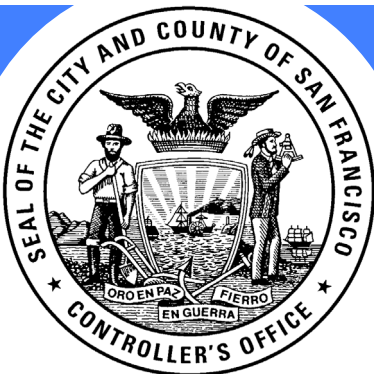


Public Integrity Review

Preliminary Assessment:

Department of Building Inspection's
Permitting and Inspections Processes



CITY & COUNTY OF SAN FRANCISCO

Controller's Office

September 16, 2021

Assessment Summary

The Controller's Office (Controller) issues this preliminary assessment of the permitting and inspections* processes of the Department of Building Inspection (DBI) based on a limited survey of San Francisco properties, including 555 Fulton Street (Fulton) and 2867-2899 San Bruno Avenue (San Bruno), with known irregularities in plan review and/or inspections as identified by the federal complaints against Mohammed Nuru, Rodrigo Santos and Bernard Curran. This assessment is informed by the findings of the Controller's joint Public Integrity investigation with the City Attorney's Office (City Attorney) and identifies generally applicable risk areas in DBI's processes where improper preferential treatment can occur.

DBI senior management reports that it has launched departmental reforms and begun an internal audit to identify, review, and remediate potential issues resulting from improper preferential treatment afforded during the tenure of former DBI Director Tom Hui. This preliminary assessment does not review DBI's remediation efforts. Rather, it focuses on measures DBI should take to ensure an ethical culture and promote ethical compliance in the future.

* This review focused on building inspection processes and did not review electrical or plumbing inspection processes. DBI should conduct additional reviews that cover the remainder of its inspection processes.

Assessment Summary – Preliminary Findings

Our assessment identifies the following significant weaknesses in the department's systems, processes, and controls needed to reduce the risk of fraud or inappropriate activities:

- The department's permitting and inspection system lacks system controls to ensure completed data is entered into the system and to prevent inappropriate after-the-fact changes to recorded inspection records. Other review and inspection milestones and policies to manage such changes are uneven and inadequately monitored.
- The department does not make use of available data to track, monitor, and investigate certain "red flag" activities, such as out-of-area inspections, inappropriately expedited review of project plans, or approvals by those without proper authorization to do so.
- Review and investigation of complaints or higher-risk activities is not standardized across the department, and in some cases inappropriately assigned to units to review their own initially-performed work.
- Financial penalties for non-compliance with code appear in some cases too low and do not provide an adequate incentive to adhere to City-established requirements.
- These internal control weaknesses, combined with a pattern of poor ethical management under the former director, sustained a negative "tone at the top" during his tenure.

Assessment Summary – Recommendations

This assessment makes preliminary recommendations to the Building Inspection Commission (BIC) and DBI to:

- Foster an ethical organizational culture by ensuring there is an ethical tone at the top and by promoting adherence to ethics disclosure and conduct laws.
- Create a strong reporting and compliance program to identify risks and ensure consistent enforcement of its robust ethical rules and policies.
- Ensure public transparency, consistency, and adequate internal controls in the recording and modification of data in its records.
- Use existing data to conduct monitoring that will help identify fraud and abuse risks.
- Consider requiring plan reviewers and inspectors to certify compliance with city conflict-of-interest rules to deter bribery, nepotism, and favoritism.
- Provide more public outreach and education on its internal permitting and inspection requirements and processes to help the public identify proper and improper practices when they interact with the department.

This report, the Controller's seventh stemming from the joint Public Integrity investigation, is designed to provide transparency into the overarching investigative findings at DBI and provide general recommendations for reform at DBI to prevent nepotism, cronyism, and corruption in the future. This assessment is offered for public comment and review and may be revised as our work continues. More assessments of other internal control processes may be released as our Public Integrity Review progresses.

Federal Criminal Charges and Resignations Related to Mr. Nuru, Mr. Hui, and Former City Employees and Contractors

In January 2020 former Public Works Director **Mohammed Nuru** was criminally charged with a scheme to defraud the City and County of San Francisco (City) of his honest services by providing official action in exchange for bribes. Among other charges, the complaint alleges that Mr. Nuru and former DBI Director **Tom Hui** accepted meals from the developer of 555 Fulton Street (555 Fulton), **Li Zhang**, and the project's permit expediter, **Walter Wong**.

In response to those criminal charges, the City Attorney's Office (City Attorney) and Controller's Office launched a joint investigation into public corruption identified in the criminal complaint. While the City Attorney's Office focused on employee and contractor wrongdoing across multiple departments, the Controller's Office undertook a Public Integrity review of city contracts, purchase orders, and grants to identify red flags possibly indicating process failures. The Controller's Office also created a Public Integrity Tip Line to facilitate the anonymous reporting of any information it might receive regarding the joint Public Integrity Investigation.

Since January 2020 the U.S. Attorney's Office has criminally charged 13 additional city employees and contractors of the City. As a result of these criminal investigations and the City Attorney's ongoing investigations, several city department heads and senior officials have been released or resigned from city service, some city contractors and their principals have been [suspended from city contracting](#), and the City's residential refuse collector, Recology, and Mr. Wong have agreed to pay significant restitution to ratepayers and taxpayers.

Mr. Wong's Plea and Cooperation

Mr. Wong was criminally charged on June 23, 2020, with conspiracy to commit honest services fraud and conspiracy to commit money laundering. The conspiracy alleged that Mr. Wong conspired with Mr. Nuru and other, unnamed city officials.

On July 6, 2020, Mr. Wong pled guilty and agreed to cooperate with the federal investigation.

In June 2021 Mr. Wong and the City reached settlement under which Mr. Wong and entities controlled by Mr. Wong agree not to do business with the City or act as a permit expediter at DBI for five years, the maximum debarment period allowed under city law. The document also states that Mr. Wong agrees to pay significant restitution to the City for contracts he or his company obtained through bribery and cronyism and agrees to pay more than \$300,000 to the City for ethics violations.

Additional Criminal Charges Related to DBI

Independent of Mr. Wong's wrongdoing, three other people have been criminally charged with fraud related to their conduct at DBI:

- **Bernard Curran**, a former DBI senior building inspector.
- **Rodrigo Santos**, a licensed engineer and former Building Inspection Commission president.*
- **Peter Schurman**, an engineering technician who was not a city employee.

As further described below, these criminal complaints, along with City Attorney findings and publicly available information, demonstrate that former DBI officials gave certain project sponsors improper preferential treatment by expediting project review and/or overlooking legal violations.

* The Building Inspection Commission oversees DBI.

City Attorney's 2018 Suit Against Mr. Santos

In March 2018 DBI identified irregularities in payments Mr. Santos made to DBI and notified the Controller's Office about its concerns. After an investigation, the City Attorney sued Rodrigo Santos, Peter Schurman, and others for fraud related to several construction projects in San Francisco. The lawsuit alleges that Mr. Santos, his firm at the time, Santos & Urrutia Associates, Inc., and his associates circumvented state and local laws designed to protect the safety of workers and the public by:

- Performing excavation work that exceeded the scope of the permitted work.
- Misappropriating professional stamps of licensed engineers to fraudulently certify special inspections required for final approvals of certain projects.

In early 2020 the City amended its lawsuit to add allegations that Mr. Santos stole more than \$400,000 from his clients but not that any DBI official was complicit in this alleged fraud.

In May 2020 the U.S. Attorney's office charged Mr. Santos with defrauding his clients and obstructing justice. The investigation found that Mr. Santos fraudulently deposited to his personal bank account checks totaling \$766,412.90. The City's civil lawsuit against Mr. Santos and Mr. Schurman was stayed pending resolution of criminal charges against them. As described later in the report, in August 2021 additional criminal charges were filed against Mr. Santos alleging a scheme to bribe Mr. Curran.

Public Findings of Mr. Hui's Improper Preferential Treatment

In 2013 Mayor Edwin Lee appointed Mr. Hui as DBI director. While the department head, Mr. Hui received annual ethics training and filed the required annual Statements of Economic Interest (Form 700s).

