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November 30, 2018

VIA E-MAIL AND U.S. MAIL

Robert B. Hodil
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Re: Conflict of Interest Issues Regarding City Council Member-Elect Susan Candell with Respect to the Terraces of Lafayette Apartment Project

Dear Rob:

Along with Allan Moore of Wendel, Rosen, Black & Dean LLP, we represent O'Brien Land Company, LLC and Anna Maria Dettmer in connection with the above-referenced 315-unit affordable apartment project, the application for which was "deemed complete" in 2011, pursuant to the Permit Streamlining Act (Cal. Govt. Code § 65920 *et seq.)* ("**Project**").

Given the inherent sensitivity in raising such issues, we write with significant reluctance to address the unequivocally-expressed bias of newly elected City Council member Susan Candell with respect to the Project. We are compelled do so because Ms. Candell has been a long, frequent, and ardent adversary of the Project dating at least as far back as 2012 when the City was processing the Project's draft Environmental Impact Report ("**EIR**"). Unfortunately, Ms. Candell's many public statements, including those throughout the summer of 2018 on the cusp of—and even during—her campaign, make clear that she is irretrievably biased against the Project. In addition, she has made clear she also holds material animosity to our clients.

Ms. Candell's dogged opposition easily exceeds the minimum legal standard for disqualification—"an unacceptable probability of actual bias." *See*, e.g., *Nasha v. City of Los Angeles*, 125 Cal.App.4th 470, 483 (2004). Moreover, the representative evidence shown below establishes that Ms. Candell has repeatedly crossed far beyond that critical minimum legal threshold. Indeed, the evidence shows that she is unequivocally and *actually* biased against the Project and has worked tirelessly to attempt to cause its failure.[1]

[1] The evidence referenced in this letter omits many other statements Ms. Candell has made regarding the Project demonstrating her vehement opposition to it, and it omits almost the entirety of an equally if not more voluminous body

Thus, while we certainly wish Ms. Candell a successful tenure on the City Council generally, for the reasons explained herein she cannot—without violating our clients' constitutional rights to due process and statutory rights to fair procedure—lawfully participate in any part of the City's consideration of the Project, whether in an open and noticed public meeting, in a publicly noticed closed session, in private meetings or conversations with City officials or staff, or otherwise.

FACTS

Ms. Candell's opposition to the Project manifests itself in numerous ways. For example, she has characterized the Project as a catalyst for her desire to run. Her campaign website (https://www.susancandell.com/) admits that:

> "My intense civic involvement began 5 years ago with the Deer Hill project, first as 315 Apartments then with 44 Homes. As an engineer, when faced with complicated problems, I knew it was time to roll up my sleeves and delve into the mountain of paperwork for the Homes project. When I discovered that the cancer risk to students at Acalanes High School during construction of the Homes was above allowed limits, I instantly called my friend whose daughter at Acalanes is a cancer survivor, and explained what I had found. She said, 'We have to stop this, Susan.' That's when Mama Bear came out, and my deep civic involvement began."
> (Attachment 1).

Consistent with that voluntary public admission, Ms. Candell explained to the *Lamorinda Weekly*, in an article published September 19, 2018, that "[t]he 315 Apartments at Deer Hill will cause irreparable harm to the environment and gridlock. Lafayette urgently needs to be proactive." (Attachment 2). While this statement alone exceeds the standard the courts have established for constitutionally impermissible bias requiring recusal, there is much more in the same vein.

Predating her run for office by more than half a decade, on January 16, 2012 Ms. Candell signed a petition opposing the Project (signature #86). (Attachment 3). The petition was submitted to the City and made a part of the administrative record for the EIR. Former City Councilmember Traci Reilly signed the same petition (signature #441) and, as explained in the minutes of the City Council's December 9, 2013 meeting,[2] properly recused herself from all aspects of the Project as a result. (Attachment 4).

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of opposition to The Homes at Deer Hill project alternative, which was ultimately defeated in a ballot referendum following a change in the law. *See City of Morgan Hill v. Bushey*, __ Cal.5th __ (2018) (Case No. 243042) ("The Court of Appeal's decision here constituted a change in law . . . ."). Ms. Candell was a key participant and community leader in the "Vote NO on Measure L!" campaign. Although we cannot imagine additional documentation is needed to demonstrate Ms. Candell's probable bias beyond that which is provided with this letter—much less her actual bias— if the City requires more evidence, we are prepared to provide it.

