

Communication from Public

Name: Taxi Workers Association of Los Angeles

Date Submitted: 01/10/2022 11:55 AM

Council File No: 10-0996-S1

Comments for Public Posting: Dear City Councilmembers In 2017, with the growing popularity of Transportation Network companies, deteriorating conditions of the taxi industry and at the LADOT's urging, the City Council agreed to hiring of a consultant to recommend changes to the "permitting requirements, driver benefits, improved performance monitoring, and enhanced technology among other issues that are outlined in the scope of work". In September of 2019, after the release of the consultant's (Sam Schwartz Engineering) report (attachment), LADOT gathered the stakeholder's feedback (attachment) and with virtually no opportunity to change or amend the proposal, or examination of the consultant's hiring process or even a copy of the actual report, the Council approved replacing the franchise system with the "open market" regulatory scheme. Within months, cab drivers lost access to the LAX terminal curb and the COVID-19 pandemic devastated what was left of the taxi industry already decimated by the unfair and predatory competitors and city policies. The number of trips at LAX went from 249K per month in October of 2014 to 128K in October of 2019, to 67K in January 2020 and 2,6K by April 2020! The number of vehicles operating on the streets of the city was reduced from 2363 to barely a quarter of the fleet and the number of drivers went from 4100 in 2021-2013 to 780 in April of 2020. By the end of 2021, one authorized franchise with 269 taxicabs went out of business and others are operating with skeleton crews and with reduced fleet. In recent months, directed by the mayor's office with acquiescence of the City Attorney and in their zeal to ram through the uberization of the taxicab industry, LADOT and the Board of Taxicab Commissioners have abandoned any pretense of complying with the relevant rules and regulation, and exhibited utter indifference to the consequences of their actions on the drivers and the sustainability of the industry. Encouraged by the lack of oversight by the Council, despite concerns expressed by Councilman Bonin and others, not only has LADOT and the Board failed to live up to their contractual and statutory obligations under the Rate Ordinance and Franchise Agreements to collect data, which would enable them to make objective recommendations, they have stood in the way of transparency, which would allow the Council to make informed decisions. An excellent example of LADOT providing misleading information

to the Committee is its most recent report of January 6th, where the department claims that Government Code 53075.5 precludes the city from “implementing and enforcing a minimum wage for drivers” and that “LADOT cannot grant taxicabs access to the terminals at LAX”. In fact, this Government Code does not refer to wages at all, but rather addresses the rates customers are charged. Instead of allowing the market to determine the fleet size and fostering cutthroat competition, the city can and should implement the same livable wage standard through the granular data it already has access to. Similarly, while it is true that LADOT does not have the power over LAWA or the Airport Commission, these two agencies regularly work together cooperatively on issues of importance to the public. In this case, both the LADOT and the Board of Taxicab Commissioners, have refused to even address the issue, despite repeated calls from the stakeholders and even their own colleague on the Board. In order to complete their work on the new taxicab regulations, the Board has doubled down on their disdain for the city’s Administrative Code and the Brown Act in setting the date for hearing the stakeholders and their own colleague’s objections and in failing to post and make available to the public TWALA’s updated objections (attachment), related to the Board’s actions. Likewise, the Department moved forward with the implementation of the “light color scheme” for taxicabs which violate both the existing Municipal Code and California Vehicle code without consultation, providing legal justification or notice to the industry stakeholders. As we have warned again and again, without the Council’s direct involvement and oversight of the process and the new regulatory scheme, this undertaking is headed towards an unmitigated disaster for the City, the industry and the drivers. We urge the Councilman to take immediate actions to ensure compliance with relevant regulations, a thorough examination of legal issues and the impact of the LADOT proposal and the process, which has brought us to this point. On behalf of the Los Angeles taxi drivers, TWALA wants to express our gratitude to Professor Narro for his report and an earlier letter (attachment) in support of our demand for an enforceable livable wage standard for cab drivers and for the inclusion of TWALA as a key stakeholder in the regulatory process of reforming our industry. Sincerely, Leon Slomovic President, Taxi Workers Association of Los Angeles

