



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Matt Arnaiz
Holman Investors, LLC.
3200 E. Eight Mile Road
Stockton, CA 95212

Holman Investors, LLC
P.O. Box 8596
Stockton, CA 95208
Attn: Matt Arnaiz

Arnaiz Development Co., INC.
Attn: Richard K. Denhalter Esq.
General Counsel
3400 Eight Mile Road
Stockton, CA 95212

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: CANNERY PARK (DA2-03)

Dear Mr. Arnaiz,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Cannery Park Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the DA.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance

Holman Investors LLC

3400 E. Eight Mile Road, Stockton, CA 95212 (209) 931-9740 FAX (209) 931-9741

December 10, 2025

Anson Lihosit
Senior Planner
Community Development Department
345 N. El Dorado Street, Stockton CA 95202

Re: Cannery Park Development Agreement Compliance Update

Mr. Lihosit,

The following provides an update of the progress made related to the Cannery Park project since the previous Compliance Update dated December 5, 2024:


The Eight Mile Road / Holman Road intersection improvements have been completed, and Holman Road has been opened to public traffic from PFC Jesse Mizener Street to Eight Mile Road.

Final Subdivision Maps have been recorded, public improvements commenced, and home construction started for Cannery Park Units 13-15 consisting of 331 single family lots.

Please let me know if there is any additional information that I may be able to provide.

Sincerely,

Holman Investors, LLC


Matthew Arnaiz



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Dea Spanos Berberian, as Trustee of F. Spanos Nonexempt Trust FBO Dea Spanos Berberian established U/D/T dated January 27, 1998, and A. Spanos Nonexempt Trust FBO Dea Spanos Berberian, established U/D/T dated January 27, 1998, 3520 Brookside Road, Suite #171 Stockton, CA 95219

Sheppard, Mullin, Richter & Hampton LLP
650 Town Center Drive, 19th Floor
Costa Mesa, CA 92626
Attn: Corey Steady
(714) 513-5100

Sheppard, Mullin, Richter & Hampton LLP
350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071
Attn: Justin Mahramas
(213) 617-4101

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: DELTA COVE (P21-1098)

Dear Ms. Spanos Berberian,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Delta Cove Development Agreement: it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance

January 7, 2026

VIA EMAIL

Anson K. Lihosit, AICP
Senior Planner, Advanced Planning
City of Stockton
Community Development Department
345 N. El Dorado Street, Stockton, CA 95202
Email: Anson.Lihosit@stocktonca.gov

Re: Delta Cove Development Agreement (P21-1098) Compliance Letter

Dear Mr. Lihosit:

This letter is submitted to the Planning Commission of the City of Stockton pursuant to the requirements of California Government Code Section 65865.1 and Section 16.128.110.D of the Stockton Municipal Code and in accordance with Section 10.1 of the Development Agreement PS1-1098 (the "Development Agreement"), and your request dated December 5, 2025.

Dea Spanos Berberian, as Trustee of the F. Spanos Nonexempt Trust FBO Dea Spanos Berberian, established U/D/T dated January 27, 1998, as amended, and Dea Spanos Berberian, as Trustee of the A. Spanos Nonexempt Trust FBO Dea Spanos Berberian, established U/D/T dated January 27, 1998, as amended (collectively, "Owners"), the owners of the property known as Delta Cove (the "Property") submit this letter regarding ongoing compliance with Development Agreement by the Owners with respect to the Property.

Owners have requested the consent of the City of Stockton (the "City") to the assignment of the Development Agreement to Atlas Tract Property Holdings LLC, a California limited liability company, which is owned by the Owners, and which has been formed to focus on the ownership and development of the Property. The Owners plan to transfer the Property and the Development Agreement to the New Owner upon receipt of that consent by the City.

Delta Cove is a planned residential community of approximately 360 acres of land in the City. For this project, the City approved the Development Agreement and Vesting Tentative Map of Tract No. P09-160/P19-0585, subdivisions of San Joaquin County (the "Vesting Tentative Map"). The Development Agreement, the Vesting Tentative Map, and associated approvals for the Delta Cove Planned Development Project (PD3-08) are set to expire on January 1, 2038, with the possibility of a five-year extension.

Owner has not begun construction of residential units on the Property but continues to position the Property in order to commence the future development in accordance with the Development Agreement. The Property is currently being leased to a farmer for agricultural purposes under a short term lease.

Please do not hesitate to reach out with any questions regarding the Development Agreement.

City of Stockton
January 7, 2026
Page 2

Sincerely,

A handwritten signature in blue ink that reads "Dea Spanos Berberian". The signature is written in a cursive style with a horizontal line underneath the name.

Dea Spanos Berberian, as Trustee of
the F. Spanos Nonexempt Trust FBO Dea Spanos Berberian,
established U/D/T dated January 27, 1998, as amended

A second handwritten signature in blue ink, identical to the first, reading "Dea Spanos Berberian" with a horizontal line underneath.

Dea Spanos Berberian, as Trustee of
the A. Spanos Nonexempt Trust FBO Dea Spanos Berberian,
established U/D/T dated January 27, 1998, as amended

SMRH:4931-9470-6817.6

cc: Mr. Alexandros Economou, Ownership Representative
Mr. Michael McDowell, Assistant Director



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Greenlaw Development, LLC
Attention: Rob Mitchell
18301 Von Karman Avenue, Suite 301
Irvine, CA 92612

Thia Cochran
Cochran Law Group
18301 Von Karman Avenue, Suite 301
Irvine, CA 92612

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: MARIPOSA INDUSTRIAL PROJECT (P20-0805)

Dear Mr. Mitchell,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of Mariposa Industrial Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

A handwritten signature in black ink that reads "Anson K. Lihosit".

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance



December 17, 2025

Mr. Anson K. Lihosit, AICP
Senior Planner, City of Stockton
345 N El Dorado Street, Stockton, CA 95202

**RE: 2025 ANNUAL DEVELOPOMENT AGREEMENT REVIEW: MARIPOSA
INDUSTRIAL PARK 1 INDUSTRIAL PROJECT (P20-0805)**

Dear Mr. Lihost:

Attached, please find a chart listing compliance with the terms of the above referenced Development Agreement.

The construction of the first phase of the project, the WalMart project, is still under way with scheduled completion next year.

Please let myself, or our Project Manager, Mike Souza (mike@souzard.com), know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rob Mitchell', written over a light gray rectangular background.

Rob Mitchell
Greenlaw Partners



Greenlaw/City of Stockton DA Review

Mariposa Industrial Park 1

December 2025

Section 2.1, LAFCO Annexation	Annexation complete
Section 6.1, CFD Formation	CFD formation complete
Section 6.2, and 7.2.2 Funding for CFD Formation	Payment made, CFD formation complete
Section 8.3, Mitigation Measures	Applicable mitigation measures are being implemented through the construction documents
Section 8.3.1, Prohibition of Cold Storage	No cold storage is proposed
Section 8.3.2, Additional Construction Requirements	Being implemented on construction drawings
Section 8.3.3, Additional Signage Requirements	City responsibility
Section 8.3.4 Additional Financial Contribution	This payment has been made



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

c/o PCCP LB Mariposa Lakes, LLC 10100 Santa Monica Boulevard, Suite 1000 Los Angeles, CA 90067 Attention: Legal Notices	c/o PCCP LB Mariposa Lakes, LLC 200 Pine Street, 29th Floor San Francisco, CA 94111 Attention: Phil Russick	Kamilos Companies, LLC 11249 Gold Country Blvd., Suite 190 Gold River, CA 95670
---	--	---

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: MARIPOSA LAKES SPECIFIC PLAN (DA7-05)

Dear Mr. Kamilos,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Mariposa Lakes Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of non-compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Non-Compliance

Anson Lihosit

From: Gerry Kamilos <GKamilos@kamilos.com>
Sent: Sunday, March 1, 2026 4:11 PM
To: Anson Lihosit
Cc: Michael McDowell; Phil Russick (prussick@pccpllc.com)
Subject: RE: Mariposa Lakes DA - Annual Compliance Report Request

CAUTION: This email originated from outside the City of Stockton. Do not click any links or open attachments if this is unsolicited email.

