



REPORT OF THE LOS ANGELES COMMUNITY COLLEGE DISTRICT BOND PROGRAM MONITOR

**2025 Q1 Activities
January 1 – March 31, 2025**





**2025 First Quarterly Report of the Activities of Bond Program Monitor
(January 1 – March 31, 2025)**



**Affiliated Monitors, Inc.
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April 22, 2025

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Introduction

This report represents a high-level summary of activities undertaken by the Los Angeles Community College District’s (“LACCD” or “the District”) Bond Program Monitor (the “BPM”) during the first Quarter of 2025 (January 1 through March 31, 2025) (the “Quarter”). The BPM serves as the eyes and ears of the District’s stakeholders – the District Board of Trustees, the Chancellor, BuildLACCD, LACCD faculty, students and staff, contractors, consultants and the citizens of greater Los Angeles – to identify and respond to allegations of fraud, waste, and abuse, and/or violations of laws, regulations and rules occurring within the District’s Bond Construction Projects, and to help the District maintain the integrity of its public-funded Bond Program (“BP” or “the Program”), BuildLACCD and the projects it undertakes.

In monitoring for potential misconduct such as conflicts of interest, collusion, manipulation of bids, fraudulent billing, corruption, failing to pay prevailing wage, exploitation of labor, and other forms of fraud, waste, abuse and violations of laws and regulations, and District policies and rules, the Monitor has the power to take complaints from anyone with information about possible failures of integrity occurring within the greater Bond Construction Program and at any of the District’s nine college campuses. The Monitor does not hold enforcement power but rather provides recommendations for actions to the District. The BPM reports to the Chancellor and is focused solely on the Bond Program and is not tasked with monitoring the greater District. The role of the BPM is to function as an impartial inspector responsible for helping to ensure that the District’s multi-billion-dollar capital program funded by Propositions A, AA, J, CC and LA is performing with the utmost integrity.

On May 2, 2024, Affiliated Monitors, Inc. (“AMI”) was selected by the Los Angeles Community College District (“LACCD” or “the District”) to serve as the Interim BPM on a one-year contract. On



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April 2, 2025, the District Board of Trustees (“BoT”) approved the award of a one-year contract, renewable for a total of five years to AMI to continue to serve as the formal Bond Program Monitor.

For the past year, in the interim role, the BPM focus had been on establishing the requisite policies, procedures, infrastructure, systems and protocols that serve to underpin a robust and independent monitoring structure that can address the size and complexity of the District’s Bond Program; messaging the BPM hotline and complaint channels; educating stakeholders on the role of the BPM and how to contact the Monitor; reviewing, fielding and evaluating complaints; conducting investigations; and providing recommendations to the District with respect to identified gaps or possible improvements in controls related to the Bond Construction program. After standing up the nascent program, AMI has striven to mature the BPM monitoring program. The office of the BPM now regularly fields calls from concerned stakeholders; conducts investigations into allegations of fraud, waste and abuse in the Program; conducts trainings; liaises with counterparts; regularly attends District meetings; provides on-going advisement on responses to identified issues within the Program; and works collaboratively with District leaders and departments, including the Office of General Counsel, Contracts, Procurement, and Finance. AMI is proud to serve the District in this important role and will continue to work for continuous improvements that lead to the highest level of integrity in the Bond Program.



Executive Summary

During the period of January 1st through March 31, 2025 (“activity period” or the “Quarter”), the BPM has been investigating fourteen open matters; closed two investigations; and received four new complaints. The Monitor has continued to issue monthly updates to the District Chancellor; issued written reports to the Office of General Counsel (OGC); attended meetings with stakeholder groups such as the District’s Board of Trustees Facilities Master Planning and Oversight Committee (FMPOC); reviewed District policies and procedures relevant to the Bond Construction Program (BCP); and continuously met and conferred with District and BuildLACCD officials.

This quarter, the BPM instituted a new effort involving sending the BPM team out to meet with the Campus Project Team’s (CPT’s) on a quarterly basis to discuss operational matters, gain an understanding of any new or evolving concerns, make the Office of BPM more accessible to campus-level teams, and supplement information gathering for open investigations.

This quarter, the BPM continued its regular cadence of holding scheduled calls with BDO (the Internal Audit function to BuildLACCD’s PMO) and KPMG (the District’s Bond Performance Auditor). These regular touch-points allow the Office of the BPM to coordinate, avoid duplication of effort, and create synergies of oversight of the greater Bond Construction program.

I. Summary of Activities of the Bond Program Monitor [January 1 – March 31, 2025]

- The Office of the BPM currently has fourteen open investigations, one of which has moved to interim findings report status. (*See Sections V - VIII below*).
- The Office of the BPM began scheduling a series of meetings with District Colleges. Between February and the first week of April, members of the BPM investigative team visited eight of the nine college campus to meet with CPT teams, observe activities and walk active project



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sites. One campus visit, Valley, was postponed to the second quarter due to scheduling conflicts.

- The BPM team has been conducting interviews and issuing Requests for Information (RFI's) related to Bond Program complaints and investigations.
- Members of the Office of the BPM have been attending relevant District meetings and conferring with stakeholders.
- Many of the BPM team members were directly impacted by the Los Angeles fires during the week of January 6, 2025. This resulted in most of the team being temporarily unable to work at full capacity that week. The BPM was saddened to learn about how the fires also deeply impacted many District and Build personnel.
- The BPM helped to identify potential candidates to fill slots open on the District Citizen Oversight Committee, directing qualified individuals to the Chair of the DCOC. (*See discussion in Section XV below*).
- The BPM developed curriculum to train the BoT on the rules of California's Levine Act and their obligations under the Act; and consulted with the Office of General Counsel and other District officials regarding the delivery of the training.
- The BPM continued to meet and communicate with District leaders, including the Chancellor, various Vice-Chancellors, the CFO, General Counsel, personnel from District Procurement, and IT, as well as with KPMG (the Bond Program Performance Auditor), BDO (the Internal Audit function to Jacobs, the PMO for BuildLACCD), and BuildLACCD personnel on a regular basis.

II. Website, Hotline and Communication Efforts

The Office of the BPM has continued to take proactive steps to message the BPM hotline, website, and its core mission. As part of the messaging and advertising to make the widest range of District stakeholders aware of the BPM and channels by which to lodge complaints or concerns relating to the Bond Construction program, the BPM has placed posters for display in all relevant locations such as campus-level PM trailers and the BuildLACCD office in Monterey Park. Additionally, the BPM has hung banners on all college campus active construction sites. The posters and banners advertise the Whistleblower Hotline and communicate the many ways in which the Monitor may be contacted. The



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banners, designed for the active Bond construction projects on the nine campuses, are made of Tyvek and are hung on the outside of fences surrounding the construction sites. The banners are large enough to be seen by construction crews entering and exiting the construction sites, students and faculty walking or driving by, and are sufficiently durable to last through sun, wind, and rain.

