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 United States Attorney  
 2 MACK E. JENKINS  
 Assistant United States Attorney  
 3 Chief, Criminal Division  
 LINDSEY GREER DOTSON (Cal. Bar No. 266973)  
 4 THOMAS F. RYBARCZYK (Cal. Bar No. 316124)  
 MICHAEL J. MORSE (Cal. Bar No. 291763)  
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 6 1500 United States Courthouse  
 312 North Spring Street  
 7 Los Angeles, California 90012  
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 9 thomas.rybarczyk@usdoj.gov  
 michael.morse@usdoj.gov

10 Attorneys for Plaintiff  
 11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,  
 15 Plaintiff,  
 16 v.  
 17 MARK RIDLEY-THOMAS,  
 18 Defendant.

No. CR 21-00485-DSF-1

DECLARATION OF ASSISTANT UNITED STATES ATTORNEY LINDSEY GREER DOTSON AND EXHIBITS FILED IN SUPPORT OF THE GOVERNMENT'S SENTENCING POSITION FOR DEFENDANT MARK RIDLEY-THOMAS

21 Plaintiff United States of America, by and through its counsel  
 22 of record, the United States Attorney for the Central District of  
 23 California and Assistant United States Attorneys Lindsey Greer  
 24 Dotson, Thomas F. Rybarczyk, and Michael J. Morse, hereby files the

25 ///  
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1 Declaration of Assistant United States Attorney Lindsey Greer Dotson  
2 and Exhibits Filed in Support of the Government’s Sentencing Position  
3 for Defendant Mark Ridley-Thomas.

4 Dated: August 7, 2023

Respectfully submitted,

5 E. MARTIN ESTRADA  
6 United States Attorney

7 MACK E. JENKINS  
8 Assistant United States Attorney  
9 Chief, Criminal Division

10 /s/ Lindsey Greer Dotson  
11 LINDSEY GREER DOTSON  
12 THOMAS F. RYBARCZYK  
13 MICHAEL J. MORSE  
14 Assistant United States Attorneys

15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA  
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**DECLARATION OF LINDSEY GREER DOTSON**

I, LINDSEY GREER DOTSON, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.

2. Attached hereto are true and accurate copies of exhibits 760 through 766 and 905, which were government exhibits marked but not admitted at trial. Unredacted copies of exhibits 760 through 766 were manually filed under seal at docket number 235.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and that this declaration is executed at Los Angeles, California, on August 7, 2023.

  
LINDSEY GREER DOTSON

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**EXHIBIT 760**

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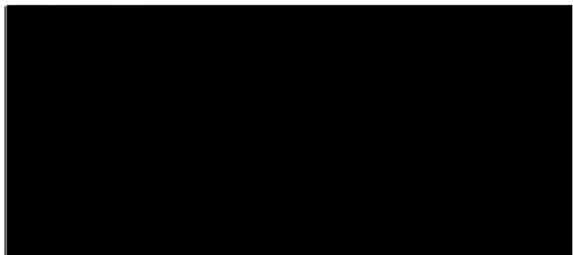
**From:** [REDACTED]  
**To:** Mark Ridley-Thomas [REDACTED]  
**Sent:** 2/23/2018 11:41:06 AM  
**Subject:** [REDACTED]  
**Attachments:** 121278.pdf

Sheila is up to it again. Attached is her motion that will be before the Board on Tues re: Short Term Rentals. (it was strangely seconded by Kathryn). As you know, I have been working for 3 years for my client [REDACTED] to get reasonable regulations in the City of LA. Should be done by the end of summer.

We are asking that you add an amendment to the Motion. The amendment would be to get an additional "therefore ...request" to add in an analysis of economic benefits to the County / potential TOT revenues by allowing and regulating STRs and to report closely on what the City of LA doing on this matter.

I am in NYC –back on Sunday. I will call you over the weekend or on Monday.

Thanks!



