

## Public comment from E. Mohammad

**From:** Tamim Mohammad <tamimmohammad@gmail.com>

**Sent:** Monday, May 18, 2026 8:18 AM

**To:** Procurements <procurements@bhsoac.ca.gov>; Amy Vang <amy.vang@bhsoac.ca.gov>

**Cc:** BHSOAC <bhsoac@bhsoac.ca.gov>; Brenda Grealish <brenda.grealish@bhsoac.ca.gov>; Sandra Gallardo <Sandra.Gallardo@bhsoac.ca.gov>; Amariani Martinez <Amariani.Martinez@bhsoac.ca.gov>; Danielle Fischer <Danielle.Fischer@bhsoac.ca.gov>; Ruvalcaba, Lorena@calcivilrights <lorena.ruvalcaba@calcivilrights.ca.gov>

**Subject:** Re: PRA 2026-09 — Clarification and Record Preservation re IPF Development, Search Scope, and BCCP® / B2C3A™ Chronology Re: PRA 2026-09 — Clarification and Record Preservation re IPF / BCCP® / B2C3A™ Re: PRA 2026-09 — Follow-Up Timing Notice Re: PRA 20...

Dear Ms. Vang, Ms. Gallardo, and Commission Staff,

Thank you for the Commission's May 4, 2026 response regarding PRA 2026-09.

Given the length of the attached materials, I respectfully request that the Commission prioritize review of this cover correspondence and Exhibit Q-T6 — particularly the thirteen clarification questions in Section VI. Exhibits Q-T6A and Q-T6B are offered as supporting reference and evidentiary context for the Commission's consideration of its search scope, oversight obligations, and no-responsive-records position.

I write to preserve the administrative record and to request limited clarification regarding the scope and implications of the Commission's "no responsive records" position as it relates to IPF development, contractor-facilitated process, and the chronology of prior BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) / B2C3A™ Pipeline Prevention Model notice.

This follow-up seeks to clarify the distinction between:

- a procedural position that no responsive records were located within the search performed; and
- any broader substantive implication that no relevant awareness, review, discussion, or connection existed during IPF development.

I also note for the record that correspondence in this thread has been routed through individual staff members rather than the institutional channels to which the original April

24, 2026 inquiry was addressed, including the procurement office and general Commission inbox. I am restoring those channels in this communication to ensure institutional continuity of receipt. I respectfully request confirmation that these submissions are being processed through the Commission's standard public-comment and administrative-record channels — and not routed exclusively through individual staff correspondence — consistent with the Commission's stated commitment to transparency, public input, and equitable handling of submitted materials as reflected in Chair Alvarez's April 24, 2025 statements that the Commission intended to "meaningfully collect information from the public" and build "trust with our public."

For context, the attached exhibits document a sequence of prior notice, consultation, public-record submission, omission acknowledgment, contractor-facilitated process, and non-response relevant to the Commission's PRA 2026-09 search-scope position. The following is offered as an executive overview for any reviewer.

The BCCP® / B2C3A™ framework was developed by a licensed clinical psychologist through more than a decade of legislative evaluation across Massachusetts and California, County clinical practice, safety-intelligence analysis, documented public-safety advocacy, and lived experience as a family caregiver, advocate, and CARE Court petitioner navigating the same publicly funded behavioral health systems the IPF was designed to reform — including following a child fatality and an employee fatality within the County service environment in early 2024.

During ADA-protected medical leave periods in 2024, Commission Chair Mayra Alvarez met directly with the framework's author regarding materially related public-safety, access, prevention, workforce, and systems-governance concerns — including asking specifically what LACDMH Director Wong had done in response to the concerns raised, a question for which the documented record reflects no responsive action until April 16, 2025, six days after BCCP® entered the public record. The commitments made at those consultations were never followed through. The framework's author was subsequently displaced for the third time on July 19, 2024 — approximately seven weeks after those commitments were made. Contemporaneous notes of the April 3 and May 31, 2024 consultations — prepared pursuant to APA Ethics Code 6.01 professional documentation obligations — are preserved separately and may be made available through appropriate civil rights channels upon request.

BCCP® / B2C3A™ entered the Los Angeles County public record on April 10, 2025 and the state Commission record on April 24, 2025. At the April 24, 2025 BHSOAC hearing, the framework's author made three public comments introducing BCCP® / B2C3A™ into the state Commission record, including a final comment naming five County divisions where

framework constructs had been applied without attribution. Written attribution notice was transmitted that same day to Commissioner Gary Tsai — SAPC Director, LA County DPH, and BHSOAC Program Advisory Committee Chair — CC'd to LACDMH Director Wong and LACDMH leadership. No substantive response was received. Dr. Tsai's concurrent role as PAC Chair means that a named County official with documented same-day attribution notice of BCCP® / B2C3A™ held a governance role in the IPF development process that followed. That intersection has not been addressed in the Commission's administrative record or its PRA 2026-09 response.

On July 16, 2025, LA County DPH Office of Violence Prevention transmitted written acknowledgment of BCCP® / B2C3A™ — distributed to County governance, oversight, Board of Supervisors district offices, CEO offices, DMH RTW, CEOP, and state-level oversight recipients including MHSOAC — describing the framework as highlighting critical intersections between budget priorities and ethical prevention strategies and affirming the framework author's leadership in systems reform. That distribution reached the same administrative channels — including CEOP and DMH RTW — that had been managing the framework author's employment and accommodation status while the framework's author remained on involuntary unpaid ADA medical leave without accommodation resolution, and that are named in active investigations under LA County OCI Case #2025-23219 and CEOP Case No. BCCP-CEOP-ADA-2025-0806, both of which have been pending without substantive investigative findings or written status detail since August 2025. Five days later, on July 21, 2025, written attribution notice referencing BCCP® / B2C3A™ by name and copyright registration TXu 2-486-534 was transmitted to Dr. Tsai and DPH Director Dr. Barbara Ferrer — with no substantive response received from either.

The Commission subsequently engaged Sellers Dorsey, a private equity-affiliated contractor, to facilitate IPF concept development and draft a framework for publicly funded behavioral health reform — using language materially overlapping with BCCP® / B2C3A™ problem domains — after the framework had already entered both the County and state public record. From May 23, 2025 through March 17, 2026, fifteen written communications were transmitted to Sellers Dorsey requesting acknowledgment, records contact identification, and attribution clarification. No written acknowledgment or substantive response was received — including in response to a formal final request explicitly invoking the framework author's ADA Title II and Section 504 written-only communication accommodation as confirmed by the California Civil Rights Department.

The Commission's own administrative record reflects a documented pattern of differential handling of submitted materials during this period. BCCP® / B2C3A™ written submissions from April 23–24, 2025 — predating by approximately three weeks a written equity

principles letter from the California Pan-Ethnic Health Network — and follow-up submissions on April 30 and May 19, 2025 were omitted from the official May 22, 2025 meeting materials in which the CPEHN letter was included, retroactively archived in a separate Written Public Comment link, and acknowledged and apologized for as omitted by Commission staff on June 6, 2025 — fifteen days after the May 22 BHSOAC hearing at which CPEHN's letter and Sellers Dorsey's contractor-facilitated IPF session materials remained in the official record. CPEHN subsequently confirmed in writing on May 27, 2025 that it was not aware of the BCCP® / B2C3A™ frameworks. At the same April 24 session, Cal Voices Deputy Director Zoeller identified both CPEHN and CBHDA — the California Behavioral Health Directors Association, whose membership includes LACDMH Director Wong — as having raised issues regarding peer workforce integration. Neither organization has provided a substantive response to attribution and provenance inquiries. On January 22, 2026 — the same date the IPF RFA outline was approved — the Commission executed a contract amendment with CPEHN to include work with BHSA priority populations.

The April 24, 2025 session is also the subject of a record-integrity concern regarding the availability of the complete audio record. I also respectfully request written confirmation whether the Commission maintains an unedited audio or video archive of the April 24, 2025 session — particularly the third public comment at timestamp 03:00:44, which is inaudible in the available public recording — and whether that archive is subject to preservation and public records access.

At the May 22, 2025 BHSOAC session, Chair Alvarez publicly identified navigation barriers in terms materially aligned with BCCP® / B2C3A™ problem domains previously raised with her during the April and May 2024 consultations:

*"Frankly, we're not even going to be able to do that on our own. So, I'm holding this like what are we contributing to?... Something that comes up time and time again is navigation. What happens when my child has a crisis and do I know how to get the services — navigating these behemoth of systems is a challenge."* — Chair Mayra Alvarez, BHSOAC, May 22, 2025

*"What can we do in collaboration with our partners, our agencies, and private industry, philanthropy to move the needle."* — Chair Mayra Alvarez, BHSOAC, May 22, 2025

At the same session, Sellers Dorsey executive Marco Mijic framed access inequity in navigation terms:

*"Is there a single door or are there 20 doors that you have to go through? Someone can have a paved path to that door and someone has to go climbing mountains to get to that door."* — Marco Mijic, Sellers Dorsey, BHSOAC May 22, 2025

These statements are preserved because they closely track the navigation, access, family-crisis, and systems-burden concerns raised before BCCP® / B2C3A™ entered the record and before the contractor-facilitated IPF framework discussion proceeded.

That timing is significant — approximately thirteen months after Chair Alvarez had received direct consultation from the framework's author regarding the same navigation failures, children in crisis, prolonged waitlists, and access barriers — concerns she characterized as warranting a recommendation to the Board of Supervisors and potentially state legislation — and had committed to escalating those concerns to Commission legal counsel, the BHSOAC Executive Director, the National Health Law Program, and exploring County-level audit and Medi-Cal accountability processes, including questioning why counties do not systematically track deaths across contracted service providers. No documented follow-through on those commitments occurred before the framework's public-record entry.

At the April 24, 2025 BHSOAC session, the framework's author introduced BCCP® / B2C3A™ into the state Commission record with the following on-record statement:

*"The BureauCare-to-Custody-Cemetery Pipeline is a prevention framework — diagnostic in its clarity and prescriptive in its solutions."* — Dr. Esroruleh T. Mohammad, Ph.D., Licensed Clinical Psychologist, Author BCCP® / B2C3A™, April 24, 2025, timestamp 00:27:12 Excerpt from first public comment; full comment and written pre-hearing materials in Exhibit Q-T6A.

The Commission's own members made the following on-record statements at the same session:

*"Do we have anybody that has any knowledge... like, wins, like, from these committees... and the work that they did for the 14 plus years."* — Commissioner Chambers, BHSOAC, April 24, 2025, timestamp 02:16:19

*"Many members of the public have been part of this commission for years longer than any of us and have reflections on what happened before, what could be more effective moving forward. So let's put that on the table."* — Chair Mayra Alvarez, BHSOAC, April 24, 2025, timestamp 02:15:37

*"The secret sauce of peer respite programs is lost... because of the fact that they have to adhere to bureaucratic and administrative processes."* — Commissioner Fernandez, BHSOAC, April 24, 2025, timestamp 02:52:07

*"Whether they fit in the system change bucket or they're nice ideas — to give them their good and just hearing."* — Commissioner Will Lightbourne, BHSOAC, April 24, 2025, timestamp 04:04:08

*"The summaries done in this document don't do justice at all to what people had sent in... between now and that May meeting staff will be working on all of the concepts that were submitted to sort of present substance that does justice to the organizations that took the time to send their ideas in."* — Commissioner Will Lightbourne, BHSOAC, April 24, 2025, timestamp 03:54:09

These commitments were made at the same session at which BCCP® / B2C3A™ submissions were subsequently omitted from official meeting materials — with the omission acknowledged by Commission staff on June 6, 2025 — while other submissions received during the same period remained in the official record.

The framework's author had done exactly that — putting more than a decade of prior clinical practice, systems analysis, and public-safety advocacy on the table at that same session, including a framework specifically designed to address the bureaucratic and administrative processes Commissioner Fernandez identified as destroying the secret sauce of community care. At the same session, Commissioner Tsai — SAPC Director, LA County DPH, and BHSOAC Program Advisory Committee Chair — asked:

*"I'm very familiar with this tension between how we can benefit from some of the standards and the financial benefits of Medi-Cal and balancing that with trying to create a simple way for us to actually benefit from Medi-Cal. Can you talk a little bit more about in the TA that you provide to try to make these complex processes simpler, what are some of the key pain points so that we can better understand how best to navigate that tension?"* — Commissioner Gary Tsai, SAPC Director / BHSOAC PAC Chair, April 24, 2025, timestamp 01:36:13

This question was posed more than twenty years after the Mental Health Services Act was enacted — by a senior County public health official with concurrent governance authority over the IPF development process — at the same session where a framework developed to address those same implementation barriers had already been introduced into the Commission record.

The institutional response to that question closed with:

*"So that's that's about the extent of my knowledge."* — Cal Voices Director Clare Cortright, April 24, 2025, timestamp 01:39:14

The framework's author had offered exactly that knowledge — on the record, at the same session, with an explicit invitation to collaborate. The Commission's own stated standards for inclusive public engagement — and its own acknowledgment of the omission — have not been reconciled with the subsequent "no responsive records" position regarding IPF development.

The Commission's "no responsive records" response to PRA 2026-09 does not clarify whether relevant awareness, discussion, review, or connection existed during IPF development. BHSOAC Chief Counsel acknowledged BCCP® as proprietary in writing on July 21, 2025. The Commission confirmed on May 12, 2026 that prior 2025 framework-specific correspondence was reviewed. Commissioner Tsai received written attribution notice on the same day he made on-record statements overlapping with the framework's diagnostic premise and held a governance role in IPF development. Chair Alvarez — approximately one year after direct personal consultations with the framework's author regarding materially related institutional conditions — publicly described the existing workforce-integration system as haphazard, lacking a real strategy, and moving in a patchwork way at the same session where BCCP® / B2C3A™ was introduced. The documentary record — including written submissions, public transcripts, omission acknowledgments, and the non-response chronology — makes it difficult to reconcile the "no responsive records" position with the broader documented sequence.

The attached exhibits are submitted solely to preserve this chronology, to clarify the search-scope distinction, and to ensure that the Commission's administrative record accurately reflects the prior notice, consultation, and framework-development sequence before IPF implementation proceeds and before related civil rights proceedings — CRD Case No. 202503-28458711 — reach their evidentiary stage.

Attached please find:

- Exhibit Q-T6 — Clarification and Record Preservation Memorandum re PRA 2026-09, IPF Development, and BCCP® / B2C3A™ Chronology
- Exhibit Q-T6A — Selected April 24 and May 22, 2025 Transcript Excerpts Filename: Exhibit\_Q-T6A\_April24\_May22\_2025\_Transcript\_Excerpts\_Tsai\_LACDMH\_DPH\_CalVoices\_CP\_EHN\_Alvarez\_BCCP\_B2C3A\_May2026.pdf
- Exhibit Q-T6B — Comparative Chronology of Private-Equity Contractor-Facilitated IPF Language and Related Clarification Context  
Filename: Exhibit\_Q-

T6B\_Comparative\_Chronology\_PrivateEquity\_Contractor\_IPF\_Language\_Sellers\_Dorsey\_BCCP\_B2C3A\_May2026.pdf

In light of the documented discrepancy between the Commission's no-responsive-records position and the evidence preserved in these exhibits, I respectfully request that the Commission follow up directly with Sellers Dorsey, LACDMH leadership, and any Commission advisory committee members with concurrent County employment roles — including those identified in the conflict-of-interest context preserved in Exhibit Q-T6 — to ensure the search scope adequately accounts for the broader institutional awareness sequence documented above.