The BPM's dedicated website, LACCDBondProgrammonitor.org went live with full functionality on June 19, 2024. The site continues to provide District employees, contractors, external stakeholders and the general public with information and links on how to contact the BPM with any complaints or concerns involving the District's Bond Construction Program via a dedicated online form, stand-alone toll-free telephone hotline, Email address, Mobile app, QR code, and physical mailing address.

The BPM has begun examining the use of social media channels to further its reach to community stakeholders and message the importance of integrity within the Bond Program. If determined such channels would enhance communications about the hotline and the purpose of the BPM, the launch of social media accounts will occur in the second quarter of 2025.

III. Questions from the Community

The contract with the District as Interim BPM was for a one-year period. AMI has now been awarded the role of BPM on a one-year contract, renewable for a total of five years. Over the course of this first quarter, the Monitor fielded several questions from stakeholders about what a monitor is, the role of the BPM, and how it differs from that of an external or internal auditor. Some District stakeholders think the monitor is equivalent or effectively the same as an Inspector General (IG) function. The BPM is neither an auditor nor a formal IG function. Although all three roles – auditor, IG, and Monitor – share certain core characteristics, such as organizational independence and holding institutions accountable, there are important and significant differences between the purposes each serve. They may coordinate with one another, but they do not perform the same activities. Both auditing and monitoring aim to help the District develop, implement and improve the Bond Program, but each function is distinct in its structure and aims. An auditor or audit function is a formal,



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systematic and disciplined approach designed to evaluate and improve the effectiveness of processes and related controls. Auditing in the U.S. is governed by professional standards and audits are completed by individuals independent of the process being audited. Audits involve establishing, typically a year in advance, a formal, systematic and structured approach to specific domains that will be audited. That is, based on a risk evaluation, the auditors will scope an audit plan that will be followed in the subsequent year.

An audit will only look at the domains selected. An audit team will examine documents and activities to determine whether the evaluated domain activities were conducted and the data about those activities accurately recorded, analyzed and reported according to SOPs, organizational protocols and applicable requirements. For instance, if the auditor determines Americans with Disabilities Act (ADA) compliance processes related to new buildings being constructed is to be one of the domains audited that year, the audit team will review the policies, procedures, processes (PP&Ps) related to ADA requirements and subsequently sample, test and validate that said PP&Ps within the construction program were adhered to. If the audit team identifies gaps in the PP&Ps themselves, or finds there are steps being missed, it may write up a finding for corrective action, e.g., 'this problem was identified, fix it,' and it will likely assign the finding a risk score (high, medium, low), so as to help the organization prioritize items to correct. Some corrections may be nothing more than update to an existing policy, whilst others may require remedial training, or drafting of a new process. Auditors do not investigate; rather, they validate that which is claimed to have occurred has indeed occurred. Audits are planned in advance and those departments, employees, or units responsible for the selected domains are given notice ahead of time that they will be audited. Ultimately, auditing is a much more focused business assurance function.

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations, just like an external auditor. An IA function helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The District has two internal audit groups: one within the District's Finance Department focused on non-Bond Program matters; and a quasi-independent IA function that works within BuildLACCD's PMO, responsible for



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internal audit activities within the PMO. This latter group reports to the District Facilities Executive. Typically, internal auditors are employees of the entity who report to a general or chief auditor or CFO, who, in turn, reports to the Audit Committee of the Board of Directors. The IA function within the PMO conducts compliance audits which are an objective assessment of a project's compliance against selected criteria. Projects are audited against the conditions or requirements that were set when the project was approved. Typically, these types of audits take the form of a desktop document review followed by a site inspection and/or interviews of custodians of records, if necessary. In some cases, the document review provides the department with enough information to verify that a project is compliant with conditions or requirements. Even Federal U.S. Sentencing Guidelines¹ recognize the distinction between ‘monitoring and auditing,’ but appreciate that they both are among the principal components of a recommended compliance and ethics program for any organization.

An Inspector General (“IG” or “OIG”) function is an independent statutory office holder charged with leading an independent office or organization examining the actions of a government agency.² The Association of Inspectors General sets forth in its Principles and Standards for Offices of Inspector General (“the Green Book”) that an OIG “should be formally created as a legal entity,”³ recommending that the OIG be “established by statute or, if necessary, by executive order”. The Green Book establishes a number of other criteria that constitute the basis for an OIG. These include unobstructed access to the overseen entities’ privileged information; having direct access to all records and information of the agency; holding the power to issue subpoenas for information and documents outside the agency (with same limited exceptions); the ability to administer oaths for taking testimony and being completely independent in its reporting, among other attributes. The BPM does not enjoy this statutory basis, independence, unrestricted access to District records and information, or subpoena power. The BPM is not tasked like a formal OIG in the conduct of audits, inspections or program reviews of agency (District) ethics programs. Unlike a true OIG, the BPM must request information from the District and its vendors and cannot compel testimony or production of records. Further, the

¹ U.S. Sentencing Commission, *Sentencing Guidelines*, <https://www.ussc.gov/guidelines>

² See 5 U.S.C. Ch. 4: Inspector General Act of 1978, Pub. L. 95-452.

³ Association of Inspectors General (May 2014). *Principles and Standards for Offices of Inspectors General*, aka the ‘Green Book.’ p.3. <https://inspectorsgeneral.org/files/2014/11/AIG-Principles-and-Standards-May-2014-revision-2.pdf>



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BPM submits its reports to the District Chancellor for approval and thus is not deemed under AIG standards to be fully independent or constitute a formal OIG. Nonetheless, the BPM does fulfill several of the functions typically associated with an OIG. The BPM shares with an OIG function the tasks of conducting independent investigations, and preventing fraud, waste and abuse in the program it oversees.

As a Monitor, the BPM serves as a real-time, continuous control. Although audit exercises typically rely on established sampling methodologies and transaction testing to drive their assessment, monitoring is enabled by continuous analysis of information that is coming in from a broad range of sources, including whistle-blowers and stakeholders from both within and external to the District that have concerns or complaints. The monitoring process is not confined to any one domain or pre-established domains that an audit team would work by. Monitoring allows for early identification and correction before a problem festers and could cause the Program to be in non-compliance with laws and regulations and/or suffer a loss of integrity.

