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6	Attorney for Petitioner and Plaintiff Yes on 21, Homeowners and Tenants United to Ke Sponsored by AIDS Healthcare Foundation	eep Families in Their Homes,
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8	SUPERIOR COU	RT OF CALIFORNIA
9	COUNTY OF	F LOS ANGELES
10		
11	YES ON 21, HOMEOWNERS AND TENANTS UNITED TO KEEP FAMILIES IN THEIR	Case No.:
12	HOMES, SPONSORED BY AIDS HEALTHCARE FOUNDATION, a California	COMPLAINT FOR INJUNCTIVE AND
13	political committee;	DECLARATORY RELIEF
14	Plaintiff, v.	(Govt. Code, § 91003; Code Civ. Proc., §§ 525, 1060)
15		1000)
16	NO ON PROP 21 - CALIFORNIANS TO PROTECT AFFORDABLE HOUSING - A	
17	COALITION OF HOUSING ADVOCATES, RENTERS, BUSINESSES, TAXPAYERS,	
18	AND VETERANS, a California political committee; NO ON PROP 21: CALIFORNIANS	
19	FOR RESPONSIBLE HOUSING, A COALITION OF SENIORS, VETERANS,	
20	AFFORDABLE HOUSING ADVOCATES, LABOR & SOCIAL JUSTICE	
21	ORGANIZATIONS, SPONSORED BY CALIFORNIA APARTMENT ASSOCIATION,	
22	a California political committee; CALIFORNIA BUSINESS ROUNDTABLE ISSUES PAC, a	
23	California political committee;	
	Defendants.	
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28		
		RECYCLED PAPER
	COMPLAINT FOR INJUNCTI	VE AND DECLARATORY RELIEF

INTRODUCTION

1. The State of California has enacted a comprehensive statutory and regulatory scheme aimed at ensuring that citizens of this state have information regarding the source of campaign 4 contributions to state electoral campaigns. These laws are particularly important in the area of ballot measure advocacy, where campaign finance limits do not apply, and the electorate is inundated with 6 campaign materials advocating different perspectives on many important ballot measures. The Legislature has imposed specific requirements on the political committees that fund these advertisements to disclose their major contributors on written, digital, and audio communication to the public.

2 In addition, the Legislature has long required that the true source of funding be disclosed to the public. Donors of more than \$100 to political committees must donate in their true names, and all donations from single donor must be attributed to that donor. Donors may not hide behind anonymity or innocuous sounding corporate names to shield their participation in political activity.

3. This lawsuit seeks to compel Defendants, political committees who oppose Proposition 21, a statewide ballot measure, to follow the state's laws that govern disclosure of political contributions and the disclaimers placed on political advertising. In bringing this action, Plaintiff stands in the shoes of the public, which is being wrongly deprived of accurate information regarding the donors to these committees and the business and economic interests of those donors.

4 This suit is brought without expectation of pecuniary gain: Plaintiff seeks only to enforce the laws that so that the public is aware of the true source of money behind the opposition to Proposition 21, exactly as the Legislature intended in enacting and amending the Political Reform Act.

5. Petitioner also seeks a preliminary injunction to prevent these activities from continuing during the remainder of the 2020 election cycle.

PARTIES

6. Plaintiff YES ON 21, HOMEOWNERS AND TENANTS UNITED TO KEEP FAMILIES IN THEIR HOMES, SPONSORED BY AIDS HEALTHCARE FOUNDATION ("Plaintiff") is a California political committee primarily formed to support Proposition 21.

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7. Defendant NO ON PROP 21 - CALIFORNIANS TO PROTECT AFFORDABLE
 HOUSING - A COALITION OF HOUSING ADVOCATES, RENTERS, BUSINESSES,
 TAXPAYERS, AND VETERANS ("CPAH") is a California political committee primarily formed to
 oppose Proposition 21.

