

JARROD'S LAW

Behavioral Health Oversight & Patient Safety Reform

JarrodsLaw Org Inc. • 501(c)(3) Nonprofit • EIN 46-5728954 • jarrodsLaw.org • WendyJarrodsLaw@Gmail.com

September 24, 2026

California Department of Health Care Services
Licensing and Certification Division
Substance Use Disorder Compliance Division
1500 Capitol Avenue, Sacramento, CA 95814

RE: Formal Complaint — Unlicensed “Housing Plus Services” Operation and Potential Brandon’s Law (SB 434) Marketing Violations at Resolutions Living / Resolutions Therapeutic Services, Santa Monica, CA — Following the Death of Resident Presley Gerber

To Whom It May Concern:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod’s Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to formally request that the Department of Health Care Services (DHCS) open an investigation into the licensure status and operating structure of Resolutions Therapeutic Services and its affiliated residential entity, Resolutions Living, both located at or near 2001 Wilshire Boulevard, Suite 505, Santa Monica, California.

This complaint is prompted by the death of resident Presley Gerber, age 27, on September 20, 2026, reportedly within twelve hours of his arrival at Resolutions Living the previous evening. I want to be clear at the outset that I am not asserting a specific cause of Mr. Gerber’s death; I understand the Santa Monica Police Department is investigating and that the Los Angeles County Medical Examiner has deferred a determination of cause and manner of death pending toxicology results. My concern, and the basis for this complaint, is independent of that pending finding: it is that the regulatory structure surrounding this facility

appears to have allowed a residential “housing plus services” program to operate for an unknown period without the licenses that would normally subject it to health and safety oversight.

Mr. Gerber’s death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. Every day that a facility like this is allowed to operate without a DHCS license and without a DSS license is another day another family faces the same risk his family did.

Basis for Complaint

- Resolutions Therapeutic Services operates as an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD (“Reza Nabavi, PhD, A Psychology Corporation”). To my knowledge, this program holds no DHCS license or SUD certification, despite public-facing marketing that describes addiction treatment services in terms that suggest SUD care is a primary, not incidental, service line.
- The program has, to my knowledge, obtained Joint Commission accreditation. Joint Commission standards commonly defer to state licensing law, meaning accreditation can be granted to a behavioral health program without any independent verification that a DHCS SUD certification exists where one may be required. I ask that DHCS review whether the services actually documented in client records — rather than the diagnostic framing used on intake paperwork — show addiction treatment functioning as a primary or substantial service, which would trigger the SUD certification requirement regardless of how the program has classified itself.

- A related entity, Resolutions Living, appears to provide residential housing connected to the outpatient program — a “housing plus services” arrangement. To my knowledge this residential component holds no DSS Community Care Licensing registration and no DHCS residential AOD license. Under California’s current regulatory scheme, transitional or sober living housing of this kind is not required to be licensed at all, which is precisely the gap this complaint asks DHCS to examine and which I am separately pursuing through pending legislative reform (the ESCAPE Act).
- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763, formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as “Supportive Housing.”
- Reza Nabavi, PhD, A Psychology Corporation (Entity No. 3595852, California) operates from 2001 Wilshire Boulevard, Suite 505, Santa Monica, and lists Dr. Nabavi as its sole officer — Chief Executive Officer, Secretary, and Chief Financial Officer — and sole director, with no additional officers listed. Its stated type of business is recorded simply as “Therapy,” and its agent for service of process is listed as Robert Bianchi of Woodland Hills, California, rather than Dr. Nabavi himself. I note that this corporation’s most recent Statement of Information was filed on September 15, 2026 — five days before Mr. Gerber’s death — and I ask DHCS to determine whether that filing reflects any change in the corporation’s structure, officers, or operations around the time of the incident.

- It is my understanding that Ms. Akbar is Dr. Nabavi's wife and holds the corporate responsibility for the residential housing element of the operation, while Dr. Nabavi holds sole responsibility for the licensed clinical practice. Structured this way, the clinical entity has no institutional officer or board beyond Dr. Nabavi himself, and the housing entity is held by a related party at a separate address — a configuration that, in my professional assessment, keeps the residential component legally and administratively insulated from the licensed practice. I ask DHCS to confirm the relationship between these individuals and entities, and to determine whether the clinical and housing arms are functioning as a single coordinated program — deliberately divided between a professional corporation and a separate LLC — in a manner that allows the residential component to operate entirely outside any licensing framework.
- I have observed this same structural pattern — self-attested Type 2 organizational NPI registration combined with diagnostic coding that designates a mental health condition as primary and a substance use disorder as secondary — used elsewhere in California to avoid DHCS's SUD-specific certification trigger regardless of the treatment actually delivered. I ask DHCS to consider whether this pattern is present here.

Potential Brandon's Law (SB 434) and False Advertising Violations

I also ask DHCS to evaluate the marketing practices described above under Brandon's Law (Senate Bill 434, 2021, codified at Health and Safety Code Section 11831.9), which prohibits an operator of a licensed alcoholism or drug abuse recovery or treatment facility, or a certified alcohol or other drug program, from making a false or misleading statement about the entity's products, goods, or services, or from

maintaining internet content that surreptitiously directs consumers to a business with which they have no contract. Resolutions Therapeutic Services' public-facing marketing, which by my understanding describes addiction treatment services in terms suggesting SUD care functions as a primary offering despite the absence of DHCS SUD certification, raises exactly the concern Brandon's Law was enacted to address.