These materials are submitted solely to preserve chronology, prior notice, search-scope concerns, contractor-facilitated process context, and related record-integrity questions. They are not submitted to seek immediate adjudication of ownership, attribution, or matters outside the scope of this clarification request. Questions 7 through 13 in Exhibit Q-T6 are submitted not to request immediate adjudication of ownership, attribution, or institutional-continuity issues, but to preserve documented sequences, provenance questions, and administrative-record gaps in the Commission's record before IPF implementation proceeds and before related civil-rights proceedings reach their evidentiary stage.

The thirteen clarification questions in Exhibit Q-T6, together with the transcript and chronology evidence preserved in Exhibits Q-T6A and Q-T6B, are submitted to support administrative ethics, record integrity, oversight accountability, and civil-rights record completion. Complete written responses are material because the underlying ADA/IPM record remains incomplete where LACDMH has not documented, recorded, or produced the disclosures made during those proceedings, while materially related access, workforce, prevention, public-safety, and systems-governance issues are now reflected in BHSOAC's own public transcripts, meeting materials, and administrative correspondence. For that reason, clarification of the Commission's position regarding receipt, awareness, search scope, omission history, IPF development, and contractor-facilitated process is necessary for both the BHSOAC/DHCS/IPF administrative record and the pending California Civil Rights Department (CRD) investigative record.

Related County, licensing, and Medi-Cal program-integrity matters are referenced in Exhibit Q-T6 only to preserve record continuity where the BHSOAC administrative record intersects with publicly funded behavioral-health governance, ADA/IPM disclosures, and civil-rights review.

I respectfully request that this correspondence and all attached materials be preserved with the PRA 2026-09 record and, to the extent appropriate under Commission procedure, associated with the May 28, 2026 meeting record for purposes of continuity and transparency. I respectfully request confirmation whether this submission and attached exhibits will be included in the May 28, 2026 BHSOAC meeting materials for Commission review — or whether they will be handled separately — consistent with the Commission's stated commitment to transparency and inclusive public engagement, and in light of the documented omission of prior submissions from official meeting materials in April, May, and June 2025.

This request also encompasses any records reflecting or arising from direct consultations between Commission Chair Mayra Alvarez and the framework's author on or about April 3 and May 31, 2024, including calendar entries, notes, follow-up communications, referrals to Commission legal counsel or external contacts, and any documentation of commitments or action items arising from those consultations.

This submission was prepared by the framework's author while on involuntary unpaid ADA medical leave, without union representation, and without legal counsel — across multiple simultaneous active proceedings including CRD Case No. 202503-28458711. It is based on publicly available transcripts, documented correspondence, and the author's best efforts at accurate record preservation consistent with evidence-based professional and ethical standards. Any typographical or formatting errors should be understood in that context and not construed as substantive inaccuracies.

Please provide all responses in writing to this email address only, consistent with my ADA / Section 504 written-only communication accommodation.

Respectfully,

Dr. Esroruleh T. Mohammad, Ph.D.

Licensed Clinical Psychologist

Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model

Systems Equity & Family Advocate | CARE Court Petitioner (2024–2025)

U.S. Copyright TXu 2-486-534, effective April 15, 2025

U.S. Trademark Registration No. 8,107,651, SN 99168607, registered January 20, 2026; first use April 10, 2025

ADA / Section 504 Written-Only Communication Accommodation

[tamimmohammad@gmail.com](mailto:tamimmohammad@gmail.com)

CRD Case No. 202503-28458711

ADA / Section 504 Notice: This correspondence is submitted pursuant to a medically supported written-only communication accommodation. Please provide all responses in writing to preserve accessibility, accuracy, and administrative-record continuity.

## **EXHIBIT Q-T6 — Clarification and Record Preservation Memorandum re PRA 2026-09, IPF Development, and BCCP® / B2C3A™ Pipeline Prevention Model Chronology**

**Document Context:** This exhibit concerns BCCP® / B2C3A™ record continuity in relation to ADA/IPM proceedings, IPF development, and the broader MHSA-era public behavioral-health governance context beginning with Proposition 63 / MHSA implementation in the mid-2000s.

### **Purpose of Submission**

This memorandum is submitted to preserve the administrative record and to request limited clarification regarding the scope and implications of the Commission’s PRA 2026-09 response as it relates to IPF development, contractor-facilitated process, and the chronology of prior BCCP® / B2C3A™ notice.

This memorandum does not request reconsideration of the PRA response as such. Rather, it seeks clarification regarding the distinction between:

- a procedural position that no responsive records were located within the search performed; and
- any broader substantive implication that no relevant awareness, review, discussion, or connection existed during IPF development.

This clarification is material because the documented chronology includes prior consultation, ADA/IPM-related disclosures, public-record submissions, omission acknowledgments, contractor-facilitated discussion, and later framework-development activity in materially overlapping prevention, access, navigation, workforce-equity, lived-experience, and systems-governance domains.

### **I. Core Chronology Relevant to IPF Awareness and Search Scope**

**Summary of Chronology:** The following chronology documents the sequence of notice, consultation, submission, omission, and institutional non-response relevant to the Commission’s PRA 2026-09 position. It establishes that Commission-level awareness of BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) / B2C3A™ problem domains preceded the framework’s public-record entry through multiple channels; that attribution notices were transmitted to named County and Commission officials across a documented sequence; and that the Commission’s non-responsive-records position must be evaluated against this broader record.

**Contextual Background:** On April 19, 2022 — the date of the framework author’s first ADA/IPM proceeding — departing LACDMH Director Dr. Jonathan Sherin stated:

*“I know firsthand that it isn’t easy to work within a system that is often focused more on taking care of various bureaucratic processes than on the communities we are here to serve.”*

— Dr. Jonathan Sherin, M.D., Ph.D., departing LACDMH Director, April 19, 2022

That statement underscores the long-standing institutional relevance of the access, prevention, and systems-governance concerns that the BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) and its prescriptive B2C3A™ Pipeline Prevention Model were subsequently developed to diagnose and address.

Those concerns remained unresolved across County and state-level oversight contexts for approximately three years before BCCP® / B2C3A™ entered the public record on April 10, 2025. That public-record entry occurred exactly one year after the framework author’s first direct consultation with BHSOAC Chair Mayra Alvarez regarding materially related institutional conditions, and after the matter had already been submitted to the California Civil Rights Department through a complaint filed in March 2025. CRD later accepted formal jurisdiction under CRD Case No. 202503-28458711 on December 17, 2025.

**Additional May 2022 Context:** In a Department-wide message following the mass shootings in Uvalde, Buffalo, and Laguna Woods, departing LACDMH Director Dr. Jonathan Sherin described the events as shaking “our collective humanity and morality to the core,” acknowledged feelings of hopelessness and helplessness in society, and described LACDMH as a “beacon of hope inside and outside the county.” This statement is relevant to the Department’s acknowledged role in responding to collective trauma, public violence, hopelessness, helplessness, connectedness, and community care during the same transition period in which Dr. Lisa Wong was appointed Acting Director. It is also relevant to the later BCCP® / B2C3A™ focus on postvention, access, prevention infrastructure, and displacement from care into crisis.

The chronology is also relevant because MHSA-era behavioral-health governance continued across multiple documented public-safety and postvention concerns involving children, families, workforce safety, and barriers to care, including concerns raised by the framework author within Prevention and Early Intervention contexts between 2019 and 2022 before displacement into the first ADA medical leave, and later raised with Commission leadership before BCCP® / B2C3A™ entered the public record during the third medical leave period. The Prevention and Early Intervention obstruction and related access, data, and systems-governance concerns were also discussed with BHSOAC Chair Alvarez during the April and May 2024 consultations. This continuity is further corroborated by MHSA Program Manager IV Kalene Gilbert’s April 14, 2025 written acknowledgment that the framework author had “expanded since [his] early work with the Prevention and Early Intervention team,” reflecting direct institutional awareness of both the author’s PEI background and subsequent independent framework development.

The Commission’s subsequent IPF emphasis on workforce equity, community investment, lived experience, and systems-level advocacy therefore developed in materially overlapping problem domains after the framework author had already provided direct consultation, ADA/IPM-related disclosures, public-record submissions, and attribution notices concerning BCCP® / B2C3A™.

The following chronology preserves the sequence of Commission-level notice, consultation, submission, omission, attribution, and IPF-related developments relevant to PRA 2026-09:

- May 31, 2022 — ADA-protected meeting with Dr. Keyondra Bunch-Wilcox concerning workforce-equity, ethics, and professional-participation issues in public behavioral health

settings. Dr. Bunch-Wilcox served concurrently as a County-employed psychologist, BHSOAC Commissioner, and SEIU Local 721 liaison. This consultation is relevant because it establishes that Commission-level notice of the institutional conditions the BCCP® / B2C3A™ framework was developed to address reached a County-employed Commissioner through an ADA-protected meeting more than two years before the framework entered the public record — and that the same individual held simultaneous roles across the County employment, state oversight, and labor-representation channels most directly implicated in the framework's development, displacement, and attribution chronology. Through later consultations in April and May 2024, that notice also reached the Commission Chair directly — establishing two distinct institutional channels through which Commission-level awareness preceded the April 2025 public-record entry.

- October 12, 2023 — Written correspondence transmitted to LACDMH Director Dr. Lisa Wong following the Asian American Mental Health Conference, after an in-person consultation at which Director Wong and Chief of Staff Patty Choi were present and access-to-care barriers were discussed. The correspondence addressed network adequacy, access to culturally competent care, provider training requirements, Cultural Humility and Implicit Bias training, and barriers to service utilization for racially and ethnically diverse families and communities. The communication also followed months of interdepartmental collaboration and formal consultation involving Workforce Education and Training (WET) and ARDI / Cultural Competency channels, and occurred during the same period in which the framework author had been referred a high-profile Board of Supervisors family-navigation crisis matter. This entry establishes direct written contact with Director Wong on access, equity, workforce-training, and family-navigation themes approximately eighteen months before the BCCP® public-record entry.
- April 3, 2024 — consultation with Chair Alvarez during active ADA medical leave regarding postvention, workforce, equity, and related governance concerns following a sentinel child-fatality event at a contracted legal-entity provider — occurring during the second involuntary ADA medical displacement and before the third displacement began July 19, 2024. During this consultation, Chair Alvarez characterized the mortality-tracking and access concerns presented as actionable at the Board of Supervisors level and potentially warranting state legislation — including questioning why counties do not systematically track the number of deaths across contracted service providers. Chair Alvarez also directly inquired regarding Director Wong's response to the concerns presented. No documented follow-through on the state legislation characterization, the Wong inquiry, or the commitments made at the May 31, 2024 follow-up consultation occurred before the third displacement began July 19, 2024. Contemporaneous notes of both consultations are preserved pursuant to APA Ethics Code 6.01 professional documentation obligations and are available through appropriate civil rights channels upon request.
- May 31, 2024 — follow-up consultation with Chair Alvarez after return to work and after the April 29, 2024 El Centro site visit. At this meeting — following a series of consultations in which Chair Alvarez met with and received substantive clinical and systems-level input from the framework's author during, between, and immediately before ADA medical leave periods — Chair Alvarez committed to contacting Kim Lewis at the National Health Law Program, consulting the BHSOAC Executive Director, and consulting Commission legal counsel regarding the institutional conditions the BCCP® /

B2C3A™ framework's author had documented — including workplace safety concerns and postvention needs following a child fatality and an employee fatality. No documented follow-through on any of those commitments occurred before the third involuntary ADA medical displacement of the framework's author — a licensed psychologist and CARE Court petitioner — began July 19, 2024, approximately seven weeks later. Approximately eleven months after those commitments were made and without documented follow-through, the Commission engaged Sellers Dorsey in a contractor-facilitated IPF (Innovation Partnership Fund) framework-design process in materially overlapping problem domains. Chief Counsel Sandra Gallardo subsequently became the Commission's primary point of contact for all BCCP® / B2C3A™ attribution correspondence beginning June 2025 — identifying BCCP® / B2C3A™ as proprietary but characterizing the attribution evidence as insufficient in a July 2025 final response — without documented disclosure of any prior involvement through the consultation commitments made by Chair Alvarez. This sequence is preserved for governance, conflict-of-interest, and administrative-record continuity purposes.

- January 20–21, 2025 — formal non-authorization and attribution notices transmitted through SEIU 721 and stated during the ADA-protected Interactive Process Meeting.
- March 11, 2025 — Civil Rights Department (CRD) complaint filed.
- March 28, 2025 — written notice to Director Wong that the matter might also serve as a reference point in evaluating process improvements and equity efforts related to CARE Court services — thirteen days before BCCP® entered the public record.
- April 10, 2025 — BCCP® / B2C3A™ entered the County public record.
- April 16, 2025 — six days after BCCP® entered the public record — LACDMH Director Wong publicly stated that the Department needed to "advocate at the state level for technical assistance" as programs shifted from prevention to early intervention. See PPSGC, April 16, 2025, approx. 1:03:21–1:13:31, public video archive. Wong's April 30, 2025 Board letter stated that it responded to Commission correspondence concerning the April 10 public hearing — creating a documented sequence from the April 10 public-record entry to later formal departmental response.
- April 23–24, 2025 — BCCP® / B2C3A™ materials submitted to BHSOAC in writing before the April 24 meeting — including a QR-linked summary handout and a request for circulation and inclusion in the meeting record.
- April 24, 2025 — BCCP® / B2C3A™ entered the state-level Commission record through three public comments and related written submissions. Full transcript excerpts preserved in Exhibit Q-T6A. On the same day, written attribution notice was transmitted directly to Commissioner Gary Tsai — SAPC Director, LA County DPH, and BHSOAC Program Advisory Committee Chair — CC'd to LACDMH Director Wong and LACDMH leadership. No substantive response was received.
- April 24, 2025 — Ruqayya Ahmad, representing the California Pan-Ethnic Health Network (CPEHN), made a public comment at the April 24, 2025 BHSOAC hearing at timestamp 03:22:06 — twenty-two minutes after the framework author's third public comment at timestamp 03:00:44 naming five County divisions and stating “replication under new branding” on the record. CPEHN's subsequent May 15, 2025 written submission using overlapping language was included in official May 22, 2025 meeting materials. On May 27, 2025, Ms. Ahmad confirmed in writing that CPEHN was not aware of the BCCP® / B2C3A™ frameworks. At the same April 24 session, Cal Voices

Deputy Director Zoeller identified CPEHN and CBHDA — the California Behavioral Health Directors Association, whose membership includes LACDMH Director Wong — as having raised issues in connection with AB96 peer workforce integration. Neither CPEHN nor CBHDA has provided a substantive response to attribution and provenance inquiries. A written records and clarification request to CPEHN dated October 27, 2025 seeking internal communications referencing BCCP® has not received written acknowledgment or response as of the date of this submission.

