



San Francisco Ethics Commission

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Lobbying Audit Report:

Melinda Sarjapur

Lobbyist ID: SFO-153949

January 1, 2021 – December 31, 2021

Introduction

Public disclosure of the identity and extent of efforts of lobbyists to influence decision-making regarding local legislative and administrative matters is essential to protect public confidence in the responsiveness and representative nature of government officials and institutions. The San Francisco Lobbyist Ordinance (San Francisco Campaign & Governmental Conduct Code [SFC&GCC] Section [Sec.] 2.100 et seq.) was established to impose reasonable registration and disclosure requirements to reveal information about lobbyists' efforts to influence decision-making regarding local legislative and administrative matters. By restricting gifts, campaign contributions, and bundled campaign contributions by lobbyists, the law is designed to increase public confidence that governmental decisions are not, and do not appear to be, influenced by the giving of personal benefits to City officers by lobbyists, or by lobbyists' financial support of City officers' political interests.

To promote lobbyists' compliance with the law, the San Francisco Ethics Commission conducted an audit of **Melinda Sarjapur: SFO-153949** (hereinafter "the Lobbyist") covering the audit period January 1, 2021, through December 31, 2021. This Audit Report summarizes the results for the audit.

Authority

Under SFC&GCC Sec. 2.135(c), the Executive Director of the Commission shall initiate audits of one or more lobbyists selected at random on an annual basis and undertake any other audits or investigations of a lobbyist authorized by law or regulation.

Objectives and Scope

The objective of the audit was to reasonably determine whether the Lobbyist substantially complied with requirements of SFC&GCC Sec. 2.100 et seq. and supporting regulations.

The audit was performed based on a review of the Lobbyist's filings and records covered by the audit period to determine, among other things:

- Compliance with disclosure and record-keeping requirements pertaining to lobbyist registration, monthly disclosure reporting, and training; and
- Compliance with applicable restrictions on lobbyist activity.

The Lobbyist was randomly selected for audit from a population of registered lobbyists who filed disclosure statements with the Ethics Commission for the period January 1, 2021, through December 31, 2021.

Nothing in this report shall be interpreted to prevent an enforcement action by the Ethics Commission or another appropriate agency for conduct in violation of the law, whether or not that conduct is covered by this report.

This report will be posted to the Commission's website and forwarded to the Commission's Enforcement Division for review to determine whether any further action may be warranted.

Auditee Information

Background

At all times relevant to the audit, the Lobbyist was a contact lobbyist employed by Reuben, Junius & Rose, LLP, a full-service real estate law firm. The Lobbyist engaged in both permit consulting (as defined in SFC&GCC Sec. 3.405) and lobbying (as defined in SFC&GCC Sec. 2.105 and Regulation 2.105-3) services on behalf of clients of Reuben, Junius & Rose, LLP. The Lobbyist contacted public officials regarding matters related to planning and building permits. The Lobbyist renewed their registration for the 2021 calendar year on December 21, 2020.

Lobbyist Reported Activity

Total Number of Contacts	1,081
Total Payments Promised	\$115,892
Total Activity Expenses	\$0
Total Contributions	\$0

The lobbyist activity totals were taken from disclosure statements filed with the San Francisco Ethics Commission for the period January 1, 2021, through December 31, 2021.

These totals reflect activity for both permit consulting services and lobbying services. As the scope of the audit pertained to only lobbying related activity, all identified permit consulting activity was excluded from review. Activity reviewed during the audit is summarized in the table below.

Total Number of Contacts	127
Total Payments Promised	\$9,480
Total Activity Expenses	\$0
Total Contributions	\$0

Audit Respondent

The Audit Respondent identified below was the primary audit contact during the audit and responded to audit inquiries and requests on behalf of the Lobbyist.

Philip Le, Legal Assistant
Reuben, Junius & Rose, LLP
One Bush Street, Suite 600
San Francisco, CA 94104

Audit Findings

Under SFC&GCC Sec. 2.110(c)(1), contact lobbyists shall report to the Ethics Commission for each calendar month information regarding contact activity to influence local legislative or administrative action and economic consideration received or expected, among other things, no later than the fifteenth calendar day following the end of the month. Under SFC&GCC Sec. 2.110(d), lobbyists shall amend any information submitted to the Ethics Commission through registration and monthly disclosures within five days of the changed circumstances that require correction or updating of such information.