On March 10, 2020, the City Attorney released a report finding that former DBI Director **Mr. Hui**: (1) provided improper preferential treatment to Mr. Wong's client, Li Zhang, the developer of 555 Fulton; (2) accepted meals from Mr. Wong and the developer, both restricted sources for Mr. Hui; and (3) abused his official position to help his son and his son's girlfriend obtain city jobs.* Mr. Wong is alleged to have been a close friend and supporter of former Mayor Lee.**

On March 10, 2020, Mayor London Breed asked the Building Inspection Commission to remove Mr. Hui. Mr. Hui resigned on March 11, 2020.

* [City Attorney's Report](#) regarding Mr. Hui, March 10, 2020.

** [Criminal complaint against Harlan Kelly](#), November 25, 2020.

Public Records Demonstrate Conflicts of Interest by Former DBI Employees

In May 2021 DBI placed Mr. Curran on leave pending an investigation into alleged conflict of interest violations. Public records show that Mr. Curran borrowed \$180,000 from Freydoon Ghassemzadeh on March 21, 2017. Publicly available DBI records also show that during the life of the loan, Mr. Curran inspected projects at properties owned by Mr. Ghassemzadeh. Contrary to law, Mr. Curran did not disclose the loan on any Form 700 that he initially filed, but did so on May 20, 2021 by amending an already filed Form 700. Mr. Curran resigned from DBI on June 15, 2021.

Public records also show that a former DBI employee who has not been named publicly and is no longer employed at DBI also owed Mr. Ghassemzadeh a significant amount of money when this employee was still employed by the department and was reviewing plans submitted to obtain permits for work at properties Mr. Ghassemzadeh owned.

DBI records show that Mr. Ghassemzadeh's son, Bahman Ghassemzadeh, was a project sponsor for the work at these properties. In February 2018 the BIC appointed Bahman Ghassemzadeh to the Board of Examiners, from which he resigned in June 2021 in the wake of media coverage about his father's loan to Mr. Curran.*

* The [Board of Examiners](#) is a group of 13 experts created under Section 105.1 of the San Francisco Building Code to hear and make determinations by members of the public requesting clarification on the safety and use of new materials, new methods, or types of construction, and to provide interpretation of the San Francisco Building Codes.

Federal Charges Against Mr. Curran and Additional Charges Against Mr. Santos

In August 2021 the U.S. Attorney's office filed additional criminal charges against **Mr. Santos** and **Mr. Curran** for committing honest services wire fraud. The U.S. Attorney's investigation found that Mr. Santos allegedly solicited donations from his clients to make charitable contributions to the San Francisco Golden Gate Rugby Association, for which Mr. Curran had an affinity, in exchange for Mr. Curran giving favorable official treatment to Mr. Santos's clients. To do this, Mr. Curran allegedly exploited his authority to unilaterally assign himself inspections of projects belonging to Mr. Santos's clients. This alleged scheme disregarded DBI guidance and procedure, which states that when inspectors are not available to conduct inspections in their own districts, an "Inspection wheel" should be utilized to assign an alternative inspector. If this wheel had been used, Mr. Curran likely would not have been assigned to these properties.

The improper preferential treatment that Mr. Curran allegedly provided included:

- Conducting inspections and providing approvals at projects of Mr. Santos's clients before completion of the work needed to comply with the permit.
- Inspecting work at projects outside of his assigned district, where either another senior building inspector or their subordinate should have performed the inspection.

Federal Charges Against Mr. Curran and Additional Charges Against Mr. Santos *(continued)*

Specifically, Mr. Curran:

- Approved final inspections of work when:
 - A sprinkler system in an accessory dwelling unit had not been installed, contrary to what the permit required.
 - Work to remove unauthorized walls was not completed but was recorded as abated (resolved).
- In coordination with Mr. Santos, manipulated an inspection assignment to delay the inspection so that Mr. Curran could inspect the work himself on a later date.
- Recorded an inspection in DBI records although it was not conducted.

City Attorney and DBI Investigations Reveal Favoritism in Both Plan Review and Inspection

DBI management is conducting its own review of properties with potential life/ safety issues, including 555 Fulton and 2867-2899 San Bruno. The original plan review of 555 Fulton, conducted in April 2014, reflects the risks of improper preferential treatment at the plan review stage of a permit application. 2867-2899 San Bruno (the San Bruno properties) illustrates how improper preferential treatment can be provided during inspections.

Improper preferential treatment can be, but is not necessarily, an indicator of illegal or unsafe conditions.

- As has been publicly reported, the San Bruno properties originally posed a significant fire risk to residents there.
- As detailed later in this report, DBI is auditing the 555 Fulton project and has found no life/safety issues to date, only potential favoritism in the assessment of permit fees, fast-tracking of plan review, and abbreviated plan review. However, because DBI's audit is pending, these conclusions are not final.

Impact of Tone at the Top on DBI's Culture

Tone at the top refers to the ethical atmosphere that is created in the workplace by the organization's leadership, according to the Association of Certified Fraud Examiners (ACFE) and as discussed in our first report, [San Francisco Public Works Contracting](#). Management's tone has a trickle-down effect on employees: a tone that upholds ethics and integrity will encourage employees to uphold those same values. In contrast, a tone that appears to lack (or at least not emphasize) ethics, organizational responsibility, and accountability can encourage staff to tolerate or even commit fraud. When this is the case, staff feels it has no obligation to protect the organization.¹ Compliance with ethics rules must start at the top.²

Former Building Inspection Commissioners, Mel Murphy and Rodrigo Santos, fostered an unethical tone at the top by tolerating and promoting improper preferential treatment at DBI.

- **Rodrigo Santos** was a BIC commissioner from 2000 through 2005 and served as its president from March 2004 through January 2005. He used his knowledge of DBI and former role as commissioner to enrich himself and benefit his clients using a variety of schemes as discussed above, including preferential treatment and benefits conferred to him by former senior inspector Mr. Curran to his clients.
- **Mel Murphy** served as BIC commissioner from 2006 through early 2012 and served as its president from March 2009 to March 2011. He abused his privilege as former commissioner to demand a preferred building inspector attend inspections on his personal residential project.

¹ ["Tone at the Top: How Management Can Prevent Fraud in the Workplace,"](#) ACFE; ["Tone at the Top Conveying Responsibility and Accountability,"](#) ACFE, Suzanne Mahadeo.

² [A Resource Guide to the U.S. Foreign Corrupt Practices Act, Second Edition](#), U.S. Department of Justice and U.S. Securities and Exchange Commission, July 2020.

Impact of Mr. Hui's Tone at the Top on DBI's Culture

The former commissioners may have taken advantage of their insider knowledge and relationships built while serving as commissioners and influenced Mr. Hui's actions as the head of DBI, where he put little emphasis on organizational responsibility and accountability for ethics but emphasized the need to meet DBI's bottom line of processing permits and completing inspections in a timely manner. Although prompt service is a laudable goal, compelling or allowing DBI staff to provide improper preferential treatment is unacceptable.

On paper, DBI's code of conduct and policies and procedures are strong. Nevertheless, significant ethical violations occurred at DBI because Mr. Hui and his former leadership staff did not effectively implement these standards. Evidence further indicates that Mr. Hui provided improper preferential treatment to permit sponsors he favored by assigning certain inspectors to inspect their buildings (for example, Mr. Curran at the San Bruno properties), where violations would be overlooked.

Fraud Risk Posed by Mr. Hui

According to the ACFE, **fraud risk** is **vulnerability** that an organization faces from individuals **capable** of combining the three elements of fraud. Dr. Donald Cressey's "fraud triangle" states that three elements must be present for a person to commit fraud: **pressure**, **opportunity** and **rationalization**. We review Mr. Hui's actions through this model and the fraud risk he posed to DBI.

