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7 Attorneys for Appellants KIMBERLY Y PEREZ and ROBERT FREEZE

8 In Re:

9 BIRF07-00739,
10 BIRF07-00740
11 as to 1970 Taylor Road,
12 Bethel Island, notice dated
13 April 6, 2023

14 April 16, 2023
15 APPEAL OF NOTICE OF PUBLIC
16 NUISANCE FOR SITE:
17 1970 Taylor Road, Bethel Island, Notice
18 under Contra Costa County Ordinance
19 section 14-6.410, *et seq.*
20 Appeal Submitted to the Clerk of the Board
21 of Supervisors, pursuant to Contra Costa
22 County Ordinance
23 14-6.416 - Appeal procedure

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**1. APPELLANTS RESPECTFULLY REQUEST NOTICE OF HEARING
AT THE ABOVE ADDRESS AND EMAIL.**

APPELLANTS KIMBERLY Y PEREZ and ROBERT FREEZE hereby appeal
the public nuisance notice dated April 6, 2023, BIRF07-00739 and BIRF07-
00740 and seek a hearing from the Board of Supervisors.

2. The location where the Appellants reside is 1970 Taylor Road, Bethel Island,
Contra Costa County, California, known as the "New Anchor Marina" and they
are residential tenants in possession of that location, and as such, have standing
to bring this appeal, as "other persons in possession of the property."

- 1 3. Appellants have resided at the New Anchor Marina for many years, and wish to
2 present evidence to the Board that the conditions at the property do not
3 constitute a nuisance.
- 4 4. The then-owners of the subject premises obtained “Emergency Rental Assistance”
5 from the State of California for some of these tenants, including appellants, in
6 2022, rental assistance funds that were paid to protect the tenancies of
7 residential tenants, through the auspices of the California Department of
8 Housing and Community Development.
- 9
10 5. Appellants also bring this appeal on equitable grounds, as the remedy that is needed
11 in part, is the restoration of electricity services at the subject premises, which
12 were terminated at the initiative and direction of the County of Contra Costa on
13 or about January 22, 2022.
- 14
15 6. Appropriate measures have not been undertaken to investigate or ensure
16 compliance with the Americans with Disabilities Act and other statutes, as
17 many of the residential tenants who reside at the New Anchor Marina are
18 permanently disabled, including the appellants.
- 19
20 7. Appellants in making this appeal rely on the provisions made in Contra Costa
21 County Ordinance 14-6.416, which provides in relevant part that one “may
22 appeal from this order of abatement, but any such appeal must be brought prior
23 to the expiration of the number of days specified above for completion of
24 abatement. The appeal must be in writing; specify the reasons for the appeal;
25 contain your name, address and telephone number...and be submitted to the
26 Clerk of the Board of Supervisors ...
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DATED: 4/17/2023

BAY AREA LEGAL AID

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Monique Doryland
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By: Monique Doryland, Esq.
Attorneys for Defendant