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EXEMPT FROM FILING FEE – GOV. CODE § 6103

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 CITY OF AGOURA HILLS, a municipal)
corporation,)
12 Plaintiff,)
13 vs.)
14 JAMES MAYFIELD, an individual; SHEILA)
15 ZAMEL, an individual; WHISPERING)
OAKS CHURCH, INC., a California)
16 Corporation; and DOES 1-50, inclusive,)
17 Defendants.)

CASE NO. 20VECV01312
[Assigned for all purposes to Hon. Virginia Keeny in Dept. W]

DECLARATION OF ALLEN TRIPOLSKIY IN SUPPORT OF PLAINTIFF'S MOTION FOR ISSUANCE OF PRELIMINARY INJUNCTION

[Filed concurrently with Motion for Issuance of Preliminary Injunction; Declarations of Ramiro Adeva and Amir Hamidzadeh; Exhibits to Declarations; Request for Judicial Notice; and [Proposed Order]]

Hearing:
Date: April 29, 2021
Time 8:30 a.m.
Dept: W

RES ID: 149119750020

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DECLARATION OF ALLEN TRIPOLSKIY

I, Allen Tripolskiy, declare and state as follows:

1. I am over 18 years of age and am not a party to this action. I am a Code Compliance Officer for the CITY OF AGOURA HILLS (the "City") and have been employed with the by the City since February 24, 2020. I have gained personal knowledge from my review of the files in this matter maintained by the City in the ordinary course of business. If called as a witness to testify as to the matters set forth herein, I could and would testify competently thereto.

2. This declaration concerns real property located at 28347 Balkins Drive, City of Agoura Hills, County of Los Angeles, California (hereinafter "Subject Property").

3. My duties as a Code Compliance Officer include the inspection of properties to ensure they comply with regulations of the Agoura Hills Municipal Code (hereafter, the "AHMC"), some of which are as follows: Article V [Sanitation and Health; Chapter 6 (Nuisance Abatement)], Article VIII [Building Regulations], Article VI [Taxes; Licenses; Business Regulations] and Article IX [Zoning Regulations]. When activities and/or conditions are identified that violate the AHMC, I seek their correction in order to protect public health, safety and welfare.


4. As part of my job duties, I regularly review files maintained by the City on real properties. I am familiar with these records as they relate to the Subject Property. I am also familiar with the City's actions with regard to the Subject Property, and letters, complaints, and other communications with Defendants and other community members related to the Subject Property.

5. As fully detailed in the concurrently filed declarations, the City has been receiving complaints about construction activities and weddings ceremonies taking place at the Subject Property since July 2019. On January 26, 2021, I received another complaint that weddings are still taking place at the Subject Property. Wedding guests are being directed to use the Old Agoura Park as a parking lot. Defendants facilitate operation of their illegal business by providing shuttle busses to transport wedding guests to and from the Subject Property. However, guests who miss the shuttle bus park their vehicles along Balkins Dr. (the street on which the Subject

1 Property is located) in order attend the ceremony at the Subject Property. Defendants' operation
2 of their illegal commercial wedding venue has resulted in an unwanted increase of vehicle and
3 foot traffic which has had, and continues to have, detrimental impacted on the character of the
4 community and the surrounding area.

5 6. I have reviewed Defendants' recent social media posting for "Whispering Oaks
6 Chapel" reveal Defendants continue to operate the Subject Property as a commercial wedding
7 venue (in violation of AHMC §§ 6802(a)(1) and 9222.1 et seq.). A true and correct copy of
8 screenshots of Whispering Oaks Chapel's recent social media postings are concurrently submitted
9 as Exhibit 8; <https://www.facebook.com/whisperingoakschapel/>;
10 [https://www.instagram.com/explore/locations/2184129701872426/whispering-oaks-](https://www.instagram.com/explore/locations/2184129701872426/whispering-oaks-chapel?hl=en)
11 [chapel?hl=en](https://www.instagram.com/explore/locations/2184129701872426/whispering-oaks-chapel?hl=en).

12 I declare under penalty of perjury under the laws of the State of California that the forgoing
13 is true and correct, and that this declaration is executed on this 22 day of March, at Agoura
14 Hills, Los Angeles County, California.

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17 _____
18 Allen Tripolskiy, Declarant
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. At the time of service, I was over 18 years of age and not a party to this action. My business address is 11500 West Olympic Boulevard, Suite 550, Los Angeles, CA 90064.

On April 1, 2021 I served true copies of the following, described as, **DECLARATION OF ALLEN TRIPOLSKY IN SUPPORT OF PLAINTIFF'S MOTION FOR ISSUANCE OF PRELIMINARY INJUNCTION** on the interested parties in this action, as follows:

Counsel for Defendants

Robert L. Scott
Scott & Associates
300 East Esplanade Dr., 9th FL
Oxnard, CA 93036
E: scott@civiccenter.com

BY ELECTRONIC TRANSMISSION – ONE LEGAL. I caused an electronic version of the documents to be submitted to the Superior Court of California and thereafter caused an electronic version to be served to the persons in the above service list via the litigation support service One Legal.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 1st day of April, 2021 at Los Angeles, California.



Miriam Gonzalez, Declarant