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LEEANN PELHAM
EXECUTIVE DIRECTOR

Date: November 17, 2016

To: Members of the Ethics Commission

From: LeeAnn Pelham, Executive Director
Jessica Blome, Deputy Director

Re: **AGENDA ITEM 4 – Request from Beth Anderson for waivers from post-employment restrictions in San Francisco Campaign & Governmental Conduct Code sections 3.234(a)(1) and 3.234(a)(2)**

Summary: This memorandum provides an overview and Staff's recommendation regarding waiver requests received from Beth Anderson on November 10, 2016.

Action Requested: Staff recommends that the Commission not approve the waiver requests.

Waiver Requests

On November 10, 2016, the Ethics Commission received a written request for two waivers from Beth Anderson.¹ Ms. Anderson currently serves as a Deputy City Attorney on the City Attorney's Office (CAO) Real Estate and Finance Team, a position she's held for the past sixteen months. In January 2017, Ms. Anderson hopes to rejoin the law offices of Lubin Olson and Niewiandowski LLP (LON) as a member of its real estate team and affordable housing practice group.

Ms. Anderson states that LON represents non-profit affordable housing developers throughout California. Before she leaves City service, Ms. Anderson has requested that the Ethics Commission grant her two waivers: (1) regarding the permanent restriction on representation in particular matters, set forth in San Francisco Campaign and Governmental Conduct Code section 3.234(a)(1); and (2) regarding the one-year restriction on communicating with her former department, set forth in San Francisco Campaign and Governmental Conduct Code ("SF C&GCC") section 3.234(a)(2).

Ms. Anderson seeks waivers from the City's post-employment restrictions, so she may represent several non-profit affordable housing developers operating in the City. She would also like to continue working on projects with the Mayor's Office of Housing and Community Development (MOHCD). Ms. Anderson represented MOHCD for those projects while working

¹ See Attachment 1.

for the CAO. She states that granting these waivers will further the mutual interests of the City and LON's non-profit clients in developing and preserving affordable housing in San Francisco. She also states that the waivers will not confer any undue influence or unfair advantage. Both the CAO and the MOHCD have communicated support for Ms. Anderson's waiver requests.²

For the reasons discussed below, Staff recommends that the Commission deny both waiver requests. Ms. Anderson has been notified that this matter is on the Commission's agenda for the November 28, 2016, meeting and has indicated she will attend the meeting to address any questions the Commission may have.

Applicable Law and Policy

Policy Purpose of the City's Post-Employment Restrictions

As established in the Campaign & Governmental Conduct Code, "Government decisions of officers and employees of the City and County should be, and should appear to be, made on a fair and impartial basis." SF C&GCC § 3.200(e). The practice of former officers and employees communicating with their former colleagues on behalf of private interests "creates the potential for, and the appearance of, undue influence, favoritism, or preferential treatment." *Id.* Prohibiting former officers and employees "from communicating orally, in writing, or in any other manner with their former colleagues for specified periods of time will eliminate both actual and perceived undue influence, favoritism, or preferential treatment without creating unnecessary barriers to public service." *Id.*

This policy goal mirrors similar purposes for establishing revolving doors laws at the federal level:

One of the initial and earliest purposes for "revolving door" prohibitions was to protect the government against the use of proprietary information by former employees who might use that information on behalf of a private party in an adversarial type of proceeding or matter against the government, to the potential detriment of the public interest. As noted by the United States Court of Appeals in upholding the constitutionality of the "switching sides" prohibition first enacted in 18 U.S.C. § 207(a), "the purpose of protecting the government, which can act only through agents, from the use against it by former agents of information gained in the course of their agency, is clearly a proper one."³ Moreover, "[t]he restriction, against acting as agent or attorney for another in a matter in which the person participated personally and substantially as an officer or employee, is equally clearly a wholly rational means of pursuing that purpose." *Id.*

Another interest of the government in revolving door restrictions was to limit the potential influence and allure that a lucrative private arrangement, or the prospect of such an arrangement, may have on a current federal official when dealing with prospective private clients or future employers while still with the government, that is, "that the government employee not be influenced in the performance of public duties by the thought of later reaping

² Ms. Anderson advises she has obtained a notification from the City Attorney's Office, waiving any legal conflict of interest arising out of Ms. Anderson's prior representation of the City in any and all matters related to or arising out of the matters listed in her Exhibit A, and consent to that representation, so long as the matters do not extend to any litigation against the City.

