

# **Systemic Procedural Failures and Private Prosecution Models in Sacramento Municipal Code Enforcement: A Comprehensive Analysis of Due Process Risks and Class Action Potential**

The structural integrity of municipal governance depends upon the equitable application of the law, yet the City of Sacramento's code enforcement apparatus has increasingly come under scrutiny for prioritizing revenue generation and administrative expediency over constitutional protections. This shift is most visible in the transition from traditional, compliance-oriented enforcement to a more aggressive, litigation-heavy model often facilitated by private legal firms. For the hundreds of homeowners in Sacramento who have faced "boilerplate" violation notices and the looming threat of receivership, the system represents a significant departure from the due process standards mandated by the Fourteenth Amendment. This report provides an exhaustive analysis of the mechanisms driving these procedural failures, the media and legal resources available to expose them, and the viability of a class action lawsuit aimed at restoring accountability to the capital city's enforcement practices.

## **The Evolution of the Municipal Police Power and the Rise of "Prosecution-for-Profit"**

The enforcement of local codes is a core function of the municipal "police power," a constitutional grant that allows local governments to regulate private conduct for the sake of public health and safety. In Sacramento, the management of this power has undergone a profound transformation. Historically, code enforcement was an administrative process handled by city inspectors and staff attorneys within the City Attorney's Office, with the primary goal being the correction of hazardous conditions. However, the emergence of a "cost-neutral" or "revenue-producing" model has fundamentally altered these incentives.<sup>1</sup>

Central to this transformation is the involvement of third-party law firms such as Silver & Wright LLP, which have successfully pitched cities on the idea of making code enforcement a self-funding enterprise. These firms advocate for amendments to municipal codes that expand the definition of "nuisance abatement" to include not only the physical cost of cleaning a property but also the full legal and administrative costs of prosecution.<sup>1</sup> When a city adopts this model, the financial burden shifts entirely to the homeowner, often resulting in legal bills that dwarf the initial statutory fines. In Sacramento, this trend is corroborated by investigative findings showing that since 2010, the city has filed lawsuits against 94 property owners for

violations described as "public nuisance" or "general blight," including a surge of receivership petitions during the COVID-19 pandemic.<sup>2</sup>

## Comparative Framework of Enforcement Objectives

Feature	Traditional Compliance Model	Revenue-Producing Private Model
<b>Primary Metric</b>	Number of hazards abated or corrected	Total costs recovered and legal fees billed
<b>Notice Specificity</b>	Detailed, individualized corrective orders	Standardized, boilerplate legal templates
<b>Resolution Method</b>	Mediation, education, and staff warnings	Criminal prosecution and civil receiverships
<b>Prosecutorial Staff</b>	Salaried city employees	Hourly-billing third-party law firms
<b>Incentive Alignment</b>	Resolving cases quickly to save city money	Prolonging litigation to maximize billable hours

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The "cost-neutral" pitch is particularly seductive to municipal administrators. By hiring firms like Silver & Wright—who maintain a significant presence in Sacramento through partners like James D. Maynard—cities can engage in high-volume litigation without drawing from the general fund.<sup>4</sup> However, this model creates a perverse incentive: the more complex and litigious an enforcement action becomes, the more revenue is generated for the firm, and the more "cost-neutral" the department appears to the city council. This dynamic often leaves homeowners, particularly those who are elderly or low-income, trapped in a cycle of debt that can lead to the loss of their primary asset.

## Systemic Procedural Failures: The Crisis of Boilerplate Notification

A cornerstone of procedural due process is the requirement that the government provide "notice and an opportunity to be heard" before depriving a citizen of property. For a notice to be constitutionally adequate, it must be specific enough to allow the recipient to understand

the charges and prepare a defense. The systemic use of "boilerplate" violation notices in Sacramento represents a critical failure in this regard.<sup>6</sup> These notices often cite broad, vague chapters of the municipal code—such as "substandard housing" or "public nuisance"—without identifying the specific physical defects or conditions that triggered the enforcement action.<sup>2</sup>

The legal implications of such vagueness are significant. Recent rulings, including the California Supreme Court’s decision in *City of Gilroy v. Law Foundation of Silicon Valley*, have clarified that public agencies can be held liable for the way they process requests and issue responses, even if no disclosure is eventually required.<sup>6</sup> If an agency’s response is "untimely and boilerplate," it may face declaratory relief—a court order essentially invalidating its procedures.<sup>6</sup> In the context of code enforcement, a boilerplate notice that fails to provide factual specificity may be insufficient to trigger the homeowner’s obligation to comply, thereby undermining the city's legal standing in subsequent litigation.

