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8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
9 STATE OF CALIFORNIA
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11 In the Matter of

12 MARGARET SALAZAR,

13 Respondent.

FPPC Case No. 13/235

14 DEFAULT DECISION AND ORDER

(Gov. Code, §§ 11506 and 11520)

15 Complainant, the Enforcement Division of the Fair Political Practices Commission, hereby
16 submits this Default Decision and Order for consideration at its next regularly scheduled meeting.

17 Respondent Margaret Salazar has chosen to waive her rights to a probable cause conference and
18 administrative hearing—under the Political Reform Act, Administrative Procedure Act, and all other
19 relevant laws—so that this matter may be resolved as a Default Decision and Order. (A true and correct
20 copy of Respondent’s written waiver in this regard is attached to the supporting declaration of Neal
21 Bucknell as Exhibit A-1.)

22 In this case, Respondent violated the Political Reform Act as described in Exhibit 1 and in the
23 supporting declaration of Ann Flaherty (both of which are incorporated herein by reference). Exhibit 1 is
24 a true and accurate summary of the law and evidence in this matter.

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EXHIBIT 1

INTRODUCTION

This case arose from an audit conducted by the California State Auditor, Bureau of State Audits. The audit encompassed several local and regional migrant education programs, including the migrant education program administered by the San Joaquin County Office of Education and overseen by the California Department of Education.

At all relevant times (July 2009 through November 2011), Margaret Salazar was the Regional Director of this particular migrant education program. In this capacity, on numerous occasions, she directed substantial program funds for catering and janitorial services to two different vendors in which she had an economic interest. One of the vendors was Los Adobes Taqueria, which she owned and operated. The other vendor was Express Carpet Cleaning and Maintenance, which was owned by her then-husband, Ubaldo Rodriguez.

Under the conflict of interest provisions of the Political Reform Act (the "Act")¹, public officials, including employees of local government agencies, are prohibited from making, participating in making, or attempting to use their official positions to influence any governmental decisions in which they have a financial interest. This case involves several such conflicts of interest by Salazar.

WAIVER OF RIGHTS

Salazar has been informed as to the nature of the charges set forth herein. Also, she has been provided with an opportunity to consult with a private attorney regarding her rights to a probable cause conference and an administrative hearing under the Political Reform Act, the Administrative Procedure Act, and all other relevant laws. However, she has agreed to waive these rights, and she is aware that by doing so, the Enforcement Division will proceed with this default recommendation to the Commission. She understands the Commission can accept, reject, or change the recommended penalty. A true and correct copy of Salazar's written waiver is attached to the supporting declaration of Neal Bucknell as Exhibit A-1.

NATURE OF DEFAULT PROCEEDINGS

In this situation, where Salazar has waived her rights to a probable cause conference and an administrative hearing, the Commission may take action based upon her express admissions or upon other evidence, and affidavits may be used as evidence without any notice to her.²

¹ The Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² Section 11520, subd. (a).

SUMMARY OF THE LAW

All statutory/regulatory references and discussions of law pertain to the Act's provisions as they existed at the time of the violations in question—from July 2009 through November 2011.

Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

When the Political Reform Act was enacted, the people of the state of California found and declared that previous laws regulating political practices suffered from inadequate enforcement by state and local authorities.³ To that end, Section 81003 requires that the Act be liberally construed to achieve its purposes.

One of the purposes of the Act is to ensure that public officials are disqualified from certain matters in order that conflicts of interest may be avoided.⁴ Another purpose of the Act is to provide adequate enforcement mechanisms so that the Act will be “vigorously enforced.”⁵

Conflicts of Interest

The primary purpose of the conflict-of-interest provisions of the Act is to ensure that, “public officials, whether elected or appointed, perform their duties in an impartial manner, free from bias caused by their own financial interests or the financial interests of persons who have supported them.”⁶

In furtherance of this goal, Section 87100 prohibits a public official from making, participating in making, or in any way attempting to use his or her official position to influence a governmental decision in which the official knows, or has reason to know, that he or she has a financial interest. Under Section 87103, a public official has a financial interest in a decision if it is reasonably foreseeable that the decision will have a material financial effect on an economic interest of the official. For purposes of Sections 87100 and 87103, there are six steps to consider when determining whether an individual has a conflict-of-interest in a governmental decision.⁷

First, the individual must be a public official.⁸ Section 82048 defines “public official” to include an employee of a local government agency.

