



**REPORT OF THE  
LOS ANGELES COMMUNITY COLLEGE  
DISTRICT  
BOND PROGRAM MONITOR**

**2025 Bi-Annual Report  
[Q3 & Q4 Activities]  
July 1 – December 31, 2025**





2025 Semi-Annual Report of the Activities of Bond Program Monitor  
(July 1 – December 31, 2025)



**Affiliated Monitors, Inc.**  
**Office of the Bond Program Monitor**

**June 8, 2026**

Office of the Bond Program Monitor

1200 S Brand Blvd., #401

Glendale, CA 91204

[LACCBondProgrammonitor.org](http://LACCBondProgrammonitor.org)

[Monitor@laccdbondprogrammonitor.org](mailto:Monitor@laccdbondprogrammonitor.org)



# Introduction

This report represents a high-level summary of activities undertaken by the Los Angeles Community College District’s (“LACCD” or “the District”) Office of the Bond Program Monitor (the “OBPM”) during the third and fourth Quarters of 2025 (July 1<sup>st</sup> through December 31, 2025) (the “Period”). The OBPM 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.

Per Board Policy, the Monitor has the authority to take complaints from anyone with information about allegations of violations of integrity occurring within the greater Bond Construction Program, including BuildLACCD, and at any of the District’s nine college campuses where Bond-funded construction projects are occurring. 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 oversight mechanism responsible for helping to ensure 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 District to serve as the Interim BPM on a one-year contract. On April 2, 2025, the District Board of Trustees (“BoT”) approved the award of a five-year contract to AMI to continue to serve as the formal Bond Program Monitor. 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

The OBPM began the period of July 1<sup>st</sup> through December 31<sup>st</sup>, 2025 (the “Period”), with fifteen active investigations open. During the period, the OBPM closed five of the investigations, and also issued two Preliminary Determination reports to the District. Of the remaining eight matters, six were moved to pending either Closure Memos or Preliminary Determination reports (“PD Reports”). At the close of the Period on December 31, 2025, two investigations remained open. During the Period, the OBPM received a total of seven new complaints via its hotline reporting channels, or directly from District officials.

The Monitor has continued to issue monthly updates to the District Chancellor; issued memos 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 (“the Program”); and continuously met and conferred with District and BuildLACCD officials.

This Period, the OBPM team continued their outreach to the campus CPT’s across different colleges 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.

In addition, the OBPM team continued its regular cadence of holding scheduled calls with KPMG, the District’s Bond Performance Auditor and BDO, BuildLACCD’s Internal Audit function. These regular touch-points allow the Office of the BPM to coordinate and create synergies of oversight of the greater Bond Construction program.



## Summary of Activities of the Bond Program Monitor July 1 – December 31, 2025

### I. Hotline

The BPM's dedicated website, [LACCDBondProgrammonitor.org](http://LACCDBondProgrammonitor.org) 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.

### II. Summary of Activities of the Bond Program Monitor [July 1 – December 31, 2025]

- The Office of the BPM currently has two open investigations, six investigations that have moved into pending report or closure memo status, and seven investigations that were closed: two with Preliminary Determinations for possible additional action and five with recommendations, but no further investigation was deemed necessary. (*See Sections IV and V below*).
- Members of the Office of the BPM have been attending relevant District meetings and conferring with stakeholders.
- Members of the Office of the BPM have been conducting interviews, issuing Requests for Information (RFI's) related to Bond Program complaints and investigations.
- Members of the Office of the BPM continued to meet and communicate with District leaders, including the Chancellor and Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive.



### III. Number of Complaints Received This Period

During this Period, the Office of the BPM received a total of seven new complaints:

**July:** The OBPM received one complaint alleging incompetency and fraud by a contractor at one of the college campuses. The complaint was found to lack evidence or merit and no investigation was opened.

**August:** The Office of the BPM received one complaint through its Hotline in the month of August 2025. The whistleblower categorized the nature of the complaint as spurious change orders. Unfortunately, the complainant provided no information, leaving no written message. The Office of the BPM attempted to contact the individual through the anonymous contact channel but received no response. Given the lack of detail or information, the Office of the BPM elected not to open an investigation at this time.

