UNSPORTSMANLIKE CONDUCT:
Santa Clara City Council

2022 Santa Clara County
Civil Grand Jury

Release Date [tentative 10/10/22]

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GLOSSARY AND ABBREVIATIONS

The Brown Act	The Ralph M. Brown Act (Cal. Gov. Code § 549501, et seq.) governs meetings conducted by local legislative bodies, such as boards of supervisors, city councils, and school boards.
City Councilmembers	• Anthony Becker (elected November 2020, term expires 2024) • Raj Chahal (elected November 2018, term expires 2022) • Lisa Gillmor (Mayor) (elected November 2018, term expires 2022) • Karen Hardy (elected November 2018, term expires 2022) • Sudhanshu "Suds" Jain (elected November 2020, term expires 2024) • Kevin Park (elected November 2020, term expires 2024) • Kathy Watanabe (elected November 2020, term expires 2024)
FIFA World Cup	The Federation Internationale de Football Association (FIFA) World Cup, an international soccer competition.
ManCo	Forty Niners Stadium Management Company LLC, an affiliate of the Forty Nners Santa Clara Stadium Company LLC; manages Stadium operations and books non-NFL events.
Measure J	Santa Clara Stadium Taxpayer Protection and Economic Progress Act, passed by the voters of the City of Santa Clara in June 2010. This measure altered the City of Santa Clara charter and created the Santa Clara Stadium Authority.

Political Action Committee	A political committee organized for the purpose of raising and spending money to elect and defeat candidates, ballot initiatives, or measures. Most PACs represent business, labor, or ideological interests.
Performance Rent	The City's portion of the revenue-share arrangement that is derived from non-NFL events held at the Stadium after expenses are accounted for.
Political Reform Act	Political Reform Act: The Political Reform Act of 1974 (Cal. Gov. Code § 81000, et seq.) governs the disclosure of political campaign contributions, spending by candidates, and ballot measure committees. It also sets ethics rules for state and local government officials that impose strict limits on decisions or votes that affect the official's financial interests. The Act also regulates lobbyist's financial disclosure and lobbying practices. The California Fair Political Practices Commission (FPPC) is the state commission responsible for the impartial administration of the Act.
StadCo	Forty Niners Santa Clara Stadium Company LLC, an affiliate of the San Francisco 49ers NFL football team and the tenant of Levi's Stadium.
Stadium Authority	Santa Clara Stadium Authority, the managing entity created by Measure J to construct and own Levi's Stadium while insulating the City of Santa Clara taxpayers from any financial liability deriving from Levi's Stadium construction, maintenance, and operation.

SUMMARY

In 2010, the City of Santa Clara (City) voters approved Measure J to build a stadium on City-owned property and lease it to the San Francisco 49ers Football Company LLC (the 49ers) as tenants. Voters were told that the measure would generate new revenue for the City, create new jobs, provide taxpayer protections, and generate community funding. Measure J authorized the formation of the Santa Clara Stadium Authority (Stadium Authority), which is a separate entity from the City governed by a Stadium Authority Board consisting of the Santa Clara City Council (City Council) and managed by an Executive Director – the City Manager. The City Attorney acts as the Stadium Authority General Counsel. The Stadium Authority is responsible for oversight of stadium operations.

The Stadium Authority entered into an agreement with the Forty Niners Santa Clara Stadium Company LLC (StadCo) for a long-term lease of Levi's Stadium (Stadium). Additionally, the Stadium Authority contracted with the Forty Niners Stadium Management Company LLC (ManCo), an affiliate of StadCo, to manage the Stadium and non-National Football League (NFL) events. The Stadium Authority pays ManCo for services related to Stadium operations. The complexities of these agreements and relationships have been the subject of extensive litigation, a prior Civil Grand Jury report, audit reports, public scrutiny, and numerous media articles.

The 2022 Santa Clara County Civil Grand Jury (Civil Grand Jury) received numerous complaints regarding the governance ethics of some members of the City Council. The complaints allege that five of the seven councilmembers – referred to by the media as the "49er Five" – engage in unethical behavior, lack transparency in their governance, and govern as if the City Council owes a fiduciary duty to the 49ers as opposed to the City, which they were elected to lead.

The Civil Grand Jury's investigation confirms that the actions and inaction of certain councilmembers are not consistent with the duties owed to the constituents they were elected to serve, causing severe dysfunction in City governance. The seven-member City Council is deeply divided. Three councilmembers – Anthony Becker, Suds Jain, and Kevin Park – were elected in 2020 with the campaign backing of Political Action Committees (PACs) affiliated with the 49ers. Two other councilmembers – Karen Hardy and Raj Chahal – have aligned with the three, and these five councilmembers together constitute more than a majority of the City Council. The Civil Grand Jury found through the course of its investigation that these five members can – and do – vote in a manner that is favorable to the 49ers. The Civil Grand Jury will refer to these councilmembers in this report as the City Council Voting Bloc.

The Civil Grand Jury learned that this City Council Voting Bloc frequently meets with registered 49ers lobbyists close in time to City Council meetings but does not reveal the substance of those meetings to the remainder of the City Council or the public, except to frequently repeat the

lobbyists' talking points. There is a serious question about whether their practice is in violation of state laws governing open meetings.

The City Council Voting Bloc is not holding ManCo accountable for its financial accounting deficiencies or its inability to hold non-NFL events that create revenue for the City. Neither does it require ManCo representatives or 49ers representatives to attend City Council meetings to explain matters related to the Stadium and its management.

The City and Stadium Authority have recently settled litigation brought by the 49ers. Two members of the City Council Voting Bloc who are up for re-election, and one who is challenging the current Mayor, received almost $750,000 in donations from 49ers PACs within days after the settlement was reached.

The Civil Grand Jury learned that some members of the City Council Voting Bloc have failed to follow City protocol regarding "operational tours" of the Stadium. The Fair Political Practices Commission (FPPC) has opened a case into whether two councilmembers violated state law regulating gift limitations related to these operational tours. This conduct potentially violated City policy as well. Not surprisingly, there is no City-level inquiry into these actions because that would require a vote by the City Council, which is ruled by the City Council Voting Bloc whose conduct is at issue.

The former City Attorney and former City Manager raised many of these financial, safety, and ethical concerns to the City Council publicly at City Council meetings. Registered lobbyists with the 49ers informed members of the City Council Voting Bloc that they wanted the City Attorney and City Manager fired. The City Council Voting Bloc obliged, and both the City Manager and City Attorney were fired – leaving City management rudderless and without strong leadership.

Although the City has ethics rules designed to promote good governance, City Council ethics guidelines are routinely disregarded and are not enforced. The Civil Grand Jury has serious concerns that the current City Council Voting Bloc, which essentially dictates City action due to the majority they hold, is not acting in the best interests of the City or acknowledging the ethical duties owed to their constituents.

BACKGROUND

The City of Santa Clara

In its 170 years, the City has evolved from a farming community into a successful Silicon Valley city with a convention center, a university, its own utility and water company, and a wealth of high-tech companies, including three in the Fortune 500 as of the year of this report. It is a Charter City with a Council/Manager form of government, consisting of an appointed City Manager and City Attorney, an elected at-large Mayor, and six elected City councilmembers who represent six districts.

Measure J and Management of the Stadium

In 2010, voters approved Measure J to build a stadium on City-owned property and lease it to the 49ers as tenants. The purpose of the measure was to generate new revenue for the City, create new jobs, provide taxpayer protections, and generate community funding.

Measure J authorized the formation of the Stadium Authority as a joint-powers authority to oversee the design and construction of the Stadium, be its landlord, and oversee all business related to Stadium maintenance and operation. This entity was created to insulate the City from any financial burdens related to Stadium operations.

Per Measure J, the Stadium Authority entered into an agreement with StadCo to lease the Stadium for an initial term of 40 years with the option of four five-year extensions. In 2014, the Stadium was completed and the 49ers became the City's tenant.

Following the passage of Measure J, the Stadium Authority contracted with 49ers affiliate ManCo to manage Stadium operations. This contract has an initial term of 25 years with a 15-year renewal option.

This report discusses StadCo, ManCo, and Stadium Authority relationships throughout. For the sake of clarity, here is a very brief summary of those entities. A more complete diagram of the relationships is shown in **Appendix A**.

49ers entities:

- StadCo – the tenant of Levi's Stadium
- ManCo – the manager of Levi's Stadium and scheduler of non-NFL events

City of Santa Clara entities:

- Stadium Authority – entity of the City to keep Stadium finances separate from the City finances and oversee ManCo

The 2015-2016 Civil Grand Jury Report

During its 2015-2016 term, the Santa Clara County Civil Grand Jury, in response to a complaint regarding possible nonconformance to the requirements of Measure J, reported on insufficient oversight by the Stadium Authority and found that no compliance audit had been performed to assure City taxpayers that all transactions were in compliance with Measure J. During the 2015-2016 Grand Jury investigation, the Stadium Authority board approved a Measure J compliance audit.

The 2017 Compliance Audit

In August of 2017, Harvey M. Rose Associates, LLC completed a "Comprehensive Audit of Stadium Authority Finances" to evaluate compliance with Measure J. According to the report, the audit proceeded with an "audit limitation," as follows:

> Audit Limitation: One of the objectives of this audit, review of non-NFL event revenues and expenses, could not be conducted as originally anticipated. Further, a number of other revenue and expense items could not be reviewed and reported on because the Forty Niners Stadium Management Company (ManCo), the company under contract with the Stadium Authority and the Stadium Management Company to manage the Stadium would not allow the audit team to review and report on their records for non-NFL events or parking revenue without signing a non-disclosure agreement that would have prohibited presentation of information from those records in a public document such as this audit report. We did not sign such an agreement and, after that request was made, we did not review or analyze any records maintained by ManCo or include their contents in this report.

The 137-page report details numerous findings and 37 recommendations to improve billing, invoicing, financial transparency, and other such processes so that the City could plan and expect income from these activities.

The Civil Grand Jury received current information on the 37 recommendations. In all, there are 15 instances where compliance has never been achieved or has deteriorated rather than improved. The most egregious items are:

- Existing plans, reports, and budget documents have not been provided by ManCo as required.

- A one-year budget and five-year projection of shared Stadium expenses were required to be supplied on an annual basis to the Stadium Authority. ManCo has not provided these budgets with necessary details.
- Financial information is required on an ongoing basis to assess non-NFL event financial performance, including incentive payments to ManCo. This was partially completed as of 2017 and has since slipped into non-compliance.
- Reports and documentation to verify accuracy of the revenue calculated by ManCo to back up NFL tickets sold each fiscal year have not been provided.

