



June 3, 2026

Dear L.A. Housing and Homelessness Committee,

We write to you as the Virgil Square Tenants Association, a group of neighbors in Virgil Square Apartments in Koreatown (CD1) at 411 and 414 S. Virgil Ave, Los Angeles 90020. Our goal is to support each other in improving each other's quality of life and to defend our rights as tenants. As such, we have been organizing for nearly two years to oppose RUBS in our building. Our landlord is Equity Residential, a publicly-traded Real Estate Investment Trust that collects around \$100 million per year in RUBS fees. **Our building is not protected by the Rent Stabilization Ordinance. The City must ban RUBS in all buildings, including those not protected by the RSO.**

Many of us were told during the leasing process that our utility bills would be around \$50 per month. But once we had signed leases and moved in, our RUBS charges were significantly higher: in the \$100-200 range, up to around \$250.

In 2023, our bills started spiking. Were there structural issues, like broken pipes? Was something wrong with the meter? When we individually approached management for an explanation, they refused to provide any transparency. We also asked to see the underlying bills from LADWP and contractors, but the landlord refused. When we reached out to LADWP, they said that they couldn't give the bills to us because we are not the "customer of record."

We were left frustrated and with no answers, paying more and more money with no explanation as to why. In Fall 2024, we began communicating more as neighbors, and we realized that the bills made no sense: sometimes apartments with fewer occupants had higher bills than apartments with more occupants, even when the apartments were the same size. In multiple instances, the landlord was not even applying their own RUBS formula correctly, because they were using incorrect figures for the number of occupants in the apartment.

We began to organize to form a tenants' association, and finally in April 2025, we sent management a letter signed by more than 100 people asking for transparency and to see the underlying bills. We also asked about a common area deduction, because nothing of the kind was mentioned or included in our lease, even though charging tenants for common area utilities usage is often illegal. When management once again refused to provide an adequate explanation or show us the bills, we decided we were not going to pay our RUBS charges until we saw the actual bills. We have the right to know what we are paying for!

In June 2025, we launched a RUBS strike. After two months of being on RUBS strike, the landlord informed us that they had investigated and found that there had been “higher-than-expected” utilities charges, and they refunded us more than \$25,000 collectively. We received credits – but without any calculations or reasoning as to how they determined that figure. Nor did they provide further transparency on how we were being billed.

Each month, we pay our rent but not our RUBS charges. We have now been on RUBS strike for a full year, because Equity Residential still refuses to provide meaningful transparency. Our strike has received coverage in media outlets including L.A. Public Press, Shelterforce, and In These Times.

We know that we absolutely never would have received this money back if we had not organized. No other process – asking the landlord for details, contacting the L.A. Housing Department, contacting LADWP – bore any fruit. **How many other tenants across Los Angeles are being billed fraudulent overcharges with absolutely no accountability?**

Our story shows the many serious problems with RUBS.

1. **The landlord has no incentive to make repairs and address waste, since the tenants – not the landlord – are being billed.**

There have been ongoing serious plumbing issues and water leaks in our building: a large pool leak, burst pipes leaking into the garage, and more. Oftentimes, these leaks flood the apartments on the first floor of the building, causing mold, property damage, and other hazards. Our landlord eventually determined that water was also being wasted via many degraded toilet flappers, and that water theft was occurring from outside the building as well. *They never would have investigated nor found the source of the problem if we had not organized, since we – not they – were absorbing the costs. **This shows the absurdity of landlords’ “conservation” arguments for RUBS.*** Because there is no relationship between a tenant’s utility usage and what they are charged, tenants also are not incentivized to conserve.

2. **Tenants suffer from expensive, unpredictable bills.**

Landlords do not disclose in advance how much tenants’ RUBS charges will be. As tenants, we cannot decide to save money by changing our own behavior, because our usage does not determine how high our bills are – unlike if we had individual meters or submeters in our apartments. If landlords were required to install submeters for each unit, tenants would be able to adjust our usage to reduce our bills. Since tenants have no control over our RUBS charges, we are unable to fairly budget our income each month to pay our bills. This can result in significant financial distress and often, evictions.

3. RUBS can be used as a loophole to illegally increase rent to vulnerable tenants.

In the City of Los Angeles, in buildings like ours which are protected by the Tenant Protection Act but not the Rent Stabilization Ordinance (RSO), landlords can raise the rent up to 10% depending on inflation (currently, 8% in our area). But an increase in RUBS charges can result in tenants' total costs increasing even more than 10%. For example, if a tenant's rent is already raised by 10%, ***a landlord could easily increase the tenant's rental payments by charging RUBS and other junk fees.***

4. RUBS bills depend on factors we have no control over as tenants.

Our RUBS bills can fluctuate a lot depending on the number of vacancies in our buildings, on the contracts that the landlord chooses, and on the behavior of leasing and maintenance staff.

There are extreme transparency and consumer rights issues with RUBS. For these reasons, the Virgil Square Tenants Association demands a ban on RUBS for all RSO and non-RSO buildings. As the City Council claims to fight for affordable housing and a reduction of homelessness, part of that must mean making all aspects of housing affordable. We are willing to pay for utilities that we are actually using, but to do that we would need individual meters or submeters. When there are not individual meters or submeters, the landlord should include the building-wide utilities costs in the rent. Small steps like this go a long way when it comes to affordability.

Sincerely,
Virgil Square Tenants Association

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Bumeal Moore T100

Shanice Moore T100

Joe Porter T108

Aranzazu Ballesteros T117

Jessica Escobedo T121

Elaine Sances T119

~~Michael T.~~ T102

~~Adam~~ T115

~~Robert~~ T104

~~W. H.~~ T105

~~Joe~~ T106

~~W. H. M. Jr.~~ T111

~~Ad~~ T240

Shela Stephens T212

~~David Russell~~ T-209

~~Carl~~ T-211

~~Al~~ T-202

~~AG~~ T201

~~Com~~ T201

~~W~~ T214

<i>[Signature]</i>	T218
Catherine Pimentel	T215
<i>[Signature]</i>	T314
<i>[Signature]</i>	T314
Sara	T220
London Brubaker	T307
Gemma Bush	T218
Michael Baldwin	T223
Chris Patti	T223
Al K	S201
Brenda Harney	T114
Nagendra R. J.	T110
Sarela Sr.	T110
PARSURAM	KAMI T213
Aryan	T304

Missle 312T

Karen Alvarado T317

Brennan Hays T323

Justyn Hampton T315 Justyn Hampton

Augustine Nguyen T303

Amir T223

Malay T223

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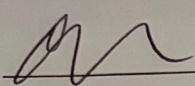
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S205

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S206

~~AK~~

S207

~~E/M~~

S324

~~J. Briggs~~

S310

Elmer	S313
Line th	S320
Juliana	S320
Don	S322
George	S209



Fwd: 22-0178

1 message

Office of the City Clerk <cityclerk@lacity.org>

Tue, Jul 21, 2026 at 5:02 PM

To: City Clerk Council and Public Services <clerk.cps@lacity.org>

----- Forwarded message -----

From: **Virgil Square Tenants Association** <virgilsquareta@gmail.com>

Date: Tue, Jul 21, 2026 at 2:06 PM

Subject: 22-0178

To: <CityClerk@lacity.org>

Hello,

We would like to submit public comment on this matter. We have a PDF letter signed by many people and the file is too big to upload on the website. Since the public comment online portal does not allow smaller files like docx or jpeg files to be uploaded, we are not sure how to fix this problem. Can you please include this and ensure it is part of the public record? Thank you.

- Virgil Square Tenants Association



VSTA Letter on RUBS to City Council Housing & ...