

# CLAIM FOR DAMAGES

## TO PERSON OR PROPERTY

**INSTRUCTIONS:**

1. Claims for death, injury to person or to personal property must be filed not later than six months after the occurrence. (Gov. Code Sec. 911.2)
2. Claims for damages relating to any other type of occurrence must be filed not later than one year after the occurrence. (Gov. Code Sec. 911.2)
3. Read the entire claim and fill out all mandatory fields (\* = **mandatory**) before filing. (Gov. Code Sec. 910, 910.2) THE FAILURE TO INCLUDE MANDATORY INFORMATION MAY RESULT IN YOUR CLAIM BEING RETURNED AS INSUFFICIENT. (Gov. Code Sec. 910.8)
4. If necessary, attach separate sheets to provide full details, referencing the appropriate claim section number. SIGN EACH SHEET.
5. Attach any relevant documents or reports supporting your claim.
6. Claim must be signed at the bottom of page 2.
7. Claims can only be filed with the City Clerk. (Gov. Code Sec. 915a) Claims can be filed online at <https://claims.lacity.org/>, in person or mailed to: CITY CLERK, 200 NORTH SPRING STREET, ROOM 395, CITY HALL, LOS ANGELES, CA 90012
8. FAXED OR EMAILED CLAIMS WILL NOT BE ACCEPTED.

 RESERVE FOR FILING STAMP  
 CLAIM NO. \_\_\_\_\_
**TO: CITY OF LOS ANGELES****1. CLAIMANT INFORMATION:**

\*Name: Kristin Crowley Date of Birth: \_\_\_\_\_  
 Email Address: \_\_\_\_\_ \*Phone Number: \_\_\_\_\_  
 \*Address: \_\_\_\_\_

☒ Indicate if claim notices or communications should be sent to someone other than the claimant (e.g. attorney or insurance representative). **If checked, complete the information below:**

\*Name: Genie Harrison, Esq.; Mia Munro, Esq. \*Relationship to Claimant: Attorneys  
 Email Address: [genie@genieharrisonlaw.com](mailto:genie@genieharrisonlaw.com); [mia@genieharrisonlaw.com](mailto:mia@genieharrisonlaw.com) \*Phone Number: 213-805-5301  
 \*Address: 23975 Park Sorrento, Suite 202, Calabasas, CA 91302

**2. FACTUAL ALLEGATIONS:****\*How did damage or injury occur?**

Mayor Karen Bass and City of Los Angeles retaliated against former LAFD Fire Chief Kristin Crowley because of Crowley's speech and concerted activities protected under the Labor Code and the state and U.S. Constitutions. Crowley engaged in protected speech to pull the curtain covering LAFD budgetary and other issues that left Angelinos exposed to danger. To punish Crowley for her protected speech and to tarnish Crowley's stellar reputation, Bass made repeated malicious and patently false public statements about Crowley and removed Crowley from her position as Fire Chief based on those false statements. Bass' actions and statements against Crowley were solely for Bass' personal gain at the expense of Angelinos, designed to scare City employees from telling truths that Bass did not want exposed and to misdirect public scrutiny of Bass' mistakes to Crowley, a career firefighter who has dedicated her life to the safety of Angelinos. See Attached.

\*Please provide the date and time of the damage or injury. February 21, 2025 through present

\*Where did damage or injury occur? Please provide the closest street address or cross-street and use the diagram on page 2.

Office of Mayor and City Hall, 200 N Spring Street, Los Angeles, CA 90012.

**\*Why do you claim the City of Los Angeles is responsible for your damage or injury?**

As Crowley's employer, City of Los Angeles is responsible for its removal of Chief Crowley as Fire Chief and for Bass' actions conducted in her capacity as Mayor of Los Angeles, including malicious and defamatory statements made about Crowley purportedly on behalf of City of Los Angeles.

**SEE PAGE 2 (OVER)****THIS CLAIM MUST BE SIGNED ON REVERSE SIDE**

**3. WITNESSES AND INVOLVED PARTIES:**

**\*Give the names of City employees and their contact information, City vehicle license plate numbers, and the City department or bureau responsible for the act or omission you claim caused the damage or injury, if known.**

Mayor Karen Bass, City of Los Angeles (200 N. Spring St. Los Angeles, CA 90012). Others who may have contributed to Mayor Bass' actions are unknown at this time but may include her staff.

Did you report the act or omission? If so, please identify who you reported it to, provide their contact information and any report, service or claim numbers.

Yes, Chief Crowley reported Mayor Bass' acts or omissions to the Los Angeles City Council, in the presence of the City Attorney's Office and the Office of Mayor Bass, at a hearing held on March 4, 2025.

Please list the names and contact information for Witnesses, Doctors and Hospitals

See Attachment A.

**4. DAMAGES:**

**\*What damage or injuries do you claim resulted?** Loss of wages and benefits, Reputational loss, Emotional Distress

**\*What is the total amount of your claim:** \$ In excess of \$25,000

**\*Itemize your damages:** ☒ Property Damages: \$ 0 ☒ Bodily Injury: \$ Emotional distress in excess of \$25,000

☒ Other (specify) Labor Code penalties; Defamation per se; Attorney's fees; Costs; Punitives : \$ According to proof

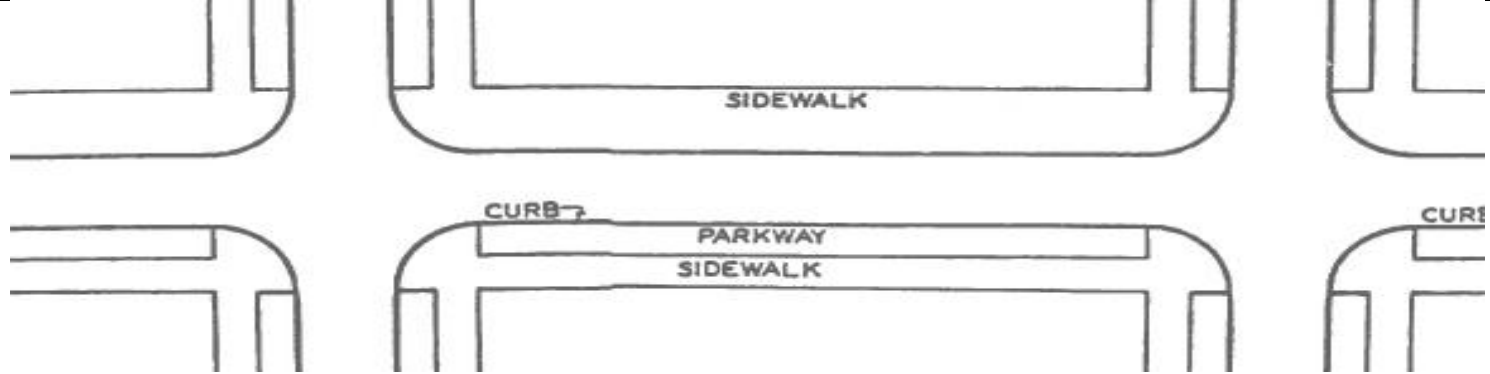
Attach any relevant documents or reports supporting your claimed damages.

**5. INSURANCE:**

If you had insurance at the time of the act or omission, please give the name and contact information for your insurance company, handling representatives and any amounts paid:

**6. ACCIDENT DIAGRAM:**

For all accident claims, place the street names where the accident occurred and the nearest cross-streets on the diagram, while indicating the location of the accident with an "X". Note: if the diagram does not fit the situation, please attach your own diagram.



