



## BOARD OF APPEALS

Date Filed: July 28, 2025

City & County of San Francisco

# REHEARING REQUEST FOR APPEAL NO. 25-021

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**Chandra Laborde, Appellant(s)** seeks a rehearing of **Appeal No. 25-021** which was decided on **July 16, 2025**. This request for rehearing will be considered by the Board of Appeals on Wednesday, **August 20, 2025**, at 5:00 p.m. **and will be held in Room 416 of San Francisco City Hall, 1 Dr. Carlton B. Goodlett Place. The parties may also attend via the Zoom video platform.**

Pursuant to Article V, § 9 of the Rules of the Board of Appeals, the **response** to the written request for rehearing must be submitted by the opposing party and/or Department no later than **10 days from the date of filing, on or before August 7, 2025** and must not exceed six (6) double-spaced pages in length, with unlimited exhibits. The brief shall be double-spaced with a minimum 12-point font size. An electronic copy should be e-mailed to: [boardofappeals@sfgov.org](mailto:boardofappeals@sfgov.org), [julie.lamarre@sfgov.org](mailto:julie.lamarre@sfgov.org), and [kelsangchandra@gmail.com](mailto:kelsangchandra@gmail.com)

You or your representative **MUST** be present at the hearing. It is the general practice of the Board that only up to three minutes of testimony from each side will be allowed. Except in extraordinary cases, and to prevent manifest injustice, the Board may grant a Rehearing Request only upon a showing that new or different material facts or circumstances have arisen, where such facts or circumstances, if known at the time, could have affected the outcome of the original hearing.

Based on the evidence and testimony submitted, the Board will make a decision to either grant or deny your request. Four votes are necessary to grant a rehearing. If your request is denied, a rehearing will not be scheduled and the decision of the Board will become final. If your request is granted, a rehearing will be scheduled, the original decision of the Board will be set aside, and after the rehearing, a second decision will be made. Only one request for rehearing and one rehearing are permitted under the Rules of the Board.

**Requestor or Agent**

**Signature: Via Email**

**Print Name: Chandra Laborde, requestor**

## REQUEST FOR REHEARING

San Francisco Board of Appeals – 111 Taylor Street

Submitted by: Chandra Laborde

Date: July 28, 2025

**Re:** Appeal No. 25-021 — Request for Rehearing of January 28, 2025 Letter of Determination for 111 Taylor Street (Block/Lot 0349/014)

We respectfully request a rehearing of the January 28, 2025 Letter of Determination (“LoD”) for 111 Taylor Street (Record No. 2024-010623ZAD). This request is based on new evidence, significant public interest, and a credible basis to believe that the current operations at the site have intensified in violation of the limitations of its legal nonconforming “Group Housing” status.

### **I. Introduction**

Pursuant to San Francisco Board of Appeals Rules of Procedure and Planning Code § 308.3, we respectfully request a rehearing of the Board’s July 16, 2025 decision upholding the January 28, 2025 Letter of Determination (LoD) for 111 Taylor Street. That LoD erroneously concludes that the current use of the facility by GEO Reentry Services qualifies as legal nonconforming Group Housing under the Planning Code. We request this rehearing on the grounds that:

1. New and material evidence has emerged demonstrating unlawful intensification and misclassification;
2. Significant public interest and harm to vulnerable populations demands reconsideration;
3. The current use is fundamentally incompatible with the Planning Code definition of Group Housing, now or at the time GEO assumed operations; and
4. The lack of regulatory verification or meaningful inspection constitutes a breakdown in administrative due diligence.

## **II. Grounds for Rehearing**

We believe, based on the reasonable knowledge and understanding currently available to us, that it is in the public interest to have a re-hearing based on the following assertions:

- New Evidence of Intensified and Use
- Legal Misclassification of Facility Function
- Oversight Failures and Public Harm

These arguments are supported by substantial documentation and testimony (see attached exhibits), and are discussed in detail below.

## **III. New Evidence of Intensified Use**

The January 2025 LoD confirms that the site is a legal nonconforming Group Housing use, subject to Planning Code §§180-183. These provisions prohibit enlargement or intensification of nonconforming uses. Evidence now before the Board clearly indicates the facility has changed from residential to carceral, and now includes characteristics resembling a correctional or institutional facility, not Group Housing. This qualitative intensification voids any grandfathered status.

### *1. Death of Melvin Bulauan (July 2025)*

Mr. Bulauan, a formerly incarcerated man, died shortly after arriving at 111 Taylor. Family members report he placed calls expressing fear of the facility, stating he would rather return to prison. Staff allegedly refused to conduct a wellness check. This tragedy exposes the lack of medical and mental health capacity at the site and the inherent risks of GEO's custodial model of

“care.” These operations are neither residential in character nor in line with Group Housing standards. [Exhibit A, Exhibit N]

## *2. Overcrowding and Expansion*

Interior images and video recorded during the COVID-19 pandemic show densely packed bunk beds and inadequate circulation space. Testimony confirms residents are routinely doubled in rooms intended for single occupancy. There are no public records of permits for increased occupancy, internal layout modifications, or building code compliance. These conditions indicate physical and operational expansion incompatible with prior LoDs, likely resulting in overcrowding. No DBI reports about bed counts have been found. [Exhibit B]

## *3. Custodial Conditions and Restricted Movement*

A current job posting for a “Part-Time Monitor” at 111 Taylor lists responsibilities including pat-downs, urinalysis, breathalyzers, headcounts and search in personal belongings [Exhibit C]. Furthermore, a 1993 Zoning Administrator Letter explicitly states that restricting freedom of movement disqualifies a property from being considered Group Housing. That principle should apply to 111 Taylor today. [Exhibit D]

## **IV. Legal Misclassification and Facility Function**

GEO Reentry’s evolving corporate identity, opaque contractual language, and use of terms like “Day Reporting Center” or “Parolee Service Center” obscure the reality: 111 Taylor functions as a custodial reentry facility, not housing. [Exhibit E]

### *1. Kitchen Access and Habitability Failures*

Group Housing must include communal kitchens as defined in Planning Code § 102 (minimum one per 15 units; 15% common space [Exhibit F]). GEO's brief states that there are no individual or common kitchen facilities [Exhibit G]. Instead, residents are fed via frozen prison catering and denied access to cooking infrastructure. Testimony confirms unsafe, carceral, and unaccommodating conditions, especially for disabled residents.

### *2. Misrepresentation of Services*

GEO claims to serve "individuals with complex needs," but no oversight, licensing, or verifiable service data has been produced. Zoning classification must be based on observable operations, not internal aspirations. GEO's contract with CDCR refers to "custodial supervision," "intervention monitoring," and "behavioral accountability," all of which exceed a residential model. [Exhibit H]

### *3. Work Furlough Program is Not Group Housing*

Labeling the program as "work furlough" does not exempt GEO from land use compliance. Furlough programs allow carceral restrictions outside of jails—but the use at 111 Taylor, under this label, still imposes custodial obligations inconsistent with Group Housing. This language is used as a loophole to bypass local zoning rules. [Exhibit I]

## **V. Oversight Failure and Public Harm**

The lack of inspection or enforcement over the past 30 years allowed 111 Taylor to operate outside the bounds of its legal use. No final Certificate of Occupancy for residential use has been

located. Complaints filed with DBI, the Fire Department, and Planning allege life safety violations including:

- Testimony of a formerly incarcerated person at 111 Taylor showing harm and negligence.
  - “Maria Richard... banned me from being able to go out for a walk for my mental health... I cut myself 2,500 times in one day because of their actions.” [Exhibit J]
  - “If we did any violations within that house, we were written up and sent back to prison... GEO care is a prison.” [Exhibit J]
- AB32 Loophole - Contract C5612969 was executed post-AB 32, yet authorizes GEO to operate a custodial supervision program that functions as incarceration in all but name. By avoiding classification as a correctional facility, GEO Reentry circumvents AB 32’s prohibition against private carceral operations—exactly the outcome the law intended to prevent.
- An active complaint filed with the Department of Building Inspection (DBI) documents life safety hazards, including blocked egress, unpermitted density, and delinquent compliance with the City’s Sleeping Area Fire Alarm Upgrade, mandated in July 2023. The violation confirms that the facility cannot ensure “unaided exit,” a core presumption of Group Housing. [Exhibit K]
- Zoning Administrator Corey Teague emphasized there’s no category for "correctional use" and confirms the ZA relies on a 1989 permit, despite multiple operational changes since then. “The majority of the concerns... are really focused on the operations... there's really two primary questions here... What is the legal land use? And... is that within the bounds of what is defined as Group Housing...” [Exhibit L]

- Current Surveys: Compton's x Coalition conducted a series of surveys to gather direct input from people held at 111 Taylor on what they have experienced within the facility, detailing carceral environment and conditions, overcrowding and physical conditions, abuse, neglect, inaccessibility, psychological harm and reentry failures. [Exhibit M]

The Board of Appeals has the duty to intervene where there is compelling evidence of unmitigated harm, especially to Black, brown, disabled, trans, and formerly incarcerated people currently confined at this site.

## **VI. Legal Standard for Rehearing**

Under Board Rule § 8, the Board may grant a rehearing when: 1) New material evidence exists; 2) Legal or procedural error occurred; 3) Public interest requires reconsideration. All three apply.

The death of a resident, evidence of custodial intensification, and mounting safety concerns clearly merit a new review.

## **VII. Conclusion**

The January 2025 LoD was based on outdated and incomplete assessments. It failed to consider the actual operations, changes in use, physical expansion, and widespread public concern. The current use of 111 Taylor is not Group Housing, it is a quasi-carceral, institutional program operating without proper permits, safety infrastructure, or zoning alignment. The Board must grant this rehearing to prevent further harm, uphold the Planning Code, and restore public trust.

Respectfully submitted,

Chandra Laborde

## Appendix – Exhibit List

<b>Exhibit</b>	<b>Title</b>	<b>Description</b>
A	Death of Melvin Bulauan	Press and family statements about Mr. Bulauan’s death and denied support
B	Overcrowding Footage	Images/video from COVID-era interior showing bunk beds and layout
C	GEO Job Posting	Part-time Monitor job post listing custodial duties
D	1993 ZA Letter	Prohibits restricted-movement uses from being classified as Group Housing
E	Facility Rebranding and Use Descriptions	GEO program materials describing the site as a “Day Reporting Center,” “Parolee Service Center,” etc.
F	Kitchen Access Failures	Planning Code § 102 definition of Group housing with kitchens percentage
G	Kitchen Access Failures	See page 3 - First 3 pages of Determination Holder Brief
H	CDCR Contract C5612969 <b>July 1, 2025- June 30, 2028</b>	First four pages of contract, stating services required to be given at 111 Taylor
I	Work Furlough Misclassification	January 28, 2025 LoD including “work furlough” label for carceral use inconsistent with Group Housing.
J	Lack of Oversight and Life Safety Violations	Statement from a formerly incarcerated person at 111 Taylor Street describing carceral conditions, harm and negligence.
K	Lack of Oversight and Life Safety Violations	DBI Open Complaint
L	Planning Department Statement on Use Classification	Statement from Corey Teague, Zoning Administrator




M	Survey Report	Report of surveys conducted at 111 Taylor
N	Anjru's Letter	Melvin's son's email showing GEO harm and neglect regarding his father's death

# Exhibit A

NEWS

# SF Supervisor to Probe ICE Contractor After Death of Halfway House Resident



By [Sydney Johnson](#)  Jul 22  [Save Article](#)



The 111 Taylor St. building stands in San Francisco's Tenderloin on July 16, 2025. Activists criticized conditions at the Tenderloin facility, the site of the 1966 Compton's Cafeteria Riot, which is now a halfway house operated by private prison corporation Geo Group. *(Gustavo Hernandez/KQED)*

*Updated 1:10 p.m. Tuesday*

A San Francisco supervisor is demanding a hearing with one of the country's largest private prison corporations after the death of one of its residents at a transitional housing facility in the **Tenderloin**.

Supervisor Bilal Mahmood, who oversees the Tenderloin, will call for the probe into Geo Group at Tuesday's Board of Supervisors meeting. The company, which is also a contractor for Immigration and Customs Enforcement facilities, has come under fire over its facility at 111 Taylor St., which holds a place in LGBTQ history as the site of a 1966 riot for trans rights.

"This company runs ICE detention facilities for the Trump administration across the country," Mahmood told KQED. "If someone is describing a private facility in S.F. as worse than a prison, we want to know what's going on there. ... We want to know how they are operating a facility in our own backyard."

The push comes after Melvin Bulauan was found dead on the street in the Tenderloin on July 14, according to a [GoFundMe organized by his family](#). Before he died, according to his family, he said he would "rather be back in prison" than continue living at 111 Taylor.

The same week, activists spoke out during a San Francisco Board of Appeals hearing to support [efforts to convert the facility into a community center](#) for transgender and other LGBTQ residents.



Supervisor Bilal Mahmood poses for a portrait after a press conference in San Francisco on April 10, 2024. Mahmood, who oversees the Tenderloin, will call for the probe into Geo Group at Tuesday's Board of Supervisors meeting. *(Beth LaBerge/KQED)*

Mahmood said he plans to subpoena representatives from Geo Group and ask about living conditions at the 111 Taylor facility, including reports of civil rights violations. City officials believe it would be the company's first

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The supervisor said his office is also planning to ask about Geo Group's interactions with the federal government in its detention of immigrants amid escalating ICE raids.

After last week's packed, five-hour hearing, the Board of Appeals upheld Geo Group's use of 111 Taylor despite activists' push to use zoning law to oust the private prison corporation.

The building at the corner of Turk and Taylor streets was formerly a diner called Gene Compton's Cafeteria, frequented by women,



queer and trans people. It has become known as a birthplace of transgender resistance after patrons fought back against a police raid at the diner, known as the Compton Cafeteria Riot — three years before a similar riot at Stonewall Inn in New York City.



➡ **San Francisco Mayor Daniel Lurie Is All Over Instagram. Is He Saying Enough?**

Today, 111 Taylor sits at the center of the city's historic Transgender Cultural District.

Geo Group purchased the site in 1989 and has since operated it as a halfway house for people on parole. At the Board of Appeals hearing last week, dozens of speakers described the site as having “prison-like” conditions.

“His death is not an isolated tragedy, but part of a larger pattern of institutional failure,” said Anjru Jazon de Leon, Bulauan's son. “We do not want our father's death to go unnoticed. We are seeking truth, accountability, and allies, especially those willing to speak out about the harmful conditions in and around 111 Taylor St. and help us demand better for families like ours.”

In a press release, the family said that when they contacted Bulauan's parole officer at Geo Group after identifying his body, the officer claimed to have no knowledge that their father had left the facility.



Santana Tapia, with the Not One More Girl campaign and co-founder of Fluid Coffee and Events (center) at the launch of BART's Not One More Girl Campaign. (Maria J. Avila/BART)

“This is about more than reclaiming a sacred space for San Francisco’s trans and queer community; it’s about justice for everyone who has been incarcerated, brutalized and killed by Geo Group,” Santana Tapia, a spokeswoman for the Compton’s x Coalition that sought to turn 111 Taylor into a community center, said in a statement.

Mahmood told KQED that concerns around immigration enforcement have heightened in the Tenderloin, the home of many immigrant families, as ICE raids have escalated in San Francisco. After hearing of Bulauan’s death, Mahmood said he sped up his efforts to find out about the site at 111 Taylor, which he said he had not entered himself.

A date has not been set yet for the hearing with Geo Group, but it will take place this fall.

“It’s heartbreaking to hear what the Bulauan

family has experienced — no child should have to lose a parent under such circumstances,” Mahmood said in a statement. “It takes great courage and strength to turn pain into action.”

