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21
22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
23
24 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

25 HOLLYWOOD HILLS COMMUNITY
26 SAFETY COLLABORATIVE; DAVID
27 AGNEW; CYNTHIA COBB; ELAINE
28 ANDRAE CORRIGAN and LYNDEE
29 TIGERLILY ROSEN, a married couple;
30 MICHAEL DI GIROLAMO and CRAIG
31 YOUNG, a married couple; JAY GIBSON;
32 MAX MARTENS; and RODNEY RUSSELL,

33 Plaintiffs,

34 v.

35 CITY OF LOS ANGELES, a municipal entity;
36 KAREN BASS, in her official capacity as
37 mayor of LOS ANGELES; and NITHYA
38 RAMAN, in her official capacity as
councilmember from COUNCIL DISTRICT 4,

Defendants.

Case No.:

COMPLAINT FOR:

1. **Enjoinder of Public Nuisance (Civ. Code, §§ 3490 et seq.)**
2. **Enjoinder of Private Nuisance (Civ. Code, § 3501 et seq.)**

1 **COMPLAINT**

2 Plaintiffs Hollywood Hills Community Safety Collaborative (“HHCSC”), David Agnew,
3 Cynthia Cobb, Elaine Corrigan and Lyndee Rosen, Michael Di Girolamo and Craig Young, Jay
4 Gibson, Max Martens, and Rodney Russell (collectively, “Plaintiffs”), file this Complaint against
5 Defendants City of Los Angeles (the “City”), Karen Bass, in her official capacity, and Nithya
6 Raman, in her official capacity (collectively, “Defendants”), for injunctive relief and allege as
7 follows:

8 **INTRODUCTION**

9 1. This case is about whether the City of Los Angeles, when acting as a landowner,
10 must follow the same nuisance laws that any private landowner must follow, and whether it owes
11 an obligation to its citizens, enforceable by injunctive relief, to maintain its streets, parks, and other
12 rights of way free of obstructions, health hazards, fire risks, and other public nuisances so that the
13 residents may live in peace and safety in the City in which they pay taxes. The answer to both
14 questions is yes.

15 2. For over a decade, the City has allowed and even encouraged the streets, sidewalks,
16 and parks of Hollywoodland, Lake Hollywood Estates, and Hollywood Knolls (collectively,
17 “Hollywood Hills Neighborhoods”) to become a public nuisance. From these neighborhoods, and
18 particularly from Lake Hollywood Park and a nearby viewing site that City staff previously created,
19 tourists can view the famous Hollywood Sign (the “Sign”). As a result, the three neighborhoods
20 have become subject to crippling conditions that severely limit their residents’ ability to leave their
21 homes; to an unacceptable risk of devastating fire from which they are unlikely to escape; and to
22 illegal street vending, public urination and defecation, and related health hazards throughout the
23 neighborhoods and particularly at the neighborhood pocket park that has become a central viewing
24 spot for the Sign.

25 3. State law defines a public nuisance as “[a]nything which is injurious to health, . . . or
26 is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere
27 with the comfortable enjoyment of life or property, or unlawfully obstructs the free passage or use,
28 in the customary manner, of . . . any public park, square, street, or highway.” (Civ. Code, §§ 3479,

1 3480.) The conditions throughout the City's streets, sidewalks, and parks in the Hollywood Hills
2 Neighborhoods constitute nuisances because, among other things, they involve obstructions to the
3 free use of the residents' properties, routinely blocking ingress and egress, and obstructions to the
4 customary use of fire lanes; they are offensive to the senses, not only because of incessant honking
5 and vehicular noise, but also because the entire neighborhood has become a public toilet; they are
6 injurious to health because of the trash, illegal street vending and dumping, and public urination and
7 defecation that occur regularly on the City's property; and they constitute a fire hazard, including
8 but not limited to the constant and improper disposal of cigarettes in this high fire risk area, a risk
9 compounded greatly by the residents' inability to escape should a fire in fact ignite.

10 4. The City of Los Angeles is liable for the nuisance because it has taken active steps
11 to promote it at the expense of the residents of the Hollywood Hills Neighborhoods; because it owns
12 and controls the lands on which the nuisance conditions exist and consents to those conditions
13 through knowledge and acquiescence; and/or because it owns and controls the lands on which the
14 nuisance conditions exist and has failed to take reasonable, effective steps to prevent the nuisance.
15 (See Rest.2d Torts, § 838.)

16 **JURISDICTION AND VENUE**

17 5. Venue is proper in this Court pursuant to Code of Civil Procedure section 394
18 because Defendant City of Los Angeles is situated in this district. Venue is further proper in this
19 Court because the omission or commission of acts and violations of law by Defendants as alleged
20 in this Complaint occurred within the City and County of Los Angeles, State of California.

21 6. Jurisdiction is proper in this Court because Defendants have contributed to,
22 consented to, and/or failed to prevent a public nuisance in California. Plaintiffs have the right and
23 authority pursuant to Code of Civil Procedure section 731 to seek abatement of that nuisance. This
24 Court has jurisdiction over all causes of action asserted in this Complaint pursuant to California
25 Constitution, article VI, section 10, and Code of Civil Procedure section 410.10.

26 **PARTIES**

27 7. The Hollywood Hills Community Safety Collaborative is an unincorporated
28 association of residents in the Hollywood Hills Neighborhoods, with an address of 2699 ½ North

1 Beachwood Drive, Suite 520, Los Angeles, CA 90068. It represents the interests of approximately
2 100 residents who own or occupy homes in Hollywoodland, Lake Hollywood Estates, and
3 Hollywood Knolls, including each of the individual Plaintiffs named below. HHCSC brings this
4 action on behalf of those residents, whose interests in safe access to and enjoyment of their homes
5 are germane to HHCSC's purpose.

6 8. David Agnew resides in Hollywoodland, on Mulholland Highway where it meets the
7 Innsdale fire road.

8 9. Cynthia Cobb resides in Lake Hollywood Estates, on Arrowhead Drive one house
9 away from the corner with Canyon Lake Drive, mere feet from Lake Hollywood Park.

10 10. Elaine Andrae ("Andy") Corrigan and Lyndee Tigerlily ("Tiger") Rosen reside in
11 Lake Hollywood Estates on Tahoe Drive at the corner with Canyon Lake Drive, mere feet from
12 Lake Hollywood Park.

13 11. Michael Di Girolamo and Craig Young live in Hollywoodland, on Durand Drive at
14 its intersection with Mulholland Highway.