AGN. NO. \_\_\_\_\_

MOTION BY SUPERVISORS SHEILA KUEHL AND  
KATHRYN BARGER

February 27, 2018

**Short Term Rentals**

The increasingly serious affordable housing crisis in Los Angeles County (County) has been further exacerbated by the meteoric rise in the use of short term rentals. Companies such as Airbnb, HomeAway, FlipKey, onefinestay, and VRBO connect owners to travelers and visitors for short-term rentals of residential units, which removes otherwise affordable rental units from the market for long term occupancy. In some cases, single lessors rent entire apartments and homes as short term rentals. In other cases, leasing companies rent out several units in multi-unit buildings. The Los Angeles Alliance for a New Economy (LAANE) reports that the success of short-term rentals cause landlords to take rental units off the market, which can greatly impact rents and rental vacancy rates within a neighborhood.

Unregulated short term rentals can also destabilize neighborhoods and create serious quality of life impacts due to increased traffic, crowded parking, and greater noise, as well as increased fire risk from out of town occupants unaware of the risks associated with high fire severity zones. Short term rentals get an unintended boost

**MOTION**

Solis	_____
Ridley-Thomas	_____
Hahn	_____
Barger	_____
Kuehl	_____

from the fact that they are not subject to the same health and safety regulations as hotels and, if unregulated, do not remit Transient Occupancy Tax (TOT). This fact alone has amounted to several million dollars in lost revenue for the County each year. In 2016, the City of Los Angeles instituted a 14 percent transient occupancy tax (TOT) on Airbnb units under a three-year agreement. The City has already generated \$13 million in revenue, of which a portion has been used to support rapid re-housing programs for the homeless.

Many cities across the state, including the City of Los Angeles, have ordinances to regulate short term rental activities. Adopting an ordinance regulating short term rentals will help ease the burden on our affordable rental stock and rents, and ensure that such rentals do not create an undue burden on existing residents and neighborhoods.

**WE, THEREFORE, MOVE** that the Board of Supervisors direct the Chief Executive Officer (CEO) in conjunction with County Counsel, the Departments of Regional Planning and Public Health, and the Treasurer and Tax Collector to report back in writing within 180 days with recommendations for regulating short term rentals. The report should include the following elements:

1. An assessment of the impact of short term rentals on affordable residential rental stock in the unincorporated areas;
2. A survey of other jurisdictions' short term rental ordinances;
3. A survey of stakeholder opinions; and
4. An estimated cost to regulate and enforce short term rentals along with an estimate of potential new revenues from TOT.

S: NE/Short Term Rentals

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**EXHIBIT 761**



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**From:** [REDACTED]  
**To:** Mark Ridley-Thomas <mrtempower@aol.com>  
**Sent:** 2/26/2018 9:18:02 PM  
**Subject:** RE: Amendment to STR Motion

I move that the motion be amended to add that the study on Short Term Rentals include an analysis of the economic benefits that Short Term Rentals may bring to the County. Such benefits may include increased tourism, increased spending by Short Term Rental guests in neighborhoods , and revenue to the County if Short Term Rental platforms such as [REDACTED] pay TOT to the County as hotels do now. In addition, the study should include a detailed report of what action the City of Los Angeles takes on STRs.

[REDACTED]

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**From:** Mark Ridley-Thomas [REDACTED]  
**Sent:** Monday, February 26, 2018 9:08 PM  
**To:** [REDACTED]  
**Subject:** [REDACTED]

Does not read well. Not clear.

Sent from my iPhone

On Feb 23, 2018, at 11:41 AM, [REDACTED] > wrote:

Sheila is up to it again. Attached is her motion that will be before the Board on Tues re: Short Term Rentals. (it was strangely seconded by Kathryn). As you know, I have been working for 3 years for my client [REDACTED] to get reasonable regulations in the City of LA. Should be done by the end of summer.

We are asking that you add an amendment to the Motion. The amendment would be to get an additional "therefore ...request" to add in an analysis of economic benefits to the County / potential TOT revenues by allowing and regulating STRs and to report closely on what the City of LA doing on this matter.

