



San Francisco Ethics Commission

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Date: September 4, 2026

To: Members of the Ethics Commission

From: Ryan Abusaa, Senior Policy Research Specialist
Trishia Lim, Policy Research Specialist

Re: **AGENDA ITEM 10 – Discussion and possible action regarding request for waiver of post-employment restrictions for Nancy Byun Riedel**

Summary and Action Requested

This memo provides background and analysis to assist the Commission in determining whether to grant a post-employment waiver to Nancy Byun Riedel. The Commission should evaluate Ms. Riedel's waiver request, as required by City law, and consider whether granting Ms. Riedel a waiver would create the potential for undue influence or unfair advantage.

Based on its review of Ms. Riedel's request and applicable law, Staff recommend that the Commission approve a limited waiver for Ms. Riedel.

Background

On August 16, Nancy Byun Riedel sent a formal request to the Commission asking that certain post-employment restrictions under Section 3.234 of the Campaign and Governmental Conduct Code (C&GCC) be waived. Ms. Riedel previously served as the Director of the Airport Integrated Operations Center ("AIOC") for San Francisco International Airport ("SFO" or the "Airport"), a department of the City and County of San Francisco. She left City service on August 28, 2026, and began a new role with United Airlines ("United") as the Managing Director of the Station Operations Center ("SOC") at SFO on August 31, 2026.

Ms. Riedel's waiver request is included as [Attachment 1](#). The facts included in this memorandum are drawn from Ms. Riedel's written request, and additional follow-up correspondence received via email.

Ms. Riedel first contacted the Commission about this matter on August 5 and engaged in ongoing communications about her new employment and the applicability of the City's post-employment restrictions. Following several communications with Ms. Riedel, Staff provided Riedel with informal advice on August 12 that confirmed a waiver from the Commission may be necessary given the duties of her new position. The informal advice also offered guidance on the waiver process and how to formally request such a waiver. A copy of Staff's informal advice to Ms. Riedel is included as [Attachment 2](#).

Applicable Law

The City has rules for what current and former City officers and employees can do after they leave City service. These rules further the purpose of the Campaign and Governmental Conduct Code, which per [Section 3.200](#), is chiefly to “promote fairness and equity for all residents and to maintain public trust in governmental institutions.” The law seeks to ensure “that public officers and employees [are] independent, impartial, and responsible to the people and that public office and employment [is] not...used for personal gain.” The Code also asserts that government decisions by City officers and employees “should be, and should appear to be, made on a fair and impartial basis.” Under [Section 3.234](#) and [its supporting regulations](#), the City’s post-employment and post-service restrictions include a one-year restriction on communicating with the City official’s former department with the intent to influence a government decision.

One-Year Restriction on Communicating with Former Department

[Section 3.234\(a\)\(2\)](#) of the C&GCC prohibits former officers and employees from, with the intent to influence a government decision, communicating on behalf of any other person (except the City) with any officer or employee of the department for which the former employee served, for one year following the termination of their employment with the City. Ethics Commission [Regulation 3.234-2](#) outlines the scope of this restriction and provides guidance on determining whether this one-year ban applies.

The scope of this restriction applies to attempts to influence any government decisions, which, as defined in Ethics Commission [Regulation 3.234-5](#), occurs whenever communications – orally, in writing, or in any other manner – are made for the purpose of supporting, promoting, influencing, modifying, opposing, delaying, or advancing a governmental decision. There are exceptions, which include routine requests for information, communications made while attending a general informational meeting, seminar, or similar event, or communications that only seek to influence actions that are solely ministerial, secretarial, manual, or clerical.

This one-year post-employment communication ban furthers the goals of the C&GCC by ensuring that former City officers and employees cannot use their recent position with a department to unduly influence or appear to influence the actions of that department. Without this rule, City officials could leave City service and immediately start advocating for their new employer by communicating with their former department to affect decisions in favor of their new employer. This outcome exemplifies the “revolving door” issues that can arise when former City officials transition from their public service roles into positions with new employers.

This restriction is designed as a modest but fundamental safeguard to support the fairness of governmental decision making and to preserve the public’s trust in the integrity of governmental decisions. It recognizes that former City officers and employees can have unique knowledge and access that could unfairly advantage the ability of their new employer or clients to secure beneficial outcomes in a way not available to other entities or organizations in the same field who also may seek opportunities to do business with the City.

