

BEFORE THE

CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION

In the Matter of:

JESSE ZWICK,

City Councilmember / Mayor Pro Tem,

City of Santa Monica,

Respondent.

SWORN COMPLAINT

Violations of Political Reform Act

Gov. Code §§ 87100, 87103, 87105

Gov. Code § 11430.10 (Ex Parte)

FPPC Regs. 18700, 18704, 18707

I. INTRODUCTION

This sworn complaint is submitted by Mid-Wilshire Neighbors and Santa Monica Neighbors, pursuant to California Government Code section 83115 and FPPC Regulation 18360 et seq.¹

Complainants seek investigation and enforcement action against Respondent Jesse Zwick for violations of the Political Reform Act arising from his participation in the City Council's December 17, 2024 vote approving Development and Disposition Agreements with Hollywood Community Housing Corporation ("HCHC") for properties located at 1217 Euclid Street, 1211-1217 Fourteenth Street, and 1402 Wilshire Boulevard, Santa Monica, CA 90404.

This case presents three independently disqualifying grounds for enforcement action:

First, this Commission has already determined via Advice Letter A-25-153 that Respondent has a disqualifying conflict of interest on housing production decisions due to his employment with the Housing Action Coalition.² The December 17, 2024 HCHC vote was precisely the type of "housing production decision" covered by that ruling.

Second, sworn deposition testimony establishes that HCHC Executive Director Sarah Letts personally contacted **all seven Santa Monica City Council members** on February 7, 2024—**before HCHC was selected as the developer**—to "engage in a conversation" and "answer any questions" about the project.³⁴ Respondent not only received this outreach but accepted a meeting invitation from Letts.⁵

Third, California Public Records Act responses document that Respondent engaged in undisclosed ex parte communications with Sarah Letts **during active City Council proceedings**—including emails sent from the dais while residents provided public comment, and same-day coordination with the applicant on the day of a closed session.⁶⁷

¹Gov. Code § 83115; FPPC Reg. 18360 et seq.

²FPPC Advice Letter A-25-153 (December 8, 2025), available at <https://www.fppc.ca.gov/content/dam/fppc/documents/advice-letters/2025/Final%20A-25-153.pdf>

³Deposition of Sarah Letts, July 7, 2025, First Legal Depositions, p. 63, lines 10-13 ("[A]ll councilmembers, is that your recollection?" "Seven councilmembers.").

⁴Letts Deposition, p. 63, lines 14-18 ("And those emails were sent and the invitation was made by you prior to the -- the Council deciding who the developer was going to be of the project?" "That's correct.").

⁵Letts Deposition, p. 61, lines 24-25 ("And you're introducing yourself to Councilmember Zwick to talk about your project; is that [right]?" "Yes."); p. 62, lines 8-9 ("I think I sent him a meeting invite, and he accepted the meeting invite.").

⁶City of Santa Monica CPRA Response R031384, email from Jesse Zwick to Sarah Letts, June 25, 2024, 6:26 PM: "I'm writing from council, where 30 mid-city neighbors are angrily denouncing the project and possessed with a lot of misinformation."

⁷City of Santa Monica CPRA Response R033709, email from Jesse Zwick to Sarah Letts, August 27, 2024, 6:55 PM: "Is this the course of action you want to pursue, or would you prefer to stick to the original proposal?" Reply from Letts: "We are now fully behind this alternate proposal."

Taken together, these facts establish a pattern of improper coordination with an applicant before and during quasi-judicial proceedings, warranting the Commission's most serious enforcement response.

II. PARTIES

A. Complainants

Mid-Wilshire Neighbors is a collective of residents who live within 2 blocks of the proposed development sites in the Mid-Wilshire area of Santa Monica. Santa Monica Neighbors is a 501(c)(4) organization dedicated to government accountability and transparency.

Complainants have standing because their members are directly affected by the governmental decision at issue, have participated extensively in public proceedings, and have a direct interest in ensuring lawful governmental decision-making.

