

Sasha Linker

From: Stephen Petzold [REDACTED]
Sent: Thursday, March 07, 2024 10:12 AM
To: CommAsst
Subject: Form 700 COI Form for members of Citizen Bond Oversight Committees Prop 39 Bonds

Follow Up Flag: Follow up
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EXTERNAL EMAIL

I believe it is important for the FPPC to issue a ruling that the duties assigned to CBOCs in the Education Code 15278-15282 necessitate a local agency to place members in the COI codes for the local agency.

Steve Petzold
[REDACTED]

Sasha Linker

From: Stephen Petzold [REDACTED]
Sent: Thursday, March 07, 2024 10:15 AM
To: CommAsst
Subject: Fwd: Form 700 for Members of CBOCs in Los Angeles County

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EXTERNAL EMAIL

Steve Petzold
[REDACTED]

----- Forwarded message -----

From: Nazarian, Panik <PNazarian@bos.lacounty.gov>
Date: Tue, Jan 23, 2024 at 1:31 PM
Subject: RE: Form 700 for Members of CBOCs in Los Angeles County
To: Stephen Petzold [REDACTED]
CC: Thomas Rubin [REDACTED]

Hi Stephen,

Short answer: it depends. Read on for more detail:

We have some school districts that have their CBOC designated on their code, but we also have plenty that do not. Initially when the law passed, the consensus was to add this position to all the school district codes. However, as time went by, many schools realized that their CBOC was not a decision-making committee, and slowly began removing the position from their code. So far I've found that Basset Unified still has theirs, but nothing for Burbank or Castaic. Feel free to check other school codes here if it helps: [COI Agency Codes \(lacounty.gov\)](https://www.lacounty.gov/COI/AgencyCodes)

The question is, does the specific CBOC exercise decision-making authority, or at least influence the final decision makers on decisions that impact the public funds allocated to the agency, or do they merely work on creating progress reports (or other ministerial tasks) that aren't necessarily made to sway decisions one way or another.

- If they are final decision-makers (compel an agency to spend funds, or stop spending funds, assign priority to a project, etc.) then they should be added to the COI code.
- If they are participating in final decisions, such as making recommendations in their reports to final decision-makers about governmental decisions, they should also be added to the COI Code.
- Lastly, if it's unclear whether they do or not fall within the two points above, the agency can submit the request to add, and the COI Division and the Code Review Panel can advise further. What we'll look at is whether there is participation in governmental decisions, and if there's a track record of recommendations by the CBOC being carried out without significant review or revision. If such track record exists, we'll most likely agree with adding them on, and vice versa.

Hope this helps. Let me know if I can assist further.

-Panik Nazarian

213-893-1151

From: Stephen Petzold [REDACTED]
Sent: Tuesday, January 23, 2024 12:12 PM
To: Nazarian, Panik <PNazarian@bos.lacounty.gov>
Cc: Thomas Rubin [REDACTED]
Subject: Form 700 for Members of CBOCs in Los Angeles County

CAUTION: External Email. Proceed Responsibly.

Panik,

Will you please help me settle a bar bet?

Are members of Citizens Bond Oversight Committees, required to file Form 700 in Los Angeles County ?

CBOCs are required under CA Education Code 15264-15282 when bonds are issued subject to Proposition 39.

Let me know if you have any questions.

Thank you

Steve Petzold

