

Law Office of
LES GREENBERG
10732 Farragut Drive
Culver City, California 90230-4105
Tele. (310) 838-8105
E-Mail: LGreenberg@LGEsquire.com

December 31, 2019

VIA EMAIL

Ms. Meghan Sahli-Wells
Mayor
City of Culver City—City Hall
9770 Culver Boulevard
Culver City, CA 90232

Re: Fraud, Waste, and Abuse Hotline
Investigation

Dear Ms. Sahli-Wells:

Thank you for your December 18, 2019 letter. This letter responds to that letter, and provides supplemental information, which I obtained by way of Culver City's response to my November 19, 2019 Public Records Act (PRA) request. The documents demonstrate Staff specifically ignored: (1) Moss Adams LLP's longstanding recommendation that the Internal Auditor manage the fraud, waste, and abuse hotline (FWA Hotline); and (2) Moss's September 10, 2019 explicit "best practice and industry standard" reminder. Further, Staff cannot produce any writing that explains the nature of the alleged "pilot program" by which City Attorney Carol Schwab and City Manager John Nachbar secretly seized control of the FWA Hotline.

I. Response to Letter

A. Investigation

I am pleased to learn that Culver City "will take *appropriate* measures to investigate [my] allegations." (Emphasis added.) Whether labeled a "whistle-blower" or watchdog complaint, the underlying facts and allegations remain the same.

Essentially, I allege that Schwab and Nachbar failed to install Moss (Internal Auditor) to manage the FWA Hotline and, instead, Schwab and Nachbar installed themselves and their subordinates. That act is contrary to: (1) the longstanding plan and authorizations of the Finance Advisory Committee, Ad-Hoc Subcommittee on Internal Controls and the City Council; and (2) "The City['s] commit[ment] to fully implement[] a Fraud, Waste and Abuse Program per the recommendations of Moss Adams."

How the City Council defines "appropriate" with respect to its promise of an "appropriate investigation" is critical. In my opinion, only an independent "investigation" would be credible. The "investigation" could be short as the City Council Members know what they did and did not authorize.

Further, any City-Council authorization to alter its "commit[ment]" should have been part of the public record. But there is no such record. Thus, neither Schwab nor Nachbar was authorized to deviate from causing the Internal Auditor to manage the FWA Hotline.

B. Using the Current Hotline

You "note that fraud, waste and abuse may also be reported" using the current FWA Hotline. Considering the named accused, use of the current FWA Hotline would be unreasonable and problematic.

The Culver City-Lighthouse Services LLC (Lighthouse) contract (Addendum A – Report Recipients and User Type) designates Schwab as an "Investigator," and Onyx Jones and Serena Wright, each of whom reports the Nachbar, as an "Investigator." Further, the Addendum states "**Alternate Routing Instructions** If a recipient for reports above is named as an offender in a report you may provide alternate routing instructions here: [blank]." (Emphasis in original.) Because the contract lacks alternate routing instructions, if a complaint is lodged against Schwab, she would be informed of the complaint and have the opportunity to dominate any investigation.

Thus, in effect, you ask me to rely upon persons against whom I complain to investigate themselves.

II. Supplemental Information

Using a PRA request, I have investigated Moss's statement at pages 41-42 of the *City of Culver City Enterprise Risk Assessment* (November 15, 2019)(ERA Report), to-wit:

The City has committed to fully implementing a Fraud, Waste and Abuse Program per the recommendations of Moss Adams. ... The City reports in October 2019 that they are in final contract review with a whistleblower hotline service provider. ... Once the contract has been approved, the City plans to first conduct a pilot program, which will initially direct any reports or calls to the City Attorney's Office. Based on the activity during the pilot program, the City will implement a full roll-out of the hotline. (Emphasis added.)

One of Moss's recommendations is Culver City's Internal Auditor manage the FWA Hotline. Moss is currently the Internal Auditor. The recommendation and "commit[ment]" were initially set forth in Moss's June 30, 2017 "Fraud, Waste and Abuse Program" report. Schwab

and Nachbar caused Culver City to enter into a contract with Lighthouse where the terms violated the "commit[ment]."

