

JUSTIFICATION/REASON FOR APPEAL

The Appellant files this appeal on the following grounds:

1. The City Zoning Administrator's imposition of the conditions of operation at the subject property motel, and the City's actions in bringing this action, violated the First Amendment Petition and Grievances Clause, the First Amendment Association Clause, the Second Amendment, the Fourth Amendment Search and Seizure Clause, the Fifth Amendment Takings Clause, the Fourteenth Amendment Due Process Clause and the Equal Protection Clause of the United States Constitution and parallel provisions of the California Constitution.
2. There is no credible evidence that the subject property motel has, or is operating in violation of any local, state, or federal law, or has operated as a public nuisance justifying the conditions by the City Zoning Administrator.
3. The City Zoning Administrator has pretextually imposed conditions of operation claiming to abate the alleged nuisance at the subject property motel, for the purposes of driving the Appellant out of business in order to close the motel and transfer the property to a third party developer or party.