

From: [Brian Doyle](#)
To: [Ruthann Ziegler](#)
Cc: [Deanna Santana](#); [Nora Pimentel](#)
Subject: RE: San Francisco Forth Niners Management Company--Form 700s
Date: Tuesday, May 5, 2020 2:52:00 PM
Attachments: [Letter to D.Santana 02.10.20.pdf](#)
[image003.png](#)

Ms. Ziegler:

Can you please explain how you determined that Mr. Schoeb is a consultant as defined by defined by FPPC Regulation 18700.3? Also please explain how Mr. Guido, who was impliedly identified by Hannah Gordon as being subject to state conflict of interest law (see attached letter), was determined by you not to be a consultant as defined by FPPC Regulation 18700.3. Please provide copies of all records by which you made those determinations.

Thank you,

Brian Doyle | City Attorney
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Santa Clara**
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From: Ruthann Ziegler <rziegler@zieglerlaw.com>
Sent: Tuesday, May 5, 2020 10:06 AM
To: Brian Doyle <BDoyle@SantaClaraCA.gov>
Subject: San Francisco Forth Niners Management Company--Form 700s

Thank you for your March 30 letter. The individuals who are "consultants", as that term is defined by FPPC Regulation 18700.3, on behalf of the Management Company are Brent Schoeb and Jim Mercurio. Mr. Schoeb will file a combined assuming office and annual Statement of Economic Interest and Mr. Mercurio will [file](#) an annual Statement of Economic Interest.

Ruthann G. Ziegler
Attorney at Law

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