

MINUTES OF THE ADJOURNED MEETING OF THE
BOARD OF DIRECTORS OF THE
VISTA IRRIGATION DISTRICT

July 16, 2014

An Adjourned Meeting of the Board of Directors of Vista Irrigation District was held on Wednesday, July 16, 2014, at the offices of the District, 1391 Engineer Street, Vista, California.

1. CALL TO ORDER

President Dorey called the meeting to order at 8:30 a.m.

2. ROLL CALL

Directors present: Miller, Vásquez, Dorey, Franklin, and MacKenzie.

Directors absent: None.

Staff present: Eldon Boone, Assistant General Manager; Don Smith, Director of Water Resources; Brian Smith, Director of Engineering; Brett Hodgkiss, Administrative Services Manager; Marlene Kelleher, Finance Manager; and Marian Schmidt, Administrative Assistant. General Counsel Joel Kuperberg was also present.

Other attendees: None.

3. PLEDGE OF ALLEGIANCE

Director Miller led the pledge of allegiance.

4. APPROVAL OF AGENDA

14-07-61	<i>Upon motion by Director MacKenzie, seconded by Director Miller and unanimously carried (5 ayes: Miller, Vásquez, Franklin, MacKenzie, and Dorey), the Board of Directors approved the agenda as presented.</i>
----------	---

5. PUBLIC COMMENT TIME

No public comments were presented on items not appearing on the agenda.

6. ETHICS TRAINING

See staff report attached hereto.

General Counsel Joel D. Kuperberg, from Rutan & Tucker, LLP presented a two hour training session in ethics pursuant to Government Code sections 53234 to 53235.2, and a handout was distributed (attached hereto as Exhibit A).

A brief break was taken from 10:35 a.m. to 10:42 a.m. Upon return from break, Al Ducusin, and Angela Morrow were present in the audience.

7. CONSENT CALENDAR

14-07-62 *Upon motion by Director Miller, seconded by Director MacKenzie and unanimously carried (5 ayes: Miller, Vásquez, Franklin, MacKenzie, and Dorey), the Board of Directors approved the Consent Calendar, including Resolution No. 14-17 approving disbursements.*

Director Vásquez requested clarification on Item D, page 3, check #47832 payable to National Meter & Automation, Inc. in the amount of \$18,280.08. He questioned if the amount is for one meter. Mr. Boone responded that the amount is for multiple meters and the quantities were not noted on the report because the report was produced from the new software system and it failed to be on the report, but in the future the quantities will be shown on the report. Mr. Brett Hodgkiss stated that a total of 144 meters were purchased.

A. Acceptance of Water System

See staff report attached hereto. Staff recommended and the Board accepted the water system for a 55-unit detached condominium complex known as Tesoro, owned by Vista 55, L.L.C., consisting of approximately 6.34 gross acres located at Cobalt Drive, Steelhead Way and Titanium Place, Vista (WOI-3020; LN 2002-012A, PC 02-062; APN 164-081-05; DIV NO 2).

B. Quitclaim of Easements and Assignment of Water Rights

See staff report attached hereto. Staff recommended and the Board approved Quitclaim No. 659 quitclaiming a portion of Blanket Easement No. D47, Reserved Easement No. D26, and Assignment of Water Rights over an industrial parcel consisting of approximately 17.17 gross acres owned by Moxie Pacific Palomar L.L.C., and an undeveloped parcel consisting of approximately 1.26 gross acres owned by the City of San Marcos, located near the boundaries of Poinsettia Avenue and Business Park Drive at the North side of San Marcos Boulevard (APN's 221-661-23 and 221-661-18; LN 2013-033; CF 500-362; LAFCO REF NO RO13-46; DIV NO 5).

C. Minutes of Board of Directors meeting on July 2, 2014

The minutes of July 2, 2014 were approved as presented.

D. Resolution ratifying check disbursements

RESOLUTION NO. 14-17

BE IT RESOLVED, that the Board of Directors of Vista Irrigation District does hereby approve checks numbered 47799 through 47892 drawn on Union Bank totaling \$469,173.16.

FURTHER RESOLVED that the Board of Directors does hereby authorize the execution of the checks by the appropriate officers of the District.

PASSED AND ADOPTED by the following roll call vote of the Board of Directors of Vista Irrigation District this 16th day of July 2014.

- AYES: Directors Miller, Vásquez, Franklin, MacKenzie, and Dorey**
- NOES: None**
- ABSTAIN: None**
- ABSENT: None**

8. MATTERS PERTAINING TO THE ACTIVITIES OF THE SAN DIEGO COUNTY WATER AUTHORITY

See staff report attached hereto.

Director Miller reported that there was no Special meeting held last week. Director Miller reported that he met with the San Diego County Water Authority Energy and Operations Committee regarding the San Vicente Reservoir hydropower project. He reported that they are in the process of renewing their FERC license so they can move forward with the pump storage proposal analysis. President Dorey inquired if the Lake Hodges FERC license is separate from San Vicente. Mr. Miller confirmed yes, and clarified that Lake Hodges is a different type of facility. He explained that the facility at the San Vicente Reservoir is a generating plant where the San Diego County Water Authority (SDCWA) will be paid for producing power, whereas Lake Hodges is a standby availability plant in which the SDCWA will be paid for the availability of power if it's needed.

Mr. Boone reported on Director MacKenzie's two requests she had at the July 2, 2014 Board of Directors meeting. She inquired more information on the SDCWA's insurance, and the San Vicente Reservoir dam raise coring contract.

Mr. Boone reported that the SDCWA's contract with the Special District Risk Management Authority (SDRMA) expired on June 30, 2014 and they entered into a contract with a new carrier through their own broker for new property and liability insurance. Mr. Boone referred to their staff report that the new policies produce a premium savings, but the report does not clarify whether it is the same amount of coverage. He further noted that there was no one at the General Manager's meeting that had that knowledge, so he wasn't able to obtain further answers on this topic. Mr. Boone also reported that the SDCWA has entered into a contract for just under \$2M for the coring on the San Vicente Reservoir to drill and transport the cores, not to do the testing. The testing of the cores is in a separate contract with Black & Veatch.

Director Miller informed the Board that there will be another desal tour on September 30th. He also reported that the SDCWA added a line item on the budget for the hydropower testing at San Vicente Reservoir, and there will be a vote next month on moving forward with the studies for the hydropower. Mr. Miller further explained that the hydropower is a billion dollar electrical plant if it actually goes forward.

Mr. Miller further summarized that the SDCWA approved the contract for the coring, approved the Notice of Completion for the contractor, and settled the Lake Hodges lawsuit in the Authority's favor.

President Dorey voiced to the Board regarding a couple of phone calls he received that there is confusion with the public on how the press and the State are focusing on the drought situation. He suggested that the SDCWA should be more vocal with the public.

Director Miller further stated that the reason the water use has increased is due to the warm weather the county had in the Spring. He reported that the SDCWA tracks water usage and receives a monthly report on water use. He further noted that the county normally experiences rainfall in the months of March and April which results in less water usage.

Mr. Boone commented that there is a comparison being made at State level, last year versus this year, which shows the water usage is up 4.5% and there was concern noted at the SDCWA's General Manager's meeting. Mr. Boone further stated that there has been an increase since the Governor asked for a voluntary cut-back, but made note that the increase is due to weather and not due to behavior.

Director Miller acknowledged all the concerns voiced by the Board members, and will make mention to the SDCWA.

9. REPORTS ON MEETINGS AND EVENTS ATTENDED BY DIRECTORS, AND AUTHORIZATION FOR DIRECTOR ATTENDANCE AT UPCOMING MEETINGS AND EVENTS

See staff report attached hereto.

President Dorey and Director Vásquez attended the Council of Water Utilities (COWU) meeting. Director Vásquez reported that the presentation was on coaching, mentoring and succession planning. He informed the Board that there will be no Council of Water Utilities meeting for the month of August.

10. ITEMS FOR FUTURE AGENDAS AND/OR PRESS RELEASES

See staff report attached hereto.

None were presented.

11. COMMENTS BY DIRECTORS

Director Vásquez reported on newspaper articles he read about water conservation and news ranging from the work being done on the New River in the Calexico/Brawley area to items with the ongoing drought, and that water use continues to rise in the county. He also made note that some of the public are disregarding the stage the county is in for conservation and has noticed that some are still watering during the middle of the day. He further stated that for as much stress as there is on conservation, it seems to be a never ending battle.

Director Vásquez mentioned an article he read "A Smarter Home for a Fine Eyed Planet" in the SDCWA's Weekly Release. It was published by a Spanish author who stresses water conservation, planting on the roof, skylights instead of windows, and aquatic plants filtering pools.

12. COMMENTS BY GENERAL COUNSEL

Mr. Kuperberg informed the Board that the State Board took an action on water conservation yesterday which is processing at the staff level and he will report back to the Board for a formal action.

13. COMMENTS BY GENERAL MANAGER

Mr. Boone informed the Board that that the water level at Lake Henshaw is eight percent full. Water releases are back down to minimal after the District had higher releases to accommodate the La Jolla Indian Campground's need for water in the river during the Independence Day holiday period.

Mr. Boone also reported that the District is releasing a Request for Proposal for engineering design and environmental services for the AB line and the Meyers siphon.

Mr. Boone reported that the State Water Resources Control Board approved emergency drought regulations. The State will submit it to the Office of Administrative Law for adoption. Mr. Boone informed the Board that the SDCWA will be considering going to a Level 2 Drought Alert Condition at their next meeting and staff will further report at the August 6th Board of Directors meeting as to our recommendation of further drought-related actions.

Brett Hodgkiss and Marlene Kelleher left the meeting at this time. Still present were Don Smith and Brian Smith.

14. CLOSED SESSION FOR CONFERENCE WITH LEGAL COUNSEL


President Dorey adjourned the meeting to closed session at 11:15 a.m. for a conference with legal counsel per Paragraph (1) of subdivision (d) of Government Code section 54956.9 to discuss the following pending litigation:

- A. Philip Omdahl vs. Vista Irrigation District (Case No. 37-2013-00045757-CU-BC-NC)
- B. San Luis Rey Indian Water Rights Litigation (Settlement)
- C. Quantification Settlement Agreement (QSA)

The meeting reconvened in open session at 11:25 a.m. President Dorey declared that no reportable action had been taken.


15. ADJOURNMENT

There being no further business to come before the Board, at 11:26 a.m., President Dorey adjourned the meeting.



Paul E. Dorey, President

ATTEST:



Marian Schmidt, Assistant Board Secretary
Board of Directors
VISTA IRRIGATION DISTRICT



STAFF REPORT

Agenda Item: 6

Board Meeting Date: July 16, 2014
Prepared By: Marian Schmidt
Approved By: Roy Coox

SUBJECT: ETHICS TRAINING

SUMMARY: Vista Irrigation District General Counsel will conduct a two-hour training session in ethics pursuant to Government Code sections 53234 to 53235.2.