Good afternoon, Anson,

The purpose of this email is to provide the City of Stockton the required Mariposa Lakes' DA – Annual Compliance Report. The follow activity occurred for the benefit of the Mariposa Lakes Project in 2025:

1. Most of 2025 was spent working with City staff that resulted on an October 14, 2025 report to the City of Stockton Planning Commission that the annexation agreement exhibit for the Mariposa Lakes Development Agreement (Attachment 1) was signed and notarized as requested by the Planning Commission in April 2025.
2. The Mariposa Lakes team continued in 2025 to its work to analyze services, utilities, and infrastructure needed for Specific Plan area in preparation to submit an annexation request to SJ LAFCO to decide which portions would be the initial annexation area.

Please do not hesitate to contact me if you need any further information.

Sincerely,

Gerry

Gerry Kamilos
Office 916-631-8440
Cell 916-802-8070



From: Anson Lihosit <Anson.Lihosit@stocktonca.gov>
Sent: Friday, December 05, 2025 4:17 PM
To: Gerry Kamilos <GKamilos@kamilos.com>
Cc: Michael McDowell <Michael.McDowell@stocktonca.gov>
Subject: Mariposa Lakes DA - Annual Compliance Report Request

Good afternoon, Mr. Kamilos,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Mariposa Lakes Development Agreement (DA): it is the duty of the applicant and/or

ATTACHMENT C

the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA. Please see the letter attached.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of non-compliance letter attached. For reference, you may see last year's reporting at this link: [2024 Annual Compliance Review for Development Agreements](#).

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Thank you.

Cordially,



Anson K. Lihosit, AICP
Senior Planner, Advanced Planning
Community Development Department
345 N. El Dorado Street, Stockton, CA 95202
Direct: (209) 937-8316



COMMUNITY DEVELOPMENT DEPARTMENT

345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Kirk DeJesus
Port Director
Port of Stockton
P.O. Box 2089
Stockton, CA 95201

Mr. A. Richard Aschieris
Port Director
Port of Stockton
P.O. Box 2089
Stockton, CA 95201

Steven A. Herum
Herum/Crabtree
5757 Pacific Avenue, Suite 222
Stockton, CA 95207

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: PORT OF STOCKTON (P12-087)

Dear Mr. DeJesus,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Port of Stockton Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance

PORT OF STOCKTON

Phone: (209) 946-0246



Fax: (209) 465-7244

January 22, 2026

Mr. Anson K. Lihosit, AICP
Senior Planner, Advanced Planning
City of Stockton
345 N. El Dorado Street
Stockton, CA 95202

Port of Stockton Development Agreement (P12-087) – Annual Review Statement

Dear Mr. Lihosit,

In satisfaction of Stockton Municipal Code section 16.128.110(D), the Port of Stockton presents the following 2025 statement.

The Port is in full compliance under that certain Development Agreement between the City of Stockton and Port of Stockton recorded December 24, 2012.

By way of background, this Development Agreement has several unique features. First, it is a development agreement between two public agencies rather than between a city or county and a private landowner. Second, the certainty and stability of the Development Agreement evolves in the City's favor. The Port's obligation is to operate under this certainty and stability to create economic opportunities and family wage jobs. Thus, Recital B states that the City "seek(s) to assure development of the Project Site" because, according to Recital I, the Port "is the leading engine producing job opportunities and economic growth in the City of Stockton and it is in the vital public interest to assure" the Port successfully operates. Thus, Recital J explains that the City "intends by this Development Agreement to provide the Port of Stockton with a vested right to operate" according to current ordinance, policies and standards.

Accordingly, the Port's duty under the Development Agreement is the common law good faith requirement to operate in a manner to try and create "job opportunities and economic growth" facilitated in part by the certainty and stability offered by the Development Agreement. For purposes of clarity, we provide recent statistics concerning the Port's efforts to create family wage jobs and economic growth in Stockton.

Since 2012, the Port has entitled 30 major development projects with an estimated capital investment of \$766 million with the potential to create approximately 1,848 direct and indirect jobs. Over a 20-year period looking at wages, benefits, revenue streams, etc. these projects are estimated to have an economic benefit of more than \$1.3 billion.

The Port has multiple pending projects it is currently working on with an estimated capital investment of over \$513 million and the potential to create approximately 1,197 direct and indirect jobs.

Since 2012, Port projects have generated approximately \$6.5 million in City permit fees and have supported approximately \$99.5 million in possessory interest (property tax) revenue for San Joaquin County.

Should you have any questions regarding the Port's Development Agreement Annual Review Statement, please contact me at rnelson@stocktonport.com or (209) 946-0246.

Sincerely,



Rhonda Nelson
Director, Real Estate & Port Development
Port of Stockton

cc:

Kirk DeJesus, Port Director
Steven A. Herum, Port Counsel



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Sanctuary by Grupe, LLC
3255 W. March Lane, Suite 400
Stockton, CA 95219
Attention: Nelson Bahler

Michael D. Hakeem, Esq.
Hakeem, Ellis & Marengo
3414 Brookside Road
Stockton, CA 95219

Jeremy S. White
Chief Operating Officer
The Grupe Company
3255 West March Lane, Suite 400
Stockton, CA 95219

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: SANCTUARY (DA3-05)

Dear Mr. White,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Sanctuary Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance



December 9, 2025

Via Email: Anson.Lihosit@stocktonca.gov

Mr. Anson Lihosit
Senior Planner, Advanced Planning
City of Stockton
345 North El Dorado St
Stockton, CA 95202

Re: Sanctuary Development Agreement (City Refers to as DA3-05) – Annual Review
Compliance Certification

Dear Mr. Lihosit:

Thank you for your letter dated December 5, 2025 requesting our annual compliance certification. I understand that the purpose of the letter, which is being sent to all developers with active Development Agreements, is to obtain the developers good faith opinion that they are in compliance with their specific development agreement. In addition, according to section 4.04(b) of our Development Agreement, this letter is submitted to the City pursuant to the requirements of Government Code section 65865.1 and Municipal Code section 16-525.110.

The Development Agreement is between the City and Sanctuary By Grupe (“SBG”), which is a single purpose entity, to structure the planning and development of the Sanctuary project. SBG’s managing member is Grupe Investment Company, Inc, of which I am the Chief Operating Officer. I’ve been employed by The Grupe Company for nearly 30 years and have been involved with the entitlement process for Sanctuary, therefore, I’m the most qualified to respond to the City’s request.