I declare under penalty of perjury that the foregoing, including any attachments, is true and correct:

**\*Signature of Claimant or Person Filing on Claimant's Behalf**

Genie Harrison and Mia Munro 8/20/2025  
Print Name Date

Attorneys

**Relationship to Claimant**

**CRIMINAL PENALTY FOR PRESENTING A FALSE OR FRAUDULENT CLAIM IS IMPRISONMENT OR FINE OR BOTH. (PENAL CODE §72)**

**Attachment A**  
**to Kristin Crowley's Claim for Damages Form**

**Claimant:** Kristin Crowley, c/o Genie Harrison Law Firm (Genie Harrison, Mia Munro).

**Respondents/Government Agency Causing Injury:** City of Los Angeles, Karen Bass, Does 1 through 20.

**Claims:** Defamation; Retaliation in violation of California Labor Code sections 98.6, 232.5, 1050, 1101, 1102, 1102.5; Retaliation in violation of Article 1, Section 2 of the California Constitution; Retaliation in violation of the First Amendment of the United States Constitution; Negligence.

**Employees Causing the Injury, Damage, or Loss:** Include but are not limited to: Mayor Karen Bass, current and former staff of Office of Mayor Karen Bass (including but not limited to Brian Williams, Zach Seidl, Matt Hale, and Celine Cordero), Members of the Board of Fire Commissioners (including but not limited to Genethia Hudley-Hayes), Members of the LAFD, Members of LA City Council (including but not limited to Marqueece Harris-Dawson), Members of City Administrator's Office (including but not limited to Matt Szabo), current and former City of Los Angeles staff and employees including, but not limited to, Ronnie Villanueva, and other employees of the City of Los Angeles whose participation in the events causing injury, damage, or loss, is not presently known. Known location of employees is City of Los Angeles, where they work for the City of Los Angeles, including at 200 N. Spring St. Los Angeles, CA 90012, and 200 N. Main Street, Los Angeles, CA 90012.

**Dates of injury:** From February 21, 2025, through present, and continuing.

**Places of injury:** Los Angeles City Hall and Office of Karen Bass (200 N. Spring St. Los Angeles, CA 90012), and locations throughout City of Los Angeles, State of California, and United States, including, but not limited to, where false statements made by Bass about Crowley were published, re-published, read, and viewed.

**Amount of damages:** In excess of \$25,000; this case would be an unlimited civil case. Current estimate of Kristin Crowley's economic damages, including future lost wages, is over \$25,000, but the exact amount of these damages will ultimately be determined by the jury. Crowley seeks damages as determined by a jury for lost wages and benefits, emotional distress, and reputational damages, as well as punitive damages with respect to her claims against Karen Bass. Crowley additionally seeks Labor Code penalties, including penalties under Labor Code sections 98.6 and 1102.5, treble damages under Labor Code section 1050, and Crowley's reasonable attorney's fees and costs as determined by a judge.

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## **Executive Summary:**

Kristin Crowley, a 25-year veteran of the Los Angeles Fire Department (LAFD), has filed a tort claim alleging that Mayor Karen Bass orchestrated a campaign of misinformation, defamation, and retaliation to protect her political image while concealing the extent to which she undermined public safety.

As Fire Chief, Crowley repeatedly warned of the LAFD's worsening resource and staffing crisis. She submitted detailed reports showing how aging infrastructure, surging emergency calls, and shrinking staff left the city at risk. Despite these warnings, Mayor Bass and her administration cut the LAFD's operating budget for fiscal year 2024–2025 by \$17.6 million and eliminated positions critical to maintaining fire engines, trucks, and ambulances.

In early January 2025, when the National Weather Service warned of severe wind conditions, the LAFD pre-deployed augmented resources in strategic positions following established protocols developed with subject matter experts. When the Palisades Fire erupted, Bass — then out of the country — initially praised the department's preparedness, even issuing a press release highlighting its deployment strategy. But as criticism mounted over her absence, Bass reversed course. She sought to shift blame to Crowley, falsely stating that Bass was not aware of the nationally anticipated weather event, that Crowley sent 1,000 firefighters home who could have fought the blaze, and misrepresenting the department's budget — claims contradicted by public records and Bass' own prior statements.

Crowley alleges that these false statements were not mistakes but part of a deliberate strategy to scapegoat a career firefighter and divert scrutiny from the Mayor's decisions. After Crowley confirmed publicly that budget cuts had weakened the department's readiness, Bass retaliated. Within weeks, Crowley was removed as Chief, replaced, and accused of refusing to conduct an after-action report — another false claim and one Bass never raised with Crowley. Since then, Bass has engaged in an ongoing public smear campaign aimed at discrediting Crowley's character and decades of service.

Crowley now seeks accountability for the Mayor's calculated efforts to mislead the public. This case highlights what happens when political leaders prioritize their personal image over truth and transparency. Angelenos — and the firefighters who risk their lives with insufficient resources — deserve honesty and respect, not false narratives designed to shield the Mayor from the consequences of her own decisions.

## **Description of injuries, damages, and loss:**

Kristin Crowley has devoted her life and career to keeping the City of Los Angeles, and the city's firefighters who serve it, safe. Crowley has been a public servant for the Los Angeles Fire Department (LAFD) for over 25 years, serving in positions of

Firefighter, Paramedic, Engineer, Inspector, Captain I, Captain II, Battalion Chief, Assistant Chief, Deputy Chief and Fire Marshal, Chief Deputy, and Fire Chief. In all of Crowley's positions at the LAFD, she has committed to risking her life to protect the City of Los Angeles (the City) and has always kept the safety of Los Angeles and its firefighters as her top priority.

In March 2022, Mayor Eric Garcetti nominated, and the Los Angeles City Council (City Council) approved, Crowley's appointment as Chief of the LAFD (Fire Chief), leading one of the largest firefighting departments in the country. Crowley was qualified and respected, and Angelinos and LAFD employees alike widely supported her appointment.

#### **A. Crowley Relentlessly Advocates for the Budget and Resources the LAFD Needs to Keep Citizens and Firefighters Safe**

As Fire Chief, from March 2022 until February 21, 2025, Crowley relentlessly and tirelessly advocated for the LAFD to have the resources it needed to keep Angelinos and the firefighters that served them safe. Recognizing wide gaps in resources and services that needed to be improved, year after year, Crowley repeatedly and consistently sounded the alarm to Mayor Karen Bass, the Board of Fire Commissioners, and the City Council. Crowley unambiguously communicated that the LAFD's resources were not sufficient to address the growing public safety needs of the City. Each year, Crowley submitted requests to increase the LAFD's budget so the LAFD would have the resources and infrastructure it desperately needed to protect Los Angeles.

At public meetings in 2023 and 2024, Board of Fire Commissioners President Genethia Hudley-Hayes agreed with Crowley that the LAFD was underfunded and required more funding to support Los Angeles' growing public safety needs. President Hudley-Hayes stated that she would meet with Mayor Karen Bass regarding the LAFD's need for an increased budget.

From March 2023 through December 2024, Crowley repeatedly submitted and provided evidence and reports to the Board of Fire Commissioners and the Mayor's Office regarding the LAFD's need for increased resources and funding. Throughout Crowley's tenure as Fire Chief, Crowley also repeatedly met with Mayor Bass' office to explain the LAFD's need for more resources to keep Angelinos safe, in part due to the dramatic increase in calls for service from the unhoused population.

On March 15, 2023, Crowley submitted a Report to the Board of Fire Commissioners reporting that the LAFD's response times to emergency incidents were increasing, partially due to low staffing, increasing emergency calls, and increasing traffic in the City. [Exhibit 1].

On May 31, 2023, Crowley submitted a Report to the Board of Fire Commissioners reporting an independent assessment of the LAFD's services, including a finding that "for long, consecutive hours of the day, large numbers of fire crews are busy

with only EMS calls, leaving the area underserved for an immediate need fire or rescue response, even when many of the busiest stations have multiple crews assigned to them.” Crowley reported that the independent assessment recommended increased staffing and adding one fire station [Exhibit 2].

