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## Via Electronic Mail

February 25, 2026

Bel Air-Beverly Crest Neighborhood Council  
1645 Corinth Avenue, Room 103-4  
Los Angeles, CA 90025  
council@babnc.org

Catherine Palmer  
Board Administrator  
1645 Corinth Avenue, Room 103-4  
Los Angeles, CA 90025  
council@babnc.org

**Re: Supplemental Letter in Opposition to Proposed Variance for Outdoor Bar (Case No. ZA-2024-1881-ZV)**

Dear Honorable Board Members:

As you are aware, this firm represents Valentina and Alex Palermo (the “Palermos”) in connection with Mulholland Tennis Club’s (the “Club”) improper and unsubstantiated request for a zone variance to authorize a permanent dedicated outdoor bar (Case No. ZA-2024-1881-ZV) (the “Project”). On February 10, 2026, the City of Los Angeles (the “City”) Zoning Administrator held a public hearing on the Club’s variance application and expressly left the administrative record open to provide the Bel Air-Beverly Crest Neighborhood Council (“Neighborhood Council”) with an opportunity to opine on the Project.

The Bel Air-Beverly Crest Neighborhood Council Planning & Land Use Committee (“PLU Committee”) considered the matter later that same date and recommended approval based on an understanding, stemming directly from a series of unfounded comments from Club representatives, that there is no change of use, that a “service station” is already present, and that there will be no increase in membership. We previously submitted a detailed letter to the Zoning Administrator and the PLU Committee, dated February 6, 2026 (attached here as Exhibit A). We submit this supplemental focused letter to assist the Neighborhood Council in evaluating **two dispositive land-use defects** associated with the variance request—(1) the absence of any legally cognizable or articulated “unnecessary hardship,” and (2) the use of a variance as an improper substitute for the appropriate entitlement path—together with a short list of material ways the Club’s record presentation obscured and downplayed the nature of its request.

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**REQUEST:** The Palermos respectfully request that the Neighborhood Council votes to **recommend denial** of the requested variance and transmits its recommendation to the Zoning Administrator for inclusion in the administrative record.

**I. Dispositive legal defect: the applicant has not demonstrated any “unnecessary hardship”**

A variance is not a discretionary policy preference tool; it is an extraordinary remedy available only where strict application of the zoning rules creates a property-based hardship that rises to “unnecessary hardship.” From a legal standpoint, the variance should be denied because the Club’s proposed findings are woefully inadequate both legally and factually to justify its approval. Most importantly, the Club has not shown “unnecessary hardship” which is the required threshold per controlling caselaw; a mere showing of “practical difficulties” is insufficient. (City Charter § 562; LAMC Ch. A1, Div. 13.B.5; *Walnut Acres Neighborhood Assn. v. City of Los Angeles* (2015) 235 Cal.App.4th 1303, 1305 [“Although the test includes both ‘practical difficulties’ and ‘unnecessary hardships,’ the focus should be on ‘unnecessary hardships’ and not ‘practical difficulties,’ which is a lesser standard.”]; *Stolman v. City of Los Angeles* (2003) 114 Cal.App.4th 916, 925.)

The Club’s proposed hardship finding (quoted verbatim below) is telling: it relies on generalized crime reporting district statistics and the asserted “hardship” of being unable to prepare alcoholic beverages at a new outdoor bar location on a terrace where alcohol consumption is already permitted. The finding does not in good faith provide a sufficient basis for a variance and instead illustrates a complete misunderstanding by the Club’s representatives of entitlement requirements in the City. The Club’s proposed finding states:

*The Tennis club currently has a license to serve a full line of alcoholic beverages. The applicant is requesting to add a new service location for liquor at the terrace, where alcohol is already allowed to be consumed. Statistics from the Police Department reveal that in the subject Crime Reporting District No. 809, which has jurisdiction over the subject property, the average crime is far below the average crime rate throughout Los Angeles. The area is not considered high crime and it would be an unnecessary hardship to not be able to access alcoholic beverages on the Terrace at the proposed outdoor bar of a private club that has an active liquor license that allows for alcohol consumption throughout its premises.*

A decision on the variance cannot be based on the Club’s after-the-fact attempts to characterize the proposed outdoor bar in a different light or obfuscate the necessary findings for a variance. In considering this application the Neighborhood Council must focus on the legal

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sufficiency of the above-written findings that were prepared and submitted by the Club's representatives in support of its application. The purported findings fail to articulate any basis to satisfy the hardship standard:

- **“Convenience for staff”** (shortening service routes) is NOT a zoning hardship. It is an operational preference.
- **COVID-era conditions** are citywide and not a property-specific constraint inherent to the parcel.
- **Crime statistics** do NOT establish that the site cannot be reasonably used under existing rules; they are not evidence of hardship caused by strict application of the zoning ordinance.
- The record (including the Club representatives' own testimony) reflects that members can already obtain beverages and consume them on the terrace; the proposal is an **intensification of outdoor alcohol service**, not avoidance of hardship.

## II. **Dispositive legal defect: a variance is the wrong entitlement vehicle for the request**

Furthermore, the variance should be denied because it is the incorrect means to the Club's desired end. When asked directly during the PLU Committee hearing why a variance was being sought, the Club representatives conveyed they did not know and could not identify whether it was the “alcohol-specific component” or “the project in totality” that requires deviation from the zoning. This is unsettling given the fact that variances are considered extreme remedies for property-based hardships and should not be granted to permit a “use... substantially inconsistent with” applicable land use regulations including the local general plan and zoning. (*See* City Charter § 562; LAMC Ch. A1, Div. 13.B.5.) The Club's inability to articulate or justify why, legally, this is an appropriate entitlement underscores the precariousness of the Club's strategy to seek an extraordinary hardship-based remedy to authorize (and normalize) an operational expansion in a highly sensitive, residential-adjacent setting.

The correct procedure to establish an outdoor bar would be a zone change requesting the City to change the permitted uses in the A-1 district. Or, in the alternative, the Club could have requested a modification of its operative conditional use permit, review of which would appropriately facilitate consideration of the Project in the context of the Club's operating conditions, which were imposed, in part, to protect the neighbors' quiet enjoyment given the Club's close proximity to residences. It is inexplicable from a practical or legal standpoint why the Club's representatives believe a variance may authorize a use in a zone that expressly prohibits that use rather than pursuing a zone change.

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**III. The Neighborhood Council should not rely on the PLU recommendation because the Club's PLU presentation materially obscured the nature of its request and the conditions currently governing Club operations**

Finally, the PLU Committee's recommendation to approve the variance should be tempered in light of the fact that the PLU Committee was repeatedly misled by the Club during the February 10<sup>th</sup> hearing, in ways that obscured the purpose of the variance and confused the PLU Committee about the conditions under which the Club is currently permitted to operate. For example:

- **Rebranding the “bar” as a “service station.”** The Club repeatedly described the proposed outdoor bar as a “service station” for items such as smoothies and coffee, even though the variance request and supporting application materials expressly seek authorization for an outdoor bar to serve alcoholic beverages. The Club essentially presented one version of the Project to the City in its application materials and a different, more family-friendly, version of the Project to the PLU Committee and the Zoning Administrator.
- **Misuse of the City's Al Fresco framework.** The Club suggested that the City's Al Fresco program supports outdoor “bar” areas. It does not. The City's outdoor dining standards regulate outdoor dining, and alcohol service requires seated patrons and table service; any bar counter in an outdoor dining area is permitted only if it is not used as a point of sale.
- **Unverified Fire Department “support” letter.** The Club referenced and relied on a document presented as a Los Angeles Fire Department support letter. At minimum, the Neighborhood Council should treat any such document as unverified unless and until its provenance is independently confirmed through the agency.
- **Minimization of neighborhood noise history.** The Club stated it was not aware of noise issues affecting adjacent homes, notwithstanding that the Palermos and other nearby residents have raised noise and event-related concerns over an extended period and have engaged the Club regarding those issues.
- **Mischaracterization of event limitations.** The Club represented that its event activity is effectively unrestricted, notwithstanding that its approvals authorize non-commercial events only on “rare occasions” with narrow limitations intended to protect nearby residences and ensure operations to remain compatible with the surrounding district.
- **Misstatements regarding operating hours.** The Club made statements about its permitted operating hours that were not presented with reference to the governing

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approvals and conditions. Because the variance request implicates operating characteristics—hours, outdoor congregation, and event frequency—precision on the Club’s actual operating envelope is essential for an informed recommendation.

#### IV. Conclusion/Recommendation

This Neighborhood Council has a longstanding track record of relying on the adopted Community Plan to prevent incompatible intensification near single-family homes. The Community Plan emphasizes protecting low-density residential characteristics, protecting predominantly single-family neighborhoods from adjacent uses, and preserving the open and natural character of single-family development—cautioning that changes toward more intensive land use should be fully justified in the public interest. A dedicated outdoor bar on a terrace in immediate proximity to residences is precisely the type of incremental intensification that conflicts with those policies.

In making a recommendation on the Project this evening, the Neighborhood Council should review the variance application materials and carefully consider the Club’s current operating conditions—including its obligation to operate “at all times with due regard for the character of the surrounding district,”—and the stated goals and policies in the adopted Community Plan. (See Case No. ZA 13805(PAD), January 29, 1993.) A permanent outdoor bar that would facilitate social events outdoors within close proximity to the surrounding homes directly contravenes the residential use of the surrounding neighborhood.

For the reasons above, the Palermos respectfully request that the Neighborhood Council votes to **recommend denial** of the requested variance and transmits its recommendation to the Zoning Administrator for inclusion in the administrative record. The Neighborhood Council’s recommendation is particularly important here because the Zoning Administrator left the record open specifically to receive it.

Very truly yours,



Alan D. Hearty

ADH

# **EXHIBIT A**

# Allen Matkins

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February 6, 2026

Jordann Turner  
City of Los Angeles  
Office of Zoning Administration  
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Los Angeles, California 90012

**Re: Opposition to Proposed Variance for Outdoor Bar (Case No. ZA-2024-1881-ZV)**

Mr. Turner,

We represent Valentina and Alex Palermo (the “**Palermos**”) in connection with their opposition to the Mulholland Tennis Club’s (the “**Club**”) proposed variance for an outdoor bar (Case No. ZA-2024-1881-ZV).

As detailed below, the Club, which is located at 2555 Crest View Drive (the “**Property**”) adjacent to the Palermos’ family home, has for several years operated in a manner that violates its entitlements and the underlying zoning, and caused significant noise and traffic impacts in the surrounding neighborhood. The Club now seeks approval from the City of Los Angeles (the “**City**”) Zoning Administrator (“**ZA**”) of a variance that would allow the Club to construct an outdoor bar (the “**Variance**”) that would only increase the ongoing nuisance conditions it causes.

As summarized below and supported by the attached exhibits (1) local regulations prohibit the issuance of a variance to authorize a use not permitted by the zoning; (2) even if a variance were appropriate, the City cannot make the necessary findings to support the Variance; (3) approval of the Variance rewards the Club notwithstanding persistent and egregious noncompliance with its entitlements; (4) the Club has not engaged in good faith with concerned neighbors; and (5) unusual circumstances apply to the Variance such that it is not eligible for a California Environmental Quality Act (“**CEQA**”) exemption.

Accordingly, on behalf of the Palermos and similarly situated concerned neighbors, we respectfully request that the ZA (1) denies the requested Variance for an outdoor bar (the “**Project**”); (2) declines to rely on any CEQA categorical exemption for the Project and instead requires appropriate environmental review; or, at minimum, (3) continues the hearing to allow proper noticing and the Bel Air–Beverly Crest Neighborhood Council sufficient time to complete its

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review and to require the applicant to submit a complete operational plan and impact information necessary to support the required variance findings.

This letter is submitted for inclusion in the administrative record and to preserve the Palermos' administrative remedies. The Palermos expressly reserve the right to present additional written materials and oral testimony at the public hearing, and to supplement these comments in response to information submitted by the applicant or the City's planning department after the date of this letter. The Palermos further reserve all rights and remedies available at law and in equity, including the right to pursue any and all administrative appeals and judicial relief as may be appropriate. The Palermos will not hesitate to take all actions necessary to protect their property rights and to ensure that any approval complies with the Los Angeles Municipal Code ("**LAMC**"), CEQA, and other applicable law.

## **I. Background.**

The Club is located on a hillside 5.4-acre parcel surrounded by single-family residences. The Property is zoned A1 (Agricultural), one of the City's most restrictive zones, and is governed by a low-intensity land use policy framework in the Bel Air–Beverly Crest Community Plan (the "**Community Plan**"), including specific policies intended to protect the open and natural character of the area and to protect predominantly single-family neighborhoods from adjacent intensity.