Since our last annual review compliance certification was submitted to the City on December 4, 2024, SBG has continued progress on Sanctuary in preparation to commence development. The recent activities include but are not limited to:

1. Continued consulting with Siegfried Engineering, our civil engineer, related to the development of Sanctuary, including the levee improvement project referenced in #2.

SANCTUARY BY GRUPE

3255 West March Lane 4th Floor, Stockton, CA 95219 · P.O. Box 7576, Stockton, CA 95267-0576
209/473-6000

2. Continued consulting with Kjeldsen, Sinnock & Neudeck, our flood control engineer, and the Reclamation District 2115, to work with SJAFCA (on behalf of the U.S. Army Corps of Engineers) for a levee improvement project.

After reviewing the Development Agreement, it is our opinion we are in good faith compliance with its' terms. Pursuant to section 4.04(c) of the Development Agreement, we respectfully request written confirmation from the Community Development Director supporting our finding.

If you should have any questions, please do not hesitate to contact me via email (jwhite@grupe.com) or phone (209-473-6068).

Sincerely,

GRUPE INVESTMENT COMPANY, INC.



Jeremy S. White
Chief Operating Officer



COMMUNITY DEVELOPMENT DEPARTMENT

345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Rosie A. Ruppel
General Counsel
A.G. Spanos Construction, Inc.
10100 Trinity Parkway, 5th Floor
Stockton, CA 95219

A.G. Spanos Construction, Inc.
1341 W. Robinhood Drive, Suite B-5
Stockton, CA 95207
Attention: Jerry Murphy

John Briscoe
Washburn, Briscoe & McCarthy
55 Francisco Street, Suite 600
San Francisco, CA 94133

**RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: SPANOS PARK WEST (BUSINESS PARK DA1-00)
AND DENSITY TRANSFER AGREEMENT (DA3-01)**

Dear Ms. Ruppel,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Spanos Park West Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

We received a correspondence letter from you dated March 3, 2025, that stated that A.G. Spanos Construction Inc. contributed \$200,000 to an organization that constructed the Anchor Village Apartments for the provision of affordable housing. On March 25, 2025, I sent an email requesting specific details about the payment. I did not receive a response to that request. During the public hearing, there were parties interested in that donation. On December 9, 2008, the Stockton City Council obligated with Ordinance 029-08, the requirement to construct high density residential units, pay the city \$2,000 per unit or contribute \$2,000 per unit to a non-profit charitable organization. As part of your compliance report, please include to verify:

1. A receipt or a copy of cancelled check of this transaction.
2. Provide evidence that this is a non-profit charitable organization.
3. Provide evidence that the organization was reasonably approved by the city, prior to the contribution.
4. The date that this contribution was made.
5. The purpose of the contribution.

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance

April 7, 2026

City of Stockton – Community Development Department
Attn: Anson K. Lihosit, Senior Planner
345 North El Dorado
Stockton, California 95202
Email: anson.lihosit@stocktonca.gov

**RE: PERIODIC REVIEW OF COMPLIANCE OF SPANOS PARK WEST
DEVELOPMENT AGREEMENT (BUSINESS PARK DA1-00) AND DENSITY
TRANSFER AGREEMENT (DA3-01)**

Dear Anson:

This letter is submitted to the Planning Commission of the City of Stockton pursuant to the requirements of California Government Code Section 65865.1 and Code Section 16-192 and in accordance with Section 7.1 of the Spanos Park West Development Agreement dated January 29, 2002, Section 7.1 of the Spanos Park West Density Transfer Development Agreement dated December 5, 2025.

The City of Stockton, a municipal corporation of the State of California (“City”) entered into that certain Spanos Park West Development Agreement dated January 29, 2002 (the “DA”) and that certain Spanos Park West Density Transfer Development Agreement dated January 29, 2002 (the “Original DDA”) by and between the City and A. G. Spanos Construction, Inc. (“AGSC”). The DA and the Original DDA were both recorded in the Official Records of San Joaquin County on March 11, 2002, as Document Nos. 2002-041898 and 2002-041899 respectively. The Original DDA was subsequently amended by that certain First Amendment to Spanos Park West Density Transfer Development Agreement dated December 9, 2008 and that certain Second Amendment to Spanos Park West Density Transfer Development Agreement dated August 10, 2023 (the Original DDA, as amended by the foregoing, is hereinafter referred to as the “DDA”).

The real property which is subject to the DA and the DDA is that certain parcel of land commonly referred to as Spanos Park West and the development rights appurtenant or applicable thereto (collectively referred to herein as the “Project”).

City and AGSC entered into the DA dividing Spanos Park West into two (2) parcels (namely, The Villages at Spanos Park and an M-X, mixed use, component named “The A. G. Spanos Business Park” (“Business Park”)) and approved a Master Development Plan for the

Spanos Park West Business Park Periodic Review
April 7, 2026
Page 2

development of the Business Park. Thereafter, on April 30, 2002, City approved an amended Tentative Map (TM 11-00) for the Business Park containing parcels 1 through 20. AGSC developed Lot 19 of TM 11-00 into the A. G. Spanos Office Building, and, with the consent of City, sold and transferred title to numerous other parcels to various entities for retail use. Additionally, on October 23, 2003, a Parcel Map re-dividing Lots 17A, 17, 10 and 7 of TM 11-00 into four (4) parcels (namely, Parcel 1, Parcel 2, Parcel 3 and Parcel 4) was duly recorded in the official Records of San Joaquin County as DOC # 2003-245479 (“Parcel Map”). AGSC, with the approval of City, sold Parcels 1 and 2 of the Parcel Map for retail use and dedicated Parcel 4 of the Parcel Map as a one hundred foot (100') Public Access and Landscape Easement, and, with the exception of the A. G. Spanos Office Building and Parcel 3 of the Parcel Map (consisting of 4.23 acres), AGSC has divested itself of any ownership within the Business Park.

The DDA was entered into and adopted for the purpose, among other things, of reserving land for high-density residential development consistent with the minimum acreage requirements contained in the City’s then-current General Plan Housing Element. In order to assure that approval by City of the Project does not result in non-compliance with the General Plan, AGSC has agreed to provide for and construct a minimum of Nine Hundred Thirty-Five (935) multi-family units within the Mixed-Use component of the Project. As of the date of this letter, Owner has developed and constructed (or caused to be developed and constructed) Three Hundred Eight (308) high-density residential units within the Project.

The Stockton metropolitan housing market has experienced a significant decline in demand for high-density residential units. Simultaneously, the commercial density within the Project has increased. Consequently, there is insufficient vacant land within the Project to accommodate the additionally required Six Hundred Twenty-Seven (627) high-density residential units specified under the DDA. In response to the insufficient vacant land within the Project, AGSC anticipates that Three Hundred Ninety-Two (392) high-density residential units will be constructed within the Crystal Bay Project (as defined and specified in Planned Development PD1-08 and Vesting Tentative Map TM17-05) and the Ninety-Six (96) high-density units within the Atlas Tract Project (as defined and specified in Planned Development PD3-06 and Vesting Tentative Map VTM7-08 and VTM28-05) all as set forth in more detail in the permitting documents for both of these projects. Alternatively, AGSC may fulfill the obligation to construct (or cause to be constructed) the high-density residential units referenced above by: (i) paying (or causing to be paid) to the City the sum of Two Thousand and 00/100 Dollars (\$2,000.00) per High-Density Unit on or before February 28, 2032, or (ii) making a contribution on or before February 28, 2032 in an amount not less than Two Thousand and 00/100 Dollars (\$2,000.00) per High-Density Unit to one or more non-profit charitable organizations reasonably approved by the City and having among their purpose(s) the objective of assisting in the provision of housing to residents within the greater downtown or other priority area(s) determined by the City, or (iii) a combination of (i) and (ii), such that the percentage performance of AGSC under both (i) and (ii) equals one hundred percent (100%).