B. Respondent

Name: Jesse Zwick

Title: City Councilmember / Mayor Pro Tem

Agency: City of Santa Monica

Address: 1685 Main Street, Santa Monica, CA 90401

Email: Jesse.Zwick@santamonica.gov

Outside Employment (Source of Disqualifying Conflict):

Employer: Housing Action Coalition

Title: Southern California Director

Start Date: September 8, 2025

III. FPPC ADVICE LETTER A-25-153 – ESTABLISHED CONFLICT

On December 8, 2025, this Commission issued Advice Letter A-25-153, concluding that Respondent **"has a disqualifying interest and may not take part"** in housing production decisions due to his employment with the Housing Action Coalition.⁸

The Commission found:

"There is a nexus between Councilmember Zwick's duties as the Coalition's paid Director of the Southern California region, and the City decisions that would achieve, further or hinder the Coalition's goal of advocating for housing production as well as its goal of growing its membership and receipt of donations."

While the Advice Letter addresses prospective conduct, the underlying employment relationship and organizational mission alignment that creates the conflict existed at the time of the December 17, 2024 vote. Respondent began employment negotiations with the Housing Action Coalition months before the vote.

IV. SWORN DEPOSITION TESTIMONY – PRE-SELECTION LOBBYING

On July 7, 2025, Sarah Letts, Executive Director of HCHC, gave sworn deposition testimony establishing that she personally contacted **all seven Santa Monica City Council members** on February 7, 2024, **before the Council selected HCHC as the developer.**⁹¹⁰

A. Pre-Selection Outreach to Zwick

Letts testified that she introduced herself to Councilmember Zwick specifically to discuss the HCHC project:

Q: "And you're introducing yourself to Councilmember Zwick to talk about your project; is that [right]?"

⁸FPPC Advice Letter A-25-153 (December 8, 2025), available at <https://www.fppc.ca.gov/content/dam/fppc/documents/advice-letters/2025/Final%20A-25-153.pdf>

⁹Deposition of Sarah Letts, July 7, 2025, First Legal Depositions, p. 63, lines 10-13 ("[A]ll councilmembers, is that your recollection?" "Seven councilmembers.").

¹⁰Letts Deposition, p. 63, lines 14-18 ("And those emails were sent and the invitation was made by you prior to the -- the Council deciding who the developer was going to be of the project?" "That's correct.").

A: "Yes."¹¹

Critically, Letts testified that she sent Zwick a meeting invitation, **which he accepted:**

*"I think I sent him a meeting invite, and he accepted the meeting invite."*¹²

B. Systematic Lobbying of All Seven Council Members

Letts confirmed she sent similar emails to all other Council members:

Q: *"Did you send similar emails to the other councilmembers?"*

A: *"I did."*

Q: *"[A]ll councilmembers, is that your recollection?"*

A: *"Seven councilmembers."*¹³

C. Admitted Purpose: Private Deliberation Before Public Selection

When asked about her intent, Letts stated:

Q: *"What was your intention in sending the February 7th emails to the councilmembers?"*

A: *"To -- to engage in a conversation, to hear their feedback, to answer any questions that they had."*¹⁴

Critically, Letts confirmed these communications occurred BEFORE the Council selected the developer:

Q: *"And those emails were sent and the invitation was made by you prior to the -- the Council deciding who the developer was going to be of the project?"*

A: *"That's correct."*¹⁵

D. Brown Act Concerns Raised in Deposition

The examining attorney specifically inquired about Brown Act ramifications of this pre-selection lobbying:

Q: *"Did anyone ever tell you that that may have had Brown Act ramifications?"*

MS. PASTER: *Objection; calls for a legal [conclusion]."*¹⁶

Significance: This sworn testimony establishes that Respondent engaged in private discussions with the applicant about the project before any public proceedings, accepting a meeting invitation from a developer seeking a \$13.5 million public contract. This pre-selection coordination is precisely the harm that conflict of interest and ex parte rules are designed to prevent.

¹¹Letts Deposition, p. 61, lines 24-25 ("And you're introducing yourself to Councilmember Zwick to talk about your project; is that [right]?" "Yes."); p. 62, lines 8-9 ("I think I sent him a meeting invite, and he accepted the meeting invite.").

¹²Letts Deposition, p. 61, lines 24-25 ("And you're introducing yourself to Councilmember Zwick to talk about your project; is that [right]?" "Yes."); p. 62, lines 8-9 ("I think I sent him a meeting invite, and he accepted the meeting invite.").

