



May 26, 2026

Ms. Anne Kato
State Controller's Office
Local Government Programs and Services
Division
3301 C Street, Suite 740
Sacramento, CA 95816

Mr. Raymond Palmucci
Office of the San Diego City Attorney
City of San Diego
1200 Third Avenue, Suite 1100
San Diego, CA 92101

And Parties, Interested Parties, and Interested Persons (See Mailing List)

Re: Proposed Statewide Cost Estimate

*Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2
On Remand from City of San Diego v. Commission on State Mandates,
Sacramento County Superior Court, Case No. 24WM000056; Permit Amendment
No. 2017PA-SCHOOLS, City of San Diego Public Water System No. 3710020,
effective January 18, 2017*

Dear Ms. Kato and Mr. Palmucci:

The Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review.

Hearing: This matter is set for hearing on **Friday, June 12, 2026, in person at 10:00 a.m., at California Department of Food and Agriculture (CDFA), First Floor Auditorium, 1220 N Street, Sacramento, California, 95814 and via Zoom.**

The Commission is committed to ensuring that its public meetings are accessible to the public and that the public has the opportunity to observe the meeting and to participate by providing written and verbal comment on Commission matters whether they are physically appearing at the in-person meeting location or participating via Zoom. If you want to speak during the hearing and you are in-person, please come to the table for the swearing in and to speak when your item is up for hearing. If you are participating via Zoom, you must use the "Raise Hand" feature in order for our moderators to know you need to be unmuted.

You may join the meeting via Zoom through the link below and can listen and view through your desktop, laptop, tablet, or smart phone. This will allow you to view documents being shared as well.

There are three options for joining the meeting via Zoom:

1. Through the link below you can listen and view through your desktop, laptop, tablet, or smart phone using Zoom. This will allow you to view documents being shared as well. **(You are encouraged to use this option.)**

<https://csm-ca-gov.zoom.us/j/87374869649?pwd=tmNlglaCA43dbbnzacrgKGTG4NXfzI.1>

Passcode:061226

Ms. Kato and Mr. Palmucci

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2. Through one tap mobile on an iPhone in the US. This process will dial everything for you without having to key in the meeting ID number. If you have the Zoom application on your iPhone you can view the meeting and documents being shared as well.

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3. Through your landline or non-smart mobile phone, either number works. You will be able to listen to the proceedings but will not be able to view the meeting or any documents being shared. If you would like to speak, press #2 to use the "Raise Hand" feature.

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Please don't hesitate to reach out to us for help with technical problems at csminfo@csm.ca.gov or 916 323-3562.

This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on consent and wish to testify at the hearing or have a representative testify on your behalf, and if other witnesses will appear.

Testimony at the Commission Hearing: In that case, please notify Commission staff not later than noon on the Tuesday prior to the hearing, on June 9, 2026. Please also include the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking both in person and remotely to receive a hearing panelist link in Zoom. When calling or emailing, identify the item you want to testify on and the entity you represent. The Commission Chairperson reserves the right to impose time limits on presentations as may be necessary to complete the agenda.

Time to File Written Comments: Any person may submit comments in writing on any agenda item by filing them in accordance with section 1181.3 of the Commission's regulations. If you plan to file any written document, please note that comments filed at least 15 days in advance of the meeting shall be included in the Commissioners' hearing binders, a copy of which is available for public viewing at the Commission meeting. Additionally, comments filed more than five days in advance of the meeting shall be included in the Commission's meeting binders, if feasible, or shall be provided to the Commission when the item is called, unless otherwise agreed by the Commission or the executive director. (Cal. Code Regs., tit. 2, § § 1181.3 and 1181.10(b)(1)(A-B)).

However, written comments filed less than five days in advance of the meeting, the commenter shall electronically file (or e-file) a PDF copy with the Commission via the Commission's e-filing system, available on the Commission's website

<https://www.csm.ca.gov/dropbox.shtml> at least 24 hours prior to the meeting.

Commission staff shall provide copies of the comments to the Commission and shall place a copy on a table for public review when the item is called or, in the case of

Ms. Kato and Mr. Palmucci

May 26, 2026

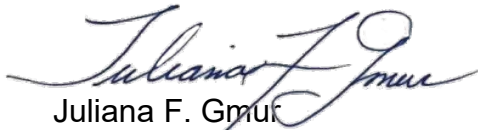
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participation via teleconference, shall provide an electronic copy to the Commission and post a copy on the Commission's website, and may share the document with the Commission and the public using the "share" function. (Cal. Code Regs., tit. 2, §§ 1181.3 and 1181.10(b)(1)(C)).

Postponement: If you would like to request postponement of the hearing, please refer to section 1187.9(b) of the Commission's regulations.

Special Accommodations: For any special accommodations such as a sign language interpreter, an assistive listening device, materials in an alternative format, or any other accommodations, please contact the Commission Office at least five to seven working days prior to the meeting.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Juliana F. Gmuf', written in black ink.

Juliana F. Gmuf
Executive Director

Hearing Date: June 12, 2026

ITEM 9
PROPOSED STATEWIDE COST ESTIMATE

\$0 - \$290,151
Initial Claim Period¹

Permit Amendment No. 2017PA-SCHOOLS, City of San Diego Public Water System
No. 3710020, Effective January 18, 2017

Lead Sampling in Schools: Public Water System No. 3710020

17-TC-03-R2

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on June 12, 2026² as follows:

Member	Vote
Lee Adams, County Supervisor	
Deborah Gallegos, Representative of the State Controller	
Karen Greene Ross, Public Member	
William Pahland, Representative of the State Treasurer, Vice Chairperson	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	
Alexander Powell, Representative of the Director of the Governor's Office of Land Use and Climate Innovation	

STAFF ANALYSIS

Summary of the Mandate, Eligible Claimants, and Period of Reimbursement

This Statewide Cost Estimate addresses state-mandated activities arising from a permit amendment issued by the State Water Resources Control Board (State Water Board) to

¹ The entire reimbursement period is presumed to be within the initial claim period because the permit requires the claimant's public water system, beginning January 18, 2017, to test drinking water in K-12 schools for the presence of lead, upon the request of an authorized representative of the school made *prior to* November 1, 2019.

² The Proposed Statewide Cost Estimate was issued and set for the April 10, 2026 Commission meeting. However, that meeting was rescheduled to May 15, 2026 and then to June 12, 2026 due to a burst pipe and resulting fire making the Commission office inaccessible.

the City of San Diego's public water system, Order No. 2017PA-SCHOOLS and is applicable to the City of San Diego only.

The Commission adopted the Test Claim Decision on March 28, 2025, partially approving reimbursement for the City's increased costs to perform the reimbursable activities under the mandate and adopted the Decision and Parameters and Guidelines on May 23, 2025.

The reimbursement period is January 18, 2017 and is assumed to end by November 1, 2019. January 18, 2017 is the effective date of the permit amendment and November 1, 2019 was the last day for schools to request testing under the test claim permit. Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is required by Health and Safety Code section 116227, and not by the test claim order.

The sole eligible claimant, the City of San Diego, was required to file initial claims with the State Controller's Office (Controller) on or before December 24, 2025. Late initial reimbursement claims may be filed until December 24, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.³

As of February 25, 2026, no reimbursement claims have been filed.

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

1. Submit to the State Water Board's Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter [by the claimant] by July 1, 2017;⁴
2. If an authorized school representative of a private K-12 school or a public K-12 school in the claimant's service area requests lead sampling assistance in writing by November 1, 2019:⁵
 - a. Respond in writing within 60 days and schedule a meeting with school officials to develop a sampling plan;⁶

³ Government Code section 17561(d)(3).

⁴ Exhibit A, Test Claim Decision, page 75, citing to Test Claim, page 105 (test claim order).

⁵ Exhibit A, Test Claim Decision, page 75, citing to Test Claim, page 105 (test claim order).

⁶ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

- b. Finalize a sampling plan and complete initial sampling within 90 days [or an alternative time schedule approved by DDW];⁷
- c. Collect one to five samples at each school, from regularly used drinking fountains, cafeteria or food preparation areas, or reusable bottle filling stations, selected according to the sampling plan, and using the sampling guidance provided in Appendix A;⁸
- d. Collect lead samples during the school year, on a Tuesday, Wednesday, Thursday, or Friday on a day that school is in session and has been in session for at least one day prior to the day of sampling;⁹
- e. Ensure samples are collected by an adequately trained water system representative;¹⁰
- f. Submit the samples to an ELAP certified laboratory for analysis;¹¹
- g. Require the laboratory to submit the data electronically to DDW;¹²
- h. Provide a copy of the results to the school representative;¹³
- i. Within two business days of a result that shows an exceedance of 15 ppb, notify the school of the sample result;¹⁴
- j. If an initial sample shows an exceedance of 15 ppb:

⁷ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

⁸ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

⁹ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹⁰ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹¹ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹² Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹³ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹⁴ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

- Collect an additional sample within 10 days if the sample site remains in service;¹⁵
 - Collect a third sample within 10 business days after notification that a resample result is less than or equal to 15 ppb;¹⁶
 - Collect at least one more lead sample at a sample site where the school has completed some corrective action following an initial lead sample result over 15 ppb;¹⁷
- k. Ensure that the water system receives the results of repeat lead samples from the laboratory in no more than 10 business days;¹⁸
- l. Discuss the lead sample results with the school prior to releasing the sample results to the public, and within 10 days of receiving the results from the laboratory;¹⁹
- m. Communicate with the school after lead sampling and assist the school with the interpretation of laboratory results and provide information regarding potential corrective actions if the results confirm lead levels above 15 ppb.²⁰ ***The water system is not responsible for the costs of any corrective action or maintenance;***²¹
- n. Keep records of all requests for lead related assistance and provide the records to DDW, upon request;²²

¹⁵ Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

¹⁶ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 106 (test claim order).

¹⁷ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

¹⁸ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

¹⁹ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

²⁰ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

²¹ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

²² Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

- o. Include in the annual Consumer Confidence Report a statement summarizing the number of schools requesting lead sampling.²³

Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is not required by the test claim order and is not reimbursable.

Offsetting Revenues and Reimbursements

The Decision and Parameters and Guidelines specify any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds (including, but not limited to grant funds), any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant’s proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.²⁴

As no reimbursement claims were filed, no offsetting revenue was identified.

Statewide Cost Estimate

As no reimbursement claims were filed, staff relied on the claimant’s actual and projected costs included in the Test Claim and the listed assumptions to develop this Statewide Cost Estimate.

Table 1. Reimbursement Period Cost Estimate

1. Submit to the State Water Board’s Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter [by the claimant] by July 1, 2017	[\$0] - [\$6,707]
2. If an authorized school representative of a private K-12 school or a public K-12 school in the claimant’s service area requests lead sampling assistance in writing by November 1, 2019: <ul style="list-style-type: none"> a. Respond in writing within 60 days and schedule a meeting with school officials to develop a sampling plan; b. Finalize a sampling plan and complete initial sampling within 90 days [or an alternative time schedule approved by DDW]; 	[\$0] - [\$315,683]

²³ Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

²⁴ Exhibit B, Decision and Parameters and Guidelines, page 18.

<ul style="list-style-type: none"> c. Collect one to five samples at each school, from regularly used drinking fountains, cafeteria or food preparation areas, or reusable bottle filling stations, selected according to the sampling plan, and using the sampling guidance provided in Appendix A; d. Collect lead samples during the school year, on a Tuesday, Wednesday, Thursday, or Friday on a day that school is in session and has been in session for at least one day prior to the day of sampling; e. Ensure samples are collected by an adequately trained water system representative; f. Submit the samples to an ELAP certified laboratory for analysis; g. Require the laboratory to submit the data electronically to DDW; h. Provide a copy of the results to the school representative; i. Within two business days of a result that shows an exceedance of 15 ppb, notify the school of the sample result; j. If an initial sample shows an exceedance of 15 ppb: <ul style="list-style-type: none"> a. Collect an additional sample within 10 days if the sample site remains in service; b. Collect a third sample within 10 business days after notification that a resample result is less than or equal to 15 ppb; c. Collect at least one more lead sample at a sample site where the school has completed some corrective action following an initial lead sample result over 15 ppb; k. Ensure that the water system receives the results of repeat lead samples from the laboratory in no more than 10 business days; l. Discuss the lead sample results with the school prior to releasing the sample results to the public, 	
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<p>and within 10 days of receiving the results from the laboratory;</p> <p>m. Communicate with the school after lead sampling and assist the school with the interpretation of laboratory results and provide information regarding potential corrective actions if the results confirm lead levels above 15 ppb. <i>The water system is not responsible for the costs of any corrective action or maintenance;</i></p> <p>n. Keep records of all requests for lead related assistance and provide the records to DDW, upon request;</p> <p>o. Include in the annual Consumer Confidence Report a statement summarizing the number of schools requesting lead sampling.</p>	
Indirect Costs identified	\$0
Offsetting Revenues or Other Reimbursements	(\$0)
10 Percent Late Filing Penalty	(\$32,239)
Total Costs	\$0 - \$290,151

Assumptions

1. As noted above, the reimbursement period is January 18, 2017 and is assumed to end by November 1, 2019. January 18, 2017 is the effective date of the permit amendment and November 1, 2019 was the last day for schools to request testing under the test claim permit. Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is required by Health and Safety Code section 116227, and not by the test claim order. Health and Safety Code section 116227 required testing of those older schools regardless of whether a school requested the testing. Therefore, it can reasonably be assumed that the reimbursement period for most of the activities will be within the first year of the permit term (second half of FY 2016-17 and first half of FY 2017-2018). Furthermore, declarations in support of the test claim state that of the more than 400 schools served by the City's public water system, 255 had requested lead sampling by January 1, 2018.
2. The claimant stated in its Test Claim that it incurred \$381,960 in actual costs and projected another \$63,915 in estimated costs for a total of \$445,875 for the initial reimbursement period. However, \$115,725 is for preliminary "program planning" activities that do not fall within the plain language of the approved activities. Additionally, \$7,760 is for costs incurred to perform an activity that the Commission determined was not reimbursable (it was required by preexisting

law). Therefore, the claimant's costs for this program are projected to be \$322,390.²⁵

3. Costs could be lower than the high-end estimate because beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is not required by the test claim order and is not reimbursable.
4. Indirect costs cannot be projected and are, therefore, presumed to be \$0.
5. If claims are filed, the amount claimed for the period of reimbursement may be higher or lower than initial projections in the Test Claim.
6. If claims are filed, costs may be lower if the Controller audits the claims and determines that other offsetting revenues (i.e., funds that are not the claimant's proceeds of taxes) were used by the claimant to pay for the reimbursement activities.
7. If claims are filed, actual costs may be lower if the Controller reduces any claim for this program following an audit deeming the claim to be excessive, unreasonable, or not eligible for reimbursement.

Methodology

Because no claims were filed, and may never be filed, the low-end statewide cost estimate is \$0. As explained below, the high-end statewide cost estimate represents the costs estimated from the Test Claim.²⁶ At this time, any claims filed would be late claims and have a 10% reduction imposed.

Activity 1. consists of the one-time cost of submitting to the State Water Board's Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter, by the claimant, by July 1, 2017. The projected cost is \$6,707.

Activity 2. consists of a series of activities to respond if an authorized school representative of a private K-12 school or a public K-12 school in the claimant's service area requests lead sampling assistance in writing by November 1, 2019. The projected cost is \$315,683.

Indirect Costs: The statewide cost estimate is \$0 because no claims were filed.

Offsetting Revenues: The statewide cost estimate is \$0 because no claims were filed.

Late Filing Penalties: Any claim filed by the claimant will be late and a late filing penalty will be assessed.

Projected Costs [\$322,390] x (10% late filing penalty) = Estimated Late Filing Penalties [\$32,239].

²⁵ Exhibit C, Test Claim, pages 22-51 (test claim narrative).

²⁶ Exhibit C, Test Claim, pages 22-51 (test claim narrative).

Draft Proposed Statewide Cost Estimate

On February 25, 2026, Commission staff issued the Draft Proposed Statewide Cost Estimate.²⁷ No comments were filed on the Draft Proposed Statewide Cost Estimate.

Staff Recommendation

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$0 – \$290,151 for the Initial Claim Period that began on January 18, 2017.

²⁷ Exhibit D, Draft Proposed Statewide Cost Estimate.

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On May 26, 2026, I served the:

- **Current Mailing List dated May 4, 2026**
- **Proposed Statewide Cost Estimate issued May 26, 2026**

Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2
On Remand from City of San Diego v. Commission on State Mandates,
Sacramento County Superior Court, Case No. 24WM000056; Permit
Amendment No. 2017PA-SCHOOLS, City of San Diego Public Water System
No. 3710020, effective January 18, 2017

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on May 26, 2026 at Sacramento, California.