For most of the Club's history since its opening in 1966, the Club operated in the manner originally intended, as a private tennis club and social and recreational facility for use by its members and their guests. However, in recent years, the Club has shifted its purpose to an event facility and commercial enterprise, holding numerous daytime and late-night events seemingly to generate additional income. These events, which are often open to the general public, have dramatically increased noise and light pollution due to the events themselves and the clean-up required afterwards, vehicle and delivery vehicle trips to and from the Property, and traffic and parking impacts. These operations directly conflict with the residential character of the neighborhood the Club was originally established to serve.

The Club applied for the Variance in January 2024 to construct the Project on its southern-facing outdoor terrace with the intent of expanding its alcoholic beverage service beyond the existing restaurant. The terrace overlooks several private residences, more than ten of which are located within a five hundred foot radius. The Palermos, who live in one such residence, are extremely concerned that approval of the Variance would not only violate the law but would also dramatically increase disruptions to the quiet enjoyment of their property.

Due to admitted inadvertence by the assigned City planner (Exhibit A) the Club's variance application was scheduled for hearing in front of the ZA on February 10, 2026 at 9:00 AM notwithstanding that the Bel Air–Beverly Crest Neighborhood Council's (the "**Neighborhood Council**") Planning & Land Use Committee was scheduled to review the Variance during its

meeting at 7:00 PM the same evening. The ZA hearing was not subsequently rescheduled so the ZA must now proceed without the benefit of community input on record. Because this is a discretionary entitlement that has been established as controversial with clear neighborhood-facing operational impacts (noise, lighting, traffic, parking, and hours), if the ZA does not deny the Variance outright, the Palermos respectfully request a continuance so the Neighborhood Council's input can be included in the administrative record and so that the applicant can provide complete operational details necessary for the City to make (or decline to make) the required findings.

## **II. A Variance Cannot be Granted to Authorize a Use that is Inconsistent with Surrounding Uses.**

The Club states in the Variance application that it seeks relief from LAMC section 12.05A, which lists the permitted uses within the A1 (Agricultural) zoning district, “[t]o allow the renovation of an existing covered patio to become a 231 [square foot] outdoor bar in an RE15 and A1 zone.” Such a variance is prohibited by the City Charter and the LAMC which each independently proscribe the granting of a variance to allow a use that is “substantially inconsistent with the limitations upon other properties in the same zone and vicinity.” (*See* City Charter § 562; LAMC Ch. A1, Div. 13.B.5.)

An outdoor bar is not only substantially inconsistent with the uses permitted by the A1 zoning district; it is wholly inconsistent with those uses. The A1 district generally allows for low-density residential uses, agricultural uses, such as animal keeping, and a limited array of recreational uses, including golf courses and private clubs. (*See* LAMC §§ 12.05(A); 12.24.) Notably absent from this list are uses that impede the peaceful neighborhood character, such as an outdoor bar with amplified sound.

The Variance would not result in a minor physical adjustment. It is an intensification of outdoor alcohol service at a private club in immediate proximity to single-family residences. Even where private club facilities may be allowed on this site subject to discretionary approvals and operating limits, the zoning and entitlement framework does not contemplate expansion of outdoor alcohol service in a manner that increases late-hour outdoor congregation, noise, lighting, and traffic impacts on nearby noise-sensitive residential uses.

Furthermore, the City's guidance on variances states that a variance “should *not* be requested if another established procedure is designed to grant the use or privilege.” (Los Angeles City Planning Findings/Special Requirements for Variance, dated January 1, 2024; emphasis added.) Here, the correct procedure to authorize outdoor alcohol service would be for the applicant to seek a zoning amendment. Or, at the very least and given that the Club's restaurant and alcoholic beverage service is incidental to the Club's primary, conditionally-permitted tennis use, an alternative procedure for expansion of beverage service outdoors would be for the Club to seek modification of its operative Conditional Use Permit (“CUP”). That procedure would appropriately facilitate consideration of the Project in context of the Club's operating conditions which were

imposed, in part, to protect the neighbors' quiet enjoyment given the Club's close proximity to residences.

A zone variance is an extraordinary remedy intended to relieve a property-based hardship; it is not designed to function as an operational reprogramming tool. The core issues raised by the Project are operational—hours of outdoor alcohol service, event frequency, amplified sound controls, lighting, security, parking/valet circulation, and enforcement/monitoring. Those issues are evaluated and conditioned through the appropriate discretionary entitlement/plan approval framework governing the Club's operations, not through a variance that attempts to shoehorn an operational expansion into a hardship-based finding structure.

### **III. Even if a Variance is Appropriate, the City Cannot Make the Necessary Findings to Support It.**

The Club submitted proposed findings with its Variance application describing to the City the reasons it believes an outdoor bar should be permitted notwithstanding the restrictions in the zoning code. Assuming the City intends to rely on the Club's proposed reasoning, the findings are woefully inadequate both legally and factually to justify the granting of the Variance. The burden rests on the applicant to demonstrate, through competent evidence, that each required finding can be made. Conclusory assertions are not substantial evidence. If any one of the required findings cannot be made based on substantial evidence in the record, the Variance must be denied.

#### **A. *The Club has Not Demonstrated Unnecessary Hardship Because Disapproving the Variance Would Not Cause Dire Financial Circumstances.***

The LAMC requires that, in order to grant a variance, the ZA must find strict application of the zoning ordinance would result in "unnecessary hardship inconsistent with the general purposes and intent of the zoning regulations." (City Charter § 562; LAMC Ch. A1, Div. 13.B.5.)

Controlling caselaw sets a high threshold for demonstrating financial hardship – the applicant must show that "dire financial hardship" would result without the variance, not only that the applicant "merely wants the variance to increase existing profits." (*Stolman v. City of Los Angeles* (2003) 114 Cal.App.4th 916, 926.) For example, in *Walnut Acres Neighborhood Association v. City of Los Angeles*, the Court ruled there was not substantial evidence of unnecessary hardship where an eldercare facility would be limited to 16 rooms instead of 60 rooms because there was no evidence that the facility could not be profitable with only 16 rooms. (*Walnut Acres Neighborhood Ass'n v. City of Los Angeles* (2015) 235 Cal.App.4th 1303, 1315.)

The Club's first proposed finding asserts that it would be an "unnecessary hardship" for the Club "to not be able to access alcoholic beverages on the Terrace," and cites to its existing liquor license and local crime statistics. These facts do not approach the "dire financial hardship" standard required to justify the Variance. The Club's conclusory statement that, under its existing liquor license, beverages are permitted to be consumed outdoors is unsupported by evidence in the record.

To the contrary, there is a comment from a planning staff member on the Club's outdoor bar application elevations, dated July 23, 2023, stating the need for the Club to "obtain CUB approval." Furthermore, the application provides no financial data or other evidence showing that denial would deprive the Property of a reasonable use, threaten the Club's continued operation under its existing approvals, or otherwise create an extraordinary hardship attributable to the Property's physical conditions rather than to the applicant's preferred mode of operation. The crime-rate discussion is not relevant to the hardship inquiry and underscores the absence of evidence supporting this required finding. We note the Club is limited regarding its financial positioning because it is *supposed to* operate as a 501(c)(7) non-profit organization and should not be seeking profits as such.

***B. The Club's Topography Does Not Indicate Any Special Circumstance Necessitating a Variance.***

The LAMC also requires that there are "special circumstances" applicable to the subject property regarding its size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity. (City Charter § 562; LAMC Ch. A1, Div. 13.B.5; *see also Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1183.)

The Club relies on a purported "46 foot grade difference" and vertical separation as a "buffer." Even if true, that is not a special circumstance that necessitates a variance. A claimed buffer goes, at most, to the applicant's argument regarding potential impacts; it does not establish that strict application of the zoning ordinance creates a practical difficulty or hardship attributable to unique physical conditions of the Property. Moreover, hillside topography and elevation differentials are common conditions in this area and do not, standing alone, constitute the type of unique site constraint that can justify the Variance. The Club does not describe why this elevation creates a special circumstance vis-à-vis the surrounding property owners that should entitle it to establish an outdoor bar. To the contrary, the most elevated property in the vicinity should comply with the local zoning because, given its location, it has more visual impact and therefore plays a bigger role in establishing community character than other neighboring properties in the vicinity.

The Club also attempts to cast blame on neighboring property owners by stating that, because the neighbors bought houses near the Club, the Club is specially absolved from causing disturbances that affect the quiet enjoyment of their respective properties. While the Club does receive some special privileges under its conditional use permit as compared to the standard zoning for the area, the Club consistently subverts those conditions and causes nuisances as a result. Neighbors did not knowingly move near loud parties, congested streets, and lights shining into their homes outside of the Club's hours of operation and are entitled to rely on the operating envelope imposed by the Club's former approvals and the zoning limitations intended to protect noise-sensitive residential uses.

**C. *The Variance is Not Necessary for the Club to Preserve and Enjoy its Property Rights.***

The ZA must additionally find that granting a variance “is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone or vicinity.” (City Charter § 562; LAMC Ch. A1, Div. 13.B.5.) Controlling caselaw interprets the “same zone and vicinity” language to mean properties within “reasonably close proximity” of the subject, *not* any similar property elsewhere in the City. (*Stolman*, 114 Cal.App.4th at 929.)

The Club’s proposed finding attempts to argue that because two other country clubs in the City allow the sale and consumption of alcohol in close proximity to homes, the Club should be allowed to do the same at its proposed outdoor bar. Notwithstanding this argument being incomplete because the Club did not establish those country clubs allow the sale and consumption of alcohol *outside* near homes, it is also irrelevant. Per the *Stolman* case referenced above, a variance can only be granted if it is required to preserve a property right as compared to other properties in the neighborhood. Since at least the vast majority, if not all, of the properties in the neighborhood do not have the right to sell or serve alcohol outdoors, disallowing the Club from doing so would not inhibit its property rights. Furthermore, the Club’s references to gathering outside in light of Covid-19 are now moot.

The Club already enjoys substantial rights associated with its historically approved private club facilities, including indoor bar service. The Variance request seeks a new privilege—dedicated outdoor alcohol service—without any showing that similarly situated properties in the same zone and immediate vicinity enjoy that privilege. References to other clubs elsewhere in the City do not satisfy the “same zone and vicinity” standard and do not establish deprivation of a neighborhood-comparable property right.

**D. *The Outdoor Bar Would Have Significant Impacts on the Public Welfare Due to Noise and Traffic Impacts.***

The LAMC also requires the ZA to find that the variance would not impact the public welfare nor cause negative impacts to surrounding properties. (City Charter § 562; LAMC Ch. A1, Div. 13.B.5.)

Contrary to the Club’s blanket statement that there would be no disturbances caused by the outdoor bar, granting the Variance would have an unquestionably negative impact on the surrounding single-family residences, the closest of which is a mere 200 feet from the proposed bar. An outdoor bar would increase socializing and amplified sounds outdoors, exacerbating the Club’s already noisy operations even further (and potentially late into the night), and would interfere with neighbors’ rights to quiet enjoyment of their properties.

Outdoor alcohol service is qualitatively different from indoor service. It predictably increases the duration and intensity of outdoor congregation, elevates voice levels, and shifts

activity into exterior areas that directly affect nearby noise-sensitive residential uses. Based on the documented history of late-hour noise, event-related activity, and lighting impacts associated with the Club's operations (*see Section IV.B*), it is reasonably foreseeable that introducing a dedicated outdoor bar on the terrace would intensify those impacts.

Likewise, traffic impacts from increasing the commercial operations at the Club will directly impact surrounding residents. Access to the Club is from Crest View Drive, a narrow two-lane road in the hills already lacking the width and capacity to serve the large events the Club regularly hosts notwithstanding that such events are inconsistent with its entitlements (*see Section IV.A*). Indeed, given the Project's purpose—creating a dedicated outdoor service point on a terrace with expansive views—it is reasonably foreseeable that the Project will increase the attractiveness and intensity of outdoor gathering at the site, with corresponding increases in evening and weekend traffic and neighborhood parking pressure unless strictly limited by enforceable conditions.

Critically, the applicant has not provided a complete, enforceable operational plan for the proposed outdoor bar—hours of outdoor alcohol service, last call, clean-up timing, whether any outdoor amplified sound will occur, maximum occupancy of the terrace during bar service, frequency and size of events, lighting specifications including shielding/timers, and a parking/valet/circulation plan that prevents spillover onto residential streets. Without those operational commitments, the City cannot make the required “no material detriment” finding supported by substantial evidence.

***E. The Outdoor Bar is Inconsistent with the Land Use and Noise Elements of the General Plan.***

The final finding must establish that granting of the Variance will not adversely affect any element of the General Plan. (City Charter § 562; LAMC Ch. A1, Div. 13.B.5.)