A detailed list of audit recommendations with the 2017 status and current status is shown in **Appendix B**.

2020 City Council Election

In 2020, the 49ers created PACs that spent $2.9 million in support of four candidates for the City Council. Three of those candidates – Anthony Becker, Suds Jain, and Kevin Park – won seats on the City Council.

Two existing councilmembers, Karen Hardy and Raj Chahal, joined the three new councilmembers in creating a five-member majority City Council Voting Bloc that has been referred to in the media as the "49er Five" for their decisions favoring the 49ers.

Registered 49ers Lobbyists and Political Action Committees

California has adopted laws regarding lobbying activities; they are commonly known as the Political Reform Act. (See Cal. Gov. Code § 81000, et seq.) Like a growing number of jurisdictions, the City has also adopted its own lobbying laws.

According to its website, the City "has won many accolades for its programs fostering 'government at its best,' which promote transparency and openness of government." In 2016, the City adopted Ordinance No. 1949, "Regulation of Lobbying Activities." Ordinance No. 1949(i) defines lobbying as "influencing or attempting to influence a legislative or administrative action of the City." Under Ordinance No. 1949, a lobbyist is required to register with the City, renew annually, and pay an annual registration fee. Lobbyists are also required to report to the City semi-annually on their lobbying activity.

Ordinance No. 1949 also makes it unlawful for any lobbyist to deliver or cause to be delivered any gift to any City official, and for any City official to accept any gift from a lobbyist.

A list of current registered 49ers lobbyists appears on the City website.

PACs are also considered to be lobbyists. Figure 1 lists PACs created by the 49ers on behalf of City Council Voting Bloc members Karen Hardy and Raj Chahal (running for reelection) and Anthony Becker (challenger to Mayor Lisa Gillmor) in the November 2022 General Election.

Committees
Names of Committees that matched your search criteria.

- Concerned Citizens Opposing Christian Pellecchia for City Council District 3 2022, sponsored by DeBartolo Corp. & Affiliated Entities, including 49ers Football Co. LLC
- Concerned Citizens Opposing Larry McColloch for City Council District 2 2022, sponsored by DeBartolo Corp. & Affiliated Entities, including 49ers Football Co. LLC
- Frustrated Santa Clarans Opposing Gillmor for Mayor 2022, sponsored by DeBartolo Corp. & Affiliated Entities, including 49ers Football Company, LLC
- John Edwards (Jed) York and Affiliated Entities, including the San Francisco 49ers
- Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022, sponsored by and major funding from DeBartolo Corp. & Affiliated entities, including 49ers Football Co., LLC
- Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 sponsored by and major funding from DeBartolo Corp. & Affiliated Entities, including 49ers Football Co., LLC

Figure 1. Excerpt from the City of Santa Clara Public Portal for Campaign Finance Disclosure and Lobbyist Filings

The website is clickable and searchable. For instance, clicking on "Santa Clara Neighbors Supporting Raj Chahal…" shows an $81,309.04 contribution on September 20, 2022, from a 49ers PAC. At the time of the writing of this report, 49ers PACs have contributed $1.7 million to support members of the City Council Voting Bloc in the upcoming election.

City Councilmembers' Standards for Governance

The Markkula Center for Applied Ethics at Santa Clara University employs government ethics experts who specialize in ethical dilemmas and analysis. The City worked closely with the Markkula Center for Applied Ethics in the past when it formulated its own Code of Ethics and Values. The Markkula Center for Applied Ethics detailed the nature of these ethical duties in an article entitled "*Public Officials as Fiduciaries*." In describing the public official's fiduciary relationship to the public, the article states:

> The public delegates governing authority to public officials to exercise discretion over the public treasury and to create laws that will impact their lives. The public official, once elected, appointed, or hired, is in a superior position to that of the individual citizen due to specialized governmental knowledge and the ability to advise, deliberate, and participate in the representative process. And finally, the public trusts that the public official will act in the public's best interest.

The article describes the public officials' duties as care, loyalty, impartiality, accountability, and preserving the public's trust in government. The article details those duties as follows:

> **The Duty of Care**: The duty of care requires that the public official competently and faithfully execute the duties of the office. Under duty of care fall such obligations as the duty to manage assets competently and be good stewards of the public treasury, to use due diligence in the selection and supervision of staff, to follow the rules and to uphold the constitution and laws of the jurisdiction…
>
> **The Duty of Loyalty**: Public fiduciaries have an absolute obligation to put the public's interest before their own direct or indirect personal interests. The public fiduciary breaches this obligation when he or she benefits at the public expense…
>
> **Duty of Impartiality**: Public officials have a duty to represent all of their constituents fairly. This means that the public fiduciary cannot favor those of his or her own party over other constituents, or let the fact that someone voted against him or her impact the ability to act fairly. They must overcome any inherent bias that they possess.
>
> **Duty of Accountability**: Without a duty of accountability, the public's ability to monitor the behavior of public fiduciaries would be severely limited. From the duty of accountability flow the duty of transparency and the concepts of disclosure, open meetings, and accessibility of public records…
>
> **Duty to Maintain Public Trust in Government**: Without public trust, government doesn't work. The public is willing to delegate authority and sacrifice some freedoms in exchange for an orderly and civilized society, but only if it believes that government is acting in the public's best interest…

These principles are the underpinning of a host of federal, state, and local laws that govern the conduct of public officials. For instance, as discussed further below, the Ralph M. Brown Act (Cal. Gov. Code §§ 54950-54963, referred to as the "Brown Act") is intended to provide public access to meetings of California local government agencies. Its purpose is described in the Brown Act: "The people of this State do not yield their sovereignty to the agencies which serve them. The people insist on remaining informed to retain control over the legislative bodies they have created." (Cal. Gov. Code § 54950.) Likewise, the Political Reform Act (Cal. Gov. Code § 81000, et seq.) places limitations on lobbying activities and was passed by California voters in June of 1974 (Proposition 9) to battle the culture of corruption that was thought to be pervasive in government in the pre-Watergate years.

Further, the City has adopted its own ordinances and policies dictating the governance of the City and the conduct of its elected officials. For instance, as described above, the City has passed an ordinance on lobbying activities. Noteworthy to this report are the following additional City legislative or policy enactments.

Code of Ethics and Values

In 2000, the City, after working with the Markkula Center for Applied Ethics, adopted "Santa Clara's Code of Ethics & Values" that was designed to "provide clear, positive statements of ethical behavior reflecting the core values of the community. The Code includes practical strategies for addressing ethical questions and a useful framework for decision-making and handling the day-to-day operations of the municipality." According to the City's website, all elected officials are required to subscribe to the City's Code, which includes among other things being ethical, professional, service-oriented, and communicative.

The City describes itself as a "national leader in incorporating community ethics and values into local government." The City's Ethics & Values Program has received national attention and has been used as a model for other cities. One standard the City has set addresses "Behavioral Standards for Council Members." The document details positive and negative behaviors illustrative of the core value of ethics. Among the positive behaviors that are encouraged of councilmembers:

- Making careful decisions, advancing the best long-term interests of the City, after considering all available facts, City Staff recommendations, and public comment
- Treating the public and City Staff, at all times, the way I treat highly regarded colleagues in businesses or professions

Among the negative behaviors that are discouraged of councilmembers:

- Paying more attention to friends' and supporters' projects
- Giving special treatment to the companies that pay the most in taxes and to my largest campaign donors
- Making "back room" deals and decisions
- Criticizing or embarrassing the City Manager or other City Staff in public

Admonition and Censure Policy

In May of 2018, the City adopted Policy 47, "Admonition and Censure Policy." This policy applies only to the councilmembers. It states that the City Council is to abide by federal, state, and local laws, including the Code of Ethics & Values. It notes that violations of such laws or policy

"tend to injure the good name of the City and undermine the effectiveness of the City Council as a whole."

Under this Policy, admonition and censure are self-policing processes that may be initiated only by the councilmembers themselves. Further, since the process of initiating an admonition or censure requires a vote of the City Council, the policy is likely to be ineffective if the need for admonition or censure applies to anyone on the City Council Voting Bloc.

Policy 47 is included in **Appendix C**.

METHODOLOGY

The Civil Grand Jury conducted more than ten interviews; reviewed City ordinances and policies; studied legal opinions and legal documents; reviewed more than 700 emails; watched videos of City Council meetings; examined councilmembers' public calendars; reviewed portions of the City's charter and ordinance code, the City's Ethics and Values Program, and the Council Policy Manual; reviewed public Stadium Authority financial documents; reviewed multiple media articles; and consulted with legal experts. The Civil Grand Jury used these sources of information to develop facts, findings, and recommendations.

INVESTIGATION

The City Council Voting Bloc's Serial Meetings with 49ers Lobbyists

One of the duties of accountability and transparency that the City Council owes to its constituents is codified in the open government law known as the Brown Act, which guarantees the public's right to attend and participate in meetings of the local legislative bodies. California Government Code section 54950 et seq. governs the way in which local governmental bodies such as boards of supervisors, city councils, and school boards hold both public (open session) and non-public (closed session) meetings. The concept of open meetings serves as the foundation for good governance by protecting transparency in government affairs.

Under the Brown Act, a "meeting" is defined as a congregation of a majority of the members of a legislative body at the same time and place to hear, discuss, or deliberate upon any matter which is under the subject matter jurisdiction of the agency. (Cal. Gov. Code § 54952.2(a).) The times and dates of all meetings must be posted, and an agenda must be prepared and published ahead of time to provide a brief general description of all matters to be discussed or considered at the meeting. (Cal. Gov. Code §§ 54954, 54954.2(a).) Importantly, Section 54952.2(b)(1) prohibits a majority of members of a legislative body outside of a lawful meeting from directly or indirectly using a series of meetings to discuss, deliberate, or act on any item of business within the subject matter jurisdiction of the body. This concept is known as a "serial meeting," which is described by a California Attorney General publication on the Brown Act as follows:

> Typically, a serial meeting is a series of communications, each of which involves less than a quorum of the legislative body, but which taken as a whole involves a majority of the body's members...Once serial communications are found to exist, it must be determined whether the communications were used to develop a concurrence as to action to be taken.

