

1 TIMOTHY KASSOUNI, ESQ., SBN 142907
2 R.S. RADFORD, ESQ., SBN 137533
3 KASSOUNI LAW
4 621 Capitol Mall, Suite 2025
5 Sacramento, CA 95814
6 Telephone: (916) 930-0030
7 Facsimile: (916) 930-0033

5 FRANK C. GILMORE, ESQ., SBN 283859
6 ROBISON, SHARP, SULLIVAN & LOW
7 71 Washington Street
8 Reno, NV 89503
9 Telephone: (775) 329-3151
10 Facsimile: (775) 329-7941

11 Attorney for Plaintiffs CITIZENS FOR FREE
12 SPEECH, LLC; MICHAEL SHAW

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

18 CITIZENS FOR FREE SPEECH, LLC;
19 MICHAEL SHAW;

20 Plaintiffs,

21 vs.

22 COUNTY OF ALAMEDA; ALAMEDA
23 COUNTY EAST COUNTY BOARD OF
24 ZONING ADJUSTMENTS; FRANK J.
25 IMHOFF, SCOTT BEYER, and
26 MATTHEW B. FORD, in their official
27 capacities as members of the Alameda
28 County East County Board of Zoning
Adjustments,

Defendants.

Case No.: 4:18-cv-00834-SBA

**FIRST AMENDED COMPLAINT FOR
CIVIL RIGHTS VIOLATION AND
INJUNCTIVE AND DECLARATORY
RELIEF;
Civil Rights Action (42 U.S.C.
Section 1983) for Damages,
Declaratory Relief, and Injunctive
Relief**

- 1. 42 U.S.C. § 1983 [Free Speech]
- 2. 42 U.S.C. § 1983 [Due Process]
- 3. 42 U.S.C. § 1983 [Equal Protection]
- 4. 42 U.S.C. § 1988 [Civil Rights]

DEMAND FOR JURY TRIAL

Plaintiffs, for their Complaint, allege the following:

PARTIES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. Plaintiff CITIZENS FOR FREE SPEECH, LLC (“Citizens”) is a Nevada limited liability corporation qualified to do business in California.
2. Plaintiff MICHAEL SHAW (“Shaw”) is an individual residing within this District.
3. Defendant COUNTY OF ALAMEDA (“County”) is a political subdivision of the State of California, and is a “person” subject to suit within the meaning of 42 U.S.C. § 1983. It is vested with the supervision of regulations and approval of signs within its geographic limits.
4. Defendant EAST COUNTY BOARD OF ZONING ADJUSTMENTS (“Board”) is an administrative board operating under authority of Alameda County Administrative Code Chapter 2.4.140 and Ordinance Code Title 17, and is a “person” subject to suit within the meaning of 42 U.S.C. § 1983. It is vested with conducting abatement hearings relating to signs within its geographic limits.
5. Defendants FRANK IMHOFF, SCOTT BEYER, and MATTHEW B. FORD are, and were at all times relevant to this complaint, members of the East County Board of Zoning Adjustments. These Defendants’ duties include adjudicating alleged violations of the County’s Code of Ordinances relating to signs within the Board’s geographic limits. They are sued in their official capacities.

JURISDICTION

6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3). Plaintiffs seek to redress a deprivation of rights guaranteed by the First and Fourteenth Amendments to the United States Constitution, pursuant to 42 U.S.C. § 1983.

INTRADISTRICT ASSIGNMENT

7. Pursuant to Civil L.R. 3-2(c), this case shall be assigned to the San Francisco or the Oakland Division because the action arises in Alameda County. This Court is an appropriate venue for this cause of action pursuant to 28 U.S.C. §§

1 1391(b)(1) and (b)(2). The actions complained of took place in this judicial district,
2 evidence is maintained in this district, the signs erected are in this district, and but for the
3 unlawful regulations and practices of Defendants, Plaintiff would not be subject to
4 monetary fines and deprivation of property.

5 **FACTS COMMON TO ALL CAUSES OF ACTION**

6 8. Plaintiff Shaw is the owner of a parcel of land located at 8555 Dublin
7 Canyon Road, within the unincorporated area of the County (the "Parcel").