Spanos Park West Business Park Periodic Review
April 7, 2026
Page 3

To date, AGSC has contributed Two Hundred Thousand and 00/100 Dollars (\$200,000.00) to an organization that constructed the Anchor Village Apartments located in downtown Stockton for the provision of affordable housing along with services for veterans at risk of homelessness and individuals living with special needs. AGSC intends to further comply with the provisions of the DA and the DDA as required.

Please contact us should you wish to discuss the status of any portion of the Project. Thank you.

A. G. SPANOS CONSTRUCTION, INC.

By: 

Steven L. Cohen
Executive Vice President



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

CommonSpirit Health 3200 N. Central Avenue 23 rd Floor Phoenix, AZ 65012 Attention: Senior Vice President National Real Estate Services	CommonSpirit Health 3400 Data Drive Rancho Cordova, CA 95670 Attention: National Real Estate Services	CommonSpirit Health 3200 N. Central Avenue 23 rd Floor Phoenix AZ 65012 Attention: Legal Team	President and CEO St. Joseph's Medical Center 1800 N. California Street Stockton, CA 95204
--	---	--	--

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: ST. JOSEPH'S MEDICAL CENTER OF STOCKTON (P21-0958)

Dear Senior Vice President,

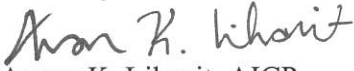
Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the St. Joseph's Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,


Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance



St. Joseph's Medical Center
Stockton
1800 N. California Street
Stockton, CA 95204
Direct (209) 943-2000

January 09, 2026

Anson Lihosit
Senior Planner, Advanced Planning
City of Stockton
Community Development Department
345 North El Dorado
Stockton CA 95202

Re: Annual Review of the Development Agreement between the City and the Port City Operating Company, LLC, doing business as St. Joseph's Medical Center of Stockton

Dear Anson:

We are pleased to submit this third annual review of the Development Agreement (the "Agreement") demonstrating compliance with the terms and conditions of the Agreement by St. Joseph's Medical Center ("SJMC" or "St. Joseph's"). The effective date of the Agreement is noted on the front page of the recorded document as October 26, 2023, and the Agreement was recorded with the County Recorder on November 14, 2023. Several permits have been submitted and/or obtained through the general contractor, Layton Construction ("Layton"), and construction for Phase 1 (Administrative Support Building) will begin after final permit issuance from the City. The Administrative Support Building will be two stories, consisting of approximately 26,000 square feet. This building will house support offices as well as sleeping quarters for medical personnel.

A review of the terms by article of the Agreement is presented below.

1. **Articles 1 – 4:** these articles address definitions (Article 1); administrative matters such as representations and warranties (Article 2); effective date and term (Article 3); development of the property, including vested rights and the application of city regulations (Article 4). Except for Section 4.7, these articles do not give rise to questions of compliance.
 - a. **Section 4.7** (Agreement, page 20) requires approval of plans for relocation of public utilities at the time of submittal of final improvement plans. The Phase 1 work has not required relocation of any utilities. However, an Encroachment Permit (No. CN092625TO) was issued by the City related to future project tie-ins. Fees were paid in connection with the issuance of this permit, and SJMC is not aware of any issues related to the issuance of this permit..

2. **Article 5: Fees, Exactions, and Impact Fee Credits.** Section 5.1 Impact Fees provides that: “SJMC shall pay when due any and all fees charged by City for impacts from commercial (medical) uses and/or light industrial support buildings (as identified in Exhibit G and referred to collectively as the “Impact Fees”) that are in effect as of the Effective Date of this Agreement.” (Agreement, page 20). As of this date, SJMC has paid fees for the encroachment permit (see 1a); fire plan review and site plan review for the Administrative Support Building; Temporary Activity Permit for parking at the Grupe Temporary Parking Lot; application and plan check fees for the new North Tower; and application and plan check fees for the parking structure. SJMC also submitted plans for the dietary dock addition and a remodel to a respiratory therapy area to the State review agency (HCAI) and paid appropriate fees.

3. **Article 6: Financing and Public Improvements.** Except as noted below with regard to satisfaction of requirements for flood protection, the terms of this Article do not give rise to questions of compliance. The information provided below is a repeat of what was provided in the 2025 compliance report and will not be included next year.
 - a. **Section 6.5: Phasing of Required Improvements.** This section references “Phased Improvements” to include “the implementation of drainage improvements to achieve a 200-year Urban Level of Flood Protection in the existing below grade structure (i.e., as and when funding becomes available to finance this improvement.” (Agreement, page 23) SJMC conducted additional technical analysis regarding flood protection and submitted to the City “St. Joseph’s 200-year Floodplain Map Update,” prepared by Jacobs and dated June 3, 2024 (“Floodplain Map Update”). This analysis was peer-reviewed and accepted as edited by the City’s floodplain consultant, PBI Engineering. (See enclosed two emails from PBI’s Karl Brustad and City of Stockton’s John Schweigerdt, Exhibits 1 & 2 confirming PBI acceptance of the Floodplain Map Update.) This analysis also satisfied the requirement of Condition of Approval No. 16 on the Use Permit for the St. Joseph’s Medical Center Expansion, as confirmed by Nicole Moore via email on September 17, 2024. (See enclosed e-mail, Exhibit 3.) Therefore, no further flood improvements shall be required under this section of the Agreement and there has been full compliance with related requirements under this section of the Agreement.

4. **Article 7: Development Standards and Requirements.**
 - a. **Section 7.3** Community Benefit provides that SJMC shall satisfy the requirement for a ‘community benefit’ by...continuing the long-standing history of financial and in-kind contributions to programs and services that support and promote community health, with special focus on the underserved and vulnerable population of the City and surrounding communities.” (Agreement, page 25) SJMC continues to provide the financial and in-kind contributions to programs and services to the City and surrounding communities noted in the Agreement.
 - b. **Condition of Approval No. 16** requires SJMC to incorporate “floodproofing measures outlined in the Technical Memorandum [i.e., which was attached to Master Development Plan] or such other measures as may be presented by the applicant and agreed to by the City.” As noted above and previously reported, SJMC provided to the City the Floodplain Map Update, which was accepted by the City in full satisfaction of Condition of Approval No. 16.
 - c. **Temporary Parking:** SJMC has submitted an application and fee for a Temporary Activity Permit for the temporary employee parking lot located at E. Harding Way. On December 23, 2025, Community Development requested additional plans/drawings to illustrate plans/drawings internal circulation, configuration, lighting, access, and surfacing. This additional work is underway.
 - d. **Administrative Support Building:** SJMC has submitted plans for the Administrative Support Building to the City, has received comments from the City, and responded with revised plans on December 23, 2025. Final approval from the City and issuance of a building permit is pending.
 - e. **Parking Garage and North Tower:** The next phases of construction will include the new parking garage and North Tower. Plans for the parking garage have been submitted to the City, comments were received, and the design team is addressing the comments. Plans for the North Tower have not yet been submitted to HCAI.
5. **Article 8: Cooperation and Implementation. Section 8.3.1** pertains to timely submittal of complete applications: “SJMC shall use its best efforts to (i) provide to the City in a timely manner any and all documents, applications, plans, and other information necessary for the City to carry out its obligations hereunder; and (ii) cause SJMC’s planners, engineers, and all other consultants to provide to the City in a timely manner all such documents, applications, plans and other materials required under Applicable Law.” (Agreement, page 27)
 - a. The 2023 report on development agreement compliance described applications for a Parcel Merger and Parcel Map. The Parcel Merger was approved by the City and thereafter recorded on March 27, 2024, Document #2024-025148. The Parcel Map was approved by the City and thereafter recorded on October 28, 2024, Document # 2024-019756.