Serial meetings typically occur in one of three ways:

1. Hub and spoke – These meetings occur when one person acts as the center and communicates with members of the legislative body.
2. Daisy chain – These meetings occur when councilmember A calls councilmember B to discuss an item of city business, and then councilmember B calls councilmember C to discuss the same thing. This type of meeting is also particularly likely to occur by e-mail due to the ease of forwarding emails.
3. Meetings in cyberspace – The internet provides numerous opportunities for local officials to post their thoughts and opinions about City issues. At this time, no court has specifically ruled on the intersection of comments posted on the internet and the Brown Act's requirements.

For more detail, relevant portions of the California Attorney General's pamphlet "The Brown Act: Open Meetings for Local Legislative Bodies (2003)" are excerpted in **Appendix D.**

The City Council holds meetings at least twice a month in both public ("open") and non-public ("closed") sessions. When the newly elected councilmembers joined the City Council in January 2021, they began scheduling regular closed-door meetings with registered 49ers lobbyists. Notably, the meeting arrangements often occur in a "hub and spoke" fashion of serial meetings with two groups meeting with the 49ers lobbyists—the same three members in one meeting, the same two in the other, typically held back to back. These meetings occur with the members of City Council Voting Bloc and never include the remaining two members of the City Council. These meetings are primarily scheduled the day before or the day of regular City Council meetings, with many held immediately prior to the City Council meetings.

Figure 2 illustrates the number of meetings with the 49ers that are in close in time to a City Council meeting and the increasing frequency of those meetings since 2020. The data below comes from the councilmembers' calendars shown in **Appendix E**.

	Councilmember Park		Councilmember Jain		Councilmember Becker		Councilmember Chahal		Councilmember Hardy	
Year	Met with the 49ers	Met with the Council	Met with the 49ers	Met with the Council	Met with the 49ers	Met with the Council	Met with the 49ers	Met with the Council	Met with the 49ers	Met with the Council
2022	50	67	24	20	26	26	19	19	17	22
2021	27	37	44	37	37	37	23	37	29	38
2020	0	5	0	5	0	5	8	40	11	42
Total	**77**	**109**	**68**	**62**	**63**	**68**	**50**	**96**	**57**	**102**

Figure 2. Comparison of City Councilmember Schedules

The above meeting pattern and cadence create numerous concerns. First, the meeting arrangement between the City Council Voting Bloc and the 49ers lobbyists – in a serial fashion – raises serious concerns about potential violations of the Brown Act, which prohibits serial meetings where City business is conducted.

Second and relatedly, the close proximity just before the City Council meetings certainly suggests that the content of the meetings concerns the matters before the City Council. And this frequency and proximity of the meetings with lobbyists to City Council meetings does not happen with any other entity in the City. As to why this type of meeting cadence is needed, one of the councilmembers expressed that the need to meet with 49ers lobbyists was because they were the management company, which of course is not true and underscores at least one councilmember's contorted view of the reporting relationships.

Third, the Civil Grand Jury learned from legal experts that this type of meeting pattern between the City Council Voting Bloc and 49ers lobbyists creates a risk that the councilmembers will divulge privileged information. The likelihood of inadvertent disclosure of privileged information is increased based on the frequency of these meetings.

Fourth, the Civil Grand Jury has transparency concerns with these meetings. According to the City's website, "[i]n an effort to foster greater transparency" the City adopted Ordinance No. 1950 in 2016 requiring that councilmembers publish their calendars to the public. According to the ordinance, "The Mayor, City Council Members, City Manager, City Clerk, Chief of Police and City Attorney shall publish their calendars to the City's website on the tenth business day of each month and shall reflect the schedules of the previous month." Ordinance No. 1950(c) provides that "[e]ach non-internal city-related appointment must include the following information: name(s), title(s), and affiliated organization(s) and a general statement of the issues discussed."

The Civil Grand Jury reviewed the public calendars of the councilmembers and observed that while the calendars of the City Council Voting Bloc include a "general statement of the issues discussed" as required by the Ordinance, the councilmembers' descriptions of their meetings with the 49ers lobbyists are still vague and abbreviated, with only one- or two-word descriptors, most commonly "SCSA/49ers." (SCSA stands for Santa Clara Stadium Authority.) Because of the large number and systematic nature of these closed-door meetings with lobbyists, the Civil Grand Jury is concerned about transparency and whether the 49ers lobbyists are dictating City/Stadium Authority policy to the detriment of the residents.

Appendix E shows the calendars of the five members of the City Council Voting Bloc from January to September of 2022. The meetings with 49ers lobbyists are highlighted.

Fifth, according to the Civil Grand Jury's investigation, the content of those meetings is not shared with the minority members of the City Council and Stadium Authority. The Civil Grand Jury found no evidence that the minority councilmembers met with the registered 49ers lobbyists. The meetings between the 49ers lobbyists and the City Council Voting Bloc occur behind closed doors. There are no known notes of the meetings and meeting minutes are not required, so there is no way to know what was discussed. When the Mayor tried to require minutes of these meetings, the City Council Voting Bloc voted against it.

ManCo

Stadium management and event booking for non-NFL events at the Stadium are run by ManCo, a 49ers affiliate. Pursuant to the agreements with ManCo, the Stadium Authority and ManCo share most expenses for non-NFL events 50/50. A complex revenue sharing agreement apportions income from non-NFL events. The Stadium Authority relies on ManCo's accounting of the expenses and revenues to know if the non-NFL event is profitable.

If the non-NFL event is profitable, ManCo owes the City/Stadium Authority Performance Rent. ManCo has paid zero Performance Rent in six years. To know if ManCo is properly accounting for the expenses and revenues, the Stadium Authority needs to be able to review the financials. As discussed above, obtaining financials has proven problematic.

The Civil Grand Jury's investigations revealed several concerns about the City/Stadium Authority's ability to hold ManCo accountable for its responsibilities.

First, many issues surrounding the lack of proper financial accounting have not been resolved. For years, ManCo has not provided sufficient financial documentation (and in the early years no documentation at all), making it difficult to verify whether the funds received from ManCo were accurate in accounting for all the revenue due to the City. As discussed above, the Harvey Rose audit raised several areas of deficiency regarding ManCo, many of which remain unresolved.

In July 2020, the City Manager published an update on the City website informing residents about the lack of revenue generated by non-NFL events. At that time, 75 percent of non-NFL events lost money.

Figure 3 below, from the Santa Clara Stadium Authority, *Adopted Fiscal Year 2021/2022 Operating*, Debt Service and Capital Budget dated March 23, 2021, provides details. For example, during the 2019 Rolling Stones concert, the City made only $872,000. The City was told that revenue was $11.4 million and expenses were $10.5 million. For the Pac-12 Championship, the City lost $2.6 million: revenue was $3.1 million and expenses were $5.7 million. There is no way to verify these numbers because ManCo has not been forthcoming with detailed documentation.

FY2019/20 Ticketed Non-NFL Events
Revenue and Expenditure Summary

In Millions $

Ticketed Event	Revenue	Expense	Net
Monster Jam	$ 1.6	$ 2.0	$ (0.4)
Bay Area Wedding Fair	0.0	0.0	0.0
USWNT vs South Africa	0.3	0.1	0.2
ICC: Chivas vs Benfica	1.2	1.5	(0.3)
Rolling Stones: No Filter Tour	11.4	10.5	0.9
High School Football Series	0.1	0.1	0.0
Pac-12 Championship	3.1	5.7	(2.6)
Redbox Bowl	4.6	5.2	(0.6)
Total Ticketed Non-NFL Net Revenue to date	**$ 22.3**	**$ 25.1**	**$ (2.8)**

*Numbers may vary due to rounding

Figure 3. Revenue and Expenditure Summary for Levi's Stadium

According to a 2021-2022 budget document prepared by the Stadium Authority, a forensic auditor had been retained to conduct an "expanded analysis of non-NFL events' revenues and expenses." That forensic auditor was hired by the former City Manager. According to the document, the forensic audit was expected to be completed by the Fall of 2021. However, the audit was never completed, and the Civil Grand Jury learned that the effort was ceased after the City Manager was terminated.

To fully appreciate the seriousness of the situation and the pessimism of the City about the prospect of non-NFL events resulting in income to the City, the 2022-2023 Stadium Authority budget specifies zero dollars for Performance Rent. See Figure 4 below.

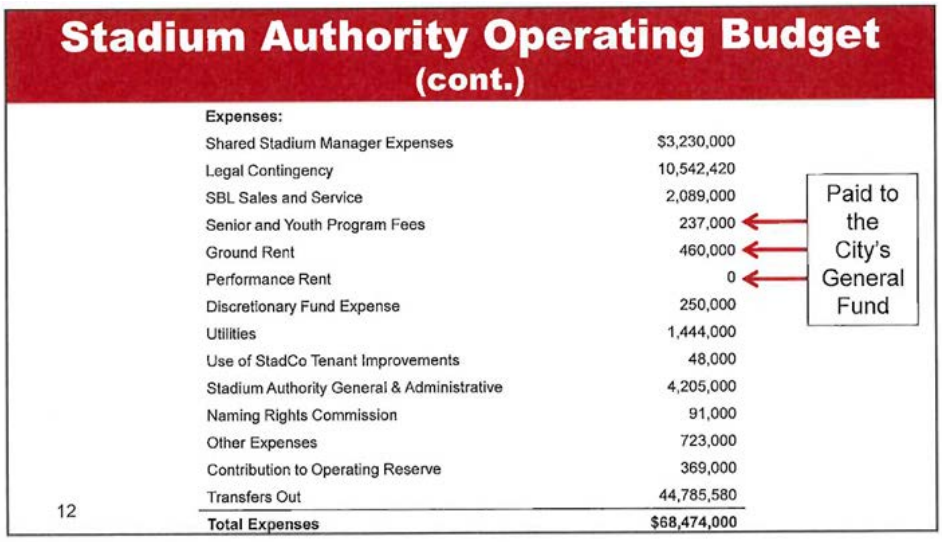


Figure 4. Post-Meeting Material from the March 15, 2022, City Council and Authorities Concurrent Meeting

Second, Measure J promised the voters that the City would financially benefit from the Stadium agreements. For that reality to occur, ManCo needs to book non-NFL events that result in Performance Rent to the City. One of the reasons ManCo has expressed for not being able to successfully book more events has been the 10 p.m. weeknight curfew. The Civil Grand Jury watched a February 2022 presentation made to the City Council by a reputable event management company hired by City staff, which proposed options for increasing revenue streams at the Stadium. According to their envisioned marketing strategies, the curfew need not be a significant impediment for booking talent. One of the ways presented to work around the curfew is to book half-bowl or quarter-bowl events that cater to smaller, more specific demographics.

