

Law Office of

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March 23, 2020

*By email and by U.S. mail*

Nora Pimentel, Stadium Authority Acting Secretary  
Santa Clara Stadium Authority  
1500 Warburton Avenue  
Santa Clara, CA 95050  
[NPimentel@SantaClaraCA.gov](mailto:NPimentel@SantaClaraCA.gov)

RE: Response to February 11, 2020 Notices  
Filing of Form 700

Dear Ms. Pimentel:

This letter is on behalf of the San Francisco Forty Niners Management Company ("Management Company") which is the authorized representative of Al Guido, Brent Schoeb, Jim Mercurio, Patricia Ernstrom, and Ryan Oppelt (collectively, "Affected Parties") in the matter described below. This letter relates to your December 18 and December 24, 2019 notices ("First Notices") and your February 11, 2020 Notices ("Second Notices") to the Affected Parties.

Please be aware that the Management Company and the Affected Parties are reviewing issues relating to the Notices including, but not limited to, the request for determination sent to you today, the validity of seven years of retroactive application of a conflict of interest code, and the validity of retroactive application of a conflict of interest code to a consultant when the code did not include that category. We have also sought guidance from the Fair Political Practices Commission.

The Affected Parties intend to fully comply with applicable portions of the Fair Political Practices Act and FPPC Regulations.

Sincerely,

  
Ruthann G. Ziegler

Cc: Deanna Santana, SCSA Executive Director

Brian Doyle, SCSA General Counsel

Hannah Gordon, CAO and General Counsel

San Francisco Forty Niners Management Company