On approximately November 8, 2023, Crowley hosted Deputy Mayor of Public Safety Brian Williams and Deputy Mayor of Infrastructure Randall Winston for a walkthrough of the LAFD’s backup dispatch center, which was in grave disrepair - with exposed wires, water leaks, unstable structuring and outdated and malfunctioning dispatch equipment - and was unsafe for firefighters. The City clearly was not prepared for emergencies should anything happen to its primary dispatch center. Crowley’s objective was to ensure that Bass, through her top staff, understood the LAFD’s immediate need for resources, infrastructure, and increased budget related to keeping citizens and firefighters safe.

On December 28, 2023, Crowley submitted a Report to the Board of Fire Commissioners proposing a budget for Fiscal Year 2024-2025 [Exhibit 3]. Crowley requested an LAFD budget of \$1.1 billion, including \$914 million for the operating budget and \$170 million for other items, including fleet replacement and facilities maintenance. In the Report, Crowley outlined the need for increased funding for training dispatchers, wildfire suppression, fire prevention support, essential technology replacement, staffing increases, and ensuring that field resources are properly and safely equipped to deliver public safety services.

On February 2, 2024, the City of Los Angeles implemented a process called Prioritized Critical Hiring (PCH) as part of a citywide hiring freeze of civilian positions. The hiring freeze impacted the LAFD, where many critical vacancies still needed to be filled, including those related to the repair and maintenance of emergency ambulances, fire trucks, and fire engines. The City then used the freeze as a justification for not filling the critical LAFD civilian vacancies and later deleted the positions altogether as a cost-saving strategy.

From January 2024 until July 2024, Crowley repeatedly requested in writing that the City permit the LAFD to fill the critical civilian vacancies, many of which were related to repair and maintenance of emergency ambulances, fire trucks, and fire engines. During this time, Crowley also met with the Mayor’s office on multiple occasions to request the Mayor’s help in filling the critical civilian positions. Although the City’s PCH Committee promised it would meet with the LAFD to understand the impact of, and assess whether to fill, the vacancies at the LAFD before any of the unfilled positions were deleted, the meeting never happened. The City then deleted the positions before having the promised meeting.

On April 22, 2024, Crowley submitted a Report to the Board of Fire Commissioners describing recent storm damage to fire stations and the need for repairs and improvements at the stations [Exhibit 4]. In the Report, Crowley advised that: “nearly 50% of the Department’s fire stations were affected, causing water intrusion

through roofs, ceilings, walls, windows, even causing some flooding.... There are 106 fire stations in total, half of which are over 50 years old. The General Services Department, Building Maintenance Division faces constraints in the assistance and funding it can offer. The combination of aging facilities and insufficient funding have resulted in deteriorating infrastructure and the compromised health and safety of its members. Without adequate funding for necessary repairs and improvements, the current conditions of these aging stations will only deteriorate further over time.”

In April 2024, Mayor Bass released her budget proposal for Fiscal Year 2024-2025 [Exhibit 5]. Rather than propose an increase to the LAFD’s budget as requested by Crowley, Bass proposed to *decrease* the LAFD’s operating budget by approximately \$23 million (from the 2023-2024 budget of \$837,191,237 to \$814,281,952) and eliminate 71 positions at the LAFD.

On May 2, 2024, Crowley appealed to the City Council, at its Budget and Finance Hearing, to increase the LAFD’s budget. During the hearing, Crowley expressed the LAFD’s dire need for additional resources, explaining that there had been a 55% increase in calls for the LAFD’s lifesaving services since 2010, yet the Department had 68 fewer sworn personnel. Crowley advised that the LAFD’s service delivery model was no longer sustainable and that the LAFD could not do more with less. Crowley advised that the LAFD needed the funding and support that matched the enormity of its responsibilities in keeping Los Angeles safe.

On May 23, 2024, the City Council largely approved Mayor Bass’ proposed 2024-2025 budget, reducing the LAFD’s operating budget from the prior year by \$17.6 million (from \$837,191,237 to \$819,637,423) and eliminating 61 positions. [Exhibits 6, 7] In contrast, the Mayor and City Council increased the Los Angeles Police Department’s budget by over \$125 million, from \$1,855,678,740 to \$1,981,610,477. [Exhibits 6, 7]

On July 1, 2024, the Fiscal Year 2024-2025 began with the LAFD working with a budget that was \$17.6 million lower than Fiscal Year 2023-2024, and with 61 fewer positions, including 20 fewer personnel to repair and maintain emergency ambulances, fire trucks, and fire engines. [See Exhibits 6, 7]

On July 8, 2024, Crowley submitted a Fiscal Year 2024 General Manager Review to Mayor Bass’ office. The Review stated that: “During the 23/24 fiscal year the LAFD responded to a historic amount of incidents: 515,906 (82 % EMS). Coupled with that, the Department experienced an unprecedented number of retirements that occurred in a narrow window of time. During this time, the LAFD faced staffing shortages that resulted in temporarily closing resources throughout the city. However, we were able to navigate this challenge because we had anticipated the exodus and implemented effective strategies to address field vacancies. Multiple classes of recruits were appropriately funded so we could hire, train, and deploy these new firefighters in the field (214). With an unprecedented \$17.5 M decrease in our operating budget for FY 24/25, we will have to be more calculated in deploying our core services by finding creative and effective

solutions, leveraging technology like 311 services as well as reprioritizing resources.” The Review also detailed that an “analysis is being conducted in partnership with a well-known international labor group to identify additional gaps in service and opportunities for improved allocation of resources. Based on the findings and recommendations of the initial SOC [Standards of Cover] study, the Department developed a three-year implementation plan for the needed resources. In the budget request for FY 24/25, 174 positions outlined in the first year of the implementation plan were requested. Unfortunately, only five of these positions were authorized.” The Review also outlined that: “In light of the budget constraints of FY 24/25, the Department will continue to reevaluate strategies and tactics it developed to carry out the LAFD’s Mission outlined in the 23-26 Strategic Plan. A thorough assessment and reprioritization of services provided are required...” [See Exhibit 8] Neither Mayor Bass’ office nor the City disputed the accurate statements in Crowley’s General Manager Review that the LAFD’s Fiscal Year 2024-2025 operating budget had been cut.

On August 9, 2024, Crowley attended a meeting with Mayor Bass’ office to discuss ongoing problems with the LAFD’s emergency ambulances, fire engines, and fire trucks, which were in disrepair and lacked adequate resources. Crowley advised Bass’ office about the number of rigs that were out of service and again requested an increase in positions for personnel to repair and maintain emergency ambulances, fire trucks, and fire engines – to bring back the critical positions that had been lost by Mayor Bass’ budget cuts to the LAFD.

On August 30, 2024, Crowley submitted an Interim Budget Request for Fiscal Year 2024-2025, requesting to add seven personnel to repair and maintain emergency ambulances, fire trucks, and fire engines that were deleted by the Mayor’s Fiscal Year 2024-2025 budget. [Exhibit 9]

On September 5, 2024, September 23, 2024, October 24, 2024, and December 9, 2024, Crowley submitted reports to Deputy Mayor Brian Williams, City Administrative Officer (CAO) Matt Szabo, and Deputy Mayor of Finance, Operations, and Innovations Matt Hale explaining ongoing issues with City’s new payroll program, called Workday. Crowley explained that: “The implementation of Workday has resulted in significant payroll discrepancies for employees. These errors have far-reaching implications, including financial hardship for employees, [and] increased workload for payroll and personnel staff.” Again, the LAFD was unable to adequately and timely address these administrative problems due to inadequate staffing and insufficient funding for the LAFD administrative staff.