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³ Section 81001, subd. (h).

⁴ Section 81002, subd. (c).

⁵ Section 81002, subd. (f).

⁶ Section 81001, subd. (b).

⁷ The two additional steps of the analysis—whether the financial effect is indistinguishable from the effect on the public generally and whether the official's participation was legally required—are not applicable to this case.

⁸ Section 87100.

Second, the official must make, participate in making, or attempt to use his or her official position to influence a governmental decision.⁹

Third, the official must have an economic interest that may be financially affected by the governmental decision.¹⁰ Such interests include any business entity for which the official is a director, officer, partner, trustee, employee, or holds any position of management—and any business entity in which the official has a direct or indirect investment worth \$2,000 or more.¹¹ Indirect investment includes any investment owned by the spouse of a public official.¹² (For purposes of determining whether an investment is worth \$2,000 or more, fair market value is used.¹³) In case of divorce, irrespective of separation, an official continues to have an economic interest in his or her estranged spouse’s business until such time as dissolution proceedings are final.¹⁴ (This rule is particularly reasonable where the couple continues to live together, continues to share expenses, and continues to hold joint assets while dissolution proceedings are pending.)

Fourth, it must be determined if the economic interest of the official is directly or indirectly involved in the decision.¹⁵

Fifth, it must be determined if the governmental decision has a material financial effect on the economic interest.¹⁶ In the case of an economic interest that is a directly involved, small business entity (not listed in the Fortune 500 or on the New York Stock Exchange), the financial effect is presumed to be material.¹⁷

Sixth, at the time of the governmental decision, it must have been reasonably foreseeable that the decision would have a material financial effect.¹⁸ A material financial effect on an economic interest is reasonably foreseeable if it is substantially likely that one or more of the materiality standards applicable to the economic interest will be met as a result of the governmental decision.¹⁹ Whether the financial consequences of a decision are “reasonably foreseeable” at the time of a governmental decision depends upon the facts of each particular case.²⁰

⁹ Section 87100 and Regulation 18700.

¹⁰ Sections 87100, 87103; and Regulations 18700, et seq.

¹¹ Section 87103, subs. (a) and (d).

¹² See the last paragraph of Section 87103.

¹³ See Section 82034, which provides that an asset shall not be deemed an investment unless its fair market value is \$2,000 or more.

¹⁴ See *Lindgren Advice Letter*, No. A-03-065; and *Mattas Advice Letter*, No. A-01-290.

¹⁵ Regulation 18704.

¹⁶ Sections 87100 and 87103.

¹⁷ Regulation 18705.1, subd. (b).

¹⁸ Sections 87100 and 87103.

¹⁹ Regulation 18706, subd. (a).

²⁰ Regulation 18706, subd. (b).

SUMMARY OF THE FACTS

As stated above, at all relevant times (July 2009 through November 2011), Margaret Salazar was the Regional Director of the migrant education program administered by the San Joaquin County Office of Education (SJCOE) and overseen by the California Department of Education.

In this capacity, on numerous occasions, she directed substantial program funds for catering and janitorial services to two different vendors in which she had an economic interest. One of the vendors was Los Adobes Taqueria, which she owned and operated. The other vendor was Express Carpet Cleaning and Maintenance, which was owned by her then-husband, Ubaldo Rodriguez.