Monitoring is a process and a method by which to detect legal, regulatory, internal rules, and ethical compliance risk issues associated with an organization or program's entire operation. Monitors must keep current with changes in rules, regulations, and applicable laws as well as policy shifts that the organization it monitors may make. Monitoring for the Bond Program also involves regular contact with personnel from the greater Program to ensure activities and projects are in line with District and California Department of Education rules and requirements. The aim of monitoring compliance is to gather information on levels of compliance; to communicate the findings; and, if necessary, to recommend appropriate corrective or enforcement action.

Monitoring also demonstrates to the community that there are systems in place for measuring and improving compliance, and increases community confidence in the Program, as well as in the greater oversight and regulatory systems. Monitors can be an agent of a court, or even a regulator. In many ways, the BPM is partially undertaken for the benefit of the public. In the case of the BPM, the Monitor serves the taxpayers whose property taxes and monies fund the District's Bond Program, and the other stakeholders of the District Bond Program, all of whom deserve a program that is conducted



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with the utmost integrity and that spends public monies in the most efficient manner possible, free of fraud, waste and abuse.

The BPM is empowered to investigate all relevant complaints that relate to any element of the Bond Program. The BPM can identify trends that may point to an area where digging deeper than an audit is warranted and requires immediacy of action and remediation. The Office of the BPM is an operational function designed to address acute instances of fraud, waste and abuse. Having a monitor over the entire greater Bond Program helps the District, the BoT, and the vendors and contractors to the Program to affect changes when an activity does not meet, or is at risk of not meeting, its intended results. Unaddressed failures or other deficiencies not only weaken processes within the Program, they can also create unexpected liability if regulators or others determine that the District did not take reasonable measures to achieve compliance. This means that the outcome of monitoring must be more than identifying actual or potential non-compliance; it leads to the District leadership taking actions that correct the non-compliance risks, strengthening the Bond Program and helping to ensure it is fulfilling its mission of enhancing the educational environment that serves students.

That a BPM exists does not mean all others can cease vigilance in the Bond program. Every District stakeholder has a role to play in the efficacy of the Office of the Bond Program Monitor. Having a Monitor does not negate the importance of people at all levels speaking up when allegations of wrongdoing come to them. It is useful to recall that in case after case much of the power over people's lives – professional and personal – is not wielded by the courts, judges, and/or juries, but by leaders in organizations through whose desks allegations may pass, who are granted a sort of power of quasi-judgment. Those who fail to do what is right by reporting observations of possible misconduct weakens us all, as ignoring allegations of wrong-doing or questionable practices is harmful to justice. Waiting for a whistleblower to get the courage up to contact the BPM cannot be the default setting. Leaders at all levels within the Program cannot expect to lodge a formal complaint thus securing plausible deniability, but then studiously avoid looking any deeper, hoping that the Monitor will or will not uncover more. Self-interest at the expense of public interest has no place in this Program. However, together, from District leadership to auditors and from the Monitor to the DCOC, we work



to help keep the Bond Program functioning at the highest level of ethics and integrity, delivering value to students, faculty, staff and the taxpayer community of greater Los Angeles.

IV. Meeting and Conferring with Key Stakeholders

The BPM and her team have established regular attendance at key District meetings and regularly travel out to campuses to meet with CPT's and stakeholders. Additionally, the BPM has continued to endeavor to become known widely in the District, offering an 'open-door' to any stakeholders wishing to discuss the Bond Program. This effort has helped to make the BPM known and accessible, whilst encouraging stakeholders to share any concerns they may have about the program.

The BPM holds monthly meetings with the District Chancellor and provides regular monthly summaries of monitoring activities, as well as maintaining regular communication with the Chancellor on investigative developments. The BPM also holds regularly scheduled meetings with the District's Vice Chancellor & Chief Facilities Executive. Additionally, the BPM regularly communicates with the District CFO, District General Counsel and others from the Office of General Counsel ("OGC"), personnel from across BuildLACCD, as well as campus-level PMs and their staff. The BPM would like to thank the many campus Project Directors who warmly welcomed the BPM team to their job sites, shared their current projects and plans, and candidly discussed their programs.

The BPM holds regular monthly meetings with the BuildLACCD PMO Internal Audit function performed by BDO. These meetings allow the BPM and BDO to share developments and discuss ways in which to plan areas of focus and collaborate. So too, the BPM holds Quarterly meetings with the Bond Performance Auditor, KPMG, providing the opportunity to share and exchange information and activities relative to each office's remit.

See *Section XIX* below for further outreach and communication efforts undertaken by the BPM this Quarter.



V. Number of Complaints Received This Period

The BPM received a total of four new complaints in this first quarter of 2025. None of the four complaints warranted opening an investigation. No complaints were received in January 2025. Two complaints received in February 2025 related to already open investigations. The new information received from the complainants was incorporated into the existing case files. Of the two complaints received in March 2025, the first related to an active vendor with the Bond Program and is still being evaluated. The allegation claims a potential conflict of interest and a determination about the complaint is anticipated in April 2025. The second complaint was related to a prior vendor to the Bond Program. The vendor has not been active with the District Build program for nearly a decade and thus did not warrant further investigation.

The BPM takes all complaints received very seriously and gives them full attention prior to determining whether an investigation is warranted. All complaints are archived. Should a new complaint come providing additional information related to a prior complaint, this could potentially prompt the opening of an investigation where in the first instance facts provided in the initial complaint may have been determined to lack either merit or sufficient detail to warrant the opening of a formal investigation. Similarly, just because a complaint brought to the Office of the BPM involves allegations relating to matters outside of the Bond Program, the BPM does not ignore these. Rather, every effort is made to refer these types of complaints to the appropriate District officials, departments or even external organizations that would have oversight responsibility relevant to the complainants' allegations or concerns.

VI. Number of Investigations Opened This Period

No new investigations were opened in the first quarter of 2025.



VII. Number of Investigations Closed/Resolved This Period

Two investigations were resolved this quarter:

1. The first matter related to an allegation that individuals associated with one of the District's colleges' contracted Campus Program Teams ("CPT") were billing the Bond Program for hours they had not worked and that frequently CPT members were absent from the College. An initial review of the evidence provided suggested there was possible merit to the complaint. The Office of the BPM collected data, conducted interviews and observed activities at the college in question. Upon collecting and reviewing facts relevant to the investigation, it was determined by the Monitor that the allegation was unfounded and that any absences by CPT members were documented and warranted. The BPM determined that there were no violations relating to the Bond Program that required further action. The BPM's investigation was then closed with no further action on the part of the Monitor deemed necessary. Should any new information come to light, the Monitor reserves the right to re-open the matter.
2. The second matter related to allegations of certain employees of the Bond Program's Project Management Office ("PMO") team acting outside of their authority; representing themselves in a professional capacity for which they were not authorized; and unilaterally negotiating directly with third parties without consultation with District legal counsel or through other District oversight. The BPM collected information from the complainant over a period of time and reviewed the documents and copies of correspondence provided. From the written information provided, and in private consultation with the District Office of General Counsel ("OGC"), the BPM identified and confirmed that the complaint related to a matter already open with the OGC and thus referred the complaint and the documentation to the OGC. The BPM's investigation was then closed with no further action on the part of the Monitor deemed necessary.