## Identified Deficiencies in Sacramento Notice and Order (N&O) Procedures

Deficiency Type	Mechanism of Failure	Potential Legal Challenge
<b>Broad Citations</b>	Referencing entire code chapters (e.g., "General Blight")	Violation of Procedural Due Process <sup>2</sup>
<b>Lack of Specificity</b>	Omitting photos or inspector notes from the N&O	Failure of Adequate Notice <sup>8</sup>
<b>Standardized Fees</b>	Applying "prosecution fees" based on a boilerplate schedule	Excessive Fines Clause (8th Amendment) <sup>1</sup>
<b>Short Compliance Windows</b>	Giving 15-30 days to correct complex structural issues	Arbitrary and Capricious Enforcement <sup>3</sup>
<b>Opaque Appeal Instructions</b>	Failing to explain the difference between Writ and De Novo review	Denial of Meaningful Opportunity to be Heard <sup>11</sup>

This reliance on standardized forms is often exacerbated by "dragnet" enforcement strategies. In jurisdictions across California, municipalities have been caught using satellite imagery or drone footage to allege violations without conducting on-site investigations. A notable example involved a homeowner facing \$900,000 in fines for greenhouses that the county (Humboldt) alleged were for cannabis cultivation based on aerial images, when in reality they were used for growing vegetables.<sup>13</sup> Such "uninvestigated allegations" mirror the complaints heard in Sacramento, where broad designations of "blight" are applied to properties without the factual nuance required for a fair administrative hearing.<sup>2</sup>

## Media and Investigative Resources: Exposing Municipal Overreach

Exposing the systemic failures of the Sacramento code enforcement system requires a multi-pronged approach that leverages the city's robust investigative journalism ecosystem. Sacramento is home to several high-impact media outlets and journalists who specialize in government accountability and the defense of civil rights.

### Primary Investigative Media Contacts and Outlets

The following table provides a directory of journalists and outlets with a proven track record of investigating municipal misconduct and regulatory failure in the Sacramento region.

Outlet	Investigative Lead	Contact / Specialty	Key Investigation / Precedent
<b>The Sacramento Bee</b>	Daniel Lempres	(916) 321-1056; Govt. Accountability	Investigation into 94 city lawsuits and receivership surge <sup>2</sup>
<b>The Sacramento Bee</b>	Ryan Sabalow	Environment & Investigative Reporter	Focus on systemic land-use and environmental enforcement <sup>15</sup>
<b>CalMatters</b>	Byrhonda Lyons	info@calmatters.org; Justice/Courts	Uncovered CHP asset forfeiture and court diversity issues <sup>17</sup>

<b>ABC10 News</b>	Brandon Rittiman	brittiman@abc10.com; "Originals" Team	"Fire-Power-Money" series on PG&E and state accountability <sup>19</sup>
<b>ABC10 News</b>	Chris Thomas	Identity theft and EDD whistleblower reports	Exposed systemic failures in state administrative agencies <sup>21</sup>
<b>KCRA 3</b>	Sarah Bohm-Alveraz	(916) 446-3333; "Investigates" Team	High-priority consumer and municipal fraud tips <sup>22</sup>
<b>CBS Sacramento</b>	Call Kurtis	Consumer Investigations Unit	Mediation and exposure of private-sector/govt collusion <sup>23</sup>

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The work of Brandon Rittiman and the ABC10 "Originals" team is particularly relevant. Their two-year investigation into Highlands Community Charter Schools revealed intentional misreporting of attendance and misuse of public funds, leading to a state audit and calls for legislative reform.<sup>25</sup> This demonstrate the effectiveness of the "whistleblower-to-media" pipeline: when employees of municipal agencies or affected residents provide specific evidence of wrongdoing, investigative journalists can amplify the issue to force institutional change. Similarly, The Sacramento Bee's "Equity Lab" provides a platform for examining how code enforcement disproportionately impacts communities of color and low-income neighborhoods.<sup>2</sup>

## Legal Resources and the Path to Class Action

For a class action lawsuit to succeed against the City of Sacramento, a legal team must demonstrate that the city's enforcement practices satisfy the requirements of numerosity, commonality, and typicality. The goal would be to prove that the hundreds of affected homeowners were subjected to the same unconstitutional "boilerplate" notice system and the same "prosecution-for-profit" fee structure.<sup>1</sup>