Culver City's response to my PRA request reveals the "City Attorney's Office" has taken unfettered control over the FWA Hotline and any purported "pilot program" is a sham:

6. All records identifying the person(s) designated as "the City Attorney's Office." (There are no documents responsive to this request).
7. All records setting forth the meaning of and/or criteria associated with "[b]ased on the activity." (There are no documents responsive to this request).
8. All records setting forth the meaning of and/or criteria associated with "during the pilot program." (There are no documents responsive to this request).
9. All records setting forth the meaning of and/or criteria associated with "a full roll-out [of the hotline]." (There are no documents responsive to this request).

These PRA responses demonstrate that Culver City falsely represented that "The City has committed to fully implementing a Fraud, Waste and Abuse Program per the recommendations of Moss Adams."

After initiating the "pilot program," management of the FWA Hotline was delegated to Punit Chokshi (Management Analyst), and has run amuck. His email address is "Internal Controls<internal.controls@culvercity.org." (PRA Response 9, attached.) Thus, per the Addendum, he receives reports from Lighthouse instead of "Onyx Jones - Chief Financial Officer," who is a designated recipient.

On July 11, 2019, Chokshi asked Jones "[w]ill there be only Moss," or the "City Attorney's office too" should receive reports from Lighthouse. (PRA Response 15, attached.) The record trail suspiciously ends there without revealing the advice Chokshi received. A few minutes after his first email, Chokshi asked Moss for its "contact information" as he had "to provide the list of recipients to Lighthouse for receiving the FWA complaint reports." (PRA Response 1, attached.) Thus, at the least, Chokshi knew that only Moss should be designated to receive Lighthouse's reports.

On September 10, 2019, one day after the City Council meeting where the City Council accepted Moss's FWA Program report, Moss wrote to Jones and Chokshi. (PRA Response 4, attached.) Moss wrote, in part, "One item I wanted to comment on is the Ethics Hotline. It is best practice and industry standard for reports received by the third-party hotline provider (Lighthouse in this case) to go to the Internal Auditor for evaluation and dissemination, which ensures independence and protects confidentiality. ... Lighthouse will provide you with a form to input designate email addresses for dissemination purposes. You can provide my email address." Staff ignored that reminder.

On October 14, 2019, Jones designated Chokshi—a Management Analyst—instead of herself as Lighthouse's "Primary Contact." "Primary Contact—The individual who will have

primary responsibility for your hotline program. ... [T]hey will manage who the report recipients are.... There can only be one primary contact." (PRA Response 12, attached.) Neither Culver City nor Lighthouse may modify their contract without a document signed by all parties.¹ Culver City produced no document signed by all parties that allows Chokshi any control over the FWA Hotline.

Two days later, at the Finance Advisory Committee (FAC) meeting, Chokshi reported that Culver City and Lighthouse had entered into a service contract. He failed to report any detail of the contract or his role.

On November 14, 2019, after my first letter of complaint to the FAC, Chokshi acknowledged Moss's then-current lack of involvement when writing to Moss by stating, "[i]f we designate [Moss] as our recipients for receiving the reports from Lighthouse (FWA Hotline)." (Emphasis added; PRA Response 1, attached.) Chokshi inquired of Moss as to "any fees for receiving/reviewing/investigating the [FWA Hotline] reports." (*Id.*) One can only wonder why Culver City did not already know Moss's "fees" when, years before, it "committed fully to implementing [] recommendations of Moss Adams." Per the response to my PRA request, the document trail incredibly ends there.

At the November 20, 2019 FAC meeting, I complained of Chokshi's lack of candor and the existence of the "pilot program." Jones stated that the "pilot program" was commenced because "things have changed," but it would end by March 2020. The FAC voted to convey that information to the City Council.

III. City Council's Potential-Positive Legacy

The Culver City City Council has the opportunity to seize the moral high ground and leave a legacy of protecting residents and the City from potential fraud, waste, and abuse. Culver City is near the last, if not the last, nearby city to establish a FWA Hotline. Hopefully, the City Council will avail itself of the opportunity to establish an effective FWA Hotline that all residents can view with respect and utilize when necessary.

An internal "investigation" proceeding at a glacial pace would lead to increased lack of confidence in and further distrust of government. In particular, the City Council would undermine its own credibility associated with efforts to fight fraud, waste, and abuse. Furthermore, failure to reprimand all those who knowingly deviated from the well-established and longstanding plan would produce a similar result.

