

HARASSED IN LA

A study of the barriers to implementing and enforcing the Tenant Anti-Harassment Ordinance in Los Angeles

A comprehensive project submitted in partial satisfaction of the
requirements for the degree Master of Urban and Regional Planning

Hannah Ouyachi

Acknowledgments and disclaimer

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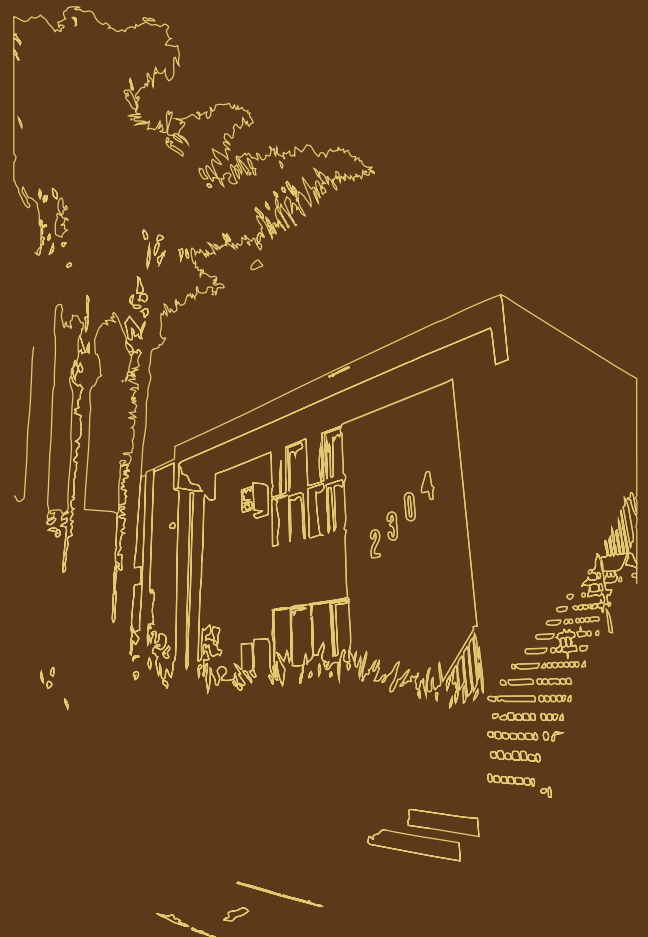


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EXECUTIVE

SUMMARY

Overview

Tenant harassment is an increasingly common feature of modern tenancy in Los Angeles, particularly for low-income tenants in rent-stabilized units, where landlords leverage harassment as a tool of profit-driven displacement.

In 2021, the City of Los Angeles passed the Tenant Anti-Harassment Ordinance (TAHO 1.0) prohibiting harassment and providing administrative and legal recourse for tenants. In 2024, it was amended (TAHO 2.0) to strengthen enforcement capacity, increasing incentives for private attorneys to take on TAHO cases. However, the enforcement process remains opaque. This report uses interviews with tenants, attorneys, representatives from community-based organizations, and city employees as well as analysis of Los Angeles Housing Department TAHO complaint data to assess enforcement, identifying barriers and surfacing opportunities.

This report outlines strengths and limitations of TAHO enforcement and details short-term, process-focused recommendations and longer-term, structurally-oriented recommendations to shift underlying dynamics that incentivize harassment.

Key findings

Strengths

On paper, TAHO offers meaningful protections for tenants, an expansive definition of harassment, and strong standing for tenants to sue their landlords. TAHO 2.0's amendments to guarantee attorney fees for prevailing parties in court has made taking TAHO cases substantially more viable for private attorneys, who are increasingly integrating TAHO into their cases. TAHO also provides fodder for tenant organizing against harassment.

Limitations and challenges

Legally, private attorneys and legal service providers do not have sufficient capacity to take on all TAHO cases they receive. While financial incentives enable more private attorneys to take TAHO cases, litigation is not a fit for all tenants or situations and typically takes years (while harassment is often acute and urgent), pointing to the importance of complementary bureaucratic recourse. In addition, as TAHO is still relatively nascent, there remains uncertainty and perceived risk in taking TAHO cases.

Administratively, LAHD's complaint process is complex, lacks transparency, and is generally not resulting in resolution for tenants or consequences for landlords. Cases are not reaching the appropriate body to issue citations or prosecute landlords. This may be due to internal cultural or operational barriers within the housing department.

Structurally, TAHO's enforcement mechanisms do not intervene in the urgency of harassment, and its construction does not address the systemic drivers of harassment, connections among issues of harassment, eviction and habitability, or underlying barriers to enforcement.

Investing in legal remedies for a problem as pervasive as harassment is insufficient. However, our administrative enforcement apparatus is, willfully or not, weighted against tenants. Thus, TAHO asks us to think more creatively and expansively about how we construct policy that recognizes and accounts for these challenges.

INTRODUCTION

I spoke to Sara on an unseasonably hot day in March. I've known Sara for about a year through the Los Angeles Tenants Union, where I've learned about the harassment, illegal eviction attempts, and negligence that Sara and her neighbors have been facing for more than two years, as well as their solidarity and mutual support in the face of these challenges. Sara explained that the harassment began when a new landlord bought her rent-stabilized building in 2024: "They buy a building and make it hell for everyone." Through intimidation, threats, removing the tenants' parking, and ongoing construction, including unbearable noise and frequent utility shut-offs, the landlord made these Koreatown tenants' lives miserable. Sara is confident about her rights as a tenant, and she has filed multiple harassment complaints with the city. She also contacted a lawyer. But without clarity on the status of her complaints or a clear legal route to stop the ongoing harassment, Sara moved out of her home. ***While Sara's experience may seem isolated, harassment is a method used by landlords to disturb and displace tenants all over Los Angeles.***

While it receives less attention than issues of eviction or housing unaffordability, tenant harassment is a pervasive and problematic feature of Los Angeles' rental housing market. Much more than interpersonal conflicts between landlords and tenants, in a profit-centered housing market fueled by gentrification, tenant harassment is an economic strategy employed by landlords to milk additional value from tenants and their homes. Through tactics like those that Sara experienced, harassment is often leveraged by landlords against vulnerable tenants to push them out of rent-stabilized units, then allowing landlords to raise the rent absent vacancy control (Minissians, n.d.; Tenant Harassment, n.d.). Landlord tactics run the gamut from more typical harassment (e.g., threats, assault) to pervasive neglect and illegal evictions.

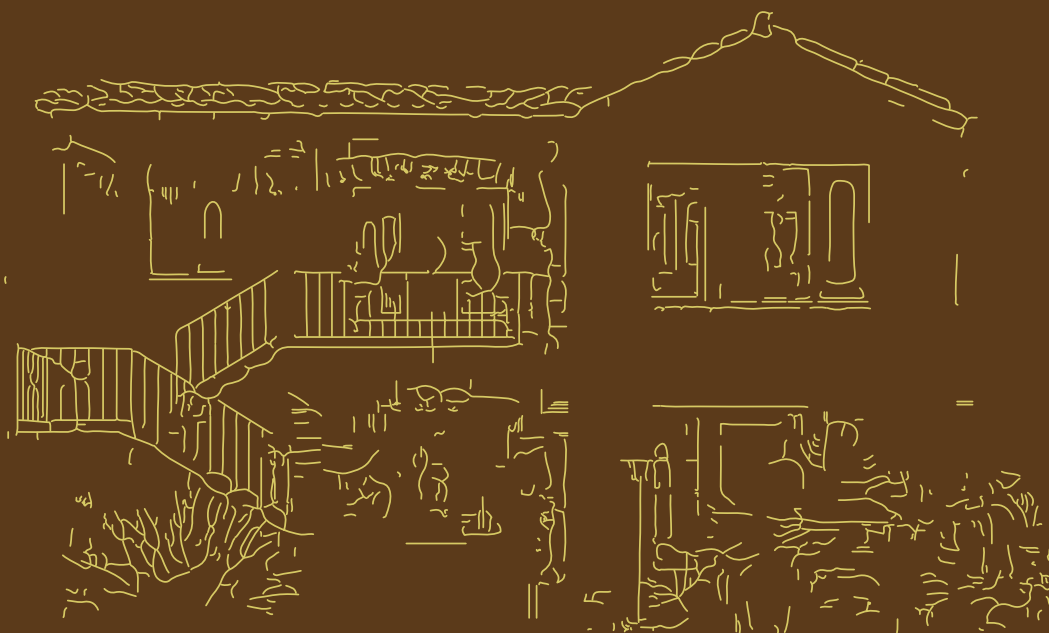
In response to these dynamics as well as mounting pressure from community-based organizations and tenants during the COVID-19 pandemic, in 2021, the City of Los Angeles passed the Tenant Anti-Harassment Ordinance (TAHO). TAHO prohibits tenant harassment, providing administrative recourse through the Los Angeles Housing Department (LAHD) and the City Attorney's Office (OCA) and offering grounds for tenants to sue their landlords. From 2021-2024, there were over 13,000 complaints filed with LAHD under the ordinance, indicating a pattern of harassment throughout the city, but only 23 (less than 0.2%) were referred to the City Attorney's Office to initiate cases for prosecution and only four resulted in citations (Esquivel, 2024; Mejia, 2025). In light of these enforcement challenges, highlighted by a City Controller report on the ordinance, TAHO was updated in late 2024 to increase incentives for attorneys to take TAHO cases on behalf of tenants, including guaranteed attorney fees and 3x damages for tenants who prevail in court. While these measures are intended to strengthen the ordinance's enforcement capacity, specifically around litigation against harassing landlords, it is still unclear as to whether the ordinance is equipping tenants and their advocates with stronger tools to enforce the ordinance, both through administrative and legal channels.

Without meaningful enforcement, tenants protections are protective in name only. While Sara filed multiple TAHO complaints with LAHD and contacted a lawyer (other tenants in her building are engaged in litigation against their landlord with no outcomes yet), absent tangible enforcement outcomes, harassment drove Sara out of her home. ***This report examines the TAHO enforcement process since the updated ordinance took effect to assess if and how TAHO is supporting tenants legally and bureaucratically, where it falls short, and why to ultimately offer recommendations to strengthen TAHO's enforcement process and better support Los Angeles' tenants.***

Research questions

Through interviews with tenants, attorneys, representatives from community-based organizations, and city employees as well as analysis of TAHO complaint data, this report explores the following research questions:

1. How do tenants, community-based organizations (CBOs), legal service providers (LSPs), private attorneys, and city employees **experience and understand the TAHO enforcement process**?
2. What are the major **organizational and institutional challenges to effective enforcement**?
3. Based on a clearer understanding of the organizational challenges faced by CBOs and LSPs, how can these organizations **better support tenants** in leveraging TAHO to address harassment?



Useful acronyms

TAHO: Tenant Anti-Harassment Ordinance

LAHD: Los Angeles Housing Department

OCA: Office of the City Attorney

SAJE: Strategic Actions for A Just Economy

RSO: Rent Stabilization Ordinance

LSPs: Legal Service Providers

CBOs: Community-Based Organizations

REAP: Rent Escrow Account Program

METHODOLOGY

This report takes a primarily qualitative approach to understanding and assessing the TAHO enforcement process. It begins with a ***review of academic and gray literature*** to understand and contextualize tenant harassment, the strengths and limitations of existing policy interventions, and the emergence of Los Angeles' Tenant Anti-Harassment Ordinance. It leverages ***qualitative and quantitative data from the Los Angeles Housing Department (LAHD)*** on TAHO complaints from May 2024 to September 2025 to provide an overview of the TAHO enforcement landscape and begin to assess shortcomings.

Analysis of TAHO complaint data includes a spatial analysis of TAHO complaints overlaid with key demographic and housing data from LA County, LA City, and Census data using GIS software. This provides insight into the geographic distribution of TAHO complaints and how they interact with other indicators of tenant vulnerability. In addition, this study employs descriptive analysis of TAHO complaint data to uncover patterns in the complaint process across status, resolution time, and harassment type.

In addition, the report details ***findings from 31 semi-structured, in-depth interviews with tenants, private attorneys and LSPs, representatives from CBOs, and city employees.*** These interviews are intended to provide insight into the TAHO enforcement process from different perspectives to ultimately uncover major organizational and institutional challenges to enforcement and surface recommendations.

Interviews were conducted from December 2025 to May 2026 both in-person and virtually. Interviewees were recruited through existing organizational connections and snowball sampling. While there is not a specific profile or requirements for eligibility, all interviewees had experience with TAHO in some capacity. All tenants had experience with harassment and filing TAHO complaints through LAHD, some were engaged in litigation related to harassment. Representatives from CBOs were involved in advocacy to pass TAHO and/or contracted by the city to support tenants in navigating the TAHO complaint process, offering perspectives on the emergence and evolution of the ordinance

and opportunities and challenges in supporting tenants. Lawyers – both LSPs and private attorneys – have incorporated TAHO into their cases, providing insight into when the legal enforcement process does and does not offer meaningful recourse for tenants experiencing harassment. Finally, city employees involved in TAHO-specific enforcement roles shared perspectives on the enforcement process within a large, established bureaucracy. Each of these stakeholder groups provides a unique angle from which to understand the opportunities and challenges of TAHO enforcement. Participants reflect a diverse sample across gender and race.

Each interview was semi-structured, using interview guides, and lasted 30 to 60 minutes. After receiving feedback from tenants, five tenants were compensated for their time with \$50 gift cards.

Interviewees

9 tenants who experienced harassment and filed TAHO complaints

7 representatives from community-based organizations (CBOs)

8 attorneys from legal service providers (LSPs) and 1 paralegal

4 private attorneys

2 city representatives

Three interviews were conducted in Spanish with interpretation by colleagues at SAJE. For data analysis, I transcribed interviews, and then summarized using reflexive thematic analysis to uncover themes and patterns. I've included quotes from interviews throughout the report, some of which have been condensed or slightly adjusted for clarity. Changes do not impact the substance of the quote. Names have been changed for interviewee confidentiality.

Limitations

While these methods allowed me to glean meaningful insight into the TAHO enforcement process, there are a few limitations to note. This study interviewed tenants who submitted TAHO complaints, and thus does not cover why some tenants who are experiencing harassment may not file complaints. Further, tenants interviewed had touchpoints with membership-based organizations like SAJE and the Los Angeles Tenants Union – by nature of being involved in these organizations, this pool of tenants may not be wholly representative of the broader tenant population. Similarly, CBO representatives and LSPs are working at advocacy and public service-oriented organizations engaged in TAHO-related work. These interviewees provided an informed perspective on TAHO but, as all interviewees do, may bring their political biases to the table. Finally, interviews with city employees were limited given their reluctance to respond for comment. Without substantial input from city employees, this analysis cannot offer a comprehensive internal picture of administrative enforcement. It is limited to a largely external perspective on TAHO enforcement and can only hypothesize as to the internal challenges that city agencies may be facing in working to enforce TAHO.

Further, obtaining TAHO complaint data from LAHD was challenging and resulted in a somewhat piecemeal approach to collecting and aggregating data, which was provided in two separate datasets with distinct fields. Additional limitations of the LAHD TAHO complaint data are discussed in the Appendix. The difficulty in securing comment and data from LAHD posed challenges for this research and is itself instructive– it may suggest internal inefficiencies or operational challenges and/or a stance of closure or defensiveness towards an assessment of enforcement.

PART I

Contextualizing tenant harassment

Despite its pervasiveness, scholarly literature on tenant harassment is relatively limited, though writings by scholar-activists are more common. As harassment is intertwined with issues of eviction, habitability, gentrification, and displacement, it is often examined with a broader lens that considers housing market dynamics and tenant-landlord relationships more generally. This section examines peer-reviewed literature across geography, urban studies, sociology, housing, and law journals as well as writings by scholar-activists (e.g., conference papers, magazine articles), news articles, and city reports and documentation, identifying three primary areas of exploration related to tenant harassment – (1) efforts to legislate tenant harassment – both early efforts through the concept of constructive eviction and more recent policies targeting harassment directly, (2) the impact of housing market dynamics on landlord behavior, including patterns of harassment, neglect, and eviction, (3) limitations of forums for tenant complaint related to issues of harassment, eviction, and habitability.

This literature review is structured as follows:

- a. Early efforts to legislate harassment in court through constructive eviction
- b. Economic and political dynamics that create incentives for harassment today
 - iii. What do these dynamics look like in practice?
- c. Combatting tenant harassment through policy and organizing
 - i. Recent efforts legislating tenant harassment outside of Los Angeles
 - ii. Challenges and “justice blockers” to effective enforcement

Throughout this section, harassment is explored alongside and through issues of habitability, neglect, and eviction. As this report will show, harassment is a strategy employed by landlords to push tenants out of their homes and may result in illegal or “self-help” evictions. Harassment can take many forms – ranging from intimidation, assault, and threats (what we might typically think of as harassment) to persistent neglect and failure to address habitability issues. Harassment and neglect can be understood as two sides of the same coin – neglect is used to cut costs when landlords cannot increase rent due to lack of demand, neighborhood dynamics, or policy and to make tenants’ homes so unlivable that they leave. Other forms of harassment are also used to drive tenant turnover, allowing landlords to raise the rent in rent-stabilized units, and to compel desired behavior by tenants (Angst et al., 2025; Greif 2018). Together, harassment, neglect and habitability issues, and eviction function as levers of landlord power in an unequal housing market.

Early efforts to legislate harassment in court through constructive eviction

Until recently, efforts to legislate tenant harassment took place in court and centered on tenant possession, asking: did landlord action or inaction lead the tenant to abandon their unit? If so, the harassment amounted to a constructive eviction,¹ and tenants could cease

1 Dyett v. Pendleton, an 1826 New York state case, established the concept of constructive eviction. The defendant, a New York City tenant, argued that he was forced to leave his apartment because the landlord was bringing sex workers into the building, disturbing the tenant with the noise. While the lower court ruled in favor of the landlord, on appeal the decision was overturned. Under the covenant of quiet enjoyment, if a tenant was disturbed by their landlord’s actions and therefore left the apartment, they were no longer responsible for rent payment and could sue the landlord for damages. However, if a tenant was still in possession of their unit, it did not amount to a constructive eviction, and the tenant had little recourse (Lloyd, 1931).

paying rent and seek recourse in court. However, if a tenant remained in their home, they were still responsible for paying rent and were without meaningful bureaucratic or legal recourse (Lloyd, 1931; Rapacz, 1951; Quinn & Phillips, 1969). These legal scholars illustrate that, while the concept of constructive eviction was fundamental to the process of codifying reciprocal rights between tenants and landlords, the centrality of tenant possession placed tenants in a bind—lose your housing or lose your peace.

