

Dear Sir or Madam:

On an event night at 618 S. Spring Street, the first people in the room are workers. Riggers and stage crew work on and under an aluminum truss. Lighting and video technicians run cable to equipment overhead. Security, bar and floor staff work beneath them. On other days, maintenance workers go above the ceiling, where the chains that carry a video array pass through to the floor above.

I own the building, the former Los Angeles Stock Exchange (opened January 1931), a Historic-Cultural Monument. Its trading floor is the Exchange LA nightclub, operated by my tenant Hawkeye Entertainment and subtenant WERM Investments; Insomniac produces events. On April 16, 2026 I filed federal OSHA online complaint Reference No. 312414 about conditions there and have received no response. Federal OSHA states that "The California State Plan covers all private-sector places of employment within the state" [11]. Please confirm whether No. 312414 was referred to your office.

This letter reports present conditions affecting employees. It is not a lease claim, and I do not ask that any business be closed. I ask for an inspection and an engineering evaluation. Each finding is cited to an engineer's report, a court record, or a dated record, and most of the engineering statements come from the truss designer's own documents.

A. The layers above the workers

1. The ceiling. The original plaster ceiling is about 40 feet above the dance floor [25]. On January 20, 2024, during an event, a plaster ceiling tile fell onto the dance floor. My company later received three notices of claim from Jacoby & Meyers for alleged injuries arising from the January 20-21, 2024 event. On December 18, 2024, Ficcadenti Waggoner and Castle, structural engineers I retained, reported that "the holes that punctured through the tiles have damaged some of the wires that suspend the tile," and that "These tiles with damage to their wire supports present a greater risk of falling to the floor below and require remediation" [3]. A July 26, 2026 walkthrough counted 36 ceiling penetrations: 25 plated, 2 for chain hoists, 4 open over the stage, and 5 through the center light fixture. More than 25 masonite boards are fastened over damaged areas [5]. The permanent ceiling repair described in April 2024 as coming "next" has no application in the public permit record that I have found [7].

2. The net. Below the ceiling hangs what the truss designer calls "a fabric mesh specifically designed to catch debris" [1]. In the pages I have read, the net's design check is a static debris load of 10 pounds per linear foot; I found no drop-impact check [1].

3. The truss. The net is carried by what its designer, EEC (Andrew L. Savage, PE), describes as "a temporary aluminum truss structure for use supporting lighting equipment and a fabric mesh specifically designed to catch debris." EEC's letter states: "The installation duration was considered at a period of 6 weeks up to 1 year as referenced in ANSI E1.21 or ASCE37-14 for loading of temporary structures" [1]. On May 13, 2024 the tenant's consultant wrote to a City inspector: "We have already erected the truss and netting" [4]. That was 864 days ago, more than twice the longest duration its designer considered. Counted from that email, the one-year period ended more than sixteen months ago. Counted from EEC's January 23, 2025 review, it ended in January 2026.

4. How the truss holds itself up sideways. EEC's letter states: "Per industry standard practice the temporary structure was not reviewed for seismic loading however a lateral acceleration of 0.2G has been used in design to check deflections and lateral load path." It describes the attachment: "The connection relies on tightening of a scaffold screwjack to make contact with the existing walls. No screws, nails or otherwise positive engagement is to be made to the building due to its historic nature." And it states that "no review of the existing facility has been included in the analysis" [1]. The truss bears against walls that its own analysis did not review. Ficcadenti separately observed that "the bases of the vertical truss components do not appear to be attached to the floor below, limiting their ability to resist lateral loads" [3].

5. What hangs on the truss and through the ceiling. EEC's January 23, 2025 letter, addressed to *Insomniac*, is titled "Exchange LA Lighting Update." Its rigging schedule lists 38-pound moving-head fixtures and a 165-pound column of five LED panels secured to a truss leg [1]. Separately, Ficcadenti described "a large video display consisting of an array of 72 individual video screen[s] hanging from the fifth floor on chains that pass through the fifth-floor ceiling," reported that those cables and chains are not braced where they pass through the ceiling, and wrote of the anchorage points above: "Each location is engineered to support a stated maximum suspended vertical load of 1,200 pounds. No lateral load bracing is provided at the fifth-floor ceiling" [3]. I have searched City records and have not located an electrical permit covering the truss lighting and screens [7]. I make no claim about how the equipment is wired; I note the search so that your inspectors can ask.

6. Fire protection. On June 8, 2026 the fire-pump vendor could not complete the monthly test because the jockey pump would not start. On June 17 a technician said the issue was outside the vendor's scope and identified no cause. A generator leak was also found [6]. I suggest no cause. I report that the fault was open, and I have no record that it has been resolved.