¹³Deposition of Sarah Letts, July 7, 2025, First Legal Depositions, p. 63, lines 10-13 ("[A]ll councilmembers, is that your recollection?" "Seven councilmembers.").

¹⁴Letts Deposition, p. 63, lines 6-9 ("What was your intention in sending the February 7th emails to the councilmembers?" "To -- to engage in a conversation, to hear their feedback, to answer any questions that they had.").

¹⁵Letts Deposition, p. 63, lines 14-18 ("And those emails were sent and the invitation was made by you prior to the -- the Council deciding who the developer was going to be of the project?" "That's correct.").

¹⁶Letts Deposition, p. 63, lines 19-21 ("Did anyone ever tell you that that may have had Brown Act ramifications?" Objection by counsel.).

V. DOCUMENTED EX PARTE COMMUNICATIONS DURING PROCEEDINGS

A. The "Misinformation" Email – June 25, 2024 (From the Dais)

CPRA Response R031384 documents an email exchange on June 25, 2024. **The email was sent by Respondent from the dais during an active City Council meeting** while residents were providing public comment opposing the HCHC project.¹⁷

Respondent wrote to Sarah Letts at 6:26 PM:

*"Hi Sarah, I'm writing from council, where 30 mid-city neighbors are angrily denouncing the project and possessed with a lot of misinformation. Hopefully some of it can be cleared up at these meetings... but fair warning I imagine they will be hot."*¹⁸

This communication is damning for multiple reasons: (1) It was sent during an active public meeting while residents exercised their right to participate; (2) It characterized resident concerns as "misinformation," demonstrating pre-judgment; (3) It warned the applicant about community opposition, providing tactical intelligence; and (4) It was never disclosed on the public record.

B. The "Course of Action" Email – August 27, 2024 (Same Day as Closed Session)

CPRA Response R033709 documents another email exchange on August 27, 2024. **This is the same day the City Council held a closed session on the HCHC matter.**^{19,20}

Respondent wrote to Letts at 6:55 PM:

"Hi Sarah, Is this the course of action you want to pursue, or would you prefer to stick to the original proposal?"

Letts replied at 8:00 PM:

*"Good question and thank you for asking. We are now fully behind this alternate proposal."*²¹

This exchange is devastating: On the very day the Council was meeting in closed session to deliberate on HCHC negotiations, Respondent was privately asking the applicant which "course of action" she wanted to pursue—and receiving strategic direction. This constitutes the precise harm that ex parte prohibitions are designed to prevent: private strategizing between an applicant and decision-maker outside public view.

VI. PRIOR RELATIONSHIP WITH HCHC – VENICE DELL PROJECT

Respondent's "intimate knowledge" of HCHC²² predates the Santa Monica proceedings by years. Prior to his election to the Santa Monica City Council, Respondent served as Chief Communications Officer for Los Angeles City Councilmember Mike Bonin (CD11).²³

A. The Venice Dell Project – HCHC as Co-Developer

¹⁷City of Santa Monica CPRA Response R031384, email from Jesse Zwick to Sarah Letts, June 25, 2024, 6:26 PM: "I'm writing from council, where 30 mid-city neighbors are angrily denouncing the project and possessed with a lot of misinformation."

¹⁸City of Santa Monica CPRA Response R031384, email from Jesse Zwick to Sarah Letts, June 25, 2024, 6:26 PM: "I'm writing from council, where 30 mid-city neighbors are angrily denouncing the project and possessed with a lot of misinformation."

¹⁹City of Santa Monica CPRA Response R033709, email from Jesse Zwick to Sarah Letts, August 27, 2024, 6:55 PM: "Is this the course of action you want to pursue, or would you prefer to stick to the original proposal?" Reply from Letts: "We are now fully behind this alternate proposal."

²⁰Santa Monica City Council Meeting, August 27, 2024, Closed Session Agenda Item re: HCHC negotiations.

²¹City of Santa Monica CPRA Response R033709, email from Jesse Zwick to Sarah Letts, August 27, 2024, 6:55 PM: "Is this the course of action you want to pursue, or would you prefer to stick to the original proposal?" Reply from Letts: "We are now fully behind this alternate proposal."