While many contemporary efforts to legislate tenant harassment have moved beyond a focus on possession, offering recourse for tenants who choose to stay or to leave, and expanded avenues for remediation beyond the courts, this early discourse on the landlord-tenant relationship continues to be instructive. Landlords persistently act in ways that undermine tenant enjoyment, habitability, and safety, often with the intent of facilitating a constructive eviction, necessitating new methods for recourse and enforcement.

Over time, legislating harassment has become more complex—harassment is embedded within broader economic and political dynamics that are shaping the housing market.

Economic and political dynamics that create incentives for harassment today

Tenant harassment today is, in many ways, an outgrowth of a rental housing market that produces financial incentives for landlords to drive tenant turnover, raising rents and increasing profits. Whether or not it results in a constructive eviction, harassment often intends to make conditions so unlivable that tenants self-evict, or in the case of negligence, reduce the landlord's maintenance costs (Angst et al., 2025; Appel et al., 2024; Ferrer, 2021).

Today, many scholars and activists situate harassment within a broader political and economic context, identifying gentrification (rising rents, displacement pressures) and financialization of rental housing as drivers— they assert that

harassment is a product of the commodification of rental housing and concentration of corporate ownership of housing, where many landlords see their properties not as homes but as opportunities to extract profit from tenants, often those in gentrifying markets (Angotti, 1999; Ferrer, 2021; Appel et al., 2024; Gustavussen, 2025c). These dynamics impact harassment in two key ways: (1) housing as an asset and investment magnifies the profit-imperative of landlording, which is exacerbated by gentrification, leading to incentives that are bad for tenants (e.g., harassment to drive turnover/evictions and increase profit), and (2) vehicles for corporate ownership allow landlords to deploy predatory practices with limited consequences or accountability.

While landlording has always been a business, as land and real estate are increasingly leveraged as assets, many landlords, large and small alike, aren't just trying to get the rent, they are trying to extract as much profit as possible from their investments. Where rents are rising, particularly in gentrifying neighborhoods and tight real estate markets, landlords are incentivized to use harassment to push out low-income and rent-stabilized tenants, resulting in cycles of harassment, eviction and displacement, and gentrification with outsized impacts on tenants of color (Appel et al., 2024; Ferrer, 2021; Gustavussen, 2025c). Not only are these practices profitable for landlords, they are part and parcel of financial capitalism: given the "growing centrality of urban real estate to capital's global growth strategy" (Stein, 2019, p.2), pushing low-income tenants and tenants in rent-stabilized units out of the center city allows for rising rents, capital influx, and, ultimately, gentrification, satisfying capitalism's expansionist tendencies (Appel et al., 2024; Ferrer, 2021; Gustavussen, 2025c; Kurwa, 2025; Stein, 2019).

In conjunction with the financialization of rental housing, the rise in corporate ownership of rental housing, which has accelerated since the 2008 financial crisis, may further incentivize harassment (Appel et al., 2024; Ferrer, 2021; Ferrer, 2025; Gustavussen, 2025c). Today, Blackstone is the world's largest landlord, and in Los Angeles, corporate entities own 67% of rental housing (Ash, 2023; Ferrer, 2021). This concentration of ownership has direct consequences for tenants— corporate ownership structures are linked to predatory practices, including

harassment, serial and illegal evictions, and neglect (Ferrer, 2021; Ferrer, 2025; Gustavussen, 2025c). In “Leveraging the collective: Contesting California’s corporate landlords through multibuilding organising” (2025c), a fieldwork-based exploration of tenant organizing in Los Angeles and San Francisco, Gustavussen argues that tenant harassment, along with extractive rents and serial eviction filings, “occur systematically in the corporate landlord structure as a deliberate and methodical tactic to expedite profit maximisation via displacement” (p.3135). Similarly, in his exploration of corporate landlords in Los Angeles, Ferrer, a scholar-activist writing for SAJE, uncovers a persistent pattern of predatory behavior by corporate landlords, who profit through negligence (e.g., ignoring citations, minimizing repair and maintenance costs) and unlawful evictions, both forms of harassment. In the context of rising property values, many corporate landlords adopt eviction as a “tool of first resort” to remove existing tenants in rent-stabilized units and charge market rate rent (Ferrer, 2021, p.45). Ferrer’s 2025 article, “Corporate practices of racial banishment in Los Angeles,” expands on these findings, identifying the centrality of corporate landlords in driving post-pandemic patterns of eviction that disproportionately impact Black tenants (Ferrer, 2025). In addition, the use of investment vehicles (e.g., LLCs, LPs), a common practice among corporate landlords, obfuscates ownership and insulates landlords from accountability, enabling harassment with fewer consequences (Ferrer, 2021; Gustavussen, 2025c). These practices have racialized impacts—Los Angeles’ tenants are disproportionately Latinx and Black, and corporate rental housing ownership in Los Angeles has steadily increased in more vulnerable neighborhoods with more Black, brown, and Asian tenants (Dreier, 2023; Graziani et al., 2020).

Municipal policy can accelerate or thwart these trends. Los Angeles’ lack of vacancy control incentivizes harassment as an economic strategy to push out tenants in rent-stabilized units. The Rent Stabilization Ordinance (RSO) limits rent increases to 1-4% per year² for buildings with 2+ units built before 1978 (Los Angeles Housing Department, 2026). However, under the Costa Hawkins Rental Housing Act, landlords can reset rent-stabilized units to market rate after a tenant moves out,

² Starting in July 2026, allowable rent increases will be reduced to 1-3%

incentivizing landlords to remove RSO tenants (Costa-Hawkins Rental Housing Act, 1996). Further, under the RSO, landlords can offer tenants voluntary vacate agreements, where they pay tenants to leave, but tenants have the right to refuse these offers (Los Angeles Housing Department, 2025b). The K3 Tenant Council, a collective of over a dozen tenant associations in Los Angeles fighting a shared predatory landlord, asserts that vacancy decontrol under Costa Hawkins, “is a foundational feature that makes rent stabilization in its current form palatable to speculative real estate interests” (“Resisting Social Cleansing in Los Angeles...” The Unhousing Dept. section). In “Legislating corporate landlords: A comparative analysis of recent interventions in Los Angeles and San Francisco” (2025b), Gustavussen explains that vacancy decontrol “has helped motivate a focus on rent-stabilised properties among institutional investors as ‘underperforming assets,’” driving displacement of long-term tenants through tactics such as harassment and illegal evictions (p.374). These ownership trends are visible in Los Angeles, as corporate ownership of RSO units is steadily increasing, according to a 2025 Los Angeles Housing Department report (Spiegel & Montano, 2025). In addition, the Ellis Act allows landlords to evict tenants from rent-stabilized units if they intend to perform major renovations or remove the unit from the rental market (Ellis Act, 2006). Landlords often employ the Ellis Act to convert rent-stabilized properties into condos that can be rented at market rate (Gustavussen, 2025b). The macrolevel economic and political context and California’s specific policy landscape influence landlord behavior, incentivizing harassment, eviction, and neglect.

What do these dynamics look like in practice?

“Landlords respond in illegal ways when frictions in the market make it difficult to simply increase rents in response to strengthening market conditions,” Angst et al. conclude in their 2025 study of market dynamics and landlord harassment and neglect in Central and South Los Angeles. (Angst et al., 2025, p.2175). Specifically, the authors find that one-quarter of households surveyed reported inadequate maintenance in the last two years, and over one-fifth reported at least one form of harassment.

They connect these conditions to landlord profit motivation, as tenants in rent-stabilized buildings and in gentrifying census tracts were more likely to experience harassment, including illegal eviction practices, threats, and assault (Angst et al., 2025).

A case study of a notoriously predatory Los Angeles landlord, Alpine LA Properties (also known as K3 Holdings), brings these dynamics to life. As part of their organizing efforts against Alpine LA, the K3 Tenant Council detailed Alpine LA's predatory practices. Throughout 2019 and 2020, Alpine LA purchased buildings across the city, most of which were under the RSO, ostensibly with the intent of removing existing tenants and renting the units at market rate.³ In those two years, Alpine LA bought out 166 units across ten buildings with voluntary vacate agreements, colloquially known as cash for keys offers. While these tactics were common across buildings, at one particular building, 240 S Avenue 55 in Highland Park, a gentrifying neighborhood in Northeast Los Angeles, the company attempted to coerce and force tenants into accepting the offers through verbal abuse, threats, including threatening to call Immigration & Customs Enforcement, issuing false three-day notices to vacate, and conducting illegal construction in vacant units ("Resisting Social Cleansing in Los Angeles..."). "In perhaps the single most violent case, the crew demolished a longtime Latinx family's bathroom, supposedly to fix a leaking pipe, then refused to patch the walls for months, leaving the room so exposed to the elements that swarms of roaches and families of rats invaded the apartment" ("Resisting Social Cleansing in Los Angeles..." Hell on Earth section).

In addition to market dynamics, municipal policies impact landlord behavior towards tenants—policies that seek to sanction landlords, such as nuisance ordinances and water bills, ultimately sanction tenants, leading landlords to harass tenants or neglect their units. Through interviews and observations with landlords in Cleveland, Ohio, in "Regulating Landlords: Unintended Consequences for Poor Tenants" (2018), Meredith Greif finds that, because landlords need their tenants to act—by

reducing water use or limiting noise, trash, etc.—in order to avoid penalties, landlords may take aggressive action towards tenants, such as verbal or physical assault, threats, surveillance, and eviction. While still financially-driven and intended to compel tenants to act in a certain way, rather than primarily being a vehicle for eviction, harassment is a method to ensure tenant compliance with municipal policies. In other cases, landlords may respond by stopping maintenance to cut costs, leading to disrepair (Greif, 2018). Instead of the potential for financial gain, here the potential financial loss leads landlords to harass.

³ At 240 S Avenue 55, Alpine LA Properties paid over \$10M for the property, which would not be a sound investment assuming tenants continued to pay their rent-stabilized rents from the time of purchase. However, if Alpine LA could charge market rate rent, the \$10M sum would be a steal ("Resisting Social Cleansing in Los Angeles..." The Unhousing Dept. section).

Policy interventions

to combat tenant harassment

Recent efforts legislating tenant harassment outside of Los Angeles

Municipalities across California and major cities, such as New York, have instituted policies regulating harassment. The table below summarizes a subset of these policies. West Hollywood, Santa Monica, and Berkeley also have anti-harassment legislation but are not covered below. While this is not a comprehensive list of tenant anti-harassment policies in U.S. municipalities, it offers a snapshot of how other municipalities have worked to legislate tenant harassment.

Broadly, these policies define harassment in similar terms, focused on landlord bad faith conduct. Some policies, notably Oakland's Tenant Protection Ordinance, offer a more expansive interpretation of bad faith conduct. While most of these policies offer both administrative and legal recourse (tenants and the city can sue landlords), enforcement takes different forms. New York City is a notable example of more proactive administrative enforcement alongside litigation and tenant complaints. In addition to anti-harassment policies, many municipalities have passed related tenant protections that seek to regulate predatory landlord behaviors that occur alongside harassment.

City	Policy	Description	Strengths & limitations
New York City	Amendment to Administrative Code; Tenant Protection Act 2008	<p>Defines and prohibits tenant harassment; narrower definition centered on acts or omissions that cause or are intended to cause a tenant to vacate or waive rights related to occupancy</p> <p>Enforcement mechanisms:</p> <ul style="list-style-type: none"> Tenants file complaints for Housing Part case in NYC Housing Court; may result in injunctive orders, orders to repair or restore, civil penalties (examples of penalties up to \$300,000 in habitability cases) <ul style="list-style-type: none"> Housing and Preservation Department investigates tenant complaints, issues violations, and can sue landlord in Housing Court Includes proactive investigation of buildings with chronic harassment and habitability violations by 8-person NYC Anti-Harassment Unit and joint city-state Tenant Harassment Prevention Task Force Criminal and civil litigation Requires landlords to apply for a certificate of no harassment to file for building permits Violating landlords' information posted on city website (Housing Maintenance Code, 2008; HPD's Anti-Harassment Unit..., 2020; Anti-Harassment Unit Cracks Down..., 2020; Tenant Harassment Prevention Task Force; n.d.) 	<p>Proactive targeting of bad landlords with a dedicated team</p> <p>Suggests more connectivity across enforcement for habitability issues and harassment</p> <p>Additional methods to hold landlords accountable beyond financial penalties</p> <p>Narrower definition of harassment</p>

City	Policy	Description	Strengths & limitations
San Francisco	Proposition M 2008	<p>Broadly defines and prohibits tenant harassment (e.g., bad faith conduct)</p> <p>Enforcement mechanisms:</p> <ul style="list-style-type: none"> Tenants may petition Rent Board for rent reduction Civil and criminal enforcement (all violations classified as misdemeanor) through litigation by tenants or the city (Proposition M, 2008) 	<p>Additional financial consequences for landlords through rent reductions, though unclear how often this works for tenants</p> <p>No administrative agency responsible for enforcement; tenants' primary avenues for recourse are rent reductions and litigation</p>
Oakland	Tenant Protection Ordinance 2014	<p>Broadly defines and prohibits tenant harassment (e.g., bad faith conduct)</p> <p>Enforcement mechanisms:</p> <ul style="list-style-type: none"> Civil enforcement through litigation by tenants and the Oakland City Attorney's Office (penalties of \$1,000 per day per violation and/or administrative citations) <ul style="list-style-type: none"> City Attorney's Office Neighborhood Law Corps does affirmative litigation for harassment cases affecting multiple tenants (5 dedicated attorneys); feature City Attorney cases in partnership with CBOs that resulted in settlements of over \$1M Tenants may petition Rent Board for rent reduction for unlawful rent increases or reduction of services (Tenant Protection Ordinance, 2020; Cases, n.d.; Attorneys, n.d.) 	<p>No definition of bad faith specified, offering space for expansive interpretation</p> <p>Dedicated team in OCA focused on affirmative litigation for harassment</p> <p>Seems to only go after the worst landlords (large building cases), so individual tenants can only secure recourse through independent civil litigation or rent reductions</p> <p>Additional financial consequences for landlords through rent reductions, though unclear how often this works for tenants</p>
Selected Supporting Policies			
San Francisco	Union at Home 2022	<p>Protects tenants' right to organize, including certifying a tenant association, and requires landlords to attend meetings and negotiate in good faith; enforced through rent reductions for noncompliance - tenants petition rent board for rent reduction (Union at Home, 2022)</p>	<p>Increases tenant power in negotiating with landlords</p> <p>May offer recourse for tenants to address harassment directly with landlords rather than through administrative or legal processes</p> <p>Unclear how effective rent reductions are in practice</p>
Oakland	Tenant Move Out Agreement Ordinance 2018	<p>Regulates cash for keys and coerced evictions by codifying tenant's rights in relation to move-out and mandating that landlords take specific steps before a tenant vacates. Enforced through administrative penalties, Rent Board petitions, and civil litigation (Tenant Move Out Agreement Ordinance, 2018)</p>	<p>Offers additional protections for illegal evictions, which may help to disincentivize harassment</p>

Challenges and “justice blockers” to effective enforcement

While these policies seek to build the infrastructure to prevent and penalize tenant harassment, assessing their efficacy in practice is more challenging. Many of these policies expand tenant recourse beyond the courts, offering administrative channels for tenants to lodge harassment-specific complaints. Prior to the implementation of these policies, tenants did not have a forum to air and address standalone issues of harassment. However, scholars suggest that, on a practical level, these policies are often underfunded and understaffed, and on a political level, they face and typically fail to address underlying structural barriers (Appel et al. 2024; Bartram, 2022; Chisolm et al., 2020; Quinn & Phillips, 1969).

Tenant protections generally rely on tenant reporting or tenant-initiated litigation and continue to center individual landlord-tenant relationships, failing to account for structural conditions that motivate harassment, eviction, and neglect or uneven power dynamics between landlords and tenants (Chisolm et al., 2020; Appel et al., 2024). In “Tenants’ Responses to Substandard Housing: Hidden and Invisible Power and the Failure of Rental Housing Regulation” (2020), Chisolm et al. leverage qualitative research to explore how landlord power influences if and how tenants seek recourse. Most fundamentally, landlords have control over tenants’ housing. However, landlord power operates in more subtle ways, informing tenants’ beliefs around the efficacy of reporting or raising issues, potential consequences of reporting, and even their understanding of what constitutes a reasonable grievance (Chisolm et al., 2020). As systems for regulating landlord practices are often at the level of an individual contract, unit or rental building and are “incumbent on an individual tenant seeking administrative or judicial recourse,” these uneven power dynamics undermine the efficacy of tenant protections that require self-reporting (Appel et al., 2024, p.1986; Chisolm et al., 2020). Further, investigations typically take place around a single complaint and rarely identify or acknowledge patterns of landlords consistently violating regulations (Appel et al., 2024).

Like the structure of municipal policy, those who are tasked with enforcement have outsized influence on its implementation and impact. Building inspectors, as they review evidence, document violations, and make decisions about reporting and punishment, exercise significant discretion in mediating landlord-tenant relationships and meting out consequences (Bartram, 2022). Depending on institutional culture, political beliefs, internalized prejudices and more, this discretion can either promote or prevent enforcement of tenant protections. Robin Bartram’s ethnographic study of building inspector behavior in Chicago, *Stacked Decks* (2022), illustrates how subjective interpretations of power and justice inform uneven enforcement of building codes and tenant protections. In the case of Chicago building inspectors, many of whom are from the same working class neighborhoods they typically inspect, Bartram finds that they tend to favor the underdog—exercising more leniency towards small landlords that are struggling financially and imposing harsher consequences on large, profit-maximizing landlords without excuses for negligence or habitability issues (Bartram, 2022).