Around the same time, Salazar and her husband were going through a divorce. They were married in 1992, but in June 2008, she filed for divorce. Judgment for dissolution of the marriage was entered in March 2011. However, when interviewed, Salazar said she thought the divorce was not final until March 2012 because her husband would not sign the papers. For part of the time that the divorce was pending, Salazar and her husband continued to live together and share expenses. Also, in November 2011 and March 2012, Salazar and Rodriguez filed for bankruptcy as a married couple. Filings indicate that they jointly shared certain assets, including four vehicles and three bank accounts.

When Salazar made the governmental decisions to direct program funds to her taqueria and to her husband's carpet cleaning business, she was a public official because she was an employee of a local government agency.

She directed the program funds by exercising governmental approval/decision-making authority as the program director—which is documented by numerous purchase orders, purchase order request forms, purchase order revision requests, purchase order increase approvals, emails, contracts, and addendums. This amounted to several instances of making, participating in making, and using her official position to influence a governmental decision (as described in more detail below).

At the time, Los Adobes Taqueria was one of her economic interests because she owned and operated it.²¹

Also, at the time, Express Carpet Cleaning and Maintenance was one of her economic interests because it was her husband's business, and it had a fair market value of \$2,000 or more.²² It remained one of her economic interests until the judgment for dissolution of the marriage was entered in March 2011.²³

²¹ See Section 87103, subd. (d).

²² See the last paragraph of Section 87103, as well as subd. (a). Also, see Section 82034.

²³ See *Lindgren Advice Letter*, No. A-03-065; and *Mattas Advice Letter*, No. A-01-290.

Facts indicating that the business had a fair market value of \$2,000 or more include the following:

- ❖ Salazar stated in June 2014 that Rodriguez’s carpet cleaning business had been in business for about 12 years.
- ❖ Contracts between SJCOE and Express Carpet Cleaning indicate that Rodriguez, as the contractor, was responsible for furnishing the equipment needed to effectively perform his duties. The required equipment was identified as vacuum cleaners, a floor buffing/stripping machine, a wet/dry vacuum, and a hot water or steam extraction carpet shampoo/cleaner machine.
- ❖ The final divorce judgment awarded a 1995 cargo van along with a trailer containing a carpet cleaning machine to Rodriguez.
- ❖ The 2011 and 2012 bankruptcy filings report the cargo van as being worth \$1,500 and the carpet cleaning equipment as being worth \$2,000.
- ❖ For 2009, 2010, and 2011, the average income received by Rodriguez DBA Express Carpet Cleaning from SJCOE was in excess of \$38,000 per year.

Both economic interests were directly involved with the governmental decisions in question because the decisions involved whether to pay—and how much to pay—Salazar’s taqueria and her husband’s carpet cleaning business. The financial effect of Salazar’s decisions on the economic interests is presumed to be material because the interests were directly involved.²⁴ Also, the financial effect was reasonably foreseeable because Salazar’s decisions specifically involved payments to her own economic interests.

Counts 1-7: Conflicts of Interest as to Express Carpet Cleaning and Maintenance

According to Salazar, her husband’s business received the janitorial contract with SJCOE after there were complaints about the work the other janitorial company was doing—and after she talked to her supervisor about using her husband’s business. Also, she stated that no request for janitorial bids was posted and that the Assistant Superintendent of Operations made the final approval of the contract.

In its report, the Bureau of State Audits noted that the janitorial contract with Salazar’s husband did not appear to have been awarded using a competitive bidding process. Rather, an informal analysis—essentially done by Salazar—was the basis for the award. Also, it was noted that Salazar regularly approved rate increases for her husband’s business, analyzed and rejected at least one other vendor’s proposal, and replaced at least one former janitorial contract with a more expensive contract with her then-husband’s company.

