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7 Attorneys for INTERVENERS AND REAL PARTIES
IN INTEREST LUNYEA WILLIS, DONNA ROSALIE
8 CARRANZA, KATHLEEN PAULO

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

11 CITY OF SANTA ANA, a charter City and)
12 municipal corporation, and THE PEOPLE)
OF THE STATE OF CALIFORNIA, by)
13 the City Attorney for the City of Santa)
Ana,)

14 Plaintiffs,)
15)
16)

16 vs.)

17 ORANGE COUNTY ASSOCIATION)
FOR MENTAL HEALTH DBA MENTAL)
18 HEALTH ASSOCIATION OF ORANGE)
COUNTY, a California Nonprofit)
19 Corporation; BT INVESTMENT)
PROPERTIES, LLC, a California Limited)
20 Liability Company; and DOES 1 through)
25 inclusive,)

21 Defendants.)
22)
23)
24)
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26)
27)
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CASE NO.: 30-2020-01124174-CU-MC-CJC

ASSIGNED FOR ALL PURPOSES TO:
Hon. John C. Gastelum
Department C11

DECLARATION OF LUNYEA WILLIS
IN SUPPORT OF MOTION TO
INTERVENE

Date: June 16, 2020
Time: 2:00 p.m.
Department: C11
Res ID: 73260042

Complaint Filed: January 13, 2020
Trial Date: None Set

DECLARATION OF LUNYEA WILLIS
IN SUPPORT OF MOTION TO INTERVENE

I. LUNYEA WILLIS, hereby declare and affirm as follows:

1. I make this declaration in support of this Motion to Intervene in the matter of *City of Santa Ana v. Orange County Association of Mental Health* (“MHA-OC”). If asked to testify at a hearing, I could and would testify truthfully and competently to the following based on personal knowledge.

2. I am a 39-year-old woman with disabilities who is experiencing homelessness. I am a sexual assault and sexual violence survivor. My disabilities include bipolar disorder, formerly known as manic depression, posttraumatic stress disorder, and dissociative identity disorder. These conditions stem from a history of trauma and abuse.

3. When I was a child, I was a victim of sex trafficking. Despite this, I was an athlete and on Honor Roll student. This juxtaposition made me feel like I was living a double life.

4. In 2007, my work led me to Orange County. I worked at several restaurants in Irvine and was making good money. Eventually, I went back and forth between Santa Ana and Chicago, Illinois. During this time, a man hurt me, and I became pregnant as a result of that assault. Experiencing sexual assault and violence once again was extremely painful, and again, my disabilities were aggravated. I decided to have the baby in Santa Ana because I consider Santa Ana my home and community.

5. After I gave birth, I had nowhere to go and was on the streets. Despite being homeless, I maintained a job at a grocery store chain called Sprouts. However, it was difficult working and being homeless at the same time. When you cannot shower regularly, something breaks down inside of you. Not being able to maintain a professional image and look clean shattered by confidence. I felt broken. I was selling people food all day, but I was hungry. Again, I felt like I was living a double life. My mental health disability symptoms were getting worse. One time, I thought I saw my attacker at the store, but it was just someone who looked like him. I knew I needed to get help, so in January 2020, I took a medical leave.

6. Because of my leave, I currently have no income and only receive food stamp benefits. At night, I stay at the Armory in Santa Ana or in a tent setting in Orange County.

7. A friend of mine saw what a hard time I was having and told me about a place I could get help.

1 That is how I found out about MHA-OC's service center on South Main Street. I was allowed in
2 because at the time, I was homeless and have diagnosed mental illnesses. I was made a member of the
3 Center and was eligible for mental health treatment and group therapy. The Center was recently closed
4 but when it was open, I went to the center seven days a week.

5 8. When I was visiting the center daily before its recent closure, I received a variety of services. I
6 searched and signed up for a lot of housing options and signed onto waitlists. I received employment
7 services, so that I can find a good job and afford rent. I showered, did laundry, received mail, and
8 charged my phone. I was also able to leave my belongings there during the day while I went on job
9 interviews and attended to other affairs.

10 9. The center also provided me mental health treatment through counselors and addiction services
11 through group therapy. This helped me manage my disabilities through services and a safe
12 community. The center is like home to me, a place with familiar faces where I feel safe and welcome
13 with a sense of community. The people there are like family, and I would often talk to them over
14 coffee. These relationships I have built through MHA-OC have helped my mental and emotional
15 health a lot. Because of the severe trauma I have gone through, having people to talk to can really help
16 manage my PTSD. The center gave me a sense of control and ability to control my environment,
17 which is also extremely important in managing my disabilities and maintaining my self-esteem. I have
18 come to rely on all the services the center has provided me.

19 10. Not having access to the center recently has been extremely hard on me mentally and
20 emotionally. Without the center, I am unable to shower, get regular meals, and speak to my counselors
21 and group members. It has been hard not being able to speak to my counselors and friends at the
22 center, and I feel so alone. Speaking with my group members regularly is important for my addiction.
23 It has also been difficult looking for jobs without the center's employment services. I have not been
24 able to look for affordable housing. I am still homeless and not having the center's services has made
25 homelessness even tougher. I do not know where else I can receive help like the help that MHA-OC
26 has given me.

27 11. Because MHA-OC is so important to my mental, physical, and emotional health, I wish to
28 intervene in this action. The outcome of this lawsuit would affect me and my ability to manage my

1 mental health disabilities.

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3 I declare under the penalty of perjury under the State of California that the foregoing is true and
4 corrected. Executed on this 6th day of April 2020, in Orange County, California.

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DocuSigned by:
Lunyea Willis
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LUNYEA WILLIS, declarant and proposed
9 intervenor

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