Together, the structural conditions that incentivize harassment and the inhibitors of effective policy – from real estate investment to power dynamics to the structure of municipal policy and enforcement – can be considered “justice blockers” (Bartram, 2022), or cards in the deck stacked against effectively addressing and regulating tenant harassment: “laws and regulations are often limited in their ability to counteract inequality precisely because they are neutral, whereas the people on whom enforcement acts occupy different positions and have disparate access to resources. Those with status and wealth can evade the costs and burdens of enforcement, and those without cannot” (Bartram, 2022, p.144).

PART II

A case study of LA's TAHO

Understanding TAHO: origins, assets, and limitations

In Los Angeles, pressure to legislate tenant harassment had been mounting since 2018, when the Los Angeles Housing and Community Investment Department published a report recommending the adoption of an anti-harassment ordinance (Acevedo et al., 2018). These pressures came to a head during the COVID-19 pandemic, when harassment became seemingly more pervasive and egregious, employed by landlords as a method to circumvent pandemic tenant protections. In response to tenants and community-based organizations both within and outside the Keep LA Housed Coalition calling for protections against harassment, Los Angeles passed the Tenant Anti-Harassment Ordinance in 2021 (TAHO 1.0). In "Emergency Urbanism," scholar-activist Ananya Roy describes how the COVID-19 pandemic created an acute state of emergency in Los Angeles, which, alongside the ongoing state of emergency of racial capitalism, opened the door for a more expansive use of government authority in favor of tenants and working people, which she deems "the capacious imaginations of emergency urbanism" (Roy, 2018, para. 15). While many pandemic-era tenant protections did not last, TAHO did, codifying more durable rights for tenants experiencing harassment.

The ordinance intends to "prohibit and deter tenant harassment" ("Tenant Anti-Harassment Ordinance I"), and exists within a broader patchwork of tenant protections alluded to throughout this report, including the Rent Stabilization Ordinance (RSO), Tenants' Right to Counsel (RTC), Just Cause Ordinance, and general code, health, and safety enforcement through LAHD, the Department of Buildings and Safety (DBS), and the Department of Public Health (DPH)

(Los Angeles Housing Department, n.d.). TAHO contextualizes harassment within Los Angeles' unstable and unaffordable rental housing market and explicitly names harassment as a method to force unlawful evictions and charge market rate rent. TAHO defines harassment clearly, enumerating an extensive but not exhaustive list of actions that constitute harassment, including removing services, failing to complete repairs, refusing to accept rent, and verbal or physical threats ("Tenant Anti-Harassment Ordinance I," 2021). It provides a private right of action for tenants to bring civil suits against their landlords and makes violations of TAHO criminal offenses ("Tenant Anti-Harassment Ordinance I," 2021). In addition, TAHO provides a pathway for tenants to report harassment through the city. Under TAHO, tenants file complaints with LAHD, who then investigates complaints and educates landlords about violations. For noncompliant landlords, LAHD issues citations or escalates complaints to the City Attorney's Office for enforcement (Mejia, 2025).

Despite the value of an ordinance specifically legislating harassment, its limitations were clear early on, leading tenants and community-based organizations to advocate for revisions. The City Controller's office conducted an audit of the ordinance from August 2021-December 2023, finding major barriers to enforcement. The audit focused its assessment on if and how TAHO was "achieving its goals to protect vulnerable tenants and hold unethical landlords accountable for harassment" (Mejia, 2025, p.2). Notably, the Controller found that in 79% of sampled cases, LAHD failed to complete a full investigation. In addition, the audit found that LAHD closed tenants' cases after sending landlords basic information about the ordinance but without making any official determinations regarding tenants' complaints. Of tenants who submitted

complaints, 72% said that their landlords continued harassment after their case was closed by the city.

The audit identified the following key challenges to enforcement:

1. Lack of a comprehensive investigation and enforcement program; no formal policies and procedures for implementation
2. Limited investigator training and inconsistent enforcement
3. Unreliable tracking of cases and outcomes in LAHD's internal system
4. Limited LAHD authority to enforce TAHO due to insufficient enforcement tools (e.g., TAHO informational letters)
5. Disjointed ordinance roll-out due to funding challenges

While the ordinance includes a rent adjustment penalty that prohibits landlords from raising rents if an RSO unit becomes vacant due to harassment, the audit found that, at the time of writing, there was no mechanism in place to track or enforce these violations (Mejia, 2025). Scholar-activists attribute the lack of TAHO enforcement to a pattern of complacency, neglect, and bias within LAHD. Pointing to examples of LAHD's failure to act despite evidence and policy on the side of tenants, Gustavussen asserts, "the city's inaction, underfunding, and lack of enforcement reflects a seeming indifference to the consequences for the tenants of a hypercommodified and financialized housing sector, as well as an overriding desire to preserve the status quo at the municipal level. More pointedly, it reads as a concerted effort to limit tenant power" (Gustavussen, 2022). Gustavussen goes further to argue that LAHD's frequent reclassification of TAHO complaints and overall failure to enforce the ordinance "obfuscates harassment patterns intrinsic to corporate landlordism" (Gustavussen, 2025c, p.3142).

The audit recommended changes to the ordinance, many of which were on the radar of tenants and community-based organizations advocating for amendments to TAHO. The audit recommended: (1) establishing formal policies

and procedures for assessing TAHO complaints, (2) expanding LAHD enforcement authority and increasing fine amounts, (3) encouraging private litigation by increasing and ensuring civil penalties and attorney fees, and (4) improving the complaint intake process (Mejia, 2025).

In addition to the audit's recommendations, community-based organizations in the Keep LA Housed Coalition proposed seven amendments to the ordinance, including implementing a more expansive definition of harassment, recognizing the city's standing to bring TAHO cases, and, like the audit, strengthening legal remedies through increased damages and guaranteed minimum penalties and attorney fees (Keep LA Housed, 2023).

In 2024, the city updated the ordinance (TAHO 2.0) – all of the Keep LA Housed recommendations and a subset of the audit's recommendations (which were published after the amendments) were incorporated. TAHO now entitles tenants who prevail in court to receive 3x damages, rent refunds for reductions in housing services, mandatory reasonable attorney's fees, and civil penalties of up to \$10,000 per violation. Penalties are more severe when tenants are disabled or over 65 years old ("Tenant Anti-Harassment Ordinance II," 2024). While these changes are intended to improve tenants' legal standing in harassment cases and increase access to legal counsel by incentivizing private lawyers to take on anti-harassment cases, it remains to be seen how these changes are impacting enforcement of the ordinance.

Like the Controller's audit, this report is assessing the efficacy of TAHO enforcement based on if and how violations of the ordinance are sanctioned, to ultimately protect tenants and dissuade harassment. This report goes further to consider whether tenants express feeling resolved through the recourse provided.

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Tenant experiences of harassment

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Before moving into an assessment of TAHO 2.0's enforcement process, I want to first elevate tenants' experiences of harassment. Interviews with 9 tenants not only revealed clear patterns in how landlords leverage harassment to intimidate, coerce, and ultimately push out tenants, but these conversations also foregrounded the everyday impact of harassment and its psychic toll on tenants.

In line with research that suggests that landlords typically employ harassment to target rent-stabilized tenants, interviews with tenants, many of whom have lived in rent-stabilized units for at least five and up to twenty years, revealed persistent patterns of harassment, habitability issues, and intimidation. Typical issues raised by tenants include taking away parking, unpermitted construction or construction without proper habitability considerations, retaliation for filing complaints with the city, verbal assault, threats, neglect and failure to make repairs, utility shut-offs, and rejecting rent payments.

Utility shut-offs typically occurred without notice and for long periods of time. A tenant I spoke with who has a health condition expressed that utility shut-offs without notice can be fatal. She explained, “they would cut off the power from 8am-5pm, and they wouldn't give 24-hour notice. The landlord would text me that day, but with my pacemaker, I need the power.” Another tenant whose landlord was building ADUs without an approved Tenant Habitability Plan on the site of the tenants' former parking structure said of utility shut-offs and construction:

Never before did we have a lack of hot water for a full week...They came and cut a hole in my bedroom wall.

Disturbances related to construction came up multiple times in interviews. A tenant whose landlord had been neglecting repairs shared that the roof of the apartment “fell on [my niece and nephew] while they were sleeping, and then they did construction while my family was in the house. The landlord did not provide relocation.” Most tenants identified a **change in ownership** of their building as an inflection point when harassment began. One tenant outlined a pattern of progressive reductions in services, culminating in cash for keys offers after their building changed ownership: “They tried to scare us. They stopped accepting my rent...They removed the parking and started charging for it. They started removing things people use everyday. They tried to remove laundry machines as well...They started offering cash for keys...they offered me \$30K then \$50K...And obviously they would come with lies and say we'll fix things in your apartment and they never did.” In another instance, a landlord sent someone impersonating a city official to intimidate a tenant:

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[The landlord] sent a guy who said that he was from the buildings department and he had a report that I was doing illegal construction because I have a room divider. He wanted to enter my unit, and I said you can't because we're eating dinner. He had a video camera... He was looking at his phone and then said he had another complaint from CPS that there were too many kids living in this apartment. Then I was like, hold on...Why are you telling me you're from two different departments?

Tenants also emphasized the **acute physical and emotional toll of harassment** on themselves and their families. A tenant who was facing a potential illegal eviction explained:

“ I have gotten sick, I don't have an appetite. I feel broken over all of this...My friends say they don't recognize me any more, like a light has been turned off inside of me.

“ I've been crying nonstop. I'm so scared that [my landlord] will evict me.

Multiple tenants raised concerns about health issues related to the stress of harassment. One tenant with underlying medical issues expressed concern for her long-term health: “I'm afraid this will lead to a stroke one day.” Another tenant who lives on the same property as her landlord said, “it's really terrible. It's gotten to the point where I can't look at the owners without my blood pressure rising.”

Tenant harassment is not an abstract component of a financialized housing market but a real and acute crisis for those who experience it, with implications for all of us.

Tenant organizing in response

While many tenants that I spoke with shared their individual experiences of harassment and expressed feelings of fear and isolation, some highlighted tenant organizing as a method to build solidarity while in crisis and create new pathways to address harassment, both within and outside of traditional enforcement channels.

Tenants emphasized the power of organizing in **building a community of support** during a taxing and intense time. One tenant explained, “I was fighting by myself, but now I have more confidence because I have support. I've learned a lot. And it has given me the push to help others. Even though we are losing the battle [at my building], I know that there are other people who really really need help”.

Organizing has given me the strength to fight harder”

Given the limitations of enforcement, tenants and representatives from community-based organizations expressed the **potential for organizing to intervene in the administrative enforcement process**. Organizing allows tenants to collectively file complaints and place pressure on LAHD, sometimes through their councilmember's office. A representative from a community-based organization highlighted the impact of organizing and collective action on complaint outcomes and tenant power: “There is a building where, once tenants understood their rights and sent a mass amount of complaints together, they got excited. The same week, LAHD sent out an investigator, and they asked the tenants to show them the violations. It made the tenants feel empowered over their situation. It definitely builds tenant power and lets them see what they can do collectively.” Similarly, another representative from a community-based organization emphasized the importance of organizing in pressuring the city to act, explaining “we were able to help with organizing buildings, collecting evidence, holding press conferences, going to city councilmembers to get them to do something about it. Only then would LAHD go inspect [the building], meet with us and admit that they weren't doing their job.”

Further illustrating the power of collective action to pressure bureaucratic systems, in the Jacobin article, “LA Tenants Have Won a Breakthrough Against Landlord Abuse” (2025a), Gustavussen explores

how organizing among a group of Highland Park tenants led LAHD to issue its first TAHO citations against a landlord. In 2024, a new landlord bought the tenants' four-unit rent-stabilized building and began a campaign of harassment to push them out, including illegally raising their security deposits, towing their cars, destroying their garden, conducting illegal renovations in their units accompanied by armed security guards, and filing retaliatory eviction notices against tenants who refused cash for keys offers. The tenants organized as part of the Los Angeles Tenants Union, documented the landlord's violations and filed complaints with the city, held protests at the landlord's office, and ultimately engaged their Council District's Housing and Tenant Deputy. Their year-long organizing effort not only resulted in TAHO citations and criminal charges against their landlord but also led their building to be placed into the city's Rent Escrow Account Program (REAP) (Gustavussen, 2025a).

Organizing is also a route for tenants to fight harassment outside of the TAHO process, placing pressure on landlords through collective action. In a rent-stabilized Koreatown building, the new landlord was attempting to remove the tenants' parking to build additional units. The tenants, who were organized through the tenant's union, physically blocked the demolition of their parking, preventing the construction for ~6 months. Speaking to the power of organizing, one tenant asserted that, despite filing complaints with LAHD:

“*The most effective thing we have done and ultimately proved not to win was just stand our ground [on the parking]. Working through the city doesn't really work.*”

Similarly, at 249 South Avenue 55, tenants acting collectively shifted the landlord-tenant power dynamic and forced action. Alpine LA properties, previously discussed as notorious for harassment and eviction, bought the tenants' building in 2019. Through cash for keys offers, intimidation, threats to call Immigration and Customs Enforcement, illegal construction and more, Alpine LA attempted to push existing tenants out. The remaining tenants formed a tenant association, where they navigated the city bureaucracy, filed complaints, organized an eviction watch, and regularly communicated about building updates (“Resisting Social Cleansing in Los Angeles...”, n.d.). During a confrontation with the Alpine LA property manager about addressing a mold infestation in a tenant's unit, the tenants leveraged their collective power to force action: “Surrounding [the property manager], recording every moment of the interaction, the Ave 55 tenants stood firm in their simple demand [to replace the tenant's moldy carpet]. The maintenance workers seemed to grasp intuitively that the power dynamic had shifted; without waiting for [the manager's] approval, they stripped the carpet and hauled it to the dumpster” (“Resisting Social Cleansing in Los Angeles...”, n.d., para. 6). Beyond the immediate intervention in forcing the removal of the moldy carpet, organizing at 249 South Avenue 55 began the process of uncovering Alpine LA's predatory tactics across the city and led to the creation of the K3 Tenant Council, a group of tenant associations in buildings owned by Alpine LA. Together, they stopped Alpine LA from making cash for keys offers and led them to begin making repairs at their properties (“Resisting Social Cleansing in Los Angeles...”, n.d.).

Echoing the potential for organizing to intervene in harassment with more immediacy – and sometimes more effectiveness – than bureaucratic or legal efforts. One attorney explained, “I often tell tenants that they need to get together with their neighbors. Having someone beside you to stand up to your landlord may be more effective than what a lawyer can do [in addressing the immediate harassment]...that's the value of combining organizing and litigation.”

Interviews and case studies offer another lens to understand harassment as a catalyst for collective power-building to shift power dynamics and stir up entrenched systems. While the atomization of tenancy – both contractually and bureaucratically – often leaves tenants isolated and without support, in each of these cases, tenants worked collectively to place pressure on the city or their landlord, building solidarity, at times, forcing action, and, if only briefly, shuffling the stacked deck.

TAHO 2.0: Where are we now?

Key insights from the data

TAHO complaints are most common in Central and South LA in neighborhoods with more Black, Hispanic or Latino, and Asian tenants and more RSO units.

On average, TAHO complaints are closed in two months, though this varies based on the nature of the harassment.

However, the vast majority of complaints are closed without resolution for tenants or penalties for landlords, even in cases with repeat offending landlords or criminal actions.

While TAHO offers protections on paper, and organizing can facilitate its enforcement, effective enforcement independent of tenant pressure is necessary to support tenants in crisis and disincentivize harassment as an economic strategy. Thus, examining the efficacy of TAHO's enforcement process, both legally and bureaucratically, is imperative.

How does the enforcement process work?

As discussed, tenants experiencing harassment can file a TAHO complaint with LAHD and/or secure an attorney to sue their landlord. When tenants file a complaint with LAHD, it is first routed to a regional office where it is processed as an RSO complaint and a regional investigator is assigned to the case (habitability issues are typically filed separately as code complaints, and inspectors are sent into the field to assess). In theory, the investigator will reach out to the tenant, collect evidence, and make a determination about whether the complaint constitutes harassment. Many cases are closed or classified as RSO violations at this stage. If it is determined by the investigator to be harassment, they may send an informational letter to the landlord regarding TAHO. If the investigator deems the harassment to be egregious, they refer the case to the TAHO Task Force, who then conducts their own investigation and determines whether to close the case, issue citations, or escalate the case to the City Attorney's Office for prosecution. Throughout this process, investigator discretion and subjective interpretations of harassment determine the outcome of a tenant's complaint.

If tenants choose to take the legal route, they can represent themselves in small claims court or secure representation for civil litigation through legal service providers or private attorneys. The city is in the process of setting up a contract with legal service providers to take TAHO cases on behalf of tenants, which may increase capacity.

A look at the data

What do we know about TAHO complaints?

