

The Etiwanda Heights Land Sale

What the Public Should Know About a \$93 Million Surplus Property Sale and Related Campaign Finance Activity

A Public Report | April 2026

Executive Summary

On December 3, 2024, the San Bernardino County Board of Supervisors, acting as the governing body of the San Bernardino County Flood Control District, approved the sale of approximately 1,252 acres of public land in north Rancho Cucamonga to Rancho Etiwanda, LLC for up to \$93 million plus profit-sharing.

Rancho Etiwanda, LLC was formed on November 12, 2024 — only three weeks before the sale was approved — by the chief financial officer of Frontier Enterprises, a Southern California homebuilder owned by James L. ("Jimmy") Previti.

This report presents what public records show about (1) the sale itself, (2) the corporate ownership behind the buyer, and (3) campaign contributions from the Previti corporate network and its associates that flowed to political committees active in San Bernardino County races between 2024 and 2026.

Key documented findings:

- **\$139,099** in contributions from entities and individuals in the Previti corporate network and its closely associated business partners flowed into San Bernardino County political committees during the 24-month period from January 2024 through April 2026.
- **\$86,750** of that total came from a single entity — "IE Citizens for Government, LLC" — registered at the same Ontario address as Frontier Enterprises and managed by the same person who organized Rancho Etiwanda, LLC.
- **Most of the money did not go directly to candidates.** It went to political action committees (PACs) that then spent independently to support or oppose specific candidates. This pattern makes the original source of the money invisible in the candidate's own filings.
- **On May 31, 2024**, Supervisor Dawn Rowe's reelection committee returned \$4,900 in previously-received contributions from FH II Homebuilders (a Frontier subsidiary) and James Previti personally — six months before her vote on the land sale.
- The recipient PACs that received Previti-network funding then conducted **\$108,414 in independent expenditures supporting Ryan Hutchison** for the 2026 Auditor-Controller/Treasurer/Tax Collector race, and tens of thousands more supporting and opposing other candidates in supervisor and county races.

This report does not allege that any specific transaction violated campaign finance law. It documents what public records show about the financial relationships between a major county land buyer and the political committees active in elections that determined who voted on that purchase. Voters and oversight bodies can draw their own conclusions about whether the system, as it currently operates, serves the public interest.

Sources for every figure in this report are public filings: Board of Supervisors agendas (Legistar), California Secretary of State business registrations, and the San Bernardino County NetFile campaign finance portal. Every reader can verify the data independently.

1. The Sale

What the Board approved

The property in question is approximately 1,252.21 acres of vacant land in the Etiwanda Heights Neighborhood and Conservation Plan Area, located north of Interstate 210 between Deer Creek and Day Creek in the City of Rancho Cucamonga. The San Bernardino County Flood Control District has owned this land for decades. It was originally acquired to manage stormwater runoff from the San Gabriel Mountains, but improvements over the past 40 years (debris dams, channels, spreading grounds) have made the land no longer necessary for flood control.

The sale was approved in two stages:

- **October 22, 2024 (Item No. 61):** The Board adopted Resolution 2024-154 declaring the property "exempt surplus land" under Government Code § 54221(f)(1)(N), making it eligible for direct sale without affordable-housing restrictions that would otherwise apply under the Surplus Land Act.
- **December 3, 2024 (Item No. 58):** The Board approved a Purchase and Sale Agreement with Rancho Etiwanda, LLC. The agreed price is up to \$93 million, plus interest, plus an additional profit-sharing arrangement worth up to \$20 million more if the buyer resells or develops the land. The buyer can purchase the property in a single transaction or in phases over a 5-year original term, with an option to extend another 5 years.

This item had originally been scheduled for the November 19, 2024 meeting but was continued to December 3, 2024 due to what the Board described as missing paperwork.

Why this matters

A \$93 million-plus public land sale is one of the largest single asset disposals San Bernardino County has approved in recent years. The terms of the agreement — including the multi-year phased acquisition, the discretion granted to the County Chief Executive Officer to execute future grant deeds without returning to the full Board for approval, and the profit-sharing structure — make it a transaction that rewards careful public scrutiny.