15 12. Jay Gibson lives in Hollywood Knolls, approximately 200 feet above Barham
16 Boulevard, at the intersection of La Suvida Drive and Primera Avenue, just above Lake Hollywood
17 Drive.

18 13. Max Martens resides in Hollywoodland, on Ledge wood Drive near the intersection
19 with Heather Drive.

20 14. Rodney Russell lives in Lake Hollywood Estates, on Canyon Lake Drive where it
21 intersects with both Arrowhead Drive and Tahoe Drive, right across from Lake Hollywood Park.

22 15. Defendant City of Los Angeles is a municipal entity in the County of Los Angeles
23 in the State of California.

24 16. Defendant Karen Bass is the Mayor of the City of Los Angeles. She is sued in her
25 official capacity. In her role as Mayor, Defendant Bass is ultimately responsible for the City's
26 creation of a nuisance, its consent to a nuisance, and/or its failure to take reasonable steps to prevent
27 a nuisance, as detailed in the Complaint.

28 ///

17. Defendant Nithya Raman is the councilmember for Council District (CD) 4, which includes the Hollywood Hills Neighborhoods. She is sued in her official capacity. In 2011, the office of the councilmember for CD 4 created one of the sites alleged to be a nuisance. In her role as Councilmember, Defendant Raman and/or her predecessors in office are responsible for the City's creation of a nuisance, its consent to a nuisance, and/or its failure to take reasonable steps to prevent a nuisance, as detailed in the Complaint.

FACTUAL ALLEGATIONS

Background

18. In 1923, the original “HOLLYWOODLAND” sign was erected by the Hollywoodland Real Estate Group with the purpose of attracting residents to a new, planned community in the rugged hills of what is now known as Hollywoodland.

19. Today, the communities of Hollywood Knolls, Lake Hollywood Estates, and Hollywoodland consist of approximately 1,500 homes that are connected by a series of narrow, winding streets.

20. Access to these three neighborhoods has always been limited, with only one street providing access on each side—a narrow, winding street through Hollywoodland up Beachwood Drive to Ledgewood Drive to Mulholland Highway; and a similar street through Hollywood Knolls up Lake Hollywood Drive.

21. The roads in these neighborhoods are generally without sidewalks, and even then average only about 18 feet in width.

22. Starting in the late 2000s, and particularly around 2013, Plaintiffs began witnessing a significant increase in tourist traffic through their neighborhoods as GPS devices enabled tourists to navigate the narrow and winding streets.

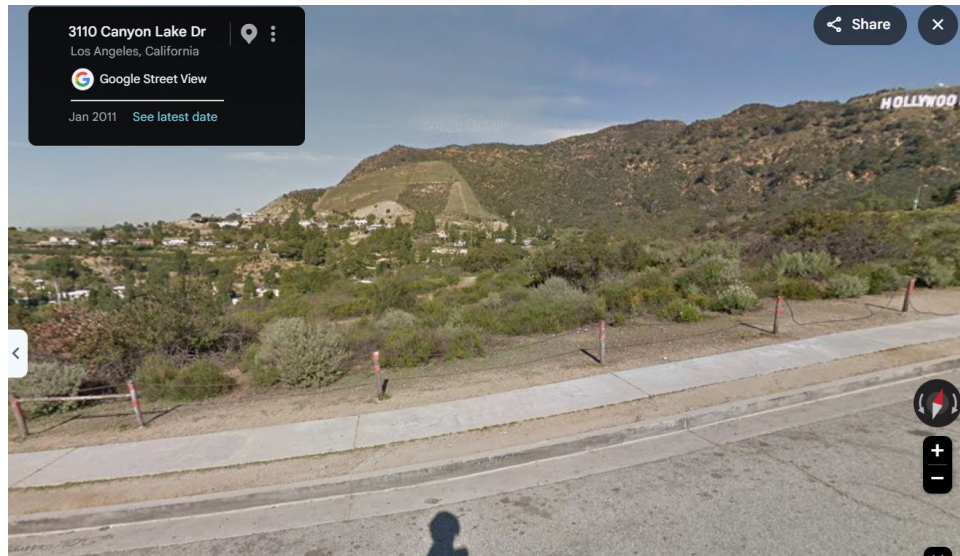
23. Despite the enormous fire risks that this traffic through the neighborhoods would create, and despite the increasing obstructions to everyday ingress and egress on the narrow and winding neighborhood streets, the City failed to take steps to prevent the nuisance conditions and safety risks that had been created in the area, which have only gotten worse with time.

///

1 24. Indeed, the City actively took steps that exacerbated the nuisance and the fire
2 hazards.

3 25. Prior to September 2011, for example, what is now a viewing site at approximately
4 3100 Canyon Lake Drive, at the intersection of Mulholland Highway and Canyon Lake Drive
5 (described throughout the Complaint as the “Viewing Site”), constituted entirely brush.

6 26. The following photograph of the Viewing Site was captured by Google Earth in
7 January 2011:



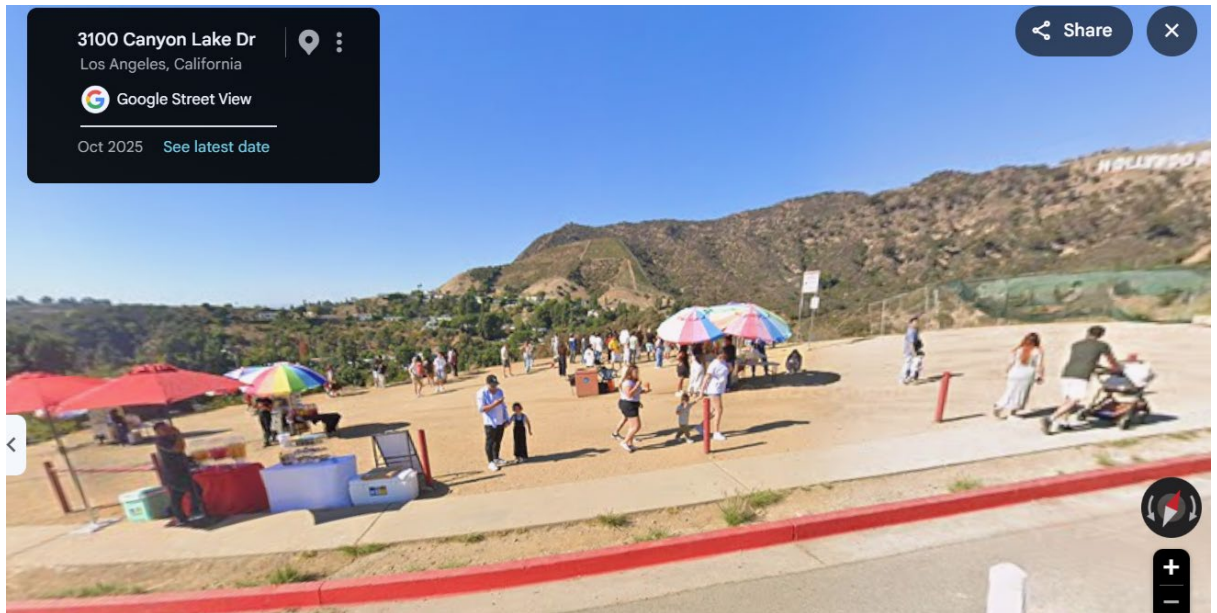
17 27. The site was cleared (on both sides of the street) in September 2011 by staff from
18 Council District (CD) 4. The following was captured by Google Earth that month:



1 28. The site was cleared for the purpose of promoting tourism and creating a view site.

2 29. Upon information and belief, then-CD 4 councilmember Tom LaBonge gave the
3 coordinates of the Viewing Site to Google Maps, which now lists it as the “Hollywood Sign
4 Lookout.”

5 30. Today, the Viewing Site is a major tourist destination, replete with tourists, illegal
6 street vendors, and crippling traffic:



1 31. The Viewing Site sits on land which is zoned Open Space (OS-1XL), but separates
2 two residential neighborhoods zoned for single family homes (RE15-1-HCR and R1-1-HCR) by
3 approximately 400 feet.

4 32. In part as a result of the improvements to the Viewing Site, traffic also increased at
5 the park and all the surrounding streets:







33. Just down the hill and around the corner from the Viewing Site, traveling north on Canyon Lake Drive, is Lake Hollywood Park, which was intended and had previously served as a neighborhood pocket park but has since become a tourist destination with illegal street vending:





34. In 2001, the City cut a fire road connecting the private access road at the top of Beachwood Drive (at Sunset Ranch Hollywood) to the Hollyridge Trail. Then, in January 2015, the City opened a new gate there, invited public access to the neighborhood, and funneled hikers and tourists up Beachwood Canyon as a way to view and hike to the Hollywood Sign on the Hollyridge Trail.

35. In March 2015, Sunset Ranch Hollywood sued the City, alleging that the resulting pedestrian traffic, which it alleged exceeded 1,000 people daily on holidays, interfered with its access easement. After trial in February 2017, the court ruled for Sunset Ranch, finding that the City had unreasonably interfered with its easement and business operations by channeling pedestrian traffic along the access road to the Hollyridge Trail. To comply with the resulting injunction, the City closed the Beachwood Drive gate and trailhead to pedestrians in April 2017.

36. As a result of the closure, upon information and belief, thousands of pedestrians and tourists that the City had encouraged to view the Hollywood Sign from the Hollywoodland neighborhood were redirected to the Viewing Site on Mulholland and Canyon Lake Drive, to Lake Hollywood Park, and to a pedestrian access point at the end of Deronda Drive as alternatives to view

1 the Hollywood Sign.

2 37. Thousands of tourists still attempt to access trails to view the Hollywood Sign from
3 Mulholland Highway.

4 38. Thousands of tourists attempt to access trails to view the Hollywood Sign from the
5 end of Deronda Drive, where there are two vehicle gates that tourists can bypass via a pedestrian
6 gate made accessible by the City.

7 39. Today, the City has allowed the proliferation of illegal street vendors, further creating
8 a public nuisance (including public urination and defecation at Lake Hollywood Park and illegal
9 dumping throughout the area), and further encouraging and abetting additional tourism and the
10 accompanying nuisance injuries throughout the Hollywood Hills Neighborhoods.

11 40. The City admits in its own documents that the current situation is “unsustainable.” It
12 explains, “As tourism grows and more visitors seek out iconic sights and landmarks to document
13 their trips via Instagram and other social media platforms, the Hollywood Sign will continue to be
14 inundated by hordes of selfie-seeking visitors, using Google Maps or MapQuest to find easy access
15 to the Sign, blocking residential streets and driveways, crossing over private lawns and impacting
16 and [sic] tranquility of local neighborhoods.” (See City of Los Angeles, Dept. of Convention &
17 Tourism Development, Tourism Master Plan (Mar. 2020) p. 41.)

18 41. The City, however, ignores its own role in promoting Lake Hollywood Park, the
19 Viewing Site, and the Hollywood Hills Neighborhoods generally as “landmarks” for viewing the
20 Hollywood Sign.

21 42. Plaintiffs have communicated with the City numerous times about the nuisance
22 conditions in their neighborhoods over the past decade and more.

23 43. In 2023, approximately 52 residents sent correspondence to the City and to CD 4
24 regarding the local conditions, demanding action.

25 44. On July 7 and July 12, 2025, the Lake Hollywood Homeowners Association wrote
26 to City officials, including to Jimmy Kim, the General Manager of the City’s Department of
27 Recreation and Parks, as well as Defendants Bass and Raman, via certified mail, that they may have
28 to consider legal action if the conditions did not improve.

1 45. Those letters stated, accurately: “For over a decade, the City of Los Angeles has been
2 on actual and constructive notice of these severe public safety hazards. This awareness is extensively
3 documented in numerous City Council Files (including but not limited to CF 14-1723, CF 17-0438
4 and its supplements, CF 18-1085, CF 23-0706, and CF 17-1115), departmental reports (e.g., the
5 2018 Dixon Study, LADOT Vision Zero studies), and a continuous record of resident complaints
6 and community impact statements detailing the ‘tremendous traffic congestion,’ ‘untenable
7 situation’ for pedestrian safety, pervasive illegal parking obstructing emergency access, and ‘illegal
8 and unpermitted commercial activities.’ Despite this overwhelming and undeniable notice, the City
9 has failed to implement effective, comprehensive, or sustained solutions.”

10 46. The City has long had knowledge of the nuisance-creating activities at Lake
11 Hollywood Park, the Viewing Site, and the Hollywood Hills Neighborhoods.

12 47. The City has long acquiesced in the conduct and activities that constitute the
13 nuisance.