On September 11 and 12, 2024, Crowley again met with Bass’ office to discuss inadequate funding and staffing for the LAFD’s maintenance and repair for emergency ambulances, fire engines, and fire trucks, and the need for additional Human Resources staff to address ongoing issues and concerns with the City’s new Workday payroll system.



On September 16, 2024, Crowley submitted a Report to the Board of Fire Commissioners [Exhibit 10] with an Interim Budget Request for Fiscal Year 2024-2025 to add sixteen positions to address the ongoing need for repair and maintenance of emergency ambulances, fire engines, and fire trucks. As stated in the Report, these positions “were deleted in the FY 2024-2025 Budget but are critical to provide maintenance to the Department’s fleet and reduce out of service time.” Crowley explained “[t]he LAFD emergency fleet is in a constant state of disrepair attributable to years of deferred maintenance, deferred vehicle replacement, increased call volume, and the lack of resources for adequate staffing and replacement parts. Restoration of these positions will provide a minimum staffing level to maintain a basic level of readiness in the field which includes a minimum level of reserve apparatus.”

On or around October 29, 2024, Crowley’s Performance Review and Annual Goals were due from Mayor Bass. Although Bass’ office initially scheduled and then rescheduled a meeting for Crowley’s annual review for December 2, 2024, Bass’ office canceled and failed to reschedule that meeting. Mayor Bass, therefore, did not meet with Crowley about her performance and annual goals.

In November and December 2024, the office of the CAO instructed the LAFD to engage in a budget reduction exercise, evaluating how a further and additional decrease of another 6% to the LAFD’s already-deficient budget (i.e., an additional \$48.8 million cut) would impact the LAFD’s operations. Crowley advised the CAO and Mayor Bass that the LAFD could not take another budget cut; Bass nevertheless instructed Crowley to engage in the budget reduction exercise. Crowley engaged in the exercise as instructed, concluding that an additional budget cut of 6% would require the closure of 16 fire stations and the elimination of 300 firefighter positions. Crowley concluded that the LAFD could not take the proposed budget cut without significantly further compromising public safety.

On November 18, 2024, Crowley submitted a Report to the Board of Fire Commissioners advising of the results of a study by the International Association of Fire Fighters (IAFF) measuring the effectiveness of the LAFD deployment model [Exhibit 11]. Crowley reported as follows:

- “In many ways, the current staffing, deployment model, and size of the LAFD have not changed since the 1960s. The population of the City of Los Angeles has increased from 2,479,015 in 1960 to 3,898,747 in 2020 while the LAFD shrank from 112 stations to 106 stations. During that span of time the staffing did not grow proportionally. At the same time, the call volume increased from 100,985 incidents in 1969 to 504,604 incidents in 2023.”
- “An analysis of the 90th percentile of all incidents indicates that the overall response time of LAFD resources has increased from 6:51 in 2018 to 7:53 in 2022. This dramatic increase is nearly double the time the NFPA recommends for first-arriving units.”
- “The IAFF recommends increased staffing and infrastructure to allow additional units to serve the growing population adequately.... Simply put, the

LAFD is half the size that the NFPA recommends a professional fire department to be.”

- “The LAFD currently uses a staffing model that was in place before the invention of the cell phone and increased callers. Call volume into the dispatch center has more than quadrupled with no increase in staffing.”
- “The IAFF recommends an additional 84 fire stations.”
- “The LAFD is committed to being the premier, all-hazard public safety and emergency service provider that exceeds the expectations of the diverse communities we serve. This commitment is unattainable without the requisite resources, staffing, and infrastructure to meet the increased population and complexity of a modern fire service response. The overall response time, nearly double the national recommendation, indicates that additional resources are needed as soon as possible fiscally. Without funding, the poor response worsens as the population increases.”

On December 2, 2024, Crowley submitted a Report to the Board of Fire Commissioners requesting a total budget of \$1.1 billion for Fiscal Year 2025-2026 [Exhibit 12]. Crowley stated in the Report that, “The Department recognizes the extreme fiscal challenges ahead and went through an exhaustive process in evaluating our budget priorities and identifying requests. The Proposed Budget reflects the Department’s minimal needs to meet service demands in a backdrop of a 55% increase in call volume since 2010 for critical emergency medical, fire suppression and fire prevention services.”

On December 4, 2024, Crowley submitted another Report to the Board of Fire Commissioners, this time regarding Service Impacts on Operations at the LAFD [Exhibit 13]. In the Report, Crowley again rang the alarms about how the LAFD budget cuts in Fiscal Year 2024-2025 had severely impacted the Department’s ability to serve the community. In the Report, Crowley stated:

- “The Los Angeles City Fire Department (LAFD) is facing unprecedented operational challenges due to the elimination of critical civilian positions and a \$7 million reduction in Overtime Variable Staffing Hours (V-Hours). These budgetary reductions have adversely affected the Department’s ability to maintain core operations, such as technology and communication infrastructure, payroll processing, training, fire prevention, and community education.”
- “In addition to these impacts, **the reduction in v-hours has severely limited the Department's capacity to prepare for, train for, and respond to large-scale emergencies, including wildfires**, earthquakes, hazardous material incidents, and large public events. Specialized programs and resources, such as Air Operations, Tactical EMS Units, Disaster Response, and Community Emergency Response Teams (CERT), which rely heavily on v-hours, are now at risk of reduced effectiveness. This report provides an in-depth analysis of these cascading impacts, underscoring the critical need for resource restoration to ensure operational readiness, firefighter safety, and the delivery of high-quality public service.”

- “Despite the LAFD’s unwavering commitment to delivering exceptional service to the City of Los Angeles, **the elimination of critical civilian positions and the \$7 million reduction in v-hour's funding has significantly hindered the Department's operational effectiveness.** Key impacts include: ... Delayed Maintenance and Upgrades.... Reduced Fire Prevention Capacity.... **The LAFD’s ability to respond to large-scale emergencies, such as wildfires, earthquakes, and hazardous materials incidents, is significantly diminished, increasing risks to both public and firefighter safety.**”
- “Addressing these deficiencies is imperative to ensuring the department’s ability to deliver life-saving services, uphold firefighter safety, and sustain public trust in its ability to respond to emergencies and protect the community.”

The Board of Fire Commissioners approved Crowley’s December 4, 2024, Report addressing the impact of the Mayor’s cut to the LAFD’s Fiscal Year 2024-2025 operating on the LAFD’s services. Nobody at Mayor Bass’ office disputed the accuracy of the statements in Crowley’s Report.

## **B. The Predicted January 7, 2025, Fire Weather Was Well Known by Bass**

From January 2, 2025, through January 6, 2025, the National Weather Service for Los Angeles issued and distributed national advisories, including to Mayor Bass’ administration, about expected dangerous winds in Los Angeles anticipated from January 7, 2025, through January 9, 2025. [See Exhibit 14]

On January 3, 2025, the day after the National Weather Service for Los Angeles issued its first national advisory about the expected dangerous winds, Mayor Bass issued a short letter to Crowley, General Manager of the Emergency Management Department (EMD) Carol Parks, Chief of the Police Department James McDonnell, City Clerk Holly Wolcott, and City Council President Harris-Dawson, stating that Mayor Bass would be traveling “out of state” from January 4, 2025, until January 8, 2025 [Exhibit 15]. Bass made no further communication to Crowley about her “out of state” travel prior to the outbreak of the January 7, 2025, Palisades Fire.<sup>1</sup> Nor did Bass or her office communicate to Crowley at any time prior to the Palisades Fire that Bass would, in fact, be *out of the country*, in Ghana, not just “out of state.”

