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RECEIVED

MAR 29 2018

City of Riverside
City Clerk's Office

March 28, 2018

Via Personal Delivery

City of Riverside
Riverside City Clerk
3900 Main St,
Riverside, CA 92522

Coco Relaxations
Ms. Ying Wang
11241 Metcalf Lane
Riverside, CA 92505

**RE: NOTICE OF APPEAL OF REVOCATION OF MASSAGE ESTABLISHMENT
PERMIT FOR COCO RELAXATIONS**

Dear City of Riverside Public Safety Committee,

This letter serves as proper written notice of Coco Relaxation's right to appeal the Riverside Police Department's decision to revoke its massage establishment permit. On March 22, 2018, the Deputy Chief of Operations conducted a hearing to determine if Coco Relaxations had any evidence concerning the decision to revoke the massage establishment permit. On or about March 27, 2018, Coco Relaxations received notice that the revocation of the massage establishment permit is being upheld. As provided in the Police Department's letter, Coco Relaxations is exercising its right under Riverside Municipal Code Section 5.52.140 to appeal the decision within ten (10) calendar days after receiving the written correspondence from the Police Department.

In the letter directed to Coco Relaxations, City of Riverside Police Department provides that on March 22, 2018, the Deputy Chief of Operations conducted a hearing to determine if the establishment had any evidence to refute the factual allegations that lead to the *proposed* revocation. Later into the letter, it states that "Coco Relaxations must remain closed until the appeal is heard by the Public Safety Committee and a decision is made whether or not to uphold the revocation of the Massage Establishment Permit. Throughout this time of appeal, Coco Relaxation's Massage Establishment Permit was not revoked. Instead it was *proposed to be*

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revoked. Therefore, without prior determination of revocation the massage establishment must remain open where failure to would violate Coco Relaxation's protected constitutional rights to due process. Furthermore, by making the decision for Coco Relaxations to remain closed pending the appeal determination, has caused my client undue harm and countless loss in business. Daily my client loses customers and soon will be unable to make rent payments. Prior to final determination at appeal, and thorough out the course of that period, many of its customers will not return due to this decision. Thus, Coco Relaxations must remain open pending determination at appeal.

As such, please provide my office with the time, date, and address of where the hearing will be held. Should you have any questions, please feel free to contact my office at the information provided above.

Sincerely,

Long Z. Liu, Esq.
Liu Law, Inc.
529 E. Valley Blvd., Suite 208/A
San Gabriel, CA 91776
Attorney for Coco Relaxations

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PROOF OF SERVICE

On March 29, 2018 I served the foregoing document described as **NOTICE OF APPEAL** on all interested parties in this action as set forth on the attached service list in the following manner:

☐ **BY MAIL:** I am familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **BY FACSIMILE:** In addition to service by mail as set forth above, a copy of said document(s) was also delivered by facsimile transmission to the addressee(s) pursuant to Code of Civil Procedure §1013(e).

☐ **BY OVERNIGHT MAIL:** I caused said document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☒ **BY PERSONAL SERVICE:** By causing personal delivery of the document listed above to the person at the address set forth on the attached service list.

☐ **BY ELECTRONIC SERVICE** By electronically mailing a true and correct copy through the electronic mail system to the e-mail address(s) set forth below, or as stated on the attached service list per agreement in accordance with Code of Civil Procedure section 1010.6.

☒ **STATE:** I Declare, under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 29, 2018 at San Gabriel, California.

Ying Wang

SERVICE LIST

CITY OF RIVERSIDE
RIVERSIDE CITY CLERK
3900 MAIN ST.
RIVERSIDE, CA 92522