Approval requires four affirmative votes from the five-member Board of Supervisors. Each Supervisor's vote — and each Supervisor's election — is therefore directly relevant to whether and on what terms the sale proceeds.

2. Who Is Behind Rancho Etiwanda, LLC

Rancho Etiwanda, LLC presents itself in the Purchase and Sale Agreement as the buyer of record. According to its filings with the California Secretary of State, the LLC was formed on November 12, 2024 — just three weeks before the December 3 Board approval.

The LLC's registration documents disclose:

- **Entity number:** 202464518526 (California Secretary of State)
- **Principal address:** 2151 E. Convention Center Way, Suite 222, Ontario, CA 91764
- **Manager:** Richard Munkvold
- **Stated business:** Property owner

Richard Munkvold has served as Chief Financial Officer of Frontier Enterprises since May 2005. Frontier Enterprises is a Southern California homebuilder owned by James L. ("Jimmy") Previti, who also serves as its President and CEO. Both Frontier Enterprises and Rancho Etiwanda, LLC operate from the same address: 2151 E. Convention Center Way, Suite 222, Ontario.

The Frontier corporate network is extensive. According to California Secretary of State records, Munkvold is the manager or officer of at least 37 active California business entities, all operating from this same Ontario address. These include:

- Frontier-branded entities: Frontier Enterprises, Frontier Communities, Frontier Homes, Frontier Brokers, Frontier Land Holdings, Frontier JV LLC, Frontier Commercial LLC, Frontier Finance Co.
- FH II family: FH II Homebuilders Inc., FH II LLC, FH II Nu Ventures LLC
- Project-specific LLCs: Adelanto 200 LLC, Norco LLC, Norco Commercial LLC, Norco Hotel LLC, Aragon West LLC, Rialto Apartments LLC, Hesperia Apartments LLC, Vasari 2A/2B/2C LLC, and many others
- New "Previti Group" branding: The Previti Group (corporation, formed May 2024) and The Previti Group, LLC (formed May 2024)
- "IE Citizens for Government, LLC" — formed in January 2009 at the same address (significance discussed in Section 3 below)

Following Board approval of the December 3, 2024 sale, three additional companion LLCs were formed on January 14, 2025 — about six weeks later:

- Rancho Etiwanda 1, LLC
- Rancho Etiwanda 2, LLC
- Rancho Etiwanda 3, LLC

These companion LLCs appear designed to receive the phased grant deeds anticipated under the Purchase and Sale Agreement (corresponding to the South, Central, and North areas of the property). All three are registered to the same Ontario address and managed by the same individual.

Bottom line: who owns what

Although the Purchase and Sale Agreement names "Rancho Etiwanda, LLC" as the buyer, the practical economic owner is James L. Previti, operating through Frontier Enterprises and a network of related single-purpose entities. Press reports have also identified Jeffrey Burum — a Rancho Cucamonga developer and principal of Diversified Pacific — as a business partner of

Previti's in this transaction, although the two have not jointly disclosed that partnership in the public filings reviewed for this report.

3. Campaign Contributions from the Previti Corporate Network

To assess what financial relationships exist between the buyer's corporate network and elected officials in San Bernardino County, this report reviewed all Schedule A contributions filed with the San Bernardino County NetFile campaign finance portal for the period January 1, 2024 through April 18, 2026. Total transactions reviewed: 16,513. Total Previti-network footprint identified: \$139,099 across 14 transactions.

The contributions fall into two distinct categories.

A. Direct contributions to candidates

A small number of contributions went directly from Frontier-network entities or their principals to candidate committees. These appear in the candidate's own Form 460 filings.