The BPM is tasked with investigating to the fullest extent possible any potential ethical or legal violations involving the District's Bond Program and then making recommendations for remedial action to the District. In the highly unlikely event the District failed to act on a recommended remediation, the BPM has the authority to take the matter to external Bond counsel and/or external regulators. The BPM does not observe a problem and then fail to act, as this would be completely contrary to the integrity of the program and undermine the effectiveness of the Monitor. The Monitor takes the remit conferred upon it by the District Board of Trustees (BOT) extremely seriously and does not close an investigation unless and until it is resolved satisfactorily, or is confirmed to be completely without merit.

VIII. Number of Investigations Currently On-Going

Fourteen investigations are currently in-process. The Office of the BPM is actively fact-gathering for all investigations. Thirteen investigations were in-process during the first quarter of 2025, and one investigation moved to draft report status, with the Chancellor and OGC having been briefed on the preliminary findings.

The Office of the BPM is actively fact-gathering for the thirteen investigations and anticipates releasing its findings reports on at least three or more by second quarter of 2025. The current investigations can be grouped as follows:

1. Allegations of Build and/or District employees engaging in conflicts of interest or financial self-dealing. Some of these activities rise to possible criminal violations, whilst others violate District Code of Conduct and COI rules.
2. Allegations of violations of the Levine Act and/or other elements of the California Political Reform Act.



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3. Allegations of wage and hour or other labor-related non-compliance, ranging from failures to pay prevailing minimum wage to withholding earned wages.
4. Allegations of abuse of Bond funds for purposes non-compliant with Prop 39 and/or misuse of Program resources.
5. Build employees working outside of their remits or serving in positions for which they are not qualified.

The BPM takes this opportunity to remind readers that the Office of the BPM takes due process seriously. No matter how cogent allegations of wrong-doing may appear at the time they are made to the Monitor, even if others are adding to the allegations, this does not, in itself, constitute proof of guilt. The BPM takes as much time as is needed to conduct all relevant fact-gathering to ensure a fair process to all.

IX. Number of Matters Referred to Prosecutorial Authorities

No matters from the BPM's office have been referred to prosecutorial authorities this Quarter. However, the BPM anticipates that it may recommend that the District refer to the California Fair Political Practices Commission (FPPC) any potential violations of the California Political Reform Act upon issuance of one or more of its investigative findings.

X. Number of Prosecutions, Convictions, Recoveries from Referred Matters

No prosecutions, convictions, or recoveries from past or referred matters from the BPM's office occurred during this period.



XI. Number of Matters Referred for Civil or Administrative Remedy

No matters from the BPM's office were referred for civil or administrative remedy during this period.

XII. Trends or Patterns Identified

(a) The BPM has observed that cooperation from many Build and District employees has not been as consistent or robust as needed. The BPM has numerous investigations currently open and progress on several has been severely hampered by the failure of individuals contacted by the BPM to respond either in a timely manner, or at all. The BPM raised this issue to the OGC and Chancellor and hopes the District will prompt its personnel and vendors under Build to comply with their obligations to cooperate with the BPM in the future. The BPM takes this opportunity to remind contractors and vendors of their legal contractual obligations to fully cooperate with any District-driven investigation, and to remind District employees of their obligations under District employment rules to fully cooperate and assist in all District-related investigations.

(b) The BPM has observed that the Bond Program has grown in such a way that the levels of sub-contracting sometimes go two, three, even four levels deep. Additionally, it has been noted that there is an unhealthy level of patronage occurring. Whilst it is understood that the greater public construction community in Los Angeles is not as large as might be expected and thus many people know one another from having worked across vendor companies and projects over the years, meritocracy in the Bond Program should be stronger. When jobs are given to friends and family members, suboptimal candidates may win work at the expense of performance. Nepotism in the broadest sense potentially allows mediocre people to circumvent systems intended to produce optimal efficiency and top results.

Subcontracting may also be contributing to fall offs in performance. Subcontracting can disperse and dilute responsibility to the point where it vanishes completely. Although on paper accountability may



reside with the prime or second-level contracting company, who is actually responsible for ensuring the sub- or sub- sub- contractor is qualified and performing the work to the highest standard? Subcontracting can be a recipe for “buck-passing”. It can leave the contracting organization, in this case the District, ignorant of the materials, techniques, and technologies employed by third parties and it can disenfranchise District employees from feeling responsible for the end results. Tasks are removed from the final outcomes and components of each piece of work become detached or estranged from the greater whole or central purpose, making the jobs/tasks only about earning money, not about safety, human lives, usefulness, or quality buildings. Procurement processes and greater restrictions on sub-contracting may warrant revisiting and revising to reduce this trend.

(c) Whilst it is laudable that the District seeks to award contracts largely on price, driving bidders to compete to cut costs, studies⁴ have identified that this approach to bidding can result in much higher instances of concealment, false claims, manipulation of tests, and other forms of deceptive practices, The argument has been that maintaining specialized expertise in-house is too expensive. Nevertheless, when projects last for years and the Bond Construction Program has already run over nearly two decades with many more years to go, is this argument completely valid? If asked, most people would not express willingness to take the elevator built by the engineer who pared the work on the design and construction to the bone. The BPM will be writing up recommendations to the District regarding more stringent due diligence on sub-contracting and select non-compete awarding of roles and contracts within the Program.

⁴ See Margaret Heffernan, *WILFUL BLINDNESS: WHY WE IGNORE THE OBVIOUS AT OUR PERIL* (New York: Simon & Schuster Ltd, 2019); Rt Hon. Sir Martin Moore-Bick, Ali Akbor OBE and Thouria Istephan (Sept 2024) *Grenfell Tower Inquiry: Phase 2 Report Overview. Report of the Public Inquiry into the fire at Grenfell Tower on 14 June 2017*; Craig D. Lair (2019) “Outsourcing and the Risks of Dependent Autonomy.” *SAGE Open*, 9(2)
<https://doi.org.10.1177/2158244019845177>



XIII. Pro-Active Assessment Activities Conducted This Month

Consistent with the District’s contract with AMI as BPM (6.0 ‘Excluded Services’), no proactive monitoring by search and detect methodologies in the absence of reported suspicion of fraud, waste, abuse of other “Misconduct” as defined in the District’s Solicitation of Quotations Bond Program Monitoring Service § 1.2 was conducted this month. Any testing by the Office of the BPM of BuildLACCD processes, procedures or outcomes was related to specific investigations and/or information suggesting fraud, waste or abuse.

