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12	ETHICS COMMISSION
13	CITY AND COUNTY OF SAN FRANCISCO
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15	In the matter of Charges of EDWIN M. LEE, Mayor, SHERIFF ROSS MIRKARIMI'S OBJECTIONS TO MAYOR'S EXPERT
16	City and County of San Francisco WITNESS DECLARATION, AND
17	Against REQUEST FOR CROSS-ROSS MIRKARIMI, Sheriff, EXAMINATION
18	City and County of San Francisco
19	
20	Sheriff Ross Mirkarimi submits the following objections to the Mayor's Expert
21	Witness Declaration of Nancy Lemon, and requests cross-examination of William Lansdowne.
22	As to Ms. Lemon, we object to this witness declaration in its entirety, and move to
23	
24	strike it and the attached exhibits, as they are irrelevant to the issues before the Ethics
25	Commission.
26	Specifically, each one of the opinions rendered by Ms. Lemon on pp. 2-3 of her
27	declaration is irrelevant to this Commission's determination of whether Sheriff Mirkarimi
28	committed official misconduct. As to bullet point number iv on page three of the declaration,
	1 point number of the deciditation,

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Ms. Lemon lacks foundation to opine that "Sheriff Mirkarimi's crime relates directly to his duty as Sheriff to enhance public safety and reduce the incidence and severity of domestic violence."

Moreover, the declaration is replete with much of the same irrelevant and/or prejudicial information this Commission has already excised from many of the Mayor's fact witnesses. However, we believe that it would be a burdensome, time-wasting, and unnecessary exercise to go through the same kind of painstaking line-by-line analysis of this declaration as the Commission has already been forced to do with other declarations submitted by the Mayor. For this reason and the reasons stated above, we object to Ms. Lemon's declaration in its entirety.

By:

³ Dated: June 22, 2012

/<u>s/ David P. Waggoner</u> DAVID P. WAGGONER

> /s/ Shepard S. Kopp SHEPARD S. KOPP