



May 15, 2015

Ms. Terry Cahoon, Assistant Finance Director  
City of Paramount  
16400 Colorado Avenue  
Paramount, CA 90723

Dear Ms. Cahoon:

Subject: Recognized Obligation Payment Schedule

This letter supersedes the California Department of Finance's (Finance) Recognized Obligation Payment Schedule (ROPS) letter dated April 06, 2015. Pursuant to Health and Safety Code (HSC) section 34177 (m), the City of Paramount Successor Agency (Agency) submitted a Recognized Obligation Payment Schedule (ROPS 15-16A) to Finance on February 27, 2015, or the period of July through December 2015. Finance issued a ROPS determination letter on April 06, 2015. Subsequently, the Agency requested a Meet and Confer session on one or more of the determinations made by Finance. The Meet and Confer session was held on April 22, 2015.

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 determinations being disputed.

- Item No. 27 – Falcon Fuels Owner Participation Agreement (OPA) in the amount of \$3,825,000. Finance continues to deny this item. During the Meet and Confer process, the Agency did not provide any additional documentation that supported this item is an enforceable obligation as defined in HSC section 34171 (d). Therefore, as previously determined the OPA dated February 1, 2011 states the former redevelopment agency's (RDA) obligations are to be paid from existing RDA funds and shall not be construed as a pledge of any other revenues of the former RDA. Therefore, this item is not an enforceable obligation and is not eligible for Redevelopment Property Tax Trust Fund (RPTTF) funding.
- Item Nos. 78 through 83 – Falcon Fuels OPA past payments from January 2012 through February 2015 totaling \$860,503. Finance continues to deny these items. During the Meet and Confer the Agency did not provide additional documentation to support this is an enforceable obligation as defined in HSC section 34171 (d). In addition, Finance notes that these items are requests for funds expended during various ROPS periods on items related to the Falcon Fuels OPA. However, those items were each denied by Finance during the respective ROPS periods. HSC section 34177 (a) (3) states that only those payments listed in the ROPS may be made by the Agency from the funds specified in the ROPS. Therefore, Item Nos. 78 through 83 totaling \$860,503 is not eligible for RPTTF funding.

In addition, per Finance's letter dated April 06, 2015, we continue to make the following determinations not contested by the Agency during the Meet and Confer:

In addition, Finance noted the following during our review:

- On the ROPS 14-15A Prior Period Adjustment worksheet, the Agency's expenditures exceeded Finance's authorization by \$10,100 for Item No. 77 – Bond Proceeds.

Per HSC section 34177 (a) (3), only those payments listed on ROPS may be made by the Agency from the funds specified on the ROPS. However, these items were determined to be enforceable obligations for the ROPS 15-16A period. Therefore, Finance is increasing the Agency's authorization for the ROPS 15-16A to ensure that authorization is consistent with expenditures for the approved enforceable obligations. As these Bond Proceeds were previously expended, the increase in authorization should not result in increased expenditures for the current ROPS period, but should merely allow the Agency to reconcile actual expenditures to the authorization.

HSC sections 34177 (a) (4) and 34173 (h) provide mechanisms when Agency payments must exceed the amounts authorized by Finance. Please ensure the proper expenditure authority is received from your Oversight Board and Finance prior to making payments on enforceable obligations.

Pursuant to HSC section 34186 (a), successor agencies were required to report on the ROPS 15-16A form the estimated obligations and actual payments (prior period adjustments) associated with the July through December 2014 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 approved in the table below includes the prior period adjustment resulting from the CAC's review of the Agency's self-reported prior period adjustment.

Except for the items denied in whole or in part, Finance is not objecting to the remaining items listed on your ROPS 15-16A.

The Agency's maximum approved RPTTF distribution for the reporting period is \$4,238,045 as summarized in the Approved RPTTF Distribution table below:

<b>Approved RPTTF Distribution</b>	
<b>For the period of July through December 2015</b>	
Total RPTTF requested for non-administrative obligations	5,292,615
Total RPTTF requested for administrative obligations	125,000
<b>Total RPTTF requested for obligations on ROPS</b>	<b>\$ 5,417,615</b>
<b>Total RPTTF requested for non-administrative obligations</b>	<b>5,292,615</b>
<b>Denied Items</b>	
Item No. 27	(170,000)
Item No. 78	(133,297)
Item No. 79	(150,006)
Item No. 80	(144,217)
Item No. 81	(134,664)
Item No. 82	(138,319)
Item No. 83	(160,000)
	(1,030,503)
<b>Total RPTTF authorized for non-administrative obligations</b>	<b>\$ 4,262,112</b>
<b>Total RPTTF requested for administrative obligations</b>	<b>125,000</b>
<b>Total RPTTF authorized for administrative obligations</b>	<b>\$ 125,000</b>
<b>Total RPTTF authorized for obligations</b>	<b>\$ 4,387,112</b>
ROPS 14-15A prior period adjustment	(149,067)
<b>Total RPTTF approved for distribution</b>	<b>\$ 4,238,045</b>

Please refer to the ROPS 15-16A 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, 2015. 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 the 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 agency in the RPTTF.

Pursuant to HSC section 34177 (a) (3), only those payments listed on an approved ROPS may be made by the successor agency from the funds specified in the ROPS. However, if the Agency needs to make payments for approved obligations from another funding source, HSC section 34177 (a) (4) requires the Agency to first obtain oversight board approval.

Ms. Terry Cahoon  
May 15, 2015  
Page 4

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 Danielle Brandon, Analyst, at (916) 445-3274.

Sincerely,



JUSTYN HOWARD  
Program Budget Manager

cc: Ms. Karina Lam, Finance Director, City of Paramount  
Ms. Kristina Burns, Manager, Department of Auditor-Controller, Los Angeles County  
California State Controller's Office