STAFF REPORT

Agenda Item: 7.A

Board Meeting Date: July 16, 2014
Prepared By: Al Ducusin
Reviewed By: Brian Smith
Approved: Roy Coox

SUBJECT: ACCEPTANCE OF WATER SYSTEM

RECOMMENDATION: That the Board accept this water system for a 55-unit detached condominium complex known as Tesoro, owned by Vista 55, L.L.C., consisting of approximately 6.34 gross acres located at Cobalt Drive, Steelhead Way and Titanium Place, Vista (WOI-3020; LN 2002-012A; PC 02-062; APN 164-081-05; DIV NO 2).

PRIOR BOARD ACTION:

03/15/06 Approved Waterline Project and Accepted Grant of Right of Way (V98) via parcel map.
10/04/06 Accepted Grant of Right of Way (G53).

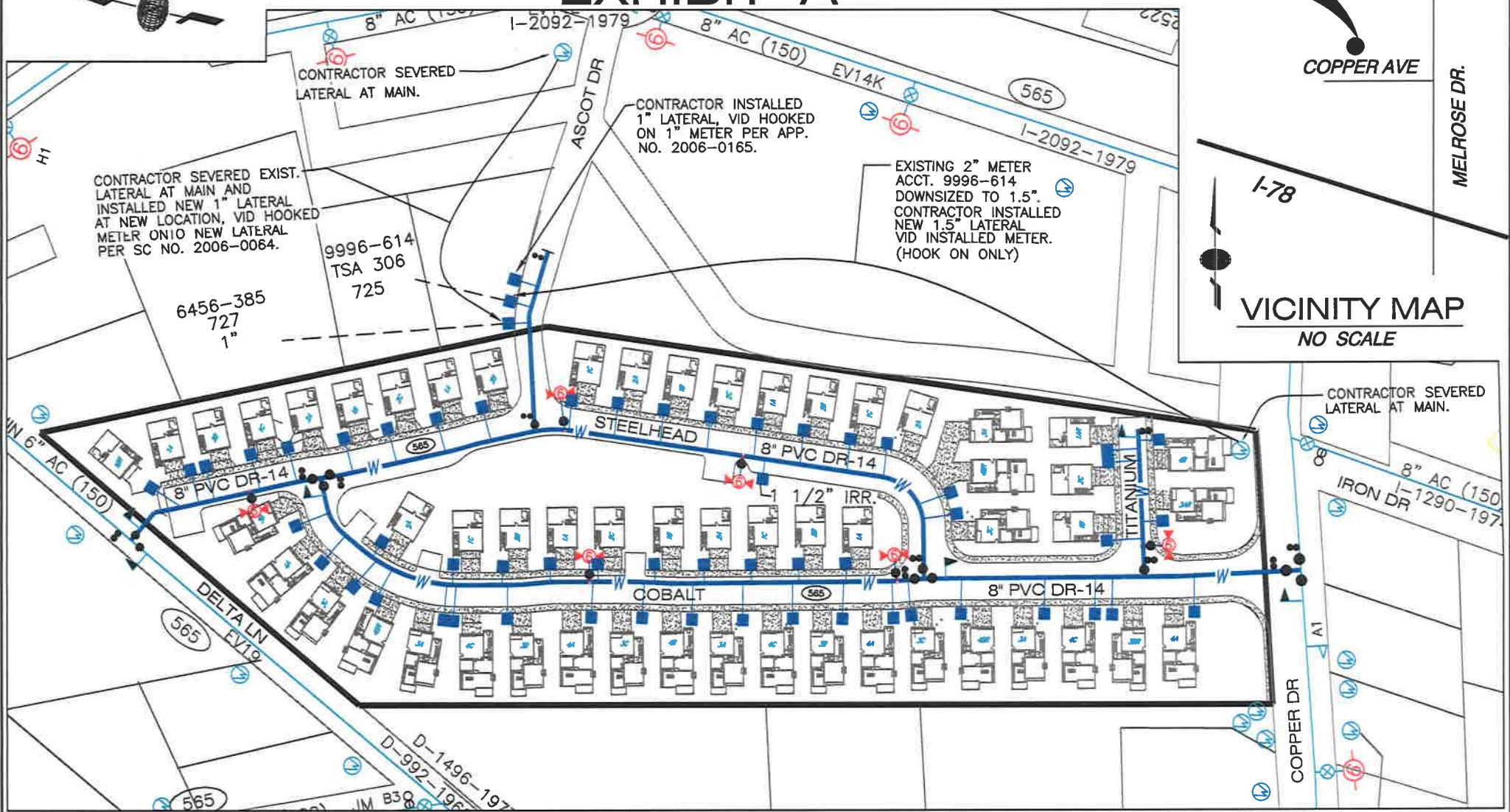
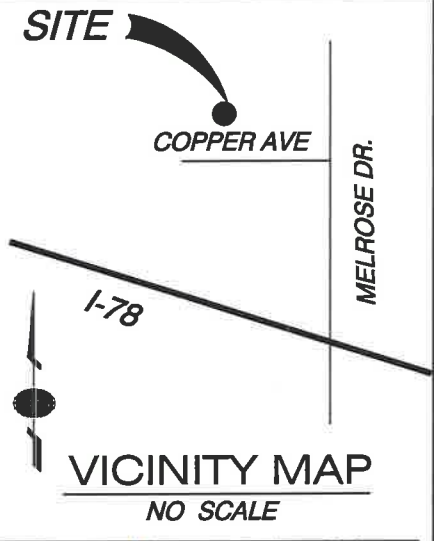
FISCAL IMPACT: None.

SUMMARY: The water system is ready for acceptance by the Board which will allow the Notice of Acceptance to be filed with the County Recorder.

DETAILED REPORT: All the work required by the construction contract has been completed. Under District inspection, the developer's contractor installed approximately 1,907 feet of 8" PVC pipe, 56 1 1/2" service laterals with 55 3/4" domestic meters and one 1 1/2" irrigation meter, and six 6" standard fire hydrants.

ATTACHMENTS: See attached map.

EXHIBIT "A"



LEGEND

SYMBOL:	DESCRIPTION:
	NEW 8" PVC DR 14 WATER MAIN
	EXIST. WATER MAIN
	EXIST. WATER METER
	NEW WATER METER
	EXIST. FIRE HYDRANT
	PROPOSED FIRE HYDRANT

ENGINEER:
EXCEL Engineering
 440 State Place
 Escondido, CA. 92029
 Contact: Robert Dentino
 Ph: (760) 745-8118

OWNER:
Vista 55, LLC.
 P.O. Box 9296
 Rancho Santa Fe, CA 92067
 Contact: Earl W. Sterrett

VISTA IRRIGATION DISTRICT		
TESORO		
55- UNIT CONDOMINIUM COMPLEX		
APN	164-081-05	T.B. 1088-2A
SCALE	1"=100'	L.N. 2002-012
APPD. BY	AV	DATE 7/3/14 W.O.
DRAWN BY	J.V.	DATE 6/16/05
SHEET	1 OF 1	MAP D14
REVISED	M.S. 6/20/14	
PATH	Z:ENGINEERING\JAY\LN2002-012	



STAFF REPORT

Agenda Item: 7.B

Board Meeting Date: July 16, 2014
Prepared By: Al Ducusin
Reviewed By: Brian Smith
Approved: Roy Coox

SUBJECT: QUITCLAIM OF EASEMENTS AND ASSIGNMENT OF WATER RIGHTS

RECOMMENDATION: That the Board approve Quitclaim No. 659 quitclaiming a portion of Blanket Easement No. D47, Reserved Easement No. D26, and Assignment of Water Rights over an industrial parcel consisting of approximately 17.17 gross acres owned by Moxie Pacific Palomar, L.L.C., and an undeveloped parcel consisting of approximately 1.26 gross acres owned by the City of San Marcos, located near the boundaries of Poinsettia Avenue and Business Park Drive at the North side of San Marcos Boulevard (APN's 221-661-23 and 221-661-18; LN 2013-033; CF 500-362; LAFCO REF NO RO13-46; DIV NO 5).

PRIOR BOARD ACTION:

11/20/13 Board received informational item.
12/18/13 Set Terms and Conditions for Detachment.

FISCAL IMPACT: None.

SUMMARY: The owner, Ted Weeks, a managing member of Moxie Pacific Palomar, L.L.C., has requested that Blanket Easement No. D47 and Reserved Easement No. D26 be quitclaimed from his industrial parcel located on San Marcos Boulevard.

DETAILED REPORT: The owner has proposed to subdivide his existing industrial parcel (APN 221-661-23) into five parcels and is in the process of reorganization with LAFCO involving detachment from VID and annexation to VWD. As part of this reorganization, referenced as Vista Business Park Reorganization, LAFCO has also included an additional triangular portion totaling 4.32 acres consisting of an adjacent roadway on San Marcos Boulevard and an undeveloped parcel (APN 221-661-18) to create a more logical district boundary between VID and VWD.