After the presentation, the City Council Voting Bloc voted not to forward the marketing plan presented that evening to ManCo for consideration. The City Council Voting Bloc members did not address any of the substantive points made by the marketing firm. Instead, one of the City Council Voting Bloc members referred to an email prepared by a 49ers lobbyist disparaging both the marketing firm and the City Manager. It is not clear to the Civil Grand Jury why the City Council Voting Bloc would not want ManCo to consider all strategies for booking non-NFL events. It is actions like these that show that the City Council Voting Bloc puts the 49ers' interests ahead of the City's interests.

Third, City staff have noted chronic fire and life safety violations at the Stadium. A senior Santa Clara Fire Department official detailed ManCo's extensive safety violations to help ManCo achieve compliance. From January 22 to October 23, 2020, for example, ManCo consistently had a monthly average of 21 outstanding violations. Repeated violations included ventilation and explosion control safety measures, lack of compliance with minimum code requirements, expired

permits, alarm deficiencies, damaged doors on freight elevators, failure to maintain fire alarm systems, and portable unventilated heaters.

The Civil Grand Jury reviewed emails showing that the City Manager was criticized by 49ers lobbyists for supporting the actions of the Fire Department official. In August 2021, one of the members of the City Council Voting Bloc questioned why equipment had to be inspected each year. The City Manager responded that equipment inspections were required by state codes, and that neither councilmembers nor staff has discretionary authority to ignore these statutory mandates.

Last, ManCo rarely, if ever, attends City Council meetings where Stadium Authority business relevant to ManCo is being discussed. Commonly, a representative from an organization whose matter is being discussed would be present at the City Council meeting to present, answer questions, or explain a matter. As noted above, the City Council Voting Bloc who meet privately with the 49ers lobbyists have instead become the de facto spokespeople for the 49ers organization, advocating for their positions. This dynamic does not allow the minority councilmembers to ask direct questions of ManCo staff.

The Civil Grand Jury finds that the City Council Voting Bloc has displayed unacceptable behavior by aligning themselves with ManCo and putting the interest of the 49ers ahead of the interest of the citizenry of the City. By aligning itself with ManCo, the City Council Voting Bloc has effectively breached its duties to the City.

Lawsuits

The relationship between the City and the 49ers has been difficult from the outset. Immediately upon taking possession of the Stadium, the 49ers filed to have the possessory interest tax reevaluated. This was an unexpected setback for the City, resulting in $13 million in rebates to the 49ers in 2018.

In August 2018, before the current City Council Voting Bloc was in place, the City/Stadium Authority fought and won a major victory that resolved a $180 million rent dispute with the 49ers. The 49ers' request for a rent reduction over the 40-year lease term was denied and instead, the City/Stadium Authority was awarded a significant rent increase by an arbitrator.

In 2018, the City determined that the 49ers failed to pay $718,000 for the use of a City-owned golf course for Stadium parking. The 49ers responded with a lawsuit claiming that it had overpaid by more than $1 million and offered to settle with a $350,000 payment. The Civil Grand Jury learned that some people with knowledge of the litigation believed that the City had a strong case;

however, that litigation was recently settled when the City Council Voting Bloc accepted the 49ers' offer. The settlement amount did not even cover the City's legal fees.

In 2019, before the current City Council Voting Bloc was in place, the City Council voted to terminate the contract with ManCo, triggering a lawsuit by the 49ers contesting the termination. That lawsuit and others were combined by the court, and the parties were directed to attend mediation. Anxious to wrap this up quickly, the 49ers began an almost daily pressure campaign to sway public opinion and force the City to settle the lawsuits, all of which were initiated by the 49ers. The settlement would enable them to continue managing the Stadium.

A settlement was announced on August 31, 2022, pursuant to which ManCo would continue managing the Stadium and non-NFL events. There are reports of shouting, swearing, offensive hand gestures, and aggression by one of the members of the City Council Voting Bloc during the closed session that occurred the evening prior to the announcement. The police were called, and they remained present for the balance of the Council meeting.

One day after the settlement announcement, contributions of almost $750,000 were made by the "Debartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC" to the PACs that support three members of the City Council Voting Bloc in the upcoming November election. See **Appendix F** for copies of the Late Contribution Report Form 497, which is the public disclosure form for these contributions.

FIFA World Cup

The Federation Internationale de Football Association (FIFA) World Cup is an international soccer competition. In June of 2022, FIFA announced that the Stadium will host matches for the 2026 FIFA World Cup.

The Civil Grand Jury learned that as early as 2021, members of the City Council Voting Bloc met with 49ers lobbyists privately to discuss hosting FIFA matches at the Stadium. Neither the 49ers nor the councilmembers would share with the City Manager or City staff what was being discussed or anticipated. At least one councilmember would not share what they knew because of a belief that confidentiality was owed to the 49ers. This is another blatant example of a councilmember putting the interest of the 49ers ahead of the City.

In February 2022, the City Council passed a resolution welcoming the 2026 FIFA World Cup (Competition) to the City. At that meeting, the then-City Manager raised concerns about how hosting the FIFA World Cup at the Stadium could negatively impact the City/Stadium Authority. The then-City Manager presented a PowerPoint that noted concerns like security costs, as follows:

> Government is requested - at its own cost - to assume full responsibility for safety and security at the [FIFA] Competition and Competition-related events. Security operations are not limited to stadiums, but also other locations used for the Competition, such as training sites, team base camps, hotels, broadcast center, FIFA Fan Fest sites, airports, train and bus stations, and other transportations[sic] hubs, etc.

The PowerPoint noted that the host city is also required to make certain declarations, and the then-City Manager expressed concerns about whether the City would be able to make these declarations. For instance, the then-City Manager noted that the host city might be required to "adopt all measures and enact all necessary laws, ordinances or regulations (including local, regional or national laws, ordinances or regulations)." The then-City Manager further raised concerns about possible conflicts of interest because one of the heads of the host committee is also president of the 49ers.

As discussed below, the City Council Voting Bloc voted to terminate the City Manager two days later.

The City Manager's concerns were warranted. A commitment to host the FIFA World Cup comes with many costs and possible pitfalls.

- Although the FIFA World Cup is expected to be a boon for local tourism, a major percentage of the profits for the World Cup is derived from ticket sales and advertising rights. The host city gets no part of these profits; FIFA takes all the profit as part of the agreement.

- FIFA has strict terms and conditions for host cities. The hosts are expected to have temporary housing to accommodate the players and fans from other countries. It is unknown if the City will be able to accommodate this requirement, what new infrastructure will be required, and how this influx will affect surrounding neighborhoods.

- According to Measure J, the City is responsible for all public safety costs associated with non-NFL events. One estimate for security costs alone to support FIFA events exceeded $15 million. This includes safety and security for hotels, training sites, transportation, broadcast sites, and team facilities.

Two major cities, Chicago and Quebec, declined to bid. One reason cited was that the cost to a host city had more than doubled in the past three years to almost $80 million. Others include the lack of transparency with FIFA's policies, inflexibility, and long list of demands, which includes the requirement that all contracts for the event be written under Swiss law.

The City/Stadium Authority remains in the dark about the FIFA commitments and the potential impact to the City. Even though members of the City Council Voting Bloc met with 49ers' lobbyists on the subject of the FIFA bid, the Civil Grand Jury's investigation could not uncover any further information regarding this subject.

Operational Tours

The objective of the Political Reform Act is the promotion of impartial and ethical conduct of public affairs by state and local government officials. (See Cal. Gov. Code § 81000 et seq.) The California Fair Political Practices Commission (FPPC) has primary responsibility for the administration of the Political Reform Act. (Cal. Gov. Code § 83111.) Elected officials, like the City Council, are required to disclose their financial holdings on the Statement of Economic Interests filing via a form commonly known as the Form 700. (Cal. Gov. Code § 87200, et seq.) One of the central purposes of the disclosure requirements is to ensure that public officials "perform their duties in an impartial manner, free from bias caused by their own financial interests or the financial interests of persons who have supported them." (Cal. Gov. Code § 81001, subd. (b).) The Political Reform Act was enacted because "[a]ssets and income of public officials which may be materially affected by their official actions should be disclosed and in appropriate circumstances the officials should be disqualified from acting in order that conflicts of interest may be avoided." (Cal. Gov. Code § 81002(c).)

The City has its own rules regarding accepting gifts, including a prohibition against gifts from lobbyists. The City Council adopted and promulgated the Council Policy Manual "to provide clear, consistent and detailed direction by which the City Council, Boards, Commissions, Standing and Ad Hoc Committees, shall conduct City Council business and activities." The City Council Policy Manual, Policy 050, "Gifts to Elected and Appointed Officials," contains the following rules about gifts:

> Elected and appointed officials are required to report gifts worth $50 or more on their annual Statement of Economic Interests (Form 700) with the FPPC. If a gift valued at less than $50 is accepted, the elected or appointed official shall promptly disclose such acceptance either at a public meeting of a body on which official serves during the Reports of Members portion of the Agenda or, for elected department heads, in a written Report to Council.
>
> Elected and appointed officials shall not accept gifts from any single source aggregating to $470 or more in a calendar year. If a gift or series of gifts aggregating to $470 or more is accepted from a single source during any 12-month period preceding the officials' involvement in a decision affecting the gift-giver, the elected or appointed official may be required to disqualify him or herself from participating in that decision-making process.
>
> Elected and appointed officials may not accept any gift from a lobbyist.

Councilmembers Karen Hardy and Raj Chahal are being investigated by the FPPC for exceeding the gift limitation from the 49ers. This investigation involves receiving 49ers game tickets. These

councilmembers claim in their defense that they gained entry into the Stadium on a game day to conduct “operational tours” of the Stadium, ostensibly not to watch the game.

The Civil Grand Jury learned that the City had a protocol for scheduling operational tours. Operational tours require significant advance planning and scheduling. Security personnel, paid for by the City, must be available to escort councilmembers throughout the facility. Past operational tours were arranged through the City Manager’s office in coordination with the police department. Badges or access passes for an event were sent to the City Manager’s office and then distributed to councilmembers and staff who signified that they wanted to attend the tour. In addition, the operational tours were publicly noticed as a special meeting, and the public was invited to the outside portion of the tour.