*July 22: A previous version of this story said Bulauan’s family spoke out at the same public hearing where activists pushed for converting the 111 Taylor St. facility into a community center. They spoke at a different meeting of the city’s reentry council.*

#### CALIFORNIA NEWS

“Families Are Losing Internet Access as Immigration Sweeps Further the Digital Divide

“MarketInk: KPBS’ loss of \$4.3 million in taxpayer funding means another fundraising campaign

“Stage 5 of the I-5 Rehabilitation Project commences

# KQED

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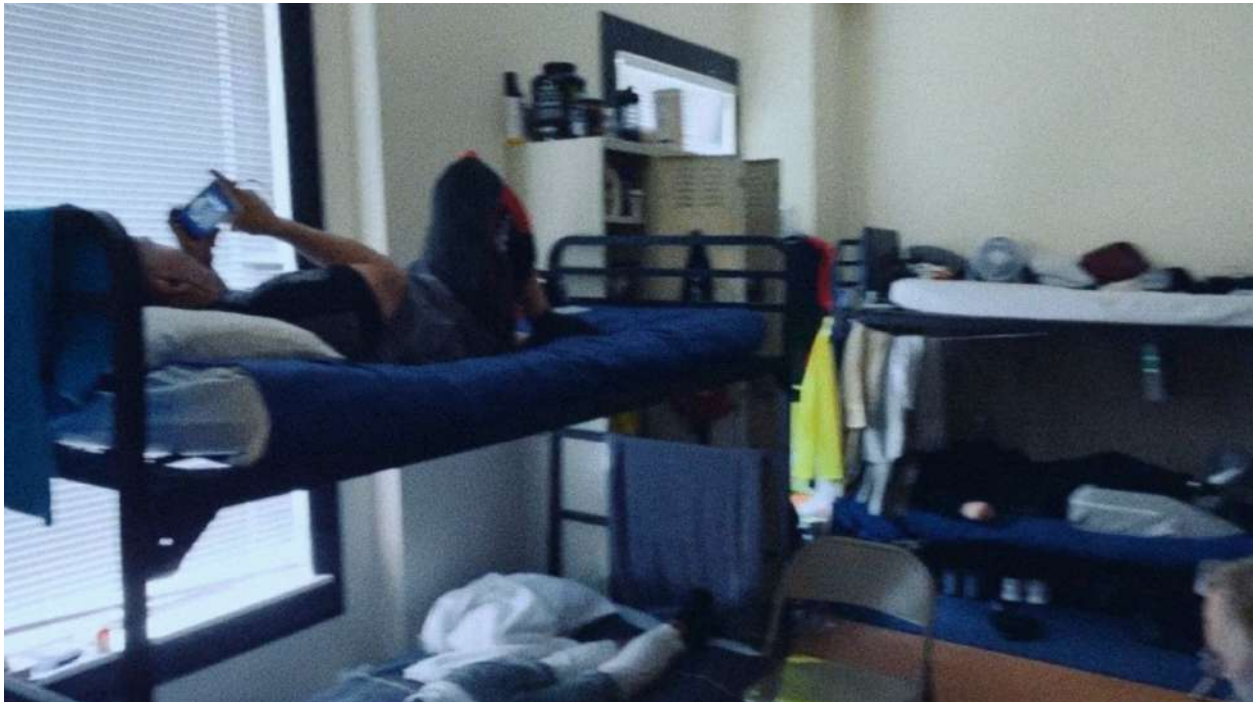
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## Exhibit B

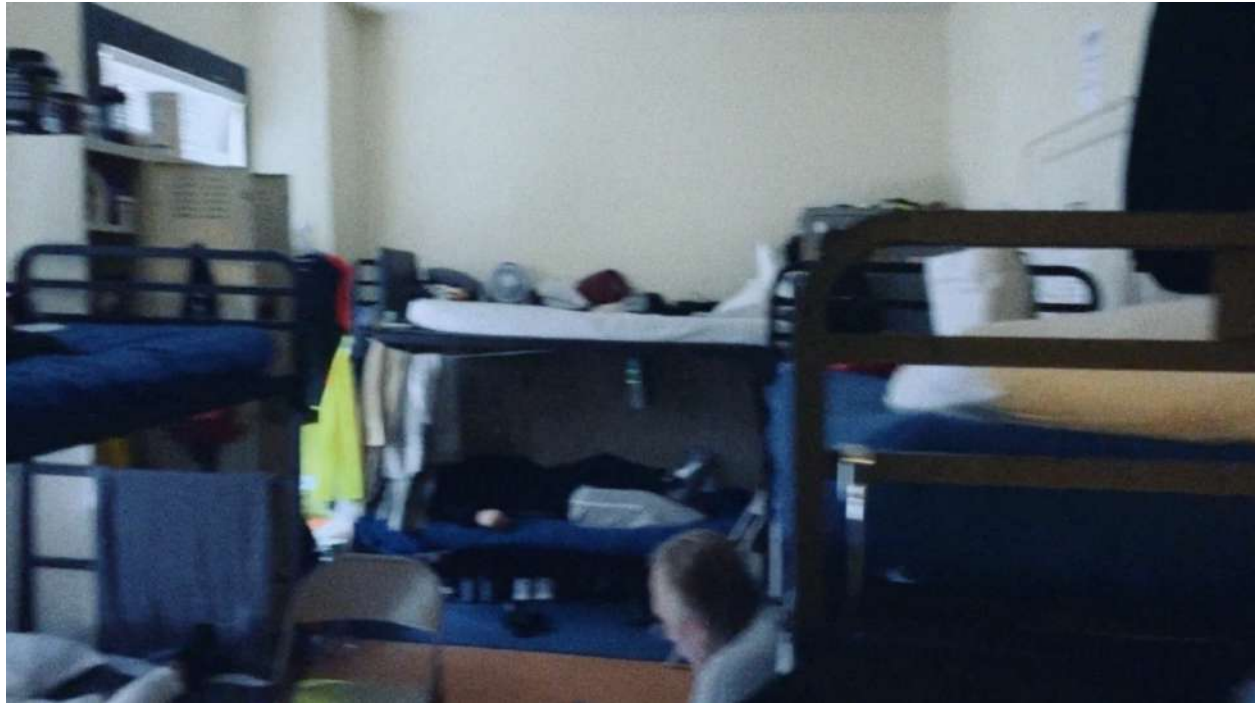
## Exhibit B

Stills from *One Eleven*, inside 111 Taylor during COVID shutdown











## Exhibit C

The GEO Group does not have remote data entry jobs and will never ask an employee/applicant to pay for any type of software to perform their job duties. If you feel that you have been contacted by an individual impersonating a member of GEO's Human Resources Department, please reach out to [recruiting@geogroup.com](mailto:recruiting@geogroup.com)

X

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## SECURITY MONITOR

**Category:** Security**Company:** GEO Reentry Services LLC.**Location:** Taylor Street Center**City:** San Francisco**State:** California**Pay Min:** USD \$24.72/Hr.**H&W:** USD \$4.93

• This position is eligible to receive a Health & Welfare Benefit Rate per hour on all hours paid up to 40 hours per week and not to exceed 2080 hours per year.

**Position Type:** Full-Time

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### Job Description

#### Benefits Information

Full-time employees will enjoy a competitive benefits

package with options for you and your family including:

- Paid Time Off
- Paid Holidays
- 401(k) Matching
- Health Insurance
- Vision Insurance
- Life Insurance



effective services that deliver enhanced quality and improved outcomes.

### **Why Work for GEO:**

We believe that work is more than a place you go to every day. It is about being inspired and motivated to achieve extraordinary things.

Employee benefits play an important role in making The GEO Group a great place to work. At GEO, we believe in the three pillars of employee wellbeing: physical, emotional, and financial. With comprehensive benefits and competitive wages, we trust that you will find all the resources you need here to be successful.

Apply



### **Responsibilities**

#### **Summary**

This position maintains continuous state of alertness and awareness to control and secure the facility and residents. Operates within legal constraints and contract agency stipulations.

#### **Primary Duties and Responsibilities**

Ensures that the equipment necessary for each watch is operational including radios, flashlights, and keys prior to relieving the watch. Prepares shift documentation including shift reports, work orders, security reports, and unusual incidents that are legible, concise and

that meet facility's standards and contracting agency requirements.

Receives necessary information from previous shift personnel pertaining to events that transpired during the shift such as resident medical problems, disciplinary problems, or new arrivals and any special instructions. Relieves the watch and informs necessary personnel that the watch has been relieved. Makes entries into the security log showing the time the watch was relieved noting name and title.

Conducts radio checks documenting results in the security log. Conducts facility counts at the prescribed times and ensures the logbooks in the buildings are accurate as to count.

Frequently patrols building to observe and listen to individual residents and groups of residents and monitors the state of the building. Examples of activities include smelling for marijuana, listening to conversations, or ensuring doors and windows are properly secured.

Ensures that the building picture board has a picture of all residents assigned to the building and that the picture is in the proper bed slot.

Organizes and supervises resident work details to assist in maintaining facility cleanliness to ensure that facility meets facility's and contracting agency requirements.

Performs activities on both a scheduled and random basis including urinalysis testing, pat downs, shakedown, counts, or breath tests, to

maintain control and security of the residents and facility.

Documents disciplinary action for rule violations according to procedure to comply with contracting agency requirements and log accordingly.

Conducts scheduled and impromptu cleanliness checks of the facility and resident's personal belonging to maintain it in an orderly and clean fashion to meet health and environmental requirements. This includes all rooms within the facility and residents' personal belongings.

Welcomes visitors and verifies their identity while maintaining professionalism and courtesy at all times.

Communicates with residents and staff in a professional manner to affirm and enhance self-esteem, dignity, and to maintain positive resident and staff relations.

Participates in staff meetings by sharing observations and recommendations regarding the facility, residents and staff relations to identify and resolve problems and function as a unified team.

Maintains confidentiality obtained through job duties regarding employees, vendors, residents, or outside agencies so that sensitive information is only given on a "need to know" basis.

Complies with company policies and work rules as described in the company Employee Handbook, the Statement of Work, and the

## Exhibit D

## Exhibit D

Testimony April 30, 2025

hi [REDACTED] Thank you So I have a couple of questions about the building uh that used to be the Comptons Cafeteria riot site Um one of them is about the past and one of them is about the future So about the past I understand that And also if there's anything that you feel comfortable about talking about no need to And also if anything is off the record let me know

Okay

Um so basically I understand that you stayed there for a while ago You were there for some time Can you can you share do you remember how how was your experience there um

[REDACTED] I was there because I had to serve three and a half years in prison in federal prison and I was sent to as part of a particular early release program which I was very very fortunate to get in because a lot of times they deny trans people access to um early release programs for various reasons And um so and I was there for one year and that was um part of my early release But um um in the um the BFP um Bureau of Federal Prison they you have to pay um 35 or 45% of your income in order to stay there And it was a much lower price for the state people that were state But um yeah and um I was there and I I I kind of like the inside of the building and it was always my vision for the inside of the building to be apartments and studio apartments And I was just like and the particular room that I had was the very first room at the runk front that faced the streets And I was like "Hey this could be a a a nice size pretty decent size studio apartment for somebody opposed to you know a cell. And um um and um I don't know I just feel like there was a lot of harm happened in that building And I'm a very much a proponent of where um marginalized disenfranchised um discriminated against communities spend long long term in that I feel like that should be turned over to them in a way that feels kind of reparatory reparational type stuff because that was a system that a lot of um people that came out of prison There was quite a number of people that came out of prison opted to go back to prison because of the space and the way they felt like they were treated or not treated or not respected um went back They were willing to go back

C: How long ago would you stay there

[REDACTED] um 20 2012

C: So yeah did you know it was Geo Group?

JJ: I knew it was Geo Group I knew it was Geo Group but you know when the way we got the district the was going after the building We were going after the building We weren't going for a district We were saying this needs to be a redistribution to the community and to

the population that y'all have caused a tremendous amount of amount of harm and disenfranchisement And um

when you tried to reach out to Geo uh I understand they they had a super high price ?

no it was the five year and that's the thing that kind of inspired me because pretty much I don't know who was the board no actually the board of supervisors don't 100% quote me on this but I'm willing to say this on camera but there was a board of supervisor saying there is no way that they're going to you're going to get that building there no I mean community reached out community reach out yeah but the board of supervisors was pretty much like "I'm going to tell you something You're not getting that building" There's still a 5year lease and and they you know there's a lot of money involved in San Francisco having even having that GEO group here in the San Francisco right

C: well we I don't I mean California as a state doesn't want new contracts with private prisons So we are sort of using that as an argument to say like oh Geog Group actually needs to go out but uh I they do use taxpayers money to pay Geo Group Even it's a private prison it uses public funding Yeah So actually that money should be used you know for my community instead. So um but like do you so were you staying in a single room?

I was staying in a room with another transgender person and then when that transgender person left I spent time in a room by in my by myself but I was only in the room with another transgender person

Right Right Right Yeah Because I understand that at least well if if it's I have a it's confusing if in California you you normally you would get in the prison of the gender you identify

Yes

Right So it was not a a male facility

No No Okay No And it was a um actually actually I was housed on the male side of the facility but they uh I was in a separate I didn't share a space a room with the male Okay Yeah I didn't have to share a room with the male

And what about like uh is it is it shared bathrooms

no Oh you have a bathroom probably in other parts of the um It it could have been but I was in a two person room with a bathroom Yes

And shower

Yes

Oh good Yeah Yeah Yeah And then there's a shared space So I I also understand that it's separated by floors but one is for states and then or two is for state and one for federal Ah do you remember that?

██████████ now that you mention it uh they have Yeah Yeah Now that you mention it Yeah

But then there's a space on the corner up in the uh highest uh story that has like a common area. Did you ever spend time there?

██████████: no But um like all the housing is on the second floor on the bottom You know that corner right there That corner with that door I don't know if it still has that door but it doesn't open Yeah Oh yeah Yeah Yeah Um but um you know that is a huge space over there and it's empty No Uh-huh Well I know that that's where a lot of groups and programming happen But I was looking at that That's about maybe 10 one bedroom apartments in there you know Yes San Francisco style The traditional 500 ft<sup>2</sup> one-bedroom apartment that they have here in San Francisco Yes Yes So um so so the ground floor is mostly like admin like management office but there's a part over here that is administered Administrator and there's a part that's downstairs No the basement is where there's groups The basement has groups Yes And there's both sides There's uh the basement is where they have groups The basement Yeah So what kind of

did you use any of the services that they provided or were did they provide any services at all?

██████████ You're required to go to certain groups and it varies from state to federal Um it's always been mentioned that federal is worse than state in terms of the treatment and all that and the and I you could probably hear me being quoted numerous times on the internet Everybody takes their turn kicking your ass when you enter the jails and the prison industrial complex And that is no different And um Geo Care is just like everybody takes their punishment How you you know how you I mean when you're in prison they the um the um mental health person will definitely remind you you're an inmate and you ain't and you don't really have no rights The people that bring the food in if you complain about the food they'll tell you this is pretty much what you deserve because you're in prison What do you expect you know um you know there's a huge lack of respect and especially if you think about returning citizens And to me that is a place that is transitioning people to the outside on the inside they use a lot of language around prisoners and inmates Oh yeah And that is to me that is very dehumanizing Okay And if you're going to return somebody to society you want to return them to back into society as a young man

young woman young gender non-conforming non-binary individual You want to you want to send them back as a human You don't want to send them back and having to like spend two years not being haunted by the prison and the inmate that sometimes people put in your head and put in your spirit and develop have you have other people that are people that are incarcerated calling other people that are incarceration prisoners and inmates and you know you say people that are incarcerated that were in formally incarcerated formerly incarcerated people referencing in currently incarcerated people incarcerated as prisoners

C: Oh yes exactly But the the right the the better way to say would be like so what do you people at at the at 111 do you consider would would they be they're considered still incarcerated?

██████ yes Yeah because how they treat because how GEO group treats Well uh um yes because of the way GEO um it um um the way that the geo care and the counselors and all those people treat you um the way they treat you and there's the the there's guard there's there's guards like I understand people have to go back before specific time Yeah And then like

what what other what other elements are similar to

██████ you have to do a pat down every time you enter the facility You have to do a breathalyzer every time you enter the facility I mean probation officers are often let into the facility So um it's like constantly being policed and having cops Um they look through the your stuff Uh they do um check um they have permission to do that and they do look through your property and and the food is extremely horrible

Oh that's what I heard So basic so there's a a dining room?

Yes

And they cook there

██████ It's awful Yeah No they don't cook there It comes in It comes in on in these um things you know these these things where you have to flip the things and the plates like that the um prison plates And the food is extremely horrible Um a lot of sometimes it's been spoiled There's been times it had maggots in it and that you know you be like "Can't y'all cook a little bit better?" And they're pretty much like "Y'all are in prison." You know like this is what y'all did Y'all are in prison You know with complaining But what people did was you know you have to volunteer x amount of hours and some people would work in the um



C: yes So did you know that the the 111 was a site of a Compton Cafeteria riot site when you were staying there

██████████ i knew that it was the site of the Compton Cafeteria Sometimes I would go because the plaque is right outside on the side I would go there to kind of like inspire myself and lift myself up But like I shared with you sometimes the uh the folks that work there are very much like correctional officers And I always you could hear me quoted many times saying that everybody that works in these facilities they're not correctional officers but they act as correctional officers and they always have to get their punishment out on you as if though the prison the judge sentence you to x amount of years in prison That's a kick in the ass The bailiff is transporting you that's a kick in the ass Is he going to talk call you prisoner inmate look at you like you ain't treat you like they can't trust you Um even in um Geocare the food was horrible and you complain about the food and make suggestions about the food and they um they you know they talk to you and tell you you don't deserve You're you know they'll be like you're an inmate You you're lucky to get this You're lucky you ain't in prison misplaced Why don't you know what I mean and but um there was one day that Oh and there was another thing They did not allow trans people to get on the elevator Like men cannot get on the elevator with women They would not allow trans women to get on the elevator with cisgender women

No way

██████████ Yes And that was one of the things that I chose to rebuttle refute and push back on and um stake my claim as a black trans woman in the city and county of San Francisco It's like you don't get to disrespect me on my turf but also that was a situation where one of the and you want to call them a a correctional officer but they're not a correctional officer They do work for GEO Care And somehow there was a conversation and we were on the side specifically on the Compton side and he was talking to me and he also misgendered me and I was like you will not disrespect me Not not not over here Try that up there over there But not here where you know trans people suffered and struggle and da da da I mean I went the off and I told I told him about I said some very harsh things to him and uh I didn't give a about his feelings I didn't give a about his feelings But I let him know no you're not going to do that here Yes Wait till we get up there and try that Then I might you know you might not get cursed out but you might get some choice words And he was like very much afraid And after that he didn't with me no more And part of it was because of the the bravado that I had It's like because you know sometimes and like I said a lot of people um came to GEO Care I'm telling you a lot of people came to go Care and they went back to prison They were like "Take me back now."

Oh my god

██████████ You know either you can take me back now I'll go and do what I need to do but I'm not staying here You know what I mean

C: and people re would have preferred to serve their time out opposed to being there because it's like was it because of how they were treated by them

it's because of the way they were treated the way that they were talked to and it was just like this the same as Yes And it's kind of scary because you know they overcrowd those systems and it's like the it's like it's just not I'll tell you I went to my therapist and I said that I needed to go I needed to meet with a mental health professional every Monday and every Friday and that's what I needed to do for my sanity That's what I needed to do to cope with being in that space Um because it's really just like prison Mhm It's just like prison

C: So why would people prefer to go back to prison is it was it worse than prison

But um yeah it it's just like prison but the only difference is is like

why would they prefer to go back what

why would you have me come into this space and frustrate me and treat me like and the dope man is right on the corner you know what I mean it's like the con is Yeah Yeah Yeah I can't see how it could be like uh confusing Yeah That's why there's high um there's high relapse rate and that is why when we purchased our building I was mainly trying to make sure that we were in a neighborhood that felt a could feel a little bit more affirming to the community members coming directly out of prison because I had firsthand knowledge from my own personal experience of what does it mean for um people to get out prison and come into an environment such as that and even making the observation that a lot of people coming out don't have family don't have support on the outside So you know there's a great deal of sadness because they see other people getting visitors getting clothing and having people meet them at the facility And you know and on the weekends I don't know if it's still that way but on the weekends your family can come and visit and y'all can occupy space and have dinner and have dinner Huh yeah they have Your family would bring the food Yeah that was the big thing is Yes The food Yeah. And I didn't tell you how we survived and how we ate How because you know certain people had to do certain amount of hours of volunteer hours and people would go to the food kitchens Oh can you imagine paying 35 I think it was 40 35 or 45% of your income And um but people would work volunteer at the um at the food Um the food the dining room Yeah the food dining rooms And they would um in the facility No outside of the like Glide City Teen St Anthony just to be able to access to go out to get food and they would also try you know bring some of the food back in and they would share it with we would all share food Like there was a a food exchange There was a food exchange Yeah And sometimes it's like during that um sometimes you know somebody might have \$5 somebody might have \$8 somebody might have \$20 We would just buy food and eat together because I'm telling you the food was that

deplorable That deplorable You know a lot of times we got um had food with worms or maggots and outdated and it was just like is the dining room in the basement?

it's up in the corner The first floor The first floor.

