

COURT OF APPEAL OF THE STATE OF CALIFORNIA
FIRST APPELLATE DISTRICT, DIVISION THREE

RAMONA MAYON

Case No. A171913

Plaintiff/Appellant

San Francisco Ct. CGC-24-611907

V.

LONDON BREED et al.,

Defendants/Respondents.

APPELLANT'S REPLY BRIEF

The Honorable Judge Richard B. Ulmer

Ramona Mayon (pro se)
1559 Sloat Blvd. Suite B-175
San Francisco, CA 94132
Phone: 415-595-6308
ramonamayon@yahoo.com

Addressing the Appeals Court is the point of all legal endeavors. I will not waste your time. When one becomes a union representative, by a collection of signatures, it involves more than confronting bosses or alleged landlords, reading rules, solving tiffs, and preventing evictions (not to mention keeping three dogs from euthanasia), it also means developing relationships with multiple press people. I told one last night, “I am singularly proud that 23 people signed a petition to FORM a union in the first damn place, considering how we were inside a chain link fence in middle of nowhere without lights (!!!) being guarded by long-term former prisoners who give a s*** what they say or do to us. The story here isn’t what I am about to write to serious people in a courthouse; the story is how leaders in America’s most progressive city thought it perfectly fine to build an internment camp for vehicle dwellers and the only way out was to give up your RV and move into the Tenderloin.” I would entreat this august panel to take seriously what people complained about on those petitions, whatever name you give us, we *unionized*.

The consequence that two dozen ultra-poor folk had to pay was known ahead of time, and they willingly endured it to get the attention of HUD, not to mention standing in front of the facility numerous times, speaking to the press in plain view of our very hostile Urban Alchemy guards, some of us have lost our rooms and been forced to “shelter” or SROs but yes, we did finally manage to close down the

foul site that is a border zone to a NPL SuperFund site, the water that is Parcel F of Hunters Point Shipyard, which the U.S. Navy agreed in Sept 2024 R.O.D. that it will remediate beginning in 2027. The digging and soil disturbance that was done at the Vehicle Triage Center (VTC) throughout the three years of residency to the clients/guests/residents/tenants/inmates for contracts in excess of \$2,000,000 makes Flint, Michigan look like a toddlers' birthday party. But I'm not a lawyer, so how am I going to say this legally, while striving to maintain relative calm among the inmates? Enter *San Francisco Admin Code 49A*. It was either form a tenants union or file a motion for a writ of habeas corpus.

This \$17,000,000 silo of non-profit money laundering "free services" called a "safe parking" existed for a mere thirty-five RVs out of the 1442 vehicle dwellers in the City & County of San Francisco was made possible by three laws: #1) *California Government Code § 65662* which negated the need to pay any attention to CEQA: "A Low Barrier Navigation Center development is a right by use in areas zoned for mixed use and nonresidential zones permitting multifamily uses". The City certainly broke that rule, as the VTC is located in a heavy industrial zone. #2) *California Civil Code 8698.4* which removed the necessity of any health & safety codes if you can get your local fire department to go along. Also, the people in this so-called "Emergency Housing" can't sue. Now, that's clearly the creation of a second-class of citizens. I think the *Unruh Act* would say different.

To qualify: the definition of an internment camp is where an unpopular group is kept outside the rule of law for an indefinite time. You can see why I contemplated habeas corpus. But there was no way to lay down a record of protest first, so I went with the tenant's union. I don't care what you call us so long as it recognized somewhere, at some point, by judges, that the Respondent ignored ALL the requires of CCC 8698.4 i.e. electricity, fire suppression, and a kitchen for dependent units, which we were because the Urban Alchemy guards extrajudicially took people's propane bottles so they couldn't use stoves (that bit is in the sign-in paperwork) nor have refrigeration as our RV fridges run on propane, no hot water either. They GUTTED our homes. All that replaced it was foul food trays (another non-profit silo) and a single outdoor microwave. It's a violation of the Geneva Convention in times of war (and yes, I do consider this the War on the Ultra-Poors and thus covered by international treaties) to take the "tools of survival" from the citizens. Needless to say I have a highly confrontational film on my YouTube channel (over a thousand films) of me confronting the Fire Marshall about the taking of the people's propane. All the while NO ELECTRICITY while the RULES in *San Francisco Building Code Appendix P* say they must. The fact this was repeatedly reported in the newspaper and no one fixed it speaks to the disdain we live with, as vehicle-dwellers. That brings me to the **third law** that allowed this internment camp to be an acceptable project, their most expensive