TAHO complaint data from LAHD offers an initial picture of administrative enforcement since the amendments to the ordinance took effect. It does not provide information on the legal enforcement process, which is discussed further in the following Interview Insights section. This data includes complaints filed from May 1, 2024 to September 30, 2025. It covers an eight-month period under TAHO 1.0 (May to December 2024), and a nine-month period under TAHO 2.0 (January to September 2025).¹ While this

¹ More information on the data can be found in the Appendix

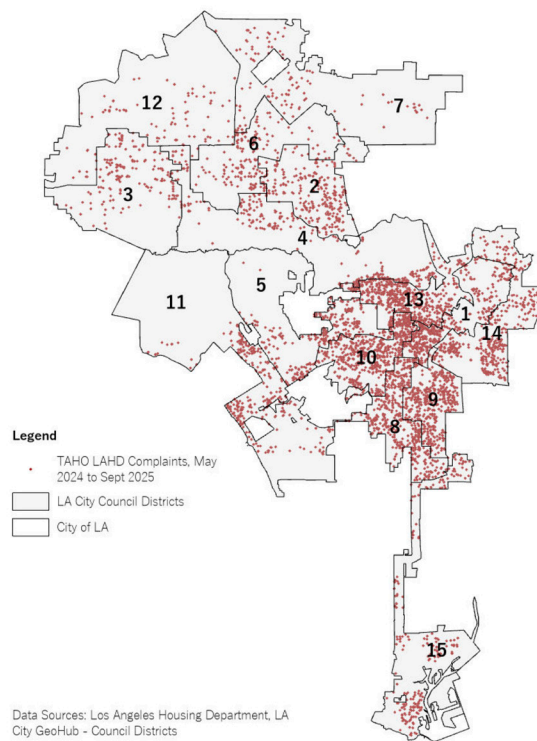
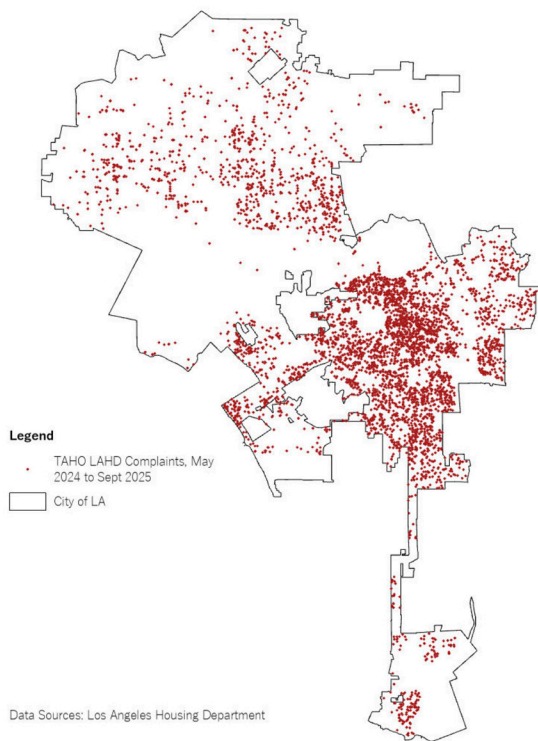
report is focused on the TAHO 2.0 enforcement process, this analysis examines complaints from under both TAHO 1.0 and TAHO 2.0 to offer some comparison of the process between 1.0 and 2.0 and provide a more comprehensive picture of the nature of harassment complaints with more substantive data.

Who is most impacted by tenant harassment based on complaint distribution?

This analysis finds that TAHO complaints are more common in neighborhoods with more Black, Hispanic or Latino, and Asian residents, more RSO units, and more vulnerable tenants (based on income, age, race, and other socioeconomic factors). While some of Los Angeles' more vulnerable communities are impacted by harassment, the complaint process is largely not serving them—or anyone. Tenants are submitting large numbers of complaints, but very few are resulting in consequences for landlords through the LAHD TAHO Task Force or the OCA.

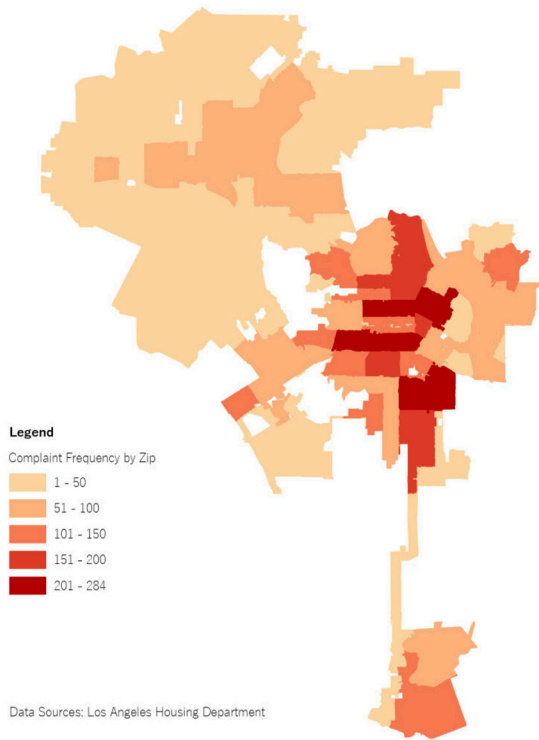
TAHO Complaints: Geographic Distribution LA City Council Districts

From May 2024 to September 2025 there were **7,305 unique TAHO complaints filed with LAHD, concentrated in Central and South Los Angeles** in Council Districts 1 (Eunisses Hernandez), 8 (Marqueece Harris-Dawson), 9 (Curren D. Price, Jr.), 10 (Heather Hutt) and 13 (Hugo So-to-Martínez).



The corresponding **zip codes with the most complaints** are as follows, both by frequency of complaints and complaints per renter-occupied units. Many of the zip codes with the most TAHO complaints by count are also among the zip codes with the most renter occupied housing units.

TAHO Complaints: Frequency by Zip Code



Most TAHO complaints (zip codes with 150+)

90011 - South Central, South Park	272
90006 - Pico Union, Harvard Heights	238
90037 - Vermont Harbor, South Park, South Figueroa Corridor	232
90026 - Echo Park, Silver Lake	215
90019 - Mid City, Arlington Heights	215
90004 - Central LA, Vermont/Beverly	183
90018 - Jefferson Park, West Adams	171
90057 - Westlake, Macarthur Park	170
90044 - Vermont Knolls, South LA	164
90003 - Florence, Broadway Manchester	162
90028 - Hollywood	154

Source: Los Angeles Housing Department • Created with Datawrapper

Most TAHO complaints per renter-occupied units (top 10 zip codes)

■ included in top 10 zip codes by count of TAHO complaints

90062 - Vermont Square, Expo Park	1.97%	106 complaints
90032 - El Sereno	1.75%	113 complaints
90037 - Vermont Harbor, South Park, South Figueroa Corridor	1.70%	132 complaints
90011 - South Central, South Park	1.52%	272 complaints
90018 - Jefferson Park, West Adams	1.46%	171 complaints
90043 - Park Mesa Heights, View Heights	1.43%	111 complaints
90006 - Pico Union, Harvard Heights	1.34%	230 complaints
90003 - Florence, Broadway Manchester	1.25%	162 complaints
90023 - Boyle Heights	1.24%	103 complaints
90016 - Crenshaw, Baldwin Hills	1.19%	140 complaints

Source: Los Angeles Housing Department; ACS 5-Year Estimates • Created with Datawrapper

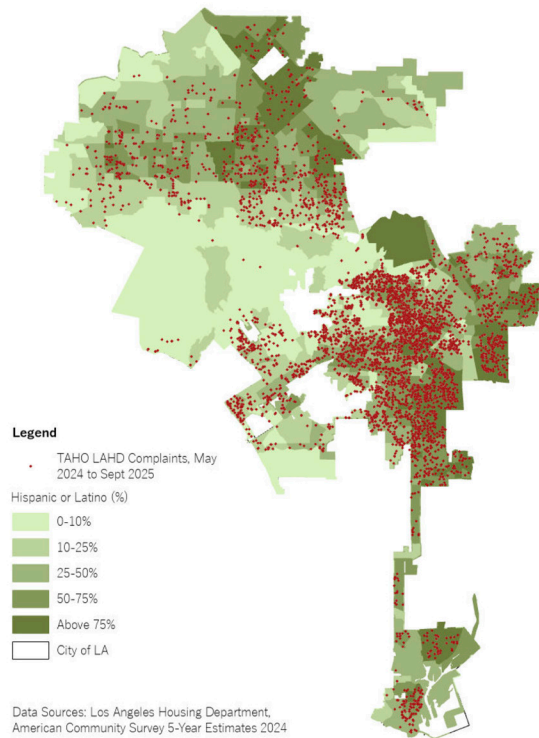
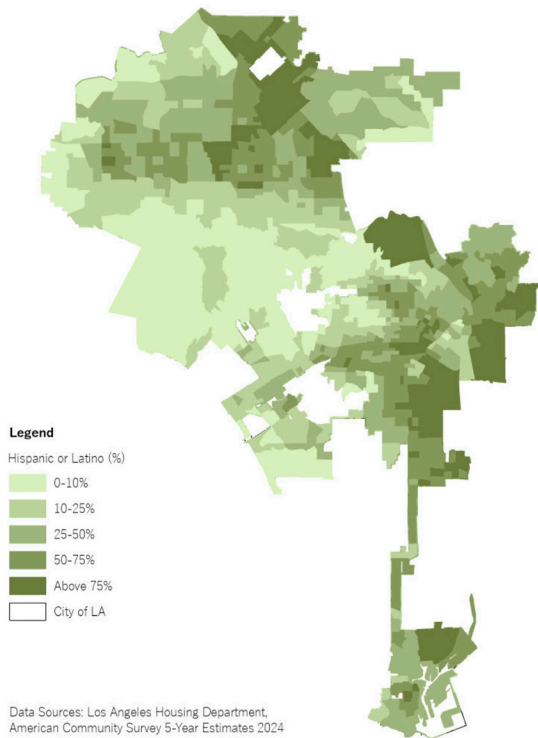
Many of these zip codes have also experienced an uptick in corporate ownership of rental housing, specifically LLC ownership and transactions. In their analysis of corporate ownership trends in Los Angeles from 2005–2015, Graziani et al. find that at-risk neighborhoods of Hollywood/East Hollywood, Koreatown/Westlake, the San Fernando Valley, and South Central all experienced significant expansions in LLC transactions, which are correlated with higher rates of disrepair and poverty (Graziani et al., 2020).

Looking at the distribution of TAHO complaints in relation to **racial demographics** across LA neighborhoods also suggests clear patterns.

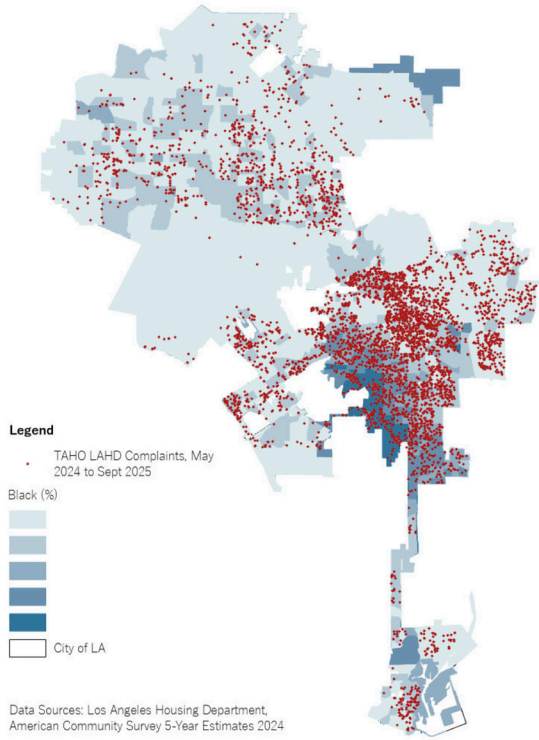
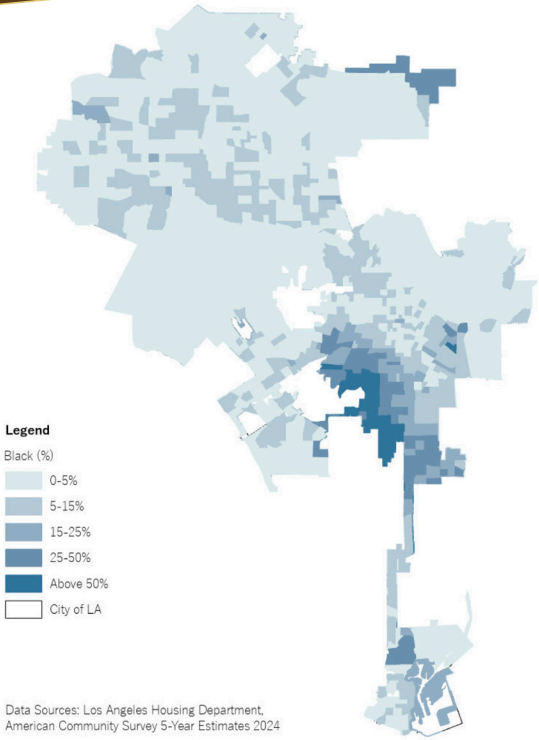
Complaints are concentrated in neighborhoods with **more Hispanic or Latino residents (East and South LA, San Fernando Valley), more Asian residents (Central LA, San Fernando Valley), and more Black residents (South LA)**. TAHO complaints are noticeably sparse in areas with a larger white population.

These findings reflect the dominant discourse around tenant harassment as a racialized process with uneven impacts. In addition, this is in line with research on the spatial distribution of poverty, health issues, environmental hazards, and other housing-related issues in Los Angeles, which are concentrated in many of the same neighborhoods with the greatest impacts on low-income people of color (Goldberg, 2020; Minaravesh, 2025; State of Poverty 2018-2024, n.d.).

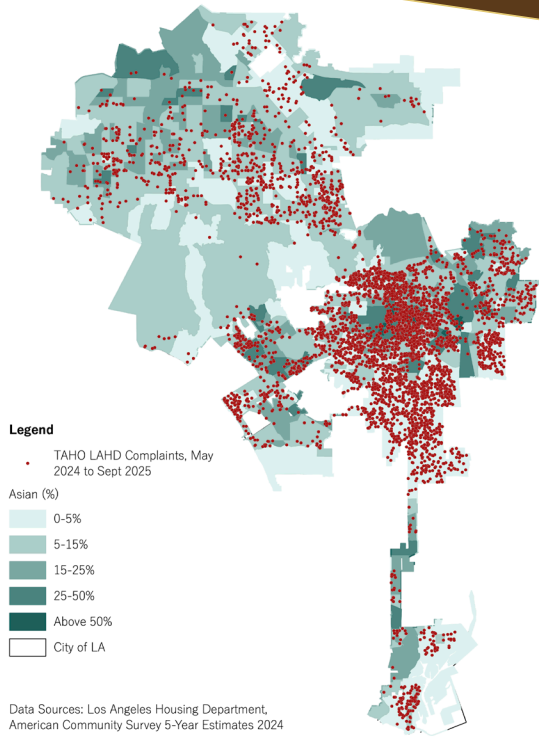
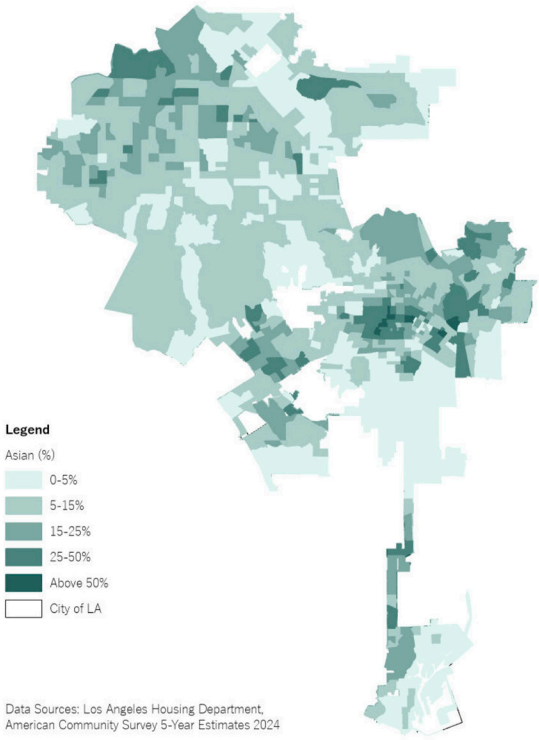
Hispanic or Latino Population & TAHO Complaints



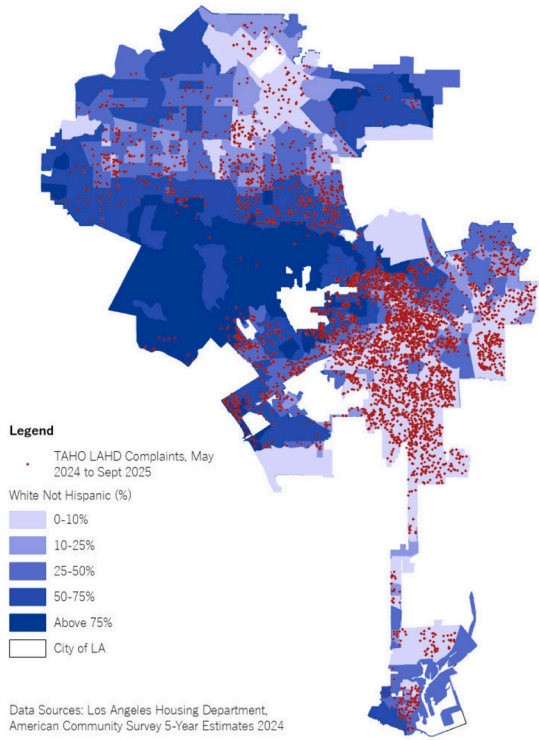
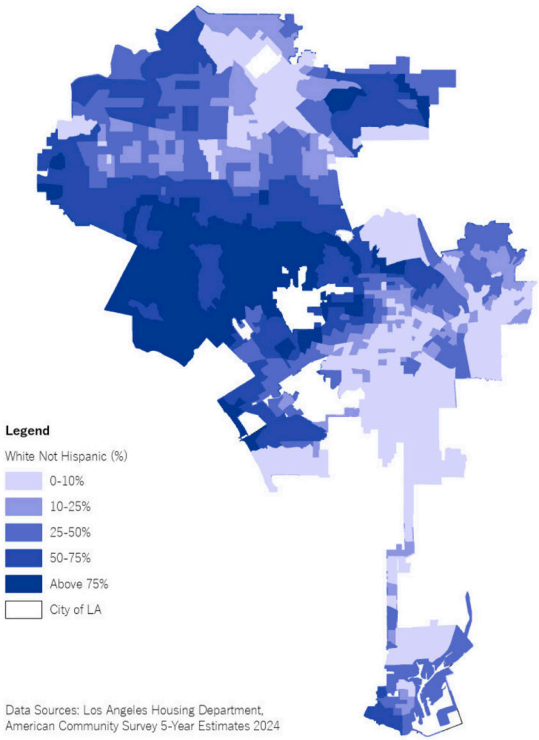
Black Population & TAHO Complaints



Asian Population & TAHO Complaints



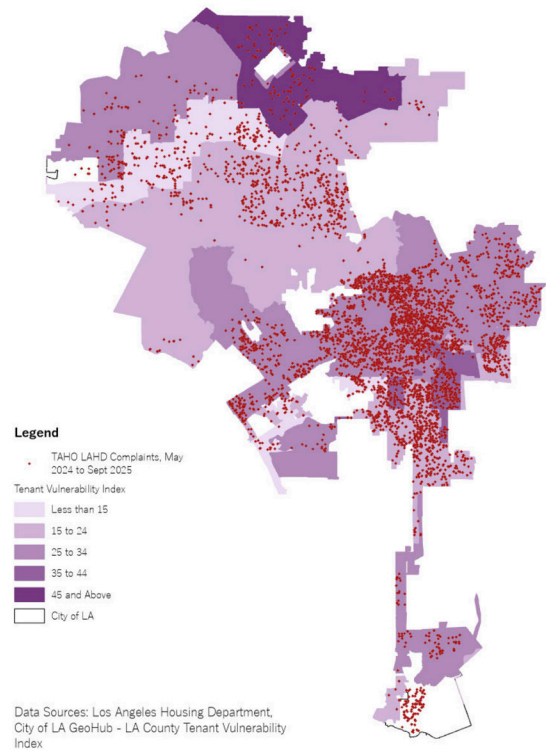
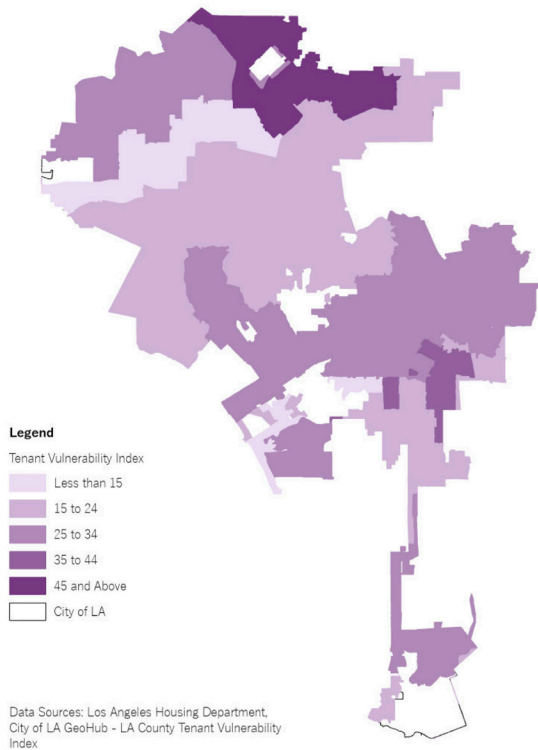
White Population & TAHO Complaints



Los Angeles County's Tenant Vulnerability Index assesses tenant vulnerability across Los Angeles zip codes based on twelve variables, including the percentage of renters living below the poverty line, race and ethnicity, education level, and age. Higher index ratings indicate greater displacement risk for tenants in that zip code. The most vulnerable zip codes are in Sylmar and Pacoima in the San Fernando Valley and in Downtown, Pico Union, South Central, and Leimert Park.