14 48. The City has actively taken steps to encourage further viewing of the Hollywood
15 Sign in the Hollywood Hills Neighborhoods, exacerbating the nuisance conditions.

16 49. At a minimum, the City failed to take reasonable steps to prevent the nuisance
17 conditions despite its responsibility to do so as owner of the streets, sidewalks, and parks.

18 **Fire Hazards**

19 50. The conditions on City property in the Hollywood Hills Neighborhoods create a
20 serious risk of fire and death.

21 51. The Hollywood Hills Neighborhoods are in, and are completely surrounded by, what
22 CAL FIRE and the City of Los Angeles refer to as a “Very High Fire Hazard Severity Zone”
23 (VHFHSZ).

24 52. Crippling traffic routinely prevents fire trucks from getting to their destinations.

25 53. Vehicles routinely park in or otherwise block fire lanes.

26 54. Illegal street cart vendors routinely park in or otherwise block fire lanes.

27 55. Visitors routinely smoke cigarettes even though smoking is prohibited; they throw
28 the cigarette butts into the brush.

1 56. The following photograph constitutes but one of many examples of tourists who
2 smoke illegally when visiting the area to view the Sign:



13 57. It is well known that approximately 95 percent of wildfire ignitions are caused by
14 human interventions.

15 58. Improper cigarette disposal is one such human intervention that is a leading cause of
16 devastating wildfires.

17 59. On one day in 2025, a resident collected over 1,000 cigarette butts from near Lake
18 Hollywood Park:



1 60. At least one dozen fires were ignited in the Hollywoodland neighborhood in the
2 2018-2019 period alone, at least two caused by vehicles.

3 61. Two fires broke out in Lake Hollywood Park this calendar year alone. The causes
4 remain unknown.

5 62. During the recent Palisades and Eaton fires, the Hollywood Hills Neighborhoods
6 were under an evacuation warning. That did not stop tourists from coming to visit the Sign,
7 potentially slowing down necessary evacuations.

8 63. In 1961, a large fire swept through the neighborhood, destroying eight homes and
9 damaging up to 54 others. The reports from that fire indicated the difficulty of deploying firefighting
10 apparatuses because of the exceptionally narrow and winding streets. The streets have not
11 significantly changed in the last 65 years.

12 64. The inability of firefighters to access the Hollywood Hills Neighborhoods has
13 increased dramatically with the promotion of the neighborhood as a tourist amenity for viewing the
14 Hollywood Sign.

15 65. There are only two narrow, winding roads in and out of the Hollywood Hills
16 Neighborhoods, one on the Hollywoodland side (from Beachwood to LedgeWood) and one on the
17 Hollywood Knolls side (Lake Hollywood Drive). If a fire breaks out, dozens if not hundreds may
18 die due to their inability to escape via the crowded and narrow streets.

19 66. “No one is naive enough not to understand that the constant pressure of serious fear
20 can and often does destroy all happiness in life and property. All sane adults are aware of the latent
21 danger of fire, and their fears are quickly aroused by the unnecessary creation of extremely
22 hazardous situations. The presence in a settled residential community of an unnecessarily extreme
23 fire hazard can well create and maintain that fear in the lives of the people of that community and
24 make of the hazard a public nuisance.” (*County of San Diego v. Carlstrom* (1961) 196 Cal.App.2d
25 485, 491.)

26 67. The residents of the Hollywood Hills Neighborhoods live with constant pressure of
27 serious fear, destructive to their happiness, resulting from an unnecessarily extreme fire hazard
28 created or exacerbated by the acts and omissions of the Defendants.

Public Health Hazards

68. One corner of Lake Hollywood Park has become a public toilet, where visitors and particularly street vendors publicly urinate and defecate and even dispose of toilet paper:



69. The intersection of Canyon Lake Drive and the Innsdale fire road, just to the north of Lake Hollywood Park, has become another public toilet:



1 70. Tourists urinate and even defecate, or leave soiled diapers, on the streets and
2 sidewalks themselves, and on private property:



19 71. “[A]llowing individuals to urinate in public endangers the public health,” is
20 “indecent,” and “offensive to the senses.” It is therefore a public nuisance. (*People v. McDonald*
21 (2006) 137 Cal.App.4th 521, 535–536.)

22 72. Defecating in public necessarily also endangers the public health, is indecent, and
23 offends the senses.

24 **Illegal Street Vending**

25 73. The Viewing Site, Lake Hollywood Park, and the intersection of Canyon Lake Drive
26 and Innsdale fire road have become magnets for illegal street vendors.

27 74. The illegal street vendors use Lake Hollywood Park and other nearby areas as a
28 public toilet.

1 75. The illegal street vendors have no way to wash their hands after urinating or
2 defecating in Lake Hollywood Park or other nearby areas.

3 76. The illegal street vendors create a health and sanitation hazard.

4 77. The illegal street vendors often use propane and stoves of various kinds, creating an
5 illegal fire hazard.

6 78. The illegal street vendors block ADA sidewalk access:



17 79. The illegal street vendors block sidewalk access generally.

18 80. The illegal street vendors dump their food and other unsold products in the drains
19 and throughout the neighborhoods at the end of the day.

20 81. The illegal street vendors further promote the use of the Viewing Site and Lake
21 Hollywood Park as a tourist attraction.

22 Ingress and Egress

23 82. The conditions on the City-owned streets in the Hollywood Hills Neighborhoods
24 routinely obstruct the residents' ingress and egress from their properties to the public streets.

25 83. Such conditions are made significantly worse by the regular presence of oversized
26 vehicles, contrary to the vehicle restrictions in the area, including RVs, tour vans, full size tour
27 buses, tourist trolleys, and even school buses.

28 ///

84. “Interference with the ingress and egress to and from a public street constitutes both a private and a public nuisance.” (*Kempton v. City of Los Angeles* (2008) 165 Cal.App.4th 1344, 1349, quotation marks omitted.)

Noise

85. As a result of the conditions on the City-owned streets in the Hollywood Hills Neighborhoods, the residents are routinely subject to loud honking noises, car alarms, loud pedestrian talking, and loud party music from vehicles.

86. As a result of the conditions on the City-owned streets in the Hollywood Hills Neighborhoods, the residents are routinely subject to the revving of engines, especially from motor bikes and exotic car rentals.

87. These noises on the City's property are offensive to the senses.

Private Trespass

88. Numerous homeowners are subject to private trespassing from tourists attempting to view the Sign.

89. Numerous homeowners are disturbed in their use and enjoyment of their properties by tourists seeking to use restrooms, as there is no public restroom in the area.