From January 4, 2025, through January 6, 2025, the EMD coordinated with the LAFD and Mayor Bass’ office, among other stakeholders, to prepare for the anticipated dangerous wind event. These actions were consistent with the EMD's regular practice of coordinating with the other City departments for Citywide preparedness for weather-related and other emergency events.

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<sup>1</sup> There was no previous practice or history of Crowley personally calling Mayor Bass about every expected weather emergency, whether or not Bass was traveling “out of state.” Instead, Crowley’s and Bass’ key point of contact for expected weather emergencies was the EMD.

At 1pm on January 6, 2025, as part of its responsibility for Citywide preparation for weather-related and other emergency events, the EMD coordinated a National Weather Service briefing for city leaders and first responders regarding the anticipated dangerous wind event expected to hit Los Angeles on January 7, 2025. LAFD personnel, among others in Mayor Bass' administration, attended the briefing, as was normal practice.

Later, on January 6, 2025, Crowley met with Bass' Acting Deputy Mayor of Public Safety and Deputy Chief of Staff, Celine Cordero, to discuss Crowley's ongoing concerns about the Mayor's prior and additional proposed LAFD budget cuts that had already impacted and would further impact the Department's ability to operate and protect the City. Crowley advised Cordero that the CAO's and Bass' proposed additional 6% budget reduction would require the LAFD to close 16 of its fire stations and eliminate over 300 firefighter positions, which would further jeopardize the safety of the City. Crowley reminded Cordero of the budget cuts the LAFD had already taken against Crowley's recommendation and of the LAFD's need for more funding to keep Los Angeles safe. Crowley reminded Cordero about the LAFD's Interim Budget Request to partially make up for lost positions due to the prior budget cuts, and about the IAFF Report regarding the dire situation the LAFD was in due to lack of resources and aging infrastructure.

On the evening of January 6, 2025, the EMD issued an advisory message about "Dangerous Winds and Extreme Fire Risk for Los Angeles Mountains, Foothills, and Valleys." [Exhibit 16]. The City also issued Emergency Alerts, sharing a LAFD warning regarding "EXTREME FIRE DANGER with DANGEROUS WINDS...Tuesday morning to Wednesday afternoon." Bass' staff was aware of the multiple advisories issued by her General Manager at the EMD about the extreme weather conditions.

On January 6, 2025, demonstrating her awareness of the National Weather Service's alerts that began four days earlier, Mayor Bass alerted her constituents about the anticipated weather event to begin the next morning. [Exhibit 17].

### **C. The LAFD Followed Long-Established Plans and Procedures Leading Up to the Palisades Fire**

Throughout Crowley's tenure as Fire Chief, the LAFD executed and followed well-established and documented practices and procedures regarding deployments in anticipation of and during emergencies. The LAFD's deployment strategies were created and agreed to by dozens of subject matter experts and emergency operations staff, and were finally approved by the LAFD's Deputy Department Commander (DDC).

On January 6, 2025, in anticipation of the January 7, 2025, weather event, the LAFD followed its planning procedures for anticipated disasters consistently with over a decade of practice. On January 6, the LAFD attended weather meetings with subject

matter experts and emergency operations staff, where dozens of stakeholders jointly decided on pre-deployment and pre-positioning plans for January 7, 2025, which were finally approved by the LAFD DDC

On January 6, 2025, a large area of Los Angeles was identified as at risk for high winds and potential fires. The LAFD planned for potential fires, not knowing precisely where fires might break out, while also continuing to provide emergency services for the entire City. Consistent with a decade of the LAFD's practices, and based on agreement with dozens of subject matter experts, the LAFD pre-deployed and strategically placed resources at pre-selected neighborhood fire stations, near areas prone to wildfire, and near multiple freeways to ensure rapid responses, while keeping other fire engines, fire trucks, firefighters, and ambulances dispersed throughout the City to provide other ongoing emergency services. The LAFD therefore pre-deployed 24 Fire Engines, 3 battalion command teams, 5 brush patrols, 2 water tenders, additional staffing, additional air operations personnel, and additional dispatchers, totaling approximately 128 pre-deployed and augmented personnel.

On the morning of January 7, 2025, the LAFD staffed all its front-line fire engines (including all the 40 engines that Bass later falsely stated sat "idle"), fire trucks, and paramedic ambulances. The LAFD also hired and detailed additional firefighters to staff augmented resources in anticipation of the weather event.

Though the LAFD could not have precisely predicted the exact timing, location, conditions, or resource requirements for the Palisades Fire, consistent with the recommendations of the LAFD's subject matter experts, the Department pre-deployed far more resources in anticipation of the January 7, 2025, winds than it had previously done for many years.

#### **D. The Palisades Fire Erupts; From Ghana, Bass Praises the LAFD's Preparedness**

At approximately 10:20am on January 7, 2025, the Palisades Fire erupted. Shortly after the fire broke, Crowley called Acting Deputy Mayor of Public Safety and Deputy Chief of Staff Celine Cordero and updated her on the active incident. Soon after, Cordero advised Crowley for the first time that Bass was out of the country, in Ghana.

At 10:55am on January 7, 2025, Mayor Bass' office issued a press release titled "City of Los Angeles Announces Preparedness Measures Ahead of Anticipated Dangerous Wind Storm."<sup>2</sup> The press release quoted Bass as stating: "Parts of the Los Angeles region will potentially face one of the most significant wind storms in more than a decade." Bass' press release further stated that: "After the National Weather

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<sup>2</sup> The press release, issued approximately 35 minutes after the start of the Palisades Fire, did not acknowledge the outbreak of that fire.

Service announced a destructive High Wind Watch and a Fire Weather Watch for parts of Los Angeles City on Monday, Los Angeles Mayor Karen Bass mobilized City departments to urgently prepare for the coming storm to ensure the safety of all Angelenos.” The press release outlined the LAFD’s deployment and pre-deployment measures, stating that: “A five-engine strike team...and three three-engine task forces (totaling 14 fire engines) will be pre-deployed at select Neighborhood Fire Stations in-and-near areas prone to wildfire” and that “Additional staffing will be hired for Air Operations, Water Tenders and Metro Fire Communications. Teams are prepared to ensure targeted responses across the city.” [Exhibit 18]

At 11:50am on January 7, 2025, after Crowley again updated Bass’ office on the Palisades Fire, Bass posted a message on X, accurately advising the public that, “In preparation for high winds, LAFD pre-deployed strike teams in and near areas prone to wildfire. Firefighters are now actively and aggressively responding to the #PalisadesFire with support from regional partners.” [Exhibit 19]

At 12:47pm on January 7, 2025, Bass spoke from Ghana to a local Los Angeles radio station KNX 97.1 about the Palisades Fire. During the recorded interview, Bass assured the public that the City, the LAFD, and Mayor Bass were prepared for the wind event, stating, “When we saw the wind warning, with the outstanding leadership from our fire department, we immediately moved. We know this is a historic event, and so we moved aggressively to make sure that we deployed resources right away in the high-risk areas. So we didn’t want to wait. We were proactive about that.” Bass also acknowledged that, “I just again want to thank the leadership of Kristin Crowley and the Los Angeles Fire Department that are always on the ready.”

At a press conference on the morning of January 8, 2025, Crowley accurately reported that in addition to fighting the Palisades Fire, the Hurst Fire, and 32 structure fires within the City, the LAFD had also responded to 3,624 calls for 911 service - more than double the LAFD’s daily average - since the prior morning. At the press conference, Kevin McGallen, Director of the Los Angeles County Office of Emergency Management, applauded the National Weather Service for its communication and notifications to stakeholders in the days prior to the anticipated windstorm, which enabled the City and County to plan for the wind event.