I am in NYC –back on Sunday. I will call you over the weekend or on Monday.

Thanks!

[REDACTED]

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**EXHIBIT 762**

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**From:** Mark Ridley-Thomas [REDACTED]  
**To:** [REDACTED]@lacounty.gov [REDACTED]  
**BCC:** [REDACTED]  
**Sent:** 2/27/2018 7:59:29 PM  
**Subject:** Item 10 Today

I considered making this amendment but felt that it was to some extent covered in the motion.

"I move that the motion be amended to add that the study on Short Term Rentals include an analysis of the economic benefits that Short Term Rentals may bring to the County. Such benefits may include increased tourism, increased spending by Short Term Rental guests in neighborhoods, and revenue to the County if Short Term Rental platforms such as [REDACTED] pay TOT to the County as hotels do now. In addition, the study should include a detailed report of what action the City of Los Angeles takes on STRs."

Let me know if you think the motion covers these concerns. I kind of wish that I had offered the amendment after the testimony which I found rather compelling. Did you?

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**EXHIBIT 763**

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**From:** Mark Ridley-Thomas [REDACTED]  
**To:** [REDACTED]  
**BCC:** [REDACTED]  
**Sent:** 2/28/2018 4:13:51 PM  
**Subject:** Fwd: Item 10 Today  
**Attachments:** [REDACTED]\_LA\_Economic\_Impact-.pdf

You make me work too hard. Mercy! Do not share this with ANYONE. 😊

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] [lacounty.gov](mailto:[REDACTED]@lacounty.gov)>  
**Date:** February 28, 2018 at 2:27:15 PM PST  
**To:** Mark Ridley-Thomas [REDACTED]  
**Subject:** RE: Item 10 Today

Supervisor, I asked [REDACTED], who is working on this issue, what he thought. We agree that the motion did not specifically address the issue of economic benefits accruing from short-term rentals. However, [REDACTED] believes that the issue will arise under the category of stakeholder opinions; and he intends to address the economic issues in the report back. He also believes that the risk to the short-term rental market is not the transient occupancy tax (TOT). Rather, he thinks it is the regulatory conditions that might limit how many days a property can be rented annually and how many days an owner must live within the unit during a given calendar year, which will have an economic impact, and will need to be addressed in the report back.

Lastly, LAEDC recently issued a report that focuses specifically on the economic impact of [REDACTED] (and other such companies) in Los Angeles. [REDACTED] thinks that LAEDC has over-stated some of their statistical arguments, but that the report shows that this issue is front-and-center in the short-term rental discussion. A copy of the report is attached.

Hope this helps.

[REDACTED]

-----Original Message-----

**From:** Mark Ridley-Thomas [REDACTED]  
**Sent:** Tuesday, February 27, 2018 7:59 PM  
**To:** [REDACTED] [lacounty.gov](mailto:[REDACTED]@lacounty.gov)>  
**Subject:** Item 10 Today

I considered making this amendment but felt that it was to some extent covered in the motion.

“I move that the motion be amended to add that the study on Short Term Rentals include an analysis of the economic benefits that Short Term Rentals may bring to the County. Such benefits may include increased tourism, increased spending by Short Term Rental guests in neighborhoods, and revenue to the County if Short Term Rental platforms such as [REDACTED] pay TOT to the County as hotels do now. In addition, the study should include a detailed report of what action the City of Los Angeles takes on STRs.”

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**EXHIBIT 764**



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**From:** [REDACTED]  
**To:** Mark Ridley-Thomas [REDACTED]  
**Sent:** 2/28/2018 6:38:24 PM  
**Subject:** RE: Item 10 Today

Thank you. Mum, is the word

[REDACTED]

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**From:** Mark Ridley-Thomas [REDACTED]  
**Sent:** Wednesday, February 28, 2018 4:14 PM  
**To:** [REDACTED]  
**Subject:** Fwd: Item 10 Today