Express Carpet Cleaning first started working for SJCOE under contract in approximately February 2008. The Act’s five-year statute of limitations for administrative prosecution reaches

²⁴ Regulation 18705.1, subd. (b).

as far back as June 2009 (after taking into account a tolling agreement that Salazar voluntarily entered into with the Enforcement Division). Also, as discussed above, the carpet cleaning business ceased being an economic interest to Salazar as of March 2011—when judgment for dissolution of her marriage was entered. For these reasons, the actionable time period for conflicts of interest involving the carpet cleaning business spans June 2009 through March 2011, and Salazar is being charged as follows:

Count 1

On or about July 9, 2009, Salazar approved a contract for janitorial services with her husband's business for the migrant education Stockton office facility. Her approval included multiple signatures where she signed off as project manager and as director. The contract was in the amount of \$6,000 (to be broken down into monthly payments) for fiscal year 2009-2010.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 2

On or about July 23, 2009, Salazar approved a contract for janitorial services with her husband's business for a migrant education Lodi facility. Her approval included multiple signatures where she signed off as project manager. The contract was in the amount of \$8,250 (to be broken down into monthly payments) for fiscal year 2009-2010.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 3

On or about August 17, 2009, Salazar approved a contract for janitorial services with her husband's business for two different migrant labor camps in French Camp, California. Her approval included multiple signatures where she signed off as project manager. The contract was in the amount of \$16,200 (to be broken down into monthly payments) for fiscal year 2009-2010.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 4

Also on or about August 17, 2009, Salazar approved a contract for janitorial services with her husband's business for another Lodi facility. Her approval included multiple signatures where she signed off as project manager. The contract was in the amount of \$15,000 (to be broken down into monthly payments) for fiscal year 2009-2010.

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In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 5

During the period of time from November 2009 through January 2010, Salazar approved several forms authorizing additional payments to her husband's business, including a purchase order increase approval form, purchase order revision request forms, and an addendum/revision form for consultant services. Her approvals included multiple signatures as director/project manager. The net effect of these approvals was to increase the amount of the contract described in Count 3 from \$16,200 to \$17,325.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 6

In November and December 2009, Salazar approved multiple forms authorizing additional payments to her husband's business, including a purchase order revision request form and an addendum/revision form for consultant services. Her approvals included multiple signatures as director/project manager. The net effect of these approvals was to increase the amount of the contract described in Count 4 from \$15,000 to \$15,750.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 7

On or about July 26, 2010, Salazar renewed the contracts described in Counts 1 through 4 by entering into a new contract for fiscal year 2010-2011. Her approval included multiple signatures where she signed off as project manager. The new contract was in the approximate amount of \$48,508.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Counts 8-10: Conflicts of Interest as to Los Adobes Taqueria

Salazar owned and operated Los Adobes Taqueria—beginning September 2, 2011. When interviewed, she stated that the migrant education program routinely used restaurants to provide catering. She stated that she felt her taqueria could provide the same amount of food for less money. There was no contract with her taqueria, and no selection process. All she needed to do was submit a request for a purchase order in her official capacity, which she did on three occasions. (Also, pursuant to these purchase orders, she acknowledged submitting 17 invoices from Los Adobes Taqueria to her agency, which she herself prepared and sent. Additionally, she

acknowledged receiving six checks from her agency, made out to Los Adobes Taqueria, which she deposited into her bank account. These checks totaled approximately \$5,035.) These three separate requests for purchase orders are charged as follows:

Count 8

On or about October 3, 2011, Salazar, acting in her official capacity as Regional Director, requested a purchase order in the amount of \$3,000 from her agency. The vendor identified in the purchase order was her own business, Los Adobes Taqueria.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 9

On or about November 2, 2011, Salazar, acting in her official capacity as Regional Director, requested a purchase order in the amount of \$5,000 from her agency. The vendor identified in the purchase order was her own business, Los Adobes Taqueria.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Count 10

On or about November 17, 2011, Salazar, acting in her official capacity as Regional Director, requested a purchase order in the amount of \$1,500 from her agency. The vendor identified in the purchase order was her own business, Los Adobes Taqueria.