- b. Other plans submitted to the City have been described above. SJMC (through Layton) and the City have worked collaboratively on questions raised by the City staff.
- c. **Section 8.4 Mitigation Measures:** “SJMC shall comply with the mitigation measures in the MMRP, which reflect the mutually agreed-upon timing of specified improvements and SJMC’s pro rata share of funding, where applicable.” (Agreement, page 28) SJMC continues to comply with mitigation measures. Of note, as required by Mitigation Measure 4.4-4, coordination with the Calaveras Band of Mi-Wuk Indians is ongoing and SJMC and the Calaveras Band of Mi-Wuk Indians have negotiated an agreement for a monitor to be on-site during ground disturbing activities. It is expected that this agreement will be signed by both parties in the near future.

As required by Mitigation Measure 4.7-1, Parking Structure design includes conduit for Electric Vehicle Charging Stations to meet the minimum requirements of the 2022 California Green Building Standards Code 5.106.5.3, provides long-term bicycle storage facilities, includes exterior outlets, includes LED lighting. Parking structure design meets the requirements of the approved Master Development Plan.

- 6. **Article 9:** Third Party Legal Challenge, Indemnity, and Insurance. There have been no legal challenges, and no construction activities other than investigation/potholing activities have occurred that would encroach on the public right of way. Layton (general contractor) received an encroachment permit from the City, and this work has been completed. Layton also is aware of and has acknowledged the insurance requirements should such encroachment occur in the future.
- 7. **Article 10:** Annual Review provides that “...the City of Stockton Planning Commission shall review this Agreement and all actions taken pursuant to the terms of this Agreement with respect to the development of the Project every twelve (12 months) at a duly notice public hearing to determine good faith compliance with this Agreement (“Annual Review”). Specifically, the Annual Review shall be conducted for the purposes of determining good faith compliance with the terms and/or conditions of this Agreement, including compliance with mitigation measures in the MMRP. Each Annual Review shall also document the status of Project development. (Agreement, page 31)
 - a. This submittal demonstrates SJMC’s good faith compliance with this article of the Agreement.
- 8. **Articles 11 – 15:** these articles address mortgagee protection (Article 11); amendments to the Agreement (Article 12), assignment (Article 13); default, remedies and termination (Article 14); and miscellaneous provisions (Article 15). These articles, as with Articles 1 – 4 noted above, do not give rise to questions of compliance.

St. Joseph's Medical Center looks forward to continuing to work with the City as the construction phase of this expansion project begins. We have both an on-site project manager (Jeremy Massey, of the firm Jacobs) and representatives from Layton that are available to assist as issues may arise. I include their contact information below. Please also feel free to contact me if you have any questions or need additional information.

Sincerely,

Signed by:

C83F0728B9A04AE...

Alicia Howe

Chief Operating Officer Hospital Administration

Enclosures

Cc:

David Ziolkowski, President and CEO of St. Joseph's
Lori Asuncion, City Attorney
Michael McDowell, Assistant Director of Community Development
Martha Lofgren, Brewer Lofgren LLP
Jeremy Massey, Jacobs
Michael Blasingim, Layton Construction

Contact Information:

Jeremy Massey
Jacobs
(530) 771.7129
Jeremy.massey@jacobs.com

Michael Blasingim
Layton Construction
(615) 406.3302
mblasingim@laytonconstruction.com



COMMUNITY DEVELOPMENT DEPARTMENT
 345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Dan Keyser Chief Operating Officer Grupe Huber Company 1203 N. Grant Street Stockton, CA 95202	Grupe Commercial c/o Nelson Bahler 3255 W. March Lane Stockton, CA 95219	Grupe Commercial c/o Kevin Huber 3255 W. March Lane Stockton, CA 95219	The Stockton Center Site Authority c/o Office Of The Chancellor 401 Golden Shore, Second Floor Long Beach, CA 90802-4210 Attention: Executive Director
--	---	---	---

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: UNIVERSITY PARK (DA3-02)

Dear Mr. Keyser,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the University Park Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
 Senior Planner
 Community Development Department

Attachment:

1. 2024 Notification of Compliance

December 11, 2025

Anson K. Lihosit, AICP
Senior Planner
Community Development Department
City of Stockton
345 North El Dorado Street
Stockton, CA 95202

**RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: UNIVERSITY PARK
(DA3-02)**

Dear Mr. Lihosit:

This letter will serve as the Grupe Huber Company's annual reporting of its development on the University Park project as per DA3-02. For the calendar year 2025 the following results were achieved:

1. California State University Stanislaus commenced construction and completed a new two story 55,000sf classroom building with classes scheduled to commence sometime in early 2026.
2. KIPP University Park K-8 Charter School completed its final phase of construction consisting of 3 new buildings totaling 16,110sf of space. With the completion of this final phase, KIPP will be able to accommodate over 1,000 elementary students.
3. Grupe Huber Company completed a new lease with KIPP University Park for their proposed new High School, to be developed on a 3ac site within University Park. The proposed building will be two stories, approximately 50,000sf, and construction is estimated to commence in the middle of 2026 with an opening date for the '27/'28 school year.
4. Grupe Huber Company completed a short-term lease agreement with Common Spirit/St. Josephs Hospital on a site of approximately 12ac's, which will accommodate over 1,200 parking spaces for the hospital's staff, while they build a new multi-story parking structure on their hospital grounds and perform other remodeling and upgrades.

GRUPE HUBER COMPANY

1203 N. Grant Street | Stockton, CA 95202 | 209 490 2663

grupehuber.com



Attached is a summary representing the progress and development activities that have been accomplished within the University Park project since inception of the Development Agreement.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'DK' with a long horizontal stroke extending to the right.

Dan Keyser

Chief Operating Officer
GRUPE HUBER COMPANY
dkeyser@grupehuber.com
grupehuber.com



GRUPE HUBER COMPANY

1203 N. Grant Street | Stockton, CA 95202 | 209 490 2663

grupehuber.com

University Park Development Agreement Annual Review as of December 31, 2025

The purpose for this report is to summarize the results of the Grupe Huber Company (GHC), formerly The Grupe Commercial Company, as the Master Developer of the University Park project.