Waiver Authority of the Ethics Commission

[Section 3.234\(c\)\(1\)](#) of the C&GCC grants the Commission the ability to waive the one-year restriction on communicating with former department, “if the Commission determines that granting a waiver would not create the potential for undue influence or unfair advantage.”

Ethics Commission [Regulation 3.234-4](#) further outlines the process for submitting and potentially approving post-employment waivers. The regulation specifies that the Commission “shall not approve any request for a waiver from the permanent or one-year 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.” When determining the granting of such a waiver would create the potential for undue influence or unfair advantage, the regulation specifies that the Commission may consider:

- the nature and scope of the communications the individual will have with his or her former department, board, commission, office, or unit of government;
- the subject matter of such communications;
- the former position held by the officer or employee;
- the type of inside knowledge that the individual may possess; and
- any other factors the Commission deems relevant.

The Commission should consider granting a waiver only if it finds that the waiver “would not create the potential for undue influence or unfair advantage” and would further the purposes of the C&GCC.

Waiver requests are evaluated based on the facts that are provided in the request. These facts allow the Commission to evaluate whether a waiver is appropriate and must therefore be complete and accurate. Any waiver that the Commission grants is limited to the facts provided, and, should the facts change, the requestor should seek an updated waiver from the Commission.

Facts Presented in the Request

In her waiver request, Ms. Riedel describes her work history, previous role with the City, and her current role as Managing Director of the Station Operations Center at SFO working for United. Ms. Riedel was previously the Director of the Airport Integrated Operations Center (AIOC) for San Francisco International Airport (SFO) where she built and launched the AIOC as SFO’s centralized, 24/7 operations hub. Additionally, she was responsible for AIOC strategy, policy, and day-to-day oversight of operational conditions, mitigations, and issues across the Airport.

The work that necessitates the waiver request is serving as United’s primary liaison to federal and City agencies, specifically at SFO, which will include daily coordination with the AIOC on aircraft and passenger movement and, when needed, emergency or incident management. Ms. Riedel states that this coordination function is not unique to her or to United as every major carrier operating at the Airport maintains an operational point of contact to support the daily operations, responding to irregular operations, and coordinating on safety and emergency matters.

Should the Ethics Commission grant Ms. Riedel a waiver, she would be communicating with her former department, SFO, regarding operational and administrative matters. These communications will involve coordinating aircraft and passenger movement, sharing information for day-to-day operations, and participating in safety and emergency response coordination. Ms. Riedel has confirmed that these anticipated communications are administrative in nature and will not involve the awarding of contracts, leases, or similar agreements between United and the Airport.

Analysis

The Need for a Waiver to Perform the Duties Ms. Riedel Describes

Based on the facts presented in Ms. Riedel's waiver request, Staff agrees that a waiver for the one-year post-employment communication ban would be beneficial for Ms. Riedel to carry out the described duties of her current position with United.

Based on the guidance from Ethics Commission [Regulation 3.234-2](#), the one-year post-employment communication ban would apply to Ms. Riedel's new duties at United, since:

1. Ms. Riedel is a former City employee,
2. With less than one year elapsed since terminating her employment with the City, and
3. She would be communicating with her former department, SFO, with the possibility that those communications are intended to influence government decisions.

Ms. Riedel's communications will largely involve routine requests for information and ministerial actions, which are exempt from the communication restriction. However, the administrative and operational matters she would be communicating about could regularly constitute attempts to influence government decisions, which would be prohibited. Therefore, Staff believe that a limited waiver tailored to the activities described in Ms. Riedel's request would be appropriate.

Relevant Factors Regarding the Potential for Undue Influence or Unfair Advantage

As the Commission evaluates whether granting a waiver to Ms. Riedel would create the potential for undue influence or unfair advantage, [Regulation 3.234-4](#) identifies several factors the Commission may consider as part of its determination. These factors include: the nature and scope of the communications the individual will have, the subject matter of such communications, the former position held by the officer or employee, the type of inside knowledge that the individual may possess, and any other factors the Commission deems relevant. These factors are discussed below.

The nature, scope, and subject matter of the potential communications.

The primary purpose of the one-year communication prohibition is to prevent former City officials from leveraging their prior positions to get their foot in the door with the city or otherwise provide an unfair advantage to their new employers. In this instance, the request for potential communications involving Ms. Riedel originates from an operational function that is not unique to her or to United. Every major carrier operating at SFO maintains an operational point of contact that performs the duties described.

