



Sacramento County District Attorney's Office

THIEN HO
District Attorney

February 9, 2026

Commission on State Mandates
980 9th Street, Suite 300
Sacramento, CA 95814

Re: Written Comments on Draft Proposed Decision – Custody of Minors – Child Abduction and Recovery Program

Incorrect Reduction Claim: No. 24-4237-I-04
Fiscal Years 2016–2017, 2017–2018, and 2018–2019

Director Gmur and Commission Members:

On behalf of the Sacramento County District Attorney's Office, we respectfully submit these comments in response to the Draft Proposed Decision issued on January 30, 2026, regarding the above-referenced Incorrect Reduction Claim.

The Sacramento County District Attorney's Office agrees with staff's conclusion that the Controller's reduction of \$32,276 in salaries and benefits associated with "good cause" cases was incorrect as a matter of law. As set forth in the Draft Proposed Decision, activities performed by district attorney offices pursuant to Family Code sections 3130 and 3131 require active assistance in resolving child custody and visitation matters, including the enforcement of custody and visitation orders through appropriate civil or criminal proceedings, up to the point of a defendant's first appearance in court for offenses defined in Penal Code sections 278 or 278.5. The Draft Proposed Decision correctly recognizes that Penal Code section 278.7 does not impose separate or distinct state-mandated activities, but instead defines and contextualizes the scope of the existing mandate. Accordingly, staff's recommendation to reinstate these costs is consistent with the Parameters and Guidelines and supported by the record.

With respect to the disallowance of shared costs, the Sacramento County District Attorney's Office respectfully acknowledges the framework applied in the Draft Proposed Decision, including the conclusion that only actual costs traceable to the Child Abduction and Recovery program and supported by contemporaneous source documentation are reimbursable under the Parameters and Guidelines, and that allocated unit-wide costs generally do not qualify as direct costs for this mandate. The Office also recognizes the distinction drawn between direct costs claimed for program-

specific activities and costs recoverable, if at all, through established indirect cost procedures.

At the same time, our Office notes that OMB Circular A-87, which is referenced in the Parameters and Guidelines, was formally superseded and consolidated into 2 CFR Part 200 in 2014. While the Parameters and Guidelines continue to reference A-87, the successor guidance reflects the current articulation of the cost principles that replaced it. In particular, 2 CFR section 200.405(a)(2) recognizes that costs benefiting both a specific program and other work of an organization may be distributed using reasonable methods that approximate proportional benefit, and section 200.405(d) further provides that where precise proportions cannot be readily determined due to the interrelated nature of the work involved, costs may be allocated on any reasonable and documented basis. These principles reflect the operational reality that the Child Abduction and Recovery program is implemented in Sacramento County where a specialized unit performs multiple state-mandated functions and necessarily relies on shared personnel, equipment, and services to carry out reimbursable activities.

Within this context, the Office respectfully requests narrow reconsideration of the disallowance of certain shared costs to the extent contemporaneous employee time records and supporting documentation exist that identify actual hours devoted to Child Abduction and Recovery activities. Where such documentation supports the portion of shared labor, materials, or services attributable to reimbursable program activities, those costs represent actual costs incurred to implement the mandate, notwithstanding that the same resources also support other programs. This request is not intended to challenge the overall legal conclusions of the Draft Proposed Decision or to recharacterize unit-wide costs as direct costs without adequate support, but rather to allow limited reassessment of whether specific portions of the disallowed shared costs can be substantiated as actual, documented costs incurred in performing reimbursable Child Abduction and Recovery activities.

For these reasons, the Sacramento County District Attorney's Office supports the Draft Proposed Decision's allowance of costs associated with "good cause" cases and the recommendation to reinstate \$32,276 plus related indirect costs. The Office respectfully requests, however, that the Commission reconsider the disallowance of shared costs where those costs can be supported by documentation demonstrating actual program-specific work and proportional benefit in implementing the state-mandated program.

Thank you for the opportunity to submit these comments and for your consideration of our position.

Respectfully submitted,



Michael Blazina
Assistant District Attorney

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 February 10, 2026, I served the:

- **Current Mailing List dated February 3, 2026**
- **Claimant's Comments on the Draft Proposed Decision filed February 10, 2026**

Child Abduction and Recovery, 24-4237-I-04

Family Code Sections 3060-3064, 3130-3134.5, 3408, 3411, and 3421;
Penal Code Sections 277, 278, and 278.5; Welfare and Institutions Code Section 11478.5; Statutes 1976, Chapter 1399; Statutes 1992, Chapter 162; Statutes 1996, Chapter 988

Fiscal Years: 2016-2017, 2017-2018, 2018-2019

County of Sacramento, Claimant

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 February 10, 2026 at Sacramento, California.



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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 2/3/26

Claim Number: 24-4237-I-04

Matter: Child Abduction and Recovery

Claimant: County of Sacramento

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.)

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

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

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

Aaron Avery, Legislative Representative, California Special Districts Association

1112 I Street Bridge, Suite 200, Sacramento, CA 95814

Phone: (916) 442-7887

Aarona@csda.net

Anna Barich, Attorney, Commission on State Mandates

980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562

Anna.Barich@csm.ca.gov

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

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

Michael Blazina, Assistant District Attorney, *County of Sacramento*
Claimant Representative
Office of the District Attorney, 901 G Street, Sacramento, CA 95814
Phone: (916) 874-5294
BlazinaM@SacDA.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

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

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

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

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

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

Adam Cripps, Interim Finance Manager, *Town of Apple Valley*
14955 Dale Evans Parkway, Apple Valley, CA 92307
Phone: (760) 240-7000
acripps@applevalley.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@sdcounty.ca.gov

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

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

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

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

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

Chuck Hughes, Special Assistant District Attorney, *County of Ventura*
Office of the District Attorney, 800 South Victoria Avenue, Suite 300, Ventura, CA 93009
Phone: (805) 477-1635
Chuck.Hughes@venturacounty.gov

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

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

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

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

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@smgov.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

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

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

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

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

Marilyn Munoz, Senior Staff Counsel, *Department of Finance*
915 L Street, Sacramento, CA 95814
Phone: (916) 445-8918
Marilyn.Munoz@dof.ca.gov

Michelle Nguyen, *Department of Finance*
Education Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-0328
Michelle.Nguyen@dof.ca.gov

Andy Nichols, *Nichols Consulting*
1857 44th Street, Sacramento, CA 95819

Phone: (916) 455-3939
andy@nichols-consulting.com

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

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

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

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

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

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

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

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

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

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

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@sbcountyatc.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

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

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@sfrwater.org

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