**September:** The Office of the BPM received two complaints in the month of September 2025: The first complaint came through the BPM Hotline. The whistleblower categorized the nature of the complaint as illegal lobbying/political solicitation/undue influence alleging that campaign contributions were received in exchange for the award of contracts. The Office of the BPM attempted to contact the individual through the anonymous contact channel but received no response. Given the absence of meaningful details and a response from the complainant, the Office of the BPM chose not to open an investigation.

The second complaint was a referral by Dr. Leigh Sata, the District's Facilities Executive that was brought to his attention during the public comments section of LACCD's board meeting on September 10, 2025. The complaint concerned one of LACCD's subcontractors, who alleged irregularities and unfair practices in the procurement process at ELAC. Following a preliminary review of the alleged complaint, the Office of the BPM determined that the matter warrants further fact-finding. As the complaint was not directly submitted through the BPM Hotline, the Office of the BPM sought written approval from the Chancellor to initiate an investigation into the matter. Permission was granted.



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**October:** The Office of the BPM received one complaint through its Hotline in the month of October 2025. The whistleblower categorized the nature of the complaint as “Non-Compliance with LACCD Ethical Code or Directives”. The complainant alleged that a vendor to the Program misrepresented the duration of validity of its workers’ compensation insurance coverage, thereby providing false information regarding its qualification under a Request for Qualification (RFQ) for the Program. The Office of the BPM conducted a preliminary review of the allegation and determined the complaint to be without merit. The Office of the BPM subsequently elected not to open an investigation.

**November:** The Office of the BPM received two complaints in the month of November 2025. Both complaints came through the BPM hotline:

The first complaint categorized as “Damage to BuildLACCD or LACCD [Property or Reputation]” concerned a vendor to the Program who alleged dismissive and deceptive action and behavior by individuals within campus-level teams. The OBPM is continuing its current triage of the complaint. Once completed, it will make a determination as to the merit of the complaint.

The second complaint related to a contractor for BuildLACCD who has allegedly misrepresented their qualifications to inappropriately secure a contract with the Program. Should the review determine that the allegations have merit the Office of the BPM will open an investigation.

**December:**

No complaints were received in the month of December 2025.

#### **IV. Number of Investigations Moved to Preliminary Determination or Closed/Resolved This Period**

During the Period, the Office of the BPM closed five matters and issued two Preliminary Determination reports, with recommendations for consideration to the District. These matters were related to the following categories:



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- a) Two investigations that were ultimately conjoined examined allegations of inappropriate tasks assigned to interns and failure to pay mandated minimum hourly wage rates to interns. The investigation did find merit in some of the allegations and both remedial actions were prompted, as well as the OBPM issuing recommendations to the District on closing identified control gaps.
- b) One investigation relating to a third-party alleged to be abusing their office resulting in a negative impact to the Program was closed after the party in question ceased to be involved with District projects.
- c) An investigation into allegations of a vendor failing to perform their specified functions relating to a project at ELAC-SE causing unnecessary delays and driving up costs along with secondary allegations of the Program failing to accurately report on certain potentially hazardous conditions of the project was closed. The OBPM did not find all of the allegations to be accurate, but did issue recommendations to the District relating to improving communications and obtaining guidance from the relevant State regulator.
- d) An investigation into allegations of projects at two campuses being purposely redesigned to make them more attractive for renting to third-parties, non-compliant with Prop 39, was closed. The OBPM identified some evidence of over-zealous design efforts, but definitive evidence was not found. The OBPM issued recommendations to the District for improved oversight of projects and proposed design changes.
- e) An investigation involving allegations of unfair wage and hour conditions for laborers on Program job sites. After extensive investigation into the allegations, no evidence of the alleged conditions was identified and the matter was closed.

During this Period, the OBPM issued two Preliminary Determination reports to the District. These PD's represent findings that warrant additional actions by the District, or where a second phase of investigation may be warranted.



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Two Preliminary Determinations from the prior Period remain in Preliminary Determination status due to the complexities surrounding these matters:

- The first matter concerned the results of the BPM’s fact-finding into allegations of a District employee abusing their position to direct contracts to a vendor on the Bond Program they subsequently went to work for, and for unauthorized activities relating to the PMO re-compete process. The Preliminary Determination report issued by the Office of the BPM on the matter is currently under review by the District.
- The second matter is related to potential violations of the Levine Act. The OBPM received questions about the accuracy of the OBPM report from District Trustees and their personal counsel. In response to questions from the Trustees, the OBPM sought an external review of its initial findings of the Preliminary Determination report by independent political campaign finance counsel during this Period. The OBPM is currently finalizing the report and will share it with the District, prior to issuing a formal Report of Investigation (ROI).