- May 8, 2025 — Multiple material events occurred on the same date. LACDMH transmitted a Director Order to the framework author while he was on approved ADA medical leave, restricting County-related communications from personal email, written communications to DMH leadership, attendance at County and DMH-sponsored events, references to DMH affiliation from personal email, and communications outside the DMH Return-to-Work Unit. This entry is included not to request employment adjudication by BHSOAC, but to preserve chronology: the order was issued on the same date the framework author made a public attribution request at the Behavioral Health Commission hearing, and three days after presenting BCCP® / B2C3A™ at County and state behavioral-health hearings on May 5, 2025. At the same May 8 BHC hearing, MHSA Program Manager IV Kalene Gilbert used the B2C3A™ technical term “prescriptive” twice in response to Commissioner questions about bureaucratic centralization. The clinical evaluation deadline for the CARE Court respondent for whom the framework author served as petitioner also fell on that date. The Los Angeles County Board of Supervisors’ CEOP office also opened a new compliance case on May 8, 2025 documenting ADA-related concerns arising from the same pattern of conduct reflected in this chronology.
- May 15, 2025 — California Pan-Ethnic Health Network submitted a written equity principles letter included in official May 22 meeting materials using language materially overlapping with BCCP® / B2C3A™ problem domains. BCCP® / B2C3A™ written submissions from April 23–24 — predating the CPEHN letter by three weeks — were omitted from those same materials and retroactively housed in a separate Written Public Comment link following the June 6 omission acknowledgment.
- May 22, 2025 — contractor-facilitated IPF discussion occurred including public discussion of framework development, navigation barriers, and systems burden. Full transcript excerpts preserved in Exhibit Q-T6A.
- June 6, 2025 — Commission staff wrote apologizing for the omission of BCCP® / B2C3A™ submissions from the May 22, 2025 meeting materials, attributing the omission to staff transition, and confirming the submissions would be added to the Written Public Comment section of the Commission website.
- June 19, 2025 — BHSOAC Chief Counsel requested specificity regarding BCCP® / B2C3A™ attribution evidence, with a response deadline.
- July 16, 2025 — Ms. Charlotte Robinson-Perkins, LA County DPH Office of Violence Prevention, transmitted written acknowledgment of BCCP® / B2C3A™ — distributed to County governance, oversight, Board of Supervisors district offices, CEO Family and Social Services, CEO ARDI, DMH RTW, CEOP, public safety channels, and state-level oversight recipients including MHSOAC — describing the framework as highlighting "critical intersections between budget priorities and ethical prevention strategies" and

affirming the framework author's "leadership in systems reform and lived-expertise advocacy."

- July 21, 2025 — BHSOAC Chief Counsel issued a final response identifying BCCP® / B2C3A™ as proprietary but stating that no sufficiently detailed evidence had been received despite intervening submissions — five days after DPH/OVP had transmitted written acknowledgment of BCCP® / B2C3A™ distributed to state and County oversight recipients.
- July 21, 2025 — Dr. Tamara Hunter, executive leader, LA County Department of Children and Family Services (DCFS), was referenced in written correspondence to DPH Director Ferrer and SAPC Director Tsai as having emphasized at a recent cross-departmental convening that a demonstration project would serve as "a test of change" with "fresh strategies to address the gaps in our safety net for former foster youth" — language overlapping with B2C3A™ transition risk mitigation, interdepartmental coordination, and prevention-centered systems redesign constructs. DCFS is one of the five County divisions named in the framework author's third public comment at the April 24, 2025 BHSOAC hearing as having applied framework constructs without attribution.
- July 21, 2025 — second written attribution notice transmitted to Dr. Tsai and DPH Director Dr. Barbara Ferrer — CC'd to numerous County, state, and oversight recipients — referencing BCCP® / B2C3A™ by name, copyright registration TXu 2-486-534, and authorship, and identifying specific County programs where framework constructs had been applied without attribution or consultation. No substantive response was received.
- September 17, 2025 — LA County DPH Director Dr. Barbara Ferrer stated at the PPSGC meeting: *"A lot of funding tends to be more reactive as opposed to primary intervention... we're trying to construct a different framework."* This statement was made five months after BCCP® / B2C3A™ had entered the public record and been transmitted directly to Dr. Ferrer with written attribution notice — approximately three years after departing LACDMH Director Dr. Jonathan Sherin named the same institutional conditions on April 19, 2022, and more than twenty years after the Mental Health Services Act was enacted. It is included for chronology and public-language context only.
- October 16, 2025 — third written clarification request transmitted directly to Dr. Tsai — CC'd to DPH-SAPC Monitoring, DPH Planning, the Mental Health Commission, the Board Executive Office, County Counsel, the Inspector General, DPH Director Ferrer, DPH-OVP, and the U.S. Department of Justice Disability Rights Section — specifically requesting clarification whether SAPC's Specialty SUD System Transformation framework, presented to the Behavioral Health Commission on October 9, 2025, draws upon, references, or aligns with BCCP® / B2C3A™, and requesting confirmation of how SAPC plans to integrate ADA-protected and lived-experience frameworks into future system-transformation initiatives to ensure authorship fidelity and statutory compliance under Sections 1557 and 504. No substantive response was received.
- November 26, 2025 — BHSOAC Commissioners approved the IPF framework at the November 26, 2025 meeting — occurring after written attribution notices had been transmitted to named County and Commission officials across the documented sequence above and while the CRD civil rights investigation was active.
- December 17, 2025 — California Civil Rights Department accepted jurisdiction over CRD Case No. 202503-28458711, encompassing accepted allegations including discrimination based on associational disability, ADA accommodation failures, and

employment-related civil rights violations spanning the period March 1, 2024 to present — establishing an active parallel civil rights investigation relevant to the same institutional actors and pattern of conduct identified in this chronology.

- January 20, 2026 — U.S. Trademark Registration No. 8,107,651 for BCCP® (Serial No. 99168607) was registered — establishing federal trademark protection for the framework after it had already entered the County public record on April 10, 2025, the state Commission record on April 24, 2025, and while the CRD civil rights investigation was active. The trademark registration predates the IPF RFA release and the IPF Round 1 application deadline of May 8, 2026.
- January 22–23, 2026 — BHSOAC approved the IPF RFA outline at the January 22–23, 2026 Commission meeting — occurring after the federal trademark registration of BCCP® on January 20, 2026 and while CRD Case No. 202503-28458711 remained active and pending.
- January 22, 2026 — At the same Commission meeting at which the IPF RFA outline was approved, the Commission executed a contract amendment with CPEHN — the California Pan-Ethnic Health Network — to include work with BHSA priority populations. This occurred after CPEHN had confirmed in writing on May 27, 2025 that it was not aware of BCCP® / B2C3A™, and two days after the federal trademark registration of BCCP® on January 20, 2026. Commissioner Tsai voted yes on the IPF RFA outline approval. Commissioner Bunch abstained. Chair Alvarez was absent.
- April 3, 2026 — Commission staff acknowledged that a March 27, 2026 submission had been delayed or overlooked.
- May 4, 2026 — PRA 2026-09 response stated that no responsive records were located connecting BCCP® / B2C3A™ to IPF development.
- May 8, 2026 — IPF Round 1 RFA application deadline — falling on the exact same calendar date as the May 8, 2025 Director Order, BHC public attribution request, CARE Court clinical evaluation deadline, and CEOP compliance case opening, and two years to the date after the County prohibited the framework's author from discussing child suicide prevention and postvention during clinical site visits with contracted providers and from seeking supervisory guidance on those topics — with the matter referred to HR and accommodation channels rather than addressed through clinical oversight. The IPF application process proceeded after documented BCCP® / B2C3A™ notice, attribution requests, record-omission concerns, unresolved ADA/IPM record-continuity issues, and the April 3 and May 31, 2024 consultations with BHSOAC Chair Alvarez regarding those same postvention and access concerns.

This chronology is preserved not to relitigate prior disputes, but to clarify whether the Commission's search and response adequately accounted for the broader sequence of notice, submission, omission, contractor-facilitated process, and later framework-related activity through which awareness could have been present.

**Record-Continuity Note:** The County-level pattern of conduct reflected in this chronology — including the roles of Commissioner Gary Tsai and Commissioner Dr. Keyondra Bunch-Wilcox in the IPF development process and the institutional non-response to attribution notices, given their concurrent County employment and BHSOAC Commissioner roles — is also documented in LA County OCI Case No. 2025-23219 and CEOP Case No. BCCP-CEOP-ADA-2025-0806,

both of which name relevant County officials and both of which have been pending without substantive investigative findings or written status detail since August 2025, notwithstanding OCI's April 2026 confirmation that Case No. 2025-23219 remained under active review. The completeness of both investigative records depends in part on the BHSOAC administrative record context preserved in these submissions. Chair Alvarez indicated during the April 3 and May 31, 2024 consultations that County-level audit processes warranted investigation and that accountability mechanisms should be explored. No documented follow-through occurred, and the Commission's subsequent activity in materially overlapping problem domains proceeded through contractor-facilitated IPF development rather than the accountability and oversight pathways discussed.

## II. April 24, 2025 Hearing Context

On April 24, 2025, BCCP® / B2C3A™ was not only submitted in writing but also expressly introduced into the Commission record through three public comments as a framework addressing structural fragmentation, administrative burden, access, equity, safety, transparency, and fidelity to purpose. The full transcript excerpts are preserved in Exhibit Q-T6A. The analytical significance of the April 24 record is addressed here.

In addition to the public comments, the April 24 hearing chronology included direct pre-hearing transmission of materials to Chair Alvarez and the Commission. On April 23, 2025, I transmitted written correspondence describing the framework as a systems-equity and trauma-responsive reform model. On the morning of April 24, before the start of the hearing, I transmitted follow-up materials including a QR-linked summary handout, the full framework handout, and a request for circulation and inclusion in the meeting record.

These transmissions occurred approximately eleven months after the framework's author had consulted directly with Chair Alvarez on April 3 and May 31, 2024 regarding the same institutional conditions the framework addresses — including child waitlists, mortality tracking across contracted service providers, and related access and governance concerns — during which Chair Alvarez made specific commitments to consult Commission legal counsel, the BHSOAC Executive Director, and the National Health Law Program, and characterized the concerns as potentially warranting state legislation. Those commitments were not documented in the Commission's administrative record and no follow-through occurred before the framework's public-record entry.

The April 24 hearing is relevant on four distinct grounds:

**First — the Commission's own stated interest in prior knowledge.** Chair Alvarez stated at timestamp 02:15:19 that the Commission wanted to meaningfully collect information from the public without wasting people's time — and at timestamp 02:15:37 that members of the public with years of prior Commission experience should put that experience on the table. Commissioner Chambers asked at timestamp 02:16:19 whether anyone had knowledge of prior committee wins. These statements — made approximately two hours after my first public comment at timestamp 00:25:38 — establish that the Commission was actively soliciting the

kind of prior framework knowledge BCCP® / B2C3A™ represented at the same session where that knowledge had already been introduced.

**Second — direct introduction of BCCP®/B2C3A™ into the record.** I made three public comments at timestamps 00:25:38, 01:56:38, and 03:00:44. The third — the final public comment of the session — explicitly named five County divisions where BCCP® constructs had been implemented without attribution and stated on the record: *"When frameworks designed to protect public health are absorbed without equity, the result is not reform — it's replication under new branding."* That comment is inaudible in the available video recording. The transcript text is preserved in Exhibit Q-T6A and derived from the independently extracted session transcript.

The inaudibility of the most attribution-specific statement made at the April 24, 2025 hearing is itself a record-integrity concern. I respectfully request written confirmation whether the Commission maintains an unedited audio or video archive of the April 24, 2025 session that may capture that comment more clearly, and whether that archive is subject to preservation and public records access.

**Third — same-hearing substantive overlap.** Commissioner Fernandez confirmed at timestamp 02:52:07 that bureaucratic and administrative processes were eroding the core value of peer respite programs. Commissioner Lightbourne documented administrative burden on the behavioral health workforce, CDEP erosion, and the prison-to-community pipeline at timestamps 03:58:27 through 04:04:08. BHSOAC staff committed at timestamp 03:54:09 to presenting substance that "does justice to the organizations that took the time to send their ideas in." Commissioner Lightbourne committed at timestamp 04:04:08 to giving every submitted concept "a good and just hearing" before the May meeting. Full excerpts preserved in Exhibit Q-T6A.

**Fourth — the CPEHN asymmetry.** CPEHN's representative spoke at timestamp 03:22:00 — twenty-two minutes after the framework author's third public comment. Cal Voices Deputy Director Zoeller had identified CPEHN at the same April 24 hearing as having raised issues in connection with peer workforce integration — establishing CPEHN's awareness of the April 24 session context before submitting overlapping language on May 15. CPEHN's May 15 letter using overlapping language was included in official May 22 meeting materials. On May 27, 2025, CPEHN confirmed in writing that it was not aware of BCCP® / B2C3A™ and indicated openness to meeting to explore alignment — while the framework author's submissions remained omitted from official meeting materials. BCCP® / B2C3A™ submissions from April 23–24 were omitted from those same materials — retroactively housed in a separate Written Public Comment link after the June 6 omission acknowledgment. The Commission's record-handling process treated these submissions differently — a documented administrative asymmetry that the Commission has not addressed.

In that context, the later omission of directly relevant BCCP® / B2C3A™ materials from subsequent May 22 meeting materials, together with later broad no-awareness implications, presents a chronology, record-integrity, and governance question. The Commission's own April 24 record establishes prior notice, substantive overlap, direct attribution requests on the public record, a stated commitment to give every submitted concept a good and just hearing, and a

documented record-handling asymmetry — before the contractor-facilitated May 22 session and before the later no-records/no-awareness position was asserted.

### **III. May 22, 2025 IPF Discussion and Contractor-Facilitated Process**

The May 22, 2025 record is relevant because the Commission publicly described the IPF process as one involving structural change, public-input integration, contractor-facilitated discussion, and draft framework development. The full transcript excerpts are preserved in Exhibit Q-T6A.

Four statements from the May 22 record are analytically significant here:

Chair Alvarez stated that the Commission *"really must change the way we've been doing things"* because it had not delivered results for communities. She identified navigation — *"navigating these behemoth of systems"* — as a recurring challenge. She confirmed that a contractor was engaged based on public and Commission feedback to *"develop a draft framework for the fund."* The Sellers Dorsey facilitator described access barriers through the *"single door or 20 doors"* formulation.

These statements are significant not as proof of derivation but because they establish that the Commission had moved into a contractor-facilitated process for developing a draft framework in response to public input — after BCCP®/B2C3A™ had already entered the record through the same public input process — and that the substantive problem domains discussed were materially overlapping with those introduced through BCCP®/B2C3A™ at the April 24 hearing.

These statements are also significant because materially overlapping concerns — including navigation failures, children in crisis, and access barriers — had been raised directly with Chair Alvarez during ADA-protected medical leave consultations on April 3 and May 31, 2024, with no documented follow-through before the framework's public-record entry. Those consultations specifically addressed child access-to-care waitlists of six or more months, mortality tracking across contracted service providers, and the absence of a coherent County strategy for structural reform — concerns Chair Alvarez characterized as potentially warranting state legislation and escalation to Commission legal counsel and the BHSOAC Executive Director.

The relevant question is not limited to whether a later records search located an explicit attribution document, but whether the Commission's search and substantive position adequately accounted for the broader sequence of public submissions, concept development, contractor-facilitated discussion, and framework drafting through which awareness could have been present.

### **IV. Contractor-Facilitated Materials and Search-Scope Clarification**

A chronology question is also presented by the apparent shift in Sellers Dorsey's May 22, 2025 presentation language compared with its earlier public-facing branding reviewed across January through April 2025. I do not present that comparison as proof of adoption or misconduct; however, concepts associated with structural reform, lived experience, workforce equity, cultural relevance, trauma-responsive transformation, implementation fidelity, and cross-sector systems change appear more visibly in the May 22 materials after BCCP®/B2C3A™ had entered the

County and state public record. A comparative chronology of public-facing contractor language across ten archived web captures spanning January 2025 through January 2026 is preserved separately in Exhibit Q-T6B.