Hardy and Chahal attended the November 15, 2021, 49ers v. Rams game. They received passes to the game from the 49ers. It is unknown what kind of pass they received (e.g., general admission, VIP) because they have refused to publicly provide this information. Further, it is not known what the operational tour involved. For example, did the councilmembers observe the areas of ManCo's fire and safety violations? None of this information is available because they did not arrange it through the City, have not discussed this information publicly, and the typical protocol of arranging, noticing, and coordinating operational tours was not followed. The Assistant Chief of Police for the Santa Clara Police Department was unaware that this was going to happen, and protocol would have dictated that he or his staff be forewarned of a tour.

An additional councilmember on the City Council Voting Bloc told the Civil Grand Jury that he purchased a ticket on the day he was conducting his “operational tour” to avoid the scrutiny his fellow councilmembers were going through with the FPPC. If the City Council Voting Bloc requested operational tours in the manner that tours had been conducted by previous City Councils, there would be no need for councilmembers to “protect” themselves. When asked by members of the electorate to put the topic of their tickets on the City Council agenda as an opportunity to explain themselves, the councilmembers refused.

It is worth noting that operational tours should be available for all councilmembers on the same basis.

Councilmembers’ acceptance of football tickets from the 49ers has raised serious concerns that these members are in violation of the Political Reform Act. Further, there are City laws that regulate this conduct, including the City’s ordinance code that makes it “unlawful…for any City official to accept any gift from a lobbyist.” As of this writing, the City has not opened an investigation into whether Hardy and Chahal violated City law. The FPPC investigation, however, is ongoing.

There is a concern in the community about the temporal aspect of councilmembers attending special 49ers events and voting in favor of the 49ers on important Stadium Authority business. In particular, the day after Hardy and Chahal attended the 49ers game, they voted with the City Council Voting Bloc in favor of extending the weekday Stadium curfew. The curfew was put in place to protect the neighbors on weeknights, but the 49ers have been lobbying to change it. The Civil Grand Jury cannot read the minds of the councilmembers, but their actions give an appearance of impropriety that is diminishing the trust of their constituents, their own City staff, and fellow councilmembers.

Ethics

As described above, the City touts itself as a leader in ethics and professionalism. The City has a policy that addresses "Behavioral Standards for Council Members." The document details positive and negative behaviors illustrative of the core value of ethics.

Meeting Behavior

The Civil Grand Jury watched more than 28 hours of video recordings of at least seven City Council meetings and was shocked to see repeated instances of councilmembers behaving acrimoniously and disrespectfully toward each other, City staff, and the public. This type of behavior is not consistent with the Code of Ethics & Values that is supposed to guide the City Council (e.g., communicative and collaborative decision-making, mutual respect, and trust). And certainly, the Behavior Standards for City Councilmembers, which are supposed to dictate "a basic set of character traits and actions residents can expect to see Council Members meet and exceed" are not being adhered to by the councilmembers.

The Civil Grand Jury learned of a concern that a member of the City Council Voting Bloc has participated with their video camera off during Zoom City Council meetings so as to communicate with 49ers lobbyists for direction. Whether this is legally permissible is beyond the scope of this report; however, for the sake of transparency and accountability, and because of the unique challenges of the relationship with the 49ers, the Civil Grand Jury believes all video cameras should remain on during remote meetings.

There is a City Council Government and Ethics Committee that is supposed to meet regularly. According to the Legislative Meeting Calendar on the City's website, it appears that they have not met this year. There are also ethics guidelines and an Admonition and Censure Policy on the City's website, but there is no effective enforcement mechanism of the City's ethics guidelines other than self-policing—singling out an individual for bad behavior and voting for their dismissal. This type of enforcement mechanism fails for members of a majority voting bloc because a majority vote of the City Council is required to initiate an action.

Treatment of City Staff

Another behavioral standard the City Council has adopted is "[t]reating the public and City Staff, at all times, the way I treat highly regarded colleagues in businesses or professions." And a behavior to be avoided is "criticizing or embarrassing the City Manager or City Staff in public." Throughout its investigation the Civil Grand Jury uncovered evidence of disrespect toward staff by members of the City Council Voting Bloc.

Members of the City Council Voting Bloc doubted the accuracy of City staff's work and favored the 49ers' interpretation on a variety of subjects. The Civil Grand Jury saw no evidence that this doubt was warranted. As mentioned previously, the Civil Grand Jury viewed documents showing members of the City Council Voting Bloc advocating on behalf of the 49ers and arguing with staff about state safety codes and established norms. On many occasions, these arguments led to City staff expending an inordinate amount of time defending their already well-reasoned analysis. During City Council meetings, members of the City Council Voting Bloc repeatedly challenged the staff's efforts and recommendations regarding increasing revenues of the Stadium. Most disturbing was the instance described above where during a City Council meeting a member of the City Council Voting Bloc used an email sent by a 49ers lobbyist as his reason for not accepting City staff recommendations. Overall, the Civil Grand Jury saw a hostile environment for City staff, illustrated by a text conversation between two members of the City Council Voting Bloc remarking that a member of the City staff was not afraid of them.

Section 807 of the City Charter makes it clear that "except for the purpose of inquiry, the City Council and its members shall deal with the administrative service under the City Manager solely through the City Manager and neither the City Council nor any member shall give orders to any subordinates of the City Manager, either publicly or privately." A violation is a misdemeanor. Under the City Code, the City Manager is tasked as the chief administrative officer with responsibility for the administration of all affairs of the City. (Santa Clara City Code §§ 2.15.020(a) & (c).) The Civil Grand Jury learned that the then-City Manager made a complaint that, among other things, a councilmember was directing City staff. An outside investigator was hired to investigate the complaint. If true, the allegations in that complaint may have violated the Charter. On August 23, 2022, the City noticed a closed session meeting under the exception for "public employment appointment" for the City Manager. At that meeting, the City Council Voting Bloc voted to stop the investigation made from that complaint.

City Attorney and City Manager

The influence of the 49ers on the City's governance is undeniable: regular meetings with councilmembers, PAC funding of campaigns supporting 49ers-favorable candidates, and feeding

councilmembers talking points are all counter to the City's interest. This dynamic presented insurmountable challenges for the former City Attorney and former City Manager.

The job of the City Attorney, who also holds the position of General Counsel for the Stadium Authority, includes defending both entities in the numerous lawsuits the 49ers have initiated over the years. (Santa Clara City Code § 2.25.020.) Before the City Council Voting Bloc existed, the City was successful in defending litigation brought by the 49ers. The Civil Grand Jury learned that the City/Stadium Authority had reason to believe that it could prevail in defense of litigation filed by the 49ers. At a City Council meeting in April 2021, two of the City Council Voting Bloc admitted that 49ers lobbyists had expressed that they "would like to see [the City Attorney] gone" and that they had "concerns about the City Attorney." In September 2021, the City Council fired the City Attorney. The vote was 5-2, with the City Council Voting Bloc voting in favor of termination.

As detailed above, the former City Manager defended her staff against inappropriate behavior from the City Council Voting Bloc. She opened investigations. She raised concerns about ManCo's compliance with contractual agreements. She has had to defend herself from personal attacks by 49ers lobbyists, who told the City Council Voting Bloc that they wanted the City Manager/Stadium Authority Executive Director gone. On February 22, 2022, she spoke out about concerns related to the FIFA event, urging caution and the need for more information. She also raised the issue of potential conflicts of interest related to the 49ers. Two days later, the City Council fired the City Manager with a contractually obligated severance package. The vote was 5-2, with the City Council Voting Bloc voting in favor of termination.

The Civil Grand Jury commends the former City Attorney and former City Manager for putting the interests of the City and Stadium Authority first, which has come at great personal and professional cost.

CONCLUSION

The promise of Measure J was exciting for City residents. However, the reality has proven more complex than expected and has unveiled the lack of protections the City has in place to insulate itself from Stadium management issues and 49ers influence.

Open meetings are the core of good governance. The Civil Grand Jury has noted the frequency and proximity of closed-door meetings between the City Council Voting Bloc and 49ers lobbyists, which are suggestive of serial meetings prohibited by the Brown Act. Further, the relationship with ManCo is proving problematic in that the City/Stadium Authority is not holding ManCo to its obligations.

Recently, the City/Stadium Authority settled legal action brought by the 49ers. The details have yet to become public, but it is very concerning to the Civil Grand Jury that several councilmembers received large campaign donations from 49ers-backed PACs within days after the decision to settle. This, compounded with the fact that the City has been without a permanent City Attorney for over a year, raises great concern.

The former City Manager attempted to bring to light the lack of transparency surrounding the management of the Stadium and its finances. Additionally, the former City Manager raised questions regarding potential risks to the City posed by upcoming FIFA events. The City Manager was subsequently fired. Those concerns remain unresolved, and it seems unlikely that they will be addressed under the current culture.

In general, with the existing City Council Voting Bloc, the City Council operates in a manner inconsistent with the ethical ideals it touts on the City website. The Civil Grand Jury finds that the City needs to rethink its current structure for maintaining high ethical standards and work with experts in this field who can help the City insulate itself from its current ethical dilemmas.

FINDINGS AND RECOMMENDATIONS

This report points to serious concerns about the City Council Voting Bloc. The Civil Grand Jury recognizes that the "City"– which currently has a governing board that consists of this majority – will be required to vote to determine if it agrees with these findings and whether it will accept the recommendations. (Cal. Pen. Code § 933.05.) It is the Civil Grand Jury's charge to investigate government operations, and this report seeks to do that despite the obvious limitation posed by the City Council Voting Bloc.

Finding 1a

The City Council Voting Bloc meets regularly, and as often as weekly, with lobbyists for the 49ers. While these councilmembers report the date, some of the attendees, and a topic of the meeting, there is no requirement to disclose the substance of those discussions, and the councilmembers do not disclose the content of these meetings.

Finding 1b

The meetings are typically held serially, with three councilmembers in one meeting and two in the next.

Finding 1c

The frequency of meetings of the City Council Voting Bloc with the 49ers lobbyists has created concern about the City Council's governance and leaves the impression that the City Council Voting Bloc is meeting in a manner to subvert the Brown Act's open meeting requirements. This has led to distrust amongst councilmembers as well as between the councilmembers and their constituents.

Recommendation 1a

Prior to voting on any 49ers-related matters and to prevent violations of the Brown Act, the City councilmembers should publicly disclose on the record if they have met with a 49ers lobbyist regarding a topic on the meeting agenda, the name of the lobbyist(s), the date of the meeting, all individuals present, and any information provided by the lobbyist(s). This recommendation should be implemented by February 1, 2023.