Jill Magee
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814
(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 5/4/26

Claim Number: 17-TC-03-R2

Matter: Lead Sampling in Schools: Public Water System No. 3710020

Claimant: City of San Diego

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

Heather Abrams, Town Manager, *Town of Fairfax*
142 Bolinas Road, Fairfax, CA 94930
Phone: (415) 453-1584
habrams@townoffairfax.org

Jackie Acosta, Finance Director, *City of Union City*
34009 Alvarado-Niles Road, Union City, CA 94587
Phone: (510) 675-5338
JackieA@unioncity.org

Jose Acosta, Utility Director, *City of Solvang*
1644 Oak Street, Solvang, CA 93463
Phone: (805) 688-5575
jacosta@cityofsolvang.com

Gabe Adams, Acting City Manager, *City of Trinidad*
409 Trinity Street, PO Box 390, Trinidad, CA 95570
Phone: (707) 677-3876
cityclerk@trinidad.ca.gov

Aaron Adams, City Manager, *City of Temecula*
41000 Main Street, Temecula, CA 92590
Phone: (951) 506-5100
aaron.adams@temeculaca.gov

Trevor Agrelius, Finance Director, *City of Laguna Niguel*
30111 Crown Valley Parkway, Laguna Niguel, CA 92677
Phone: (949) 362-4358
TAgrelius@cityoflagunaniguel.org

Adaoha Agu, *County of San Diego Auditor & Controller Department*
Projects, Revenue and Grants Accounting, 5530 Overland Avenue, Ste. 410 , MS:O-53, San Diego,
CA 92123

Phone: (858) 694-2129

Adaoha.Agu@sdcounty.ca.gov

Ron Ahlers, Chief Financial Officer, *City of Calabasas*
Finance Department, 100 Civic Center Way, Calabasas, CA 91302

Phone: (805) 517-6249

RAhlers@cityofcalabasas.com

Nicholas Ajluni, Assistant Director of Utilities and Environmental Services, *City of Pleasanton*
PO Box 520, Pleasanton, CA 04566

Phone: (925) 931-5523

najluni@cityofpleasantonca.gov

Jason Al-Imam, Director of Finance, *City of Newport Beach*
3300 Newport Blvd, Newport Beach, CA 92663

Phone: (949) 644-3123

jalimam@newportbeachca.gov

Emily Aldrich, Finance Director, *City of Yreka*

701 Fourth Street, Yreka, CA 96097

Phone: (530) 842-4836

ealdrich@yrekaca.gov

Douglas Alessio, Administrative Services Director, *City of Livermore*
Finance Department, 1052 South Livermore Avenue, Livermore, CA 94550

Phone: (925) 960-4300

finance@cityoflivermore.net

Josefina Alvarez, Interim Finance Director, *City of Kerman*

850 South Madera Avenue, Kerman, CA 93630

Phone: (559) 846-4682

jalvarez@cityofkerman.org

Rachelle Anema, Assistant Auditor-Controller, *County of Los Angeles*
Accounting Division, 500 W. Temple Street, Los Angeles, CA 90012

Phone: (213) 974-8321

RANEMA@auditor.lacounty.gov

Michael Antwine II, City Manager, *City of Bell*

6330 Pine Avenue, Bell, CA 90201

Phone: (323) 588-6211

mantwine@cityofbell.org

Donna Apar, Finance Director, *City of San Marcos*

1 Civic Center Drive, San Marcos, CA 92069

Phone: (760) 744-1050

dapar@san-marcos.net

Lili Apgar, Specialist, *State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 324-0254

lapgar@sco.ca.gov

Socorro Aquino, *State Controller's Office*

Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 322-7522
SAquino@sco.ca.gov

Samantha Argabrite, City Manager, *City of Simi Valley*
2929 Tapo Canyon Road, Simi Valley, CA 93063
Phone: (805) 583-6701
citymgr@simivalley.org

Jose Arreola, City Manager, *City of King City*
212 South Vanderhurst Avenue, King City, CA 93930
Phone: (831) 386-5925
jarreola@kingcity.com

Damien Arrula, City Administrator, *City of Placentia*
401 E. Chapman Avenue, Placentia, CA 92870
Phone: (714) 993-8171
darrula@placentia.org

Elisa Arteaga, City Administrator, *City of Gridley*
685 Kentucky Street, Gridley, CA 95948
Phone: (530) 846-3631
earteaga@gridley.ca.us

Louis Atwell, City Manager, *City of Inglewood*
1 Manchester Boulevard, Inglewood, CA 90301
Phone: (310) 412-5301
latwell@cityofinglewood.org

Carol Augustine, Director of Finance, *City of Burlingame*
501 Primrose Road, Burlingame, CA 94010
Phone: (650) 558-7210
caugustine@burlingame.org

Abel Avalos, City Manager, *City of Artesia*
18747 Clarkdale Avenue, Artesia, CA 90701
Phone: (562) 865-6262
aavalos@cityofartesia.us

Aaron Avery, Legislative Representative, *California Special Districts Association*
1112 I Street Bridge, Suite 200, Sacramento, CA 95814
Phone: (916) 442-7887
Aarona@csda.net

Ana Aviles Avila, City Manager, *City of Pinole*
2131 Pear Street, Pinole, CA 94564
Phone: (510) 724-9837
aavilesavila@pinole.gov

Bill Ayub, City Manager, *City of Ventura*
501 Poli Street, Ventura, CA 93001
Phone: (805) 654-7740
bayub@cityofventura.ca.gov

Karina Bañales, City Manager, *City of Rolling Hills*
2 Portuguese Bend Road, Rolling Hills, CA 90274
Phone: (310) 377-1521
KBanales@CityofRH.net

Van Bach, Accounting Manager, *City of San Rafael*
1400 Fifth Avenue, San Rafael, CA 94901
Phone: (415) 458-5001
van.bach@cityofsanrafael.org

Erin Backs, Finance Director, *City of Westminster*
8200 Westminster Boulevard, Westminster, CA 92683
Phone: (714) 898-3311
eback@westminster-ca.gov

Happy Bains, Interim Finance Director, *City of Livingston*
Administrative Services, 1416 C Street, City of Livingston, CA 95334
Phone: (209) 394-8041
hbains@livingstonca.gov

Valerie Barone, City Manager, *City of Concord*
1950 Parkside Drive, Concord, CA 94519
Phone: (925) 671-3150
valerie.barone@cityofconcord.org

Robert Barron III, Finance Director, *Town of Atherton*
Finance Department, 91 Ashfield Rd, Atherton, CA 94027
Phone: (650) 752-0552
rbarron@ci.atherton.ca.us

Dan Barros, City Manager, *Town of Colma*
1198 El Camino Real, Colma, CA 94014
Phone: (650) 997-8300
dbarros@colma.ca.gov

David Bass, Vice Mayor, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 663-8504
David.Bass@rocklin.ca.us

Gerry Beaudin, City Manager, *City of Pleasanton*
123 Main Street, PO Box 520, Pleasanton, CA 94566
Phone: (925) 931-5002
gbeaudin@cityofpleasantonca.gov

Jennifer Becker, Financial Services Director, *City of Burbank*
275 East Olive Avenue, Burbank, CA 91502
Phone: (818) 238-5500
jbecker@burbankca.gov

Ray Beeman, Chief Fiscal Officer, *City of Gardena*
1700 West 162nd Street, Gardena, CA 90247
Phone: (310) 217-9516
rbeeman@cityofgardena.org

Cameron Begbie, Interim City Manager, *City of Plymouth*
P.O. Box 429, Plymouth, CA 95669
Phone: (209) 245-6941
CBegbie@cityofplymouth.org

Jason Behrmann, Interim City Manager, *City of Elk Grove*
8401 Laguna Palms Way, Elk Grove, CA 95758

Phone: (916) 478-2201
jbehrmann@elkgrovecity.org

Aimee Belev, Finance Director/Town Treasurer, *Town of Paradise*
5555 Skyway, Paradise, CA 95969
Phone: (530) 872-6291
abelev@townofparadise.com

Ginni Bella Navarre, Deputy Legislative Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8342
Ginni.Bella@lao.ca.gov

Joe Bellomo, Public Works Director, *City of Fillmore*
250 Central Avenue, Fillmore, CA 93015
Phone: (805) 524-1500
jbellomo@fillmoreca.gov

Paul Benoit, City Administrator, *City of Piedmont*
120 Vista Avenue, Piedmont, CA 94611
Phone: (510) 420-3042
pbenoit@ci.piedmont.ca.us

Wendy Berry, Administrative Services Director, *City of Solvang*
Finance, 1644 Oak Street, Solvang, CA 93463
Phone: (805) 688-5575
wendyb@cityofsolvang.com

Kevin Biersack, Financial Services Director, *City of Cathedral City*
Administrative Services, 68700 Avenida Lalo Guerrero, Cathedral City , CA 92234
Phone: (760) 770-0378
kbiersack@cathedralcity.gov

Christy Billings, Interim Finance Director, *City of Ojai*
401 S. Ventura Street, Ojai, CA 93023
Phone: (805) 646-5581
christy.billings@ojai.ca.gov

Teresa Binkley, Director of Finance, *City of Taft*
Finance Department, 209 E. Kern St. , Taft, CA 93268
Phone: (661) 763-1350
tbinkley@cityoftaft.org

Benjamin Bitter, City Manager, *City of Maricopa*
400 California Street, Maricopa, CA 93252
Phone: (520) 316-6811
eziegler@bak.rr.com

Dalacie Blankenship, Finance Manager, *City of Jackson*
Administration / Finance, 33 Broadway, Jackson, CA 95642
Phone: (209) 223-1646
dblankenship@ci.jackson.ca.us

Michael Blay, City Manager, *City of Upland*
460 N. Euclid Avenue, Upland, CA 91786-4732
Phone: (909) 931-4106
CityManager@UplandCA.gov

Todd Bodem, City Administrator, *City of Guadalupe*
918 Obispo Street, P.O. Box 908, Guadalupe, CA 93434
Phone: (805) 356-3891
todd.bodem@cityofguadalupe.org

Lincoln Bogard, Administrative Services Director, *City of Banning*
99 East Ramsey Street, Banning, CA 92220
Phone: (951) 922-3118
lbogard@banningca.gov

Konrad Bolowich, City Manager, *City of Grand Terrace*
22795 Barton Road, Grand Terrace, CA 92313-5295
Phone: (909) 954-5175
kbolowich@grandterrace-ca.gov

Ryan Bonk, City Manager, *City of Portola*
P.O. Box 1225, Portola, CA 96122
Phone: (530) 832-6800
citymanager@cityofportola.com

Matthew Boring, Interim Director of Finance, *City of Manteca*
1001 West Center Street, Manteca, CA 95337
Phone: (209) 456-8730
mboring@manteca.gov

Jonathan Borrego, City Manager, *City of Oceanside*
300 North Coast Highway, Oceanside, CA 92054
Phone: (760) 435-3065
citymanager@oceansideca.org

Jaime Boscarino, Finance Director, *City of Thousand Oaks*
2100 Thousand Oaks Boulevard, Thousand Oaks, CA 91362
Phone: (805) 449-2220
jboscarino@toaks.gov

Jason Bradford, Finance Director, *City of Glendale*
141 N. Glendale Ave, Room 346, Glendale, CA 91206
Phone: (818) 548-2085
jbradford@glendaleca.gov

Roger Bradley, City Manager, *City of Downey*
11111 Brookshire, Downey, CA 90241-7016
Phone: (562) 904-7284
citymanager@downeyca.org

David Brandt, City Manager, *City of Cupertino*
10300 Torre Avenue, Cupertino, CA 95014-3202
Phone: 408.777.3212
manager@cupertino.org

Kerry Breen, Director of Finance & Information Systems, *City of Brentwood*
150 City Park Way, Brentwood, CA 94513
Phone: (925) 516-5460
kbreen@brentwoodca.gov

Molly Brennan, Director of Finance, *City of National City*
1243 National City Blvd., National City, CA 91950

Phone: (619) 336-4330
finance@nationalcityca.gov

Sean Brewer, Interim City Manager, *City of Coalinga*
155 West Durian, Coalinga, CA 93210
Phone: (559) 935-1533
sbrewer@coalinga.com

Kathy Brewton, Finance Director, *City of Ridgecrest*
100 West California Avenue, Ridgecrest, CA 93555
Phone: (760) 499-5021
kbrewton@ridgecrest-ca.gov

Roel Briones, Interim Finance Director, *City of Farmersville*
909 W Visalia Road, Farmersville, CA 93223
Phone: (559) 747-0458
fdtemp@cityoffarmersville-ca.gov

Matthew Bronson, City Manager, *City of Grover Beach*
154 South 8th Street, Grover Beach, CA 93433
Phone: (805) 473-4567
mbronson@groverbeach.org

Joshua Brooks, Deputy Director of Administrative Services, *City of Irvine*
1 Civic Center Plaza, Irvine, CA 92606
Phone: (949) 724-6263
JoBrooks@cityofirvine.org

Jessica Brown, Chief Financial Officer, *City of Fontana*
8353 Sierra Avenue, Fontana, CA 92335
Phone: (909) 350-7679
jbrown@fontana.org

Troy Brown, City Manager, *City of Moorpark*
323 Science Drive, Moorpark, CA 93021
Phone: (805) 517-6212
citymanager@moorparkca.gov

Dan Buckshi, City Manager, *City of Walnut Creek*
1666 North Main Street, Walnut Creek, CA 94596
Phone: (925) 943-5812
Buckshi@walnut-creek.org

Christa Buhagiar, Director of Finance/Treasurer, *City of Chino Hills*
14000 City Center Drive, Chino Hills, CA 91709
Phone: (909) 364-2460
cbuhagiar@chinohills.org

Buffy Bullis, Administrative Services Director/Finance Director, *City of Monrovia*
415 S. Ivy Ave, Monrovia, CA 91016
Phone: (626) 932-5513
bbullis@ci.monrovia.ca.us

Dahle Bulosan, Director of Administrative Services, *City of Irvine*
One Civic Center Plaza, Irvine, CA 92606
Phone: (949) 724-6263
DBulosan@cityofirvine.org

Allan Burdick,

7525 Myrtle Vista Avenue, Sacramento, CA 95831

Phone: (916) 203-3608

allanburdick@gmail.com

Guy Burdick, Consultant, *MGT Consulting*

2251 Harvard Street, Suite 134, Sacramento, CA 95815

Phone: (916) 833-7775

gburdick@mgtconsulting.com

Aaron Busch, Interim City Manager, *City of Lodi*

221 W Pine Street, Lodi, CA 95240

Phone: (209) 333-6700

citymanager@lodi.gov

Rod Butler, City Manager, *City of Jurupa Valley*

8930 Limonite Avenue, Jurupa Valley, CA 92509

Phone: (951) 332-6464

rbutler@jurupavalley.org

Rica Mae Cabigas, Chief Accountant, *Auditor-Controller*

Accounting Division, 500 West Temple Street, Los Angeles, CA 90012

Phone: (213) 974-8309

rcabigas@auditor.lacounty.gov

Elizabeth Cabrera, City Manager, *City of San Joaquin*

21900 Colorado Avenue, San Joaquin, CA 93660

Phone: (559) 693-4311

elizabethc@cityofsanjoaquin.org

Evelyn Calderon-Yee, Bureau Chief, *State Controller's Office*Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816

Phone: (916) 324-5919

ECalderonYee@sco.ca.gov

Daniel Calleros, Interim City Administrator, *City of Vernon*

4305 Santa Fe Avenue, Vernon, CA 90058

Phone: (323) 583-8811

Dcalleros@cityofvernonCA.gov

Rebecca Campbell, Finance Director, *City of Santa Maria*

110 E. Cook Street, Santa Maria, CA 93454

Phone: (805) 925-0951

rcampbell@cityofsantamaria.org

Casha Cappuccio, Associate Attorney, *Brown and Winters*

3916 Riviera Drive, Apt 102, San Diego, CA 92109

Phone: (401) 787-1514

ccappuccio@brownandwinters.com

Steve Carmona, City Manager, *City of Pico Rivera*

6615 Passons Boulevard, Pico Rivera, CA 90660

Phone: (562) 801-4371

scarmona@pico-rivera.org

Pamela Caronongan, City Administrator, *City of Angels Camp*

200 Monte Verda Street, Ste. B, PO Box 667 Angels Camp, Angels Camp, CA 95222

Phone: (209) 736-2181
pamelacaronongan@angelscamp.gov

Pete Carr, City Manager/Finance Director, *City of Orland*
PO Box 547, Orland, CA 95963
Phone: (530) 865-1602
CityManager@cityoforland.com

Manuel Carrillo, Director of Finance and Administrative Services, *City of Bell Gardens*
7100 Garfield Ave, Bell Gardens, CA 90201
Phone: (562) 806-7700
MCarrillo@bellgardens.org

Roger Carroll, Finance Director/Treasurer, *Town of Loomis*
Finance Department, 3665 Taylor Road, Loomis, CA 95650
Phone: (916) 652-1840
rcarroll@loomis.ca.gov

Yulia Carter, Interim City Manager, *City of Pacifica*
170 Santa Maria Avenue, Pacifica, CA 94044
Phone: (650) 738-7409
ycarter@pacifica.gov