8. Defendant NO ON PROP 21: CALIFORNIANS FOR RESPONSIBLE HOUSING, A
COALITION OF SENIORS, VETERANS, AFFORDABLE HOUSING ADVOCATES, LABOR &
SOCIAL JUSTICE ORGANIZATIONS, SPONSORED BY CALIFORNIA APARTMENT
ASSOCIATION ("CFRH") is a California political committee primarily formed to oppose Proposition 21.

9. Defendant CALIFORNIA BUSINESS ROUNDTABLE ISSUES PAC ("CBR") is a
 California political committee. CBR is classified as a "general purpose" committee by the California
 Secretary of State.

10. Defendants Does 1 through 100 are or were the agents, employees, contractors, and/or entities acting under the authority of each other respondent or real party in interest, and each performed acts on which this action is based within the cause and scope of such agency and/or employment.
Plaintiff does not know the true names and capacities, whether individual, corporate, or otherwise, of Does 1 through 100, inclusive, and therefore sue said respondents and defendants under fictitious names. Plaintiff will amend its Complaint to show their true names and capacities when they have been ascertained.

VENUE

11. This Court has original jurisdiction over this matter pursuant to article VI, section 10 of the California Constitution, and section 410.10 of the Code of Civil Procedure.

12. Venue is proper in the County of Los Angeles pursuant to Code of Civil Procedure section 395 in that defendants or some of them reside in the County.

STATEMENT OF FACTS

13. In the campaign for the November 2020 election, Plaintiff Yes on 21 is a political committee primarily formed to support the passage of Proposition 21, a statewide ballot measure that

amends state law governing rent control to permit local governments to impose rent control on a wider range of properties than is currently permissible under state law.

14. Proposition 21 is strongly opposed by the real estate industry, particularly by real estate entities who own rental properties that could face additional rent control if Proposition 21 is approved by the voters and local governments choose to adopt new rent control ordinances.

15. Many of these same real estate entities were active in the 2018 election cycle opposing Proposition 10, which was a different statewide ballot initiative on the subject of rent control. As set forth *infra*, when compared to their behavior in the 2018 election cycle, the manner of contributing Proposition 21 opposition has been manipulated to conceal the substantial financial contributions that some of these corporate real estate entities have made in opposition to Proposition 21.

16.Defendant CPAH has raised roughly \$7.5 million to oppose Proposition 21.CFRH has raised over \$32 million to oppose Proposition 21.

17. The Political Reform Act (Govt. Code, § 81000 *et seq.*) was first enacted by the voters as a statewide ballot measure in 1974, and has since been amended on multiple occasions by ballot measure and by the Legislature.

18. The Political Reform Act was enacted to address a number of concerns in the political and campaign process, including most particularly the influence of large campaign contributions on the outcome of elections. The Act's findings include, *inter alia*, that "[t]he influence of large campaign contributors is increased because existing laws for disclosure of campaign receipts and expenditures have proved to be inadequate;" that "[t]he wealthy individuals and organizations which make large campaign contributions frequently extend their influence by employing lobbyists and spending large amounts to influence legislative and administrative actions;" and that "[t]he influence of large campaign contributors in ballot measure elections is increased because the ballot pamphlet mailed to the voters by the state is difficult to read and almost impossible for a layman to understand." (Govt. Code, § 81001.)

19. Among the main purposes of the Act is that "[r]eceipts and expenditures in election
campaigns should be fully and truthfully disclosed in order that the voters may be fully informed and
improper practices may be inhibited." (Govt. Code, § 81002, subd. (a).)

