data was derived from HACoLA's on-going *20-year Resident Satisfaction and Safety Survey*, which is a 45-minute face-to-face interview conducted among 25% of the Maravilla residents by a contracted research company. Another primary source has been several resident surveys conducted over the years by the CPP Teams. Secondary data was drawn directly from LASD's databases and from crime analyses that were conducted jointly with HACoLA or independently by LASD.

Statistical analysis conducted included longitudinal descriptive, trend and comparative analysis. Results from these analyses are presented herein.

The analyses conducted suggest a strong association between the implementation of CPP efforts, coupled with the policy modifications by HACoLA and the reduction of criminal activity at the Maravilla public housing site over a significant period of time. Furthermore, that the reduction has been sustained over a 20-year period of time with no other confounding factors identified during that period, further strengthens the hypothesis that the CPP efforts have been and continue to be an effective strategy to reduce crime.

Criminal activity at Maravilla was, and remains multifaceted in nature, and in response LASD and HACoLA have also adopted a multifaceted approach to its resolution. Further, our experience indicated that the criminal activity we encountered at the Maravilla site exhibited both familial and multi-generational components. Drug dealers, for example, involved other family members in their enterprise, and as such our efforts were directed accordingly. Additionally, our crime analyses over the years have also led us to the recognition that it is only a limited number of individuals within the housing development that accounts for the majority of the crimes that are committed. To that extent, LASD, HACoLA and their law enforcement partners have made every attempt to identify, prosecute and evict these individuals.

Another insight that was brought forth by the analysis was the fact that the level of crime committed within the Maravilla housing site, is directly related to the level of effort and resources directed towards preventing it. Such effort must also be maintained over a long period of time in order to maximize the benefits

and be more effective in reducing crime. To the extent that the efforts are not sustained programmatically and financially, the level of crime begins to increase.

Prior to the implementation of the targeted LASD and HACoLA efforts at Maravilla, many problems were addressed in a reactive manner. At times, the response was not data-driven or targeted, and not best approach for seeking a long-term solution. What resulted was a high level of crime and a community in fear.

## **RESPONSE**

The primary goal for the LASD and HACoLA response was an overall reduction in violent, property and drug crimes. In addition to information about the crime problem, the analysis demonstrated the need for the guardians, LASD and HACoLA, to work collaboratively in order to effectively address Maravilla's crime problems. LASD also recognized the need to further involve other criminal justice partners including the District Attorney's Office, Probation and Parole Departments, and other local law enforcement agencies. It also became clear that if crime was going to be impacted, HACoLA's property management and eviction policies and processes also needed to be improved.

A Maravilla Task Force was formed that included the LASD Narcotics and Gang units, East Los Angeles Station patrol, the District Attorney's Office, Probation and Parole Departments, HACoLA management, the HACoLA eviction attorney, and eventually the CPP Team. The group met monthly to exchange information about the previous month's crime incidents (reported and unreported)

with details regarding the victims, suspects, locations and other data to determine any pattern. HACoLA also reported on their eviction actions following LASD operations and the need for any other information from LASD narcotics, gang and patrol personnel to move an eviction forward. With the combined information, specific strategies were planned, including but not limited to, surveillance operations, search warrants, and Probation and Parole searches.

With the award of a U.S. Department of Housing and Urban Development (HUD) Public Housing Drug Elimination Program grant to HACoLA in 1990, there were contract resources available to support overtime operations by LASD Narcotics and Gang units, as well as the development of CPP. The CPP was comprised of a dedicated team of two deputies selected by LASD and HACoLA. They were immediately trained in Problem Oriented Policing (POP) and became familiar with the HACoLA lease conditions, civil procedures, and crime prevention/intervention programs. The CPP Team developed a sense of ownership and responsibility for crime at the Maravilla site. They gathered additional data and other intelligence to implement a variety of POP projects over the years. Examples of POP projects included loitering, gang investigations utilizing social networks, and burglary.

To address the problem of two agencies that operated with different missions, weekly meetings between the CPP Team and HACoLA site management were initiated to ensure a constant flow of crime information which included all LASD calls for services and arrests in the Maravilla site and HACoLA information from residents about crimes and who was responsible. The

partnership between the two agencies evolved and is at the core of this successful CPP effort today. The CPP and HACoLA are integrated into the daily management of the site and serve as a “best practice” for all housing authorities and law enforcement agencies.

HACoLA management also responded by revising the public housing lease to include additional sections for violent, assault and drug crime. Specifically, the revision stipulated that a resident or guest engaged in violent or drug crime would receive a 3-day eviction notice for such activity and are not entitled to use the grievance procedure. (Attachment B). In conjunction with LASD, HACoLA developed a Housing Violation Form (HVF) that was used to identify and document the most frequent lease offenders and offenses observed by the CPP Team. (Attachment C) When an HVF was issued, it was similar to a motor vehicle violation ticket so the resident was advised as was HACoLA management for appropriate follow-up. To date, the HVF remains one of the most effective tools the CPP has used to impact crime and behavior at the Maravilla housing site. It is a conduit for information and action and allows LASD and HACoLA to hold the Maravilla residents accountable.

After the impact of LASD and other agency operations, many of the problem residents were evicted and non-resident suspects were arrested. Even after eviction or arrest, it was noted that some non-residents returned to Maravilla due to family and gang ties. While there, they continued to engage in criminal activity, so LASD and HACoLA instituted two policies and procedures for use by the CPP Team.

One new HACoLA strategy was a banning policy that not only prevented the criminal from returning to Maravilla for a year, but the residents inviting or harboring the banned non-resident were warned that they were also subject to eviction. (Attachment D)

An additional curfew policy was developed and enforced as part of the lease. The curfew policy states no minor under the age of 18 can be in the common areas of Maravilla between 10:00pm-6:00am and from 8:30am-1:30pm when school is in session. This policy had a direct effect on the young gang members and others loitering at the site to engage in drug sales/use. (Attachment E)

Three other law enforcement tools were developed to support the efforts of the CPP. A permanent 602 trespass enforcement authorization was included in the LASD contract with HACoLA, and a trespass warning form was prepared to bolster documentation for prosecutions (Attachment F). Through the efforts of the Maravilla Task Force, Probation and Parole stay-away conditions were also used to keep criminals away from the housing site. The CPP Team also engaged youth, adults and seniors through crime prevention and intervention activities. The events built relationships and trust between LASD and the public housing community that resulted in sharing of information about crime and further identification of other problematic person(s) or location(s).

Finally, HACoLA management addressed the need for improved security at the site. Target hardening included more secure entry doors and locks at each housing unit to address property crime concerns. A CCTV system was also

strategically installed throughout the Maravilla housing site and the CPP Team was provided a laptop for remote surveillance operations.