³ *United States v. Arthur Nasser, et al.* 476 F.2d 1111 (7th Cir. 1973).

a benefit from a private individual.”⁴ In a case dealing with another federal statute which relates in part to potential future private employment of a current federal official,⁵ the court noted that the statutory scheme was intended to deal with the “nagging and persistent conflicting interests of the government official who has his eye cocked toward subsequent private employment.”⁶ Additional interests asserted in the proposed amendments to 18 U.S.C. Section 207 in the 99th and 100th Congresses were to prevent the corrupting influence on the governmental processes of both legislating and administering the law that may occur, and the appearances of such influences, when a federal official leaves his government post to “cash in” on his “inside” knowledge and personal influence with those persons remaining in the government.⁷ As noted in the postemployment regulations promulgated under the statute by the Office of Government Ethics, the provisions of the law and regulation are directed at prohibiting “certain acts by former Government employees which may reasonably give the appearance of making unfair use of prior Government employment and affiliations.”⁸

The policy goals behind revolving door laws continue to be in public focus at the federal, state, and local levels.⁹ In recent years, for example, the Obama Administration established new revolving door restrictions for officials serving in the Executive branch. California lawmakers have called for a strengthening of revolving door provisions at the state’s utility regulator.¹⁰ In Los Angeles, the City’s revolving door restrictions for former city officials was extended to apply to any city agency in which the former official served for two years prior to leaving City service.¹¹ In most recent headlines, the incoming Trump Administration is reportedly considering a five-year post-employment lobbying ban for its Executive Branch officials.¹²

Employees who wish to leave public service with the City and County of San Francisco to work for private organizations that have financial interests in City business enjoy comprehensive guidance from the City ethics laws. See SF C&GCC § 3.234. These broad rules were designed to fulfill the City’s stated goal to “eliminate both actual and perceived undue influence, favoritism, or preferential treatment . . .” that can result when private interests with a direct stake in a governmental matter hire former government officials through an unrestricted revolving door between public and private sector employment. SF C&GCC § 3.200(e). To that end, City law provides three restrictions:

⁴ “Post-Employment, ‘Revolving Door,’ Laws for Federal Personnel, Congressional Research Service, January 7, 2014 at <https://www.fas.org/sgp/crs/misc/R42728.pdf>.

⁵ 18 U.S.C. § 208, which prohibits, in part, a federal employee from taking any official action for the government on a matter in which a firm or organization “with whom he is negotiation ... prospective employment, has a financial interest ...”

⁶ *United States v. Conlon*, 628 F.2d 150, 155, n. 26 (D.C. Cir. 1980) (quoting CONFLICT OF INTEREST AND FEDERAL SERVICE, *supra* at 234).

⁷ See, generally, discussion in S.Rept. No. 396, 99th Cong., 2d Sess. (1986), and S.Rept. No. 101, 100th Cong., 1st Sess. (1987).

⁸ “Post-Employment, ‘Revolving Door,’ Laws for Federal Personnel, Congressional Research Service, January 7, 2014 at <https://www.fas.org/sgp/crs/misc/R42728.pdf> (citing 5 C.F.R. § 2637.101(c).

⁹ See e.g., <http://www.politico.com/story/2015/12/barack-obama-revolving-door-lobbying-217042>;

¹⁰ See <http://www.mercurynews.com/2015/03/21/puc-critics-cite-concerns-over-revolving-door/>

¹¹ See also <https://ww2.kqed.org/news/2015/10/15/in-sacramento-limits-are-few-on-revolving-door-between-government-and-private-jobs/>

¹² See <http://www.cnn.com/2016/11/16/politics/lobbying-donald-trump-washington-swamp-transition/index.html>

- Former City employees are prohibited from participating in any matter where the City is a party or has a substantial interest or in which the former officer or employee participated personally and substantially. Part (A)(1) of SF C&GCC § 3.234;
- Former employees are prohibited from communicating with their former departments “with the intent to influence a government decision” after separating from the City for a one-year period—known as a “cooling off” period. Part (A)(2) of SFC&GCC § 3.234;
- Former employees are prohibited from going to work for City contractors for one year after separating from the City. Part (A)(3) of SFC&GCC § 3.234 (Part (B) of that section provides further restrictions for employees who worked for the Mayor, Board of Supervisors, and their senior staff members).