²²Santa Monica City Council Meeting, January 13, 2026, Video Recording, YouTube (<https://www.youtube.com/watch?v=ALioPgiNyc4>), Timestamp 26:01-26:25 (public testimony regarding Zwick's "intimate knowledge" of HCHC).

²³"Former Bonin Advisor Challenged Over Potential Conflicts on Santa Monica Council," Westside Current, December 2, 2025.

In 2016, Hollywood Community Housing Corporation (HCHC) and Venice Community Housing (VCH) were selected as co-developers for the Venice Dell Community project on city-owned land in Councilmember Bonin's district. Sarah Letts served as HCHC's Executive Director throughout this period.²⁴

The Venice Dell project involved the same developer (HCHC), the same executive (Sarah Letts), and the same development model (affordable housing on public land) now before Santa Monica. As Bonin's Chief Communications Officer, Respondent would have had extensive professional contact with HCHC leadership in connection with this high-profile project.

This prior professional relationship explains Respondent's "intimate knowledge" of HCHC referenced in public testimony and creates an additional layer of conflict beyond his current employment with the Housing Action Coalition.

B. Pattern of Ethical Misconduct – The Bonin Recall Doxing Incident

In 2021, while serving as Bonin's Chief Communications Officer, Respondent was implicated in posting the home addresses of Bonin recall organizers on social media. The homes were subsequently vandalized, and the LAPD opened an investigation.²⁵

Recall organizer Nico Ruderman, currently a California State Senate candidate, stated: "Jesse Zwick's latest scandal is troubling but not surprising... [It] reflects a pattern entirely consistent with his character, one that lacks morals, ethics, integrity, and any real sense of remorse."

This prior conduct demonstrates a pattern of disregard for ethical boundaries directly relevant to evaluating Respondent's credibility and judgment in the instant matter.

²⁴Venice Dell Community Project, Hollywood Community Housing Corporation (HCHC) and Venice Community Housing (VCH) co-developers selected 2016. See hollywoodhousing.org/portfolio-item/venice-dell-community/

²⁵LA Times, September 20, 2021, reporting LAPD investigation of vandalism at homes of Bonin recall organizers after addresses were posted on social media.

VII. PUBLIC TESTIMONY – JANUARY 13, 2026

At the January 13, 2026 Santa Monica City Council meeting, multiple members of the public provided testimony regarding the December 17, 2024 HCHC vote and Respondent's conflicts.²⁶²⁷

A. "Intimate Knowledge" Testimony (Timestamp 26:01-26:25)

Public testimony established that Respondent possessed "intimate knowledge" of Hollywood Community Housing Corporation—knowledge extending beyond routine review of staff reports or public proceedings. This corroborates the documented ex parte communications and the pre-existing Venice Dell relationship.

B. Lobbying and Conflict Discussion (Timestamp 5:35:31-5:40:06)

Additional discussion addressed Respondent's conflict arising from his lobbying employment and the propriety of his participation in housing-related decisions—reflecting ongoing community concern regarding the integrity of the December 17, 2024 vote.

VIII. STATEMENT OF VIOLATIONS

A. FIRST CAUSE OF ACTION: Prohibited Ex Parte Communications

Statutory Basis: Government Code section 11430.10 et seq.

Government Code section 11430.10 prohibits ex parte communications between interested persons and decision-makers in quasi-judicial proceedings.²⁸ The December 17, 2024 HCHC vote was a quasi-judicial proceeding involving disposition of public land and approval of development agreements.

Respondent's documented private communications with Sarah Letts constitute prohibited ex parte communications:

1. Pre-selection meeting (February 2024) – accepting meeting invitation from applicant before Council selection;
2. "Misinformation" email (June 25, 2024) – sent from dais during public comment;
3. "Course of action" email (August 27, 2024) – same day as closed session on HCHC matter.

None of these communications were disclosed on the public record.

B. SECOND CAUSE OF ACTION: Conflict of Interest – Improper Participation

Statutory Basis: Government Code sections 87100, 87103; FPPC Regulations 18700, 18702.3, 18704

Government Code section 87100 prohibits public officials from participating in governmental decisions in which they have a financial interest.²⁹ Under the FPPC's nexus test, the financial effect is material if the decision will "achieve, defeat, aid, or hinder a purpose or goal" of the official's source of income.³⁰

²⁶Santa Monica City Council Meeting, January 13, 2026, Video Recording, YouTube (<https://www.youtube.com/watch?v=ALioPgiNyc4>), Timestamp 26:01-26:25 (public testimony regarding Zwick's "intimate knowledge" of HCHC).

