



May 16, 2014

Ms. Margarita Cruz, Redevelopment Manager  
City of Inglewood  
One Manchester Boulevard  
Inglewood, CA 90301

Dear Ms. Cruz:

Subject: Recognized Obligation Payment Schedule

This letter supersedes the California Department of Finance's (Finance) Recognized Obligation Payment Schedule (ROPS) letter dated April 9, 2014. Pursuant to Health and Safety Code (HSC) section 34177 (m), the City of Inglewood Successor Agency (Agency) submitted a Recognized Obligation Payment Schedule (ROPS 14-15A) to Finance on February 27, 2014, for the period of July through December 2014. Finance issued a ROPS determination letter on April 9, 2014. Subsequently, the Agency requested a Meet and Confer session on one or more of the items denied by Finance. The Meet and Confer session was held on April 28, 2014.

Based on a review of additional information and documentation provided to Finance during the Meet and Confer process, Finance has completed its review of the specific items being disputed.

- Item No. 113 – Housing Administrative cost allowance pursuant to AB 471 in the amount of \$75,000. Finance continues to deny this item. Finance denied this item because pursuant to HSC section 34171 (p), the housing entity administrative cost allowance is applicable only in cases where the city, county, or city and county that authorized the creation of the redevelopment agency (RDA) elected to not assume the housing functions. Because the housing entity to the former redevelopment agency of the City of Inglewood (City) is the City-formed Housing Authority (Authority), the Authority operates under the control of the City and is considered the City under Dissolution Law (ABx1 26 and AB 1484).

The Agency contends that the City elected not to retain the housing functions, but the Authority, as a separate legal entity from the City, did elect to retain the housing functions pursuant to HSC section 34176 (b) (3) and should therefore be eligible for the housing entity administrative allowance. However, pursuant to HSC section 34167.10 (a), the definition of "city" includes, but is not limited to, any reporting entity of the city for purposes of its comprehensive annual financial report (CAFR), any component unit of the city, or any entity controlled by the city or for which the city is financially responsible or accountable. HSC section 34167.10 (a) defines "city" for purposes of all of Dissolution Law, which includes HSC section 34171, as amended by AB 471, and HSC section 34176. The Authority is included in the City's CAFR, which

identifies the Authority as a component unit of the City and states that the City is financially accountable for the component units.

Although the Authority is a separate legal entity from the City, HSC section 34167.10 (c) states that it shall not be relevant that the entity is formed as a separate legal entity. It should also be noted that HSC section 34167.10 (c) goes on to state that "the provisions of this section are declarative of existing law as the entities described herein are and were intended to be included within the requirements of this part [Part 1.8] and Part 1.85...and any attempt to determine otherwise would thwart the intent of these two parts." Therefore, based on our review, the City, by way of the Authority, elected to retain the housing functions pursuant to HSC section 34176 (a) and is not eligible for \$75,000 of housing entity administrative allowance.

- Item No. 114 – Voter Approved Pension Tax Revenues in the amount of \$2,749,202 is not an enforceable obligation. Finance continues to deny this item. The Agency provided a City Ordinance and Resolution; however, Finance denied this item because these documents do not appear to obligate the former RDA or Agency. During the Meet and Confer process, the Agency contended that the Voter-Approved Pension Tax Revenues is an enforceable obligation pursuant to HSC section 34171 (d) (1) (C) as a pre-existing obligation under California law. However, the Agency has not provided any documents to show that this is an obligation pursuant to the cited section or that any other enforceable obligation exists that requires the payment of these revenues to the City on the ROPS. Additionally, HSC section 34171 (d) (2) states that agreements, contracts, or arrangements between the city that created the RDA and the former RDA are not enforceable, unless issued within two years of the RDA's creation date or for issuance of indebtedness to third-party investors or bondholders. Therefore, this item is not an enforceable obligation and not eligible for funding from the Redevelopment Property Tax Trust Fund (RPTTF).

In addition, per Finance's letter dated April 9, 2014, we continue to deny the following items not contested by the Agency during the Meet and Confer:

- Item Nos. 2 and 18 – Although enforceable, auditing and business support service payments totaling \$37,000 are considered general administrative costs and have been reclassified.
- Item Nos. 107, 108, 109, and 111 – Project management costs for the KP Auto Center, Madison Square Garden, Locust Street Senior Center, and Century Boulevard Reconstruction projects totaling \$1,310,000 are not enforceable obligations. These projects were denied by Finance on previous ROPS; therefore, the associated management costs related to these projects are not considered enforceable obligations and not eligible for RPTTF funding on the ROPS.
- Item No. 110 – Project management cost for Hollywood Park Redevelopment in the amount of \$400,000. The Agency requested \$35,869 for the ROP 14-15A period, but provided documentation stating only \$10,973 is required for the period. Therefore, the \$24,896 excess is not an enforceable obligation and not eligible for RPTTF funding on this ROPS.