This raises a narrow administrative question as to whether the Commission maintained any oversight, integrity, or fidelity safeguards where contractor-supported work operated in materially overlapping problem domains previously introduced through lived-experience-informed, ADA-period, or CARE Court-related public submissions.

The record-handling question is also significant in the context of the Commission's accessibility mandate. BCCP®/B2C3A™ was developed by an ADA-displaced licensed psychologist and CARE Court petitioner navigating disability-related barriers to participation in the same proceedings the Commission oversees. When a public safety framework submitted through ADA-accommodated written channels is omitted from official meeting materials while other equity-adjacent submissions are included in those same materials, the omission is not a neutral administrative error. It is a documented accessibility and equity question within a Commission whose core mandate includes ensuring that disabled contributors and CARE Court petitioners have meaningful access to the governance processes that affect them.

## **V. Distinction Between "No Records Located" and Broader "No Awareness" Implications**

For administrative clarity, I respectfully request clarification whether the Commission's PRA 2026-09 response means only that no formal responsive records were located within the search locations used, or whether the Commission is also taking the broader substantive position that no Commissioner, staff member, advisory-committee participant, or contractor had awareness of the BCCP®/B2C3A™ submissions, provenance concerns, or related 2024–2025 prevention/governance notice chronology during IPF development.

Those are materially different administrative positions. The issue presented here is not limited to whether any single actor had broad informal awareness of BCCP®/B2C3A™, but whether relevant awareness, receipt, discussion, and handling of those submissions were captured, acknowledged, and reflected within the Commission's formal records and related governance processes.

## **VI. Narrow Clarification Requested**

For administrative clarity, I respectfully request written clarification of the following:

1. Whether the Commission's search included records held by or exchanged with Sellers Dorsey in connection with IPF development, including communications, meeting materials, advisory-committee materials, contractor briefing materials, shared folders, draft frameworks, or facilitation notes.
2. Whether the search included materials involving Commission staff, advisory committee participants, or Los Angeles County participants involved in IPF development, including advisory committee materials, facilitation notes, contractor briefing materials, or draft framework materials.

3. Whether the Commission is taking only the procedural position that no responsive records were located, or also the broader substantive position that no relevant awareness, review, discussion, or connection existed during IPF development.
4. Whether omitted or later-corrected April–May 2025 submissions were accounted for in the Commission's awareness analysis.
5. What approval, contracting, or public-accountability process authorized the contractor-facilitated role described during the May 22, 2025 meeting, and how did the Commission understand that structure to advance oversight, accountability, and timely response within the IPF process?
6. Whether this correspondence and any attached materials will be preserved with the PRA 2026-09 record and, to the extent appropriate under Commission procedure, associated with the May 28, 2026 meeting record for purposes of continuity and transparency.
7. How does the Commission categorize, evaluate, and retain written submissions grounded in lived-experience, public-safety, and clinical-risk concerns — particularly where such submissions identify known risk factors for adverse outcomes including suicide and postvention failures, reflect mandated reporting obligations of licensed clinicians and clinical leaders, disclose publicly funded County risk data and safety intelligence, or document prevention and postvention conditions in collaboration with County-contracted legal entity providers — and whether such materials are distinguished from ordinary public comment for purposes of record-keeping, routing, and formal decision-making.
8. Whether the Commission's record-handling process for the May 22, 2025 meeting distinguished between written submissions included in official meeting materials and submissions later housed in a separate Written Public Comment link; whether BCCP® / B2C3A™ submissions were treated differently from other equity-adjacent written submissions received during the same period; and whether the Commission's administrative record reflects how those handling decisions were reconciled with April 24, 2025 Commission statements that the process was intended to “meaningfully collect information from the public,” build “trust with our public,” and provide submitted concepts a “good and just hearing.” This includes the sequence in which California Pan-Ethnic Health Network's May 15, 2025 written submission appeared in the official May 22, 2025 meeting materials, while BCCP® / B2C3A™ submissions from April 23–24 and May 19, 2025 were omitted from those materials and later archived separately, with the omission acknowledged by Commission staff on June 6, 2025.
9. Whether the Commission maintains any written criteria, procedure, or decision pathway for determining when a lived-experience, clinically informed, public-safety, or professionally developed framework submitted through public comment is considered relevant to Commission awareness, IPF development, public-safety prioritization, prevention planning, evidence review, or administrative-record preservation; and, if so, whether those criteria were applied to the BCCP® / B2C3A™ submissions or any similar equity-adjacent submissions received during the April–May 2025 IPF development period.
10. Whether the Commission's administrative record reflects any attribution, recognition, or documentation of substantive clinical and systems-level consultation provided to Commission leadership — including Commission Chair Mayra Alvarez — during direct personal consultations on April 3 and May 31, 2024, while the framework's author was on ADA-protected medical leave — including consultation regarding child waitlists,

mortality tracking, navigation failures, and access barriers, and including Chair Alvarez's direct inquiry regarding Director Wong's response to those concerns — and whether that record accounts for the documented sequence in which LACDMH Director Wong publicly stated at the April 16, 2025 PPSGC meeting, approximately one year after those consultations:

*"I think it would be really useful for us to get together as a department and advocate at the state level for technical assistance... those providers will have to become Medi-Cal certified... that's a huge leap for a lot of our community-based organizations."* —

LACDMH Director Lisa Wong, Psy.D., PPSGC, April 16, 2025, approximately 1:09:00, public video archive.

This question is submitted to clarify whether the Commission's administrative record reflects the prior consultation, notice, and chronology before later public discussion of materially overlapping prevention, early-intervention, technical-assistance, and systems-reform domains

11. Whether the Commission's administrative record reflects the institutional continuity between departing DMH Director Dr. Jonathan Sherin's April 19, 2022 statement — *'I know firsthand that it isn't easy to work within a system that is often focused more on taking care of various bureaucratic processes than on the communities we are here to serve.'* — DMH Director Dr. Jonathan Sherin, MD, April 19, 2022 — issued on the same date as the framework author's first ADA/IPM proceeding — and the prevention, access, administrative-burden, and systems-governance concerns that BCCP® / B2C3A™ were subsequently developed to diagnose and address.

This clarification is material because those same concerns were later brought directly to Commission leadership through personal consultation, public-record submission, and ADA-protected disclosure.

The institutional conditions Dr. Sherin identified in 2022 also remained active at the CEO/BOS level as late as April 15, 2025 — five days after BCCP® / B2C3A™ entered the public record — when County leadership publicly discussed structural bureaucratic complications, reactive care pathways contributing to jail deaths, institutional start-stop inertia, and unresolved Sherin-era mental-health capacity work.

This question is submitted to preserve the chronology connecting the April 19, 2022 institutional-process concerns, subsequent ADA/IPM proceedings, April 2025 CEO/BOS-level continuity, and later public-record submissions concerning prevention, access, administrative burden, and systems-governance concerns.

12. Whether the Commission's administrative record reflects the continuity between the framework author's first ADA/IPM proceeding on April 19, 2022 — the same date as Director Sherin's departure — and the U.S. Copyright registration TXu 2-486-534 effective April 15, 2025 and U.S. Trademark Registration No. 8,107,651 registered January 20, 2026, which together establish the formal intellectual property record of BCCP® / B2C3A™ as a framework developed through and documented across ADA-protected proceedings beginning April 19, 2022 and continuing through the non-authorization and attribution notices transmitted through SEIU and stated during the January 21, 2025 ADA/IPM proceeding — and whether the Commission's administrative record reflects that continuity of development, notice, and protected disclosure in its handling of BCCP® / B2C3A™ submissions.

13. Whether the Commission maintains any written records, notes, memoranda, calendar entries, follow-up communications, or other documentation reflecting or arising from direct personal consultations between Commission Chair Mayra Alvarez and the framework's author that occurred on or about April 3, 2024 and May 31, 2024 — including any documentation of commitments made, referrals initiated, or follow-up actions taken in connection with those consultations — specifically including any documentation reflecting Chair Alvarez's characterization of mortality-tracking failures across contracted service providers as warranting investigation, any documentation reflecting her characterization of the concerns as potentially warranting a recommendation to the Board of Supervisors or state legislation, and any documentation of commitments to consult Commission legal counsel, the BHSOAC Executive Director, or the National Health Law Program — and whether any such records are preserved in the Commission's administrative record, the Chair's official files, or any other Commission record system accessible under the California Public Records Act — including any records reflecting reforms, legislation, collaborations with LACDMH or the Board of Supervisors, or investments initiated based on the analyses and consultations that occurred during those meetings while the framework's author was on ADA-protected medical leave.

This question is also relevant in light of Chair Alvarez's May 22, 2025 public statement — *“What happens when my child has a crisis and do I know how to get the services — navigating these behemoth of systems is a challenge”* — made approximately thirteen months after consultations in which the framework's author had documented child access-to-care waitlists of six or more months, a high-profile Board of Supervisors family navigation referral, and postvention failures following a child fatality — and at a session where the framework addressing those same conditions had already been introduced into the Commission record and its submissions omitted from official meeting materials.

This question is submitted as both a clarification request and a California Public Records Act request pursuant to Government Code § 7920.000 et seq., with a response requested within ten calendar days of receipt.

### **Record-Continuity Note — Related Proceedings**

The administrative record preserved in this memorandum is directly relevant to CRD Case No. 202503-28458711 — accepted December 17, 2025, with seven allegations including ADA accommodation failure, disability discrimination, and retaliation — and to the underlying ADA/IPM record which remains incomplete where LACDMH has not documented or produced disclosures made during those proceedings.

The County-level pattern of conduct reflected in this chronology is also documented in LA County OCI Case No. 2025-23219 and CEOP Case No. BCCP-CEOP-ADA-2025-0806. Those matters are referenced here only to preserve record continuity where the BHSOAC administrative record intersects with County employment, ADA/IPM disclosures, public-safety advocacy, and civil-rights review.

The institutional pattern documented above is also reflected in Board of Psychology Case Nos. 6002023000092, 6002025000531, and 6002025000614, concerning licensed supervisory conduct

and clinical ethics arising from the same employment context. Those matters were closed without substantive jurisdictional review and are currently subject to pending written clarification requests to the Board's Assistant Chief Counsel.

A related DHCS Fraud Complaint, Reference No. 251216731, was filed concerning Medi-Cal program integrity and remains pending without written acknowledgment. It is referenced here only to preserve continuity where the Commission's IPF, DHCS-linked behavioral-health governance, Medi-Cal access, and publicly funded reform domains intersect with the record preserved in this submission.

The completeness and accuracy of the BHSOAC administrative record — including written responses to the clarification questions preserved in this memorandum — is material to the integrity of each of the related proceedings identified above.

### **Concluding Statement**

Questions 7 through 13 are submitted not to request immediate adjudication of ownership, attribution, or institutional-continuity issues, but to preserve documented sequences, provenance questions, and administrative-record gaps in the Commission's record before IPF implementation proceeds and before related civil-rights proceedings reach their evidentiary stage.

I am not requesting reconsideration of the PRA response through this memorandum. I am requesting clarification of the distinction between "no responsive records located" and broader implications regarding awareness, review, or handling, because those are materially different administrative positions.

The Commission's "no responsive records" position must be evaluated against a documented sequence drawn from the Commission's own records, correspondence, meeting materials, and public video archive:

- The Commission's own commissioners publicly asked whether anyone had knowledge of prior committee work spanning fourteen-plus years — at the same session where BCCP® / B2C3A™ was introduced.
- The Commission's own Chief Counsel acknowledged BCCP® / B2C3A™ as proprietary in writing on July 21, 2025.
- The Commission's own staff apologized for omitting the framework's submissions from official meeting materials on June 6, 2025.
- The Commission's own May 12, 2026 response confirmed that prior 2025 framework-specific correspondence was reviewed.
- The Commission's own public video archive documents three timestamped public comments introducing BCCP® / B2C3A™ into the state record — including a final comment naming five County divisions and stating "replication under new branding" on the record.
- CPEHN confirmed in writing on May 27, 2025 that it was not aware of BCCP® / B2C3A™ despite its representative speaking at the same hearing twenty-two minutes after that final comment — and despite CPEHN and CBHDA having been identified by

Cal Voices Deputy Director Zoeller at the same April 24 session as having expressed opposition to peer workforce integration — and while indicating openness to meeting with the framework's author to explore alignment.

- LACDMH confirmed no responsive records despite its own departing Director publicly naming materially related bureaucracy-over-community-care concerns on April 19, 2022 — the date of the framework author's first ADA/IPM proceeding.
- Commission Chair Alvarez received direct personal consultation on April 3 and May 31, 2024 — during ADA-protected medical leave — regarding the same institutional conditions the framework addresses, and made specific commitments for which no documented follow-through occurred before the framework's public-record entry.
- On July 16, 2025, LA County DPH Office of Violence Prevention transmitted written acknowledgment of BCCP® / B2C3A™ distributed to County governance, Board of Supervisors district offices, MHSOAC, DMH RTW, and CEOP — five days before BHSOAC Chief Counsel identified BCCP® / B2C3A™ as proprietary in writing.

These are not external allegations. They are the Commission's own documented record.

My concern is not solely retrospective. It is also prospective: whether publicly funded behavioral-health reform, contractor-facilitated framework development, and later implementation activity will incorporate adequate provenance, accessibility, civil-rights compliance, oversight, and fidelity safeguards where materially overlapping problem domains have already been raised through lived-experience-informed, licensed, mandated, ADA-period, civil-rights-protected, and public-record submissions.

Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.

Licensed Clinical Psychologist

Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model

Systems Equity & Family Advocate | CARE Court Petitioner (2024–2025)

U.S. Copyright TXu 2-486-534, effective April 15, 2025

U.S. Trademark Registration No. 8,107,651, SN 99168607, registered January 20, 2026; first use: April 10, 2025

ADA / Section 504 Written-Only Communication Accommodation

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CRD Case No. 202503-28458711

May 2026

## **EXHIBIT Q-T6A — Selected April 24 and May 22, 2025 Transcript Excerpts Tsai / LACDMH / DPH / Cal Voices / CPEHN / Alvarez / BCCP® / B2C3A™ May 2026**

### **Purpose of Exhibit**

This exhibit preserves selected verbatim transcript excerpts from the April 24 and May 22, 2025 BHSOAC sessions referenced in Exhibit Q-T6. The excerpts are organized by date, speaker, and topic to preserve administrative-record continuity, provenance, and context regarding BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) / B2C3A™ Pipeline Prevention Model notice, public-comment handling, workforce-integration discussion, IPF development, and related governance issues.

Where necessary for context, the exhibit annotations reference earlier administrative and consultation history, including the April and May 2024 BHSOAC Chair consultation chronology, ADA/IPM record-continuity concerns, and safety-intelligence advocacy preceding both IPF development and BCCP® public-record entry. Those references are included to explain the significance of the selected 2025 transcript excerpts and are not presented as additional transcript excerpts from the April 24 or May 22, 2025 recordings.

