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OFFICE OF THE CITY ATTORNEY

MICHAEL N. FEUER
CITY ATTORNEY

April 3rd, 2017

Via certified United States mail

Ms. Michelle Peacock
Vice President and Head of Government Relations
Turo
667 Mission Street, 4th Floor
San Francisco, CA 94105

RE: Cease and Desist Turo Operations and Reference to Turo Passenger/Customer Access at LAX

Dear Michelle Peacock:

Pursuant to Section 171.02(b) of the Los Angeles Administrative Code. “[n]o person shall engage in any business or commercial activity of any kind whatsoever on the Airport without first having applied for and obtained the appropriate license, lease or permit therefor.”

The type of business your company operates falls within the regulatory framework governed by Los Angeles World Airport’s (LAWA) rental car/transportation service requirements, which requires a business who wishes to operate inside the Airport, to bid for a concession agreement (the Request For Proposal (RFP) process has already closed for this). Absent a concession agreement, rental car companies (which include peer to peer, traditional rental car companies, rental delivery services and any other permutation of a rental car business), can only operate outside of Los Angeles International Airport (“LAX”) at the cell phone waiting lot located next to Economy Parking Lot C on 96th Street.

Your company has been operating a business inside LAX without an agreement with LAWA. Additionally, you were informed, in a letter from LAWA dated January 30, 2017, that LAX Ground Transportation Rules and Regulations include peer to peer car rental businesses as part of the definition of a Rental Car Company as it relates to operations on LAX property (see Exhibit A). Regardless of what you characterize your business, no business is allowed to operate at LAX without the necessary license, lease, contract, and/or permit, and pursuant to the operation of Turo on LAX property the requirement would be a concession agreement.

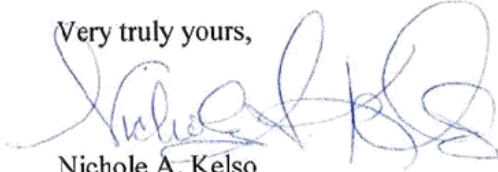
Ms. Michelle Peacock
Page 2
April 3, 2017

Not only does Turo advertise that it does business at LAX (see Exhibit B), Turo in fact does business at LAX by either directly accessing its passengers in the Central Terminal Area ("CTA"), or using courtesy shuttle services from nearby hotels, and/or using independent contractors, such as a black car service, to access its passengers in the CTA. To reiterate, doing business at LAX without a proper agreement with LAWA is a violation of Section 171.02 (b) as well as LAX's Ground Transportation Rules and Regulations.

This letter serves as notice to Turo, to cease and desist its operations inside LAX. Turo cannot access its customers in the CTA, either directly (by an employee of Turo) or indirectly (through an independent contractor who has a contract with LAWA. Note that it would be a violation of independent contractor's agreement with LAWA to provide passenger pick-up or drop-off service to Turo) as Turo does not have a concession agreement to access passengers inside the CTA. If Turo continues to advertise and do business inside LAX, our office will take appropriate legal action to prevent further activity by Turo inside LAX.


Should you have any questions, you may reach me at nkelso@lawa.org and at 424-646-5010.
Thank you for your prompt attention to this matter.

Very truly yours,



Nichole A. Kelso
Deputy City Attorney
Los Angeles City Attorney's Office-Department of Airports

Enclosures

cc:  Debbie Bowers, Deputy Executive Director, Commercial Development Group LAWA
Marisa Katnich, Commercial Development Group, LAWA
Andre Haddad, Chief Executive Officer, Turo