C: so the last question is about the what is the vision for the site if like once it's liberated what do you think it should be

i think it should be geared towards the trans queer community I know that it should be something that the most marginalized communities should be able to access in a very positive and uplifting and affirming way where there's different wellness and healing modalities Um and even having the basement completely dedicated to wellness and also have full case management and potentially um focusing on the elder and disabled communities Um cuz it's it's a lot it's room for a lot of people Yes I can't remember how many people are housed in

C: Uh it more than 200 I think 245 but there's 105 rooms Yeah Or more I think the contract says up to 300

And I know that I know that at least there could be 50 to 60 probably more studio apartments Not even touching where social service where the case managers and not even touching um on the um on the um the ground floor The ground floor cuz there's a ground floor and there's a basement Yeah

And because contents was at the ground floor in the corner Yeah What do you think we should should happen there oh Comptons want the whole thing Well conting But for the specific place where the where the cafeteria was um or do you think

also permanent housing well you know it could also be permanent housing but it also could be a new and improved version of Compton's cafeteria And one of the reasons why I say that is because you can also create jobs And if we can create jobs and hire people to work the cap cafeteria and bring it and create more jobs in the city for trans people for sustainability in in the future because uh and also if it becomes a um a um like a re-entry like um I like permanent housing Permanent housing Yeah I like permanent housing or you know re-entry for Yeah re-entry Yeah Re-entry But also the cafeteria can prepare meals for the people that live in the building that are seniors and disabled and so forth and so on And um you know also get students from various medical facilities to even put a whole clinic in there so that the residents would have better access to clinics which would cut down the cost of emergency rooms which would um ensure people have better access to their medical care and the medical tech team even sometimes can go up to their units um um you know um just things like that or it could just be a regular apartment building and with um I always think about generating an income through generating jobs for more trans people you know So queer and trans non-binary non-conforming people um you know Um Yeah So that's great And also during the process of some people didn't disagree with us and um getting the district and going after the building and all that and they

people didn't disagree because they felt like specifically mainly the district They were like "You should have went around and asked everybody that is on that block and all the people in the perimeter permission to change this district into a cultural district to change it into a cultural district. But my word is people have built around me and ain't nobody come and knock on our door and ask us you know can they build you know what I mean they didn't exactly ask us if they could build We just protest it You know what I mean yes

Yes Yes Is there anything else about like um either the past or the future or something related with a building that you would that you think

Oh definitely a cultural site Cultural site Culturally a cultural site or a uh a historical site Um a monumental site And the reason why I say that is also they that district should be eligible for cultural dollars I mean that building should be yes eligible for cultural dollars within itself And part of it is because of the harm Yes A lot of harm A lot of harm

Testimony May , 2025

C: well thank you sister Anya for um sharing some time um so first uh well I have three questions um and just share as much as you feel comfortable with okay the first one is about your experience uh when you stayed at 111 if you could just explain a little bit of like how the experience was when when was it and explain a little bit if you know how you know what do you remember um about the time

██████████ yeah when I remember well I arrived there January 6 2016 um late afternoon uh we drove from Solano prison um so that's where I was crawling to that was my first day out and um what was really odd is uh three women were coming out the door that I was going into with strollers i know and I um come to find out that they house federal prisoners there as as well and women are pregnant and they get near to the end of their term they take them over there they have their babies and then after a while they separate the the pair and send the the young woman back to prison oh that was sad yeah that was that was that was horrible but um yeah that was really shock because I didn't expect that and how long there you got to remember huh oh sorry

how long were you there where at GEO

██████████ six six months to the day i made it a point to get out of there as soon as I could um I had to a breathe in a breathalyzer anytime I returned to the building they counted it so in prison you probably heard of a count they walk around and they count everybody uh numerous times a day a couple of these counts during the day are the ones that the whole state will shut down if if you know one prison's off or something like that well they counted us but we were no longer

prisoners the federal um people were still in custody they were considered in custody we were not right and yet they would count us which I don't know how many times you get counted at home um but that was rude because then they would just go into our room at night while we're sleeping and um which wasn't really acceptable to me cuz I you know I already lived through that and I thought I didn't understand why I still had to I mean I understood there were certain things I had to put up with um kind of thing saying I understood it but that wasn't one of them and it was Yeah it was it was very um it was like it seemed like it was meant to remind us you know we're we're just uh a phone call away I guess going back i don't know but my it's also you know everything is so big everything because you got to remember I was in for but just about 23 years so um San Francisco it was January so the all the holiday lights were up and uh so you know when I walked in the mall for the first thing it was just so blingy and bright yeah and so many people on the sidewalks and just so many people colors and a vast amount of colors because I was just used to the what we were wearing what the guards were wearing and the colors of the building that's those colors never changed smells were assaulting whether they were good or not and then of course the tenderloin's got its own version of all the different smells yeah and then then movement a lot of movement I had to get used to yeah it was uh it was really hard on the senses the first few days but jail was I mean you had a getting a line to get into the building a line to get out it was really it it kept us in prison right it kept me in prison yeah i I continue to feel like I wow they're they're really uh they're really extending my experience here you know and they you know it's I imagine that they're get a contract with the city to do this or the county or the state the state do this and I imagine they're offering case management services because they don't really do that and they're Yeah they don't really do anything there services or support

C: there were no services or or any kind of

well they would have they said they would say well you guys can do groups well I just did groups out my ass year in and year out over there and I did own education and you know and got trained in some stuff um you know anybody who did a long time has done a bunch of groups and if you got to the point where you were considered eligible for parole a consideration for parole then you were able to discuss you know because when you go to a prison board they basically have the ability to ask any question from birth till that moment mhm and uh Yeah and your your ability to answer that and be comfortable with it you know determines a lot yeah so

were you staying in the uh single room um

no I had somebody we I was in double room yeah I was um there were small rooms but you know San Francisco everything's small um and did you know that there was so was it a one floor um so four floors the fourth one they pretty much had we were all from the same prison from Solano and we all do the um counseling training program right so he would send us all

there um we could leave and come back we had a certain curfew but I had gotten a job that would get me I I would come in late you know and I'd always stretch and run to the BART and you know make sure I got back in time and it wasn't until I left there and I got in a place at 16 near 16th admission right the first time I walked out 11 o'clock at night on a Saturday night and while there's so many people out in the mission um but it was Yeah GEO was I mean it it had they did a good job of making me still feel like I got some prison here we're not done sorry about that that's That's I didn't notice that they would encourage um because you would get guys that maybe one of the routines that they had in prison was they mob the floor every morning at like in the morning oh and I would guy mop the the the entry floor every day and you know I wouldn't know how to approach him because it's like you're replicating what you've already done yes and you know and I'd feel bad because it's like you're still there your body's you're still doing that stuff and uh you know and Yeah that was tough just seeing seeing how different people reacted to some things yeah although we had our first uh uh the trash shoot caught on fire and so we were evacuated out of the building that was kind of scary oh I've never been in a building that was on fire and but it was I don't know the end of the first month when I realized the um plaque or the um Oh yes other side of Compton's was there and it it kind of kind of made me really wonder why it's what it is now why is it used for a prison thing or some carceral you know some continuing punishment or continuing um surveillance and continuing custody of some sort and uh so I don't I I can't remember when Compton's went out of business um I used to know that but um yeah I think it was in the 70s yeah so it's been quite a long time and uh you know it's you know I did want to speak at that open public comment because you know that's there's the only transgender cultural district in the world and they allowed enough people in government gave the okay say yes we're good with this being designated that and and hold it you know with space and and color the flag the the street signs and the trans flag colors to just you know make people aware just like they have other districts in the city that they do um all over Hunter's Point and they do that one of the African flag colors on some of the poles but you're going to do that then how do you not honor it when there's a historical site attached to this and not only do you not openly recognize it but you don't um in um elevate it mhm you know I mean then it's just then the idea of this cultural district is just window dressing you know it's just saying we have it you know and uh it's a talking point for a politician to you know make himself sound bad it's like that's like folks coming you know coming out of college and working at certain places just to have them on their CV for later you know um really not caring about the work or whatever but just making sure they get that that in there

yeah actually that's one I mean that's great because that was sort of like one of the other questions but what

C: the third question is about like what the build what do you think that once you know the building is liberated what do you think um it should be like what what do you think the vision

██████ I did like I did like the idea of being able to uh um house some trans folks you know we have they've had some initiatives uh with um um housing for trans folks in the city um recently and I think you know having having the the space uh you know like we have the tenderloin museum Mhm right down having maybe something like that so there's an ongoing storefront that kind of uh you know if there's pictures available kind of bring that back to life and you know re you know I've never been to New York but I imagine Stonewall has got to have something uh that that showcases its history and I think that you know because that's um doesn't just inform it educate Mhm you know and it brings us back into you know it's so I feel a responsibility anytime I'm asked to do a drag story hour it's my responsibility say yes because um if we're not doing it here in San Francisco we're letting the rest of the country down you know and there's we have queer folks and trans folks and drag queens in Kentucky that are under harassment and um yeah I I can imagine the sisters that are there in Ohio and what they have to go through i get to walk out of where I live i get to ride my bike in drag to an event here without any worry i don't think that happens in Kentucky and so we have to you know it's incumbent upon us to continue that um you know and and continue you know because when I think about drag story that the great thing about that is it it's funny because I always want to say the kids are you know you're going to harm the kids well no the kids are going to be harmed when your toxicity comes into that picture or you bring a weapon you bring all this aggression but you know what does happen is if any children of any age have any kind of question or just don't seem to fit in whatever box that people thinks they do this allows them to see see some silly cartoon characters go to see we can look like this and go out in public and it's okay yeah and we're still gonna you know talk with you and relate with you and let's have fun and you know what and you could do whatever you want too you know do what you do just don't get any on me or ask maybe I But you know it's it's a way of including people and you know it's always targeted and vilified as as you're going to snatch up our our youth mhm well you know most folks know they're queer in some form or fashion at a younger age than older age maybe it doesn't come to fruition or get spoken or get a lot of thought put into it till later you know because societal pressures and all that but most of the time folks are kind of young yeah you know

C: oh can I ask you something else about like about that because how was how was your experience uh being trans or queer not only like in prison but actually at 111 do you feel comfortable sharing how you navigated that

██████ well I didn't I didn't really So this was still a during my first six months of there it was still nothing that I was going to put out I you know I still had a I'm in the city and I still got to figure all this out so there's a whole lot of stuff and plus part of my journey is while in prison I got to I took the time to kind of take a look at myself and all my past relationships and how horrible they were and and then decide to kind of how was I created yeah and I mean that is uh there's a book uh Robert Kibble from some the Bay Area written maybe 30 years ago and it really did everything for me and it it had me consider heavily socialization when we're growing

up yeah and how this country um just hamstring everybody by um raising people in a in in a misogynistic society everything about our culture in this country is misogynistic everything everything rape culture here every damn thing and I was talking with a friend last night and uh she wasn't really understanding and so I started pointing to things i go somebody uh uh reports a rape and the first thing they ask what you what were you wearing there's a problem there you know yeah there's a problem when I mean the the the pay the pay is you know an easy one but and but but I see how I fell in i see how um so I used to do a workshop because of these what I read and I was getting trained and so I would do a workshop with with guys on how they were socialized and so I'd get them comfortable saying okay men are and then finish this in relationship to women men are well guess what it was never told to me directly but I had the firm belief that men were smarter than never told to me but I felt that somehow so somehow that was that was shown to me in some action or repeated behaviors by other people you know because that's how that happens right if I'm not told directly I'm observing right so you know men are um wow u in in so many ways elevated above women is what my viewpoint was shaped into and I didn't have to like it i grew up in a really violent household my father was uh he would um beat my mother when she was pregnant with me my sister my brother and um he was killed uh when I was three by his brother when he came over to our house and my father was beating on my mom he didn't know his brother did that and um and he beat him into a coma and he died a couple days later and my mother had to um um speak up and say "No this has been going on." And so they didn't charge him and release him but since I'm three years old I'm the oldest that's the last I have any contact with any of that side of my family you know yeah still wow i'm 63 that's been 60 years you know so and I don't get the true information on what happened with my father until I was like 18 oh because now my mother's Filipino mother's Filipino and she was born in Hawaii but she was still that the culture is still very we don't talk about anything do not talk everything's cool and and then you know she got remarried and uh to a a guy that was half white half Mexican but looked very white passing and the the message the untold message was keep your head down don't draw attention to yourself she stopped speaking her language she stopped cooking the food you know I grew up eating white rice every day and now those 50 lb bags of rice are no longer there oh and so she completely assimilated and we weren't given any direct um information about this it was just all and so I see how that contributed how to my socialization and how I was you know grew up and how I was uh how I viewed the world the world is a dangerous place and and um nobody wants me to talk and so I won't talk i didn't talk for a long time oh I really I wasn't mute but I was very I just I wouldn't say [ \_\_ ] to anybody whereas I had my little brother he didn't shut up i i I would envy him and and despise him at the same time because I wish I could have been that bold but being the oldest I always felt responsible for stuff right and uh Right so maybe during when you were in prison you did maybe it it happened like after you were out that you I you identified uh some elements of my childhood that I kind of got to remember um I got out of prison and it kind of rocked me it kind of Yeah it's like my brain didn't ever let me know this until I until I was okay to know it i guess it's kind of hard to explain but once I got got to see parts of my life that I didn't have any memory of it kind of made me sad



and and you know really um just look into myself but it also made me understand certain things that I didn't know I was struggling with like my brother came out when I was 16 and so he was 14 and I remember I didn't have a problem with it but I felt like I'm supposed to know yeah there was I always felt like okay I'm going to have to have I'm supposed to have a certain stance on things that I don't necessarily endorse you know yeah i It's Yeah it's weird and um you know especially you know when you think of in the 60s and stuff and the end of the Vietnam War and stuff like that you I'm real young and I'm seeing this on TV and this is our only information back then tv said it was everything if you wanted to know the world in this little box and I remember the way like the um Black Panthers were portrayed you know they're very you know just the way it was shown on TV really did shape my view because so I didn't really pay attention it seemed like a this is something I should probably not you know probably not good for me to watch without no understanding what you know it's I see how much of the country is encouraged to not think critically of their life their surroundings and the and and the things around them you know just status quo yeah let's go and we hear that in you know in politics and stuff like that and in the argument stuff but it's like not even debates it's not a debate if you just parrot something that makes no sense and you don't understand it it's not a debate it's not it's just you know it's just it's a sheep thing you know but um I so prison allowed me to figure out how I was constructed and so once I understood that I was I made the decision well that's not me mhm and so when I came out and this so this kind of culminates into the when I'm leaving prison and so now I'm in San Francisco and I'm getting to finally grow into whoever I'm going to become but at an age in my 50s Mhm it was weird i you know I knew a lot of stuff in the queer community but it was weird it felt it felt like I was a uh kind not really an intruder just uh want you wanting to belong but yet wanting to be respectful and yet you know it's like wait is there like a did this did the ticket for this show expire i don't get to see it or something it was really odd um luckily my friends I have amazing friends um that understood where you know they kind I was able to um you know no longer be mute and u I was able to say how I felt and you know and so when I did start dressing in femme and openly Um you know having my parents change a little bit um I was surprised to get some positive feedback from guys I had been in prison with and it really shocked me because a couple of them were some Muslim guys that I really was shocked because of how they seem to portray their belief system um but I was I was thankful about that and then uh there's a couple gentlemen that I was really close with that um it wasn't hard it was just it took a little while for them to understand or be okay with it the lack of understanding and um that was okay uh I I became I don't like when I think of GEO uh I never want to go into that building as long as they got it um it's like I've been asked to go back to prison to kind of encourage folks on to do something and you know what there's plenty of people for that there's plenty of people for a lot of this stuff i don't I've been wanting to go it's something I thought of long before going to prison i want to check out Alcatraz Island i bought tickets like four or five times never been over there uh I can't do it i can't do it i get I still get I can ride an elevator but if I'm in a room and I know it's closed or locked and I don't have any way to control that um I that that gets me um kind of triggered and I stiffen and uh get warm and I get really hyper aware um I have a pretty good

handle on my ability to no longer get hyper aware and sensitive of stuff mhm um and I have a pretty good ability to uh you know I I touch it a lot especially as a start putting on the white uh on my face yes it's um the tongue doesn't have any filters and that's okay because all I'm usually saying is what's on my mind anyhow and wrong or right uh once I set it loose we get to talk about it in a humorous way because I can turn it back on myself it doesn't matter i just want it me it's I want to get I think I told you I want to garner people's attention so I can divert it to wherever we're trying to raise awareness or attention to or otherwise it's just a matter of continuing to be able to have some sort of communication with people in any setting whether I'm looking like this whether I'm looking much more the way I'd rather look and or if I'm looking like a a damn cartoon character is a sister i I want to be able to talk to people cuz I spent so much of my life not talking not you know having relationships and not knowing what the hell to do and that's that's screwed to be like wanting to be loved but if you're I don't know what am I supposed to do about it right that's confusing i know now i know now it's it's uh that's why it's kind of weird for me right now because I'm at I'm 63 and I'm I'm fine living on my own mhm but I wouldn't mind i never thought I'd like uh I don't I don't uh I'm not seeking a relationship but I kind of hope I don't miss out you know as all before prison was really bad relationships that were not based in anything good you know and a part of that was misogynistic thinking and some behaviors that were just really screwed up right you know yeah and you know I can't I can't uh correct that so I don't try but what I do is I do remember so I can tap back into that and explain how certain things happen not just for myself but how um like men uh what how they get socialized with boys and what because I I'd love to be able to see uh men get challenged with dialogue on on this but I also know I I it's it's an opinion But I think a pretty good one men are not going to change or consider having these u ongoing communications with self or somebody else if a woman's having that talk with him they're just not because the whole it just goes against the whole socializing part of it it is it's uh No I get the I get the good stuff from here right not from here and it's so And I see it replicated all the time i You know see it you know the first time I dressed head to toe in gender affirming um clothing i was at my place in Ashbury little bitty place

