



June 12, 2015

Mr. Chris Jicha, Secretary & Staff to Designated Local Authority
City of Santa Paula Designated Local Authority
865 South Figueroa Street, 35th Floor
Los Angeles, CA 90017

Dear Mr. Jicha:

Subject: Other Funds and Accounts Due Diligence Review

The City of Santa Paula Designated Local Authority Successor Agency (Agency) submitted an oversight board approved Other Funds and Accounts (OFA) Due Diligence Review (DDR) to the California Department of Finance (Finance) on January 15, 2015. The purpose of the review was to determine the amount of cash and cash equivalents available for distribution to the affected taxing entities. Since the Agency did not meet the January 15, 2013 submittal deadline pursuant to HSC section 34179.6 (c), Finance is not bound to completing its review and making a determination by the April 1, 2013 deadline pursuant to HSC section 34179.6 (d). However, Finance has completed its review of your DDR, which may have included obtaining clarification for various items.

HSC section 34179.6 (d) authorizes Finance to adjust the DDR's stated balance of OFA available for distribution to the taxing entities. Based on our review of your DDR, the following adjustments were made:

- Total assets were overstated by \$1,414,235. Our review of the Agency's accounting records indicates that total cash held as of June 30, 2012 included \$1,414,235 of Low-Moderate Income Housing Funds (LMIHF). Finance adjusted the LMIHF DDR to remit this amount to the County Auditor-Controller. Therefore, this amount should not to be included in the OFA total assets held by the Agency as of June 30, 2012. Therefore, the balance has been adjusted by \$1,414,235.
- Transfers totaling \$41,000 were not for enforceable obligations. The Agency reported two transfers to the City of Santa Paula (City) as "Monthly transfers for Museum operations" totaling \$41,000. The Agency was not able to provide supporting documentation demonstrating that former redevelopment agency had an obligation to make these monthly payments to the City of Santa Paula. Finance's requested the Museum Lease Agreement on multiple occasions, but the Agency could not provide the documents. Therefore, the balance has been adjusted by \$41,000.

If you disagree with Finance's adjusted amount of OFA balances available for distribution to the taxing entities, you may request a Meet and Confer within five business days of the date of this letter. The Meet and Confer process and guidelines are available at Finance's website below:

http://www.dof.ca.gov/redevelopment/meet_and_confer/

The Agency's OFA balance available for distribution to the affected taxing entities is \$42,031 (see table below).

OFA Balances Available For Distribution To Taxing Entities	
Available Balance per DDR:	\$ 1,415,266
Finance Adjustments	
Balances transferred to the City	\$ 41,000
Adjustment to cash for LMIHF balance	\$ (1,414,235)
Total OFA available to be distributed:	\$ 42,031

Absent a Meet and Confer request, HSC section 34179.6 (f) requires successor agencies to transmit to the county auditor-controller the amount of funds identified in the above table within five working days, plus any interest those sums accumulated while in the possession of the recipient. Upon submission of payment, please provide proof of payment to Finance within five business days.

If funds identified for transmission are in the possession of the successor agency, and if the successor agency is operated by the city or county that created the former redevelopment agency, then failure to transmit the identified funds may result in offsets to the city's or the county's sales and use tax allocation, as well as its property tax allocation. If funds identified for transmission are in the possession of another taxing entity, the successor agency is required to take diligent efforts to recover such funds. A failure to recover and remit those funds may result in offsets to the other taxing entity's sales and use tax allocation or to its property tax allocation. If funds identified for transmission are in the possession of a private entity, HSC 34179.6 (h) (1) (B) states that any remittance related to unallowable transfers to a private party may also be subject to a 10 percent penalty if not remitted within 60 days.

Failure to transmit the identified funds will also prevent the Agency from being able to receive a finding of completion from Finance. Without a finding of completion, the Agency will be unable to take advantage of the provisions detailed in HSC section 34191.4. Specifically, these provisions allow certain loan agreements between the former redevelopment agency (RDA) and the city, county, or city and county that created the RDA to be considered enforceable obligations. These provisions also allow certain bond proceeds to be used for the purposes in which they were sold and allows for the transfer of real property and interests into the Community Redevelopment Property Trust Fund once Finance approves the Agency's long-range property management plan.

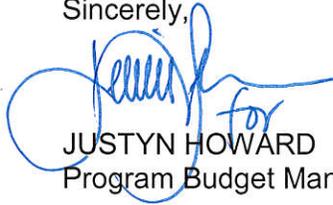
In addition to the consequences above, willful failure to return assets that were deemed an unallowable transfer or failure to remit the funds identified above could expose certain individuals to criminal penalties under existing law.

Pursuant to HSC section 34167.5, the California State Controller's Office (Controller) has the authority to claw back assets that were inappropriately transferred to the city, county, or any other public agency. Determinations outlined in this letter do not in any way eliminate the Controller's authority.

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Please direct inquiries to Beliz Chappuie, Supervisor or Satveer Ark, Lead Analyst at
(916) 445-1546.

Sincerely,



JUSTYN HOWARD
Program Budget Manager

cc: Ms. Sandy Easley, Treasurer, Designated Local Authority, City of Santa Paula
Designated Local Authority
Ms. Rhoda Farrell, Property Tax Fiscal Manager, Ventura County
California State Controller's Office