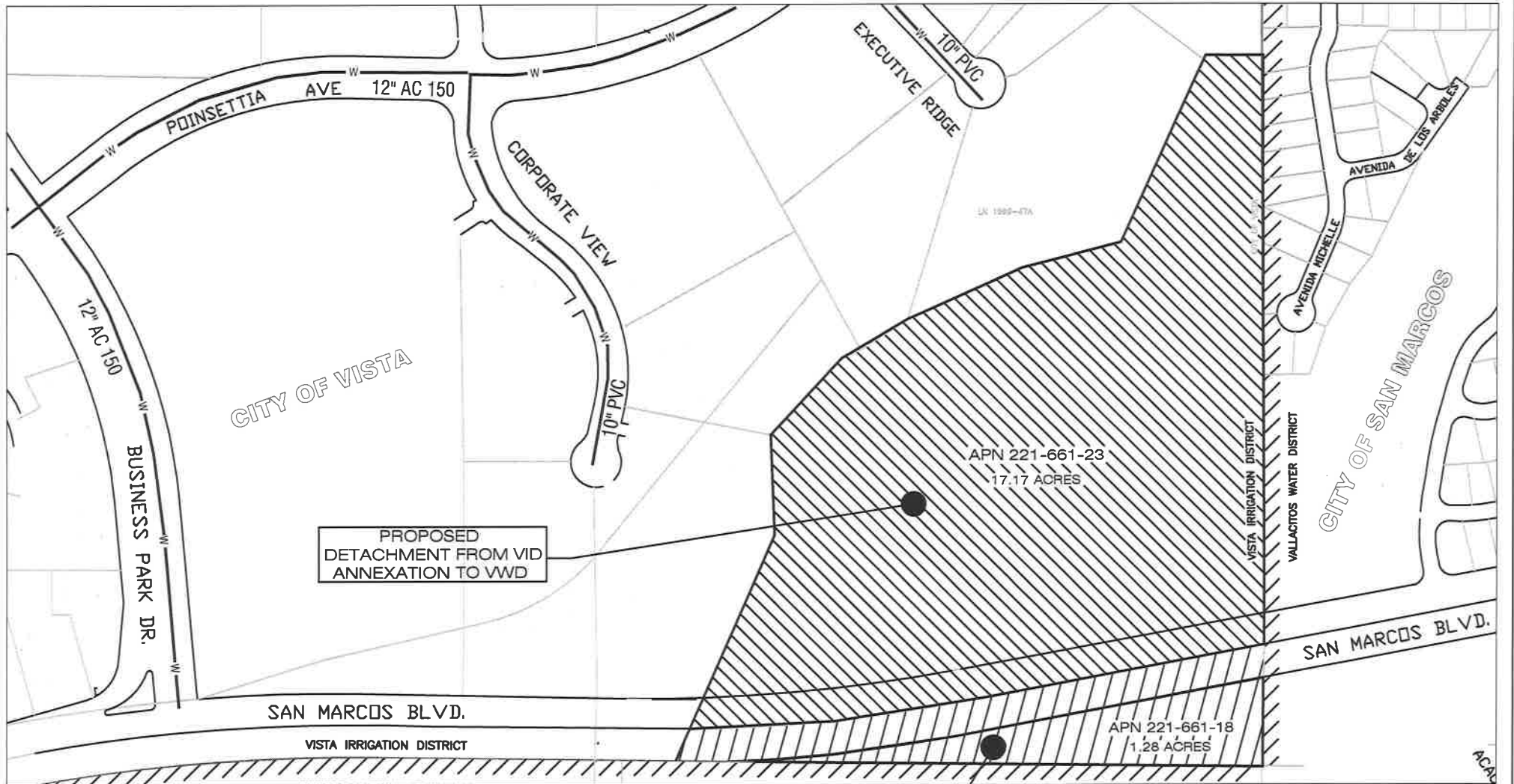
The proposed reorganization is within VWD's sphere of influence as adopted by LAFCO. VWD has both water and sewer facilities currently available to serve this industrial parcel.

The District's blanket and reserved easements through the owner's parcel (APN 221-661-23) are no longer necessary, and it is recommended that these portions be quitclaimed. The Assignment of Water Rights documents for both parcels (APN's 221-661-18 and -23) will return the waived water rights to the District.

Staff will schedule this final detachment at a subsequent Board meeting once LAFCO's Certificate of Completion and recorded documents ordering the final detachment from VID and annexation with VWD are received.

ATTACHMENTS: See attached maps.

EXHIBIT



PROPOSED
DETACHMENT FROM VID
ANNEXATION TO VWD

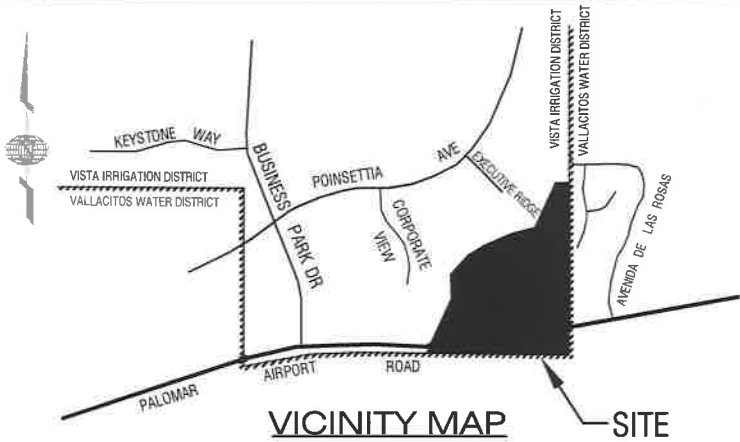
PROPOSED
DETACHMENT FROM VID
ANNEXATION TO VWD

VISTA IRRIGATION DISTRICT

VISTA BUSINESS PARK REORGANIZATION

APN	221-661-18 & 23	T.B.	1128-A2
SCALE	NO SCALE	L.N.	2013-033
APPD. BY	<i>AD</i>	DATE	<i>7/3/14</i>
DRAWN BY	J.V.	DATE	<i>11/6/13</i>
SHEET	1 OF 1	MAP	G26
REVISED:	6/17/14	Al Ducusin	
PATH:	Z:\Engineering\JOBS\LN-Jobs\LN2013\In2013-033\Vista Business Park Reorganizati		

OWNER:
MOXIE PACIFIC PALOMAR LLC
P.O. BOX 220
DEL MAR, CA 92014



VICINITY MAP

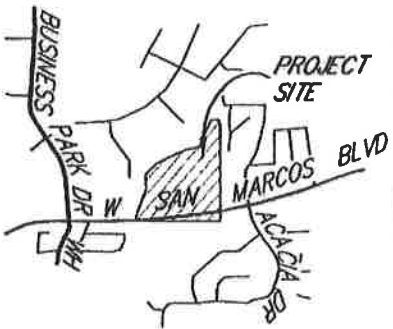
SITE

ANNEXATION TO VALLECITOS WATER DISTRICT ANNEXATION NO. RO 13-46

Approved by the Local Agency Formation
Commission of San Diego

DEC - 2 2013

Michael D. Levin
PM 18002



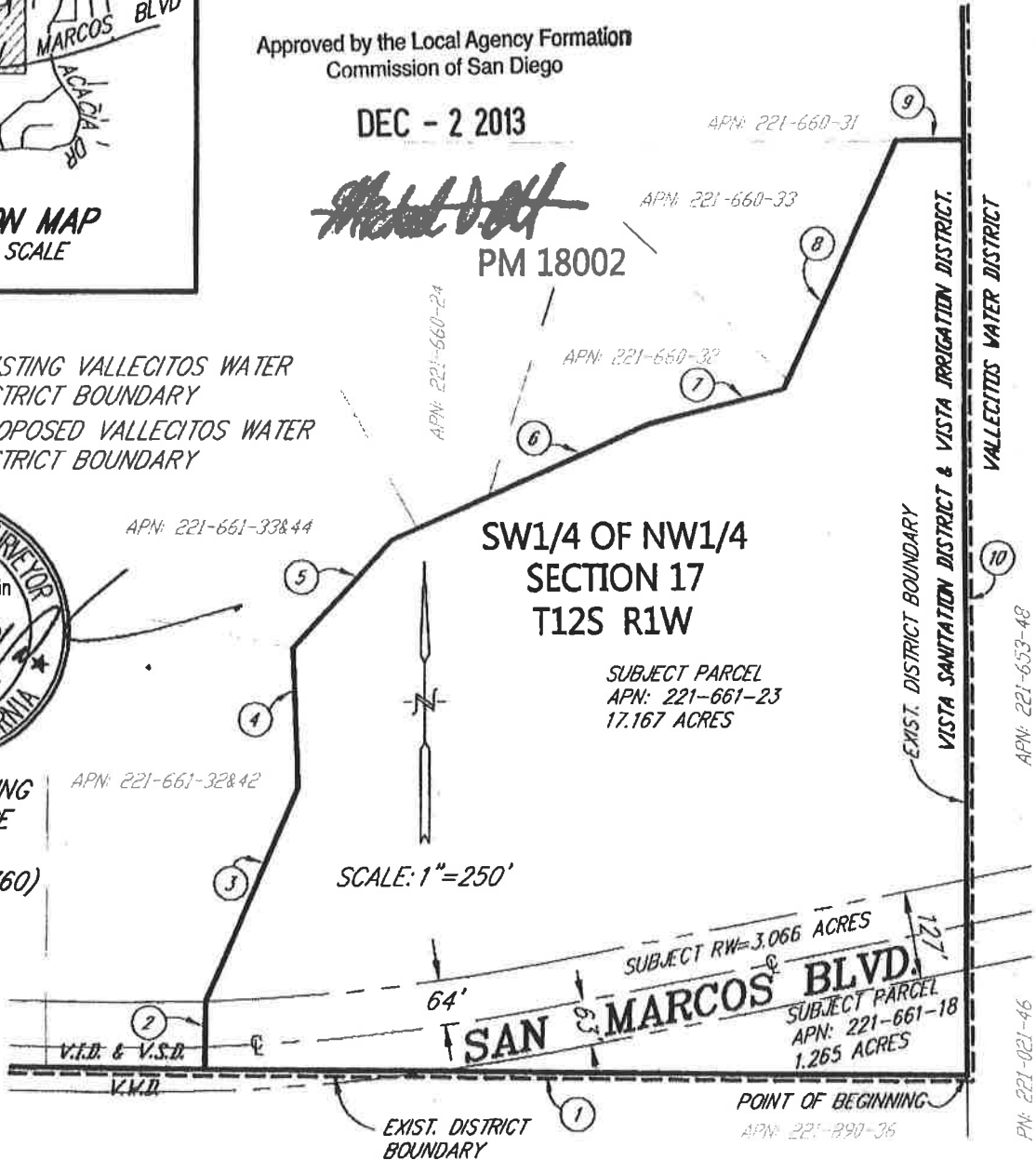
LOCATION MAP
NOT TO SCALE

LEGEND

- EXISTING VALLECITOS WATER DISTRICT BOUNDARY
- PROPOSED VALLECITOS WATER DISTRICT BOUNDARY



EXCEL ENGINEERING
440 STATE PLACE
ESCONDIDO, CA
92029 PHONE (760)
745-8118



COURSES

NO	DELTA/BRG	LENGTH	RADIUS	CHORD
①	N89°11'16"W	1086.32'		
②	N00°48'44"E	96.01'		
③	N23°25'00"E	330.78'		
④	N02°14'04"W	200.00'		
⑤	N42°36'48"E	208.27'		
⑥	N65°55'17"E	401.58'		
⑦	N75°44'57"E	200.00'		
⑧	N24°30'10"E	390.00'		
⑨	S89°54'49"E	99.96'		
⑩	S00°05'11"W	1335.87'		



DISCLAIMER: FOR ASSESSMENT PURPOSES ONLY. THIS DESCRIPTION OF LAND IS NOT A LEGAL PROPERTY DESCRIPTION AS DEFINED IN THE SUBDIVISION MAP ACT AND MAY NOT BE USED AS THE BASIS FOR AN OFFER FOR SALE OF THE LAND DESCRIBED.