Post-Employment Restrictions

1. Permanent Restriction on Certain Activities

Section 3.234(a)(1) of SF C&GCC provides the following restrictions:

(A) No former officer or employee of the City and County, after the termination of her or her service or employment with the City, shall, with the intent to influence, act as agent or attorney, or otherwise represent, any other person (except the City and County) before any court, or before any state, federal, or local agency, or any officer or employee thereof, by making any formal or informal appearance or by making any oral, written, or other communication in connection with a particular matter:

- (i) in which the City and County is a party or has a direct and substantial interest;
- (ii) in which the former officer or employee participated personally and substantially as a City officer or employee; and
- (iii) in which involved a specific party or parties at the time of such participation.

(B) No former officer or employee of the City and County, after the termination of her or her service or employment with the City, shall aid, advise, counsel, consult or assist another person (except the City and County) in any proceeding in which the officer or employee would be precluded under Subsection (A) from personally appearing.

(C) The prohibitions in Subsections A and B do not prohibit a former City officer or employee from testifying as a witness, based on the former officer’s or employee’s personal knowledge, provided that no compensation is received other than the fees regularly provided for by law or regulation of witnesses.

2. One Year Restriction

SF C&GCC section 3.234(a)(2) provides the following one-year restriction on certain communications:

No current or former officer or employee of the City and County, for one year after termination of her or her service or employment with any department, board, commission, office or other unit of the City, shall, with the intent to influence a government decision, communicate orally, in writing, or in any other manner on behalf of any other person (except the City and County) with any officer or employee of the

department, board, commission, office or other unit of government, for which the officer or employee served.

Waiver Considerations

Pursuant to SF C&GCC section 3.234(c), the Commission may waive the restrictions in sections 3.234(a)(1) and 3.234(a)(2) if the Commission determines that granting a waiver would not create the potential for undue influence or unfair advantage. The Commission shall not approve any request for a waiver from the bans made under subsection 3.234(c)(1) unless the Commission makes a finding that granting such a waiver would not create the potential for undue influence or unfair advantage. EC Regulation 3-234-4(a)(4).

Ethics Commission Reg. 3.234-4(a)(4) provides that in making its determination whether granting a waiver would create the potential for undue influence or unfair advantage, the Commission may consider:

- the nature and scope of the communications the individual will have with her former department,
- the subject matter of such communications,
- the former position held by the employee,
- the type of inside knowledge that the individual may possess, and
- any other factors the Commission deems relevant.

Discussion

Permanent Restriction Waiver Request - SF C&GCC section 3.234(a)(1)

Ms. Anderson seeks a waiver from section 3.234(a)(1) for reasons similar to those in a waiver request considered by the Ethics Commission earlier this year. In January, former Deputy City Attorney Evan Gross requested a waiver from SF C&GCC section 3.234(a)(1)'s prohibition on representing future clients in matters for which the City has a direct or substantial interest. The Commission granted Mr. Gross's waiver request as to representation of future clients in non-litigation matters for which the City has a direct or substantial interest. Ms. Anderson seeks a waiver from section 3.234(a)(1) for similar reasons. Like Mr. Gross, Ms. Anderson works for the City Attorney's Office (CAO) where she represents the Mayor's Office of Community Housing Development (MOHCD) in real estate transactions for the development of City property into affordable housing projects. Also like Mr. Gross, Ms. Anderson hopes to leave City service to join a law firm, in this case her prior employer, to represent the developers benefiting from MOHCD's affordable housing program to complete the transactions on which she worked as Deputy City Attorney. Unlike Mr. Gross, Ms. Anderson only asks for permission to work on four projects, which are listed on Exhibit A to her waiver request.

1. Nature and scope of communications

As highlighted above, for one year after separating from City service, City law would restrict Ms. Anderson from acting as an agent or attorney, or otherwise representing any other person with the intent to influence a government decision in which she has "participated personally and substantially" as a city officer or employee. SF C&GCC § 3.234(a)(1)(ii). EC Regulation 3.234-5(e) defines "participate personally" as "to participate directly," which includes the participation of a subordinate. EC Regulation

3.234-5(e) defines “participate substantially” as the officer’s or employee’s involvement is, or reasonably appears to be, significant to the matter. Moreover, “participate substantially” relates not only to the effort devoted to a matter, but also to the importance of the effort. EC Regulation § 3.234-5(e). The single act of approving or participating in a critical step may be substantial. EC Regulation § 3.234-5(e).

