

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
VA **DEPARTMENT 47**

Plaintiff,

vs.

TOWNE AND 333 LLC, A CALIFORNIA LIMITED
LIABILITY COMPANY

STEVE SUNGHO LEE M 03/05/1964
SMOKE TOKES LLC, A CALIFORNIA LIMITED
LIABILITY COMPANY
RAHEEL LAKHANY F 04/30/1983

Defendant(s).

MISDEMEANOR COMPLAINT

Case number: 0CJ01468
FILED
SHERRI R. CARTER
Executive Officer/Clerk

By _____
Deputy Clerk

Issued by
MICHAEL N. FEUER
City Attorney

By _____
SERENA CHRISTION (SC)
Deputy City Attorney

Comes now the undersigned and states that he is informed and believes, and upon such information and belief declares: That on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.105.6.14 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully store, process, or use materials above ground of the type and in the amounts exceeding those set forth in Table 57.105.6.14 of this chapter or exceeding the permit amounts for hazardous materials in Chapter 50, without a permit.

TCIS 57.105.6.14/01

COUNT 2

For a further, separate and second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.109 adopting California Fire Code section 109.1 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully erect, construct, alter, repair, remove, demolish, or utilize a building, occupancy, premises, or system regulated by the fire code, or caused same to be done, in conflict with or in violation of the provisions of the fire code.

TCIS 57.109.1/01

COUNT 3

For a further, separate and third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.110 adopting California Fire Code section 110.1.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully maintained a structure or existing equipment that are or hereafter become unsafe or deficient because of inadequate means of egress or which constituted a fire hazard, or was otherwise dangerous to human life or the public welfare, or which involve illegal or improper occupancy or inadequate maintenance.

TCIS 57.110.1.1/01

COUNT 4

For a further, separate and fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.120.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid did unlawfully have the operation or maintenance of a new or existing Unified Program Facility without having an annually renewable Unified Program Facility Permit with the appropriate authorization for each applicable unified program element pursuant to this Chapter, or other authorized Permit.

TCIS 57.120.3/01

COUNT 5

For a further, separate and fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.121.2.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid did unlawfully fail to file an application for, and obtain a Section 57.120 Unified Program Facility Permit with the proper authorization listed for the Hazardous Materials Release Response Plan (HMRRP) and inventory program element as required by this section. Existing Unified Program Facilities with existing authorizations for other Unified Program elements, shall file an application to amend their existing Section 57.120 Unified Program Facility Permit to include the HMRRP authorization. Section 57.120 Unified Program Facility Permits with HMRRP authorizations shall be obtained on or before the first day the business starts handling such substance and shall be renewed annually.

TCIS 57.121.2.1/01

COUNT 6

For a further, separate and sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.121.8 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to maintain at the business site for a period of not less than three years and to make available to the Chief upon request copies of all Hazardous Materials Inventory Forms.

TCIS 57.121.8/01

COUNT 7

For a further, separate and seventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 315 adopting California Fire Code Section 315.3.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to maintain storage 2 feet or more below the ceiling in non-sprinklered areas of buildings or a minimum of 18 inches (457 mm) below sprinkler head deflectors in sprinklered areas of buildings.

TCIS 57.315.3.1/01

COUNT 8

For a further, separate and eighth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.315.3.11 subsection (1) was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to maintain aisles and entrances free from storage and equipment not being used.

TCIS 57.315.3.11/01

COUNT 9

For a further, separate and ninth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.316 adopting California Fire Code section 316.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully intentionally design or alteration a building to disable, injure, maim or kill intruders is prohibited. A person shall not install and use firearms, sharp or pointed objects, razor wire, explosives, flammable or combustible liquid containers, or dispensers containing highly toxic, toxic, irritant or other hazardous materials in a manner that could passively or actively disable, injure, maim or kill a fire fighter who forcibly enters a building for the purpose of controlling or extinguishing a fire, rescuing trapped occupants or rendering other emergency assistance.