Pressure: *Insurmountable pressure, job security, or financial burden*

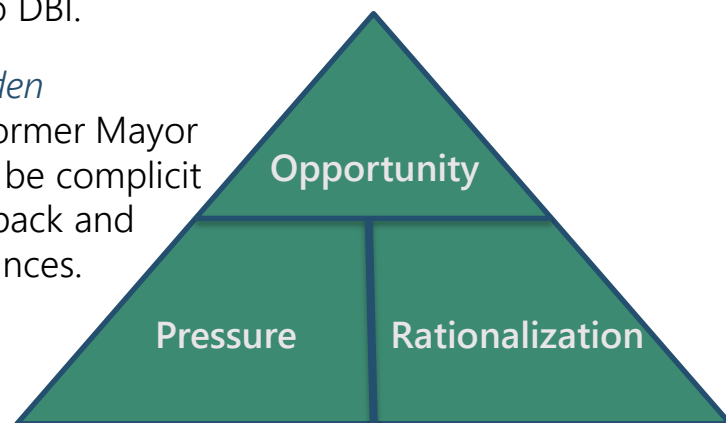
Mr. Hui may have felt pressure from his appointing authority, former Mayor Edwin Lee, who had a favorable relationship with Mr. Wong, to be complicit in actions to protect his job, which included soliciting DBI feedback and accepting favors and dinners from Mr. Wong and his acquaintances.

Opportunity: *Opportunity or perceived opportunity*

Because management is responsible for the design, implementation, and maintenance of internal controls, the risk always exists that management may override internal controls, as was the case with Mr. Hui.¹ As the department head, Mr. Hui had the opportunity to override internal DBI controls to assign favorable DBI staff and provide improper preferential treatment to Mr. Wong's projects by expediting permits and inspections and overlooking otherwise problematic issues in permitting and inspections.

Rationalization: *Justification of the fraud that makes it acceptable*

Mr. Hui appears to have rationalized preferential treatment for Mr. Wong by calling it good customer service without considering whether all members of the public had equal access to him as the director. In fact, Mr. Hui obtained benefits from the improper preferential treatment he enabled Mr. Wong to receive. Mr. Hui benefitted personally because the treatment may have helped maintain his job security and benefitted his relatives (via city hiring).



¹ ["Management Override of Internal Control: The Achilles' Heel of Fraud Prevention,"](#) American Institute of Certified Public Accountants.

DBI's Code of Professional Conduct and Statement of Incompatible Activities (SIA)

DBI has an extensive ethical Code of Professional Conduct (code of conduct) for its staff, customers, and commissioners. Specifically, DBI staff must:

- **Not compromise the integrity of the permitting process by exceeding or appearing to exceed their authority;** attempting to expedite plans or permits not assigned to them; providing unauthorized service outside their area of responsibility; **allowing extraordinary or unsupervised access to submitted plans or paperwork by any customer; or by asking others to do so.**
- **Not accept any gift, special favor, privilege, or benefit offered by a member of the public or by persons or businesses regulated by the department.**

Similarly, DBI clients and permit expeditors are expected to:

- **Not compromise the integrity of the permitting process by exceeding or appearing to exceed their authority.**
- **Offer no gift, special favor, privilege, or benefit to a member of the department or the commission.**

DBI's SIA also prohibits activities that conflict with official duties, including a prohibition on the **provision of services or information to any individual or entity if the services or information is not available to other members of the public on the same terms** (irrespective of whether the information is provided in exchange for any material benefit).

DBI's Organizational Culture

Preliminary Finding: Despite DBI's extensive departmental ethics rules, Mr. Hui's unfettered discretion and abuse of his official position as the department head created an unethical environment, caused lapses in public integrity, and encouraged abuse by other senior leaders who reported to him. Current DBI senior leadership must continue to demonstrate its commitment to an ethical culture to ensure compliance and foster an ethical climate, which Mr. Hui failed to do.

Former director's non-compliance with ethics disclosures: Although DBI staff completed mandatory ethics training and filed mandatory disclosure forms for the most part, compliance was only on paper for former senior leadership. Mr. Hui and Mr. Curran failed to disclose gifts from restricted sources and participated in decisions in which they had a financial interest. For example, Mr. Hui was required to file Form 700s for the tenure of his city employment. Despite receiving multiple private meals from Mr. Wong and/or Mr. Zhang in 2019, Mr. Hui's Form 700 reported no gifts. Also, [section 3.216\(b\) of the San Francisco Campaign and Governmental Conduct code](#) and the department's SIA likely prohibits many DBI employees, including former Director Hui, from receiving gifts in excess of \$25 from anyone in the position of Mr. Wong or Mr. Zhang. Also, DBI's code of conduct prohibits provision of intentional preferential treatment and access to Mr. Wong. Similarly, Mr. Curran and at least one other former DBI employee, who has not been named publicly and is no longer employed at DBI, made official decisions about projects owned by their personal lender, Freydoon Ghassemzadeh.

DBI's Current Remediation Efforts

Interim DBI Director Patrick O'Riordan has tasked his new executive team with implementing a series of reform initiatives to address issues raised by the federal complaint, the City Attorney's investigation, and findings of wrongdoing by former employees. Some of these tasks include:*

- Assisting with ongoing Controller and City Attorney investigations.
- Updating and reissuing DBI's code of conduct.
- Deploying hiring and outreach best practices by DBI's Human Resources unit to ensure hiring of ethical individuals who will foster and enforce an ethical tone at the top.
- Analyzing Permit Tracking System (PTS) data in consultation with the City Attorney to identify irregularities in plan approval or inspection processes.
- Creating an internal audit team to identify criteria that will trigger a life/safety review of properties where plans or inspections may have received improper preferential treatment from DBI staff in the past.
- Ensuring expanded compliance control efforts in alignment with Supervisor Hillary Ronen's proposed [legislation](#), which requires the department to implement expanded compliance control and consumer protection provisions for projects, individuals, agents, and entities with a history of significant violations.
- Modernizing DBI's technology to provide better data monitoring, transparency, and automation.
- Increasing spot checks and additional quality control and standardization of plan reviews to ensure consistency.

* A full list of DBI's reform initiatives can be found at its website, <https://sfdbi.org/reform-initiatives>

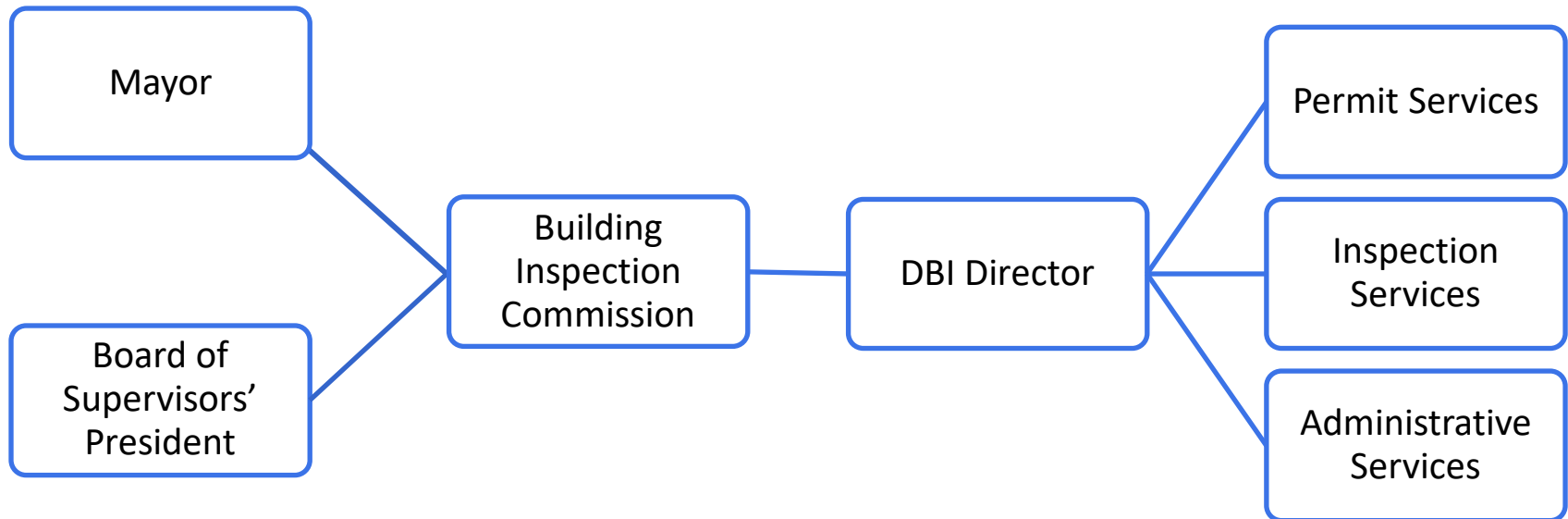
Overview of DBI's Oversight and Organization

Building Inspection Commission (BIC): The seven-member BIC oversees DBI by appointing the DBI director, setting departmental policy, hearing appeals of certain types of DBI actions, and using its monthly meetings to provide a public forum. The mayor appoints four positions to the BIC and the president of the Board of Supervisors appoints three.

