



REPORT OF THE LOS ANGELES COMMUNITY COLLEGE DISTRICT BOND PROGRAM MONITOR

**2025 Q2 Activities
April 1 – June 30, 2025**





**2025 Second Quarterly Report of the Activities of Bond Program Monitor
(April 1 – June 30, 2025)**



**Affiliated Monitors, Inc.
LACCD Bond Program Monitor**

September 15, 2025

Office of the Bond Program Monitor

1200 S Brand Blvd., #401

Glendale, CA 91204

LACCDBondProgrammonitor.org

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”) Bond Program Monitor (the “BPM”) during the second Quarter of 2025 (April 1st through June 30th, 2025) (the “Quarter”). The BPM serves to monitor on behalf 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.

The Monitor has the power to take complaints from anyone with information about allegations 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.

Executive Summary

During the period of April 1st through June 30th, 2025 (“activity period” or the “Quarter”), the BPM has been investigating sixteen open matters. During the Quarter, three of these investigations moved into pending report status, and two investigations moved into Preliminary Determination status. 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



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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 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 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 and create synergies of oversight of the greater Bond Construction program.

I. Summary of Activities of the Bond Program Monitor [April 1 – June 30, 2025]

- The Office of the BPM currently has thirteen open investigations, three investigations that have moved into pending report status, and two investigations that have moved to Preliminary Determination status. (*See Sections III - V below*).
- Members of the Office of the BPM have been attending relevant District meetings and conferring with stakeholders.
- The Office of the BPM scheduled a series of meetings with District Colleges. These meetings have occurred across the Quarter. Members of the BPM investigative team have established a quarterly schedule that ensures the BPM team visits all nine-college campuses to meet with CPTLs, observe activities and walk active project sites at least once every quarter.
- The BPM team has been conducting interviews and issuing Requests for Information (RFI's) related to Bond Program complaints and investigations.



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- The District assigned external Bond counsel (“EBC”) to the Office of the Bond Program Monitor in April 2024. EBC does not work for the BPM and legal privilege is between the EBC and the District. However, the District has indicated it wants the EBC to be a continuous presence in the activities of the BPM.
- The BPM continued to meet and communicate with District leaders, including the Chancellor, 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 been working on new cards with the hotline information to be distributed broadly. The BPM has also provided an information sheet about the Office of the BPM and how to report anonymously to the hotline that is now being added to all new-hire on-boarding packets at BuildLACCD.

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.

III. Number of Complaints Received This Period

In this Quarter, the OBPM received a total of eleven new complaints:



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April: The BPM received four complaints in April 2025. The first complaint, relating to an active vendor with the Bond Program, alleged potential conflict of interest, retaliation, and waste of Bond Program resources. The allegation came with substantiating support and the Office of the BPM opened an investigation.

The second complaint received related to a prior Bond Program vendor. The vendor has not been active with the District Build program for nearly a decade and thus did not warrant further investigation.

The third complaint alleged a BP vendor of failing to perform as required, falsifying information, and intentionally obfuscating risks to the District in the project for which it is contracted. The BPM found merit in the allegation and opened an investigation.

The fourth complaint initially alleged only that a prime contractor was not paying its subs. The BPM declined to open an investigation, directing the complainant to the PMO.

May: The OBPM received five new complaints in May 2025. The first complaint alleged multiple forms of discrimination with negative impacts relating to contracting. After corresponding with the complainant, the complainant indicated they had decided to take their complaint to the U.S. Equal Employment Opportunity Commission (EEOC). The BPM therefore declined to open an investigation.

The second complaint came from a whistleblower categorizing the nature of their complaint as “bid-rigging.” However, the message and information conveyed by the complainant contained erroneous information and appeared to lack merit. The BPM contacted the complainant via the anonymous channel that allows questions to be asked of the complainant without them revealing their identity to the Monitor. However, the complainant did not respond to these questions. The BPM subsequently elected not to open an investigation at this time.

The third and fourth complaints came from two different whistleblowers, but both contained the same allegations about the same parties and contained substantiating supporting documents. The matter relates



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to Prop 39 violations within the Bond Program and efforts to intentionally deceive how Bond funds are spent. The BPM consolidated the complaints and opened an investigation.

The fifth complaint categorized the nature of their complaint as “bid-rigging” and alleged the circumvention of contract awarding processes within the Bond Program. The complainant appears to have misunderstood how some of the Bond Program bench contracting and staffing processes work. Unfortunately, the message was not entirely coherent and did not provide supporting information. The BPM contacted the whistleblower via the anonymous channel that allows questions to be asked of the complainant without them revealing their identity to the Monitor. However, the complainant did not respond. Given the somewhat confused nature of the allegation and the lack of response with further details, the BPM elected not to open an investigation at this time.

June: The BPM received two new complaints in June 2025: The first complaint of this month came to the Monitor via a written submission posted to the District ESC mailroom. The complainant alleged general irregularities in the re-compete of the BuildLACCD PMO contract. They also made a number of general allegations which can loosely be portrayed as a complaint about inconsistent and unjustified qualification decisions for hiring and a hostile work environment. However, there were no specific examples provided. The BPM has not opened an investigation into the matter in the absence of meaningful details and a response from the complainant.