The crime reduction realized during the initial years of the CPP at Maravilla supported replication and expansion to the other HACoLA sites in Los Angeles County. The CPP Task Force continues to meet monthly, the weekly CPP Team and HACoLA management meetings are ongoing, and CPP Teams engage in problem-oriented policing in response to new problems and to sustain the impact that the program has demonstrated over the years.

## **ASSESSMENT**

The following information addresses the crime impact of the CPP in Maravilla public housing site over time as compared to crime occurring in the surrounding community. As was previously stated, the data suggests a strong association between the implementation of CPP efforts and the policy modifications by HACoLA, and the reduction of criminal activities at the Maravilla public housing site over a significant period to time.

Data and crime analysis over the years have revealed that there is a direct relationship between the level of crime, the number of residents who are victims of crime, the level to which they report a crime and their perceived level of safety (Attachment G). With regards to the level of crime and the number of residents who were victims of crime, the analysis and subsequent graph clearly illustrate that when crime at Maravilla was at its highest level in 1992 (225 incidents), before CPP was implemented, the percentage of residents who were victims of

crime were also at its highest point (42%). Furthermore, when crime was at its lowest point in 2010 (35 incidents) primarily as a result of CPP working in conjunction with HACoLA management, the percentage of residents who were victim of crime was also at a low point (11%).

Regarding crime and the level to which residents who were victims reported it, data collected since 2001 and identified in Attachment G, illustrates that, in general, when the reporting of crime by residents who are victims is up, criminal activity is reduced. Data collected since 1992 also revealed that when criminal activity is reduced, residents' sense of safety increased. For example, when criminal activity at the Maravilla housing development was at its highest point in 1992 (225 incidents), before CPP was implemented, residents reporting that they felt safe was at one of its lowest point (47%). Conversely, when criminal activity was at its lowest point in 2010, (35 incidents), residents reporting that they felt safe was at its highest point (94%) primarily as a result of partnership between the LASD CPP team and HACoLA.

To determine if any criminal factors within the broader community influenced the reduction of criminal activity within the Maravilla housing site, the Part I and II crimes in the East Los Angeles Sheriff's Station reporting districts were collected, graphed, and compared by an outsider evaluator. (Attachment H) To the extent that crime in both the reporting districts and at the Maravilla site were reduced over the years, the average rate of reduction at Maravilla was 4.33 (s.d .008) as compared to the East Los Angeles Sheriff's Station reporting

districts at 474.12 (s.d .780) and using a general linear model, test between group effect was significant at  $p=.02$ . Additionally, while the crime rate continued to decrease at the Maravilla public housing site after 2007, an increase is noted for the East Los Angeles Sheriff's Station reporting districts through 2009. This divergence could be attributed to the sustained effort of CPP within Maravilla despite the increasing number of crimes being perpetrated within the broader community. (Attachment I)

Given LASD's and HACoLA's desired goal of reducing assault and property crimes within the Maravilla housing site without displacing it into the surrounding community, analysis of the data over the 20-year period demonstrates that the goal has in fact been achieved and that there is no evidence of displacement. In addition, the reputation of the Maravilla public housing site has changed dramatically and the majority of residents are engaged and committed to sustaining the improved quality of life. However, the demonstrated impact can only be maintained if criminal activity is continually monitored and the collaborative partnership between LASD and HACoLA is sustained.

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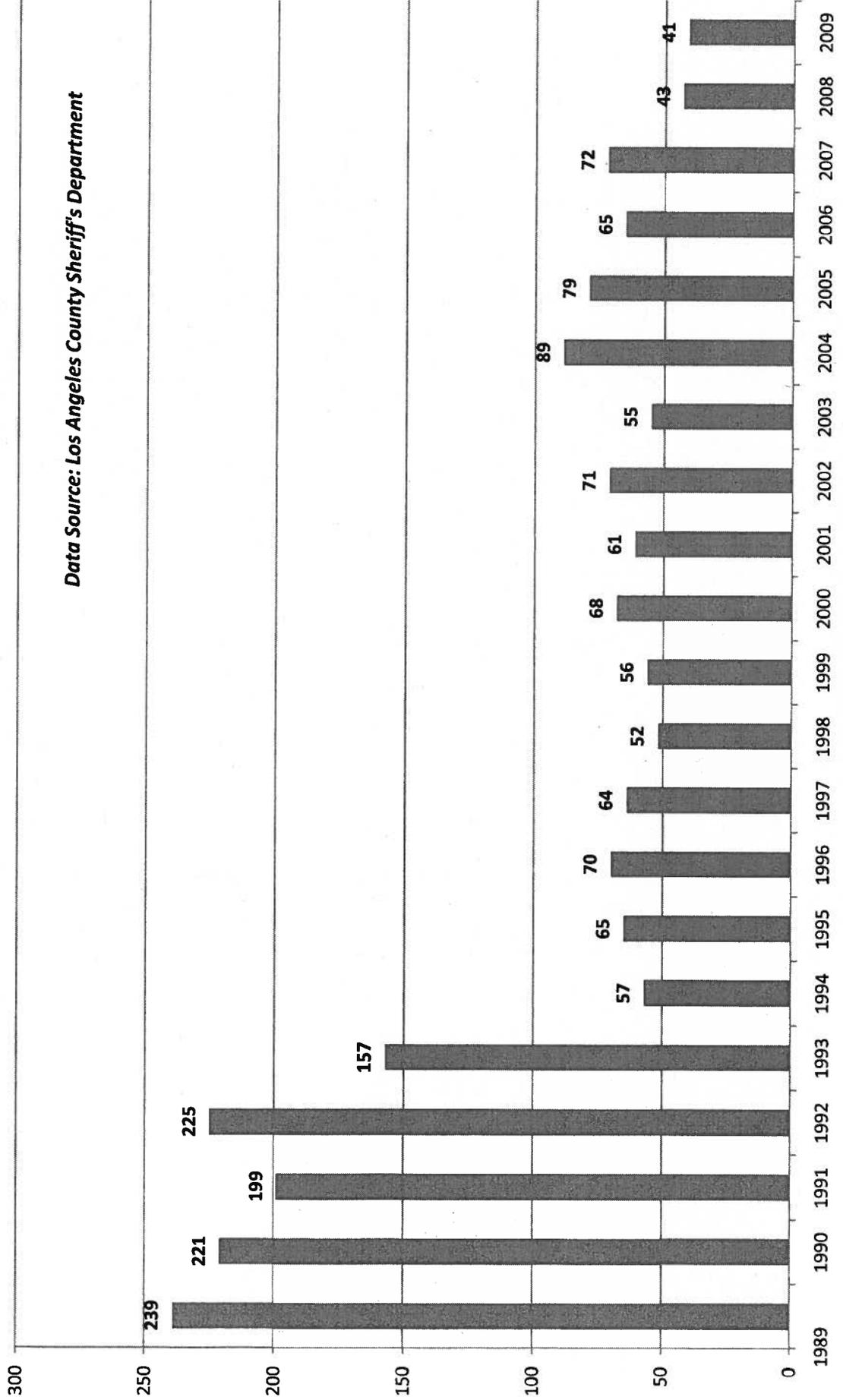
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## **ATTACHMENT A**