8 9. Plaintiff Citizens has entered into an agreement with Shaw for the
9 construction and display of signs on the Parcel.

10 10. In or about 2014, Citizens displayed signs on newly constructed structures
11 on the Parcel per the agreement with Shaw. These signs initially displayed political
12 messages which Plaintiffs considered to be contrary to the political ideology espoused by
13 County officials. The signs currently display both political and commercial messages.

14 11. The County has promulgated certain ordinances, known as the Alameda
15 County Code of Ordinances (the "Code"), which purport to regulate the display of signs in
16 unincorporated areas of the County. The display of Plaintiffs' signs was not allowed under
17 the Code. Other signs are exempt from the speech restrictions imposed by the Code,
18 depending on the entity displaying the sign and the content of the speech displayed
19 thereon. The Code vested unbounded discretion in local officials to determine whether,
20 and when, signs could be displayed.

21 12. On June 1, 2014, Plaintiffs filed suit in this Court, Case No. 4:14-cv-02513,
22 (the "Litigated Case"), naming the County as defendant. In the Litigated Case, Plaintiffs
23 alleged that the Code's regulation of signs violated Plaintiffs' rights to free speech and
24 equal protection under the First and Fourteenth Amendments to the United States
25 Constitution, and prayed that the County be enjoined from any and all conduct enforcing
26 the unconstitutional Code to prohibit, encumber, or penalize Plaintiffs' signs.

27 13. In the Complaint that commenced the Litigated Case, Plaintiffs asserted
28 claims for, (1) violations of free speech under the First Amendment, (2) violations of

1 Plaintiffs' right to equal protection, (3) for civil rights violations under 42 U.S.C. §1983, (4)
2 for violation of free speech under the California Constitution, (5) for violation of rights to
3 equal protection under the California Constitution. Plaintiffs sought damages, injunctive
4 relief, attorneys' fees and costs, and declaratory relief.

5 14. The day after the Litigated Case was commenced, on June 2, 2014, the
6 County issued a "Declaration of Public Nuisance – Notice to Abate" ("2014 Notice"). A
7 copy of the 2014 Notice is attached hereto as **EXHIBIT 1**.

8 15. The 2014 Notice alleged that Plaintiffs' signs were "in violation of Alameda
9 County Zoning Ordinance 17.18.010 and 17.18.120 and the provision of Alameda County
10 General Plan."

11 16. On July 8, 2016, the Court granted in part and denied in part Plaintiffs'
12 Motion for Summary Judgment, finding, among other things, that a provision in
13 Alameda's Code regulating signs was content-based and could not survive strict scrutiny
14 review (Doc #105).

15 17. On March 8, 2017, the Court then entered its Order granting Plaintiffs'
16 motion for attorneys' fees, damages, and costs of suit (Doc #130). Plaintiffs were
17 awarded one dollar in damages "to acknowledge the 'importance to organized society'
18 that its constitutional rights "be scrupulously observed."

19 18. A final Judgment in Plaintiffs' favor ("Judgment") was then entered in the
20 Litigated Case on March 8, 2017.

21 19. At no point prior to the entry of the Judgment did the County file (or seek
22 leave to file) a counterclaim in the Litigated Case against Plaintiffs to abate the signs.

23 20. The Judgment of this Court is a valid, final judgment. Any further litigation
24 by the County against Plaintiffs, attempting to remove the signs or impose monetary
25 penalties under authority of the Code, is barred by claim preclusion and issue preclusion.
26 Res judicata, or claim preclusion, "treats a judgment, once rendered, as the full measure
27 of relief to be accorded between the parties on the same 'claim' or 'cause of action.'" *Robi*
28 *v. Five Platters Inc.*, 838 F.2d 318, 321 (9th Cir.1988) (quoting *Kaspar Wire Works, Inc. v.*

1 *Leco Eng'g & Mach., Inc.*, 575 F.2d 530, 535 (5th Cir.1978)). “An action is barred under
2 *res judicata* where (1) the prior litigation involved the same parties or their privies, (2) the
3 prior litigation was terminated by a final judgment on the merits, and (3) the prior litigation
4 involved the same “claim” or “cause of action” as the later suit. *Hydranautics v. FilmTec*
5 *Corp.*, 204 F.3d 880, 888 (9th Cir. 2000)(citing *Blonder–Tongue Laboratories v.*
6 *University of Illinois Foundation*, 402 U.S. 313, 323–324, 91 S.Ct. 1434, 1439–1440, 28
7 L.Ed.2d 788 (1971).