²⁷Santa Monica City Council Meeting, January 13, 2026, Video Recording, Timestamp 5:35:31-5:40:06 (public comment on Zwick's relationship to HCHC and lobbying activities).

²⁸Gov. Code § 11430.10 et seq. (Administrative Procedure Act – Ex Parte Communications in adjudicative proceedings).

²⁹Gov. Code § 87100 ("No public official... shall make, participate in making or in any way attempt to use his official position to influence a governmental decision in which he knows or has reason to know he has a financial interest.").

³⁰FPPC Reg. 18702.3(b) (nexus test – financial effect is material if decision will achieve, defeat, aid, or hinder a purpose or goal of the source of income).

This Commission has already determined that Respondent's employment with the Housing Action Coalition creates a disqualifying conflict on housing production decisions.³¹ Respondent's participation in the December 17, 2024 HCHC vote—including **seconding the motion**—violated this prohibition.³²

C. THIRD CAUSE OF ACTION: Failure to Disclose and Recuse

Statutory Basis: Government Code section 87105; FPPC Regulation 18707

Government Code section 87105 requires that when a conflict exists, the official must publicly identify the financial interest and recuse from participation.³³ Respondent made no disclosure on the record regarding:

4. His employment negotiations with the Housing Action Coalition;
5. His pre-selection meeting with HCHC Executive Director Sarah Letts;
6. His ongoing ex parte communications with Letts during proceedings;
7. His prior professional relationship with HCHC through the Venice Dell Project;
8. Any basis requiring recusal from the decision.

IX. SIGNIFICANCE OF MOTION AND SECOND

The December 17, 2024 approval was moved by Councilmember Caroline Torosis and **seconded by Respondent Jesse Zwick**.³⁴

Under FPPC Regulation 18704, "participation" includes making or seconding motions.³⁵ By seconding the motion, Respondent engaged in one of the most significant forms of participation—formally endorsing and advancing the approval.

Under *Petrovich v. City of Sacramento*, participation by a single conflicted decision-maker is sufficient to invalidate a quasi-judicial action.³⁶ Here, **both the maker (Torosis) and seconder (Zwick) of the motion had conflicts**—compounding the due process concerns.

³¹FPPC Advice Letter A-25-153 (December 8, 2025), available at <https://www.fppc.ca.gov/content/dam/fppc/documents/advice-letters/2025/Final%20A-25-153.pdf>

³²FPPC Reg. 18704(a) (defining "participation" to include voting, making motions, and providing information for the purpose of affecting the decision).

³³Gov. Code § 87105(a) (requiring public identification of financial interest and recusal from participation).

³⁴Santa Monica City Council Meeting, December 17, 2024, Video Recording, Timestamp 5:50:24 (motion by Torosis, second by Zwick).

³⁵FPPC Reg. 18704(a) (defining "participation" to include voting, making motions, and providing information for the purpose of affecting the decision).

³⁶*Petrovich v. City of Sacramento* (2001) 91 Cal.App.4th 527, 538 (holding participation by single conflicted decision-maker sufficient to invalidate quasi-judicial action).

X. DOCUMENTARY EVIDENCE

The following documentary evidence is attached hereto and incorporated by reference:

Exhibit	Description
A	FPPC Advice Letter A-25-153 (December 8, 2025) (fppc.ca.gov/content/dam/fppc/documents/advice-letters/2025/Final%20A-25-153.pdf)
B	Deposition of Sarah Letts (July 7, 2025) – pp. 61-63
C	CPRA R031384 – Zwick/Letts Email (June 25, 2024)
D	CPRA R033709 – Zwick/Letts Email (August 27, 2024)
E	December 17, 2024 City Council Meeting Video (Timestamp 5:50:24) https://www.youtube.com/watch?v=ruqkt-efZPA
F	December 17, 2024 City Council Minutes and Staff Report https://santamonicacityca.igm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1421&MediaPosition=&ID=6695&CssClass=
G	January 13, 2026 City Council Video (Timestamps 26:01-26:25; 5:35:31-5:40:06) https://www.youtube.com/watch?v=ALioPgiNyc4
H	Venice Dell Community Project – HCHC/VCH Co-Developer (2016) https://hollywoodhousing.org/portfolio-item/venice-dell-community/
I	Westside Current Article (December 2, 2025) https://www.westsidecurrent.com/santa_monica/former-bonin-advisor-challenged-over-potential-conflicts-on-santa-monica-council/article_0129454b-0f6c-4a0e-81d4-595f8c626fb5.html)
J	SM Mirror Article (January 11, 2026) (https://smmirror.com/2026/01/santa-monica-residents-allege-council-conflicts-in-affordable-housing-vote/)
K	SM Mirror Article (January 14, 2026) (https://smmirror.com/2026/01/santa-monica-locals-demand-answers-over-ethics-allegations-in-housing-deal-video/)
L	LA Times Article (September 20, 2021) – LAPD Doxing Investigation https://www.latimes.com/california/story/2021-09-20/lapd-investigating-vandalism-reported-at-home-of-mike-bonin-recall-proponent)

Note: Yellow highlighting indicates critical new evidence (Letts deposition).

Exhibit B

19 Can you compare your email to
20 Mr. De -- Councilmember De la Torre on C5 with your email
21 to Councilmember Zwick on C1. They're both dated
22 February 7th.

23 A That's true.

24 Q And do you note that they're -- that they're
25 timed within five minutes of each other -- well, six

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855.348.4997

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SARAH LETTS

July 07, 2025

1 minutes?

2 A Yes.

3 Q Did you send similar emails to the other
4 councilmembers?

5 A I did.

6 Q What was your intention in sending the
7 February 7th emails to the councilmembers?

8 A To -- to engage in a conversation, to hear
9 their feedback, to answer any questions that they had.

10 Q Just to be clear that -- those emails sent to
11 the other -- and I'm going to ask, all councilmembers, is
12 that your recollection?

13 A Seven councilmembers.

14 Q Okay. And those emails were sent and the
15 invitation was made by you prior to the -- the Council
16 deciding who the developer was going to be of the
17 project?

18 A That's correct.

19 Q Did anyone ever tell you that that may have had
20 Brown Act ramifications?

21 MS. PASTER: Objection; calls for a legal

21 Q The email below that is also between you and
22 Jesse Zwick, do you see that, dated February 7th?

23 A Yes.

24 Q And you're introducing yourself to
25 Councilmember Zwick to talk about your project; is that

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SARAH LETTS

July 07, 2025

1 right?

2 A Yes.

3 Q Let's look at C3.

4 Do you see that?

5 A We accepted, yes.

6 Q Do you know what "Accepted: Santa Monica
7 Wilshire Sites" means?

8 A I think I sent him a meeting invite, and he
9 accepted the meeting invite.

Exhibit C

From: [Sarah Letts](#)
To: [Jesse Zwick](#)
Subject: Re: Wilshire Sites - proposed affordable housing
Date: Tuesday, June 25, 2024 7:41:12 PM
Attachments: [image001.png](#)

EXTERNAL

Hello Jesse,
Thank you for letting me know. I'm busy tonight and plan to listen to the public comment tomorrow.
All my best,
Sarah

On Jun 25, 2024, at 6:26 PM, Jesse Zwick <Jesse.Zwick@santamonica.gov> wrote:

Hi Sarah,

I'm writing from council, where 30 mid-city neighbors are angrily denouncing the project and possessed with a lot of misinformation.

Hopefully some of it can be cleared up at these meetings... but fair warning I imagine they will be hot.

From: Sarah Letts <sletts@hollywoodhousing.org>
Date: Tuesday, June 25, 2024 at 3:55 PM
To: Jesse Zwick <Jesse.Zwick@santamonica.gov>
Subject: Wilshire Sites - proposed affordable housing

EXTERNAL

Hello Councilmember Zwick,
I hope you are doing well. I'm reaching out to make sure you've heard that Hollywood Community Housing will host two more community meetings to discuss the proposed affordable housing on the city-owned parking lots near Wilshire. Attached is the flyer for the community meetings on Monday, July 8th (in-person at St. Anne's) and Wednesday, July 10th (Zoom). If you want to share information with your constituents, we are asking people to register for the community meetings via the project website so we can estimate the number of attendees. <https://hchcsantamonica.org/community-meetings/>
Please let me know if you have questions or would like to schedule a time to talk.