Nicole Casey, Administrative Services Director, *Town of Truckee*
10183 Truckee Airport Road, Truckee, CA 96161
Phone: (530) 582-2935
ncasey@townoftruckee.com

Arturo Castillo, Administrative Services Director, *City of San Pablo*
1000 Gateway Avenue, San Pablo, CA 94806
Phone: (510) 215-3021
AECastillo@sanpabloca.gov

Leslie Caviglia, City Manager, *City of Visalia*
707 West Acequia Avenue, Visalia, CA 93291
Phone: (559) 713-4332
leslie.caviglia@visalia.city

Julissa Ceja Cardenas, Legislative Analyst, *California State Association of Counties*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
jcejacardenas@counties.org

Mitchell Celaya, Interim City Manager, *City of Calistoga*
1232 Washington Street, Calistoga, CA 94515
Phone: (707) 584-6201
mcelaya@calistogaca.gov

Lisa Celaya, Executive Assistant Director, *City of San Diego*
Public Utilities Department, 9192 Topaz Way, San Diego, CA 92123
Phone: (858) 614-4042
lcelaya@sandiego.gov

David Cerda, Acting City Manager, *City of Parlier*
1100 East Parlier Avenue, Parlier, CA 93648
Phone: (559) 646-3545
dcerda@parlier.ca.us

Javier Chagoyen-Lazaro, Chief Financial Officer, *City of Oxnard*
300 West Third Street, Third Floor, Oxnard, CA 93030
Phone: (805) 200-5400
javier.chagoyenlazaro@oxnard.org

Ellis Chang, Director of Administrative Services, *City of Mission Viejo*
200 Civic Center, Mission Viejo, CA 92691
Phone: (949) 470-3059
admins@cityofmissionviejo.org

Ashley Chaparro, Deputy Finance Director, *City of Port Hueneme*
250 North Ventura Road, Port Hueneme, CA 93041
Phone: (805) 986-6524
achaparro@ci.port-hueneme.ca.us

Sheri Chapman, General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8267
schapman@calcities.org

Rolando Charvel, Chief Financial Officer, *City of San Diego*
Claimant Contact
202 C Street, 9th Floor, San Diego, CA 92101
Phone: (619) 236-6218
rcharvel@sandiego.gov

Diego Chavez, Administrative Services Director, *City of Murrieta*
1 Town Square, Murrieta, CA 92562
Phone: (951) 461-6437
dchavez@murrietaca.gov

Veronica Chavez, Director of Finance, *City of Palm Desert*
73510 Fred Waring Drive, Palm Desert, CA 92260
Phone: (760) 776-6320
vchavez@palmdesert.gov

Ali Chemkhi, Senior Supervising Accountant/Auditor, *County of San Bernardino*
Office of Auditor-Controller, 268 West Hospitality Lane, Fourth Floor, San Bernardino, CA 92415-0018
Phone: (909) 382-7035
ali.chemkhi@sbcountyatc.gov

Henry Chen, Acting Financial Services Manager, *City of Arcadia*
240 West Huntington Drive, Arcadia, CA 91007
Phone: (626) 574-5427
hchen@ArcadiaCA.gov

Erick Cheung, Finance Manager, *City of Pleasant Hill*
100 Gregory Lane, Pleasant Hill, CA 94523
Phone: (925) 671-5231
echeung@pleasanthillca.org

Matthew Chidester, City Manager, *City of Half Moon Bay*
501 Main Street, Half Moon Bay, CA 94019
Phone: (650) 726-8272
MChidester@hmcity.com

Annette Chinn, Consultant, *Cost Recovery Systems, Inc.*
705-2 East Bidwell Street, #294, Folsom, CA 95630
Phone: (916) 939-7901
achinnrcrs@aol.com

David Chiu, City Attorney, *City and County of San Francisco*
Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102
Phone: (415) 554-4700
cityattorney@sfcityatty.org

Lawrence Chiu, Finance Director, *City of Emeryville*
1333 Park Ave, Emeryville, CA 94608
Phone: (510) 596-4352
Lawrence.Chiu@emeryville.org

DeAnna Christensen, Director of Finance, *City of Modesto*
1010 10th Street, Suite 5200, Modesto, CA 95354
Phone: (209) 577-5371
dachristensen@modestogov.com

Carolyn Chu, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8326
Carolyn.Chu@lao.ca.gov

Carmen Chu, Assessor-Recorder, *City and County of San Francisco*
1 Dr. Carlton B. Goodlett Place, City Hall, Room 190, San Francisco, CA 94102-4698
Phone: (415) 554-5596
assessor@sfgov.org

Paul Chung, Director of Finance, *City of El Segundo*
350 Main Street, El Segundo, CA 90245-3813
Phone: (310) 524-2315
pchung@elsegundo.org

City Clerk, City Clerk, *City of Amador City*
14531 East School Street, P.O. Box 200, Amador City, CA 95601
Phone: (209) 267-0682
city.clerk@amador-city.com

Justin Clifton, City Manager, *City of Murrieta*
1 Town Square, Murrieta, CA 92562
Phone: (951) 461-6010
jclifton@murrietaca.gov

Luv Cofresi, Finance Director, *City of Milpitas*
455 East Calaveras Boulevard, Milpitas, CA 95035
Phone: (408) 586-3111
lcofresi-howe@milpitas.gov

Steve Colangelo, Interim City Manager, *City of Stockton*
425 North El Dorado Street, Stockton, CA 95202
Phone: (209) 937-8212
city.manager@stocktonca.gov

Michael Coleman, Fiscal Policy Advisor, *Coleman Advisory Services*
2217 Isle Royale Lane, Davis, CA 95616

Phone: (530) 758-3952
coleman@muni1.com

Ashley Collick, City Manager, *City of San Juan Bautista*
311 Second Street P.O. Box 1420, San Juan Bautista, CA 95045
Phone: (831) 623-4661
citymanager@san-juan-bautista.ca.us

Stephen Conway, Director of Finance, *Town of Los Gatos*
110 E. Main Street, Los Gatos, CA 95031
Phone: N/A
sconway@losgatosca.gov

Steve Conway, Interim Assistant City Manager/Admin Services Director, *City of Morro Bay*
595 Harbor Street, Morro Bay, CA 93442
Phone: (805) 772-6217
sconway@morrobayca.gov

Bryan Cook, City Manager, *City of Temple City*
9701 Las Tunas Drive , Temple City , CA 91780
Phone: (626) 285-2171
bcook@templecity.us

Julia Cooper, Director of Finance, *City of San Jose*
Finance, 200 East Santa Clara Street, San Jose, CA 95113
Phone: (408) 535-7000
Finance@sanjoseca.gov

Christine Cordon, City Manager, *City of Westminster*
8200 Westminster Blvd, Westminster, CA 92683
Phone: (714) 548-3178
CCordon@westminster-ca.gov

Melanie Correa, Interim City Manager, *City of Gustine*
352 Fifth Street, Gustine, CA 95322
Phone: (209) 854-9407
mcorrea@cityofgustine.com

Erika Cortez, Administrative Services Director, *City of Imperial Beach*
825 Imperial Beach Boulevard, Imperial Beach, CA 91932
Phone: (619) 423-8303
ecortez@imperialbeachca.gov

Elisa Cox, City Manager, *City of Rancho Cucamonga*
10500 Civic Center Drive, Rancho Cucamonga, CA 91730
Phone: (909) 477-2700
elisa.cox@cityofrc.us

Mallory Crecelius, Interim City Manager, *City of Blythe*
235 N. Broadway, Blythe, CA 92225
Phone: (760) 922-6161
msutterfield@cityofblythe.ca.gov

Kuylar Crocker, Interim City Manager, *City of Lindsay*
251 E. Honolulu St., Lindsay, CA 93247
Phone: (559) 562-7102
kcrocker@lindsay.ca.us

Robert Cross, Financial Services Manager, *City of Lompoc*
100 Civic Center Plaza, Lompoc, CA 93438-8001
Phone: (805) 736-1261
r_cross@ci.lompoc.ca.us

Sean Crumby, Interim City Manager, *City of Irvine*
One Civic Center Plaza, Irvine, CA 92623-9575
Phone: (949) 724-6246
scrumby@cityofirvine.org

Nate Cruz, Finance Director, *City of Foster City*
610 Foster City Blvd., Foster City, CA 94404
Phone: (650) 286-3204
ncruz@fostercity.org

Amy Cunningham, Administrative Services Director, *City of Novato*
922 Machin Avenue, Novato, CA 94945
Phone: (415) 899-8918
ACunningham@novato.org

Gavin Curran, Acting City Manager, *City of Laguna Beach*
505 Forest Avenue, Laguna Beach, CA 92651
Phone: (949) 497-0754
gcurran@lagunabeachcity.net

Cindy Czerwin, Director of Administrative Services, *City of Watsonville*
250 Main Street, Watsonville, CA 95076
Phone: (831) 768-3450
cindy.czerwin@cityofwatsonville.org

Stacey Dabbs, Finance Director, *City of Colton*
650 N La Cadena Drive, Colton, CA 92324
Phone: (909) 370-5052
sdabbs@coltonca.gov

Santino Danisi, Finance Director / City Controller, *City of Fresno*
2600 Fresno St. Rm. 2157, Fresno, CA 93721
Phone: (559) 621-2489
Santino.Danisi@fresno.gov

Chuck Dantuono, Director of Administrative Services, *City of Highland*
Administrative Services, 27215 Base Line, Highland, CA 92346
Phone: (909) 864-6861
cdantuono@cityofhighland.org

Fran David, City Manager, *City of Hayward*
Finance Department, 777 B Street, Hayward, CA 94541
Phone: (510) 583-4000
citymanager@hayward-ca.gov

Doug Davis, City Manager, *Town of Hillsborough*
1600 Floribunda Ave, Hillsborough, CA 94010
Phone: (650) 375-7400
citymanager@hillsborough.net

Jon Davis, Town Manager, *Town of Windsor*
9291 Old Redwood Hwy, Bldg 400, Windsor, CA 95492

Phone: (707) 838-5335
jdavis@townofwindsor.ca.gov

Rob de Geus, City Manager, *City of Westlake Village*
31200 Oakcrest Drive, Westlake Village, CA 91361
Phone: (808) 706-1613
rob@wlv.org

Thomas Deak, Senior Deputy, *County of San Diego*
Office of County Counsel, 1600 Pacific Highway, Room 355, San Diego, CA 92101
Phone: (619) 531-4810
Thomas.Deak@sdcountry.ca.gov

Gigi Decavalles-Hughes, Director of Finance, *City of Santa Monica*
Finance, 1717 4th Street, Suite 250, Santa Monica, CA 90401
Phone: (310) 458-8281
gigi.decavalles@smgov.net

Andrew F. DeGraca, Water Quality Division Director, *San Francisco Public Utilities Commission*
1657 Rollins Road, Burlingame, CA 94010
Phone: (650) 652-3102
adegraca@sfwater.org

Sharon Del Rosario, Finance Director, *City of Stanton*
7800 Katella Ave, Stanton, CA 90680
Phone: (714) 890-4226
sdelrosario@stantonca.gov

Shannon DeLong, Assistant City Manager, *City of Whittier*
13230 Penn Street, Whittier, CA 90602
Phone: (562) 567-9301
admin@cityofwhittier.org

Keith DeMartini, Director of Finance, *City of Santa Barbara*
P.O. Box 1990, Santa Barbara, CA 93102-1990
Phone: (805) 564-5336
KDemartini@SantaBarbaraCA.gov

Jeremy Dennis, City Manager, *City of Brisbane*
50 Park Place, Brisbane, CA 94005
Phone: (415) 508-2110
jdennis@brisbaneca.org

Nicole Denow, Chief Deputy City Attorney, *City of San Diego*
Environment Section, 1200 Third Avenue, Suite 1100, San Diego, CA 92101
Phone: (619) 533-6173
NDenow@sandiego.gov

Lana Dich, Director of Fiance and Administrative Services, *City of Santa Fe Springs*
11710 East Telegraph Road, Santa Fe Springs, CA 90670
Phone: (562) 409-7520
lanadich@santafesprings.org

Deston Dishion, City Administrator, *City of Bishop*
377 West Line Street, Bishop, CA 93514
Phone: (760) 873-5863
ddishion@cityofbishop.ca.gov

Steven Dobrenen, Finance Director, *City of Cudahy*
5220 Santa Ana Street, Cudahy, CA 90201
Phone: (831) 386-5925
sdobrenen@cityofcudahyca.gov

Ken Domer, City Manager, *City of La Verne*
3660 "D" Street, La Verne, CA 91750
Phone: (909) 596-8726
kdomer@cityoflaverne.org

Dario Dominguez, Interim City Manager, *City of Orange Cove*
633 Sixth Street, Orange Cove, CA 93646
Phone: (559) 626-4488
ddominguez@cityoforangecove.com

Christie Donnelly, Finance Director, *City of South San Francisco*
400 Grand Ave, South San Francisco, CA 94080
Phone: (650) 877-8505
christie.donnelly@ssfca.gov

June Du, Finance Director, *City of Los Altos*
1 North San Antonio Road, Los Altos, CA 94022
Phone: (650) 947-2700
jdu@losaltosca.gov

Tom DuBois, City Manager, *City of Sutter Creek*
18 Main Street, Sutter Creek, CA 95685
Phone: (209) 215-4890
info@cityofsuttercreek.org

G. Harold Duffey, City Manager, *City of Brentwood*
150 City Park Way, Brentwood, CA 94513
Phone: (925) 516-5440
CityManager@brentwoodca.gov

David Dunn, City Administrator, *City of Montague*
230 South 13th Street, Montague, CA 96064
Phone: (530) 459-3030
clerk@cityofmontagueca.com

Randall L. Dunn, City Manager, *City of Colusa*
Finance Department, 425 Webster St. , Colusa, CA 95932
Phone: (530) 458-4740
citymanager@cityofcolusa.com

Jimmy Duran, Interim City Manager, *City of Brawley*
383 Main Street, Brawley, CA 92227
Phone: (760) 351-3048
jduran@brawley-ca.gov

Pamela Eastlick, City Clerk/Director of Finance, *City of Etna*
442 Main Street, PO Box 460, Etna, CA 96027-0460
Phone: (530) 467-5256
p.eastlick@etnaca.gov

Michael Egan, City Manager, *City of La Palma*
7822 Walker Street, La Palma, CA 90623

Phone: (714) 690-3300
citymanager@lapalmaca.gov

Ann Eifert, Director of Financial Services/City Treasurer, *City of Aliso Viejo*
12 Journey, Suite 100, Aliso Viejo, CA 92656-5335
Phone: (949) 425-2520
aeifert@avcity.org

Cody Einfalt, Acting City Manager, *Town of Los Altos Hills*
26379 Fremont Road, Los Altos Hills, CA 94022
Phone: (650) 941-7222
ceinfalt@losaltoshills.ca.gov

Adam Ennis, City Administrator, *City of Exeter*
100 North C Street, P.O. Box 237, Exeter, CA 93221
Phone: (559) 592-4539
adam@exetercityhall.com

Edward Enriquez, Interim Assistant City Manager/CFO Treasurer, *City of Riverside*
3900 Main Street, Riverside, CA 92501
Phone: N/A
EEnriquez@riversideca.gov

Tina Envia, Finance Manager, *City of Waterford*
Finance Department, 101 E Street, Waterford, CA 95386
Phone: (209) 874-2328
finance@cityofwaterford.org

Vic Erganian, Deputy Finance Director, *City of Pasadena*
Finance Department, 100 N. Garfield Ave, Room S348, Pasadena, CA 91109-7215
Phone: (626) 744-4355
verganian@cityofpasadena.net

Chris Erias, Interim City Manager, *City of Galt*
380 Civic Drive, Galt, CA 95632
Phone: (209) 366-7100
cerias@cityofgalt.org

Eric Erickson, Director of Finance and Human Resources , *City of Mill Valley*
Department of Finance and Human Resources , 26 Corte Madera Avenue , Mill Valley, CA 94941
Phone: (415) 388-4033
finance@cityofmillvalley.org

Paul Espinoza, Interim Finance Director, *City of Paramount*
16400 Colorado Avenue, Paramount, CA 90723
Phone: (562) 220-2200
pespinoza@paramountcity.com

Ashley Feeney, City Manager, *City of Citrus Heights*
6360 Fountain Square Drive, Citrus Heights, CA 95621
Phone: (916) 725-2448
citymanager@citrusheights.net

Nadia Feeser, Administrative Services Director, *City of Pismo Beach*
Finance Department, 760 Mattie Road, Pismo Beach, CA 93449
Phone: (805) 773-7010
nfeeser@pismoeach.org

Heather Ferbert, City Attorney, *City of San Diego*
1200 Third Avenue, Suite 1100, San Diego, CA 92101-4100
Phone: (619) 533-5800
hferbert@sandiego.gov

Matthew Fertal, City Manager, *City of Garden Grove*
Finance Department, 11222 Acacia Parkway, Garden Grove, CA 92840
Phone: (714) 741-5000
CityManager@ci.garden-grove.ca.us