I recognize a threshold question this raises: Brandon's Law's enforcement provisions are framed around operators that already hold a license or certification, which is precisely this program's alleged gap. I ask DHCS to clarify whether Brandon's Law reaches an operator that markets SUD services it is not certified to provide, and if it does not, I would ask DHCS to treat that as a further gap warranting legislative attention. At an absolute minimum, I would ask that this marketing also be evaluated under Business and Professions Code Section 17500, California's general false advertising statute, which applies to any person, firm, or corporation making untrue or misleading statements about services to the public regardless of licensure status, and is enforceable independently by the Attorney General, district attorneys, and city attorneys. I have separately raised this marketing conduct with the Attorney General's office and the Los Angeles County District Attorney's office for evaluation under that statute.

Requested Action

I respectfully request that DHCS: (1) investigate the licensure and certification status of Resolutions Therapeutic Services and Resolutions Living; (2) determine whether the services provided constitute unlicensed alcohol and other drug (AOD) treatment, and whether the residential component requires DSS Community Care licensure; (3) review the programs' public marketing materials, both current and

archived, against the services actually documented for clients; (4) evaluate whether that marketing violates Brandon's Law (SB 434, Health and Safety Code Section 11831.9) and, at minimum, refer the matter for evaluation under Business and Professions Code Section 17500; and (5) coordinate as appropriate with the Santa Monica Police Department and the Los Angeles County Medical Examiner so that any findings relevant to licensing and oversight are shared across agencies.

This case illustrates, in the starkest possible terms, why "housing plus services" models must be brought within a licensing framework. A young man is dead after less than half a day inside a program that, on the facts available to me, has no DHCS license and no DSS license. Families placing loved ones into care of this kind have no way to know that no state agency has verified the safety, staffing, or clinical practices of the program they are entering. I would welcome the opportunity to share the documentation I have compiled and to answer any questions your office may have.

Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

Wendy McEntyre

Founder & Public Safety Advocate

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September 24, 2026

The Joint Commission
Office of Quality and Patient Safety
One Renaissance Boulevard
Oakbrook Terrace, IL 60181

RE: Formal Complaint Regarding Resolutions Therapeutic Services (Santa Monica, CA) — Accreditation Held Despite No DHCS License, and Potential Brandon's Law (SB 434) Marketing Violations — Filed Following the Death of Resident Presley Gerber

To the Office of Quality and Patient Safety:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint against Resolutions Therapeutic Services, an outpatient behavioral health program operating at 2001 Wilshire Boulevard, Suite 505, Santa Monica, California, under the license of Reza Nabavi, PhD, A Psychology Corporation, regarding the Joint Commission accreditation it holds despite operating, to my knowledge, without a DHCS license or SUD certification.

This complaint is filed following the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living, a residential entity operating in direct connection with this accredited program. I am not asserting a specific cause of Mr. Gerber's death; the Santa Monica Police Department is investigating, and the Los Angeles County Medical Examiner has deferred a determination of cause and manner pending toxicology.

Mr. Gerber's death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. A program that markets addiction treatment services it is not certified to provide should not be able to point to Joint Commission accreditation as a substitute for that certification, and this case is exactly why that gap can no longer go unexamined.

Basis for Complaint

- To my knowledge, Resolutions Therapeutic Services operates as an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD (“Reza Nabavi, PhD, A Psychology Corporation”), holding no DHCS license or SUD certification, despite public-facing marketing that describes addiction treatment services in terms suggesting SUD care is a primary, not incidental, service line.
- The program has, to my knowledge, obtained Joint Commission accreditation. Joint Commission standards commonly defer to state licensing law, meaning accreditation can be granted without independent verification that a required DHCS SUD certification exists. I ask that the services actually documented for clients — rather than the diagnostic framing used on intake paperwork — be reviewed to determine whether addiction treatment functions as a primary or substantial service, which would trigger the SUD certification requirement regardless of how the program has classified itself.
- A related entity, Resolutions Living, provides residential housing connected to the outpatient program — a “housing plus services” arrangement. To my knowledge, this residential component holds no DSS Community Care Licensing registration and no DHCS residential AOD license. Under

California's current regulatory scheme, transitional or sober living housing of this kind is not required to be licensed at all, which is precisely the gap this complaint is meant to expose.

- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763, formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as “Supportive Housing.”
- Reza Nabavi, PhD, A Psychology Corporation (Entity No. 3595852, California) operates from 2001 Wilshire Boulevard, Suite 505, Santa Monica, and lists Dr. Nabavi as its sole officer — Chief Executive Officer, Secretary, and Chief Financial Officer — and sole director, with no additional officers listed. Its stated type of business is recorded simply as “Therapy,” and its agent for service of process is listed as Robert Bianchi of Woodland Hills, California, rather than Dr. Nabavi himself. This corporation's most recent Statement of Information was filed on September 15, 2026 — five days before Mr. Gerber's death.
- It is my understanding that Ms. Akbar is Dr. Nabavi's wife and holds corporate responsibility for the residential housing element of the operation, while Dr. Nabavi holds sole responsibility for the licensed clinical practice — a configuration that, in my professional assessment, keeps the residential component legally and administratively insulated from the licensed practice, deliberately divided between a professional corporation and a separate LLC in a manner that allows the residential component to operate entirely outside any licensing framework.