All April 24, 2025 timestamps refer to the publicly available BHSOAC recording for the April 24, 2025 Commission meeting:

<https://bhsoc.ca.gov/connect/commission-meetings/commission-meeting-april-24-2025/>

All May 22, 2025 timestamps refer to the publicly available BHSOAC recording for the May 22, 2025 Commission meeting:

<https://bhsoc.ca.gov/connect/commission-meetings/commission-meeting-may-22-2025/>

### **Pre-Hearing Transmission Note — April 24, 2025**

On April 23, 2025 and the morning of April 24, 2025 — before the 9:00 AM start of the hearing — written BCCP® / B2C3A™ materials were transmitted to Chair Alvarez and BHSOAC, including a QR-linked summary handout, the full framework handout, and a request for circulation and inclusion in the meeting record.

**Contextual Note:** Chair Alvarez had received direct personal notice of the institutional conditions the BCCP® / B2C3A™ framework was developed to address approximately eleven months before presiding over this hearing, through consultations on April 3 and May 31, 2024 during ADA-related medical leave and displacement periods. Those consultations are documented in Section I of Exhibit Q-T6 and in the core chronology of related submissions.

BCCP® / B2C3A™ is an independently authored, copyright- and trademark-registered public-health and systems-governance framework. Its development occurred during ADA-protected medical leave periods and through licensed clinical practice, but the framework itself is an independent intellectual and public-health contribution submitted into the public record, not an employment record or workplace document. Questions regarding its provenance, attribution, and

administrative handling are preserved through civil-rights, public-records, and oversight channels.

### **Section I — April 24, 2025 — Public Comments by Dr. Esroruleh T. Mohammad**

First public comment — Timestamp 00:25:38 – 00:27:46:

"My name is Dr. Esroruleh Muhammad. I'm a clinical psychologist, systems equity advocate, and the author of the BureauCare-to-Custody-Cemetery Pipeline — a framework now part of the commission's public record. Having been developed over a decade of clinical practice, systems analysis, and public service, this model identifies how fragmented oversight, procedural inequity, and institutional neglect displaces children, individuals, and families from care systems into crisis, into cycles of containment, homelessness, criminalization, and irreversible loss.

I speak today with deep concern about structural conditions that have persisted for nearly two decades under the Mental Health Services Act. Conditions reflected in the \$4 billion juvenile justice settlement reported on April 4th. That historic case is not just a legal reckoning. It is a systems failure warning and a call to action.

The Mental Health Services Act funding cannot ethically sustain bureaucracy while failing to deliver trauma-informed, culturally responsive pathways for families in crisis. Prevention must be more than a principle. It must be practice — practice that is rooted in lived experience, operational integrity, and public accountability.

The BureauCare-to-Custody-Cemetery Pipeline is a prevention framework — diagnostic in its clarity and prescriptive in its solutions. The tools are ready. What remains is not technical capacity, but the courage to lead with equity and the will to act on what communities have long named.

A QR code linking to the public summary has been shared with stakeholders. I remain available for consultation grounded in ethics, equity, and systems impact. Thank you."

Note: Name used at time of public comment. Framework author is Dr. Esroruleh T. Mohammad, Ph.D.

Second public comment — Timestamp 01:56:38:

"It's designed to diagnose and disrupt the very structural fragmentation and complexity raised here today... inclusion and attribution are not optional. They are accountability mechanisms... the question is not whether innovation is possible, but whether our institutions will act with the integrity to do it collaboratively, not quietly."

Third public comment — Timestamp 03:00:44:

"Commissioner Fernandez's and also Commissioner Chambers's recent acknowledgement of two critical issues, the harmful impact of bureaucratic complexity on care access and also the urgent

need for workforce equity and structural realignment — these are not abstract concepts. They're embedded in my model which was submitted into public record during the April 10 Behavioral Health Commission meeting and it addresses exactly how fragmentation, oversight breakdowns, and professional exclusion deepen community harm. Unfortunately, while portions of this model have been quietly implemented across MHSA planning, the anti-racism inclusion, solidarity, and empowerment division [ARISE, formerly ARDI], contract management and monitoring division [CMMD], and quality assurance [QA], they have been applied without author engagement, fidelity, or structural accountability. When frameworks designed to protect public health are absorbed without equity, the result is not reform — it's replication under new branding."

**Note:** Audio inaudible in available video recording at this timestamp. Transcript text derived from independently extracted session transcript and preserved for record-clarification purposes. I respectfully request written confirmation whether the Commission maintains an unedited audio or video archive of the April 24, 2025 session that may capture this comment more clearly, and whether that archive is subject to preservation and public records access.

## **Section II — April 24, 2025 — Commission Statements on Public Input and Prior Knowledge**

These statements were made approximately two hours after the framework's author's first public comment at timestamp 00:25:38 — during the same session — establishing that Commission leadership was actively soliciting prior framework knowledge after that knowledge had already been introduced into the record.

"This structure, the establishment of these committees, is a shift in the operations of this commission... we hope will offer additional opportunities for transparency, discussion, and public input... to ensure that the operations of this commission is meeting the intent of transparency of communication of building trust with our public." — Chair Mayra Alvarez, timestamp 02:09:55

"Those are some key questions that we want answered before we start convening this group. We don't want to waste people's time, both commissioners and members of the public, but at the same time, we want to utilize this structure to meaningfully collect information from the public." — Chair Mayra Alvarez, timestamp 02:15:19

"Many members of the public have been part of this commission for years longer than any of us and have reflections on what happened before, what could be more effective moving forward. So let's put that on the table." — Chair Mayra Alvarez, timestamp 02:15:37

"Do we have anybody that has any knowledge... like, wins, like, from these committees?... and the work that they did for the 14 plus years." — Commissioner Chambers, timestamp 02:16:19

"Last year, we asked the same thing... to pull together, what are the wins of the CLCC. Where has the committee weighed in on the commission's decision? So I actually think that is a very logical next step and some good background information to have in advance of that public conversation." — Chair Mayra Alvarez, timestamp 02:16:27

**Significance:** These statements are preserved because they establish that, during the same April 24, 2025 session in which BCCP® / B2C3A™ was introduced, Commission leadership publicly emphasized transparency, public input, trust-building, and the need to collect prior knowledge from members of the public. Chair Alvarez specifically invited reflections from members of the public who had been involved with the Commission for longer than current Commissioners, and Commissioner Chambers asked whether anyone had knowledge of committee work spanning fourteen-plus years. This context is material because the framework's author had already introduced BCCP® / B2C3A™ into the record earlier that same session and had submitted written materials before the hearing. The Commission's later "no responsive records" position and the documented omission of BCCP® / B2C3A™ materials from subsequent official meeting materials should be evaluated against the Commission's own stated interest in prior knowledge, public input, transparency, and meaningful collection of community-submitted information.

### Section III — April 24, 2025 — Overlapping Problem Domain Statements

"The secret sauce of peer respite programs is lost... because of the fact that they have to adhere to bureaucratic and administrative processes." — Commissioner Fernandez, timestamp 02:52:07

"Lighten the administrative burden on the front-end staff... the workforce doing the work are burning out because of requirements for... what they would call unrelated charting, billing type things." — Commissioner Will Lightbourne, timestamp 03:58:27

"[CDEPs] were most of the responses that came in... the importance of sort of finding ways of making [CDEPs] part of the regularized system of service that can be reimbursed in the behavioral health delivery system." — Commissioner Will Lightbourne

**Note:** Transcript auto-captioning renders "CDEP" as "CEPS" — this is a captioning error. Commissioner Lightbourne was presenting on Community Defined Evidence Practices (CDEPs), a recognized framework for culturally grounded, community-developed behavioral health interventions.

"When the person who is leaving hospital or leaving jail or prison wherever they may have been getting services doesn't just fall off the cliff and wind up returning to unhealthy activities because they weren't able to get easy access to services." — Commissioner Will Lightbourne, timestamp approx. 04:01:00

**Significance:** These statements — made by Commissioners at the same April 24, 2025 session where BCCP® / B2C3A™ was introduced — independently name the same institutional failure patterns the framework diagnoses: bureaucratic processes eroding community care programs, administrative burden contributing to workforce burnout, reimbursement barriers excluding community-defined practices, and service cliff effects contributing to crisis cycling. The record does not indicate that these observations were made in response to the framework's public comments. Rather, they are independent Commissioner-level articulations of materially overlapping problem domains, made at the same session, establishing that the diagnostic premise of BCCP® / B2C3A™ was not introduced into a vacuum but into a live institutional conversation about the same conditions.

## Section IV — April 24, 2025 — Commissioner Tsai / Cal Voices Exchange: The Knowledge Arc

### Commissioner Gary Tsai — SAPC Director, LA County Department of Public Health / BHSOAC Program Advisory Committee Chair Timestamp: 01:36:13 – 01:37:15

"I'm very familiar with our specialty substance use system. And we have a majority of a workforce that have lived experience. And I'm very familiar with this tension between how we can benefit from some of the standards and the financial benefits of Medi-Cal and balancing that with trying to create a simple way for us to actually benefit from Medi-Cal. Can you talk a little bit more about in the TA that you provide to try to make these complex processes simpler, what are some of the key pain points so that we can better understand how best to navigate that tension?"

### Cal Voices Director Clare Cortright — Response Timestamp: 01:37:18 – 01:39:14

"So, right now we have brick-and-mortar locations that are cash financed through MHSA that have never been inside the insurance model... One of the challenges is you operate a brick-and-mortar location, you want to become Medi-Cal billable, you have to get site certified. Well, how the heck do we do that?... Are our providers credentialed to be able to bill Medi-Cal? That's a big issue right now because a lot of our peers are not Medi-Cal certified... many of the organizations that are smaller and consumer operated — run by and for people with mental illness — have been used to having a much more simplified process outside of health insurance... What do I have to do to get site certified? What can I bill for? What do those reimbursement rates look like?... operating in a different system where it's based on provider rates is much more complicated and sometimes there's uncovered costs.

So that's that's about the extent of my knowledge." — Cal Voices Director Clare Cortright, timestamp 01:39:14

Significance: Commissioner Tsai's question about technical assistance to navigate systemic complexity and reduce implementation barriers — and Cortright's detailed inventory of site certification barriers, credentialing gaps, billing complexity, and consumer-operated organization burdens, closing with "that's about the extent of my knowledge" at timestamp 01:39:14 — together constitute an on-record articulation of the precise implementation barriers the B2C3A prescriptive model addresses. At the same session, the framework's author had already stated at timestamp 00:25:38: "What remains is not technical capacity, but the courage to lead with equity." The knowledge was offered on the record. The institutional response documented its own limits.

On the same day — April 24, 2025 — the framework's author transmitted a written follow-up directly to Dr. Tsai at [gtsai@dhs.lacounty.gov](mailto:gtsai@dhs.lacounty.gov) and the County BHC, CC'd to LACDMH Director Lisa Wong, Ms. Patty Choi, Ms. Rimmi Hundal, Ms. Kalene Gilbert, and the MHSA Planning Team, referencing BCCP® / B2C3A™ by name, identifying its authorship, and inviting structured collaboration grounded in attribution and shared accountability. No substantive response was received from Dr. Tsai, Director Wong, or any CC'd recipient.

**Cross-Reference Note:** Dr. Tsai's concurrent role as SAPC Director, LA County Department of Public Health, and BHSOAC Program Advisory Committee Chair means that a named County official with documented same-day written attribution notice of BCCP® / B2C3A™ held a governance role in the IPF (Innovation Partnership Fund) development process that followed. LA County DPH is also the department that had previously recruited the framework's author and whose Office of Violence Prevention, through Ms. Charlotte Robinson-Perkins, transmitted written acknowledgment of BCCP® / B2C3A™ on July 16, 2025 — distributed to County governance, oversight, Board of Supervisors district offices, CEO Family and Social Services, CEO's ARDI Unit, DMH RTW, CEOP, state-level MHSOAC and public safety channels — describing the framework as highlighting "critical intersections between budget priorities and ethical prevention strategies" and affirming the framework author's "leadership in systems reform and lived-expertise advocacy" and efforts to ensure "institutional accountability and structural integrity remain central to County planning.

A second written attribution notice was transmitted to Dr. Tsai on July 21, 2025 — in his capacity as SAPC Director, LA County DPH — CC'd to Dr. Barbara Ferrer, Director of LA County DPH, and numerous County, state, and oversight recipients, referencing BCCP® / B2C3A™ by name, copyright registration TXu 2-486-534, and authorship, and identifying specific County programs where framework constructs had been applied without attribution or consultation. That communication also acknowledged written confirmation received from Ms. Charlotte Robinson-Perkins, LA County DPH Office of Violence Prevention, following the July 16, 2025 PPSGC public comment — confirming DPH/OVP-level awareness of BCCP® / B2C3A™ at the departmental leadership level. No substantive response was received from Dr. Tsai, Dr. Ferrer, or any recipient in connection with the attribution and consultation concerns raised.

The Commission's subsequent PRA 2026-09 response stating no responsive records were located connecting BCCP® / B2C3A™ to IPF development must be understood in the context of this documented sequence: DPH/OVP staff had transmitted written acknowledgment of BCCP® / B2C3A™ distributed to Tsai's department five days before a direct attribution notice was sent to Tsai and Ferrer — and Commissioner Tsai held concurrent governance authority over the IPF development process through his PAC Chair role.

A third written clarification request was transmitted directly to Dr. Tsai on October 16, 2025 — CC'd to DPH-SAPC Monitoring, DPH Planning, the Mental Health Commission, the Board Executive Office, County Counsel, the Inspector General, DPH Director Ferrer, DPH-OVP, and the U.S. Department of Justice Disability Rights Section — specifically requesting clarification whether SAPC's Specialty SUD System Transformation framework, presented to the Behavioral Health Commission on October 9, 2025, draws upon, references, or aligns with BCCP® / B2C3A™, and requesting confirmation of how SAPC plans to integrate ADA-protected and lived-experience frameworks into future system-transformation initiatives to ensure authorship fidelity and statutory compliance under Sections 1557 and 504. No substantive response was received from Dr. Tsai, Dr. Ferrer, or any CC'd recipient.

Contemporaneous notes of the April 3 and May 31, 2024 consultations with Chair Alvarez — including Chair Alvarez's direct inquiry regarding Dr. Wong's response to the concerns presented

— are preserved separately and may be made available through appropriate civil rights channels upon request.

For record-continuity purposes, the County-level pattern of conduct reflected in this cross-reference — including the roles of named County officials in both the OVP acknowledgment sequence and the IPF development process — is also documented in LA County OCI Case No. 2025-23219 and CEOP Case No. BCCP-CEOP-ADA-2025-0806, both of which name relevant County officials and both of which have been pending without documented investigative action or written status update since August 2025. The completeness of both investigative records depends in part on the BHSOAC administrative record context preserved in these submissions.