homeless solution in fact: *SFPD 97* which makes it a crime to eat or sleep in one's vehicle from 10 pm to 6 am. In 2019, it was amended by the Board of Supervisors to allow for this human trafficking enterprise called "safe parking". Excuse me for using such a harsh word, but what else is it, at \$400 a night per RV with no electricity, no heat, suspect water, in a scary, remote location, guarded by angry ex-prisoners, lied to about "case plan funding" and thus falsely imprisoned, and of course, denied ADA-accessible showers. Socially isolated with a strict no-visitors policy. I have advanced breast cancer and I wasn't allowed visitors for the 31-months there. Constant invasion of seclusion with something they made up called a wellness check, two sometimes three times a day. On-site case managers (a.k.a. Free Services") who lied constantly and openly about our "case plan funding", laughing in our face over it, as well as hiring unqualified labor who damaged our RVs even more. A dystopian hellscape. Then they close it (thank you!), dump 20+ RVs on the street, blacklist us from any services whatsoever unless we give up our RVs, now with tickets piling up, and regular threats by tow by SFPD (all our RVs are unregistered). Five already vanished. There was even a photo op by the new Mayor with "twelve Dept heads", in front of our RVs saying to the camera, "We have to do better, trash and RVs" same breath. This was about five weeks after HE had closed the VTC and knew that thousands of dollars were spent on an unlicensed mechanic.

What opened the floodgates of money to create Camp Dismal was the amendment to *SFPD 97* which referred back to *San Francisco Admin Code Chapter 119*. They broke those rules too. Only operable vehicles, and only for 60 to 90 days. But the one rule that brings me to the closing statement: case managers are to help “transition to non-vehicular housing”. They meant to peel us away from our property from the get-go. That’s why they made the material conditions unbearable. So we’d let go and move into the slums they provide for 30% of our income. An 81-year-old man died out there, March 4, 2024, on the coldest rain we had that year. No electricity. No propane. They never tried to move us on to a proper place to live. Affirmative failure. They stood in the way of repairs and registration so as to move ourselves to a legal RV park. Affirmatively blocking us from a proper housing solution, why? Because we live on wheels. My apologies to this Court for going off-road, which is what I call breaking the evidence rules and all the ways I am supposed to refer back to what I said in court by bringing up everything all at once for a final say. My excuse is medical. I am supposed to be dead in a few weeks, the tumor is about to break through the skin so I am waiting near the hospital for the event, the fight is to stay in my home, to die with comfort and dignity, all the while, these outraged papers I write, are a direct demand that the City stands down and does not tow my RV-home in the meantime. I will die without my home as I face the final stage of cancer. Especially after 30 months

and 21 days in the place they affirmatively placed me, next door to a radioactive shipyard. If you see me camping in front of City Hall in my car, festooned with signs, you'll know they seized my home, in violation of the fourth amendment and *Cal. Veh. Code § 22650(b)*. I intend to take my last breath protesting how a fake agency that is the San Francisco Dept of Homelessness, how they usurped my right to die with dignity in my home *because* I am a vehicle dweller and they absolutely loathe gypsies and won't allow us a place to BE. A rough estimate looking at their grants and so forth, I'm looking at nearly half-a-million dollars spent in my name since putting me in their system Nov 16, 2020.

I filed an administrative claim on Jan 22, 2025 and will proceed to federal court with a proper Sec. 1983 lawsuit as my health allows. The HUD case itself is active and a filed claim. Lots of protections in those laws, you'd think, but alas, not for the invisible minority in America: the Gypsy. Here, today in front of you, I have brought this simple question about whether or not *WIC 8255* really means "tenant" or not (in spite of the legislators writing it 13 times), even for gypsies in "emergency housing". Of course we all know my true motive of going off-road was to show you - and everyone else reading this - what homegrown genocide looks like. Another harsh word the defendant has earned. But to explain, I simply close my Reply with the entire text of a memo from the U.S. State Dept, reminding all that in every article, every conversation, with the City, with HUD, and with the

press, and in my own books and academic papers, I have always asserted my ethnicity as a Traveller, and here it is, the federal government, on October 8, 2020 listing my group as one that has need of protection. I want to be remembered as having introduced the Gypsy Question here to you, today, because really, can they treat us like this, when it's our DNA that demands a different way of living? It's not our fault we live on wheels like our ancestors. It's the cities and the counties fault for not allowing us to be full and equal space and services to everyone else by providing RV parks. RVs belong in RV parks, not on the side of the street.