	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Personal	46	45	47	47	35	19	27	26	14	10	11	16	14	12	13	21	19	21	20	10	10
Property	99	93	116	56	61	31	30	36	41	20	32	42	36	32	25	40	36	29	31	19	18
Drug	94	82	36	122	61	7	8	8	9	22	13	10	11	27	17	28	24	15	21	14	13
<b>Total</b>	<b>239</b>	<b>221</b>	<b>199</b>	<b>225</b>	<b>157</b>	<b>57</b>	<b>65</b>	<b>70</b>	<b>64</b>	<b>52</b>	<b>56</b>	<b>68</b>	<b>61</b>	<b>71</b>	<b>55</b>	<b>89</b>	<b>79</b>	<b>65</b>	<b>72</b>	<b>43</b>	<b>41</b>

## Reported Crime at the Nueva Maravilla Housing Development 1989 - 2009



## **ATTACHMENT B**

**6. RESIDENT'S OBLIGATIONS**

Violation of this section may result in termination of this Lease Agreement. Resident agrees:

- A. To refrain from, and to assure that household members and guests refrain from creating or maintaining a threat to the health and safety of other Residents, Management's employees, or the public, or engaging in illegal or offensive behavior, including but not limited to: (i) committing a crime that subjects a Resident or any household member to a lifetime sex offender registration requirement imposed by any State sex offender registration program; (ii) being in possession of an unregistered or illegal gun or other firearm; (iii) shooting guns or other firearm; (iv) threatening others with a gun or other firearm, knives or weapons; (v) verbal threats of criminal activity; or (vi) lighting, exploding, storing or possessing firecrackers, explosives or flammable or combustible materials or fluids. Resident understands and acknowledges that committing any of the acts described in this subparagraph (A) is a material breach of this Lease and that Management may proceed with termination of the Lease for any such violation on three (3) day's notice.

\_\_\_\_\_ Resident's Initials

- B. To refrain from and to assure household members and guests refrain from engaging in drug-related criminal activity on or off the Housing Development premises. Resident expressly acknowledges and agrees that the illegal manufacture, sale, distribution or use of, or possession with the intent to manufacture, sell, distribute or use, a controlled substance is a drug-related criminal activity. Resident further expressly acknowledges and agrees being on or off the Housing Development premises and having a controlled substance in his/her system is in violation of this subparagraph (B). Resident understands and acknowledges that committing any of the above acts described in this subparagraph (B) is a material breach of this Lease, and that Management may proceed with termination of the Lease for any such violation on three (3) day's notice.

\_\_\_\_\_ Resident's Initials

- C. To refrain from and to assure household members and guests refrain from engaging in violent criminal activity on or off the Housing Development premises. Resident expressly acknowledges and agrees that the commission of such violent criminal activity creates a threat to the health and safety of other Residents, Management's employees, and the public. A violation of this subparagraph (C) is a material breach of this Lease, and Management may proceed with termination of the Lease for any such violation on three (3) day's

notice.

\_\_\_\_\_ Resident's Initials

- D. To refrain from and to assure household members and guests refrain from abusing alcohol in a way that interferes with the right to peaceful enjoyment of the Housing Development by other Residents.

\_\_\_\_\_ Resident's Initials

- E. To refrain from and to assure household members and guests refrain from illegal or other activity which impairs the physical or social environment of the Housing Development.
- F. To conduct himself/herself and to assure household members and guests conduct themselves in a manner that will not disturb his/her neighbors peaceful enjoyment of their residences and the public areas, and will be conducive to maintaining the Housing Development in a decent, safe and sanitary condition.

## **ATTACHMENT C**

**LOS ANGELES COUNTY  
HOUSING AUTHORITY  
NOTICE OF VIOLATION**

159456

Date/Time of Incident: \_\_\_\_\_ Site: \_\_\_\_\_

Date Issued: \_\_\_\_\_ Team: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_

CDL/ID #: \_\_\_\_\_

Resident/HOH: Name: \_\_\_\_\_

Building/Unit: \_\_\_\_\_

Relationship to HOH/UNIT: \_\_\_\_\_

**-VIOLATIONS - VIOLACIONES -**

- |   |  |
|---|--|
| 1. <input type="checkbox"/> Unauthorized household members<br><input type="checkbox"/> Miembros en hogar sin autorización | 10. <input type="checkbox"/> Unsafe/unsanitary conditions<br><input type="checkbox"/> Condiciones peligrosas/antihigiénicas                                  |
| 2. <input type="checkbox"/> Trespassing<br><input type="checkbox"/> Entrar ilegalmente                                    | 11. <input type="checkbox"/> Health violations<br><input type="checkbox"/> Violaciones de salud  |
| 3. <input type="checkbox"/> Loitering<br><input type="checkbox"/> Holgazanear   | 12. <input type="checkbox"/> Littering<br><input type="checkbox"/> Prohibido tirar basura  |
| 4. <input type="checkbox"/> Truancy<br><input type="checkbox"/> Falta a clases  | 13. <input type="checkbox"/> Animals<br><input type="checkbox"/> Animales  |
| 5. <input type="checkbox"/> Curfew<br><input type="checkbox"/> Toque de queda   | 14. <input type="checkbox"/> Vehicle maintenance/repair<br><input type="checkbox"/> Mantenimiento/Reparación de vehículos                                    |
| 6. <input type="checkbox"/> Unsupervised children<br><input type="checkbox"/> Niños sin supervisión                       | 15. <input type="checkbox"/> Parking<br><input type="checkbox"/> Estacionamiento   |
| 7. <input type="checkbox"/> Disturbing the peace<br><input type="checkbox"/> Molestando la paz                            | 16. <input type="checkbox"/> Interference with CDC staff and representatives<br><input type="checkbox"/> Interferencia con empleados de CDC y representantes |
| 8. <input type="checkbox"/> Drinking/Drunk in public<br><input type="checkbox"/> Bebiendo/intoxicado en público           | 17. <input type="checkbox"/> Other illegal activities (see narrative)<br><input type="checkbox"/> Otras actividades ilegales (vea el narrativo)              |
| 9. <input type="checkbox"/> Threats to resident<br><input type="checkbox"/> Amenanzas a residentes                        | 18. <input type="checkbox"/> Resource referral   |

Narrative/Narrativo: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Vehicle: \_\_\_\_\_ Plate: \_\_\_\_\_

Source:  OBS  Call

Incident/Report #: \_\_\_\_\_

Officer/Oficial: \_\_\_\_\_

NTCVIOLA (2/06)

## **ATTACHMENT D**

## Chapter 18

### BANNING POLICIES AND PROCEDURES

#### INTRODUCTION

The following are the policies and procedures governing the implementation, administration, and enforcement of the HA banning regulation.