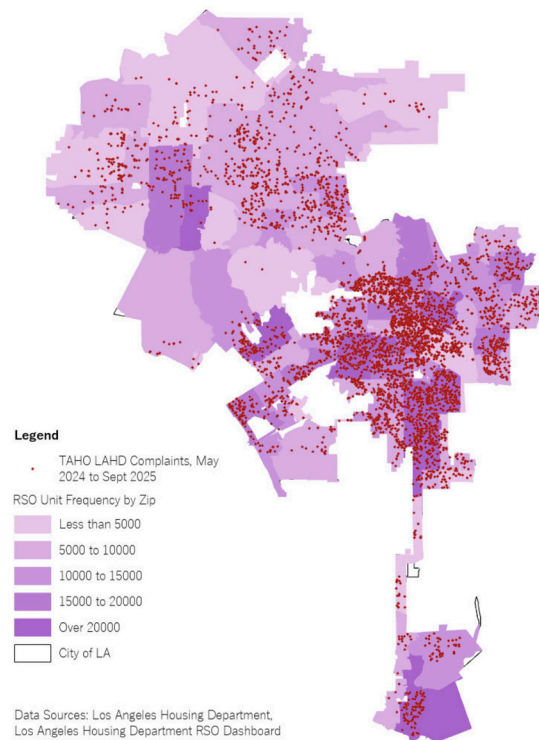
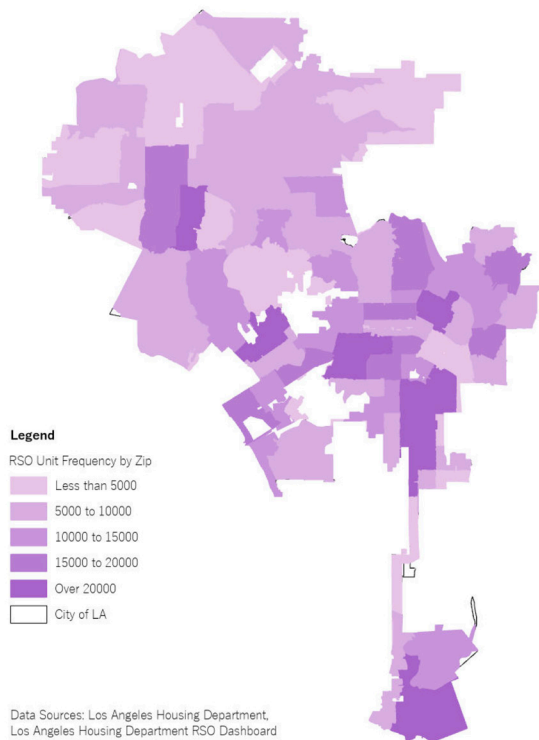
Tenant Vulnerability & TAHO Complaints

While complaints are certainly common in these most vulnerable zip codes, **the majority of TAHO complaints occur in zip codes with moderate tenant vulnerability ratings** – from 15 to 34 on the index. This may be due to density of renters, unequal spatial distribution of outreach, and/or comfort and fluency in navigating the LAHD complaint process.



Rent Stabilization Concentration & TAHO Complaints

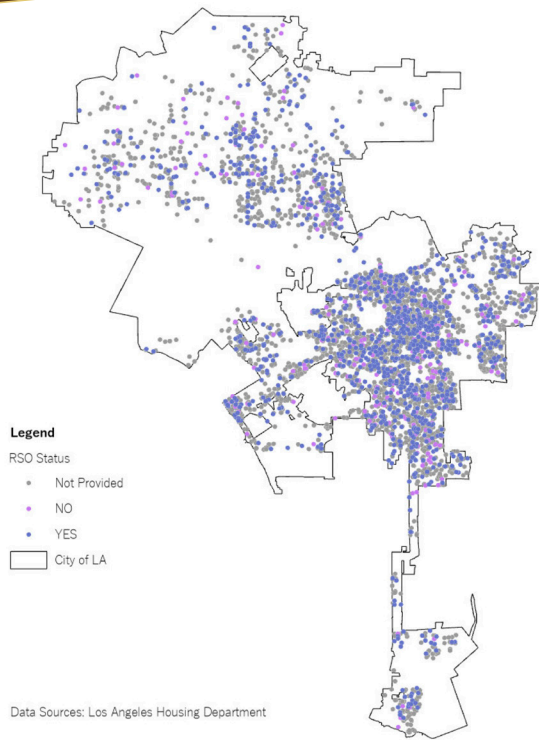
TAHO complaints are also concentrated in neighborhoods with more rent-stabilized units, reflecting patterns previously discussed. **Without vacancy control, landlords may use harassment as a tactic to push out tenants in rent-stabilized units, allowing them to raise the rent to market rate for the next tenant.**



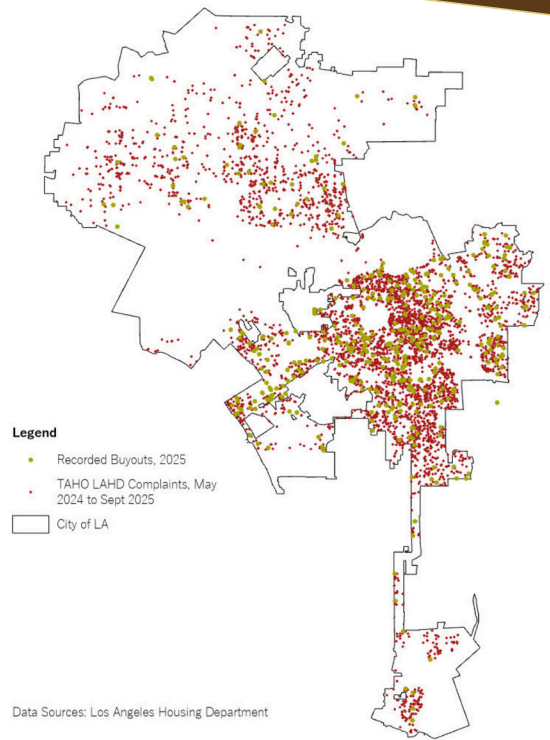
The connection between harassment and rent stabilization is further reflected in the complaint data – of the 1,600+ complaints filed from May 2025 to September 2025, **78.6% were reported by tenants in RSO units.**

In addition, to incentivize RSO tenants to self-evict, landlords may attempt **buyouts, or cash for keys offers.** Buyouts recorded by LAHD in 2025 are concentrated in the same areas as TAHO complaints and in areas with more rent-stabilized units, reinforcing the hypothesis that landlords are employing harassment as well as other predatory tactics to push out vulnerable tenants.

TAHO Complaints: RSO & Non-RSO Units



Recorded Buyouts & TAHO Complaints



Recurring TAHO Complaints

In addition to targeting tenants in rent-stabilized units and overall more vulnerable tenants, **many landlords are alleged to have violated TAHO on multiple occasions and by multiple tenants**, potentially indicating a pattern and practice of harassment. Nine buildings have over ten complaints from the 17-month period from May 2024 to September 2025. Five of nine of these buildings are owned by an LLC or LP. However, none of these complaints were submitted to the Task Force or escalated to the OCA, according to available data.²

² At least one case - 1430 S Wright St - has since been escalated to the OCA, resulting in criminal charges against the landlord (Goldberg & Vives, 2026).

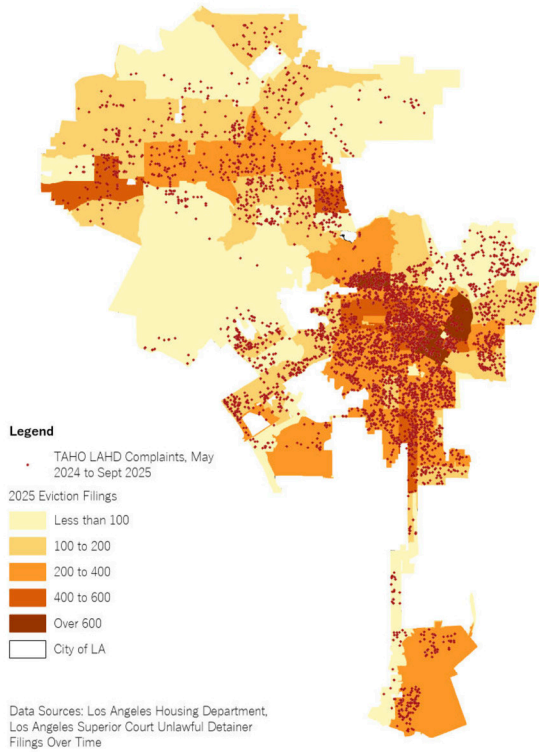
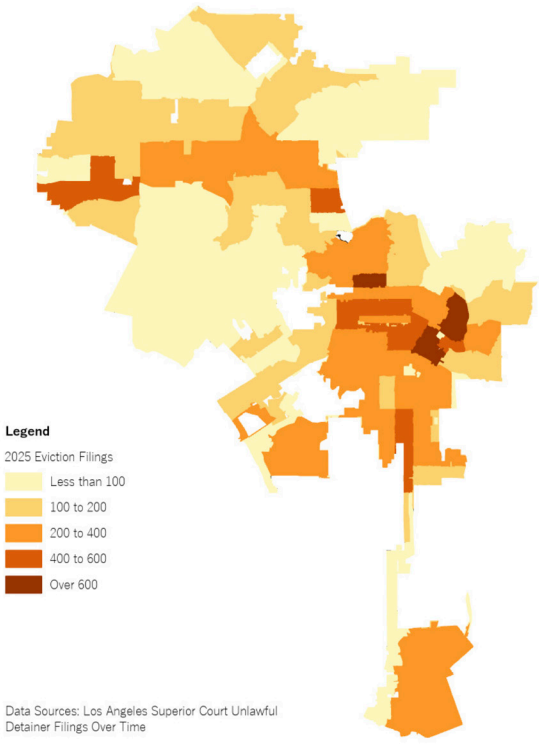
Buildings with 10+ complaints



Source: Los Angeles Housing Department • Created with Datawrapper

2025 Eviction Filings & TAHO Complaints

Looking at eviction filing data from 2025 alongside TAHO complaints, it's evident that TAHO complaints are **more common in zip codes with more eviction filings, clarifying the interlocked relationship between eviction and harassment** as reinforcing tactics employed by landlords to push out tenants.



Collectively, these findings build and reinforce a spatial geography of landlord-tenant violence, illustrating that tenant harassment is part of a broader landscape of housing precarity and predatory practices, such as evictions and buyouts, that impact more vulnerable, Black, Hispanic or Latino, and Asian tenants, and particularly those in RSO units.

What can the data tell us about the efficacy of the LAHD complaint process?

Understanding which Los Angeles communities are most impacted by tenant harassment and how harassment dovetails with other predatory landlord behaviors contextualizes this analysis of the complaint process. Data that provides insight into the complaint process is somewhat limited due to the availability of data from LAHD. However, **this analysis uncovers patterns and changes over time related to complaint status, resolution time, and harassment description**. Due to limitations of the data provided, analysis of harassment type is limited to complaints filed from May 2025 to Sept 2025.

For TAHO to work as intended, there must be consequences for landlords who are found to be in violation of the ordinance.

Complaint Status

A look at complaint status for complaints submitted from May 2024 to September 2025 makes clear that few landlords are facing consequences. **The vast majority of investigations into TAHO complaints by regional investigators are resulting in case closures**. In this period, only **ten complaints were submitted to the TAHO Task Force** for further investigation, and **five to the City Attorney's Office** for prosecution. It is unclear the current status of those complaints.

Complaint status for TAHO 1.0 and TAHO 2.0 (%)

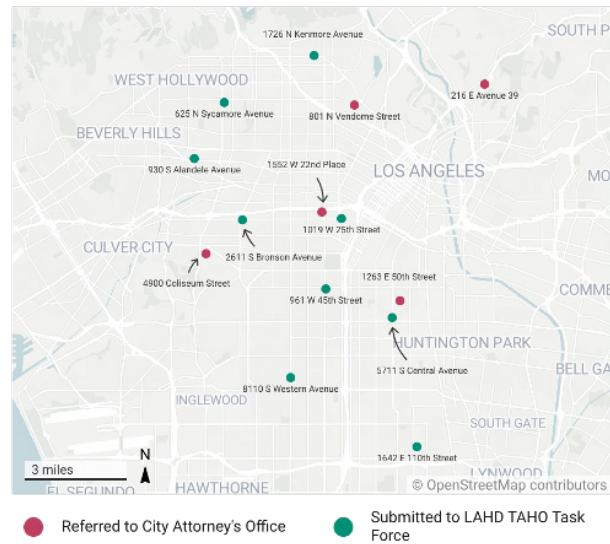
	Claims submitted under TAHO 1.0	Claims submitted under TAHO 2.0	All
Closed	95.5	73.3	82.6
Under Investigation, Reinvestigation or Rework	2.8	13.6	9.1
Under Closure	1.3	8.2	5.3
Assigned for Manager or Lead Review	0.2	3.2	1.9
Waiting	0.2	1.2	0.8
Submitted to Task Force	0	0.2	0.1
Other - Suspended, Duplicate or Received	0	0.2	0.1
Assigned to OCA	0.1	0	0.1

Source: Los Angeles Housing Department • Created with Datawrapper

Looking at the most recent data available for this report from September 2025 as a snapshot, of the 182 complaints opened in September, 172 are closed, 1 is under closure, 7 are under investigation, and 2 have been assigned for manager review.

The fifteen complaints referred to the OCA or submitted to the TAHO Task Force are outlined on the map to the right, excluding one complaint submitted to the Task Force from 494 W O'Farrell St. in San Pedro. Notably, these complaints are distributed throughout the city, with some from zip codes with the most complaints and more vulnerable tenant populations. The rationale employed by LAHD investigators in submitting complaints to the Task Force or by the Task Force in referring complaints to the OCA is unclear.

Complaints referred to OCA or submitted to Task Force



1 additional complaint submitted to Task Force not pictured: 494 W O'Farrell St San Pedro, CA
 Source: Los Angeles Housing Department • Created with Datawrapper

Harassment Type

For complaints filed from May 2025 to September 2025, the most common descriptions³ provided by investigators are:

Description for all cases	#	%
Abuse of right to access the unit (e.g., entering unit without proper notice, excessive notice to enter, refusal to give 24hr notice, conducting work not authorized by the tenant)	289	18.1%
Failure to make timely repairs (e.g., refusing to make repairs, "LL patched up issue but didn't resolve MOLD Issue," refusing to disclose information about repairs and timeframe for temporary relocation)	267	16.7%
Eviction based on false reasons (e.g., sending eviction notices despite protections)	216	13.5%
Interfering with the quiet enjoyment or habitability of the unit (e.g., excessive banging on doors, illegal lock out, leaving trash on tenant's front steps, blocking parking)	193	12.1%
Interfering with tenant's right to privacy (e.g., disclosing tenant's information to other tenants, opening bank mail)	131	8.2%

Each of these descriptions is a clear violation of TAHO based on the definition of harassment provided in the ordinance. Further, some complaints constitute crimes under criminal codes, such as hate crimes, forging a tenant's signature, theft and burglary, falsifying repair reports, and opening or withholding a tenant's mail. However, the majority of these cases have been closed. Details on descriptions for only open cases are outlined in the table below.

³ Harassment descriptions were only provided for data in this date range. Additional information on harassment description data can be found in the Appendix.