3 (Govt. Code, § 81002, subd. (f).) 4 21 The Political Reform Act must be "liberally construed to accomplish its purposes." 5 (Govt. Code, § 81003.) 22. Pursuant to Government Code section 91003, "[a]ny person residing in the jurisdiction 6 7 may sue for injunctive relief to enjoin violations or to compel compliance with the provisions of this 8 title." 9 23. On September 18, 2020, Plaintiff filed a sworn complaint with the Fair Political Practices 10 Commission containing the illegal practices and violations identified herein, requesting an investigation 11 of the matter. 24. 12 Plaintiff is informed, and on that basis alleges that the Fair Political Practices 13 Commission will not issue an order to cease the illegal practices set forth in this Complaint in a manner 14 that will effectively address the issues during the 2020 election cycle. 15 FIRST CAUSE OF ACTION (Violation of Political Reform Act by Defendants CPAH and CBR, Injunctive and 16 **Declaratory Relief**) (Govt. Code, § 91003; Code Civ. Proc. §§ 525, 1060.) 17 25. Plaintiff hereby re-alleges and incorporates herein by reference the allegations in the 18 preceding paragraphs. 19 26. Defendant CPAH and its top contributor, Defendant CBR, have collaborated to shield the 20 true source of CPAH's funding from the public. 21 27 The Business Roundtable PAC, as a recipient committee, receives contributions from 22 donors. It received a total \$7,000,000 in contributions in June 2020 from entities related to Blackstone 23 Property Partners, L.P., ("Blackstone") a well-known real estate investment entity. This PAC has also 24 received \$4,305,000 in contributions from Michael K. Hayde ("Hayde"), CEO and chairman of Western 25 National Group, which manages apartment communities throughout California, and \$2,000,000 in 26 contributions from Geoffrey Palmer ("Palmer"), a Los Angeles real estate developer of rental 27 apartments. 28 5 COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

In addition, the Act calls for the "[a]dequate enforcement mechanisms should be

provided to public officials and private citizens in order that this title will be vigorously enforced."

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28. These contributions are significantly higher than the contributions this same committee received during the election cycles of 2018 (when Proposition 10, also related to rent control, was on the ballot) and 2016. The sum total of contributions received in the entire year for 2018 was \$1,210,500.

29. The Business Roundtable PAC has not kept these funds for itself. Rather, it has been making large contributions to two committees primarily formed to oppose statewide ballot measures: Proposition 15, and Proposition 21. In both cases, the contributions have made the California Business Roundtable the top contributor by far to these committees. (See Fig. 1 and Fig. 2.)

Opposing

ngular SngNo on Prop 15 - Stop Higher Property Taxes and Save Prop 13 - a coalition of California homeowners, taxpayers, and businesses

	Contributor	State	Status	Total Contributions
1	California Businesses Roundtable Issues PAC Top Donors to Contributor	CA	-	\$13,367,690
2	California Business Properties Association Issues PAC	CA	↑ +	\$1,101,000
3	California Taxpayers Association - Protect Taxpayer Rights	CA	\downarrow	\$1,040,000
4	AMERCO	NV	-	\$596,000
5	Boston Properties	CA	-	\$500,000
6	PG Op Partnership, LP c/o Paramount Group, Inc.	NY	-	\$500,000
7	NextEra Energy, Inc.	CA	-	\$495,000
8	Columbia Property Trust	CA	NEW	\$400,000
9	Jeffrey M. Worthe Including Aggregated Contributions	CA	-	\$375,000
10	Karney Management Company	CA	NEW	\$250,000
	Total from top contributors			\$18, <mark>624,69</mark> 0