For background information, back in the late 1990's Fritz Grupe and Kevin Huber had been encouraging then President Marvalene Hughes to support growth of the CSU Stanislaus program offerings within the space they occupied within the CSUS Multi-Regional Center. When the City of Stockton and the CSU Chancellors Office decided to form a JPA and hire a private development partner to assist with the maintenance and development of the then CSUS Multi-Regional Center, the GHC was a perfect partner for this task. Fritz and Kevin developed a vision for University Park that included education as the central theme and other uses such as commercial, residential and nonprofits, that would be complimentary to the educational component and an asset to the surrounding community. As GHC worked on the various agreements and entitlements over the next two-year period, they were also hired to manage the site as an interim manager so activities and cost savings could commence. During the interim management period GHC assisted CSU in decommissioning the central steam plant, entered into an MOU with the City for security services and hired its own staff to start maintaining the buildings and grounds. These efforts alone saved the Site Authority (SA) and CSU hundreds of thousands in annual ongoing maintenance costs, which over the years is now in the millions.

We feel it is important to always list the main vision that Fritz and Kevin created back in 2000, since it has been GHC's guidelines to follow as it continues its efforts to complete such. Listed below are the main components of the Vision that the SA and CSU approved:

Mixed Use Community: education as the central theme; varied residential; medical; office; limited retail; nonprofits; cultural opportunities as part of the education.

A catalyst for gentrification of the Midtown. (embrace smart growth)

Project design parameters. (sense of arrival, consistent designs, emphasize landscape/campus feel, preserve historic fabric)

Safe pedestrian village. (secure working environment, encourage pedestrian activity, user friendly, public transportation)

In addition to adhering to the obligations contained within the various agreements and implementing the goals/vision of the MDP, GHC has also always kept the following additional goals in mind:

Manage the project more efficiently than in the past to realize cost savings.

Develop creative construction methods to reduce the cost of remodeling and new construction.

Create a project that is consistent with CSU Stanislaus's main campus in Turlock so the faculty and students feel the Stockton Center is a true extension of such.

Progress To Date Through 12/31/2025

Since taking over management in 2002 GHC has been adhering to the terms of all agreements for maintenance, development, reporting, leasing, etc. Listed below are the main items that have been accomplished:

Completed all agreements and City entitlements: EIR, MDP, DA, Security MOU, Ground Lease, Master Ground Sublease, Operations Agreement.

Providing necessary staffing levels to maintain the grounds and buildings in a first-class manner and in doing so realizing substantial cost reductions.

Abated haz mat and demolished 35 buildings representing over 467,000sf.

Installed a new signalized entrance off Harding/Grant Streets and several interior roundabouts and new private streets.

Installed new perimeter decorative wrought iron fencing with pilasters.

Installed new entrance monument signage, tenant monument and building signage and way finding signs.

Installed new underground utilities: gas, water, storm drainage, electric, data.

Installed a new 3.5-acre lake that serves as an amenity and for storm drainage retention/water quality.

Painted most of the existing buildings exteriors.

Installed new landscaping throughout and within each new development project.

Relocated CSUS from Weber into Acacia and have remodeled Acacia several times to accommodate CSUS's growth needs.

Installed a new parking lot for CSUS.

Installed site amenities such as the UPWPRG, One Mile Discovery Trail, new site furniture, owl boxes, murals, themed parking lot light banners, dolphin statue, EV charging units.

Coordinated the reburial of 41 grave sites discovered.

Remodeled 12 existing buildings totaling 236,950sf of space, several of which are historic.

Constructed 10 new buildings totaling over 319,253sf of space.

Have completed numerous leases and lease renewals, UP is currently home to 24 tenants of which 5 provide educational services to over 2,900 students with seamless education. 14 new development entities have been established. UP currently has over 1,000 employees on site.

GHC completed a major remodel of one of the historic buildings for its company headquarters.

GHC has received 5 awards from the City of Stockton thus far.

GHC has successfully secured relationships with various funding sources and currently has 9 loans with 3 different lenders.

Over \$220m will have been invested through the new development activities.

Conclusion

See attached master plan with notes and highlights.

Through GHC's efforts since 2001 over \$220m will have been invested into UP. UP is home to 24 tenants, over 1,000 employees and 2,900 students. GHC is managing and developing the project as required per the EIR, MDP and DA, with phased development, emphasizing education, completing transactions for the mixed-use project it was designed and approved to be, installing the required improvements for each new project, maximizing square footage while keeping the campus setting/park like atmosphere and rehabilitating existing historic buildings. Even during the swings in the economy over the years, GHC on average has completed one new transaction each year.



COMMUNITY DEVELOPMENT DEPARTMENT
345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Rosie A. Ruppel General Counsel A.G. Spanos Construction, Inc. 10100 Trinity Parkway, 5th Floor Stockton, CA 95219	The Spanos Family Partnership 10100 Trinity Parkway, 5 th Floor Stockton, CA 95219 Attention: Jerry Murphy	Gerald A. Sperry Of-Counsel 10100 Trinity Parkway, 5 th Floor Stockton, CA 95219	A.G. Spanos, as Trustee of the Alex and Faye Spanos Trust 10100 Trinity Parkway, 5 th Floor Stockton, CA 95219 Attn: Michael A. Spanos
--	--	---	--

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: WESTLAKE VILLAGES (DA1-04)

Dear Ms. Ruppel,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Westlake Villages Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP
Senior Planner
Community Development Department

Attachment:

1. 2024 Notification of Compliance

April 7, 2026

City of Stockton – Community Development Department
Attn: Anson K. Lihosit, Senior Planner
345 North El Dorado
Stockton, California 95202
Email: anson.lihosit@stocktonca.gov

**RE: PERIODIC REVIEW OF COMPLIANCE OF WESTLAKE AT SPANOS PARK
WEST DEVELOPMENT AGREEMENT**

Dear Anson:

This letter is submitted to the Planning Commission of the City of Stockton pursuant to the requirements of California Government Code Section 65865.1 and Code Section 16-192 and in accordance with Section 7.2 of the Westlake at Spanos Park West Development Agreement dated December 5, 2025.

OVERVIEW

The City of Stockton, a municipal corporation of the State of California (“City”) entered into that certain Westlake at Spanos Park West Development Agreement dated September 9, 2004 (the “Original Development Agreement”) by and between the City, The Spanos Family Partnership, a California general partnership (“Original Owner”), and A.G. Spanos, as Trustee of the Alex and Faye Spanos Trust under agreement dated January 27, 1998 (“Spanos”). The Original Development Agreement was recorded in the Official Records of San Joaquin County on October 26, 2004, as Document No. 2004-242808. The Original Development Agreement was subsequently amended by that certain Amendment to Westlake at Spanos Park West Development Agreement, dated June 29, 2010 (the Original Development Agreement, as amended by the foregoing, and further amended by Ordinance No. 2019-10-29-1501 is hereinafter referred to as the “Development Agreement”).

The real property which is the subject of the Development Agreement consists of all property south of Eight Mile Road, west of Spanos Park West, north of Disappointment Slough and east of Bishop Cut, more specifically (i) approximately 689.6 acres of property (“The Project”) adjacent to and south of Eight Mile Road, west of Spanos Park West, north of Disappointment Slough and east of Bishop Cut; and (ii) approximately 173.6 acres of property (referred to as “The Spanos Parcel” in the Development Agreement and now commonly referred to as “Crystal Bay”).

