

**BRIAN KRAMER**  
Santa Ynez, California 93460

October 4, 2017

**SENT VIA FACSIMILE & EMAIL**

Supervisor Steve Lavagnino  
Santa Barbara County Board of Supervisors  
105 E. Anapamu Street  
Santa Barbara, California 93101  
Facsimile No. (805) 346-8404

Supervisor Das Williams  
Santa Barbara County Board of Supervisors  
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Supervisor Joan Hartmann  
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Supervisor Peter Adam  
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Supervisor Janet Wolf  
Santa Barbara County Board of Supervisors  
105 E. Anapamu Street  
Santa Barbara, California 93101  
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**Re: Intergovernmental Memorandum of Agreement - Camp 4  
Political Contributions by the Tribe to Supervisor Steve Lavagnino  
Conflict of Interest Involving Supervisor Steve Lavagnino  
Public Hearings - - October 5, 2017 & October 17, 2017**

Dear Supervisors Lavagnino, Williams, Hartmann, Adam and Wolf:

I live in Santa Ynez, California. I understand there are upcoming Public Meetings and a hearing to address the tentative "Intergovernmental Memorandum of Agreement - Camp 4" between Santa Barbara County and the Santa Ynez Band of Chumash Indians ("Tribe") to allow the development of Camp 4 which includes 143 homes, tribal facilities, water treatment facilities, roads and infrastructure, among other things.

Please post this letter on the County's website in connection with the Public Meeting on October 5, 2017, and the hearing for October 17, 2017.

I previously wrote to each of you on September 28, 2017, and requested **each** member of the Board of Supervisors, as a candidate or incumbent, disclose all amounts, if any, received as political contributions from the Tribe, Tribal members, any tribe operating a gambling casino, and any tribal organization. I requested the information be posted on the County's website so there would be complete transparency and public confidence and faith in the political process.

No member of the Board of Supervisors posted their political contributions from the Tribe.

You can appreciate the importance of political contributions from the Tribe as it appears the Ad Hoc Subcommittee Regarding Santa Ynez Valley Band of Chumash Indian Matters has negotiated a "tentative" Agreement in secret with the Tribe, and denied the public a fair opportunity to comment on the terms of an Agreement that does not benefit the community.

In previous letters, I disclosed the substantial financial payments Supervisor Das Williams received from the Santa Ynez Band of Mission Indians and other tribes which creates a disqualifying conflict of interest for Supervisor Williams to participate in negotiations and vote on any Agreement that involves Supervisor Williams' **largest** financial contributor (the Tribe).

Although Supervisor Steve Lavagnino has not responded to requests that he disclose the Tribe's financial contributions to him, it appears Supervisor Lavagnino has received regular political contribution from the Tribe in 2010, 2011, 2012, 2013, 2014, 2015, 2016 and 2017. The fact that Supervisor Laganino received substantial political contributions from the Tribe during pending litigation involving Camp 4 is appalling and inexcusable.

**TRIBE'S CONTRIBUTIONS TO SUPERVISOR LAVAGNINO:**

Set forth below are financial contributions Supervisor Lavagnino apparently received from the Santa Ynez Band of Mission Indians (Tribe):

February 24, 2010	\$ 1,000.00
March 14, 2010	\$ 2,000.00
January 26, 2011	\$ 500.00
January 9, 2012	\$ 1,500.00
January 9, 2013	\$ 1,500.00
January 29, 2013	\$ 1,000.00
January 21, 2014	\$ 5,000.00
January 23, 2015	\$ 2,500.00
January 20, 2016	\$ 5,000.00
January 25, 2017	\$ 2,500.00

**TOTAL      \$22,500.00**

Supervisor Lavagnino holds a position of trust and a fiduciary duty to the residents of Santa Barbara County. The above contributions to Supervisor Lavagnino create a serious conflict of interest and Supervisor Lavagnino should **not** be allowed to vote on any "tentative" Agreement entered into with Tribe as the Tribe is one of the **largest** political contributors to Supervisor Lavagnino. It is not clear to whom Supervisor Lavagnino owes his loyalty in light of his receipt of at least \$22,500.00 from the Tribe.

**It is requested that Supervisor Steve Lavagnino immediately recuse and disqualify himself from any further action or proceedings regarding the Ad Hoc Subcommittee and the tentative "Intergovernmental Memorandum of Agreement - Camp 4." Moreover, Supervisor Lavagnino must recuse himself from voting on the "tentative" Agreement as he has a blatant conflict of interest.**

There is an obvious conflict of interest when a member of the Board of Supervisors has received at least \$22,500.00 from the opposing side to a "tentative" Agreement. Again, the loyalty of Supervisor Lavagnino is in dispute.

It is further requested that an investigation be initiated immediately to determine what political influence was involved in the negotiation process of a "tentative" agreement that does **not** protect the environment or rural character to the Santa Ynez Valley and is contrary to everything Santa Barbara County has repeatedly stated in its filings with the federal government and in federal court, not to mention the County's failure to allow adequate time for the community to review and comment on the "tentative" Agreement for the County's consideration.

The \$22,500.00 in political contributions received by Supervisor Lavagnino from the Tribe must be added to the Agenda for upcoming Public Meetings and the hearing set for October 17, 2017.

A further request is made that each Supervisor disclose each and every political donation they received from the Tribe, Tribal members, any tribe operating a gambling casino, and any tribal organization.

**Please post this letter on the County's website for upcoming meetings and hearings.**

If you have any questions concerning this matter, please do not hesitate to contact me at [BrianKramerLaw@aol.com](mailto:BrianKramerLaw@aol.com) or my office at 1230 Rosecrans Avenue, Suite 300, Manhattan Beach, California 90266, Tel. (310) 536-9501.

Very truly yours,  
*Brian Kramer*  
Brian Kramer

cc:

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