Recommendation 1b

The City should expand its existing calendar ordinance, City of Santa Clara Ordinance No. 1950, to require minutes of all meetings, including the attendees, agenda, duration, and a detailed summary of matters discussed, to be posted online with the calendar. This recommendation should be implemented by February 1, 2023.

Recommendation 1c

To restore public trust, the City should require that meetings with 49ers lobbyists be recorded so the public can be assured that these closed-door, frequent, and proximal meetings to the City Council meetings do not violate the Brown Act. This recommendation should be implemented by February 1, 2023.

Recommendation 1d
The City should establish an open governance commission to evaluate the City's current open government practices and make recommendations for improvement. This recommendation should be implemented by February 1, 2023.

Finding 2
There is concern that the City Council Voting Bloc is getting real-time influence from 49ers lobbyists during City Council meetings.

Recommendation 2
The City should require councilmembers to be visible at all meetings either in person or on camera.

Finding 3a
ManCo has not provided sufficient financial accounting to the City/Stadium Authority as required.

Finding 3b
The City has identified several fire and safety violations that ManCo has not remediated.

Finding 3c
The agreement with ManCo is designed to result in Performance Rents payable to the Stadium Authority for non-NFL events; however, expenses from those events result in no income payable to the Stadium Authority.

Finding 3d
Despite ManCo's lack of financial transparency, failure to schedule non-NFL events in a fashion that yields a financial benefit to the City/Stadium Authority, and repeated unabated fire and safety violations, the City recently agreed to keep ManCo as the operator of the Stadium.

Recommendation 3a
The City/Stadium Authority should hire a certified public accounting firm to conduct a comprehensive audit of Stadium Authority finances and the financial documents submitted by ManCo, to begin no later than February 1, 2023 and annually thereafter.

Recommendation 3b
The City/Stadium Authority should advocate for a third-party referee to oversee all of ManCo's management activities. This third party should report on a quarterly basis at City Council meetings the status of fire and safety remediation efforts, to begin no later than February 1, 2023.

Recommendation 3c
The City/Stadium Authority should allocate staff to oversee Stadium operations. This should include finances, management policy development, and regular website updates of the City's financial reporting documents. This will facilitate a better awareness of ManCo's day-to-day operations. This recommendation should be implemented by February 1, 2023.

Finding 4
FIFA and the 49ers have announced that 2026 FIFA World Cup matches will be held at the Stadium. The former City Manager raised concerns about the lack of information and potential risks the event could pose to the City/Stadium Authority.

Recommendation 4a
The City/Stadium Authority should request that the 49ers provide a report on the status of the commitments made to the FIFA event. This recommendation should be implemented by February 1, 2023.

Recommendation 4b
The City/Stadium Authority should evaluate if the FIFA event poses risks to the City/Stadium Authority, including specifically the risks outlined by the former City Manager regarding security costs and the nature of declarations required of the host city.

Recommendation 4c
The City and Stadium Authority should take no further action regarding FIFA until the information in 4a and 4b is made public.

Finding 5
The City/Stadium Authority has a protocol for initiating and completing operational tours of Levi's Stadium. Several councilmembers have not used this protocol and have conducted operational tours on game days, which has raised concerns about whether these councilmembers have accepted gifts in violation of the Political Reform Act and City policy. These actions have also created the appearance of a lack of transparency, which has fostered distrust between City councilmembers, toward the City staff, and most importantly, with the residents of the City.

Recommendation 5a
The City/Stadium Authority should adopt a policy and outline procedures for elected and appointed officials to conduct operational tours of the Stadium. This document should be published on the City's website to properly inform the public. This recommendation should be implemented by February 1, 2023.

Recommendation 5b
The consequence for not adhering to the proper protocols for operational tours should result in an evaluation whether the City of Santa Clara Council Policy Manual, Admonition and Censure Policy should be invoked.

Recommendation 5c
The City should hire an independent consultant to evaluate and publicly report on whether councilmembers have violated City Policy No. 050, "Gifts to Appointed and Elected Officials." This recommendation should be implemented by February 1, 2023.

Finding 6

The relationships between the City, Stadium Authority, StadCo, and ManCo are creating ethical dilemmas and governance challenges. The governing body for the City now consists of the City Council Voting Bloc, which (1) has received significant campaign contributions from 49ers lobbyists, (2) meets regularly with 49ers lobbyists behind closed doors, and (3) has engaged in actions that suggest loyalty to the 49ers above the City.

Recommendation 6a

The City should hire a qualified legal and ethical consultant to evaluate the challenges presented by the unique relationship between the City and 49ers and prepare a public report on the findings and recommendations. This recommendation should be implemented by February 1, 2023.

Recommendation 6b

The consultant should be tasked with looking at the unique challenges presented by the likely chance that the 49ers lobbyists will continue to influence elected officials and City governance. The consultant should specifically be tasked with evaluating the benefits of mechanisms like an oversight body or commission, auditors, and changes to the ordinance code and other governing documents that better ensure accountability and transparency in the relationship with the 49ers.

Finding 7

Although the City consulted with Markkula Center for Applied Ethics and boasts of having model ethics rules, those rules were developed before the complexities created by the passage of Measure J. The City's current policies, like the Admonition and Censure Policy, do not work where the challenges are presented by a minority of the City Council membership.

Recommendation 7a

The City should add to the City Code of Ethics & Values and the Admonition and Censure Policy a procedure to enable the public to file a complaint and testify at a public hearing to help remediate ethics violations. This should include a procedure for public admonishment, revocation of special privileges, or censure. This recommendation should be implemented by February 1, 2023.

Recommendation 7b

The City should establish an independent Public Ethics Commission, with guidance from the Markkula Center for Applied Ethics, to help ensure that all public officials conduct government decision-making processes in an ethical, transparent and unbiased manner without favor. This recommendation should be implemented by February 1, 2023.

Recommendation 7c

The City should require councilmembers to attend additional training in good governance provided by a third party such as the Markkula Center for Applied Ethics no later than February 1, 2023, and once a year thereafter. The training should include the Brown Act with emphasis on issues such as serial meetings, closed sessions, the fiduciary duty of government officials, filing Form 700s, and other issues related to good governance.

Finding 8a

The City Manager and City Attorney positions are important executive-level leadership positions within the City. The City Attorney and the City Manager raised concerns about the 49ers and councilmembers activities related to the 49ers. Both were fired shortly thereafter.

Finding 8b

Members of City staff, including the former City Attorney and former City Manager, have shown commendable loyalty and dedication to the City and its interests.

Recommendation 8

No recommendation.

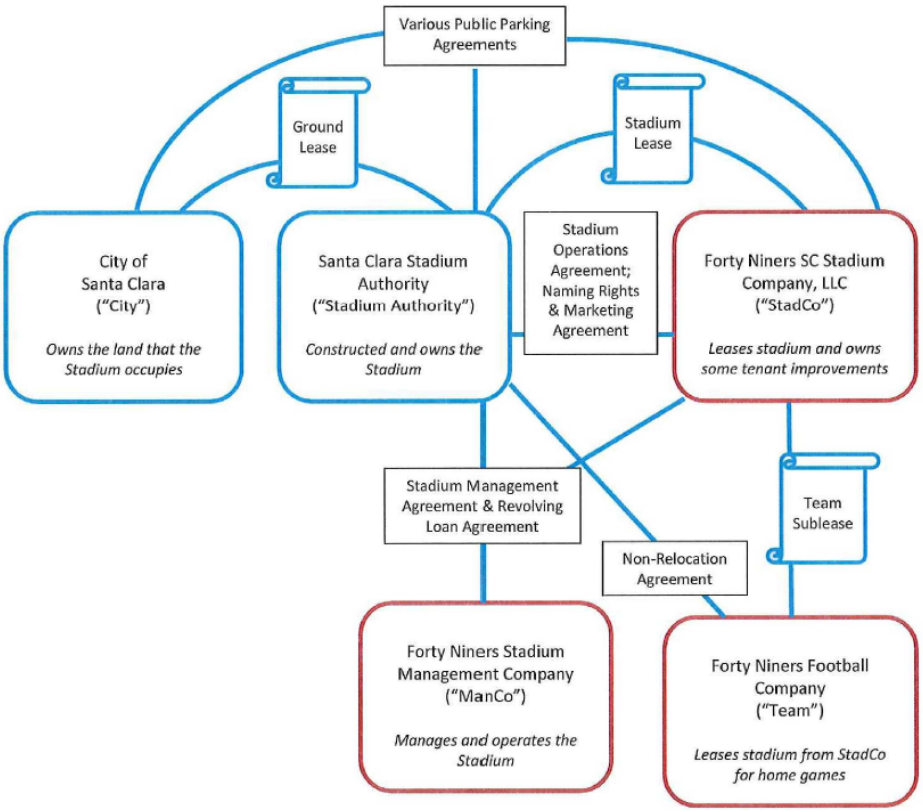
REQUIRED RESPONSES

Pursuant to California Penal Code § 933(b) et seq. and California Penal Code § 933.05, the County of Santa Clara 2022 Civil Grand Jury requests responses from the following governing body:

Responding Agency	Findings	Recommendations
The City of Santa Clara	1a, 1b, 1c, 2, 3a, 3b, 3c, 3d, 4, 5, 6, 7	1a, 1b, 1c, 1d, 2, 3a, 3b, 3c, 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 7a, 7b, 7c

APPENDIX A: CITY AND 49ERS RELATIONSHIPS

Exhibit 1.1: Overview of Stadium-Related Leases and Agreements



Comprehensive Audit of Stadium Authority Finances, prepared by Harvey M. Rose Associates, LLC, August 2017.

APPENDIX B: HARVEY ROSE AUDIT RECOMMENDATIONS

NOTE: Status as of 12/12/17 came from a City analysis. Current status is based on information the Grand Jury learned during the course to its investigation.