C:was that before or after uh prison

██████████: uh so I I was at uh uh GEO for 6 months 16th admission for six months and then over on Ashbury for the last seven years okay and then I've been here for like Okay but so I get dressed in in this in my little place i'm by myself the front door is not on the street so you got So there's no way nobody could bust in on me the first time I got completely dressed instead of feeling happy or relieved or anything on on the more uh positive side that I would have thought my first thought was fear oh and I remember sitting in that um being challenged because I don't have that direct experience that I'm feeling this fear from it's from all the things I've heard from all my friends right they've been through and what they consider that I don't have to i haven't had to you know when I walk you know we walk through the tenderloin together mhm my walk in the tenderloin is way different than a lot of my friends and they they'll say that they'll they'll say

"Well oh that was way different you know because they didn't get you know verbally accosted or you know didn't have to worry about things you know because I'm 6'3" 270 and you know it really I don't even have to think about it some things aren't going to happen you know and then if I'm lost in thought I I kind of get a a a face that that worries people which is ridiculous but you know

it's funny because um I was working for uh the pit stop on 16th mission yeah baseball it's really Yeah and I started getting um women and trans women would come up and uh do you got a moment so I could talk to you sure and then I'd tell whoever I was working with I'd take a little break i would go across the street get two bananas and two waters and this is before they changed up the plaza and they said "We've got a spot here." And I just water and a banana and I'd have one i said "You don't have to talk." Yeah whatever it is you got 15 minutes nobody is fucking with you right and this became to where this is happening two and three times a week and I was it started well first thing I noticed is okay I'm starting to get loaded up on you know because I was being told about assault uh that was that day or the night before or rape yes and and there was many times I would walk that person over to the women's uh um uh women against rape building on you know the women's building on 18th yes and that's how I got connected for a while um but I never understood how did how did they why did they approach me because kind of look like the guy next to me mhm you know at that time I'm still huge i'm still I'm the same weight I am now but there's no I have no fat on me you know my legs are huge um yeah my one of my neighbors when I was living in Aspbury she would say "I was terrified of you for the first two years." Oh come on honey please you know but I I always wanted to know and but I never asked right what prompted and it is cuz it was probably I was there seven months doing that and I would say I met close to a hundred different women that way wow lot and there was a lot after it got going um I mean there was times when I'd have to I guess it did is something recent and if it wasn't you know can we check in tomorrow or something and because it was starting to it's starting to um I was starting to get a burden that I didn't know what to do with and but I didn't want to I didn't want to turn my back on anybody but I I needed to look after myself a friend of mine helped me understand uh hey I I need to I need to check in with somebody about this so luckily I've got some friends who are clinicians and I was okay doing that instead of going to somebody I didn't know because part of that was finding out and just exploring it together with somebody I knew right you know yeah just what was and uh it it can kind of confuse me but it also there's part of it that made me thankful um because doing outreach um I come across a lot of domestic violence mhm and what I used to think I can have what I used to think but I can't act i can't uh my ego is not my amigo m um uh and I can remember when I'm out there in the street um whenever I come into a situation where there might be a potential for violence or domestic violence that I can't come in with any uh security feeling for the person or anybody I could I could I could bring in you're safe with me in this moment here but I can't you're safe now because I'm here can't do that because when I leave that goes with me yes and I'm a big believer that I can't I I'm not going to bring in something that I

have to take away right because I made their life worse yeah and I had to I had to understand that by going back and into my childhood and trying to remember you know how things were violent and how um people would like put up a front for something knowing it's going to be worse later and so it it's been tricky out on the streets coming coming in these situations that are on like in that moment yeah um I've been I've been in a few where and luckily uh I've always had food yes you know I've had a couple argue where I we got there right when it was going to get really bad and I just barged in between them hey you can get back to this stupidity later have a lunch oh yeah you know and just play it off because I have no problem throwing stuff on myself and getting people's uh um disappointment being upset or anything on me at all and whenever we go out and um because I would tell my co-workers uh somebody says "Well their partner's over there," tell them "Hey have them come over here i want to see him." And make it a thing yeah make it always and I I'll go bring it to her and and whatever you got to do to say the reason why don't be afraid to put something silly on yourself because women may not have a moment in a day many days to let somebody know that they're in their situation right there many times when I never heard the words and it was just just a look and based on that I'm developing a a plan for the next days and weeks and months because none of this stuff resolves fast and just got to find a way to create future space and somehow give hope and not false hope that you know there is somebody is paying attention to them and then I've I've been involved in situations where I've done some in the- moment uh get away kind of stuff and got people back to their families in other states and stuff like that and it's been Yeah it's been uh been tough man i'm sorry it's weird yeah it it's a lot it's easy for me it Somehow I ended up becoming built for this you know um not just where my how I move and all that this body but also where my brain goes okay because my brain makes sure that I'm not acting on any other person's behalf except for the person and and that's not always easy to do because people have a really great capacity to walk into some just horrible danger but I got to be okay with that this is not my life and then you know I've worked with

C: You mean when when when doing outreach in the streets

██████████ or just anything actually so so

C: how long how long have you been doing outreach in the tenderloin?

SA: well I've been doing outreach in San Francisco for years so the first couple years are specific to the tenderloin and mission right and then it's been bandwide and uh you know I've been tasked with trying to find people I've never met you know like women that are pregnant and maybe psychotic um I've been able to find them by not looking um by and it was important for me i'd be out there every day so I was always out always out always out and then um I would I would see people no they're cool they're you know they vet us for other people you know yeah oh my gosh got away from what we're sorry it's been it's been a I No you're incredible but it's it's starting to

it's just starting to take away a little bit um we were I was actually um California Society of Addiction Medicine uh gave us a community service award two years ago oh and uh I didn't even see the email one of the UCSF doctors called me and it was great because then they flew us down to San Diego and we're at the stuff but what's funny is I've went years where I don't think many people in my building that I work in know what I do for the the damn for glide and I've been doing it for a while yeah but you know it's weird because I many times people don't know what the hell I do where I work they work with you from the doctors that I would take was really cool and I found out Cecil Williams won the same award in 1994i was in prison then oh the only other people are like doctors and politicians on this list congratulations yeah that's great i accepted this award in front of like 400 doctors you know that's amazing i'll let him know oh yeah thank you for sharing doesn't mean you know everything right i told him I would battle them on my theories of addiction too because I don't necessarily believe that everything is addiction at all right i challenge not just because of harm reduction is you know I was trained as a substance use counselor um but I don't think everybody has to do the same path too many different too many variations and you know like when we talk about uh everybody talks about doing something to end homelessness you're not going to end homelessness when people are adults that doesn't work like that it's got to be so far upstream right you know yes that's way upstream yeah but um I don't want to uh take too too much time from you so um I'm wondering

C:yeah I mean this is already uh very helpful um conversating now

██████████ I I think I know why my brain went there so talking about what I'm doing is it it kind of makes an understanding on how my name came my sister name came out oh yeah how did it come oh so from all that experience uh

C: cuz you had another name no like uh is it ██████████?

C: also right but now you're using ██████████ right now sister

██████████ no no no ██████████ is just uh how I refer to myself um anyhow oh you know I get my name changed at some point yeah um my mother didn't like it but she's changed her name a few times he's gonna talk to me about So ██████████ is not your sister name no oh okay that was a name that a friend of mine helped me come up with yeah and uh that was partly in in my time just thinking about uh when I first met like ██████████ I met ██████████ like within two weeks of coming to the city i met ██████████ within and I just got another I get a text from every week oh the one like the some kind of like positive message yeah yeah and you know she started ██████████ yes and and and I've been connected with them and I've been connected with St james Infirmary because they used to be in the same building yeah yeah yeah i have a lot of

friends you know it's it saddens me because I had a lot of friends that worked at St James and that's no longer around i know you know my my drag daughter is entrenched in all San Francisco's old stuff and the old drag and stuff like that she was Yeah she came from the east coast and she knew I I could I still know understand how she picked me to be a mother because she just gave me like a peak of some of the best stuff that I missed oh because there's a lot there's a lot of times when I think well I got here too late you know i know i feel that way too so what

C: how did you meet

██████ um ██████ I actually went to ██████ right but you were already you were not living at GEO anymore yeah no I was there it was It was within the first two weeks of in San Francisco oh okay i think I can't remember i think I met Honey cuz we went to uh Aunt Charlie's right around the corner

C: yes that's amazing yeah and Yeah it's pretty cool yeah that's great yeah that's good that's good to know

██████ i mean I worked at for eight years now and uh when I started working there um she still William still had his health and ██████ was still had her health i started going to SF State uhhuh and ██████ used to contact me like once a quarter just to check in on me right you know she was instrumental with bringing the first ethnic studies program you know in the country over there and so I was in the women and gender studies program there so okay it was kind of cool i got like a little bit of some of what's really cool with this city before I left right right you know and then it's just been rough ever since it's tough and I feel like uh I've always I've always felt like this city doesn't like me oh no way yeah unless I'm in drag did I cartoon i'm not a big fan of It's weird oh I'm sure the city likes you anyway I think I might stop it right now um so that I I don't want to take too much time from your I'm already very grateful yeah

C: i mean is it okay if we use some of the quotes um for uh well before you know I I'm I I can use I can share this story in different ways one of them is to use some of the quotes for a projection that we're going to do in October at Compton and then I also I'm writing a piece um about 111 but it's more like academic but it would be it would be published so I I just want to make sure you're okay with me sharing some of these things well thank you let me

██████ No problem yeah let me so. I'm I still get touched and in and seeing what y'all have accomplished oh because remember when you first told me I know me that's like how cool and the other part of me that kind of keeps me around goes oh that's a pipe dream i know and I don't want I don't want to kill it because you know Yeah you told me about showing up at the city hall i I was floored i know and now we have the other the actual appeal for the letter and we we

## Exhibit E



**City and County of San Francisco  
Department of City Planning**

**450 McAllister Street  
San Francisco, CA 94102**

July 8, 1993

Michael Hennessy, Sheriff  
Office of the Sheriff  
City and County of San Francisco  
City Hall, Room 333  
San Francisco, CA 94102

Dear Sheriff Hennessy:

**Re: 111 Taylor Street;  
Lot 3 in Assessor's Block 339;  
Occupancy by Pre-Trial Prisoner  
(Residential Placement) Program  
A Violation of the City Planning Code**

As you know, I have been requested to determine if the use of a portion of the group housing building at 111 Taylor Street by the Sheriffs Office for housing pre-trial prisoners complies with provisions of the City Planning Code applicable to that RC-4/North of Market Residential Special Use district zoned site.

I am sympathetic to the severe problems that your office has in providing adequate jail facilities; however I have concluded that continued use of 111 Taylor Street as a quasi-jail facility is a violation of the City Planning Code. Although your occupancy of the building is clearly a public use, such occupancy is permitted under Section 209.6(a) only if in conformity with the Master Plan. The occupancy is not in conformity with the Master Plan.

As I have previously noted to members of your office, I have found no policies concerning jails in the Public Facilities Element or elsewhere in the Master Plan, but, the Master Plan contains numerous policies requiring the retention of existing housing. Sections 101.1 (b)(2) and (3) of the City Planning Code, two of the eight priority Master Plan Policies that must be met in finding compliance with the zoning regulations of the City Planning Code, provide that existing neighborhood housing and neighborhood character be preserved and enhanced, and that the City's supply of affordable housing be preserved and enhanced. Furthermore, Section 249.5 (b) of the Planning Code states as a purpose of the North Market Residential Special Use District "to protect and enhance important housing resources in an area near downtown." The provisions of that special use district permit dwelling units and group housing units, hotels are prohibited, and residential care facilities providing specialized aid by personnel licensed by the State of California are permitted only if specifically authorized by the City Planning Commission.



July 8, 1993  
Michael Hennessy, Sheriff  
Page 2

Housing units, either dwelling units or group housing units, characteristically provide shelter for persons who reside therein for a month or more, who have the relative freedom to come and go from the site, and who generally utilize social and commercial facilities provided in neighborhood of the housing.

The operation of the Sheriff's pre-trial prison program does not have these significant characteristics. 111 Taylor Street has housing status under the City Planning Code as group housing. Pre-trial prisoner occupancy of 111 Taylor Street has displaced some of these housing units.

In trying to cooperate with your office in finding interim jail facilities, I have attempted to find Master Plan policies that would allow the occupancy of 111 Taylor Street as a temporary, emergency measure. I have not found the existence of such policies, and, your office has not provided me with a definitive commitment to a short term temporary occupancy of 111 Taylor Street. Consequently, I must find the occupancy of 111 Taylor Street by pre-trial prisoners is a violation of the City Planning Code. A public use is permitted in all zoning districts as a principal permitted use or a conditional use depending upon the specific district designation, but only if in conformity with the Master Plan. Conformity with the Master Plans may differ from site to site and district to district.

As I consider the current use of 111 Taylor Street by the Sheriff's office a violation of the City Planning Code, I would like to meet with you or of your designated representatives concerning abatement of the violation. I will be requesting the City Attorney's office to participate in those discussions. I hope a mutually acceptable program for compliance can be achieved quickly.

If you or other interested parties believe that this determination is an error in interpretation of the provisions of the City Planning Code, or an abuse of discretion by the Zoning Administrator, this determination may be appealed to the Board of Permit Appeals within 10 days of the date of this letter.

Sincerely,



Robert W. Passmore  
Assistant Director of  
Planning - Implementation  
(Zoning Administrator)

RWP/alv

cc: Lu Blazej, Director of Planning  
Sydney Unobskey, President, City Planning Commission  
Stephen L. Collier, Tenderloin Housing Clinic & North of Market Coalition  
Kevin Foster, Sheriff's Office  
James F. Harrigan, Sheriff's Office  
Alice Suet Yee Barkley  
Judith Boyajian

## Exhibit F

## Exhibit F

(d) Markets the majority of its merchandise at retail prices.

(e) Such businesses that provide food or drink per subsections (b) and (c) above shall operate with the specified conditions in Section 202.2(a)(1).

(Amended by Ord. [188-15](#); Ord. [129-17](#); see Sec. 102 history note.)

**Gross Floor Area.** See Floor Area, Gross

**Ground Floor.** First Story, as defined under Story, below.

(Added by Ord. [206-19](#); see Sec. 102 history note.)

**Group Housing.** A Residential Use that provides lodging or both meals and lodging, without individual or limited cooking facilities or kitchens, by prearrangement for 30 days or more at a time and intended as Long-Term Housing, in a space not defined by this Code as a Dwelling Unit. Except for Group Housing that also qualifies as Student Housing as defined in this Section 102, 100% Affordable Housing as defined in Planning Code Section 315, or housing operated by an organization with tax-exempt status under 26 United States Code Section 501(c)(3) providing access to the unit in furtherance of its<sup>3</sup> primary mission to provide housing, the residential square footage devoted to Group Housing shall include both common and private space in the following amounts: for every gross square foot of private space (including bedrooms and individual bathrooms), 0.5 gross square feet of common space shall be provided, with at least 15% of the common space devoted to communal kitchens with a minimum of one kitchen for every 15 Group Housing units. Group Housing shall include, but not necessarily be limited to, a Residential Hotel, boardinghouse, guesthouse, rooming house, lodging house, residence club, commune, fraternity or sorority house, monastery, nunnery, convent, or ashram. It shall also include group housing affiliated with and operated by a medical or educational institution, when not located on the same lot as such institution, which shall meet the applicable provisions of Section 304.5 of this Code concerning institutional master plans.

(Amended by Ord. [50-22](#); see Sec. 102 history note.)

**Gym.** A Retail Sales and Service Use including a health club, fitness, gymnasium, or exercise facility when including equipment and space for weight-lifting and cardiovascular activities.

(Amended by Ord. [111-21](#); see Sec. 102 history note.)

## Exhibit G

# Allen Matkins

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Attorneys at Law  
Three Embarcadero Center, 12<sup>th</sup> Floor | San Francisco, CA 94111-4074  
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www.allenmatkins.com

## **I. Introduction & Executive Summary**

The Board of Appeals (“Board”) should deny Appeal 25-021 (“Appeal”) regarding Letter of Determination 2024-010623ZAD issued by the Zoning Administrator (“ZA”) on January 28, 2025 (“2025 LOD”) for 111 Taylor Street (“Property”). The 2025 LOD is routine, proper, and consistent with 20 years of such determinations that categorize the Taylor Street Residential Reentry Center (“Center” or Use”) as “Group Housing.” (*See* Exh. 1, LODs for the Property over two decades.)

The Center has existed and served the same population in the same capacity and at the same intensity for 36 years. (*See* Exh. 2, History and Operations Statements.) The ZA issued the 2025 LOD when GEO Reentry Services, LLC (“GEO”) requested a routine LOD to update its files for its continuing partnership with federal and state government. While the Use has not changed, it became a legal nonconforming use upon the establishment of the Group Housing Special Use District and amendments to the definition of Group Housing in 2022. (*See* Section IV, below; *see also* Exh. 3.) Despite allegations to the contrary, nothing changed about the actual Use of the Property to warrant a change in land use category. (*See* Section III, below, and Exh. 2.) Therefore, the 2025 LOD was correctly issued and the Board must deny the Appeal.