Moreover, these responsibilities are broad in scope and performed as a part of an established and structurally necessary operational function, rather than as means of advancing United's potential

interests before the City. To the extent Ms. Riedel's communications would be used to influence a governmental decision, those decisions would be primarily operational and administrative. Ms. Riedel also confirms that the anticipated communications are not intended to influence discretionary City decisions, such as contract awards, lease terms, or procurement outcomes and as such, she is not requesting that her potential waiver extend to such matters. These circumstances mitigate the risk of undue influence, while supporting the approval of a narrowly tailored waiver that would allow Ms. Riedel to perform her new role.

Inside knowledge Ms. Riedel may possess.

Ms. Riedel has stated in her waiver request that she has spent nearly three decades in commercial aviation operations, with over 15 years at SFO. Although Ms. Riedel possesses significant knowledge of AIOC's internal processes from her prior role as its Director, she has stated that this operational knowledge has been shared with the airline industry as a part of AIOC's function of providing carriers with a common operational framework. This information is therefore not confidential or competitively sensitive and would not provide United with any undue advantage over other carriers. Additionally, Ms. Riedel's knowledge of AIOC operations does not extend to contracting matters that are outside the scope of her waiver request.

Other factors that may be relevant.

United's SOC Managing Director has been required to coordinate daily with the AIOC per the operational realities of a joint-use international airport. It did not arise from, nor is it contingent on, Ms. Riedel's prior City employment. Additionally, the AIOC and United's SOC both operate under close federal regulatory oversight, which further constrains the discretion either side has in day-to-day coordination.

Although Ms. Riedel began her new position with United on August 31, her waiver request states that she is aware of the one-year communication ban and will be limiting her communication with the Airport until the Ethics Commission makes a final determination regarding her waiver request.

Recommendation

The Commission is asked to consider the potential for undue influence or unfair advantage if a waiver were to be granted. Based on the facts provided, Staff do not see strong evidence that Ms. Riedel's work and involvement in these communications would lead to either. The activity Ms. Riedel would like to engage in through her requested waiver is unlikely to give her current employer any undue influence or unfair advantage.

Staff recommend the Commission approve a limited waiver for Ms. Riedel. Such a waiver should be limited to only allow Ms. Riedel to participate in communications on behalf of her new employer, United, regarding the administrative and operational matters described in her waiver request as "solely regarding routine, day-to-day operational coordination and safety or emergency incident management, the ordinary functions of the SOC Managing Director role." Such a waiver would not apply to any communications regarding contracts, leases, procurement, gate or facility allocations, rates and charges, or other matters in which United has a direct financial or competitive interest before the Airport.

Staff would like to thank Ms. Riedel for her detailed waiver request, thoughtful communications throughout this process, and service to the City.

Attachments:

Attachment 1: [Waiver Request from Nancy Byun Riedel Dated August 16, 2026](#)

Attachment 2: [Informal Advice Provided to Nancy Byun Riedel on August 12, 2026](#)

ATTACHMENT 1

August 16, 2026

Patrick Ford
Executive Director
San Francisco Ethics Commission
25 Van Ness Avenue, Suite 220
San Francisco, CA 94102

Re: Request for a Limited Waiver of the One-Year Post-Employment Communication Restriction under San Francisco Campaign and Governmental Conduct Code Section 3.234(a)(2)

Dear Ethics Commission,

I write to request a narrow, position-specific waiver of the one-year post-employment restriction on communications with my former department, established by San Francisco Campaign and Governmental Conduct Code Section 3.234(a)(2). I am, until August 28, 2026, the Director of the Airport Integrated Operations Center ("AIOC") for San Francisco International Airport ("SFO" or the "Airport"), a department of the City and County of San Francisco. Effective August 31, 2026, I am joining United Airlines ("United") as Managing Director of the Station Operations Center ("SOC") at SFO.

This request follows a letter of advice I received from Commission staff dated August 12, 2026, which confirmed that only the one-year restriction on communicating with my former department is implicated by my new position. I am grateful for the letter's guidance on the option of seeking a waiver from the Commission, and consistent with it, I am submitting this written request.

As required by Ethics Commission Regulation 3.234-4(a)(1), I certify that I have provided a copy of this waiver request to Eva Cheong, Acting Chief Operating Officer, who is responsible for the day-to-day management of the Airport Integrated Operations Center.

Work History

I have spent nearly three decades in commercial aviation operations, with over 15 years at SFO.