### Core Legal Principles for Class Certification (California Rule of Court 3.769)

1. **Numerosity:** The class must be so large that joining all members in a single suit is impracticable. In Sacramento, the Bee has identified at least 94 property owners in formal litigation, but the number of those receiving administrative citations and boilerplate notices likely reaches into the hundreds or thousands.<sup>2</sup>
2. **Commonality:** There must be questions of law or fact common to the class. A central common question would be: "Does the city's standardized violation notice violate the Due Process Clause by failing to provide factual specificity?".<sup>9</sup>
3. **Typicality:** The claims of the representative plaintiff must be typical of the class. This is easily established if the named plaintiff received a standardized notice and was billed "prosecution fees" according to the same municipal schedule as other class members.<sup>1</sup>
4. **Adequacy:** The representative parties must fairly and adequately protect the interests of the class.<sup>26</sup>

A critical precedent for this type of litigation is the *Morales v. City of Indio* case. The Institute for Justice (IJ) partnered with local residents to challenge Indio's use of Silver & Wright to prosecute minor code violations as criminal offenses.<sup>1</sup> The case revealed that the firm pitched its services as "cost-neutral" by charging defendants for the full cost of their own prosecution.<sup>1</sup> The settlement resulted in the city returning all prosecution fees to the affected residents and ending the practice.<sup>1</sup> Sacramento represents a similar opportunity for class-wide relief, potentially involving the recovery of millions of dollars in improperly assessed fees and the invalidation of boilerplate notices.

## Key Law Firms and Legal Advocacy Groups

Organization	Specialized Expertise	Relevant Experience
<b>Institute for Justice (IJ)</b>	Property Rights & Fines/Fees	Led the class action against Indio and Coachella <sup>1</sup>
<b>The Silverstein Law Firm</b>	Land Use and Due Process	Successfully sued the City of Los Angeles for due process violations <sup>29</sup>
<b>Serviam Law</b>	Code Enforcement Defense	Expertise in appealing administrative fines under GC 53069.4 <sup>11</sup>
<b>Legal Services of Northern CA</b>	Housing and Low-Income Advocacy	Provides direct defense for residents facing receivership <sup>31</sup>

<b>Disability Rights California</b>	Administrative Rights	Advocacy for residents with health issues targeted by code enforcement <sup>31</sup>
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## Institutional Oversight and the Civil Grand Jury

Beyond the judicial system, the Sacramento County Grand Jury serves as a vital tool for exposing systemic municipal failure. Unlike criminal grand juries, the civil grand jury acts as a "watchdog," inquiring into the "willful or corrupt misconduct of public officers" and investigating the management of public departments.<sup>33</sup>

The Grand Jury has the power to subpoena witnesses and documents, providing a mechanism to obtain internal city communications regarding code enforcement targets and contracts with private law firms.<sup>34</sup> A coordinated campaign of "Citizen Complaints" to the Grand Jury can trigger a formal investigation and a public report, which the city council would be legally required to address.<sup>33</sup>

### Procedure for Filing a Sacramento Grand Jury Complaint

Step	Action Required	Resource / Location
<b>1. Obtain Form</b>	Download the "Citizen Complaint Form"	<a href="http://sacgrandjury.org">sacgrandjury.org</a> or <a href="http://saccourt.ca.gov">saccourt.ca.gov</a> <sup>36</sup>
<b>2. Detail Allegations</b>	Describe the "systemic failure" or "boilerplate notice"	Must be clear and concise <sup>36</sup>
<b>3. Attach Evidence</b>	Include copies of N&O forms and fee invoices	Do not send original documents <sup>37</sup>
<b>4. Submission</b>	Mail in a sealed envelope to 720 9th Street	Room 611, Sacramento, CA 95814 <sup>36</sup>
<b>5. Confirmation</b>	Await written acknowledgment of receipt	Receipt is typically sent via mail <sup>37</sup>

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The Grand Jury’s recent reports, such as "No Equal Justice for Elder Financial Abuse" (2024-2025), demonstrate their focus on protecting vulnerable populations from institutional neglect.<sup>35</sup> A report focusing on the predatory nature of "cost-neutral" code enforcement would be a natural extension of this mandate.

## Whistleblower Mechanisms and Secure Information Sharing

For current or former city employees who wish to expose internal directives regarding "revenue-focused" enforcement or the intentional use of vague notices, the California Whistleblower Protection Act provides significant safeguards. The Act prohibits retaliation against any employee who reports "improper governmental activity," which includes actions that are economically wasteful, involve gross misconduct, or break state law.<sup>39</sup>

### Official Whistleblower Channels

Agency	Authority	Contact Information
<b>California State Auditor</b>	Confidential investigation of state/local waste	(800) 952-5665; <a href="http://auditor.ca.gov/hotline">auditor.ca.gov/hotline</a> <sup>39</sup>
<b>Sacramento District Attorney</b>	Criminal investigation of public misconduct	(916) 874-6218; Citizen Complaint Form <sup>38</sup>
<b>FPPC</b>	Ethics and transparency violations	(866) 275-3772; <a href="http://fppc.ca.gov">fppc.ca.gov</a> <sup>42</sup>
<b>Civil Rights Coordinator (DHA)</b>	Discrimination in municipal services	(916) 876-4455 <sup>43</sup>