	Compliance with Harvey Rose Audit Recommendations	Status as of 12/12/17	Current Status
1.A	The Stadium Authority Board should direct the Executive Director to request the public safety costs threshold be adjusted through negotiations with StadCo to reflect actual costs to the City for providing public safety services for NFL events.	Partially Complete	Out of Compliance
1.B	The Stadium Authority Board should direct the Executive Director and Stadium Authority counsel to notify Manco that the absence of five year capital expenditure plans for FYs 2014-15 and 2015-16 was a breach of Section 10.3 of the Stadium Lease and that Manco is required to provide such plans under the lease for the current and all future Stadium Authority fiscal years.	Complete	Complete
1.C	The Stadium Authority Board should direct the Executive Director to provide a copy of the Operation and Maintenance Plan to the Stadium Authority Board for review, in closed session if deemed necessary for public safety reasons by the Stadium Authority counsel.	Complete	Complete
1.D	The Stadium Authority Board should require that Stadium Authority staff and Manco prepare an annual public safety budget in conjunction with the City's public safety departments detailing both NFL and non-NFL event public safety costs for submission to and adoption by the Board.	Partially Complete	Partially Complete
1.E	The Stadium Authority Board should direct the Executive Director to renegotiate provisions of the Stadium Lease so that the Stadium Authority receives a share of any concessionaire revenue that exceeds the minimum guaranteed amount from non-NFL events.	Complete	Out of Compliance
1.F	The Stadium Authority Board should direct the Executive Director to notify StadCo that a formal consolidated draft parking plan must be produced and delivered to the Community Development Department and to the Board for review and approval as required under the Stadium Lease.	Not Implemented	Not Implemented
1.G	The Stadium Authority Board should direct the Chief of Police to present the public safety plan to the Stadium Authority Board for review and formal approval (in closed session if deemed necessary by Stadium Authority counsel) and to present any updates to the public safety plan to the Stadium updates to the public safety plan to the Stadium Authority Board for review and documented adoption.	Partially Complete	Out of Compliance
1.H	The Stadium Authority Board should direct the Executive Director to formally notify StadCo that the total cost for stadium insurance must be disclosed in the shared stadium expenses budget pursuant to Section 4.6 of the Management Agreement and, based on the disclosure, consider proposing to StadCo an amendment to the Stadium Lease to remove the provision that the Stadium Authority pay a fixed amount of insurance costs, with StadCo paying an	Partially Complete	Complete

1.I	The Stadium Authority Board should direct the Executive Director to formally notify StadCo and Manco that Manco is in breach of the Management Agreement because it did not furnish Annual Statements of Stadium Operations for FYs 2014-'15 and 2015-16, and to require that such statements be provided for those years, for FY 2016-17 and each year thereafter.	Not Implemented	Not Implemented
1.J	The Stadium Authority Board should direct the Executive Director to send formal notification to Manco and StadCo that Manco was in apparent breach of the Stadium Lease requirement that a one year budget and five year projection of shared Stadium expenses be provided on an annual basis to the Stadium Authority and demanding that Manco provide such budgets and projections for the current and all future years. The Executive Director should be directed to provide a written response to Manco each year on the draft budget submitted by Manco.	Complete	Out of Compliance
1.K	The Stadium Authority Board should direct the Executive and Treasurer to work with Manco to require that the annual operating budget and quarterly financial status reports disclose sufficient information to ensure that staff and the Board can determine whether the Stadium Authority is adhering to Stadium Lease requirements contained in Article-14 regarding the allocation of excess Stadium Authority revenue.	Not Implemented	Not Implemented
1.L	The Stadium Authority Board should direct the Executive Director to notify Manco that previous annual marketing plans were inadequate as they did not set forth reasonably detailed plans to develop, implement, and monitor marketing, booking, advertising, and promotion of non-NFL activities. The Board should further direct the Executive Director to notify Manco that future marketing plans must include such details and be reviewed for sufficient detail by the Executive Director before being presented to the Board.	Partially Complete	Complete
1.M	The Stadium Authority Board should direct the Executive Director to confer with the Finance Director to confer to determine what financial information would be necessary to assess non-NFL event financial performance, including incentive payments to Manco, and then notify Manco regarding what additional information will be required on an ongoing basis.	Partially Complete	Out of Compliance
1.N	The Stadium Authority Board should direct the Executive Director to notify Manco that it is in breach of Management Agreement Section 3.3, which requires that written revenue or other reports relating to non-NFL events be provided to the Stadium Authority within 45 days of each non-NFL event with attendance projected to exceed $25,000. The Stadium Authority Board should further direct the Executive Director to demand that Manco provide such written revenue reports according to specifications to be detailed by the Treasurer for all future non-NFL events with attendance projected to exceed $25,000.	Partially Complete	Out of Compliance

1.O	The Stadium Authority Board should direct the Executive Director and Stadium Authority counsel to request an amendment to the Management Agreement that would require formal and/or informal bidding procedures for any transactions with Manco affiliates or for transactions above a designated threshold to ensure that goods and services received from an affiliate of Manco are competitively priced.	Not Implemented	Partially Complete
1.P	The Stadium Authority Board should direct the Executive Director to direct Manco to provide quarterly written reports to the Stadium Authority, to be maintained as permanent Stadium Authority records, detailing parking lot information as required in the first amendment to the management agreement.	Partially Complete	Out of Compliance
1.Q	The Stadium Authority Board should direct the Executive Director to require that all meetings, including the date and purpose of the meetings, between Stadium Authority staff and Manco be documented and reported quarterly or annually to the stadium authority board.	Complete	Complete
1.R	The Stadium Authority Board should direct the Executive Director to establish procedures to ensure that all existing plans, reports, and budget documents required to be provided by Manco are provided to the Stadium Authority in the manner required by existing agreements. The Stadium Authority Board should further direct the Executive Director to report annually on the status (receipt, review, and approval status) of each required plan, report, and budget document	Partially Complete	Out of Compliance
2.A	The Stadium Authority Board should request that Manco provide the relevant reports and documentation that back up the NFL ticket surcharge summary report in order to retain permanent verification of the accuracy of the surcharge calculated by Manco.	Partially Complete	Out of Compliance
2.B	The Stadium Authority Board should negotiate with Manco to establish a level of detail regarding non-NFL event revenue and expenses that can be provided in City reports, public documents, and permanent records to be kept by the Stadium Authority without compromising ManCo's ability to book and negotiate deals with non-NFL event acts and performances. The Board should direct staff to include this level of detail for both budgeted and actual revenues and expenses in the annual proposed budget and the quarterly financial status reports to allow the Board and public to monitor the performance of non-NFL events and ManCo's performance in	Not Implemented	Not Implemented
2.C	2.C The Stadium Authority Board should require that a detailed breakdown of performance rent calculations and payments to the City of Santa Clara be included in the budget and quarterly financial status reports using additional information provided by Manco.	Complete	Partially Complete
2.D	The Stadium Authority Board should require that Manco provide reports and documentation that can be kept in Stadium Authority records, consistent with confidentiality provisions in the agreements that back up the non-NFL ticket surcharge summary report in order to verify that the surcharge calculated by Manco is accurate.	Partially Complete	Out of Compliance

2.E	The Stadium Authority Board should require that a comprehensive accounting of Debt Service Fund transactions, including beginning and year-end balances, budget vs. actual revenues and expenditures by specific line item, and details on all transfers in and out of the fund, be presented in Stadium Authority budgets and financial status reports.	Complete	Complete
2.F	The Stadium Authority Board should require that Discretionary Fund revenues, expenses, budget-to-actual comparisons, and account balances be reported in Stadium Authority budgetary documents separately from the Operating Fund.	Complete	Complete
2.G	The Stadium Authority Board should require that Manco prepare the five year Shared Expense Budget, per the requirements in the Stadium Management Agreement, and the Board should direct the Executive Director to document receipt of the Shared Expense Budget, and provide written comments to Manco in response to the proposed expenses.	Complete	Complete
2.H	The Stadium Authority Board, StadCo, and ManCo should amend the Management Agreement or separately establish binding policies that do not allow retroactive increases in authorized expenditures such as Stadium Manager expenses, and should require that detailed explanations be provided to the Board when additional funding is requested midyear in advance of such expenses being incurred.	Not Implemented	Not Implemented
2.I	The Stadium Authority should require that Manco provide independently prepared reports and documentation to back up the number of NFL tickets sold for each fiscal year in order to verify that the senior/youth fee calculated by Manco is accurate and to have a set of permanent records documenting the validity of this revenue.	Not Implemented	Not Implemented
2.J	The Stadium Authority Board and the City of Santa Clara should clarify when the City Purchasing Authority procurement thresholds (Santa Clara Municipal Code Chapter 2.105.070 et seq.) apply and when the Stadium Authority Procurement Policy thresholds (Santa Clara Municipal Code Chapter 17.30) apply.	Complete	Complete
2.K	The Stadium Authority Board should direct staff to prepare policies and procedures pertaining to all purchases made on behalf of the Stadium Authority to require a level of specificity in costs and services in all vendor contracts, that all invoices bill using the rates or unit costs specified in their contracts, and that the invoices and contracts be periodically reviewed by Stadium Authority staff.	Not Implemented	Unknown
2.L	The Stadium Authority Board should require that budgets and actual expenditures for the Stadium construction budget be presented alongside the Stadium Authority Operating Budget to provide an accurate overall picture of purchases for all materials, services, and supplies for the Stadium.	Complete	Complete
2.M	The Stadium Authority Board should direct staff to report revenues and expenditures on an accrual basis in budgetary documents so that all amounts presented reflect actual results for the year, regardless of the timing of revenue receipt or expenses incurred.	Not Implemented	Not Implemented

3.A	The Stadium Authority Board should request that staff prepare plans for reimbursement to the City's General Fund for unreimbursed staff costs from the appropriate source: Discretionary Fund, Manco, or, to the extent funds are available and appropriate, the Construction Fund.	Not Implemented	Not Implemented
3.B	The Stadium Authority Board should request that staff have Manco prepare an annual comprehensive Public Safety budget, as required by the Stadium Lease, to include all components of Stadium public safety costs and reimbursement, including NFL public safety costs paid for directly by Manco on behalf of StadCo, by the Stadium Authority from the Discretionary Fund, and any costs paid using other funds such as the Construction Fund.	Partially Complete	Complete
3.C	The Stadium Authority Board should direct staff to develop specific definitions of which costs should be charged as overhead and which should be direct billed. Alternatively, staff should adjust the rate applied to direct billed staff costs from the current 10 percent to a more appropriate rate, and communicate to all staff which positions or activities will be charged as overhead.	Not Implemented	Not Implemented
4.A	The Stadium Authority should exercise its right stipulated in the agreement between master parking lot operator Citypark and Manco to periodically audit the detailed records of individual parking lots for NFL and non-NFL events.	Partially Complete	Unknown
4.B	The Stadium Authority Board should direct staff to report back on the advantages and disadvantages of adding City audit rights as a condition of granting parking permits.	Not Implemented	Not Implemented
4.C	The Stadium Authority Board should direct staff to require that Manco provide a written report on matters related to off-site parking operations at their quarterly meetings, requiring that baseline information be provided in a specific format.	Not Implemented	Not Implemented

APPENDIX C: ADMONITION AND CENSURE POLICY

City of Santa Clara Council Policy Manual

ADMONITION AND CENSURE POLICY

PURPOSE

This policy applies only to the Mayor and City Council members for improper conduct that may result in admonition or censure.

