

## California 4th Appellate District Court Confirms that Competitive Bidding is Not Required for K-12 Lease-Leaseback Construction Procurements

## Burke Education Law Alert

The California Court of Appeal in *Los Alamitos Unified School District v. Howard Contracting, Inc.* (2014) recently ruled that Education Code Section 17406 exempts K-12 school districts from obtaining competitive bids in lease-leaseback agreements for school property improvements.

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