I spent more than 22 years with United Airlines across several airports and departments, including station operations, ramp operations, vendor management, and United Express contract management at United's World Headquarters. I spent 15 of those years at United's SFO station operations, where I held every role from customer service through Shift Manager, later serving as United's Inflight Base Director at SFO.

I subsequently joined the City and County of San Francisco, as SFO's Director of the Airport Integrated Operations Center. In that role, I built and launched the AIOC as SFO's centralized, 24/7 operations hub, and I was responsible for AIOC strategy, policy, and day-to-day oversight of operational conditions, mitigations, and issues across the Airport. I reported to the Airport's Chief Operating Officer.

The New Position and the Need for a Waiver

As Managing Director of United's Station Operations Center at SFO, I will lead a team of more than 150 employees responsible for United's operational performance at the station, including flight scheduling, coordination with United's Network Operations Center, and station safety and security. **A core function of this role, confirmed in United's own job description for the position, is to serve as United's primary liaison to Federal and City agencies, which will include daily coordination with the AIOC on aircraft and passenger movement and, when needed, emergency or incident management.**

This coordination function is not unique to me or to United. Every major carrier operating at SFO maintains an operational point of contact responsible for communicating routinely with the AIOC to support the Daily Operations Plan, responding to irregular operations, and coordinating on safety and emergency matters. The AIOC itself was built to serve as this kind of common operating picture for the entire airline community, not for any single carrier. Therefore, the need for United's SOC Managing Director to communicate with the AIOC is structural to how SFO operates today and exists independent of who holds that position.

As confirmed in the Commission staff's advice letter, these anticipated communications are administrative in nature and will include daily operational coordination, performance and KPI reporting, and safety or emergency response coordination. These communications will not involve the awarding of contracts, leases, or similar agreements between United and the Airport.

Scope of Waiver Requested

I request a limited waiver permitting me to communicate with AIOC and other Airport personnel solely regarding routine, day-to-day operational coordination and safety or emergency incident management, the ordinary functions of the SOC Managing Director role as described above. I am not requesting, nor do I not need, any waiver to communicate regarding contracts, leases, procurement, gate or facility allocations, rates and charges, or other matters in which United has a direct financial or competitive interest before the Airport. Those matters may remain subject to the full one-year restriction under Section 3.234(a)(2), and I will route any such matters to other United personnel who are not subject to the restriction.

No Undue Influence or Unfair Advantage

Under Section 3.234(c)(1), the Commission may grant this waiver if it determines that doing so would not create the potential for undue influence or unfair advantage. I believe the facts here support that finding.

The nature and scope of the communications. I seek a waiver only for communications that are operational and administrative in nature, such as coordinating aircraft and passenger movement, sharing information for the Daily Operations Plan, and participating in safety and emergency response coordination. These are not communications intended to influence discretionary City decisions, such as contract awards, lease terms, or procurement outcomes.

Subject matter. The subject matter mirrors exactly what any airline's station operations leadership must discuss with the AIOC as a matter of course, and what I discussed with counterparts at other carriers when I served in the AIOC role. Nothing about the subject matter of these communications is exclusive to my prior City position.

My former position and inside knowledge. While I held significant knowledge of AIOC's internal processes as its director, that operational knowledge has been shared with the airline community as a matter of transparency. It is not confidential nor competitively sensitive information that would advantage United over other carriers. The AIOC's stated purpose is to give the entire airline community a shared, common operating picture. Though I may be familiar with how that picture was built, my operational knowledge of the AIOC will not translate into an unfair advantage in matters of contracting, leasing, or resource allocation matters, which fall outside the scope of the waiver I am requesting.

Other relevant factors. As United stated in its job description for the position, United's SOC Managing Director has been required to coordinate daily with the AIOC per the operational realities of a joint-use international airport. It did not arise from, nor is it contingent on, my prior City employment. Further, the AIOC and United's SOC both operate under close FAA and TSA regulatory oversight, which further constrains the discretion either side has in day-to-day coordination. Granting this waiver would simply allow me to perform the same liaison function that my predecessor performed and which counterparts at other airlines already perform.

Timing

I understand the earliest the Commission could consider this request is at its regularly scheduled meeting on September 11, 2026. Because my new position begins August 31, 2026, I will limit my communication with the Airport in the interim. Until the Commission has acted on this request, any such communications will be limited to routine requests for publicly available information and matters that are solely ministerial or clerical as those are permitted without a waiver. I would welcome the opportunity to attend the September 11 meeting to answer any questions, and I am available to Commission staff before then as well.

