CITIZEN COMPLAINT FORM

Riverside County Grand Jury P.O. Box 829 Riverside, CA 92502 (951)955-8990

Date: May 16, 2011

Complainant's Name: Dvonne Pitruzzello, Vivian Moreno, Javier Moreno, Mary Shelton, Joel Udayke, Kevin Dawson, and Mary Figueroa

Phone: 951-317-2648 or 951-241-9443

Address: 1258 Shakespeare Drive, Riverside, CA 92506

<u>COMPLAINT is regarding:</u>

City of Riverside 3900 Main Street Riverside, CA 92501

My Complaint is:

In 2006, the City of Riverside utilizing U. S. DOJ Equitable Sharing Program (Police Asset Forfeiture Funds), donated to the Riverside Youth Council/Multi-Cultural Festival the amounts of \$15, 000. \$10,000 and \$10,000. No invoices or checks have been generated or produced to match the location of the deposit for these funds. Request for Public Information Act documents was submitted to the City of Riverside on 04/14/2011 and has produced NO INVOICES for these transactions.

In an Equitable Sharing Program (Police Asset Forfeiture Funds), Federal Annual Certification Report for FY2007, the City of Riverside transferred the amount of \$35,000. from the Police Asset Forfeiture funds to the Multi-Cultural Youth Festival, identified in that report as "Name of Recipient Agency" under section "m. Total Permissible Use Transfers". Request for Public Information Act documents was submitted to the City of Riverside on 04/14/2011 requesting invoices or deposit information for this transaction. According to the City of Riverside Finance Department, no documentation can be produced for this transaction.

In an Equitable Sharing Program (Police Asset Forfeiture Funds), Federal Annual Certification Report for FY2006, the City of Riverside donated the amount of \$2,500. dated 04/05/2006 from Police Asset Forfeiture funds to the Multi-Cultural Youth Festival.

In an Equitable Sharing Program (Police Asset Forfeiture Funds), Federal Annual Certification Report dated FY 2005; the City of Riverside donated the amount of \$2,312.02 from Police Asset Forfeiture funds to the Riverside Youth Council/Multi-Cultural Youth Festival.

Police Asset Forfeiture Funds documentation request to the City of Riverside was submitted and invoices were produced reflecting reimbursement to the Multi-Cultural Youth Festival from Police Asset Forfeiture funds, in an amount exceeding \$90,000. for invoices from JZ Party Supplies in San Bernardino, CA and BCM in New York, NY.

In June of 2003, Connie Howard Leach, the wife of then current City of Riverside Police Chief Russell Leach, volunteered for a position advising the Riverside Youth Council under the control of the Mayor's Office. Subsequently, she received a series of consulting contracts and amendments to those contracts under the name Connie Howard Leach for a position as an Advisor to the Riverside Youth Council and as a consultant to the Multi-Cultural Youth Festival. Those contracts are:

Dated 08/30/2004 for \$20,000. Dated 07/22/2005 for \$25,000. Dated 02/08/2006 for \$50,000. Dated 04/23/2006 for \$15,000. Dated 06/30/2006 for \$50,000. Dated 06/30/2007 for \$50,000. Dated 06/30/2007 for \$50,000. Dated 06/30/2007 for \$42,500. Dated 05/05/2008 for \$9,750.

On September 3, 2004, Connie Howard Leach and her husband then City of Riverside Police Chief Russell Leach, were involved in an initial domestic violence report in San Diego, CA while attending a Police Chief's Conference. While the initial claim of domestic violence was never substantiated, it was noted that during that time Connie Howard Leach received substantial monetary payments for consulting services from the City of Riverside through the City Manager's discretionary funds.

In 2006, Connie Howard Leach received the highest series of consulting fees for services rendered. Significant to this date is July of 2006 when Connie Howard Leach filed for divorce from her then husband City of Riverside Police Chief Russell Leach.

In April of 2008, Connie Leach resigned her position and the last contract for 10 days of service was worth \$9,750.

Documents attached show a city business license in the name of Connie Howard and Russ Leach for IMPACT CONSULTING. However, payments were made out to Connie Leach NOT Impact Consulting.

Consulting fees to Connie Leach were primarily disbursed from the General Fund, covering the departments of Park and Recreation, Economic Development, Redevelopment Agency and the City Manager's Office.

Reimbursement costs for the Riverside Youth Council and the Multi-Cultural Youth Festival in significant amounts for a variety of non-law enforcement purposes came from the General Fund, to include funding from Police Asset Forfeiture Funds.

It is noted in a Press Enterprise article that Connie Howard Leach stated she solicited donations of \$100,000. for funding of the Multi-Cultural Youth Festival. Public Records Information request for documentation on deposit accounting for the \$100,000.was responded with indications that funding for the Riverside Youth Council or Multi-Cultural Youth Festival were deposited into the General Fund by the City of Riverside and therefore tracking accountability is limited.

Form 700, Statement of Economic Interest dated for the years 2004 to 2010, filed by then Chief of Police Russell Leach, does not claim the income source of then wife Connie Howard Leach, as is designated on Schedule A-2 for reporting spouse's income when self-employed.

In 2007, Connie Howard Leach traveled to Washington, D.C. to receive the Lewis Hine Award for her role as an advisor to the Riverside Youth Council. She spent one day in Washington and then traveled to New York to visit family before returning to Riverside, CA. Payment for trip and expenses came from the General fund, City of Riverside.

Names of Individuals involved:

Connie Howard Leach, former Consultant for City of Riverside Russell Leach, former City of Riverside Police Chief Mayor Ronald Loveridge City Manager Brad Hudson Tom DeSantis, former Assistant City Manager, City of Riverside Gregory Priamos, City Attorney, City of Riverside Colleen Nichols, City of Riverside City Clerk Kristin Tilquest, City of Riverside, Mayor's Office, Chief of Staff Frank Schiavone, former City of Riverside Councilman Ward 4 Belinda Graham, City of Riverside, Assistant City Manager John DeLaRosa, former City of Riverside, Acting Chief of Police Paul Sundeen, City of Riverside Finance Director/CFO/Treasurer Ralph Nunez, City of Riverside Director Park & Recreation Department DeAnna Lorson, City of Riverside, Assistant City Manager Tina English, City of Riverside, Director Economic Development Catherine Sainz, City of Riverside Police Department, Budget Analyst

Other agencies or persons contacted about this complaint:

State of California, State Controller, John Chiang - result pending

Riverside County District Attorney Paul Zellerbach - result pending

Proper outcome of Grand Jury involvement?

Prosecution of persons responsible for misappropriation/misuse of public funds.

Reimbursement to the residents of Riverside for misuse of public funds/taxpayer money.

Names and phone numbers of others who can substantiate allegations or provide more information:

Sean Gill, former City of Riverside Contracts Manager Public Works Department

Tim Bacon, retired Lt. Riverside Police Department - 951-850-1924

Karen Akino, City of Riverside Police Department, Budget Analyst

Mario Lara, City of Riverside, City Manager's Office