The following findings were noted during the audit:

Registration

Fourteen new clients were not timely reported on amendments to the San Francisco Ethics Commission Contact Lobbyist Registration within the five-day deadline to disclose the changed circumstance. This number represented 100% of the new clients that were required to be disclosed during the audit period. These clients were reported on amendments filed between 14 and 59 days after required disclosure deadlines. See table below.

	Client Name	Client Start Date	Required Disclosure Date	Actual Disclosure Date	Days Late
1	3641 California Street LP	1/27/2021	2/1/2021	2/15/2021	14
2	C2 Education	2/3/2021	2/8/2021	3/15/2021	35
3	Vasati Nob Hill Residence LLC	5/12/2021	5/17/2021	6/14/2021	28
4	Foodcast, Inc.	7/20/2021	7/25/2021	8/14/2021	20
5	Potrero Hill Imaging LLC	7/21/2021	7/26/2021	8/14/2021	19
6	Align Real Estate LLC	8/11/2021	8/16/2021	9/13/2021	28
7	Farese/Bob & Nancy	8/23/2021	8/28/2021	9/13/2021	16
8	Graham/Amy	9/02/2021	9/7/2021	10/15/2021	38
9	Hourteillan/Heidi Nutters & Lore	9/02/2021	9/7/2021	10/15/2021	38
10	San Francisco Zen Center	9/14/2021	9/19/2021	10/15/2021	26
11	NOPA Heights Partners LLC	10/13/2021	10/18/2021	11/13/2021	26
12	2700 Sloat Holdings LLC	11/08/2021	11/13/2021	12/15/2021	32
13	MMM Housing for Artists	12/08/2021	12/13/2021	2/10/2022	59
14	Chase Sandy Beach Developing LLC	12/15/2021	12/20/2021	1/13/2022	24

Monthly Disclosure Statements

1. The December 2021 San Francisco Ethics Commission Individual Lobbyist Statement was filed late on January 19, 2022. The Statement was required to be filed on January 18, 2022. A late filing fee of \$50 was assessed and paid.
2. Six contacts made with City Officers were not disclosed on monthly San Francisco Ethics Commission Individual Lobbyist Statements. See table below.

	Contact Date	Client	Issue / Project	Required Disclosure Deadline
1	7/12/2021	Tishman Speyer Properties	Block 1	8/15/2021
2	7/20/2021	Tishman Speyer Properties	Block 1	8/15/2021
3	9/2/2021	Graham/Amy	145 Bonview Street	10/15/2021
4	10/7/2021	Hourteillan/Heidi Nutters and Lore	148 Ostego Avenue	11/15/2021
5	10/18/2021	Hourteillan/Heidi Nutters and Lore	148 Ostego Avenue	11/15/2021
6	10/21/2021	Hourteillan/Heidi Nutters and Lore	148 Ostego Avenue	11/15/2021

Conclusion

Except as indicated in the **Audit Findings** section above, and in our opinion, the Lobbyist substantially complied with the requirements of SFC&GCC Sec. 2.100 et seq. and supporting regulations.

Auditee Response

In response to the finding pertaining to the non-disclosure of six contacts made with City Officers on monthly San Francisco Ethics Commission Individual Lobbyist Statements, the Audit Respondent indicated the following:

- *"**Contact #1** entailed responding to an email correspondence to which the City Official had been cc'd by another City Official. The other City Officials on that chain were reported as lobbyist contacts on our report for 7/12/21, but the referenced City Official was unintentionally omitted.*
- ***Contact #2** entailed cc'ing the City Official on an email directed to other City Officials. The other City Officials on that email chain were reported as lobbyist contacts on our report for 7/20/21, but the referenced City contact was unintentionally omitted.*
- ***Contact #3** entailed cc'ing the City Official on an email directed to other City Officials. The remaining City Officials on that email chain were reported as lobbyist contacts on our report for 9/12/21, but the referenced City Official was unintentionally omitted.*
- ***Contacts #4-#5** were reported on my internal records but were unintentionally omitted from the October Lobbyist Report in error."*