8 21. On or about September 28, 2017, the County mailed to Shaw a
9 “Declaration of Public Nuisance – Notice to Abate” (“2017 Notice”). A copy of the 2017
10 Notice is attached hereto as **EXHIBIT 2**.

11 22. The 2017 Notice stated that the signs were maintained in violation of
12 17.18.120, which was the same section of the Code cited in the 2014 Notice. The
13 County demanded that Shaw remove the signs or face monetary penalties.

14 23. On or about November 22, 2017, the County mailed to Plaintiff Shaw a
15 “Notice of Administrative Hearing on Abatement of Nuisance” (“Notice of Administrative
16 Hearing”). This notice stated that the Board would conduct an administrative adjudication
17 to determine whether the signs violate the Code, and could authorize the demolition and
18 removal of the signs and their support structures by the County, at Plaintiffs’ expense.

19 24. By adjudicating Plaintiffs’ liability for displaying the signs in an
20 administrative proceeding before the Board, the County can unilaterally suppress
21 Plaintiffs’ political and commercial speech without a court order, without an automatic
22 stay of the abatement procedures pending judicial review, and without the approval of a
23 judicial officer, in violation of Plaintiffs’ rights as set forth in 4805 Convoy, Inc. v. City of
24 San Diego, 183 F.3d 1108, 1116 (9th Cir. 1999)(“This gives rise to the possibility of the
25 suppression of protected expression before judicial review of the case on the merits, and
26 is therefore contrary to the principles which underlie the procedural safeguards set forth
27 in FW/PBS. Thus, while the maintenance of the status quo in the license suspension and
28 revocation context may save an ordinance which does not provide for a prompt judicial

1 hearing or decision, we cannot conclude that a discretionary stay provides the requisite
2 protection in such a case.”).

3 25. The County’s “Abatement Procedures” under Chapter 17.59 of the Code
4 does not provide for maintenance of the status quo pending judicial review. Accordingly,
5 the County is permitted under the Code to remove Plaintiffs’ signs and deprive Plaintiffs
6 of the ability to display their speech prior to judicial review of the alleged violation.

7 26. As set forth in the 2017 Notice, the County is attempting to suppress
8 Plaintiffs’ protected speech through the administrative process before a judicial officer will
9 review the abatement issues on their merits.

10 27. On May 25, 2018, counsel of record for the County confirmed that the
11 County would not postpone the abatement efforts pending the results of the Plaintiffs’
12 appeal of the denial of their request for injunctive relief.

13 28. The County similarly refused Plaintiffs’ request for the maintenance of a
14 status quo as to Plaintiffs’ protected speech pending resolution of the merits of the 2017
15 notice by this Court, a judicial officer.

16 29. Thus, unless enjoined by this Court, the County will infringe on Plaintiffs’
17 constitutionally protected rights by removing and suppressing Plaintiffs’ signs and the
18 speech displayed thereon without a judicial determination, thereby causing irreparable
19 injury, as damages alone cannot fully compensate Plaintiffs for the ensuing harm. This
20 threat of injury from continuous violations of Plaintiffs’ free speech and equal protection
21 rights requires temporary, preliminary, and permanent injunctive relief.

22 30. The County is attempting to suppress Plaintiffs’ freedom of speech via an
23 administrative adjudication because enforcing the 2017 Notice in a court of law would be
24 barred by claim preclusion, issue preclusion, and Federal Rule of Civil Procedure 13(a).

25 31. Because the County did not file a counterclaim in the Litigated Case
26 alleging that the signs violated any provisions of the Code, the County is barred from
27 raising such a claim in a court of law by claim preclusion, issue preclusion, and Rule
28 13(a) of the Federal Rules of Civil Procedure.

1 protected speech, without a court order and without the approval of a judicial officer.
2 Requiring Plaintiffs to either acquiesce in the removal of the signs, or engage in an
3 administrative proceeding which can result in the forcible removal of Plaintiff's signs
4 without the approval of a judicial officer, subjects Plaintiffs to the deprivation of free
5 speech rights secured by the First Amendment to the United States Constitution.