By the time Mayor Bass arrived back in Los Angeles on January 8, 2025, her trip to Ghana and absence during the predicted extreme weather event had made national news. Bass was under heavy scrutiny for being absent during a critical time for the City. The scrutiny was made worse by Bass’ recorded response, or lack thereof, when questioned by a reporter after her flight landed, which went viral on the Internet.

Crowley focused on containing a devastating fire while continuing to serve the rest of the City—all without adequate resources.

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#### **E. The Press Questions Bass and Crowley About Bass' Budget Cuts to the LAFD**

At 5pm on January 8, 2025, Bass attended a press conference, during which she was questioned about Crowley's Report submitted in December 2024, stating that the LAFD budget reduction severely limited the LAFD's capacity to train and respond to large-scale emergencies like wildfires. When the reporter asked Bass whether she was concerned that Crowley's assessment and warnings had come to play with the Palisades Fire, Bass declared, "I am confident that it did not," and did not respond further.

At a press conference on January 9, 2025, regarding the Palisades Fire, reporters questioned Bass about her decision to cut the LAFD's operating budget by \$17 million. Bass dismissively declared that "there were no reductions that were made that would have impacted the situation that we are dealing with over the past couple of days." A reporter then asked Crowley whether the \$17 million budget cut impacted the LAFD's ability to respond to the fires. Under pressure from Bass, Crowley did not respond to that question.

Soon after the January 9, 2025, press conference, Crowley realized that Bass' attempts to mislead the public and to cover up the LAFD's dire financial situation were a disservice to Angelenos – especially given the City's increasing need to respond to extreme weather events like the one that led to the Palisades Fire. For years, Bass and the City had ignored and dismissed Crowley's advocacy and requests for appropriate funding for staffing, resources, and infrastructure so the LAFD could keep the City safe. The City was now experiencing the extremely negative impacts of years of insufficient funding, yet Bass' response to media inquiries on the important issue of the LAFD's lack of resources seemed to be the same: dismiss and ignore.

#### **F. Crowley Tells the Truth About Bass' Budget Cuts to the LAFD and Their Impact on Preparedness and Safety**

On approximately January 9, 2025, and January 10, 2025, Crowley attended several media interviews, answering questions about the LAFD's budget cuts.

On approximately January 10, 2025, at 12pm, Crowley attended a live one-on-one interview with Fox 11 about the Palisades Fire. During the interview, Crowley truthfully confirmed that the LAFD's budget was cut and confirmed that the budget cuts impacted the LAFD's ability to provide services, stating that "any budget cut is going to impact our ability to provide service." Crowley advised that "we are screaming to be properly funded to make sure that our firefighters can do their jobs so that we can serve the community." When asked to give a message to City Administrators starting with Mayor Bass, Crowley stated, "my message is the Fire Department needs to be properly funded" and that "we've got the justification - we know where our gaps in service are, we know we need 62 new fire stations, we need to double the size of our firefighters, the growth of this City since 1960 has doubled and we have less fire stations." When pressed to state whether Crowley felt that Bass and the City had failed

the LAFD, Crowley honestly answered in the affirmative, stating, “this is more than a job to us. This is who we are. This is our duty. And when you don’t have that ability, and people don’t listen, that’s why I’m talking to you right now. The Fire Department needs to be funded appropriately.”

### **G. Bass Retaliates Against Crowley**

Upon information and belief, shortly after Crowley’s interview with Fox 11, Bass decided to remove Crowley as Fire Chief and began efforts to recruit retired LAFD Chief Deputy Ronnie Villanueva to replace Crowley.

On January 10, 2025, at approximately 5pm, Mayor Bass’ office called Crowley into Bass’ office without advance notice. When Crowley arrived, Mayor Bass, Bass’ staff, and the United Firefighters of Los Angeles City (UFLAC) President Freddy Escobar were sitting in the room. Bass’ staff angrily and inaccurately declared that LAFD did not take a budget cut, despite that the \$17.6 million operational budget cut is public record and that Crowley had previously met with this same staff multiple times to discuss those budget cuts.<sup>3</sup> Bass then stated, “I don’t know why you had to do that; normally we are on the same page, and I don’t know why you had to say stuff to the media.” Escobar responded, “She told the truth.” Crowley asked Bass whether she was being fired, and Bass advised that “right now I can’t do that.”

The next day, January 11, 2025, retired Chief Deputy Villanueva began working at the Cit’s Emergency Operations Center, donning a Mayor’s office badge.

On February 3, 2025, two weeks before Chief Crowley was removed from her position, retired Chief Deputy Villanueva wrote a Report to the Board of Fire Commissioners identifying himself as Interim Fire Chief, apparently in anticipation of his expected appointment to replace Crowley.<sup>4</sup> [Exhibit 20]

On February 7, 2025, Bass held a press conference where she declared that the Board of Fire Commissioners “will do an independent investigation” that “will be headed by Tyler Izen, the Commission Independent Assessor” into the LAFD and how it handled the Palisades Fire. But the LA City Charter does not permit Izen, whose scope of work and authority is as an auditor, to investigate the LAFD.

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<sup>3</sup> During these prior meetings with Bass’ staff, Bass’ staff did not deny the objective fact that the LAFD had taken an operational budget cut or that critical civilian positions had been deleted.

<sup>4</sup> Villanueva apparently dated the Report February 3, 2025, although it was not entered into the public record until March 4, 2025. The Report recognized many of the same budgetary issues and resource deficits previously identified by Crowley. The Report also appeared to recommend reevaluation of the deployment model that was in effect and followed for years through the containment of the Palisades Fire, including during Villanueva’s tenure as Chief Deputy of Emergency Operations, when he approved the LAFD deployment decisions.



After the announcement, Crowley reported an honest concern to Bass' Acting Deputy Mayor of Public Safety and Deputy Chief of Staff, Celine Cordero, that Bass' attempts to have Izen "investigate" the LAFD violated the Los Angeles City Charter and potentially the Firefighters Bill of Rights. Crowley noted that the City Charter gives Izen authority to conduct an internal audit, but not an investigation. Crowley acknowledged that she would participate in an authorized audit and advised that she would also cooperate with an investigation by the Fire Research Safety Institute (FSRI) – an independent investigatory body that the Governor had commissioned to investigate the Palisades Fire and how it was handled.

On February 18, 2025, at 11:00am, Crowley and her staff met with Board of Fire Commissioners President Genethia Hudley-Hayes, Board of Fire Commissioners Vice President Sharon Delugach, Independent Assessor Tyler Izen, and Bass' Deputy Director of Fire, EMS & Public Health Elliot Layne. During the meeting, the group discussed the FSRI independent investigation and the potential of the LAFD conducting an after-action report of the Palisades Fire. The participants of the meeting discussed that the FSRI was well-equipped to evaluate how the Palisades Fire was handled. At no time during or after the meeting did anyone instruct Crowley to conduct an after-action report. Nor did Crowley ever refuse to conduct or participate in an after-action report.

At 5pm on February 18, 2025, Fox News broadcast a pre-recorded interview with Bass about the Palisades Fire. During the interview, Bass made patently false and knowingly dishonest statements, trying to shift the blame to Crowley for Bass' widely criticized personal decision to travel to Ghana during the highly anticipated weather event leading to the Palisades Fire. During the interview, Bass falsely denied that she had been aware of the severe weather warnings that were national news, with the goal of blaming Crowley for not personally calling to notify her about the predicted weather.<sup>5</sup> But the anticipated weather emergency had been national news starting on January 3, the day before Bass left for Ghana. Bass' administration also attended numerous meetings about the anticipated weather event.

