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17 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
18 REED, and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,

27 Plaintiffs,
28

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF STEPHEN W.
YOUNG IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Judge: Hon. S. James Otero
Date: February 21, 2017
Time: 10:00 a.m.
Crtrm.: 10C

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v.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF KEPLEY, in his representative capacity; and DOES 1-10,

Defendants.

I, Stephen W. Young, declare as follows:

1. I resided in the Torrance Beach area of Torrance, California, about 12 miles from Lunada Bay, from 1972 to 1975. I have personal knowledge of the matters stated in this declaration and, if called as a witness, could and would testify competently as to its contents.

2. I was born in San Diego and grew up in Santa Barbara. I served in the U.S. Air Force after high school. I attended college while serving in the military. I then attended Cleveland Chiropractic College in Los Angeles from 1972 to 1975, during which I lived in Torrance Beach.

3. After 1975, I lived in Santa Barbara, the Santa Ynez Valley, San Pedro, and Santa Maria, all in California. Since 2009, I have resided in Santa Maria. Currently, I am a semi-retired chiropractic doctor.

4. I have been a surfer ever since I was 14 or 15 years old, and I am now 69 years old. I enjoy being in the water, and I like the challenge of

1 catching and riding big waves.

2 5. During 1972 to 1975, when I lived in Torrance Beach, I tried to
3 surf at Lunada Bay to catch the big waves there. I tried going to Lunada Bay
4 to surf about 20 to 30 times during the time I lived in Torrance Beach.

5 6. I was harassed and bullied every time I went to Lunada Bay, and
6 there were times when I feared for my life. For example, I remember a few
7 occasions when, after parking my car on the bluff to go surfing, the locals
8 would physically block me from the trail. On these occasions they
9 threatened to throw me off the cliff so I left.

10 7. Generally, I was harassed the entire time that I was at Lunada
11 Bay. If I made it down to the water, the locals would say things such as,
12 “You’re not fucking welcome. Get your ass out of the water before we jump
13 on you” and tell me that Lunada Bay was a private beach. In the water, the
14 locals would violate common rules of surfing etiquette to ruin my surfing
15 session.

16 8. On at least one occasion, I tried to take a wave when I had the
17 right of way, and one of the men who was harassing me intentionally
18 dropped in front of me and disrupted my ability to take the wave. Then he
19 yelled at me for taking his wave.

20 9. I would get harassed on the beach, too. The men at Lunada Bay
21 acted mean and tough, and they seemed coordinated. They would puff their
22 chests at me and get close to my face, and they pushed me a couple of
23 times. I would then leave, especially when there was more than one of
24 them. I was afraid if I stayed that I would get jumped and beaten.

25 10. I also tried to sit on a bench that appeared to be constructed by
26 the other surfers, as it did not appear to be a city bench. However, the other
27 surfers told me to leave, saying things such as, “This is our area. Get your
28 ass out of here. Get your ass off our beach.”

1 11. I always drove to Lunada Bay to go surfing, and my van was
2 vandalized several times when I parked it there. On different occasions
3 when I was in the water, someone “keyed” the paint, ripped off a side-view
4 mirror, broke a taillight, and punctured my tires.

5 12. I tried to complain about the harassment I received at Lunada
6 Bay to the local Palos Verdes Estates police. Sometimes a police officer
7 would be present at Lunada Bay, and I would tell him about the harassment.
8 The police officer would ask, “Which one harassed you?” but it was clear the
9 police officer was not interested in hearing the answer because all the likely
10 people were too far away to identify. For example, officers would ask this
11 when we were on the bluff and the harassers were down on the beach or in
12 the water. The police did not walk down the bluff with me, nor offer any
13 other way for me to identify for them the persons who had harassed me.
14 After getting no meaningful response from the police and police indifference,
15 my efforts to complain to the police seemed useless and I stopped telling the
16 police about the harassment.

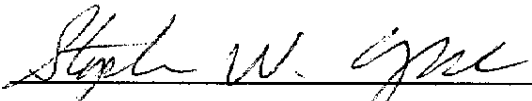
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1 13. I want the aggressive Bay Boys that engage in unlawful activity
 2 to be barred from using this beach for sufficient time to change attitudes and
 3 for this beach to be returned to the public. I want the City of Palos Verdes
 4 Estates to enforce its ordinances fairly, for it to provide signage so people
 5 will know Lunada Bay is a public beach, for it to provide signage marking the
 6 safest trails to the shoreline, and for the police to take complaints by visiting
 7 beachgoers seriously and be available to help in case non-local beachgoers
 8 are assaulted or otherwise unlawfully excluded from Lunada Bay. Although I
 9 am now 69 years old, I love the California coast and I enjoy expressing
 10 myself through surfing and visiting the beach. I want to return to Lunada
 11 Bay; I want to be able to visit Palos Verdes Estates beaches without being
 12 intimidated and to be safe. And if I am harassed, I want the City of Palos
 13 Verdes Estates police to take my complaints seriously, to take steps to
 14 identify any people that harass me, and to give citations or arrest people
 15 who have broken the law instead of simply telling me to "get along" with the
 16 locals.

17
 18 I declare under penalty of perjury under the laws of the United States
 19 of America that the foregoing is true and correct.

20 Executed in Santa Maria, California on December 22,
 21 2016.

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 23 
 24 STEPHEN W. YOUNG

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