Department of Building Inspection (DBI): DBI oversees the enforcement of San Francisco's building, housing, plumbing, electrical, and mechanical codes. DBI's purpose is to ensure that life and property in San Francisco are safeguarded. DBI is overseen by a director—currently Interim Director Patrick O'Riordan—who reports to the BIC. DBI is separated into three main divisions: Permit Services, Inspection Services, and Administrative Services.

- **Permit Services Division:** Receives, reviews, and issues permit applications for construction, electrical, plumbing, and street space permits. Ensures proposed construction meets all safety requirements. Assesses and collects fees related to these permits.
- **Inspection Services Division:** Inspects buildings for compliance with code requirements and to ensure the scope of work is in accordance with building permits. Responds to complaints on residential and commercial buildings.
- **Administrative Services Division:** Supports the department's fiscal management, performs purchasing and business analysis, and houses the records management, finance services, and management information services units.

Overview of DBI's Oversight and Organization *(continued)*



High-Level Risks in DBI's Permitting and Inspections Process

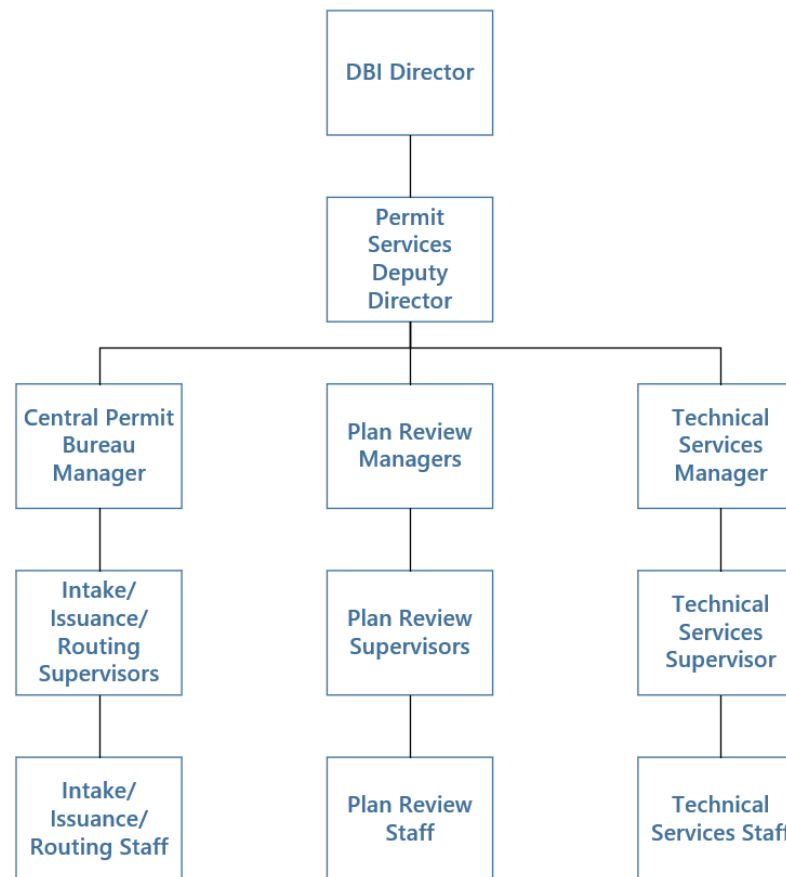
Employees in supervisory positions may provide improper preferential treatment in DBI's permitting and inspecting processes at two points:

- **Assigning plan reviews and/or inspections to staff.** Mr. Hui and possibly other employees who have since left the department were able to unilaterally assign specific DBI staff (including themselves) to conduct specific plan reviews or inspections. In some cases, this was done to provide improper preferential treatment.
- **Reviewing plans and inspecting work.** Improper preferential treatment can occur when plan check staff performs inappropriately expedited, less-than-thorough plan reviews. This includes, as described earlier about Mr. Curran, when an inspector signs off on inspection records without thorough inspection, including by intentionally overlooking violations.

Although conflict-of-interest rules are detailed in policies that employees must comply with, DBI would benefit from requiring its staff to complete twice annually certifications of compliance with city conflict-of-interest rules, including its SIA and code of conduct.

Organization of DBI's Permit Services Division

DBI's Permit Services Division is overseen by the director and Permit Services deputy director. The division is organized as shown below.



DBI's Permit Issuance Volume

DBI processes more than 50,000 permits per year. The table below summarizes DBI's permit activity in the last three fiscal years.

	FY 2018-19	FY 2019-20	FY 2020-21
Permit Employees	87	84	91
Number of Permits Issued			
<i>Building</i>	27,942	21,267	21,161
<i>Electrical</i>	15,826	12,994	12,964
<i>Plumbing</i>	18,425	15,160	15,919
<i>Miscellaneous</i>	8,943	7,043	711
Total	71,136	56,464	50,755
Construction Valuation <i>(based on issued permits)</i>	\$5,144,712,001	\$3,922,232,237	\$2,640,144,038

Source: Permitting data provided by the Department of Building Inspection.

Overview of DBI's Permit Process

Step 1: Applicant applies for permit.*

Depending on the type of permit being applied for, the review process may require additional steps.

- **Over-the-counter permits:** smaller, less complicated projects that may or may not require plans (drawings)
- **In-house review permits:** larger and more complicated projects that require plans (and other approvals)

Step 2: DBI reviews plans, estimates cost of work, and calculates fee.**

- Permit applications undergo varying degrees of review by DBI plan reviewers, depending on the proposed work's complexity and size, including reviews by other departments, as necessary.
- If plans exist, they are reviewed; permit fee is calculated based on the estimated construction cost.

Step 3: DBI approves or rejects permit application.

- If plans are approved, applicant goes to Step 4.
- If plans are not approved, they are sent back to the applicant to be revised and resubmitted.

Step 4: If permit is approved, DBI assesses permit fee.

- DBI assesses the fee calculated by the plan reviewer.
- Applicant pays the fee.

Step 5: DBI issues permit.

- DBI issues the permit.
- Work may begin immediately (except for demolition permits).

* Certain applications can be expedited, depending on the [project](#) or for [additional fees](#).

** Pursuant to [Ordinance 40-21](#), DBI requires additional review of submissions from individuals associated with multiple violations.

Types of DBI Permit Applications

Over-the-Counter (OTC) Permits: Plan reviewers review OTC permit applications for conformance with building code requirements. Plans are reviewed on a first-come, first-served basis through a waiting list.* These permits are also reviewed by other departments as needed. After all necessary reviews, DBI will review the full application, update the record in PTS, and approve the application. Once the applicant pays all applicable fees, the permit is issued.

In-House Review Permits: In-house review permit applications are first routed to the Planning Department for its review and approval. If approved by the Planning Department, the application is assigned to a plan reviewer based on employee workloads and project complexity. Plan reviewers are expected to begin reviewing full permit applications within three weeks of their assignment, but new deadlines can be established if justified. Senior plan reviewers are expected to review all their staff's plan reviews before permits are issued.

* During the COVID-19 emergency, customers have been required to drop off OTC permit applications to be reviewed by the various departments as needed, but DBI reports that it plans to return to its previous process. Certain applications can be expedited, depending on the [project](#) or for [additional fees](#).