TCIS 57.316.3/01

COUNT 10

For a further, separate and tenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.316.4.2 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully install or maintain any wire, barbed wire, razor ribbon, fence, cable, aerial, antenna, or other obstruction on any building roof, parapet wall, or openings in an exterior wall required for Fire Department access, in such a manner as to obstruct access or egress, or cause a hazardous condition in the event of fire or other emergency.

TCIS 57.316.4.2/01

COUNT 11

For a further, separate and eleventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.324.4 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), having ownership, operation, charge or control of any device appliance, apparatus, equipment, tank, vehicle, vessel, building, structure, business, or premises failed to 1. Release or transfer any flammable liquid, combustible liquid, liquefied flammable gas, or any other hazardous material or substance in such a manner as to give rise to a fire, explosion, panic, or other hazardous condition; or 2. Use any tank, tank vehicle, cargo tank, tank trailer, tank car, and any device, appliance, apparatus, or equipment used in conjunction therewith, when leaking or in such state of disrepair as to cause a leak.

TCIS 57.324.4/01

COUNT 12

For a further, separate and twelfth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.325.1 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), having ownership, charge or control of any device appliance, apparatus, equipment, tank, vehicle, vessel, building, structure, business, or premises which is in such condition as to cause a fire, explosion or life hazard, failed after having been notified in writing by the Chief that he or she must forthwith eliminate or remedy such condition or make changes, alterations, or repairs as may be necessary to render the same safe and to eliminate such dangerous condition of fire, explosion or life hazard, maintain or use any such device, appliance, apparatus, equipment, tank, vehicle, vessel, building, structure, business or premises until he has complied with the terms of such notice.

TCIS 57.325.1/01

COUNT 13

For a further, separate and thirteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.506 adopting California Fire Code Section 506.1.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to install on gates or similar barrier approved locks as required by the fire code official.

TCIS 57.506.1.1/01

COUNT 14

For a further, separate and fourteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.110.4 of the Los Angeles Municipal Code who at the time and place last aforesaid, being the owner, operator or occupant of a building or premises deemed unsafe by the fire code official did unlawfully fail to abate or cause to be abated or corrected such unsafe conditions either by repair, rehabilitation, demolition or other approved corrective action as required by Section 110.4 of the California Fire Code.

TCIS 57.110.4/01

COUNT 15

For a further, separate and fifteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 509 adopting California Fire Code Section 509.1.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to have gas shut off valves, electric meters, service switches and other utility equipment clearly and legibly marked to identify the unit or space that it serves.

TCIS 57.509.1.1/01

COUNT 16

For a further, separate and sixteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at

and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.509.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown, unlawfully failed to provide access to sprinkler valves, standpipes, and other fire protection equipment provided in storage areas shall be served by either a main aisle, side aisle, or an aisle with a minimum width of 3 feet.

TCIS 57.509.3/01

COUNT 17

For a further, separate and seventeenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 603 adopting California Fire Code Section 603.7.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did as a person, user, firm or agent did unlawfully utilize any device or appliance (the operation of which has been discontinued or ordered discontinued in accordance with Section 603.7) unless written authority to resume operation is given by the fire code official. Removing or breaking the means by which operation of the device is prevented shall be a violation of this code.

TCIS 57.603.7.1/01

COUNT 18

For a further, separate and eighteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 603.10.2 was committed by the above-named defendant(s),

(whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully have heating or lighting apparatus or equipment capable of igniting flammable materials of the types stored or handled that was used in the storage areas of any warehouse storing rags, cotton, hay, excelsior, hair, or other flammable or combustible material; or in the work areas of any shop or factory used for the manufacture, repair or renovating of mattresses or bedding; or in the work areas of any establishment used for the upholstering of furniture.

TCIS 57.603.10.2/01

COUNT 19

For a further, separate and nineteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.605 adopting California Fire Code section 605.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to have a working space not less than 30 inches in width, 36 inches in depth and 78 inches in height in for not electrical service equipment, or where the electrical service equipment is wider than 30 inches, failure to have a working space larger than the width of the equipment, or storage of material located within the designated working space.