[2] Agenda item 9(B) "Council Reorganization"

On January 7, 2013, Ms. Candell wrote the City a technical letter identifying an earthquake that occurred on the Project site in 2007. (Attachment 5).

Later the same year, on August 5, 2013, Ms. Candell signed another petition urging the City to "approve the FEIR, with its 13 significant and unavoidable impacts." Apparently thinking it would be more difficult to approve a project with additional impacts, she added "that it would be even better if you instead adopt[ed] the Resolution as written by Eliot Hudson" showing 16 significant and unavoidable impacts. (Attachment 6).

Similarly, on August 7, 2013, Ms. Candell wrote a letter to the City Council opposing the Project and asserting, among other things, that the potential of children living in the Project crossing Deer Hill Road "**is clearly a very new and HUGE safety issue. Deer Hill Road is blind. This is an accident waiting to happen.**" (Attachment 7; emphasis in her letter).

And this year, during the summer months leading to her eventual candidacy for the City Council as well as during her campaign, when she might have realized the need to appear to be open-minded with respect to the Project, Ms. Candell attended and spoke at several City Council meetings—including those of June 11, 2018[3] and June 25, 2018[4]—urging the Council to take steps she hoped would kill the Project, including quickly rezoning the Project site, scheduling emergency meetings on 24 hours' notice, and hiring additional outside counsel (i.e., someone other than the long-tenured and well-qualified City Attorney with whom Ms. Candell and other staunch Project opponents have baselessly disagreed about the City Attorney's correct legal advice)[5] to assist the City in its handling of the Project. (Attachment 8 and Attachment 9).

On June 28, 2018, Ms. Candell co-authored (along with Scott Sommer, another active and vocal project opponent) a lengthy technical letter to the City Council and Planning Commission, maligning the "integrity and reputation" of the City's environmental consultant for the Homes at Deer Hill project and arguing that "[a]s concerned citizens, we respectfully submit that the city should select a new qualified EIR consultant for the supplemental environmental work that will be required for the resubmitted Terraces (315 Apartments) application" and that "[t]he Terraces project is an enormous project as compared to the Homes." (Attachment 10).

On July 1, 2018, Ms. Candell provided the City Council another letter, regarding the Council's July 3, 2018 agenda item 7(B) ("Consideration of Appointing Additional Legal

[3] Agenda item 8(A) "Rezoning options for property located at 3233 Deer Hill Road, APN 232-150-027, also known as the "Terraces of Lafayette" and "Homes at Deer Hill" and consideration of potential changes to the general plan designation"

[4] Agenda item 5 "Public Comments"

[5] Examples include (1) Ms. Candell's and other Project opponents' disagreement with the City Attorney's correct determination in December 2015 that the referendum was invalid under *deBottari v. City Council*, 171 Cal.App.3d 1204 (1985), before the law changed; (2) the City Attorney's correct determination that the Process Agreement was valid; and (3) the City Attorney's correct determination that the Permit Streamlining Act is intended for the protection of project applicants and does not operate to cause project denials, the latter two of which you also correctly informed the City Council of during its August 13 meeting (see Attachment 13).

Counsel Regarding Terraces Apartment Project located at 3233 Deer Hill Road"), writing that "[i]n addition, this counsel must have a [sic] very strong arguments for defending the city against the 315 apartments proposal . . . Through the efforts by so many citizens, the City of Lafayette effectively 'set back the clock' for this property. This happened with the defeat of Measure L, proving that the Alternative proposal was also not acceptable for this site." (Attachment 11).

Ms. Candell also addressed the City Council on August 13, 2018,[6] on the same day she filed her official "Candidate Statement of Qualifications" (Attachment 12), to say she "was not sure the Council was finished with this topic, stating the EIR disclosed 13 significant and unavoidable impacts, 5 of which are health and safety and are likely to be the ones investigated under the HAA and see what it would take to make those findings" (i.e., to deny the Project). At the same meeting she stated that the "health and safety impacts of the Terraces dwarfs the Homes at Deer Hill effort . . . The one out of five health and safety impacts which [sic] is the largest is the 30,000 dump truck trips from this site as the hillside is decimated." The minutes for that meeting show that Councilmember Anderson disclosed he had recently met about the Project with Ms. Candell and other active project opponents. (Attachment 13).