Plaintiff Experiences

90. David Agnew and his wife and son reside in Hollywoodland, on Mulholland Highway where it intersects with the Innsdale fire road, just a short distance from the Viewing Site.

91. The Agnews' driveway is often blocked by cars.

92. As a result, Agnew has been late for appointments and his son has been late for school.

93. On several occasions, tourists have parked *in* their driveway, completely blocking their ability to exit.

94. The Agnews leave the neighborhood regularly, particularly on weekends and holidays, because of the traffic and their fears of being trapped in their house.

95. The Agnews witness cigarette and cannabis smoking (and observe improper cigarette, joint and vape disposal) outside of their house and on the Innsdale fire road practically

1 every day. They have anxiety over how they would get out of their neighborhood in the event of a
2 fire. They have concluded that they may have to hike out and have tried making preparations for
3 that eventuality.

4 96. The daily influx of hundreds of tourists has increased street litter dramatically.

5 97. As a public service, Agnew and his children have picked up trash on the street,
6 weekly, for years. They routinely find cigarette butts, liquor and beer bottles, water bottles (empty
7 or filled with human urine), cannabis and fast food packaging, gum, discarded clothing, and broken
8 glass, among other items left on their street and in front of their home, and regularly on their own
9 property as well.

10 98. Tourists routinely ring their doorbell or approach the Agnews when leaving their
11 house to ask if they can use their bathroom. The Agnews feel bad declining but feel they have no
12 choice given the risk of allowing strangers in the home with so little police presence in their
13 neighborhood.

14 99. Commercial tour groups regularly designate the space just outside the Agnews'
15 driveway as a meeting spot for their tour groups. The vans or tour buses (or other oversized vehicles)
16 often park illegally.

17 100. The tour groups routinely leave trash in their wake, right in front of the Agnews'
18 home.

19 101. Agnew works from home and experiences so much noise from the environs directly
20 in front of his house and backyard that it is often difficult to concentrate without the use of earplugs
21 or to enjoy his own backyard or host gatherings with clients and friends.

22 102. Other strange things occur on their street stemming solely from people's interest in
23 the Sign. The Agnews have encountered multiple, unpermitted film shoots, including a fully nude
24 photo shoot just outside their backyard gate, at night, with a three-person crew and professional
25 lights and camera.

26 103. The Agnews have had a trespasser in their backyard, apparently high on a powerful
27 drug, desperate to find a way to the Sign.

28 104. Motorcycles and even small cars illegally access the Innsdale fire road adjacent to

1 their house (by lifting up the chain blocking the entrance) to zip speedily under the Sign, causing
2 significant noise and fire risk.

3 105. Cars and tourist vans, almost every day, illegally park on and block the entrance to
4 the fire trail, significantly increasing fire risk.

5 106. Drones are a daily occurrence, and several have crashed into the Agnews' backyard
6 and onto their roof.

7 107. Cynthia Cobb resides in Lake Hollywood Estates, on Arrowhead Drive one house
8 away from the corner with Canyon Lake Drive, mere feet from Lake Hollywood Park.

9 108. Cobb experiences so much noise from Lake Hollywood Park and its environs,
10 including directly in front of her house, that she cannot enjoy her own backyard and cannot host
11 gatherings with friends.

12 109. Cobb has personally experienced tourists blocking her driveway and trespassing on
13 her property. Some tourists stop for "just a minute" to take a picture from her property. At other
14 times, vehicles block her driveway for over an hour.

15 110. At times, she has given up on using her driveway entirely in anticipation of having
16 to leave later in the day.

17 111. On holidays and particularly busy days, the traffic has become so severe that she and
18 her neighbors have difficulty getting into and out of their homes.

19 112. Cobb often postpones grocery shopping and errands until nighttime because it is too
20 difficult to get out of the neighborhood.

21 113. Because her house provides an ideal viewpoint for a picture with the Hollywood Sign
22 in the background, a kissing booth, street vendors, a man with an upright piano, and cheerleading
23 teams have parked and camped directly in front of her house.

24 114. Cobb and her husband feel trapped in their home; they live in constant fear that they
25 will die when fire inevitably comes.

26 115. During the Sunset Fire on the evening of January 8, 2025, Cobb's family evacuated
27 her home out of an abundance of caution. The evacuation was a non-mandatory warning only, yet
28 the drive down the hill took 45 minutes (without traffic it would take 6-8 minutes). Cobb noticed

1 cars coming up that slowed evacuation because there is room for only one car on LedgeWood Drive.

2 116. Cobb witnesses or picks up trash on a daily basis, including discarded diapers, plastic
3 bottles filled with urine, fruit cups and forks, used condoms, coffee cups and other food containers,
4 and other debris along the roads both in front of her home and surrounding the park.

5 117. She has witnessed fruit vendors dumping their used water, pieces of fruit, and other
6 waste into the storm drains.

7 118. Cobb has collected thousands of cigarette butts in Lake Hollywood Park and the
8 adjoining streets.

9 119. When Cobb and her husband first moved into their home, there was a wildlife
10 passage on her property that led to the nearby reservoir. They eventually had to install a new fence
11 and enclose the property because tourists were trespassing and would defecate, urinate, and smoke
12 cigarettes on their property, and also invade their privacy. What was supposed to be an open wildlife
13 passage became an area where the Cobbs felt compelled to protect their family and home from fire
14 hazards, biohazards, and repeated public intrusion.

15 120. Their use and enjoyment of their own home and property diminished significantly as
16 a result of the public and private nuisances.

17 121. Andy Corrigan and Tiger Rosen reside in Lake Hollywood Estates on Tahoe Drive
18 at the corner with Canyon Lake Drive, mere feet from Lake Hollywood Park.

19 122. Corrigan and Rosen are regularly trapped in their home, unable to leave because of
20 the cars blocking ingress and egress in front of their home.

21 123. Corrigan and Rosen live in constant fear and anxiety over whether they will be able
22 to escape in a fire.

23 124. Corrigan and Rosen regularly witness illegal cigarette smoking and cigarette butt
24 disposal.

25 125. Corrigan and Rosen leave the neighborhood regularly, particularly on holidays,
26 because of the traffic and their fears of being trapped in their house.

27 126. Corrigan and Rosen routinely observe cars park right in front of their carport, or in
28 the fire lane in front of their house, so that tourists can take pictures.