Exhibit D

From: [Sarah Letts](#)
To: [Jesse Zwick](#)
Subject: Re: Agenda Items 16-J - comment submitted by HCHC
Date: Tuesday, August 27, 2024 8:00:20 PM
Attachments: [image001.png](#)

EXTERNAL

Good question and thank you for asking. We are now fully behind this alternate proposal. Our Gramercy Place Apartments in mid-City LA is 64 units for people 55 and older and half of the units are PSH for seniors aged 55+. Gramercy is serving the residents and the neighborhood really well, and we think our alternate proposal for Santa Monica will also be an excellent project.

On Aug 27, 2024, at 6:55 PM, Jesse Zwick <Jesse.Zwick@santamonica.gov> wrote:

Hi Sarah,

Is this the course of action you want to pursue, or would you prefer to stick to the original proposal?

Jesse

From: Douglas Sloan <Douglas.Sloan@santamonica.gov>
Date: Tuesday, August 27, 2024 at 6:46 PM
To: Jesse Zwick <Jesse.Zwick@santamonica.gov>
Subject: Fwd: Agenda Items 16-J - comment submitted by HCHC

Doug Sloan
City Attorney

CONFIDENTIAL ATTORNEY CLIENT PRIVILEGED

From: David White <David.White@santamonica.gov>
Sent: Tuesday, August 27, 2024 3:31:16 PM
To: Heather Averick <Heather.Averick@santamonica.gov>; David Martin <David.Martin@santamonica.gov>; Douglas Sloan <Douglas.Sloan@santamonica.gov>
Subject: FW: Agenda Items 16-J - comment submitted by HCHC

XI. REQUESTED RELIEF

Complainants respectfully request that the Commission:

1. Accept this sworn complaint and open a formal investigation;
2. Issue findings regarding whether Respondent violated the Political Reform Act and ex parte communication prohibitions;
3. Impose maximum administrative penalties pursuant to Government Code section 83116;
4. Determine that the December 17, 2024 vote was legally compromised by Respondent's conflicted participation;
5. Issue guidance that a simple "revote" does not cure participation at the motion stage, because Respondent's seconding shaped the decision before any ratification;
6. Refer this matter to the California Attorney General for civil enforcement action, including potential invalidation of the Development Agreement pursuant to Government Code section 91001;
7. Advise the City of Santa Monica that the December 17, 2024 approval is legally defective and should be rescinded;
8. **Refer this matter to the United States Attorney for the Central District of California** for investigation of potential federal offenses, including:
 - (a) Honest Services Fraud under 18 U.S.C. § 1346, arising from Respondent's deprivation of the public's right to his honest services as an elected official;
 - (b) Federal Program Fraud under 18 U.S.C. § 666, given that the Development Agreement involves organizations receiving federal funds exceeding \$10,000 annually and commits \$13.5 million in public Housing Trust Fund monies.

XII. RELATED COMPLAINT

Complainants are simultaneously filing a separate sworn complaint regarding Councilmember Caroline Torosis's participation in the same December 17, 2024 vote. Councilmember Torosis made the motion that Respondent seconded. Torosis is employed by LA County Supervisor Holly Mitchell's office, which HCHC lists as its "Government Partner." Los Angeles County has confirmed that communications between Torosis and HCHC are "voluminous."

The Commission should consider these complaints together in assessing the integrity of the December 17, 2024 decision.

IX. DECLARATION UNDER PENALTY OF PERJURY

We, the undersigned, declare under penalty of perjury under the laws of the State of California that:

1. We have personal knowledge of the facts stated herein or have reviewed documentary evidence supporting the allegations;
2. We are authorized to file this complaint on behalf of our respective organizations;
3. The foregoing is true and correct to the best of our knowledge and belief.

Executed on January 26 , 2026, at Santa Monica, California.

MID-WILSHIRE NEIGHBORS

Trevor Nichols

Jay Johnson

Esther Chun

Emily Gutierrez

Giacomo Valentini

Clara Seneca

Contact Information for Service:

Mid-Wilshire Neighbors

Email: smdemandsafetyfirst@gmail.com