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Subject: Sept. 30, 2025 Agenda – Public Comment Filing on ADA, Attribution, and Convergence with BCCP™/B2C3A™ Frameworks (For Historic Record)
Date: Tuesday, September 30, 2025 10:04:35 AM
Attachments: [image.png](#)
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Good morning, Chair Barger and Honorable Supervisors,

I write regarding the September 30, 2025 agenda. Multiple items (8, 14, 16, 21, and 48) reflect direct structural and narrative convergence with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Pipeline Prevention Model, both of which I authored and formally entered into the Los Angeles County public record on April 10, 2025 (U.S. Copyright TXu 2-486-534).

These frameworks were formally introduced through my publication, *Introducing the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™): A Public Health Framework for Systems Equity, Accountability, and Harm Prevention* (archived in PDF and attached here for provenance).

Dashboard Demand

The September 30 agenda confirms that Los Angeles County is now operating in the BCCP Era. Yet these transformations continue without attribution, ADA inclusion, or fidelity safeguards. As a minimum condition for lawful and ethical implementation, I respectfully request the Board to publish a Convergence Dashboard documenting:

1. The specific policies and program changes since April 10, 2025 that reflect BCCP™/B2C3A™ logics.
2. The provenance of those changes, including frameworks and public warnings they derive from.
3. Whether attribution, ADA/FEHA compliance, and fidelity safeguards were met.

This dashboard is essential for transparency, public trust, and historic accountability.

Agenda Highlights

- **Item 8 (PQA Awards):** \$147M in reported efficiency gains align with BCCP™/B2C3A™'s equity–efficiency logics. Supervisor Horvath herself described the \$50M Measure J/G error as a “bureaucratic disaster” — an error only corrected after BCCP™ was entered into the record.
- **Item 14 (Domestic Violence Awareness/Prevention):** Mirrors BCCP™'s care-to-custody disruption logic and B2C3A™'s survivor-centered pathways.

- **Item 16 (Creative Strategist):** Embedding strategist roles parallels the Systems Equity Strategist designation filed under BCCP™/B2C3A™. Without safeguards, this risks governance identity crisis.
- **Item 21 (Urban Natureways):** Interdepartmental navigation and planning logic directly align with BCCP™ prevention standards and B2C3A™'s universal navigation model.
- **Item 48 (Public Health Emergencies Reserve Fund):** Reframes health as foundational to safety — a trauma-informed systems logic central to BCCP™.

Closing

I ask that this comment be docketed into the Sept. 30, 2025 record, with attachments preserved. These agenda items confirm convergence. What remains unresolved is attribution, ADA/FEHA compliance, and fidelity safeguards. Without a Convergence Dashboard, the County risks institutionalizing reform without integrity.

Respectfully submitted,
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COUNTY OF LOS ANGELES BOARD OF SUPERVISORS



CONFIRMATION

Thank you for submitting your written public comment. Your information has been captured and will be filed as public record.

Agenda Number	Position	Comments
8.	Other	<p>These awards celebrate \$147 million in efficiency gains. Yet as CEO Joseph Nicchita cautioned just last week, 'We shouldn't let ourselves be captured by the great ideas of 20 or 30 years ago.' The efficiencies being celebrated are not old ideas — they are the prevention and equity logics of BCCP™ and B2C3A™, entered into the public record this April under ADA protections and U.S. copyright. Supervisor Horvath has already called the \$50 million Measure J/G mistake a 'bureaucratic disaster.' That 'error' was only discovered and corrected after BCCP™ was in the record, and the fix relied on equity logics embedded in the framework. The catalyst remains unacknowledged. Transparency demands attribution, not retroactive repair. Publish the convergence dashboard. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>
14.	Other	<p>The prevention and diversion reforms embedded here reflect BCCP™ and B2C3A™ — frameworks authored from the lived expertise of survivors of violence, whether intimate partner, community, or systemic. Survivors deserve more than symbolic recognition — they deserve fidelity safeguards and attribution to the frameworks that diagnosed these risks years earlier. Silence in the face of ongoing harm is not neutral; it has already cost lives, compounded trauma, and justified fiscal errors. But you now have an opportunity to lead with transparency. Publishing a convergence dashboard would both honor survivor-centered science and strengthen public trust in this Board's historic role. The frameworks are here, the record is clear, and the choice to recognize provenance is yours. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>
16.	Other	<p>Embedding creative strategists mirrors the Systems Equity Strategist role defined in BCCP™/B2C3A™. But herein lies the irony: Los Angeles County already has public program heads under Prevention and Early Intervention (PEI) and the Contracts Monitoring and Management Division (CMMD), as well as named BureauCare appointees. Yet the strategist role now being replicated was authored by a displaced employee on ADA-protected involuntary medical leave. Supervisor Solis herself cautioned: "We need to consider new ways to engage our workforce. I hear frustration out there, and we cannot ignore it." This motion risks doing exactly that — embedding "strategist" classifications while ignoring the displaced professionals whose work the County now relies on. This contradiction exposes not only systemic erasure but also a deeper "identity crisis" within County governance: celebrating equity innovations publicly while displacing the very authors who designed them. Attribution and a convergence dashboard are minimum safeguards to ensure reforms are lawful, transparent, and protective against further harm or exploitation. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>