Laura Fischer, City Manager, *City of Westmorland*
355 S.Center Street, Westmorland, CA 92281
Phone: (760) 344-3411
lfischer@cityofwestmorland.net

Kevin Fisher, Assistant City Attorney, *City of San Jose*
Environmental Services, 200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1987
kevin.fisher@sanjoseca.gov

Tim Flanagan, CIO-Registrar of Voters, *County of Solano*
Registrar of Voters, 678 Texas Street, Suite 2600, Fairfield, CA 94533
Phone: (707) 784-3359
Elections@solanocounty.com

Alan Flora, Finance Director, *City of Clearlake*
14050 Olympic Drive, Clearlake, CA 95422
Phone: (707) 994-8201
aflora@clearlake.ca.us

Bruce Foltz, Director of Finance, *City of Corona*
400 South Vicentia Ave., Corona, CA 92882
Phone: (951) 279-3532
Bruce.Foltz@coronaca.gov

Sandy Fonseca, Interim Finance Director, *City of Calexico*
608 Heber Ave, Calexico, CA 92231
Phone: (760) 768-2123
sfonseca@calexico.ca.gov

Jennifer Fordyce, Assistant Chief Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, 22nd floor, Sacramento, CA 95814
Phone: (916) 324-6682
Jennifer.Fordyce@waterboards.ca.gov

Anthony Forestiere, Acting Finance Director, *City of Madera*
205 West Fourth Street, Madera, CA 93637
Phone: (559) 661-5454
aforestiere1@madera.gov

Dan Fox, City Manager, *City of Diamond Bar*
21810 Copley Drive, Diamond Bar, CA 91765
Phone: (909) 839-7010
dfox@diamondbarca.gov

Aaron France, City Manager, *City of Buena Park*
6650 Beach Boulevard, Second Floor, Buena Park, CA 90621

Phone: (714) 562-3550
afrance@buenapark.com

Steve Franks, City Manager, *City of Villa Park*
17855 Santiago Blvd, Villa Park, CA 92861
Phone: (714) 998-1500
sfranks@villapark.org

Jaylen French, Interim City Manager, *City of Escalon*
2060 McHenry Avenue, Escalon, CA 95320
Phone: (209) 691-7400
jfrench@cityofescalon.org

Nora Frimann, City Attorney, *City of San Jose*
200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1900
nora.frimann@sanjoseca.gov

Elizabeth Fuchen, Interim Finance Director, *City of El Centro*
1275 Main Street, El Centro , CA 92243
Phone: (760) 337-4573
efuchen@cityofelcentro.org

Melanie Gaboardi, Assistant Finance Director, *City of Tulare*
411 East Kern Ave., Tulare, CA 93274
Phone: (559) 685-2300
mgaboardi@tulare.ca.gov

Patrick Gallegos, Interim City Manager, *City of Seal Beach*
211 8th Street, Seal Beach, CA 90740
Phone: (562) 431-2527
pgallegos@sealbeachca.gov

Marlene Galvan, Deputy Finance Officer, *City of Fontana*
8353 Sierra Ave, Fontana, CA 92335
Phone: (909) 350-7671
Mgalvan@fontana.org

Alex Gammelgard, Interim City Manager/Police Chief, *City of Grass Valley*
125 East Main Street, Grass Valley, CA 95945
Phone: (530) 274-4312
chief@grassvalleyca.gov

Anna Garan, Finance Director, *City of Bellflower*
Finance Department, 16600 Civic Center Dr, Bellflower, CA 90706
Phone: (562) 804-1424
agaran@bellflower.ca.gov

Jorge Garcia, Interim City Manager, *City of Pismo Beach*
760 Mattie Road, Pismo Beach, CA 93449
Phone: (805) 773-7007
finance@pismo-beach.org

Rebecca Garcia, Executive Assistant To City Manager, *City of San Bernardino*
300 North , San Bernardino, CA 92418-0001
Phone: (909) 384-7272
garcia_re@sbcity.org

Marisela Garcia, Finance Director, *City of Riverbank*
Finance Department, 6707 Third Street , Riverbank, CA 95367
Phone: (209) 863-7109
mhgarcia@riverbank.org

Danielle Garcia, Director of Finance, *City of Redlands*
PO Box 3005, Redlands, CA 92373
Phone: (909) 798-7510
dgarcia@cityofredlands.org

Martha Garcia, Director of Management Services, *City of Monterey Park*
320 West Newmark Ave, Monterey Park, CA 91754
Phone: (626) 307-1349
magarcia@montereypark.ca.gov

David Gassaway, City Manager, *City of Fairfield*
1000 Webster Street, Fairfield,
Phone: (707) 428-7398
dgassaway@fairfield.ca.gov

Greg Gatzka, City Manager, *City of Corcoran*
832 Whitley Avenue, Corcoran, CA 93212
Phone: (559) 992-2151
greg.gatzka@cityofcorcoran.com

Elizabeth Gibbs, City Manager, *City of Beaumont*
550 E. 6th Street, Beaumont, CA 92223
Phone: (951) 769-8520
egibbs@beaumontca.gov

David Gibson, Executive Officer, *San Diego Regional Water Quality Control Board*
9174 Sky Park Court, Suite 100, San Diego, CA 92123-4340
Phone: (858) 467-2952
dgibson@waterboards.ca.gov

Carmen Gil, City Manager, *City of Gonzales*
147 FOURTH ST, P.O. BOX 647, Gonzales, CA 93926
Phone: (831) 675-5000
cgil@ci.gonzales.ca.us

Juliana Gmur, Executive Director, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
juliana.gmur@csm.ca.gov

Shannon Prentice Godfrey, Senior Management Analyst, *City of Fillmore*
250 Central Avenue, Fillmore, CA 93015
Phone: (805) 524-1500
sgodfrey@fillmoreca.gov

Jose Gomez, Director of Finance and Administrative Services, *City of Lakewood*
5050 Clark Avenue, Lakewood, CA 90712
Phone: (562) 866-9771
jgomez@lakewoodcity.org

Grizelle Gonzalez, Administrative Services Director, *City of Hollister*
375 Fifth Street, Hollister, CA 95023

Phone: (831) 636-4301
Grizelle.Gonzalez@Hollister.CA.Gov

Cristian Gonzalez, City Manager/Planning Director, *City of Mendota*
643 Quince St., Mendota, CA 93640
Phone: (559) 655-4298
cristian@cityofmendota.com

Gabe Gonzalez, City Administrator, *City of Gilroy*
7351 Rosanna Street, Gilroy, CA 95020
Phone: (408) 846-0202
Denise.King@cityofgilroy.org

Sergio Gonzalez, City Manager, *City of Azusa*
213 E Foothill Boulevard, Azusa, CA 91702
Phone: (626) 812-5239
Sergio.Gonzalez@AzusaCa.Gov

Jim Goodwin, City Manager, *City of Live Oak*
9955 Live Oak Blvd., Live Oak, CA 95953
Phone: (530) 695-2112
liveoak@liveoakcity.org

Chris Gorsky, City Administrator, *City of Sonora*
94 North Washington Street, Sonora, CA 95370
Phone: (209) 532-4541
cgorsky@sonoraca.com

Greg Grammar, City Manager, *City of Rolling Hills Estates*
4045 Rolling Hills Estates, Rolling Hills Estates, CA 90274
Phone: (310) 377-1577
GregG@rollinghillsestates.gov

Peter Grant, City Manager, *City of Yorba Linda*
4845 Casa Loma Avenue, Yorba Linda, CA 92886
Phone: (714) 961-7100
pgrant@yorbalingca.gov

Sean Grayson, Interim City Manager, *City of California City*
21000 Hacienda Blvd, California City, CA 93505
Phone: (760) 373-7170
Sgrayson@californiacity-ca.gov

Kristin Griffith, City Manager, *City of Brea*
1 Civic Center Circle, Brea, CA 92821
Phone: (714) 990-7710
kristing@cityofbrea.gov

John Gross, Director of Finance, *City of Long Beach*
333 W. Ocean Blvd., 6th Floor, Long Beach, CA 90802
Phone: N/A
john.gross@longbeach.gov

Troy Grunklee, Director of Administrative Services, *City of La Puente*
15900 East Main Street, La Puente, CA 91744
Phone: (626) 855-1500
tgrunklee@lapuente.org

Juan Guerreiro, Director, *City of San Diego*
Public Utilities Department, 9192 Topaz Way, San Diego, CA 92123
Phone: (858) 292-6436
jguerreiro@sandiego.gov

John Guertin, City Manager, *City of Del Rey Oaks*
650 Canyon Del Rey Road, Del Rey Oaks, CA 93940
Phone: (831) 394-8511
JGuertin@DelReyOaks.org

David Guhin, City Manager, *City of Sonoma*
1 The Plaza , Sonoma, CA 95476
Phone: (707) 933-2213
dguhin@sonomacity.org

Hillary Guirola-Leon, Finance Director, *City of San Marino*
2200 Huntington Drive, San Marino, CA 91108
Phone: (626) 300-0708
hguirola-leon@sanmarinoca.gov

Shelly Gunby, Director of Financial Management, *City of Winters*
Finance, 318 First Street, Winters, CA 95694
Phone: (530) 795-4910
shelly.gunby@cityofwinters.org

Diana Gunn, Finance Director, *City of Adelanto*
11600 Air Expressway, Adelanto, CA 92301
Phone: (760) 246-2300
dgunn@adelantoca.gov

Laura Gutierrez, City Manager, *City of Calipatria*
125 North Park Avenue, Calipatria, CA 92233
Phone: (760) 348-4141
l_gutierrez@calipatria.com

Joseph Guzman, District Engineer/Water Resource Control Engineer, *State Water Resources Control Board*
Division of Drinking Water, 1350 Front Street, Room 2050, San Diego, CA 92101
Phone: (619) 525-4772
Joseph.Guzman@waterboards.ca.gov

Anna Guzman, Director of Finance, *City of Weed*
550 Main Street, PO Box 470, Weed, CA 96094
Phone: (530) 938-5020
guzman@ci.weed.ca.us

Lani Ha, Finance Manager/Treasurer, *Town of Danville*
510 La Gonda Way, Danville, CA 94526
Phone: (925) 314-3311
lha@danville.ca.gov

Isaiah Hagerman, City Manager, *City of Rancho Mirage*
69825 Highway 111, Rancho Mirage, CA 92270
Phone: (760) 324-4511
isaiahh@ranchomirageca.gov

Andy Hall, City Manager, *City of San Clemente*
910 Calle Negocio, San Clemente, CA 92673

Phone: (949) 361-8341
HallA@san-clemente.org

Nathan Hamburger, City Manager, *City of Agoura Hills*
30001 Ladyface Court, Agoura Hills, CA 91301
Phone: (818) 597-7300
nhamburger@ci.agoura-hills.ca.us

Sunny Han, Director of Finance, *City of Yorba Linda*
4845 Casa Loma Avenue, Yorba Linda, CA 92886
Phone: (714) 961-7140
shan@yorbalindaca.gov

Toni Hannah, Director of Finance, *City of Pacific Grove*
300 Forest Avenue, Pacific Grove, CA 93950
Phone: (831) 648-3100
thannah@cityofpacificgrove.org

Anne Haraksin, Assistant City Manager, *City of La Mirada*
13700 La Mirada Blvd., La Mirada, CA 90638
Phone: N/A
aharaksin@cityoflamirada.org

Sydney Harris, Finance Director, *City of Barstow*
220 East Mountain View Street, Suite A, Barstow, CA 92311
Phone: (760) 255-5125
sharris@barstowca.org

George Harris, Finance Director, *City of Lancaster*
44933 Fern Avenue, Lancaster, CA 93534
Phone: (661) 723-5988
gharris@cityoflanasterca.org

Joel Harrison, Finance Director, *City of Willows*
201 North Lassen Street, Willows, CA 95988
Phone: (530) 934-7041
jharrison@cityofwillows.org

Molly Haviland, City Manager, *Point Arena*
451 School Street, 24000 S. Highway 1, Point Arena, CA 95468
Phone: (707) 882-2122
cm@pointarena.ca.gov

Jim Heller, City Treasurer, *City of Atwater*
Finance Department, 750 Bellevue Rd, Atwater, CA 95301
Phone: (209) 357-6310
finance@atwater.org

Alexander Henderson, City Manager, *City of Kingsburg*
1401 Draper Street, Kingsburg, CA 93631
Phone: (559) 897-5821
ahenderson@cityofkingsburg-ca.gov

Eric Hendrickson, Finance Director, *City of Laguna Hills*
24035 El Toro Road, Laguna Hills, CA 92653
Phone: (949) 707-2623
ehendrickson@lagunahillsca.gov

Jennifer Hennessy, Finance Director, *City of Temecula*
41000 Main St., Temecula, CA 92590
Phone: N/A
Jennifer.Hennessy@cityoftemecula.org

Ernie Hernandez, City Manager, *City of Commerce*
2535 Commerce Way, Commerce, CA 90040
Phone: (323) 722-4805
ehernandez@ci.commerce.ca.us

Erika Herrera-Terriquez, Interim City Manager, *City of Fillmore*
250 Central Avenue, Fillmore, CA 93015
Phone: (805) 524-1500
eherrera@fillmoreca.gov

Robert Hicks, Director of Finance, *City of Berkeley*
2180 Milvia Street, Berkeley, CA 94704
Phone: N/A
finance@ci.berkeley.ca.us

Chris Hill, Principal Program Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, 8th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
Chris.Hill@dof.ca.gov

Ryan Hinchman, Administrative Services Director, *City of Saratoga*
13777 Fruitvale Avenue, Saratoga, CA 94025
Phone: N/A
rhinchman@saratoga.ca.us

Tiffany Hoang, Associate Accounting Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 323-1127
THoang@sco.ca.gov

Jason Holley, City Manager, *City of American Canyon*
4381 Broadway Street, Suite 201, American Canyon, CA 94503
Phone: (707) 647-5323
jholley@cityofamericancanyon.org

Linda Hollinsworth, Finance Director, *City of Hawaiian Gardens*
21815 Pioneer Blvd., Hawaiian Gardens, CA 90716
Phone: (562) 420-2641
lindah@hgcity.org

Christina Holmes, Director of Finance, *City of Escondido*
201 North Broadway, Escondido, CA 92025
Phone: (760) 839-4676
cholmes@escondido.org

Susie Holmes, Finance Director, *City of Cloverdale*
124 N Cloverdale Blvd, Cloverdale, CA 95425
Phone: (707) 894-2521
sholmes@ci.cloverdale.ca.us

Travis Hopkins, City Manager, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648

Phone: (714) 536-5202
THopkins@surfcity-hb.org

Willie Hopkins, City Manager, *City of Compton*
205 S Willowbrook Ave, Compton, CA 90220
Phone: (310) 605-5500
whopkins@comptoncity.org

Ken Howell, Senior Management Auditor, *State Controller's Office*
Audits, Compliance Audits Bureau, 3301 C Street, Suite 725A, Sacramento, CA 95816
Phone: (916) 323-2368
KHowell@sco.ca.gov

Betsy Howze, Finance Director, *City of Rohnert Park*
130 Avram Avenue, Rohnert Park, CA 94928-1180
Phone: (707) 585-6717
bhowze@rpcity.org

Matt Huffaker, City Manager, *City of Santa Cruz*
809 Center Street, Room 10, Santa Cruz, CA 95060
Phone: (831) 420-5010
mhuffaker@santacruzca.gov

Lewis Humphries, Finance Director, *City of Newman*
Finance Department, 938 Fresno Street, Newman, CA 95360
Phone: (209) 862-3725
lhumphries@cityofnewman.com

Megan Hunter, City Manager, *City of Soledad*
248 Main Street, Soledad, CA 93960
Phone: (831) 223-5043
mhunter@cityofsoledad.gov

Chris Huot, Interim City Manager, *City of Paso Robles*
1000 Spring Street, Paso Robles, CA 93446
Phone: (805) 227-7276
citymanager@prcity.com

Scott Hurlbert, City Manager, *City of Wasco*
746 8th Street, Wasco, CA 93280
Phone: (661) 758-7214
schurlbert@cityofwasco.org

Kevin Ingram, City Manager, *City of Lakeport*
225 Park Street, Lakeport, CA 95453
Phone: (707) 263-5615
kingram@cityoflakeport.com

Emily Jackson, Finance Director, *City of San Luis Obispo*
Finance & Information Technology Department, 990 Palm Street, San Luis Obispo, CA 93401
Phone: (805) 781-7125
ejackson@slocity.org

Rachel Jacobs, Finance Director/Treasurer, *City of Solana Beach*
635 South Highway 101, Solana Beach, CA 92075-2215
Phone: (858) 720-2463
rjacobs@cosb.org

Stone James, City Manager, *City of Twentynine Palms*
6136 Adobe Road, Twentynine Palms, CA 92277
Phone: (760) 367-6799
sjames@29palms.org

Chris Jeffers, Interim City Manager, *City of South Gate*
8650 California Ave, South Gate, CA 90280
Phone: (323) 563-9503
cjeffers@sogate.org