Taxi Workers Association of Los Angeles

Email: twalaoc@gmail.com

November 23, 2021

Via Electronic Mail or U.S. Mail

Jasmin San Luis (jasmin.sanluis@lacity.org)
Acting Commission Executive Assistant
Board of Taxicab Commissioners
Department of Transportation
100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Re: **Tentative Taxicab Rules and Regulations**
Amended OBJECTIONS, Cure and Correct Demand and attachment(s) to the Los Angeles Board
of Taxicab Commissioners

This letter shall serve as timely Objections of the Taxi Workers Association of Los Angeles to the Tentative Taxicab Rules and Regulations approved by the Board of Taxicab Commissioners (Commission or Board) on October 26th, 2021 and published on October 28th, 2021. We have procedural objections to the process of adopting the Taxicab Rules and Regulations, as well as substantive objections to proposed new rules and the process of hearing our objections.

Pursuant to Los Angeles Administrative Code section 22.488(f)(8)B:

“The Secretary shall place all objections on the Taxicab Commission’s agenda for its next regular meeting after the expiration of the time for filing the objections, and the Commission shall then fix a date, not less than five days later, for hearing any and all objections, and shall, after the hearing, finally act on the proposed regulation by approving, changing or rejecting it, providing that any resolution of the Taxicab Commission approving any regulation shall be published once before becoming effective and shall be subject to the referendum provisions of the Charter relating to ordinances.”

Please place these objections on the agenda for the Commission’s next regularly scheduled meeting following the expiration of time for filing objections to the Tentative Order.

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On February 18th, 2021 Transportation Committee approved and on February 23rd, 2021 Council adopted a Report which stated:

“REQUEST the Board of Taxicab Commissioners in conjunction with LADOT to prepare and transmit to Council in 90 days a comprehensive set of rules and regulations for the proposed open market permitting system for consideration by the Transportation Committee.”

The report states:

“Committee members expressed concerns regarding the impact of the new open market permitting system on the incomes of taxicab drivers, conflicts with existing regulations”

that

*“The Department representative explained that **detailed** program rules are forthcoming, to be established by the Board of Taxicab Commissioners. **Concerns expressed by the industry will be addressed at that time.**”*

and

“Committee further recommended that Council request the Board of Taxicab Commissioners prepare and transmit to Council within 90 days the new rules and regulations that the Transportation Committee convene two meetings to discuss the impact of the rules on operations and on taxicab drivers.”

Below is a list of specific objections

Objections relative to form and legality of Tentative Rules and Regulations

Pursuant to section 21.16 of the Los Angeles Administrative code:

*“The powers conferred upon each board shall be **exercised by order or resolution** adopted by a majority of its members and recorded in the minutes with the ayes and noes at length. Such action shall be **attested by the signatures of the President** or Vice-President, or two members of the board, **and** by the signature of the **Secretary of the board.**”*

If the Tentative Rules and Regulations tentatively approved by the Board are to:

“Establish and prescribe by resolution regulations providing for the operation of, the extent, character and quality of service, the rates to be charged by and the extensions to be required of, any of those taxicab utilities...”

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pursuant to section 22.488(f)(8)B, then the procedures and 10/28/2021 publication of such regulations is **defective**, because this publication does not conform to the customary **format** of a Board order or Resolution, nor does it contain the necessary **attestation**, or an **effective date**.

Objections relative to the Board and the Department of Transportation failure to address concerns of the taxi drivers regarding “impact of the rules on operations and on taxicab drivers” as represented to the Transportation Committee

Despite repeated expressions of alarm conveyed to the Board and the Department regarding the effect of new regulations on driver wages, TWALA representatives’ legitimate demands for establishing a mechanism for ensuring livable wages for the taxi workers have been ignored throughout the rulemaking process. In fact, LADOT representatives have said that there are no plans to address this issue or to prepare a report, as directed by the Committee and the Council.