Each layer rests on, hangs through, or depends on the one before it. On a still day, each alone might be tolerated. The workers described above are beneath all of them.

B. When the ground moves

In an earthquake the layers do not stay separate. They compound: danger on danger on danger. My structural engineers wrote [3]:

"During an earthquake the relative position of the suspended video display and the ceiling will vary significantly causing the cables/chains to impact the edges of the tile. Such an impact will likely cause the tiles to be damaged or dislodged, increasing the likelihood of the tile falling to the floor below. In addition, the video display is currently free to sway due to the lack of lateral bracing below the ceiling. During an earthquake the swaying of the vertical display can likely impact the surrounding improvements, potentially causing damage to the array and/or other building features, as well as injury to the occupants of the entertainment venue."

The truss designer also treated an earthquake as a condition the system must answer to. EEC's operations plan for the debris truss and net states: "IN THE EVENT OF AN EARTHQUAKE OF ANY MAGNITUDE THE EVENT SHALL BE POSTPONED UNTIL SUCH TIME THAT ALL STRUCTURES AND EQUIPMENT MAY BE VISUALLY INSPECTED BY A COMPETENT PERSON ON SITE" [2]. That plan addresses what happens after the shaking. The design itself, by its designer's own words, "was not reviewed for seismic loading" beyond the 0.2G check [1].

Put the layers back together. The ground moves. Seventy-two screens, with no lateral bracing below the ceiling, sway on their chains. The chains strike the edges of tiles, some already hanging on damaged wires. Tiles drop toward a net whose design check, in the pages I have read, is a static load. The net hangs from a temporary truss 864 days after it was reported erected, checked at 0.2G, held sideways by screwjacks pressed against walls its analysis did not review, and carrying its own lights. Beneath all of it are the crew who hung those lights and the staff working the floor.

C. Fire following earthquake

The USGS ShakeOut scenario for a magnitude 7.8 southern San Andreas earthquake estimates "1,600 ignitions of which 1,200 will be too large to be controlled by one fire engine company" [16]. Its fire study found that "about half of all ignitions would be electrical related" [17]. The 1994 Northridge earthquake caused approximately 110 earthquake-related fires [21], and Los Angeles Fire Department data attribute 56 percent of the Northridge ignitions to electrical causes [17]. After the 1995 Kobe earthquake, NIST reported: "When electric power was restored, damaged appliances, wiring, and light fixtures ignited combustibles" [18]. A report for the Seismic Safety Commission states that "Water systems in California have failed in virtually all urban earthquakes in California" [19]. In 1906, fires after the San Francisco earthquake burned for three days and destroyed nearly 500 city blocks [20].

Here, energized lighting and video hang from a temporary truss, and the fire pump had an open, undiagnosed fault when last reported. That fault is not separate from the seismic question. It is the next layer.

D. What history shows

On March 11, 2011, during a graduation ceremony at the Kudan Kaikan hall in Tokyo, the Great East Japan Earthquake brought down the hall's suspended ceiling; two people died and 31 were injured. Prosecutors declined to charge because, at the time, there was no clear safety standard for suspended ceilings [22] [verify translation]. Japan's rule for such ceilings took effect April 1, 2014 [22]. A missing standard ended the case. It did not protect the people underneath.

The closest workplace parallel involved no earthquake. On June 16, 2012, in Toronto, a temporary outdoor stage whose structure was to "suspend more than 27,000 kilograms of equipment in the air" came down before a concert and killed drum technician Scott Johnson, 33; three others were injured. An engineer had signed a field review report calling the stage "structurally sound." The Ontario Ministry of Labour found that "The construction did not follow the design," and the promoter, the engineer and the staging contractor were charged with 13 offences under provincial health and safety law; the charges were later stayed for delay [23]. On August 13, 2011, temporary stage rigging at the Indiana State Fair fell in wind gusts, killing seven people, among them a security guard. Organizers "were not legally required to have the stage inspected because it was a temporary structure," and the Indiana Department of Labor later issued penalties "totaling \$80,800" [24]. In both cases, the people who worked the show were among those beneath the structure.