1 127. Corrigan and Rosen routinely observe smokers right in front of their house, which
2 creates an obnoxious odor on their property.

3 128. Corrigan and Rosen routinely observe improper cigarette disposal around their house
4 and the neighborhood.

5 129. Corrigan and Rosen routinely pick up used condoms and cigarette butts around their
6 house and throughout the neighborhood.

7 130. Corrigan and Rosen experienced regular invasions of their privacy as tourists would
8 loiter in front of their property and look in.

9 131. Corrigan and Rosen had to get rid of their English garden at the front of their home
10 because of the invasion of privacy; they replaced it at great expense with tall ficus hedges to prevent
11 the continued invasion.

12 132. Corrigan and Rosen routinely witness public urination on the wall across the street
13 from their property.

14 133. Corrigan and Rosen stopped going to the neighborhood pocket park (Lake
15 Hollywood Park) years ago because of the circus it has become.

16 134. Michael Di Girolamo and Craig Young live in Hollywoodland, on Durand Drive at
17 its intersection with Mulholland Highway, just up the street from the Viewing Site.

18 135. The nuisances occur immediately outside their home, nearly every single day.

19 136. Cars regularly stop in the middle of the road directly outside their home so occupants
20 can take photographs of the Hollywood Sign, causing traffic to back up and other drivers to sound
21 their horns.

22 137. Vehicles regularly block their gated driveway, preventing them from safely entering
23 or leaving their property.

24 138. Tourists regularly illegally park directly opposite their driveway. Because Durand
25 Drive is so narrow, this can leave insufficient room for them to maneuver a vehicle through their
26 gate, effectively trapping them inside their own property.

27 139. The ramp to their driveway has been broken and damaged by vehicles.

28 140. Di Girolamo and Young have observed that visitors frequently walk in groups along

1 the roadway and sometimes in the middle of the street because in many places there is simply
2 nowhere else for them to go.

3 141. Di Girolamo and Young regularly see trash discarded along the roadside, including
4 used bottles filled with urine, dirty diapers, and other waste, including right outside their property
5 when they exit.

6 142. Near their home, they have seen parents taking their little children to the bathroom
7 right out in public. They have seen visitors publicly urinate in the nearby trail.

8 143. Di Girolamo and Young have witnessed tourists illegally smoking cigarettes in the
9 neighborhood.

10 144. On several occasions either of them has politely asked people to extinguish their
11 cigarettes and they have been met with hostility and threats.

12 145. Di Girolamo and Young routinely see and pick up cigarette butts on their street and
13 on surrounding streets.

14 146. Di Girolamo and Young do not feel safe in their home. They live in persistent anxiety
15 about what would happen if they and their dogs had to escape during a wildfire or other emergency.

16 147. The same narrow streets and bottlenecks that cause problems on an ordinary busy
17 day could become critical during a fast-moving wildfire.

18 148. Di Girolamo and Young were in their home during the devastating fires that struck
19 Pacific Palisades and Altadena. When the Sunset Fire erupted at the same time and threatened the
20 Hollywood Hills, they were placed on high alert. They gathered what they could and prepared
21 themselves and their dogs to evacuate. What should have been a five-minute drive took them one
22 hour to escape the neighborhood. There were still tourists coming up to see the Sign, often blocking
23 the narrow and winding roads and slowing their exit.

24 149. Di Girolamo has also been diagnosed with a serious medical condition, creating
25 worry about their ability to access emergency services when needed.

26 150. Di Girolamo and Young also constantly hear loud honking and engine revving from
27 their own home, greatly diminishing their enjoyment of their home.

28 151. These are not abstract concerns. They have caused many sleepless nights and have

1 created an ongoing level of anxiety about living in their home.

2 152. Jay Gibson lives in Hollywood Knolls, approximately 200 feet above the Barham
3 Boulevard and Lake Hollywood Drive intersection.

4 153. That intersection serves as the primary entry and exit point for the Hollywood Knolls
5 neighborhood, and is used by visitors to reach and return from Lake Hollywood Park.

6 154. In that immediate area, Lake Hollywood Drive experiences daily backups of 30 to
7 40 vehicles.

8 155. Mr. Gibson regularly has difficulty with egress from his property to the public road.

9 156. Mr. Gibson regularly hears unbearable music and honking as a result of the traffic
10 on this small and winding road.

11 157. Visitors to Mr. Gibson's house have had cars sideswiped, including one time when
12 the car was totaled.

13 158. Mr. Gibson lives in a state of constant anxiety respecting whether he will be able to
14 exit his own home in the event of a fire or other emergency.

15 159. Mr. Gibson is constantly anxious simply about *leaving* his home on any given day.

16 160. Max Martens resides in Hollywoodland, on Ledgewood Drive near the intersection
17 with Heather Drive, a short distance from Mulholland Highway and about half a mile from the
18 Viewing Site. He lives on one of the two main routes that vehicles use for ingress and egress to
19 upper Beachwood Canyon.

20 161. He and his partner daily witness congestion, honking, cursing, and littering in front
21 of their home.

22 162. He and his partner both work from home and can rarely do so with the peace and
23 quiet necessary for their professions.

24 163. The road immediately in front of their house is often blocked in both directions.

25 164. The road is at a 9 percent grade, with blind corners, and cars often find themselves
26 face to face with oncoming cars in a single lane.

27 165. Martens and his partner have witnessed downhill drivers meet uphill drivers hood-
28 to-hood, resulting in a mutual standstill. Often the drivers do not know who must yield to whom,

1 which in any event becomes difficult if not impossible due to additional cars lining up behind from
2 each direction. The impasse causes routine yelling and honking. Martens and other residents have
3 often had to direct traffic themselves.

4 166. In one particularly egregious illustration, in May 2023 a truck driving downhill met
5 another car coming uphill; the truck driver claimed his vehicle had no operable reverse gear. This
6 caused a multicar jam in both directions for over 20 minutes. No one, including Martens, could get
7 in or out.

8 167. Martens and his partner live in fear for the day when critical services such as fire,
9 police, and ambulances cannot get to their destinations due to traffic slowdowns or gridlock on their
10 street.

11 168. Martens has personally witnessed and photographed multiple examples of LAFD and
12 LAPD vehicles stuck or significantly delayed by traffic.

13 169. One day in January 2025, when the area was supposed to be closed due to the risk
14 from the Palisades fire, one tourist parked in front of Mr. Martens's house, lit up a cigarette, and
15 started to hike to view the Sign.

