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October 13, 2020

Via Email Only

Les Greenberg
plgreen@att.net

Re: Complaint Letter Dated September 22, 2020

Dear Mr. Greenberg:

Thank you for your letter dated September 22, 2020 regarding a complaint against City Council Member Thomas Small, alleging his receipt of a gift from Michael Hackman and/or Hackman Capital Partners LLP (collectively, "HCP"), in violation of Culver City Council Policies 4003 and 4006. We have completed our review of that complaint.

From your letter, it is unclear what "gift" you are alleging Council Member Small received. If your reference to a "gift" was intended to be a salary the Council Member received from HCP or Culver City Forward ("CCF"), then please be advised any salary received by Council Member Small is not a "gift". Rather, it would be considered a "source of income" for purposes of evaluating any potential conflict of interest under the Fair Political Practices Commission (FPPC) regulations. If your allegation was regarding some other consideration the Council Member received from HCP or CCF, then please provide information as to that alleged "gift."

Unless we hear from you regarding an alleged "gift" to Council Member Small, the City's response to your complaint will be considered completed.

Sincerely,

Heather Baker
Assistant City Attorney