Fig. 1 Top 10 Contributors to No on Prop 15, as of September 25, 2020

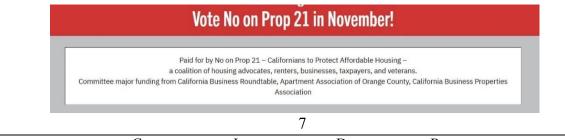
Opposing

	taxpayers, and veterans			
	Contributor	State	Status	Total Contributions
1	California Business Roundtable Issues PAC Top Contributors	CA	-	\$5,600,000
2	Multi-County Property Rights PAC, Sponsored By Apartment Assn of Orange County Top Contributors	CA	-	\$391,000
3	California Business Properties Association Issues PAC Top Contributors	CA	-	\$275,000
4	Issues PAC of Apartment Association of Greater Los Angeles	CA	-	\$175,000
5	No on 21 - Californians for Affordable Housing, sponsored by the California Rental Housing Association	CA	-	\$162,010
6	Southern California Rental Housing Association PAC	CA	-	\$50,000
7	Steven L. Eggert	CA	-	\$50,000
8	Sam Sorokin and Affiliates	CA	-	\$44,800
9	Casa La Veta Associates dba Brookside I Apartments	CA	-	\$26,400
0	Waterstone Park	CA	+	\$25,000

Fig. 2 Top 10 Contributors to CPAH as of September 25, 2020

30. The Political Reform Act requires the disclosure of the top three contributors to the committee paying for the measure in all disclaimers used in television, radio, internet, and printed advertisements. (Govt. Code, §§ 84503, 84504, 84504.1, 84504.2, 84504.3.)

31. CPAH lists the Business Roundtable as a top contributor and includes that PAC on its disclaimer. But the public cannot easily see who it is that is funding the Business Roundtable – the information will not be included on the numerous mailers, television ads, and newspaper advertising that is required to bear CPAH's disclaimer.



COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

32. Because the individual donors to the Business Roundtable have contributed in amounts that far exceed the contributions of the second highest contributor, the omission of this information is highly misleading. Moreover, the amount of money contributed by the Business Roundtable to CPAH and the opposition to Prop 15 suggests a coordinated effort between these entities.

33. The Political Reform Act prohibits earmarking of contributions. "A person shall not make any contribution to a committee. . . that is earmarked for a contribution to any other particular committee ballot measure . . . unless the contribution is fully disclosed." (Govt. Code, § 85704, subd. (a).) When an earmarked contribution is provided from one committee to another, it must provide all information regarding the donor of the earmarked funds. (*Id.*, subd. (d).)

34. In 2018, when Proposition 10 was on the ballot, Blackstone, Hayde, and Palmer
collectively contributed close to \$12 million to one committee primarily formed to oppose Proposition
10. Blackstone and Hayde were both listed as major funders on that committee's advertising
disclaimers.

35. Because Blackstone and Hayde made their contributions to Defendant CBR, rather than to Defendant CPAH, they are not listed as major funders of Defendant CPAH on its disclaimer.

36. These significant donors appear likely to have earmarked their contributions to Defendant CBR for contribution to Defendant CPAH and to the Proposition 15 opposition.

37. Defendant CBR, by failing to disclose the earmarking of these contributions, has violated the Political Reform Act's earmarking provisions.

38. Defendant CPAH, by failing to properly disclose its largest donors through the proper reporting of earmarked contributions, has violated the Political Reform Act's reporting and disclaimer provisions.

39. Defendants' actions in receiving, contributing, and reporting these contributions, and in
publicizing Defendant CPAH's inaccurate disclaimer, have caused and threaten to cause Plaintiff and
the public irreparable and substantial harm, by failing to disclose the true source of funds for the
opposition to Proposition 21.

40. Plaintiff has no plain, speedy, and adequate remedy at law, in that unless this Court
enjoins the Defendants, they will continue to contribute earmarked contributions and place

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advertisements bearing inaccurate disclaimers. No amount of monetary damages or other legal remedy can adequately compensate Plaintiff for the irreparable harm that Plaintiff, and the voters of the State of California will suffer from the violations of law described herein.

41. A dispute has arisen between Plaintiff and Defendants, in that Plaintiff believes and contends, for the reasons set forth above, that Defendants' actions as set forth above were unlawful and invalid. Plaintiff is informed and believes, and on that basis contends, that Defendants contend in all respects to the contrary.

42. Plaintiff contends that Defendant CBR has violated the Political Reform Act by failing to properly disclose earmarked contributions. Plaintiff contends that Defendant CPAH has violated the Political Reform Act by failing to properly report the receipt of earmarked contributions and by failing to properly list its top contributors in its advertising disclaimers. Plaintiff is informed and believes that Defendants have disagreed with Plaintiff's contentions.