Ms. Candell has also posted many statements on Nextdoor (a social networking service for neighborhoods) (a selected and more detailed partial summary of which is included as Attachment 14), including the following:

- "A CEQA lawsuit can be filed if, for example, our city approves the Terraces project in its current form with its 13 significant and unavoidable impacts. Since the HAA may also be at play, if any of the 5 health or safety impacts can be shown to be significant, the project can also be denied. What the issue is TONIGHT is whether the city retains the land use expert attorney to defend that the project also violates the general plan . . . ."
- "It's an overlooked fact that the Terraces Apartments were not totally in compliance with General or Site Specific zoning . . . ."
- "Is O'Brien from Hillsborough somehow our new neighbor? I was cracking up!"
- "I'm also against a developer who has threatened so much that he has kept our city held as hostage for 7 years. I believe the reasoning by Save Lafayette's attorney that we are no longer hostage by Apartments."
- There are many totally valid ways of fighting the 315 Apartments . . . ."

[6] Agenda item 13B(2) "Discussion Regarding Release of Memo from Coblentz Patch Duffy & Bass LLP"

- "City Council Must Not Give Away the 315 Apartments Project to Developer . . . ALL of these efforts will be wasted with a single wrong legal move by the City of Lafayette before July 15 in response to the Terraces Application . . . ."

- "The only way to 'change' the Terraces project and remove these Significant and Unavoidable Impacts is to submit a brand-new project, and then start from the beginning and generate a new EIR. The Terraces project that was just resubmitted does not change anything."

- "I hope the developer comes up with a new proposal that doesn't involve 30,000 dump trucks."

- "[D]uring this unapproved time between when the Homes project started and now, Lafayette's General Plan changed, so there is now a mismatch with the APO zoning for that site and the General Plan. A re-zoning will need to happen to fix this, which is then subject to the referendum process just like was done for the Homes. I feel now extremely confident that we citizens will rise to the vote if the 315 Apartments project comes back!"

- "Same legal issues as the 315 Apartments - a zoning change would need to occur, so again our rights to petition for a referendum works for that too!"

- "[A] No vote will better serve both the historic goals of our community as well as better position us for future challenges[.]"

- "A huge project like Deer Hill . . . ."

- "These next 15 days are CRITICAL. The city must immediately retain legal counsel experienced in land use law, municipal law, and litigation to properly handle the re-zoning and the resubmitted 315 Apartments."

- "[T]wo very important documents need to be produced, the first on [sic] by July 15 in response to the developers resubmission of the 315 apartments, and the other to defend the new rezone."

- "[O]ur Hillside Ordinance, which applies to this site, dictates R65 as the appropriate zoning for this very hilly site."

- "A new lawyer has been hired to get a second opinion, and is very likely to be in opposition to our City Attorney on this exact issue. What we can do - all of this is happening BEHIND CLOSED DOORS, ALONG WITH MEETINGS WITH THE DEVELOPER. WE PUBLIC HAVE NO IDEA AND NO INPUT TO THIS PROCESS. For a matter that clearly has SO MUCH AT STAKE, BOTH IN TERMS OF MONEY AND TIME FOR OUR CITY, IT IS EGREGIOUS THAT THEY CONTINUE TO HOLD MEETINGS BEHIND CLOSED DOORS. It appears it is still 'process as usual' for our City. Secret meetings with developer are happening this week . . . Please, everyone start

demanding that for any change in the current Apartments legal strategy or any change to the Project, including new EIR be discussed in OPEN SESSIONS [sic]."

- "The rezone in 2010 was legal, but not implemented because of failed legal advice. The citizens set back the clock, and this time the rezone by Planning Commission is R65, or 14 Homes, up from the R5 in 2010, or 5 Homes. The vote on that comes back next week. Everything the city is doing this time so far is legal and defensible, but two very important documents need to be produced, the first on by July 15 in response to the developers resubmission of the 315 apartments, and the other to defend the new rezone. These documents must be perfect and they must be quick. An independent counsel with land use expertise can create these. Written well and lawsuits could be averted. Written poorly and lawsuits will fly. Our current attorney is not a land use expert, and Ivor Samson has found the perfect person who can jump in after the vote tonight. This will be money well spent! Please support Ivor and his choice! He is the only attorney on Council, and we are very lucky to have him!"

