

1 **CONSUMER WATCHDOG**
2 Jerry Flanagan (SBN: 271272)
3 jerry@consumerwatchdog.org
4 Benjamin Powell (SBN: 311624)
5 ben@consumerwatchdog.org
6 Ryan Mellino (SBN: 342497)
7 ryan@consumerwatchdog.org
8 6330 San Vicente Blvd., Suite 250
9 Los Angeles, CA 90048
10 Tel: (310) 392-0522
11 Fax: (310) 392-8874

9 **BLOOD HURST & O'REARDON, LLP**
10 Timothy G. Blood (SBN: 149343)
11 TBlood@bholaw.com
12 501 W. Broadway, Suite 1490
13 San Diego, CA 92101
14 Tel: (619) 338-1100
15 Fax: (619) 338-1101

14 **Attorneys for Applicants**

LAW OFFICES OF KELLY AVILES
Kelly Aviles (SBN 257168)
kaviles@opengovlaw.com
1502 Foothill Blvd., Suite 103-140
La Verne, CA 91750
Tel: (909) 991-7560
Fax: (909) 991-7594

LOS ANGELES TIMES COMMUNICATIONS LLC
Jeff Glasser (SBN 252596)
jeff.glasser@latimes.com
2300 E. Imperial Highway
El Segundo, CA 90245
Tel: 213-237-7077

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **LOS ANGELES DIVISION**

19 **IN RE APPLICATION OF**
20 **CONSUMER WATCHDOG AND**
21 **LOS ANGELES TIMES**
22 **COMMUNICATIONS LLC TO**
23 **UNSEAL COURT RECORDS**

Misc. Case No. 2:24-mc-28
Related to Case Nos. 2:21-cr-540-SB,
2:22-cr-00009-SB, 2:21-CR-00559-PA,
2:21-CR-00572-FMO

NOTICE OF RELATED CASES

24
25
26
27
28

1 Pursuant to Local Rule 83-1.3.1, subdivisions (a) and (c), Applicants
2 Consumer Watchdog and Los Angeles Times Communications LLC provide notice
3 that the Application to Unseal Court Records is related to the following, now closed,
4 criminal cases for which sentencing was presided over by Judge Stanley Blumenfeld
5 Jr. of the United States District Court, Central District of California, Los Angeles
6 Division:

- 7 • *United States v. Paul O. Paradis*, No. 2:21-cr-00540-SB.
- 8 • *United States v. Thomas H. Peters*, No. 2:22-cr-00009-SB.
- 9 • *United States v. David H. Wright*, No. 2:21-CR-00559-PA.
- 10 • *United States v. David F. Alexander*, No. 2:21-CR-00572-FMO.

11 The Application to Unseal requests that, pursuant to Local Rule 79-7.2, the
12 Court unseal 33 search warrants and related documents (“warrant materials”)
13 executed by the Federal Bureau of Investigation in connection with the United States
14 Attorney’s Office’s (“USAO”) now closed investigation into a collusive litigation
15 scheme, extortion, and subsequent cover-up involving the Los Angeles City
16 Attorney’s Office and the Los Angeles Department of Water and Power. All four of
17 the prior related cases before Judge Blumenfeld involved individuals who were
18 prosecuted for their involvement in illegal activity uncovered during the USAO’s
19 investigation.

20 All 33 search warrants and related documents at issue were filed as sentencing
21 discovery with Judge Blumenfeld on June 13 and June 20, 2023 in one of the cases
22 listed above—*United States v. Paradis*, 2:21-cr-00540-SB. The USAO stated that
23 around 1,390 of the 1,451 total pages in the sentencing discovery consisted of the
24 warrant materials at issue here, or approximately 96%.¹ According to the USAO, the

25 ¹ Government’s Motion to Intervene for the Limited Purpose of Opposing
26 Plaintiff’s Motion to Compel Confidential Criminal Sentencing Discovery and to
27 Quash Plaintiff’s Subpoena to Defendant Paul Paradis at 5, n.2, *Bradshaw v. City*
28 *of Los Angeles*, No. 2:19-cv-06661-GW(MARx), Aug. 22, 2023, ECF No. 290
 (“Motion to Quash”). The remaining discovery included 58 pages of FBI reports,
 and three pages listing recordings made by Paradis, which are not being sought