ASSESSOR'S PARCEL NOS.	221-661-23 221-661-18
LAFCO RESOLUTION NO.	
ACREAGE	21.498
DATE	12/06/2013
SCALE	1" = 250'



Cash Disbursement Report

Payment Dates 6/12/2014 - 6/25/2014

Payment Number	Payment Date	Vendor	Description	Amount
47799	06/19/2014	Airgas USA LLC	Galvanized Paint	42.24
47800	06/19/2014	California Air Compressor Company	Shop Air Compressor Service	502.15
47801	06/19/2014	CDW Government Inc	Symantec Backup Exec Essentia Maintenance	2,858.00
47802	06/19/2014	Cecilia's Safety Service Inc	Traffic Control - Grapevine	756.00
47803	06/19/2014	Coastal Chlorination & Backflow	Disinfection of Main - Larkhill Dr	320.00
47804	06/19/2014	Crozier's Flowers	Flowers	147.51
47805	06/19/2014	Diamond Environmental Services	Portable Restroom Service	160.55
	06/19/2014		Portable Restroom Service, 1188 Larkhill Dr	45.99
	06/19/2014		Portable Restroom Service	83.68
47806	06/19/2014	Direct Energy	Electric 04/16/2014-05/16/2014	12,919.98
	06/19/2014		Electric 04/16/2014-05/16/2014	33.54
	06/19/2014		Electric 04/16/2014-05/16/2014	3.13
	06/19/2014		Electric 04/16/2014-05/16/2014	1,600.74
	06/19/2014		Electric 04/16/2014-05/16/2014	8.12
47807	06/19/2014	EDCO Waste & Recycling Services Inc	Trash Disposal 05/2014	447.04
47808	06/19/2014	Escondido Metal Supply	Galvanized Tube for Railing at MD Reservoir	229.91
	06/19/2014		Material for Teton Drip System	18.26
47809	06/19/2014	Ferguson Waterworks	Material for Valve Replacement	5,485.34
	06/19/2014		PVC Materials	322.70
	06/19/2014		Material for Valve Replacement	(5,360.34)
47810	06/19/2014	First Bankcard	ACWA Spring Conference 05/2014 P Dorey	1,083.30
	06/19/2014		ACWA Spring Conference 05/2014 P Dorey	39.75
	06/19/2014		ACWA Spring Conference 05/2014 R Vasquez	866.64
	06/19/2014		GRA Meeting 05/14/2014 P Dorey	30.00
	06/19/2014		ACWA Spring Conference 05/2014 R Coox	(216.66)
	06/19/2014		ACWA Spring Conference 05/2014 R Coox	866.64
47811	06/19/2014	Fountain Car Wash	Car Wash Tokens - VID Fleet	480.00
47812	06/19/2014	Gary Arrasmith	Tuition Reimbursement - MGMT 482 06/2014	586.00
47813	06/19/2014	Garza Paving	Larkhill Paving	6,936.00
	06/19/2014		Additional Work - Larkhill Paving	219.00
47814	06/19/2014	Gemini Pest Control Inc	Removal of Bees (16)	1,280.00
47815	06/19/2014	George Weir Asphalt Inc	Road Repair at Lake Henshaw	36,461.00
	06/19/2014		Trench Repair, Striping	32,253.00

Payment Number	Payment Date	Vendor	Description	Amount
47816	06/19/2014	GLC-(CA) Vista LLC	Solar Energy 05/2014	1,838.81
47817	06/19/2014	Glennie's Office Products Inc	Office Supplies	165.08
	06/19/2014		Office Supplies	86.75
	06/19/2014		Office Supplies	86.75
	06/19/2014		Office Supplies	960.82
47818	06/19/2014	Helix Water District	Landscape Contest Winner Sign	29.46
47819	06/19/2014	Home Depot Credit Services	Pop-up Canopy, Tools Box for Truck 46	95.45
	06/19/2014		Paint & Screws for Repairs @ C Reservoir	91.34
	06/19/2014		Materials for C Reservoir, Solder Truck 21	103.63
	06/19/2014		Board for Dump Trucks, Trucks 18 & 13	313.00
	06/19/2014		Lumbar for Meter Vault Upgrade	59.07
	06/19/2014		Paint for Flume	29.51
	06/19/2014		Paint for Flume	62.32
	06/19/2014		Paint for ComCove Plates on Flume Siphon Boxes	177.33
	06/19/2014		Paint for ComCove Plates on Flume Box	31.16
	06/19/2014		Mortar Mix for Beehive Bench	15.20
	06/19/2014		Mortar Mix for Beehive Bench	40.54
	06/19/2014		Filters & Bleach	130.82
	06/19/2014		Weir Repair Materials	54.50
	06/19/2014		Brass & Misc Electrical	67.62
	06/19/2014		Storage Bins	31.55
	06/19/2014		PVC Couplings & Misc Fittings	73.31
	06/19/2014		Misc Copper Supplies	226.48
	06/19/2014		Hydration Station Supplies	26.13
	06/19/2014		Hydration Station Supplies	20.70
	06/19/2014		Hydration Station Supplies	23.78
47820	06/19/2014	Horton Knox Carter & Foote LLP	Legal 05/2014	8,700.00
47821	06/19/2014	Hydro-Scape Products Inc	Hydro Tank Plumbing Fittings	240.59
	06/19/2014		PVC - Shadowridge Reclaimed Water Main Leak	33.13
	06/19/2014		Supplies - Shadowridge Dr main leak	41.73
47822	06/19/2014	IGOE	Flexible Benefit Fee 05/2014	200.00
	06/19/2014		Flexible Benefit Fee 06/2014	195.00
47823	06/19/2014	InfoSend Inc	Water Bill Postage 05/2014	5,488.73
	06/19/2014		Water Bill Mailing Service 05/2014	2,157.49
47824	06/19/2014	Jackson & Blanc	Replaced Valve on Hot Water Pump	54.00
47825	06/19/2014	Lawnmowers Plus Inc	Weed Whip for VID Grounds	525.64
	06/19/2014		Trimmer Line for Line Trimmers	25.90
47826	06/19/2014	Marin Anderson	Customer Refund/Closing	10.37

Payment Number	Payment Date	Vendor	Description	Amount
47827	06/19/2014	McMaster-Carr Supply Company	Hand Rail Parts for Safety Rails C Reservoir	85.23
47828	06/19/2014	Medina Construction	Patch Paving - Road Repair	2,105.12
47829	06/19/2014	Midas	Truck 2, Tires and Mounting	142.86
47830	06/19/2014	Moodys	Dump Fee	50.00
47831	06/19/2014	NAPA Auto Parts	Oil & Air Filters for B-6	67.12
	06/19/2014		Oil Filter for Truck 1	3.11
	06/19/2014		License Plate Lamp for Truck 23	5.39
47832	06/19/2014	National Meter & Automation Inc	Meter 3/4" x 1" electronic read	18,280.08
	06/19/2014		Meter 5/8" x 3/4" electronic read	631.47
47833	06/19/2014	North County Auto Parts	Oil Filter for Truck 73	4.12
	06/19/2014		Oil Filter for Truck 53	4.12
47834	06/19/2014	North County Solutions for Change	Customer Refund/Closing	81.89
47835	06/19/2014	Odilio Vargas	Customer Refund/Closing	17.76
47836	06/19/2014	Pacific Pipeline Supply	Construction Meter Backflow Locks	2,576.88
47837	06/19/2014	Pool & Electrical Products Inc	Chlorine for Water Filling Station Disinfection	6.02
	06/19/2014		Chlorine for WCRH water system	15.75
47838	06/19/2014	R J Supply Co Inc	Safety Vest	63.22
47839	06/19/2014	RDO Trust #80-5800	Gopher Bait	162.80
47840	06/19/2014	Red Wing Shoe Store	Footwear Program	199.80
47841	06/19/2014	Rincon del Diablo MWD	MD Reservoir Water Service 04/18/2014-05/20/2014	27.15
47842	06/19/2014	S & J Supply Company Inc	La Rueda Dr Main Leak & Valve Replacement	4,517.94
	06/19/2014		La Rueda Main Leak & Valve Replacement	(2,241.61)
	06/19/2014		La Rueda Main Leak & Valve Replacement	(2,148.30)
	06/19/2014		Disc Retainer for E32 Regulator	1,266.21
	06/19/2014		5/8" x 2-1/2" Silicon Meter Bolts	1,725.16
	06/19/2014		5/8" x 2-1/2" Silicon Meter Nuts	482.83
47843	06/19/2014	San Diego Gas & Electric	Electric 04/16/2014-05/15/2014	16,625.74
	06/19/2014		Electric 04/29/2014-05/29/2014	86.20
	06/19/2014		Electric 04/29/2014-05/29/2014	53.31
47844	06/19/2014	SignArt	Vinyl Decals - VID Logo & Equipment ID	95.04
47845	06/19/2014	Sunrise Materials Inc	Gravel for Meter Box	23.87
	06/19/2014		Gravel for Meter Box & Stock	23.87
47846	06/19/2014	The UPS Store 0971	Shipping 05/2014	326.85
47847	06/19/2014	Tyler Technologies Inc	Finance Software	10,005.85
	06/19/2014		Consulting 05/19/2014	187.50
	06/19/2014		Consulting 05/18/2014	125.00
47848	06/19/2014	UniFirst Corporation	Uniform Services	311.07
47849	06/19/2014	USA Mobility Wireless Inc	Pager Service 06/2014	28.98