Pursuant to HSC section 34186 (a), successor agencies were required to report on the ROPS 14-15A form the estimated obligations and actual payments (prior period adjustments) associated with the July through December 2013 period. HSC section 34186 (a) also specifies prior period adjustments self-reported by successor agencies are subject to audit by the county auditor-controller (CAC) and the State Controller. The amount of RPTTF approved in the table below includes the prior period adjustment resulting from the CAC's audit of the Agency's self-reported prior period adjustment.

Except for the items denied in whole or in part as enforceable obligations, Finance is not objecting to the remaining items listed on your ROPS 14-15A. The Agency's maximum approved RPTTF distribution for the reporting period is \$10,929,899 as summarized below:

<b>Approved RPTTF Distribution For the period of July through December 2014</b>	
Total RPTTF requested for non-administrative obligations	13,896,115
Total RPTTF requested for administrative obligations	275,000
<b>Total RPTTF requested for obligations</b>	<b>\$ 14,171,115</b>
<b>Total RPTTF requested for non-administrative obligations</b>	<b>13,896,115</b>
<u>Denied Items</u>	
Item No. 107	(23,560)
Item No. 108	(32,744)
Item No. 109	(80,900)
Item No. 110	(24,896)
Item No. 111	(30,000)
Item No. 113	(75,000)
Item No. 114	(2,749,202)
	<u>(3,016,302)</u>
<u>Reclassified Items</u>	
Item No. 2	(7,000)
Item No. 18	(30,000)
	<u>(37,000)</u>
<b>Total RPTTF authorized for non-administrative obligations</b>	<b>\$ 10,842,813</b>
<b>Total RPTTF requested for administrative obligations</b>	<b>275,000</b>
<u>Reclassified Items</u>	
Item No. 2	7,000
Item No. 18	30,000
	<u>37,000</u>
<b>Total RPTTF authorized for administrative obligations</b>	<b>\$ 312,000</b>
<b>Total RPTTF authorized for obligations</b>	<b>\$ 11,154,813</b>
ROPS 13-14A prior period adjustment	(224,914)
<b>Total RPTTF approved for distribution</b>	<b>\$ 10,929,899</b>

Please refer to the ROPS 14-15A schedule that was used to calculate the approved RPTTF amount:

<http://www.dof.ca.gov/redevelopment/ROPS>

This is Finance's final determination related to the enforceable obligations reported on your ROPS for July 1 through December 31, 2014. This determination only applies to items where funding was requested for the six-month period. Finance's determination is effective for this time period only and should not be conclusively relied upon for future periods. All items listed on a future ROPS are subject to a subsequent review and may be denied even if it was or was not denied on this ROPS or a preceding ROPS. The only exception is for those items that have received a Final and Conclusive determination from Finance pursuant to HSC section 34177.5 (i). Finance's review of items that have received a Final and Conclusive determination is limited to confirming the scheduled payments as required by the obligation.

The amount available from the RPTTF is the same as the amount of property tax increment that was available prior to enactment of ABx1 26 and AB 1484. This amount is not and never was an unlimited funding source. Therefore, as a practical matter, the ability to fund the items on the ROPS with property tax is limited to the amount of funding available to the successor agency in the RPTTF.

To the extent proceeds from bonds issued after December 31, 2010 exist and are not encumbered by an enforceable obligation pursuant to HSC section 34171 (d), HSC section 34191.4 (c) (2) (B) requires these proceeds be used to defease the bonds or to purchase those same outstanding bonds on the open market for cancellation.

Please direct inquiries to Evelyn Suess, Dispute Resolution Supervisor, or Mary Halterman, Analyst, at (916) 445-1546.

Sincerely,



JUSTYN HOWARD  
Assistant Program Budget Manager

cc: Ms. Sharon Koike, Assistant Finance Director, City of Inglewood  
Ms. Kristina Burns, Manager, Department of Auditor-Controller, Los Angeles County  
California State Controller's Office