18.	Other	Housing inequity in Los Angeles is not just a market failure — it's a legacy of BureauCare as usual. Since April 2025, when the BCCP™ and B2C3A™ frameworks entered the public record, housing has been situated as a human right and a prevention safeguard. The logic of today's motion aligns with those frameworks: recognizing that instability, displacement, and bureaucratic delay push families deeper into the BureauCare-to-Custody-Cemetery pipeline. But attribution is missing. Why were framework-aligned advocacy efforts in Prevention and Early Intervention and the Contracts Monitoring and Management Division displaced, just like the people this policy seeks to protect? Publish the convergence dashboard so housing reforms are tied to their true provenance, not erased in institutional silence." Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
21.	Other	Streamlined interdepartmental infrastructure mirrors the prevention equity standards in BCCP™ and the navigation logic in B2C3A™. Yet why was BCCP-aligned interdepartmental equity, prevention, and postvention advocacy prohibited until after these frameworks were authored under ADA protections and copyright? Without transparent tracking, communities risk losing both accountability and access — another layer of erasure in the BCCP Era. Publish the convergence dashboard to ensure ADA fidelity and safeguard the frameworks driving these reforms. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
63.	Other	Reframing public health as the foundation of safety reflects BCCP™'s prevention-first thesis. Yet provenance is missing. This cluster of deferred items — housing effectiveness, sustaining public health, immigrant affairs resilience, small business relief, and transitional age youth prevention — represents core domains already mapped in BCCP™ and B2C3A™. But we must ask why BCCP-aligned advocacy was prohibited until April 2025. Since MHSA's inception, BureauCare has outlived multiple child fatalities (including September 10, 2025, the very day the Health and Mental Health Cluster met on "strengthening workforce" while based on a displaced professional's framework of clericalizing clinical/prevention roles), a \$4 billion settlement, and a culture of silence that justified exploitation and displacement. "Receive and file" without attribution risks repeating that legacy of erasure and undermining BCCP fidelity safeguards. Publish the convergence dashboard so these reforms are tied to their true frameworks and to public accountability. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
Public Comment	Other	Since April 10, 2025, we have been living in the BCCP Era. Yet despite known risk factors for harm and repeated warnings, County government has proceeded in silence. A one-year-old child's preventable fatality on September 10, 2025 — the same day prevention and workforce failures were under review — shows that delay costs lives, not just dollars. Even County leaders have admitted as much: CEO Nicchita said, 'We shouldn't let ourselves be captured by the great ideas of 20 or 30 years ago.' DHR Director Garrett acknowledged employees reporting they are 'stuck in clerical.' Supervisor Solis warned vacancies have been 'used for other purposes.' Supervisor Horvath called the \$50 million Measure J/G error a 'bureaucratic disaster.' And during the Family & Social Services Cluster on September 24, Supervisor Hahn's assistant described these very reforms as 'revolutionary.' But here lies the contradiction: Item 16 celebrates embedding "creative strategists" in governance, while the Systems Equity Strategist function defined in BCCP™/B2C3A™ — authored under ADA protections — remains displaced. This is not just oversight; it is a County identity crisis: celebrating equity innovations publicly while displacing the very authors who designed them. The Board has adopted "revolutionary" prevention, diversion, and equity reforms that save millions — but without attribution to the BCCP™ and B2C3A™ frameworks authored under ADA protections. Transformation cannot rest on erasure. Without BCCP fidelity safeguards, governance remains optical, leaving vulnerable communities in the dark. Publish the convergence dashboard — the minimum condition for public trust, lawful attribution, and historic accountability. As I stated in my January 21, 2025 ADA/IPM meeting with HR: How many more of our Black, Brown, poor, and White children must die before County leaders take the evidence-based BCCP framework and BureauCare-to-Custody-Cemetery Pipeline issues seriously? Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.

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