#### A. DUTIES AND RESPONSIBILITIES

At the discretion of the Director of the Housing Management Division, the Property Supervisor shall have the primary responsibility for the implementation, administration and enforcement of the Banning Regulation as it pertains to their respective assigned housing development and scattered sites. Property Supervisors shall be responsible for notifying residents of persons banned from HA property.

Security personnel and law enforcement personnel contracted to provide services at the various housing developments shall participate in the enforcement of the Banning Regulation. Such enforcement may include properly identifying trespassers, issuing citations, and notifying the respective Property Supervisor of such violation.

Resident Managers shall, upon approval by the Director of the Housing Management Division, and at the discretion of the Property Supervisor, be responsible for identifying Banning violators, documenting violations by both residents and non-residents, and notifying the appropriate Property Supervisor of such violations.

#### B. BANNING REGULATION

A non-resident, including, but not limited to, a guest or visitor of a resident, may be banned for twelve (12) consecutive months if they commit two or more of the following acts in or upon any area of the HA development within a twelve (12) month period.

Any misdemeanor or infraction that disturbs the peaceful enjoyment of the development, including, without limitation, illegal drug activity or violent criminal activity;

Destruction of either HA property or private property;

After warning, continuing to interfere with the job responsibilities of a HA employee or vendor; and/or

After warning, continuing to disturb other residents' peaceful enjoyment of the complex.

The non-resident may be banned if they commit one misdemeanor or infraction involving possession of a controlled substance or one felony under state or federal law in or upon any area of the HA development including without limitation, illegal drug activity or violent criminal activity.

The HA development includes, but is not limited to, a private road or curb area, sidewalk, parking lot, alley, park grounds, playground, basketball court, hallway, stairway, laundry or recreational room, community center, or other common area grounds, place, building or vacant lot on HA property.

If a non-resident violates paragraph 1 above, he or she can be served with a banning notice excluding the non-resident from the HA development for twelve (12) consecutive months. At the time the non-resident is served, he or she will be requested to sign a form acknowledging receipt of the banning notice. A proof of service form indicating service of the banning notice on the non-resident shall be completed. A form documenting the incidents leading to the service of the banning notice shall also be completed.

Residents known to associate with the banned non-resident shall receive notice of the person banned from HA property in the form of a letter from the HA. The letter will also state that pursuant to the resident's Lease Agreement, the resident, or member of the resident's household, shall not allow the person who has been excluded to be a guest of the resident in the HA development.

A list of banned non-residents will be distributed to HA management and staff, security personnel and law enforcement, as appropriate.

If a banned non-resident comes on the HA development, he or she may be cited for trespass.

If the banned non-resident comes on the HA development with a resident who has received notice of the person's banned status, the resident will receive a lease violation. If the resident has not received notice, the resident will be provided notice and warned about future activities with the banned non-resident.

Pursuant to the Banning Policies and Procedures, a resident receiving a lease violation for violating this regulation will have his or her historical file reviewed to determine the subsequent course of action.

#### C. BREACH OF THE LEASE

One violation of the Banning Regulation by any household member of a unit shall constitute a minor breach of the Lease Agreement. Three or more violations of the Banning Regulation within a 12-month period of time by any household member (in any combination) shall constitute a material breach of the Lease Agreement, and shall be sufficient grounds for termination of the Lease Agreement.

#### D. NOTICES AND RECOMMENDATIONS

Once a resident is notified, in writing, of a non-resident being banned from the HA's property, the resident is deemed to have been put on notice that pursuant to their Lease Agreement they are prohibited from allowing a person who has been banned from HA property to be a guest of the resident at the housing development. If a resident is observed associating with a banned non-resident on the housing development, he or she will be cited for a lease violation.

First Violation: Written notice shall be served on the head of household, by the HA, advising of the lease violation. The notice shall constitute a WARNING to the head of household that subsequent violations may result in termination of the Lease Agreement.

Second Violation: Written notice of a second lease violation shall be served on the head of household and shall provide an opportunity for counseling for the head of household and household members. The Property Supervisor shall schedule an appointment for said counseling with ten (10) days of the second violation notice.

Third Violation: Written notice of a third lease violation shall be served on the head of household and the appropriate remedy shall be enforced as set forth below.

More Than Three Violations: A Thirty-Day Notice to Quit will be served on the head of household if more than three violations are issued within a twelve (12) month period.

#### E. REMEDIES

##### Review of the Resident File

When a household member or members have been cited three times within a 12-month period for violating the Banning Regulation, the Property Supervisor shall conduct a review of the resident's file to determine the overall resident record. Based on such review, one of the following actions shall be taken:

1. Recommendation for Referral: The Property Supervisor shall offer a referral to counseling, if available, to a family in lieu of an eviction notice. Such option is available only if within the last 12 months preceding the third violation, the resident or household members have not received three (3) or more of any combination of the following:

14-Day Notice

Notice to Comply

Notice to Pay Maintenance Charges

Counseling for Disturbing Neighbors

Counseling for any lease violation(s)

30-Day Notice to Cure or Quit

2. Thirty-Day Notice to Quit: If the head of household and/or members of household should fail to complete counseling sessions, or have received three (3) or more of the aforementioned notices, the Property Supervisor shall serve a Thirty-Day Notice to Quit based on the violations and if appropriate, other violations of the lease.

F. ENFORCEMENT

Security Personnel/Law Enforcement

Security personnel and law enforcement personnel contracted to provide services at the various housing developments shall participate in the enforcement of the Banning Regulation. Such enforcement shall include:

1. Violation Recognition: Should security/law enforcement officers observe a non-resident banned from the housing development in or about the HA complex, said officers shall have the authority to inquire of the individual(s) as to their identity, whether they are guest(s) of a resident, and their reason(s) for being on the property. The purpose of this inquiry is to determine whether a resident is subject to a lease violation, or a non-resident is subject to a trespass citation.
2. Citing Violations: Upon determining that an individual or individuals is in violation of the Banning Regulation, the security/law enforcement officer may so inform the resident and/or non-resident of the violation. The officer may then issue a written citation. One copy of the citation shall be filed with the Property Supervisor for the development, and the security/law enforcement officer shall maintain a copy.

G. ENFORCEMENT BY RESIDENT MANAGERS

Resident Managers shall participate in the enforcement of the Banning Regulation by observing and reporting. Should Resident Managers observe a resident in violation of the Banning Regulation, the incident should be immediately documented, including the date, time, location, person's name (if known), and number of times the person has been observed in violation of the Banning Regulation. Such documentation should be recorded in the resident's file and a memorandum concerning the Banning Violation(s) send to the Property Supervisor.