Dena Jenkins, Finance Manager, *City of Citrus Heights*
Finance Department, 6237 Fountain Square Dr, Citrus Heights, CA 95621
Phone: (916) 725-2448
Finance@citrusheights.net

Brooke Jenkins, District Attorney, *City and County of San Francisco*
350 Rhode Island Street, North Building, Suite 400N, San Francisco, CA 94103
Phone: (628) 652-4000
districtattorney@sfgov.org

Jason Jennings, Director, *Maximus Consulting*
Financial Services, 808 Moorefield Park Drive, Suite 205, Richmond, VA 23236
Phone: (804) 323-3535
SB90@maximus.com

Heather Jennings, Director of Finance, *City of Santee*
10601 Magnolia Avenue, Building #3, Santee, CA 92071
Phone: (619) 258-4100
hjennings@cityofsantee.ca.gov

Christa Johnson, Town Manager and Finance Director, *Town of Ross*
31 Sir Francis Drake Boulevard, PO Box 320, Ross, CA 94957
Phone: (415) 453-1453
cjohnson@townofross.org

Jestin Johnson, City Administrator, *City of Oakland*
1 Frank H Ogawa Plaza, Oakland, CA 94612
Phone: (510) 238-3301
cityadministratorsoffice@oaklandca.gov

Carolyn Johnson, Director of Administrative Services, *City of Simi Valley*
2929 Tapo Canyon Road, Simi Valley, CA 93063
Phone: (805) 583-6700
admins@simivalley.org

Talika Johnson, Director of Administrative Services, *City of Azusa*
213 E Foothill Blvd, Azusa, CA 91702
Phone: (626) 812-5203
finance@azusaca.gov

Dewayne Jones, City Manager, *City of Dos Palos*
2174 Blossom Street, Dos Palos, CA 93620
Phone: (209) 392-2174
djones@cityofdp.com

Jeff Jones, City Manager, *City of Arvin*
200 Campus Drive, Arvin, CA 93203

Phone: (661) 854-3134
jeffjones@arvin.org

Hamed Jones, Finance Director, *City of Tehachapi*
Finance Department, 115 S. Robinson St., Tehachapi, CA 93561
Phone: (661) 822-2200
hjones@tehachapicityhall.com

Daniel Jordan, City Manager, *City of La Cañada Flintridge*
One Civic Center Drive, La Cañada Flintridge, CA 91011
Phone: (808) 706-1613
Dan@wlv.org

Angelo Joseph, Supervisor, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 323-0706
AJoseph@sco.ca.gov

Sean Joyce, Interim City Manager, *City Of Cypress*
5275 Cypress Ave, Cypress, CA 90630
Phone: (714) 229-6700
sjoyce@cypressca.org

Todd Juhasz, City Manager, *City of Mount Shasta*
305 N. Mt. Shasta Boulevard, Mount Shasta, CA 96067
Phone: (530) 926-7510
tjuhasz@mtshastaca.gov

Emma Jungwirth, Senior Legislative Advocate, *California State Association of Counties (CSAC)*
1100 K Street, Ste 101, Sacramento, CA 95814
Phone: (916) 650-8115
ejungwirth@counties.org

Kim Juran Karageorgiou, Administrative Services Director, *City of Rancho Cordova*
2729 Prospect Park Drive , Rancho Cordova, CA 95670
Phone: (916) 851-8731
kjurancityofranhocordova.org

Will Kaholokula, Finance Director, *City of San Gabriel*
425 South Mission Drive, San Gabriel, CA 91776
Phone: (626) 308-2812
wkaholokula@sgch.org

Kerry Kallman, City Manager, *City of Palos Verdes Estates*
340 Palos Verdes Dr West, Palos Verdes Estates, CA 90274
Phone: (310) 378-0383
kkallman@pvestates.org

Anne Kato, Acting Chief, *State Controller's Office*
Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA
95816
Phone: (916) 322-9891
akato@sco.ca.gov

Dennis Kauffman, Finance Director, *City of Roseville*
311 Vernon Street, Roseville, CA 95678

Phone: (916) 774-5313
dkauffman@roseville.ca.us

Jeff Kay, City Manager, *City of Healdsburg*
401 Grove Street, Healdsburg, CA 95448
Phone: (707) 431-3396
jkay@ci.healdsburg.ca.us

Kevin Kearney, City Manager, *City of Bradbury*
600 Winston Ave, Bradbury, CA 91008
Phone: (626) 358-3218
kkearney@cityofbradbury.org

Mandy Kellogg, Administrative Services Director, *City of St. Helena*
1088 College Avenue, City Hall, St. Helena, CA 94574
Phone: (707) 968-2649
mkellogg@cityofstheleena.gov

Naomi Kelly, City Administrator, *City and County of San Francisco*
City Hall, Room 362, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102
Phone: (415) 554-4851
city.administrator@sfgov.org

Jon Kennedy, Interim City Manager, *City of Isleton*
101 2nd Street, PO Box 716, Isleton, CA 95641
Phone: (916) 777-7770
jon@civassist.com

Anita Kerezsi, Principal Consultant, *AK & Company*
2425 Golden Hill Road, Suite 106, Paso Robles, CA 93446
Phone: (805) 239-7994
akcompanysb90@gmail.com

Marissa Kersey, City Clerk, *City of Woodland*
300 First Street, Woodland, CA 95695
Phone: (530) 661-5830
marissa.kersey@cityofwoodland.gov

Joanne Kessler, Fiscal Specialist, *City of Newport Beach*
Revenue Division, 100 Civic Center Drive , Newport Beach, CA 90266
Phone: (949) 644-3199
jkessler@newportbeachca.gov

Kari Kibler, City Manager, *City of Redding*
777 Cypress Avenue 3rd Floor, Redding, CA 96001
Phone: (530) 225-4060
kkibler@cityofredding.gov

Ben Kim, City Manager, *City of Rosemead*
8838 East Valley Boulevard, Rosemead, CA 91770
Phone: (626) 569-2169
bkim@cityofrosemead.org

Yvonne Kimball, City Manager, *City of Williams*
PO Box 310 , Williams, CA 95987
Phone: (530) 235-3275
ykimball@cityofwilliams.org

Rafaela King, Finance Director, *City of Monterey*
735 Pacific Street, Suite A, Monterey, CA 93940
Phone: (831) 646-3940
King@monterey.org

Kevin King, Deputy City Attorney, *City of San Diego*
City Attorney's Office, Affirmative Civil Enforcement Unit, 1200 Third Avenue, Suite 1100, San Diego, CA 92101
Phone: (619) 533-6103
KBKing@sandiego.gov

Jennifer King, Acting Finance Director, *City of Tustin*
300 Centennial Way, Tustin, CA 92780
Phone: (714) 573-3079
jking@tustinca.org

Tim Kirby, City Manager, *City of Sunnyvale*
456 West Olive Avenue, Sunnyvale, CA 94086
Phone: (408) 730-7911
citymgr@sunnyvale.ca.gov

Kyle Knopp, City Manager, *City of Rio Dell*
675 Wildwood Ave, Rio Dell, CA 95562
Phone: (707) 764-3532
knoppk@cityofriodell.ca.gov

Will Kolbow, City Manager, *City of Calimesa*
908 Park Ave, Calimesa, CA 92320
Phone: (909) 795-9801
wkolbow@calimesa.gov

Zach Korach, Finance Director, *City of Carlsbad*
1635 Faraday Ave., Carlsbad, CA 92008
Phone: (442) 339-2127
zach.korach@carlsbadca.gov

James Krueger, Director of Administrative Services, *City of Coronado*
1825 Strand Way, Coronado, CA 92118
Phone: (619) 522-7309
jkrueger@coronado.ca.us

Janet Kulbeck, Finance Supervisor, *City of Montclair*
5111 Benito Street, Montclair, CA 91763
Phone: (909) 626-8571
jkulbeck@cityofmontclair.org

Lisa Kurokawa, Bureau Chief for Audits, *State Controller's Office*
Compliance Audits Bureau, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 327-3138
lkurokawa@sco.ca.gov

Mali LaGoe, City Manager, *City of Scotts Valley*
1 Civic Center Drive, Scotts Valley, CA 95066
Phone: (831) 440-5600
mlago@scottsvalley.gov

Ramon Lara, City Administrator, *City of Woodlake*
350 N. Valencia Blvd., Woodlake, CA 93286

Phone: (559) 564-8055
rlara@ci.woodlake.ca.us

Nancy Lassey, Finance Administrator, *City of Lake Elsinore*
130 South Main Street, Lake Elsinore, CA 92530
Phone: N/A
nlassey@lake-elsinore.org

Deborah Lauchner, Chief Financial Officer, *City of Santa Rosa*
90 Santa Rosa Avenue, City Hall Annex, 2nd Floor, Santa Rosa, CA 95404
Phone: (707) 543-3140
finance@srcity.org

Michael Lauffer, Chief Counsel, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5183
michael.lauffer@waterboards.ca.gov

Government Law Intake, *Department of Justice*
Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255, Sacramento, CA 94244-2550
Phone: (916) 210-6046
governmentlawintake@doj.ca.gov

Eric Lawyer, Legislative Advocate, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 650-8112
elawyer@counties.org

Kim-Anh Le, Deputy Controller, *County of San Mateo*
555 County Center, 4th Floor, Redwood City, CA 94063
Phone: (650) 599-1104
kle@smcgov.org

Linda Leaver, Finance Director, *City of Crescent City*
377 J Street, Crescent City, CA 95531
Phone: (707) 464-7483
lleaver@crescentcity.org

Kathy LeBlanc, City Clerk, *City of Loyalton*
605 School Street, P.O. Box 128, Loyalton, CA 96118
Phone: (530) 993-6750
ofclerk-cityofloyalton@psln.com

Jason Ledbetter, Town Manager, *Town of Woodside*
2955 Woodside Road, Woodside, CA 94062
Phone: (650) 851-6790
jledbetter@woodsideca.gov

Krysten Lee, Finance Director, *City of Newark*
37101 Newark Blvd, Newark, CA 94560
Phone: (510) 578-4288
krysten.lee@newark.org

William Lee, Chief Deputy District Attorney, *County of San Bernardino District Attorney's Office*
303 W. 3rd Street, San Bernardino, CA 92415-0502
Phone: (909) 382-3800
WLee@sbcda.org

Fernando Lemus, Principal Accountant - Auditor, *County of Los Angeles*
Auditor-Controller's Office, 500 West Temple Street, Room 603, Los Angeles, CA 90012
Phone: (213) 974-0324
flemus@auditor.lacounty.gov

Grace Leung, City Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3001
gleung@newportbeachca.gov

Jim Lewis, City Manager, *City of Atascadero*
Finance Department, 6500 Palma Ave, Atascadero, CA 93422
Phone: (805) 461-7612
jlewis@atascadero.org

Erika Li, Chief Deputy Director, *Department of Finance*
915 L Street, 10th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
erika.li@dof.ca.gov

Midori Lichtwardt, City Manager, *City of Tracy*
333 Civic Center Plaza, Tracy, CA 95376
Phone: (209) 831-6115
cm@cityoftracy.org

Pearl Lieu, Director of Finance, *City of Alhambra*
111 South First Street, Alhambra, CA 91801
Phone: (626) 570-5020
plieu@cityofalhambra.org

Mark Linder, Interim Town Manager, *Town of Portola Valley*
765 Portola Road, Portola Valley, CA 94028
Phone: (650) 851-1700
pvtownmanager@portolavalley.net

Jim Lindley, City Manager, *City of Dixon*
600 East A Street, Dixon, CA 95620
Phone: (707) 678-7000
jlindley@cityofdixonca.gov

Lance Lippincott, City Manager, *City of Shafter*
336 Pacific Ave. , Shafter, CA 93263
Phone: (661) 746-5000
LLippincott@Shafter.com

Dorothy Long, City Treasurer, *City of Alturas*
200 W. North Street, Alturas, CA 96101
Phone: (530) 233-2512
dlong@cityofalturas.us

Robert Lopez, City Manager, *City of Cerritos*
18125 Bloomfield Ave, Cerritos, CA 90703
Phone: (562) 916-1310
ralopez@cerritos.us

Antony Lopez, City Manager, *City of Avenal*
919 Skyline Boulevard, Avenal, CA 93204

Phone: (559) 401-9837
alopez@cityofavenal.us

Kenneth Louie, Chief Counsel , *Department of Finance*
1021 O. Street, Suite 3110, Sacramento, CA 95814
Phone: (916) 322-0971
Kenny.Louie@dof.ca.gov

Brian Loventhal, City Manager, *City of Campbell*
70 North First Street, Campbell, CA 95008
Phone: (408) 866-2100
dianaj@cityofcampbell.com

Suja Lowenthal, City Manager, *City of Lynwood*
11330 Bullis Road, Lynwood, CA 90262
Phone: (310) 603-0220
suja@lynwoodca.gov

Everett Luc, Accounting Administrator I, Specialist, *State Controller's Office*
3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0766
ELuc@sco.ca.gov

Jessaca Lugo, City Manager, *City of Shasta Lake*
4477 Main Street, Shasta Lake, CA 96019
Phone: (530) 275-7400
jlugo@cityofshastalake.org

Elizabeth Luna, Accounting Services Manager, *City of Suisun City*
701 Civic Center Blvd, Suisun City, CA 94585
Phone: (707) 421-7320
eluna@suisun.com

Janet Luzzi, Finance Director, *City of Arcata*
Finance Department, 736 F Street, Arcata, CA 95521
Phone: (707) 822-5951
finance@cityofarcata.org

Christopher Macon, City Manager, *City of Laguna Woods*
24264 El Toro Road, Laguna Woods, CA 92637
Phone: (714) 639-0500
cmacon@cityoflagunawoods.org

Martin Magana, City Manager/Finance Director, *City of Desert Hot Springs*
Finance Department, 65-950 Pierson Blvd, Desert Hot Springs, CA 92240
Phone: (760) 329-6411, Ext.
CityManager@cityofdhs.org

Jill Magee, Program Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
Jill.Magee@csm.ca.gov

Kathy Magenheimer, Acting Accounting/Grants Manager, *City of Marysville*
Administration and Finance Department, 526 C Street, Marysville, CA 95901
Phone: (530) 749-3903
kmagenheimer@marysville.ca.us

Amanda Mager, City Manager, *City of Blue Lake*
111 Greenwood Rd, Blue Lake, CA 95525-0458
Phone: (707) 668-5655
citymanager@bluelake.ca.gov

Jennifer Maguire, City Manager, *City of San Jose*
200 East Santa Clara Street, San Jose, CA 95113
Phone: (408) 535-8111
Jennifer.Maguire@sanjoseca.gov

Susan Mahoney, Finance Director, *City of Wheatland*
111 C St, Wheatland, CA 95692
Phone: (530) 633-2761
smahoney@wheatland.ca.gov

Licette Maldonado, Administrative Services Director, *City of Carpinteria*
5775 Carpinteria Avenue, Carpinteria, CA 93013
Phone: (805) 755-4448
licettem@carpinteriaca.gov

Lisa Malek-Zadeh, Interim Finance Director, *City of Piedmont*
120 Vista Avenue, Piedmont, CA 94611
Phone: (510) 420-3045
lmalekzadeh@Piedmont.ca.gov

Suresh Malkani, Finance Director, *Town of Apple Valley*
14955 Dale Evans Parkway, Apple Valley, CA 92307
Phone: (760) 240-7000
smalkani@applevalley.org

Hrant Manuelian, Director of Finance/City Treasurer, *City of Lawndale*
14717 Burin Avenue, Lawndale, CA 90260
Phone: (310) 973-3200
hmanuelian@lawndalecity.org

Darryl Mar, Manager, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0706
DMar@sco.ca.gov

Terri Marsh, Finance Director, *City of Signal Hill*
Finance, 2175 Cherry Ave., Signal Hill, CA 90755
Phone: (562) 989-7319
Financel@cityofsignalhill.org

Barbara Martin, Administrative Services Director, *City of Chico*
411 Main St., Chico, CA 95927
Phone: (530) 879-7300
barbara.martin@chicoca.gov

Pio Martin, Finance Director, *City of Firebaugh*
Finance Department, 1133 P Street, Firebaugh, CA 93622
Phone: (559) 659-5901
pmartin@firebaugh.org

Alma Martinez, City Manager, *City of El Monte*
11333 Valley Blvd, El Monte, CA 91731-3293

Phone: (626) 580-2274
amartinez@elmonteca.gov

Patrick Martinez, City Manager, *City of Needles*
817 Third Street, Needles, CA 92363
Phone: (760) 326-2113
pmartinez@cityofneedles.com

Ken Matsumiya, Director of Finance, *City of Vacaville*
650 Merchant Street, Vacaville, CA 95688
Phone: (707) 449-5450
Ken.Matsumiya@cityofvacaville.com

Dennice Maxwell, Finance Director, *City of Redding*
Finance Department, 3rd Floor City Hall, 777 Cypress Avenue, Redding, CA 96001
Phone: (530) 225-4079
finance@cityofredding.org