Risks for Improper Preferential Treatment in DBI's Permit Process

Preliminary Finding: Some projects receive improper expedited permitting (earlier plan review start dates and shorter plan review times), which indicate preferential treatment.

- **Improper assignment of plan reviewers and expedited plan reviews:** Evidence indicates that compared to other permit applications, DBI expedited some permit applications of applicants who were favored by Mr. Hui and other former DBI employees. Although in-house review permits are normally assigned as they are received, senior management has the authority to assign specific plan reviews to specific employees, which, in some cases in the past, it appears to have done for improper reasons. Also, DBI has no way of knowing if a plan reviewer expedited a project in their queue over another. Permits for complex projects that are approved on the same day the permit application was filed—an instance of which is discussed in this report—may indicate improper preferential treatment.
- **Improper plan reviews:** DBI would not necessarily be aware if a permit was not reviewed thoroughly or properly. Whether intentional or unintentional, the problem is less likely to be detected because DBI does not currently require quality assurance reviews of senior plan reviewers' work. Also, although plan reviewers are to assess permit fees based on a construction [cost schedule](#), the fees can be assessed incorrectly without this being detected.
- **Unreported conflict of interest in the permit process:** As is the case citywide, DBI relies on employees to self-report financial conflicts of interest to establish whether the employee has a conflict with a permit applicant.

Background on 555 Fulton

- 555 Fulton is a mixed-use development consisting of 139 condominiums and commercial retail space. The project was developed by Fulton Street Ventures, dba Z&L Properties, Inc., which is privately funded by Guangzhou R&F Properties Co., Ltd.
- Mr. Zhang is a director of Z&L Properties, Inc., and the co-founder of R&F Properties Co., Ltd.
- According to DBI records, development of 555 Fulton began in 2013 and continued through this year.
- In February 2019, with assistance from Mr. Wong, Mr. Zhang met with Mr. Hui on three or four occasions to ask questions about 555 Fulton, and Mr. Hui improperly granted Mr. Zhang and Mr. Wong special access to DBI information.

555 Fulton: Appearance of Improper Preferential Treatment in the Permit Plan Review

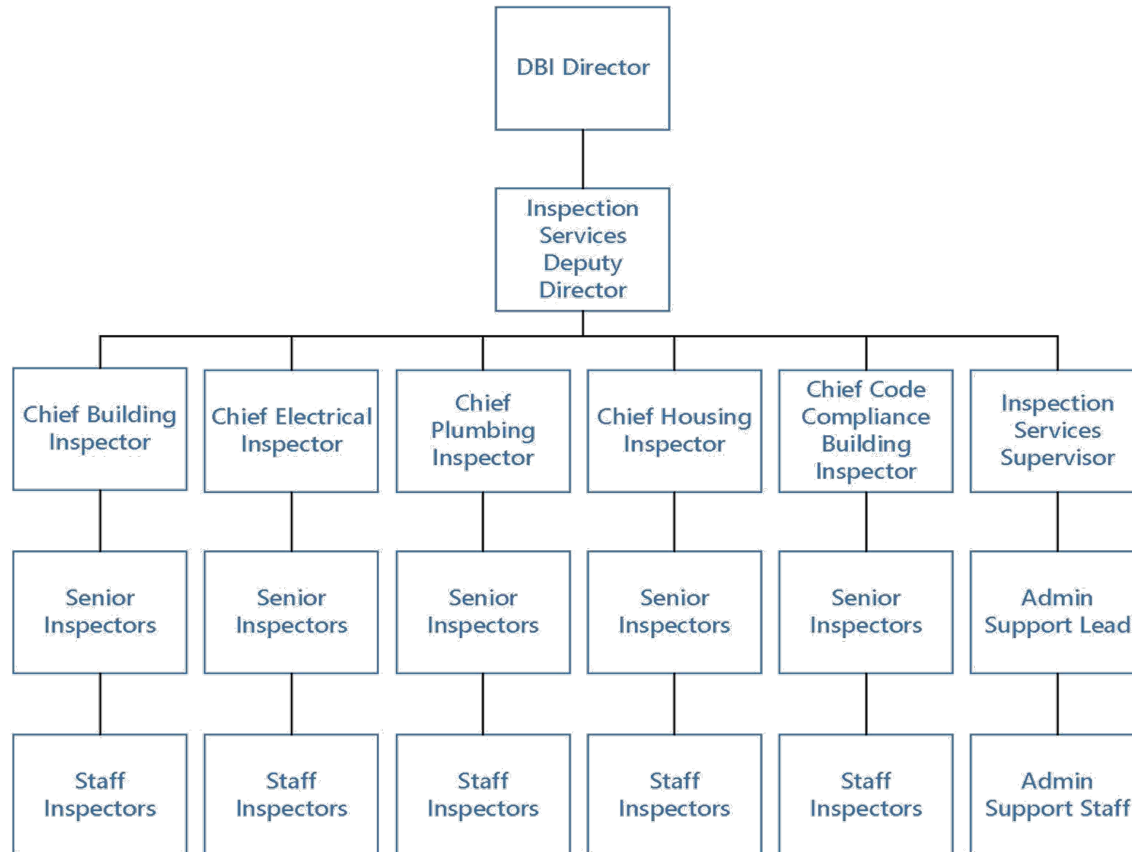
At least four of DBI's actions during the plan review process for 555 Fulton could give the appearance of improper preferential treatment:

- **Shoring plan review began immediately.** The review of the plans for the shoring permit application was greatly expedited; the assigned senior plan reviewer began reviewing the plans immediately after they were submitted. According to DBI, plan reviewers usually start a review a month or so after it is assigned to them.
- **Shoring plan review was unusually quick.** The shoring plans were reviewed and approved in less than a day. In contrast, an experienced DBI employee estimated that a review of this size and complexity would take at least three or four days.
- **Inaccurately low construction cost estimate caused the applicant to be undercharged.** The estimated cost for the proposed shoring work recorded for the permit was \$1.1 million less than it should have been per the DBI Cost Schedule. This discrepancy reduced the permit fee the applicant paid by approximately \$9,300.
- **No quality assurance review of the shoring permit:** The review that led to the approval of the shoring permit for 555 Fulton was not subject to a quality control review because it was performed by a senior plan reviewer rather than a plan reviewer.

No one who reviewed the shoring permit application or any superior in their chain of command, including Mr. Hui, is still employed by DBI.

Organization of DBI's Inspection Division

The Inspection Division is overseen by an inspection services deputy director and is divided into the following functional units: building, electrical, housing, plumbing, and code enforcement. Each unit is headed by the chief inspector and is staffed by senior inspectors and staff inspectors.



DBI's Inspections Volume

DBI conducts over 118,000 inspections per year. The table below summarizes DBI's inspection activity in the last three fiscal years.

	FY 2018-19	FY 2019-20	FY 2020-21
Inspections Employees	133	130	133
Number of Inspections			
<i>Building</i>	66,648	60,774	50,720
<i>Code Enforcement</i>	3,368	2,675	2,862
<i>Electrical</i>	39,735	34,009	31,733
<i>Housing</i>	12,134	8,083	3,180
<i>Plumbing</i>	38,064	33,897	30,211
Total	159,949	139,438	118,706

Source: Inspections data provided by the Department of Building Inspection.

Overview of DBI's Inspection Process

Step 1: Applicant begins construction work.

- After DBI issues a permit, construction may begin.

Step 2: DBI inspects work.

- Work performed under each permit is inspected by the applicable unit (Building, Electrical, and/or Plumbing) of the Inspection Division, as needed.
- Projects require various inspections as construction proceeds and meets defined milestones.

Step 3: DBI and others do additional inspections.

- Additional DBI and other department inspections (such as the Fire Department) are conducted as needed.
- Also, "special inspections" may be required at certain steps of a project. These inspections are conducted by a private engineer who is independent of the contractor.

Step 4: DBI does final inspection.

- Once the permitted work passes all previous inspections, the Inspection Division conducts a final inspection.

Step 5: Permit gets final sign-off and project is certified as complete.