This case sits squarely inside a licensing loophole I have spent years working to close through the California ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act): California allows facilities that combine housing with clinical or quasi-medical services — today marketed as “recovery residences,” not the sober living homes of the 1970s modeled on Oxford House — to operate without a DHCS or DSS license, so long as residents are said to “self-administer” their medications. Based on more than two decades in this field, that distinction does not hold up under California’s own medication-administration rules, and it leaves people who came in seeking help with one substance routinely placed on a dozen or more additional medications inside a home no state agency has ever inspected or licensed.

Separately, I believe the marketing practices at issue here may also raise concerns under Brandon’s Law (SB 434, Health and Safety Code Section 11831.9), California’s statute against false or misleading marketing by addiction treatment operators, and, at minimum, under the general false advertising provisions of Business and Professions Code Section 17500. I have filed complaints raising that issue with DHCS, the Attorney General’s office, and the Los Angeles County District Attorney’s office directly, and I flag it here for context.

Requested Action

I respectfully request that the Joint Commission: (1) open a formal review of Resolutions Therapeutic Services’ accreditation status in light of the facts above; (2) examine whether its standard practice of deferring to state licensing law creates a verification gap that allows behavioral health programs to hold

accreditation while operating outside required state SUD licensure; and (3) advise me of the process and any timeline for this review.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have hundreds of documented case studies I would welcome the opportunity to share, and I would respectfully request a meeting with your legal counsel to walk through what I have found. I bring more than two decades of experience to this issue, dating back to the late 1990s, and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud. People should not be dying in detox.

Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

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Founder & Public Safety Advocate

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September 24, 2026

The Honorable Nathan J. Hochman
District Attorney, County of Los Angeles
211 West Temple Street
Los Angeles, CA 90012

RE: Formal Complaint Regarding Resolutions Therapeutic Services and Resolutions Living (Santa Monica) — Unlicensed Operation, Corporate Structure, and Potential Brandon's Law (SB 434) / Business and Professions Code § 17500 Violations — Filed Following the Death of Resident Presley Gerber

Dear District Attorney Hochman:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint against Resolutions Therapeutic Services and its affiliated residential entity, Resolutions Living, both connected to 2001 Wilshire Boulevard, Suite 505, and 1014 Berkeley Street, Santa Monica, and to request that your office investigate their licensing status, corporate structure, and marketing practices.

This complaint is filed following the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living. I am not asserting a specific cause of Mr. Gerber's death; the Santa Monica Police Department is investigating and the Los Angeles County Medical Examiner has deferred cause and manner pending toxicology.

Mr. Gerber's death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. A

young man died within half a day of entering a facility with no DHCS license and no DSS license, structured across two related entities in a way that, in my professional assessment, was built to avoid exactly that kind of scrutiny — and that is the exact reason this complaint is being filed with your office now.

Basis for Complaint

- To my knowledge, Resolutions Therapeutic Services operates as an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD (“Reza Nabavi, PhD, A Psychology Corporation”), holding no DHCS license or SUD certification, despite public-facing marketing that describes addiction treatment services in terms suggesting SUD care is a primary, not incidental, service line.
- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763, formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as “Supportive Housing.”
- Reza Nabavi, PhD, A Psychology Corporation (Entity No. 3595852, California) operates from 2001 Wilshire Boulevard, Suite 505, Santa Monica, and lists Dr. Nabavi as its sole officer — Chief Executive Officer, Secretary, and Chief Financial Officer — and sole director, with no additional officers listed. Its stated type of business is recorded simply as “Therapy,” and its agent for service of process is listed as Robert Bianchi of Woodland Hills, California, rather than Dr. Nabavi himself. This corporation’s

most recent Statement of Information was filed on September 15, 2026 — five days before Mr. Gerber's death.

- It is my understanding that Ms. Akbar is Dr. Nabavi's wife and holds corporate responsibility for the residential housing element of the operation, while Dr. Nabavi holds sole responsibility for the licensed clinical practice — a configuration that, in my professional assessment, keeps the residential component legally and administratively insulated from the licensed practice, deliberately divided between a professional corporation and a separate LLC in a manner that allows the residential component to operate entirely outside any licensing framework.
- I have observed this same structural pattern — self-attested Type 2 organizational NPI registration combined with diagnostic coding that designates a mental health condition as primary and a substance use disorder as secondary — used elsewhere in California to avoid DHCS's SUD-specific certification trigger regardless of the treatment actually delivered. I ask that this pattern be considered here as well.
- I ask your office to determine whether this structure — a licensed clinical practice paired with a separate, unlicensed residential LLC controlled by a related party — reflects a deliberate effort to keep the housing and services split across two entities specifically to avoid licensure, and whether it implicates insurance fraud, patient brokering, or other statutes within your office's jurisdiction.

This is not an isolated failure. It is the direct result of a licensing loophole that Jarrod's Law has spent years working to close through the California ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act), which I am currently advancing through the Legislature. California allows facilities

that combine housing with clinical, medical, or quasi-medical services — what the industry now markets as “recovery residences” rather than the sober living homes of the 1970s modeled on Oxford House — to operate without any DHCS or DSS license, so long as residents are said to “self-administer” their medications. Based on more than two decades investigating this industry, that distinction does not hold up under California’s own rules governing medication administration, and DHCS’s reliance on it amounts to non-enforcement of laws already on the books. A person who enters one of these homes to get off a single substance is routinely placed on a dozen or more additional medications, dispensed inside a residence that no state agency has ever inspected, staffed, or licensed. This is precisely the gap the ESCAPE Act is designed to close: housing plus services is not housing alone, and it should require a license.