Frederick Mayo, Water Utilities Director, *City of Oceanside*
300 N. Coast Highway, Oceanside, CA 92054
Phone: (760) 435-5827
fmayo@oceansideca.org

Kevin McCarthy, Director of Finance, *City of Indian Wells*
Finance Department, 44-950 Eldorado Drive, Indian Wells, CA 92210-7497
Phone: (760) 346-2489
kmccarthy@indianwells.com

Suzanne McDonald, Financial Operations Manager, *City of Concord*
Finance Department, 1950 Parkside Drive, MS 06 , Concord, CA 94519
Phone: (925) 671-3136
Suzanne.McDonald@cityofconcord.org

Kris McFadden, Deputy Chief Operating Officer, *City of San Diego*
Office of the Chief Operating Officer, 202 C Street, San Diego, CA 92101
Phone: (619) 236-6595
kmcfadden@sandiego.gov

Bridgette McInally, Accounting Manager, *City of Ventura*
Finance and Technology , 501 Poli Street, Ventura, CA 93001
Phone: (805) 654-7812
bmcinally@ci.ventura.ca.us

Randy McKeegan, Finance Director, *City of Bakersfield*
1600 Truxtun Avenue, Bakersfield, CA 93301
Phone: (661) 326-3742
RMcKeegan@bakersfieldcity.us

Jerrid McKenna, Director of Administrative Services, *City of Santa Clarita*
23920 Valencia Blvd, Santa Clarita, CA 91355
Phone: (661) 255-4997
jmckenna@santaclarita.gov

Larry McLaughlin, City Manager, *City of Sebastopol*
7120 Bodega Avenue, P.O. Box 1776, Sebastopol, CA 95472
Phone: (707) 823-1153
lwmclaughlin@juno.com

Jon McMillen, City Manager, *City of La Quinta*
78-495 Calle Tampico, La Quinta, CA 92253
Phone: (760) 777-7030
jmcmillen@laquintaca.gov

Conal McNamara, City Manager, *City of Whittier*
13230 Penn Street, Whittier, CA 90602
Phone: (562) 567-9300
admin@cityofwhittier.org

Paul Melikian, Assistant City Manager, *City of Reedley*
1717 Ninth Street, Reedley, CA 93654
Phone: (559) 637-4200
paul.melikian@reedley.ca.gov

Brittany Mello, Administrative Services Director, *City of Menlo Park*
701 Laurel Street, Menlo Park, CA 94025
Phone: (650) 330-6675
bkmello@menlopark.gov

Erica Melton, Director of Finance / City Treasurer, *City of San Fernando*
117 Macneil Street, San Fernando, CA 91340
Phone: (818) 898-1212
EMelton@sfcity.org

Rebecca Mendenhall, Administrative Services Director, *City of San Carlos*
600 Elm Street, P.O. Box 3009, San Carlos, CA 94070-1309
Phone: (650) 802-4205
rmendenhall@cityofsancarlos.org

Michelle Mendoza, Business Engineer Lead and Senior Manager, *MAXIMUS*
17310 Red Hill Avenue, Suite 340, Irvine, CA 95403
Phone: (949) 440-0845
michellemendoza@maximus.com

Olga Mendoza, Accountant, *City of Ceres*
2220 Magnolia Street, Ceres, CA 95307
Phone: (209) 538-5766
olga.mendoza@ceres.gov

Dawn Merchant, Finance Director, *City of Antioch*
P.O. Box 5007, Antioch, CA 94531
Phone: (925) 779-7055
dmerchant@ci.antioch.ca.us

Brant Mesker, City Manager, *City of Corning*
794 Third Street, Corning, CA 96021
Phone: N/A
bmesker@corning.org

Keith Metzler, City Manager, *City of Victorville*
14343 Civic Drive, PO Box 5001, Victorville, CA 92393-5001
Phone: (760) 955-5029
kmetzler@victorvilleca.gov

John Michicoff, Director of Finance, *City of Downey*
11111 Brookshire Avenue, Downey, CA 90241-7016

Phone: (562) 904-7253
jmichico@downeyca.org

Ron Millard, Finance Director, *City of Vallejo*
Finance Department, 555 Santa Clara Street, 3rd Floor, Vallejo, CA 94590
Phone: (707) 648-4592
alison.hughes@cityofvallejo.net

Kristina Miller, City Manager, *City of Rio Vista*
One Main Street, Rio Vista, CA 94571
Phone: (707) 374-6451
kmiller@ci.rio-vista.ca.us

Leyne Milstein, Interim City Manager, *City of Sacramento*
915 I Street, 5th Floor, Sacramento, CA 98514
Phone: (916) 808-8491
lmilstein@cityofsacramento.org

Manuel Minjares, Assistant City Manager, *City of Fillmore*
250 Central Avenue, Fillmore, CA 93015
Phone: N/A
mminjares@fillmoreca.gov

Clara Miramontes, City Manager, *City of Perris*
101 N. D Street, Perris, CA 92570
Phone: (951) 943-6100
cmiramontes@cityofperris.org

Julian Miranda, City Manager, *City of Irwindale*
5050 N Irwindale Avenue, Irwindale, CA 91706
Phone: (626) 430-2217
jmiranda@irwindaleca.gov

Talyn Mirzakhonian, City Manager, *City of Manhattan Beach*
1400 Highland Ave., Manhattan Beach, CA 90266
Phone: (310) 802-5302
tmirzakhonian@citymb.info

Graham Mitchell, City Manager, *City of El Cajon*
200 Civic Center Way, El Cajon, CA 92020
Phone: (619) 441-1716
citymanager@elcajon.gov

Scott Mitnick, Town Manager, *Town of Moraga*
329 Rheem Boulevard, Moraga, CA 94556
Phone: (925) 888-7020
smitnick@moraga.ca.us

Kevin Mizuno, Finance Director, *City of Clayton*
Finance Department, 600 Heritage Trail, Clayton, CA 94517
Phone: (925) 673-7309
kmizuno@ci.clayton.ca.us

Brian Mohan, Chief Financial Officer, *City of Moreno Valley*
14177 Frederick Street, PO Box 88005, Moreno Valley, CA 92552
Phone: (951) 413-3021
brianm@moval.org

Monica Molina, Finance Manager/Treasurer, *City of Del Mar*
1050 Camino Del Mar, Del Mar, CA 92014
Phone: (858) 755-9354
mmolina@delmar.ca.us

Carol Molina, Interim Finance Director, *City of Lynwood*
11330 Bullis Road, Lynwood, CA 90262
Phone: (310) 603-0220
cmolina@lynwoodca.gov

Rachel Molina, City Manager, *City of Hesperia*
9700 Seventh Ave. , Hesperia, CA 92345
Phone: (760) 947-1018
rmolina@cityofhesperia.us

Gloria Molleda, Interim City Manager, *City of Hidden Hills*
6165 Spring Valley Road, Hidden Hills, CA 91302
Phone: (818) 888-9281
gloria@hiddenhills.gov

Kristopher Mooney, Director of Finance & Treasurer, *City of Palm Springs*
3200 E. Tahquitz Canyon Way, Palm Springs, CA 92262
Phone: (760) 322-8324
Kristopher.Mooney@palmspringsca.gov

Sean Moore, City Manager, *City of Yucaipa*
34272 Yucaipa Blvd, Yucaipa, CA 92399
Phone: (909) 797-2489
smoore@yucaipa.gov

Debbie Moreno, Finance Director, *City of Anaheim*
200 S. Anaheim Boulevard, Anaheim, CA 92805
Phone: (716) 765-5192
DMoreno@anaheim.net

Isaac Moreno, Finance Director, *City of Turlock*
156 South Broadway, Suite 230, Turlock, CA 95380
Phone: (209) 668-6071
IMoreno@turlock.ca.us

Dennis Morita, City Manager, *City of Imperial*
420 South Imperial Ave., Imperial, CA 92251
Phone: (760) 355-4373
dmorita@imperial.ca.gov

Jennifer Morrison, Finance Director, *City of Gustine*
352 5th Street, Gustine, CA 95322
Phone: (209) 854-6471
finance@cityofgustine.com

Jill Moya, Financial Services Director, *City of Oceanside*
300 North Coast Highway, Oceanside, CA 92054
Phone: (760) 435-3887
jmoya@oceansideca.org

Justin Murphy, City Manager, *City of Menlo Park*
701 Laurel Street, Menlo Park, CA 94025

Phone: (650) 330-6725
jicmurphy@menlopark.gov

Bill Mushallo, Finance Director, *City of Petaluma*
Finance Department, 11 English St., Petaluma, CA 94952
Phone: (707) 778-4352
financeemail@ci.petaluma.ca.us

John Nachbar, City Manager, *City of Culver City*
9770 Culver Blvd, Culver City, CA 90232
Phone: (310) 253-6000
john.nachbar@culvercity.org

Renee Nagel, Finance Director, *City of Visalia*
707 W. Acequia Avenue, City Hall West, Visalia, CA 93291
Phone: (559) 713-4375
Renee.Nagel@visalia.city

Tim Nash, Director of Finance, *City of Encinitas*
505 S Vulcan Avenue, Encinitas, CA 92054
Phone: N/A
finmail@encinitasca.gov

Olivia Nashed, City Clerk, *City of Lodi*
City Hall, 221 West Pine Street, Lodi, CA 95241-1910
Phone: (209) 333-6702
cityclerk@lodi.gov

Mansour Nasser, Water and Sewer Division Manager, *City of Sunnyvale*
456 West Olive Avenue, Sunnyvale, CA 94086
Phone: (408) 730-7578
MNasser@sunnyvale.ca.gov

Renee Neermann, Finance Manager, *City of Malibu*
23825 Stuart Ranch Road, Malibu, CA 90265
Phone: (310) 456-2489
RNeermann@malibucity.org

Kaleb Neufeld, Assistant Controller, *City of Fresno*
2600 Fresno Street, Fresno, CA 93721
Phone: (559) 621-2489
Kaleb.Neufeld@fresno.gov

Keith Neves, Director of Finance/City Treasurer, *City of Lake Forest*
Finance Department, 100 Civic Center Drive, Lake Forest, CA 92630
Phone: (949) 461-3430
kneves@lakeforestca.gov

Tim Nevin, Director of Finance and Administrative Services, *City of Daly City*
333 90th Street, Daly City, CA 94015
Phone: (650) 991-8040
tnevin@dalycity.org

Dan Newton, City Manager, *City of Susanville*
66 North Lassen Street, Susanville, CA 96130
Phone: (530) 252-5106
dnewton@cityofsusanville.org

Rosanna Nguyen, Program Budget Manager, *Department of Finance*
Local Government Unit, 915 L. Street, Sacramento, CA 95814
Phone: (916) 445-3274
Rosanna.Nguyen@dof.ca.gov

Dat Nguyen, Finance Director, *City of Morgan Hill*
17575 Peak Avenue, Morgan Hill, CA 95037
Phone: (408) 779-7237
dat.nguyen@morganhill.ca.gov

Trang Nguyen, Director of Finance, *City of Orange*
300 E. Chapman Avenue, Orange, CA 92866-1508
Phone: (714) 744-2230
nguyent@cityoforange.org

Andy Nichols, Consultant, *Nichols Consulting*
1857 44th Street, Sacramento, CA 95819
Phone: (916) 455-3939
andy@nichols-consulting.com

Dale Nielsen, Director of Finance/Treasurer, *City of Vista*
Finance Department, 200 Civic Center Drive, Vista, CA 92084
Phone: (760) 726-1340
dnielsen@ci.vista.ca.us

Amy Nilsen, City Manager, *City of Fortuna*
621 11th Street, Fortuna, CA 95540
Phone: (707) 725-1410
anilsen@ci.fortuna.ca.us

Robert Nisbet, City Manager, *City of Goleta*
130 Cremona Drive, Suite B, Goleta, CA 93117
Phone: (805) 961-7501
misbet@cityofgoleta.org

David Noce, Accounting Division Manager, *City of Santa Clara*
1500 Warburton Ave, Santa Clara, CA 95050
Phone: (408) 615-2341
dnoce@santaclaraca.gov

Vibeke Norgaard, City Manager, *City of Sand City*
1 Pendergrass Way, Sand City, CA 93955
Phone: (831) 394-3054
vibeke@sandcityca.org

Vontray Norris, City Manager Director of Community Services, *City of Hawthorne*
4455 W 126th St, Hawthorne, CA 90250
Phone: (310) 349-2908
vnorris@hawthorneca.gov

Kiely Nose, Interim Director of Administrative Services, *City of Palo Alto*
250 Hamilton Avenue, Palo Alto, CA 94301
Phone: (650) 329-2692
Kiely.Nose@cityofpaloalto.org

Adriana Nunez, Staff Counsel, *State Water Resources Control Board*
Los Angeles Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814

Phone: (916) 322-3313
Adriana.Nunez@waterboards.ca.gov

Damien O'Bid, City Manager, *City of Cotati*
201 W Sierra Avenue, Cotati, CA 94931
Phone: (707) 665-3622
dobid@cotaticity.gov

Michael O'Brien, Administrative Services Director, *City of San Dimas*
245 East Bonita Ave, San Dimas, CA 91773
Phone: (909) 394-6200
mobrien@sandimasca.gov

Michael O'Kelly, Director of Administrative Services, *City of Fullerton*
303 West Commonwealth Avenue, Fullerton, CA 92832
Phone: (714) 738-6803
mokelly@cityoffullerton.com

Jim O'Leary, Finance Director, *City of San Bruno*
567 El Camino Real, San Bruno, CA 94066
Phone: (650) 616-7080
webfinance@sanbruno.ca.gov

Scott Ochoa, City Manager, *City of Ontario*
393 E. B Street, Ontario, CA 91764
Phone: (909) 395-2010
sochoa@ontarioca.gov

Karen Ogawa, Finance Director, *City of West Covina*
1444 West Garvey Street South, West Covina, CA 91790
Phone: (626) 939-8438
kogawa@westcovina.org

Brenda Olwin, Finance Director, *City of East Palo Alto*
2415 University Avenue, East Palo Alto, CA 94303
Phone: (650) 853-3122
financedepartment@cityofepa.org

Erika Opp, Administrative Analyst, *City of St. Helena*
City Clerk, 1480 Main Street, St. Helena, CA 94574
Phone: (707) 968-2743
eopp@cityofstheleena.gov

Eric Oppenheimer, Executive Director, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5615
eric.oppenheimer@waterboards.ca.gov

Mark Orme, City Manager, *City of Eastvale*
12363 Limonite Avenue, Suite 910, Eastvale, CA 91752
Phone: (951) 703-4479
morme@eastvaleca.gov

Cathy Orme, Finance Director, *City of Larkspur*
Finance Department, 400 Magnolia Ave, Larkspur, CA 94939
Phone: (415) 927-5019
cathy.orme@cityoflarkspur.org

Manuel Orozco, Finance Director/City Treasurer, *City of Willits*
111 E. Commercial Street, Willits, CA 95490
Phone: (707) 459-4601
morozco@cityofwillits.org

Jennifer Ott, City Manager, *City of Alameda*
2263 Santa Clara Ave, Room 320, Alameda, CA 94501
Phone: (510) 747-4700
manager@alamedaca.gov

Barbara Pachon, Director of Finance, *City of San Bernardino*
300 N. , San Bernardino, CA 92418
Phone: (909) 384-5242
pachon_ba@ci.san-bernardino.ca.us

Patricia Pacot, Accountant Auditor I, *County of Colusa*
Office of Auditor-Controller, 546 Jay Street, Suite #202 , Colusa, CA 95932
Phone: (530) 458-0424
ppacot@countyofcolusa.org

Arthur Palkowitz, Attorney, *Law Offices of Arthur M. Palkowitz*
12807 Calle de la Siena, San Diego, CA 92130
Phone: (858) 259-1055
law@artpalk.onmicrosoft.com

Raymond Palmucci, Deputy City Attorney, *Office of the San Diego City Attorney*
Claimant Representative
1200 Third Avenue, Suite 1100, San Diego, CA 92101
Phone: (619) 236-7725
rpalmucci@sandiego.gov

Kirsten Pangilinan, Specialist, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 322-2446
KPangilinan@sco.ca.gov

Yamini Pathak, Director of Finance, *City of Industry*
15625 Mayor Dave Way, City of Industry, CA 91744
Phone: (626) 333-2211
ypathak@cityofindustry.org

Luis Patlan, City Manager, *City of Dinuba*
405 E. El Monte Way, Dinuba, CA 93618
Phone: (559) 591-5900
LPatlan@dinuba.ca.gov

Rob Patterson, Town Manager, *Town of Mammoth Lakes*
437 Old Mammoth Road, Mammoth Lakes, CA 93546
Phone: (760) 965-3601
rpatterson@townofmammothlakes.ca.gov

Bill Pattison, Finance Director, *City of Coachella*
1515 Sixth St., Coachella, CA 92236
Phone: (760) 398-3502
bpattison@coachella.org

