

Supervisor Alfredo Pedroza supports the Walt Ranch project, but his reasons may have nothing to do with the public interest. His family appears to have benefited from his vote, far beyond campaign contributions.

Under the California Political Reform Act (Government Code §§ 81000 - 91014 and §§ 18110 - 18997 of Title 2 of the California Code of Regulations) a public official has a disqualifying conflict of interest in a governmental decision if it is foreseeable that the decision will have a financial impact on his or her personal finances or other financial interests. In such cases, there is a risk of biased decision-making that could sacrifice the public's interest in favor of the official's private financial interests. To avoid actual bias or the appearance of possible improprieties, the public official is prohibited from participating in the decision. The federal conflict of interest rules are found at 18 U.S.C. § 208 with implementing regulations at 5 C.F.R. § 2635.402. Essentially, these rules prohibit you from taking official action in a particular matter involving any entity in which you, or someone whose interests are imputed to you, have a financial interest.

Inquisitive minds who have followed Napa's environmental/political intersectionality may find Vinedos AP LLC, (Spanish for "Vineyards AP"), an entity worthy of examination. A copy of the 2021 Vinedos annual report to the Secretary of State shows that the Vinedos "manager" is Esteban Llamas. The source of the capitalization of the newly formed Vinedos is not public record. Mr. Llamas is the father of Brenda Llamas Pedroza, wife of Napa County District 4 Supervisor Alfredo Pedroza.

As of last year, Vinedos AP LLC now owns six parcels directly on the western border of the Walt Ranch project, sandwiched between Peter Read and Craig & Kathryn Hall. The Halls and Read had more than adjacent land and development ambitions in common. The Halls contributed \$35,000 to Supervisor Pedroza's 2020 campaign and Read contributed another \$23,100. See this spreadsheet showing his contributions since announcing his win in 2016. Note that his top 30 donors contributed nearly \$400,000, in a district that has less than 17,000 registered voters, with about half voting on local issues. While repugnant to many, in themselves these contributions alone were probably not illegal. Such is the way of American democracy. Since Citizens United the courts have held that big money is free speech, and the rich may speak louder than the majority. The citizens' remedy is at the ballot box but the majority need to turn in their votes.

However, on May 28, 2021 the six parcels were sold in an "off market" transaction to Vinedos AP LLC by Circle-R Ranch for \$2,000,000. Circle-R Ranch provided a \$1,700,000 mortgage to finance the transaction. While the up front \$300,000 and the terms of the personal loan are off record, the recorded deed was sent to Supervisor Pedroza's personal residence.

Supervisor Pedroza subsequently spoke and voted in favor of Walt Ranch without disclosing his family's transactions alongside numerous residents urging the county to prioritize our biodiversity and climate. One may speculate that this is why public opinion was ignored.

Vinedos AP moved seemingly fast: they were able to refinance the parcels five months later for \$2,700,000, a rapid appreciation of \$700,000. At the same time, Supervisor Pedroza refinanced his personal residence, purchased in 2015 for \$760,000, for a new mortgage, also for \$2,700,000. Both mortgages were provided by Sonoma-based Poppy Bank and filed on October 12, 2021. In state filings, Supervisor Pedroza has disclosed that he has an ongoing relationship with Poppy Bank. In short, the public records establish that Supervisor Pedroza's immediate family has potentially received great financial benefits from their close association with the Halls, Read and Poppy Bank. We demand that Supervisor Pedroza recuse himself from any participation on the Walt Ranch Project. At the very least, further consideration of this project must be deferred by the Supervisors until this matter can be fully reviewed and publicly discussed.

These facts demand further inquiry. The District Attorney and other law enforcement agencies should launch a thorough investigation into Supervisor Pedroza's potential conflicting interests, his financial investments and any other influence by development projects while in office. The public needs to know if any of the projects approved by Supervisor Pedroza were subsequently financed by Poppy Bank, and whether his relationship to that entity includes any receipt of compensation from those transactions. It is also worth questioning how his development friendly precedents may benefit his own interests by way of easy permits for conversions and remote wineries in the future.

We believe that Napa County is better than this. We believe the public has a right to know this information.

Beth Nelsen