Description for open cases	# of cases
Eviction based on false reasons	7 (1 assigned to OCA)
Abuse of right of access to the unit	6
Attempting to coerce a tenant to move out by offering payment	5 (2 of 5 under closure)
Failure to make timely repairs	5 (3 of 5 under closure)
Interfering with the quiet enjoyment or habitability of the unit	3
Interfering with tenant's right to privacy	3
Refusing lawful rent	2
Unilaterally changing terms of tenancy	1 (assigned to OCA)
Not provided	1240 (3 assigned to OCA, 10 submitted to TF)

Resolution Time & Description

On average, complaints are closed in 60 days. For complaints submitted under TAHO 1.0, the average closure time is 65 days, and for complaints under 2.0, it is 55 days. This could suggest that the complaint process is more efficient under TAHO 2.0, or that cases are getting closed more quickly without robust investigation. **The average time open varies substantially based on the nature of the case.**

Closed cases open the <i>longest</i>	Days	Closed cases open the <i>shorted</i>	Days
Other - Intentional damage to unit or tenant's personal belongings, including theft (e.g., towed tenant's car, damaged or disposed of tenant's personal items, stole tenant's keys)	120	Other - Utility shut-offs (e.g., shutting off electricity and/or water without notice)	52
Other - Sexual harassment or inappropriate behavior (e.g., inappropriate behavior or advances, intimidation, stalking)	100	Other repeated acts of such significance causing a tenant to move out (e.g., construction noise)	53
Inquiring as to a tenant's immigration/citizenship status (e.g., threatening to call ICE)	94	Attempting to coerce a tenant to move out by offering payment (e.g., bribery, buyout offers, "signed voluntary vacate notice under duress/threat")	58
		Retaliation for tenant organizing, filing complaints, refusal to move out, or other issues (e.g., retaliation for filing complaints, for refusing buyout offers, for refusing sexual advances, for tenant organizing)	58

While the data related to the complaint process is limited, it suggests that the vast majority of tenant complaints are not making it to the TAHO Task Force or the OCA, even when the description indicates TAHO violations or criminal behavior. While they may be investigating TAHO complaints, regional investigators are not submitting to the Task Force, and the Task Force is not referring to the OCA, and thus, the process is not resulting in consequences for most landlords or a reprieve from harassment for tenants.

Why are so few complaints making it to the appropriate body to issue penalties? Tenant experiences of harassment make clear that even egregious instances of harassment are not being addressed, indicating that it is likely not a question of whether complaints are substantiated. Where and why is the administrative enforcement process breaking down? Where does the legal process fit in, and what are its opportunities and limitations? Answering these questions and addressing the landlord-tenant power imbalance through meaningful sanctions for landlords is imperative. Otherwise, harassment will continue to be a profitable and predatory economic strategy.

“TAHO 2.0: Where are we now?”

Key findings from interviews

1

Strengths

TAHO meaningfully strengthens tenant protections on paper and provides a new venue for tenants to lodge complaints and seek recourse for harassment. TAHO 2.0 amendments increased the financial viability of harassment cases for private attorneys, expanding this avenue for enforcement.

2

Challenges to the legal enforcement process

Both private attorneys and legal service providers stressed capacity constraints, which limit the number of TAHO cases they can take. This limited scale presents challenges for uptake, as few cases have gone to judgment, and there remains uncertainty around legal interpretations and precedent. Private attorneys raised questions around inclusion of habitability issues and the ability to secure insurance coverage for TAHO claims.

3

Challenges to the administrative enforcement process

Tenants, CBO representatives, and attorneys critiqued the LAHD complaint process for its complexity and lack of transparency. Few cases are being referred to the Task Force or the OCA, and even fewer are resulting in resolution for tenants. Interviewees attributed these challenges to LAHD investigator discretion, insufficient training, and/or internal cultural barriers.

4

Structural limitations of TAHO

By nature, bureaucratic and legal processes often struggle to meet the immediate needs of tenants in crisis, address underlying power dynamics, and take a systematic approach to enforcement. Harassment is not a one-dimensional problem, and therefore it requires more intentional and integrated interventions that account for its drivers and connections to other tenancy issues.

What can the experiences of tenants, attorneys, community-based organizations and city employees tell us about TAHO enforcement?

While analysis of TAHO complaint data paints an initial picture of the landscape of tenant harassment and the TAHO enforcement process, interviews add much needed detail and color to our understanding of the enforcement process, identifying strengths, limitations, and opportunities.

Alongside other changes, TAHO 2.0's central goal was to expand tenants' access to attorneys. While some tenants are securing attorneys and initiating TAHO cases, the majority of tenants seek recourse through the bureaucratic process, which, as the Controller's audit noted, displayed serious weaknesses. These interviews focus on both the legal and bureaucratic enforcement process from the perspective of tenants, private attorneys and legal service providers, representatives from community-based organizations, and city employees.

1 Strengths

Tenants, lawyers, and representatives from community-based organizations identified strengths of the ordinance in **codifying tenant's rights related to harassment, improving the financial viability of TAHO cases for private attorneys, and creating a specific recourse for harassment** and highlighted select instances where the process worked.

Strengthens tenant protections on paper

Tenants, lawyers, and representatives from community-based organizations stressed the strengths of the ordinance as written. On paper, TAHO offers substantial protections for tenants. One tenant praised the language of the law, explaining that TAHO is "very clear about harassment. It doesn't have to be your landlord screaming at you. It can be that they are not making repairs, anything that makes living there unpleasant...it doesn't have to be so in your face. On the surface, we're good, it's tenant friendly." One attorney added that it's "an amazing ordinance to address what we see happening all the time— developers coming in, taking away services, not responding to complaints, and people feeling like they don't have a home anymore."

In addition, TAHO provides a specific bureaucratic recourse for harassment that had not previously existed and strengthens tenants' legal standing for harassment claims in court. An attorney explained that, prior to the passage of TAHO, "we had been observing enormous amounts of harassment and not a lot of viable routes for tenants to affirmatively assert their rights against landlords." Affirmative litigation allows tenants to proactively assert their rights and stop unlawful practices. Tenants echoed this sentiment: "now there is a way to file harassment specific complaints, there is a process...but there is still so much fight to see results." For tenants, learning about their rights under TAHO made them feel more empowered and confident, even while acknowledging the ordinance's limitations.

A representative from a community-based organization highlighted instances where the LAHD TAHO complaint process worked to address specific habitability issues, explaining "where I've seen TAHO work is when tenants file the complaint, LAHD comes out, a code violation is sent in, and then something is fixed, like an ADA lift or front door lock." In addition to providing a clear definition of harassment and a dedicated process to file harassment complaints, because of the strengths of the

ordinance as written, TAHO has also expanded legal recourse for tenants.

Creates a more viable route for private attorneys to take TAHO cases

Looking at the legal process, attorneys largely agreed that, in amending the definition of harassment and guaranteeing attorney fees and damages for prevailing parties, TAHO 2.0 laid the groundwork for stronger enforcement, enhancing the financial viability of TAHO cases for private attorneys and improving tenants' standing. Many attorneys praised the ordinance's expansive definition of harassment. One attorney's firm uses the definition "liberally to characterize certain behaviors, and we haven't received a lot of pushback but haven't been able to really test it under fire at trial."

While some attorneys were taking TAHO cases under 1.0, the 2.0 updates have built confidence. For attorneys who were not yet taking on harassment cases under 1.0, the amendments made it financially viable to do so. One attorney explained:

“ *As a private practitioner, you need to keep the doors open... Before TAHO, there was no cause of action for attorney fees, so private practitioners would have to turn it down.”*

For an attorney that was taking TAHO cases under 1.0, TAHO 2.0 has "broadened the scope of what we've been able to take on."

Because of these changes, more private attorneys are incorporating TAHO into their cases even if they are not litigating many TAHO lawsuits. Many attorneys are folding TAHO into cases they would have already taken, strengthening those cases and increasing the potential damages they can secure for their clients (as well as attorney fees). One attorney who focuses primarily on cases where landlords are pushing out RSO tenants explained, "I was always going to go after those landlords, but TAHO has helped me get more for my clients." In contrast, another attorney shared that, for the TAHO cases they have brought, "the reason we brought [those cases] was TAHO, but we bring in other causes of action to buttress TAHO." For some attorneys, TAHO is the central focus, and other causes of action are secondary, while for other attorneys, separate causes of action are the focus (e.g., habitability), and TAHO is an add-on. In certain cases, attorneys are taking on exclusively TAHO cases, but that seems to be the exception rather than the rule.

How different private firms and attorneys incorporate TAHO into their work may depend on their orientation— some private firms are more public interest minded, and seem to be taking TAHO cases with the intent of addressing harassment. One attorney explained: "TAHO is one tool that we are using to assert our political position" of supporting tenants to "claim agency and assert a critical property interest" in the face of pressure from developers. For others, TAHO is a method to bolster their business, tacked on to other causes of action to secure attorney fees and stronger outcomes.

Of TAHO cases brought thus far, private attorneys agreed that these cases are generally not going to trial and instead are settling. This may be due to the threat of higher attorney fees if there is a lengthy trial, reflecting potential shifts in the economics of going to trial due to TAHO 2.0. Few attorneys have experienced substantial pushback on TAHO cases, but some cautioned that it is too early to draw conclusions. One attorney stated, "we get arguments, but they are only there to save face. In our TAHO cases, it's really hard to argue against it." While TAHO 2.0 has expanded viability for attorneys to take on TAHO cases, it is still a relatively new ordinance with challenges and uncertainties.

2 Challenges to the legal enforcement process

While both private attorneys and LSPs are bringing TAHO cases, it is not yet at a scale that is substantially impacting tenants' access or shifting landlord behavior. Attorneys attributed this to **capacity constraints of both LSPs and private attorneys and uncertainty and/or risk aversion**, contributing to slow uptake for LSPs in particular.

Capacity constraints and uncertain legal interpretations for private attorneys

For private attorneys, despite its promise, TAHO still poses challenges. Attorneys expressed concerns related to capacity and uncertainty around how provisions in the ordinance will be interpreted.

Some attorneys shared that they do not have the capacity to take on all the TAHO cases they are receiving, suggesting that, while private attorneys are offering improved recourse under TAHO 2.0, it is not available to all tenants. One attorney explained, "we turn away more people than we take. It is a huge need." Because it is still relatively early, attorneys also expressed uncertainty about how TAHO will be interpreted. One attorney said:

It still feels like we are in uncharted territory.

Despite its strengths, TAHO is still fairly nascent, posing challenges for attorneys and tenants around capacity, uncertainty and risk. Two areas of uncertainty that attorneys raised were habitability issues and insurance coverage for TAHO cases. For habitability issues, some attorneys are finding TAHO to offer a strong basis for a lawsuit, while others expressed wariness about including habitability in TAHO cases due to language in the ordinance that requires harassment to be willful and directed at a specific tenant or tenants. One attorney who frequently adds TAHO to habitability cases said, "TAHO covers the gamut of everything. Even though harassment is in the name, it is not the idea we have of harassment. That is of course covered, but so is failing to make repairs, doing things that affect the ability of tenants to live in the property." In contrast, another attorney shared that they typically do not bring habitability claims under LA's TAHO, but pointed to other jurisdictions like Oakland where they do. They explained that in LA, "when someone calls and they have a repair case, we'll ask if the landlord has ever told you you have to vacate, have they ever harassed you or said your rent is too low. We're looking for harassing statements directed at the tenant." Some attorneys suggest that LA's TAHO requires a higher standard, where it is clear that harassment is willful and directed at the tenant, again suggesting that TAHO litigation may not be a viable option for all tenants experiencing harassment.

Securing insurance payouts for damages and attorney fees is another area of concern— damages and attorney fees are often paid out through landlords' insurance policies which typically cover unintentional conduct (e.g., habitability issues). However, attorneys questioned whether TAHO damages would be excluded from insurance coverage as harassment may be considered intentional conduct, particularly due to the language in the ordinance around penalties. An attorney explained:

Insurance policies generally have a broad exception for covering intentional conduct. Most harassment is intentional conduct and would not be covered by insurance in a lawsuit. The landlord would have to pay it out personally, and it's a bigger risk for a private attorney to take on.

Attorneys suggested that this would be more of an issue in cases with exclusively TAHO claims. When TAHO cases are combined with other causes of action, it is more likely that clients can secure

insurance payouts for damages and attorney fees. However, an attorney that focuses primarily on habitability cases and tacks on TAHO explained that TAHO is “not something we want to make our practice. At some point an insurance company will say that the case is just based on harassment, and we won’t pay you anything.” Specifically speaking to securing damages for clients through insurance payouts, another attorney shared that, in cases where they are bringing in multiple claims, “the [monetary] value lies in TAHO because of the penalty language, but the trouble is that, if our damages come from penalties, they probably aren’t covered by insurance because they are likely intentional conduct.” If damages for harassment cases are not covered by insurance, clients may struggle to secure damages directly from landlords and insurance payouts would be smaller because they would not include TAHO penalties. Further, it may disincentivize private attorneys from taking TAHO cases if they cannot secure attorney fees from insurance payouts.

Finally, one attorney raised questions around the taxability of attorney fees and damages for TAHO cases, explaining that clients are typically responsible for taxes on attorney fees and damages except in civil rights cases. If TAHO attorney fees are taxed to the client, taxes could end up outweighing damages the client receives. As a result, the case would no longer be financially beneficial to the client.

While it does not seem like these ambiguities are preventing private attorneys from taking TAHO cases, as more cases are decided that inform whether habitability is included under TAHO and whether TAHO damages are covered by insurance, it has the potential to impact long-term uptake and scalability of these cases.

Capacity constraints and drawn-out contracting timelines for LSPs

Many interviewees at LSPs have also begun to bring TAHO cases. Like private attorneys, rather than taking on harassment-specific cases, many LSPs are adding TAHO to existing cases related to habitability and eviction. One attorney explained, “TAHO claims are typically related to other causes of action you could bring anyways. It adds to what you can allege in any given complaint.” Therefore, many “attorneys are tacking on TAHO claims to cases they would already be filing like illegal lockouts or habitability!”

While TAHO is increasingly part of their work, many attorneys stressed the limited capacity of their teams, which restricts the volume of TAHO-related cases they can take and impacts the nature of the cases that they do take (i.e., whole building vs. single tenant). In light of these capacity constraints, one attorney said, “it may not be worth it for a legal aid organization with limited capacity to spend four years on one case that will affect one tenant.” Another attorney facing similar capacity constraints explained:

“ *We are seeing many more cases that we would be happy to take on if we had capacity, but we don’t have the attorneys.*

The city is currently in the process of contracting LSPs to take TAHO cases on behalf of tenants, which may help to ease capacity

constraints. However, the contract was intended to begin in January 2026, and as of May 2026 had not yet been finalized— it is unclear whether this is due to a lack of funding, capacity, political will or something else altogether. Once the contract is in effect, the LSPs will be largely reliant on referrals from LAHD’s TAHO complaints, introducing another potential bottleneck into the process.

Limited proof points of successful cases

Related to uncertainty around legal interpretations, because of the relatively limited number of cases filed, the tendency of cases to settle instead of go to trial, and long timelines for litigation, few cases have gone to judgment, and thus, there are insufficient proof points of successful cases to build private attorney and LSP confidence and familiarity around TAHO cases. An attorney explained that, “when TAHO passed, we thought it was a godsend. It’s difficult for people to affirmatively assert their rights against landlord mistreatment, but primarily because its newness and the economics of these types of lawsuits, not a lot of attorneys are taking them...there are other people in the field doing it, but there is not a lot of case law there.”

Some attorneys highlighted the complexity and resource-intensive nature of harassment cases compared to habitability and eviction, reinforcing the importance of proof points. Examples of successful cases are particularly important for private attorneys to feel comfortable taking on TAHO-related cases and securing attorney fees. One attorney noted:

“People will see these cases as riskier to take on unless...enough are built up that you get a sense [of the potential for success].”

Some attorneys expressed optimism about TAHO’s potential to deter landlords from harassing if large, high-profile cases are filed and won (either by the OCA and/or private attorneys and LSPs). One attorney explained that, to deter landlords and for private attorneys to feel confident taking on more TAHO cases, “there would need to be someone to break the seal, bring a big case and win.” Others emphasized the importance of volume in deterrence. One attorney suggested “a campaign of repeated filings and appeals and enforcing these laws, changing the norms of judges for the availability of these remedies. [However,] that takes a lot of time and effort...You need a lot of brave people to show up and try to get [relief] knowing that if they don’t, it’s waving a green flag for harassers to continue.”

As the legal process is not yet operating at scale, the bureaucratic enforcement process is the primary available recourse for tenants facing harassment. However, as the TAHO complaint data suggests, the bureaucratic enforcement process is not resulting in meaningful resolution of TAHO complaints for tenants. Tenants, community-based organizations, attorneys, and city employees point to several challenges, including the complexity and opacity of the complaint process itself and internal operational and cultural barriers within LAHD.

3 Challenges to the administrative enforcement process

Tenants, attorneys, representatives from community-based organizations, and city employees consistently expressed frustration with LAHD’s complaint process as it **rarely results in meaningful outcomes for tenants or sanctions for landlords**. Interviewees critiqued the process for its **complexity and lack of transparency** and suggested that these challenges and others may stem from **inspector discretion, limited training, and/or LAHD’s internal culture**.

Opaque LAHD complaint process

LAHD's complaint process is opaque, with limited communication and transparency around case status. One tenant compared the process to a black hole– “You submit a complaint into a black hole and then it’s done.” She went on to critique the lack of transparency, explaining, “it’s very opaque and you have no idea what’s going on and if you call for a status update they’ll just reread the status to you. There’s no transparency whatsoever. I’m the kind of person that asks questions, tries to understand and they can’t give you a satisfying answer.”

Many tenants expressed frustration about long wait times for updates and a lack of clarity about case status and case closure rationale. Some tenants did not hear from LAHD at all after filing their complaint. One tenant explained:

“

You file your complaint and then nothing happens. They send a paper and that’s it. There are no consequences, so landlords just keep harassing and harassing. They just keep doing it.

This lack of transparency and communication is compounded by the complexity of the complaint process itself.