Virginia Penaloza, City Manager, *City of Huron*
36311 Lassen Avenue, PO Box 339, Huron, CA 93234

Phone: (559) 945-3827
Virginia@cityofhuron.com

Diana Perkins, Interim City Manager, *City of Monte Sereno*
18041 Saratoga-Los Gatos Road, Monte Sereno, CA 95030
Phone: (408) 354-7635
cityclerk@cityofmontesereno.org

David Persselin, Finance Director, *City of Fremont*
3300 Capitol Ave, Fremont, CA 94538
Phone: (510) 494-4790
DPersselin@fremont.gov

Chris Petlock, Director of Finance/Town Treasurer, *Town of Corte Madera*
300 Tamalpais Drive, Corte Madera, CA 94925
Phone: (415) 927-5054
cpetlock@cortemadera.gov

Jim Pia, interim City Manager, *City of Hollister*
375 Fifth Street, Hollister, CA 95023
Phone: (831) 636-4300
COH.Manager@hollister.ca.gov

Johnnie Pina, Legislative Policy Analyst, *League of Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8214
jpina@cacities.org

Steven Pinkerton, City Manager, *City of Mountain House*
251 E. Main Street, Mountain House, CA 95391
Phone: (209) 831-2300
spinkerton@sjgov.org

Adam Pirrie, City Manager and Acting Finance Director, *City of Claremont*
207 Harvard Ave, Claremont, CA 91711
Phone: (909) 399-5456
apirrie@ci.claremont.ca.us

Sheila Poisson, Finance Director, *City of Torrance*
Finance Department, 3031 Torrance Blvd., Torrance, CA 90503
Phone: (310) 618-5850
SPoisson@TorranceCA.Gov

Darrin Polhemus, Deputy Director, *State Water Resources Control Board*
Division of Drinking Water, , ,
Phone: (916) 341-5045
Darrin.Polhemus@waterboards.ca.gov

Neil Polzin, City Treasurer, *City of Covina*
125 East College Street, Covina, CA 91723
Phone: (626) 384-5400
npolzin@covinaca.gov

Brian Ponty, Finance Director, *City of Redwood City*
1017 Middlefield Road, Redwood City, CA 94063
Phone: (650) 780-7300
finance@redwoodcity.org

Jack Ponvanit, Deputy Director of Finance, *City of La Habra*
110 E. La Habra Boulevard, La Habra, CA 90631
Phone: (562) 383-4050
JPonvanit@lahabracal.gov

Diona Pope, Finance Director, *City of Yuba City*
1201 Civic Center Blvd, Yuba City, CA 95993
Phone: (530) 822-4615
dpope@yubacity.net

Vanessa Portillo, Finance Director, *City of Ceres*
2220 Magnolia Street, Ceres, CA 95307
Phone: (209) 538-5757
vanessa.portillo@ceres.gov

Trevor Power, Accounting Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3085
tpower@newportbeachca.gov

Rajneil Prasad, Deputy Finance Director, *City of Napa*
955 School Street, PO Box 660, Napa, CA 94559
Phone: (707) 257-9510
rprasad@cityofnapa.org

Mark Prestwich, City Manager, *City of Hemet*
445 East Florida Avenue, Hemet, CA 92543
Phone: (951) 765-2301
mprestwich@hemetca.gov

Tom Prill, Finance Director, *City of San Jacinto*
Finance Department, 595 S. San Jacinto Ave., Building B, San Jacinto, CA 92583
Phone: (951) 487-7340
tprill@sanjacintoca.gov

Rod Pruett, City Administrator, *City of Chowchilla*
130 South 2nd Street, Chowchilla, CA 93610
Phone: (559) 665-8615
RPruett@cityofchowchilla.org

Laura Pruneda, Finance Director, *City of Marina*
211 Hillcrest Avenue, Marina, CA 93933
Phone: (831) 884-1221
lpruneda@cityofmarina.org

Mubeen Qader, Acting Director of Finance, *City of Richmond*
450 Civic Center Plaza, Richmond, CA 94804
Phone: (510) 620-2077
Mubeen_Qader@ci.richmond.ca.us

Jonathan Quan, Associate Accountant, *County of San Diego*
Projects, Revenue, and Grants Accounting, 5530 Overland Ave, Suite 410, San Diego, CA 92123
Phone: 6198768518
Jonathan.Quan@sdcounty.ca.gov

Frank Quintero, City Manager, *City of Merced*
678 West 18th Street, Merced, CA 95340

Phone: N/A
quinterof@cityofmerced.org

Sean Rabe, City Manager, *City of Auburn*
1225 Lincoln Way, Auburn, CA 95603
Phone: (530) 823-4211
srabe@auburn.ca.gov

Jerry Ramar, Interim City Manager, *City of Oakdale*
280 N. Third Avenue, Oakdale, CA 95361
Phone: (209) 845-3571
jramar@oakdaleca.gov

Claudia Ramirez, Junior Accountant, *City of Montclair*
5111 Benito Street, Montclair, CA 91763
Phone: (909) 626-8571
cramirez@cityofmontclair.org

Vina Ramos, Finance Director, *City of Rancho Palos Verdes*
30940 Hawthorne Blvd., Rancho Palos Verdes, CA 90275
Phone: (310) 544-5278
vramos@rpvca.gov

Derek Rampone, Finance and Administrative Services Director, *City of Mountain View*
500 Castro Street, Mountain View, CA 94041
Phone: (650) 903-6316
Derek.Rampone@mountainview.gov

James Ramsey, Finance Director, *City of Live Oak*
Finance, 9955 Live Oak Blvd, Live Oak, CA 95953
Phone: (530) 695-2112
jramsey@liveoakcity.org

Paul Rankin, Finance Director, *City of Orinda*
22 Orinda Way, Second Floor, Orinda, CA 94563
Phone: (925) 253-4224
prankin@cityoforinda.org

Roberta Raper, Director of Finance, *City of West Sacramento*
1110 West Capitol Ave, West Sacramento, CA 95691
Phone: (916) 617-4509
robertar@cityofwestsacramento.org

Brad Raulston, Town Manager, *Town of Yountville*
6550 Yount Street, Yountville, CA 94599
Phone: (707) 944-8851
braulston@yville.com

Crystal Reams, Finance Director, *City of El Cerrito*
10890 San Pablo Ave, El Cerrito, CA 95430-2392
Phone: (510) 215-4335
creams@ci.el-cerrito.ca.us

Kelly Reenders, City Manager, *City of Dana Point*
33282 Golden Lantern, Dana Point, CA 92629-1805
Phone: (949) 248-3554
kreenders@danapoint.org

Linda Reich, City Manager, *City of Chino*
13220 Central Avenue, Chino, CA 91710
Phone: (909) 334-3304
lreich@cityofchino.org

Mike Reid, Interim City Manager, *City of Fowler*
2035 Tulare Street Suite 201, Fresno, CA 93721
Phone: (559) 834-3113
mreid@ci.fowler.ca.us

Ricardo Reyes, City Manager, *City of Huntington Park*
6550 Miles Ave, Huntington Park, CA 90255
Phone: (323) 584-6223
rreyes@hpca.gov

Jose Reynoso, City Manager, *City of Sierra Madre*
232 W. Sierra Madre Blvd, Sierra Madre, CA 91024
Phone: (626) 355-7135
jreynoso@sierramadreca.gov

Terry Rhodes, Accounting Manager, *City of Wildomar*
23873 Clinton Keith Rd., Suite 201, Wildomar, CA 92595
Phone: (951) 677-7751
trhodes@cityofwildomar.org

Marie Ricci, Administrative Services Director/City Treasurer, *City of Glendora*
116 East Foothill Road, Glendora, CA 91741-3380
Phone: (626) 914-8245
mricci@cityofglendora.org

David Rice, Staff Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 341-5161
david.rice@waterboards.ca.gov

Jennifer Riedeman, Director of Finance, *City of Patterson*
1 Plaza Circle, Patterson, CA 95363
Phone: (209) 895-8046
jriedeman@ci.patterson.ca.us

Dustin Rief, City Manager, *City of Dunsmuir*
5915 Dunsmuir Ave, Dunsmuir, CA 96025
Phone: (530) 235-4822
citymanager@ci.dunsmuir.ca.us

Jessica Riley, Finance Director, *City of Seaside*
440 Harcourt Ave., Seaside, CA
Phone: (831) 899-6716
jriley@ci.seaside.ca.us

Chad Rinde, Director of Finance, *County of Sacramento*
700 H Street, Room 3650, Sacramento, CA 95814
Phone: (916) 874-7248
RindeC@SacCounty.gov

Brian Ring, City Administrator, *City of Oroville*
Office of the City Administrator, 1735 Montgomery Street, Oroville, CA 95965

Phone: (530) 538-2535
bring@cityoforoville.org

Rosa Rios, Finance Director, *City of Delano*
1015 11th Ave., Delano, CA 93216
Phone: N/A
rrios@cityofdelano.org

Luke Rioux, Finance Director, *City of Goleta*
130 Cremona Drive, Suite B, Goleta, CA 93117
Phone: (805) 961-7500
Lrioux@cityofgoleta.org

David Roberts, City Manager, *City of Carson*
701 E. Carson St, Carson, CA 90745
Phone: (310) 952-1730
DRoberts@carsonca.gov

Mark Roberts, Director of Finance, *City of Salinas*
200 Lincoln Ave, Salinas, CA 93901
Phone: (831) 758-7211
Dof@ci.salinas.ca.us

Jackie Rocco, City Manager, *City of West Hollywood*
8300 Santa Monica Blvd., West Hollywood, CA 90069
Phone: (323) 848-6400
citymanagerwebemailaddress@weho.org

Rob Rockwell, Director of Finance, *City of Indio*
Finance Department, 100 Civic Center Mall, Indio, CA 92201
Phone: (760) 391-4029
rockwell@indio.org

George Rodericks, City Manager, *Town of Atherton*
91 Ashfield Road, Atherton, CA 94027
Phone: (650) 752-0504
grodericks@ci.atherton.ca.us

Paul Rodrigues, Director of Finance, *City of Pittsburg*
65 Civic Avenue, Pittsburg, CA 94565
Phone: (925) 252-4848
prodriques@pittsburgca.gov

Janie Rodriguez, Finance Director, *City of Porterville*
291 North Main Street, Porterville, CA 93257
Phone: (559) 782-7566
jrodriguez@ci.porterville.ca.us

Arnoldo Rodriguez, City Manager, *City of Madera*
205 W 4th Street, Madera, CA 93637
Phone: (559) 661-5402
arodriguez@madera.gov

Lydia Romero, City Manager, *City of Lemon Grove*
3232 Main Street, Lemon Grove, CA 91945
Phone: (619) 825-3819
lromero@lemongrove.ca.gov

Dominique Romo, City Manager, *City of Hughson*
Hughson City Hall, P.O. Box 9, Hughson, CA 95326
Phone: (209) 883-4054
dromo@hughson.org

Benjamin Rosenfield, City Controller, *City and County of San Francisco*
1 Dr. Carlton B. Goodlett Place, Room 316, San Francisco, CA 94102
Phone: (415) 554-7500
ben.rosenfield@sfgov.org

Hilary Roverud, Interim City Manager, *City of South Lake Tahoe*
1901 Lisa Maloff Way, South Lake Tahoe, CA 96150
Phone: (530) 542-6024
hroverud@cityofslt.gov

Tammi Royales, Director of Finance, *City of La Mesa*
8130 Allison Avenue, PO Box 937, La Mesa, CA 91944-0937
Phone: (619) 463-6611
findir@cityoflamesa.us

Micah Runner, City Manager, *City of Rancho Cordova*
2729 Prospect Park Drive, Rancho Cordova, CA 95670
Phone: (916) 851-8700
mrunner@cityofranchocordova.org

Cynthia Russell, Chief Financial Officer/City Treasurer, *City of San Juan Capistrano*
Finance Department, 32400 Paseo Adelanto, San Juan Capistrano, CA 92675
Phone: (949) 443-6343
crussell@sanjuancapistrano.org

Jim Sadro, City Manager, *City of La Habra*
110 E. La Habra Blvd., La Habra, CA 90631
Phone: (562) 383-4474
jsadro@lahabraca.gov

Rene Salas, City Manager, *City of South El Monte*
1415 Santa Anita Avenue, South El Monte, CA 91733
Phone: (626) 579-6540
rsalas@soelmonte.org

Stephen Salvatore, City Manager, *City of Lathrop*
Lathrop City Hall, 390 Towne Center Drive, Lathrop, CA 95330
Phone: (209) 941-7220
ssalvatore@ci.lathrop.ca.us

Janelle Samson, Director of Finance, *City of Palmdale*
38300 Sierra Highway, Suite D, Palmdale, CA 93550
Phone: (661) 267-5440
jsamson@cityofpalmdale.org

Tony Sandhu, Interim Finance Director, *City of Capitola*
Finance Department, 480 Capitola Ave, Capitola, CA 95010
Phone: (831) 475-7300
tsandhu@ci.capitola.ca.us

Sage Sangiacomo, City Manager, *City of Ukiah*
300 Seminary Avenue, Ukiah, CA 95482

Phone: (707) 463-6217
ssangiacomo@cityofukiah.com

Jessica Sankus, Senior Legislative Analyst, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
jsankus@counties.org

Fernando Santillan, City Manager, *City of Selma*
1710 Tucker Street, Selma, CA 93662
Phone: (559) 891-2200
FernandoS@CityofSelma.com

Kim Sao, Director of Finance, *City of Chino*
13220 Central Avenue, Chino, CA 91710
Phone: (909) 334-3262
ksao@cityofchino.org

Will Sargent, Finance Director, *City of Tulelake*
591 Main Street, Tulelake, CA 96134
Phone: (530) 667-5522
info@cityoftulelake.com

Lori Sassoon, City Manager, *City of Norco*
2870 Clark Avenue, Norco, CA 92860
Phone: (951) 270-5617
LSassoon@ci.norco.ca.us

Jay Schengel, Finance Director/City Treasurer, *City of Clovis*
1033 5th Street, Clovis, CA 93612
Phone: (559) 324-2113
jays@ci.clovis.ca.us

Craig Schmollinger, Director of Finance, *City of Poway*
13325 Civic Center Drive, Poway, CA 92064
Phone: (858) 668-4411
cshmollinger@poway.org

Sarah Schoen, Director of Finance, *City of Chula Vista*
276 Fourth Avenue, Chula Vista, CA 91910
Phone: (619) 691-5117
sschoen@chulavistaca.gov

Reina Schwartz, Director of Finance/City Treasurer, *City of Albany*
1000 San Pablo Avenue, Albany, CA 947061
Phone: (510) 528-5730
rschwartz@albanyca.org

Cindy Sconce, Director, *Government Consulting Partners*
5016 Brower Court, Granite Bay, CA 95746
Phone: (916) 276-8807
cindysconcegcp@gmail.com

Anita Scott, City Manager, *City of Pomona*
505 South Garey Ave, Pomona, CA 91766
Phone: (909) 620-2051
Anita.Scott@pomonaca.gov

Kelly Sessions, Director of Administrative Services, *City of San Ramon*
Finance Department, 7000 Bollinger Canyon Road, Building #2, San Ramon, CA 94583
Phone: (925) 973-2500
ksessions@sanpabloca.gov

Terry Shea, Finance Director, *City of Canyon Lake*
31516 Railroad Canyon Road, Canyon Lake, CA 92584
Phone: (951) 244-2955
terry@ramscpa.net

Carla Shelton, Senior Legal Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
carla.shelton@csm.ca.gov

Camille Shelton, Chief Legal Counsel, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
camille.shelton@csm.ca.gov

Mark Siegfried, Accounting Manager/Controller, *City of South Pasadena*
1414 Mission Street, South Pasadena, CA 01030
Phone: (626) 403-7250
FinanceDepartment@southpasadenaca.gov

Chet Simmons, City Manager, *City of Los Alamitos*
3191 Katella Ave., Los Alamitos, CA 90720
Phone: (562) 431-3538
csimmons@cityoflosalamitos.org

Dan Singer, City Manager, *City of Santa Paula*
970 Ventura Street, Santa Paula, CA 96061
Phone: (805) 933-4225
dsinger@spcity.org

Ryan Smith, Director of Finance, *City of Fountain Valley*
10200 Slater Avenue, Fountain Valley, CA 92708
Phone: (714) 593-4501
Ryan.Smith@fountainvalley.org

Eugene Solomon, City Treasurer, *City of Redondo Beach*
415 Diamond Street, Redondo Beach, CA 90277
Phone: (310) 318-0657
eugene.solomon@redondo.org

Michael Solorza, Director of Finance, *City of Montebello*
1600 W. Beverly Blvd., Montebello, CA 90640
Phone: (323) 887-1448
msolorza@montebelloca.gov

Greg Sparks, City Manager, *City of Eureka*
531 K Street, Eureka, CA 95501
Phone: (707) 441-4144
cityclerk@ci.eureka.ca.gov