## **II. The Standard of Review Requires Deference to the ZA’s determination.**

The Board’s discretion in this Appeal is delineated by the City Charter section 4.106(c) and San Francisco Planning Code (“SFPC”) section 308.2(e)(2), both of which specify that the Board can overturn a ZA determination *only* if the ZA erred in interpreting the SFPC or abused his discretion. The Board must cite evidence in the record to support its finding(s) of error or abuse of discretion. Appellant has not alleged or provided facts to support a finding that the ZA erred in

interpreting the SFPC or otherwise abused his discretion. In lieu of evidence, Appellant provides speculation, sensationalism, and demands for actions beyond the scope of this Appeal, which is expressly limited to deferential review of the 2025 LOD.<sup>1</sup>

### **III. Factual Summary: The Center Provides Group Housing, as Defined.**

The Appellant makes a variety of misstatements of fact, which we correct briefly below and support with attached statements. Operated by GEO at the Property since 1989, the Center provides housing and transitional services to an average of 200 formerly incarcerated adult individuals at a time as they return to the community. (Exh. 2.) Appellant claims that the Center is private prison; it is not. (*Ibid.*) Moreover, it is not and never has been an I.C.E. facility. (*Ibid.*) Rather, the Center allows individuals to choose voluntarily to build a life outside of prison. This community-based solution provides a safe and secure residential setting as an alternative to custody or as a step down from incarceration with the flexibility to meet the individual risk and needs of each resident. Providing incarcerated individuals with support to reintegrate into the community should be a use that is applauded and supported by the City, particularly its progressive constituents.

The Property sits on a 9,565-square-foot lot in the RC-4 district. As such, it can legally accommodate 272 residents, although currently it houses 197 individuals (contrary to Appellant's unsubstantiated claim of 347 residents). (*See* SFPC Table 209.3; SFPC § 208(b).) Prearrangements are generally made three to six months ahead of placement for stays that average six months to a

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<sup>1</sup> Appellant and associates have filed numerous other baseless complaints, including regarding alleged zoning code and OSHA violations, in other fora, which underscore that this Appeal, which solely concerns use categorization, is not the correct forum for those allegations. Moreover, the Center has passed those inspections without issue. (Exh. 4.)

year. (Exh. 2.) Each bedroom is equipped with a private bathroom but no cooking facilities.<sup>2</sup> (Exh. 2.) Instead, residents receive three catered meals daily that meet their individual dietary requirements (vegan, halal, etc.) while providing a more sanitary environment. (See Exhs. 2, 5.) There is ample common space with 18,252 sf of private space and 14,347 sf of common space. (See Exh. 6.)

The Center prioritizes the health and safety of residents and the public, but does not provide medical staff or healthcare. The Center is staffed all day, every day, to monitor ingress, egress, and provide supervision within the building, as well as to provide reentry services. Current staffing includes the following roles: facility directors; social service coordinator; case managers; employment specialist; monitors; maintenance technicians; and office support specialist. No staff members are licensed as healthcare workers or otherwise since no license is required for the work performed in these roles. Similarly, no operating license is required for the Center's work. All medical services are provided by local clinics, urgent care centers or hospitals. Many residents access substance abuse treatment and mental health services off site. GEO does not contract, pay for, or provide these services, however. (Exh. 2.)

Safety and security have been of increased concern following the Board's decision granting Appellant's jurisdiction request.<sup>3</sup> Since then, emboldened members of Compton's x Coalition, of

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<sup>2</sup> Because they lack cooking facilities, these rooms do not qualify as "dwelling units," defined by the SFPC § 102 as "a room or suite of two or more rooms that is designed for, or is occupied by, one family doing its own cooking therein and having only one kitchen."

<sup>3</sup> In order to exhaust its administrative remedies, GEO incorporates by reference its written and oral arguments from the Jurisdiction Request proceedings. The ZA followed the City's notice procedures that have been in place for years, and there is no evidence that the ZA deviated from the City's longstanding policy and practice regarding providing notice of LODs. While the Board expressed dismay about the fairness of the City's notice policies, this was not an "extraordinary case

## Exhibit H



STATE OF CALIFORNIA - DEPARTMENT OF GENERAL SERVICES

**STANDARD AGREEMENT**

STD 213 (Rev. 04/2020)

AGREEMENT NUMBER

C5612969

PURCHASING AUTHORITY NUMBER (If Applicable)

1. This Agreement is entered into between the Contracting Agency and the Contractor named below:

CONTRACTING AGENCY NAME

CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION

CONTRACTOR NAME

GEO REENTRY, INC.

2. The term of this Agreement is:

START DATE

July 1, 2025

THROUGH END DATE

June 30, 2028

3. The maximum amount of this Agreement is:

\$6,844,011.50 (Six Million, Eight Hundred Forty-Four Thousand, Eleven Dollars and Fifty Cents)

4. The parties agree to comply with the terms and conditions of the following exhibits, which are by this reference made a part of the Agreement.

Exhibits		Title	Pages
	Exhibit A	Scope of Work	36
	Exhibit A-1	Program Location	1
	Exhibit B	Budget Details and Payment Provisions	3
+	Exhibit B-1	Daily Bed Per Diem Rate Sheet	1
-			
+	Exhibit B-2	Non-Expendable Equipment	1
-			
+	Exhibit C *	General Terms and Conditions (GTC 02/2025)	*
-			
+	Exhibit D	Special Terms and Conditions	20
-			
+	Exhibit E	CDCR 2301 PREA Policy Information for Volunteers and Contractors	3
-			
+	Exhibit F	Business Associates Agreement (HIPAA)	15
-			
+	Exhibit G	ARMS Data Sharing Security Agreement	13
-			
+	Exhibit H	Site and Funding Limit Requirements	1
-			
+	Attachment 1	Data Requirements and Reporting Time Frames	8
-			
+	Attachment 2	Parolee Request for Accommodation	2
-			
+	Attachment 3	Background Security Clearance Application	1
-			
+	Attachment 4	No Longer Interested Notification (CDCR 1797)	1
-			
+	Attachment 5	Property Room Inventory Sheet	1
-			

STATE OF CALIFORNIA - DEPARTMENT OF GENERAL SERVICES

**STANDARD AGREEMENT**

STD 213 (Rev. 04/2020)

		AGREEMENT NUMBER	PURCHASING AUTHORITY NUMBER (If Applicable)
		C5612969	
Exhibits	Title		Pages
+ Attachment - 6	Activity Report (CDCR 1502)		2
+ Attachment - 7	Incident Report (CDCR 2284)		1
+ Attachment - 8	Physical Site Visit Evaluation		7
+ Attachment - 9	Monthly Participant Day Invoice		2
+ Attachment - 10	Register of Program Participation		1

Items shown with an asterisk (\*), are hereby incorporated by reference and made part of this agreement as if attached hereto.

These documents can be viewed at <https://www.dgs.ca.gov/OLS/Resources>

IN WITNESS WHEREOF, THIS AGREEMENT HAS BEEN EXECUTED BY THE PARTIES HERETO.

**CONTRACTOR**

CONTRACTOR NAME (if other than an individual, state whether a corporation, partnership, etc.)

GEO REENTRY, INC.

CONTRACTOR BUSINESS ADDRESS	CITY	STATE	ZIP
4955 Technology Way	Boca Raton	FL	33431
PRINTED NAME OF PERSON SIGNING	TITLE		
DERRICK D. SCHOFIELD, Ph.D	VP, Reentry Service		
CONTRACTOR AUTHORIZED SIGNATURE	DATE SIGNED		

**STATE OF CALIFORNIA**

CONTRACTING AGENCY NAME

CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION

CONTRACTING AGENCY ADDRESS	CITY	STATE	ZIP
9838 Old Placerville Road, Suite B-2	Sacramento	CA	95827
PRINTED NAME OF PERSON SIGNING	TITLE		
JAMIE MOSS	Deputy Director, Office of Business Services		
CONTRACTING AGENCY AUTHORIZED SIGNATURE	DATE SIGNED		

CALIFORNIA DEPARTMENT OF GENERAL SERVICES APPROVAL

EXEMPTION (If Applicable)

## **LONG TERM OFFENDER REENTRY RECOVERY PROGRAM**

### **I. INTRODUCTION**

The goal of the Long-Term Offender Reentry Recovery (LTORR) program is to assist participants who have served long term or life sentences with life skills and successful reintegration back into the community. The LTORR is a residential facility that provides supportive services, housing, meals, resources, programming, and supervision in a safe, clean, drug-free environment. The LTORR focuses on a compilation of services that address each participant's assessed needs. Participants shall be offered resources to help achieve goals focusing on stable income, employment, housing stability, and permanent housing.

The Contractor shall provide services in the county(ies) specified on the Exhibit A-1, Program Location. The counties that are identified for possible award are Alameda, Riverside, San Diego, San Francisco, and Los Angeles.

### **II. GENERAL INFORMATION**

The Contractor shall provide the California Department of Corrections and Rehabilitation (CDCR), Division of Rehabilitative Programs (DRP), with LTORR services in accordance with this Agreement and all applicable local, city, county and state statutes, regulations and ordinances.

#### **A. Staff Location and Capacity**

The Contractor's facility shall be located within the required county and shall accommodate up to the total number of participants listed on Exhibit B-1, Daily Bed Per Diem Rate Sheet.

The facility shall be able to serve the following supervised population:

1. Long Term/Life Term individuals granted release from a CDCR institution.
2. Persons on active supervision who have been referred by the Division of Adult Parole Operations (DAPO).
3. Penal Code (PC) Section 290 registrants.
4. Serious and violent offenders (e.g. PC Sections 1192.7 and 667.5).
5. Additional referrals deemed appropriate by DRP.

#### **B. Ownership**

All materials and products resulting from this Agreement will be owned by CDCR.

### **III. BACKGROUND INFORMATION**

The Contractor shall provide CDCR with LTORR services as described in this Agreement and shall follow and adhere to all CDCR's rules and policies, including the California Code of Regulations (CCR), Title 15, Division 3, which can be found at: [Chapter 1. Rules and Regulations of Adult Operations and Programs](#). Department Operations Manual (DOM), and Exhibit B-1, Daily Per Diem Rate Sheet.

The Contractor shall comply with the instructions, terms and conditions provided in Exhibit A, Scope of Work.

### **IV. AGREEMENT SCOPE**

The Contractor's organization shall be defined as the entity identified on the STD 204, Payee Data Record, and shall be directly responsible for the delivery of services.

**H. Participant Grievances, Inmate/Parolee Request for Interview, Item, or Service, and Reasonable Modification or Accommodation Request**

The Contractor shall comply with the CDCR grievance procedures as outlined in Title 15, DOM, and department policy.

**I. Offsite Community Service Work**

All offsite community service work shall be approved in advance by the AOR and/or Program Parole Agent (or designee) to ensure that public safety issues are thoroughly addressed and the proposed work site and working conditions present no unreasonable safety risk to participants. All offsite community service work shall be for public agencies or private non-profit agencies and shall be work that would not otherwise be performed by paid public or contracted employees.

**VIII. SERVICE DELIVERY COMPONENTS**

**A. During the contract term, the Contractor shall have:**

1. A valid Lease Agreement or Intent to Lease Agreement, or proof of ownership;
2. An approved Conditional Use Permit (CUP) from a local government agency, or;
  - a) A zoning letter from the municipality identifying zoning requirements, or;
  - b) Documentation indicating the facility's proposed use is allowable under local jurisdiction.
3. Insurance coverage for compliance to contract and state requirements including vehicles (if direct transportation is provided to Participants.)
4. All lease agreement terms/specifications, including facility, vehicles, etc.
5. Such documentation shall be provided to DRP within thirty (30) calendar days of agreement execution, and within thirty (30) calendar days of any revisions. CDCR will determine the adequacy of these documents.

**B. The Contractor shall provide a valid Fire Safety Inspection Request verifying the facility conforms to all life and safety requirements. The maximum occupancy stated shall match or exceed the CUP occupancy.**

**C. The Contractor shall provide a plan for the transportation of participants. Transportation for participants shall be provided through public or private means, with public transportation within 0.5 miles of the facility. The Contractor shall not provide monetary funds for transportation purposes.**

**D. The facility shall be furnished with suitable equipment and furnishings to operate the LTORR.**

**E. The Contractor shall provide a drug-free environment and conduct random breathalyzer and urinalysis testing for participants.**

**F. The Contractor shall provide services that are responsive to participant needs by offering a structured environment, facilitating peer-driven support, addressing reintegration challenges, and linking participants to community resources. Specific issues to be addressed include adapting to technological changes, developing pro-social networks, managing family dynamics, and dealing with the stigma of incarceration and crime.**

Additionally, the Contractor shall offer services such as:

1. Trauma-informed care to address the psychological impact of long-term incarceration.
2. Financial literacy programs to help manage personal finances and budgeting.
3. Legal aid for navigating post-incarceration legal challenges.
4. Health and wellness programs focusing on both physical and mental health.

5. Services to facilitate smoother family reunifications.
  6. Digital literacy training to help participants become proficient with modern technology and online services.
  7. Vocational training and educational programs to enhance employability and career prospects.
- G.** Participants shall not be subject to any “blackout” periods or similar practices (e.g., restricting community leave passes, phone access, or visits) during program intake or orientation. If a participant violates a rule during this period, the Contractor shall adhere to their program protocols to address the violation.
- H.** The Contractor must use an evidence-based assessment tool to determine the participant’s specific program needs and assist in developing the Case Management Plan (CMP), known as the secondary assessment. The tool should be comparable to evidence-based assessments used in institutional settings (e.g., Texas Christian University [TCU], or equivalent). The assessment tool must be submitted to DRP within thirty (30) days of the Executed Agreement. The Contractor shall be trained in the implementation, interpretation, and administration of the approved secondary assessment tool. Staff must understand the assessment results and their significance in developing the CMP.
- I.** The Contractor shall provide DRP with electronic copies of all curricula for approval prior to use.
- J.** The Contractor shall develop a network of resources, including DRP programs, to support participants’ progress toward community reintegration, sustainable permanent housing, and healthy living through healthcare partnerships. These resources may include mental health services, application assistance for healthcare coverage, housing assistance, community service activities, employment services, and work wardrobe.
- K.** The Contractor shall communicate and work collaboratively with DRP for implementation support and maintain regular communication with the AOR and participants.
- L.** Incident reporting protocols, as provided by the CDCR, shall be followed.
- M. Multiple Program Guidelines**  
The Contractor shall obtain written approval from DAPO prior to co-mingling populations (e.g. county, city, federal, private entity programs, etc.) in any facility. Once DAPO’s approval is received, the Contractor shall obtain approval from the DRP. The CDCR reserves the right to request a detailed cost allocation plan of all programs operating at the Program site and to review the criminal history of non-LTORR participants residing in the facility.

Participants shall be housed in a single facility and the Contractor shall ensure the facility operates within the guidelines of this Agreement. Contractors having more than one (1) program at the facility shall ensure sufficient physical and operational barriers, so LTORR participants do not co-mingle with participants from other programs. LTORR participants shall receive equal standard of living conditions as non-LTORR participants. Participants shall not share sleeping areas, programming schedules, or dining times with non-LTORR participants, unless approved by the CDCR.

- N. Program Eligibility**  
Individuals on active parole supervision who have served long term or life sentences are eligible for programming services available through LTORR; however, the CDCR shall have the final decision

# Exhibit I



## LETTER OF DETERMINATION

January 28, 2025

Maria Richard  
111 Taylor St.  
San Francisco, CA 94102

Record No.: **2024-010623ZAD**  
Site Address: **111 Taylor Street**  
Assessor's Block/Lot: 0339/003  
Zoning District: RC-4 (Residential- Commercial, High Density)  
Group Housing SUD  
Priority Equity Geographies SUD  
North of Market Residential 1 SUD  
Fringe Financial Service RUD  
Staff Contact: Kat Yi –[kathryn.yi@sfgov.org](mailto:kathryn.yi@sfgov.org)

Dear Maria Richard:

This letter is in response to your request for a Letter of Determination regarding the property at 111 Taylor Street. You previously requested and received a written determination for this property on March 16, 2022. In that letter, you requested a land use determination regarding a work furlough program sponsored by the Federal and State governments, which was determined to be a Group Housing use per Planning Code Section 102.

The site is still used for a **work furlough program** sponsored by both Federal and State government contracts. As such, the legal residential use for this property continues to be Group Housing. Group Housing is a principally permitted use in the RC-4 Zoning District, with a permitted density of up to one bedroom for every 70 square feet of lot area.

The Group Housing Special Use District (SUD) became effective on August 21, 2022, and prohibits Group Housing uses except those that are an Affordable Housing Project, as defined in Planning Code section 315(b), or those that are Single Room Occupancy residential hotel units required by section 41.13 of the Hotel Conversion Ordinance, Administrative Code section 41.13. The existing Group Housing use at the subject property does not meet either of those exceptions, and is therefore a legal nonconforming Group Housing use. Pursuant to Planning Code Sections 180-183, a nonconforming use may not be enlarged or intensified, but may continue to operate as authorized unless it is abandoned or discontinued.

Therefore, based on the information above, it is my determination that the legal use of the subject property is legal noncomplying Group Housing.

**Please note that a Letter of Determination is a determination regarding the classification of uses and interpretation and applicability of the provisions of the Planning Code. This Letter of Determination is not a permit to commence any work or change occupancy. Permits from appropriate Departments must be secured before work is started or occupancy is changed.**

**APPEAL:** An appeal may be filed with the Board of Appeals within 30 days of the date of this letter if you believe this determination represents an error in interpretation of the Planning Code or abuse in discretion by the Zoning Administrator. Please contact the Board of Appeals in person at 49 South Van Ness Ave, Suite 1475, call (628) 652-1150, or visit [www.sfgov.org/bdappeal](http://www.sfgov.org/bdappeal).

Sincerely,

A handwritten signature in black ink, appearing to read "Corey A. Teague".

Corey A. Teague, AICP  
Zoning Administrator



## Exhibit J

## Exhibit J

it would appear contrary to those values to have a major private prison corporation with contracts with ICE situated in a neighborhood that is home to one of the largest immigrant populations."

**Janetta Johnson (Transgender Cultural District founder):**

"I also spent one year in GEO care... if we did any violations within that house we were written up and sent back to prison... GEO care is a prison. It is an institution where they are housing people that are considered... inmates."

**Former Resident Steve Miller:**

"I actually just left GEO in March... Maria Richard... banned me from being able to go out for a walk for my mental health. They also control most medications... I cut myself 2500 times in one day because of their actions."

**Dale Seymour (neighbor):**

"In the last 35 years I've lived... within 100ft of their front door... We got people that have life like murderers had life sentences now have their own homes coming through the programs like 111."