Payment Number	Payment Date	Vendor	Description	Amount
47850	06/19/2014	VWR International LLC	Lab Supplies	106.01
47851	06/19/2014	Walters Wholesale Electric Co	Electrical Conduit	92.77
	06/19/2014		"HOA" Switches	93.57
47852	06/19/2014	William McGraw	Customer Refund/Closing	94.85
47853	06/25/2014	Airgas USA LLC	Acetylene / Oxygen	28.78
47854	06/25/2014	American Backflow Specialties, Inc	Meter Backflow Preventers	8,782.92
47855	06/25/2014	BHA Inc	Warner Spring Resort Boundary Survey, Task B	1,190.00
47856	06/25/2014	Bradshaw A Trust	Customer Refund / Overpayment	155.26
47857	06/25/2014	Business Radio Licensing	Radio License Renewal	95.00
47858	06/25/2014	Canon Business Solutions	Copier Maintenance	178.24
47859	06/25/2014	CDW Government Inc	Computer Supplies	116.10
47860	06/25/2014	City Of Escondido	Escondido Canal Quarterly Use Fee 04/2014-06/2014	2,500.00
47861	06/25/2014	City of Oceanside	Weese Treatment 05/2014	80,665.20
47862	06/25/2014	County of San Diego	Hazmat Permit, Plant #3	1,202.00
47863	06/25/2014	Danielle & Andre Munger	Customer Refund - Overpayment	144.43
47864	06/25/2014	Del Mar Beach Resort	VID Picnic 09/06/2014	250.00
47865	06/25/2014	DIRECTV	TV Service @ VID Headquarter	46.01
47866	06/25/2014	EDCO Waste & Recycling Services Inc	Trash/Recycle @ VID Headquarter	200.49
47867	06/25/2014	FedEx	Express Shipping	63.47
47868	06/25/2014	Hawthorne Machinery Co	B-6, Stabilizer Pads	494.51
47869	06/25/2014	HD Supply Waterworks	Stands for Large Water Meter Installation	432.00
47870	06/25/2014	IDAC West Inc	SCADA Software Development - MD Reservoir	8,995.00
47871	06/25/2014	Iron Mountain Records Management	Offsite Data Storage 05/2014	209.44
47872	06/25/2014	Leon Perrault Trucking & Materials	Trucking & Material 05/2014	2,965.50
	06/25/2014		Trucking & Material 05/2014	738.25
	06/25/2014		Trucking & Material 05/2014	2,568.50
47873	06/25/2014	Lightning Messenger Express	Messenger Service 05/16/2014 & 05/30/2014	43.50
47874	06/25/2014	Medina Construction	Patch Paving - 1060 La Rueda	793.11
	06/25/2014		Patch Paving - 2332 Monte Vista	648.58
	06/25/2014		Patch Paving - 1270 Phillips St	472.70
47875	06/25/2014	Nissho of California Inc	Landscape Services for 06/2014	1,006.00
47876	06/25/2014	North County Industrial Park	HOA Fees, Lot S - Vacant Lot	256.40
	06/25/2014		HOA Fees, Lot T - Headquarter	879.30
47877	06/25/2014	Omega Industrial Marine	Water Proof Liner Installation - C Reservoir	122,520.00
47878	06/25/2014	Phlipda Modrakee	Customer Refund / Closing	27.30
47879	06/25/2014	R J Supply Co Inc	Lens Covers, Cartridge Adapters	146.54
47880	06/25/2014	Ramco Petroleum	Fuel 05/2014	3,245.59
47881	06/25/2014	San Diego Gas & Electric	Electric 05/06/2011-06/05/2014	197.35

Payment Number	Payment Date	Vendor	Description	Amount
	06/25/2014		Electric 05/06/2011-06/05/2014	98.97
	06/25/2014		Electric 05/06/2011-06/05/2014	7,088.92
	06/25/2014		Electric 05/06/2011-06/05/2014	93.91
47882	06/25/2014	Sunrise Materials Inc	Redicrete, 1270 Phillips	27.67
47883	06/25/2014	Tyler Technologies Inc	Conversion Fee - Finance Software	20,572.00
47884	06/25/2014	Underground Service Alert of Southern California	159 New Tickets	238.50
47885	06/25/2014	UniFirst Corporation	Uniform Service	303.53
47886	06/25/2014	United Phosphorus Inc	Teton for ditches	4,735.81
47887	06/25/2014	United Rentals (North America) Inc	Chipping Gun Repair Parts Truck 30 and 48	147.92
47888	06/25/2014	Vallecitos Water District	EAP 07/2014-06/2015	2,401.20
47889	06/25/2014	VG Donuts & Bakery Inc	Board Meeting 6/18/2014	27.88
47890	06/25/2014	Vista Firestone Brake & Smog	Alignment Truck 2	96.00
47891	06/25/2014	WateReuse Research Foundation	WateReuse Direct Potable Reuse Initiative	10,000.00
47892	06/25/2014	Western Printing & Graphics	Printing - Warehouse Issues	647.88
Grand Total:				469,173.16



STAFF REPORT

Agenda Item: 8

Board Meeting Date: July 16, 2014
Prepared By: Roy Coox

SUBJECT: MATTERS PERTAINING TO THE ACTIVITIES OF THE SAN DIEGO COUNTY WATER AUTHORITY

SUMMARY: Informational report by staff and directors concerning the San Diego County Water Authority. No action will be required.



STAFF REPORT

Agenda Item: 9.A

Board Meeting Date: July 16, 2014
Prepared By: Marian Schmidt
Approved By: Roy Coox

SUBJECT: REPORTS ON MEETINGS AND EVENTS ATTENDED BY DIRECTORS

SUMMARY: Directors will present brief reports on meetings and events attended since the last Board meeting.



STAFF REPORT

Board Meeting Date: July 16, 2014
Prepared By: Marian Schmidt

SUBJECT: SCHEDULE OF UPCOMING MEETINGS AND EVENTS AND DIRECTORS ATTENDING

SUMMARY: The following is a listing of upcoming meetings and events. Requests to attend any of the following events should be made during this agenda item.

	SCHEDULE OF UPCOMING MEETINGS AND EVENTS	ATTENDEES
1 *	Council of Water Utilities Meeting <i>July 15, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 7/11/14</i>	Dorey (R) Vásquez (R)
2	Harassment Prevention Training AB1825 Webinar (CSDA) <i>July 16, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 7/11/14</i>	
3	Staying in Compliance: Understanding Fundamental Laws (CSDA) <i>July 17, 2014, 8:30 a.m. – 4:00 p.m. – VID Board Room</i> <i>Registration deadline: 7/14/14</i>	
4 *	North County Water Group Meeting <i>July 23, 2014, 7:30 a.m. – Rincon del Diablo MWD, Escondido</i>	
5	MWDOC Water Policy Forum & Dinner <i>July 30, 2014, 5:30 p.m. – 8:00 p.m.</i> <i>Westin South Coast Plaza Hotel Grand Ballroom, Costa Mesa</i>	
6	Legislative Roundup Webinar (CSDA) <i>July 30, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 7/25/14</i>	
7	Improve Your Outreach Skills and Build Bridges to Your Community Webinar (CSDA) <i>Aug. 6, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 8/1/14</i>	
8	Understanding Board Member and District Liability Issues Webinar (CSDA) <i>Aug. 13, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 8/8/14</i>	
9	Annual Water Conference (Urban Water Institute) <i>Aug. 13-15, 2014 – Hilton San Diego Resort and Spa</i> <i>Registration deadline: 8/7/14; Hotel Group Rate: 7/20/14</i>	MacKenzie
10 *	Council of Water Utilities Meeting <i>Aug. 19, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 8/14/14</i>	Vásquez
11	The New Transparent District – Building Public Trust Webinar (CSDA) <i>Aug. 19, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 8/14/14</i>	
12	Understanding the Brown Act Beyond the Basics Webinar (CSDA) <i>Aug. 21, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 8/19/14</i>	
13 *	North County Water Group Meeting <i>Aug. 27, 2014, 7:30 a.m. – Rincon del Diablo MWD, Escondido</i>	

14 *	Council of Water Utilities Meeting <i>Sept. 16, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 9/12/14</i>	Vásquez
15 *	North County Water Group Meeting <i>Sept. 24, 2014, 7:30 a.m. – Rincon del Diablo MWD, Escondido</i>	
16	Governance Foundations (CSDA) <i>Sept. 29, 2014, 8:30 a.m. – 4:00 p.m. – Renaissance Palm Springs Hotel</i> <i>Early Bird Reservation deadline: 8/22/14</i>	
17	CSDA Annual Conference <i>Sept. 29-Oct. 2, 2014 – Renaissance Palm Springs Hotel, Palm Springs</i> <i>Early Bird Registration deadline: 8/22/14</i>	Vásquez (T, H) MacKenzie (H)
18	WaterSmart Innovations Conference <i>Oct. 8-10, 2014 – South Point Hotel & Conference Center, Las Vegas</i> <i>Registration deadline: 6/2/14</i>	
19 *	Council of Water Utilities Meeting <i>Oct. 21, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 10/17/14</i>	Vásquez
20 *	North County Water Group Meeting <i>Oct. 22, 2014, 7:30 a.m. – Rincon del Diablo MWD, Escondido</i>	
21	Ethics Compliance Training AB 124 Webinar (CSDA) <i>Nov. 13, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 11/10/13</i>	
22 *	Council of Water Utilities Meeting <i>Nov. 18, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 11/14/14</i>	Vásquez
23 *	North County Water Group Meeting <i>Nov. 19, 2014, 7:30 a.m. – Rincon del Diablo MWD, Escondido</i>	
24	ACWA Fall Conference <i>Dec. 2-5, 2014 – Manchester Grand Hyatt, San Diego</i> <i>Registration deadline: TBD</i>	Dorey MacKenzie Miller
25	Must Have Communication Protocols – Board & Staff Webinar (CSDA) <i>Dec. 10, 2014, 10:00 a.m. – 12:00 p.m.</i> <i>Registration deadline: 12/5/14</i>	
26	Colorado River Water Users Association Annual Conference <i>Dec. 10-12, 2014 – Caesars Palace, Las Vegas</i> <i>Registration deadline: TBD</i>	Dorey MacKenzie Miller
27 *	Council of Water Utilities Meeting <i>Dec. 16, 2014, 7:15 a.m. – StoneRidge Country Club, Poway</i> <i>Reservation deadline: 12/12/14</i>	Vásquez

* Non-per diem meeting except when serving as an officer of the organization

The following abbreviations indicate arrangements that have been made by staff:

A=Airline; **R**=Registration; **C**=Car; **H**=Hotel; **T**=Tentative



Agenda Item: 10

STAFF REPORT

Board Meeting Date: July 16, 2014
Prepared By: Marian Schmidt

SUBJECT: ITEMS FOR FUTURE AGENDAS AND/OR PRESS RELEASES

SUMMARY: This item is placed on the agenda to enable the Board to identify and schedule future items for discussion at upcoming Board meetings and/or identify press release opportunities.

Staff-generated list of tentative items for future agendas:

- Statewide emergency drought regulations
- On-site chlorine generation project construction award
- Solar project update
- Recycled water project update

Ethics and Public Service Laws and Principles

Vista Irrigation District AB 1234 Training

Presented by:
Joel D. Kuperberg
Rutan & Tucker, LLP
July 16, 2014



Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

7180013



Session Objectives

1. To familiarize you with laws that govern your service **and** when to ask questions
2. To encourage you to **think beyond legal restrictions** and provide tools for doing so
3. Satisfy AB 1234 requirements
4. Help you understand and apply general ethical principles to promote public trust in government



Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

2

Public Service Ethics is Different

- Laws play a bigger role
- Perception as important as reality
- Public is entitled to honest service from its public officials



Ethics Laws

- The Law = Minimum standards
 - What we *must* do
- Ethics principles = guidance to what we *ought* to do
 - Avoiding the appearance of impropriety
 - Asking yourself “How would this look in the newspaper?”

latimes.com

Vernon and its city attorney sever ties amid scrutiny into lavish salaries, benefits

Laurence S. Wiener, who had been conducting an internal probe, was lauded two months ago for his firm's efforts of increasing transparency in city government. The city is the focus of state and county probes.