43. A judicial declaration as to the legality of Defendants' actions, as set forth above, is therefore necessary and appropriate to determine the respective rights and duties of the parties.

SECOND CAUSE OF ACTION

(Violation of Political Reform Act by Defendant CFRH, Injunctive and Declaratory Relief) (Govt. Code, § 91003; Code Civ. Proc. §§ 525, 1060.)

44. Plaintiff hereby re-alleges and incorporates herein by reference the allegations in the preceding paragraphs.

45. Defendant CFRH has committed violations of the Political Reform Act that serve to conceal the true identity of its donors.

46. The Political Reform Act requires the aggregation of contribution by entities under a variety of circumstances, including when an individual directs or controls an entity's contributions and when two or more entities make contributions that are directed or controlled by a majority of the same persons. All contributions made by entities that are majority owned by a person must be aggregated with the contributions of the majority owner and all other entities majority owned by that person, unless the entities act independently in their contribution making. (See Govt. Code, § 82015.5)

47. The Political Reform Act provides that an "entity' means any person other than an individual, and 'majority owned' means ownership of more than 50 percent." (Govt. Code, § 82015.5,

subd. (a).) Accordingly, "[i]f an individual directs or controls an entity's contributions, the entity's contributions shall be aggregated with contributions made by both of the following: (1) That individual. (2) Any other entity whose contributions that individual directs or controls." (*Id.*, subd. (b).) Moreover, "[i]f two or more entities make contributions that are directed or controlled by a majority of the same persons, the contributions of those entities shall be aggregated." (*Id.*, subd. (c).) The law requires that "[c]ontributions made by entities that are majority owned by a person shall be aggregated with the contributions of the majority owner and all other entities majority owned by that person, unless those entities act independently in their contribution-making decisions." (*Id.*, subd. (d).)

48. Defendant CFRH has failed to aggregate contributions even when the contributions were provided under circumstances that reasonably should have indicated to Defendant CFRH that the contributions were made by related entities. Under the regulations of the Fair Political Practices Commission, a committee' treasurer must "[c]orrect inaccuracies or omissions in campaign statements of which the treasurer knows, and cause to be checked, and if necessary, corrected, information in campaign statements a person of reasonable prudence would question based on all the surrounding circumstances of which the treasurer is aware or should be aware by reason of his or her duties under this regulation and the Act." (California Code of Regs., Tit. 2, Div. 6, § 18427(a)(5).)

49. Plaintiff reviewed and analyzed contribution data provided by the California Secretary of State based upon Defendant CFRH's reporting of contributions received. Based upon this data, Plaintiff identified a number of contributions that were provided to Defendant CFRH under circumstances that should have flagged these contributions as being made in a manner designed to obscure their origins.

50. For instance, on August 17, 2020, 22 separate contributions were made by LLCs located in the same zip code in San Diego. A search on the California Secretary of State's Business entities database revealed that the vast majority of the entities list F and F Income Properties as either the general partner or managing entity, and that either Dan Feder or Megan Danbach is the manager. All of the companies are registered at one of the same three mailing addresses. The aggregate total of these contribution is \$52,900 – but the contributions were not aggregated on Defendant CFRH's campaign reports.

51. Similarly, on August 5, Defendant CFRH reported receiving 12 contributions from entities in Hayward, all controlled by the same manager, totaling \$60,950. These contributions were not aggregated in Defendant's CFRH's reports.

52. On June 26, Defendant CFRH reported receiving three contributions from entities in Boca Raton, Florida, all of which are registered in the State of California to the same Dallas, Texas address – the address associated with Maple Multiple Family, which does business as Trammell Crow. These June 26 contributions from Boca Raton entities totaled \$73,700.

