

**FIRM / AFFILIATE OFFICES**

Beijing	Moscow
Boston	Munich
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	Rome
Frankfurt	San Diego
Hamburg	San Francisco
Hong Kong	Seoul
Houston	Shanghai
London	Silicon Valley
Los Angeles	Singapore
Madrid	Tokyo
Millan	Washington, D.C.

July 13, 2018

**VIA ELECTRONIC MAIL AND FEDEX**

James T. Butts, Jr., Chairperson  
George Dotson, Board Member  
Ralph L. Franklin, Board Member  
Eloy Morales, Board Member  
Alex Padilla, Board Member  
Successor Agency to the Former Inglewood Redevelopment Agency  
1 W. Manchester Boulevard  
Inglewood, CA 90301

Re: Demand to Cure Violation of the Ralph M. Brown Act

Dear Members of the Successor Agency:

On behalf of MSG Forum, LLC, and pursuant to Government Code Sections 54960 and 54960.1, we demand that the Successor Agency to the Former Inglewood Redevelopment Agency (the "Successor Agency") cure the violation of the Ralph M. Brown Act (Government Code Section 54950 *et seq.*) (the "Brown Act") that the Successor Agency committed at the improperly agendized meeting held on June 19, 2018 (the "Meeting").

The description on the Successor Agency agenda for Item CSA-3 read as follows:

**A. CSA-3. OFFICE OF THE EXECUTIVE DIRECTOR**

Staff report recommending approval to request that the Oversight Board for the Successor Agency of the Former Inglewood Redevelopment Agency adopt a Resolution, directing the Successor Agency to implement the State of California Department of Finance approved Long-Range Property Management Plan, as amended, with respect to the Long-Term Use and Disposition of the LAX Noise Mitigation Properties, B-1.1 through and including B-3, representing Parcels 1 through and including 13, subject to the applicable disposition requirements of the Federal Aviation Administration grant agreements and Los Angeles World Airports letter agreements.

LATHAM & WATKINS LLP

This description is vague, ambiguous, misleading and insufficient to put the public on notice of the action the Successor Agency might take at the Meeting.

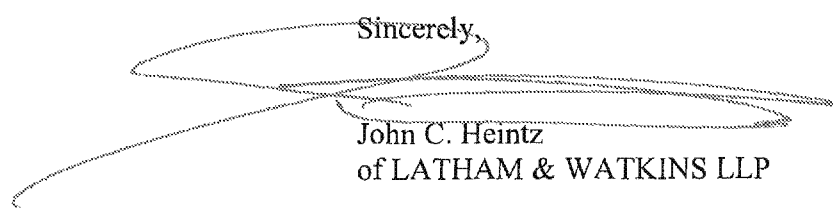
The public could not understand that the properties referenced in the agenda are in fact the very properties proposed for a Clippers basketball arena and are subject to an "Exclusive Negotiating Agreement" between the Successor Agency, the City of Inglewood, and Murphy's Bowl LLC ("Murphy's Bowl"). There is no reference to the Exclusive Negotiating Agreement, to Murphy's Bowl, to the Clippers, or to the proposed basketball arena in the agenda description.

The agenda description also includes vague and uninformative references to "applicable disposition requirements of the Federal Aviation Administration grant agreements and Los Angeles World Airports letter agreements." However, there is no information about those agreements -- what they require, who is a party to the agreements, the date of the agreements, agreement numbers, where the agreements might be available to review, etc. In short, given the description of CSA-3 on the Meeting agenda, the public could not reasonably determine how the "LAX Noise Mitigation Properties" might be disposed of, to whom they might be disposed to, for what purpose they would be disposed, or the requirements or obligations that might be imposed on any disposal.

This violation by the Successor Agency is part of a pattern of violations of the Brown Act by the City and the Successor Agency. The "hide the ball" approach of the agenda's description is inconsistent with the Brown Act, and we demand that the Successor Agency immediately cure the violation by rescinding the action taken on Meeting Item CSA-3 and complying with the Brown Act prior to taking action with respect to the "LAX Noise Mitigation Properties."

Government Code Section 54960.1 requires the Successor Agency either to cure or correct its actions, or to inform us of its intent not to do so, within 30 days from the receipt of this demand. If the Successor Agency fails to cure or correct its violations as demanded and required by law, our client intends to seek judicial invalidation of the action (along with its costs and reasonable attorneys' fees) pursuant to Government Code Section 54960.1.

Sincerely,



John C. Heintz  
of LATHAM & WATKINS LLP

cc: City of Inglewood c/o City Clerk (via electronic mail only)  
✓ Olga J. Castañeda, Deputy Clerk, County of Los Angeles, Board of Supervisors,  
Acting as Secretary to the Oversight Board (via electronic mail only)  
Jackie Lacey, District Attorney  
Allan Yochelson, Public Integrity Division  
Michelle Gilmer, Public Integrity Division  
George J. Mhlsten, Latham & Watkins LLP