I have spent more than two decades investigating fraud and patient-safety failures across the California addiction treatment industry, and I have observed this same corporate-splitting pattern used elsewhere to shield an unlicensed residential operation behind a licensed clinical entity.

Potential False Advertising Violations

I also ask that this matter be evaluated under Brandon’s Law (Senate Bill 434, 2021, codified at Health and Safety Code Section 11831.9), which prohibits an operator of a licensed alcoholism or drug abuse recovery or treatment facility, or a certified alcohol or other drug program, from making a false or misleading statement about the entity’s products, goods, or services. Resolutions Therapeutic Services’ public marketing, which by my understanding describes addiction treatment services in terms suggesting SUD care functions as a primary offering despite the absence of DHCS SUD certification, raises exactly

the concern Brandon's Law was enacted to address. Brandon's Law's enforcement provisions are framed around operators that already hold a license or certification, which is precisely this program's alleged gap, and I would ask that this threshold question — whether the law reaches an operator marketing services it is not certified to provide — be resolved rather than allowed to become its own loophole. At an absolute minimum, I ask that this marketing be evaluated under Business and Professions Code Section 17500, California's general false advertising statute, which applies to any person, firm, or corporation making untrue or misleading statements about services to the public regardless of licensure status.

Because Business and Professions Code Section 17500 is enforceable by a district attorney independent of licensure status, I ask that your office evaluate this marketing conduct directly rather than waiting on the licensure determination alone.

Requested Action

I respectfully request that your office: (1) open an investigation into the licensing, corporate structure, and marketing practices of Resolutions Therapeutic Services and Resolutions Living; (2) evaluate whether the entities' structure and conduct implicate insurance fraud, patient brokering, or other statutes within your jurisdiction; (3) evaluate the marketing conduct described above under Brandon's Law and, at minimum, Business and Professions Code Section 17500; and (4) coordinate as appropriate with DHCS, the Attorney General's office, the Santa Monica Police Department, and the Los Angeles County Medical Examiner.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have hundreds of documented case studies I

would welcome the opportunity to share, and I would respectfully request a meeting with your legal counsel to walk through what I have found. I bring more than two decades of experience to this issue, dating back to the late 1990s, and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud. People should not be dying in detox.

Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

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Founder & Public Safety Advocate

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September 24, 2026

The Honorable Rob Bonta
Attorney General of California
California Department of Justice
1300 I Street
Sacramento, CA 95814

RE: Formal Complaint Regarding Resolutions Therapeutic Services and Resolutions Living (Santa Monica) — Statewide Licensing-Avoidance Pattern and Brandon's Law (SB 434) Violations — Filed Following the Death of Resident Presley Gerber, and Request for Support of the California ESCAPE Act

Dear Attorney General Bonta:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint against Resolutions Therapeutic Services and its affiliated residential entity, Resolutions Living, in Santa Monica, and to request that your office investigate both this specific case and the broader licensing-avoidance pattern it represents across the California addiction treatment industry.

This complaint is filed following the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival. I am not asserting a specific cause of death, which remains under investigation by the Santa Monica Police Department and pending toxicology from the Los Angeles County Medical Examiner.

Mr. Gerber's death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. This case is not an isolated incident — it is a pattern I have documented repeatedly over more than two decades of investigation, and Mr. Gerber's death is the exact reason I am asking your office to treat it as a statewide enforcement priority rather than a single facility's failure.

Basis for Complaint — The Pattern

- A licensed clinician establishes a professional corporation to run outpatient clinical services, while a separate LLC — often controlled by a spouse or related party — holds the residential housing component. In the Resolutions matter, Reza Nabavi, PhD, A Psychology Corporation holds the clinical license, while Resolutions Living LLC, whose sole manager/member is, to my understanding, Dr. Nabavi's wife, Maryam Akbar, holds the housing. Neither entity carries the licenses that would apply if the two functions were recognized, together, as "housing plus services."
- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763, formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as "Supportive Housing."
- Reza Nabavi, PhD, A Psychology Corporation (Entity No. 3595852, California) operates from 2001 Wilshire Boulevard, Suite 505, Santa Monica, and lists Dr. Nabavi as its sole officer — Chief Executive Officer, Secretary, and Chief Financial Officer — and sole director, with no additional officers listed. Its

stated type of business is recorded simply as “Therapy,” and its agent for service of process is listed as Robert Bianchi of Woodland Hills, California, rather than Dr. Nabavi himself. This corporation’s most recent Statement of Information was filed on September 15, 2026 — five days before Mr. Gerber’s death.

- The program has, to my knowledge, obtained Joint Commission accreditation. Joint Commission standards commonly defer to state licensing law, meaning accreditation can be granted without independent verification that a required DHCS SUD certification exists. I ask that the services actually documented for clients — rather than the diagnostic framing used on intake paperwork — be reviewed to determine whether addiction treatment functions as a primary or substantial service, which would trigger the SUD certification requirement regardless of how the program has classified itself.

This is not an isolated failure. It is the direct result of a licensing loophole that Jarrod’s Law has spent years working to close through the California ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act), which I am currently advancing through the Legislature. California allows facilities that combine housing with clinical, medical, or quasi-medical services — what the industry now markets as “recovery residences” rather than the sober living homes of the 1970s modeled on Oxford House — to operate without any DHCS or DSS license, so long as residents are said to “self-administer” their medications. Based on more than two decades investigating this industry, that distinction does not hold up under California’s own rules governing medication administration, and DHCS’s reliance on it amounts to non-enforcement of laws already on the books. A person who enters one of these homes to get off a single substance is routinely placed on a dozen or more additional medications, dispensed inside a residence that no state agency has ever inspected, staffed, or licensed. This is precisely the gap the

ESCAPE Act is designed to close: housing plus services is not housing alone, and it should require a license.