TCIS 57.605.3/01

COUNT 20

For a further, separate and twentieth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal

Code Section 605 adopting California Fire Code Section 605.5 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to have extension cords and flexible cords as a substitute for permanent wiring; or extension cords and flexible cords affixed to structures, extended through walls, ceiling or floors, or under doors or floor coverings; or such cords that are subject to environmental damage or physical impact.

TCIS 57.605.5/01

COUNT 21

For a further, separate and twenty-first cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.901 adopting California Fire Code section 901.6 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully failure to inspect, test and maintain repair or replace fire protection systems pursuant to the section.

TCIS 57.901.6/01

COUNT 22

For a further, separate and twenty-second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.901 adopting California Fire Code section 901.7 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to notify the fire department and the

fire code official notified immediately and, where required by the fire code official, the building shall be either evacuated or an approved fire watch shall be provided for all occupants left unprotected by the shutdown until the fire protection system has been returned to service. Where utilized, fire watches shall be provided with not less than one approved means for notification of the fire department and their only duty shall be to perform constant patrols of the protected premises and keep watch for fires

TCIS 57.901.7/01

COUNT 23

For a further, separate and twenty-third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.903.1.2 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully fail provide spare sprinklers heads as required by the Fire Code.

TCIS 57.903.1.2/01

COUNT 24

For a further, separate and twenty-fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.903.5.2 of Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully use sprinkler heads to hang or support anything from them.

TCIS 57.903.5.2/01

COUNT 25

For a further, separate and twenty-fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.903 adopting California Fire Code 903.2.7.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully fail to provide a sprinkler system as required in Chapter 32 in all buildings of Group M where storage of merchandise is in high-piled or rack storage arrays.

TCIS 57.903.2.7.1/01

COUNT 26

For a further, separate and twenty-sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.1024 adopting California Fire Code section 1024.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully use an exit passageway for any purpose other than as a means of egress and a circulation path.

TCIS 57.1024.1/01

COUNT 27

For a further, separate and twenty-seventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 57.1031 of the Los Angeles Municipal Code adopting Section 1031.2 of the California Fire Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully fail to maintain a means of egress, where the building is occupied, free from obstructions or impediments to full instant use in the case of fire or other emergency.

TCIS 57.1031.2/01

COUNT 28

For a further, separate and twenty-eighth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3201 adopting California Fire Code section 57.3201.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), did unlawfully fail to, at the time of building permit application for new structures designed to accommodate high-piled storage or for requesting a change of occupancy/use, and at the time of application for a storage permit, plans and specifications shall be submitted for review and approval. In addition to the information required by the California Building Code, the storage permit submittal shall include the information specified in this section. Following approval of the plans, a copy of the approved plans shall be maintained on the premises in an approved location .

TCIS 57.3201.3/01

COUNT 29

For a further, separate and twenty-ninth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3205 adopting California Fire Code section 57.3205.4 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully, when not restocking, failed to keep aisles clear of storage, waste material and debris. Fire department access doors, aisles and exit doors shall not be obstructed. During restocking operations using manual stocking methods, a minimum unobstructed aisle width of 24 inches (610 mm) shall be maintained in 48-inch (1219 mm) or smaller aisles, and a minimum unobstructed aisle width of one-half of the required aisle width shall be maintained in aisles greater than 48 inches (1219 mm). During mechanical stocking operations, a minimum unobstructed aisle width of 44 inches (1118 mm) shall be maintained in accordance with Section 3206.9 of the California Fire Code.

TCIS 57.3205.4/01

COUNT 30

For a further, separate and thirtieth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3206 adopting California Fire Code section 57.3206.4 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to provide automatic sprinkler systems in accordance with California Fire Code Sections 3207, 3208 and 3209.