53. **Exhibit 1** contains Plaintiff's summary of the data compiled from the Secretary of State's Cal Access system from political committee reporting data, and the data from the Secretary of State's Business Entities database. There are several other examples of contributions made by entities at the same addresses on the same date that a reasonably prudent person would conclude may have been made under circumstances in which these entities were not independently controlled in their decisions to make these contributions.

54. Defendant CFRH's failure to correctly identify the "true source" of these contributions have caused and threaten to cause Plaintiff and the public of the State of California irreparable and substantial harm, by failing to disclose the true source and scope of political contributions being made in opposition to Proposition 21.

55. Plaintiff has no plain, speedy, and adequate remedy at law, in that unless this Court enjoins Defendant, it will continue to fail to report the true source of contributions received under circumstances in which a person of reasonable prudence would question the source of the contribution. No amount of monetary damages or other legal remedy can adequately compensate Plaintiff for the irreparable harm that Plaintiff and the public at large will suffer from the violations of law described herein.

56. A dispute has arisen between Plaintiff and Defendant CFRH, in that Plaintiff believes
and contends, for the reasons set forth above, that Defendant CFRH's actions as set forth above were
unlawful and invalid. Plaintiff is informed and believes, and on that basis contends, that Defendant
CFRH contends in all respects to the contrary.

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57. Plaintiff contends that Defendant CFRH has failed to report the true source of its contributions by failing to properly report contributions made by corporate entities. Plaintiff is informed and believes that Defendant CFRH disagrees with Plaintiff's contentions.

58. A judicial declaration as to the legality of Defendant CFRH's actions, as set forth above, is therefore necessary and appropriate to determine the respective rights and duties of the parties.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief as follows:

1. As to the First Cause of Action, that this Court issue a temporary restraining order, preliminary injunction, and permanent injunction enjoining Defendants CPAH and CBR from violating the Political Reform Act's provisions regarding disclosure of true source of contributions, including but not limited to the provisions regarding the disclosure of earmarked contributions;

2. As to the First Cause of Action, that this Court issue declaratory relief that Defendants CPAH and CBR have violated the Political Reform Act by failing to properly disclose and report earmarked contributions, and by failing to include top contributors on advertising disclaimers;

3. As to the Second Cause of Action, that this Court issue a temporary restraining order, preliminary injunction, and permanent injunction enjoining Defendant CFRH from violating the Political Reform Act's provisions regarding disclosure of true source of contributions, including but not limited to the provisions regarding the aggregation of contributions made by related entities;

4. As to the Second Cause of Action, that this Court issue declaratory relief that Defendants CFRH has violated the Political Reform Act by failing to properly disclose and report the true source of contributions, including the aggregation of contributions by related entities;

5. That this Court award Plaintiff costs and attorneys' fees pursuant to Government Code section 91003, subdivision (a), Code of Civil Procedure section 1021.5, or other applicable law; and

6. That this Court grant Plaintiff such other, different, or further relief as the Court may deem just and proper.

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1	Dated: September 29, 2020	Respectfully submitted,
2		STRUMWASSER & WOOCHER LLP
3		Fredric D. Woocher Beverly Grossman Palmer
4		or of m
5		By: By & Jal
6		Beverly Grossman Palmer
7		<i>Attorneys for Plaintiff Yes on 21- Renters and Homeowners United to Keep Families in Their Homes</i>
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	COMPLAINT FOR INJUN	13 CTIVE AND DECLARATORY RELIEF