Additionally, the City Council should investigate how Moss's ERA Report came to include obviously empty statements about the purported "pilot program." One should question

¹ "20. MODIFICATION OF AGREEMENT. This Agreement may not be modified, nor may any of the terms, provisions or conditions be modified or waived or otherwise affected, except by a written amendment signed by all parties hereto."

Ms. Meghan Sahli-Wells
City Council
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any alleged need for a "pilot program" when the original "commit[ment]" allegedly remains unchanged. In response to my PRA request, Staff failed to produce any record showing how Moss learned that a "pilot program" exists. Moss and Staff hold "bi-weekly conference calls." (PRA Response 1.) It is incredible each of the calls was not memorialized in any manner; however, no such record exists.

The most direct solution would be to follow the original plan by appointing Moss—Culver City's current Internal Auditor—to manage the FWA Hotline.

Truly yours,

LES GREENBERG

LG:pg

Attachments

ec: Göran Eriksson, Vice Mayor
 Alex Fisch, Council Member, Ad Hoc Subcommittee on Internal Controls
 Daniel Lee, Council Member
 Thomas Aujero Small, Council Member, Ad Hoc Subcommittee on Internal Controls
 Mr. John Nachbar, City Manager
 Ms. Carol A. Schwab, City Attorney
 Ms. Oynx Jones, Chief Financial Officer
 Mr. Punit Chokshi, Management Analyst

From: [Chokshi, Punit](#)
To: [Mark Steranka](#); [Colleen Rozillis](#)
Cc: [Jones, Onyx](#)
Subject: RE: Culver City - FWA Report Recipient
Date: Thursday, [November 14, 2019](#) 11:04:13 AM

Good Morning Mark,

If we designate you as our recipients for receiving the reports from Lighthouse (FWA Hotline), will there be any fees for receiving/reviewing/investigating the reports? If there is a fee, we would like to discuss the fee structure in our bi-weekly conference call which is scheduled for tomorrow at 1 PM. .

Thank you,

Punit Chokshi

Finance Department
City of Culver City
(310) 253-5835

From: Mark Steranka <Mark.Steranka@mossadams.com>
Sent: Tuesday, [July 16, 2019 5:46 PM](#)
To: Chokshi, Punit <punit.chokshi@culvercity.org>; Colleen Rozillis <Colleen.Rozillis@mossadams.com>
Cc: Jones, Onyx <Onyx.Jones@culvercity.org>
Subject: Re: Culver City - FWA Report Recipient

Punit,

Sorry. I don't have computer access at the moment since driving. [Could you add my contact info to form? Thanks much.](#)

Mark Steranka
Partner | Moss Adams
Business Consulting Services

999 Third Avenue, Suite 2800
Seattle, WA 98104
D (206) 302-6409
M (206) 890-3627

From: "Chokshi, Punit" <punit.chokshi@culvercity.org>
Sent: Tuesday, July 16, 2019 5:34 PM
To: Mark Steranka <Mark.Steranka@mossadams.com>, Colleen Rozillis <Colleen.Rozillis@mossadams.com>
CC: "Jones, Onyx" <Onyx.Jones@culvercity.org>

Subject: Culver City - FWA Report Recipient

Hello Mark/Colleen,

Any update on the below request? We need to add this with the contract.

Thank you,

Punit Chokshi

Finance Department
City of Culver City
(310) 253-5835

From: Chokshi, Punit

Sent: Thursday, July 11, 2019 5:17 PM

To: Mark Steranka <Mark.Steranka@mossadams.com>; Colleen Rozillis
<Colleen.Rozillis@mossadams.com>

Cc: Jones, Onyx <Onyx.Jones@culvercity.org>

Subject: Culver City - FWA Report Recipient

Hi Mark/Collin,

We have to provide the list of recipients to Lighthouse for receiving the FWA complaint reports, can you please provide the contact information for Moss Adams on the attached file?

If you have any questions , please let me know.