**Building Department Investigation**

**Senior Building Inspector Joseph Ospital** confirmed complaints were filed:

- May 2nd, 2025: Elevator issue (closed May 5th)
- May 12th, 2025: Two duplicate complaints referred to Planning
- Earlier complaint: October 4th, 2022 (closed October 21st, 2022)

**Board Deliberations & Decision****Commissioner Swig's Position:**

"This is not a referendum on the issue of trans housing and rights... This is not a referendum on the GEO Group... This is not a referendum on the historical significance of Compton's... There is a time there is a place this is not the body to do it... We're not a policy body. The policy body is the Board of Supervisors."

**Vice President Eppler's Dissent:**

# Exhibit K

COMPLAINT DATA SHEET

**Complaint Number:** 202540709  
**Owner/Agent:** OWNER DATA SUPPRESSED  
**Owner's Phone:** --  
**Contact Name:** --  
**Contact Phone:** --  
**Complainant:** COMPLAINANT DATA SUPPRESSED

**Date Filed:**  
**Location:** 111 TAYLOR ST  
**Block:** 0339  
**Lot:** 003  
**Site:**  
**Rating:**  
**Occupancy Code:**  
**Received By:** JTRAN  
**Division:** BID

**Complainant's Phone:**  
**Complaint Source:** WEB FORM  
**Assigned to Division:** BID

**Description:** date last observed: 24-JUL-25; time last observed: 12pm; identity of person performing the work: Maria Richard, GEO Group; exact location: Main Bldg; building type: Other FIRE SAFETY/FIRE ESCAPE; MOLD; ILLEGAL CHANGE OF USE; DISABLED ACC: ENTRANCE; ; additional information: I am submitting a formal complaint regarding multiple serious and ongoing code violations at 111 Taylor Street, a privately operated reentry facility owned and/or operated by GEO Reentry Services, Inc. The following conditions, as documented by firsthand experience, community interviews, and public records, present urgent life safety risks and warrant immediate investigation and enforcement. 1. Fire Safety and Egress Violations: Residents are routinely locked in past curfew and prevented from egressing the building. Staff control all doors electronically and require manual override to unlock them. In the event of a fire, this obstructs self-preservation and directly violates SF Building Code egre

Instructions:

INSPECTOR CURRENTLY ASSIGNED

DIVISION	INSPECTOR	ID	DISTRICT	PRIORITY
BID	LARA ARAIZA	6385	10	

REFERRAL INFORMATION

COMPLAINT STATUS AND COMMENTS

DATE	TYPE	INSPECTOR	STATUS	COMMENT	UPDATED BY	DIV
07/25/25	CASE OPENED	Lara Araiza	CASE RECEIVED		Jackie Tran 25-JUL-25	INS
07/25/25	OTHER BLDG/HOUSING VIOLATION	Lara Araiza	CASE CLOSED	Duplicate of 202537538 case closed per JG-jt	Jackie Tran 25-JUL-25	INS

COMPLAINT ACTION BY DIVISION

NOV (HIS):

NOV (BID):

Inspector Contact Information

[Online Permit and Complaint Tracking](#) home page.

Technical Support for Online Services

If you need help or have a question about this service, please visit our FAQ area.

# Exhibit L

## Exhibit L

**Legal Use Determination:**

"The majority of the concerns that have been raised are really focused on the operations of the facility and the operator... there's really two primary questions here one which is what is the legal use of this property regardless of operator, just what is the legal land use? And secondly, like how is it currently being operated and is that within the bounds of what is defined as Group Housing in the planning code."

**Administrative Record:**

"There was a very clear building permit in 1989 to establish the Group Housing use. There was a notice of special restrictions recorded on the property that this is Group Housing use has been used in this very similar manner since that time. There have been ten prior letters of determination from other Zoning Administrators in the past that are essentially similar to this."

**Group Housing vs. Residential Care Facility:**

"Group Housing is a housing use. It is a residential use. The purpose of it is the living part... We basically have two residential uses. We have dwelling units which are individual units... And then you have Group Housing which is this big catchall for larger facilities that are not dwelling units. Residential Care is important. That residential is kind of describing the primary use which is the care people are there because they need licensed medical care... it is defined very clearly as an institutional use."

**On Licensed Medical Care Distinction:**

"So for Group Housing the facility itself if it's not providing licensed medical care right it's just going to be Group Housing... Where a Residential Care facility is... there's very specific licensed medical care nursing staff who are onsite essentially 24 seven because the residents who live there are in need of that specific medical care."

**Enforcement Process:**

"We did receive complaints... We do have an open enforcement case that is currently under investigation and we did have two staff members do a full site visit and tour the entire building last month. We have requested information and documents... from the operators and the owners and that process is ongoing."

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## **BUILDING DEPARTMENT TESTIMONY**

### **Senior Building Inspector Joseph Ospital (via Zoom)**

**Complaint History:**

- **May 2nd, 2025:** Elevator out of service complaint (closed May 5th, 2025)
- **May 12th, 2025:** Two duplicate complaints referred to Planning Department
- **October 4th, 2022:** Previous complaint (closed October 21st, 2022)

**President Trasviña's Conclusion:**

"I think we can conclude that at the time the matter was before the Zoning Administrator there were not any pending complaints but after... while that the matter has been before us after our granting of jurisdiction, the building has attracted some complaints and some of

# Exhibit M

# Report on Lived Experiences at 111 Taylor Street

## 1. Carceral Environment and Conditions

Respondents overwhelmingly described the facility as operating like a prison or detention center, not a reentry housing program. This perception is reinforced by:

- Enforced headcounts, curfews, pat-downs, and lockdowns mimicking incarceration protocols.
- Chore lists enforced under threat of punishment, making the space feel punitive rather than rehabilitative.
- Surveillance culture, including cameras and strict movement controls.

## 2. Overcrowding and Physical Conditions

Residents reported:

- 3+ individuals per room, with many citing bunk beds and minimal personal space.
- Elevator outages, mold, and unsanitary bathrooms were commonly experienced.
- Bathrooms frequently lack hot water, privacy, and cleanliness.
- The building was consistently described as overcrowded, particularly in shared spaces like the lobby and dining area.
  - Drug sales from employees to residents
  - Sex work from employees to residents
  - Extortion of funds- workers using geo money to buy scooters and electronics to resell on the streets
  - Mail theft

## 3. Abuse, Neglect, and Inaccessibility

Both surveys and interviews detail:

- Neglect of mental health needs and dismissive or abusive responses to distress (e.g., calls for help ignored).



- Inadequate care for disabled individuals, with no accessible bathrooms or accommodations.
- Allegations of food contamination (including maggots), abuse by staff, and lack of medical attention.
- Conditions described as inhumane and retraumatizing, especially for those previously incarcerated.

#### **4. Psychological Harm and Reentry Failures**

- Multiple respondents expressed that they felt safer in jail than at 111 Taylor.
- Experiences included feelings of fear, surveillance, and helplessness.
- No real transition support—respondents shared that “reentry” was in name only.

#### **5. Aspirations for the Future of 111 Taylor**

Despite deep harm, many expressed hope for transformation:

- A desire for the building to become a community-run space offering housing, healing, and services centered on trans, immigrant, and disabled communities.
- Recommendations included establishing a co-op model, a trans cultural center, and a space for formerly incarcerated people to lead programming and decision-making.

#### **6. Community Support and Advocacy**

- Respondents expressed willingness to share their stories publicly, both anonymously and on record, to support accountability.
- They support the site becoming a community-led space focused on dignity, healing, and cultural reclamation.

# Exhibit N

**From:** ComptonsxCoalition [comptonsxcoalition@gmail.com](mailto:comptonsxcoalition@gmail.com)  
**Subject:** Fwd: Form Submission - Contact Form - Seeking Accountability and Allies – Death of Our Father After Placement at 111 Taylor Street  
**Date:** July 28, 2025 at 3:04 PM  
**To:** TurkxTaylor Admin [admin@turkxtaylor.net](mailto:admin@turkxtaylor.net)

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

From: **Squarespace** <[form-submission@squarespace.info](mailto:form-submission@squarespace.info)>

Date: Fri, Jul 18, 2025 at 9:03 PM

Subject: Form Submission - Contact Form - Seeking Accountability and Allies – Death of Our Father After Placement at 111 Taylor Street

To: <[comptonsxcoalition@gmail.com](mailto:comptonsxcoalition@gmail.com)>

Sent via form submission from [Liberate Compton's. Remove GEO Group.](#)

**Name:** Anjru Jaezon de Leon

**Email:** [anjrujaezon@gmail.com](mailto:anjrujaezon@gmail.com)

**Subject:** Seeking Accountability and Allies – Death of Our Father After Placement at 111 Taylor Street

**Message:** Good evening,

My name is Anjru Jaezon de Leon. I'm writing alongside my sisters, Micare, Annika, and Milana, to share the devastating news that our father, Melvin Bulauan, passed away five days ago, on July 14, 2025, his birthday.

Just days before his death, our father was transferred from a state mental health facility in Atascadero to 111 Taylor Street in San Francisco. In the final hours of his life on July 13th, he made multiple calls to us in visible distress. He told our grandmother, my sister Micare, and me that he felt overwhelmed with fear and anxiety in the facility. He even said he would rather return to jail than remain at 111 Taylor. I called the 111 Taylor facility three times, begging for a wellness check. They hung up on me three times before I was able to complete a sentence.

That morning, our father was found deceased near 225 Taylor Street, just one block from the facility.

In our search for answers, we came across The Adachi Project's documentary on 111 Taylor Street. What we saw in that film raised serious concerns about the for-profit nature of the facility, the lack of oversight, and the systemic neglect of those sent there.

As former foster youth, we spent our lives watching our dad cycle through incarceration and untreated addiction in this city. We know he is one of many. His death is not an isolated tragedy, but part of a larger pattern of institutional failure.

We are reaching out because we do not want our father's death to go unnoticed. We are seeking truth, accountability, and allies, especially those willing to speak out about the harmful conditions in and around 111 Taylor Street and help us demand better for families like ours.

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## BRIEF SUBMITTED BY THE DETERMINATION HOLDER

## **I. Introduction & Executive Summary**

The Board of Appeals (“Board”) should deny the Rehearing Request (“Request”) of Appeal No. 25-021 (“Appeal”). On July 16, 2025, following a five-hour hearing, the Board rightfully upheld Letter of Determination 2024-010623ZAD issued by the Zoning Administrator (“ZA”) on January 28, 2025 (“2025 LOD”) for 111 Taylor Street (“Property” or “Center”).

The Request entirely lacks merit, relying on a nonexistent section of the San Francisco Planning Code and a fabricated legal standard. (Request, pp. 1, 6.) Requestor’s 74-page submission fails to state, let alone meet, the correct standard for rehearings. (*See* Rules of the Board of Appeals [“Rules”], Article V, Section 9(b).) The Request abuses the appeals process and wastes time, money, and other limited City resources. For the reasons set forth below, the Board should deny the Request.

## **II. The Board’s Rules Set a High Standard for Rehearing, Which Requestor Misstates**

While neither the City Charter nor the San Francisco Planning Code authorizes a rehearing before the Board concerning a LOD, the Board’s Rules provide a procedure and standard for handling Rehearing Requests:

Except in extraordinary cases, and to prevent manifest injustice, the Board may grant a Rehearing Request only upon a showing that new or different material facts or circumstances have arisen, where such facts or circumstances, if known at the time, could have affected the outcome of the original hearing.

(Rules, Article V, Section 9(b), emphasis added.) The Rules mandate that a successful written request include: (i) the nature and character of the new facts or circumstances; (ii) names of witnesses and/or

a description of documents to be produced; and (iii) reason(s) the evidence was not produced at the original hearing. (*Ibid.*) The Rules further provide: “Failure to exercise due diligence to produce the new facts and circumstances at the previous hearing shall be deemed grounds for denial of the request.” (*Ibid.*)

Requestor utterly fails to meet any of the requirements above, and instead fabricates the standards for a rehearing. She purports to make the Request pursuant to the Rules and “Planning Code § 308.3” which does not exist. (Request, p. 1.) She then cites “Board Rule § 8,” under which the Board may grant a rehearing when: 1) New material evidence exists; 2) Legal or procedural error occurred; 3) Public interest requires reconsideration.” (Request, p. 6.) This rule does not exist either, and this fictional standard appears throughout the Request. For this failure to cite—let alone meet—the requirements for a rehearing, the Board should deny the Request.

### **III. The Request Does Not Meet the Board’s Standard for Rehearing**

#### **A. Nothing Has Changed at 111 Taylor Street**

Applying the actual standard for a Rehearing request, it is obvious that no “new or different material facts or circumstances have arisen” concerning the legal land use at the Property between the July 16 hearing and the submission of this response. (Board Rules, Article V, Section 9(b).) As previously briefed and established, the Center has existed and served the same population in the same capacity and at the same intensity for 36 years.

Requestor appears to identify two occurrences that she believes constitute new or different material facts or circumstances. Neither has any bearing on the legal land use determination for the Property, which is the narrow subject matter of the LOD. First, Requestor heard about and now

Page 3

attempts to exploit the death of Melvin Bulauan, a former resident of the Center. The Determination Holder has provided the supervising agency, the California Department of Corrections and Rehabilitation (“CDCR”), with the facts regarding Mr. Bulauan’s brief stay at the Center, specifically that he absconded and, when he failed to return, was reported to the CDCR. Second, Requestor noticed a job posting for a part-time security monitor at the Center that she believes shows a “qualitative intensification” that “voids any grandfathered status.” (Request, p. 2.) Determination Holder regularly publishes job opportunities, which are visible to the public like this one is. This does not reflect any change in operations. Further, apart from the lack of evidence regarding intensification of the group housing use, the phrase “qualitative intensification” lacks legal meaning.

**B. Requestor Offers No New Evidence**

Requestor does not provide any “names of witnesses and/or a description of documents to be produced,” as required by the Rules, Article V, Section 9(b)(ii). As her third piece of “evidence,” Requestor points to “interior images and video recorded during the COVID-19 pandemic.” (Request, p. 3, Exhibit B.) These were included in the 1803 pages submitted with the original Appeal. (Appellant Appeal Brief, Exhibit 3.3, pp. 623 – 643.) Again, there is nothing new to see. Instead, Requestor points to her inability to find new documents to support her claim. (Request, p. 3.)

Requestor also fails to provide new evidence that “could have affected the outcome of the original hearing.” (Rules, Article V, Section 9(b).) She refers again to a 1993 LOD, which confirmed the legal use of 111 Taylor as Group Housing. Requestor discussed this LOD

extensively at the July 16 hearing. She also cites to GEO's brief and testimony from that hearing, including sections regarding the non-conforming kitchen at the Property. Again, all parties and the Board had access to this information at the time of the Board's decision. Finally, Requestor refers to an "active complaint" filed with DBI. Project opponents have filed a number of DBI complaints<sup>1</sup> in concert with the LOD appeal, citing the same issues as Requestor. None of this is new. Bombarding DBI with duplicative complaints does not generate "new facts and circumstances" that may warrant a rehearing request. Instead, it underscores the fact that Requestor has other means available to voice her complaints, even if she misuses the process.

As the Board knows, since the ZA discussed it extensively at the hearing, the Planning Department is investigating a complaint (2025-003187ENF) that again duplicates the complaints raised by Requestor in her Appeal. Determination Holder is complying fully with this investigation, providing Planning Staff access to the Center for inspection along with all requested documentation.

### **C. Requestor Rehashes Failed Arguments**

Instead of citing required new information, Requestor repeats her core argument from the Appeal that "the facility has changed from residential to carceral" and is therefore no longer Group Housing. Not only has the facility not changed but, as the ZA pointed out at the hearing, "carceral" is not a land use category under the San Francisco Planning Code. To this end, the Board suggested that, as a more effective approach, Requestor could lobby the Board of Supervisors to update the Code.

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<sup>1</sup> 202537538 (opened 5/12, closed 5/12, referred), 202537536 (opened 5/12, closed 5/12 as duplicative), 202540709 (opened 7/25, closed 7/25 as duplicative)



The ZA also observed, according to Requestor's hearing transcript: "The majority of the concerns...are really focused on the operations...there's really two primary questions here...What is the legal land use? And is that within the bounds of what is defined as Group Housing?" (Request, Exhibit L.) Requestor disparages this testimony, but the Board already considered it. There is nothing new here. The land use at the Property remains the same. Requestor's arguments and lack of pertinent evidence remain the same.

#### **IV. Requestor Displays Disregard for the Board's Direction**

Requestor tells the Board what to do when the Board has stated otherwise: "The Board of Appeals has the duty to intervene." (Request, p. 6.) It does not.

At the July 16 hearing, Board members invited Requestor to speak multiple times. Only after repeatedly hearing from Requestor, after three hours of public commentary (on top of several hours from the prior hearing regarding the Property), and after extensive deliberation, did the Board determine that a hearing regarding a routine LOD is not the correct venue for Requestor's primary complaints. The Board based its decision on careful review of the administrative record and testimony, and was consistent with the law and the Board's jurisdiction.

In recognition of public interest in the Property, the Board graciously and painstakingly gave Requestor and her supporters advice on how to pursue their concerns through proper channels in the Planning Department, Department of Building Inspections, or the Board of Supervisors. Requestor nonetheless disregards the Board's guidance and instead brings this fundamentally inadequate Request. At this juncture, it is fair to assume that Requestor simply seeks to interfere with the

lawful use of private property by whatever means are available, regardless of if there is any merit to those actions.

## **V. Conclusion**

In conclusion, this Board must deny the Request for rehearing of Appeal No. 25-021 because it falls entirely short of the requirements set forth in Board Rules, Article V, Section 9(b). In a willful disregard of the Board's Rules and jurisdiction, Requestor invents words, phrases, code sections, rules, and standards and simply makes up arguments. None of this provides a basis upon which to vacate a legally proper determination by the ZA. If this Board adheres to its own standard for a rehearing, it must deny the Request.