E. Why now

The USGS states: "Neither the USGS nor any other scientists have ever predicted a major earthquake" [14]. I make no prediction either. The USGS estimates a 60 percent chance of a magnitude 6.7 earthquake in the Los Angeles area within 30 years [14]. Its catalog lists five earthquakes of magnitude 3.0 or larger within 150 km of downtown Los Angeles between July 26 and September 24, 2026, including a magnitude 3.07 about 4 km south-southeast of Compton on September 6 [15]. The same catalog lists 216 seismic events within 100 km of downtown Los Angeles from September 10 to September 24, 2026, about 2.7 times the 2021-2025 average for a 14-day period (about 81) and more than in the same September window of any of those five years. Almost all were too small to feel: nine were magnitude 2.5 or larger, and more than half came from a swarm near Lennox on September 11-12 whose largest event was magnitude 2.65 [15] [verify: re-run the query on the send date]. That predicts nothing; it is a reminder of where this room is. The reason to act is a known long-term hazard over people who work at night beneath suspended equipment.

F. What the court decided, and what it did not

On September 18, 2026 the U.S. Bankruptcy Court (Judge Martin R. Barash) entered findings (Doc 149) and judgment (Doc 150) for the tenant in a lease dispute with my company [8] [9]. The Court stated it was "satisfied that the netting truss structure is freestanding and is not permanently attached to the building," found the netting system "designed to protect patrons, employees, and the Premises from falling debris originating from the historic structure," and held that the truss "did not constitute construction or an unauthorized alteration of the Premises under the Lease" (p.19). It found that "the system was a reasonable and beneficial safety measure that protected persons and property from potential hazards associated with the condition of the building" (p.20) [8].

I do not ask your office to revisit those findings. They decided lease questions about falling debris, not earthquake loads. The words "seismic" and "earthquake" do not appear in the 45-page findings [8]. On June 8, 2026 the Court excluded my four disclosed experts (Spectra Historic Construction, Simpson Gumpertz & Heger, David C. Pecoraro, and Ficcamenti Waggoner and Castle) because their reports had not been served by the scheduling-order deadline. No engineer testified [10].

The tenant's principal, Adi McAbian, testified: "I had engineers create it to make sure that it was seismically safe," and that the jacks are "just stopping it, in case of an earthquake, it doesn't collapse on itself" [10]. The designer's letter states that the temporary structure "was not reviewed for seismic loading," apart from the

0.2G check, and that "no review of the existing facility has been included in the analysis" [1]. The testimony and the letter say different things, and no engineer was examined on the difference. The Court's word "freestanding" and the designer's screwjacks tightened against the walls can both be accurate: the truss is not fastened to the building, yet for sideways support it bears on walls no analysis in the record reviewed. On June 10, I told the Court that "the building is located in the L.A. area, which is an earthquake area," and that the excluded engineers' reports "are related to the public safety" [10].

A lease ruling is not a safety certification. To my knowledge, no seismic engineer, agency or life-safety body has evaluated the combined ceiling, net, truss, lighting and screen system for earthquake loads. The judgment bars interference with the business's operations and declared my permitting theories without merit. I raise no permit theory here, and nothing I ask would interfere with operations. I ask the agency responsible for employee safety to look.

G. Questions under Title 8

IIPP (sec. 3203). Section 3203(a) requires every employer to "establish, implement and maintain an effective Injury and Illness Prevention Program," with inspections "Whenever the employer is made aware of a new or previously unrecognized hazard" [13]. Have the employers at this site treated the earthquake exposure described by the truss designer and by Ficcadenti as such a hazard, and inspected for it?

Emergency Action Plan (sec. 3220). The plan must cover the actions employers and employees must take "to ensure employee safety from fire and other emergencies" [13]. Does it address an earthquake during an event, EEC's requirement to postpone after an earthquake "of any magnitude" until a competent person inspects all structures and equipment, and the exit of workers on the truss or above the ceiling?

Head protection (sec. 3381). Section 3381(a) addresses employees at "risk of receiving head injuries from flying or falling objects" [13]. Has falling-object exposure been assessed for crews working beneath the net, the truss and the video array?

H. Requests

Tell me the status of Reference No. 312414 and whether federal OSHA referred it to you. If it was closed, tell me the basis and treat this letter as a request to reopen it.

Conduct an on-site inspection, with attention to the ceiling suspension over work areas, the unbraced video array and the ceiling penetrations, the truss beyond its stated installation duration and its screwjack bracing, the truss lighting and its power, and the fire pump.

Obtain, or require the employers to obtain, an engineering evaluation of the combined ceiling, net, truss, lighting and screen system under seismic loads, including the walls against which the truss is braced and the net under impact.

Review the employers' Emergency Action Plan and IIPP for earthquake procedures.

I am not asking for any business to be closed. I am asking that the people who work in this room be protected from what the engineers have already written down. I will provide access to all owner-controlled areas of the building for any inspection, and copies of every document cited.

Respectfully,

Michael Chang Owner of Record