- "The basic problem for BOTH Apartments and Commercial developments on this site is that the General Plan was modified in 2015 to specify "Low Density" single-family residences for this parcel, which is inconsistent with both Apartments and Commercial projects. So in order for either of them to be approved, the General Plan would have to be modified back to APO as well, and this is a legislative act that is subject to referendum. We citizens that don't want either a big apartment or commercial development there can petition to get it on the ballot and vote against it."

- "The new state housing laws don't effect this site, and Deer Hill was never part of Lafayette's Housing Element. If the developer does try to change anything with that site application, we as citizens still have our rights to petition for a referendum, again. The fear factor over the apartments is what seems to be still driving people's decisions, but if you read Scott's posts, this is simply not true anymore."

PROCEDURAL DUE PROCESS AND APPLICABLE LEGAL STANDARDS

Ms. Candell's extensive comments on and opposition to the Project in light of her pending role on the City Council must be framed in the proper legal context because they directly impact our clients due process rights.

The Due Process Clause of the U.S. Constitution provides that "nor shall any state deprive any person of life, liberty, or property, without due process of law . . . ." U.S. Const. amend. XIV, section 1. The equivalent provision in the California Constitution provides that "[a] person may not be deprived of life, liberty, or property without due process of law . . . . Cal. Const. art. I, section 7. Code of Civil Procedure section

1094.5 similarly mandates that an applicant for a use permit receive a fair hearing. *See, e.g., Applebaum v. Board of Directors*, 104 Cal.App.3d 648, 657-58 (1980) (biased decision makers are constitutionally impermissible and even the probability of unfairness is to be avoided).

Numerous cases address whether procedural due process—the requirement that public entities conduct hearings in a fair manner with neutral and unbiased decision-makers— is provided when a member of an adjudicatory body considering a discretionary, quasi-judicial decision is, or may be, biased against a party. *See, e.g., Woody's Group, Inc. v. City of Newport Beach*, 233 Cal.App.4th 1012, 1022-23 (member of city council "strongly opposed" to planning commission decision appealed the commission's decision to the council); *Nasha v. City of Los Angeles, supra*, 125 Cal.App.4th 470, 483 (member of planning commission wrote article "attacking" project under consideration; member held biased, and commission's decision reversed); *Clark v. City of Hermosa Beach, supra*, 48 Cal.App.4th 1152, 1173 (1996) (city council member should have recused himself because proposed project had "direct impact" on the "quality of his own residence"); *Gai v. City of Selma*, 68 Cal.App.4th 213, 219 (1998) (member of personnel commission investigating officer's discharge should have recused himself because he was actually biased against officer); *Mennig v. City Council*, 86 Cal.App.3d 341, 351 (1978) (members of city council who became personally "embroiled" in conflict with police chief should have recused themselves on question of discipline of police chief).

The courts have repeatedly held that procedural due process applies to land use permitting. *See, e.g., Woody's Group, Inc. v. City of Newport Beach, supra*, 233 Cal.App.4th at 1021-23; *Clark v. City of Hermosa Beach, supra*, 48 Cal.App.4th at 1170-73; and *Nasha v. City of Los Angeles, supra*, 125 Cal.App.4th at 483-84. Procedural due process always requires a level playing field, the so-called "constitutional floor" of a fair hearing in a fair tribunal—in other words, a fair hearing before a neutral and unbiased decision-maker:

> "[I]n order to prevail on a claim of bias violating fair hearing requirements, Nasha must establish 'an unacceptable probability of actual bias on the part of those who have actual decisionmaking power over their claims.' " [citation] A party seeking to show bias or prejudice on the part of an administrative decision maker is required to prove the same "with concrete facts: '[b]ias and prejudice are never implied and must be established by clear averments.' "
>
> *Nasha v. City of Los Angeles, supra*, 125 Cal. App. 4th at 483 (quoting *BreakZone Billiards v. City of Torrance*, 81 Cal.App.4th 1205, 1236 (2000)).

Thus, to prevail on a procedural due process claim, actual bias is not required. Instead, such contention must simply be established by showing that there is "an unacceptable probability of actual bias" on the part of those who have actual decision-making power over the issue at hand.

RELEVANT CASES ADDRESSING BIAS

Nasha v. City of Los Angeles, one of several leading cases in this area, made clear that allowing a biased decision-maker to participate in a discretionary decision is enough to invalidate the decision. There, a city planning director approved a five-residence development project. A neighbor and a conservancy appealed the decision to the planning commission.