The Club's proposed findings state that “[t]he request is in harmony and not in conflict in any way with the objectives of the General Plan” and that including an outdoor bar “will not be materially detrimental to the character of development in the immediate neighborhood, nor will it affect the environment” because the Club has an existing license for the sale of alcohol indoors. These conclusory statements fail to acknowledge the fundamental difference between operation of a bar indoors versus outdoors near single family dwellings.

Contrary to what the Club claims in its findings, the construction of an outdoor bar would have a deleterious impact on the community, thus conflicting with several objectives of the General Plan. First, the Noise Element of the General Plan labels single family dwellings as a noise sensitive use and explicitly states an objective of the General Plan is to “reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.” (General Plan, p. 3-1.) Allowing for an outdoor bar featuring both socializing and amplified music or other sounds just 200 feet from the nearest sensitive use would increase, rather than reduce, intrusive noise.

Furthermore, approval of the Variance would be in direct conflict with policies and goals identified in Community Plan. One of the Community Plan’s stated goals is to protect the “low-density residential characteristics” of the community. Furthermore, the Community Plan explicitly provides that “predominately single-family residential neighborhoods,” like the one surrounding the Club, “[should be] protected from adjacent uses,” and that the “open and natural character of single-family development of the [community] is desirable and deserving of public protection” such that any “[c]hanges in this area should be fully justified as being in the public interest” before the City “grants a . . . more intensive land use which would alter this character.” (Community Plan, pp. III-1, III-3.) Approval of the Variance would be antithetical to these goals. Allowing noisy, outdoor uses that drive additional traffic into a quiet residential neighborhood erodes, rather than protects, the low-density residential characteristics of the Community Plan area. An outdoor bar at a private club within just 200 feet of the nearest sensitive use is exactly the type of use the Community Plan seeks to prevent. This “more intensive land use” would fundamentally alter the character of the single-family residential neighborhood surrounding the Club.

The Project is precisely the type of incremental intensification—extended outdoor activity, evening use, and associated traffic/parking effects—that the Community Plan cautions against in hillside, predominantly single-family areas unless fully justified and conditioned to protect adjacent neighborhoods.

#### **IV. The Club Seeks to Expand its Alcohol Service Despite Egregious Noncompliance with Existing Conditions of Approval.**

Approval of the Variance will only empower the Club to continue defying the conditions of its CUP. Outlined below is an overview of the City-granted approvals, the conditions and requirements governing the Club’s operations, and the ongoing management-sanctioned noncompliance which will only worsen if the Variance is approved.

##### ***A. Existing Discretionary Approvals.***

On September 28, 1964, the City’s Board of Zoning Adjustment approved a CUP authorizing use and development of the Property with a “private tennis club and customary facilities, including a swimming pool, gymnasium, as well as kitchen, banquet, dining room and bar facilities.” (See Case No. ZAI 17087, BZA 1454, September 28, 1964 (the “**Original CUP**”).)

This Original CUP has been modified and interpreted by the City on several occasions since approval. First, in 1966, the City’s ZA approved a modification which, among other things, allowed for an expansion of the then-under-construction Club onto two adjacent parcels. (Case No. ZA 18305, August 22, 1966 (the “**1966 Modification**”).) Then, in 1973, in response to questions regarding the legality of special events, the ZA issued an interpretation stating that a “private tennis party for single members and invited guests” was consistent with the terms of the Original CUP. (See Letter of Clarification re: BZA Case No. 1454 and ZA Case No 17087, May 9, 1973 (the

“**1973 Interpretation**”).) Notably, the ZA explicitly stated that such events would be allowed only on “rare occasions,” that in no case are “commercial venture[s] . . . permitted,” and, as a result, that signage must be posted noting that “all proceeds are a donation, and any surplus will be given to a philanthropic organization.”

In 1984, the ZA authorized the addition of an office, approximately 247 square feet in area, to the Club for the use of a professional tennis player. (Letter re: Approval of Plan 2555 Crestview Drive, November 19, 1984 (the “**1984 Expansion**”).) And finally, in 1993, the ZA approved the enclosure of a section of the ground floor breezeway adjacent to the existing exercise area to allow for an expansion of the Club’s gym. (Case No. ZA 18305(PAD), January 29, 1993 (the “**1993 Expansion**”).) In connection with the 1993 Expansion, the City approved a new set of plans (the “**Approved Plans**”), which continue to govern the use and development of the site today. (*Ibid.*)

Collectively, the Original CUP, the 1966 Modification, the 1973 Interpretation, the 1984 Expansion, the 1993 Expansion, and the Approved Plans shall be referred to herein as the “**Discretionary Approvals.**” Copies of the Discretionary Approvals are attached hereto as Exhibit B. Use and development of the Property must be in substantial conformance with the Discretionary Approvals and their associated conditions of approval (“**COAs**”). Nevertheless, as outlined in detail below, there are numerous examples of the Club defying the Discretionary Approvals and COAs over the last decade.

***B. The Club Does Not Comply With its Conditions of Approval.***

The Club no longer attempts to conceal its illegal commercial operations and has, for the last several years, operated with brazen disregard for restrictions and conditions set forth in the Discretionary Approvals. The key legal requirements that govern the Property are listed below:

- *Original CUP (COA 3)*: There shall be no unusual lighting effect provided on the buildings or premises which could be disturbing to adjacent residents and all exterior lights shall be placed so as to be directed away from residential properties.
- *Original CUP (COA 4)*: Any guests permitted on the premises shall be accompanied by a member.
- *Original CUP (COA 7)*: The Club building facility may be used by philanthropic groups or local community service groups if such groups are sponsored by a regular member.
- *Original CUP (COA 8)*: All activities on the premises within the clubhouse building shall be limited to the hours between 8 a.m. and 2 a.m., with outside activities to be restricted from 8 a.m. to 10 p.m. except for necessary custodial service and a maintenance guard.

- *1973 Interpretation*: No “commercial venture[s]” are permitted at the Club. However, special activities for “members and invited guests” shall be allowed on “rare occasions” provided “it is posted that all proceeds [from such events] are a donation and any surplus will be given to a philanthropic organization.”
- *1984 Expansion (COA 2)*: The 1984 Approval authorized the addition of a second-floor office for a professional tennis player provided no retail sales be allowed within this office.
- *1993 Expansion (COA 3)*: “[T]he authorized use shall be conducted at all times ***with due regard for the character of the surrounding district***, and the right is reserved to the [ZA] to impose additional conditions if, in the [ZA’s] opinion, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of the adjacent property.” (emphasis added)

There are numerous instances of the Club’s noncompliance with these conditions, many of which have been documented by the Palermos over the past two years. Exhibit C describes the date and time of each documented instance where the Club defied one or more of the above-listed conditions. In short summary, the Club frequently hosts large events during the daytime and evening with colorful lights and amplified music. The Club’s parking lot cannot accommodate the number of guests that attend these events so it is often the case that parked vehicles spill out onto the streets of the surrounding neighborhoods, and nearby residents are subject to the sounds associated with large delivery trucks loading and unloading rental equipment when setting up and cleaning up events. Furthermore, the Club does not limit events to be tennis-related, permits members of the public to rent the premises and attend events without accompaniment by members, and does not require nor publicize that proceeds from events will be donated to charity. Any suggestion by the Club that the ongoing operations are not commercial in nature is false and can be easily refuted. Indeed, a report attached hereto as Exhibit D and prepared by a private investigator catalogs and erases any doubt as to the commercial activities carried out at the Property—the Club openly advertises itself and operates as an event facility. Finally, the Club often leaves its tennis court LED flood lights on during non-operating hours, sometimes for the entire night, and has converted the tennis player office to a pro-shop with ongoing retail sales (Exhibit C).

This documented pattern of noncompliance is directly relevant to the required variance findings—particularly the “no material detriment” and General Plan consistency findings. Where the operator has repeatedly failed to adhere to existing conditions specifically designed to protect nearby residents, **the City cannot reasonably conclude, on substantial evidence, that expanding outdoor alcohol service will not materially exacerbate impacts**. At minimum, the Project should be continued and processed through the appropriate operational review/plan approval framework with enforceable conditions, monitoring, and clear enforcement triggers.

Approval of the Variance would further enable and empower the Club to continue defying its COAs, which are specifically targeted at limiting the Club's operations so it does not create nuisance conditions that affect the surrounding neighborhood.

**V. The Club Subverts Good Faith Engagement with Concerned Neighbors.**

On January 27, 2026, the Neighborhood Council, through its Planning & Land Use Committee, submitted a written request to the City's planning department to continue the currently posted February 10, 2026 ZA hearing date and to hold this pending case open for sixty (60) days so that the Neighborhood Council can conduct its scheduled public hearings and provide a recommendation for inclusion in the City's record (Exhibit E). The Neighborhood Council letter confirms that (i) the Neighborhood Council Planning & Land Use Committee has scheduled its public hearing and review of the project for February 10, 2026, and (ii) the full Neighborhood Council Board will hear testimony and take a position on February 25, 2026. The Neighborhood Council further states it has been receiving significant input from the community over the past several months regarding this project and that continuing the City hearing until after the Neighborhood Council's hearings will provide a public forum for the applicant, community, and stakeholders to voice justifications and concerns regarding the request.

Proceeding with the City's discretionary hearing before the Neighborhood Council can complete its scheduled review would defeat the intended function of the Neighborhood Council process—namely, informed advisory input before discretionary decision-making. This concern is particularly acute here because this application has been pending for an extended period, and the applicant had ample opportunity to engage with the Neighborhood Council and nearby residents early in the process in a manner that could have meaningfully informed the project design and operational commitments before the matter was calendared for decision. To date, the administrative record does not reflect any sustained, good-faith engagement effort by the applicant with nearby residents or the Neighborhood Council designed to identify concerns and incorporate reasonable design or operational modifications before the City's discretionary hearing was scheduled.

For these reasons, and consistent with the Neighborhood Council's written request, the Palermos respectfully request that the ZA continue the hearing so that the Neighborhood Council may complete its Planning & Land Use Committee and full Board hearings and submit its recommendation for consideration as part of the City's administrative record.

**VI. The Outdoor Bar Requires Review Under the California Environmental Quality Act.**

The Project is a discretionary approval and therefore subject to CEQA. The applicant will likely request that the City rely on a categorical exemption. That approach is not supported on this record.

First, to the extent the City considers the Class 1 (Existing Facilities) exemption, that exemption applies only where there is negligible or no expansion of existing or former use. A

Jordann Turner  
February 6, 2026  
Page 12

dedicated outdoor bar/service feature on a terrace overlooking nearby residences is an operational intensification of outdoor activity and alcohol service, not merely a minor alteration with no change in use intensity.

Second, the “unusual circumstances” exception applies where there is a reasonable possibility that the Project will have a significant effect due to unusual circumstances. Here, the Project’s hillside/residential adjacency, the proximity of noise-sensitive single-family uses, and the documented history of existing event-related noise, lighting, and traffic/parking impacts associated with the Club’s operations (Exhibit C) establish, at minimum, a reasonable possibility of significant impacts from intensifying outdoor bar activity. (See Cal. Code Regs., tit. 14, section 15300.2(c).)

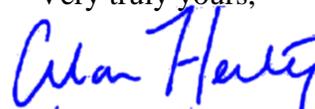
Accordingly, the City should not approve a categorical exemption on this record and should require appropriate environmental review sufficient to analyze and, where feasible, mitigate noise, lighting, traffic/parking, and related operational impacts. At a minimum, the matter should be continued until the applicant provides a complete operational plan (hours, outdoor service limits, amplified sound restrictions, occupancy, lighting specifications, and parking/valet circulation) necessary for a meaningful CEQA and variance findings analysis.

## **VII. Conclusion**

For the foregoing reasons, the Palermos respectfully request that the Zoning Administrator deny the requested zone variance. The applicant has not carried its burden to establish, based on substantial evidence, that each of the required findings can be made, and the current record does not support a determination that the Project would not be materially detrimental to nearby noise-sensitive residential uses or consistent with the applicable General Plan and Community Plan policies.

In the alternative, and consistent with the written continuance request submitted by the Neighborhood Council, the Palermos respectfully request that the Zoning Administrator continues the hearing so that (i) the Neighborhood Council may complete its scheduled public hearings and submit its recommendation for inclusion in the City’s administrative record, and (ii) the applicant may provide a complete operational plan and environmental analysis sufficient to allow the City to evaluate the request and make (or decline to make) the required findings on a fully developed record.