Thank you for your consideration.

Sincerely,

Nancy Byun Riedel

Managing Director, Station Operations Center, United Airlines (effective August 31, 2026)

Former Director, Airport Integrated Operations Center, San Francisco International Airport

ATTACHMENT 2

Copy of Informal Advice Provided to Nancy Byun Riedel via Email

To: Nancy Byun Riedel

From: Ryan Abusaa

Sent: 8/12/2026

Hi Nancy,

Thank you again for the information you have provided in connection with this question. We appreciate your reaching out to the Ethics Commission for advice and are happy to clarify the rules around post-employment restrictions as they pertain to your situation.

Background

You currently work for the Airport as the Director of the Airport Integrated Operations Center (“AIOC”). On August 28, 2026, you will be leaving City service. You have accepted a new position with United Airlines (“United”) which you will start on August 31, 2026. With United, you will be serving as the Managing Director of the Station Operations Center (“SOC”).

United is the largest airline operating at the San Francisco airport, and the Managing Director of the SOC serves as the primary point of contact for all operational discussions between the Airport and United. The position works directly with AIOC for daily coordination of aircraft and passenger movement, and potential emergency or incident management, and thus requires daily communication with Airport officials as part of its standard job duties. The nature of these communications does not otherwise involve the awarding of contracts, leases, or similar agreements.

As such, your position with United will require you to communicate with your former department, the Airport, and those communications would be both administrative in nature and with intent to influence some governmental decisions.

You have asked for advice regarding whether your employment with United and the anticipated communications described are prohibited by the City’s rules.

Summary of Applicable Laws

The City’s rules regarding Post-Employment and Post-Service Restrictions can be found in [Section 3.234 of the Campaign and Governmental Conduct Code](#) and in [Ethics Commission Regulations 3.234 -1 through 3.234-5](#).

The City has rules for all officers and employees post-employment, these rules include: 1) a permanent restriction on representing any other person (except the City) before any court or government agency in connection with particular matters in which you were personally and substantially involved, 2) a one-year restriction on communicating with your former department with the intent to influence a government decision, and 3) a prohibition on employment with parties that contract with the City. Waivers for these first two rules may be issued by the Ethics Commission if the Commission determines that granting a waiver would not create the potential for undue influence or unfair advantage. Waivers for the third rule may only be issued if the Commission determines that imposing the restriction would cause extreme hardship for the City officer or employee.

For the one-year communication restriction: former employees or officers of the City and County are prohibited, for a period of one year after the termination of their service or employment, from communicating orally, in writing, or in any other manner on behalf of any other person (except the City and County) with the department, board, commission, office, or other unity of government in which they served with the intent to influence a government decision. This restriction includes decisions in which the officer or employee had no prior involvement as well as decisions related to matters that first arise after the officer or employee has left City service.

As outlined in Regulation 3.234-5, a communication is deemed to be made with “intent to influence” when it is made for the purpose of supporting, promoting, influencing, modifying, opposing, delaying, or advancing a governmental decision. There are exceptions to the rule when:

1. a communication involves only routine requests for information (such as a request for publicly available documents),
2. the previous employee or officer participates as a panelist or speaker at a conference or similar public event for education purposes or to disseminate research and the subject matter does not pertain to a specific action or proceeding,
3. the previous employee or officer attends a general informational meeting, seminar, or similar event,
4. the previous employee or officer communicates with the press, or
5. the previous employee or officer seeks to influence an action that is solely ministerial, secretarial, manual, or clerical.

Otherwise, the previous employee or officer is prohibited from communicating with their former department with intent to influence a government decision. Government decisions

are broadly defined and include whenever a City officer or employee votes on a matter, appoints a person, obligates or commits the City to a course of action, enters the City into a contractual agreement, or determines not to do any of the above.

Application of Relevant Laws

The following applies the relevant provisions of the law to your situation and examines if a waiver would potentially be necessary for you to accept and perform the duties of the Managing Director position at United. Please note that the “Permanent Restriction on Representation In Particular Matters” and “Employment With Parties That Contract With The City” provisions of Section 3.234 are not relevant based on the information you provided. Thus, only the “One-Year Restriction on Communicating with Former Department” provisions are relevant to your situation.