I have encountered this same accountability gap directly. After submitting a legislative records request to DHCS for a breakdown of licensed facilities that receive government funding (Medi-Cal/DMC-ODS) versus those operating entirely private-pay, I was informed in writing that DHCS cannot separate its reported total of 2,285 facilities into these two categories, and that producing the information would take up to two years. I have received facility data broken out this way from DHCS before, in Excel format, so I do not believe this reflects an actual technical limitation. A department that cannot say how many of the facilities it oversees take public dollars and how many operate entirely outside that accountability structure cannot meaningfully oversee either group. The same oversight that applies to a facility receiving a single government dollar should apply to a private-pay facility providing identical services — today, it does not.

Potential Brandon's Law (SB 434) and False Advertising Violations

I also ask that this matter be evaluated under Brandon's Law (Senate Bill 434, 2021, codified at Health and Safety Code Section 11831.9), which prohibits an operator of a licensed alcoholism or drug abuse recovery or treatment facility, or a certified alcohol or other drug program, from making a false or misleading statement about the entity's products, goods, or services. Resolutions Therapeutic Services' public marketing, which by my understanding describes addiction treatment services in terms suggesting SUD care functions as a primary offering despite the absence of DHCS SUD certification, raises exactly the concern Brandon's Law was enacted to address. Brandon's Law's enforcement provisions are framed

around operators that already hold a license or certification, which is precisely this program's alleged gap, and I would ask that this threshold question — whether the law reaches an operator marketing services it is not certified to provide — be resolved rather than allowed to become its own loophole. At an absolute minimum, I ask that this marketing be evaluated under Business and Professions Code Section 17500, California's general false advertising statute, which applies to any person, firm, or corporation making untrue or misleading statements about services to the public regardless of licensure status.

Your office enforces Business and Professions Code Section 17500 and the Unfair Competition Law (Section 17200) statewide, independent of any facility's licensure status, and I ask that this marketing conduct be evaluated on that independent basis rather than deferred entirely to the licensing determination.

Requested Action

I ask your office to: (1) investigate Resolutions Therapeutic Services and Resolutions Living under California's consumer protection, unfair competition, and healthcare fraud statutes; (2) investigate the broader corporate-splitting pattern described above as a systemic issue affecting the industry; (3) evaluate the marketing conduct described above under Brandon's Law and Business and Professions Code Section 17500; and (4) support the ESCAPE Act as it moves through the Legislature. I bring more than two decades of investigative work to this issue and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have hundreds of documented case studies I

would welcome the opportunity to share, and I would respectfully request a meeting with your legal counsel to walk through what I have found. I bring more than two decades of experience to this issue, dating back to the late 1990s, and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud. People should not be dying in detox.

Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

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September 24, 2026

Hon. Marqueece Harris-Dawson, President, Los Angeles City Council

Hon. Bob Blumenfield, Chair, Planning and Land Use Management (PLUM) Committee

Hon. Traci Park, Councilwoman, CD 11

Hon. John S. Lee, Councilmember, CD 12

200 North Spring Street

Los Angeles, CA 90012

RE: Formal Complaint Regarding Resolutions Therapeutic Services and Resolutions Living (Santa Monica) — Submitted as Direct Evidence for Council File 25-1484 — Filed Following the Death of Resident Presley Gerber

Dear Council President Harris-Dawson, Chair Blumenfield, Councilwoman Park, and Councilmember Lee:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint regarding Resolutions Therapeutic Services and Resolutions Living in Santa Monica, and to submit the facts of this case as direct evidence for the Council's consideration in connection with Council File 25-1484. While Resolutions operates outside the City of Los Angeles, I am filing this complaint with your offices because the facts bear directly on the policy question CF 25-1484 asks the City to study.

This complaint is filed following the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living. I am not asserting a specific cause of Mr. Gerber's death, which remains under investigation.

Mr. Gerber's death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. A facility can be entirely compliant with spacing, dispersal, and size rules and still deliver unlicensed medication administration and clinical services to residents inside it, because California does not currently require a license for “housing plus services” operations that describe medication use as self-administered — and Mr. Gerber's death is the exact reason spacing and density regulation alone will not prevent the next one. The risk lives inside the home, not only in how many homes cluster on a block.

Basis for Complaint

- To my knowledge, Resolutions Therapeutic Services operates as an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD (“Reza Nabavi, PhD, A Psychology Corporation”), holding no DHCS license or SUD certification, despite public-facing marketing that describes addiction treatment services in terms suggesting SUD care is a primary, not incidental, service line.
- A related entity, Resolutions Living, provides residential housing connected to the outpatient program — a “housing plus services” arrangement. To my knowledge, this residential component holds no DSS Community Care Licensing registration and no DHCS residential AOD license. Under California's current regulatory scheme, transitional or sober living housing of this kind is not required to be licensed at all, which is precisely the gap this complaint is meant to expose.
- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763,

formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as “Supportive Housing.”

