## Law Office of

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April 14, 2021

## VIA EMAIL

Ms. Carol A. Schwab City Attorney Office of the City Attorney 9770 Culver Boulevard Culver City, CA 90212-0507

## Re: Complaint and Continuing Request for Investigation of Former City Council Member Thomas Small, Etc.

Dear Ms. Schwab:

Receipt of your October 27, 2020 letter is hereby acknowledged. The following sets forth recently discovered information.

In substance, the Michael Hackman-Culver City Forward-Thomas Small relationship was simply a surreptitious means by which to funnel money from Hackman to a City Council Member. The August 26, 2019 City Council Meeting Minutes show that Small voted upon a matter wherein Hackman had a financial interest. Eight months later, Small first publicly disclosed the Hackman-CCF-Small relationship. Those facts should be sufficient to trigger an investigation. To conclude otherwise would set a very negative precedent as to the type of conduct tolerated in Culver City.

I do not suggest any particular law, policy or guideline by which to limit the scope of any investigation. Most probably, an investigation should not be limited to Small or to the events at the aforesaid meeting.

I recently obtained a copy of CCF's 2019 Form 990 (Return of Organization Exempt From Income Tax). In the Form 990, Small states, under penalty of perjury, that during the taxyear beginning March 1, 2019 and ending December 31, 2019:

- (1) CCF received exactly \$300,000.00 in contributions;
- (2) CCF employed only one person—Small—its Chief Executive Officer;
- (3) CCF distributed benefits of \$84,973 to Small—about \$8,500 per month.

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The content of a public-media interview of Small indicates that Hackman and/or his affiliates most probably contributed the entire \$300,000.00 to CCF.

Please communicate with me if further information is desired.

Yours truly,

## LES GREENBERG

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ec: Mr. Alex Fisch, Mayor Mr. John Nachbar, City Manager Ms. Heather Baker, Assistant City Attorney