



FAIR POLITICAL PRACTICES COMMISSION

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September 8, 2015

Katherine Hartley
Housing Authority of the
County of San Bernardino

FPPC File No. 15/043; Steve PonTell, Respondent

Dear Ms. Hartley:

On January 16, 2015, we received a Statement of Economic Interests ("SEI") non-filer referral from you on Steve PonTell, the Chief Executive Officer ("CEO") with the National Community Renaissance of California. The National Community Renaissance of California ("NCRC") provides consultant services to the Housing Authority of the County of San Bernardino ("Housing Authority").

The Conflict of Interest Code for the Housing Authority designates the NCRC as a consultant within its conflict of interest code. When we submitted our nonfiler communication to Mr. PonTell, we received a telephone call from the general counsel at NCRC who stated that Mr. PonTell is not the individual within the NCRC who is working the contract on behalf of the Housing Authority. In fact, in your communication to NCRC you acknowledge that the filing of the Form 700 is a personal declaration to be completed by the person handling the Housing Authority contract.

Mr. PonTell as the CEO for NCRC is not one of the principals providing the consulting services to the Housing Authority.

In an April 22, 2015 email to you, we requested you revisit this issue and provide information concerning the specific employees within NCRC who are providing consultant services to the Housing Authority. We received no response to that email. Since it does not appear that the Housing Authority ever identified the actual principals working the contract, and those persons did not receive notice of their filing obligations, we have closed our file on this matter.

Should you have any questions regarding this letter, please feel free to contact Jeanette Turvill at [REDACTED].

Sincerely,

[REDACTED]
Galena West
Chief, Enforcement Division

GW/jt