16 170. Large buses and other vehicles have repeatedly broken down or gotten stuck, causing
17 hours-long backups, trapping residents including Mr. Martens in their homes.

18 171. On two different occasions, school buses full of children unloaded at the Beachwood
19 Market down the hill and hundreds of kids walked on foot up Ledgewood Drive toward the
20 Hollywood Sign viewing area. With no sidewalks to accommodate them, these underage youth
21 flooded the middle of the street in front of Martens's house, impairing vehicle traffic and exposing
22 themselves to danger.

23 172. Visitors routinely trespass on Martens and his partner's property. Their fountain has
24 been broken by those sitting on it.

25 173. On one occasion, tourists climbed onto the front porch of Martens's house to stage
26 an "influencer" photo shoot.

27 174. Their trash and recycling bins have been run over several times.

28 175. On December 17, 2015, a car struck and broke their garage.

1 176. On multiple occasions (especially after the garage was broken), their cars, which had
2 to be parked on the street, were sideswiped or hit by other vehicles, causing damage. There were at
3 least five such instances between September 29, 2019, and July 17, 2023 (when the car was declared
4 a total loss). They suffered approximately \$17,000 in losses as a result of the five incidents. These
5 losses are alleged only to show special injury, not to seek damages.

6 177. Rodney Russell lives in Lake Hollywood Estates, on Canyon Lake Drive where it
7 intersects with both Arrowhead Drive and Tahoe Drive, right across from Lake Hollywood Park.

8 178. Russell routinely witnesses and experiences large numbers of people actively smoke
9 and cast aside their cigarettes, adding significantly to the risk of fire.

10 179. Russell routinely witnesses and experiences a variety of commercial tourism services
11 bring visitors up into the communities in unsafe ways, including oversized vehicles which park in
12 emergency spots or block residents' driveways.

13 180. Russell has witnessed cars broken into, tourists assaulted by others, and even
14 gunshots.

15 181. Russell has observed that vendors and tourists defecate and urinate in areas around
16 the neighborhood, and even the residents' yards. He has found human feces in a bag in his yard
17 before. Across the street from his house there is a series of bushes and he regularly sees individuals
18 urinate in or on the bushes, and even squat down to defecate.

19 182. Russell has observed large amounts of trash being discarded by vendors and tourists,
20 which the residents have to clean up on a daily basis. On almost a daily basis, he has to pick up trash
21 in his own yard including bottles of urine.

22 183. Private homes have become regularly over-run with visitors coming onto their
23 property. In Russell's case, he has had dozens of people on his property, trampling his landscaping,
24 and even plugging phones into his power outlets.

25 184. To address these private trespasses and private nuisances, Russell has had to spend a
26 significant amount of money to build a fence.

27 185. Russell also regularly experiences total blockages in front of his driveway, whether
28 tourists stopping to take pictures or parked cars blocking the exit, preventing all ingress and egress

1 between his home and the public streets. At times, tourists have even parked *in* his driveway.

2 186. Russell regularly experiences honking and loud music and other noises from his
3 home, greatly diminishing his enjoyment of his home.

4 187. There are days when Russell simply abandons his plans to leave the house because
5 the streets are entirely backed up.

6 188. Russell lives in constant anxiety of being trapped and unable to escape in the event
7 of a fire like the recent Palisades fire.

8 189. Russell no longer uses the neighborhood pocket park because of the vendors and
9 chaos that has emerged there.

10 **COUNT I – ENJOINER OF PUBLIC NUISANCE**

11 ***(By All Plaintiffs Against All Defendants)***

12 190. Plaintiffs restate the above allegations as though set forth fully here.

13 191. The Civil Code defines nuisance as follows:

14 Anything which is injurious to health, including, but not limited to, the illegal sale of
15 controlled substances, or is indecent or offensive to the senses, or an obstruction to
16 the free use of property, so as to interfere with the comfortable enjoyment of life or
17 property, or unlawfully obstructs the free passage or use, in the customary manner,
of . . . any public park, square, street, or highway.

18 (Civ. Code, § 3479.)

19 192. A public nuisance is “one which affects at the same time an entire community or
20 neighborhood, or any considerable number of persons, although the extent of the annoyance or
21 damage inflicted upon individuals may be unequal.” (Civ. Code, § 3480.)

22 193. In California, “[b]locking a public sidewalk constitutes a public nuisance per se.”
23 (*Kempton, supra*, 165 Cal.App.4th at p. 1348.)

24 194. Obstructing any other part of a road or street or part of a public park or square is also
25 a public nuisance under the plain language of Civil Code section 3479.

26 195. California courts have recognized the following as public nuisances:
27 (1) “[i]nterference with the ingress and egress to and from a public street” (*Kempton, supra*, 165
28 Cal.App.4th at p. 1349); (2) public urination (*McDonald, supra*, 137 Cal.App.4th at pp. 535–536);

1 and (3) fire hazards (*Carlstrom, supra*, 196 Cal.App.2d at p. 491).

2 196. As a municipality, the City has an affirmative “duty to keep sidewalks in safe
3 condition [and] is directly liable to pedestrians for failing to correct a dangerous condition of which
4 it had notice. . . .” (*Peters v. City & County of San Francisco* (1953) 41 Cal.2d 419, 429; see also
5 *City of Chicago v. Robbins* (1862) 67 U.S. 418, 422 [“It is well settled that a municipal corporation
6 having the exclusive care and control of the streets, is obliged to see that they are kept safe for the
7 passage of persons and property, and to abate all nuisances that might prove dangerous; and if this
8 plain duty is neglected, and any one is injured, it is liable for the damages sustained”].)

9 197. The City “is not relieved of its responsibility in this regard merely because the
10 condition was created or maintained” by a third party who may also be liable. (*Peters, supra*, 41
11 Cal.2d at p. 429; accord *Kempton, supra*, 165 Cal.App.4th at p. 1349.)

12 198. Further, as possessor of public land, the City has a duty to abate and not contribute
13 to nuisances found thereon. Civil Code section 3483 provides that “[e]very successive owner of
14 property who neglects to abate a continuing nuisance upon, or in the use of, such property, created
15 by a former owner, is liable therefor in the same manner as the one who first created it.” (Civ. Code,
16 § 3483; see also Pen. Code, § 372 [“Every person who maintains or commits any public nuisance,
17 the punishment for which is not otherwise prescribed, or who willfully omits to perform any legal
18 duty relating to the removal of a public nuisance, is guilty of a misdemeanor”].)