6 39. The County's Abatement Procedure is barred by claim preclusion, issue
7 preclusion, and FRCP 13(a).

8 40. The deprivation of Plaintiffs' free speech rights is subject to action pursuant
9 to 42 U.S.C. § 1983.

10 **SECOND CAUSE OF ACTION**
11 **FOR VIOLATION OF RIGHT TO DUE PROCESS OF LAW**
12 **UNDER THE UNITED STATES CONSTITUTION**

13 41. Plaintiffs incorporate by reference all prior paragraphs of this Complaint as
14 though set forth herein in their entirety.

15 42. The County's enforcement of the Code against Plaintiffs via an
16 administrative adjudication, in disregard of the preclusive effect of this Court's final order
17 in the Litigated Case, and in violation of Rule 13(a) of the Federal Rules of Civil
18 Procedure and California Code of Civil Procedure §§426.10 - 426.70, and subjects
19 Plaintiffs to the deprivation of due process rights secured by the Fourteenth Amendment
20 to the United States Constitution.

21 43. The deprivation of Plaintiffs' due process rights is subject to action pursuant
22 to 42 U.S.C. § 1983.

23 **THIRD CAUSE OF ACTION**
24 **FOR VIOLATION OF RIGHT OF FREE SPEECH**
25 **UNDER THE UNITED STATES CONSTITUTION**

26 44. Plaintiffs incorporate by reference all prior paragraphs of this Complaint as
27 though set forth herein in their entirety.

28 45. The Code as set forth herein subjects Plaintiffs to the deprivation of free
speech rights secured by the First Amendment to the United States Constitution.

46. Alternatively, if the Court were to determine that the County's abatement

1 efforts are not barred by issue preclusion, claim preclusion, California Code of Civil
2 Procedure §§426.10 - 426.70, or FRCP 13(a), then Plaintiffs allege that certain provisions
3 of the Alameda Code are content-based regulation of speech which fail to meet strict
4 scrutiny review.

5 47. The existing Code contains content-based and speaker-based regulations
6 of speech in violation of the First Amendment. Plaintiffs bring an as-applied challenge, a
7 facial challenge, and an overbreadth challenge to the Code in existence as of the date of
8 the 2017 Notice.

9 48. For example, Code §17.52.520 contains content-based exemptions to the
10 permitting requirement, and are exempt from the size requirements under the Code.

11 49. The Code favors commercial speech over non-commercial speech because
12 it permits real estate “for sale” and “for lease” signs to exceed the square footage of a
13 political sign.

14 50. Code Section 17.52.520 is a content-based law. Content-based laws are
15 “those that target speech based on its communicative content.” (*Reed v. Town of Gilbert*,
16 135 S. Ct. 2218, 2231 (2015)). The “commonsense” test for determining whether a law is
17 content-based “requires a court to consider whether a regulation of speech ‘on its face’
18 draws distinctions based on the message a speaker conveys” including both “obvious”
19 legal distinctions that are based upon the subject matter, topic, and idea of a message,
20 as well as “more subtle” legal distinctions that are based upon the “function or purpose”
21 of a message. (*Id.* at 2227.)

22 51. Content-Based laws are presumptively unconstitutional. It is the
23 government's burden to demonstrate that the challenged distinctions further a compelling
24 governmental interest and is narrowly tailored to that end. (*Id.* at 2231.)

25 52. Content-based laws are subject to strict scrutiny. To overcome the
26 presumption of unconstitutionality, content-based laws must withstand so-called “strict
27 scrutiny.” (*Id.* at 2226-2227.)

28 53. The deprivation of Plaintiffs’ free speech rights is a *per se* injury subject to

1 action pursuant to 42 U.S.C. § 1983.

2 **FOURTH CAUSE OF ACTION**
3 **FOR VIOLATION OF RIGHT OF EQUAL PROTECTION**
4 **UNDER THE UNITED STATES CONSTITUTION**

5 54. Plaintiffs incorporate by reference all prior paragraphs of this Complaint as
6 though set forth herein in their entirety.