Niroop Srivatsa, City Manager, *City of Lafayette*
3675 Mount Diablo Blvd., #210, Lafayette, CA 94549

Phone: (925) 284-1968
nsrivatsa@lovelafayette.org

Kelly Stachowicz, Assistant City Manager, *City of Davis*
23 Russell Blvd, Davis, CA 95616
Phone: (560) 757-5602
kstachowicz@cityofdavis.org

Justin Stanek, Deputy City Attorney, *City of San Diego*
Civil Advisory Division, 1200 Third Avenue, Suite 1100, San Diego, CA 92101-4100
Phone: (619) 533-5800
jstanek@sandiego.gov

Paul Steenhausen, Principal Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, , Sacramento, CA 95814
Phone: (916) 319-8303
Paul.Steenhausen@lao.ca.gov

Carolyn Steffan, City Administrator, *City of Tehama*
P.O. Box 70, Tehama, CA 96090
Phone: (530) 384-1501
cityhall@cityoftehama.us

Katherine Stevens, Director of Finance, *City of Rialto*
150 South Palm Avenue, Rialto, CA 92376
Phone: (909) 421-7242
kstevens@rialtoca.gov

Jana Stuard, Finance Director, *City of Norwalk*
12700 Norwalk Blvd, Norwalk, CA 90650
Phone: (562) 929-5748
jstuard@norwalkca.gov

Lauren Sugayan, Acting Finance Director, *City of Martinez*
525 Henrietta Street, Martinez, CA 94553
Phone: (925) 372-3579
lsugayan@cityofmartinez.org

Erik Sund, City Manager, *City of Big Bear Lake*
39707 Big Bear Blvd., PO BOX 10000, Big Bear Lake, CA 92315
Phone: (909) 866-5832
esund@citybigbearlake.com

Mike Sung, Director of Finance, *City of Millbrae*
621 Magnolia Avenue, Millbrae, CA 94030
Phone: (259) 259-2433
msung@ci.millbrae.ca.us

Brandon Swanson, City Administrator, *City of Carmel by the Sea*
P.O. Box CC, Carmel-by-the-Sea, CA 93921
Phone: (831) 620-2024
bswanson@ci.carmel.ca.us

Suzanne Sweitzer, Director of Administrative Services, *Town of Tiburon*
1505 Tiburon Boulevard, Tiburon, CA 94920
Phone: (415) 435-7373
ssweitzer@townoftiburon.org

Matthew Szabo, City Administrative Officer, *City of Los Angeles*
200 N. Main St. Suite 1500, Los Angeles, CA 90012-4137
Phone: (213) 473-7500
Matt.Szabo@lacity.org

Tatiana Szerwinski, Assistant Director of Finance, *City of Beverly Hills*
455 North Rexford Drive, Beverly Hills, CA 90210
Phone: (310) 285-2411
tszerwinski@beverlyhills.org

Rose Tam, Finance Director, *City of Baldwin Park*
14403 East Pacific Avenue, Baldwin Park, CA 91706
Phone: (626) 960-4011
rtam@baldwinpark.com

Stacey Tamagni, Director of Finance / CFO, *City of Folsom*
50 Natoma Street, Folsom, CA 95630
Phone: (916) 461-6712
stamagni@folsom.ca.us

Patrick Tang, Interim City Manager, *City of Hercules*
111 Civic Drive, Hercules, CA 94547
Phone: (510) 799-8216
ptang@herculesca.gov

Christopher Tavarez, Finance Director, *City of Hanford*
315 North Douty Street, Hanford, CA 93230
Phone: (559) 585-2500
ctavarez@cityofhanfordca.com

Jeri Tejada, Human Resources Director/Acting Finance Director, *City of Oakley*
3231 Main Street, Oakley, CA 94561
Phone: (925) 625-7010
tejeda@ci.oakley.ca.us

Julie Testa, Vice Mayor, *City of Pleasanton*
123 Main Street PO Box 520, Pleasanton, CA 94566
Phone: (925) 872-6517
Jtesta@cityofpleasantonca.gov

T. Jarb Thaipe Jr., City Manager, *City of Loma Linda*
25541 Barton Road, Loma Linda, CA 92354
Phone: (909) 799-2810
JThaipejr@lomalinda-ca.gov

Sokniorn Than, City Manager, *City of Los Banos*
520 J Street, Los Banos, CA 93635
Phone: (209) 827-2440
niorn.than@losbanos.org

Olga Tikhomirova, Finance Director, *City of South Lake Tahoe*
1901 Lisa Maloff Way, Suite 210, South Lake Tahoe, CA 96150
Phone: (530) 542-7431
otikhomirova@cityofslt.us

Donna Timmerman, Financial Manager, *City of Ferndale*
Finance Department, 834 Main Street, Ferndale, CA 95535

Phone: (707) 786-4224
finance@ci.ferndale.ca.us

Jolene Tollenaar, Consultant, *MGT Consulting Group*
2251 Harvard Street, Suite 134, Sacramento, CA 95815
Phone: (916) 243-8913
jolenetollenaar@gmail.com

Joseph Toney, Interim Director of Finance, *City of Big Bear Lake*
39707 Big Bear Blvd, Big Bear Lake, CA 92315
Phone: (909) 866-5831
finance@citybigbearlake.com

Robert Torrez, Interim Chief Financial Officer, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5630
robert.torrez@surfcity-hb.org

Marissa Trejo, City Manager, *City of Lemoore*
711 W. Cinnamon Drive, Lemoore, CA 93245
Phone: (559) 924-6744
citymanager@lemoore.com

Colleen Tribby, Finance Director, *City of Dublin*
100 Civic Plaza, Dublin, CA 94568
Phone: (925) 833-6640
colleen.tribby@dublin.ca.gov

Alex Trinidad, Acting Executive Director and City Treasurer, *City of Santa Ana*
20 Civic Center Plaza, Santa Ana, CA 92701
Phone: (714) 647-5295
atrinidad@santa-ana.org

Jeff Tschudi, Finance Director, *City of Benicia*
250 East L Street, Benicia, CA 94510
Phone: (707) 746-4225
JTschudi@ci.benicia.ca.us

Stefanie Turner, Finance Director, *City of Rancho Santa Margarita*
Finance Department, 22112 El Paseo, Rancho Santa Margarita, CA 92688
Phone: (949) 635-1808
sturner@cityofrsm.org

Mark Uribe, Finance Director, *City of Camarillo*
601 Carmen Drive, Camarillo, CA 93010
Phone: (805) 388-5320
muribe@cityofcamarillo.org

Tameka Usher, Director of Administrative Services, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 625-5050
tameka.usher@rocklin.ca.us

Jessica Uzarski, Consultant, *Senate Budget and Fiscal Review Committee*
1020 N Street, Room 502, Sacramento, CA 95814
Phone: (916) 651-4103
Jessica.Uzarski@sen.ca.gov

Nicole Valentine, Interim Director of Administrative Services, *City of Arroyo Grande*
300 E. Branch Street, Arroyo Grande, CA 93420
Phone: (804) 473-5410
nvalentine@arroyogrande.org

James Vanderpool, City Manager, *City of Anaheim*
200 S. Anaheim Blvd. Ste. 733, Anaheim, CA 92805
Phone: (714) 765-5162
CityManager@anaheim.net

Jennifer Vasquez, City Manager, *City of Maywood*
4319 E. Slausen Avenue, Maywood, CA 90270
Phone: (323) 562-5700
jennifer.vasquez@cityofmaywood.org

Abby Vesser, Finance Director, *City of San Mateo*
330 West 20th Avenue, San Mateo, CA 94403
Phone: (650) 522-7102
aveeser@cityofsanmateo.org

Andrew Vialpando, City Manager, *City of Lomita*
24300 Narbonne Ave., Lomita, CA 90717
Phone: (310) 325-7110
a.vialpando@lomitacity.com

Armando Villa, City Manager, *City of Menifee*
29844 Haun Road, Menifee, CA 92586
Phone: (951) 672-6777
avilla@cityofmenifee.us

Brian Villalobos, City Manager, *City of Duarte*
1600 Huntington Drive, Duarte, CA 91010
Phone: (626) 357-7931
bvillalobos@accessduarte.com

Alejandra Villalobos, Management Services Manager, *County of San Bernardino*
Office of Auditor-Controller, 222 West Hospitality Lane, Forth Floor, San Bernardino, CA 92415
Phone: (909) 382-3191
alejandra.villalobos@sbccountyatc.gov

Diego Viramontes, City Manager, *City of McFarland*
401 W. Kern Avenue, McFarland, CA 93250
Phone: (661) 792-3091
dviramontes@mcfarlandcity.org

Nawel Voelker, Acting Director of Finance (Management Analyst), *City of Belmont*
Finance Department, One Twin Pines Lane, Belmont, CA 94002
Phone: (650) 595-7433
nvoelker@belmont.gov

Silvia Vonderlinden, Town Administrator, *Town of Fort Jones*
11960 East Street, P.O. Box 40, Fort Jones, CA 96032
Phone: (530) 468-2281
silvia.vonderlinden@fortjonesca.com

Cliff Wagner, Interim City Administrator, *City of Biggs*
465 C Street, PO Box 307, Biggs, CA 95917

Phone: (530) 868-0100
cliff.wagner@biggs-ca.gov

Ron Walker, City Manager, *City of Colfax*
33 South Main St, Colfax, CA 95713
Phone: (530) 346-2313
city.manager@colfax-ca.gov

Brandon Walker, Administrative Services Director, *City of Hermosa Beach*
1315 Valley Drive, Hermosa Beach, CA 90254
Phone: (310) 318-0225
bwalker@hermosabeach.gov

Tiffany Walston, County Counsel, *County of Los Angeles*
648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, CA 90012-2713
Phone: (213) 974-1811
twalston@counsel.lacounty.gov

Dave Warren, Director of Finance, *City of Placerville*
Finance Department, 3101 Center Street, Placerville, CA 95667
Phone: (530) 642-5223
dwarren@cityofplacerville.org

Gary Watahira, Administrative Services Director, *City of Sanger*
1700 7th Street, Sanger, CA 93657
Phone: (559) 876-6300
gwatahira@ci.sanger.ca.us

Tom Weiner, City Manager, *City of Walnut*
21201 La Puente Rd. , Walnut, CA 91789
Phone: (909) 595-7543
tweiner@walnutca.gov

Renee Wellhouse, President, *David Wellhouse & Associates, Inc.*
3609 Bradshaw Road, H-382, Sacramento, CA 95927
Phone: (916) 797-4883
dwa-renee@surewest.net

Nick Wells, City Manager, *City of Holtville*
121 W 5th Street, Holtville, CA 92250
Phone: (760) 356-2912
NWells@Holtville.ca.gov

Kevin Werner, City Administrator, *City of Ripon*
Administrative Staff, 259 N. Wilma Avenue, Ripon, CA 95366
Phone: (209) 599-2108
kwerner@cityofripon.org

Tom Westbrook, City Manager, *City of Red Bluff*
555 Washington Street , Red Bluff, CA 96080
Phone: (530) 527-2605
twestbrook@cityoffredbluff.org

Cindy Wheeler, Finance Director, *City of Anderson*
1887 Howard Street, Anderson , CA 96007
Phone: (530) 378-6626
cwheeler@ci.anderson.ca.us

Adam Whelen, Director of Public Works, *City of Anderson*
1887 Howard St., Anderson, CA 96007
Phone: (530) 378-6640
awhelen@ci.anderson.ca.us

Nicholas Whipps, Deputy City Attorney, *City and County of San Francisco*
1390 Market Street, Suite , San Francisco, CA
Phone: (415) 554-3812
nicholas.whipps@sfcityatty.org

Isaac Whippy, City Manager, *City of Fort Bragg*
416 N Franklin Street, Fort Bragg, CA 94537
Phone: (707) 961-2825
IWhippy@fortbragg.com

Michael Whitehead, Administrative Services Director & City Treasurer, *City of Rolling Hills Estates*
Administrative Services, 4045 Palos Verdes Drive North, Rolling Hills Estates, CA 90274
Phone: (310) 377-1577
MikeW@RollingHillsEstatesCA.gov

Chris Woizik, Finance Director, *City of Avalon*
Finance Department, 410 Avalon Canyon Rd., Avalon, CA 90704
Phone: (310) 510-0220
Scampbell@cityofavalon.com

Yuri Won, Attorney, Office of Chief Counsel, *State Water Resources Control Board*
San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 327-4439
Yuri.Won@waterboards.ca.gov

Paul Wood, Interim City Manager, *City of Greenfield*
599 El Camino Real, Greenfield, CA 93927
Phone: 8316745591
pwood@ci.greenfield.ca.us

Rafferty Wooldridge, City Manager, *City of La Habra Heights*
1245 N. Hacienda Road, La Habra Heights, CA 90631
Phone: (562) 694-6302
rwooldridge@lhcity.org

Nita Wracker, Finance Director, *City of Lincoln*
600 6th Street, Lincoln, CA 95648
Phone: (916) 434-2490
nita.wracker@lincolnca.gov

Jane Wright, Finance Manager, *City of Ione*
Finance Department, 1 East Main Street , PO Box 398, Ione, CA 95640
Phone: (209) 274-2412
JWright@ione-ca.com

Carrie Wright, City Manager, *City of Nevada City*
317 Broad Street, Nevada City, CA 95959
Phone: (530) 265-2496
carrie.wright@nevadacityca.gov

Arthur Wylene, General Counsel, *Rural County Representatives of California (RCRC)*
1215 K Street, Suite 1650, Sacramento, CA 95814
Phone: (916) 447-4806
awylene@rcrcnet.org

Joanna Wynant, City Administrator, *City of Dorris*
307 S Main Street, Dorris, CA 96023
Phone: (530) 397-3511
cityofdorris@gmail.com

Elisa Wynne, Staff Director, *Senate Budget & Fiscal Review Committee*
California State Senate, State Capitol Room 5019, Sacramento, CA 95814
Phone: (916) 651-4103
elisa.wynne@sen.ca.gov

Curtis Yakimow, Town Manager, *Town of Yucca Valley*
57090 Twentynine Palms Highway, Yucca Valley, CA 92284
Phone: (760) 369-7207
townmanager@yucca-valley.org

Kaily Yap, Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-3274
Kaily.Yap@dof.ca.gov

Siew-Chin Yeong, Director of Public Works, *City of Pleasanton*
3333 Busch Road, Pleasanton, CA 94566
Phone: (925) 931-5506
syeong@cityofpleasantonca.gov

Bobby Young, Finance Director, *City of Costa Mesa*
77 Fair Drive, Costa Mesa, CA 92626
Phone: N/A
Bobby.Young@costamesaca.gov

Kelcey Young, City Manager, *City of Pinole*
2131 Pear Street, Pinole, CA 94564
Phone: (510) 724-8933
kelcey.young@pinole.gov

Traci Young, IS Project Director, *City and County of San Francisco*
San Francisco Public Utilities Commission (SFPUC), 525 Golden Gate Ave, San Francisco, CA 94102
Phone: (415) 653-2583
tmyoung@sflower.org

Stephanie Yu, Assistant Chief Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, Sacramento, CA 95814
Phone: (916) 341-5157
stephanie.yu@waterboards.ca.gov

Michael Yuen, Finance Director, *City of San Leandro*
835 East 14th St., San Leandro, CA 94577
Phone: (510) 577-3376
myuen@sanleandro.org

Robert Zadnick, City Manager, *City of Belvedere*
450 San Rafael Avenue, Belvedere, CA 94920

Phone: (415) 435-8906
rzadnik@cityofbelvedere.org

Luis Zamora, Confidential Executive Assistant to the City Attorney, *City and County of San Francisco*

Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102
Phone: (415) 554-4748
Luis.A.Zamora@sfcityatty.org

Shannel Zamora, Finance Director, *City of Buellton*
107 West Highway 246, PO Box 1819, Buellton, CA 93427
Phone: (805) 688-5177
shannelz@cityofbuellton.com

Chris Zapata, City Manager, *City of Sausalito*
420 Litho Street, Sausalito, CA 94965
Phone: (415) 289-4102
czapata@sausalito.gov

Thomas Zeleny, Chief Deputy County Counsel, *County of Napa*
Office of Napa County Counsel, 1195 Third Street, Suite 301, Napa, CA 94559
Phone: (707) 253-4521
thomas.zeleny@countyofnapa.org

Nicole Zieba, City Manager, *City of Reedley*
1717 Ninth Street, Reedley, CA 93654
Phone: (559) 637-4200
nicole.zieba@reedley.ca.gov

Aly Zimmermann, City Manager, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 625-5585
alyz@rocklin.ca.us

Helmholt Zinser-Watkins, Associate Governmental Program Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 700,
Sacramento, CA 95816
Phone: (916) 324-7876
HZinser-watkins@sco.ca.gov

Jeffery Zuba, Finance and Administrative Services Director, *Town of San Anselmo*
525 San Anselmo Ave, San Anselmo, CA 94960
Phone: (415) 258-4600
jzuba@townofsananselmo.org