Exhibit 1

	Bill Brooks (CEO)	Sequoia Equities, Inc.	2476234-INC833	7/21/2020	6/29/2020	AMENDMENT #1	LATE CONTRIBUTION RECEIVED	\$6,960.00	CA / 94553 \$6,960.00	MARTINEZ	PLUM TREE APARTMENTS
	Bill Brooks (CEO)	Sequoia Equities, Inc.	2476234-INC834	7/21/2020	6/29/2020	AMENDMENT #1	LATE CONTRIBUTION RECEIVED	\$5,700.00	CA / 94553	MARTINEZ	REGENCY PLAZA APARTMENTS
3889 Maple Ave, Suite 200, Ave NW, Dallas, TX 75219 20004	Foreign Limited Partnership; Signed by Nadia Petrova, Assistant Secretary to General Partner	CRP/Maple Esplanade, ШС	2477775-INC768	7/11/2020	6/26/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$25,300.00	FL/33487 \$25,300.00	BOCA RATON	CRP/MAPLE ESPLANADE OWNER LLC
3889 Maple Ave, Suite 200, Dallas, TX 75219	Foreign Limited Partnership; Signed by Nadia Petrova, Assistant Secretary to General Partner	CCH 107 South Echo, LP	247775-INC771	7/11/2020	6/26/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$20,000.00	FL/33487 \$20,000.00	BOCA RATON	SOUTH ECHO APARTMENTS LLC BOCA RATON
3 3889 Maple Ave, Suite 200, Dallas, TX 75219	Amendment lists new partner as Maple Multi- Family Development, LLC (same address); Foreign Limited Partnership; Signed by Nadia Petrova, Assistant Secretary to General Partner	CCH 109 Mission Valley, LP	2477775-INC773	7/11/2020	6/26/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$28,400.00	FL/33487	BOCA RATON	FASHION VALLEY APARTMENTS LP
ADDRESS - REGISTRATION	MANAGER	GENERAL PARTNERS/MANAGING ENTITY	TRANS #	FILED DATE	TRANS. DATE FILED DATE	TYPE	TRANSACTION TYPE	AMOUNT	STATE/ZIP	CITY	NAME OF CONTRIBUTOR

			Not listed on SoS website, but a company search lists Joseph L. Felson and B Street address under contact information: https://us.lei.report/LEI/549300F5 QONE9B1LCR74	2488950-INC1130	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$4,150.00	CA/94541 \$4,150.00	HAYWARD	FELSON FAMILY 1996 PARTNERSHIP LP AND AFFILIATED ENTITIES
			Not listed on SoS website, but a company search lists Joseph L. Felson and B Street address under contact information: https://us.lei.report/LEI/549300F5 QONE9B1LCR74	2488950-INC1131	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$4,500.00	CA/94541 \$4,500.00	HAYWARD	FELSON FAMILY 1996 PARTNERSHIP LP AND AFFILIATED ENTITIES
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1132	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$7,500.00	CA / 94541 \$7,500.00	HAYWARD	PARK ORCHARD ASSOCIATES, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1133	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$9,400.00	CA / 94541	HAYWARD	WHITMAN GREEN, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1134	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$7,300.00	CA / 94541 \$7,300.00	HAYWARD	MISSION HEIGHTS ASSOCIATES, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1135	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$9,050.00	CA / 94541 \$9,050.00	HAYWARD	CRESTVIEW TERRACE, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1136	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$5,000.00	CA / 94541	HAYWARD	PINECREST ASSOCIATES, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	B Street Associates, LLC	2488950-INC1137	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$2,600.00	CA / 94541	HAYWARD	CREEKSIDE/FELSON ASSOCIATES, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	JRE Associates, LLC (formerly Third Street Associates, LLC)	2488950-INC1138	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$2,300.00	CA / 94541 \$2,300.00	HAYWARD	WOODLARK ASSOCIATES, LP
	1290 B Street, Suite 210, Hayward, CA 94541	Joseph L. Felson	JRE Associates, LLC (formerly Third Street Associates, LLC)	2488950-INC1141	8/6/2020	8/5/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$5,200.00	CA / 94541	HAYWARD	PEBBLE II, LP
1777 Botelho Dr, Suite #300, Walnut Creek, CA 94596		Bill Brooks (CEO)	Sequoia Equities, inc.	2476234-INC830	7/21/2020	6/29/2020	AMENDMENT #1	LATE CONTRIBUTION RECEIVED	\$7,000.00	CA / 94553 \$7,000.00	MARTINEZ	STAN JONES, INCLUDING RIDGECREST APARTMENTS

