

CAPRI MADDOX, Esq
GENERAL MANAGER

CLAUDIA LUNA
ASSISTANT GENERAL MANAGER

**CITY OF LOS ANGELES
CALIFORNIA**



**KAREN BASS
MAYOR**

**CIVIL + HUMAN RIGHTS
AND EQUITY DEPARTMENT**

201 N. LOS ANGELES ST., SUITE 6
LOS ANGELES, CA 90012

(213) 978-1845

civilandhumanrights.lacity.org

NOTICE OF VIOLATION

Date: 10/1/2025

Compliance Date: 10/30/2025

INVESTIGATION NO.: DISINV0001142

NOTICE NO.: DISENF0001013

RESPONDENT: [REDACTED]

Through their agents of service:

[REDACTED]

Through their attorneys (as requested):

[REDACTED]

[REDACTED]

VIOLATION DATE: November 25, 2024

Violation. The Los Angeles Department of Civil + Human Rights and Equity (LA Civil Rights) conducted an investigation based on an allegation of discrimination by Respondent and found the following act(s) in violation of Los Angeles Municipal Code Section 51.03:

NOTICE OF VIOLATION

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1. On or about November 25, 2024, Complainant [REDACTED] a disabled female adult who uses a wheelchair for mobility attempted to shop at the two [REDACTED] store locations near her residence: [REDACTED] (collectively referred to as "the subject locations").
2. During her visits, the Complainant alleges that the subject locations were excessively overcrowded and obstructed due to an excess supply of merchandise racks and displays. Consequently, the Complainant reported that navigating the store in a wheelchair was virtually impossible, or words to that effect.
3. The Complainant further alleges that she raised multiple concerns directly with both store managers at the subject locations on several occasions. During these interactions, the Complainant reported the physical layout of the stores failed to meet Americans with Disabilities Act (ADA) and Centers for Disease Control and Prevention (CDC) accessibility requirements, including but not limited to: obstructed aisles and corners, insufficient clearances, and improper arrangement of shelving and merchandise display arrangements.
4. Despite raising these issues with management at both locations before and after the filing of this complaint, the Complainant states that no corrective actions were taken, and the stores' conditions remained unchanged.

By the foregoing actions, [REDACTED] engaged in discrimination based on disability in the violation of Los Angeles Municipal Code section 51.03. The Complainant was subjected to discriminatory treatment on the basis of their disability as a wheelchair user who was denied Americans with Disabilities Act (ADA) and Centers for Disease Control and Prevention (CDC) accessibility guidelines, including but not limited to adequate clearances in aisles and properly arranged shelving and merchandise display arrangements. Moreover, we found similar violations at multiple [REDACTED] locations, which further indicates the prevalence of these violations. This failure to provide accessible conditions created an unsafe and unwelcoming environment, ultimately interfering with the Complainant's ability, and those with ADA related needs, to access and enjoy the goods and services offered at [REDACTED] locations on equal terms.

VIOLATION #1: [REDACTED]

Administrative Penalties. Pursuant to Los Angeles Municipal Code Section 51.07(A) an administrative penalty of \$62,000 is imposed. You are ordered to pay the administrative penalty on or before the Compliance Date.

Compensatory Penalties. Pursuant to Los Angeles Municipal Code Section 51.07(A) a compensatory penalty of \$62,000 is imposed. You are ordered to pay the compensatory penalty on or before the Compliance Date.

Total Penalties Imposed: \$124,000
Due by 10/30/2025

VIOLATION #2: [REDACTED]

Administrative Penalties. Pursuant to Los Angeles Municipal Code Section 51.07(A) an administrative penalty of \$62,000 is imposed. You are ordered to pay the administrative penalty on or before the Compliance Date.

Compensatory Penalties. Pursuant to Los Angeles Municipal Code Section 51.07(A) a compensatory penalty of \$62,000 is imposed. You are ordered to pay the compensatory penalty on or before the Compliance Date.

Total Penalties Imposed: \$124,000
Due by 10/30/2025

Total Penalties Imposed for Violation #1 and Violation #2: \$248,000
Due by 10/30/2025

Corrective Actions. Pursuant to Los Angeles Municipal Code Section 51.07(A), the following corrective actions are imposed.

- You are ordered to provide formal business accessibility training from a third-party training provider for all [REDACTED] employees employed at the two above-listed locations. Training shall include instruction on disability awareness, business accessibility, and maintaining accessible features. Written confirmation from the training provider that the training has been completed shall be turned over to LA Civil Rights no later than **90 calendar days** from the date of the Notice of Violation.

- You are ordered to have all [REDACTED] stores located in the City of Los Angeles inspected by a Certified Access Specialist through the Division of State Architect's CASp Program at: [Division of State Architect's CASp Program](#). The CASp Specialist shall provide a letter confirming no findings with respect to all circulation paths and accessible routes from site arrival points to and throughout each facility. This letter shall be turned over to LA Civil Rights no later than **120 calendar days** from the date of the Notice of Violation.

ADMINISTRATIVE HEARING NOTICE:

You may file an appeal of this Notice of Violation by requesting an administrative hearing pursuant to Los Angeles Municipal Code Section 51.08(A). Your request for an administrative hearing/appeal must be postmarked or received by the Los Angeles Commission on Civil Rights within 15 calendar days of the mailing of this Notice. The request for hearing must: 1) be in writing; 2) specify in detail the objections to the notice of violation; and 3) indicate your preferred return mailing address. In order to request a hearing, please complete and return the attached Request for Hearing either by mail to the Commission on Civil Rights, 201 N. Los Angeles Street, Suite 6, Los Angeles, CA 90012, Mail Stop: 1500-010 or by email to CRE@lacity.org.

If the Commission on Civil Rights does not receive a timely request for a hearing or you fail to appear at the hearing that will be scheduled, the Notice of Violation will be considered final. Please refer to Los Angeles Municipal Code Section 51.08 and Commission on Civil Rights Administrative Rules and Procedures (<https://civilandhumanrights.lacity.org/commissions/commission-civil-rights>) for more information regarding the appeal process.

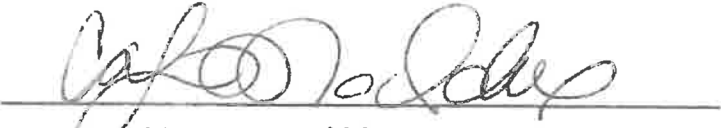
WARNING

Failure to respond to this notice will result in the Notice of Violation becoming final.

Failure to timely pay a penalty will result in the assessment of a late fee, assessed daily at a rate of 7 percent per annum of the outstanding amount of the penalty and late fees, if any. The City may collect any unpaid penalty, including the late fee, by means of a civil action, injunctive relief, specific performance, and the recordation of a lien against real property in accordance with applicable law.

Any questions regarding this Notice of Violation can be directed to Civil + Human Rights and Equity Department, 250 1st Street, 10th Floor, Los Angeles, CA 90012, (213) 978-1845, or CRE@lacity.org.

Signed:

A handwritten signature in black ink, appearing to read "Capri Maddox", is written over a horizontal line.

Capri Maddox, General Manager
Civil + Human Rights and Equity Department

10/11/25

Date