Date	Amount	From	To (Recipient Committee)
8/27/2024	\$5,500	FH II Homebuilders Inc	Holley For School Board 2024
10/18/2024	\$249	Jeffrey Burum (personal)	Warren for Cucamonga Valley Water District 2024
12/30/2025	\$1,000	Jeffrey Burum (Diversified Pacific)	Shannon Dicus for Sheriff 2026
12/31/2025	\$2,500	Diversified Pacific Development Group LLC	Hutchison for Auditor-Controller/Treasurer/Tax Collector 2026

In addition, the data shows two refund transactions on May 31, 2024, in which Supervisor Dawn Rowe's reelection committee returned previously-received Previti-network contributions:

- **-\$2,400** returned to FH II Homebuilders, Inc.
- **-\$2,500** returned to James Previti (listed as CEO of Empire Companies, the related entity formerly run by his father)

Refunds of this kind are uncommon and significant. They typically occur when a campaign committee identifies a contribution that should not have been accepted — for example, because of a regulatory limit, an appearance-of-conflict concern, or a contributor's involvement in a pending matter before the elected official's body. The original contributions were made before this dataset's coverage period and would appear in earlier (2022 or 2023) NetFile records. The fact that they were returned six months before the December 3, 2024 sale vote is notable.

B. Indirect contributions through political action committees

The substantially larger flow of money — \$134,750 of the \$139,099 total — went not to candidates directly but to political action committees (PACs) that then spent that money independently to influence candidate races. This is legal under California campaign finance law, but it has the practical effect of making the original donor invisible to anyone reviewing only the candidate's own contribution disclosures.

The single largest contributor in the Previti network is an entity called "IE Citizens for Government, LLC." Despite its civic-sounding name, this LLC is registered at the same Ontario address as Frontier Enterprises and shares its corporate management. Public records show it has no apparent business operations beyond making political contributions.

Date	Amount	Recipient PAC
1/10/2024	\$29,750	Protect Our County PAC
2/22/2024	\$20,000	Protect Our County PAC
4/8/2024	\$15,000	Business Leaders and Workers United
9/12/2025	\$17,000	Inland Empire Ratepayers Coalition
9/12/2025	\$5,000	Inland Empire Ratepayers Coalition
Total	\$86,750	(across 4 PACs)

Other significant indirect contributions in the same period:

- **\$38,000** from FH II Homebuilders, Inc. to Committee for Effective Government (February 13, 2024)
- **\$10,000** from Diversified Pacific Development Group LLC (Borum's primary entity) to two variants of Moving Our Communities Forward PAC (October 14, 2024)

C. Where the PAC money went

PACs that received contributions from the Previti network then spent that money on independent expenditures supporting and opposing specific candidates. The independent expenditure totals shown below are the PACs' total spending on each candidate, not just the Previti-network share.

PAC	Total IE Spending	S/O	Notable Targets
Inland Empire Ratepayers Coalition	\$217,635	Mostly Support	Ryan Hutchison (ATC) — \$108,414
Committee for Effective Government	\$181,851	Mostly Oppose	Cetina, Gibboney, Penman, Gonzales, others
Protect Our County PAC	\$138,234	Both	Jesse Armendarez (Sup. D2), Joe Armendarez, Warren
Moving Our Communities Forward PAC	\$81,450	Both	Various candidates including Smith, Gonzalez
Business Leaders and Workers United	\$41,175	Support	Cothran, Gish, Holley, Montalvo, others

Of particular note for the 2026 elections:

- **\$108,414 in independent expenditures supported Ryan Hutchison** for the 2026 Auditor-Controller/Treasurer/Tax Collector race, funded in part by the Previti-network's \$22,000 contribution to Inland Empire Ratepayers Coalition.
- **\$10,500 in independent expenditures supported Jesse Armendarez** for Supervisor District 2, funded in part by the Previti-network's \$49,750 contribution to Protect Our County PAC. Supervisor Armendarez voted to approve the December 3, 2024 land sale.

4. Why This Pattern Matters

California campaign finance law treats direct contributions and independent expenditures very differently:

- **Direct contributions to candidates** are subject to per-donor contribution limits (\$5,900 per election in San Bernardino County races as of 2026) and are reported on the candidate's own Form 460. A voter looking up the candidate's filings sees these.
- **Independent expenditures by PACs** are not limited in amount and do not appear on the supported candidate's filings. The candidate's filings show only direct contributions; PAC spending on the candidate's behalf is reported on the PAC's separate filings.

