Office of the Los Angeles City Attorney
Hydee Feldstein Soto

April 15, 2025

Petty Santos, City Clerk
200 North Spring St., Room 395
Los Angeles, CA 90012

Re: **Council File 16-1104-S3 (Proposed Amendments to Council Rules 7 and 63 Prohibiting Use of the N-Word and C-Word)**

Dear Ms. Santos:

Please find attached a written threat of litigation relating to Council File CF 16-1104-S3, in which the author who identifies himself as Zuma Dogg threatens to take legal action in Federal Court if the City Council adopts the proposed amendments to the Council Rules prohibiting use of the N- and C-words and their variants.

Please place this letter in the Council File. Thank you.

Sincerely,

Strefan Fauble
Assistant City Attorney

Enclosures

Communication from Public

Name: Zuma Dogg
Date Submitted: 03/30/2025 07:30 PM
Council File No: 16-1104-S3
Comments for Public Posting: Marqueece Harris-Dawson's motion to ban certain words is a clear violation of Judge Dean Pregerson's FEDERAL RULING against L.A. City Council censoring public comment speakers from 2013. Dawson says he can't wait to get in front of a judge in court; but the judge has already ruled on this issue: Here is an excerpt from Judge Dean Pregerson's 2013 Federal ruling regarding public comment at L.A. City Council meetings (First Amendment): "In one of the largest cities in the world, it is to be expected that some inhabitants will sometimes use language that does not conform to conventions of civility and decorum, including offensive language and swear-words. As an elected official, a City Council member will be the subject of personal attacks in such language. It is asking much of City Council members, who have given themselves to public service, to tolerate profanities and personal attacks, but that is what is required by the First Amendment. While the City Council has a right to keep its meetings on topic and moving forward, it cannot sacrifice political speech to a formula of civility. First Amendment jurisprudence is clear that the way to oppose offensive speech is by more speech, not censorship, enforced silence or eviction from legitimately occupied public space." Gathright v. City of 18 Portland, Or., 439 F.3d 573 ### Clearly, Marqueese Harris-Dawson's new motion attempting to ban certain words is in violation of this ruling. Dawson knows this. So why is he trying to violate Federal law? Additionally, it is illegal to ban members of the public from speaking at upcoming meetings as proposed in this motion. It's called, "prior restraint." And, again, it's a violation of Federal law. Former Council President Paul Krekorian didn't make a motion attempting to ban certain words because he KNEW the issue was already settled and knew it was in violation of the law. So, why is the current Council President Marqueece Harris-Dawson preparing to break the law when he KNOWS it's illegal? I am demanding that this motion be pulled. If Council continues to move forward, I will be taking legal action, in Federal Court, with Judge Dean Pregerson to prevent L.A. City Council from breaking the law. YouTube VIDEO: Zuma Dogg Weighs In On Marqueece Harris-Dawson (Los Angeles City Council) Attempt To Ban Free Speech https://youtu.be/V_V0eH7mMZw Attached is Judge Dean Pregerson's ruling to L.A. City Council. (Public

Comment/Rules Of Decorum portion starts on Page 29.)