1 warrant materials “chronicle the government’s extensive, years-long investigation
2 into potential and actual criminal conduct stemming from the collusive litigation
3 scheme and related matters,” and show “the identities of the attorneys and City
4 officials under investigation . . . and evidence regarding their alleged conduct”
5 Motion to Quash at 5:5–10. As evident from the sentencing hearing in *United*
6 *States v. Paradis*, 2:21-cr-00540-SB, Judge Blumenfeld has a high degree of
7 familiarity with the warrant materials.²

8 The central legal question in front of the Court regarding the Application to
9 Unseal is whether any “compelling reasons . . . outweigh the general history of
10 access and the public policies favoring disclosure” of the warrant materials. *United*
11 *States v. Bus. of Custer Battlefield Museum & Store*, 658 F.3d 1188, 1192, 1194–95
12 (9th Cir. 2011). To make this evaluation, the Court must have a strong understanding
13 of the facts of, and individuals involved in, the underlying collusive litigation
14 scheme, extortion, and subsequent cover-up, as well as the government’s multi-year
15 investigation and prosecution. *See id.* at 1191–93 (The public’s interest in disclosure
16 must be balanced against the privacy interests, if any, of the public officials involved
17 in the unethical and illegal conduct). Moreover, as explained in detail in the
18 Application to Unseal, many factual issues raised in the hearing transcripts, briefing,
19 and sentencing memorandum of the four prior cases heard by Judge Blumenfeld are
20 highly relevant to evaluate the public’s right to access the warrant materials.
21 Therefore, the factual considerations regarding the Application to Unseal arise from
22 the same federal investigation into the four prior actions presided over by Judge
23 Blumenfeld, and it would entail a substantial duplication of labor for this matter to
24 be heard by different judges. C.D. Cal. Local Rules, Rule 83-1.3.1 (a), (c).

25
26
27 _____
here. *Id.*

28 ² *See, e.g.*, Transcript of Sentencing Hearing at 27:9–10, 12–14, *United States v.*
Paradis, No. 2:21-cr-00540-SB, Nov. 7, 2023, ECF No. 108.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: February 21, 2024

Respectfully submitted,

CONSUMER WATCHDOG

/s/ Jerry Flanagan
Jerry Flanagan (SBN: 271272)
jerry@consumerwatchdog.org
Benjamin Powell (SBN: 311624)
ben@consumerwatchdog.org
Ryan Mellino (SBN: 342497)
ryan@consumerwatchdog.org
6330 San Vicente Blvd., Suite 250
Los Angeles, CA 90048
Tel: (310) 392-0522
Fax: (310) 392-8874

BLOOD HURST & O'REARDON, LLP

/s/ Timothy G. Blood
Timothy G. Blood (SBN: 149343)
TBlood@bholaw.com
501 W. Broadway, Suite 1490
San Diego, CA 92101
Tel: (619) 338-1100
Fax: (619) 338-1101

LAW OFFICES OF KELLY AVILES

/s/ Kelly Aviles
Kelly Aviles (SBN: 257168)
kaviles@opengovlaw.com
1502 Foothill Blvd., Suite 103-140
La Verne, CA 91750
Tel: (909) 991-7560
Fax: (909) 991-7594

**LOS ANGELES TIMES
COMMUNICATIONS LLC**

/s/ Jeff Glasser
Jeff Glasser (SBN: 252596)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

jeff.glasser@latimes.com
2300 E. Imperial Highway
El Segundo, CA 90245
Tel: 213-237-7077

Attorneys for Applicants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 22, 2024.

/s/ Jerry Flanagan
Jerry Flanagan (SBN: 271272)
jerry@consumerwatchdog.org
Benjamin Powell (SBN: 311624)
ben@consumerwatchdog.org
Ryan Mellino (SBN: 342497)
ryan@consumerwatchdog.org
CONSUMER WATCHDOG
6330 San Vicente Blvd., Suite 250
Los Angeles, CA 90048
Tel: (310) 392-0522
Fax: (310) 392-8874