### **Section V — April 24, 2025 — IPF Concept Evaluation Statements**

"Of the concepts that have been surfaced, which ones look like system change or have the potential for it versus which ones look like good innovative projects." — Commissioner Will Lightbourne, timestamp 03:50:22

"Those that are sort of listed here those that we've heard before those anything that may come in between here and may." — Commissioner Will Lightbourne, timestamp 03:51:15

"The commitment we have is to have stuff ready to go July 1, 2026." — Commissioner Will Lightbourne, timestamp 03:52:40

"The summaries done in this document don't do justice at all to what people had sent in... what I would anticipate is going to happen is between now and that May meeting staff will be working on all of the concepts that were submitted to sort of present substance more substance that does justice to the organizations that took the time to send their ideas in." — BHSOAC Staff, timestamp 03:54:09

"So all of these have come in. Whether they fit in the system change bucket or they're nice ideas is something which I think is the next step in our process to sort of engage on — to give them their good and just hearing." — Commissioner Will Lightbourne, timestamp 04:04:08

**Significance:** These statements document specific institutional commitments made on the public record at the same session where BCCP® / B2C3A™ was introduced — to distinguish system change concepts from innovative projects, to give every submitted concept a good and just hearing, and to present substance that does justice to what organizations submitted. The subsequent omission of BCCP® / B2C3A™ submissions from official May 22, 2025 meeting materials — acknowledged by Commission staff on June 6, 2025 — represents a documented failure to honor those commitments with respect to the framework's submissions specifically.

### **Section VI — May 22, 2025 — Commission and Contractor Statements**

"We really must change the way we've been doing things because we have not been able to deliver on the results that individuals, families, and communities deserve." — Chair Mayra Alvarez, May 22, 2025

"With Prop One, with the Behavioral Health Services Act, the commission has an opportunity to act with the urgency and boldness connecting across sectors and communities... to reimagine how we engage and serve people." — Chair Mayra Alvarez, May 22, 2025

"At that meeting, we heard loud and clear from the public the community's call to action for the commission to have a clear process grounded in transparency and accountability." — Chair Mayra Alvarez, May 22, 2025

"The commission's program advisory committee will help iterate key issues and develop a draft framework for the fund." — Chair Mayra Alvarez, May 22, 2025

"One of the contracts that we moved forward was engaging Marco Mijic in this work to have a third-party facilitator engage us in this conversation based on feedback from this commission and the public." — Chair Mayra Alvarez, May 22, 2025

"Frankly, we're not even going to be able to do that on our own. So, I'm holding this like what are we contributing to?... Something that comes up time and time again is navigation. What happens when my child has a crisis and do I know how to get the services — navigating these behemoth of systems is a challenge." — Chair Mayra Alvarez, BHSOAC, May 22, 2025

"What can we do in collaboration with our partners, our agencies, and private industry, philanthropy to move the needle." — Chair Mayra Alvarez, May 22, 2025

"Is there a single door or are there 20 doors that you have to go through? Someone can have a paved path to that door and someone has to go climbing mountains to get to that door." — Marco Mijic, Sellers Dorsey, IPF Facilitator, BHSOAC May 22, 2025

Are you better off in Medi-Cal versus private coverage? Are you better off in private? That's very problematic, right? That specialty mental health versus prevention also has something to play into this." — Chair Mayra Alvarez, May 22, 2025

**Significance:** These excerpts are preserved because they reflect a contractor-facilitated, framework-oriented IPF session in which materially similar problem domains — including workforce equity, navigation, systems burden, access, structural reform, and prevention infrastructure — were publicly discussed by the Commission Chair and the Sellers Dorsey facilitator after BCCP® / B2C3A™ had already entered the County public record on April 10, 2025, the state Commission record on April 24, 2025, and had been transmitted directly to Commission leadership in written submissions on April 23 and April 24, 2025. These excerpts do not establish derivation or adoption. They are also preserved in the context of Commission staff's June 6, 2025 acknowledgment that BCCP® / B2C3A™ submissions were omitted from the official May 22, 2025 meeting materials — the same meeting at which these contractor-facilitated IPF discussions occurred. At the same April 24 session, Commissioner Lightbourne committed to giving every submitted concept 'a good and just hearing' and BHSOAC Staff committed to presenting substance that 'does justice to the organizations that took the time to send their ideas in' — commitments that were not honored with respect to BCCP® / B2C3A™ submissions in the May 22 meeting materials. They preserve the chronological and substantive

context relevant to the Commission's search scope and the distinction between no responsive records located and broader questions of awareness and framework-adjacent discussion occurring during contractor-facilitated IPF development.

These statements are also significant because they were made approximately thirteen months after Chair Alvarez had received direct consultation from the framework's author regarding the same navigation failures, children in crisis, prolonged waitlists, and access barriers — concerns she characterized as warranting escalation to Commission legal counsel, the BHSOAC Executive Director, and the National Health Law Program — with no documented follow-through before the framework's public-record entry.

**Section VII — April 24, 2025 — Chambers / CPEHN / Cal Voices / Chair Alvarez  
Sequence Timestamps: 03:09:52 – 03:14:26**

Commissioner Chambers — Timestamps 03:09:52 – 03:12:38:

*"I want to just put it out for the record. The purpose of AB96 in our opinion as peer leaders is to integrate peer support workforce into the managed care plans... individuals with disability, with lived experience deserve this, right? And we don't believe nothing about us without us... We are already doing the work. Why not recognize us as people that don't want to be on disability? We want to work... our workforce has the right to be able to serve Californians. And I hope anybody else that's trying to oppose it can give us a reason why we should not be operating." — Commissioner Chambers, BHSOAC, April 24, 2025, timestamps 03:09:52 – 03:12:38*

BHSOAC Commissioner Madrigal-Weiss — Clarification Question — Timestamp 03:12:48:

*"Yes. Just for clarification, Commissioner Chambers — who specifically is opposing?"*

Transcript Note: Commissioner Chambers did not respond directly to this question. Deputy Director Zoeller of Cal Voices responded on behalf of the discussion.

Deputy Director Kendra Zoeller — Cal Voices, Legislative and External Affairs — Timestamp 03:13:00:

*"Um, there's no official opposition. So I don't want to speak for those that don't have an official position, but there were some issues raised by CPEHN — and I believe CBHDA was part of the conversations — but no official position."*

**Note:** Deputy Director Zoeller's identification of CPEHN and CBHDA is preserved because those organizations later became relevant to the May 22, 2025 record-handling sequence, including the inclusion of CPEHN's May 15, 2025 letter in official May 22 materials and the omission of BCCP® / B2C3A™ submissions from those same materials.

**CBHDA Note:** Deputy Director Zoeller also identified CBHDA — the California Behavioral Health Directors Association, whose membership includes LACDMH Director Wong — as having participated in the opposition conversations. This is preserved as governance and

institutional-awareness context because Director Wong and LACDMH leadership were separately included in the BCCP® / B2C3A™ attribution and non-response chronology.

Ruqayya Ahmad — California Pan-Ethnic Health Network (CPEHN) — Public Comment  
Timestamp: 03:22:06

“Hi everyone, Ruqayya Ahmad, she/her pronouns, from the California Pan-Ethnic Health Network or CPEHN. CPEHN is really proud to work closely with peer support specialists and community health workers... we really believe both workforces play a very critical role in healthcare and they bring distinct expertise, training pathways and histories... we really look forward to conversations to really ensure that the bill uplifts both workforces and centers equity.”

**Note — CPEHN Participation and Record Handling:** Ms. Ahmad’s public comment at timestamp 03:22:06 occurred after the framework author’s third public comment at timestamp 03:00:44, in which five County divisions were named and “replication under new branding” was stated on the record. This entry is not included to attribute knowledge, intent, or responsibility to Ms. Ahmad individually. It is included because CPEHN participated in the same April 24, 2025 hearing record in which BCCP® / B2C3A™ was introduced and attribution/provenance concerns were raised. CPEHN’s subsequent May 15, 2025 submission using overlapping workforce-integration language was included in official May 22 meeting materials, while BCCP® / B2C3A™ submissions from April 23–24 and May 19, 2025 were omitted and later archived separately. Ms. Ahmad later confirmed in writing on May 27, 2025 that CPEHN was not aware of the BCCP® / B2C3A™ frameworks.

**Note — CBHDA / LACDMH Governance Context:** CBHDA — the California Behavioral Health Directors Association, whose membership includes LACDMH Director Wong — was also named as having participated in the opposition conversations. No responsive action by Director Wong regarding the framework author’s concerns has been identified before April 16, 2025, when Director Wong stated during the PPSGC meeting: “I think it would be really useful for us to get together as a Department and advocate at the state level for technical assistance” (PPSGC transcript, 1:09:00). That statement occurred six days after BCCP® entered the public record and approximately 378 days after the April 3, 2024 BCCP-aligned consultation with BHSOAC Chair Alvarez, during which Chair Alvarez identified possible next steps including review of County-level audit processes concerning Medi-Cal care-access violations.

Chair Mayra Alvarez — Response — Timestamp 03:13:28 – 03:14:26:

*"Thank you. I think what I have heard in the community has been that there is a broader conversation around how are we supporting community workforce more broadly — whether that's peers, community health workers, promotoras, doulas. There is this big movement by our Medi-Cal team to integrate this workforce but it's haphazard. There isn't a real strategy. There isn't consideration for how that workforce should be paid, how much the quantity at which you're billing these services, and they're lumping everything and trying to move things in a patchwork way.*

*So I think there's some interest in ensuring that there's a more strategic conversation around that. I definitely think that there is a general sharing of commitment to uplifting peers as*

*community leaders in having that workforce component, but I think that's some of the questions that want to get ironed out."*

Commissioner Madrigal-Weiss — Timestamp 03:14:23:

*"So is it because they want to be more inclusive?"*

Chair Mayra Alvarez — Timestamp 03:14:26:

*"Advocates? Yes."*

Those remarks were made during the same hearing sequence in which BCCP® / B2C3A™ public comments and provenance concerns entered the administrative record.

**Significance:** Commissioner Chambers' statements about lived-experience workforce integration — and Deputy Director Zoeller's identification of CPEHN and CBHDA as having raised opposition concerns — occurred at the same session where BCCP® / B2C3A™ was introduced as a framework developed through lived experience, clinical practice, and documented workforce equity concerns.

Chair Alvarez's description of the workforce-integration system as "haphazard," lacking a "real strategy," and moving in a "patchwork" manner — made approximately eleven months after she had received multiple direct personal consultations from the framework's author regarding materially related access, workforce, prevention, and systems-governance concerns during ADA-protected medical leave periods — documents that the institutional conditions BCCP® / B2C3A™ diagnoses remained unaddressed and were publicly acknowledged at the same session where the framework was introduced.

Commissioner Gary Tsai — SAPC Director at the Los Angeles County Department of Public Health and BHSOAC Program Advisory Committee Chair for IPF development — asked on April 24, 2025 how complex Medi-Cal processes could be made simpler and how key "pain points" in navigating those processes could be identified. That question is significant because it publicly reiterated access, administrative-burden, and Medi-Cal complexity concerns materially aligned with issues the framework author had raised directly with BHSOAC Chair Alvarez approximately one year earlier, during ADA-protected medical leave on April 3, 2024.

**Contextual Background:** On April 19, 2022 — the same date as the framework author's first ADA/IPM proceeding — departing DMH Director Dr. Jonathan Sherin stated:

*"I know firsthand that it isn't easy to work within a system that is often focused more on taking care of various bureaucratic processes than on the communities we are here to serve."* — Dr. Jonathan Sherin, M.D., Ph.D., departing LACDMH Director, April 19, 2022

That statement shows that the bureaucracy-over-community-care problem was publicly identified by LACDMH leadership three years before Commissioner Tsai raised Medi-Cal complexity and "pain points" at the April 24, 2025 BHSOAC hearing, and before BCCP® entered the public record. The April 24 exchange is therefore significant not as an isolated policy question, but as

part of a documented institutional arc: the same access, prevention, administrative-burden, and systems-governance concerns were named by departing leadership in 2022, experienced by the framework author through ADA/IPM proceedings, raised directly with BHSOAC Chair Alvarez during ADA-protected medical leave in 2024, and later formalized through the BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) and its prescriptive B2C3A™ Pipeline Prevention Model.

That institutional arc is further significant because BCCP® / B2C3A™ public-safety advocacy, lived-experience submissions, and related ADA/IPM, BHC, PPSGC, and BHSOAC record-continuity concerns were repeatedly affected by incomplete responses, omissions, delayed archiving, and nonresponsive routing, requiring preservation through safety-intelligence documentation, CPRA requests, written-only ADA accommodation, copyright/trademark documentation, and civil-rights record-preservation advocacy.

Chair Alvarez’s characterization of CPEHN and CBHDA’s opposition as advocacy-motivated — “Advocates? Yes” — is preserved because CPEHN subsequently submitted a May 15, 2025 letter using overlapping language that was included in official May 22 meeting materials. By contrast, BCCP® / B2C3A™ submissions from April 23–24 and May 19, 2025 were omitted from those same materials and retroactively archived separately, with Commission staff apologizing for the omission on June 6, 2025 — fifteen days after the May 22 BHSOAC hearing at which CPEHN’s letter and Sellers Dorsey’s private-equity contractor-facilitated IPF session materials remained in the official record.

That sequence raises administrative-record, ADA-access, provenance, public-integrity, and intellectual-property questions regarding how BHSOAC treated public-safety data-based frameworks, civil-rights and disability-access protections, lived-experience and CARE Court petitioner contributions, and copyright/trademark-protected materials relative to other advocacy and private-equity contractor-facilitated materials.

The overlapping roles held by Commissioner Gary Tsai — SAPC Director at LA County DPH and BHSOAC Program Advisory Committee Chair for IPF development — Dr. Keyondra Bunch-Wilcox — County-employed psychologist, SEIU 721 liaison, and BHSOAC Commissioner — and Chair Alvarez — BHSOAC Chair and prior direct consultant to the framework author during ADA-protected medical leave — are preserved as governance, institutional-awareness, and potential conflict-of-interest observations relevant to the Commission’s search scope, IPF development chronology, and the distinction between “no responsive records located” and broader questions of knowledge during IPF development.

During the April 3 and May 31, 2024 consultations, Chair Alvarez characterized the concerns presented as warranting follow-up action — including review of County-level audit processes, consultation with the BHSOAC Executive Director and legal counsel, and potential elevation of the concerns to the Board of Supervisors and potentially state legislative channels. No documented follow-through on those commitments occurred before the framework author's third displacement began July 19, 2024.

Commissioner Madrigal-Weiss’s clarification question and Deputy Director Zoeller’s naming of CPEHN and CBHDA establish that the same organizations subsequently involved in overlapping framework submissions and administrative-record handling were already part of the documented opposition landscape at the April 24 hearing.

## Section VIII — Integrated Significance

The April 24, 2025 hearing record documents a single public proceeding in which the BCCP® / B2C3A™ framework's diagnostic premise was introduced at timestamp 00:25:38, then independently echoed through Commissioner inquiry, provider response, and Chair-level synthesis across the following four hours of the same session. The Tsai / Cal Voices / Alvarez exchanges move from the BCCP diagnostic premise of fragmented systems and institutional neglect into implementation mechanics: billing, Medi-Cal certification, workforce recognition, community-based provider burden, and the absence of a coherent strategy — the precise problem domains the B2C3A prescriptive model addresses.

The transcript does not show isolated overlapping phrases. It shows a living institutional conversation about the exact problems the framework was developed to address, occurring at the same session where the framework and an explicit offer of consultation were introduced into the Commission record. Commissioner Lightbourne committed to giving every submitted concept "a good and just hearing." BHSOAC Staff committed to presenting substance that "does justice to the organizations that took the time to send their ideas in." Those commitments were made at the same session — and the subsequent omission of BCCP® / B2C3A™ submissions from official May 22 meeting materials, acknowledged by Commission staff on June 6, 2025, represents a documented failure to honor them.