We understand that Ms. Anderson represented MOHCD as a real estate attorney on certain projects. As a real estate attorney with LON, she hopes to represent that law firm’s developer clients to finalize those same transactions. There can be no doubt that an attorney’s legal participation in and approval of real estate transactions is critical to a project’s success. Staff, therefore, concludes that Ms. Anderson has participated personally and substantially in MOHCD’s projects and would continue to do so for private clients regarding the same transactions.

2. Subject matter of communications

As highlighted above, City law also prevents Ms. Anderson from acting as agent or attorney, or otherwise representing, any other person with the intent to influence a government decision in which the City and County is a party or has a direct and substantial interest. SF C&GCC § 3.234(a)(1)(i). According to the EC Regulations, the City has a “direct and substantial interest in a particular matter” if the City is the subject of the proceeding or transaction or would be significantly affected by the result of the proceeding or transaction. EC Regulation 3.234-5(b). EC Regulation 3.234-5(d) further defines “particular matter” as one that “involves a specific proceeding affecting the legal rights of parties or an isolated transaction or related set of transactions between identifiable parties such as contracts, grants, applications, requests for rulings, litigation, or investigations. Rulemaking, legislation, the formulation of general policy, standards or objectives, or other actions of general application are not particular matters.”

All parties acknowledge that the City has a direct and substantial interest in the successful development of real property it owns and for which it subsidizes affordable housing projects.

3. Former position

In her current position with the City Attorney’s Office, Ms. Anderson’ primary role is to represent the MOHCD on affordable housing real estate transactions. She stated that she did not participate in proceedings or adjudicatory hearings and she was the only transactional attorney at the City Attorney’s Office working on behalf of MOHCD. She stated that, in her position, she has frequently communicated with non-profit developers and their attorneys who were working with MOHCD, including, but not limited to, JSCO, DGI, Hunters Point Affordable Housing, Inc., BRIDGE, Bernal Heights Neighborhood Center, and the Mission Economic Development Agency. These entities are all current clients of Ms. Anderson’s prospective employer, LON. Ms. Anderson’s work on these projects will not change substantially, but as an attorney, her client will switch from the financier to the financee. To alleviate this actual—as opposed to perceived—conflict of interest, the CAO is purportedly signing a waiver granting Ms. Anderson informed consent to represent a former adversarial party in the subject real estate transactions.

4. Type of knowledge possessed

Ms. Anderson stated that her understanding and experience would facilitate the transactions and that she would be able to share her institutional knowledge at the City Attorney's Office with her successors. According to Ms. Anderson, she seeks the waivers in order to communicate and work on transactional matters related to affordable housing in San Francisco and not for court proceedings or administrative hearings. From the information she has provided, it appears Ms. Anderson will be participating in ongoing transactions where she had previously been representing the City. As a former City employee with unique inside knowledge, Ms. Anderson may be or appear to be in the position of creating the potential for undue influence or unfair advantage on her new employer's behalf to the extent that she proposes to now communicate the interests of private parties to her former agency colleagues in matters that remain pending with that agency.

5. Other considerations

The Ethics Commission's Regulations Related to Conflicts of Interest (EC Regulations) state that section 3.234(a)(1) restricts only specific activities of former City and County officers and employees, not their employment *per se*. See EC Regulation § 3.234-4(a)(4). Ms. Anderson seeks relief from the post-employment restriction, so she can represent private developers in four matters where the City has a direct and substantial interest. Staff confirmed with Ms. Anderson that those four matters are not the only matters on which she will work as a part of the LON law firm. Therefore, Ms. Anderson's ability to continue working on these four projects does not preclude her from accepting the position with LON.

6. Additional background

For reference, the Ethics Commission has considered three previous waiver requests regarding the permanent restriction in SF C&GCC section 3.234(a)(1).

In October 2006, the Commission granted a waiver request from Rio Foster, a former staffer of the Mayor's Office of Economic and Workforce Development, permitting her to contact the Mayor's Office regarding her work at the Bid Committee for the 2016 Olympics. In September 2011, the Commission granted a waiver request from Thomas Long, a former Deputy City Attorney. In that matter, Ms. Long, a former Deputy City Attorney, left City employment and became the Legal Director of TURN, a non-profit organization. At the time of her request, Ms. Long had not yet obtained a waiver from the CAO regarding her representation of specific clients. At that time, Commission staff recommended that the Commission grant a waiver because of a general mutuality of interests between the City and TURN in their advocacy efforts before the California Public Utilities Commission on behalf of utility customers.