TCIS 57.3206.4/01

COUNT 31

For a further, separate and thirty-first cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3206 adopting California Fire Code section 57.3206.6.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to provide fire department access doors in accordance with this section. Access doors shall be accessible without the use of a ladder.

TCIS 57.3206.6.1/01

COUNT 32

For a further, separate and thirty-second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3206 adopting California Fire Code section 57.3206.6.1.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to provide not less than one access door in each 100 linear feet (30 480 mm), or fraction thereof, of the exterior walls that face required fire apparatus access roads. The required access doors shall be distributed such that the lineal distance between adjacent access doors does not exceed 100 feet (30 480 mm).

Exception: The linear distance between adjacent access doors is allowed to exceed 100 feet (30 480 mm) in existing buildings where no change in occupancy is proposed. The number and distribution of access doors in existing buildings shall be approved.

TCIS 57.3206.6.1.1/01

COUNT 33

For a further, separate and thirty-third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3206 adopting California Fire Code section 57.3206.6.1.2 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to have access doors not less than 3 feet (914 mm) in width and 6 feet 8 inches (2032 mm) in height. Roll-up doors shall not be used unless approved.

TCIS 57.3206.6.1.2/01

COUNT 34

For a further, separate and thirty-fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.3206 adopting California Fire Code section 57.3206.9 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to provide aisles that provide access to exits and fire department access doors in high-piled storage areas exceeding 500 square feet (46 m²), in accordance with Sections 3206.9.1 through 3206.9.3. Aisles separating storage piles or racks shall comply with NFPA 13. Aisles shall also comply with Chapter 10. Exception: Where aisles are precluded by rack storage systems, alternate methods of access and protection are allowed when approved have access doors not less than 3 feet (914 mm) in width and 6 feet 8 inches (2032 mm) in height. Roll-up doors shall not be used unless approved.

TCIS 57.3206.9/01

COUNT 35

For a further, separate and thirty-fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5003 adopting California Fire Code section 57.5003.7.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to provide "No Smoking" signs as required by the Code.

TCIS 57.5003.7.1/01

COUNT 36

For a further, separate and thirty-sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5003 adopting California Fire Code section 57.5003.9.8 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to separate in storage and storage of materials that are incompatible with materials in use where the stored materials are in containers having a capacity of more than 5 pounds (2 kg) or 0.5 gallon (2 L). Separation shall be accomplished by:

1. Segregating incompatible materials in storage by a distance of not less than 20 feet (6096 mm).
2. Isolating incompatible materials in storage by a noncombustible partition extending not less than 18 inches (457 mm) above and to the sides of the stored material.
3. Storing liquid and solid materials in hazardous material storage cabinets.
4. Storing compressed gases in gas cabinets or exhausted enclosures in accordance with Sections 5003.8.5 and 5003.8.6. Materials that are

incompatible shall not be stored within the same cabinet or exhausted enclosure.

TCIS 57.5003.9.8/01

COUNT 37

For a further, separate and thirty-seventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5003 adopting California Fire Code section 57.5003.9.9 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to have shelving of substantial construction, and shelving that was braced and anchored in accordance with the seismic design requirements of the California Building Code for the seismic zone in which the material is located. Shelving shall be treated, coated or constructed of materials that are compatible with the hazardous materials stored. Shelves shall be provided with a lip or guard when used for the storage of individual containers.

Exceptions:

1. Storage in hazardous material storage cabinets or laboratory furniture specifically designed for such use.
 2. Storage of hazardous materials in amounts not requiring a permit in accordance with Section 5001.5.
- Shelf storage of hazardous materials shall be maintained in an orderly manner.

TCIS 57.5003.9.9/01

COUNT 38

For a further, separate and thirty-eighth cause of action being a different offense, belonging to the same class of crimes and offenses

set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5103 adopting California Fire Code section 57.5103.2 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to have aerosol cartons that were identified on not less than one side with the classification level of the aerosol products contained within the carton as follows:

LEVEL _____ AEROSOLS.