- It is my understanding that Ms. Akbar is Dr. Nabavi’s wife and holds corporate responsibility for the residential housing element of the operation, while Dr. Nabavi holds sole responsibility for the licensed clinical practice — a configuration that, in my professional assessment, keeps the residential component legally and administratively insulated from the licensed practice, deliberately divided between a professional corporation and a separate LLC in a manner that allows the residential component to operate entirely outside any licensing framework.

This is not an isolated failure. It is the direct result of a licensing loophole that Jarrod's Law has spent years working to close through the California ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act), which I am currently advancing through the Legislature. California allows facilities that combine housing with clinical, medical, or quasi-medical services — what the industry now markets as “recovery residences” rather than the sober living homes of the 1970s modeled on Oxford House — to operate without any DHCS or DSS license, so long as residents are said to “self-administer” their medications. Based on more than two decades investigating this industry, that distinction does not hold up under California’s own rules governing medication administration, and DHCS’s reliance on it amounts to non-enforcement of laws already on the books. A person who enters one of these homes to get off a single substance is routinely placed on a dozen or more additional medications, dispensed inside a residence that no state agency has ever inspected, staffed, or licensed. This is precisely the gap the

ESCAPE Act is designed to close: housing plus services is not housing alone, and it should require a license.

Separately, I believe the marketing practices at issue here may also raise concerns under Brandon's Law (SB 434, Health and Safety Code Section 11831.9), California's statute against false or misleading marketing by addiction treatment operators, and, at minimum, under the general false advertising provisions of Business and Professions Code Section 17500. I have filed complaints raising that issue with DHCS, the Attorney General's office, and the Los Angeles County District Attorney's office directly, and I flag it here for context.

Requested Action

I commend the Council on its August 11, 2026 vote (12-2-1) on Council File 25-1484, directing the Department of City Planning and the City Attorney to study and report back on options for regulating sober living facility density, including minimum spacing and dispersal standards and facility-size thresholds. I ask that the forthcoming report also address the delivery of unlicensed clinical and quasi-medical services inside these homes, which spacing and density rules alone cannot reach, and that the City coordinate with state licensing reform efforts — including the ESCAPE Act I am advancing at the state level — rather than treat density regulation as a substitute for licensing reform. I ask that this complaint be entered into the record for CF 25-1484 as a case study supporting that broader scope.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have hundreds of documented case studies I would welcome the opportunity to share, and I would respectfully request a meeting with your legal

counsel to walk through what I have found. I bring more than two decades of experience to this issue, dating back to the late 1990s, and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud. People should not be dying in detox.

Thank you for your attention to this matter and for taking up this issue.

Respectfully,

Wendy McEntyre

Wendy McEntyre

Founder & Public Safety Advocate

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Behavioral Health Oversight & Patient Safety Reform

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September 24, 2026

The Honorable Gavin Newsom
Governor of California
State Capitol, Suite 1173
Sacramento, CA 95814

RE: Formal Complaint Regarding Resolutions Therapeutic Services and Resolutions Living (Santa Monica) — Filed Following the Death of Resident Presley Gerber, and Why Housing Plus Services Requires a License Under the California ESCAPE Act

Dear Governor Newsom:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint regarding Resolutions Therapeutic Services and Resolutions Living in Santa Monica, and to implore you to understand something I believe is very simple: housing plus services requires a license.

This complaint is filed following the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living. I am not asserting a specific cause of Mr. Gerber's death, which remains under investigation.

Mr. Gerber's death is not a tragic coincidence separate from the facts described in this complaint — it is the direct, foreseeable consequence of them, and it is the exact reason I am filing this complaint now. That single principle — housing plus services requires a license — is the reason I am introducing the California

ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act), and I am asking for your support.

Basis for Complaint

- To my knowledge, Resolutions Therapeutic Services operates as an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD (“Reza Nabavi, PhD, A Psychology Corporation”), holding no DHCS license or SUD certification, despite public-facing marketing that describes addiction treatment services in terms suggesting SUD care is a primary, not incidental, service line.
- A related entity, Resolutions Living, provides residential housing connected to the outpatient program — a “housing plus services” arrangement. To my knowledge, this residential component holds no DSS Community Care Licensing registration and no DHCS residential AOD license. Under California’s current regulatory scheme, transitional or sober living housing of this kind is not required to be licensed at all, which is precisely the gap this complaint is meant to expose.
- Public California Secretary of State filings confirm a sister-agency ownership structure between the clinical and residential arms of this operation. Resolutions Living LLC (File No. 202119510763, formed August 18, 2021) lists its principal office and its sole manager/member — Maryam Akbar — at 1014 Berkeley Street, Santa Monica, CA 90403, a separate address from the clinical program, with its stated business type recorded as “Supportive Housing.”
- Reza Nabavi, PhD, A Psychology Corporation (Entity No. 3595852, California) operates from 2001 Wilshire Boulevard, Suite 505, Santa Monica, and lists Dr. Nabavi as its sole officer — Chief Executive

Officer, Secretary, and Chief Financial Officer — and sole director, with no additional officers listed. Its stated type of business is recorded simply as “Therapy,” and its agent for service of process is listed as Robert Bianchi of Woodland Hills, California, rather than Dr. Nabavi himself. This corporation’s most recent Statement of Information was filed on September 15, 2026 — five days before Mr. Gerber’s death.

- It is my understanding that Ms. Akbar is Dr. Nabavi’s wife and holds corporate responsibility for the residential housing element of the operation, while Dr. Nabavi holds sole responsibility for the licensed clinical practice — a configuration that, in my professional assessment, keeps the residential component legally and administratively insulated from the licensed practice, deliberately divided between a professional corporation and a separate LLC in a manner that allows the residential component to operate entirely outside any licensing framework.