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To facilitate the secure gathering of evidence for a class action, plaintiffs and whistleblowers can utilize specialized digital tools designed to maintain anonymity while allowing for the "matching" of common claims. Platforms such as **Psst.org** and **Whispli** allow individuals to deposit information about their cases in a "digital safe." These tools can identify when multiple people at the same organization (or multiple residents targeted by the same code section) are raising identical concerns, thereby overcoming the "first-mover" problem in exposing systemic abuse.<sup>44</sup>

# Administrative Adjudication: The Procedural Trap

A major hurdle for homeowners in Sacramento is the administrative hearing process. Before a resident can take their case to the Superior Court, they must typically go through an internal hearing where the city acts as both prosecutor and judge. These hearings are often presided over by Hearing Officers who are contracted by the city, creating a potential for bias.<sup>45</sup>

The rules of these hearings are often stacked against the resident. For instance, in many municipal codes, the city bears the burden of proof (by a preponderance of evidence) to show a violation occurred, but the *homeowner* bears the burden (by clear and convincing evidence) to show that the city's required corrective actions are unnecessary.<sup>47</sup> Furthermore, if a resident loses, they have a very narrow window (often 20 days) to file an appeal in Superior Court, and the standard of review is often "highly deferential" to the city's initial decision.<sup>11</sup>

## Success Rate and Litigation Statistics: The "One-Case" Anomaly

The Sacramento City Attorney's 2024-2025 Annual Report lists only one formal litigation case categorized under "Code Enforcement".<sup>48</sup> However, this figure is deceptive. It does not account for the hundreds of administrative hearings, the 12 "Lien" cases, or the 28 cases involving the Community Development Department.<sup>48</sup> This suggests that the vast majority of enforcement activity occurs in the "shadow" of administrative adjudication, where residents lack legal representation and the public lacks transparency.

Metric	FY 2024-2025 Statistics	Implication for Accountability
Total Litigation Cases	457	High overall city legal activity <sup>48</sup>
Official "Code Enforcement" Cases	1	Suggests enforcement is kept in admin hearings <sup>48</sup>
Writ Cases (Appeals)	4	Extremely low rate of residents challenging cities <sup>48</sup>
Lien Cases	12	Significant number of debt-collection actions <sup>48</sup>
Justice for Neighbors	\$20,789	Direct evidence of enforcement as a revenue

Revenue		stream <sup>48</sup>
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The disparity between the high number of "Public Works" (139) and "Police" (135) litigation cases and the single "Code Enforcement" case highlights a strategic choice by the city: by keeping code disputes in the administrative realm, the city avoids the more rigorous discovery and due process requirements of the Superior Court.<sup>48</sup>

## Toward a Systemic Solution: Strategy for Class Action and Reform

The data gathered suggests that the City of Sacramento has implemented a code enforcement system that is functionally "boilerplate" in its notification and "predatory" in its fee structure. For a class action to provide meaningful relief, it must target the *policy* of the city rather than individual instances of error.

### Strategic Recommendations for Affected Homeowners

1. **Demand Factual Specificity:** Homeowners should immediately respond to any "boilerplate" notice by filing a CPRA request for the inspector's notes, photos, and the specific factual basis for the citation. Failure by the city to provide this can be used as evidence of a due process violation.<sup>6</sup>
2. **Exhaust Administrative Remedies with Counsel:** Residents should avoid going into administrative hearings alone. The "clear and convincing" burden of proof on corrective actions is a trap that requires professional legal or expert testimony to overcome.<sup>30</sup>
3. **Coordinate through Media:** Utilizing the investigative contacts at The Sacramento Bee and ABC10 can bring public pressure to bear on the "Justice for Neighbors" program and its revenue-focused goals.<sup>2</sup>
4. **Leverage the Grand Jury:** A mass-filing of complaints regarding the use of "prosecution fees" could force a systemic audit of the City Attorney's Office and its contracts with private firms.<sup>34</sup>

The potential for a class action lawsuit involving hundreds of homeowners is high, provided that the focus remains on the city's standardized, "boilerplate" failure to provide constitutional notice. By combining the powers of investigative journalism, the Civil Grand Jury, and high-impact civil rights litigation, the residents of Sacramento can dismantle a system that has, for too long, treated their homes as revenue sources rather than sanctuaries. The shift toward a "cost-neutral" model must be countered by a return to a "due-process-first" model, where the objective of code enforcement is safety and compliance, not the accumulation of billable hours for private law firms.

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