7 55. The Code as set forth herein subjects Plaintiffs to the deprivation of equal
8 protection rights secured by the Fourteenth Amendment to the United States
9 Constitution.

10 56. Alternatively, if the Court were to determine that the County’s abatement
11 efforts are not barred by claim preclusion, issue preclusion, or FRCP 13(a), then Plaintiffs
12 allege that certain provisions of the Alameda Code violate their right to equal protection
13 as set forth above.

14 57. The deprivation of Plaintiffs’ equal protection rights is subject to action
15 pursuant to 42 U.S.C. § 1983.

16 **FIFTH CAUSE OF ACTION**
17 **FOR CIVIL RIGHTS VIOLATIONS**

18 58. Plaintiffs incorporate by reference all prior paragraphs of this Complaint as
19 though set forth herein in their entirety.

20 59. This action is brought to vindicate Plaintiffs’ civil rights under the United
21 States Constitution pursuant to 42 U.S.C. § 1983.

22 60. As such, Plaintiffs are entitled to attorneys’ fees and costs, and expert fees
23 pursuant to 42 U.S.C. § 1988.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiffs respectfully request judgment against Defendants:

26 1. For temporary, preliminary, and permanent injunctive relief pursuant to the
27 All Writs Act, barring the Board and its members from conducting any hearing relating to
28 the County’s September 28, 2017, “Declaration of Public Nuisance – Notice to Abate;”

2. For temporary, preliminary, and permanent injunctive relief barring the

1 County and all its employees, agents, and attorneys, current and future, from taking any
2 action to enforce any ruling or determination that the signs violate any provision of the
3 Code, until that ruling or determination has been reviewed by a judicial officer in a court
4 of law.

5 3. For temporary, preliminary, and permanent injunctive relief barring the
6 County and all its employees, agents, and attorneys, current and future, from taking any
7 action, directly or indirectly, to remove the signs and structures;

8 4. For declaratory relief declaring that requiring Plaintiffs to engage in an
9 administrative proceeding before the Board, when such a proceeding in a court of law
10 would be barred by claim preclusion, issue preclusion, and Rule 13(a), and violates the
11 First and Fourteenth Amendments;

12 5. For declaratory relief declaring that the County's sign regulation scheme
13 contained in the Code violates the First Amendment, equal protection, and due process;

14 6. For additional actual, consequential, and other special damages in an
15 amount according to proof at trial;

16 7. For reasonable attorneys' fees pursuant to statute(s);

17 8. For nominal damages;

18 9. For costs of suit; and,

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

10. For such other and further relief as the Court deems just, equitable, and proper.

DATED: This 7th day of June, 2018.

TIMOTHY KASSOUNI, ESQ., SBN 142907
R.S. RADFORD, ESQ., SBN 137533
KASSOUNI LAW
621 Capitol Mall, Suite 2025
Sacramento, CA 95814

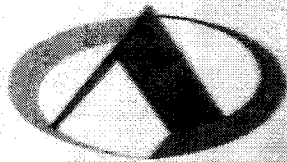
And

ROBISON, SHARP, SULLIVAN & BRUST
71 Washington Street
Reno, Nevada 89503

/s/ Frank C. Gilmore
FRANK C. GILMORE, SBN 283859
TIMOTHY KASSOUNI, ESQ., SBN 142907
R.S. RADFORD, ESQ., SBN 137533
Attorneys for Plaintiffs/Appellants CITIZENS
FOR FREE SPEECH, LLC; MICHAEL SHAW

EXHIBIT 1

EXHIBIT 1



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

June 2, 2014

Chris Bazar
Agency Director

Albert Lopez
Planning Director

224
West Winston Ave.
Room 111
Hayward
California
94544

phone
510.670.5400
fax
510.785.8793

www.acgov.org/cda

Michael C Shaw
32 Seascape Vlg
Aptos CA 95003

Subject: Declaration of Public Nuisance - Notice to Abate
Property: 8555 Dublin Canyon Rd., Castro Valley CA 94552
APN: 085A-0800-008-01

As a result of an inquiry, on **June 2, 2014**, I conducted a site visit and determined that a violation exists. The specific violation is **unlawful signs (billboards)**. This is in violation of Alameda County Zoning Ordinance Section 17.18.010 and 17.18.120 and the provisions of the Alameda County General Plan (not a permissible use under the Resource Management land use designation).