Very truly yours,



Alan D. Hearty

ADH

# **EXHIBIT A**

## Wright, Jordan

---

**From:** Andres Gutierrez <andres.gutierrez@lacity.org>  
**Sent:** Tuesday, January 20, 2026 9:25 AM  
**To:** Wright, Jordan  
**Cc:** McCarron, Eoin; Nichols, Matthew  
**Subject:** Re: Request for Meeting - Case No. ZA-2024-1881-ZV  
**Attachments:** February 10 (1) (1).pdf  
**Categories:** EXTERNAL EMAIL ALERT - EXTERNAL EMAIL ALERT

CAUTION: External Email

Hello,

I was unaware that the Neighborhood Council meeting was scheduled for the same day as the Zoning Administrator hearing until after scheduling. Please note that the Neighborhood Council meeting occurring afterward does not impact the Zoning Administrator's decision-making process.

The Zoning Administrator will wait to receive the Neighborhood Council's recommendation before a final determination is reached. The neighborhood council can also attend both hearings as well. However, the hearing remains the final step before the appeal period begins. I have attached the hearing notice agenda if you have not received it already.

Best regards,



**Andres Gutierrez, MPP he/him/his**  
Planning Assistant, OZA  
Los Angeles City Planning

LOS ANGELES  
CITY PLANNING

200 N. Spring St., Room 763  
Los Angeles, CA 90012  
T: (213) 682-6399 | [Planning4LA.org](http://Planning4LA.org)



*Please note that the [New Zoning Code](#) is now operative in the Downtown area. Applications in this area are now required to use the revised forms available on the Department's [Forms page](#).*

On Fri, Jan 16, 2026 at 4:33 PM Wright, Jordan <[jwright@allenmatkins.com](mailto:jwright@allenmatkins.com)> wrote:

Hi Andres,

I hope you are doing well, and happy new year.

As you know, we represent a concerned homeowner adjacent to the Mulholland Tennis Club and are aware of several others in the vicinity that take significant issue with the proposed outdoor bar area at

this location. I am emailing after observing on the City’s portal that the Mulholland Tennis Club Zoning Administrator hearing appears to be scheduled for February 10, 2026 at 9 AM.

Before the Zoning Administrator hearing, the critical next step in the entitlement process is for the Applicant to appear before the Neighborhood Council’s Planning and Land Use Committee (PLUC) on February 10, 2026 at 7 PM, where the PLUC would vote on a recommendation to the full Board, followed by consideration at the Neighborhood Council’s full Board meeting—anticipated in March—where the Neighborhood Council would take formal action to oppose or support the project.

I assume the Zoning Administrator hearing date may be a misunderstanding or mistake given the required prerequisite step for the Applicant to obtain input from the Neighborhood Council. Scheduling the first Neighborhood Council PLUC meeting on the matter after the Zoning Administrator hearing runs counter to this process and deprives the neighborhood of meaningful input.

By way of background, the Applicant was invited to both the December 2<sup>nd</sup> and January 13<sup>th</sup> Neighborhood Council PLUC meetings but opted for the later February 10<sup>th</sup> slot, which coincidentally occurs on the same day after the Zoning Administrator hearing is scheduled.

Can you please confirm the Zoning Administrator hearing will be postponed to a later date, following the Neighborhood Council Board’s formal vote to oppose or support the project?

Thank you very much.

Best,

Jordan

Jordan Wright | Associate

Allen Matkins Leck Gamble Mallory & Natsis LLP  
[jwright@allenmatkins.com](mailto:jwright@allenmatkins.com) | Direct (415) 273-7439 | Main (415) 837-1515

**Allen Matkins**

# **EXHIBIT B**

# **The Original CUP**

CITY OF LOS ANGELES  
CALIFORNIA

ROGER S. HUTCHINSON  
CHAIRMAN

~~PIETRO DI CARLO~~  
VICE-CHAIRMAN - Harold R. Gendel

~~JOHN L. REX~~  
MEMBER - The Rev. Frank Kelley

JAMES R. TWEEDY  
MEMBER

~~HAROLD R. GENDEL~~  
MEMBER - Gordon G. MacLean

RALPH O. ROMERO  
SECRETARY



SAMUEL WM. YORTY  
MAYOR

BOARD OF  
ZONING ADJUSTMENT  
ROOM 361 CITY HALL  
LOS ANGELES, CALIF. 90012  
MADISON 4-5211  
EXTENSION 3507

September 28, 1964

Paul H. Talbert  
9380 Santa Monica  
Beverly Hills, California

B. Z. A. Case No. 1454  
Z. A. Case No. 17087  
2500 Crest View Drive  
Beverly Crest District

Frank P. Lombardi  
Director of Planning

Huber E. Smutz  
Chief Zoning Administrator

Department of Building and Safety

Greetings:

The Board of Zoning Adjustment at its regular meeting of September 1, 1964 considered the request of Paul H. Talbert for a transfer of jurisdiction from the Office of Zoning Administration arising from failure to render a determination on the application, requesting a Conditional Use approval on a parcel of unsubdivided acreage containing approximately 5 acres bordered by record tracts and including future streets designated as Lots 84 and 85 of Tract No. 21176, all located in the R1-1-H Zone at 2500 Crest View Drive, Beverly Crest District, to permit the operation of a private tennis club, having four tennis courts, a swimming pool, children's play area, 81 parking spaces and one- and two-story clubhouse building containing gymnasium, steam and sauna rooms and a kitchen, banquet, dining room and bar facilities.

The Board conducted a public hearing on August 18, 1964 and continued the hearing to the above date and reviewed the information contained in the Zoning Administration file, the request for a transfer of jurisdiction on the above case and the report of the Associate Zoning Administrator in answer thereto.

After thorough consideration of the various aspects of this matter, the Board found that the prerequisites for the granting of a Conditional Use as set forth in Section 12.24-C of the Municipal Code are present in this case for the following reasons:

0680060077

1. The subject property is an irregularly shaped ownership containing approximately 5.15 acres located along a mountain ridge which abuts the rear of recorded subdivisions, except for a radio transmission tower adjoining on the northwest operating under authority of zone case No. 6509. It is proposed to develop this site for a privately operated tennis club incorporated by property owners in the area and providing appurtenant facilities, including a swimming pool, gymnasium and sauna rooms as well as kitchen, banquet, dining room and bar facilities. The site is separated from adjoining properties by the topography and is well suited for private recreational purposes which, under proper control, would be deemed to be in harmony with the general intent and purpose of the Master Plan as applied to this particular district.
2. Granting the request without conditions to control the type of construction and manner of development would not be in harmony with the various elements and objectives of the Comprehensive Zoning Plan or desirable to public convenience and welfare. However, under the conditions and limitations hereinafter set forth, granting the request will not have these objectionable features. Such approval will permit development of this substantial parcel of land that will not be materially detrimental to the character or development of the neighborhood and will provide a facility that will benefit the general community.

The Board of Zoning Adjustment, therefore, by virtue of the authority contained in Section 99 of the City Charter and Section 12.28 of the Municipal Code, considered the request, as amended at the public hearing, on the transfer of jurisdiction in Z. A. Case No. 17087 for a Conditional Use on that portion of Lot 3, Section 6, Township 1 south, Range 14 west, San Bernardino Meridian, in the City of Los Angeles, as more particularly described in Z. A. Case No. 17087, which by reference is made a part hereof and, when vacated, those future streets designated as Lots 84 and 85 of Tract No. 21176, all located in the R1-1-H Zone at 2500 Crest View Drive, Beverly Crest District, and the development and use of said described property for a private tennis club and customary facilities, including a swimming pool, gymnasium, as well as kitchen, banquet, dining room and bar facilities, is hereby authorized as a Conditional Use, subject to the following terms and conditions:

0680060078

1. That prior to the issuance of any building permits or starting of construction on the property, Crest View Drive (which is a future street comprising Lots 85 and 84 of Tract 21176, extending through the subject property north to Skyline Drive) shall be improved to conform to the improvements on Crest View Drive in Tract No. 20249; or the required improvements may be guaranteed by a bond which is satisfactory to the City Engineer.
2. That prior to the issuance of any building permits or starting of construction on the property, detailed plans including elevation drawings of all the buildings together with the detailed plot plan for developing the site showing precise location of all buildings, exterior property lines, enclosing fixtures, driveways, parking areas, landscaping, recreational features, etc., shall be submitted to and approved by the Board of Zoning Adjustment. The development as proposed on the herein referred to final site plan shall not run significantly counter to the development as shown on the plot plan attached to the file and marked Exhibit M.
3. There shall be no unusual lighting effect provided on the buildings or premises which could be disturbing to adjacent residents and all exterior lights shall be placed so as to be directed away from residential properties.
4. The identification sign located at the intersection of the access driveway and Crest View Drive shall not exceed 20 sq. ft. and shall be conservative in nature and may be lighted only by flood lights.
5. A parking area shall be provided for at least 81 cars and shall be enclosed by a 3 ft. in height wall as shown on Exhibit M. A loading and unloading area must be provided adjacent to the parking lot also as shown on Exhibit M. The lighting for the parking area shall be conservative and the light from all electroliers shall be deflected away from adjacent residences.
6. Not more than 400 regular family memberships and not more than 50 Jr. memberships are to be issued. (A Jr. membership is to be issued only to sons and daughters or regular members while they are between the ages of 23 and 30). Any guests permitted on the premises shall be accompanied by a member. The Board of Directors of

06800600079

*Copy retained*

the Club shall have the right to issue a limited number of Honorary and Clerical memberships on an annual basis. There shall be 25 memberships reserved for a period of 24 months for the future residents of Tract No. 21176; such memberships shall be subject to all of the qualifications and fee requirements as provided in the Club bylaws.

7. The Club building facility may be used by philanthropic groups or local community service groups if such groups are sponsored by a regular member.
8. That all activities on the premises within the clubhouse building shall be limited to the hours between 8 a.m. and 2 a.m., with outside activities to be restricted from 8 a.m. to 10 p.m. except for necessary custodial service and a maintenance guard.
9. That an agreement concerning all the information contained in the last paragraph of Page 2 be recorded by the property owners in the County Recorder's Office; said agreement to run with the land and be binding on any subsequent owners, heirs or assigns. Furthermore, that said agreement be first submitted to the Secretary of the Board of Zoning Adjustment for approval before being recorded, and after recordation, a copy thereof with the Recorder's number and date be furnished the Board of Zoning Adjustment for attachment to the file before required permits are issued.
10. That this authorization shall be conditional upon the privileges thereof utilized within one year after the date of this communication; and that if they are not utilized or construction work is not begun within such time and carried on diligently to completion of at least one usable unit, the authorization shall become void and be deemed to have lapsed, unless the Board of Zoning Adjustment shall have granted an extension of such time limit after sufficient evidence has been submitted that there has been an unavoidable delay in taking advantage of the privileges; and further, that once any portion of the privileges are utilized, the conditions hereof shall become immediately operative and must be strictly complied with. Further, that this Conditional Use approval shall be subject to revocation in the same manner as provided under Section 12.27-B,7 of the Municipal Code for revocation of zone variances, if the conditions hereof are not strictly complied with.

0680060080

September 28, 1964

- 5 -

Attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency; that if any condition of the grant is violated or not complied with in every respect, then the applicant or his successor in interest may be prosecuted for violating these conditions the same for any violation of the requirements contained in the Municipal Code; and that if the property is sold, leased, or rented to or occupied by any person or corporation other than the applicant, it is incumbent on him to give notice of the conditions of this grant.

Very truly yours,

*Ralph O. Romero*  
Ralph O. Romero  
Secretary

ROR:er

cc: Board Members  
Branch Office - W.L.A.