Objections relative to conflicts with existing regulations

Recently, without notice to all companies, LADOT has instituted a new “light color scheme” which includes “**non-painted**” vehicles and **private** (rather than commercial) license plates. These new regulations are in conflict with the existing Municipal Code which defines taxicabs and California Vehicle Code:

*LAMC Section 71.00 “**Taxicab**” shall mean every automobile or motor propelled vehicle which is designed to carry not more than eight persons, excluding the driver, and... used for the transportation of passengers for hire over the streets of this City...*”

CVC section 266 “A ‘commercial vehicle’ is a vehicle which is used or maintained for the transportation of persons for hire, compensation, or profit...”

Additionally, TWALA members have asked the LADOT, the Commission and the City Attorney’s office to reconcile cab drivers’ current **employment status as independent contractors** with the new regulations which allow companies to set prices, train drivers and set conditions of employment. Allowing companies such level of control over workers, inevitably leads to significant unresolved legal questions of **conflict with AB5, AB1069 and Federal Antitrust regulations**. Without legal analysis, the weight of resolving these issues will fall on taxi drivers, who are the least able to bear this burden.

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Also, the new **rule 215** of the Tentative Rules and Regulations may be in conflict with existing Municipal rules regarding commercial advertising on taxicabs.

Each Taxicab Services Company and vehicle permittee may display commercial advertising in or on the taxicab, which does not violate statutes involving unlawful or obscene matter, nor be detrimental to the public welfare

Objections relative to unlimited power LADOT and Commission have given themselves to arbitrarily change rules without oversight by the Council and unaccountable to stakeholders

LADOT “hands-off” approach to driver issues, low wages and capricious enforcement of the myriad of rules has been well documented in by UCLA Professors Blasi and Leavitt in 2009. In 2010 the Council’s attempt to reforms the industry and its regulations had failed because of procedural issues and allegations of favoritism. Nevertheless, between 2010 and 2013 taxicab industry rebounded, only to be battered by the predatory practices of the ridehail industry and more recently by the worldwide pandemic. The current attempt to restructure, what the Council calls an “essential service”, boils down to remaking taxicabs in the image of companies which have proven to flaunt employment laws to exploit workers, increase pollution and congestion and endanger passengers. The “open market” system envisioned by the Mayor’s office, LADOT and the Commission boils down to throwing taxi drivers into a marketplace distorted by venture capital and enabled by lack of political will and enforcement. The current proposal doubles down on the “hands-off” approached criticized by Blasi and Leavitt and throws cab drivers at the whim of more powerful corporate interests both within and without, while significantly increasing vehicle and technology compliance cost, quadrupling fleet to 8,500 vehicles or more and insurance 10X. Minor concessions, like “light color scheme”, designed more to attract ridehail drivers into a system (which they are statutorily prohibited from participating in by CPUC), then they will realistically affect the cost of operating a taxicab. They cannot compensate cabbies, forced to compete with subsidized prices, with wages diluted by thousands of additional vehicles and with precarity of ever-changing regulations. LADOT’s abrogation of their responsibilities to the workers is callous and is akin to Uber and Lyfts business practices. It is certainly not an example of a good public policy or responsible governance.

Objections relative to “Hearing” TWALA Objections, likely a violation of the Brown Act

It is a commonly accepted principal that a “*legislative body shall proceed to hear and pass upon all written and oral objections*”. Unfortunately, despite our requests that the Commission “conduct a comprehensive hearing on each and every procedural and substantive issue” and requesting to be given time to present our Objections at the December 3rd meeting of the Board, the President of the Commission, Mr. Spiegelman chose to ignore our pleas. Soliciting from Commission members whether they have “questions or comments” or providing for public comments, as required by the Brown Act, does not, by any stretch of imagination, constitute “hearing any and all objections,” as required by Los Angeles Administrative Code section

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22.488(g)(2)B. Any party filing Objections must be give adequate time to present them. We expect to be afforded an opportunity to have sufficient time to present our objections and to be able to address any questions or comments from the Commissioners. We have previously objected to several violations of the Brown act and have not seen the Commission or the City Attorney Office address this matter. Failure to address this issue must be addressed and cured and cannot be simply ignored or dismissed. Please see attached our **Cure and Correct demand** letter for violation of the Los Angeles Administrative code and the California Brown Act and TWALA's earlier **Objections to the manner in which the date for hearing our Objections was set. (Attachment A and B).**

TWALA wholly and enthusiastically supports Commissioner B. Gorbis Objections and expect this unprecedented action will be fully and formally addressed by the Board and the Office of the City Attorney.