It's the racism, as defined here:

<https://www.state.gov/defining-anti-roma-racism/>

The Working Definition of Anti-Roma Racism* *adopted on October 8, 2020*

Acknowledging with concern that the neglect of the genocide of the Roma has contributed to the prejudice and discrimination that many Roma** communities still experience today, and accepting our responsibility to counter such forms of racism and discrimination (Articles 4 and 7 of the IHRA 2020 Ministerial Declaration, article 3 of the Stockholm Declaration), the IHRA adopts the following working definition of anti-Roma racism: Anti-Roma racism is a manifestation of individual expressions and acts as well as institutional policies and practices of marginalization, exclusion, physical violence, devaluation of Roma cultures and lifestyles, and hate speech directed at Roma as well as other

individuals and groups perceived, stigmatized, or persecuted during the Nazi era, and still today, as “Gypsies”. This leads to the treatment of Roma as an alleged alien group and associates them with a series of pejorative stereotypes and distorted images that represent a specific form of racism. To guide the IHRA in its work, the following is being recognized: Anti-Roma racism has existed for centuries. It was an essential element in the persecution and annihilation policies against Roma as perpetrated by Nazi Germany, and those fascist and extreme nationalist partners and other collaborators who participated in these crimes. Anti-Roma racism did not start with or end after the Nazi era but continues to be a central element in crimes perpetrated against Roma. In spite of the important work done by the United Nations, the European Union, the Council of Europe, the Organization for Security and Cooperation in Europe, and other international bodies, the stereotypes and prejudices about Roma have not been delegitimize or discredited vigorously enough so that they continue to persist and can be deployed largely unchallenged. Anti-Roma racism is a multi-faceted phenomenon that has widespread social and political acceptance. It is a critical obstacle to the inclusion of Roma in a broader society, and it acts to prevent Roma from enjoying equal rights, opportunities, and gainful social-economic participation. Many examples may be given to illustrate anti-Roma racism. Contemporary manifestations of

anti-Roma racism could, taking into account the overall context, include, but are not limited to:

- Distorting or denying persecution of Roma or the genocide of the Roma.
- Glorifying the genocide of the Roma.
- Inciting, justifying, and perpetrating violence against Roma communities, their property, and individual Roma.
- Forced or coercive sterilizations as well as other physically and psychologically abusive treatment of the Roma.
- Perpetuating and affirming discriminatory stereotypes of and against Roma.
- Blaming Roma, using hate speech, for real or perceived social, political, cultural, economic, and public health problems.
- Stereotyping Roma as persons who engage in criminal behavior.
- Using the term “Gypsy” as a slur.
- Approving or encouraging exclusionary mechanisms directed against Roma on the basis of racially discriminatory assumptions, such as exclusion from regular schools and institutional policies that lead to the segregation of Roma communities.
- Enacting policies without legal basis or establishing the conditions that allow for the arbitrary or discriminatory displacement of Roma communities and individuals.

- Holding Roma collectively responsible for the real or perceived actions of individual members of the Roma communities.
- Spreading hate speech against Roma communities in whatever form, for example in media, including on the internet and on social media networks.

* The United States uses the term anti-Roma racism, as the IHRA working definition recommends that Member Countries use the preferred term in their national context.

** The word ‘Roma’ is used as an umbrella term which includes different related groups, whether sedentary or not, such as Roma, Travellers, Gens du voyage, Resandefolket/De resande, Sinti, Camminanti, Manouches, Kales, Romanichels, Boyash/Rudari, Ashkalis, Egyptiens, Doms, Loms, and Abdal that may be diverse in culture and lifestyles. The present is an explanatory footnote, not a definition of Roma.

Respectfully,

Ramona Mayon

June 3, 2025