This is not an isolated failure. It is the direct result of a licensing loophole that Jarrod's Law has spent years working to close through the California ESCAPE Act (Ending Systemic Collusion and Accountability Penalties Evasion Act), which I am currently advancing through the Legislature. California allows facilities that combine housing with clinical, medical, or quasi-medical services — what the industry now markets as “recovery residences” rather than the sober living homes of the 1970s modeled on Oxford House — to operate without any DHCS or DSS license, so long as residents are said to “self-administer” their medications. Based on more than two decades investigating this industry, that distinction does not hold up under California’s own rules governing medication administration, and DHCS’s reliance on it amounts to non-enforcement of laws already on the books. A person who enters one of these homes to get off a single substance is routinely placed on a dozen or more additional medications, dispensed inside a

residence that no state agency has ever inspected, staffed, or licensed. This is precisely the gap the ESCAPE Act is designed to close: housing plus services is not housing alone, and it should require a license.

For some reason, the state currently operates as though allowing a resident to self-administer medication means the facility is not engaged in medication administration at all. That is not true. In my professional judgment, DHCS is not enforcing California's own rules governing medication administration, and the result is that recovery residences — not the sober living homes of the 1970s modeled on Oxford House and popularized by Johns Hopkins research, but modern facilities where clinical services are actively delivered on site — operate with no license, no inspection, and no failsafes. A person comes in trying to get off one drug and is placed on sixteen others, self-administered, inside a home no state agency has ever verified as safe.

I have encountered this same accountability gap directly. After submitting a legislative records request to DHCS for a breakdown of licensed facilities that receive government funding (Medi-Cal/DMC-ODS) versus those operating entirely private-pay, I was informed in writing that DHCS cannot separate its reported total of 2,285 facilities into these two categories, and that producing the information would take up to two years. I have received facility data broken out this way from DHCS before, in Excel format, so I do not believe this reflects an actual technical limitation. A department that cannot say how many of the facilities it oversees take public dollars and how many operate entirely outside that accountability structure cannot meaningfully oversee either group. The same oversight that applies to a facility receiving

a single government dollar should apply to a private-pay facility providing identical services — today, it does not.

How can the Department of Health Care Services oversee facilities when it does not even know the scope of the problem it is meant to oversee? And the deeper issue is that whatever information DHCS does have understates the problem, because the industry itself has rebranded: these are not called sober living homes any longer. They are called recovery residences, and services — including medication administration — are being delivered inside them every day. The same oversight that applies to a facility taking a single government dollar should apply to private-pay facilities providing identical services. It currently does not, and in my professional view that gap contradicts what physician-legislators, including Dr. Richard Pan during his time in the Legislature, have stated publicly about what medication administration actually requires.

I am separately planning to raise this same distinction with the U.S. Department of Health and Human Services and the Centers for Medicare & Medicaid Services, to press for housing plus services to be recognized federally as requiring a license. Once that distinction is made explicit, operators will no longer be able to use the Americans with Disabilities Act and the Fair Housing Act as a shield against basic health and safety licensure — protections those laws were never intended to provide. But California can and should lead on this now, through the ESCAPE Act.

In the past several years, California has advanced important mental health legislation and pilot programs built with both quality of care and safety in mind. That has not been the case for private-pay addiction treatment facilities, and it needs to change.

I raise this against the backdrop of your own signature achievement in this space. Proposition 1, which you championed and which narrowly passed in March 2024, restructured the old Mental Health Services Act into the Behavioral Health Services Act and, beginning this year, requires counties to submit detailed three-year Integrated Plans to DHCS, imposes performance-based contracting on publicly funded behavioral health providers starting July 2026, and requires the State Auditor to report to you and the Legislature on how BHSA dollars are implemented and tracked. That is exactly the kind of accountability infrastructure I am asking you to extend to private-pay housing plus services operators like Resolutions Therapeutic Services and Resolutions Living, which today answer to none of it. Prop 1 proved California is willing to hold publicly funded behavioral health providers to integrated planning and outcome tracking; the ESCAPE Act simply asks that private-pay operators providing the identical services be held to the same baseline — a license.

I would also ask you to look at whether Brandon's Law (SB 434, Health and Safety Code Section 11831.9), which you and the Legislature enacted to stop false and misleading marketing by addiction treatment operators, actually reaches an operator that is marketing services it holds no license or certification to provide in the first place. If it does not, that is itself another version of the same loophole, and I would ask, at an absolute minimum, that Business and Professions Code Section 17500 — California's general false advertising statute, which applies regardless of licensure — be used to close that gap until the ESCAPE Act does so more directly.

Requested Action

I ask that you direct DHCS to formally investigate Resolutions Therapeutic Services and Resolutions Living, and that you support the ESCAPE Act as it moves through the Legislature.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have hundreds of documented case studies I would welcome the opportunity to share, and I would respectfully request a meeting with your legal counsel to walk through what I have found. I bring more than two decades of experience to this issue, dating back to the late 1990s, and currently serve on the Orange County Sober Living Task Force and as a member of the National Coalition Against Insurance Fraud. People should not be dying in detox.

I would deeply appreciate the opportunity to meet with your legal counsel personally to walk through what I have encountered over more than two decades in this field — a journey that began in the late 1990s — and that I believe you and your office should know about. Understanding how this keeps happening is the only way to make sure it stops happening.

