

December 13, 2024

Esteban Rodriguez  
O'Melveny & Myers LLP  
400 South Hope Street Suite 1900  
Los Angeles, California 90071-2811

**SUBJECT: RESPONSE TO NOTICE OF APPEAL LOS ANGELES COUNTY  
PROBATION DEPARTMENT – LOS PADRINOS JUVENILE HALL**

Dear Mr. Rodriguez,

The Board of State and Community Correction is in receipt of the “Notice of Appeal” dated December 11, 2024. I understand that you will be filing a “letter brief and associated exhibits” in support of your clients’ appeal at a future date and within the deadlines set forth in Section 1314 of Title 15 of the California Code of Regulations. As such, I will not treat your letter as a first level appeal within the meaning of Section 1314. I would note, however, that one of the issues you raised deals with the denial of the county’s corrective action plans on October 11, 2024 and October 13, 2024. Because an appeal under Section 1314 “shall be filed within 30 calendar days of the notification of the action with which the county or city is dissatisfied,” I will not consider that issue once your appeal is filed.

You have also requested a “stay” of the enforcement of the October 14<sup>th</sup> Notice of Unsuitability pending appeal. The only basis to rescind the Board’s Notice of Unsuitability is for the county to remedy the conditions that rendered the facility unsuitable. (Welf. & Inst. Code, § 209, subd. (a)(4).) As noted in the detailed reinspection report from Field Representative Lisa Southwell, Los Padrinos remains out of compliance with the Board’s regulations regarding staffing (§ 1321). The probation department has had over 120 days to improve conditions at Los Padrinos since the initial inspection report was issued and the Welfare and Institutions Code does not provide for additional delays. Los Padrinos remains unsuitable for the confinement of juveniles.

Sincerely,



AARON R. MAGUIRE (A)  
Executive Director