In November 2011, the Commission considered a waiver request from Tiffany Bohee, a former member of the Office of Economic and Workforce Development. Ms. Bohee left her position to serve as the Interim Executive Director of the San Francisco Redevelopment Agency, another governmental agency. The Commission granted Ms. Bohee's waiver request in order for her to continue her involvement in a legislative package that she anticipated would be presented to the Board of Supervisors and the Mayor for their approval.

In January 2016, the Commission considered a waiver request from Evan Gross, another Deputy City Attorney, who went to work for a law firm that represented developer clients engaged in ongoing real estate transactions with MOHCD. By a vote of 4-1, the Commission granted a limited waiver for the permanent post-employment restriction in SF C&GCC section 3.234(a)(1) regarding non-litigation matters.

One-year Restriction Waiver Request - SF C&GCC section 3.234(a)(2)

So that she may represent her law firm's clients in connection with particular ongoing transactions, Ms. Anderson also seeks a waiver from the one-year restriction in SF C&GCC section 3.234(a)(2) on communicating with her former department with intent to influence a government decision. Ms. Anderson's primary argument in favor of her waiver request is that her future client's interests are aligned with those of the City, so she sees no potential for undue influence. Staff disagrees. Over the course of the next year, the City and developer's interests may diverge for myriad reasons, including uncertain economic conditions, increasing interest rates, neighborhood opposition, or political discord. Ms. Anderson's unique former position and relationship with former MOHCD clients could give rise to an unfair advantage over developers who do not share her connections. Staff recommends that Ms. Anderson should follow the established post-employment restriction and refrain from communication with her former department "with intent to influence a government decision" during the one-year post-employment period. *See SFC&GCC § 3.234(a)(2).*

Since 2010, the Commission has considered seven waiver requests regarding the one-year restriction on communication in SF C&GCC section 3.234(a)(2). Five requests were granted and two were not granted. The Commission granted limited post-employment waivers to the restriction in three cases.

In February 2012, for example, the Commission considered a waiver request from Robert Selna, a former aide to then Supervisor Mirkarimi. Ms. Selna had not delineated what communications she would have and did not identify which City agencies she would contact. The Commission believed the request was premature, as she had not provided information regarding a position she had accepted. The Commission advised Ms. Selna to return once she had more information.

In January 2016, the Commission considered a waiver request from Evan Gross, another Deputy City Attorney, who went to work for a law firm that represented developer clients engaged in ongoing real estate transactions with MOHCD. By a vote of 4-1, the Commission denied a waiver for the one-year post-employment restriction in SF C&GCC section 3.234(a)(2).

Recommendation

Staff finds that Ms. Anderson's representation of developer clients at LON with matters pending before the Mayor's Office of Housing and Community Development, her former client, would create the potential for undue influence and unfair advantage. For the reasons discussed above, Staff recommends that the Ethics Commission deny Ms. Anderson's waiver requests from the restrictions in SF C&GCC section 3.234(a)(1) and 3.234(a)(2). Ms. Anderson should be prohibited from representing private clients on matters for which she previously represented the City.

Attachments:

- Waiver requests from Beth Anderson
- E-mail from Charles Sullivan, Office of the City Attorney
- E-mail from Kate Hartley, Mayor's Office of Housing and Community Development
- City Attorney's Office Informed Consent Letter (forthcoming)

From: Beth Anderson
To: [Pelham, LeeAnn \(ETH\)](#)
Cc: [Shen, Andrew \(CAT\)](#); [Blome, Jessica \(ETH\)](#); [Sullivan, Charles \(CAT\)](#); [Lee, Olson \(MYR\)](#); [Hartley, Kate \(MYR\)](#)
Subject: Request for Waivers
Date: Thursday, November 10, 2016 3:21:14 PM
Attachments: [ESA Waiver Request 10 November 2016 signed.pdf](#)

Dear Ms. Pelham,

Many thanks to you and Jessica for your time this morning. As discussed, please find attached my signed request for waivers of Campaign and Governmental Conduct Code Sections 3.234(a)(1) and (a)(2) for consideration at the November 28, 2016 Commission meeting.