Prior to the hearing by the commission, however, one of the planning commission members wrote an unsigned article in a local homeowner's association newsletter advocating "a position against the project" because he perceived the project to be a threat to wildlife migration patterns. He also spoke against the project at a neighborhood association meeting, while asserting that "I feel I can make a fair and impartial decision regarding this matter."

The developer subsequently sought a writ of mandate to overturn the planning commission decision, but the trial court denied it. The Court of Appeal reversed, concluding the planning commission's decision was "tainted by bias and must be vacated," with directions to the trial court to issue an order to the planning commission to reconsider the appeal before "an impartial panel." The *Nasha* Court held the developer had established "an unacceptable probability of actual bias" on the commission member's part.

In particular, the Court was persuaded that the newsletter article alone constituted the concrete fact (singular) necessary to prove an "an unacceptable probability of actual bias." The article was printed in the Court's decision and Court added the italics to signify the troubling language:

> "**MULTIVIEW DRIVE PROJECT THREAT TO WILDLIFE CORRIDOR** [¶] A proposed project taking five legal lots totaling 3.8 acres for five proposed large homes with swimming pools served by a common driveway off Multiview Drive is winding its way through the Planning process. [¶] After wildlife leaves Briar Summit heading eastward they must either head south towards Mt. Olympus or north to the slopes above Universal City. *The Multiview Drive site is an absolutely crucial habitat corridor.* Please contact Paul Edelman with the Conservancy at 310/ . . . or Mark Hennessy who lives adjacent to the project at 323/ . . . if you have any questions."
> (Emphasis in original).

Thus, the Court did not care that the article was unsigned when it appeared in the newsletter. Moreover, the offending portion is somewhat generic in content and tone, which indicates the very low bar with respect to the evidence required to establish an "unacceptable probability of actual bias," which, as noted above, is the relevant legal standard, *not* actual bias.

The evidence of probable bias was more extensive in *Clark v. City of Hermosa Beach*. There, a city council member was held to be biased in connection with a vote denying a condominium project where the council member: (1) prior to being elected had opposed a prior iteration of the project and had appealed the project approval from the planning commission to the city council; (2) resided in an apartment in proximity to the project site; and (3) had demonstrated hostility to the project applicants by urinating on their property and periodically making loud noises in the immediate vicinity of the applicants' property disrupting their quiet enjoyment.

The Court held that the combined effect of these factors was sufficient evidence to warrant a conclusion that the council member could not be an impartial decision-maker and that the council's decision was tainted by his participation. The *Clark* case is farther along the spectrum from *Nasha* in terms of the quantum of evidence a court has relied on to conclude there was impermissible bias. It is useful to note, however, that the courts evaluate all types of indications when determining whether evidence shows an "unacceptable probability of actual bias." In any event, the quantum of evidence of Ms. Candell's bias against the Project is overwhelming and far surpasses the evidence sufficient to meet the legal standards of both *Nasha* and *Clark*.

In sum, the common law rule against bias has been framed in terms of probabilities, not certainties. The law does not require the disappointed applicant to prove actual bias. Rather, a common law conflict of interest will exist where there is concrete evidence that a decision-maker has by words, actions, or otherwise demonstrated that he or she has demonstrated an "unacceptable probability of actual bias" prior to conducting an adjudicatory public hearing on a project.

ANALYSIS

As a private citizen, we acknowledge that Ms. Candell had a right to exercise her free speech and petition rights in opposition to the Project. Our clients have never suggested otherwise, and have never hinted at, much less taken action toward, trying to limit her expression of those rights. In her role as an elected official, however, Ms. Candell will no longer be acting in the capacity of private citizen. Once sworn into office, she will be a voting member of a legislative body charged with fairly considering the Project under the law. And the law requires Ms. Candell to be unbiased on a wide range of subjects—including the Project—or to recuse herself in the event "concrete facts" undermine her neutrality, as they objectively do here.

While the law does not require proof of actual bias, there must not be "an unacceptable probability of actual bias" on the part of a municipal decision-maker or potential decision-maker such as Ms. Candell. *Nasha v. City of Los Angeles*, *supra*, 125 Cal.App.4th at 483. Probable bias alone is enough to show a violation of the due process right to fair procedure. Unfortunately, Ms. Candell is not only probably biased against the Project, she is actually biased.

> ***"The language of the law is replete with synonyms for fairness: due process, equal protection, good faith, harmless error are all ways of expressing our commitment to fairness."***
>
> *Woody's Group, Inc. v. City of Newport Beach*, *supra*, 233 Cal.App.4th at 1016.

