
**Item 5-Enforcement Consent Calendar-College of the Canyons Foundation
FPPC 19/475**

Stephen Petzold [REDACTED]

Fri, Jul 10, 7:04 AM

To: RMIadich@FPPC.CA.gov <RMIadich@fppc.ca.gov>

Cc: BHatch@FPPC.CA.Gov <BHatch@fppc.ca.gov>, EWilson@FPPC.CA.Gov <EWilson@fppc.ca.gov>, FCardenes@FPPC.CA.Gov <FCardenes@fppc.ca.gov>, ahayward@fppc.ca.gov <ahayward@fppc.ca.gov>

[REDACTED]

Dear Mr Miadich and fellow FPPC Commissioners,

I am asking each of you collectively , and as individuals to pull item #5 (Enforcement Consent Calendar). for separate consideration and vote.

I do not believe that the investigation conducted by Ruth Yang was thorough and in compliance with FPPC rules and regulations.

Specifically, there is no reference in the stipulation to the College of the Canyons Foundation qualifying as a Multipurpose Organization and complying with those special requirements.

The funds from the COC Foundation were expended through a Special Grant Request issued by the Chancellor of the college and counter signed by her surrogates Sharlene Colelli VP Business Services, and Cathy Ritz Chief Operational Officer. Each of these individuals, to the best of my knowledge is an employee of the public agency, Santa Clarita Community College District.

The funds were drawn against the "Funds for the Future" account. There is no record of the COC Foundation having a vote to support the campaign with a financial contribution in any amount.

Importantly, there is no record or disclosure of the contributors to the Foundation or more specifically the Funds for the Future account.

FPPC Manual 1 , Chapter 4.12 states....paraphrased "it is prudent to question unusually large contributions from a nonprofit or multipurpose organization that is not register as a political committee on the Secretary of State website".

I can find no record of the COC Foundation being registered as a political committee and the issue is not addressed in the stipulation.

It is my contention the the COC Foundation was a Multipurpose organization that served as an Intermediary for the substantial (3X \$50,000) contributions to the committee. The COC Foundation met the qualification of a Major Donor to the Committee.

From the FPPC Manual Manual 1 ..."Failure to Disclose the source of a contribution is considered one of the most serious violations of the Political Reform Act"

I believe you should reject the stipulation and refer the item back to the enforcement division for a more thorough investigation and consideration.

The stipulation presented cannot be considered without reference to the stipulation you approved at your last meeting against the Yes on E Committee and the Principal Officer/Treasurer Robert McCarty.

For the record Mr McCarty was a member of the College of the Canyons Foundation during the campaign.

I find it very suspicious that stipulation 17/287 includes this language on page 8, line 18. "It is in the interest of settlement that the Enforcement Division is not counting as a violation the committee and McCarty's failure to identify the economic or other special interest of the Foundation, it's sole major funder of \$50,000 or more in it's name".

Why the hell not? This really went to the heart of my complaint and deserved investigation and consideration by the Ruth Yang and the Enforcement Division.

The Foundation and the Committee were "thick as thieves" during the campaign.

I find it significant that Ruth Yang was the counsel for both investigations, she failed to connect the dots and enforce the FPPC regulations vigorously.

Measure E was the most expensive campaign ever in the Santa Clarita Valley. A fine of \$5,500 is not adequate in light of the egregious behavior of the COC Foundation and the Yes on Measure E Committee. The Foundation should disclose the source of the funds to the Funds for the Future Campaign used for the contributions.

I hope to provide public comment at your July 16 meeting of the commissioners and I wanted to provide you with advance background and perspective .

Respectfully,
Stephen C Petzold
Complainant
Open Government Advocate

[Quoted text hidden]