Please do not hesitate to let me know if you have any questions or if I can provide any further information to assist in your review.

Thank you,
Beth

Beth Anderson
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Tel: 415-554-4687
Fax: 415-554-4757
email: Beth.Anderson@sfgov.org

This email may contain privileged or confidential information. If you are not the intended recipient, please reply to this email to inform me of your receipt and then destroy all copies. Thank you.

From: [Pelham, LeeAnn \(ETH\)](#)
To: [Blome, Jessica \(ETH\)](#)
Subject: FW: Support for Beth Anderson's Waiver Request
Date: Monday, November 14, 2016 11:10:32 AM

From: Hartley, Kate (MYR)
Sent: Friday, November 11, 2016 12:13 PM
To: Pelham, LeeAnn (ETH) <leeann.pelham@sfgov.org>
Subject: Support for Beth Anderson's Waiver Request

Dear Ms. Pelham:

I am writing to express my support for Deputy City Attorney Elizabeth (Beth) Anderson's request for a waiver of Subsections (a)(1) and (a)(2) of Section 3.234 of the Campaign and Governmental and Conduct Code. I believe that granting these waivers will help MOHCD produce affordable housing efficiently and effectively, and will not create adverse outcomes for MOHCD.

Ms. Anderson has specifically requested that these waivers apply to her potential work on the projects listed below, since the developers of these projects are currently clients of the firm to which she may transfer, Lubin Olson and Niewiandomska LLP:

- Hunters View HOPE SF; Developers: JSCO, DGI, Ridge Point, and Hunters Point Affordable Housing, Inc.
- Seawall 322-1, aka 88 Broadway and 735 Davis; Developers: BRIDGE and JSCO

RAD Phase II:

- Alemany (Cluster 5); Developers: BRIDGE and Bernal Heights Neighborhood Center
- 3850 18th Street (Cluster 6); Developers: BRIDGE and Mission Economic Development Agency
- Mission Dolores (Cluster 6); Developers: BRIDGE and Mission Economic Development Agency
- 1760 Bush (Cluster 7); Developers: JSCO and DGI

The requested waivers for these projects are important because Beth's continued work on them will preserve complicated, detailed, and specialized knowledge that will allow the projects to continue with efficiency. We know this to be true because of the long-standing collaborative relationship MOHCD has had and will continue to have with the developers listed. As is the case in most all localities across the country that develop affordable housing with complex financial structures, the public lender and developer begin the process with the mutual, non-market-oriented goal of providing housing with rent levels that don't support a market-rate return or typical developer profit. The work is mission-driven, but highly complex. Having attorneys representing both parties (MOHCD and the development team) who understand the unique financing rules and regulatory constraints is essential to getting the job done. We are not in conflict with our developer partners and their attorneys; we mutually seek to achieve the best outcome possible: quality, cost-effective

housing that conforms with all applicable regulations and public funding requirements.

We are hopeful that you grant the requested waivers in order to ensure that our developer partners have the quality and knowledgeable representation that we know Beth will provide. This representation will enhance, not detract from our negotiations and project work.

Please do not hesitate to contact me if you have any questions about this recommendation.

Thank you.

Kate Hartley

Kate Hartley
Deputy Director – Housing
Mayor’s Office of Housing and Community Development
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From: [Pelham, LeeAnn \(ETH\)](#)
To: [Blome, Jessica \(ETH\)](#)
Subject: FW: Beth Anderson Waiver Request - November 28, 2016
Date: Tuesday, November 15, 2016 4:21:32 PM

From: Charles Sullivan [mailto:Charles.Sullivan@sfgov.org]
Sent: Tuesday, November 15, 2016 4:21 PM
To: Pelham, LeeAnn (ETH) <leeann.pelham@sfgov.org>
Subject: Beth Anderson Waiver Request - November 28, 2016

Dear Ms. Pelham,

I was Beth Anderson's supervisor during the time that she worked in the City Attorney's Office. After consulting with MOHCD, the City Attorney's Office supports Beth's request for waivers of Campaign and Government Conduct Code Sections 3.234(a)(1) and (a)(2). Please do not hesitate to call me or write to me if I can be of any assistance or answer any questions in furtherance of Beth's request.

Thanks in advance for your consideration, Charles

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