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July 23, 2015

Hon. Glenda Sanders, Presiding Judge
Orange County Superior Court
700 Civic Center Drive West
Santa Ana, CA 92701

Re: Grand Jury Report re West Cities Communication Center Joint Powers Authority

Dear Judge Sanders:

The undersigned serves as Counsel to the West Cities Communication Center Joint Powers Authority (West-Comm). In that capacity, I have been asked to respond to the 2014-2015 Grand Jury Report.

The Grand Jury Report is mistaken as it relates to West-Comm. West-Comm is comprised of the independent cities of Seal Beach, Cypress and Los Alamitos, and provides police dispatch services to those cities, as well as to the County of Orange's Park Rangers. Thus, it is clearly not controlled by a single entity. It's Board of Directors is made up of a City Council member from each of its three cities. It does not contain any Redevelopment Agencies as members. Therefore, West-Comm is not a vertical JPA in any respect, and should not be subject to any of the disclosure requirements applicable to vertical JPAs.

On page 3 of the Report, the Grand Jury notes that it has four concerns:

1) The viability of JPAs with Redevelopment Agencies as members:

West-Comm does not have any RDA's as members.

2) The use of JPAs by Government organizations to be controlled by a single government entity.

West-Comm is not controlled by a single government entity. Rather it is controlled by three independent cities.

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3) The lack of true disclosure and transparency of the organization and financial information to taxpayers:

West-Comm is completely transparent. Its meetings are public, and its finances are public records. The JPA posts its audits on its website. The 2014 audit (through June 30, 2014) is there, and the 2015 will be up once it is completed.

4) The extreme debt to revenue ratio of some JPAs which brings into question their solvency:

West-Comm's debt to revenue ratio is 10.5%. West-Comm has minimal debt of approximately \$242,000 related to accrued employee leave and retirees' health benefits. West-Comm has no other liabilities aside from recurring monthly accounts payable. See <http://www.west-comm.org/transparency-in-government/> for links to its financial reports and other public records. West-Comm and its three member cities are financially quite sound.

In addition, West-Comm complies with the letter and spirit of the law. Finding 6 (F6) of the Report, which stated that West-Comm did not comply with California State Reporting Requirements, is also incorrect. The following reports were submitted by West-Comm to the SCO:

1. A Special District Financial Transaction Report for the fiscal year ended June 30, 2013
2. U.S. Bureau of Census Form
3. Government Compensation in California (GCC) Report for Calendar Year 2012
4. Audited financial statements for West-Comm for the fiscal year ended June 30, 2013.

In summary, it appears that the Grand Jury investigation has been erroneously directed against West-Comm. We believe that we are in compliance with the letter and the spirit of all laws applicable to us, and we will endeavor to continue to comply. Please let me know if the Grand Jury disagrees with my above analysis, and if so, in what manner.

Thank you for your anticipated cooperation.

Very truly yours,



CARY S. REISMAN