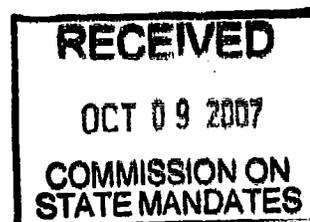


October 5, 2007

Ms. Nancy Patton
Assistant Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814



**RE: Ethics Training Requirements Test Claim
Union Sanitary District, Claimant**

Dear Ms. Patton:

Enclosed you will find the Test Claim as it was submitted by Union Sanitary District through my office on September 13, 2007, and received by your office on September 17.

With regard to your letter of September 28, 2007, indicating that the claim is untimely, as you point out, to which I agree, the statute, Government Code § 17551 (c) controls and provides:

"Local agency and school test claims shall be filed no later than twelve months following the effective date of a statute or executive order, or within twelve months of incurring increased costs as a result of the statute or executive order, whichever is later." (Emphasis added)

You indicated in your letter that the effective date of AB 1234 was October 7, 2005.

However, this claim is based upon expenses which were not incurred until there was compliance with the statute.

Enclosed you will find a photocopy of the check made by Union Sanitary District to me, for services with respect to the preparation of the Ethics Training Manual and delivery of the training, which is dated September 21, 2006.

As a result, the claim was timely filed in that the costs were incurred by Union Sanitary District in late September 2006, and the claim was submitted to your office within twelve months thereafter, complying with Government Code § 17551(c).

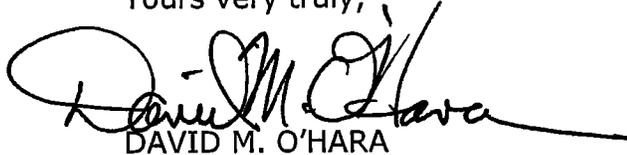
October 5, 2007
Page Two

Unfortunately, there is no claim form, and therefore compliance with statutory limits are not part of the format of a test claim as outlined by your office.

I trust that the enclosed claim will be considered since it obviously timely under the applicable provisions.

If you have any questions, please feel free to contact me at the telephone number on this letterhead.

Yours very truly,



DAVID M. O'HARA

DMO:ss
Enclosures

UNION BANK OF CALIFORNIA
400 California Street
San Francisco, CA 94104

125666

11-83
1210

5072 Benson Road
Union City CA 94587

CHECK NO.
125666

DATE
09/21/06

NET AMOUNT
\$*****22,013.34

VALID FOR 90 DAYS
U.S. DOLLARS

PAY Twenty-Two Thousand Thirteen and 34/100 Dollars *****

TO THE
ORDER
OF

DAVID M O'HARA-ATTORNEY AT LAW
39300 CIVIC CENTER DR
SUITE 110
PREMONT, CA 94538

David M O'Hara
Attorney at Law

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