We expect that the Secretary shall **place all objections** on the Taxicab Commission's **agenda** for its **next meeting**, so that the Commission shall **hear any and all objections** and that all relevant laws, regulations and procedures will be strictly adhered to, so as to ensure a fair and equitable hearing of all Objections.

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CC: President Spiegelman (ericspiegelman@gmail.com)
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Michael D. Nagle (michael.nagle@lacity.org)
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Attachment A Cure and Correct Demand for violation of LA Administrative Code and Brown Act

November 23, 2021

Via Electronic Mail

Jasmin San Luis (jasmin.sanluis@lacity.org)
Executive Administrative Assistant
Board of Taxicab Commissioners
Department of Transportation
100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Re: Demand for Cure and Correction letter for violations of Brown Act and Los Angeles Administrative Code

Dear Mr. Spiegelman and Mr. Nagle,

This letter is to call your attention to what we believe was a substantial violation of an essential provisions of the Ralph M. Brown Act (Government Code) and the Los Angeles Administrative code (Administrative Code), one which may jeopardize the finality of the action taken on November 10, 2021 by the Board of Taxicab Commissioners (Board, Commission, Taxicab Commission) and the Los Angeles Department of Transportation For Hire Vehicle Division.

The nature of the violations is as follows: In its meeting November 10, 2021, the Taxicab Commission voted to set the date to hear Objections to Tentative Taxicab Rules and Regulations pursuant to Los Angeles Administrative code section 22.488 (g)(2)B:

*“The Secretary shall place all objections on the Taxicab Commission’s agenda for its **next regular meeting** after the expiration of the time for filing the objections, and the **Commission shall then fix a date**, not less than five days later, for hearing any and all Objections..”.*

The action taken was not in compliance with the Brown Act because, the vote to set the date to hear the Objections is only permitted to be taken on the **next regular meeting**, as **regular meetings** are defined under the Brown act section 54954(a):

*“Each legislative body of a local agency, except for advisory committees or standing committees, shall provide, **by ordinance, resolution, bylaws**, or by whatever other rule is required for the conduct of business by that body, **the time and place for holding regular meetings**.”*

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The Board may set one or more **regular** meetings per month, provided that a 72-hour notice is provided (section 54954(a)(1):

“At least 72 hours before a regular meeting, the legislative body of the local agency, or its designee, shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting...”

or **special meetings**, with a 24-hour notice, section 54964(a)

A special meeting may be called at any time by the presiding officer of the legislative body of a local agency, or by a majority of the members of the legislative body, by delivering written notice to each member of the legislative body and to each local newspaper of general circulation and radio or television station requesting notice in writing and posting a notice on the local agency’s Internet Web site, if the local agency has one. The notice shall be delivered personally or by any other means and shall be received at least 24 hours before the time of the meeting as specified in the notice.

In other words, the in order for the Board to set the date for the hearing of the timely filed Objections, several conditions must be met. The meeting for setting the date for hearing Objections must be a **regular meeting**, which is set by **formal action**, such as **ordinance or board order** (as provided by Administrative Code section 22.488(f)(8):

“The powers conferred upon the Taxicab Commission shall be exercised by order or resolution adopted by a majority of its members and recorded in the minutes with the “Ayes” and “Noes” at length...”

and Government code section 54954(a):

“Each legislative body of a local agency, except for advisory committees or standing committees, shall provide, by ordinance, resolution, bylaws, or by whatever other rule is required for the conduct of business by that body, the time and place for holding regular meetings.”