By Kim Christensen, Sam Allen and Hector Becerra, Los Angeles Times

October 12, 2010

The city of Vernon, facing scrutiny by the state attorney general and L.A. County prosecutors, is parting ways with its city attorney, who has been conducting an internal probe of one of its top officials' financial dealings.

Neither City Atty. Laurence S. Wiener nor City Administrator Mark C. Whitworth would give the reasons for the abrupt change, which takes effect Nov. 1 and comes amid revelations in The Times of lavish salaries, benefits and expenses enjoyed by top Vernon officials.

Why should I care?





- Press cares
- Public cares
- Legislature cares
- Campaign opponer
- Violations may affe
- Violations may resu
- Violations may resu



Thinking Beyond Ethics Laws

- Ethics laws: The starting point for most ethical analysis in public service
- **Floor** for ethical conduct—not the ceiling
- Just because it's legal, doesn't mean it is (or will be perceived as) ethical

Four Groups of Ethics Laws

1. Personal financial gain 
2. Personal advantages and perks 
3. Governmental transparency 
4. Fair processes 

Group 1: Personal Financial Gain Issues

- **Principle:** Public servants should not benefit financially from their positions



Officials abusing their offices for personal financial gain is a problem nationally ...

- Ted Stevens, Alaska Senator
- Edwin Edwards, former Louisiana Governor
- Rod Blagojevich, ousted Illinois Governor

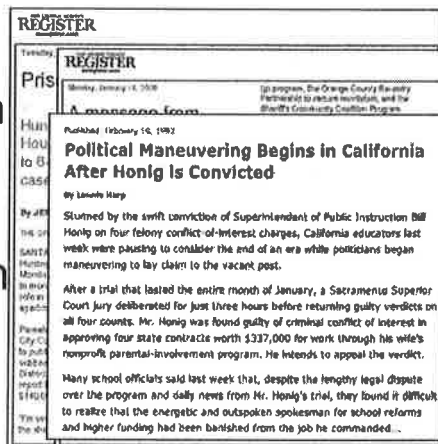


RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

... And locally

- Ex-Huntington Beach mayor Pam Houchen
- Ex-Orange County Sheriff Michael Coron
- Ex-State Schools Superintendent Bill Honig



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

10

Bribery

- Public officials may not solicit, receive or agree to receive a benefit in exchange for their official actions
- Penalties: Loss of office, prison time, fines, restitution, attorneys' fees and public embarrassment



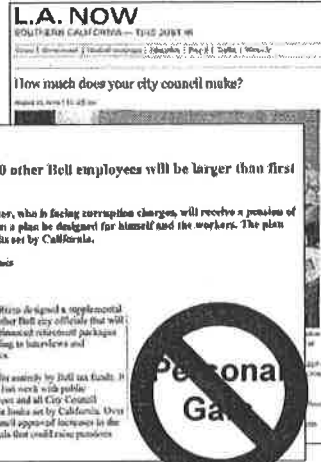
Similar Cases

- Influencing Official Action:** Asking, receiving or agreeing to receive any bribe upon any agreement or understanding that the official's vote or action shall be influenced thereby is punishable by up to four years in prison. Penal Code §68.



Embezzlement

- Padding Salary/Per Diem/Pension
- Improper Reimbursement
- Unauthorized Travel



Disqualification Based on Financial Interests

- Political Reform Act of 1974 (G.C. §81000)
- Appointee Campaign Contribution (G.C. § 84308)
- Contractual Conflicts of Interest (G.C. § 1090)



Political Reform Act of 1974

- **Principle** – “Public officials, whether elected or appointed, should perform their duties in an impartial manner, **free from bias caused by their own financial interests** or the financial interests of those persons who have supported them.”
- **Actual Bias Irrelevant** – Quantitative thresholds.



Political Reform Act of 1974

- **General Rule** – You may not make, participate in, or influence a decision if it may have a **reasonably foreseeable material financial impact** on you, your immediate family.
- “Material impact” can be positive or negative, actual or potential.
- **Timing** – Rolling 12 months.



Political Reform Act of 1974

- **Disqualification**
 - Abstain from participation
 - Leave room
- **Disclosure**
 - Assuming Office
 - Annual (by April 1)
 - Leaving office



Who is Subject to the Law?

- All public officials and employees involved in making governmental decision
 - Elected officials
 - Appointed officials
 - Employees
- Some consultants



Who is Subject to the Law: Test

- Make a final governmental decision
- Compel or prevent the making of a governmental decision by action or inaction
- Make recommendations that are regularly followed



What Kinds of Interests?

- Sources of Income, Loans or Gifts
- Real Property Interests
- Business Interests
- Stocks
- Financial effect on the official or the official's immediate family



What Kinds of Interests?

- Sources of Income: \$500 or more
 - Your own income
 - Promised income
 - Spouse/child's income
 - Loans/guarantors
- Exclusions
 - Government salary
 - Campaign contributions



What Kinds of Interests?

- Gifts: \$440/calendar year (2013-2014)
 - Tangible items
 - Services
 - Meals, drinks, entertainment
 - Transportation and Lodging
- Excluded
 - Exchanging gifts of equal value
 - Personalized plaques
 - Trophies less than \$250
 - Gifts from extended family
 - Gifts returned within 30 days



Changes to Gift Rules

- § 18942
- Many new exceptions
- Some new restrictions



Gift Exception – Home Hospitality

- Exemption now not applicable unless host's relationship *unrelated* to official's position
- Exemption expanded
 - Vacation home
 - RV, boat



Gift Exception – Reciprocal Exchanges

- Taking turns to pay for
 - Meals
 - Movies
 - Sports events



Gift Exception – Guest at a Wedding

- Gifts given to attendees
- Meals and entertainment
 - Unless exceed benefit to other guests



Gift Exception – Bereavement, Neighborliness

- Bereavement Offerings
 - Flowers, etc.

- Acts of neighborliness
 - Normal acts of
 - Kindly neighbor
 - Good Samaritan



Gift Exception – Bona Fide Dating Relationship

- Not reportable

- But official has economic interest in dating partner
 - Cannot participate in decisions affecting partner's financial interests



Gift Exception – Acts of Human Compassion

- Compassionate offerings to help official cope with misfortune
 - Medical expenses – injury, illness
 - Loss of employment, housing
- Restriction: Donor may not:
 - Lobby agency
 - Do business with agency
 - Be regulated by agency



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

31

Gift Exception – Long-Time Friends

- Long term personal friendship unrelated to official's position
- Restrictions: Donor may not:
 - Lobby agency
 - Do business with agency
 - Be regulated by agency



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

32

Gift Exception – Gifts Unrelated to Official's Position

- Gifts based on personal, business or other relationship
- No evidence that official may take any official action that may financially benefit donor
- Does not apply to gifts from lobbyist



Gift Exception – Gifts to Family Member

- Presumption that gift to family member is gift to official if:
 - No established relationship between donor and family member; or
 - Gift made by donor who is:
 - Lobbyist
 - Involved in action in which official will foreseeably participate
 - Regularly seeks contracts or comes before agency



What Kinds of Interests?

- Real Property Interests: \$2,000 or more
 - Within 500': Presumed conflict
 - Not measured from HOA-owned land
 - Outside 500': Conflict if decision would:
 - Change development or income producing potential of property
 - Change character of the property that would affect market value
 - Increased density, traffic, parking, noise



What Kinds of Interests?

- Real Property Interests (Cont'd)
 - Decision to construct public facilities triggers conflict if:
 - Facilities result in new or improved public services; and
 - Either:
 - Services distinguishable from those provided to similarly situated properties; or
 - Disproportionate benefit or detriment to official



Determining Whether Financial Effect is Foreseeable

- New Test for Foreseeable Impact
 - Explicit Involvement
 - Implicit Involvement
- Economic Interest Explicitly Involved
 - If the economic interest is a named party in, or subject of governmental decision
 - Permits, entitlements, licenses, contracts



Determining Whether Financial Effect is Foreseeable (Cont'd)

- Economic Interest Not Explicitly Involved in Decision
 - Test: If financial effect is "realistic possibility," and more than hypothetical or theoretical
 - NOTE: Effect need not be likely to be foreseeable
- Examples of factors to consider
 - Whether financial effect contingent on other intervening events
 - Whether effect on economic interest anticipated as potential outcome
 - Whether decision would equally affect similarly situated persons or businesses



Disqualification versus Abstention

- Abstention = voluntary
- Disqualification = Legally required
 - Public statement of reason
 - Does not imply wrongdoing
- Non-compliance may result in fines and penalties may invalidate decision



When in doubt, disqualify yourself!

- You are responsible for your own compliance
- Agency counsel may help
 - Full disclosure of facts
 - Not confidential
 - Get advice in writing
- FPPC may help



If You Are Disqualified

- Steps to take (on or in the record):
 - *Identify* nature of conflict
 - *Leave room* (unless matter on consent)
 - Don't discuss or influence
 - *Limited exceptions* to speak at a public meeting regarding an effect of decision on personal interest (owned property or owned/controlled business)



Penalties

Los Angeles Times

FORMER STADIUM OFFICIAL PLEADS GUILTY

Los Angeles Times Staff Writer
 The former stadium official pleaded guilty to a misdemeanor charge of providing false information to the public. The official, who worked for the stadium authority, admitted to providing false information to the public during a public hearing. The official was charged with providing false information to the public during a public hearing on the stadium project. The official was charged with providing false information to the public during a public hearing on the stadium project. The official was charged with providing false information to the public during a public hearing on the stadium project.

- Invalidates decision
- Misdemeanor (could result in loss of local office)
- Fines (\$5,000-\$10,000 per violation)
- Attorneys fees (yours and others)
- Embarrassment (personal/political)



Reporting Requirements

- Political Reform Act requires Annual Reporting of Economic Interests.
 - Investments in Business Entities
 - Real Property
 - Sources of Income
 - Management Positions in Businesses
 - Sources of Gifts Aggregating \$50 per year.