If future violations of this type occur, you will be charged \$500.00. In order to bring your property into compliance, the following measure(s) must be taken within **ten (10) days from the postmarked date of this letter, prior to reinspection:**

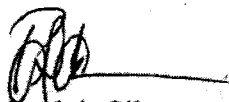
Remove the billboards, including the support/mount, from the property

If the violation is corrected, this matter will be closed. However, if the violation is not corrected, **you will be charged \$104.00** and an abatement hearing will be scheduled. If an Abatement Order is issued, all costs associated with the administrative hearing and possible escalating fines will be charged to the property owner(s).

Only the property owner(s) may appeal this action within **ten (10) calendar days from the postmarked date of this letter.** A copy of the Ordinance is enclosed for your reference.

If you have any questions concerning this matter, contact me at (510) 670-6663.

Your cooperation is appreciated.


Paul da Silva
Investigator
Code Enforcement Division

Enclosure(s)

xc: Lockaway Storage, 8555 Dublin Canyon Rd., Castro Valley CA 94552

EXHIBIT 2

EXHIBIT 2



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT
CODE ENFORCEMENT DIVISION

Chris Bazar
Agency Director

September 28, 2017

Albert Lopez
Planning Director

224 West Winton Ave
Room 111

Hayward, California
94544-1215

phone
510.670.5400
fax
510.785-8793

www.acgov.org/cda

Michael C. Shaw
32 Seascape Village
Aptos, CA 95003

Subject: Declaration of Public Nuisance - Notice to Abate
Property: 8555 Dublin Canyon Rd., Castro Valley CA 94552
APN: 085A-0800-008-01

As a result of an inquiry, the undersigned Code Enforcement Officers conducted site visits of the above-referenced property on September 22, 2017 and September 27, 2017 to evaluate whether a violation of the Alameda County Zoning Ordinance exists. Upon review of the condition of the property and the applicable provisions of the County of Alameda's land use regulations, the Code Enforcement Officers have determined that violations exist on the property. The specific violations are:

1. **Four unauthorized signs, including support structures**, in violation of Alameda County Zoning Ordinance Section 17.18.120 (requiring use of land in planned development district to conform to the approved land use and development plan) and Ordinance No. O-89-3 (establishing the development plan for the 1833rd Zoning Unit, which includes the subject property). Photographs of these signs are attached to this notice.
2. **One unauthorized digital billboard, including support structure**, in violation of Alameda County Zoning Ordinance Section 17.18.120 (requiring use of land in planned development district to conform to the approved land use and development plan); Ordinance No. O-89-3 (establishing the development plan for the 1833rd Zoning Unit, which includes the subject property); and Alameda County Zoning Ordinance Section 17.52.515 (regulating billboards). A photograph of this billboard is attached to this notice.

In order to bring your property into compliance, the following measure(s) must be taken within **ten (10) days from the postmarked date of this letter, prior to re-inspection:**

Remove the five signs identified above, including support structures.

If the violations are corrected, this matter will be closed. However, if the violations are not corrected, the property owner(s) will be charged the staff cost for each failed re-inspection, currently \$140.00 per hour. In addition, fines will be charged to the property owner(s), **starting at \$250.00 and increasing for each failed re-inspection** pursuant to the fines and fees schedule set forth in Section 17.59.200 of the Zoning Ordinance.

Declaration of Public Nuisance - Notice to Abate

September 28, 2017

Page 2

Only the property owner(s) may appeal this action in writing within **ten (10) calendar days** from the postmarked date of this letter by submitting an appeal letter plus an appeal fee of **\$50.00 to the Planning Department**. Copies of the ordinance provisions cited above are enclosed for your reference.

If you have any questions concerning this matter, contact us at (510) 670-6663.

Your cooperation is appreciated.



Paul da Silva
Investigator, Code Enforcement Division
Planning Department



Rodrigo Orduña
Assistant Planning Director &
Code Enforcement Officer
Planning Department

Enclosure(s)

cc: Lockaway Storage, 8555 Dublin Canyon Rd., Castro Valley CA 94552