In this way, Salazar violated Section 87100, which prohibits conflicts of interest by public officials.

Additional Facts

In its report, the Bureau of State Audits noted that the per-meal food costs associated with the catering services were reasonable. However, it also noted that:

Under the previous janitorial services contracts—the ones that the former regional director approved for her then-husband’s company—San Joaquin paid roughly \$4,600 for two-days-a-week cleaning during peak months and approximately \$2,600 for one-day-a-week cleaning during off-peak months. . . . Under the new janitorial services contract, which began in January 2012 and provides for essentially the same service for the same locations, the migrant program pays approximately \$1,000 during peak months and \$600 in off-peak months. Even without a conflict of interest,

these results cast doubt on whether the costs associated with the previous janitorial services contract were reasonable.

Additionally, it was noted that:

The deputy superintendent overseeing San Joaquin’s migrant program explained that they did not seek prosecution or repayment because they did not believe that the former regional director was trying to defraud the program; in his words, the individual “just made a series of incredibly bad judgments.” Further, management and legal counsel at San Joaquin considered the probability of actually recovering funds to be low and not worth the cost of pursuing further action. Instead, they believed the correct approach was to speedily end the former regional director’s tenure at San Joaquin under a separation agreement that she would actually sign.

PROPOSED PENALTY

This matter consists of ten counts of violating the Act, which carry a maximum administrative penalty of \$5,000 per count—for a total maximum penalty of \$50,000.²⁵

In determining the appropriate penalty for a particular violation of the Act, the Commission considers the facts of the case, the public harm involved, and the purposes of the Act. Also, the Commission considers factors such as: (a) the seriousness of the violation; (b) the presence or absence of any intention to conceal, deceive or mislead; (c) whether the violation was deliberate, negligent or inadvertent; (d) whether the violation was isolated or part of a pattern; and (e) whether the violator has a prior record of violations.²⁶ Additionally, the Commission considers penalties in prior cases with similar violations.

Regarding Counts 1 through 10, making a governmental decision in which an official has a financial interest is a serious violation of the Act. It undermines public trust in government by creating the appearance that the decision was the product of a conflict of interest. Also, such conduct contradicts the Act’s decree that government should serve the needs of all citizens equally, in an impartial manner—without regard to wealth or financial interests.²⁷

The most recent default decision involving this type of violation imposed a penalty in the high range. See *In the Matter of John Martin*, FPPC No. 14/426 (approved Feb. 19, 2015), where a penalty in the amount of \$4,000 was imposed against a city councilman for a vote involving a conflict of interest. The current case warrants a similarly high penalty. Salazar knew or should have known that she had a conflict of interest with respect to her own taqueria and her husband’s

²⁵ Section 83116, subd. (c).

²⁶ Regulation 18361.5, subd. (d).

²⁷ Section 81001, subs. (a) and (b).

carpet cleaning business. This was more than an inadvertent oversight. These violations amounted to a repeated pattern over a period of time spanning more than two years. During this time, there was ample opportunity for Salazar to reflect and realize that she was violating the law.

A higher penalty is not being sought because Salazar cooperated with the Enforcement Division by waiving her rights to allow this matter to proceed as a default. Also, she voluntarily agreed to a tolling agreement as to the statute of limitations to allow further time for investigation and settlement discussions. Additionally, she does not have a prior record of violating the Act.

CONCLUSION

Under these circumstances, it is respectfully submitted that imposition of a penalty against Margaret Salazar in the amount of \$4,000 per count for Counts 1 through 10 is justified—for a total penalty in the amount of \$40,000.

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12 MARGARET SALAZAR,

13 Respondent.

FPPC Case No. 13/235

DECLARATION OF NEAL BUCKNELL IN
SUPPORT OF DEFAULT DECISION AND
ORDER

(Gov. Code, §§ 11506 and 11520)

14
15 I, Neal Bucknell, declare as follows:

16 1. I am employed by, and I represent the Fair Political Practices Commission
17 (“Commission”) in my capacity as Senior Commission Counsel for the Enforcement Division. My
18 business address is 428 J Street, Suite 620, Sacramento, California.