- If the work passes final inspection, the inspector provides a final sign-off on the permit.
- If the work increased the building's square footage, a Certificate of Final Completion is issued.

Overview of DBI's Inspections Process

Permit Inspections Process: Each project requires at least one inspection. Projects are inspected for different purposes as construction progresses. Only one inspector conducts and attends most inspections. Once a building project is complete and has passed any other required inspections (such as electrical and plumbing inspections), a building inspector signs off on the final permit. A building inspector should be the last inspector to inspect a project and is to issue the final approval and any required certificates.

Building Inspection Districts: DBI divides San Francisco into 18 inspection districts (excluding Treasure Island and Yerba Buena Island). One building inspector is assigned to each district and reports to one of DBI's four senior building inspectors. Thus, DBI has 18 district inspectors.

Out-of-District Building Inspections: If the district inspector can conduct an inspection, it is inappropriate to assign it to another inspector. However, when district inspectors cannot conduct an inspection in their district, typically because they are on leave or their workload is too high, their senior inspector will assign another inspector to do so. These assignments usually go to floating inspectors. DBI has an inspector assignment "wheel" that is to be used to determine which inspector should conduct the inspection. DBI began using this wheel in 2014 after Mel Murphy, a former BIC president, requested that permitted work at his residence be inspected by a specific inspector. In general, inspectors change districts every two years, partly to reduce the risk of inspectors developing unethical relationships with permit applicants and property owners in their districts.

Overview of DBI's Inspection Scheduling

Standard advance scheduling: Individuals with permits can call DBI, use DBI's website, or visit DBI's office to schedule required inspections.

Same-day scheduling (non-standard): Certain urgent inspections can be scheduled on the same day they need to occur. This can be done by the chief building inspector, a senior inspector, or the district inspector. (District inspectors can do so only for projects in their districts and only with their senior inspector's approval.) Same-day inspections can occur when an inspector is at the property reviewing work under another permit or when a permit agent (who represents the client/owner) calls an inspector to request a same-day appointment.

Inspection assignment wheel: According to the inspection assignment wheel, when the district inspector cannot perform an inspection, the replacement inspector is to be chosen according to the following order:

1. Floating inspector
2. Inspector with availability on schedule
3. Inspector with schedule that is not completely full
4. Adjacent district inspector
5. Other building inspector
6. Senior inspector

Risks for Improper Preferential Treatment in DBI's Inspections

Preliminary Finding: Due to their relationships with DBI employees, some permit sponsors received improper preferential treatment for certain inspections.

- **Abuse of inspection scheduling protocols:** Previously, inspectors could unilaterally schedule inspections without approval, even if the inspection was out of their district and the district's inspector was working the day of the inspection.
- **Inspectors overlooking violations:** Previously, as evidenced in Mr. Curran's scheme, permit sponsors who had relationships with Mr. Hui and/or former DBI managers and inspectors requested and received same-day inspections by specific inspectors who intentionally overlooked violations, such as unauthorized changes of use or other code violations.
- **Inspectors approving final inspections although they were not conducted or not recorded as conducted:** "Ghost inspections" would be difficult to detect if a senior inspector signed off on the project although an inspection was not conducted. Also, DBI's inspection records may be (unintentionally or intentionally) incomplete if some inspectors fail to record all inspections in PTS.
- **Unreported conflict of interest in the inspections process:** As is the case citywide, DBI relies on employees to self-report financial conflicts of interest to establish whether an employee has a vested interest or improper relationship with a permit sponsor that conflicts with the employee's job duties in the inspection process.

Issues Identified in the August 20, 2021 Federal Complaint Against Mr. Curran and Mr. Santos

The U.S. Attorney's complaint alleges that Mr. Curran provided preferential treatment to Mr. Santos's clients who donated to the Golden Gate Rugby Association by:

- **Manipulating and abusing the inspections process:** This included malfeasance of improperly expediting or delaying inspections, so that Mr. Curran, rather than the assigned district inspector, could conduct the inspections, approving final inspections without the work being completed or other mandatory inspections being conducted, and approving inspections without visiting the property.
- **Unilaterally scheduling same-day and out-of-district inspections:** During May 2017 through April 2019, Mr. Curran conducted inspections for 12 clients who donated to the Golden Gate Rugby Association. Of the 14 inspections identified by the Controller's Office, all were same-day inspections and 12 were out-of-district. During July 2014 through June 2018, 34 of the 56 inspections Mr. Curran conducted for Mr. Santos's clients were same-day inspections.¹

¹ This data may be incomplete. Of the eight client-donor properties we identified, two had permits that did not include Mr. Santos as a permit agent. However, the U.S. Attorney's office documentation shows that Mr. Santos was involved with these permits. Further information on this issue is presented on a subsequent slide.

Background on the San Bruno Properties

- 2867-2899 San Bruno are five adjacent properties with the same owners. These properties are in Building Inspection District 12.
- In 2013 the owners received a permit to construct five, nearly identical, four-story buildings consisting of two residential units, two office spaces, and one commercial retail space. The project's estimated cost was \$5,266,460.
- In 2014 construction of these properties began.
- In January 2017 the project received its final inspection and approval.
- In December 2018 the Planning Department received a complaint alleging the addition of 20 unpermitted dwelling units in the buildings. The complaint was referred to DBI, which confirmed that 29 residential units were constructed instead of the permitted 10, creating fire-life safety concerns. Other permit violations and discrepancies from the developer's city-approved plans were also noted.
- In a pre-litigation settlement, the City Attorney's Office levied \$1.2 million in civil penalties for code violations. DBI issued the owners violations and fines, and the owners applied for a new permit to gain approval of the unpermitted construction.

Issues Identified at the San Bruno Properties

Preferential treatment provided: According to Mr. Curran, he was directed by Mr. Hui to inspect these properties.¹ Mr. Curran may have intentionally not identified violations at these properties due to perceived or actual pressure from Mr. Hui.

Inspections did not identify violations, including changes affecting fire safety: Despite allegedly conducting two same-day inspections, Mr. Curran did not identify violations later found by the joint task force,² including the fact that 20 dwelling units had been added illegally. This entailed piping for additional kitchens that had been installed without a plumbing permit and associated electrical installation that had been altered without an electrical permit. Also, the illegal additional units changed the project's occupancy category. A 29-unit project is subject to more stringent fire safety standards than is a 10-unit project.

Final inspection approval without underlying inspections having been performed: Despite these violations and without the building inspections that should have been performed earlier, records show that Mr. Curran conducted the final inspection and gave the final sign-off on the permit.

¹ DBI's Staff Report on the San Bruno properties, August 17, 2021.

² Several city agencies, including DBI, the San Francisco Fire Department, SF Planning and the City Attorney's office created this task force to determine the full extent of building, planning and fire code violations at this property.

Issues Identified at the San Bruno Properties *(continued)*

Disregarded inspection assignment wheel: Mr. Curran unilaterally assigned himself to two same-day inspections at these properties in Inspection District 12, disregarding the building inspection assignment wheel, which should have been used. The District 12 inspector was working in the district on the day of one of these inspections, so should have conducted it. The district inspector was off on the day of the other inspection but, according to the inspection assignment wheel, a senior inspector, such as Mr. Curran was, should have been the last option to conduct this inspection.

Minimal number of inspections for a project of its size: Five four-story buildings were constructed over three years for this project, yet it received only four inspections. In contrast, a sample of 1,838 other building permits for work completed in July 2014 through July 2021 that had comparable estimated construction costs (\$1 million to \$10 million) showed an average of more than seven inspections per permit.

Permit Tracking System data is incomplete; inspections either were not recorded in PTS or did not occur: According to DBI, Mr. Curran claimed that inspections were documented by hand on paper job cards for some of the San Bruno properties and were not recorded in PTS. DBI policy requires inspectors to record all inspections in PTS. When documented by hand, it is difficult to ensure all inspections were conducted and to hold inspectors accountable for completing inspections.