## V. Number of Investigations Currently On-Going

Two investigations are currently ongoing as of December 31, 2025, and six investigations have moved into pending report or closure memo status. The Office of the BPM is actively fact-gathering for the two investigations. 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.
2. Allegations of favoring certain product brands and vendors and inappropriately imposing them upon the Program’s contractors performing work for BuildLACCD.

The OBPM takes this opportunity to remind readers that it takes due process seriously. No matter how serious allegations of wrongdoing may appear at the time they are made to the Monitor, even if there are



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multiple allegations of the same infractions or misconduct, this does not, in and of itself, constitute proof of guilt. The OBPM takes as much time as needed to conduct sufficient fact-gathering to ensure a fair process for all concerned.

## **VI. Number of Matters Referred to Prosecutorial Authorities**

No matters from the Office of the BPM have been referred to prosecutorial authorities this Quarter.

## **VII. Number of Prosecutions, Convictions, Recoveries from Referred Matters**

No prosecutions, convictions, or recoveries from past or referred matters from the Office of the BPM occurred during this period.

## **VIII. Number of Matters Referred for Civil or Administrative Remedy**

No matters from the Office of the BPM were referred for civil or administrative remedy this period.

## **IX. 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 were related to specific investigations and/or information suggesting fraud, waste or abuse.

## **X. Follow-Up Requests Received from the Board of Trustees**

The District requested the BPM provide a second follow-up letter to the BoT regarding findings in a Preliminary Determination report related to potential violations of the Levine Act that was provided to the District during the past quarter. The follow-up letter was shared with the BoT on October 2, 2025.



## **XI. Program Changes**

Following the delivery of a draft investigative report, in late July 2025, the District exercised its contractual right to request a change to the serving named Monitor. In order to prevent any disruption to ongoing critical activities of the Office of the BPM and anticipating a very short term of service until a new named leader of the monitoring team could be made, AMI assigned a member of the Office of the BPM to serve as an interim BPM (“IM”) until a permanent BPM could be appointed. During the Period, AMI presented to the Chancellor a number of candidates to assume the named Monitor role, but as of December 31, 2025, no candidate had been selected. The IM subsequently stepped down. At the time of this writing, the District and AMI continue to work together to identify someone to fill the named role. In the meantime, AMI and its professionals continue to fulfill all the duties of the OBPM.

In October 2025, District Chancellor, Dr. Román, instructed the OBPM that any complaints received outside of the OBPM’s hotline require District review before an investigation may be opened to ensure they fall within the purview of the OBPM.

Additional changes include instruction to the OBPM on closing cases the District does not feel warrant continued investigation.

## **XII. OBPM Meetings Held with District Officials, Leaders & Stakeholders**

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

- The OBPM attended virtually the July 2, 2025, BoT meeting
- The OBPM team met with the CPT of WLAC on 6 August 2025
- The OBPM team met with personnel from the PMO on 11 August 2025
- The OBPM team met with external Bond Counsel, Sima Salek on 22 August 2025



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- The OBPM team held their quarterly call with the Bond Performance Auditor, KPMG on 25 August 2025
- The OBPM team met with the CPT of Pierce College on 26 August 2025
- The OBPM team met with CPT at ELAC-SE on 27 August 2025
- The OBPM team met with personnel from the PMO on September 16, 2025
- The OBPM team attended District FMPOC meetings on 20 August, September 17, October 15, and November 19, 2025.
- The BPM or Interim BPM held the regular standing monthly calls with District Chancellor, Dr. Román on July 15, August 19, September 16, October 21, and December 16, 2025.
- The BPM team held regular communications with the CPTs at many of the colleges throughout the reporting period.
- The BPM team have held regular correspondence with individuals from BuildLACCD's PMO, and campus CPTs throughout this Quarter.

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 help keep the District Bond Construction program operating with ethics and integrity.

Questions to the Office of the BPM may be directed to:

[Monitor@LACCDBondProgramMonitor.org](mailto:Monitor@LACCDBondProgramMonitor.org)

**LACCD Bond Program Monitor**