H. ENFORCEMENT BY MANAGEMENT

Area Managers and Property Supervisors shall have the authority to serve citations for violations of the Banning Regulation.

I. GRIEVANCE PROCEDURE

HA residents shall have the right to file a grievance in response to actions taken by the HA concerning issuance of a Banning Notice or violations of the Banning Regulation.

The HA Grievance Procedure is subject to the Code of Federal Regulations, Title 24, Part 966, revised as of April 1, 1985, and as further amended. Residents shall follow the grievance procedures as set forth in the ACOP.

## **ATTACHMENT E**

Excerpt from HACoLA Admissions and Continued Occupancy Policy (ACOP)

## Chapter 17

### HA CURFEW AND LOITERING POLICIES AND PROCEDURES

#### INTRODUCTION

The following are the policies and procedures governing the implementation, administration, and enforcement of the HA Curfew and Loitering Regulations.

#### A. DUTIES AND RESPONSIBILITIES

At the discretion of the Director of the Housing Management Division, the Property Supervisors shall have the primary responsibility for implementation, administration and enforcement of the Curfew and Loitering Regulations as it pertains to their respective assigned housing developments and scattered sites.

Security personnel and law enforcement personnel contracted to provide services at the various housing developments shall participate in the enforcement of the Curfew and Loitering Regulations. Such enforcement may include properly identifying curfew and loitering violators, and notifying the appropriate Property Supervisor of such curfew and loitering violations.

#### B. NIGHTTIME CURFEW

No minor under the age of 18 years shall remain in or upon any common area of the HA or within any HA community, including but not limited to a road, curb area, sidewalk, parking lot, alley, park grounds, playground, basketball court, hallway, stairway, laundry, or recreational room, community center, or other common area grounds, place, building or vacant lot between the hours of 10:00 p.m. on any day and 6:00 a.m. of the immediately following day, except for within an apartment unit or private yard area.

“Remain” means to stay behind, to tarry and to stay unnecessarily in or upon HA common area, including the congregating of groups of persons, in whom any minor involved is not on or upon HA common area for the purpose of mere passage or going home.

A parent, guardian or other person having the legal care, custody or control of any minor (under the age of 18 years) shall not knowingly permit or by ineffective control allow the minor to violate this curfew regulation. The term “knowingly” includes knowledge that a parent or guardian should reasonably be expected to have concerning the whereabouts of a minor in that person’s legal custody. This requirement is intended to hold a neglectful or careless parent or guardian up to a reasonable community standard of parental responsibility.

It shall be no defense that a parent or guardian was indifferent to the activities or conduct or whereabouts of such minor.

The following shall constitute valid exceptions to the regulation:

1. When the minor is accompanied by his or her parent or parents, legal guardian or other person having the legal care or custody of the minor, or by his or her spouse 18 years of age or older; or
2. When the minor is on an errand or other legitimate business or activity directed by his or her parent or parents or legal guardian or other adult person having the legal care or custody of the minor, or by his or her spouse 18 years of age or older; or
3. When the minor is going directly to or returning directly home (without any unnecessary detour or stop), a public meeting, or activity of a religious or other voluntary association, a place of public entertainment such as a movie, play, sporting event, dance, school activity, or the minors place of employment; or
4. When the minor is actively participating in a sporting or community event on HA property, if the HA rules or regulations permit the sporting or community event during said hours; or
5. When the presence of such minor in said place or places is connected with or required with respect to a business, trade, profession, or occupation in which said minor is lawfully engaged; or
6. When minor is exercising First Amendment rights protected by the United States or California Constitution; or
7. When the minor is involved in an emergency or seeking medical assistance; or
8. When the minor is emancipated pursuant to law.

C. DAYTIME CURFEW

No minor (under the age of 18 years) who is subject to compulsory education or to compulsory continuing education shall remain in or upon any common area of the HA or within any HA community including, but not limited to, a road curb area, sidewalk, parking lot, alley, park grounds, playground, basketball court, hallway, stairway, laundry or recreational room, community center, or other common area grounds, place or building, vacant lot or parking lot, between the hours of 8:30 a.m. and 1:30 p.m. on days when school is in session. The following shall constitute valid exceptions to this regulation:

1. When the minor is accompanied by his or her parent or parents, legal guardian or other adult person having the legal care or custody of the minor, or by his or her spouse 18 years of age or older; or
2. When the minor is upon an emergency errand directed by his or her parent or parents, legal guardian or other adult person having the legal care or custody of the minor, or by his or her spouse 18 years of age or older; or
3. When the minor is going directly to or returning directly home from, without any unnecessary detour or stop, his or her place of gainful employment or a medical, dental,

optometry, or chiropractic appointment; or

4. When the minor has permission to leave school campus for lunch or school related activity and has in his or her possession a valid, school issued, off-campus permit; or
5. When the minor has in his or her possession a written excuse from the minors parent(s), legal guardian, or other adult person having the legal care or custody of the minor; or
6. When the minor is receiving instruction by a qualified tutor pursuant to Education Code Section 48224; or
7. When the minor is going to or returning directly from, without unnecessary detour or stop, a public meeting, or place of public entertainment, such as a movie, play, sporting event, dance or school activity, provided such meeting, event or activity is a school-approved activity for the minor or is otherwise supervised by school personnel of the minors school; or
8. When the minor is going to or returning directly from, without unnecessary detour or stop, an appearance in court, attendance at a funeral service, observance of a holiday or ceremony of his or her religion, attendance at religious retreats, or attendance at an employment conference; or
9. When the minor is emancipated pursuant to law.

#### D. LOITERING

No one will loiter in a common area of a housing site. A common area includes, but is not limited to a road, curb area, sidewalk, fire lane, parking lot, alley, park grounds, playground, basketball court, hallway, stairway, laundry, or recreational room, community center, or other common area grounds, place, building or vacant lot. This pertains to adults and minors.

“Loitering” is defined as when a person delays, lingers, idles or remains in an area and does not have a lawful purpose for being there.

#### E. BREACH OF THE LEASE

One violation of the Curfew Regulation by any household member of a unit shall constitute a minor breach of the Lease Agreement. Three or more violations of the Curfew Regulation within a 12-month period of time by any household member (in any combination) shall constitute a material breach of the Lease Agreement, and shall be sufficient grounds for termination of the Lease Agreement.

One violation of the Loitering Regulation by any household member of a unit or guest of the unit, shall constitute a minor breach of the Lease Agreement. Two or more violations of the Loitering Regulation within a 12-month period of time by any household member or guest (in any combination) shall constitute a material breach of the Lease Agreement, and shall be sufficient grounds for termination of the Lease Agreement.

