

September 6, 2016

Via Email and US Mail

TIME SENSITIVE – RESPONSE REQUIRED

Shawn (Shahrooz) Entezam
sentezam@hotmail.com
8424 Grand View Drive
Los Angeles CA 90046

Re: CEASE AND DESIST - TRESPASS, NUISANCE, AND REPETATIVE VIOLATIONS AFFECTING YOUR NEIGHBORS AT 8410 GRAND VIEW DRIVE

Mr. Entezam.

This office represents Jason Swing and his family. As you are aware, Mr. Swing and his young family (including small children ages 4,6 and 11) reside full time in the home adjoining, and sharing part of the driveway with, your property located at 8424 Grand View Drive in Los Angeles. Over the past year, you have begun renting your property to strangers for as little as one or two nights at a time, on an increasingly regular basis. As you know, these short term/transient renters have been using your property as a location for parties in the Hollywood Hills. These "party renters" have invited numerous people, many of whom are merely acquaintances or even strangers, to their parties. The throngs of people invited to your property often stay up all night making a lot of noise, yelling, screaming obscenities, coming onto my clients' property, urinating on their driveway and bushes and around their pool, engaging in lewd behavior, knocking on the door after 10 pm at night and even into the early morning asking where so and so's party is, blocking the driveway, even parking in my clients' garage which caused my clients to fear they were subject to a home invasion, using my clients' pool area as if it were their own yard, or worse, throwing cigarette butts, bottles, cans, or even drug paraphernalia on their yard, surveying my clients' property and even taking film and pictures of and into their home, and on and on. My client has over a dozen complaint emails to you on the record dating back to 2014, as well as documented photos and surveillance of many incidents.

The behavior cited above constitutes nuisance and trespass, and you have been informed that it is causing my clients undue stress, lack of sleep, anxiety, loss of work and ability to function, and is disturbing their rights to comfortable enjoyment of their life and property. The circumstances are affecting my clients' health, and the income of the adults in the family. Much of the behavior is obviously indecent and offensive to the senses, especially when there are children present and people trying to sleep. The area is not zoned for a nightclub. Any reasonable neighboring resident in my clients' positions would be annoyed and disturbed by what is going on at all hours of the night at 8424 Grand View. Trying to peacefully reside in my clients' home and on their property has become impossible on the many "party" nights you allow your short term renters to

have next door, and due to the trespass and nuisance that is tolerated, and in fact encouraged, by your behavior.

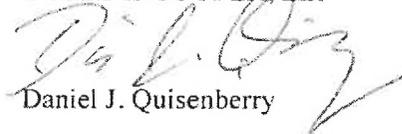
Mr. Entazem, you do not appear to care because you do not reside in the home, or even in the neighborhood, and so you personally are not affected by the purposes for which you rent your house. However, as the owner of the property, and especially as the proprietor who invites all of these people to your property and even profits from it, you are ultimately responsible for their behavior. The law in California is that by renting and using your home in this manner, and by failing to act to avoid and prevent such disturbances and trespasses, you have created and permitted these conditions to exist - You are liable. You have been notified on numerous occasions of the disturbing and even threatening activities of your guests and/or the invitees of your guests, have done nothing to stop the behavior, and therefore these activities can now be deemed reckless and/or intentional. Because the nuisance and trespass has become reckless and intentional, if litigated, my clients will likely be awarded punitive damages in addition to their actual damages, damage to their health, diminishment of their quiet enjoyment of their own property, pain and suffering, and loss of income.

The Swing family has been very tolerant of your behavior, has tried over and over again to notify you of what is going on, and has given you every opportunity to stop the trespassing and nuisance. It is doubtful that you have complied with even the most basic tax and business license laws of Los Angeles to use your property as a short term rental.

At this time, you are (again) being officially notified that the situation has become completely intolerable, and is causing severe health and anxiety problems (and very dangerous situations). We, on behalf of the Swing family, demand that you cease and desist from allowing your property to be used for late night parties and very short term (AirB&B and vrbo.com) rentals, and notify this office of any and all efforts you have made and will make to prevent the nuisance and trespass activities from occurring again. If we do not receive a response and commitment from you to stop the above behaviors, and a written description of your plan to prevent such things for occurring in the future, by this Friday, September 9, 2016, we will be forced to pursue these matters legally, and to seek court and local authority intervention and substantial damages. All rights in this regard are expressly reserved.

Sincerely,

YOFFE & COOPER, LLP


Daniel J. Quisenberry