Overview of DBI's Database and Record Retention Systems

The PTS database contains high-level information, by property address, on permit applications and issuance, inspections, complaints, and final sign-offs. PTS does not contain any supporting documents, which are instead scanned and uploaded to DBI's document management system. DBI also uses a separate electronic plan review software that allows applicants to submit plans electronically. Building plans for projects that are no longer active are held by the Planning Department and must be requested if needed. Changes made to PTS data are tracked by a technical log that system users can access only upon request.

PTS has three user levels, each with a different level of access:

- **Public:** The public has read-only access to complaints and inspection records for specific properties. See *Appendix* for details.
- **Internal:** DBI employees can enter and edit data. An employee's access level depends on their role in the department.
- **Management Information Services (MIS) staff:** With the system's highest access level, this staff can provide technical administration, including generating reports from PTS records.

Additional DBI Data Monitoring Is Warranted

Preliminary Finding: PTS records of some properties are incomplete.

PTS **inspection records** for some properties we surveyed appear to be incomplete. All inspections conducted under each permit are to be recorded in PTS and should be searchable by property address. However, according to DBI, in some cases where there were multiple permits (and multiple job cards) for the same property active simultaneously, PTS inspection records are incomplete.

According to DBI, some inspectors signed off on final building inspections by relying on information written on paper job cards. However, neither images of the job cards nor the information on them is consistently recorded in PTS. DBI acknowledges that some critical data for some properties is not in PTS. Thus, DBI is at a significant disadvantage in monitoring its permitting and inspections activities.

Additional DBI Data Monitoring Is Warranted *(continued)*

Preliminary Finding: Not all inspection records in PTS have the same editing controls. Some examples of inconsistent editing controls include:

- PTS building inspection records can be modified after an inspection is completed by any building inspector or senior building inspector until the inspection record of the property is closed.
- In contrast, the Electrical Inspection Division locks its records after 10 days, but senior electrical inspectors can modify the final inspection result.

Only the MIS technical staff has access to the technical audit log in PTS which shows when modifications are made, and staff reviews the log only when there is a request or complaint that requires doing so. Making the audit log accessible to certain managers or regularly providing management with activity reports of recent log entries in a form they could easily understand could increase accountability by enabling managers to identify any suspicious modification of records.

Additional DBI Data Monitoring Is Warranted *(continued)*

Preliminary Finding: DBI has no centralized monitoring of its permitting or inspections processes. Because of this, management may not be as likely to identify and detect certain potential fraud and abuse risks.

Although over 250 reports—such those on plan reviewer activity, permit backlog, and inspection activity—can be generated from PTS, DBI has made no centralized effort to leverage information in PTS to proactively monitor the work of its staff. Thus, DBI is missing an opportunity for automated risk-reporting offered by the data in and reporting capability of PTS.

Such proactive monitoring could begin with reports on:

- Improperly routed permits
- Expedited permit reviews
- Same-day inspections
- Out-of-district inspections
- Average daily percentage or number of completed inspections
- Completeness and potentially improper modification of inspection records
- Number of inspections sorted by permit type (\$ amount and complexity)

Additional DBI Data Monitoring Is Warranted *(continued)*

Below is an example of information that could be in a report that DBI could generate from PTS to help assess fraud risks in the department's inspections activities.

Inspector	Days Served as Inspector	Number of Inspections*	Number of Same-Day Inspections	Inspections per Day	Same-Day Inspections per Day
Bernard Curran	2,564.00	7,783.00	5,645.00	3.04	2.20
Average of Other Senior Inspectors**	1,285.50	1,327.50	718.67	1.03	0.56

Source: Inspection data for all building inspections scheduled during July 1, 2014 through July 6, 2021.

* Includes inspections of building permit alterations, which are inspections to authorize the alteration of original building permits. Additional analysis is needed to determine if the building permit alterations were appropriate.

** Six other senior inspectors' data were reviewed for this period.

This example shows that **Mr. Curran** conducted many more same-day inspections than did the other senior inspectors. Although same-day inspections are sometimes warranted, the disparity between this senior inspector's total and the average of other senior inspectors is stark. Without monitoring, possibly including analysis of a sample of these same-day inspections, management has no way to detect whether this senior inspector abused these inspections and/or conducted them improperly.

DBI Complaints

Complaints Process: Anyone can file a complaint about specific properties or inspectors. Complaints often fall into one of the following categories:

- **Work exceeds permit scope:** These complaints usually are investigated by the district inspector assigned to the property. DBI would be unaware if district inspectors afforded improper preferential treatment to a certain property owner or their agent by overlooking violations and/or prematurely abating complaints.
- **Inspectors' work is improper:** These complaints are reviewed by the senior inspector whose districts include the relevant property (and, usually, the one who supervises the inspector who is the subject of the complaint). However, because these investigations are done in conjunction with the subject inspector, this risks inspectors reviewing their own work and abating complaints when they should not.
- **Unpermitted work:** The **Code Enforcement Division** investigates these complaints and addresses any violation found at properties with no active permit. This includes collecting fees and penalties from the owner and monitoring compliance with the terms of any enforcement action.

Complaint dispositions are reported publicly in PTS. Dispositions include DBI issuing a notice of violation, assessing fees, and ordering corrective actions. Complaints with serious findings can lead to case referrals to the City Attorney's Office for possible litigation.

Insufficient Fines to Deter Permit Violations

Preliminary Finding: When violations are found by code enforcement inspectors or reported by a member of the public, property owners may incur fees and penalties. However, for large projects these fees and penalties may not be sufficient to deter misconduct.

Violation	Penalty
Exceeding scope of approved permit	Two times the Permit Issuance Fee <u>Example:</u> New construction valued ¹ at \$1 million would be assessed a \$5,724.12 penalty.
Work without permit investigation fee	Nine times the Permit Issuance Fee plus the original permit fee <u>Example:</u> New construction valued at \$1 million would be assessed a \$28,620.60 penalty.

Source: [San Francisco Building Code, Table 1A-K](#)

¹ The building permit fee amount depends on the [project's estimated value](#).

As part of its ongoing reform efforts, DBI plans to expand and clarify public information and outreach on code enforcement and violation penalties.

Further Public Outreach Is Needed

Preliminary Finding: Publicly available information on DBI's permit and inspections processes is insufficient. The public should have more information about when and how to obtain a permit, the permit review and approval process, and the order of required inspections.

DBI's website provides information on the department's [Permit Services](#) and the process to submit a permit application but does not describe when a permit is needed or the types of permits a project may need. DBI last published [general permit guidance](#) 17 years ago, in October 2004. The lack of up-to-date guidance can only deter first-time and infrequent permit applicants.

Similarly, DBI's website provides information about its [Inspection Services](#) and the types of inspections available, but it does not state what inspections are required for various types of permits or the order in which the inspections should be conducted. This information could be helpful to first-time or infrequent permit applicants.

Additional public-facing information would increase DBI's transparency and accountability in its permitting and inspections process. Recently, DBI began efforts to update its website and improve information and guidelines for its customers.

Recommendations

Given the findings of our preliminary assessment, we offer the following preliminary recommendations, which we may refine as the investigation and review continue and we consider the feedback we receive in the review process.

1. **The Building Inspection Commission should work with the Department of Building Inspection to ensure it sets a good ethical tone at the top and reiterates the importance of compliance with ethics laws and rules.**

The Department of Building Inspection should:

2. **Remind its employees of the availability of the Whistleblower Program to report allegations of deficiencies in the quality and delivery of government services, wasteful and inefficient government practices, misuse of city funds, or improper activities by city government officers and employees.**

Recommendations *(continued)*

3. Create a compliance program, independent of other divisions within the department and resourced with newly-selected and specialized staff and outside auditors and consultants, to help identify risks and combat fraud and abuse in permitting and inspection activities through training and enforcement, including but not limited to:
 - a) Performing an annual risk assessment of each DBI division and tools in place to mitigate identified risks.
 - b) Performing monthly reviews of same-day inspection schedules, out-of-district inspections, urgency of these inspections, and validity of these inspection approvals.
 - c) Identifying any instances of permit applications deviating from established procedures, such as building plan reviews being conducted more quickly than expected.
 - d) Ensuring consistent training and guidance on permit plan reviews and inspections by preparing and implementing annual training plans that cover all employees involved in these functions.
 - e) Performing testing of its adherence to its Statement of Incompatible Activities, Code of Professional Conduct, city laws, and DBI policies.