Thank you,

Punit Chokshi

Finance Department
City of Culver City
(310) 253-5835

The City of Culver City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

From: [Mark Steranka](#)
To: [Jones, Onyx](#)
Cc: [Chokshi, Punit](#); [Colleen Rozillis](#); [Halie Garcia](#)
Subject: Ethics Hotline and FWA Program
Date: Tuesday, September 10, 2019 7:27:55 AM

Onyx,

Great job last night. The Council seemed pleased with the progress and momentum of activities to date relative to the audit program and implementation actions in response by management.

One item I wanted to comment on is the Ethics Hotline. It is best practice and industry standard for reports received by the third-party hotline provider (Lighthouse in this case) to go to the Internal Auditor for evaluation and dissemination, which ensures independence and protects confidentiality. See pages 7 through 9 of the FWA program document, which defines the role of the Internal Auditor as responsible for coordinating the FWA Program, monitoring, triaging complaints, conducting investigations, providing overall oversight as to the progress of complaints received, making reports, and performing follow-up procedures deemed appropriate.

Lighthouse will provide you with a form to input designate email addresses for dissemination purposes. You can provide my email address. I can also help you with ideas for building awareness of the program. For example, for City officials and staff, we typically provide training to the Council and senior management in person and prepare a recorded webcast that all employees can view. This makes it convenient to make this training a requirement (through new employee orientation and ongoing required training).

I look forward to discussing. Thanks very much.

Mark Steranka
Partner | **Moss Adams**
Business Consulting Services

999 Third Avenue, Suite 2800
Seattle, WA 98104
D (206) 302-6409
M (206) 890-3627

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From: Internal Controls
To: Jones, Onyx
Subject: FW: Compliance Hotline - Designated Recipient(s)
Date: Thursday, October 17, 2019 3:43:11 PM
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)
[Lighthouse Brochure.pdf](#)

FYI,

Thank you,

Punit Chokshi

Finance Department
City of Culver City
(310) 253-5835

From: Lighthouse Reports <reports@lighthouse-services.com>
Sent: Monday, October 14, 2019 10:58 AM
To: Internal Controls <internal.controls@culvercity.org>; Schwab, Carol <carol.schwab@culvercity.org>; Wright, Serena <serena.wright@culvercity.org>
Cc: Chokshi, Punit <punit.chokshi@culvercity.org>
Subject: Compliance Hotline - Designated Recipient(s)



Attn: O. Jones, C. Schwab, S. Wright;

Welcome to Lighthouse Services! We are your organization's anonymous compliance hotline provider. City of Culver City has contracted with Lighthouse Services for the provision of anonymous reporting hotline services. You have been identified to us as a designated recipient for reports.

Click [here](#) for a 5-minute video overview of your hotline and how it works.

Your Role as a Designated Recipient in the Reporting Process

As a Designated Recipient for your organization we would like you to become familiar with the reporting process for your hotline.

- You will receive, via email, incident reports for which you are identified as a recipient.
- These incident reports are yours to investigate according to your organization's policy. [Click here](#) to review our whitepaper entitled Best Practices for Handling an Ethics Hotline Report: Developing Policies and Procedures for Conducting an Effective Ethics Investigation.
- Unless the reporter waived their anonymity, the reporter's identity will be removed from incident reports to protect their anonymity.
- Each month you will receive a Hotline Activity Summary Report via email that lists the number of

reports you received the previous month.

- Many organizations use spam blockers or filters. To ensure that emails from Lighthouse Services reach you and your designated recipients, please communicate with your IT department to make sure that our domain [lighthouse-services.com](mailto:reports@lighthouse-services.com) is whitelisted in your spam filters.
- Communication with a reporter or Lighthouse should be entered in the Case Management System (CMS) dialog feature.

If You Have Also Been Added as a User in the Case Management System (CMS)

The Case Management System (CMS) is a database of your organization's hotline activity. If you have already been added as a user, you should have received a welcome email. [Click here](#) to view a video on the CMS capabilities. If you have not been set up as a CMS user and would like to be added as one, please contact your hotline users with Administrator status in the CMS and request that they create a user profile for you.