You make me work too hard. Mercy! Do not share this with ANYONE. 😊

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED] <[REDACTED]@lacounty.gov>  
**Date:** February 28, 2018 at 2:27:15 PM PST  
**To:** Mark Ridley-Thomas [REDACTED]  
**Subject:** RE: Item 10 Today

Supervisor, I asked [REDACTED], who is working on this issue, what he thought. We agree that the motion did not specifically address the issue of economic benefits accruing from short-term rentals. However, [REDACTED] believes that the issue will arise under the category of stakeholder opinions; and he intends to address the economic issues in the report back. He also believes that the risk to the short-term rental market is not the transient occupancy tax (TOT). Rather, he thinks it is the regulatory conditions that might limit how many days a property can be rented annually and how many days an owner must live within the unit during a given calendar year, which will have an economic impact, and will need to be addressed in the report back.

Lastly, LAEDC recently issued a report that focuses specifically on the economic impact of [REDACTED] (and other such companies) in Los Angeles. [REDACTED] thinks that LAEDC has over-stated some of their statistical arguments, but that the report shows that this issue is front-and-center in the short-term rental discussion. A copy of the report is attached.

Hope this helps.

[REDACTED]

-----Original Message-----

**From:** Mark Ridley-Thomas [REDACTED]  
**Sent:** Tuesday, February 27, 2018 7:59 PM  
**To:** [REDACTED] <[REDACTED]@lacounty.gov>  
**Subject:** Item 10 Today



I considered making this amendment but felt that it was to some extent covered in the motion.

"I move that the motion be amended to add that the study on Short Term Rentals include an analysis of the economic benefits that Short Term Rentals may bring to the County. Such benefits may include increased tourism, increased spending by Short Term Rental guests in neighborhoods, and revenue to the County if Short Term Rental platforms such as [REDACTED] pay TOT to the County as hotels do now. In addition, the study should include a detailed report of what action the City of Los Angeles takes on STRs."

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**EXHIBIT 765**

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**From:** [REDACTED]  
**To:** Mark Ridley-Thomas [REDACTED]  
**Sent:** 3/16/2018 9:32:08 AM  
**Subject:** FW: PRPI + [REDACTED]

We had a very good conversation with [REDACTED] yesterday; will keep you posted



**From:** Sebastian Ridley-Thomas [REDACTED]  
**Sent:** Friday, March 16, 2018 7:28 AM  
**To:** [REDACTED].com  
**Cc:** [REDACTED]  
**Subject:** PRPI + [REDACTED]

Dear [REDACTED],

Thank you for taking time to meet. I wanted to follow-up on the Policy, Research, and Practice Initiative's (PRPI) relaunch and potential for partnership with [REDACTED].

PRPI is statewide in scope. Our relevance is primarily as a thought partner on voter attitudes and convener of civic visioning activities.

Our mission is to elevate the interests of Black Californians in civic affairs with focus groups, public policy polling, and policy analysis/development. Given my own background, I endeavor to include Black millennials in a prominent way in PRPI's work through digital communications and issues that speak to our concerns.

PRPI is a project of the United Ways of California and aligns itself with anti-poverty, social equity, and inclusion work.

Our donor base is diverse and has primarily come from corporate philanthropy.

Please let me know if you have additional questions.

Sincerely,

Sebastian Ridley-Thomas  
Director  
Policy, Research, and Practice Initiative  
A Project of the United Ways of California

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Original Write Up

**Project Description**

The Policy, Research, and Practice Initiative (PRPI) is an African American-focused effort on polling, voter research, civic engagement, policy analysis, and democracy-building.

Launched in 2015, PRPI conducted the first statewide poll of African American voter attitudes in California history. PRPI provides critical input on pressing state and local public policy considerations effecting African American Californians.

The policy areas of general focus include: employment, income inequality, education, economic opportunity, criminal justice reform, homelessness, and healthcare reform.

Census 2020, redistricting, state budget, statewide ballot propositions and millennial empowerment are areas of attention.

PRPI convenes thought leaders and representatives of the media to inform the civic, socio-economic, and multi-cultural conversations of the day.

