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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**
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11 OSCAR DE LA TORRE and ELIAS)	Case No.: 21STCV08597
SERNA)	
12)	SUPPLEMENTAL DECLARATION OF
Plaintiffs,)	OSCAR DE LA TORRE IN SUPPORT OF
13)	MOTION FOR SUMMARY JUDGMENT
v.)	
14)	Dept. 15
CITY OF SANTA MONICA and)	
DOES 1 through 10, inclusive)	[Hon. Richard Fruin]
15)	
Defendants.)	
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1 I, Oscar de la Torre, declare as follows:

2 1. I am a plaintiff in the above-captioned case. I am over the age of 18 and
3 have personal knowledge of the facts contained in this declaration. I previously
4 submitted a declaration in support of Plaintiffs’ motion for summary judgment; I offer
5 this supplement only to address the deceptive omission of facts by Defendant
6 concerning my recusal from council decisions concerning the hundreds of child sex
7 abuse cases against Defendant arising out of the sex abuse perpetrated by Eric Uller and
8 other employees of Defendant. If called as a witness, I could and would competently
9 testify as follows:

10 2. Last year, I voluntarily recused myself from council decisions concerning
11 the hundreds of child sex abuse cases against Defendant arising out of the sex abuse
12 perpetrated by Eric Uller and other employees of Defendant – what Defendant
13 euphemistically calls “litigation involving the Police Activities League.” At the
14 insistence of Mayor Sue Himmelrich, I provided some explanation of the reason for my
15 recusal. However, because of the inherent sensitivity of the issue, and to maintain the
16 privacy of the victims of child sex abuse, my explanation for my recusal was
17 intentionally general and somewhat vague. I explained that I had relationships with
18 several of the victims of the child sex abuse that Defendant facilitated, but I refrained
19 from identifying any specific victims, in order to protect their privacy. Now, I feel
20 compelled to elaborate, in order to respond to Defendant’s assertion that my voluntary
21 recusal in the child sex abuse cases somehow means that I can’t participate in council
22 decisions and discussions concerning the Voting Rights Case. I voluntarily recused
23 myself from the child sex abuse cases because at least one of my family members was
24 sexually abused by Eric Uller – the subject of those child sex abuse cases – and at least
25 one of my family members has filed a case seeking monetary damages from Defendant
26 for that sex abuse. That family member, of course, unlike my wife in the Voting Rights
27 Case, has a financial interest in his sex abuse case.

28 3. Defendant’s interim city attorney and city council members knew that at
least one of my family members was a plaintiff in the many child sex abuse cases

1 against Defendant, because they have always been involved in the defense of all of the
2 child sex abuse cases. Yet, Defendant attempts to use my voluntary recusal against me,
3 and force me to identify my family member who was sexually abused by Defendant's
4 employee. This just serves to demonstrate the depths to which Defendant's council
5 majority and city attorney's office will sink to silence me and maintain their entrenched
6 political power.

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8 I declare under penalty of perjury under the laws of the State of California that
9 the foregoing is true and correct.

10 Executed this 1st day of April 2022, at Santa Monica, California.

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12 Oscar de la Torre

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