- If you have Administrator status, you will see all reports that are uploaded into the CMS
- If you have Investigator /non-Administrator status, you will see only those reports to which you have been assigned by an Administrator
- Communication with a reporter or Lighthouse should be entered in the CMS dialog feature. On the "Incident Reports" tab, check the "Dialog Available with Reporter" column for the incident report you are investigating
 - If the word Yes appears, click on it and enter your information or questions in the **"Add Dialog for Reporter"** section to communicate directly with the reporter.
 - If the word No appears, click on it and enter your information or questions in the **"Add Dialog for Lighthouse"** section. If Lighthouse has the reporter's contact information, we will endeavor to contact the reporter on your behalf; otherwise we will keep your instructions on file in the event the reporter requests a status update.
 - Occasionally a reporter will request a status update on their report outside of the CMS dialog feature. In that case we will contact your CMS users via the CMS dialog feature to request an update on their behalf.

A brochure with our hotline program overview is attached. To receive our quarterly newsletter including ethics related topics, please click on the "join our email newsletter" link in the signature line below. Please contact us if you have any questions. Thank you for your assistance.

Regards,
Lighthouse Services, Inc.

Lighthouse Services, Inc.
1710 Walton Road, Suite 204, Blue Bell, PA 19422
Main: 215.884.6150 | Fax: 215.689.3885
email: reports@lighthouse-services.com
website: www.lighthouse-services.com

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From: [Chokshi, Punit](#)
To: [Andy Bronstein](#)
Cc: [Jones, Onyx](#)
Subject: RE: Culver City - Final Contract
Date: Monday, October 14, 2019 9:17:35 AM
Attachments: [image001.png](#)
[image002.png](#)

Onyx has asked me to be a Primary Contact. Please list my name as Primary Contact.

Thank you,

Punit Chokshi

Finance Department
City of Culver City
(310) 253-5835

From: Andy Bronstein <andy@lighthouse-services.com>
Sent: Monday, October 14, 2019 8:29 AM
To: Chokshi, Punit <punit.chokshi@culvercity.org>
Cc: Jones, Onyx <Onyx.Jones@culvercity.org>
Subject: RE: Culver City - Final Contract



Hi Punit,

I am confirming receipt of your signed hotline service agreement. We will be setting up your service within one business day and you will receive various setup emails including program instructions, implementation and communication templates, your hotline information including toll-free number and UR our invoice and instructions on ordering collateral materials. Your designated recipients and CMS users will also receive welcome emails.

Shall we list Onyx Jones as our primary contact? Please confirm

Primary Contact – The individual who will have primary responsibility for your hotline program. By emailing reports@lighthouse-services.com they will manage who the report recipients are and inform us of any changes to your DBAs (Doing Business As). They will also receive email notification of any upgrades to our services, administrative matters and program correspondence. There can only be one primary contact.

We look forward to working with you!

Regards,

Andy

Andy Bronstein

Lighthouse Services, LLC

1710 Walton Road, Suite 204, Blue Bell, PA 19422

Main: 215.884.6150 | Direct 215.589.7158 | Fax: 215.689.3885 | Email: andy@lighthouse-services.com



From: Chokshi, Punit [<mailto:punit.chokshi@culvercity.org>]

Sent: Monday, October 14, 2019 11:10 AM

To: Andy Bronstein <andy@lighthouse-services.com>

Cc: Jones, Onyx <Onyx.Jones@culvercity.org>; Chris Mowery <cmowery@lighthouse-services.com>

Subject: RE: Culver City - Final Contract

Good Morning Andy,

1. Please see the attached file for our final contract signed by all parties. I will mail hard copy to the below address for your record.

Andy Bronstein

Lighthouse Services, LLC

1710 Walton Road, Suite 204, Blue Bell, PA 19422

2. The payment for the services will be issued this week.
3. Please advise on the start date of your services and how can we get your web and phone information to add on our website? We want to start this hotline ASAP and make it available to our employees and residents.

If you have any questions, please let me know.

Thank you,

Punit Chokshi

Finance Department

City of Culver City

(310) 253-5835

From: Chokshi, Punit

Sent: Tuesday, September 24, 2019 7:56 AM
To: Andy Bronstein <andy@lighthouse-services.com>
Cc: Jones, Onyx <Onyx.Jones@culvercity.org>
Subject: RE: Culver City - Final Contract

Please see the below for an email from Chris dated 08/08/19 for requesting Insurance waiver and it was approved by our City Attorney Office.