F. NOTICES AND RECOMMENDATIONS

Notice

The Head of Household shall receive a copy of the citation for violation of the Curfew Regulation and written notification from HA management of each violation of the Curfew Regulation occurring within a 12-month period as follows:

First Violation: Written notice shall be served on Head of Household, by HA management, advising of curfew violation and that Head of Household is responsible for the minor's conduct. The notice shall constitute a WARNING to the Head of Household that subsequent violations may result in termination of the Lease Agreement.

Second Violation: Written notice of a second curfew violation shall be served on the Head of Household and shall provide an opportunity for counseling for the Head of Household and minor(s). The Property Supervisor should schedule the appointment for said counseling with ten (10) days of the second violation notice.

Third Violation: Written notice of third curfew violation shall be served on the Head of Household and the appropriate remedy shall be enforced as set forth below.

The Head of Household shall receive a copy of the citation for violation of the Loitering Regulation and written notification from HA management of each violation of the Loitering Regulation occurring within a 12-month period as follows:

First Violation: Written notice shall be served on Head of Household, by HA management, advising of loitering violation and that Head of Household is responsible for the household member or guests' conduct. The written notice shall also provide an opportunity for counseling for the Head of Household. The Property Supervisor should schedule the appointment for said counseling within ten (10) days of the notice. The notice shall constitute a WARNING to the Head of Household that subsequent violations may result in termination of the Lease Agreement.

Second Violation: Written notice of second loitering violation shall be served on the Head of Household and the appropriate remedy shall be enforced as set forth below.

G. REMEDIES

Review of Resident File

When a household member or members have been cited three times within a 12-month period for violating the Curfew or Loitering Regulations, the Property Supervisor shall conduct a review of the resident's historical file to determine the overall resident record. Based on such review, one of the following actions shall be taken:

Recommendation for Referral: The Property Supervisor shall offer a referral to counseling, if available, to a family in lieu of an eviction notice. Such option is available only if within the last 12 months preceding the third curfew or loitering violation the

resident or household members have not received three (3) or more of any combination of the following:

14-Day Notice

Notice to Comply

Notice to Pay Maintenance Charges

Counseling for Disturbing Neighbors

Counseling for any lease violation(s)

30-Day Notice to Cure or Quit

Thirty-Day Notice to Quit: If head of household and/or minor(s) should fail to complete referred sessions, or have received three (3) or more of the aforementioned notices, the Property Supervisor shall serve a Thirty-Day Notice to Quit based on the curfew or loitering violations and, if appropriate, other violations of the lease.

#### H. ENFORCEMENT

##### Security Personnel/Law Enforcement

Security personnel and law enforcement personnel contracted to provide services at the various housing developments shall participate in the enforcement of the Curfew and Loitering Regulations. Such enforcement shall include:

Violation Recognition: Should security/law enforcement officers observe a minor or minors in or about any common area of the HA developments between the hours of 10:00 p.m. and 6:00 a.m., said officers shall have the authority to inquire of the minor(s) as to their identity, whether they are residents of the housing development, and their reason(s) for being out during curfew hours. The purpose of the inquiry is to determine whether the minor(s) are in violation of the Curfew Regulation or whether any of the exceptions to the Curfew Regulation apply.

Should security/law enforcement officers observe anyone loitering in any common area of the HA developments, said officers shall have the authority to inquire of the person(s) as to their identity, whether they are residents of the housing development, and their reason(s) for being in the common area.

Citing Violations: Upon determining that a minor is in violation of the Curfew Regulation, the security/law enforcement officer may so inform the minor(s) of the violation. The officer may then issue a written citation. One copy of the citation shall be filed with the Property Supervisor for the development, and the security/law enforcement officer shall maintain a copy.

Upon determining that a person is in violation of the Loitering Regulation, the

security/law enforcement officer may so inform the person(s) of the violation. The officer may then issue a written citation. One copy of the citation shall be filed with the Property Supervisor for the development, and the security/law enforcement officer shall maintain a copy.

#### Enforcement by Resident Managers

Resident Managers shall participate in the enforcement of the Curfew Regulation by observing and reporting only. Should Resident Managers observe a minor or minors in violation of the Curfew Regulation the incident should be immediately documented, including the date, time, location, name of minor (if known), and number of times minor has been observed in violation of the Curfew Regulation. Such documentation should be recorded in the resident's file and a memorandum concerning the curfew violation(s) sent to the Property Supervisor.

Resident Managers shall participate in the enforcement of the Loitering Regulation by observing and reporting only. Should Resident Managers observe a person or persons in violation of the Loitering Regulation the incident should be immediately documented, including the date, time, location, name of person(s) (if known), and number of times person(s) has been observed in violation of the Loitering Regulation. Such documentation should be recorded in the resident's file and a memorandum concerning the loitering violation(s) sent to the Property Supervisor.

#### Enforcement by Management

Area Managers and Property Supervisors shall have the authority to serve citations for violations of the Curfew and Loitering Regulations.

### I GRIEVANCE PROCEDURE

Residents shall have the right to file a grievance in response to actions taken by the HA concerning violations of the Curfew and Loitering Regulations.

The HA Grievance Policy is subject to the Code of Federal Regulations, Title 24, Part 966, revised as of April 1, 1985, and as further amended. Residents shall follow the grievance procedures as set forth in the ACOP.

**ATTACHMENT F**

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT**  
**NUEVA MARAVILLA TRESPASS CONTACT REPORT-602 (o) PC**  
**4919 E. CESAR CHAVEZ AVENUE LOS ANGELES 90022**

NAME (LAST, FIRST, MIDDLE) STATE		DRIVER'S LICENSE #				
ADDRESS PHONE #			CITY			
D. O. B.	HEIGHT	SEX	WEIGHT	RACE	HAIR	EYES
GANG				AKA/MONIKER		
TATTOOS/SCARS/MARKS						
LOCATION CONTACTED				DATE/TIME		
VEHICLE DESCRIPTION						

**PENAL CODE SECTION 602 (o) STATES:**

(o) [Refusal to leave private property] Refusing or failing to leave land, real property, or structures belonging to or lawfully occupied by another and not open to the general public, upon being requested to leave by (1) a peace officer at the request of the owner, the owner's agent, or the person in lawful possession, and upon being informed by the peace officer that he or she is acting at the request of the owner, the owner's agent, or the person in lawful possession, or (2) the owner, the owner's agent, or the person in lawful possession. The owner, the owner's agent, or the person in lawful possession shall make a separate request to the peace officer on each occasion when the peace officer's assistance in dealing with a trespass is requested. However, a single request for a peace officer's assistance may be made to cover a limited period of time not to exceed 30 days and identified by specific dates, during which there is a fire hazard or the owner, owner's agent or person in lawful possession is absent from the premises or property. In addition, a single request for a peace officer's assistance may be made for a period not to exceed six months when the premises or property is closed to the public and posted as being closed. However, this subdivision shall not be applicable to persons engaged in lawful labor union activities which are permitted to be carried out on the property by the California Agricultural Labor Relations Act, Part 3.5 (commencing with Section 1140) of Division 2 of the Labor Code, or by the National Labor Relations Act. For purposes of this section, land, real property, or structures owned or operated by any housing authority for tenants as defined under Section 34213.5 of the Health and Safety Code constitutes property not open to the general public; however, this subdivision shall not apply to persons on the premises who are engaging in activities protected by the California or United States Constitution, or to persons who are on the premises at the request of a resident or management and who are not loitering or otherwise suspected of violating or actually violating any law or ordinance.