Westlake at Spanos Park West Periodic Review

April 7, 2026

Page 2

WESTLAKE

The Project consists of a residential development of approximately 2,800 detached single-family residential units (“Westlake”) and the Paradise Point Marina (“Paradise Marina”). Westlake is currently under development, as detailed below. The Paradise Marina is currently leased to a third-party operator and will be modernized or updated in accordance with the Master Development Plan at a later time.

Concurrently with entering into the Development Agreement with the City, the Original Owner and Spanos prepared and submitted for approval a vesting tentative map for Westlake. The Westlake Vesting Tentative Subdivision Map (“Westlake Tentative Map”) was approved by the City of Stockton Planning Commission on October 14, 2004, and filed on October 27, 2004. The Westlake Tentative Map was subsequently approved by the City of Stockton Community Development Director on January 13, 2005.

Following approval of the Westlake Tentative Map, the Original Owner prepared and submitted a final subdivision map entitled Westlake Villages, Unit No. 1 (Large Lot Map) – Tract No. 3357 (TM18-04 B) (“Westlake Final Map”). The Westlake Final Map was approved by the City Council of the City of Stockton per council resolution No. 06-0059 at the regularly held meeting on January 31, 2006. The Westlake Final Map was subsequently recorded on February 9, 2006, in Book 40 of Maps and Plats, Page 57, and amended by that certain certificate of correction was recorded in the Official Records of San Joaquin County on June 7, 2007, as Document No. 2007-106289.

The subdivision agreement associated with the Westlake Final Map was entered into by the City and Original Owner, as subdivider, on January 31, 2006 (“Original Subdivision Agreement”). The Original Subdivision Agreement was subsequently amended by (i) that certain First amendment to the Subdivision Agreement dated June 19, 2006 and recorded July 6, 2006, (ii) that certain Amended Subdivision Agreement dated June 29, 2010 and recorded October 10, 2010, and (iii) that certain First Amendment to the Amended Subdivision Agreement dated June 24, 2014 and recorded July 3, 2014 (the Original Subdivision Agreement, as amended, is hereinafter referred to as the “Subdivision Agreement”).

In accordance with the terms of Section 4.8 of the Development Agreement, the Original Owner and Spanos obtained such other permits and approvals from governmental or quasi-governmental agencies have jurisdiction over the Project as may be required. The Army Corps of Engineers 404 Permit for Westlake was obtained and approved on October 31, 2008. Since then, the appropriate pre-construction notifications have been supplied to the Army Corps of Engineers, and the Owner has received the Army Corps of Engineers’ Clean Water Act Section 401 Technically Conditioned Water Quality Certification. Further, the Owner has entered into a streambed alteration agreement with the California Department of Fish and Wildlife to mitigate the impact of the lake system, pump station, and underground storm drains for Westlake.

Westlake at Spanos Park West Periodic Review

April 7, 2026

Page 3

In 2006, following execution of the Subdivision Agreement, Original Owner sold large lots 1, 2, and 3 as identified on the Westlake Final Map (also referred to as Villages O, P, and Q, respectively) to third-party developers. Said developers entered into small lot subdivision agreements, processed small lot final maps for Villages O, P, and Q, and subsequently developed all of Village O consisting of 75 residential lots and 1 non-residential lot, Village P consisting of 91 residential lots and 1 non-residential lot, and Village Q consisting of 141 residential lots.

During the economic downturn, development of Westlake was put on hold by Original Owner and Spanos. The majority of the remaining land within Westlake was transferred from Original Owner to Stockton Westlake Investment, LLC, a California limited liability company (“Owner”) by way of a grant deed executed on September 12, 2014 and recorded December 31, 2014 in the Official Records under Recorder’s Serial Number 2014-135371 (“Westlake Grant Deed”). In accordance with Section 11.1 of the Development Agreement, Owner has assumed the obligations of Original Owner under the Development Agreement.

Since early 2019, 1,457 lots have been developed at Westlake Villages. As of the end of December 2025, 1,257 homes have been sold or occupied by new homeowners. All spine roads and infrastructure, including but not limited to, Westlake Drive, Scott Creek Drive, Regatta Lane and Eight Mile Road (including traffic signals and landscaped medians) have been installed and are complete and accepted by the City of Stockton. All underground wet and dry utilities and common area landscaping have been installed. All streets and utilities have been installed and accepted in all villages except for the remaining approximately 750 lots in Villages R through X. Villages R through X will be developed when Gill Pond Lane, Breakwater Circle and Lake 5 are installed at a future date.

Construction of the Recreation Center is complete and approved by the City of Stockton. The Recreation Center is open to Westlake homeowners and has been transferred to the Westlake Villages Recreation Center Association. The 11-acre Community Park is complete and “punch list” items required for opening to the public by the City of Stockton are being finalized. The Community Park property has been dedicated to the City of Stockton.

Lakes 1, 2, 3 and 4 are complete, and have been transferred to the Westlake Villages Master Association for management. Lakes 1 and 4 pump stations are complete and have been transferred to the Westlake Villages Master Association and the City of Stockton, respectively. The syphon line connecting Lake 2 to the pump on the Reclamation District 2042 Levee has been installed.

The Lodi Unified School District purchased Lot 5 of the Westlake Final Map, an 18.5-acre school site on the corner of Westlake Drive and Regatta Lane in 2021.

Westlake at Spanos Park West Periodic Review

April 7, 2026

Page 4

Phase 1 of Westlake Villages including Villages C, D & F consisting of 377 lots are complete and accepted by the City of Stockton. Villages C, D & F are developed and all homes are sold and occupied.

Phase 2 of Westlake Villages including Villages L, M & N consisting of 292 lots are complete and accepted by City of Stockton. Villages L, M & N are developed and all homes are sold and occupied.

Phase 3 of Westlake Villages consisting of Villages G, H, E, I & J were developed by Lennar Corporation. The Unit 1A Large Lot Final Map including Villages G, H, E, I & J and Lake 2 were approved by City of Stockton in Resolution No. 2021-09-28-1202 on September 28, 2021. Villages G, H & E include 277 lots. With the exception of 3 homes remaining to be sold in Village H, all the homes in Villages G, H & E of Phase 3 have been sold and transferred to homeowners. In Villages I & J, all finished lot improvements are installed and accepted by the City of Stockton. Eight models for two product lines that are available in Village I & J are open in Village I. Village I & J have the same lot configurations and offer two product lines of homes including interior lots and lots that back up to Lake 2. Of the 187 total lots in Villages I & J, 78 homes have been sold or occupied.

Phase 4 of Westlake Villages consisting of Villages A, B & K were purchased and developed by Lennar Homes. All of the lots in Villages A, B & K are developed and finished. Of the 324 lots in Villages A, B & K, 225 homes have been sold or occupied. The Small Lot Final Maps for Villages A, B & K have been recorded. Construction of Lake 3 (adjacent to Village K) is complete and two 72" connection pipes have been installed that will be connected to the lake in Crystal Bay at a future date.

Phase 5 of Westlake Villages will consist of approximately 750 lots in Villages R through X. Construction has not commenced on the remaining villages at Westlake. The Minor Amendment to the Westlake at Spanos Park West Master Development Plan, Project P25-0023 allowing conventional market-rate residential housing was approved on March 17, 2025 by the City of Stockton. Submittal of the revised large lot final map and small lot village maps for the remaining villages will take place when a builder has been selected. Improvement plans for the remaining spine roads (Breakwater Circle, Gill Pond Lane and Lake 5) will be submitted to the City of Stockton for plan check at a future date.