0680060081

## **The 1966 Expansion**

CITY OF LOS ANGELES  
CALIFORNIA

*attach  
30 17087*

DEPARTMENT OF  
CITY PLANNING

OFFICE OF  
ZONING ADMINISTRATION

600 CITY HALL  
LOS ANGELES, CALIF. 90012  
MADISON 4-5211

HUBER E. SMUTZ  
CHIEF ZONING ADMINISTRATOR  
  
ASSOCIATE ZONING ADMINISTRATORS  
CHARLES V. CADWALLADER  
ARTHUR DVORIN  
MANUS D. O'GRADY  
R. A. RUDSER



SAM YORTY  
MAYOR

August 22, 1966

The Mulholland Club  
ATTN.: William J. McClellan  
8735 Hollywood Hills Road  
Los Angeles, California 90046

Re: Z. A. CASE NO. 18305  
B.Z.A. CASE NO. 1454  
2555 Crest View Drive  
Beverly Crest District  
D. M. No. 7024

Audrey Fuss  
9091 Wonderland Park Avenue  
Hollywood, California

Department of Building and Safety

Greetings:

In the matter of the amended application of The Mulholland Club and Audrey Fuss for Conditional Use Approval on a site in the RE15-1-H Zone, please be advised that based upon the Findings of Facts hereinafter set forth and by virtue of authority contained in Section 98 of the City Charter and Section 12.24-C of the Municipal Code, the Associate Zoning Administrator, to whom the matter was assigned, hereby authorizes as a Conditional Use as far as the zoning regulations are concerned, the development and use of a portion of Lot C, Parcel Map LA No. 241 (formerly portions of Lots 25 and 26), Tract No. 15007, located at 2555 Crest View Drive, Beverly Crest District, for the establishment, operation and maintenance of tennis courts, landscaping and appurtenant facilities, including enclosing fixtures as an expansion to the existing tennis club under construction on the ownership as authorized by the Board of Zoning Adjustment under B.Z.A. Case No. 1454 on September 28, 1964, and the modification of Condition No. 6 of the Board of Zoning Adjustment authorization relative to the definition of "Junior Memberships", upon the following terms and conditions:

1. That the property shall be developed substantially in accordance with the plot plan attached to the file and marked Exhibit "A" which has been approved by the Board of Zoning Adjustment.
2. Condition No. 6 of B.Z.A. Case No. 1454 is hereby modified but only as to change the definition of

0680060083

"Junior Membership" included within the parenthesis as follows: (a Junior Membership is to be issued only to ~~sens and daughters~~ or single persons of regular members while they are between the ages of 23 and 30).

3. That all other conditions and terms of B.Z.A. Case No. 1454 except as herein specifically modified, shall be fully complied with as if restated herein.

06800600084  
The applicants' attention is called to the fact that this grant is not a permit or license, and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, that if any condition of this grant is violated, or if the same be not complied with in every respect, then the applicants or their successors in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. The Associate Zoning Administrator's determination in this matter will become effective after an elapsed period of ten (10) days from the date of this communication, unless an appeal therefrom is filed with the Board of Zoning Adjustment.

#### FINDINGS OF FACTS

After thorough consideration of the statements, facts and reports contained in the application, the report of the Planning Associate thereon, the statements made at the public hearing before the Associate Zoning Administrator on August 19, 1966, and the proceedings in connection with Z. A. Case No. 17087 and B.Z.A. Case No. 1454 which resulted in the establishment of the tennis club presently under construction, all of which are by reference made a part hereof, as well as personal inspection of the property and surrounding district, I find that the requirements for authorizing a Conditional Use under the provisions of Section 12.24-C of the Municipal Code have been established by the following facts:

1. Essentially, the involved property and addition constitutes an interior parcel of land approximately 57 ft. wide and 220 ft. in length. The property was formerly a portion of two record lots. The northeasterly rear portions of the lots had a sharp uphill grade and the rear lot lines had an elevation from 30 to 40 ft. above the dwellings. In the grading of the tennis club site, it was found that these portions of the two lots were more oriented to the club activities and were acquired for the herein

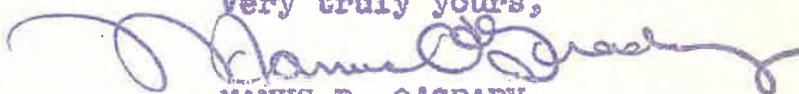
authorized purposes. Parcel Map LA No. 241 permitting the severances of the properties was approved and subsequently recorded on July 29, 1966. Inasmuch as the involved property is not oriented to any adjoining residential use and is now a part of the tennis club ownership, it is determined that the location is proper for expanded tennis club activities in relation to adjacent uses and developments in the community and to the various elements and objectives of the Master Plan and such development will not be materially detrimental to the character of the developments in the immediate neighborhood.

2. Relative to the requested amendment to the file, the applicant advises that Condition No. 6 of B.Z.A. Case No. 1454 relative to the requirement that a Junior Membership is to be issued only to sons and daughters of regular members while they are between the ages of 23 and 30, creates the following problems:

Membership (or stock ownership) can only be in the name of one person, and consequently in cases where people have remarried, children in the family or stepchildren, rather than "sons or daughters" as set forth in this condition regarding Junior Memberships. Childless members have objected to the restrictiveness of this condition in that it obviates the eligibility of godsons and/or goddaughters, nieces or nephews, etc., which they feel should have the same eligibility as sons or daughters as a result of their close relationship to these younger persons. Inasmuch as this condition was suggested by the Club to the Board of Zoning Adjustment, and further, inasmuch as the intent of this condition was to provide a younger group of persons within the membership complex, it appears that insufficient consideration was given to this condition before it was suggested.

This amendment is reasonable and will have no appreciable affect on the operation of the tennis club relative to required membership and will be in keeping with the overall purpose and intent of the Board's authorization.

Very truly yours,



MANUS D. O'GRADY

Associate Zoning Administrator

MDO'G:jt

cc: Director of Planning  
cc: Los Angeles County Assessor  
cc: Stephen W. Cunningham & Assoc. Inc.  
3723 Wilshire Boulevard  
Los Angeles, California 90005

06800600085

## **The 1973 Interpretation**

CITY OF LOS ANGELES  
CALIFORNIA

AD



SAM YORTY  
MAYOR

BOARD OF  
ZONING APPEALS  
ROOM 561, CITY HALL  
LOS ANGELES 90012  
485-3505

FR. FRANK KELLEY  
CHAIRMAN  
CLARK DRANE  
VICE-CHAIRMAN  
M. JACK WOODS  
MEMBER  
DONALD P. HAGGERTY  
MEMBER  
GEORGE W. BECKLEY  
MEMBER  
GILBERT R. CALDWELL  
SECRETARY

May 9, 1973

Board of Directors  
Mulholland Club  
2500 Crest View Drive  
Los Angeles, California 90046

Re: LETTER OF CLARIFICATION  
B. Z. A. Case No. 1454  
Z. A. Case No. 17087  
2500 Crest View Drive  
Beverly Crest District

Calvin S. Hamilton  
Director of Planning

Arthur Dvorin  
Chief Zoning Administrator

Department of Building and Safety

Greetings:

The Board of Zoning Appeals on May 8, 1973, considered a letter from the applicant's representative, Engineering Technology, Inc., dated May 8, 1973, requesting clarification of Conditions Nos. 6 and 7 of a prior Board determination dated September 23, 1964, in granting a conditional use for a private tennis club and customary facilities for 450 family memberships.

After considering the matter of holding a proposed tennis party for single members and non-members of the club, including testimony from the applicant's representative, it was determined that no modifications or changes be made in the grant; however, the conditions do not restrict such special activities on rare occasions providing it is posted that all proceeds are a donation and any surplus will be given to a philanthropic organization.

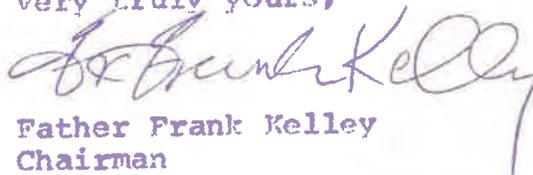
The Board reiterated that no commercial venture was permitted and did not approve any deviation from the original grant as a private tennis club and limited to family memberships; however, guests are allowed, as stated in Condition No. 6 and such private tennis party for single members and invited guests would not be contrary to the original grant.

06800600075

May 9, 1973

However, such special activity should not become common place, and the Board reserves the right to impose additional restrictions or conditions if the private tennis club should become detrimental to the public welfare or injurious to the vicinity in which it is located.

Very truly yours,



Father Frank Kelley  
Chairman



William E. Lillenberg  
Secretary

FK:WEL:rc

0680060076

## **The 1984 Expansion**

ZA 18305 (C)

# CITY OF LOS ANGELES

CALIFORNIA



TOM BRADLEY  
MAYOR

DEPARTMENT OF  
CITY PLANNING  
CALVIN S. HAMILTON  
DIRECTOR  
KEI UYEDA  
DEPUTY DIRECTOR

OFFICE OF  
ZONING ADMINISTRATION

Room 600, City Hall  
Los Angeles, CA 90012  
485-3831

FRANKLIN P. EBERHARD  
CHIEF ZONING ADMINISTRATOR  
ASSOCIATE ZONING ADMINISTRATORS  
CHARLES V. CADWALLADER  
JAMES J. CRISP  
WILLIE H. GERARD  
ROBERT JANOVICI  
WILLIAM LILLENBERG  
LOUIS J. MUTO  
JACK C. SEDWICK

November 19, 1984

DM 7024

The Mulholland Club  
2555 Crestview Drive  
Los Angeles, CA 90046

Re: CASE NO. ZA 18305  
CONDITIONAL USE  
APPROVAL OF PLANS  
2555 Crestview Drive  
Bel Air-Beverly Crest  
Planning Area  
D. M. 7024  
C. D. No. 2

Department of Building and Safety

2316000800332

A plan has been submitted to the Office of Zoning Administration for review and approval under Section 12.24G of the Municipal Code in order to permit the addition of an approximate 14- by 20-foot tennis office, for a professional tennis player, to the second floor of the existing club house. Said addition will contain approximately 247 square feet, therefore, no additional parking space is required.

A review of the file disclosed that a conditional use application (ZA 18305) for the development of a private tennis club over the site was under consideration by the Associate Zoning Administrator. The Associate Zoning Administrator in his investigation found that the applicant requested a transfer of jurisdiction to the Board of Zoning Appeals. The BZA granted approval of the conditional use under Case No. BZA 1454, dated September 28, 1964.

Expansion of the site to include the development and use of a portion of Parcel C, Parcel Map No. 241 (formerly portions of Lots 25 and 26), Tract No. 15007, was granted August 22, 1966 under Section 12.24-C.

The instant request and plan bearing our receiving date of August 31, 1984 appear consistent with the basic development concept initially approved in 1984, and the previous plan approval action of August 22, 1966. Therefore, the request and plan are hereby approved as submitted. Under the foregoing circumstances, I find that the request and plan can be approved and do hereby approve the floor plan bearing our receiving date of September 6, 1984, subject to the following conditions:

1. That the addition be an office for a professional tennis player.
2. That retail sales be prohibited from this building addition.

The applicant is advised that this action relates to zoning only. Any necessary permits or certificates of occupancy must be obtained from the appropriate City department and the applicant must comply with all other public regulations. It should also be noted that a 15-day appeal period from the date of this communication is mandatory before this approval becomes effective.

*Franklin P. Eberhard*  
FRANKLIN P. EBERHARD  
Chief Zoning Administrator

FPE:EH:yc

cc: Director of Planning  
County Assessor  
Councilman Joel Wachs  
Second District

2 3 6 0 0 0 0 0 3 3 1 3

## **The 1993 Expansion**

CITY OF LOS ANGELES  
CALIFORNIA

ROBERT JANOVICI  
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

JAMES J. CRISP  
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HORACE E. TRAMEL, JR.



TOM BRADLEY  
MAYOR

DEPARTMENT OF  
CITY PLANNING  
CON HOWE  
DIRECTOR

FRANKLIN P. EBERHARD  
DEPUTY DIRECTOR

OFFICE OF  
ZONING ADMINISTRATION

ROOM 600, CITY HALL  
LOS ANGELES, CA 90012-4801  
(213) 485-3851

January 29, 1993

The Mulholland Tennis Club (A)  
2555 Crestview Drive  
Los Angeles, CA 90046

Gary Shapiro (R)  
2555 Crestview Drive  
Los Angeles, CA 90046

Department of Building and Safety

Re: CASE NO. ZA 18305(PAD)  
CONDITIONAL USE STATUS AND  
APPROVAL OF PLANS  
2555 Crestview Drive  
Bel Air-Beverly Crest  
Planning Area  
Zone : A-1-H/RE15-1-H  
D. M.: 7024  
C. D.: 5  
CEQA : CE 92-1303  
Fish & Game: Exempt  
Legal Description: Parcels C and  
D, a division of Lots 25 and  
26, Tract No. 15007

Approved (as further conditioned herein) is the above-noted request seeking:

a Zoning Administrator's determination, pursuant to the provisions of Sections 12.24-F and 12.24-G of the Municipal Code, for approval of plans to enclose a section of the ground floor breezeway of approximately 10 feet by 34 feet adjacent to and opening into the existing exercise area to allow additional room for exercise at the Mulholland Tennis Club,

upon the following additional terms and conditions:

1. That the use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A".
2. That all other use, height and area regulations of the Municipal Code be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
3. That the authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective conditions, if, in the Administrator's opinion, such conditions are proven necessary



2310090005

for the protection of persons in the neighborhood or occupants of adjacent property.