Thank you,

Punit Chokshi
Finance Department
City of Culver City
(310) 253-5835

From: Andy Bronstein <andy@lighthouse-services.com>
Sent: Tuesday, September 24, 2019 7:37 AM
To: Chokshi, Punit <punit.chokshi@culvercity.org>
Cc: Jones, Onyx <Onyx.Jones@culvercity.org>
Subject: RE: Culver City - Final Contract

Hi Punit,

Thank you for your help. Would it be possible to email me a copy of the insurance waiver?

Andy

Andy Bronstein
Lighthouse Services, LLC
1710 Walton Road, Suite 204, Blue Bell, PA 19422
Main: 215.884.6150 | Direct 215.589.7158 | Fax: 215.689.3885 | Email: andy@lighthouse-services.com



From: Chokshi, Punit [<mailto:punit.chokshi@culvercity.org>]
Sent: Monday, September 23, 2019 7:30 PM
To: Andy Bronstein <andy@lighthouse-services.com>; Chris Mowery <cmowery@lighthouse-services.com>
Cc: Jones, Onyx <Onyx.Jones@culvercity.org>
Subject: Culver City - Final Contract

Hello Andy and Chris,

I was finally able to get your contract with change in name from City Attorney Office. Please see the attached files and review the contract. If everything is fine, please print 2 copies and sign. You must mail me both copies with wet signatures to my attention.

Attn: Punit Chokshi
Finance Department
City of Culver City
9770 Culver Blvd
Culver City, CA 90232

The insurance clause will not be removed from the contract instead we will give you waiver. This waiver is already approved.

If you have any question, please let me know.

Thank you,

Punit Chokshi
Finance Department
City of Culver City
(310) 253-5835

From: Andy Bronstein <andy@lighthouse-services.com>
Sent: Wednesday, September 4, 2019 7:27 AM
To: Chokshi, Punit <punit.chokshi@culvercity.org>
Subject: RE: Request for Waiver of Insurance Requirement

Punit,

I forgot to mention, please change our name to Lighthouse Services, LLC.

Andy

Andy Bronstein
Lighthouse Services, LLC
1710 Walton Road, Suite 204, Blue Bell, PA 19422
Main: 215.884.6150 | Direct 215.589.7158 | Fax: 215.689.3885 | Email: andy@lighthouse-services.com



From: Andy Bronstein

Sent: Wednesday, September 4, 2019 10:14 AM
To: 'punit.chokshi@culvercity.org' <punit.chokshi@culvercity.org>
Subject: FW: Request for Waiver of Insurance Requirement

Hello Punit,

Chris is out of town and I am handling his workload in the interim. I don't see the insurance waiver as we don't comply with Exhibit C, paragraph C because our insurance carrier is not licensed to do business in California. Also, when we sign to whose attention and address do we mail the 2 original copies?

Regards,
Andy

Andy Bronstein
Lighthouse Services, LLC
1710 Walton Road, Suite 204, Blue Bell, PA 19422
Main: 215.884.6150 | Direct 215.589.7158 | Fax: 215.689.3885 | Email: andy@lighthouse-services.com



From: Chokshi, Punit [<mailto:punit.chokshi@culvercity.org>]
Sent: Tuesday, September 3, 2019 6:20 PM
To: Chris Mowery <cmowery@lighthouse-services.com>
Subject: FW: Request for Waiver of Insurance Requirement

Hi Chris,

I hope you had a nice weekend.

Please review the attached final contract and other files. If this meets your requirement, please sign 2 copies and mail it back to us.

If you have any questions, please let us know.

Thank you,

Punit Chokshi
Finance Department
City of Culver City
(310) 253-5835

PRA RESPONSE # 15

From: [Chokshi, Punit](#)
To: [Jones, Onyx](#)
Subject: FW: Lighthouse Services Agreement and Instructions
Date: Thursday, July 11, 2019 4:44:10 PM
Attachments: [image002.png](#)
[image003.png](#)
[-Addendum A.DOCX](#)

Hi Onyx,

We need to complete the attached Addendum A to add with the City contract. We have to provide the list of recipients of the reports from Lighthouse. Will there be only Moss Adams, LLC? Or City Attorney's office too? Can you please advise?

Thank you,

Punit Chokshi
Finance Department
City of Culver City
(310) 253-5835