Furthermore, the Board meeting for setting the date for hearing the Objections must be the **next regular meeting**, after the timely Objections have been filed.

Because the Commission meeting on November 10, 2021 was not set by formal action, 72-hour notice is insufficient to be considered a **regular meeting**. Such a notice may be adequate for any **special** meeting to hear most matters within the Board’s purview, but not for setting the date to hear Objections, as provided for by Administrative Code and California Government Code. Likewise, an informal agreement on September 17, 2020 to meet twice a month, lacks the formal action or notice required by Brown Act to be adequate to set a **regular** meeting. Moreover, legislative body may not undertake any action or discussion, on any item **not appearing on the agenda** (Government Code section 54954.3(a), as was the case for the aforementioned informal agreement on September 17, 2020.

Additionally, Deputy City Attorney Mr. Nagle’s contention during the Board’s meeting on November 10, 2021, in response to our objections of improper scheduling of setting of the date to hear Objections, filed on November 9, 2021, that section 22.488(f)(2) of Administrative Code provides appropriate grounds to move forward with scheduling the hearing of the Objections, is

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misconstruing either the content of our letter or applicable statutes. Section 22.488(f)(2) of the Administrative Code

“The Taxicab Commission shall hold a regular meeting at least once a month...”.

simply sets the **minimum** requirements for the **number of meetings** to be held by the Taxicab Commission. It does not address either the definition or criteria for setting a **regular meeting** of a legislative body.

As you are aware, the Los Angeles Administrative Code sets out the requirements and procedures for setting the date for hearing Objections and the Brown Act creates specific obligations for setting a regular meeting of a legislative body and also creates a legal remedy for illegally taken actions—namely, the judicial invalidation of them upon proper findings of fact and conclusions of law. Pursuant to the provisions of Government Code Section 54954(a) and Los Angeles Administrative Code 22.488(g)(2)B we demand that the Board of Taxicab Commissioners cure and correct the illegally taken action. Because the Administrative Code states that “the Secretary of the Taxicab Commission shall publish **once** in the official newspaper a certified copy of every proposed regulation tentatively approved by the Commission” and the **Commission shall then fix the date at next regular meeting**, which would have been November 18, 2021, the Board must vote de novo on the proposed Tentative Taxicab Rules and Regulations. After the vote, publication and timely Objections are filed, the Secretary must **place such Objections on the agenda for its next regular meeting**, and the “Commission shall then [be able to] set the date for hearing any and all objections”.

Thank you for your consideration,
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Phone: (323) 821-7660

CC: [Via Electronic Mail](#)
Board of Taxicab Commissioners
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President Board of Taxicab Commissioners
Commissioner Kennedy (Info@JLELawOffice.com)
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Attachment B ***TWALA Objections to setting of the date for hearing objections***

November 09, 2021

Via Electronic Mail (michael.nagle@lacity.org)

Michael D. Nagle
Deputy City Attorney
Office of the City Attorney
200 N Main St Fl 7, CHE
Los Angeles, CA 90012

Re: Objections to the scheduling of the setting of the date for the hearing of Objections to
Tentative Taxicab Rules and Regulations

Dear Mr. Nagle,

As you are aware, the President of the Board of Taxicab Commissioners (Board, Taxicab Commission, Commission), Mr. Spiegelman, has scheduled a “Regular meeting” for November 10, 2021 and has placed the scheduling of the hearing of the Objection to the Tentative Taxicab Rules and Regulations, as Items #10.

We hereby, once again, vehemently object to the President of the Commission exceeding his statutory authority by arbitrarily and capriciously violating proscribed procedures and existing regulations governing the scheduling of the hearing of Objections to the proposed regulations.

The Commission (i.e., the quorum of majority of the five Commissioners at a public meeting), following a timely filing of the Objections, must **fix a date** to hear Objection at the **next regular meeting**, which is normally the third Thursday of each month. Instead, President Spiegelman has inexplicably scheduled the setting of the date for hearing of the Objections on the second Wednesday, November 10th, and designated this meeting as “**regular**”. Unfortunately, an informal agreement among the Commissioners on September 17, 2020, more than a year ago, and only used on four occasions since, to schedule “**special**” meetings, can hardly be considered as sufficient justification under any logical or legal theory.