4. That a copy of this grant and its conditions and/or any subsequent appeal of this grant and its resultant conditions and/or letters of clarification, shall be included in the "notes" portion of the building plans submitted to the Department of Building and Safety for purposes of having a building permit issued.
5. That nothing in this grant relieves the subject property from providing parking in accordance with the requirements of the Los Angeles Municipal Code.

#### TIME LIMIT - LAPSE OF PRIVILEGES

The use hereby authorized is conditional upon the privileges' being utilized (i.e., the use approved being lawfully conducted on the site) within 180 days after the effective date hereof, and if they are not utilized or construction work (i.e., actual substantial physical improvements installed) is not begun within said time and carried on diligently to completion this authorization shall become void and any privilege or use granted hereby shall be deemed to have lapsed unless a Zoning Administrator has granted an extension of the time limit (the request for the extension having been submitted prior to the expiration of the grant and accompanied by the appropriate fee), after sufficient evidence has been submitted indicating that there was unavoidable delay in taking advantage of the grant. Once any portion of the privilege hereby granted is utilized, the other conditions thereof become immediately operative and must be strictly observed. Furthermore, this authorization shall be subject to revocation in the manner as provided under Section 12.24,1 of the Municipal Code if the conditions imposed are not strictly observed.

#### APPEAL PERIOD - EFFECTIVE DATE

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or if the same be not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. The Zoning Administrator's determination in this matter will become effective after February 16, 1993, unless an appeal therefrom is filed with the Board of Zoning Appeals. Any appeal must be filed on the prescribed forms, accompanied by the required fee and received and receipted at a Public Office of the Department of City Planning on or before the above date or the appeal will not be accepted. Such offices are located at:

Los Angeles City Hall  
200 North Spring Street  
Room 460, Counter S  
Los Angeles, CA 90012  
(213) 485-7826

6251 Van Nuys Boulevard  
First Floor  
Van Nuys, CA 91401  
(818) 989-8596

2310090006

THE APPLICANT IS FURTHER ADVISED THAT ALL SUBSEQUENT CONTACT WITH THE ZONING ADMINISTRATOR REGARDING THIS DETERMINATION, INCLUDING CLARIFICATION, SIGN-OFFS OF CONDITIONS AND PLANS OR FOR BUILDING PERMIT APPLICATIONS, ETC., SHALL BE ACCOMPLISHED BY APPOINTMENT ONLY.

#### FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the report of the Zoning Analyst thereon, all of which are by reference made a part hereof, as well as knowledge of the property and the surrounding district, I find as follows:

1. The subject property is an interior, irregularly-shaped hillside parcel containing approximately 5.4 acres. The site is approximately one mile south of Mulholland Drive and lies almost half way between Coldwater Canyon Drive and Laurel Canyon Boulevard.

Surrounding properties are within A1-1 and RE15-1 Zones and are characterized by hillside topography and narrow streets. The surrounding properties are developed with well-maintained single-family dwellings

Crestview Drive, adjoining the subject property to the east, is a designated local street dedicated a width of 36 feet and with some curb and gutter.

Previous cases, affidavits, permits, etc.

#### Subject Property:

Case No. ZAI 17087 - On September 28, 1964, the Zoning Administrator asked for clarification of a conditional use to permit the operation of Mulholland Tennis Club.

Case No. BZA 1454 authorized the expansion of a private tennis club when transfer of jurisdiction to BZA occurred.

Case No. ZA 18305 On August 22, 1966 action amended the application.

Case No. ZA 18305 On November 19, 1984 action permitted the addition of a professional tennis pro's office.

2. The Mulholland Tennis Club is located at 2555 Crestview Drive. The Club has expanded over the years and includes tennis courts, saunas, gym/exercise rooms, pool, restaurant, children's lounge and play area. The applicant's representative told staff that the gym/exercise area is really too small and it could be enlarged very easily by enclosing a ground floor breezeway approximately 10 feet by 34 feet. Enclosed photos show the area.

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No letters either in support or in opposition to the request have been received by the staff.

3. Section 12.24-F of the Los Angeles Municipal Code provides in part:

"F. Existing Uses. Any lot or portion thereof being lawfully used for any of the purposes enumerated in this section at the time the property is first classified in a zone wherein such use is not permitted by right or at the time the use is prohibited by reason of an amendment to this Article changing the permitted uses within the zone, shall be deemed to be approved site for such conditional use which may be continued thereon. Further, the conditions included in any special district ordinance, exception or variance which authorized such use shall also continue in effect ..."

Copies of the Department of Building and Safety and City Planning Department records indicate that a tennis club use has been conducted at the subject location for approximately 29 years. The tennis club was established under Case No. ZA 17087. During this period, the use has not been discontinued. Ordinance No. 164,904 became effective July 7, 1989. This ordinance provides for conditional use authorization for the subject use when such use is located in the A, R1, RU, RZ, RMP, RW1, R2, RD, RW2, R3 or RE11 Zones. As the use legally existed under Case No. ZA 17807 84-100, the use enjoys deemed to be approved conditional use status.

4. Authority for Plan Approval - Section 12.24-G of the Los Angeles Municipal Code provides in part:

"G. Development, Change or Discontinuance of Uses:

1. Development of Site. On any lot or portion thereof on which a conditional use is permitted pursuant to the provisions of this section, new buildings or structures may be erected, enlargements may be made to existing buildings, existing uses may be extended on an approved site, and existing institutions or school developments may be expanded as permitted in Subsection F of this Section, provided plans therefore are submitted to and approved by the Commission or by a Zoning Administrator, whichever has jurisdiction at that time ...

The proposed expansion is to enclose a section of the ground floor breezeway of approximately 10 feet by 34 feet adjacent to and opening into the existing exercise area to allow additional room for exercise at the Mulholland Tennis Club. As such, the expansion is minor and is within the guidelines for such expansion as established by the Office of Zoning Administration.

5. The Bel Air-Beverly Crest Community Plan designates the subject property for Minimum Density with corresponding zones of A1, A2, RE40 and Very Low II Density with corresponding zones of RE15 and RE11 and Height District 1.

2310090008

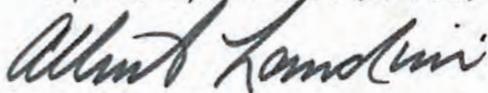
The National Flood Insurance Program flood insurance rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 154,405, have been reviewed and it has been determined that this project is located in Zone C, areas of minimal flooding. (No shading)

On December 16, 1992, the subject project was issued a Notice of Exemption (Article III, Section 3, City CEQA Guidelines), log reference CE 92-1303, for a Categorical Exemption, Class 1, Category 5, City CEQA Guidelines, Article VII, Section 1, State EIR Guidelines, Section 15100. I hereby certify that action.

Fish and Game: The subject project, which is located in Los Angeles County, will not have an impact on fish or wildlife resources or habitat upon which fish and wildlife depend, as defined by California Fish and Game Code Section 711.2.

#### NOTICE

Congestion Management Program (CMP): The CMP is a new program enacted by the State Legislature with the passage of Assembly Bill 471 (July 10, 1989), as amended by Assembly Bill 1791 (February 11, 1990). The CMP's intent is to coordinate land use, transportation and air quality decisions on the regional highway and roadway system as defined by the Congestion Management Agency (CMA). The owner of any project or structure which contributes to the degradation of this system, based on standards adopted by the CMA, due to unmitigated trips, may be subject to additional trip mitigation measures to be imposed by the CMA (LACTC).



ALBERT LANDINI  
Associate Zoning Administrator

AL:lmc

cc: Councilman Zev Yaroslavsky  
Fifth District  
Adjoining Property Owners  
County Assessor  
Margaret Richardson

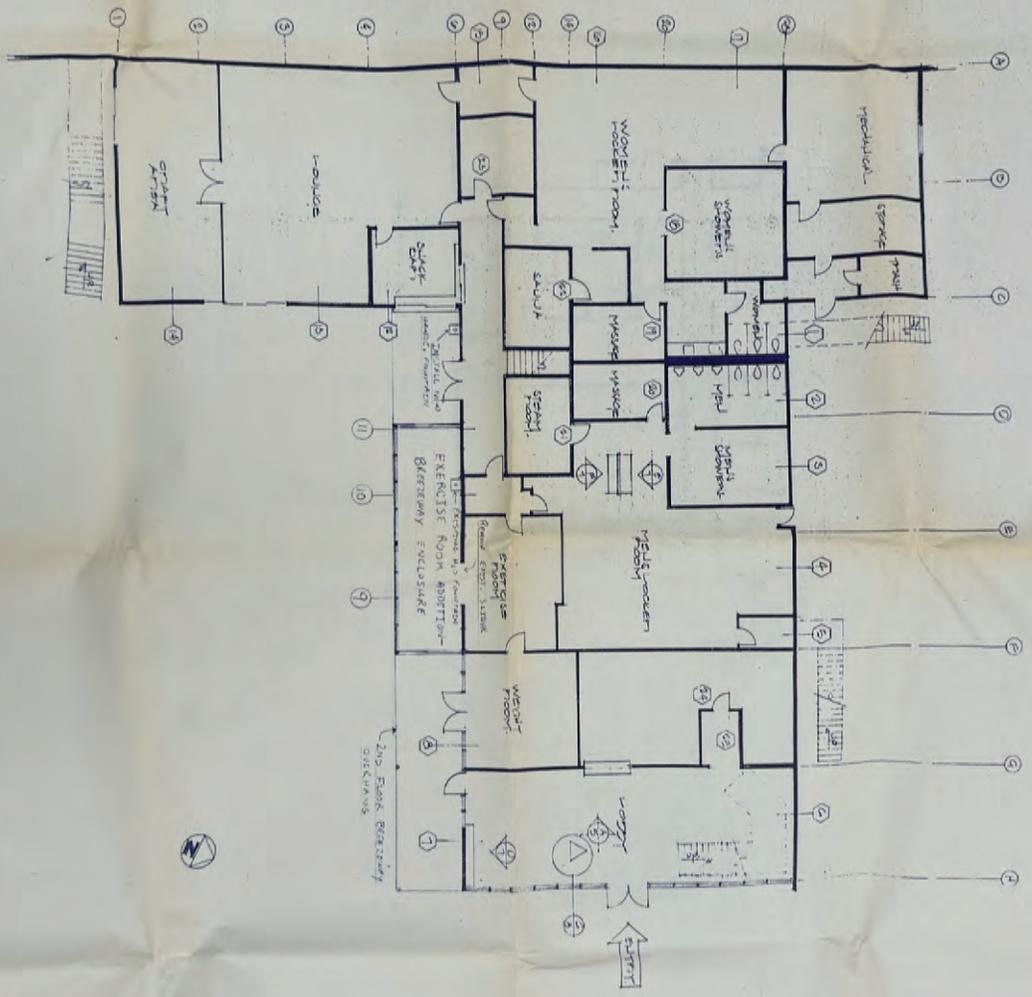
2310090009

# Approved Plans



2A 18305 / 1A

REVISIONS	DATE	SCALE	BY	CHECKED BY	FLOOR NO.	SOFT
1		1/2" = 1'-0"				
2						
3						
4						
5						



**General Notes:**  
 1. ALL DIMENSIONS ARE IN FEET AND INCHES UNLESS OTHERWISE NOTED.  
 2. ALL WORK IS TO BE ACCORDING TO THE LATEST EDITIONS OF THE BUILDING CODES AND SPECIFICATIONS.  
 3. ALL MATERIALS AND METHODS OF CONSTRUCTION ARE TO BE APPROVED BY THE ARCHITECT.  
 4. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS.  
 5. THE CONTRACTOR SHALL MAINTAIN ACCESS TO ALL ADJACENT PROPERTIES AT ALL TIMES.  
 6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROTECTING ALL EXISTING UTILITIES AND STRUCTURES.  
 7. THE CONTRACTOR SHALL MAINTAIN A SAFE WORKING ENVIRONMENT AT ALL TIMES.  
 8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL ADJACENT PROPERTIES.  
 9. THE CONTRACTOR SHALL MAINTAIN ACCESS TO ALL ADJACENT PROPERTIES AT ALL TIMES.  
 10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROTECTING ALL EXISTING UTILITIES AND STRUCTURES.  
 11. THE CONTRACTOR SHALL MAINTAIN A SAFE WORKING ENVIRONMENT AT ALL TIMES.  
 12. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL ADJACENT PROPERTIES.