This means that a \$250 direct contribution to a candidate is plainly visible to anyone reviewing that candidate's records. A \$50,000 contribution to a PAC that then spends \$40,000 supporting that candidate is not — unless the public knows which PACs are active in the race and pulls each PAC's separate filings.

In this case, public records show:

- Five members of the Board of Supervisors voted on the Etiwanda Heights sale: Cook (1st), Armendarez (2nd), Rowe (3rd), Hagman (4th), and Baca, Jr. (5th).
- None of these Supervisors received direct contributions from Rancho Etiwanda, LLC, Frontier Enterprises, or James Previti within the 2024–2026 reporting period reviewed for this report.
- However, PACs that received Previti-network funding made independent expenditures supporting some of these Supervisors in their elections.
- Supervisor Rowe's committee returned \$4,900 in earlier Previti-network contributions on May 31, 2024 — six months before her vote on the sale.

What this report does and does not say

This report does not allege that any participant — the Supervisors, the buyer, the recipient PACs, or anyone associated with them — has violated any law. The conduct described in this report is, on the face of the public records, lawful under current California campaign finance regulations and the structure of independent expenditure committees.

This report does document that the same Southern California homebuilder who acquired more than 1,250 acres of public land for \$93 million plus profit-sharing has, through a network of related corporate entities and a closely-held LLC named for civic engagement, contributed approximately \$139,000 to political committees that have, in turn, spent more than half a million dollars influencing San Bernardino County elections during the period in which the land sale was being negotiated and approved.

Whether this pattern represents an acceptable functioning of democratic politics or a corrosive influence on local governance is a question for voters, oversight bodies (including the Campaign Accountability Commission and the Fair Political Practices Commission), and the public to consider.

5. Sources and How to Verify

Every figure and finding in this report can be independently verified using public records. Below are the primary sources used:

The land sale

- San Bernardino County Legistar — Board of Supervisors agendas, October 22, 2024 (Item No. 61) and December 3, 2024 (Item No. 58). Available at sanbernardino.legistar.com.
- Resolution 2024-154 (Surplus Land Declaration) and the Purchase and Sale Agreement and Escrow Instructions — attached to the Legistar records for the respective items.
- California Government Code §§ 54220–54234 (Surplus Land Act) and § 54221(f)(1)(N) (exempt surplus land for revenue-generating district uses).

The buyer's corporate identity

- California Secretary of State Business Search — bizfileonline.sos.ca.gov. Search for entity number 202464518526 (Rancho Etiwanda, LLC) and related Frontier-network entities.
- Statement of Information (Form LLC-12) and Articles of Organization (Form LLC-1) on file with the California Secretary of State.

Campaign finance data

- San Bernardino County NetFile portal — netfile.com/Connect2/api/public, jurisdiction SBD. Bulk Excel exports of all campaign finance schedules (A, C, D, E, F, G, B1, B2, H, Form 497, Form 496) for calendar years 2024, 2025, and 2026 (through April 18, 2026) form the underlying data.
- Form 460 filings from candidate committees and PACs registered in the San Bernardino County jurisdiction.
- Form 497 (24-hour late contribution reports) for the period leading up to the June 2, 2026 primary.

Methodology

Schedule A contributions across all 16,513 transactions in the SBD jurisdiction for January 1, 2024 through April 18, 2026 were searched for any of the following indicators of Previti-network origin: contributor or intermediary surnames matching "Previti," "Munkvold," or "Borum"; contributor entity names containing any of 25 known Frontier-network or related corporate identifiers; contributor or intermediary addresses containing "2151 Convention Center" or its variants; and contributor employer or occupation fields containing "Frontier" (excluding Frontier Communications, the unrelated telecommunications company), "Previti," or "Empire Companies." Identified matches were aggregated and cross-referenced against PAC recipient identities. The same data files have been preserved for ongoing public review.

— End of Report —

Prepared from public records. The author of this report invites verification, correction, and additional context from members of the public, the entities named, and oversight bodies.