19 2. I am the attorney assigned to this case. If called as a witness, I competently could and
20 would testify to the following, which is based upon my own personal knowledge.

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EXHIBIT A-1



**FAIR POLITICAL PRACTICES COMMISSION
ENFORCEMENT DIVISION**

**WAIVER OF RIGHT TO PROBABLE CAUSE
HEARING AND ADMINISTRATIVE HEARING**

FPPC Case No. 13/235

I, the undersigned, have been provided with an opportunity to consult an attorney of my choosing. I understand my rights to a probable cause hearing and administrative hearing under the Political Reform Act, the Administrative Procedure Act, and all other relevant laws.

I hereby waive my rights to a probable cause hearing and administrative hearing. In so doing, I understand and agree that:

- a. This case will proceed to the Fair Political Practices Commission (“Commission”) as a default recommendation by the Enforcement Division, and I waive the 15-day notice requirement for defaults.
- b. The default recommendation by the Enforcement Division will be for 10 administrative counts under Government Code section 87100 with a recommended penalty of \$4,000 per count—for a total of \$40,000.
- c. The Enforcement Division will place this case on the agenda for the next scheduled public meeting of the Commission for its consideration.
- d. Any unpaid portion of the fine imposed against me by the Commission will go through a collections process.

I understand that the Commission will be presented with the proposed default recommendation, and it has the discretion to modify counts and increase or decrease the proposed penalty based on the evidence. Adoption of a default decision is contingent on its passage by a majority of the members of the Commission and will be the final Decision and Order in this case.

Dated: _____

Margaret Salazar, Respondent

EXHIBIT A-2

TOLLING AGREEMENT
FPPC Case No. 13/235

I, Margaret Salazar-Huerta, understand that I am being investigated by the Enforcement Division of the Fair Political Practices Commission for potential violations of the Political Reform Act—including, but not limited to, potential conflicts of interest. In order to allow time for further evaluation of this matter and meaningful settlement discussions, I agree to toll any statute of limitations that might be applicable, including but not limited to Government Code sections 91000.5 and 91011.

I have been afforded an opportunity to consult with a private attorney of my choosing. By entering into this tolling agreement, I am not waiving any claims, rights, or defenses that may have accrued prior to the effective date of this tolling agreement.

This tolling agreement shall be effective starting June 17, 2014. Thereafter, this agreement may be terminated by me at any time with 30 days' written notice to the Enforcement Division of the Fair Political Practices Commission—with the understanding that the notice must be conveyed via certified mail, return receipt requested.

A fax or .pdf copy of this executed agreement shall be as effective/binding as the original.

Dated: _____

Margaret Salazar-Huerta

1 GALENA WEST
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2 NEAL BUCKNELL
Senior Commission Counsel
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11 In the Matter of

12 MARGARET SALAZAR,

13 Respondent.

FPPC Case No. 13/235

DECLARATION OF ANN FLAHERTY IN
SUPPORT OF DEFAULT DECISION AND
ORDER

(Gov. Code, §§ 11506 and 11520)

14
15 I, Ann Flaherty, declare as follows:

16 1. I am a Special Investigator for the Enforcement Division of the Fair Political Practices
17 Commission. My business address is 428 J Street, Suite 620, Sacramento, California.

18 2. I am the investigator assigned to this case. If called as a witness, I competently could and
19 would testify to the following, which is based upon my own personal knowledge and upon my
20 investigation.

21 3. As part of my investigation, I obtained and reviewed various documents, including
22 records from the San Joaquin County Office of Education, court filings regarding Margaret Salazar's
23 divorce, bankruptcy filings that she and her husband filed, and other pertinent business/financial records.

24 Also, my investigation included interviews of material witnesses.

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