19 199. California follows the Restatement (Second) of Torts’ approach to nuisance law.
20 (*Benetatos v. City of Los Angeles* (2015) 235 Cal.App.4th 1270, 1282–1283 [applying Rest.2d Torts,
21 § 838]; see also *People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1105; *San Diego Gas &
22 Electric Co. v. Superior Court* (1996) 13 Cal.4th 893, 938; *City of Los Angeles v. San Pedro Boat
23 Works* (9th Cir. 2011) 635 F.3d 440, 452.)

24 200. The Restatement provides that violations of state law or City ordinances may be
25 evidence of nuisance. (Rest.2d Torts, § 821B, subd. (2)(b).)

26 201. As described above, numerous violations of state laws and city ordinances are
27 occurring at the Viewing Site, at Lake Hollywood Park, and on the City-owned property in the
28 Hollywood Hills Neighborhoods more generally, including but not limited to Los Angeles

1 Municipal Code section 42.13 (unpermitted vending); Los Angeles Municipal Code section 63.44,
2 subdivision B.3 (vending in park); Los Angeles Municipal Code section 64.70.02 (pollutant
3 discharge); Penal Code sections 374, 374.3, 374.4 (prohibition on littering); Health and Safety Code
4 section 5411 (prohibition on human waste); and California Fire Code section 503 (non-obstruction
5 of fire lanes).

6 202. The Restatement further provides that “[a] possessor of land upon which a third
7 person carries on an activity that causes a nuisance is subject to liability for the nuisance if it is
8 otherwise actionable,” and if the possessor “knows or has reason to know that the activity is being
9 carried on and that it is causing or will involve an unreasonable risk of causing the nuisance,” and
10 further if the possessor either “consents to the activity or fails to exercise reasonable care to prevent
11 the nuisance.” (Rest.2d Torts, § 838; see also *id.* at § 839.)

12 203. California courts have recognized that “under the common law, a landowner’s
13 liability for a public nuisance could result from the failure to act as well as from affirmative
14 conduct.” (*City of Modesto Redevelopment Agency v. Superior Court* (2004) 119 Cal.App.4th 28,
15 37, citing *Leslie Salt Co. v. San Francisco Bay Conservation & Development Com.* (1984) 153
16 Cal.App.3d 605, 619, 622.)

17 204. The existence of the nuisance is obvious and known to Defendants.

18 205. The Defendants have further consented to the nuisance activities on their lands
19 because they have knowledge of the nuisance and acquiesce in it.

20 206. Alternatively, the Defendants have failed to take reasonable steps to prevent the
21 nuisance.

22 207. Defendants are also liable for the nuisance because their own actions have been a
23 substantial factor in bringing about the nuisance.

24 208. A person may bring an action for public nuisance if the nuisance “is specially
25 injurious to himself” (Civ. Code, § 3493.)

26 209. The resident members of the HHCSC and the Plaintiffs in this action have endured
27 substantial and unreasonable disruptions in the enjoyment of their property as a result of the public
28 nuisance, including but not limited to private trespasses and the blocking of ingress and egress from

1 their properties to the public streets.

2 210. Because of their proximity to the nuisance, the resident members of the HHCSC and
3 the Plaintiffs in this action have been damaged in ways specially injurious to themselves. This
4 includes (a) repeated physical trespass onto their property, including tourists entering their yards,
5 porches, and driveways and drones crashing onto their roofs and into their yards; (b) urination,
6 defecation, and the deposit of human waste, including feces and bottles of urine, on their own
7 property; (c) physical damage to their property, and the expense of fences, hedges, and other
8 measures needed to protect it; and (d) repeated obstruction of ingress to and egress from their homes,
9 including vehicles blocking or parking in their driveways and carports and trapping Plaintiffs inside
10 their properties.

11 211. HHCSC and its members and the individual Plaintiffs seek injunctive relief to order
12 Defendants to abate the nuisance.

13 **COUNT II – ENJOINER OF PRIVATE NUISANCE**
14 ***(By All Plaintiffs Against All Defendants)***

15 212. Plaintiffs restate the above allegations as though set forth fully here.

16 213. All of the resident members of HHCSC and the Plaintiffs are homeowners in
17 Hollywoodland, Lake Hollywood Estates, or Hollywood Knolls.

18 214. Defendants' actions and inactions have created or permitted a condition to exist that
19 is harmful to the health of these resident members and of the Plaintiffs; that is indecent and offensive
20 to the senses; that leads to private trespasses; that diminishes the use and enjoyment of the residents'
21 homes and properties; and that decreases the value of their homes.

22 215. Defendants' conduct has been and is intentional and unreasonable, or unintentional
23 but negligent or reckless.

24 216. Defendants' conduct was a substantial factor in causing the invasion, and the
25 seriousness of the harm outweighs any public benefit of the invasion.

26 217. Plaintiffs seek injunctive relief ordering Defendants to abate the nuisance.

27 ///

28 ///

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs respectfully request the following:

- 3 A. That judgment be rendered in favor of Plaintiffs and against Defendants on all counts
4 alleged in this Complaint.
- 5 B. That judgment be entered declaring the Viewing Site, Lake Hollywood Park, and the
6 end of Deronda Drive at the vehicle and pedestrian gates to be public and private
7 nuisances.
- 8 C. That judgment be entered declaring that the streets, sidewalks, and other public
9 property in the Hollywood Hills Neighborhoods constitute public and private
10 nuisances.
- 11 D. That a permanent injunction be entered requiring Defendants to undertake remedial
12 measures to mitigate the effects of the Defendants' past and ongoing violations of
13 law in contributing to, consenting to, or failing to prevent public and private
14 nuisances on City property at the Viewing Site, at Lake Hollywood Park, at the end
15 of Deronda Drive, and in the Hollywood Hills Neighborhoods.
- 16 E. Reasonable attorneys' fees, expert expenses, and costs, as provided by law, including
17 but not limited to pursuant to the private attorney general statute (Code Civ. Proc.,
18 § 1021.5).
- 19 F. Such other relief as the Court finds just and proper.

20
21 Respectfully submitted,

22 TULLY | BAILEY LLP

23 Dated: October 26, 2026

By: /s/ Ilan Wurman

24 Ilan Wurman

Stephen W. Tully

25 LiMANDRI & JONNA LLP

26 Charles S. LiMandri

27 Paul M. Jonna

28 Jeffrey M. Trissell