**WARNING: YOU ARE HEREBY WARNED THAT ANY LOITERING WITHIN NUEVA MARAVILLA HOUSING DEVELOPMENT WITHOUT LAWFUL PURPOSE IS TRESPASSING AND YOU ARE SUBJECT TO ARREST WITHOUT FURTHER WARNING.**

SIGNATURE \_\_\_\_\_

DATE \_\_\_\_\_

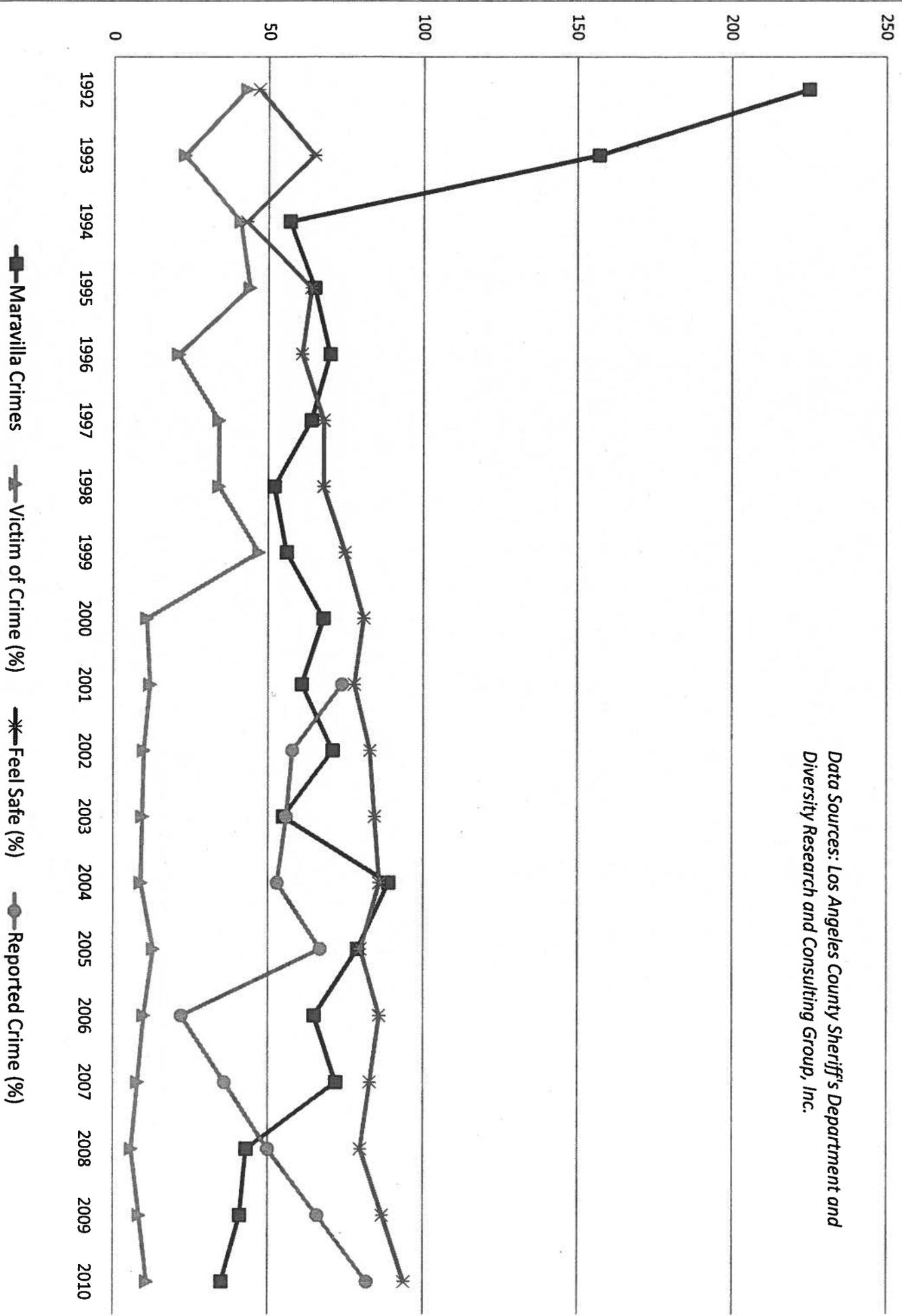
I GIVE MY CONSENT TO BE PHOTOGRAPHED Yes \_\_\_\_\_ No \_\_\_\_\_ SIGNATURE \_\_\_\_\_

DEPUTY \_\_\_\_\_

**ATTACHMENT G**

# Number of Reported Crimes, Percent of Residents Who Were Victims of Crime, Reported Crime, Felt Safe, and Reported Crimes at the Nueva Maravilla Housing Developments 1992 - 2010