Thank you for your attention to this matter and for your consideration.

Respectfully,

Wendy McEntyre

Wendy McEntyre

Founder & Public Safety Advocate

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September 26, 2026

Santa Monica City Council council.mailbox@santamonica.gov

1685 Main Street, Santa Monica, CA 90401

RE: Formal Complaint Regarding Resolutions Therapeutic Services and Resolutions Living — Local Zoning, Business License, and Municipal Code Enforcement — Filed Following the Death of Resident Presley Gerber

Dear Members of the Santa Monica City Council:

I am writing in my capacity as Founder and Public Safety Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization focused on behavioral health oversight and patient safety reform, to file a formal complaint regarding two affiliated Santa Monica operations — Resolutions Therapeutic Services (2001 Wilshire Boulevard, Suite 505) and Resolutions Living (1014 Berkeley Street) — and to ask the Council to examine this matter through the City's own zoning, business-license, and municipal-code enforcement authority, in addition to the state and federal

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complaints I have already filed with DHCS, The Joint Commission, the Los Angeles County District Attorney, the California Attorney General, and Governor Newsom.

This complaint follows the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living. I am not asserting a specific cause of death, which remains under investigation by the Santa Monica Police Department, whose responsiveness on this matter I want to acknowledge and thank.

As detailed in the complaints already on file with state and federal authorities, Resolutions Therapeutic Services operates an outpatient PHP/IOP/OP behavioral health program under the individual professional license of Reza Nabavi, PhD, with no DHCS license or SUD certification, while a related entity, Resolutions Living LLC — registered to a separate address and a separate, related-party manager — provides residential housing in direct connection with that program. This is precisely the "housing plus services" structure that falls outside California's

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current state licensing framework, and it is a structure the City has independent authority to examine through its own business-license and zoning enforcement process, regardless of the outcome of any state licensing determination.

I ask the Council to: (1) confirm whether Resolutions Living and Resolutions Therapeutic Services hold current, valid Santa Monica business licenses, and whether those licenses accurately describe the services provided at each address; (2) direct the appropriate department to review whether the residential use at 1014 Berkeley Street complies with the zoning classification under which it operates, given the clinical coordination between the two addresses; (3) coordinate with DHCS, the Attorney General's office, and the Los Angeles County District Attorney so that any local findings are shared across agencies rather than reviewed in isolation; and (4) consider this case, alongside the Los Angeles City Council's ongoing study under Council File 25-1484, as evidence that municipal oversight of recovery

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residences must extend to the services actually delivered inside them, not only to facility siting and density.

Please understand that the difference between life and death, in this field, is often nothing more than someone in a position of authority choosing to take action. I have more than two decades of experience in this issue, dating back to the late 1990s, and I would welcome the opportunity to share the documentation I have compiled with the City Attorney's office and to answer any questions the Council may have.

Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

Wendy McEntyre

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September 26, 2026

**Santa Monica City Attorney's Office
Attorney.Mailbox@santamonica.gov 1685 Main Street, Room
310, Santa Monica, CA 90401**

**RE: Formal Complaint Regarding Resolutions Therapeutic
Services and Resolutions Living — Requested Municipal
Enforcement Review and Coordination with Pending State and
Federal Complaints — Filed Following the Death of Resident
Presley Gerber**

To the Office of the City Attorney:

**I am writing in my capacity as Founder and Public Safety
Advocate of Jarrod's Law, a 501(c)(3) nonprofit organization
focused on behavioral health oversight and patient safety
reform, to file a formal complaint regarding Resolutions
Therapeutic Services (2001 Wilshire Boulevard, Suite 505, Santa
Monica) and Resolutions Living (1014 Berkeley Street, Santa
Monica), and to request that your office review the marketing**

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practices and corporate structure of these two affiliated entities under Business and Professions Code §17500 and, as applicable, the Unfair Competition Law (§17200), both of which your office can enforce independent of any state licensing determination.

This complaint follows the death of resident Presley Gerber, age 27, on September 20, 2026, within approximately twelve hours of his arrival at Resolutions Living. I am not asserting a specific cause of death, which remains under investigation.

As set out more fully in the complaints I have filed with DHCS, The Joint Commission, the Los Angeles County District Attorney, and the California Attorney General — copies of which I am enclosing for your office's convenience — Resolutions Therapeutic Services markets addiction treatment services in terms suggesting substance use disorder care functions as a primary offering, despite holding no DHCS SUD certification, while a related residential entity, Resolutions Living LLC, operates under a separate, related-party corporate structure at a different address. I ask your office to evaluate whether this

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marketing, and the corporate structure that supports it, violates §17500's prohibition on untrue or misleading statements to the public regarding services, independent of the DHCS licensing question.

I respectfully request that your office: (1) review the public-facing marketing materials of both entities, current and archived, against the services actually documented for clients; (2) evaluate the corporate-splitting structure described above for potential unfair competition or consumer-protection exposure under §17200; and (3) coordinate with the California Attorney General's office and the Los Angeles County District Attorney, both of which have received parallel complaints on this matter, so that any local findings inform the broader state investigation rather than proceeding in isolation.

I have hundreds of documented case studies from more than two decades of work in this field that I would welcome the opportunity to share with your office, and I would respectfully request a meeting to walk through what I have found.

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Thank you for your attention to this matter.

Respectfully,

Wendy McEntyre

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