**Major 2018 Projects**

PRPI Launch (March 30)

Lieutenant Gubernatorial Debate (April 2018)

Statewide Primary Election 2018 Issue Polling (Mid-Late April 2018)

State of Black California (July 2018)

The Black Voter Issue Summit (August 2018)

Regional Issue Focus Groups (Summer 2018)  
(Los Angeles County, East San Francisco Bay Area, Sacramento, Inland Empire, San Diego)

Statewide General Election 2018 Issue Polling (September 2018)

Black Millennial Policy Perspectives Summit (October 2018)

**Structure**

Fiscal Agent (United Ways of California)

Two Staff Persons

Project Vendors

Digital Communications Apparatus

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**EXHIBIT 766**

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**From:** Sebastian Ridley-Thomas [REDACTED]  
**To:** Mark Ridley-Thomas [REDACTED]  
**Sent:** 3/19/2018 7:54:47 AM  
**Subject:** PRPI \$\$\$

PRPI Constituencies

[REDACTED] - 50k\*  
*The realities of the Black electorate.*

[REDACTED] - 50k\*  
*House sharing and gentrification.*

[REDACTED] - 50k  
*IIASC focus groups on behavioral health.*

[REDACTED] - 50k\*  
*Education elevation in civic discourse.*

[REDACTED] - 25k\*  
*Ambulance company concerns about cannabis.*

[REDACTED] - 25k\*  
*Perspectives on DWP, public employment, energy (and green energy), and jobs/the economy.*

[REDACTED] - 25k  
*Gas tax, infrastructure, jobs.*

[REDACTED] - 25k  
*Environment, energy, and African Americans.*

[REDACTED] - 25k [REDACTED]  
*Recycling and African Americans.*

[REDACTED] - 25k [REDACTED]  
*Fair housing, rent control and African Americans*

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**EXHIBIT 905**

Message

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**From:** [REDACTED]@stoel.com]  
**Sent:** 4/24/2018 9:28:07 AM  
**To:** [REDACTED]@porterscott.com) [REDACTED]  
**CC:** [REDACTED]@asm.ca.gov]  
**Subject:** FW: Sebastian Ridley-Thomas [S-R.0067053.00001]  
**Attachments:** Dr. Mallouk letter (01772711x9DF46).pdf

Hello, [REDACTED] When we last communicated, you had indicated that Mr. Ridley-Thomas was still recovering from surgery, and his doctors had not released him to engage in work-related activity. I hope that he is doing well. At this point, I have completed all the witness interviews other than Mr. Ridley-Thomas. Is he now available for an interview with me?

[REDACTED]

---

**From:** [REDACTED]@porterscott.com]  
**Sent:** Friday, February 02, 2018 4:18 PM  
**To:** [REDACTED]  
**Subject:** Sebastian Ridley-Thomas

Dear Ms. Thomas,

As indicated in earlier communications, Mr. Ridley-Thomas underwent surgery on December 18, 2017. He is still recuperating and has not reached the point where his physicians have released him to engage in work-related activity or travel. I am providing a letter from his treating physician to that effect.

[REDACTED]

USAO\_387271  
[REDACTED]

CONFIDENTIAL INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER

**Exhibit 905**

**Page 1 of 2**





1/25/2018

Re: Sebastian Ridley-Thomas


[REDACTED]  
Los Angeles CA 90008

To whom it may concern

On December 18, 2017, Mr Sebastian Ridley-Thomas underwent surgery for a serious medical condition. He is now recuperating, and I anticipate that the process will continue until end of March 2018.

During the period of recuperation, he needs to rest and avoid any work-related activity. I also do not recommend out-of-town travel until he has fully recovered from the surgery.

Sincerely,

  
GEORGE MICHEL MALLOUK MD  
Kaiser West Los Angeles  
Internal Medicine

[REDACTED]

USAO\_387272  
[REDACTED]

CONFIDENTIAL INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER

**Exhibit 905**

**Page 2 of 2**