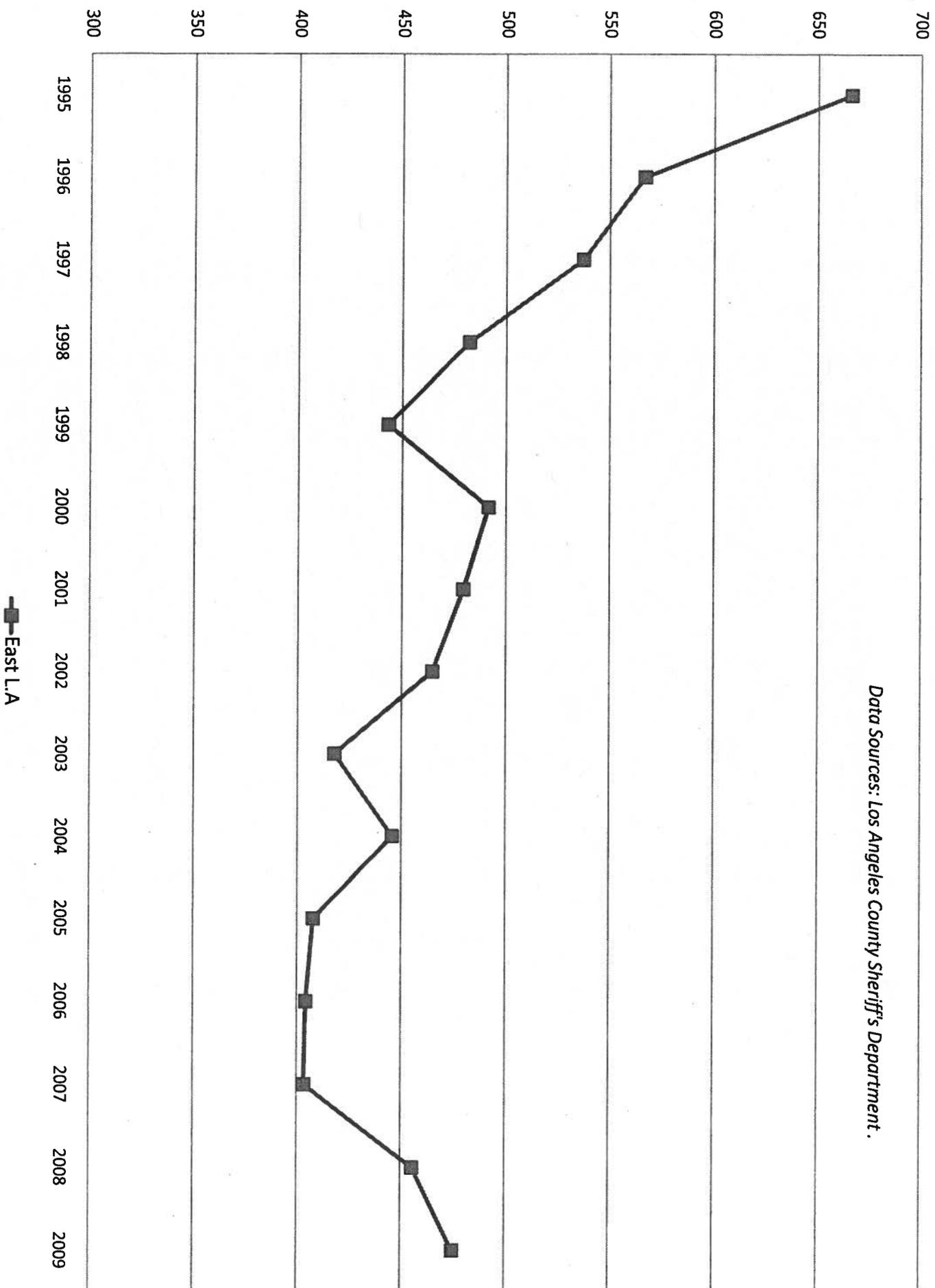
Data Sources: Los Angeles County Sheriff's Department and Diversity Research and Consulting Group, Inc.



## **ATTACHMENT H**

# Reported Crime Rates Per 10,000 in the East Los Angeles Sheriff's Station 1995 - 2009

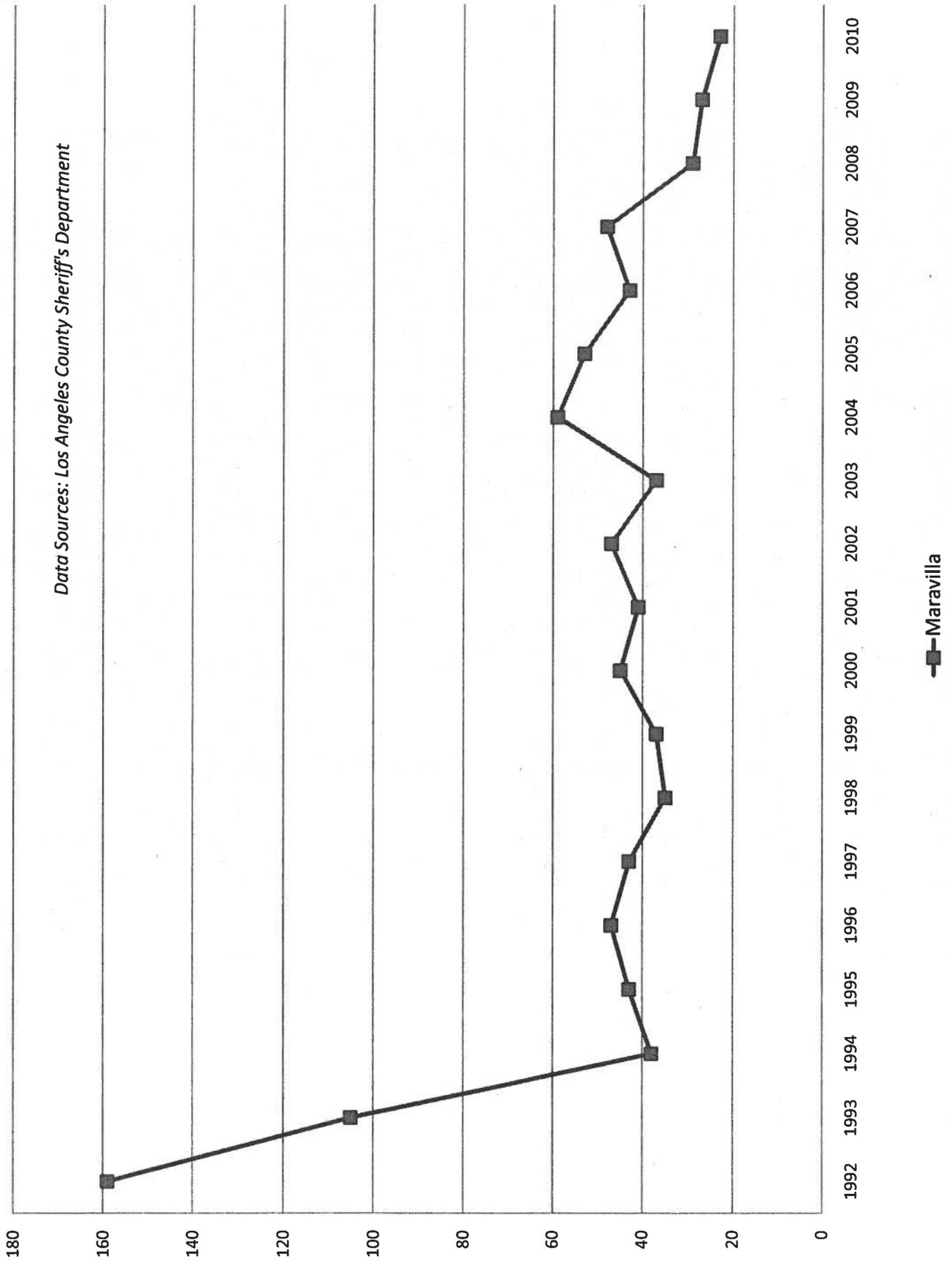
Data Sources: Los Angeles County Sheriff's Department.



## **ATTACHMENT I**

# Reported Crime Rates Per 10,000 at the Nueva Maravilla Housing Site 1992 - 2010

Data Sources: Los Angeles County Sheriff's Department



—■— Maravilla