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October 19, 2019

VIA EMAIL

Ms. Oynx Jones  
Chief Financial Officer  
City of Culver City—City Hall  
9770 Culver Boulevard  
Culver City, CA 90232

Re: Culver City's Newly-Established FWA Hotline

Dear Ms. Jones:

Congratulations on your progress in establishing Culver City's anonymous Fraud, Waste and Abuse Hotline (<https://www.culvercity.org/how-do-i/report/report-fraud-waste-and-abuse-of-city-resources>).

After reviewing the newly-established web page, some questions arise. The following comments are set forth to assist you with your endeavors—ideas are free.

- (1) The web page mentions a telephone hotline, but no telephone number is set forth.
- (2) The web page states, in part: "**Please do not use this program** to report ... employee misconduct, which should be reported to Human Resources." (Emphasis in original.) However, the whole purpose of the hotline is to report employee and management *misconduct*.
- (3) The reporting page states, in part: "Reports are submitted by Lighthouse to the organization's designee, and may or may not be investigated at the sole discretion of the organization." (Emphasis added.)

This process seems to render the effectiveness of Culver City's FWA Hotline suspect, at best. Reports are submitted to the "organization's designee." Who is the person or his or her title? What are the person's duties except to receive the reports? "Sole discretion" is not reasonable discretion, but unfettered discretion, even if the decision is unreasonable or corrupt. The decision to proceed to investigation seems not to rest with the "organization's designee," but with "the organization." Who, within "the organization," makes the decision to "investigate," and how is that decision made? Assuming an investigation results in the findings of fraud, waste or abuse, then what?

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Until the aforesaid details are resolved and formal procedures established, employees and the public might greet Culver City's FWA Hotline with skepticism.

As you know, my wife and I have a great interest in making Culver City's FWA Hotline successful. It would be our pleasure to meet with you, at your convenience, to discuss the foregoing issues. As a former Compliance Director of a New York Stock Exchange Member Firm, I established and maintained networks to ferret out fraud, waste and abuse.

Please communicate with me if further information is desired.

Yours truly,

LES GREENBERG

LG:pg

ec: Alex Fisch, Council Member, Ad Hoc Subcommittee on Internal Controls  
Thomas Aujero Small, Council Member, Ad Hoc Subcommittee on Internal Controls  
Meghan Sahli-Wells, Mayor  
Göran Eriksson, Vice Mayor  
Daniel Lee, Council Member  
Mr. John Nachbar, City Manager  
Ms. Carol A. Schwab, City Attorney  
Ms. Jane Leonard, Chair, Finance Advisory Committee