XIV. Policies Reviewed

- The BPM reviewed CA Govt. Code § 87103 on Financial Interests (relating to public officials).
- The BPM reviewed CA Govt. Code § 1091.5 on public employees and private contracts.
- The BPM re-reviewed District Board Administrative Procedure AP 2710, Conflict of Interest.
- The BPM re-reviewed District Board policies on the prohibition on Receipt of Gifts in Excess of the Gift Limit.
- The BPM reviewed District Board Policy BP 2715, Code of Ethics – Standards of Practice.
- The BPM reviewed the California Fair Political Practices Commission (FPPC) guidance on the Political Reform Act, § 87406.3 on restrictions related to post-governmental activity of public officials.
- The BPM reviewed the California Fair Political Practices Commission guidance on the Political Reform Act, § 87407 on restrictions related to taking part in decisions relating to a prospective employer.
- The BPM re-reviewed the Regulations of the FPPC, Title 2, Div. 6 § 18702.1, Materiality Standard: Financial Interest in a Business Entity.
- The BPM re-reviewed California State public service ethics laws, rules and penalties.
- The BPM reviewed FPPC forms and guidance on CA Forms 804 and 805 relating to the disclosure by state and local government agencies identifying consultants that make or participate in making governmental decisions on behalf of the agency.



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- The BPM re-reviewed FPPC guidance on public agency filing duties related to statements of economic interests.
- The BPM re-reviewed Federal honest services fraud laws and related federal case-law on racketeering, the Hobbs Act, and wire fraud relevant to prosecutions of local public officials.
- The BPM reviewed notices relating to data breaches involving District systems in the past five years.
- The BPM reviewed the Ninth Circuit decision in *Gilberg v. Cal. Check Cashing Stores, LLC*, No. 17-16263, 2019 WL 347027 (Ninth Cir. Jan 29, 2019)
- The BPM re-reviewed the Federal Trade Commission’s guidance on the FCRA and compliance with the Act.
- The BPM re-reviewed the California Confidentiality of Medical Information Act (CMIA) and requirements therein.
- The BPM re-reviewed the California Investigative Consumer Reporting Agency Act (ICRAA), CA Civ. Code 1786 et seq. (as amended September 26, 2001) and obligations of agencies therein.
- The BPM reviewed District RFP 23-01; RFP-24-04; and RFP 20-05.
- The BPM reviewed the BuildLACCD Labor Compliance & Project Labor Agreement (PLA) processes and the District’s Amended Project Labor Agreement, amended 15 March, 2024.
- The BPM began reviewing District Board of Trustees Regular Board Meeting minutes January 1, 2023 to current (March 31, 2025).
- The BPM reviewed the PMO’s Active Construction Projects Status Report – February 2025.
- The BPM re-reviewed FMPOC meeting minutes from March 2025.
- The BPM reviewed the Coalition for Integrity Oversight of Infrastructure Spending (2021) report.
- The BPM reviewed the Bond Performance Auditor, KPMG’s, draft audit of the District Bond Programs, Fiscal Year Ended June 20, 2024.
- The BPM reviewed Fair Political Practices Commission (FPPC) January 2025 Legislative Update; FPPC Staff Memo 7.0 on recent FPPC decisions; recent case law relevant to school



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district elected board members and officials; and other FPPC publications including those for Officers under § 84308 and Parties & Participants under § 84308.

- The BPM reviewed the LACCD Housing Strategy dated February 5, 2025.
- The BPM reviewed the California Secretary of State Lobbying Directory 2023-2024.
- The BPM reviewed the District's RFP No. 25-05 for Program Management Services.
- The BPM reviewed California and Los Angeles-specific labor laws and wage ordinances.
- The BPM reviewed the DCOC Report for FY 2023-24.
- The BPM reviewed the PMO's January 2025 Active Construction Projects Status Report.
- The BPM reviewed the PMO's Active Projects Status Update, dated February 21, 2025.
- The BPM reviewed the DCOC's Semi-Annual Report (February 2025).
- The BPM reviewed the PMO's January 2025 Active Design Projects Status Report.
- The BPM re-reviewed FMPOC meeting minutes from February 2025.
- The BPM reviewed certain Form 700 filings.
- The BPM reviewed legislative updates to the CA Levine Act (CA Govt Code § 84308) resulting from the passage of Senate Bill 1181 and Senate Bill 1243 that went into effect January 1, 2025.
- The BPM re-reviewed the CA State Contracting Manual.
- The BPM reviewed the District's Uniform Construction Cost Accounting: Informal Bidding Pre-Qualification Application for the 2024 calendar year.
- The BPM re-reviewed the California Association of Bond Oversight Committees Best Practices guidance.
- The BPM re-reviewed the BuildLACCD Staff Augmentation MATOC Pre-SOQ Meeting slide deck provided to bidders by PMO Jacobs
- The BPM reviewed BuildLACCD December 2024 Large, Small and Bench Openings Forecasted Upcoming Projects Bidding Reports



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- The BPM reviewed California law and practice guides on Design-Build for CA public buildings.
- The BPM reviewed the California Community Colleges Chancellor's Office 2024 Chaptered Legislation and Guidance Report
- The BPM reviewed Assembly Bill 1142, Ch. 349, amending the Education Code (and going into effect January 1, 2025) relating to community colleges granting use of college facilities and grounds under (their) control and 'direct costs.'
- The BPM read a report issued by Harvard University, Center for Education Policy Research and the University of Southern California, *Regaining Ground: Enrollment Trends in the Los Angeles Community College District in the Wake of Covid-19* (July 2024) to understand decreasing enrollment against current Build projects.
- The BPM reviewed LACCD Board Rule 7100 *et seq.* (Board Rules, Ch. VII, Art. 1)
- The BPM read the KPMG *draft (LACCD) FY23-24 Bond Performance Audit* (Draft V4, dated 16 January 2025) and reviewed the FY23-24 Executive Summary provided to the FMPOC on January 22, 2025.
- The BPM reviewed the BuildLACCD Active Construction Project Status Report, dated December 2024; and the BuildLACCD Active Design Project Status Report, dated 31 December 2024.
- The BPM re-reviewed FMPOC meeting minutes from June – November 2024.
- The BPM reviewed the composition of LACCD college campus foundation boards.
- The BPM reviewed CA Dept of State Architecture Procedural rules