F&F 12TH ST. LP	F&F 302 FALLBROOK LP	F&F 303 CLEMMENS LP	MOT I LLC SAN DIEGO	F&F OLD STAGE LLC	F&F SUMNER LLC	F&F SARANAC LP	SOUTH PARK COTTAGES LLC	F&F VERMONT LP	ZEV JABOTINSKY LP	BENTLEY-PLAZA PARTNERS, LP HAYWARD	FELSON FAMILY 1996 PARTNERSHIP LP AND AFFILIATED ENTITIES
CA / 92104 \$	CA / 92104 \$	CA/92104 \$	CA / 92104 \$	CA/92104	CA / 92104 \$	CA/92104 \$	CA / 92104 \$	92104 \$	CA / 92104 \$	94541 \$	CA / 94541 \$
\$1,600.00	\$2,900.00	\$2,200.00	\$1,300.00	\$1,800.00	\$1,300.00	\$6,800.00	\$1,000.00	CA/92104 \$1,200.00	\$2,400.00	CA/94541 \$3,400.00	\$550.00
LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED	LATE CONTRIBUTION RECEIVED
INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL	INITIAL
8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/17/2020	8/5/2020	8/5/2020
8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/18/2020	8/6/2020	8/6/2020
2492819-INC1327	2492819-INC1328	2492819-INC1329	2492819-INC1331	2492819-INC1332	2492819-INC1333	2492819-INC1334	2492819-INC1335	2492819-INC1337	2492819-INC1339	2488950-INC1 128	2488950-INC1129
F and F Income Properties, LLC	F and F Income Properties, LLC	F and F Income Properties, LLC		F and F Income Properties, LLC	F and F Income Properties, LLC	F and F Income Properties, LLC		F and F Income Properties, LLC	F and F Income Properties, LLC	Not listed on SoS website, but a company search lists Joseph L. Felson and B Street address under contact information: https://opencorporates.com/comp anies/us_ca/199700600008	company search lists Joseph L. Felson and B Street address under contact information: https://us.lei.report/LEI/549300F5 QONE9B1LCR74
Dan Feder	Dan Feder	Dan Feder	Dan Feder	Megan Danbach	Megan Danbach	Dan Feder	Dan Feder	Dan Feder	Dan Feder		
4060 30th St, San Diego, CA 92104	4060 30th St, San Diego, CA 92104	4060 30th St, San Diego, CA 92104	201 Lomas Santa Fe Dr. #420, Solana Beach, CA 92075	4060 30th St, San Diego, CA 92104	4060 30th St, San Diego, CA 92104	1940 Market St, San Diego, CA 92102	201 Lomas Santa Fe Dr. #420, Solana Beach, CA 92075	4060 30th St, San Diego, CA 92104	201 Lomas Santa Fe Dr. #420, Solana Beach, CA 92075		
			4060 30th St, San Diego, CA 92104	4060 30th St, San Diego, CA 92104	4060 30th St, San Diego, CA 92104		4060 30th St, San Diego, CA 92104				

10573 W. Pico Blvd, #241, Los Angeles, CA 90064	Dana Glantz	Sea Level B.B., LLC	8/26/2020 2495314-INC1453 Sea Level B.B., LLC	8/26/2020	8/25/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$1,000.00	CA/91436 \$1,000.00	ENCINO	RJ HAV, LP
10573 W. Pico Blvd, #241, Los Angeles, CA 90064	Dana Glantz	Sea Level B.B., LLC	8/26/2020 2495314-INC1454 Sea Level B.B., LLC	8/26/2020	8/25/2020	INITIAL	LATE CONTRIBUTION RECEIVED	\$1,000.00	CA/91436 \$1,000.00	ENCINO	RJ KEL, LP