Complex, cumbersome LAHD complaint process

The complaint process is complex, placing the burden of proof on tenants and requiring substantial evidence and fluency with technology and the city’s bureaucratic apparatus to file effective complaints, which can be challenging for older and non-English speaking tenants. Discussing the complexity of the complaint process, a representative from a community-based organization suggested, “there needs to be a YouTube video showing tenants how to file a complaint...all the steps in real time. You can’t even call in to make a complaint, you have to do it online or in person, [which is an issue for] tenants who don’t have access or don’t know how to navigate that.”

In addition, the process requires substantial information from tenants– a city employee explained, “there is a high threshold for evidence that tenants need to submit. Harassment is about building that narrative.”

Notably, there is not a TAHO-specific complaint portal on LAHD’s website. Currently, tenants submit harassment issues as RSO complaints, which may then be classified as harassment by LAHD investigators. Tenants can submit habitability (code) complaints separately. A representative from a community-based organization expressed frustration about the process: “The online complaint process is pretty confusing. You can only file RSO and code complaints...they should have their own complaint portal for harassment.”

Because of these challenges, many tenants highlighted the value of support from community-based organizations in navigating the complaint process. One tenant explained:

However, organizations supporting tenant navigation expressed frustration about “spoon-feeding” complaints with thorough evidence to LAHD, and there continues to be little action.

”
I wouldn’t have gotten this far [without support]. It is complicated. Before [SAJE] reached out, I tried doing it on my own...but I would leave messages with all the numbers for the city and wasn’t getting any calls back. I gave up. It was making me more sick.

Minimal LAHD complaint outcomes

While many acknowledged the value of the ordinance in strengthening tenant's rights on paper, there was an overriding sense of dissatisfaction and disillusionment with the bureaucratic process. One tenant said:

“*We think to ourselves we have the law on our side, but it doesn't matter. There is no enforcement of anything. These laws are just on paper.*”

Most importantly, the LAHD complaint process is generally not resulting in outcomes for tenants. Most tenants interviewed did not reach a resolution through LAHD's TAHO process. While two tenants that I spoke with had their cases referred to the TAHO Task Force, neither had actually heard from the Task Force directly. One tenant explained, "I've filed over 10 harassment complaints and they haven't done anything." Similarly, a representative from a community-based organization supporting tenant navigation said:

“*I don't think I've reached a point where a tenant is satisfied with LAHD's actions*”

Even in cases where landlord action is criminal, LAHD may also fail to act, as demonstrated by the complaint data. In one instance, a landlord smashed a tenant's car window, and LAHD only addressed the complaint after a community-based organization advocated on the tenant's behalf and elevated the police report to LAHD, according to a representative from a community-based organization. Other representatives from community-based organizations and attorneys highlighted similar instances of LAHD inaction despite criminal landlord behavior. When committed by a landlord against a tenant, crimes may be perceived as *disputes*, pointing to unique and problematic perceptions of landlord-tenant relationships as somehow outside the law. As one representative from a community-based organization plainly said:

“*When you look at some of these buildings, somebody needs to be arrested.*”

Attorneys and representatives from community-based organizations also expressed frustration with complaint process outcomes. A few attorneys even stated that they rarely encourage their clients to submit LAHD complaints given the issues with the process. One attorney said, "I have a lot of cases where I would tell them to file a TAHO complaint if I believed that it would lead to something, but they'll just be demoralized by the outcome." Another attorney went further, suggesting that limitations of the LAHD complaint process could undermine tenants' chances in court, explaining, "we have been concerned with how LAHD has handled tenant complaints. It seems to be a major problem. I'm not sure if it is an issue of leadership, pressure, lack of resources, etc., but we are seeing a ton of deference to landlords. We are almost at the point where we are cautioning people against going to LAHD because, if they make the wrong decision, it might look bad or hurt their case."

In terms of OCA prosecution, the OCA recently established a position in the Public Rights Branch to prosecute TAHO cases. However, the cases referred to the OCA prior to the establishment of that position were not sent to the Public Rights Branch. The addition of the TAHO-focused position in the OCA may improve prosecution of TAHO cases, but its success depends in large part on the ability to secure case referrals from LAHD or otherwise. A city employee corroborated that, thus far, the OCA has received very few case referrals from LAHD and suggested that improved coordination between LAHD and the OCA to establish guidelines for referrals could strengthen the process. As of now, community-based organizations and Council District offices are sending referrals directly to the

OCA, but these are time-intensive and remain insufficient. LAHD has yet to begin referrals to LSPs for litigation and to community-based organizations for building outreach.

Both tenants and representatives from community-based organizations suggested higher fines and greater consequences, expressing concerns that the current citations are insufficient to deter landlords. Another representative from a community-based organization explained, “it seems like landlords or managers are not afraid of LAHD and that lack of fear and the lack of punitive measures beyond the internal referral to the Task Force makes it a superficial law with little teeth.” Echoing these sentiments, another representative from a community-based organization asked of the consequences:

Does it really force the land of the landlord? Not always.

If citations remain low, one tenant suggested that “companies will just write them off as the cost of doing business.”

Why is the bureaucratic process largely failing to create meaningful outcomes for tenants or consequences for landlords, and why are so few cases being escalated to the TAHO Task Force or referred to the OCA? Some suggested internal LAHD operational and cultural barriers.

LAHD investigator discretion and/or training

Both tenants and representatives from community-based organizations highlighted variability in how LAHD investigators approach harassment cases, suggesting insufficient training and/or too much discretion in decisions to close, reclassify, or escalate cases. Discussing LAHD training, a representative from a community-based organization stated:

I don't think that public-facing LAHD staff are trained well enough on TAHO to understand what constitutes harassment.

They went on to explain, “when we went to file complaints with a group of tenants in person, some of the staff tried to say actually this isn't harassment. If we weren't there in person to advocate for them, there's a power imbalance, the tenant might accept that it's not harassment when it is.”

Others suggested issues with discretion, when in the face of clear habitability or harassment violations, some investigators fail to act. A representative from a community-based organization explained, “[Inspectors] don't take pictures, they may not even enter the property...We get into [units] where the whole wall is covered in mold or there is a hole in the roof. If an inspector saw, the landlord should get in trouble, but they just let it be. When it comes to REAP, it never goes through, they give them continuing extensions.” This discretion likely extends up the bureaucracy to the TAHO Task Force in decisions to issue citations or escalate to the OCA.

Further, some tenants and representatives from community-based organizations suggested internal LAHD bias against tenants and highlighted experiences of disrespect with harassment investigators and code inspectors. While discussing an instance when an inspector came to his unit, a tenant explained, we were talking to an inspector and he “just started walking away. [His supervisor and another inspector] are seeing all of this and they don't say anything, don't apologize...when we brought

it up, they said he was probably having a bad day." He continued:

Others suggested similar biases— a representative from a community-based organization asserted that investigators “bring in their own biases. I don’t think that they act with objectivity...I don’t think that they act in favor of the victim, they act in favor of the harasser, in my experience.” Some suggest that these biases may reflect an internal culture that favors landlords and/or operational challenges that make assessing harassment complaints particularly difficult.

When you ask [LAHD staff] questions, they look at you like you’re stupid, you tell them what’s happening and they say it’s not. It feels like they are on the owner’s side.

Misalignment between LAHD’s internal operations and culture and TAHO enforcement needs

Connected to investigator discretion, assessing and addressing TAHO complaints is a relatively new and unfamiliar task for LAHD. A city employee suggested that harassment complaints are typically more subjective than habitability (code) and RSO violations and may be more time-intensive and complex to assess. They explained that regional investigators “may focus on code enforcement or illegal rent increases and put harassment on the back burner because it requires more work and patience” and subjectivity which runs counter to the “culture of doing enforcement in a black and white way.” Thus, “regional offices are not doing the referrals to the Task Force in a way that is effective,” resulting in too few TAHO cases reaching the Task Force. Similarly, an attorney suggested:

[Investigating harassment] requires a certain kind of emotional intelligence, a different framework that we don’t typically see within administrative housing agencies that are more used to looking at plumbing problems and rent increases.

Further, the LAHD system is not designed to investigate harassment, as inspectors are only directed to go into the field for habitability complaints. Effectively addressing TAHO complaints may require a culture shift within the department.

In addition, interviewees suggested that LAHD is not using its full authority— a representative from a community-based organization explained, “LAHD has more power than they use. I don’t know who is trying to thwart that power.” Some suggested that this may be due to biases against tenants within the department— a representative from a community-based organization asked:

Why do I have to advocate to this level with LAHD when they are supposed to be an unbiased party? They assume that the tenant is lying or exaggerating.

Tenants and representatives from community-based organizations questioned if there was a lack of political will within the department, directives or cultural imperatives in support of landlords, or insufficient institutional capacity that is blocking effective TAHO enforcement.

4 Structural limitations of TAHO

In addition to process-oriented challenges, interviews uncovered structural barriers to TAHO enforcement. **By nature, administrative and legal processes often struggle to meet the immediate needs of people in crisis, address underlying power dynamics, and take a systematic approach to enforcement.** In contrast, harassment is often urgent and acute and is closely connected to other tenancy issues. Further, in theory, the bureaucratic process offers recourse for tenants and consequences for landlords at scale, while litigation offers compensation for tenants in specific circumstances. However, these two modes of enforcement are not effectively operating in concert to support tenants.

Urgency of harassment vs. drawn-out bureaucratic and legal timelines

Many tenants, attorneys, and representatives from community-based organizations either explicitly or implicitly identified a mismatch between the acute and urgent nature of harassment and the slow, drawn-out nature of bureaucratic and legal enforcement. Because litigation is typically slow and time-consuming, an attorney asserted:

“*The legal process is not a perfect remedy for harassment because it is a very time sensitive problem and a not very time sensitive solution.*”

Another attorney explained, “These cases take forever, they are very slow moving. I filed one in March 2025 and our trial date is set for over a year from now [in March 2026].”

Even if the LAHD complaint process or litigation work as intended, they may succeed in securing financial compensation for tenants or eventually placing sufficient pressure on the landlord to cease harassment, but they typically fail at immediate intervention. One attorney explained:

“*People need to have the stamina and support and know that filing a harassment case won't stop their landlord from harassing them, at least not for a while, and it could certainly make it worse.*”

However, tenants experiencing harassment are often in crisis, and many expressed that their primary desire was for the harassment to stop. Discussing litigation, a tenant explained, “the monetary thing is a years-long process to get some compensation for what you went through, but it doesn't solve the issue of I just want my housing.” Even the LAHD process takes months— one tenant said, “two months [to hear back from LAHD] is long, especially in situations where you're facing violence or intimidation.”

While small claims court is faster than civil litigation (a ~6-8 month process) and accessible to tenants without attorneys, most attorneys agreed that it was not leading to favorable outcomes for tenants. An attorney asserted that, “TAHO claims are often unsuccessful in small claims,” and even “when you win, the landlord can just appeal...redo the same case with a different judge, and the landlord is allowed to have a lawyer. It doesn't work when there is a big power imbalance between the parties.” Another attorney explained, in small claims court, “we've had cases with really strong evidence, and tenants don't win anything. It is up to the judge's discretion.”

Considering all of this from the perspective of a tenant who is experiencing harassment, a representative from a community-based organization explained, “especially when you're debilitated by the stress and despair of harassment, it's like I don't want to think about all of this, I just want it to be resolved. But the victim has to go through so many obstacles just to get some peace.”

This misalignment between the urgent and acute nature of harassment and long timeframes for administrative and legal recourse has real impacts on tenants in crisis and suggests limitations of our existing policy interventions.

Access to attorneys is not a silver bullet

While TAHO 2.0 focused on expanding tenants' access to legal recourse, many attorneys emphasized the limits of the legal process for tenants facing harassment and the importance of complementary bureaucratic and legal enforcement. As previously discussed, a lawsuit does not provide immediate relief for tenants facing harassment and may take years for resolution and compensation. Further, litigation may not be a fit for all tenants or situations— tenants need the time and capacity to engage in a years-long litigation process and attorneys need a strong enough case. One attorney explained:

“ *The substance of being harassed, suing your landlord is a tough remedy to ask someone to enforce. If you are still living there, no matter your legal remedy, it's still a shitty situation. It's not a reason for there to not be a law but the law is not the answer to this problem.*

As attorneys do not have capacity to take on all TAHO cases, they may select cases based on factors such as the strength of available evidence, demonstrated pattern of harassment over time, landlord potential to pay, and tenant reliability. For private attorneys in particular, litigation may only be worthwhile if the case is large enough to justify substantial attorney fees and, absent insurance coverage, if the landlord has sufficient resources to recoup at the end of the case (i.e., large landlords > small landlords). Discussing the tradeoffs and limitations of TAHO cases, an attorney at a legal service provider said, “often, we see that tenant's cases are too small...they do things like remove parking and an illegal or pretextual eviction. Because it's one or two issues, no private attorneys will take it because there isn't enough money. If we did it, we would be working on individual cases for years and wouldn't be able to address larger issues.”

In addition, some attorneys suggested judicial bias against tenants in both small claims court and civil court and highlighted the negative impact of judicial discretion on tenant outcomes. Discussing civil litigation, an attorney said, “one judge said they didn't know what [TAHO] was and removed it as a defense for [the tenant's] eviction case.” On the small claims side, another explained, “a lot of judges sympathize with small business owners so they sympathize with landlords...We've noticed a huge bias towards landlords and against our clients.”

And most fundamentally, there will always be many more tenants facing harassment than attorneys available to support. Discussing the limitations of litigation for addressing large-scale tenancy issues, an attorney said, “if it was up to every tenant to sue their landlord for habitability issues there would be so many and they wouldn't get addressed.”

Another expressed frustration with insufficient bureaucratic enforcement:

” *I feel like we are doing the job of the government. We are in charge of enforcing their laws but we don't have the resources of the state.*

Because of the limitations of lawsuits, an attorney explained:

“ *For some tenants, their cases are so egregious that they can bring a lawsuit. For smaller TAHO violations...the administrative enforcement from LAHD is really important.*

Given these limitations, many attorneys stressed the importance of a strong bureaucratic enforcement process through LAHD operating alongside litigation that prosecutes the worst offenders. Coordinated enforcement both within and across legal and bureaucratic channels is necessary.

Need for systematic, coordinated enforcement at scale

Many tenants' experiences of harassment include eviction attempts and persistent habitability issues (e.g., failure to repair damages, unpermitted construction), but the bureaucratic process is often fractured and fails to address these issues or their underlying drivers in a coordinated, interconnected way.

The legal process offers an opportunity for attorneys to connect these related issues in ways that the bureaucratic process currently does not. One attorney explained, "a lawsuit is a totally different vehicle than going through a city department. It's a way to tell the whole story altogether and ask for a remedy that can incorporate all of those things." In addition, many attorneys discussed using TAHO as a defense in unlawful detainer cases for tenants facing eviction. However, while litigation offers an avenue to connect these issues, it is a relatively isolated intervention.

Further, in part due to corporate consolidation of rental housing ownership and the profitability of harassment without vacancy control, many landlords are chronic violators across all three of these issues. An attorney explained, "rarely is harassment happening without intent to evict. Usually an eviction lawsuit is not the first thing a landlord would try. The sequence is: harass, harass, try an eviction and harass them, and if they lose the eviction case because of a harassment defense they'll just try again." Another corroborated:

“ *If a landlord is harassing so badly that it's worth filing a lawsuit, then there are probably other things they are doing that are illegal.*

Despite these connections, representatives from community-based organizations expressed frustration about the siloed nature of LAHD enforcement: one said:

“ *[LAHD is] not working with their own colleagues, they don't want to talk to each other about code enforcement or TAHO. But harassment can come from bad conditions, so they should be connected...if landlords aren't fixing the same things over and over, it's harassment.*

Some assert that these practices are part and parcel of landlords' business strategy, embedded in a broader economic framework that incentivizes harassment, negligence, and illegal evictions.

In addition, tenants, attorneys, and representatives from community-based organizations all pointed to patterns of landlord behavior that are currently not being addressed under TAHO, or through channels for habitability and eviction issues. An attorney explained:

They went on to discuss the costs of failing to address harassment and other related issues in a coordinated way: "if they judge harassment on a case by case basis, and the landlord has learned from past interactions about what will be tolerated, that can allow for more damaging patterns of low level behavior that persists over a long time and can be more menacing."

” *Criminally punishing one individual doesn't address the broader economic framework that is precipitating the harassment.*

Tenants, attorneys and representatives from community-based organizations again suggested stronger consequences that not only penalize a landlord but intervene in the system. A tenant said:

“

The law doesn't address that this is a bad actor. They paid so they won't do it again? That person shouldn't be allowed to be an actor. There should be three strikes...Where is the database of bad actors? Why can't they get their license taken away? Hair braiders get their licenses taken away. Why do we have such different standards for landlords?

Echoing these sentiments, a representative from a community-based organization explained, “LAHD's goal is to get the issues corrected, but not necessarily to address a bad landlord.”

While the passage of TAHO expands Los Angeles' patchwork of tenant protections to include harassment, the redress is still atomized and incumbent on individual tenants, which runs counter to systematic enforcement and consequences for bad landlords across harassment, habitability, and illegal eviction.



Considerations

Is it too early to assess?

While the current limitations of TAHO are clear, some attorneys and representatives from community-based organizations expressed hesitance in assessing TAHO 2.0, particularly the legal enforcement process. While attorneys spoke to the limitations of the TAHO legal process as is, many were hesitant to draw longer-term conclusions as the legal process is not yet operating at scale. One attorney noted, “the problem is there is a lack of data [on TAHO's impact] because we have only filed a few cases.” As discussed, interviewees noted that the implementation process has been slow as contracts with legal service providers are still in progress.

Further, while private attorneys have begun to take on TAHO-related cases, some hypothesized that it will accelerate over time as there are more proof points of successful cases. Similarly, as more cases are prosecuted by private attorneys, legal service providers, and the OCA, it has the potential to shift landlord behavior more broadly. An attorney suggested that, if the City Attorney's Office “can go after these [landlords] and make an example of them...that would change how landlords act.”

On the bureaucratic side, some emphasized the need for more education and outreach to tenants about their rights and recourse through TAHO. A representative from a community-based organization stated, “we need education [of tenants about TAHO], so they understand the process, resources. [The legal service providers] need to start taking cases, private attorneys need to start getting more familiar and taking on cases and the City Attorney needs to do the same.” While there is a learning curve for both administrative and legal enforcement, and effective adoption of new laws and norms takes time, an intentional and proactive approach to identifying and addressing weaknesses is imperative.