### Sources

The transcript excerpts in this exhibit are drawn from the following publicly available BHSOAC records:

- BHSOAC April 24, 2025 Commission Meeting, public recording: <https://bhsoac.ca.gov/connect/commission-meetings/commission-meeting-april-24-2025/>
- BHSOAC May 22, 2025 Commission Meeting, public recording: <https://bhsoac.ca.gov/connect/commission-meetings/commission-meeting-may-22-2025/>
- BHSOAC May 22, 2025 Official Meeting Materials: [https://bhsoac.ca.gov/wp-content/uploads/BHSOAC\\_Materials\\_05222025\\_ADA\\_2.pdf](https://bhsoac.ca.gov/wp-content/uploads/BHSOAC_Materials_05222025_ADA_2.pdf)
- BHSOAC May 22, 2025 Written Public Comment: [https://bhsoac.ca.gov/wp-content/uploads/2025\\_05\\_Written\\_Public\\_Comment.pdf](https://bhsoac.ca.gov/wp-content/uploads/2025_05_Written_Public_Comment.pdf)

### Document Identification

**Filename:** Exhibit\_Q-

T6A\_April24\_May22\_2025\_Transcript\_Excerpts\_Tsai\_LACDMH\_DPH\_CalVoices\_CPEHN\_Alvarez\_BCCP\_B2C3A\_May2026.pdf

Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.

Licensed Clinical Psychologist

Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model

Systems Equity & Family Advocate | CARE Court Petitioner (2024–2025)

U.S. Copyright TXu 2-486-534, effective April 15, 2025

U.S. Trademark Registration No. 8,107,651, SN 99168607, registered January 20, 2026; first use: April 10, 2025

ADA / Section 504 Written-Only Communication Accommodation

[tamimmohammad@gmail.com](mailto:tamimmohammad@gmail.com)

CRD Case No. 202503-28458711

May 2026

**Exhibit Q-T6B****Comparative Chronology of Contractor-Facilitated IPF Language and Related Clarification Context****Submitted for chronology, provenance, governance-risk, and record-clarification purposes only**

Dr. Esroruleh T. Mohammad, Ph.D.

Licensed Clinical Psychologist

Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model

U.S. Copyright TXu 2-486-534, effective April 15, 2025

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ADA / Section 504 Written-Only Communication Accommodation

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CRD Case No. 202503-28458711

May 2026

**Purpose of Exhibit**

This exhibit is submitted for chronology, provenance, governance-risk, and record-clarification purposes only. It does not assert misconduct, fraud, theft, or unlawful conduct by any contractor, does not adjudicate adoption or derivation, and does not request substantive determination of intellectual-property rights through this filing. Rather, this exhibit preserves a limited comparative chronology relevant to the Commission's PRA 2026-09 response and to the distinction between:

- no responsive records located; and
- broader questions of awareness, chronology, contractor-facilitated process, and framework-adjacent language appearing during the same period.

The observations preserved here are based on publicly available materials reviewed by the undersigned, including Commission meeting transcripts, publicly posted meeting materials, and archived public web captures. Any similarities noted herein are presented as timing- and chronology-based observations, not as definitive proof of causation, copying, derivation, intent, or internal knowledge. The undersigned does not claim access to internal contractor deliberations, draft history, procurement communications, or other nonpublic materials, and therefore preserves this exhibit as a limited public-record chronology rather than a definitive account of internal decision-making.

**I. Relevant Timing and Context**

The chronology reflected in this exhibit includes the following sequence:

- April 10, 2025 — BCCP® / B2C3A™ entered the County public record through Behavioral Health Commission proceedings.

- April 24, 2025 — BCCP® / B2C3A™ materials were submitted into the state-level Commission record.
- May 22, 2025 — a contractor-facilitated IPF discussion occurred before BHSOAC, including discussion of structural reform, navigation, equity, framework development, and cross-sector systems change. Chair Alvarez publicly identified Sellers Dorsey as the contractor engaged to help prioritize concepts and develop a draft framework for the IPF — a publicly funded facilitation role explicitly tied to public input and concept refinement.
- May 23, 2025 — a formal written clarification request was sent to Sellers Dorsey and BHSOAC concerning the apparent use of conceptual framing, implementation logic, and systems-redesign language materially similar to BCCP® / B2C3A™. No acknowledgment or response was received from BHSOAC, LACDMH, or Sellers Dorsey.
- June 6, 2025 — BHSOAC later acknowledged omission-related issues affecting April and May 2025 submissions.
- May 15, 2025 — a written equity principles letter from the California Pan-Ethnic Health Network was submitted to the Commission and included in the official May 22, 2025 meeting materials. BCCP® / B2C3A™ written submissions from April 23–24, 2025 — predating the CPEHN letter by approximately three weeks — and a May 19, 2025 submission were omitted from those same official materials and retroactively housed in a separate Written Public Comment link following the June 6, 2025 omission acknowledgment. The CPEHN organization subsequently confirmed in writing that it was not aware of the BCCP® / B2C3A™ frameworks — establishing the overlapping language as independent convergence and the record-handling asymmetry as a documented administrative fact. Those omitted submissions included copyright notice, authorship identification, and requests for attribution — without written acknowledgment from BHSOAC, LACDMH, or Sellers Dorsey regarding attribution or consultation
- July 15, 2025 — the earliest archived capture identified in the reviewed public web-capture record for Sellers Dorsey's What We Do page, postdating the May 22, 2025 BHSOAC facilitation presentation, the May 23, 2025 clarification request, and the June 6, 2025 BHSOAC omission acknowledgment.

This sequence is relevant because the contractor-facilitated IPF discussion and related public materials occurred after BCCP® / B2C3A™ had entered the County and state public record, and during a period in which directly relevant submissions were later acknowledged to have been omitted or delayed.

Additional relevant context is reflected in the May 22, 2025 Sellers Dorsey slide deck presented to the Commission, which publicly framed the IPF process around “equity, community partnership, and system transformation,” and included discussion of “integrate systems,” “urgency,” “governance and decision-making,” “capacity-building and technical assistance,” “equity guardrails,” “community feedback mechanisms,” and “support transformational models integrating lived experience, cultural relevance, and system redesign” as documented in publicly available May 22, 2025 BHSOAC meeting materials. These materials are significant not as proof of adoption, but because they demonstrate that the contractor-facilitated role extended beyond general facilitation into concept prioritization, investment-pillar framing, governance design, and

framework-development activity during the same period in which BCCP® / B2C3A™ had already entered the County and state public record.

For chronology and notice purposes, the following documented prior-notice sequence is preserved:

- **April 3, 2024** — complainant met directly with Chair Alvarez during the second involuntary ADA medical displacement — addressing child fatality prevention concerns, employee fatality concerns, obstruction of licensed clinical ethics functions, postvention-related issues at a contracted legal-entity provider, and systems-governance concerns. This meeting occurred while complainant was on ADA medical leave and before the third displacement began.
- **May 31, 2024** — complainant met again with Chair Alvarez — addressing the same systemic concerns — before the third and final involuntary ADA medical displacement began July 19, 2024. Both meetings established direct personal notice at the Commission Chair level of the institutional conditions the BCCP®/B2C3A™ framework was developed to diagnose.
- **April 16, 2025** — six days after BCCP®/B2C3A™ entered the County public record — LACDMH Director Wong publicly stated at the PPSGC session that the Department needed to "advocate at the state level for technical assistance" as programs shifted from prevention to early intervention. This statement was made during the same post-BCCP® public-record period in which complainant — on involuntary ADA medical leave — had already been providing state-level advocacy, consultation, and technical assistance through the BCCP®/B2C3A™ frameworks.
- **April 23, 2025** — written submission transmitted to BHSOAC before the April 24, 2025 Commission hearing — establishing written pre-hearing notice of BCCP®/B2C3A™ to Commission leadership.
- **April 24, 2025 — 7:30 AM** — written submission transmitted to BHSOAC approximately ninety minutes before the 9:00 AM start of the Commission hearing — establishing same-morning written notice to Chair Alvarez before she presided over the session at which BCCP®/B2C3A™ was publicly introduced into the state-level Commission record.
- **April 30, 2025** — written follow-up transmitted directly to Chair Alvarez, LACDMH Director Wong, Dr. Gary Tsai, and the MHSA Planning Team — referencing BCCP® / B2C3A™ by name, identifying authorship, noting that multiple Commissioners including Dr. Tsai had raised concerns directly related to the framework during the April 24 session, and requesting acknowledgment and engagement by May 6, 2025. No substantive response was received from Chair Alvarez, Director Wong, Dr. Tsai, or any recipient.
- **May 19, 2025** — written submission transmitted to BHSOAC approximately three days before the May 22, 2025 session at which Chair Alvarez publicly introduced Sellers Dorsey as the contractor engaged to help prioritize concepts and develop a draft framework for the IPF.

This notice sequence establishes that Chair Alvarez presided over the May 22, 2025 contractor-facilitated IPF session — at which the Sellers Dorsey facilitator used structural access metaphors and navigation language materially overlapping with BCCP®/B2C3A™ problem domains —

with prior personal consultation notice dating to April 2024, written submission notice before the April 24 hearing, and written submission notice before the May 22 session. The state-level TA function that Director Wong publicly identified as a departmental need on April 16, 2025 was already being provided through complainant's advocacy — while complainant remained on involuntary ADA medical leave without accommodation resolution, attribution, or compensation.

The following statements were made during the May 22, 2025 BHSOAC session and are preserved here as part of the public meeting record. They are presented as documented public statements — not as proof of derivation or adoption — but as relevant context for the Commission's search scope and the distinction between no responsive records located and broader questions of awareness and framework-adjacent discussion occurring during the same period.

*"Frankly, we're not even going to be able to do that on our own. So, I'm holding this like what are we contributing to? ... Something that comes up time and time again is like navigation. What happens when my child has a crisis and do I know how to get the services ... navigating these behemoth of systems is a challenge."* — Chair Mayra Alvarez, May 22, 2025

*"What can we do in collaboration with our partners, our agencies, and private industry, philanthropy to move the needle."* — Chair Mayra Alvarez, BHSOAC May 22, 2025

*"Is there a single door or are there 20 doors that you have to go through? Someone can have a paved path to that door and someone has to go climbing mountains to get to that door."* — Marco Mijic, Sellers Dorsey facilitator, BHSOAC May 22, 2025

*"Are you better off in medical versus private coverage? Are you better off in private? That's very problematic, right? That specialty mental health versus prevention also has something to play into this."* — Chair Mayra Alvarez, BHSOAC May 22, 2025

These statements publicly identify access barriers, navigation challenges, coverage fragmentation, prevention infrastructure gaps, and systems-burden concerns. These same concerns were described in complainant's April 10, 2025 BHC and April 24, 2025 BHSOAC public record submissions — predating this session. The sequence in which Chair Alvarez identified the navigation problem, the Sellers Dorsey facilitator reframed it through structural access metaphors, and Chair Alvarez returned to coverage fragmentation and prevention — all occurring in a contractor-facilitated IPF development session — is preserved here as public record context relevant to the Commission's search scope and awareness analysis.

Source: BHSOAC May 22, 2025 Commission meeting — publicly recorded session. Recording available through BHSOAC public records.

## **II. What This Exhibit Preserves**

This exhibit preserves the limited observation that concepts associated with:

- structural reform,
- lived experience,
- cultural relevance,
- trauma-responsive transformation,
- implementation fidelity,
- cross-sector systems change,
- governance and decision-making, and
- capacity-building and workforce-oriented support

appear in the May 22, 2025 contractor-facilitated BHSOAC presentation but were not identified in the reviewed captures of Sellers Dorsey's public-facing website materials spanning January 2025 through January 2026.

This exhibit does not present that timing comparison as proof of adoption, misconduct, or direct derivation. It preserves the chronology because the timing may be relevant to search scope, contractor-facilitated awareness, public-record continuity, provenance preservation, and whether any oversight, integrity, or fidelity safeguards existed where contractor-supported materials operated in materially overlapping problem domains.

### **III. Prior Clarification Request and Non-Response Chronology**

On May 23, 2025, a written clarification request was sent to Sellers Dorsey and copied to BHSOAC and LACDMH leadership concerning the apparent use of conceptual framing and systems-redesign language closely reflecting BCCP® / B2C3A™. That request noted that the framework had already been:

- submitted in writing,
- presented orally,
- distributed to Commission and Departmental leadership,
- registered with the U.S. Copyright Office, and
- disseminated publicly through publication and linked materials.

The request further sought clarification regarding:

- whether BCCP® / B2C3A™ had been referenced, adapted, or consulted directly or indirectly in OAC / MHSA planning or technical-assistance materials;
- what attribution protocols, if any, applied to frameworks submitted through formal public record by licensed practitioners and lived-experience-informed contributors; and
- whether formal engagement would be considered if the framework continued to inform planning, policy, or systems-level implementation.

No written acknowledgment or substantive response was received from Sellers Dorsey, BHSOAC, or LACDMH.

For the administrative record, the May 23, 2025 clarification request was the first of fifteen written communications transmitted to Sellers Dorsey between May 23, 2025 and March 17,

2026, including messages sent to general company channels and to Marco Mijic, the Chair-introduced facilitator for the May 22, 2025 IPF discussion. No written acknowledgment or substantive response has been received from Sellers Dorsey during that period. BHSOAC Chair Alvarez and LACDMH Director Wong similarly did not respond to the contractor-specific clarification questions raised in that initial request.

The fifteenth and final communication — dated March 17, 2026 — constituted a formal final request for written confirmation of receipt, designation of a records contact, and accessibility compliance clarification, explicitly invoking complainant's ADA Title II and Section 504 written-only communication accommodation as confirmed by the California Civil Rights Department. That communication was addressed to Marco Mijic directly, as well as to general company channels, and stated that the absence of written acknowledgment within ten business days would result in the matter being considered administratively closed at Sellers Dorsey's level. No response was received. The ten-business-day deadline passed without acknowledgment.

This non-response chronology is preserved because it establishes that the contractor-facilitated process concern was raised at the earliest possible opportunity — before the IPF framework was finalized — and that no documented engagement, routing, or review occurred in response. This non-response persisted through the IPF framework adoption on November 26, 2025, through the federal trademark registration of BCCP® on January 20, 2026, through the IPF RFP outline approval on January 22–23, 2026, and through a formal final request with an explicit ten-business-day response deadline transmitted on March 17, 2026 — which also received no acknowledgment. This sequence is preserved not to relitigate the underlying request, but to document that contractor-related chronology and notice issues were raised contemporaneously and remained unanswered throughout the IPF development and finalization period.

#### **IV. Comparative Observations**

For chronology and record-clarification purposes, the following comparative observations are preserved:

- Concepts associated with administrative burden, fragmentation, and governance-related barriers to care appeared in later May 2025 contractor-facilitated materials in ways that were not comparably visible in earlier reviewed public-facing contractor language.
- Concepts associated with trauma-responsive transformation, cross-sector solutions, cultural relevance, lived experience, implementation fidelity, and structurally oriented systems change similarly appeared in the May 22, 2025 contractor-facilitated BHSOAC presentation but were not identified in Sellers Dorsey's public-facing website materials across any reviewed capture date.
- These later materials arose after BCCP® / B2C3A™ had already entered the County and state public record and after related public comments and written submissions had been transmitted.
- During the same period, directly relevant BCCP® / B2C3A™ submissions were subject to omission or delayed posting issues later acknowledged by Commission staff.