As shown herein, with but a partial representation of Ms. Candell's tenacious and unrelenting Project opposition, for more than five years she has committed extensive time and effort attempting to thwart the Project as well as The Homes at Deer Hill project alternative that was ultimately defeated by a referendum petition in part through her efforts. Among other things, Ms. Candell signed two petitions against the Project. She has also spoken against the Project at numerous public meetings, written lengthy correspondence regarding the Project to the City Council detailing her many objections to it, written about the Project on social media sharing her strident and unwavering objections, and has emphasized the Project's role in igniting her community activism and eventual decision to pursue local elected office. Her firmly held position against the Project and her animosity to our clients could not be clearer.

Ms. Candell's well- and frequently-publicized opposition began years ago, it continued throughout the summer before she ran for City Council and during her successful campaign, and it endures today in the waning days before she will be asked to take the following oath of office:

> "I, Susan Candell, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of California against all enemies, foreign and domestic; that I will bear true faith and allegiance to the Constitution of the United States and the Constitution of the State of California; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties upon which I am about to enter . . . ."

We take Ms. Candell at her word. As shown by the voluminous evidence we have provided, Ms. Candell has expressed extraordinary, long-held, and unshakeable views for an elected decision-maker who might possibly claim to be unbiased regarding the Project. But these are not the typical statements of a person who can credibly maintain any semblance of impartiality. Rather, they are the statements of a tenacious and committed Project opponent, someone who has become deeply embroiled in the issue and long ago made up her mind that the Project must be denied. Thus, this is not a close case under any legal standard, including those established by *Nasha* and *Clark*. We have long known that Ms. Candell disapproves of the Project and would never support it, thus any possible assertion to the contrary belies the objective facts.

And the facts indisputably show that Ms. Candell has crossed the legal threshold of "an unacceptable probability of actual bias," which is all that is needed to require her recusal, and that she is in reality unequivocally, actually, and unapologetically biased against the Project. Thus, even if the Project were not being processed under the

stringent and powerful requirements of the Housing Accountability Act, which severely limits the circumstances under which it could lawfully be denied, our clients are entitled to due process, including consideration and action by fair and open-minded City officials who have not actively, frequently, and directly opposed the Project. Ms. Candell cannot "unring this bell," and we are not aware of any publicly available evidence that she has ever tried to do so.

While Ms. Candell appears well-qualified to represent the City in many of its varied interests generally, she cannot credibly claim to be anything other than a resolute Project opponent, and she thus cannot represent the City *in any capacity* regarding the ongoing processing of the Project, whether in a noticed public meeting, closed session, or otherwise, including in any meetings or communications with City staff or her future Council colleagues.

As noted above, former City Councilmember Reilly appropriately recused herself several years ago, out of an abundance of caution, merely because she signed a single petition against the Project, as a private citizen prior to her election. We expect Ms. Candell to exhibit similar ethics and concern for the City's integrity and legal exposure given her own vastly more extensive, impassioned, and demonstrable opposition to the Project.

CONCLUSION

For all of the foregoing reasons, while we must reluctantly raise these uncomfortable issues given the substantial constitutional and statutory rights at stake, we respectfully request—and, indeed, must demand—that Ms. Candell recuse herself from participating in any part of the City's ongoing processing of the Project and indicate publicly, on the record, that she has so recused herself.

Sincerely,

MILLER STARR REGALIA

Bryan W. Wenter, AICP

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Attachments:
1. Portion of Susan Candell campaign website.
2. September 19, 2018 *Lamorinda Weekly* article.
3. 2012 petition and relevant signature pages.
4. Relevant portion of December 9, 2013 City Council minutes.
5. January 7, 2013 letter.
6. 2013 petition and relevant signature pages.
7. August 7, 2013 letter.
8. Relevant portion of June 11, 2018 City Council minutes.

9. Relevant portion of June 25, 2018 City Council minutes.
10. June 28, 2018 letter.
11. July 1, 2018 letter.
12. Candidate Statement of Qualifications.
13 Relevant portion of August 13, 2018 City Council minutes.
14. Selected Nextdoor posts.

cc: Honorable Mayor Don Tatzin and City Councilmembers
Steve Falk, City Manager
Dennis O'Brien
Caryn Kali
Dave Baker
Anna Maria Dettmer
Allan Moore, Esq.
Arthur F. Coon, Esq.