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RECEIVED

AUG 01 2017

City of Riverside
City Clerk's Office

August 1, 2017

Riverside City Clerk
3900 Main Street
7th Floor
Riverside, CA 92522

Via regular and email: city_clerk@riversideca.gov

Re: Ping Guo/Lavender Body Care/ NOTICE OF APPEAL

Dear Sir or Madam:

In accordance with Riverside Municipal Code Section 5.52.140, my client Ping Guo hereby appeals the decision of the Chief of Police to revoke the massage establishment permit issued for Lavender Body Care.

The grounds for the appeal are that there is insufficient, legally competent, evidence to support the decision. In addition, the City's procedures for revoking business permits are violative of the 5th and 14th Amendments' Due Process Clause in that they fail to provide substantive and administrative Due Process in the protection of fundamental rights. See e.g. *Gray v. Superior Court* (2005) 125 C.A. 4th 629, 636.

Further, the decision to revoke fails to specify the basis for the decision in terms sufficiently specific to permit a reasonably informed decision on: (a) whether to pursue an appeal and (b) how to prepare an intelligent, effective defense. See e.g. *Gresher v. Anderson* (2005) 127 C.A. 4th 88.

REQUEST FOR DISCOVERY

The Permittee hereby requests that, within 10 days, he be provided with the names, addresses and telephone numbers of each and every witness upon whose testimony the City may rely in this administrative action; any and all statements of witnesses,

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August 1, 2017

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and all documentary evidence upon which the City relies in this action.

Thank you for your prompt attention to this matter and your anticipated cooperation. Please direct all further correspondence to this office.

Very truly yours,


Jonathan K. Golden

JKG:lom