The Bike Path is installed on the Reclamation District 2042 Levee and accepted by the City of Stockton.

Parcel 18 included on the Westlake Final Map consisting of 2.21 acres located at the corner of Regatta and Eight Mile Road has been dedicated to the City of Stockton Fire Department.

Westlake at Spanos Park West Periodic Review
April 7, 2026
Page 5

CRYSTAL BAY

Crystal Bay is a planned residential community of 173.6 acres and approximately 1,343 residential units, designed with a variety of park and open space amenities. Crystal Bay is anticipated to include four types of residential products: traditional detached single-family, compact single-family residential, small lot courtyard detached residential and attached high density multi-family residential units.

In October 2024, the Development Agreement as it related to Crystal Bay was assigned to Dea Spanos Berberian, as Trustee of F. Spanos Nonexempt Trust FBO Dea Spanos Berberian established U/D/T dated January 27, 1998, and Dea Spanos Berberian, as Trustee of A. Spanos Nonexempt Trust FBO Dea Spanos Berberian, established U/D/T dated January 27, 1998 pursuant to that certain Partial Assignment and Assumption Agreement dated as of October 31, 2024, a copy of which is attached hereto as Exhibit "A". Future periodic reviews as they relate to Crystal Bay will be provided by the assignee.

Please contact us should you wish to discuss the status of any portion of the Project and Crystal Bay.

STOCKTON WESTLAKE INVESTMENT, LLC

By: 

Michael A. Spanos, Manager



CITY OF STOCKTON

COMMUNITY DEVELOPMENT DEPARTMENT

345 North El Dorado Street • Stockton, CA 95202 • (209) 937-8266 • Fax (209) 937-8893

December 5, 2025

Dea Spanos Berberian, as Trustee of F. Spanos Nonexempt Trust FBO Dea Spanos Berberian established U/D/T dated January 27, 1998, and A. Spanos Nonexempt Trust FBO Dea Spanos Berberian, established U/D/T dated January 27, 1998, 3520 Brookside Road, Suite #171 Stockton, CA 95219

Sheppard, Mullin, Richter & Hampton LLP
650 Town Center Drive, 19th Floor
Costa Mesa, CA 92626
Attn: Corey Steady
(714) 513-5100

Sheppard, Mullin, Richter & Hampton LLP
350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071
Attn: Justin Mahramas
(213) 617-4101

RE: 2025 ANNUAL DEVELOPMENT AGREEMENT REVIEW: WESTLAKE VILLAGES (DA1-04)

Dear Ms. Spanos Berberian,

Per state law (California Government Code, § 65865.1), Section 16.128.110.D of the Stockton Municipal Code (SMC) and the terms of the Crystal Bay project, portion of the Westlake Villages Development Agreement (DA): it is the duty of the applicant and/or the successor(s)-in-interest to provide evidence of good faith compliance with the agreement. This letter serves as notice to submit a compliance report for periodic review (at least once every 12 months), which updates the progress of the terms in the DA.

Your DA compliance report for periodic review must be submitted to Anson Lihosit, Senior Planner, by email or mailed to Anson Lihosit, Community Development Department, 345 N. El Dorado Street, Stockton, CA 95202. Once reports are submitted for all DAs, city staff will present a periodic review status and staff report to the City of Stockton Planning Commission for a compliance determination pursuant to SMC Section 16.128.110.B. The periodic review is tentatively scheduled to be presented to the Planning Commission in spring 2026. Please see last year's notification of compliance letter attached. (Attachment 1)

If you are no longer the current "Landowner" and have conveyed your interest, please provide the city with a copy of the recorded Assignment and Assumption Agreement, or else the city will continue to hold you responsible for the terms of the Development Agreement.

If you have any questions, please contact Anson Lihosit, Senior Planner, at 209-937-8316 or anson.lihosit@stocktonca.gov.

Cordially,

Anson K. Lihosit, AICP

Senior Planner

Community Development Department

Attachment:

1. 2024 Notification of Compliance

January 7, 2026

VIA EMAIL

Anson K. Lihosit, AICP
Senior Planner, Advanced Planning
City of Stockton
Community Development Department
345 N. El Dorado Street, Stockton, CA 95202
Email: Anson.Lihosit@stocktonca.gov

Re: Crystal Bay Development Agreement (DA1-04) Compliance Letter

Dear Mr. Lihosit:

This letter is submitted to the Planning Commission of the City of Stockton pursuant to the requirements of California Government Code Section 65865.1 and Code and Section 16.128.110.D of the Stockton Municipal Code and in accordance with Section 7.2 of the Development Agreement DA1-04 (the "Development Agreement"), and your request dated December 5, 2025.

Crystal Bay Property Holdings LLC, a California limited liability company ("Owner"), the owner of the property known as Crystal Bay (the "Property"), submits this letter regarding ongoing compliance with Development Agreement by the Owner with respect to the Property.

Crystal Bay is a planned residential community of approximately 173.6 acres of land, designed with a variety of park and open space amenities, in the City of Stockton (the "City"). For this development, the City approved the Development Agreement, the Vesting Tentative Map of Tract No. 3585, Subdivisions of San Joaquin County, Crystal Bay at Spanos Park West (the "Crystal Bay Tentative Map"). The Development Agreement with respect to Crystal Bay, the Vesting Tentative Map and associated approvals for Crystal Bay are scheduled to expire on January 10, 2040. Crystal Bay, the Crystal Bay Tentative Map, the rights under the Development Agreement for Crystal Bay, and associated approvals for Crystal Bay were transferred to Owner on or about November 24, 2025.

The Property has been improved with drainage pipes and equipment which are part of a surface water drainage system from the Property through the adjacent Westlake property to the nearby waterways. Those improvements have been completed and approved by the City of Stockton. The sanitary sewer lift station on the Westlake property that will also service the Property was completed and accepted by the City of Stockton. The storm drain pump station on parcel 9 that will service the Property has been completed and accepted by the City. The Scott Street Drive improvements were extended to the boundary of the Property, and the Owner contemplates that Scott Creek Drive will be extended through the Property from its boundary when the Property is developed to serve as a secondary access to the Property.

City of Stockton
January 7, 2026
Page 2

Owner (or predecessors) has discussed a revised preliminary concept plan with the Deputy Community Development Director with the City of Stockton which would facilitate the development of the Property in phases of residential units and multi-family residential units in accordance with the Development Agreement and to better reflect the current and future market conditions. We anticipate a formal submittal of the concept plan to follow in 2026.

Owner has not begun construction of residential units on the Property but continues to position the Property in order to commence the future development in accordance with the Development Agreement. The Property is currently being leased to a farmer for agricultural purposes under a lease that is terminable by Owner or the tenant.

Please contact us should you wish to discuss the status of this development agreement.

Sincerely,

Crystal Bay Property Holdings LLC,
a California limited liability company

By: Dea Spanos Berberian
Name: DEA SPANOS BERBERIAN
Title: CEO

SMRH:4908-5906-9313.6

cc: Mr. Alexandros Economou, Owner Representative
Mr. Michael McDowell, Assistant Director