Accordingly, this exhibit preserves a chronology question, not a merits conclusion, regarding whether the Commission's no responsive records position adequately accounted for contractor-facilitated materials, related public-facing language, and the broader sequence of submissions, concept development, and framework-adjacent materials through which awareness could have been present.

## V. Governance and Oversight Significance

If the Commission engaged contractor-supported facilitation to help prioritize concepts, align principles, and support framework development in response to public feedback, then the relevant issue is not only whether an explicit attribution record exists, but also:

- whether contractor-facilitated materials and discussions were included within the scope of the Commission's search;
- whether the Commission maintained any process for distinguishing ordinary public comment from repeated externally authored framework submissions materially relevant to later funded reform activity;
- whether any provenance, accessibility, or fidelity safeguards existed where contractor-supported work operated in materially overlapping domains previously introduced through lived-experience-informed, ADA-period, or CARE Court-related public submissions; and
- whether the omission or delayed handling of directly relevant submissions affected the completeness of the Commission's later record position.

These questions are not external to the Commission's mandate. BHSOAC's enabling legislation, governance documents, and IPF RFA expressly emphasize lived experience and community leadership as core cross-cutting elements of funded reform activity. The Commission's oversight and accountability functions therefore extend, at minimum, to ensuring that contractor-supported framework development does not replicate the same patterns of exclusion, erasure, or inaccessibility that the IPF is intended to remedy.

Specifically, where a contractor engaged for publicly funded IPF facilitation operates in materially overlapping domains with frameworks submitted by a CARE Court petitioner, ADA-displaced licensed psychologist, and published scholar navigating the systems the IPF seeks to reform, the Commission's oversight mandate requires at minimum a process for distinguishing that situation from ordinary public comment, especially where no documented provenance review, attribution safeguard, or accessibility accommodation is reflected in the record.

This accessibility concern is further documented by the fact that a formal written communication explicitly invoking complainant's ADA Title II and Section 504 written-only communication accommodation — as confirmed by the California Civil Rights Department — was transmitted to Sellers Dorsey on March 17, 2026, and received no written acknowledgment or response.

The absence of any documented response to the May 23, 2025 clarification request, transmitted to Sellers Dorsey, BHSOAC, and LACDMH leadership, together with the subsequent

continuation of contractor-facilitated IPF development without documented engagement, raises the question of whether any such process existed or was applied here.

The May 22, 2025 ‘Next Steps’ slide identified the following sequence: ‘Convene Program Advisory Committee,’ ‘Engage community and public,’ ‘Consult with state partners,’ and ‘Develop framework for approval.’ In that context, the relevant question is not only whether prior BCCP® / B2C3A™ submissions were expressly cited, but whether the Commission maintained any process to ensure that community-informed, ADA-period, or lived-experience-informed framework submissions were preserved, distinguished, and handled with adequate provenance, accessibility, and fidelity safeguards as later framework-development activity proceeded.

The May 22, 2025 slide materials also reinforce that contractor-supported IPF work was not limited to neutral facilitation, but extended to framing investment pillars, governance, technical assistance, community feedback, and next-step framework development, which heightens the importance of provenance, accessibility, and fidelity safeguards.

## VI. Public-Facing Comparative Language Review

Any similarities noted in the tables below are presented as timing- and chronology-based observations only — not as definitive proof of causation, copying, derivation, or intent.

Archived public-web-capture materials derived from the Internet Archive, a publicly accessible nonprofit digital library, document the following comparative chronology of Sellers Dorsey's publicly available website language:

**Who We Are Page — Sellers Dorsey — Archived Public Web Captures** Source: Internet Archive / Wayback Machine — [sellersdorsey.com/who-we-are/](https://www.sellersdorsey.com/who-we-are/)

<b>Term / Theme</b>	<b>Jan 23, 2025</b>	<b>Mar 21, 2025</b>	<b>Apr 18, 2025</b>	<b>May 30, 2025</b>	<b>Oct 13, 2025</b>	<b>Jan 13, 2026</b>	<b>May 22, 2025 BHSOAC Presentation</b>
Equity	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Structural reform	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Cultural relevance	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Lived experience	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Trauma-responsive transformation	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Implementation fidelity	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present

<b>Term / Theme</b>	<b>Jan 23, 2025</b>	<b>Mar 21, 2025</b>	<b>Apr 18, 2025</b>	<b>May 30, 2025</b>	<b>Oct 13, 2025</b>	<b>Jan 13, 2026</b>	<b>May 22, 2025 BHSOAC Presentation</b>
Systems change / cross-sector	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Administrative burden / fragmentation	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Governance and decision-making	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Pipeline	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Present
Vulnerable populations	Present	Present	Present	Present	Present	Present	Present
Access / quality / outcomes	Present	Present	Present	Present	Present	Present	Present
Underserved communities	Not identified	Not identified	Not identified	Not identified	Present	Present	Present

**What We Do Page — Sellers Dorsey — Archived Public Web Captures** Source: Internet Archive / Wayback Machine — [sellersdorsey.com/what-we-do/](https://sellersdorsey.com/what-we-do/) Note: No captures were identified before July 15, 2025 in the reviewed public web-capture record — with the earliest available capture postdating the May 22, 2025 BHSOAC facilitation presentation, the May 23, 2025 clarification request, and the June 6, 2025 BHSOAC omission acknowledgment.

<b>Term / Theme</b>	<b>Jul 15, 2025</b>	<b>Sep 18, 2025</b>	<b>Nov 18, 2025</b>	<b>Dec 11, 2025</b>	<b>May 22, 2025 BHSOAC Presentation</b>
Equity	Not identified	Not identified	Not identified	Not identified	Present
Structural reform	Not identified	Not identified	Not identified	Not identified	Present
Cultural relevance	Not identified	Not identified	Not identified	Not identified	Present
Lived experience	Not identified	Not identified	Not identified	Not identified	Present
Trauma-responsive transformation	Not identified	Not identified	Not identified	Not identified	Present
Implementation fidelity	Not identified	Not identified	Not identified	Not identified	Present
Pipeline	Not identified	Not identified	Not identified	Not identified	Present

<b>Term / Theme</b>	<b>Jul 15, 2025</b>	<b>Sep 18, 2025</b>	<b>Nov 18, 2025</b>	<b>Dec 11, 2025</b>	<b>May 22, 2025 BHSOAC Presentation</b>
Administrative burden / fragmentation	Not identified	Not identified	Not identified	Not identified	Present
Governance and decision-making	Not identified	Not identified	Not identified	Not identified	Present
Child and Family Well-Being	Present	Present	Present	Present	Present
Vulnerable populations	Present	Present	Present	Present	Present
Access / outcomes	Present	Present	Present	Present	Present

Note: The Sellers Dorsey website underwent a structural redesign between May 30 and October 13, 2025 — during the IPF development period — with no earlier archived captures of the What We Do page identified in the reviewed public web-capture record before July 15, 2025. The term "underserved communities" appeared in the Who We Are page for the first time in the October 13, 2025 capture — absent from all four pre-October 2025 captures. The Child and Family Well-Being Center of Excellence appears as a named service area from the earliest available What We Do capture — July 15, 2025 — postdating the BHSOAC facilitation period.

This comparative chronology is preserved observationally. It documents that themes materially overlapping with BCCP®/B2C3A™ problem domains appeared in Sellers Dorsey's May 22, 2025 BHSOAC facilitation presentation but were not identified in the reviewed captures of the firm's public-facing website materials during the same general period. This exhibit does not assert that those observations constitute proof of adoption, derivation, or misconduct. Rather, the publicly funded nature of the contract, the contractor's facilitation role in IPF concept development, and the documented divergence between facilitation language and public identity language are relevant to the Commission's search scope, contractor-facilitated awareness, and the distinction between no located responsive records and broader questions of framework-adjacent awareness.

Full archived web-capture materials are preserved separately and may be made available upon written request for record-clarification purposes.

### **Concluding Preservation Statement**

This exhibit is submitted solely to preserve chronology, contractor-facilitated process context, provenance continuity, and related governance-risk questions relevant to PRA 2026-09. It is not submitted to request immediate adjudication of ownership, contractor misconduct, or substantive policy adoption.

The concern is not only retrospective. It is also prospective: whether the Commission's IPF process will incorporate adequate fidelity, provenance, accessibility, and public-safety safeguards when materially similar problem domains are translated into funded reform activity. A positive future path would require transparency regarding chronology, contractor role,

community-informed framework continuity, and implementation safeguards so that reform activity does not reproduce the same fragmentation, burden, or erasure it seeks to remedy.

I respectfully request that this exhibit and associated administrative-record materials be preserved as part of the Commission's administrative record and, to the extent appropriate under Commission procedures, associated with the May 28, 2026 meeting record for purposes of continuity and transparency.

Respectfully submitted,

Dr. Esroruleh T. Mohammad, Ph.D.  
Licensed Clinical Psychologist  
Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model  
Systems Equity & Family Advocate | CARE Court Petitioner (2024–2025)  
U.S. Copyright TXu 2-486-534, effective April 15, 2025  
U.S. Trademark Registration No. 8,107,651, SN 99168607, registered January 20, 2026; first use: April 10, 2025  
ADA / Section 504 Written-Only Communication Accommodation  
[tammohammad@gmail.com](mailto:tammohammad@gmail.com)  
CRD Case No. 202503-28458711  
May 2026

Administrative Record / Rights Notice: This exhibit is submitted solely for chronology, provenance, contractor-process, and administrative-record clarification purposes. BCCP® / B2C3A™ are referenced herein for provenance, continuity, and record-clarification purposes only.

## REFERENCES Publicly Verifiable Sources — Exhibit Q-T6B

### I. Sellers Dorsey — Archived Public Web Captures *Source: Internet Archive / Wayback Machine*

Who We Are Page — January 23, 2025

<https://web.archive.org/web/20250123143441/https://www.sellersdorsey.com/who-we-are/>

Who We Are Page — March 21, 2025

[https://web.archive.org/web/20250321000000\\*/https://www.sellersdorsey.com/who-we-are/](https://web.archive.org/web/20250321000000*/https://www.sellersdorsey.com/who-we-are/)

Who We Are Page — April 18, 2025

[https://web.archive.org/web/20250418000000\\*/https://www.sellersdorsey.com/who-we-are/](https://web.archive.org/web/20250418000000*/https://www.sellersdorsey.com/who-we-are/)

Who We Are Page — May 30, 2025

[https://web.archive.org/web/20250530000000\\*/https://www.sellersdorsey.com/who-we-are/](https://web.archive.org/web/20250530000000*/https://www.sellersdorsey.com/who-we-are/)

Who We Are Page — October 13, 2025

[https://web.archive.org/web/20251013000000\\*/https://www.sellersdorsey.com/who-we-are/](https://web.archive.org/web/20251013000000*/https://www.sellersdorsey.com/who-we-are/)

Who We Are Page — January 13, 2026

[https://web.archive.org/web/20260113000000\\*/https://www.sellersdorsey.com/who-we-are/](https://web.archive.org/web/20260113000000*/https://www.sellersdorsey.com/who-we-are/)

What We Do Page — July 15, 2025

[https://web.archive.org/web/20250715000000\\*/https://www.sellersdorsey.com/what-we-do/](https://web.archive.org/web/20250715000000*/https://www.sellersdorsey.com/what-we-do/)

What We Do Page — September 18, 2025

[https://web.archive.org/web/20250918000000\\*/https://www.sellersdorsey.com/what-we-do/](https://web.archive.org/web/20250918000000*/https://www.sellersdorsey.com/what-we-do/)

What We Do Page — November 18, 2025

[https://web.archive.org/web/20251118000000\\*/https://www.sellersdorsey.com/what-we-do/](https://web.archive.org/web/20251118000000*/https://www.sellersdorsey.com/what-we-do/)

What We Do Page — December 11, 2025

[https://web.archive.org/web/20251211000000\\*/https://www.sellersdorsey.com/what-we-do/](https://web.archive.org/web/20251211000000*/https://www.sellersdorsey.com/what-we-do/)

### II. BHSOAC — Commission Meeting Materials and Public Records

BHSOAC May 22, 2025 Commission Meeting — IPF Discussion

<https://bhsoc.ca.gov/connect/commission-meetings/>

BHSOAC Innovation Partnership Fund — Program Page <https://bhsoc.ca.gov/grants-and-contracts/innovation-partnership-fund/>

BHSOAC IPF RFP Outline Approval — January 22–23, 2026 Meeting

[https://bhsoc.ca.gov/wp-content/uploads/CBH\\_202603\\_Minutes\\_202060122\\_Draft.pdf](https://bhsoc.ca.gov/wp-content/uploads/CBH_202603_Minutes_202060122_Draft.pdf)

BHSOAC IPF Framework Adoption — November 26, 2025

<https://bhsoac.ca.gov/newsroom/commissioners-approve-innovation-partnership-fund-framework/>

BHSOAC Request for Application — IPF-001 <https://bhsoac.ca.gov/connect/grant-funding-opportunities/request-for-proposal-rfp-for-innovation-partnership-fund-ipf-001/>

### III. BCCP® / B2C3A™ Public Record Entries

BHC Public Comment Document — April 10, 2025 <https://dmh.lacounty.gov/wp-content/uploads/2025/05/BHC-Public-Comment-Document-MHSA-Public-Hearing-04-10-2025.pdf>

USPTO Trademark Registration — BCCP® Serial No. 99168607

[https://tsdr.uspto.gov/#caseNumber=99168607&caseType=SERIAL\\_NO&searchType=statusSearch](https://tsdr.uspto.gov/#caseNumber=99168607&caseType=SERIAL_NO&searchType=statusSearch)

### IV. Related Public Records

BOS Transcript — April 15, 2025

[https://file.lacounty.gov/SDSInter/bos/sop/transcripts/1181944\\_041525.pdf](https://file.lacounty.gov/SDSInter/bos/sop/transcripts/1181944_041525.pdf)

California Senate Democrats Hearing — June 28, 2025

<https://www.youtube.com/watch?v=dxmRwOxuCmk>

UCLA/Ballmer Announcement — April 6, 2026 <https://newsroom.ucla.edu/releases/ucla-receives-33-million-to-address-youth-mental-health-crisis>

PPSGC Session — April 16, 2025

[https://lacountymediahost.granicus.com/MediaPlayer.php?clip\\_id=12808](https://lacountymediahost.granicus.com/MediaPlayer.php?clip_id=12808)

### V. Internet Archive

Internet Archive — Wayback Machine <https://web.archive.org/>

*Note: All Wayback Machine URLs with asterisks (\*) in the timestamp position reflect the general capture calendar for that page. Exact timestamp URLs for each specific capture reviewed are preserved separately and may be made available upon written request. All captures were reviewed by the undersigned from publicly accessible archived materials.\**

### VI. BHSOAC May 22, 2025 Meeting Record — Asymmetric Record Handling

Official May 22, 2025 Meeting Materials: [https://bhsoac.ca.gov/wp-content/uploads/BHSOAC\\_Materials\\_05222025\\_ADA\\_2.pdf](https://bhsoac.ca.gov/wp-content/uploads/BHSOAC_Materials_05222025_ADA_2.pdf)

Written Public Comment — separate link — housing retroactively added after June 6, 2025  
omission acknowledgment: [https://bhsoac.ca.gov/wp-content/uploads/2025\\_05\\_Written\\_Public\\_Comment.pdf](https://bhsoac.ca.gov/wp-content/uploads/2025_05_Written_Public_Comment.pdf)