



March 6, 2019

Michael Feuer  
City Attorney of Los Angeles  
111 N. Hope Street, #340  
Los Angeles, CA 90012

Dear Mr. Feuer,

Like so many people in Judge Elihu Berle's court room Monday, I was sickened and appalled to learn of the conspiracy to defraud DWP ratepayers, the city and the court by attorneys in your employ and your top deputy.

Unrefuted testimony and evidence show that special counsels for the City Attorney, Paul Paradis and Paul Kiesel, secretly represented both the City, defending the cases by ratepayers over DWP billing errors, and the putative lead plaintiff in the case, Antwon Jones.

The two colluded with Ohio attorney Jack Landskroner, who invoked his Fifth Amendment right against self-incrimination, in refusing to answer Judge Berle's questions about paying referral fees to the City Attorney's special counsel.

Moreover, we learned that your top deputy Jim Clark and other members of the City Attorney's office were aware that Kiesel and Paradis represented both the plaintiff and the City as defendant in the Jones case because they saw the documents that proved it. Mr. Clark quarterbacked both cases for you. None of the City Attorneys ever disclosed this nefarious relationship to the Judge, the public, Mr. Jones, or anyone else in the case.

We also learned that Mr. Clark admitted under oath to destroying four to five pages of his hand written notes immediately before his recent deposition.

We know as well that you were told of some of these serious ethical irregularities in June 2015 with Mr. Clark present. We assume you investigated these allegations and Mr. Clark reassured you that nothing was amiss – a reassurance we now know is false.

This is public corruption of the worst kind. It involved a cover-up. It also comes at a huge cost to ratepayers and the City.

We learned this week as well about additional self-dealing by City Attorney's special counsel Paul Paradis, after being paid millions by the City to defend the ratepayer case and while secretly representing the lead plaintiff too. Paradis also controlled the company that secured a \$30 million no-bid contract from DWP to offer consulting services under the

settlement of the ratepayer case related to improvements in customer service (\$36 million was ultimately paid out under the contract).

Paradis's company, Aventador Utilities, apparently named after a \$400,000 type of Lamborghini, received the no-bid contract under the false pretense that the judge required immediate approval of a consultant because a settlement was imminent so the required bidding process had to be waived. The \$30 million no-bid contract was approved in June 2016, even though Aventador Utilities didn't exist as a corporate entity until March of 2017. The settlement was not approved until July 2017.

Your office permitted Paradis and Kiesel also to receive a nearly 20% contingency fee in the City's case against software consultant Price Waterhouse Coopers over the billing software. Your second highest ranking deputy Tom Peters, who defied a court order and refused to answer deposition questions about the special counsel's conflicts, is Mr. Kiesel's former law partner and has been active in these cases since early 2015.

We have been very vocal with you and the City about the conflicts in this case, the problems at DWP that go well beyond computer software, and the improprieties with this settlement.

Your office has participated in and enabled a massive fraud on the public, the ratepayers and the justice system. In two days we have heard no response to this public corruption from you.

You must fire Mr. Paradis and Mr. Kiesel. Mr. Clark and Mr. Peters should also be terminated for their ethical breaches and participation. You should immediately recuse yourself and your office from these matters. A full investigation of the matter should be sought from the California Attorney General's Office by you as your office is unable to independently investigate itself.

DWP billing errors have been a perennial problem for Angelenos, with outrageous examples, like a family being overcharged \$50,000 for a leaky toilet. DWP and the City tried to blame the software system, but we have long known the problem was also with DWP bureaucracy and systems.

Consumer Watchdog complained at the time that ratepayers filed a class action against the City and DWP over misbilling, the City Attorney's office seemed to pick a "ringer" from the attorneys suing to settle with. Mr. Landskroner came from Ohio, filed the complaint one day and literally offered the settlement the next, and didn't really represent the class.

This week's evidence shows we were absolutely right. The City's attorneys were double agents. They recruited Landskroner, drafted his complaint and controlled both sides of the case. That allowed the City and DWP to settle the ratepayer case inappropriately, without embarrassment or discovery, then turn around and sue a company that installed the software billing system for tens of millions of dollars instead.

Your attorneys have disgraced your office by deceiving the court and the public. Your office rigged the case to DWP's advantage and private attorneys working for it profited by tens of millions of dollars in public funds.

DWP ratepayers deserve far better than a City Attorney who allows DWP to rig a case in its favor and against the interests of ratepayers. You should fully disclose what you knew and when, then turn the matter over to the Attorney General's office for an independent investigation. If you don't address this matter promptly, publicly and decisively, you should resign as City Attorney.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Court". The signature is written in a cursive, somewhat stylized font.

Jamie Court  
President