XV. Significant Problems or Impairments and Recommendations for Remediation

(a) As previously reported in the BPM's Second Quarterly Report, the BPM has identified that District employees may be leaking confidential information to external parties. The BPM has continued to receive inquiries from individuals from outside of the District who have sought to discuss investigations or matters that the BPM has reported *solely* to the Chancellor and the Office of General



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Counsel. There is a troubling pattern of privileged and confidential information seemingly being leaked to those who should not have the right or access to such information. It is not known how widely information shared by the BPM with the Chancellor's Office and that of the OGC travels in terms of information passed along to other District officials, Board of Trustees, or support staff. Nonetheless, these repeated leaks of highly sensitive information are deeply troubling. Not only do these leaks about subjects of individual investigations risk hampering obtaining evidence relevant to the investigations, but they could result in reputational harm to the entities/individuals whose names are leaked and about the nature of the allegations involving them. Ultimately, should someone perceive they have been harmed by the leaking of information related to them or their company, the District may face potential litigation.

(b) The BPM observed that the District Citizen Oversight Committee (DCOC) struggled to convene a quorum between October 2024 and March 2025 (a six-month period). Because the DCOC has been unable to source individuals meeting current criteria to fill required roles on the Committee, this oversight function has suffered and been unable to work at its full potential. The BPM notes that the application process for potential Committee members is not well advertised, nor is it particularly easy for citizens willing to volunteer their time to apply to join the Committee. Some candidates reported to the BPM that after submitting their applications, they never heard from the District again. The DCOC is a required function of a California school District Bond-funded program⁵. In order to make the DCOC more effective and to facilitate better recruitment, the BPM believes there could be some adjustments made by the District in how the Committee is advertised, the roles to be filled, and the process for applicants improved. The BPM has attempted to help identify potential candidates to fill slots open on the Committee, but this is not a job for the BPM, or a sustainable recruitment method, merely a stopgap to assist the chair of the DCOC. A revamp of the overall recruiting program is recommended.

⁵ CA Education Code 15278 - 15282



Specifically, the BPM has observed the current composition of the respective campus College Citizen’s Committees (“CCC”) and their activities. The DCOC seeks to have each college identify an internal person, usually a student, to represent the respective college on the Committee, drawn from their respective CCC’s. However, students being transient with schedules that may change semester to semester do not make the most reliable or best representatives to the DCOC. Further, students may not possess the requisite background and skills to effectively evaluate the Bond Program, and after familiarizing themselves with the Program, subsequently graduate and roll off both their campus CCC and subsequently the DCOC. The BPM recommends the District consider amending the description of the college representative roles and expand how it advertises and recruits its representatives to the DCOC. For instance, parents already serving on PTAs of high schools adjacent to District colleges might make informed representatives to the CCCs/DCOC, so advertising to parents and teachers of high schools which feed students to District colleges may field individuals interested in serving on the Committee and bring awareness of local concerns and support from an important constituent group. Advertising might also seek to reach out to regional professional associations, affinity bar associations, and neighborhood/business groups, e.g., San Fernando Valley area groups such as the San Fernando Chamber of Commerce, Valley Industry & Commerce Association, San Fernando Valley Bar Association, and the LA County Bar Association, etc. If recruiting efforts target by college regional grouping, such as colleges in the valley (Mission, Valley & Pierce); City core (LACC, Trade-Tech & ELAC); and Southwest (Harbor, Southwest and WLA), this may help to bring in people who represent local communities and who have a stake in serving the DCOC diligently. The BPM hopes that a new process will better ensure a regular quorum for the DCOC and allow it to function as the law intended.

(c) In reviewing policies, procedures and processes related to BuildLACCD contracted PMO personnel, the BPM identified that new hires are given an ‘onboarding’ packet of documents. The packet contains information on a wide range of topics, from instructions on how to use their desk phones at Build, to personnel directories, and templates for time-sheets. Included in the packet is a document titled, “016_BuildLACCD Code of Conduct,” (hereinafter “the CoC”). The BPM reviewed the CoC in an effort to identify any specific language prohibiting secondary employment and/or requirements to disclose third-party employers to the District. The review of the CoC does identify outside employment as a *potential* conflict of interest and prohibits certain actions and functions if



contracting decisions or supervision involves family members or close friends. However, the CoC does not create a rule prohibiting outside secondary employment with a requirement for any sought exceptions to be made via a formal exception process. Additionally, the BPM identified that the CoC has not been updated since 2017, pre-dating Jacobs' assumption of the PMO contract. The CoC is signed by the former Chief Facilities Officer, Tom Hall, who retired in December 2019. It also identifies the BuildLACCD point-of-contact for the PMO Risk Management Team as being Philip Hamblin, Senior Program Risk Manager. Mr. Hamblin has not been employed at Build since 2017. The CoC also contains multiple typos, lists the District's Whistleblower hotline as being the hotline for BuildLACCD, which it is not, and makes no mention of the role of the Bond Program Monitor or the BPM hotline. The CoC must be updated immediately, and renewed training on the updated and revised manual provided to all Build employees as soon as possible. That the current PMO has neglected for seven years to provide an accurate and updated Code of Conduct to Build personnel is troubling and suggests a certain laxness in its attitude to critical compliance duties.

(d) The Office of the BPM has continued to experience difficulties accessing the full document repository of the PMO. The BPM had again asked the PMO to review its level of access to DocView due to on-going difficulties in timely access to information relevant to investigations. Specifically, the PMO's own DocView super-user had observed to members of the BPM team that clear full functionality of DocView had not been granted. This was corrected in this first quarter (2025), but access remains throttled. The lack of access and functionality to this data repository is having a negative impact on the BPM team's efforts to find and review information needed for its investigations. This may be a function of the BPM not having a physical office at a District property, as the BPM has been informed that many of the District's systems require connectivity only available from a District-held property. This access restriction also relates to the Office of the BPM continuing to encounter certain critical obstacles to performing its work effectively. Namely, it does not enjoy access to many of the systems that house documentation relevant to its investigations. For example, vendor contracts are not readily available and supporting documentation for claimed time and expenses that accompany vendor invoices are not accessible. Having to ask Build personnel for particular pieces of information leads to employees within Build (PMO, CPTLs, etc.) providing each other with 'advance warning' that the BPM is looking into certain activities. The Office of the BPM is organized



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to report to the Chancellor. This should mean the BPM has at its disposal the access needed to locate relevant information within District systems as they relate to the Bond Construction Program easily and without delay. This limitation on the BPM's ability to conduct its work has been raised to relevant District officials repeatedly for months now, with no remediation to date.