In the second complaint that came through the Monitor Hotline, the whistleblower categorized the nature of the complaint as ‘fraud, embezzlement, and other financial malfeasance.’ However, the complainant provided no information, leaving no written message. The call contained no voice recording, only static. Given the lack of detail or information, the BPM elected not to open an investigation at this time.

The BPM treats all complaints received very seriously and gives them full attention prior to determining whether an investigation is warranted. The BPM encourages those who contact the Monitor’s Whistleblower Hotline to provide details sufficient to allow follow-up on the allegation(s).



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

Two matters are currently in Preliminary Determination status. During the reporting period, the BPM delivered a Preliminary Determination report to the District. The report relates to the results of the BPM's fact-finding into allegations of a District employee abusing their position to direct contracts to vendor on the Bond Program they subsequently went to work for, and for unauthorized activities relating to the PMO re-compete process. Since the issuance of the Preliminary Determination report, the BPM collected additional information on the case and conducted multiple discussions with the relevant departments in the District and the PMO. Given the complexity of the matter, and following consultations with the District, new data potentially relevant to the case has been identified. The BPM will continue reviewing and analyzing the data to determine whether it is responsive to the investigation and may inform the District's course of action on the matter.

The second matter is related to potential violations of the Levine Act. During the reporting period, the BPM delivered a Preliminary Determination report on the case to the District. It is anticipated that a summary report with supporting documentation will now be shared with the Fair Political Practices Commission (FPPC) for their consideration. Any enforcement actions will be left to the FPPC to undertake.

V. Number of Investigations Currently On-Going

Thirteen investigations are currently ongoing as of the second Quarter of 2025: three of these investigations have moved into pending report status and two others have moved to Preliminary Determination status.

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



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1. Allegations of Build and/or District employees engaging in conflicts of interest or financial self-dealing. Some of these activities could rise to possible criminal violations, while others may 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.
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 that are non-compliant with Prop 39 and/or a misuse of Program resources.
5. Allegations of 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 serious allegations of wrong-doing may appear at the time they are made to the Monitor, even if there are multiple allegations of the same infractions or misconduct, this does not, in and of itself, constitute proof of guilt. The BPM takes as much time as needed to conduct sufficient fact-gathering to ensure a fair process to 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. However, the BPM anticipates that it may formally recommend the District refer to the FPPC any potential violations of the California Political Reform Act upon issuance of one or more of its investigative findings.



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 or 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

No requests from the District Board of Trustees have been received during this reporting period.

XI. 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 team met with the CPT team at Pierce College on April 1, 2025
- The BPM attended the District Board of Trustees meeting on April 2, 2025



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- The BPM held its regular standing monthly calls with District Chancellor, Dr. Roman, on April 15, May 20, and June 17, 2025.
- The BPM attended at the DCOC meeting on April 25, 2025
- The BPM and her team met with the CPT team at Valley College on May 1, 2025.
- The BPM held its regular standing monthly call with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive on May 5, 2025.
- The BPM attended the District Board of Trustees meeting virtually on May 7, 2025.
- The BPM met with the Chancellor, OGC, and external Bond Counsel on May 14, 2025.
- The BPM team held regular communications with the CPTs at many of the colleges throughout the month of May.
- The BPM held her regular monthly call with the PMO Internal Audit function, BDO on May 20, 2025.
- The BPM attended virtually the FMPOC meeting on May 21, 2025.
- The BPM held her quarterly call with the Bond Performance Audit team from KPMG on May 22, 2025.
- The BPM met with ELAC faculty on May 28, 2025.
- The BPM and her team met with the CPT team at Valley College on June 1, 2025.
- The BPM held its regular standing monthly call with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive on June 2, 2025.
- The BPM met with Bond Counsel, Sima Salek on June 16, 2025.
- The BPM attended the District Board of Trustees meeting virtually on June 18, 2025.
- The BPM team held regular communications with the CPTs at many of the colleges throughout the month of June and met with members of the CPT team at several colleges, including at Valley College, Pierce College, and from the PMO office June 3, 12, 18 and 25, 2025
- The BPM held several discussions/communications with the Chancellor in the month of June 2025.



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- The BPM and her team have held regular correspondence with individuals from BuildLACCD's PMO, and campus CPTs throughout the month of June.
- The BPM held her regular monthly call with the PMO Internal Audit function, BDO on June 24, 2025.
- The BPM held its regular standing monthly calls with Dr. Leigh Sata, Vice Chancellor/Chief Facilities Executive
- The BPM team held regular communications with the CPTs at many of the colleges throughout the reporting period.

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 and insights about projects. Together, we can all help keep the District Bond Construction program operating with the level of ethics and integrity that the public demands.

Questions to the Office of the BPM may be directed to: Monitor@LACCDBondProgramMonitor.org

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