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**SUPERIOR COURT OF STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

Ramona Mayon, Plaintiff, v. City and County of San Francisco, Defendant	Case No. CGC-20-588010 DECLARATION OF RAMONA MAYON Date: Jan 6, 2021 Time: 11 am Dept: 302 Filed: Dec 29, 2020
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4 To this Honorable Court,
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6 Given the panicked nature of the application filed on Dec 29, 2020, Plaintiff would state that the
7 holding pattern remains the same re. her vehicle-home. The neighbors are hostile, especially at
8 night, coming outside to yell at her in “that raggedy RV piece of crap” for “homesteading” their
9 street, as just occurred about half an hour ago, shortly after midnight. This type of dialogue has
10 happened maybe half-a-dozen times since the RV’s arrival (escaping being snowed in two hours
11 north of Truckee), in addition to the initial incident on Dec 23, 2020. It has not yet been towed
12 (five SFPD visits/ but only one ticket), but all have warned it will happen at any time. Hunger
13 Strike signs remain in the windows. Today was day #13. She is blogging lightly about it at
14 www.ramona-mayon.com She remains in extreme fear for her safety and the continued custody of
15 her possessions, including her husband’s ashes. She was already sick, but now has a broken and
16 infected tooth, flamingly painful. Her dentist appointment is on Feb 3 at UCSF. That is the main
17 reason she is filing this Declaration, because it hurts to even talk. This isn’t some publicity stunt by
18 an advocacy org. This is the last bit of life left in **one** woman who has been stripped of all her
19 dignity, made homeless March 18, 2020 because that home was “just” an RV. She then had to
20 suffer watching her husband die without care (in another county’s *Project Roomkey*). Upon
21 coming to San Francisco, coming for succour from old friends (and former family case workers) at
22 the Sunset Youth Services, she was subject to not one but two sweeps (Nov 18 + Dec 10 2020) of
23 her day use tent (slept in SUV for safety). She will not *quietly* lose her home (again) and the
24 comfort she finds being in it. The SAFETY she finds in it.
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4 There has been a renewed service contract Mrs. Mayon re-signed with the HOT team and they
5 have asked for an estimate from her (already-hired) mobile mechanic. With or without the City's
6 help, the mechanic will begin work next Saturday, and hopefully, the stimulus checks come in
7 beforehand. If not, she has the capacity to overdraw her bank account up to \$500 and will also get
8 a payday loan. Mechanic has also agreed to be her temporary driver and move the RV every
9 21-days from campground-to-campground, helpful since he lives in the Sacramento region which is
10 where the majority of "Thousand Trails" camping membership preserves are located. This estimate
11 was sent via email Jan 4, 2020, after a phone call requesting it, and is attached to this declaration as
12 Exhibit A. It's not really a request for the City to disburse funds as much as it is simply the
13 step-by-step plan between she and the mechanic to return her and her vehicles to a rural
14 campground setting (with a case history section added). A point of law: Prop Q says she has to be
15 offered "Homeward Bound" services (as well as offered the storage of belongings) prior to being
16 made to remove her tent. Of course, the law also says notice 24-hours ahead and that didn't
17 happen either time. Sweeps 11.18.20 and again 12.10.20 per videos submitted on thumbdrive with
18 this application.
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21 Part of signing up (again) with the HOT team for "services" this time around involved an
22 interview with a Housing Assessment caseworker. The plaintiff would like to describe one part of
23 the interview that sums up why she finds it necessary to ask for this Court to intervene. What she is
24 about to describe is the essence of official bias so ingrained they can't even see it for themselves. It
25 took place standing outside the RV for the interview, which consisted of a series of about 30
26 questions related mostly to housing. When she asked how often in the past three years had the
27 plaintiff lived in places unsuitable for human habitation, she listed off examples: "a shelter, a public
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3 park, a vehicle” and made a hand gesture towards the RV. Intentionally Mrs. Mayon answered her
4 truth, that the only time she was homeless as being described, “unsuitable for human habitation”
5 was since Oct 15, 2020 when she arrived in San Francisco to get her SUV repaired (*that task*
6 *completed two weekends ago*). She was obtuse on purpose just to watch the worker do it over and
7 over again, the little hand gesture that she made when she said “unsuitable for human habitation”.
8 I would refer you to exhibit B, which is a letter dated March 18, 2020 from the president of the RV
9 Industry Association offering Vice-President Mike Pence 120 motorhomes for help in the fight
10 against COVID-19. This is a quote:

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12 “...the same RV units which provide temporary housing for recreation and camping
13 can also serve a critical role in times of national emergency. During times of
14 disaster, state and local agencies have used RVs to aid as local command centers,
15 portable offices, temporary housing, and other critical uses ... given concerns about
16 hospital capacity, we believe RVs can help by serving as temporary living quarters,
17 office and lab trailers, bathrooms and shower trailers, temporary quarantine units or
18 vending and kitchens.”
19

20 So exactly why can’t an RV be used for human habitation? I will tell you why. Because a poor
21 person is using it. A landless person. It’s all tied into the county tax base. Square footage of
22 homes supports the municipal government. Capitalism at one of its less-than-fine moments.
23 However the systemic use of ordinances, zoning and other roadway blockage as well as
24 criminalizing RV use after a certain hour citywide is (more than likely) unconstitutional. The
25 complete lack of RV parks for any socio-economic group indicates bias but when coupled with
26 intentionally no assistance to *impoverished* people who live in vehicles except for those selected for
27 the meat grinder known as the Vehicle Triage Center, where one must agree to (eventually) move
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2 into real housing. This entire case is going to revolve around the theory that this is ALL a violation
3 of the Unruh Act.
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5 I'm not living like an illegal person anymore. That's WHY I am on a hunger strike. I have been
6 made afraid by a hate-filled, belligerent, extreme-NIMBY group of my fellow citizens for WHAT I
7 am and the reason they feel they can openly act this way is because of the City allowing the
8 proliferation of these anti-RV laws. It's unconstitutional to prosecute or penalize me for WHAT I
9 am. What I am is a vehicle- dweller. Since April of 1971, SFPD ordinance 97-98 has criminalized
10 the vehicle-home in San Francisco. Up to a \$2000 fine and/or up to six months in county jail. The
11 current vogue is a SFMTA sign that outlaws "oversize vehicles". Both carry curfews, and a law
12 that has a curfew can be challenged. Additionally, the location where Mrs. Mayon is at the Great
13 Highway and she is already composing a letter to the California Coastal Commission that the signs
14 here on this particular stretch ignore their authority and are exclusionary to her class.
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16 Another way that counts against the City for a showing of how the City (and its residents) denies
17 the vehicle-dweller any semblance of dignity is on page 17 of Exhibit A of Mr. Goldman's
18 Declaration, which is the May 7, 2020 Public Health Order:
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20 J. For the purposes of this Order, "residences" include hotels, motels, shared rental
21 units, and similar facilities. Residences also include living structures and outdoor spaces
22 associated with those living structures, such as patios, porches, backyards, and front yards
23 that are only accessible to a single-family or household unit.
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25 The California State Constitution states that its citizens have the right to protect their property and
26 to "pursue and obtain safety, happiness and privacy." The last two are unattainable, but she will
27 avoid a congregant setting in order to aspire to the safety clause. Furthermore, there is no way that
28 offering up the Moscone Center as shelter would satisfy the requirements for *Martin v. Boise*

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3 Finally, plaintiff would like to point out the most hurtful she is discriminated against as a
4 vehicle-dweller (besides being criminalized at 10 pm every night, no RV parks in the county, no
5 facilities for RVs, no services - except Homeward Bound - for the impoverished RV dwellers,
6 mislabeled for the purposes of increasing federal and state grants, children and pets either taken for
7 living in an RV, or threatened, etc. etc. etc), the most painful discrimination found so far is that as a
8 disabled person on SSI, she is eligible for an In Home Healthcare Services (IHHS) worker and she
9 certainly needs one with her health issues. However, by the rules she is “homeless” and the only
10 one eligible to get money to care for her is a municipality or one of its sub-contractors. So long as
11 she lives in a park full-time, with utilities attached to the motorhome, in that set of circumstances
12 she may qualify for the privilege of picking out her own worker who is suitable for her lifestyle
13 choices, then being able to pay for that IHHS worker with state funds, like any other disabled
14 person. Do you know how much better her quality-of-life would be if she had regular, reliable help
15 to accomplish tasks once simple, now beyond her pain threshold? That only the City gets paid to
16 care for her, because it labeled her “homeless” is alone worthy of litigation.
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21 Respectfully,

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23 /s/ Ramona Mayon

Dated Jan 05, 2021

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PROOF OF SERVICE

I, Merlin Mayon, am above the age of 18 and I am not a party to this action. I hereby certify that on this 5th day of Jan, I served the foregoing *Declaration by Ramona Mayon* by causing it to be mailed to:

City Attorney's Office
1 Dr Carlton B Goodlet Plaza
San Francisco, California 94102

/s/ Merlin Mayon