What about LAHD funding constraints?

It is important to note that LAHD is continually asked to take on additional enforcement activities without substantial capacity increases, and a subset of the challenges discussed above suggest capacity and training issues that may be impacted by LAHD funding limitations. So is funding really the problem here?

LAHD's TAHO enforcement is funded through Measure ULA, the city's 4-6% tax on real estate sales over \$5.3M, implemented in 2023. Since its inception, ULA has generated over \$1 billion in revenue (ULA Revenue, 2026). Three percent of the fund is allocated to TAHO enforcement-related activities, with at least 30% of this allocation going towards CBO TAHO programs (Initiative Ordinance ULA, 2022). In FY23-24, Mayor Bass's proposed ULA expenditure plan included \$11.2M in funds for TAHO enforcement specifically, and in FY25-26, it included \$9.2M for TAHO (Drier et al., 2024; Los Angeles Housing Department, 2025a).⁴ While the specific composition of the TAHO Task Force is not available, anecdotally, it does not include any net-new hires or positions, but rather a reallocation of existing LAHD staff capacity. While lack of funding may have affected LAHD's rollout of TAHO enforcement, as the Controller's audit suggests, it seems that LAHD has had ample funding for enforcement since 2023 that could support enforcement through and/or beyond the Task Force.



⁴ FY24-25 TAHO funding allocation was \$0 to "true up" allocations so that cumulative FY23-24 and FY24-25 spending aligned with the prescribed allocations in Measure ULA. Allocations returned to normal in FY25-26 (Keane, 2024).

Image source: [Lily](#)

Discussion and implications

TAHO 2.0's intended intervention of improving attorney incentives to take TAHO cases has meaningfully impacted the viability of TAHO cases for private attorneys, suggesting that the amendments to the ordinance, which were specifically focused on guaranteed attorney fees and damages, are operating as intended. As a result, more tenants are able to seek recourse through private attorneys, who can then recoup their fees if the tenant wins in court. The scalability and potential downstream impact of these changes are still uncertain. More broadly, TAHO offers a venue for tenants to elevate their concerns and experiences of harassment, which had not previously existed. While for most tenants, this may not feel like a win, and it certainly does not change the outcomes of the complaint process, over time, it has the potential to reshape the narrative around harassment and continue to provide a strong foundation for tenant organizing.

However, **it's evident from interviews with tenants, CBOs, LSPs, and city employees that TAHO 2.0's intended intervention was insufficient** – notwithstanding capacity constraints and uncertainties, legal recourse may not be a right-sized solution to the problem of harassment, at least in the near-term or absent robust administrative enforcement. In addition, TAHO 2.0 does not address the fractured and inefficient administrative enforcement process that it seems has plagued TAHO since its inception.

Legally, given challenges with building precedent, managing uncertainty, and scaling legal enforcement, it may be that the TAHO 2.0 amendments should be understood as a longer-term approach to change perceptions and shift incentive structures around harassment as more cases are decided over the coming years. As one attorney said, “some of [the solution] is allowing our systems and institutions and norms to catch up to the law.” However, regardless of if it is operating at scale, legal recourse alone is insufficient, particularly for a problem as pervasive as harassment. While TAHO 2.0 increased capacity for private attorneys, there are, and likely will always be, many more tenants experiencing harassment than private attorneys or LSPs that can take TAHO cases, and not all instances of harassment will be a fit for a lawsuit. In the long-term, there are limitations in relying on legal recourse for tenants as a primary mode of enforcement. While meaningful penalties may have the potential to shift the economic calculus of harassment for individual landlords, they do not change the underlying housing market dynamics that incentivize displacement. This raises questions about how litigation and administrative enforcement can best work in tandem to intervene in the immediate crisis of harassment and change the economics of harassment for landlords.

Bureaucratically, across the LAHD complaint process – from tenants filing complaints, to regional investigators assessing complaints, to escalations to the Task Force and OCA – there is a lack of clarity and transparency and too few consequences for landlords. This muted enforcement may be due to a combination of LAHD capacity constraints, insufficient training, investigator discretion, and/or a lack of clear processes and procedures. Considering the increasing interdependence between real estate capital and state interests (Gustavussen, 2025c; Stein, 2019), there may be more deep-seated cultural or political priorities that motivate support for landlord interests. As Gustavussen asserts, “under financialisation, not only does the relationship between the state and its citizens change, but a landlord's primary client, as Kusiak (2021) writes, is no longer the tenant, but the investor” (Gustavussen, 2025c, p. 3136). Regardless of its roots, the problem is clear– administrative enforcement of TAHO is not delivering meaningful results for tenants, and certainly not at the speed required to intervene in the crisis of harassment.

Structurally, TAHO does not address underlying barriers or justice blockers discussed throughout this report, including landlord/tenant power imbalances and individualized, siloed systems for recourse, nor does it intervene in the economic system that drives harassment. TAHO is only one component of the broader landscape of tenant protections, and thus, effective enforcement requires a coordinated and systematic approach that addresses underlying incentives that drive predatory landlord behavior and proactively penalizes illegal practices. While it's a tall order for any policy or combination of policies to address these types of structural issues, a stronger TAHO with robust bureaucratic and legal enforcement has the potential to ease these issues in conjunction with LA's array of tenant protections.



Image source: Scott Hartman Photo

POLICY RECOMMENDATIONS

Recommendations to strengthen TAHO enforcement include short-term recommendations focused on amending the enforcement process and scaling up litigation and long-term recommendations to address TAHO's structural weaknesses. Given that the legal enforcement process is not yet operating at scale, and more fundamentally, legal recourse is not an option for most tenants, these recommendations are primarily focused on strengthening the bureaucratic enforcement process. Ideally, a robust and effective bureaucratic enforcement process available to all tenants works alongside litigation targeting the worst landlords.

In their 2024 audit of the ordinance, the City Controller's Office put forward recommendations to amend the enforcement process, discussed earlier in the report. While a subset of the Controller's Office recommendations were adopted in TAHO 2.0, based on this research, it's clear that many of the audit's recommendations have not been successfully implemented. Areas of overlap between the recommendations in this report and the recommendations put forward by the Controller's Office are indicated below with an asterix (*).

Short-term: amending the enforcement process

Build a more consistent, clear, and transparent LAHD process

1. Develop a clear, replicable process for assessing complaints, issuing citations, and referring cases (including specific guidelines on what constitutes harassment, evidence thresholds, and requirements for referrals to the Task Force and OCA)*
 - a. Solicit and incorporate tenant and CBO feedback, and share process externally; the process should apply to both regional investigators, where appropriate, and the TAHO Task Force
 - b. Build partnership between LAHD TAHO Task Force and OCA Public Rights Branch by identifying and implementing points of collaboration and meetings
 - c. *While at the time of the audit, LAHD stated that it was in the process of developing a TAHO Task Force Procedures Manual, LAHD materials shared with CBO partners on the enforcement process provide limited insight into the TAHO Task Force review and decision-making process (Mejia, 2025)*
2. Train regional investigators* and LAHD staff on the defined TAHO process and on engaging with tenants experiencing harassment
3. Refer any criminal TAHO violations (e.g., trespassing, assault, vandalism) for criminal prosecution in addition to the standard TAHO enforcement process
4. *Funding dependent* - hire and train additional regional investigators dedicated to TAHO cases*
5. *Funding dependent* - expand the Task Force to include team members dedicated to proactive enforcement of TAHO alongside habitability and RSO violations

Improve externally-facing LAHD process for tenants

1. Increase investigator-tenant communication by:
 - a. Mandating consistent investigator communication with tenants (e.g., bi-weekly) and incorporating compliance into investigator performance assessments
 - b. Providing a direct line of communication for tenants to contact investigators with case-related questions via both phone and email, and if their case is prematurely closed, share new evidence directly to the investigator to reopen the case
2. Create a TAHO-specific complaint portal and include easily accessible LAHD templates and forms (e.g., demand letter template, tenant declaration template, buyout offer refusal form)
3. Assign a trained TAHO staff member to each LAHD office
4. Increase language capacity of LAHD staff, where possible, and provide all communications in English & Spanish, at a minimum*

Implement systems of external governance for LAHD to increase accountability and transparency

1. Institute monthly reviews of a subset of random TAHO cases by an external party, specifically a committee of tenant and CBO representatives, to ensure complaints are processed fairly and funding is effectively allocated (while this could be part of the ULA Citizen Oversight Committee, a separate body with direct oversight may be more effective)
 - a. Governance body could be funded by a small fee based on % of rent paid by all tenants to the city (similar to RSO fee), and the fund managed by a board comprised of city and community representatives (e.g., board of supervisors members, LAHD representatives, mayoral appointments, tenants, CBO representatives)
2. Include CBO and LSP representatives from contract teams on ULA Citizen Oversight Committee to support program evaluation
3. Institute quarterly city council hearings with LAHD leadership to assess enforcement process and progress
4. Develop mechanisms for tenants to provide feedback on investigator interactions (e.g., surveys); results should be incorporated into investigator performance reviews and promotion decisions

Address legal challenges to enforcement

1. Prioritize funding and capacity to begin the LAHD contract with legal service providers
 - a. Invest early in a few big cases to build awareness and confidence around TAHO litigation
2. Educate private attorneys and judges on the role of TAHO in tenant's rights litigation
3. Expand the use of preliminary injunctions and restraining orders to offer immediate relief for tenants in litigation
4. Change language in the ordinance as follows to expand applicability of TAHO:
 - a. Original: Tenant Harassment shall be defined as a landlord's bad faith conduct directed at a specific tenant or tenants that causes the latter detriment or harm.
 - b. Proposed change: Tenant Harassment shall be defined as a landlord's bad faith conduct that causes a tenant or tenants detriment or harm.

Long-term: addressing structural weaknesses

Disincentivize harassment with coordinated policy that penalizes bad landlords and addresses interconnected issues of tenancy

1. Amend the ordinance to increase financial penalties* for TAHO violations, ideally as high as \$100,000
2. Increase consequences for bad landlords with violations across harassment, habitability, RSO, and/or illegal eviction by:
 - a. Developing a consolidated LAHD database tracking landlord and building violations across harassment, habitability, RSO, and illegal evictions, including tracking for TAHO's rent adjustment penalty
 - b. Issuing penalties and mandating remedial training for landlords with repeated violations across any one category or across multiple categories (e.g., financial penalties, loss of permits, loss of ability to rent new units, loss of license)
 - c. Expanding the Rent Escrow Account Program (REAP) to include harassment and RSO violations alongside habitability violations
3. Institute vacancy control for rent-stabilized units through statewide legislation

Intervene in the tenant-landlord power imbalance

1. Develop a new ordinance modeled on San Francisco's Union at Home that separates the right to organize from TAHO, mandates that landlords negotiate in good faith with tenants, and allows tenants to reduce rent for landlord noncompliance
2. Strengthen tenants rights education programs
3. Develop legislation to regulate corporate ownership of rental housing, including the use of investment vehicles, and instead place rental housing under nonprofit, community land trust, and government ownership

This report also asks how community-based organizations and legal service providers can better support tenants in leveraging TAHO— while the limitations of TAHO enforcement are clear and substantial changes are necessary, CBOs and attorneys (both LSPs and private) can place pressure on landlords and the administrative enforcement apparatus to intervene in harassment. In particular, strengthening tenant organizing has the potential to shift power dynamics and pressure landlords and administrative agencies to act. As TAHO enforcement and organizing go hand-in-hand, CBOs should be able to leverage their organizing expertise to support enforcement of TAHO. Attorneys can bolster the work of CBOs and administrative enforcement agencies by taking more TAHO cases, building proof points to scale up TAHO litigation and ultimately influencing landlord behavior. Expediting LAHD's LSP contract is essential to this. On the small claims side, CBOs and LSPs can collaborate to develop curricula and strategies to support tenants navigating small claims court proceedings. Administratively, CBOs supporting tenant navigation can work to mitigate investigator discretion by directly contacting assigned investigators to explain the situation and why it constitutes harassment, as some CBOs are already doing. Finally, CBOs can raise complaints directly to local Council District offices who could support their advocacy efforts by sending cases directly to LAHD's Task Force.

Conclusion

Returning to Sara's experience of harassment, I hope that this report makes clear that Sara's story is not isolated— it's not a one-off greedy landlord mistreating their tenants, but rather a feature of the system that we've created and continue to sustain through our policy choices and our values. While TAHO is aiming to address the feature, it is not equipped, nor I believe intended, to address the system.

Intervening in harassment isn't just about a specific moment or action— it's about changing (1) if and how housing is incorporated into our financial systems and regulated and (2) how we conceive of property, tenancy, and tenant-landlord relationships.

Taking this broader view, it's easy to be cynical, and this report certainly does not look at TAHO with rose-colored glasses. However, TAHO is an important product of a long road of organizing and advocacy, and a durable though imperfect outcome of the destabilization of our systems that the pandemic wrought. TAHO may need time to mature, but its shortcomings are an opportunity for us to think more expansively about constructing effective policy interventions— relying on the same enforcement approaches and structures in the context of a deeply imbalanced system weighted against tenants will not work. Maybe even more so than the policy itself, enforcement is stymied by justice blockers. Policy that does not consider enforcement mechanisms or the context in which enforcement is taking place may always be insufficient. Effectively legislating harassment requires an expansive and integrated approach that considers the interconnected drivers and outcomes of harassment— and thus, TAHO urges us to take a broader, more creative approach to our policy architecture.

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APPENDIX

1. Data Sources and Limitations

The data was provided by LAHD via a California Public Records Act Request. It was provided in two data sets, one ranging from May 2024 to May 2025, and another ranging from May 2025 to September 2025. Despite requesting consolidated data for 2024-2026, it was not provided at the time of writing. The two data sets received contain slightly different fields, limiting this analysis. Below is a description of the fields included in each data set.

Fields contained in both data sets:

- Case Number
- Address
- Status
- Date Opened
- Date Closed

May 2024 to May 2025 fields only (5392 unique cases):

- Allegations (Harassment, Eviction, Reduction of Services, Buyout, etc.)

May 2025 to Sept 2025 fields only (1913 unique cases):

- Description / Nature of Harassment (provided by investigators)
- RSO status
- Assessor Parcel Number (APN)

Description of Harassment

In analyzing harassment description data, I coded investigator descriptions of harassment into 17 overarching categories based on the examples of harassment enumerated in the ordinance as well as 6 "other" categories that do not fall into one of the 17 enumerated examples. The condensed 23 descriptions are outlined in the table below.

Harassment Description, Condensed

- Abuse of right of access to the unit
- Attempting to coerce a tenant to move out by offering payment
- Disclosing immigration/citizenship
- Disclosing tenant information to any govt agency
- Engaging in activity prohibited by federal, state, or local housing anti-discrimination laws
- Eviction based on false reasons
- Failure to make timely repairs
- Inquiring as to a tenant's immigration/citizenship status
- Interfering with tenant's right to privacy (except as permitted by law)
- Interfering with the quiet enjoyment or habitability of the unit
- Other

- Other - Illegal charges not part of lease (e.g., illegal rent increase, parking, damage, pets)
- Other - Intentional damage to unit or tenant’s personal belongings, including theft
- Other - Neglect of landlord responsibilities (e.g., non responsiveness, failure to provide documentation, failure to resolve conflicts)
- Other - Sexual harassment or inappropriate behavior
- Other - Utility shut-offs
- Other repeated acts of such significance causing a tenant to move out
- Refusing lawful rent
- Representing that the tenant is required to move out from (Misrepresentation, concealment, or omission of material fact)
- Retaliation for tenant organizing, filing complaints, refusal to move out, or other issues
- Taking away services provided in the lease (housing services)
- Threatening a tenant with physical harm (verbal, physical)
- Unilaterally changing terms of tenancy

2. LA City Eviction Notices (not filings)

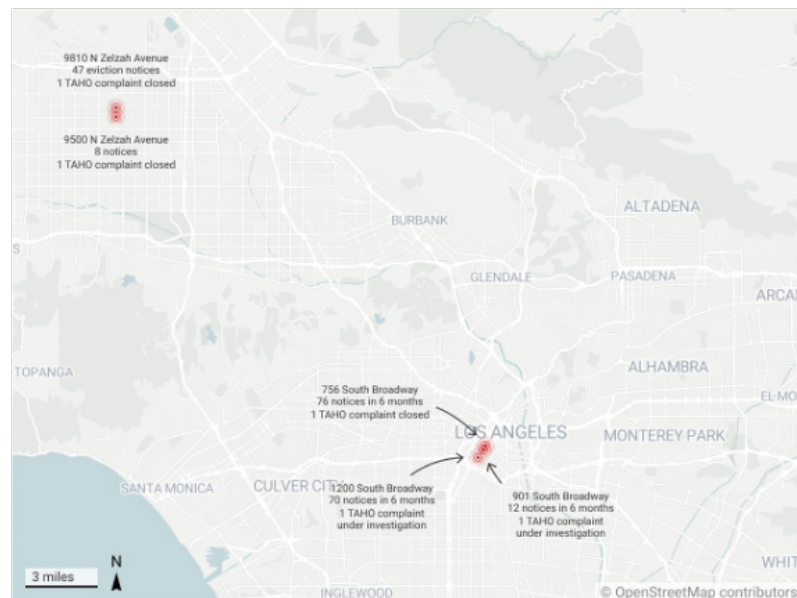
Eviction Notices by CD
(20,000+ notices)

- CD14: 34,441
- CD13: 28,372
- CD3: 23,401
- CD1: 22,800
- CD10: 22,439

Eviction Notices by Zip
(10,000+ notices)

- 90028: 14,585 (Hollywood)
- 90012: 11,673 (Downtown, Chinatown)
- 90017: 10,379 (Westlake, Downtown)
- 90015: 10,302 (Downtown)

Buildings with TAHO complaints and 10+ recorded eviction notices from 2023 to 2025



Created with Datawrapper

Looking at overlap between eviction notices and TAHO complaints, of the eviction notices sent from February 2023 to September 2025, there are 282 notices at 29 unique addresses with TAHO complaints filed. Many of these addresses have multiple eviction notices– in one case, a landlord filed 76 eviction notices at the same address within 6-months.



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