Recommendations *(continued)*

4. Ensure its Permit Tracking System (PTS) has complete and accurate data, and has adequate controls to deter unauthorized modification of PTS records that conceal wrongdoing by DBI employees by:
 - a) Requiring that all inspections are complete and recorded in PTS before a final permit sign-off is completed.
 - b) Electronically locking inspection records in PTS so they cannot be edited after a certain period, such as 24 or 48 hours after initial entry.
 - c) Creating an audit log for PTS, in addition to the technical log, to summarize who entered what information into PTS and when. It should be readily understandable and largely accessible to the public and subject to the department's record retention policy.
5. Require supervisory quality assurance reviews of senior plan reviewers and senior inspectors' work, as well as for permits and inspections for projects that may warrant additional review, such as those that are larger or more complex.

Recommendations *(continued)*

6. Consider whether plan reviewers and inspectors should be required to certify biannually that they comply with city conflict-of-interest rules, the department's Statement of Incompatible Activities, and the department's Code of Conduct, to remind them of the City's ethics rules and help prevent future conflicts of interest.
7. Review the fees and penalties the department is authorized to levy for non-compliant construction (documented in Notices of Violation) to determine whether they are severe enough to effectively deter misconduct. If the department determines the fees and penalties are insufficient, it should recommend to the Building Inspection Commission that they be increased within legal constraints.
8. Conduct more outreach to educate the public on the City's permit and inspections process. For example, a checklist for permit sponsors listing the required types and order of inspections needed to construct or renovate a residential structure could be beneficial.

Completed and Upcoming Public Integrity Reporting

The Controller's Public Integrity Review, performed in consultation with the City Attorney, will continue to assess selected city policies and procedures to evaluate their adequacy in preventing abuse and fraud. Completed, current, and future assessments and reports address the following topics:

- [San Francisco Public Works Contracting](#) (June 29, 2020)
- [Gifts to Departments Through Non-City Organizations Lack Transparency and Create "Pay-to-Play" Risk](#) (September 24, 2020)
- [San Francisco's Debarment Process](#) (November 5, 2020)
- [Ethical Standards for Contract Award Processes of the Airport Commission and Other Commissions and Boards](#) (January 11, 2021)
- [Refuse Rate-Setting Process Lacks Transparency and Timely Safeguards](#) (April 14, 2021)
- [12-Month Status on Public Integrity Recommendations](#) (August 4, 2021)
- The San Francisco Public Utilities Commission contracting process, Community Benefits program, and project-specific audits
- Citywide ethics reporting requirements

Additional reviews and assessments will be determined and performed as the City Attorney's investigation proceeds.

Any questions or comments?

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Appendix: Publicly Available DBI Information

DBI's public-facing PTS website allows the public to access information on specific properties, permits and complaints. Permit specific information provides the public application numbers, addresses, description of permits and estimated costs, as well as the disposition/stage of the permits. It also identifies the contractor(s) and authorized agent(s) for each permit.

Permit Information And Status:

Application Number: 201404233963
 Form Number: 3
 Address(es): 0794 / 028 / 0 555 FULTON ST
 Description: PROVIDE SHORING PER PLANS - REF TO APP #201501036062 FOR NEW BLDG - COMPLIANCE WITH ORDINANCE NO.155-13 REQUIRED.
 Cost: \$2,000,000.00
 Occupancy Code: U
 Building Use: 79 - VACANT LOT

Disposition / Stage:

Action Date	Stage
4/23/2014	TRIAGE
4/23/2014	FILING
4/23/2014	FILED
5/21/2014	PLANCHECK
5/21/2014	APPROVED
5/22/2014	ISSUED
5/9/2019	COMPLETE

Contractor Details:

Contractor Details:

License Number: 990908
 Name: ROBERT BUCKNER
 Company Name: FULTON STREET CONSTRUCTION INC
 Address: 1426 FILLMORE STREET STE 213 * SAN FRANCISCO CA 94115-0000
 Phone:

Permit Agents:

permit, along with their roles on the project.

Permit Number: 201404233963

Below is a list of all agents for the selected

	Firm Name▼	Agent Name	Role	From	To
Info	TUAN ROBINSON ENGR	TUAN ROBINSON	ENGINEER	4/23/2014	
Info	FULTON STREET CONSTRUCTION INC	ROBERT BUCKNER	CONTRACTOR	4/23/2014	
Info	EDESIGN C INCORPORATED	JAMES DYER	PMT CONSULTANT/EXPEDITER	4/23/2014	

Publicly Available DBI Information *(continued)*

DBI's website provides a description of each permit review as well as pending and completed inspections, including special inspections, conducted on each property.

Permit Reviews:

Description:

Step	Station	Arrive	Start	In Hold	Out Hold	Finish	Checked By	Hold Description
1	CPB	4/23/14	4/23/14			4/23/14	LEE ANITA	
2	BLDG	4/23/14	4/30/14			4/30/14	YU CYRIL	
3	DPW-BSM	4/30/14	5/2/14	5/2/14		5/21/14	CY LIONGTIAN	Approved! 5-21-14 Subject to all conditions of DPW/BSM Permit # 14mse-0163. Pre-construction site meeting and DPW/BSM sign off is required. 5-19-14 BSM is ready to sign off. Please route the plans and original application to BSM for sign off process. ref: 14mse-0163 On hold! 5-2-14 Your BPA will be on hold, until all necessary DPW/BSM permits are completed, or the receiving BSM plan checker-recommending sign off. Ref: 14mse-0163
4	HEALTH	5/2/14	5/9/14			5/9/14	HEILSHORN ELYSE	
5	PPC	5/21/14	5/21/14			5/21/14	SAMARASINGHE GILES	5/21/14: to CPB.grs 5/19/14: to BSM.grs
6	CPB	5/21/14	5/21/14			5/22/14	LEE ANITA	05/21/2014: APPROV BY BYAN.

This permit has been issued. For information pertaining to this permit, please call 628-652-3450.

Inspections:

Appointments:

Appointment Date	Appointment AM/PM	Appointment Code	Appointment Type	Description	Time Slots
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Inspections:

Activity Date	Inspector	Inspection Description	Inspection Status
5/9/2019	William Walsh	FINAL INSPECT/APPRVD	FINAL INSPECT/APPRVD
8/27/2014	John Yam	REINFORCING STEEL	REINSPECT REQUIRED
8/20/2014	Michael Quinlan	REINFORCING STEEL	REINFORCING STEEL

1 2

Special Inspections:

Special Inspections:

Addenda No.	Completed Date	Inspected By	Inspection Code	Description	Remarks
0	3/10/2017	PBR	21A	SHORING	letter forwarded to inspector 3/8/17 jj
0	3/10/2017	PBR	24F	OTHERS	pre-construction mtg w/ engr & special inspector
0	3/10/2017	PBR	21C	OTHERS	tiebacks & lagging
0	11/3/2014	YTCHIU	5A1	SINGLE PASS FILLET WELDS < 5/16"	

Publicly Available DBI Information *(continued)*

DBI publishes the following information through [DataSF](#) on a weekly basis:

- **Permit Data:** Listing of application/permit numbers, job addresses, supervisorial districts and status of applications for building, electrical, and plumbing permits.
- **Permit Contacts:** Listing of contacts associated with building permits, including name, address, and license number.
- **DBI's Notices of Violation:** Listing of complaint numbers, violations, and inspector comments.
- **DBI Complaints:** Listing of complaints from Housing, Building, Electrical, Plumbing and Code Enforcement divisions.
- **DBI Inspection Division Districts:** Listing of Inspectors and the district they are assigned to based on division.

The public can review data using these separate datasets but would need to compare and reconcile the data. Additional non-public data or context is necessary to ensure conclusions drawn from this data are appropriate. For example, the performance of an out-of-district inspection could be found by reconciling the data but can be warranted under specific circumstances.