Government Code § 87103

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

43

Reporting Group Gifts

- Report gifts over \$50
- If group gift, only report individuals contributing \$50+ to purchase gift



Reporting Wedding Gifts

- Value at half (1/2) the received gift value for each spouse

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

44

Reporting Invitation-Only Events

- Pro-rata share of food, catering and entertainment
- Drop-in Rule
 - Value of minimal appetizers, drinks consumed by official not reportable
 - But lobbyist hosts must report expenses on pro-rata basis



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

45

Appointee Campaign Contributions – Restrictions (G.C. 84308)

- Special rules covering receipt of campaign contributions
 - Limits on contributions
 - Disqualification
- Not applicable to elected officials if:
 - Acting as elected official; and
 - All members of governing board are elected



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

46

Appointee Campaign Contributions – Restrictions (G.C. 84308)

Who is covered:

- Appointed Officials
 - Commissioners
 - Elected officials in appointive capacity
- Parties to applications for license, permit, entitlement to use, contract
- Participants interested in approval or denial of the application



Appointee Campaign Contributions – Restrictions (G.C. 84308)

What is covered:

- Campaign contributions of more than \$250
 - Received by appointee
 - Solicited by appointee
 - Directed by appointee to third party
- Contribution need not directly benefit appointee
- Contribution need not relate to appointee's agency



Appointee Campaign Contributions – Restrictions (G.C. 84308)

- **Contribution Restriction:** Appointee may not *accept*, or *solicit* or *direct* a contribution of more than \$250 from any *direct party* or *interested party* to an application before the appointee's body, while application pending or for 3 months following the date of decision.



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-941-5100 | www.rutan.com

49

Appointee Campaign Contributions – Restrictions (G.C. 84308)

- **Disqualification Rule:** Appointee receiving contributions aggregating more than \$250 within past 12 months must *disclose receipt* and *disqualify* if the source of contribution is a *direct* or *interested party* to an application pending before the appointed body.



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-941-5100 | www.rutan.com

50



Best Practice

- Avoid temptation to view public service as opportunity for personal gain
- Look at every decision and ask yourself whether it involves a financial interest for you
- Consult counsel and, when in doubt, disqualify yourself



Official faces penalty over donations

State officials were found to have violated ethics laws by accepting gifts worth more than \$1,000 from a donor who had a business deal pending with the state.

Gov. Gray Davis was found to have violated the law by accepting a \$2,000 gift from Per Thomas, a state contractor, while Davis was negotiating a contract with Thomas.

The state ethics board found that Davis violated the law by accepting the gift while he was negotiating the contract. Davis was fined \$1,000 and ordered to return the gift.

The board also found that Davis violated the law by accepting the gift while he was negotiating the contract. Davis was fined \$1,000 and ordered to return the gift.



§ 1090 Warning! Special Rules for Contracts

- Virtually all elected officials, employees covered – consultants may also be covered
 - Direct or indirect interest
 - Agency barred if elected official has an interest that is not remote
- May have to refund money paid
- Felony: \$1,000 fine, imprisonment, loss of office
- Contract is void



Leaving Office

- Prohibition against participation in decisions affecting future employer.
- Rule: Elected official and agency CEO prohibited from representing third parties before official's agency for one year after leaving office. Government Code § 87406.3



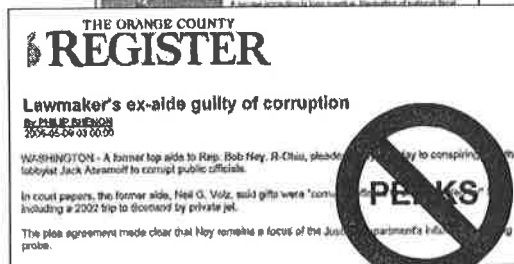
Group 2: Perks

- **Principle:** Public servants should not receive special benefits by virtue of their positions
- **Principle:** Democratic equality



Types of Rules

1. Perks that others offer you (gifts)
2. Perks that you give yourself/misuse of public resources



RUTAN
 RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

55

Gifts Do Not Always Have Bows

1. Meals, food and drink (including receptions)
2. Entertainment (concerts, sporting events)
3. Certain travel and lodging



RUTAN
 RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

56

Beware of Constituents, Consultants Bearing Gifts

Local 12 | Saturday, Feb. 14, 2009

ORANGE COUNTY

- If gift exceeds \$400, source must disqualify
- But gift over \$400 is source even with:
 - Disclosure
 - Disqualification

Los Alamitos councilwoman faces \$300 fine for accepting gift

Commission will consider whether to accept Marilyn Poe's payment, which exceeded the limit in 2004.

BY JAMIE LYNN FLETCHER
ORANGE COUNTY REGISTER

LOS ALAMITOS • Councilwoman Marilyn Poe may face a \$300 fine for exceeding the single-source gift limit for elected officials.

The board of directors today will consider approving the fine for Poe for a gift she received in 2004. The FPPC did not state what the gift was on the report.

Poe reported her gift on her statement of economic interest but it was \$50 over the allowed amount, FPPC officials said.

"I received the letter, I realized I was in violation and I paid it," Poe said.

The board could either choose to refund Poe's money or accept the payment, said FPPC Executive Director Roman Florian.

The FPPC in 2004 allowed council members to accept \$400 in gifts per year from a single source. Poe accepted a gift worth \$450, according to the FPPC.

Council members this year are allowed to accept \$420 in gifts from a single source, Florian said.

Florian added that Poe is not the only council member to catch up on unacknowledged in-office gifts. The FPPC in 2007 named a new executive director who is trying to expedite all past claims, he said.

"That's been one of the efforts to reduce that so there's a more timely response," he said. "This just shows that we're being efficient."

illegal

FILE PHOTO
Marilyn Poe

CONTACT THE WRITER:
714-649-6622 or
jfl@ocregister.com

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

59

Penalties

- Up to \$10,000 criminal fine per violation / \$5,000 civil penalty per violation
- Disqualification from holding elective office or lobbying
- In private enforcement action, violator liable for enforcer's attorneys' fees



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

60

New Rule:

▪ Non-Profit Fundraising Event Tickets

- Issue: How to value ticket to non-profit entity fundraising event
- Usually: Report meal (non-fundraising) portion of ticket
- New rule for non-profit fundraising event tickets



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

61

FPPC §18946.4: Special Rule for 501(c)(3) and Political Fundraisers:

- Tix to fundraisers by tax-exempt non-profits and political committees have ***no value*** if:
 - Non-profit or political entity ***itself*** provides the ticket to the official
 - The official receives ***only two tickets*** from the non-profit or political entity



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-841-5100 | www.rutan.com

62

Misuse of Public Resources



- Personal use of public resources prohibited (Government Code § 8314)
 - Public resources include staff time and agency property
 - Personal use includes political campaigns

Case Study

- County Supervisor running for re-election
- Supervisor uses County employees' phones and copiers in re-election effort
- Supervisor convicted of misuse (theft) of public resources
- Fine and jail time

PEOPLE v. BATEL
71 Cal.App.3d 613; 149 Cal.Rptr. 731

636

[Crim. No. 9091 Fourth Dist., Div. Two Jan. 14, 1976.]

THE PEOPLE, Plaintiff and Respondent, v.
ROBERT WILLIAM BATTIN, Defendant and Appellant.

SUMMARY

A county supervisor was charged by indictment with theft (Pen. Code, §§ 844-847), misuse of public funds (Pen. Code, § 424, subd. 2), and perjury (Pen. Code, § 265) in connection with his alleged utilization of his supervisory staff in his campaign for the nomination for Lieutenant Governor. The jury returned verdicts of guilty on the misuse of public funds count, which prohibits the use of public funds for any purpose not authorized by law, but guilty on the fraudulent claims count, and was hung on the theft count. The trial court later dismissed the theft count pursuant to the People's motion. Imposition of sentence was suspended and defendant was given three years' informal probation on certain conditions. (Superior Court of Orange County, No. C-34528, Kenneth E. Lee, Judge.)

The Court of Appeal affirmed. The court held the evidence showed that defendant's county staff members were compensated with county funds for their county and campaign work, that defendant authorized and approved the payment of salaries to the staff, and that defendant's diversion of county employees to the performance of tasks in aid of defendant's personal political campaign amounted to a use of public resources for a purpose not authorized by law. The court rejected defendant's contention that the statute was an ex post facto law, that it was retroactive, and that it violated the separation of powers doctrine. The court also held defendant's conviction was supported by sufficient evidence, and that the statute did not require proof of specific intent. The court rejected contention by defendant that his conviction was overturned because his volunteer campaign force was not



Consequences of Violations

- Civil penalties: \$1,000/day fine plus 3X value of resource used
 - (Government Code § 8314)
- Criminal penalties: 2-4 year prison term and disqualification from office
 - (Penal Code § 424)
- Can also have income tax implications



Case Study: Greedy Mayor

By Jackie Gross
latimes.com.

<http://www.latimes.com/news/local/la-me-compton11feb11,1,4915241.story?col=>

Compton Ex-Mayor Bradley Is Convicted

Two other former officials also are found guilty of misusing funds. Two Compton Credit Cards Said to Be 'Piggy Banks'

By Richard Muro
Times Staff Writer
February 11, 2004

Self-styled 'gangster' on felony corruption charges.

Documents offer details of city officials charging personal items. Their lawyers deny it.

By Ted Rohrlich
Times Staff Writer
April 10, 2003

Several Compton officials used many dollars for private expenses ranging from Grand Jury. Some of the officials at the city had already paid them for, a

By Jackie Gross
latimes.com.

<http://www.latimes.com/news/local/la-me-bradley14may14,1,6233166.story?col=la-headline-cabiforais>

Former Mayor Gets 3 Years

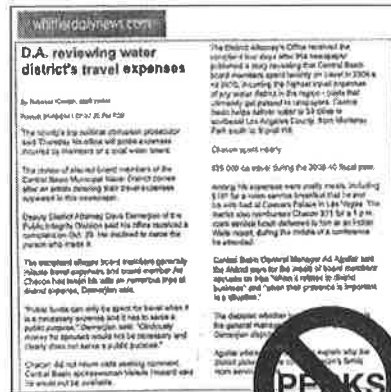
Compton's Omar Bradley is denied probation on his corruption conviction. Two other officials will be sentenced today.

By Cynthia Daniels
Times Staff Writer
May 14, 2004

Former Compton Mayor Omar Bradley was sentenced to three years in state prison Thursday on felony corruption charges of spending city money on himself.

Agency Expense Reimbursement

- Be familiar with your agency's policies/limits
 - What kind of expenses
 - What rates for food, lodging, transportation
 - The importance of documentation
- **Note:** Spouse expenses not reimbursable



Rules for Reimbursement

- Expenses must be "Actual and Necessary"; more than merely beneficial.
- Must be authorized by written Agency Policy
- Written Expense Report with receipts.
- No reimbursement for spouse's expenses.
- Third party hosting may be problematic.
- Reimbursement of agency for personal use of funds will not avoid trouble.