Bass' written public statements leading to the Palisades Fire make clear that she was well aware of the severe weather event. On January 6 – the day before the Palisades Fire broke out - Bass personally posted a warning about the weather emergency on her X platform, retweeting the National Weather Service, which had been warning about the event for days. [Exhibit 17] On the morning of January 7, Bass also issued a press release stating that: "After the National Weather Service announced a destructive High Wind Watch and a Fire Weather Watch for parts of Los Angeles

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<sup>5</sup> Among many other national and international news outlets, NBC News reported on the interview, stating that, "Mayor Bass is now appearing to blame Fire Chief Kristin Crowley for not warning her that historically high winds have been predicted for the city early last month, saying in a television interview that if she had such a warning, she would have canceled her trip to Africa."

City on Monday, Los Angeles Mayor Karen Bass mobilized City departments to urgently prepare for the coming storm to ensure the safety of all Angelenos.” [Exhibit 18]

Nor did Crowley have the practice of personally calling the Mayor regarding every anticipated wind or weather emergency. Crowley had no understanding that doing so was expected of her. Crowley and her staff had been in regular communication through regular channels with Bass’ administration and the EMD to prepare for the weather event. Contrary to Bass’ false statements, Crowley’s actions did not depart from her normal practice or the normal practice of the LAFD.

During the February 18, 2025, Fox News broadcast, Bass also stated that the “level of preparation” she expected from the LAFD to prepare for the weather event on January 7 “really didn’t happen.” But these claims are contradicted by Bass’ contemporaneously recorded statements saying otherwise. On the morning of January 7, 2025, Bass issued a press release showcasing the LAFD’s pre-deployment and deployment decisions in preparation for the wind event. Then, two hours after the Palisades Fire broke out on January 7, Bass announced to the public in a recorded radio interview that, “[w]hen we saw the wind warning, with the outstanding leadership from our fire department, we immediately moved. We know this is a historic event, and so we moved aggressively to make sure that we deployed resources right away in the high risk areas. So we didn’t want to wait. We were proactive about that.... I just again want to thank the leadership of Kristin Crowley and the Los Angeles Fire Department that are always on the ready.”<sup>6</sup>

During the February 18, 2025, Fox News broadcast, while claiming that the “level of preparation” she expected from the LAFD “really didn’t happen,” Bass also admitted that she did not have the information needed to accurately assess (or have a basis for criticizing) in hindsight the City’s or the LAFD’s deployment or preparation decisions in January. Bass admitted that questions of whether “there could have been 10 more fire engines,” whether “there were firefighters that were sent home” or “why were they sent home” – “all of that has to be examined with experts; that’s why we’re going to have the investigations because it’s very important to get to the bottom of it.” Bass also declared that “is it time that somebody be fired.... I think it's premature to say now, but I do think that we have to examine everything.” When asked specifically about Crowley’s performance as Fire Chief, Bass again acknowledged that she lacked the information necessary to make that assessment, stating, “I think that’s something

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<sup>6</sup> Since Bass’ radio interview praising Crowley’s and the LAFD’s preparation for the wind event on January 7, Bass has not asked Crowley or the LAFD while Crowley was Fire Chief, a single question about the LAFD’s pre-deployment or preparation for the weather event.

that has to be assessed. I need to understand why things were handled differently this time than they've been handled before.”<sup>7</sup>

At no time between Bass' February 18, 2025, broadcasted interview (admitting that she lacked sufficient information to assess or evaluate Crowley's and the LAFD's deployment decisions) and February 21, 2025 (when Bass announced her removal of Crowley as Fire Chief), did Bass seek or receive the information from Crowley or the LAFD that she acknowledged she lacked and needed to accurately and fairly assess Crowley's and the LAFD's performance in January 2025.

At approximately 11am on February 21, 2025, Bass walked into Crowley's office and told Crowley that she was removing her from the Fire Chief position, effective immediately. Bass' lawyer then handed Crowley a letter advising Crowley that she was being removed from her position effective immediately [Exhibit 21]. The letter falsely stated that: “Unfortunately, you have exercised management incompatible with what is required of leaders of City departments. One example is the decision to send 1,000 firefighters home instead of keeping them on duty on the morning that the fires broke out.” At no time during, before, or after the meeting did Bass ask Crowley about her or the LAFD's deployment decisions, or whether the LAFD could have safely or effectively pre-deployed 1,000 additional firefighters on January 7 (it could not).

At approximately 11:45am on February 21, 2025, Bass' office organized an internationally covered press conference and distributed an official press release [Exhibit 22] announcing her removal of Crowley from the position of Fire Chief. Bass used the press conference, her official press release, and her platform as Mayor to create a false narrative about Crowley, a career public servant and firefighter who relentlessly fought to keep Angelenos and LAFD firefighters safe. The purpose of Bass' misinformation campaign was to redirect public and media scrutiny from Bass to Crowley (i.e., scapegoating Crowley), and to cover up the true reason for Crowley's removal – that Crowley dared to tell the truth to the public about the LAFD's operational budget cuts and their negative impacts on the LAFD's ability to provide public safety services, which Bass' administration had ignored. Bass' patently false accusations made at her press conference and in her press release about Crowley included:

- False Statement That Crowley Refused to Conduct an After-Action Report: Bass falsely stated that Crowley refused an instruction from Board of Fire Commissioners President Hudley-Hayes to conduct an after-action report about the Palisades Fire. But at no time did Crowley refuse an instruction to conduct an after-action report. Instead, at a meeting with Hudley-Hayes and many others, everyone appeared to agree that the LAFD's limited resources would be better focused on its daily lifesaving emergency services and that the FSRI was

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<sup>7</sup> In fact, things had *not* been handled differently than they had been handled before, which the Mayor knew or should have known based on past events, and Crowley would have accurately told Bass that fact had she simply asked.

better suited to conduct an after-action report since it is an independent investigative body already commissioned to conduct the report. At the meeting, Hudley-Hayes concluded that no after-action report would be conducted by the LAFD. Hudley-Hayes made that conclusion clear to all attendees of the meeting. Bass did not question Crowley or the other attendees of the meeting with Hudley-Hayes about the truth of her false accusation against Crowley.

- False Statement That Crowley Could Have Deployed an Additional 1,000 Firefighters on January 7: Bass falsely stated that “we all know that a thousand firefighters that could have been on duty on the morning the fires broke were instead sent home on Chief Crowley’s watch.”<sup>8</sup> Bass made a similar false statement in her official press release. The truth is that the LAFD did not have sufficient operating emergency vehicles to safely and effectively pre-deploy 1,000 (or anywhere near 1,000) additional firefighters on January 7. Crowley had previously requested an increased budget for personnel to repair and maintain emergency fire engines, fire trucks, and ambulances, which request was denied by Bass. Additionally, the truth is that on January 7, the LAFD staffed *all* its operational frontline emergency vehicles, and *all* the LAFD’s operational frontline emergency vehicles serviced the City on January 7. Bass never asked the LAFD, during Crowley’s tenure as Fire Chief, or Crowley, about Bass’ patently false accusation that a thousand firefighters could have been on duty but were sent home. Indeed, just three days prior, Bass admitted to Fox News that she did not know whether this accusation was true, or if it was, whether it was justified. Instead, she stated that the pre-deployment decisions would need to be “examined.” Having conducted no such examination and receiving no further reliable information, Bass nevertheless chose to endorse the false accusation in front of a national and international audience, smearing Crowley.
- False Statement that Crowley always personally called Bass about Weather Issues: In an effort to again blame Crowley for Bass’ personal decision to travel to Ghana during the nationally anticipated severe weather event, Bass faulted Crowley for not personally calling Bass to notify her that there was an impending weather emergency. Bass falsely stated that “every time there was a weather emergency or even a hint of a weather emergency, the Chief has called me directly.” This was not true; Crowley did not have a practice of personally calling Bass to notify her every time there was a weather emergency or “a hint of a weather emergency.” Instead, Crowley historically and in January 2025

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<sup>8</sup> Bass has been well-aware misinformation was circulating regarding the Palisades Fire. Mayor Bass acknowledged this at a press conference on January 8, 2025, saying that “it’s easy to get caught up in information that is not accurate...we want people to have accurate information and I think most of us know that the Internet is not always the best place to get accurate information.” During the same press conference, Bass also declared that “this is a time for vigilance and action, not speculation.”

followed procedure, relying on the EMD to notify the appropriate channels of the administration, including Bass, about weather emergencies.