PLOT PLAN

THE UNIVERSITY OF CALIFORNIA  
 LOS ANGELES

2ND FLOOR ELEVATION REF PLAN





# **EXHIBIT C**

Documented Evidence of Noncompliance with Entitlements

<b>Date</b>	<b>Time</b>	<b>Event</b>
October 14, 2023	12:28 PM	Valet service parking vehicles in neighborhood; Club guests' parked vehicles back-to-back lining both sides of the road; several cars entering and exiting the Club driveway within a matter of seconds.
	3:44 PM	Outdoor event with amplified music.
February 19, 2024		Private investigator asked about hosting event without member association; Club approved.
November 15, 2024	7:29 PM	Beeping delivery truck audible from Palermo property.
November 16, 2024	1:57 PM	Club guests' parked vehicles back-to-back lining both sides of the road.
November 23, 2024	7:22 PM	Colorful party lights in Club dining room and projected into the sky; visible from Palermo property.
	7:30 PM	Party lights visible and amplified music and voices audible from Club parking lot.
	10:54 PM	Tennis court LED flood lights visible from Palermo property.
December 7, 2024	8:10 PM	Tennis court LED flood lights visible from street below the Club.
December 18, 2024	10:12 PM	Tennis court LED flood lights visible from Palermo property.
March 2025		GQ Magazine editorial photoshoot at Club.
May 3, 2025	9:40 PM	Party lights visible and amplified music and voices audible from Club parking lot.
	10:00 PM	Colorful party lights in Club dining room visible from Palermo property.
September 7, 2025		Event with loud noise and lighting effect; Club guests' parked vehicles back-to-back lining both sides of the road [documented by Palermos' neighbor]

October 18, 2025	7:19 PM	Colorful party lights in Club dining room visible from Palermo property.
	10:10 PM	Beeping delivery truck audible from Palermo property.
	11:00 PM	Colorful party lights in Club dining room visible from Palermo property.
October 31, 2025	6:18 AM	Tennis court LED flood lights visible from street below the Club.
November 8, 2025	3:07 PM	Sounds associated with delivery of party rentals audible from Palermo property.
	9:05 PM	Party lights visible and amplified music and voices audible from Club parking lot.
	9:35 PM	Colorful party lights in Club dining room visible from Palermo property.
	10:15 PM	Three delivery trucks arrive to the Club to load party rentals; beeping as the trucks back into the Club driveway.
	11:37 PM	Sounds associated with teardown of party rentals audible from Palermo property.
November 9, 2025	12:22 AM	Noises associated with delivery of party rentals audible from Palermo property.
November 15, 2025	6:21 PM	Delivery vehicles parked in Club parking lot; colorful lights in Club dining room visible from Club parking lot.
	9:22 PM	Colorful party lights in Club dining room visible from Palermo property.
December 4, 2025	11:15 AM	Club guests' parked vehicles back-to-back lining both sides of the road; several vehicles crowding driveway to the Club.
	11:20 AM	Valet service stand at Club entrance; Club guests' parked vehicles back-to-back lining both sides of the road.
	11:50 AM	Holiday market shopping/wellness event unrelated to tennis hosted by Club.
December 13, 2025	2:03 PM	Beeping delivery trucks backing into Club driveway.

	9:22 PM	Party lights visible from Club parking lot.
	10:13 PM	Tennis court LED flood lights and delivery trucks visible at Club.
	11:22 PM	Sounds associated with teardown of party rentals audible from Palermo property.
	11:26 PM	Delivery trucks leaving Club.

Evidence of Retail Sales

1/9/26, 5:00 PM

Gmail - Weekly Update, Friday May 24th



*30% Off our Winter Logo Merchandise*

Stop by and grab a top, windbreaker, shorts, socks, leggings and more, with 30% Off. **\*\*EXCLUDES Wilson Items, Balls and our Logo Sweat Shirts.**

MULHOLLAND TENNIS CLUB

2555 Crest View Drive, Los Angeles, CA 90046

(323) 944-2900

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This message was sent to you based on your notification preferences in your membership profile settings.

This is a no-reply email. For questions or concerns, please log in and contact a club representative. This message was sent to Alexander Palermo <rome2ia@sbglobal.net> by Mulholland Tennis Club. [Click here to unsubscribe from further communications.](#)

<https://mail.google.com/mail/u/0/?ik=0de345d234&view=pt&search=all&permthid=thread-f:1799992880207576125&simpl=msg-f:1799992880207576125&simpl...> 5/18

1/9/26, 5:00 PM

Gmail - Weekly Update, Friday May 24th

**In honor of the French Open, Chef Nicolas has created a themed menu, available at dinner June 5-9.**  
The Special Menu will include :

**POTATO & LEEK VELOUTE SOUP \$10.00**  
CHIVES AND BACON  
**DUCK CONFIT AND RASPBERRY SALAD \$18.00**  
ARUGULA, SHAVED FENNEL, HONEY RASPBERRY VINAIGRETTE, TOASTED ALMONDS  
**ROASTED NORTHERN HALIBUT, LOBSTER TARRAGON BISQUE SAUCE \$38.00**  
BRAISED LEEKS, SAFFRON BASMATI RICE, ASPARAGUS  
**FLOATING ISLAND \$12.00**  
MERINGUE, CRÈME ANGLAISE, CARAMEL

TO REGISTER

## INTERCLUB TOURNAMENT WITH FOOTHILL CLUBS LEAGUE

Date: Saturday, June 1, 2024

Time: 12:00 pm - 8:00 pm

Participating Clubs: *The Valley Hunt Club, Altadena Town & Country Club, Toluca Lake Tennis & Fitness Club, Flint Canyon Tennis Club, Live Oaks Tennis Association, Mulholland Tennis Club*

Cost: \$40 per person, includes play and cocktail party @ Altadena Town & Country Club.

TO REGISTER

**MDW SALE ENJOY 30% OFF  
IN OUR PRO SHOP**

←  
PRO SHOP  
SALE

<https://mail.google.com/mail/u/0/?ik=0de345d234&view=pt&search=all&permthid=thread-f:1799992880207576125&simpl=msg-f:1799992880207576125&simpl...> 4/18

DECEMBER 3, 2024 minutes

TENNIS OFFICE IS A SHOP SALES OF MERCHANDISE

- o Turkey Burn & Turkey Shoot: Successful events with great turnout.
- o Black Friday Sales: \$1,000 over target from Sue's sales of last season's merchandise.
- **Upcoming Events:** Trivia, Screening of Challengers, Winter Solstice Sound Bath, Ugly Sweater Tournament, Member Holiday Party, Breakfast with Santa, New Year's Event, Variety Show (January), Comedy Showcase (February).
- **Employee Relations:**
  - o Planning annual Thanksgiving dinner for the team
  - o **New hires:** Luke (Tennis), Samara (Dining), Aja (Kitchen)
  - o **Departures:** Angelica (other job opportunities)
  - o **Temp:** Leon and Raegen (covering childcare needs)

**Facilities & Maintenance**

- **Tree Trimming:** Completed
- **Parking Lot:** Currently being resealed
- **AC Repairs:** Completed in the kitchen
- **City Inspection:** New heating system passed inspection

**Administrative Focus**

- **Budget Work:** Ongoing collaboration with Kari
- **Holiday Bonuses:** Finalizing hourly team bonuses
- **Pool:** GM is gathering bids for new Pool Maintenance team. Looking for lower cost with better upkeep.

Mulholland Tennis Club  
2024 CAPITAL COSTS

GL #	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD Total
<b>Additions:</b>													
1 ProShop - Marble	2,445												2,445
2 HVAC Heater Update - Steam Tech	2,241												2,241
3 New Spa Heater		4,451											4,451
4 Chair & Table Refinishing		11,596											11,596
5 Upper Lounge/Tennis Deck Service Station		505	2,179							1,725			4,414
6 Pool Umbrellas			1,965	1,965									3,930
7 Flooring					5,950			2,086	865	6,250			16,257
8 Boiler					11,114								11,114
9 Kitchen Equipment						3,555							3,555
10 Parking Lot Wall Replacement						6,300							6,300
11 Phone System Upgrade						4,845							4,845
12 Tennis Deck Cushions							9,010						9,010
13 Motorized Shades								2,060					2,060
14 Kitchen Monitors									1,088	5,472			6,560
										9,686			9,686
<b>NET TOTAL</b>	<b>4,690</b>	<b>16,356</b>	<b>4,144</b>	<b>1,965</b>	<b>18,064</b>	<b>14,730</b>	<b>9,010</b>	<b>4,146</b>	<b>2,048</b>	<b>23,130</b>			<b>98,483</b>

- **Landscaping:** GM is gathering bids for a new company focused on native plants and drought tolerant landscaping.
- **Flatware & Tableware Order:** Chef is putting together bid for updated flatware and tableware (plates, bowls etc) to replace current sets.

**Digital Marketing Update**

- **2025 Content:** Working on Instagram post schedule and content calendar for the year
- **Fine tuning weekly update format**

# **EXHIBIT D**

# TIFFANY and RANKIN INVESTIGATIONS, INC.

License Nos. CA 188788 WA 2482 OR 74532  
135 E. Olive Ave., #321, Burbank, CA 91503  
Phone: (818) 590-3252

## CONFIDENTIAL INVESTIGATIVE REPORT

Prepared for:

Date: March 7, 2024

Valentina Palermo  
8341 Skyline Dr.  
Los Angeles, CA 90046

### UPDATED -- Event Investigation

Subject: MULHOLLAND TENNIS CLUB – December 10, 2023

File No: PRIVATE EVENT

Property Address: 2555 Crest View Dr., Los Angeles, CA 90046

The following is an updated report regarding private events at the Mulholland Tennis Club.

#### FINDINGS:

Mulholland Tennis Club allows for non-members to hold private events at the club. On Friday, Feb 16<sup>th</sup>, after arranging for a credit card payment, a \$1000 deposit was made to reserve the club for an engagement party June 29<sup>th</sup>. The club has a "NonMember Event Contract" with meta data stating the document was created 5/4/2023. The price list shows the different prices for members and non-members to reserve the facility.

#### EVENTS:

On 1/18/2024, I called the Mulholland Tennis Club (MTC) and asked about hosting an event. A man by the name of "Danny" answered and asked if I had a member who could sponsor my event. I said I did not. He said, "That's okay." He said to email Chris F. at [chris@themtc.org](mailto:chris@themtc.org).

On 1/19/2024 I spoke with Chris Finley with MTC. He stated I could reserve the facility for my private event. He reported there is a \$1000 deposit to reserve the facility. One half of the final costs must be paid no less than two weeks prior to the date and the final

TiffanyAndRankin.com

Confidential Notice: This information is for the sole use of the intended recipients and may contain confidential, privileged information. If you are not an intended recipient, please contact sender by telephone or email and destroy this report and all copies of it.

## TIFFANY and RANKIN INVESTIGATIONS, INC.

payment is due the day of the event. He stated I could pay with a credit card. At no time did he ask if I was a member or if I knew a member who could sponsor me.

I asked about decorations and he stated he would provide lighting but balloons or other decorations would be my responsibility. I asked him about the pricing for using two locations (outside and inside). He emailed me the contract and price list. Finlay stated and emailed he would provide a discount if I used two locations. The price list has separate pricing for members and non-members to reserve the facility but not for food or beverages.

Finley stated March 16<sup>th</sup> and March 23<sup>rd</sup> are available for the event. The Non-Member Event Contract provided the deposit was non-refundable 90 days prior to the event. The meta data on the word document reported the document was created 5/4/2023.

Through a number of emails, Finlay wrote he would reduce the total cost from \$7500 to \$6000 for both the Dining Room and Club Lounge. The price list shows the non-member rate as \$4500 for the Main Dining Room and \$3000 for the Club Lounge. A member would pay \$3000 and \$2000 respectively or a total of \$5000.

I changed the date to June 29<sup>th</sup>, four months in the future. On Feb 9<sup>th</sup>, I spoke with Finlay regarding my event, asking about security and valet. I confirmed my event verbally and followed-up with an email asking him to send a link for a credit card payment. Finlay reported he was waiting for the General Manager to arrange for the payment.

The \$1000 payment was made Feb 16<sup>th</sup> through the link [https://invoice.stripe.com/i/acct\\_1Mvoy8EcZ3gFEU8b/live\\_YWNjdF8xTXZveThFY1ozZ0ZFVThiLF9QWjBpYXV0YmpZd0hZRThiNWNkRk1MeEdkMVRTZG1ILDk4NDk3MzMw0200XEX349gx?s=em](https://invoice.stripe.com/i/acct_1Mvoy8EcZ3gFEU8b/live_YWNjdF8xTXZveThFY1ozZ0ZFVThiLF9QWjBpYXV0YmpZd0hZRThiNWNkRk1MeEdkMVRTZG1ILDk4NDk3MzMw0200XEX349gx?s=em)

On Feb 23<sup>rd</sup>, I emailed Finlay asking him to cancel my event and return the \$1000 deposit. He replied four days later that he will "have your deposit returned immediately." Finlay emailed March 6<sup>th</sup> and included the email wording from the Accounting Manager Kari Phillipps writing a wire refund will take 1 – 5 days. No refund has been made to date. 7

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### PRIOR FINDINGS 12/11/2023:

The LVBL and Racquet Club LA Dream Team Invitational was held Sunday, December 10 at the Mulholland Tennis Club. The event was promoted on Instagram and the LVBL website home page.