## **BRIEF(S) SUBMITTED BY RESPONDENT DEPARTMENT(S)**



# BOARD OF APPEALS BRIEF

**HEARING DATE: August 20, 2025**

August 7, 2025

**Appeal No.:** 25-021  
**Project Address:** 111 Taylor Street  
**Block/Lot:** 0339/003  
**Zoning District:** RC-4, North of Market SUD, Group Housing SUD  
**Height District:** 80-T/120-T  
**Staff Contact:** Corey A. Teague, Zoning Administrator – (628) 652-7328  
[corey.teague@sfgov.org](mailto:corey.teague@sfgov.org)

## Rehearing Request

Section 9(b) of the Rules of the Board of Appeals sets the following threshold for granting a rehearing request: “Except in extraordinary cases, and to prevent manifest injustice, the Board may grant a Rehearing Request only upon a showing that new or different material facts or circumstances have arisen, where such facts or circumstances, if known at the time, could have affected the outcome of the original hearing. The Appellant’s rehearing request does not meet this standard.

The Appellant claims that new and material evidence has emerged demonstrating unlawful intensification of the use, and that the current use is fundamentally incompatible with the Planning Code definition of Group Housing. However, the question of unlawful intensification and/or operation of the Group Housing use was addressed during the appeal hearing and it was clarified that any potential operational issues

for the subject facility would be addressed separately through the Planning Code enforcement process (Case No. 2025-003187ENF), which is still ongoing.

The Appellant claims that a lack of regulatory verification or meaningful inspection constitutes a breakdown in administrative due diligence. However, this issue was also discussed at the appeal hearing, where it was clarified that the determination in question only determined the legal use of the property (Group Housing), and did not specifically address whether the tenant was currently operating in compliance with such use. As discussed at the appeal hearing, any question related to the existing operations of the facility will be addressed through the enforcement process, and Planning staff conducted a site visit of the facility in June of this year.

The Appellant claims that the significant public interest and harm to vulnerable populations demands reconsideration. However, this issue was also discussed during the appeal hearing. In fact, the Board recognized the significant public interest in this case and encouraged interested parties to use all other viable options to have their concerns reviewed, including through the Board of Supervisors. As noted by the Appellant, on Tuesday, July 22, Supervisor Mahmood introduced a request for hearing at the Board of Supervisors to discuss the operations at 111 Taylor Street.

## **Conclusion**

To conclude, the issues raised by the Appellant were almost all discussed at the appeal hearing. Any potential issues related to the operations of the facility will be addressed through the enforcement process, public hearings at the Board of Supervisors, and potentially other forums. The enforcement and Board of Supervisors processes to review the operations at 111 Taylor Street are the appropriate forums for such review, instead of the narrowly focused determination that was appealed. As such, the Appellant has not demonstrated that new or different material facts or circumstances have arisen, where such facts or circumstances, if known at

the time, could have affected the outcome of the original hearing, or that a rehearing is necessary to prevent manifest injustice. As such, the Department respectfully requests that the rehearing request be denied.

cc: Chandra Keslang – Appellant  
David Blackwell – Agent for the Determination Requestor  
Joe Ospital, Senior Building Inspector, DBI

# PUBLIC COMMENT

**From:** [Donna Cruz](#)  
**To:** [BoardofAppeals \(PAB\)](#)  
**Subject:** Please Reconsider 111 Taylor Decision – Appeal No. 25-021  
**Date:** Wednesday, August 13, 2025 12:50:57 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Appeals,

As a San Francisco resident, I believe the Board must grant a rehearing of Appeal No. 25-021. Since the original decision, new facts have emerged, including a death, unreported security practices, and updated evidence of intensified use, that could have significantly affected the outcome.

These facts were not available at the time of the original hearing. A rehearing is necessary under Rule § 9(b) to ensure the Board's decision is based on complete, accurate information.

Thank you for your service and consideration.

Best regards,

Donna Cruz



**From:** [Lea McGeever](#)  
**To:** [BoardofAppeals \(PAB\)](#)  
**Subject:** Rehearing Needed for 111 Taylor – Appeal No. 25-021  
**Date:** Wednesday, August 13, 2025 1:08:24 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board Members,

I write to support the request for rehearing on the zoning classification of 111 Taylor Street. As a community member concerned about carceral creep and harm to vulnerable people, I believe the Board has a responsibility to respond to new information with transparency.

There is too much at stake, not just legally, but morally. Please grant a rehearing to ensure accountability and public trust.

In solidarity,  
Lea McGeever  
D6 resident and trans Latinx activist

**From:** [bridgetbertrand](#)  
**To:** [BoardofAppeals \(PAB\)](#)  
**Subject:** Protect the Public – Support the Rehearing for 111 Taylor  
**Date:** Wednesday, August 13, 2025 3:41:52 PM

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To the Board of Appeals,

111 Taylor is not just any building, it's a historic site tied to trans resistance and the Compton's Cafeteria Riot. Its use by GEO Group as a carceral reentry facility not only conflicts with zoning law but also undermines our city's stated values.

New information justifies reopening this case. The Board has a chance to intervene and do what's right.

Sincerely a queer resident of San Francisco,

Bridget Bertrand

Sent with [Proton Mail](#) secure email.

**From:** [Delphine Mara](#)  
**To:** [BoardofAppeals \(PAB\)](#)  
**Subject:** Please Reconsider 111 Taylor Decision – Appeal No. 25-021  
**Date:** Thursday, August 14, 2025 1:34:06 AM

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Dear Board of Appeals,

As a long-time San Francisco resident who lived for over a decade in the Tenderloin and on nearby Sixth Street in SOMA, I am writing to urge you to grant a rehearing of Appeal No. 25-021 to rescind the letter of determination authorizing GEO Reentry Services to operate a for-profit carceral facility at 111 Taylor Street. Since the original decision, disturbing new facts have emerged, including the death of a man who was incarcerated there, unreported security practices by staff at the facility, and updated evidence of intensified use. These facts were not available at the time of the original hearing. Each of these new facts would have added significant weight to original appeal argument on July 16th, and could have significantly affected the outcome.

A rehearing is necessary under Rule § 9(b) to ensure the Board's decision is based on complete, accurate information.

Thank you for your service and consideration.

Sincerely,  
Delphine Mara Brody

**From:** [Wilder Zeiser](#)  
**To:** [BoardofAppeals \(PAB\)](#)  
**Subject:** Rehearing Required – Appeal LoD of 111 Taylor Street  
**Date:** Thursday, August 14, 2025 1:36:03 PM

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# Strategic Defense Against GEO Group's Letter of Determination – 111 Taylor Street, San Francisco

**Abstract:** This memorandum outlines a comprehensive legal strategy to challenge the Zoning Administrator's Letter of Determination (LOD) that allowed the GEO Group's halfway house at 111 Taylor Street to continue under an asserted grandfathered group housing use. We examine San Francisco's planning code provisions on nonconforming uses, the definition of Group Housing versus Residential Care Facility, and evidence of operational changes at 111 Taylor Street. Our analysis finds that GEO Group's current use has intensified and materially changed from the historically permitted use – introducing restrictive, carceral practices and specialized rehabilitation services beyond the scope of group housing. We present facts (security measures, restricted freedom of movement, increased program services, and occupancy changes) and legal precedent to argue that this constitutes an unauthorized change of use. We conclude that the Board of Appeals has grounds to rescind or overturn the LOD and require appropriate zoning enforcement or new conditional use authorization, thereby preventing an impermissible expansion of a nonconforming use. Recommendations are provided for evidentiary submissions and comparisons to analogous cases to bolster the appeal.

## Issue Statement

**Legal Issue:** Whether the current operation of the Taylor Street Residential Reentry Center (111 Taylor St.) by GEO Group constitutes an intensification or unlawful change in use beyond its prior legal nonconforming status, thus invalidating the Zoning Administrator's Letter of Determination that classified it as continued Group Housing. Specifically, can opponents show that the facility's modern operations – including heightened security protocols, restricted resident freedoms, increased occupancy, and on-site rehabilitative services – have transformed the use into one that zoning law treats as a different use (such as a Residential Care Facility or quasi-carceral institution) requiring new approval?

Position (Hypothesis): Yes. The evidence indicates that GEO Group's halfway house has materially expanded and altered the historical use in ways that trigger zoning violations. The facility now operates with prison-like conditions (daily headcounts, controlled ingress/egress, drug testing) and provides specialized treatment services by licensed staff – characteristics aligning with an institutional Residential Care Facility rather than a traditional group housing use. These changes represent an intensification of use that is not protected by the site's prior nonconforming status, thereby invalidating the LOD's conclusion that "nothing has changed" in the use.

The core legal question for the Board of Appeals is whether the Zoning Administrator erred or abused discretion in finding the use consistent with zoning. We argue that, given the factual developments, the LOD was mistaken: the current operations violate the Planning Code's limits on enlarging or intensifying nonconforming uses and fail to meet the definition of group housing. This memorandum marshals the relevant law and evidence to demonstrate that the Board can and should overturn the LOD and require GEO to seek proper authorization or cease the intensified use.

## **Legal Framework and Zoning Rules**

San Francisco Planning Code – Nonconforming Uses: 111 Taylor's halfway house is a nonconforming use (a formerly permitted use now not principally allowed under current zoning). Under SF Planning Code §181, a nonconforming use "shall not be enlarged, intensified, extended, or moved" except to become more conforming. Any increase in the degree of nonconformity (either by changing to a less permitted use or intensifying the existing use) is prohibited. The intent of these rules, echoed by California land use precedent, is to prevent the expansion or intensification of nonconformities and gradually bring uses into compliance with current zoning. In *Point San Pedro Road Coalition v. County of Marin* (2019), for example, the court struck down an approval that allowed a nonconforming quarry to import new materials, finding it an impermissible "extension, enlargement, or intensification" of the use beyond what existed when it became nonconforming. The principle is that a nonconforming use must remain materially the same in nature and scope; significant operational changes or expansions void its protected status.

"Group Housing" vs. "Residential Care" Definitions: San Francisco's Planning Code defines Group Housing (a residential use) generally as a facility that provides lodging (with or without meals) for occupants in a group living arrangement "without individual cooking facilities". Classic examples are dormitories, SRO hotels, or boarding houses. Crucially, group housing is predicated on residents living in a relatively independent manner (albeit with shared facilities) – they are not institutional inmates and typically have freedom of movement and no on-site medical or therapeutic regimen beyond ordinary domestic living.

By contrast, a Residential Care Facility (RCF) is defined as an Institutional Healthcare Use that provides lodging, board and care to persons in need of specialized services by State-licensed personnel. Under Planning Code §102, such facilities include those offering rehabilitation for addiction, psychological disorders, or other therapeutic services to 7 or more residents, and they are considered a different use category (Institutional, not purely Residential). In practice, a halfway house that provides counseling, medical oversight, drug testing, or similar structured programs may fall under this RCF definition if these services are substantial and provided by licensed professionals.

**Zoning Controls at 111 Taylor:** The property is zoned RC-4 (Residential-Commercial, High Density) and lies in the Tenderloin/North of Market Special Use District. Group Housing was historically principally permitted in RC-4 (and the North of Market SUD) at the time GEO's predecessor began operations. However, zoning amendments effective August 2022 prohibited new group housing in that area except for certain affordable housing or SRO projects. Thus, GEO's use continues only by grandfathered status as a legal nonconforming use predating the 2022 ban. Importantly, the special use district regulations explicitly required that Residential Care Facilities (uses with specialized licensed care) could only operate if specifically authorized by the Planning Commission – reflecting a tighter control on institutional uses in this neighborhood even before 2022.

**Prior Determination Letters & Advisory Clause:** Over the decades, the Planning Department repeatedly affirmed 111 Taylor's use as Group Housing in determination letters (2006, 2016, 2020, 2022) for GEO's contract compliance. However, those letters included a crucial advisory: if the program at 111 Taylor ever evolved to provide "specialized aid to seven or more residents" by state-licensed professionals (e.g. psychological or addiction rehabilitation), it would be reclassified as a Residential Care Facility, triggering a required change-of-use permit and public process. In fact, GEO Group applied in 2022 for a change-of-use permit (presumably anticipating the need to classify as a Residential Care Facility), though they never completed that process. This indicates an awareness that their services might cross into RCF territory. Notably, the January 2025 LOD issued by Zoning Administrator Corey Teague omitted that advisory clause, an omission appellants argue was significant given the current operations.

**Standard of Review – Board of Appeals:** The Board of Appeals' task is to decide if the Zoning Administrator "erred or abused discretion" in issuing the LOD affirming the use. In July 2025, Board members acknowledged their authority was limited to zoning code interpretation and evidence of compliance. They could overturn the LOD if persuaded that the Administrator's decision was based on incomplete facts or misinterpretation of the code (for instance, not accounting for an intensification that legally alters the use category). The Board does not make new law, but it can require the Department to revisit a determination if the appellants show the actual use no longer fits the claimed category. The Board can also consider city policies (General Plan consistency, etc., as noted in the 1993 letter citing

Master Plan policies against loss of housing) as context for whether the use is appropriate.

In sum, the legal framework establishes that any substantial change in the nature or intensity of GEO's use at 111 Taylor voids its claim to continued group-housing status. We now turn to the factual evidence of how the use has changed and intensified, to demonstrate that the current halfway house operation is not the same use that was grandfathered in.

## **Factual Background and Evidence of Intensification**

**Historic Use of 111 Taylor:** The five-story building at 111 Taylor Street has a long history in the Tenderloin. Notably, its ground floor housed Gene Compton's Cafeteria, site of a seminal 1966 riot against police harassment of transgender patrons. Above the diner, the building was a residential hotel which in the mid-20th century provided housing (SRO-style) for marginalized communities including trans people. In the late 1980s, the property transitioned into use as a Residential Reentry Center. GEO Group (through a subsidiary, possibly "WBP Leasing Inc.") purchased the site in 1989 and has operated it as a halfway house for formerly incarcerated individuals ever since. The program primarily serves state parolees and federal prisoners in transition (often under contracts with CDCR and the Federal Bureau of Prisons).

**Initial Zoning Authorization (1990):** When the reentry program was first established, it appears to have been operated by a nonprofit (Reality House West) in partnership with GEO. In December 1990, Zoning Administrator Robert Passmore issued a letter confirming that housing federal work-furlough program residents at 111 Taylor complied with the Planning Code, provided that residents stayed 60+ days and "would not require specialized aid by personnel licensed by the State." Under those conditions, the use was deemed Group Housing per Code §209.2(a). Passmore noted the building's RC-4 zoning and North of Market SUD permitted group housing as a principal use, so a halfway house without medical/therapeutic services fit within zoning.

**1993 "Quasi-Jail" Violation Decision:** Troubles emerged when the San Francisco Sheriff's Department attempted to utilize 111 Taylor to house pre-trial detainees (i.e., individuals in jail custody awaiting trial). In July 1993, Zoning Administrator Passmore formally denied the Sheriff's request, finding it would convert part of the building into a "quasi-jail" – a use violating the Planning Code. Passmore's letter to Sheriff Michael Hennessey is illuminating: it explains that housing units (dwellings or group housing) "characteristically provide shelter and relative freedom to come and go ... to utilize social and commercial facilities in the neighborhood." By contrast, prisoners in the Sheriff's program would not have such freedom. He concluded that continuing to use 111 Taylor as a secured detention facility was "a violation of the City Planning Code" – partly because it conflicted with multiple City policies favoring preservation of housing and neighborhood character, and partly because

jails were not an allowed use in that district without clear Master Plan support. In short, restricting resident liberty transformed the use away from group housing. Passmore called the Sheriff's occupancy a displacement of housing and threatened enforcement if it did not cease. This 1993 incident sets a critical precedent: 111 Taylor cannot be lawfully operated in a manner akin to a jail or locked institution under the guise of "group housing." Freedom of movement is a defining feature of group housing in planning terms.

Operational Continuity and Changes (1990s–2010s): After 1993, GEO's facility presumably reverted to focusing on post-sentence reentry populations (parolees and halfway house residents, not pre-trial jail inmates). For many years, the facility co-existed with the neighborhood, though not without controversy. Community advocates noted tensions between the halfway house clientele and other residents. (For instance, a historical archive mentions a 1990s protest by other SRO tenants in the building about the "presence of prisoners" affecting the atmosphere, suggesting GEO's program at one point mixed with low-income housing tenants.) The record indicates that the building eventually became dedicated entirely to the reentry program.

#### Violent Incident Directly Linked to Current Facility Operations

On May 29, 2023, SFPD arrested a current resident of 111 Taylor Street, operated by GEO Group, for the stabbing of a woman in San Francisco's Chinatown. The official SFPD press release confirms the suspect was living at 111 Taylor at the time of the incident. This violent event, together with other documented incidents including the death of resident Melvin Bulauan and repeated code violations, reflects a substantial change in the character and intensity of use from prior approvals. The current operations pose an increased risk to public welfare and have demonstrably greater adverse neighborhood impacts than the historical use, undermining the legal basis for the Letter of Determination.

Over time, GEO's contracts grew. By 2025, GEO held contracts valued at over \$100 million to operate 111 Taylor's reentry center for both the California Department of Corrections and Rehabilitation (CDCR) and the Federal BOP. These contracts have required periodic zoning confirmation letters. GEO routinely sought Letters of Determination (in 2006, 2016, 2020, 2022) from Planning stating that the use is group housing – likely as a condition for renewing government contracts. Each time, the Zoning Administrator issued a letter upholding the group housing classification (often verbatim), typically including the cautionary language about not providing specialized care to avoid becoming an RCF.

It appears that in late 2021 or 2022, GEO might have begun expanding programming, because Public records show GEO applied for a building permit to change the use to Residential Care Facility in 2022 (likely acknowledging that their services triggered that definition). However, GEO never completed the change-of-use process. Zoning Administrator Teague later noted that a recent code change meant a public hearing is no longer required to establish an RCF at that site (RCFs became more widely permitted



citywide), but a permit would still be needed. Teague expressed uncertainty as to “why Geo Group abandoned its permit application”. One inference is that GEO chose to rely on the status quo determination as group housing – perhaps to avoid the scrutiny and building upgrades that an official RCF designation would entail – especially once the zoning letter omission of the advisory removed a red flag.