As you know, especially since this topic has been broached on numerous occasions at the end of 2020, that the operative regulations governing the setting of the date for hearing the objections are Los Angeles Administrative Code, the California Government Code and established precedent.

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Los Angeles Administrative Code section 22.488(g)(2)B provides that:

“Establish and prescribe by resolution regulations providing for the operation of, the extent, character and quality of service, the rates to be charged by and the extensions to be required of, any of those taxicab utilities, all in a manner not in conflict with any paramount regulation, rate fixing or extension requirements for any of those utilities by the State or nation.”

and

“The Secretary shall place all objections on the Taxicab Commission’s agenda for its next regular meeting after the expiration of the time for filing the objections, and the Commission shall then fix a date, not less than five days later, for hearing any and all Objections..”

Likewise, section 22.488 (f)(8) provides that:

The powers conferred upon the Taxicab Commission shall be exercised by order or resolution adopted by a majority of its members and recorded in the minutes with the “Ayes” and “Noes” at length

Additionally, California Government Code (Brown Act) section 54952.6 defines “action taken” as:

*“As used in this chapter, “action taken” means a **collective decision made by a majority of the members of a legislative body**, a collective commitment or promise by a majority of the members of a legislative body to make a positive or a negative decision, or an actual vote by a majority of the members of a legislative body when sitting as a body or entity, upon a motion, proposal, resolution, order or ordinance.”*

And section 54952.2(a) defines a “meeting” as follows:

“As used in this chapter, “meeting” means any congregation of a majority of the members of a legislative body at the same time and location, including teleconference location as permitted by Section 54953, to hear, discuss, deliberate, or take action on any item that is within the subject matter jurisdiction of the legislative body.”

Furthermore, section 54954(a) provides:

“Each legislative body of a local agency, except for advisory committees or standing committees, shall provide by ordinance, resolution, bylaws, or by whatever other rule is required for the conduct of business by that body, the time and place for holding regular meetings.”

Currently, regular Commission meetings occur on the third Thursday of each month, as specified in Administrative Code 22.448(f)(2). To set additional **regular meeting**, the Board must take **formal action**, to be agendised, discussed, voted on and occurring at designated intervals. Any regular Board meeting would also have to provide a notice of Cancellation, if majority of Commissioners are not available to attend.

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Since September 17, 2020, when attending Commissioners **informally** agreed to meet twice weekly, there were four **special** meetings scheduled on October 15, 2020, December 03, 2020, February 4, 2021 and more recently on August 26, 2021. There were also at least 6 **regular** meetings which were formally cancelled. Unfortunately, considering the troubled and flawed procedural history of the rulemaking process of drafting the taxicab permitting requirements, it is no more surprising that Mr. Spiegelman scheduled and then cancelled a “regular” Board meeting on November 4th, to set the date to hear the Objections that haven’t been filed yet, than the improper scheduling of a **regular** meeting on November 10th.

When, on October 21, 2021, at the regularly scheduled meeting, the Board approved and the Secretary published the Tentative Taxicab Rules and Regulations, by any measure, all the Commissioners and the public understood this as formal action, taken within the scope of the Commission’s authority as a legislative body. Therefore, all the rules listed above are applicable to the Board’s actions taken at the previous meeting and to the setting of the hearing of the Objections, which must be scheduled on November 18, 2021 and not at a **special** meeting, currently set for November 10th.

Kindly direct the President of the Board. Mr. Eric Spiegelman, to reschedule the setting of the date for hearing the Objections for a **regular** meeting of the Commission on November 18th, 2021.

Thank you for your consideration,

Leon Slomovic, President, Taxi Workers Association of Los Angeles

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CC: Via Electronic Mail

Jasmin San Luis (jasmin.sanluis@lacity.org)

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