Food, beer, and wine was sold at the outdoor bar. The parking lot was full of cars. A large number of cars were parked in the main driveway, obstructing traffic. One car

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parked on Skyline blocked the driveway for a neighboring resident. A large number of cars were parked on Crest View.

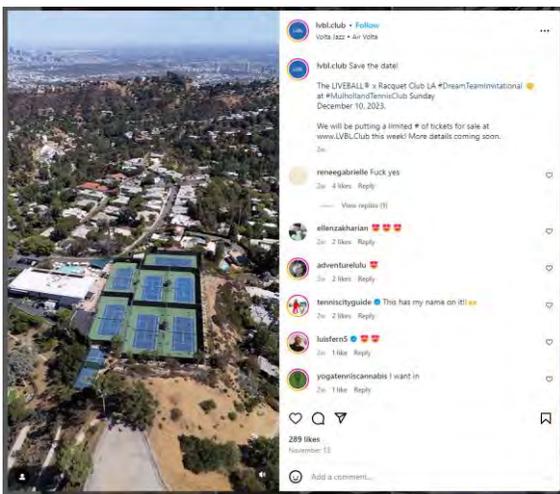
## SOCIAL MEDIA:

The event was promoted on the following websites and Instagram Accounts.

Home Page of LVBL <https://lvbl.club/>

Instagram Account of lvbl.club -- <https://www.instagram.com/lvbl.club/> on

Nov. 13, 2023 Post - <https://www.instagram.com/p/CznM3M8Oqj4/>



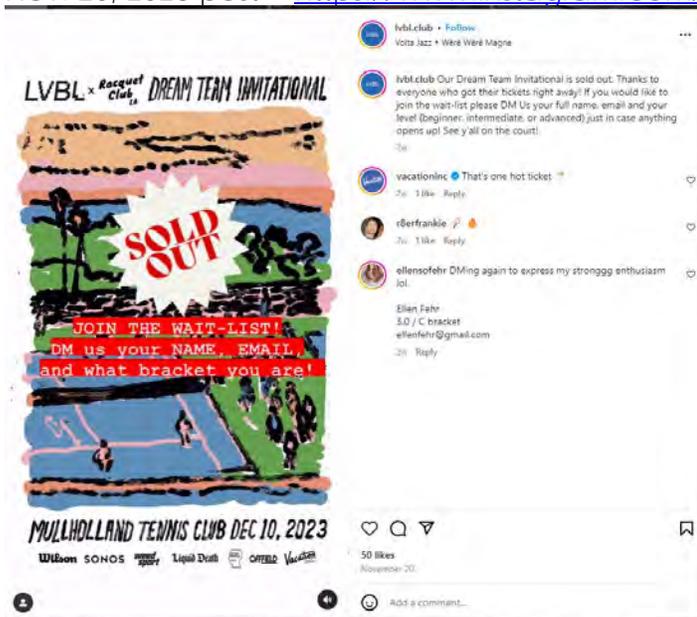
Nov. 18, 2023 post - [https://www.instagram.com/p/CzzUecVSJ\\_h/?img\\_index=1](https://www.instagram.com/p/CzzUecVSJ_h/?img_index=1)

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Nov. 20, 2023 post -- <https://www.instagram.com/p/Cz4MQUGvWHU/>



Instagram Account of rcla\_tennisclub

[https://www.instagram.com/rcia\\_tennisclub/?img\\_index=1](https://www.instagram.com/rcia_tennisclub/?img_index=1)

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Nov. 18 Post (shared with lvbl.club)

[https://www.instagram.com/p/CzzUecVSJ\\_h/?img\\_index=1](https://www.instagram.com/p/CzzUecVSJ_h/?img_index=1)



Videos showing the posts have been saved.

DECEMBER 10, 2023

A visit to the club occurred between 12:40 and 1:00 pm.

The room described as the Senior Lounge was used as a check-in for the LVBL event. A food and beverage buffet was visible outside the north doors of the Senior Lounge.

A large number of people were assembled in front of the tennis courts. Vendors were selling items.

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An outdoor bar was selling food, beer, and wine. As seen below, beer was \$10 and wine was \$15. No credit cards were accepted, only cash.

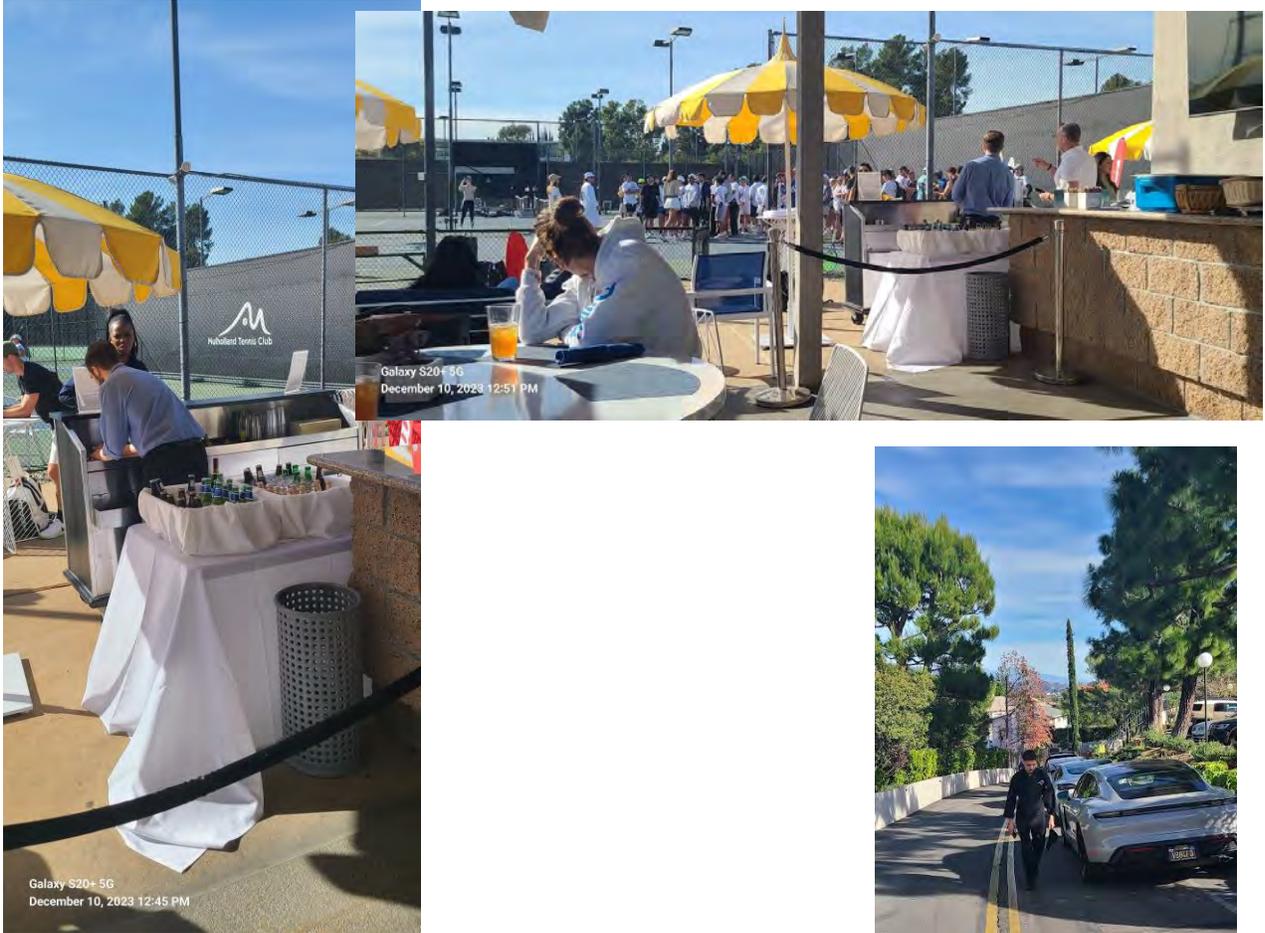


was

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A large number of cars were parked in the parking lot. A number of cars were parked in the driveway, partially obstructing the exit.



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Many cars were parked on Crest View. One car parked on Skyline Dr blocked a neighbor's driveway.



If we can be of further assisted, we would be pleased to respond.

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Sources utilized in this investigation may include records of the California, Washington, and Oregon Criminal, Civil and Family Court Records, National Criminal Records, United States District Court Records, Liens and Judgments Index, Internet, National Newspapers, Scholastic Sources, Employment Sources, and confidential proprietary sources. This agency endeavors to verify the accuracy of information where feasible however, we cannot guarantee the accuracy of information which is provided to it by third parties. The Client therefore understands and agrees to accept all risk of reliance on such information.

This report was prepared and respectfully submitted by:

Carrie Tiffany  
CTiffany@TiffanyAndRankin.com

TiffanyAndRankin.com

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# **EXHIBIT E**



January 27, 2026

To: Andres Gutierrez, City Planner  
Jordann Turner, City Planner  
City of Los Angeles, Department of City Planning  
200 North Spring Street, Room 763  
Los Angeles, CA 90012  
Sent via email to: [Andres.Gutierrez@lacity.org](mailto:Andres.Gutierrez@lacity.org)  
[Jordann.Turner@lacity.org](mailto:Jordann.Turner@lacity.org)

Re: 2555 N. Crest View Drive ZA-2024-1881-ZV  
Mulholland Tennis Club ENV-2024-1882-CE  
Public Hearing, February 10, 2026

Dear Andres Gutierrez and Jordann Turner,

The Bel Air - Beverly Crest Neighborhood Council (BABCNC), Planning & Land Use Committee (PLU) respectfully requests that you **continue** the current posted hearing date of February 10, 2026, for the above noted case, and **hold open** this pending case for sixty (60) days.

This request to extend the City’s hearing date is for the following reasons.

1. On February 10, 2026, the BABCNC PLU Committee, at its regularly scheduled meeting, has scheduled a public hearing and review of this project. On this date it is anticipated that the PLU Committee will make a recommendation to the full BABCNC Board.
2. On February 25, 2026, the full BABCNC Board, at its regularly scheduled public meeting will have the opportunity to hear testimony from both the Applicants and the Community, and to take a position on this project.

The BABC Neighborhood Council has been receiving significant input from the Community over the past several months on this project. Extending the City’s hearing date to after the BABCNC conducts their public hearings, will give the Applicants, Community and Stakeholders a public forum to voice their justifications and concerns regarding the proposed project and request.

Page 1 of 2

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Vice President – Operations  
**Robin Greenberg**  
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**Ellen Evans**  
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**Timothy Steele, Ph.D.**  
Treasurer  
**Vadim Levotman**

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Planning and Land Use – **Jamie Hall/Michael Kemp**  
Bylaws, Rules and Elections – **Ellen Evans**  
Public Safety and Emergency Preparedness –  
**Vadim Levotman/Jonathan Brand**  
Outreach – **Robin Greenberg**  
Traffic Committee – **Irene Sandler**  
Public Works and Telecommunications –  
**Timothy Steele, Ph.D.**  
Budget and Finance – **Vadim Levotman**

**STAKEHOLDER GROUPS**

Bel Air Association  
Bel Air Crest Master Association  
Bel Air Hills Association  
Bel Air Ridge Association  
Benedict Canyon Association  
Casiano Estates Association  
Doheny-Sunset Plaza Neighborhood Assn.  
Holmby Hills Homeowners Association  
Laurel Canyon Association  
Residents of Beverly Glen

**RESIDENTIAL DISTRICTS**

Bel Air Glen District  
Franklin-Coldwater District  
North of Sunset District  
**NON-RESIDENTIAL REPRESENTATION**  
At-Large Members  
Commercial or Office Enterprise Districts  
Custodians of Open Space  
Faith-Based Institutions  
Public Schools  
Private Schools K–6 and 7–12

January 27, 2026  
BABCNC Request for Hearing Continuance  
Mulholland Tennis Club  
ZA-2024-1881-ZV  
Page 2 of 2

Once the BABCNC hearings are conducted we will advise you of the response and any recommendation that the Neighborhood Council would like to enter into the hearing for the case.

Thank you for your time and consideration in this matter.

Respectfully,

*Michael A. Kemp*

Michael A. Kemp, AIA  
Co-Chair, Planning & Land Use Committee  
Bel Air - Beverly Crest Neighborhood Council