FPPC §18944.1: Rules re Tickets and Passes that Agency Gives to its Officials

- Issue: Agencies accused of abusing tickets to own events:
 - Anaheim Stadium
 - Orange County Fairgrounds and Amphitheatre



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

69

Event Ticket Rule #1: Source Other Than Agency Gives Ticket to Official



- Ticket is not a gift to official if:
 - Official "performs" a ceremonial role or function on behalf of his or her agency
- Examples:
 - Baseball ticket to Councilmember to sing National Anthem
 - Dinner ticket to Mayor to present award to City resident

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

70

Event Ticket Rule #2: Third Party Gives Ticket to Agency; Agency Gives to Official



RUTAN
RUTAN & TUCKER, LLP

- **Examples:**
 - Disneyland or SD Zoo provides agency with 10 free passes
 - UCI or SDSU gives agency 5 seats at annual economic forecast luncheon.
- **Rules:**
 - Ticket cannot be earmarked for any particular official
 - Agency determines in its sole discretion who may use the ticket
- **Distribution must comply with ticket distribution policy adopted by agency.**

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

71

Event Ticket Rule #3: Agency Owns Ticket Given to its Own Official



RUTAN
RUTAN & TUCKER, LLP

- **Circumstances:**
 - Agency purchases tickets
 - Agency receives tickets because event on agency grounds
 - Agency receives ticket because it controls the event
- **Rule: Distribution must comply with ticket distribution policy adopted by agency.**

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

72

Agency's Required Event Ticket Distribution Policy (FPPC §18944.1(c)):



- Policy must contain:
 - Statement of public purposes to be accomplished by distribution of event tickets.
 - Requirement that distribution shall accomplish the stated public policy
 - Prohibition against official transferring an agency-distributed ticket to anyone other than immediate family member for personal use.
- Policy to be posted on agency website "in a prominent fashion."

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

73

Distribution of Event Tickets to Agency Officials Must be Listed on FPPC Form (FPPC §18944.1(d))



- FPPC Form 802
- Include:
 - Date and description of event
 - Number of tickets distributed to each official, and face value of ticket
 - Description of the public purpose under which the distribution made

RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

74

Gifts From Agency to Agency's Own Officials

- FPPC §18944.3: "...payment by a government agency that provides food, beverage, entertainment, goods or services of more than a nominal value to an official in that agency is a gift to that official unless the payment is a lawful expenditure of public moneys."



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

75

Gifts from Agency to Agency's Own Officials (cont'd)

- Circumstance:
 - Agencies providing retiring officials expensive gifts
 - Agencies pay for expensive dinners for elected
- Agency provided meals, snacks **not a gift** if a "lawful expenditure of public moneys."
- Agency can adopt policy establishing public purpose for:
 - Meals, snacks at meetings held during mealtimes
 - Provision of shirts, jackets with agency logo



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

76

Other Perk Rules

- Personal Perk Bans
 - Free or discounted transportation from transportation companies (Cal. Const. Art. 12, § 7)
 - Honoraria (Government Code § 89502)
- Agency Perk Bans
 - Mass mailings (Government Code Sec. 89001)
 - Gifts of public funds (Cal. Const. Art. 16, § 6)



Best Practice

- Avoid perks *and* the temptation to rationalize about them
 - Legally risky
 - Public relations headache
 - Possible loss of office
 - Public embarrassment



Group 3: Transparency Laws

- **Principles:**

- It's the public's business
- The public will not trust what it cannot see



Transparency Rules

- Conduct business in open and publicized meetings
- Encourage public to attend and participate in meetings
- Allow public inspection of records



Transparency Rules – Ralph M. Brown Act

- **Open Meeting Requirement:** Public has the right to attend and observe government in action.
- **Agenda Posting Requirement:** Public has the right to advance notice of what business government will consider.
- **Public Comment Required:** Public has the right to address government on:
 - Any item to be considered by government
 - Any item within subject matter jurisdiction of government



Brown Act: “Meetings” of Legislative Bodies Must be Open to the Public

- **Meeting:** “Any congregation of a *majority* of the members of a legislative body *at the same time and place* to *hear, discuss, or deliberate upon* any item within the *subject matter jurisdiction of the legislative body...*”
- **Serial Meeting Prohibitions:** Use of *direct communications, personal intermediaries, or technological devices* employed by a *majority* of the members to *develop a collective concurrence* is prohibited.
- **Exceptions to Meeting:**
 - Individual contacts
 - Conferences open to the public
 - Community meetings
 - Other open and noticed meetings
 - Social events



Public Participation

- No governing body action on items not listed on posted agenda
 - Limited exceptions
- Public's right to be heard before or during body's consideration of an issue
- Public comment
 - Grandstanding, negative feedback and gadflies must be accepted as part of public service



Public Participation

- Public Access and Disability-related accommodation.
- Meetings within jurisdiction of agency
 - Limited Exceptions



Consequences of Violations

- Injunction/Recording of Closed Sessions
- Nullification of decision
 - Cure Provisions
 - Fix violations ASAP!
- Criminal sanctions: misdemeanor
- Costs and attorneys' fees
- Intense adverse media attention

At one such meeting, trustees discussed making Leckey's opportunity to speak at meetings, according to district documents.

Friday, October 3, 2009
Court rulings against districts involving attorney Spencer Covert

By SCOTT BARTHDAL
The Orange County Register

Local judges have opened at least four legal challenges filed by open-government advocates against attorney Spencer Covert and his clients. The Tustin-based attorney specializes in representing school districts and community college districts.

1997: A San Bernardino County judge rules that the Chino Valley Unified School District board illegally met in closed session to fire its superintendent and buy out his contract without giving adequate public notice. The judge chides the school board for refusing to take public comment at special meetings. Mr. Covert was the chief architect of the termination of a superintendent that ultimately cost Chino taxpayers tens of thousands of dollars in addition to legal fees. "Senior Chino trustee Don Chatham says,

1998: Orange County Superior Court Judge Tully Deyzer orders the South Orange County Community College District to tape-record their closed sessions for half-year because of what he calls "an ill-fated and blatant misconstruction" of their open-meetings law. Covert says the case was eventually settled on appeal.

2009: Orange County Superior Court Judge Andrew J. Scheraga orders the Orange Unified School District to record its closed sessions after the district's attorney, Spencer Covert, sends the district a letter threatening to sue over the district's records. Covert says the district is "considered to be in violation of the law" and would protest a proposed resolution.

Intentional Violation

- Each Member of a Legislative Body who
 - Attends a meeting which does not comply
 - Where action is taken
 - With the intent to deprive the public of information to which he has reason to know the public is entitled
 Is guilty of a misdemeanor.
- Criminal sanctions (up to 6 months in jail; \$1,000 fine)



Public's Right to Records

- Right is express in State Constitution
 - Cal. Const. Art. 1 § 3
- Agenda and meeting materials
 - Government Code §54954.1
- Other writings prepared, owned, used or retained by the agency (including emails and other electronic documents)
 - Government Code § 6252
- Enforcement: Person seeking records entitled to costs and fees
 - Government Code § 6259



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

91

Exceptions to Records Disclosure

- Statutory exemptions from disclosure
 - Strictly construed
 - *E.g.*, personnel files, medical records, utility customer information
 - BUT: Emails from/to personal device and accounts
- Catchall exemption: Public interest in non-disclosure outweighs interest in disclosure.
- Agency may disclose anyway unless disclosure prohibited by law



RUTAN
RUTAN & TUCKER, LLP

Rutan & Tucker, LLP 811 Anton Blvd., Suite 1400, Costa Mesa, CA 92626 | 714-641-5100 | www.rutan.com

92

Financial Interest Disclosure (Political Reform Act of 1974)

- Transparency includes obligation for high level public servants to disclose financial interests
 - Assuming office
 - Annually while in office
 - Upon leaving office



Best Practices

- Assume all information is public or will become public
- Don't discuss agency business with fellow decision-makers outside noticed public meetings or permitted closed meetings



Group 4: Fair Process Laws

- **Principle:** Public expects governmental decision-makers to be impartial and avoid favoritism



Examples

- Due process requirements
 - Notice and fair hearing opportunity
- Rules against bias
- Competitive bidding requirements
- Incompatible office prohibitions



Examples, continued

- Disqualification requirements if decision involves family members
- Campaign contributions (appointed bodies)

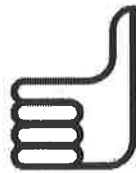


Common law conflict - BIAS

- Personal interest in an outcome
- Personal animosity against an applicant
- Pre-existing opposition to specific project
 - Political Reform Act covers financial conflicts; common law covers non-financial interests as well.

Clark v. Hermosa Beach (1996)
48 Cal. App. 4th 1152





Best Practices

- Avoid making public statements of positions on issues that may become before you
- Think fairness and merit-based decision-making in contracting decisions (not personal relationships)
- Listen during public meetings



More considerations

- Seeking election or appointment to office is a private activity
- Soliciting political contributions from agency officers and employees generally prohibited
- Giving or promising favors may be prohibited
- Using agency time or identity for nongovernmental purpose is inappropriate



Beyond the Law: Public Service Ethics Principles

Ethics = Values

- Six universal ethical values:
 - Trustworthiness
 - Loyalty
 - Responsibility
 - Community interest
 - Respect
 - Fairness
 - Compassion

Source: Institute for Global Ethics

Applying Values to Public Service

Trustworthiness:

- I am truthful with my fellow officials, the public and others.

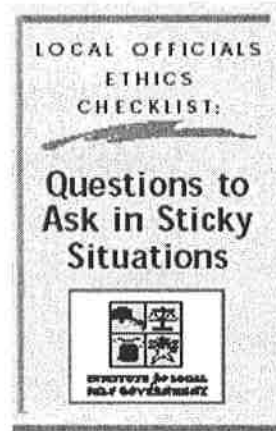


Analysis by Ethical Dilemmas

1. Legal issue v. Ethical issue
2. Two competing "right values"
3. Doing the right thing costs more than one wants to pay

Questions to Ask

- What would make the public feel best/inspire public confidence?
- What would you want to read about on the front page?
- What would you be proud to tell your mother about?



Best Practices

- Be clear on your own values/how they apply to public service
- Promote a culture of ethics at your agency



Key Lessons

- The law sets minimum standards for ethical behavior
- Violations of ethics laws carry stiff penalties
- When in doubt, ask and ask early

Resources for Further Reading: Conflicts of Interest

- *Conflicts of Interest* (Cal. Atty. Gen.)
- *Can I Vote?* (FPPC)
- *Your Duty to File* (FPPC)

Resources for Further Reading: Transparency

- *The Brown Act* (Cal. Atty Gen.)
- *Public Records Summary* (Cal. Atty Gen.)
- *ABCs of Open Government Laws* (I.L.G.)

Resources for Further Reading: Transparency

- *Ethics Law Compliance: Best Practices* (I.L.G.)
- *Walking the Line: What To Do When You Suspect an Ethics Problem* (I.L.G.)
- *Questions to Ask in Sticky Situations* (I.L.G.)

AB 1234 Compliance

- Sign in
- Proof of participation certificate
- Provide to clerk as public record
- Beyond the minimum

Questions?