The 2025 LOD and Appeal: In January 2025, Zoning Administrator Corey Teague issued the LOD in question, affirming that 111 Taylor’s use “continues to be Group Housing” under the code. He cited that the site is used for “a work furlough program” with government sponsors and noted group housing is principally permitted in RC-4 (with a density of up to one bedroom per 70 sq ft of lot area). However, crucial context was that by January 2025, new group housing uses were banned in RC-4 due to 2022 legislation – so GEO’s use is nonconforming but “grandfathered” because it predated the ban . Community activists (the Compton’s X Coalition and Turk x Taylor Initiative) learned of the LOD only after issuance and missed the initial 30-day appeal window due to lack of direct notice. In May 2025, the Board of Appeals unanimously granted appellant Chandra Laborde permission to file a late appeal, faulting the Planning Department for not informing known interested parties of the LOD . That set the stage for a full appeal hearing on July 16, 2025.

At the appeal hearing, over 100 community members and advocates spoke, raising two main themes: (1) the cultural and moral outrage of a for-profit prison company occupying a transgender historic site, and (2) detailed claims that GEO’s current operations violate the zoning definition of group housing. Despite sympathetic comments, the Board (in a 4-1 vote) upheld the LOD, citing lack of “legal grounds” (i.e., insufficient hard evidence at that moment to show a code violation). Commissioners acknowledged concerns and urged further investigation by Planning and Building Inspection departments. The Board also hinted the matter might be taken up legislatively by the Board of Supervisors given its broader significance.

Key Evidence of Change/Intensification: Appellants and public testimony have brought forward specific factual evidence to support that the use of 111 Taylor has intensified or changed in character beyond the original allowed scope:

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Prison-Like Security Measures: The facility imposes strict security and surveillance on residents. Appellants noted “head counts and urinalysis testing” are now routine at the property. Residents must submit to regular drug screenings and daily roll-calls, which are not typical in ordinary group housing but are standard in correctional or supervised facilities. This suggests the program has taken on a custodial nature.

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Restrictions on Freedom of Movement: Multiple sources, including historic precedent

and current accounts, indicate residents cannot freely come and go. In 1993, freedom to come and go was cited as essential to group housing. Today, although residents are not locked in cells, those under federal halfway house rules are often required to remain on-site except for approved excursions (work, medical appointments, etc.), with curfews and sign-in/out requirements. Indeed, a recent tragic case underscores this: Melvin Bulauan, a resident who died after leaving 111 Taylor in July 2025, had told his family he'd "rather be back in prison" than stay at 111 Taylor. His family reported that when they notified GEO staff of his death, the facility did not even know he had left – implying a failure in monitoring or an environment where someone can abscond. These accounts portray a facility operating closer to a carceral setting (where leaving without permission is akin to escape) than a voluntary group home. Laborde explicitly argued that the current use "has now been intensified by restricting freedom of movement" just as the Sheriff's quasi-jail proposal did.

- **Specialized Services and Licensed Personnel:** Perhaps the most salient change is the expansion of on-site services for rehabilitation. GEO's own materials describe the Taylor Street Center as providing "monitoring, and transitional services", a "safe and secure residential setting as an alternative to custody... with flexibility to meet the individual risk and needs of each resident." In practice, GEO provides cognitive behavioral therapy, substance abuse counseling, employment training, and other programs at its reentry centers. According to GEO Group's website, residential reentry services include "rehabilitation and substance abuse counseling, and vocational and education programs" for parolees. These are precisely the kind of "specialized aid" by licensed or certified professionals that triggers classification as a Residential Care Facility under the Planning Code. For instance, substance abuse treatment implies certified counselors or clinicians on staff; cognitive behavioral classes are often led by trained facilitators; even "monitoring" suggests professional case managers. This is a qualitative expansion from merely providing room and board. The coalition emphasized that the program is "run more like a residential care facility than group housing" now. In other words, 111 Taylor is effectively functioning as a treatment center (halfway between a prison and a rehab center), not a simple lodging house.
- **Capacity and Occupancy Changes:** Although exact bed counts are not published, activists have raised concerns that GEO may have increased the number of residents/beds beyond what was historically present. Laborde pointed to "open complaints" filed with the Department of Building Inspection to verify the number of beds in the facility and the conditions inside. If GEO internally reconfigured space to add bunks or accommodate more clients without permits, that is a physical intensification (higher density of use). The Planning Code would consider adding more occupants (if beyond the density allowed or beyond what existed in 1989) as an enlargement of use. We know RC-4 group housing density is one bedroom per 70 sq

ft lot area – the property must stay within that. Determining any violation here requires the investigation that is underway; however, the presence of complaints shows this is a point of contention. Even anecdotal descriptions call the facility “scores” of former prisoners , suggesting dozens of residents at any given time.

- Physical and Operational Modifications: The facility likely has security installations (cameras, controlled entry points, perhaps even locks or alarms on doors) that a normal group housing wouldn't. The presence of on-site offices for case managers or probation officers is another factor – essentially part of the building is used as an administrative office for correctional supervision, not just housing. These changes, while not fully documented in public sources, are implied by the nature of GEO's contract (which requires close supervision and reporting).
- Community Impact and Complaints: The intensification is also evidenced by community testimony about negative impacts. Nearby residents and even former clients describe 111 Taylor as having “prison-like” conditions. One speaker at the appeals hearing said “it's worse than a prison” – an overstatement perhaps, but telling of perceived character. The Tenderloin community has voiced that the facility is not operating like a neighborly group home, but rather like a high-security institutional use that is closed off from the community. The ground-floor commercial space has been kept vacant (“completely inactive... doesn't help neighborhood safety” noted one community member), presumably due to security concerns, which is contrary to how a residential hotel might activate the street. All these qualitative factors underscore a change in how the site functions day-to-day compared to a standard group housing.

Ongoing Investigations: Zoning Administrator Teague acknowledged at the July 2025 hearing that an enforcement case is open and that Planning staff conducted a site visit in June 2025, requesting documents from GEO. He stated, “If we determine that someone is not operating in [group housing] way, then that is an unauthorized change of use,” which would force GEO to comply or seek proper authorization. This statement is essentially a concession of the appellants' legal point: if evidence shows the operations are that of an RCF or similar, the current use is unlawful without permits. The Board of Appeals, however, did not have the results of that investigation at the time of the hearing and thus felt constrained.

In summary, the factual record reveals a pattern of intensification: from a lightly regulated transitional lodging in 1990 (no licensed services, minimal security) to a heavily regulated reentry program in 2025 (with therapeutic programs, surveillance, and limited liberty). We next apply these facts to the legal criteria to show why this amounts to a zoning violation.

## Analysis: Application of Law to Facts

1. The Current Use Exceeds the Scope of the Grandfathered Group Housing Use. Under SF Planning Code §§181–182, a nonconforming use cannot increase in intensity or change its fundamental character. The question is: Has GEO's use of 111 Taylor materially deviated from the use as it existed when it was compliant (late 1980s/early 1990s)? The evidence resoundingly shows Yes.

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Loss of “Residential Character”: Group housing is meant to be residential in character – essentially housing people who live their lives freely (albeit in a group setting) and use the city around them. In 1990, Planning explicitly tied its approval to the condition that residents would not need specialized licensed care. This implies the envisioned use was akin to a sober-living environment or simple halfway house where people come and go to jobs, etc., without on-site treatment programs. Fast forward to today: The presence of structured treatments, daily monitoring, and rules limiting movement indicates the use is no longer primarily “housing” but a form of community correctional facility. As Passmore articulated in 1993, if residents cannot come and go freely and the use starts to resemble a jail or institution, it fundamentally violates the definition of group housing. The degree of nonconformity has increased because what’s happening at 111 Taylor is less permissible in the zoning district than what was originally allowed. In zoning terms, it has shifted toward an Institutional Use (which, if new, likely wouldn’t be allowed in RC-4 without special approval). Thus, the nonconforming use is operating outside its allowed envelope.

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Provision of Licensed Specialized Services = Residential Care Facility: The LOD’s omission of the advisory clause notwithstanding, the rule remains – once the program provides specialized aid by licensed personnel to 7+ residents, it meets the definition of a Residential Care Facility . GEO’s own description and services confirm they do exactly that: counseling for substance abuse, cognitive therapy, etc., delivered by trained staff. By code, a Residential Care Facility is a different use category (Institutional Healthcare) than Group Housing (Residential). In the RC-4 zone (and North of Market SUD), an RCF historically required conditional use authorization by the Planning Commission . Teague noted that while the code was amended to streamline RCF approvals recently, a building permit at minimum is needed. GEO’s failure to obtain a change-of-use permit means it is very likely operating an RCF illegally. The Board of Appeals can rely on the plain language of the Code: if evidence shows those services are provided (and it does), then as a matter of law the use is misclassified in the LOD. This mirrors the situation in Point San Pedro Road Coalition, where an appellate court held that even if a county was willing to allow a change, if the change caused an intensification beyond what existed when the use

became nonconforming, the county “lacks the power to waive or consent” to that violation. Likewise, our Zoning Administrator cannot ignore the effective change in use – doing so was legal error. The Board of Appeals should find that continuing operations without the required RCF permit is an error in the LOD.

- Quasi-Carceral Operations – Intensification of Use: The introduction of prison-style security protocols (headcounts, curfews, drug tests) and the restriction of resident activities represent a substantial intensification compared to a standard group home. These measures likely entail more staff, longer staff hours, and more infrastructure dedicated to security – precisely examples of intensification noted in zoning contexts (e.g., more employees, extended hours = intensification) . A group housing use typically wouldn’t have 24/7 security staff and scheduled drills or counts; a halfway house now effectively does. The Marin County quarry case again is instructive: adding a new process (importing asphalt grindings) was an intensification because it was “a new and additional operation” not previously done. Here, adding strict supervision and drug testing of residents is a new operational dimension beyond mere housing. It transforms the experience for both residents and the community (nearby neighbors now live next to what is functionally a correctional facility, not just a lodging house). This undermines the argument that “nothing has changed since 1989”. On the contrary, much has changed, and each change made the use less conforming to the zoning’s intent (which favors housing over incarceration in that neighborhood).
- Duration and Continuity: GEO might argue that because they’ve continuously run a reentry program, it’s the same use in a broad sense (housing ex-offenders). However, continuity alone is not dispositive if the manner of operation changed significantly. Courts have noted that a nonconforming use’s protections do not give a right to change the method of operation in a way that intensifies the use. For example, an early landmark case (*Hill v. City of Manhattan Beach*) held that intensification can occur even without expansion of footprint, such as by changing the nature or volume of activity. Here, the basic character in 1989 was transitional housing; in 2025, it is part transitional housing, part lock-down facility, part treatment center – a hybrid far beyond the original scope. The Board of Appeals could find that the “aggregate of changes” in how 111 Taylor operates amounts to an unlawful expansion of the nonconforming use.

2. Precedent and Policy Support for Enforcement: San Francisco’s own precedents support a strict view. The 1993 Zoning Administrator decision is essentially a precedent on this very site that the City should not allow carceral uses to masquerade as housing. While that dealt with the Sheriff (a public agency) and pre-trial detainees, the logic is directly applicable to

GEO (a private operator) and post-conviction inmates. In both scenarios, the individuals are under custodial rules. The City's Priority Policies (Planning Code §101.1) require preservation of existing housing and neighborhood character. Converting (even implicitly) a residential hotel into a correctional institution flies in the face of those policies – an argument appellants Laborde and others have made in framing this as a social justice and land use issue. The Board of Appeals should consider that upholding the LOD effectively blesses a de facto jail use in a residential zone, which is inconsistent with the spirit of the Planning Code.

Other jurisdictions' practices also align: many city zoning ordinances explicitly differentiate halfway houses from ordinary group homes because of their greater impacts. For instance, some California cities require conditional use permits for any "community residential reentry center" due to security and supervision issues. The principle is that intensive supervised facilities are regulated more stringently than typical housing – supporting our stance that GEO's halfway house is in the wrong category now.

### 3. Rebutting GEO's Likely Counterarguments:

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GEO's claim: "Nothing has changed since 1989; only the appellants' preference has changed." GEO's representative David Blackwell argued the use is the same and that opponents simply dislike it now. The evidence flatly contradicts this. The existence of prior letters with the advisory clause shows that the City always foresaw a potential change – and indeed GEO's own actions in 2022 (applying for an RCF permit) show something did change. Moreover, the presence of things like drug testing and headcounts "now in place" versus presumably not in 1989 is a factual change. The Board should not accept a conclusory assertion from GEO that nothing changed; it should look at objective criteria (licensed services, movement restrictions, etc.). If GEO argues these security measures always existed, they would need proof (which is unlikely – halfway house practices in the 80s/90s were generally looser, and certainly the 1990 letter implies a more freedom-oriented program). Even if some form of monitoring existed, the degree is clearly higher now given the death of a resident who felt like he was in prison and reports of onerous rules.

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GEO's claim: "Group Housing is principally permitted in RC-4; our use is therefore permitted." This is misleading. Yes, group housing was permitted, but GEO's use must actually meet that definition to claim the benefit. As shown, it veered into RCF territory. Additionally, as of 2022, group housing is no longer permitted in RC-4 (except SRO/affordable), making GEO's use strictly a nonconforming privilege, not a by-right use. Nonconformities are not to be expanded. So GEO cannot simply say "we're allowed here"; they are only allowed to continue what they had, not alter it. The Board should focus on what the use is, not who operates it or how long – classify the

use properly, then ask if that use is allowed. If it's actually an RCF, GEO would need a new permit regardless of prior operation.

- GEO's claim: "We have a vested right or grandfathering, since we've operated 30+ years." Longevity alone doesn't legalize an unlawful expansion. Under California law, a vested right in a nonconforming use does not protect expansions or changes (Hansen Bros. Enterprises v. Board of Supervisors, 12 Cal.4th 533 (1996) ). The vested right covers only the use as it existed when it became nonconforming. Here, that moment is arguably 2022 when group housing was banned; GEO has a right to continue group housing use, not to initiate a quasi-institutional use. The Board can find that GEO exceeded what was vested.

- GEO's claim: "The Planning Department hasn't found a violation yet, so we're in compliance." This is circular. The enforcement investigation is ongoing precisely because evidence of a violation has been alleged. Lack of a concluded investigation at the moment of the hearing doesn't mean no violation exists; it means more info is being gathered. The Board is entitled to weigh evidence presented by appellants directly. In administrative law, especially at a de novo appeal hearing, the Board can make its own factual determinations if substantial evidence is in the record. We have substantial evidence from testimonies, GEO's own statements, and historical documents. In fact, the Board expressed that their hands were tied only by lack of "legal grounds" (which we interpret as hard proof). This strategic plan aims to supply those grounds in the form of documented comparisons, affidavits from former residents or experts, etc. With the right evidentiary record (see Recommendations below), the Board can find error.

4. Jurisdictional Comparison: It is useful to analogize 111 Taylor's situation to other land use disputes:

- In Los Angeles, for example, courts have held that converting a hotel into a de facto drug rehab facility without permits violated zoning because the intensity of use (staff, patient interactions, etc.) was far beyond that of a hotel. San Francisco's stance should be similar: a purported "group housing" use that is effectively a detention/treatment center cannot continue unchallenged.
- Another comparison is to community facilities like homeless shelters or rehab centers, which in SF require neighborhood notification and often conditional use

approvals. What GEO runs is arguably closer to a large homeless/transitional shelter with enforcement components. If someone tried to start a brand new 75-bed transitional facility with daily drug tests in RC-4 today, it likely would need a Conditional Use authorization or would be outright prohibited. GEO's historical foothold should not exempt it from these standards when it has evolved into essentially the same category of regulated use.

- The Stokes v. Board of Permit Appeals (1997) case in SF (involving a bathhouse) underscores that misrepresenting the nature of a use can lead to permit revocation. Here, while GEO obtained permits honestly in 1989, the current misclassification in the LOD could be seen as an inadvertent misrepresentation of the use's nature. Once the true intensity is recognized, the permits/approvals must catch up to reality – as happened in Stokes, where the Board and courts required new permits for changed conditions.

In sum, both SF's own past cases and broader California zoning principles reinforce that the Board of Appeals has a solid legal basis to declare: the GEO facility is no longer operating under the same use parameters that were legally grandfathered; hence the LOD's conclusion is incorrect.

## Conclusion

**Findings:** The evidence and analysis demonstrate that GEO Group's current operation at 111 Taylor Street constitutes an intensified and fundamentally altered use that violates the Planning Code. It has effectively transitioned from a Group Housing use (as defined in the Code) into an unauthorized Residential Care Facility or institutional use. This change increases the degree of nonconformity and thus voids the claim to continued legal status under §181. The Zoning Administrator's Letter of Determination, by failing to account for these changes, was issued in error. The Board of Appeals has ample ground to rule that the ZA abused his discretion or erred in determining the use is in-line with zoning, given the substantial evidence of changed operations.

**Relief Sought:** We urge the Board of Appeals to rescind or overturn the LOD dated January 28, 2025. In practical terms, this means directing the Planning Department to re-evaluate 111 Taylor's use classification. The Board could explicitly find that the use must be reclassified as a Residential Care Facility (or equivalent institutional use) and thus cannot continue without the proper permits and any required public hearings. Overturning the LOD would in effect invalidate GEO's ability to claim compliance, which could lead to enforcement action requiring the facility to cease operations until coming into compliance (or significantly modifying operations to genuinely fit the group housing definition, which



seems unlikely without giving up the very features GEO's contracts require).

Consequences: An overturned LOD would signal that GEO must either: (a) Apply for a Change of Use to a Residential Care Facility and meet all associated Building Code and Planning Code requirements (which could include a Conditional Use hearing if any are still required, compliance with life-safety codes for institutional occupancy, etc.), or (b) Revert to a lawful group housing model – meaning dramatically scaling back supervision and services, essentially operating more like a traditional boarding house (this option is theoretical, as it would contradict their contracts). If neither happens, the City could eventually pursue fines or an abatement order to discontinue the unlawful use.

The broader impact is to uphold the integrity of zoning laws: San Francisco would be affirming that even well-intended uses (reentry programs) must operate openly and under correct use classifications – especially when they impact vulnerable communities and historically significant sites. It also aligns with the City's commitments to protect residential neighborhoods from incursions of quasi-carceral institutions without due process.

Submitted by Wilder Zeiser

Documents submitted for the hearing on July 16, 2025 for Appeal No. 25-021

<https://www.sf.gov/meeting-20250716-board-of-appeals-hearing-july-16-2025>