One-Year Restriction on Communicating with Former Department

For the twelve months following the termination of your employment with the City, this rule would prohibit you from communicating with the Airport or any Airport officials on behalf of United or any other entity with the intent to influence a government decision. Determining if a specific communication is attempting to influence a City official would be fact specific.

Based on the information provided and the application of the relevant provisions of law, you have several options:

1. You could avoid any communications with the Airport for the 12 months after you leave City service, this would not prevent others at United from communicating,
2. You could communicate with the Airport within the first 12 months, but avoid having any such communications be made with an intent to influence a government decision, or
3. You could request a limited waiver from the Ethics Commission, which would allow you to communicate with Airport officials in your new role, on behalf of United, even when those communications may at times be intended to influence a governmental decision.

Of the options above, the first and third options provide the lowest level of risk of potentially violating the one-year communication prohibition. Following our conversation, you confirmed your interest in the third option, so instructions for requesting a waiver are provided below.

Waiver Process

Given the above, you may wish to request a waiver for your new role with United. Under Code [Section 3.234\(c\)](#), the Ethics Commission may waive the restrictions in Section 3.234(b)(1) if the Commission makes a finding that that granting a waiver would not create the potential for undue influence or unfair advantage. A request for a waiver must be in writing and must also certify that you have provided a copy of the waiver request to the City officer or employee responsible for the day-to-day management of your department, board, commission, office, or unit of government ([Ethics Commission Regulations 2.234-4\(a\)\(1\)](#)).

The waiver request must include all the following:

1. Information describing the former position held by the employee,
2. The particular matter for which the waiver is sought,
3. The individual's prior involvement in the matter, if any, and
4. Reasons why granting a waiver would not create the potential for undue influence or unfair advantage. [EC Reg. 3.234-4\(a\)\(1\)](#),

In making its determination whether or not to grant a waiver, the Commission may consider:

1. The nature and scope of the communications,
2. The subject matter of such communications,
3. The former position held by the employee,
4. The type of inside knowledge that the individual may possess, and
5. Any other factors the Commission deems relevant.

The general outline of the Commission's waiver process is as follows:

1. Commission Staff receives waiver request.
2. Staff drafts memo recommending approval or denial of waiver.
3. Item agendaized for either of the Ethics Commission's next two regular meetings. [EC Reg. 3.234-4\(a\)\(3\)](#).
4. Regular Commission meeting

4.

- a. Commission calls waiver agenda item in open session.
- b. Staff will summarize the law and their recommendation.
- c. Requestor will make their presentation.

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- i. Requestor will be given time (usually 3-5min. The Commission may grant further time at its discretion) to present the request.
- ii. Requestor should lay out the reasons showing that *a waiver would not create the potential for undue influence or unfair advantage* using the factors laid out in [*EC Reg. 3.234-4\(a\)\(4\)*](#).
- d. A designated representative of the public agency may make a presentation to the Commission supporting or opposing the waiver request. [*EC Reg. 3.234-4\(a\)\(3\)*](#).
- e. Commission will seek clarifications from requestor and ask them to address or otherwise acknowledge factors laid out in the regulations to specify approval or denial of the request.
- f. Commission discussion of waiver request.
- g. Commission motion on how to resolve waiver request.
- h. Public comment on Commission motion.

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- i. Requestor may ask that supporters make presentations during this time.
- i. Commission vote to approve or deny waiver.

5. Commission Staff will draft and submit to Requestor an approval or denial of the waiver based on the Commission's motion.

Due to the timing of this request, the earliest the Commission could consider a potential waiver request would be at its next regularly scheduled meeting on September 11th, 2026.

Given the broad nature of the rule, and your start date of August 31st, 2026, you should exercise great caution with involvement in any communications to your former department, particularly those that may fall into the realm of potentially influencing a government decision. Until a waiver is potentially granted, you should avoid communications with the Airport or limit your communications with the Airport to basic requests for information and topics that are solely ministerial, secretarial, manual, or clerical in nature. Should topics arise where the intent is to support, promote, influence, modify, oppose, delay, or advance a governmental decision, you should abstain from any involvement in such communications. You can also seek further advice regarding any specific meetings or communications before participating, if you are uncertain if your participation would be permitted.

As with all advice provided by the Ethics Commission, this advice is based on the facts provided and is specific to you and this situation. If the facts provided are incomplete, inaccurate, or change, this advice may not apply and new advice may need to be issued.

Thank you. Please let me know if you have any questions or would like to submit a waiver request.