(e) As discussed above, the Office of the BPM has identified gaps in systems and access to information relevant to the BuildLACCD program. Multiple repositories of contracts, invoices, billings, and other relevant documentation contain disparate pieces of information creating barriers to comprehensive insights into vendors, activities, contractors, and support for projects and personnel in the Bond Construction program. It is understood that there are future plans to consolidate a couple of these systems sometime in late 2025. Nonetheless, the lack of full access to relevant information slows down not only BPM investigations, but also negatively impacts access to data needed by the District's own procurement, finance, and legal teams. The District has not made relevant technologies and systems available to the BPM. To conduct its investigations, and to monitor the integrity of the Bond Program, the Office of the BPM needs full access to all relevant systems and technologies utilized by the District. Hindered access to information may result in costly delays and even leave critical areas of the District's Bond Construction Program unexamined, to the detriment of the District and the taxpayers who fund the Bond Program. This hindrance weakens the Office of the BPM, irrespective of the firm filling the BPM role, and should be carefully reviewed by the District. The goal of any integrity program designed to protect the public or the use of public monies is to constantly strengthen and enhance confidence in the oversight function. In some ways, Board Policy 6740 sought to create an Inspector General-like function, but one without enforcement powers, genuine independence, or access to District resources. There are substantive changes that could be adopted by the District that would make the Office of the BPM stronger and better help the District achieve its goal of integrity throughout the Bond Program.

(f) As discussed in our prior quarterly reports, the current Board Policy over the formation of the Office of BPM forbids the District from providing office space to the BPM. The BPM reiterates that its existence fills a central role in oversight of the District's Bond Construction program and it is important the BPM team be seen in and around District facilities and be viewed as both accessible to



District employees and contractors, as well as integrated into the greater District community. Independence will not suffer if the BPM leases, or is provided with, office space at a facility the District owns. In May 2024, the BPM recommended this prohibition be re-visited. The status remains open and the District has yet to respond.

(g) Effective monitoring needs credible penalties. The BPM has identified that a more robust system of discipline, sanctions and debarment may be needed for the Bond Program. In the absence of such penalties, private suppliers are incentivized to continue behaviors that can compromise the integrity of the program. The BPM has witnessed other school districts and government organizations that have failed to construct meaningful sanctions and debarment programs, or exercise contractual rights to terminate for cause out of fear of litigation or loss of vendors to their detriment. But this approach of hesitancy or neglect to discipline or remove vendors who fail taxpayers via the institutions that contract with them when they do not perform as they should or violate the law only leads to another form of hidden cost: that of shifting the risk to taxpayers and furthering a culture of low- or non-accountability. Such negative consequences have a tendency to spread, so that it is not just one agency or district that suffers, but instead sees a county, region or sector begin to suffer from lack of choice, low quality providers, and ill-qualified people charging exorbitant fees to provide inferior results. The most demanding programs of public agencies maintain robust sanctions and debarment procedures. Such formalized procedures can actually build a culture of trust, confidence, and of competitiveness. The private sector wants to do business with agencies they know to be clean. Being free of fraud, waste and abuse means free of hidden costs, lower risks, and higher likelihood of working with other companies that are trust-worthy and ethical.

XVI. Identification of Identified High-Risk Areas within the District Bond Program

(a) The BPM has identified via several of its current open investigations a gap in oversight relating to compliance with wage and hour and other labor laws within the Bond Program.. The PMO confirmed with the BPM this quarter that its current Labor Compliance Department does not inspect, monitor, or



audit professional services firms contracted by the District for the Bond Construction Program operating at the college campus levels for compliance with California and local Los Angeles labor, wage and hour laws. This means that compliance checks and oversight do not exist and has not occurred at least since the 2018 PMO contract award. Given that the BPM has already identified some degree of non-compliance with contracted hourly wage rates, this lack of oversight by the PMO and the knowledge gap poses a significant risk to the District as it opens the District up to potential claims of labor law violations and litigation. Professional services firms may be violating additional labor laws. The BPM is precluded from conducting audits, but has raised these concerns with KPMG, the Bond Performance Auditor. KPMG acknowledged in its Performance Audit⁶ that they too identified inconsistent adherence to SOPs for Labor Compliance, or absent methodologies for oversight of labor by the PMO.⁷ The BPM anticipates recommending that KPMG include in its 2024/2025 Performance Audits a robust review of time-card submissions, tracking and confirmation of hours personnel bill the District for actually having been worked, and that rates of pay at all levels of the Build program are complying with existing labor laws and all contractual obligations.

(b) As recounted above, the BPM recently found that the Build Personnel Manual covering conflicts of interest was seriously out of date, pre-dating Jacobs as PMO, and missing key components. There are a number of instances where the BPM has identified that personnel within the PMO may also be running their own companies but have failed to disclose this to the District. It does not appear that Jacobs has a control process in place to ensure such COI's are swiftly identified and remediated. The BPM has identified an unfortunate trend that suggests compliance controls within the PMO function could be stronger. More than half of all investigations opened by the BPM since May 2024 have involved allegations of Build employees abusing their positions, serving in unqualified capacities, allowing for potential regulatory compliance violations to occur due to lack of oversight, and engaging in various activities involving conflicts of interest. In speaking with employees at Build, the Office of the BPM has been troubled to hear that many of them do not appear to have an understanding of

⁶ KPMG (5 Feb 2025) *Performance Audit of Los Angeles Community College District Proposition A, Proposition AA, Measure J, Measure CC, and Measure LA Bond Program, Fiscal Year Ended June 30, 2024.*

⁷ *Id.* P 15



prohibitions on receiving gifts and/or their obligations, despite being ultimately employed by a private firm to work under District rules within the District’s Bond Program. These compliance control gaps need addressing as soon as possible. The BPM will be issuing a series of recommendations to the District specific to control gaps identified via its investigations.

XVII. Areas of Forthcoming Review and Audit

(a) The BPM has begun to follow BuildLACCD’s efforts to develop student housing at a reasonable price consistent with protecting tax-payer dollars from waste and abuse and will continue to scrutinize proposals relating to the student housing efforts. The Chancellor’s reports of the last few months,⁸ while positively reflecting increased enrollment within the District, have also presented evidence of an increase in the proportion of students attending remotely. Seventy-three percent of noncredit students are being taught remotely, and 44 percent of enrolled students for credit courses are learning remotely. Another 8 percent are in hybrid learning environments. With so many students now learning remotely, housing and new building projects should be carefully scrutinized for appropriateness to the needs of the District’s student population and their preferred learning models.