TCIS 57.5103.2/01

COUNT 39

For a further, separate and thirty ninth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5104 adopting California Fire Code section 57.5104.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed to comply with Sections 5104.2 through 5104.7 and NFPA 30B. Level 1 aerosol products and those aerosol products covered by Section 5104.1.1 shall be considered equivalent to a Class III commodity and shall comply with the requirements for palletized or rack storage in NFPA 13 for inside storage of Level 2 and 3 of aerosol products.

TCIS 57.5104.1/01

COUNT 40

For a further, separate and fortieth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of

California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5303 adopting California Fire Code section 57.5303.7 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), unlawfully failed have compressed gas containers, cylinders and tanks and systems in storage or use separated from materials and conditions that pose exposure hazards to or from each other. Compressed gas containers, cylinders, tanks and systems in storage or use shall be separated in accordance with Sections 5303.7.1 through 5303.7.11.2 of the California Fire Code.

TCIS 57.5303.7/01

COUNT 41

For a further, separate and forty-first cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5704 adopting California Fire Code section 5704.3.3 was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully fail to store flammable and combustible liquids inside building in container and portable tanks as required by the Code.

TCIS 57.5704.3.3/01

COUNT 42

For a further, separate and forty-second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/20/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.5704 adopting California Fire Code section 5704.3.4.1 was committed by the above-named defendant(s), (whose

true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully ,for occupancies other than Group M wholesale and retail sales uses, indoor storage of flammable and combustible liquids exceeded the maximum allowable quantities per control area indicated in Table 5003.1.1(1) and shall not exceed the additional limitations set forth in this section.

For Group M occupancy wholesale and retail sales uses, indoor storage of flammable and combustible liquids shall not exceed the maximum allowable quantities per control area indicated in Table 5704.3.4.1. Storage of hazardous production material flammable and combustible liquids in Group H-5 occupancies shall be in accordance with Chapter 27.

TCIS 57.5704.3.4.1/01

COUNT 43

For a further, separate and forty-third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 05/30/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Title 19 Section 3.05(b) of the California Code of Regulation was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully install or maintain any security barrier such as barbed wire fencing, razor wire fencing, chain link fencing, or any other fencing material, cable, aerial, antenna, or other obstruction on the roof of any commercial establishment in such a manner as to obstruct or render egress or access hazardous in the event of fire or other emergency.

MCI 19CCR 3.05/01

COUNT 44

For a further, separate and forty-fourth cause of action being a different offense, belonging to the same class of crimes and offenses

set forth in Count I hereof, affiant further alleges that on or about 06/25/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.110 adopting California Fire Code section 110.1 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully erect, construct, alter, repair, remove, demolish, or utilize a building, occupancy, premises, or system regulated by the fire code, or caused same to be done, in conflict with or in violation of the provisions of the fire code.

TCIS 57.110.1/01

COUNT 45

For a further, separate and forty-fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 06/25/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code Section 57.111 adopting California Fire Code section 111.1.1 was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), who at the time and place last aforesaid, did unlawfully maintained a structure or existing equipment that are or hereafter become unsafe or deficient because of inadequate means of egress or which constituted a fire hazard, or was otherwise dangerous to human life or the public welfare, or which involve illegal or improper occupancy or inadequate maintenance.

TCIS 57.111.1.1/01

COUNT 46

For a further, separate and forty-sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about

07/16/2020 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Los Angeles Municipal Code section 57.108.7.3 of the Los Angeles Municipal Code was committed by the above-named defendant(s), (whose true name(s) to affiant is (are) unknown), did unlawfully own or have charge or control of any items listed in Los Angeles Municipal Code Sections 57.108.7 and 57.108.7.1 maintained said items in defective condition or in a state of disrepair, or installed or maintained such in a manner that endangers life or creates a fire or explosion hazard; or failed to obey an order of the Chief to require periodic inspections as required by Section 57.108.7.2.1 to wit, Automatic Sprinkler.

TCIS 57.108.7.3/01