- False Statement about the LAFD Budget: Bass falsely stated that “the fire department budget was not cut” and that instead, the LAFD budget “was increased,” falsely implying that Crowley’s (truthful and accurate) reporting and appeals to the public about the LAFD’s documented operational budget cuts were untrue.

During her press conference on February 21, 2025, Bass also announced that retired Chief Deputy Ronnie Villanueva would replace Crowley as Interim Fire Chief.

Upon her removal as Fire Chief, Crowley had the choice of retiring or continuing to serve the citizens of Los Angeles in the LAFD. Inconveniently for Bass, Crowley did not then retire, instead choosing to continue serving the LAFD and the people of Los Angeles. In response, Bass’ administration placed Crowley on mandatory administrative leave, detailing (assigning) her to stay home and away from her firefighter colleagues and the Angelenos she has ably served for decades.

On approximately February 25, 2025, in apparent response to misinformation that Mayor Bass and her office attempted to spread to the media and the public about the operational budget cuts at LAFD, Los Angeles City Controller Kenneth Mejia prepared a presentation summarizing Crowley’s repeated efforts to ring the alarms on inadequate funding for the LAFD, Bass’ \$17.6 million cut to the LAFD’s operational budget and the deletion of LAFD critical civilian positions for Fiscal Year 2024-2025. [See Exhibit 23]

At a public hearing on March 4, 2025, Crowley disclosed to the City Council, in the presence of Bass’ staff, that Bass’ statements about her reasons for removing Crowley were flagrantly false. Crowley explained the facts that Bass never bothered to ask her or the LAFD – including that the LAFD did not have the apparatus necessary to safely pre-deploy an additional 1,000 firefighters on January 7, and that Crowley did not refuse to conduct an after-action report. After the hearing, which Bass chose not to attend, Bass’ staff endorsed the falsehoods that Bass had previously said about Crowley, again falsely telling the media that Crowley refused to conduct an after-action report.

On multiple occasions since the March 4, 2025 hearing, and continuing through today, despite knowing that the statements are false, Bass continues to restate the same falsehoods about Crowley, including via national media outlets. Bass’ continued smear campaign against Crowley is a callous and malicious effort to punish Crowley (who continues to serve at the LAFD) for speaking the truth to the public about the LAFD’s dire financial situation and operational budget cuts, to distract the public from Bass’ own missteps, and to warn all City employees that Bass will use her power as Mayor to destroy their reputations and careers if they choose public safety and transparency over the personal interests of Bass.

In April 2025, the City declined to place Crowley in a vacant position as Deputy Chief, despite Crowley's qualifications and her expressed interest in serving in such a position. Crowley has therefore been demoted by three ranks and now serves as an Assistant Chief. Since March 2025, the City has shuffled Crowley's position numerous times,<sup>9</sup> with the apparent purpose of isolating her, removing her ability to connect with the LAFD members and the Los Angeles community, and minimizing her ability to contribute to the LAFD. The retaliation continues to this day.

On July 17, 2025 – over four months after Bass removed Crowley as Fire Chief – Bass continued her smear campaign against Crowley via a Vice News interview. During the interview, Bass made numerous false statements about Crowley, including but not limited to:

- Bass falsely claimed that Crowley could have, but did not, pre-deploy an additional 1,000 firefighters to the Pacific Palisades. When asked why the LAFD did not pre-deploy the 1,000 firefighters that Bass claims could have been deployed, Bass said, "I don't know why they didn't...it is a mystery to me." Yet, at no time did Bass ask Crowley whether it was true that 1,000 additional firefighters could have been pre-deployed or, if they could, why they were not. Nor during Crowley's tenure as Fire Chief did Bass ask dozens of other Command Staff at the LAFD about the pre-deployment decisions they made and approved for January 7, 2025. If she had asked, she would have been told the truth – that LAFD could not safely deploy an additional 1,000 firefighters because it did not have the apparatus to do so.
- Bass falsely declared that on January 7, 2025, "there were 40 fire engines that were idle because they didn't have the staff that she sent home" and blamed Crowley for this false retelling of history. Contrary to Bass' false narrative, *none* of the 40 fire engines referred to sat "idle" on January 7, 2025. Instead, on January 7, 2025, *all* 40 fire engines were staffed and were either pre-deployed to strategic areas that were wildfire-prone, dispatched to the multiple wildland fires that broke out or were ready for and did respond to 911 emergency calls in the City, pursuant to the preparation and deployment plans that were approved by multiple subject matter experts at LAFD. There is no basis for Bass' false statement about the 40 fire engines.
- Bass falsely claimed that Crowley told "lies...about the budgets" and referred to "the budget cut that never happened" despite that Bass had indeed cut the LAFD's operational budget in Fiscal Year 2024-2025 by \$17.6 million, which is well documented, cannot be reasonably disputed, and against which Crowley fought repeatedly, including in writing.

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<sup>9</sup> After being removed from the Fire Chief's Office, Crowley was first detailed home, then placed in a field assignment as an Assistant Chief at the Operations Valley Bureau, and then reassigned as an Assistant Chief to a Special Duty position at the Risk, Health and Safety Division, away from the LAFD headquarters.

- Bass falsely stated that Crowley “was refusing to participate in the after-action [report.]” Bass further stated, “when you refuse to do your job, you typically don’t have your job after that. So that’s what happened.” Again, this was a patently false statement, and at no time did Crowley refuse to participate in an after-action report or refuse to do her job.

Through her actions from January 2025 through present, Bass has chosen her personal interest over transparency and the truth, over the interests of the people of Los Angeles, and over the interests of the thousands of firefighters who risk their lives daily to protect the people of Los Angeles, including Crowley, a career firefighter serving the LAFD for over 25 years.

The decision of Bass and the City of Los Angeles to defame Crowley and remove her as Fire Chief was, in whole or in substantial part, retaliation for Crowley’s protected speech and activities. Crowley’s engagement in protected activity and/or speech was a substantial motivating reason and/or factor in the decision of the City of Los Angeles and Bass to remove her from her position as Fire Chief, to reject her request for a position as Deputy Chief, to attempt to put her in an isolated position that lacks influence or power, and to make false and disparaging statements about her. Crowley alleges, among other claims, Defamation, Retaliation in Violation of Labor Code sections 98.6, 232.5, 1050, 1101, 1102, 1102.5, Retaliation in violation of the California and United States Constitutions, and negligence under California common law.

Crowley also alleges that Karen Bass and the City of Los Angeles and its employees, staff, agents, and administrators allowed, permitted, incited, excused, and otherwise ratified the aforesaid misconduct.

Through this filing, Crowley notifies the interested parties of her legal claims and demands that Bass immediately cease and desist her defamatory and illegal public smear campaign of Crowley, retract her false statements about Crowley, and apologize for lying about Crowley - a dedicated public servant who has, for decades, risked her life to keep Angelinos safe, and as Fire Chief, fought to keep the LAFD firefighters safe.