(b) The BPM has heard of the poor performance by certain vendors at several colleges. The BPM will be examining the facts related to these vendors and the projects and will open formal investigations, if warranted.

(c) The BPM has learned through conversations with District personnel and contractors of several activities/projects that raise questions of appropriateness and/or have been identified as potentially problematic. The BPM has begun to draft initial plans for fact-gathering specific to these identified activities. Specifically, the BPM will be:

⁸ E.g., see Los Angeles Community College District. *Chancellor’s Monthly Report* (8 Jan 2025) pp 19-20.
<https://www.laccd.edu/sites/laccd.edu/files/2025-01/Chancellor%27s%20Monthly%20Report%20January%202025.pdf>



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- Testing BuildLACCD SOP's for change orders based on discussion with District personnel that they are currently too high-level and allowing abuse of District Bond monies. The BPM has discussed this effort with BDO, the Internal Audit function of the PMO, and they will consider adding it into their forthcoming audit schedule for 2025.
- Testing the appropriateness of certain Bond Program expenses.

XVIII. Follow-Up Requests Received from the Board of Trustees

The BPM was asked by the BoT to provide training to them on recent updates to the California Levine Act that went into effect on January 1, 2025. Training was provided by the BPM at the February 5, 2025 Board meeting. Written materials were also provided to the Trustees by the BPM.

XIX. BPM Meetings Held with District Officials, Leaders & Stakeholders

During this period, the BPM has attended District meetings and met with officials and stakeholders from across the District's Bond Construction Program:

- The BPM held its regular standing monthly calls with District Chancellor, Dr. Román, in January, February and March 2025.
- Members of the BPM team visited Harbor College and met with members of the CPT team on January 21, 2025.
- The BPM held its monthly-scheduled call with BDO, the PM's Internal Audit function, on January 21, 2025.
- The BPM met with the chair of the DCOC on January 28, 2025.
- The BPM communicated with the chair of the DCOC on multiple occasions in late January to direct candidates on how to apply to serve on the DCOC.
- The BPM has held regular communications with District departments including Procurement, Facilities, and the Office of General Counsel.



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- The BPM and her team have held regular correspondence with individuals from BuildLACCD's PMO, and certain campus-level CPTs throughout the month of January.
- Members of the BPM team visited BuildLACCD offices and met with individuals there, including the PMO's compliance function.
- Members of the BPM team met with several CPTL's throughout the month of January.
- The BPM held its regular standing monthly call with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive on February 4, 2025.
- The BPM provided training on the Levine Act to the District Board of Trustees on February 5, 2025.
- The BPM attended the Board of Trustees meeting on February 5, 2025.
- The BPM held its quarterly call with the Bond Performance Auditor, KPMG on February 18, 2025.
- The BPM team held a video conference with members of the PMO's team on February 7, 2025, and had numerous communications with PMO personnel.
- The BPM has held regular communications with District departments including Procurement, Facilities, and the Office of General Counsel.
- The BPM had several calls/communications with external Bond counsel in the month of February, 2025.
- Members of the BPM team attended the FMPOC meeting on February 19, 2025.
- The BPM attended and presented at the DCOC meeting on February 21, 2025.
- The BPM held numerous discussions/communications with the Chancellor in the month of February 2025.
- The BPM fielded responses to and spoke with a member of the public who sought clarity about BPM reports.
- The BPM and her team have held regular correspondence with individuals from BuildLACCD's PMO, and campus CPTs throughout the month of February.
- The BPM liaised with counterparts at LAUSD regarding overlapping vendors and issues.
- Members of the BPM team visited BuildLACCD offices and met with individuals there



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- The BPM held its regular standing monthly call with District Chancellor, Dr. Roman, on February 26, 2025.
- Members of the BPM team met with CP team members at Mission College on February 26 & 27, 2025.
- Members of the BPM team met with CP team members at Los Angeles City College on February 27, 2025.
- The BPM team met with the CPT team at Southwest College on March 3, 2025.
- The BPM team held a virtual meeting with the interim head of the CPT team at TradeTech on March 5, 2025
- The BPM team met with the CPT team at West LA College on March 11, 2025.
- The BPM team met with the CPT team at Harbor College on March 12, 2025.
- The BPM held its regular standing monthly call with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive on March 3, 2025.
- The BPM has held regular communications with District departments including Procurement, Facilities, and the Office of General Counsel.
- The BPM team held regular communications with the CPTs at many of the colleges throughout the month of March.
- The BPM held several discussions/communications with the Chancellor in the month of March 2025.
- Members of the BPM team attended the FMPOC meeting on March 19, 2025.
- The BPM and her team have held regular correspondence with individuals from BuildLACCD's PMO, and campus CPTs throughout the month of March.
- The BPM held its regular standing monthly call with District Chancellor, Dr. Roman, on March 25, 2025.
- Members of the BPM team met with the CPT team at TradeTech on March 27, 2025.



XX. Forthcoming Meetings with District Board of Trustees, Committees, or Other Stakeholders

- BPM team members will meet with CP team leaders at Pierce College on April 1, 2025.
- The BPM will attend the District Board of Trustees meeting on April 2, 2025.
- The BPM will hold its standing monthly call with Chancellor Roman on April 15, 2025.
- Members of the BPM team will attend the FMPOC meeting on April 16, 2025.
- The BPM will hold her monthly standing call with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive on April 21, 2025.
- The BPM will attend the DCOC meeting on April 25, 2025.
- The BPM will continue its regular on-going discussions with the Office of General Counsel; District Procurement and Contract team members; the CFO; external Bond counsel; and other stakeholders.

The BPM and members of the BPM team will continue to regularly meet with a wide range of District stakeholders including the Chancellor, Interim Vice-Chancellor of Facilities, personnel from the District's OGC, Office of the CFO, Procurement, IT, BuildLACCD personnel, external Bond counsel, Board Trustees, and others.

The BPM maintains an open-door policy and welcomes all District Board Members, members of the DCOC, personnel from the PMO, CPLTs, District employees, and stakeholders from across the District and the Build program to contact her or BPM team members with questions, concerns, recommendations, or just to say 'hello.' The BPM team has enjoyed a kind reception from the College CPTs and appreciates their sharing of information about projects, and their insights. Together, we all can help keep the District Bond Construction program operating with ethics and integrity.

Mikhail Gordon

Mikhail Gordon
LACCD Bond Program Monitor