POLICY

It is the policy of the City Council that all of its members shall abide by federal and state law, City ordinances, and City policies, including the Code of Ethics and Values.

Violations of such law or policy tends to injure the good name of the City and to undermine the effectiveness of the City Council as a whole.

Depending on the circumstances of alleged violations of law or policy, the Council may initiate an investigation of the allegations prior to the filing of a request for any of the actions described in this policy.

Nothing in this policy shall preclude individual Council Members from making public statements regarding such alleged conduct.

At any point during any of the processes described in this policy, the Council may refer the matter, as appropriate, to the Santa Clara County District Attorney for investigation. Following such a referral, the Council may proceed with any actions it chooses to undertake under the provisions of this policy. While the Council has broad discretion in deciding actions it may choose to take in response to violations of law or policy, this policy provides definitions and procedures related to two types of action: admonition and censure.

Admonition

An admonition may typically be directed to all members of the City Council, reminding them that a particular type of behavior is in violation of law or City policy, and that, if it occurs or is found to have occurred, could make a member subject to censure. An admonition may be issued in response to a particular alleged action or actions, although it would not necessarily have to be triggered by such allegations. An admonition may be issued by the City Council prior to any findings of fact regarding allegations, and because it is a warning or reminder, would not necessarily require an investigation or separate hearings to determine whether the allegation is true. An admonition may also be treated as taking action to criticize a council member's conduct. The right to criticize is protected by the First Amendment, and may be done individually, or as a whole by motion.

Censure

Censure is an official reprimand or condemnation made by City Council in response to specified conduct by one of its own members. Censure is disciplinary in nature, and requires the formal adoption of a resolution setting forth the council member's alleged violations of law and/or policies. Censure may require an investigation, and must protect the due process rights of the council member. Censure carries no fine or suspension of the rights of the council member as an elected official but a censure is a punitive action that serves as a punishment for wrongdoing.

PROCEDURE

Informal Admonition

An individual Council Member can make an admonition at any Council meeting during the Public Presentations or Reports of Members and Special Committees portion of the meeting.

Censure

The Council may request a formal censure action be placed on a Council agenda. The City Clerk shall provide notice of the possible censure to the Councilmember who is the subject of the action. The notice shall contain the specific charges on which the proposed censure is based and the date and time that the matter will be heard. Upon hearing the testimony, the Council may take action by resolution setting forth its findings and stating the terms of the censure.

City Council-approved policy dated 5/15/2018

Reference:

APPENDIX D: THE BROWN ACT

(Excerpted from “The Brown Act - Open Meetings for Legislative Bodies”)

Serial Meetings

The issue of serial meetings stands at the vortex of two significant public policies: first, the constitutional right of citizens to address grievances and communicate with their elected representatives; and second, the Act’s policy favoring public deliberation by multi-member boards, commissions and councils. The purpose of the serial meeting prohibition is not to prevent citizens from communicating with their elected representatives, but rather to prevent public bodies from circumventing the requirement for open and public deliberation of issues.

The Act expressly prohibits serial meetings that are conducted through direct communications, personal intermediaries or technological devices for the purpose of developing a concurrence as to action to be taken. (§ 54952.2(b); Stockton Newspapers, Inc. v. Redevelopment Agency (1985) 171 Cal.App.3d 95, 103.) This provision raises two questions: first, what is a serial meeting for purposes of this definition; and second, what does it mean to develop a concurrence as to action to be taken.

Typically, a serial meeting is a series of communications, each of which involves less than a quorum of the legislative body, but which taken as a whole involves a majority of the body’s members. For example, a chain of communications involving contact from member A to member B who then communicates with member C would constitute a serial meeting in the case of a five-person body. Similarly, when a person acts as the hub of a wheel (member A) and communicates individually with the various spokes (members B and C), a serial meeting has occurred. In addition, a serial meeting occurs when intermediaries for board members have a meeting to discuss issues. For example, when a representative of member A meets with representatives of members B and C to discuss an agenda item, the members have conducted a serial meeting through their representatives as intermediaries. The statutory definition also applies to situations in which technological devices are used to connect people at the same time who are in different locations (but see the discussion below concerning the exception for teleconference meetings).

Once serial communications are found to exist, it must be determined whether the communications were used to develop a concurrence as to action to be taken. If the serial communications were not used to develop a concurrence as to action to be taken, the serial communications do not constitute a meeting and the Act is not applicable. In construing these terms, one should be mindful of the ultimate purposes of the Act -- to provide the public with an opportunity to monitor and participate in the decision-making processes of boards and commissions. As such, substantive conversations among members concerning an agenda item prior to a public meeting probably would be viewed as contributing to the development of a concurrence as to the ultimate action to be taken. Conversations which advance or clarify a member’s understanding of an issue, or facilitate an agreement or compromise among members,

or advance the ultimate resolution of an issue, are all examples of communications which contribute to the development of a concurrence as to action to be taken by the legislative body. Accordingly, with respect to items that have been placed on an agenda or that are likely to be placed upon an agenda, members of legislative bodies should avoid serial communications of a substantive nature concerning such items.

Problems arise when systematic communications begin to occur which involve members of the board acquiring substantive information for an upcoming meeting or engaging in debate, discussion, lobbying or any other aspect of the deliberative process either among themselves or with staff. For example, executive officers may wish to brief their members on policy decisions and background events concerning proposed agenda items. This office believes that a court could determine that such communications violate the Act, because such discussions are part of the deliberative process. If these communications are permitted to occur in private, a large part of the process by which members reach their decisions may have occurred outside the public eye. Under these circumstances, the public would be able only to witness a shorthand version of the deliberative process, and its ability to monitor and contribute to the decision-making process would be curtailed. Therefore, we recommend that when the executive director is faced with this situation, he or she prepare a memorandum outlining the issues for all of the members of the board as well as the public. In this way, the serial meeting violation may be avoided and everyone will have the benefit of reacting to the same information.
However, this office does not think that the prohibition against serial meetings would prevent an executive officer from planning upcoming meetings by discussing times, dates, and placement of matters on the agenda. It also appears that an executive officer may receive spontaneous input from any of the board members with respect to these or other matters so long as a quorum is not involved.

The express language of the statute concerning serial meetings largely codifies case law developed by the courts and the opinions issued by this office in the past. In Frazer v. Dixon Unified School District (1993) 18 Cal.App.4th 781, 796-798, the court concluded that the Act applies equally to the deliberations of a body and its decision to take action. If a collective commitment were a necessary component of every meeting, the body could conduct most or all of its deliberation behind closed doors so long as the body did not actually reach agreement prior to consideration in public session. Accordingly, the court concluded that the collective acquisition of information constituted a meeting. The court cited briefing sessions as examples of deliberative meetings which are subject to the Act’s requirements, and contrasted these sessions with activities that fall outside the purview of the Act, such as the passive receipt of an individual’s mail or the solitary review of a memorandum by an individual board member.

In Stockton Newspapers, Inc. v. Redevelopment Agency (1985) 171 Cal.App.3d 95, 105, the court concluded that a series of individual telephone calls between the agency attorney and the members of the body constituted a meeting. In that case, the attorney individually polled the members of the body for their approval on a real estate transaction. The court concluded that even though the meeting was conducted in a serial fashion, it nevertheless was a meeting for the purposes of the Act. (See also, 65 Ops.Cal.Atty.Gen. 63, 66 (1982); 63 Ops.Cal.Atty.Gen. 820, 828-829 (1980).)

APPENDIX E: COUNCILMEMBERS' CALENDARS

Park Calendar

Date	Time	Subject	Attendees
7/4/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; ; Josh Stephens; Diana Torres
7/5/2022	5:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
7/11/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
7/12/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
7/18/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
6/6/2022	4:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
6/6/2022	5:30 PM	Special Meeting of the Council	Public Meeting
6/7/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/13/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
6/20/2022	3:30 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
6/20/2022	5:00 PM	Special Meeting City Council	Public Meeting
6/21/2022	4:30 PM	Council and Authorities Concurrent Meeting and Special Meeting Santa Clara Stadium Authority	Public Meeting
6/27/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
5/2/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
5/9/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
5/10/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
5/16/2022	4:45 PM	Special Meeting City Council	Public Meeting
5/17/2022	5:00 PM	Special Meeting City Council	Public Meeting
5/23/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
5/24/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
5/31/2022	4:30 PM	Special Meeting City Council	Public Meeting
4/4/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
4/5/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/11/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
4/18/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Suhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
4/19/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/25/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
4/28/2022	12:30 PM	Special Council Meeting	Public Meeting
3/1/2022	5:00 PM	Special Council Meeting	Public Meeting
3/7/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
3/8/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
3/9/2022	4:00 PM	Special Council Meeting	Public Meeting
3/14/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
3/15/2022	1:30 PM	Special Council Meeting and Stadium Authority Meeting	Public Meeting
3/21/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
3/23/2022	7:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
3/29/2022	6:00 PM	Special City Council	Public Meeting
2/1/2022	4:00 PM	Special City Council Meeting	Public Meeting
2/7/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
2/14/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
2/22/2022	4:00 PM	Joint Meeting of the Council and Authorities Concurrent and Stadium Authority	Public Meeting
2/24/2022	5:00 PM	Special City Council Meeting	Public Meeting
2/28/2022	5:00 PM	BCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
1/10/2022	5:00 PM	BCGA // 49ers	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Sudhanshu Jain;Anthony Becker;Josh Stephens;Diana Torres
1/11/2022	5:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
1/24/2022	5:00 PM	BCGA // 49ers	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Sudhanshu Jain;Anthony Becker;Josh Stephens;Diana Torres
1/25/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
1/31/2022	5:00 PM	BCGA // 49ers	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Sudhanshu Jain;Anthony Becker;Josh Stephens;Diana Torres

Becker Calendar

Date	Time	Subject	Attendees
7/5/2022	5:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
7/12/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/6/2022	4:00 PM	SCSA // 49ers. Topics: Coldplay and Concert economics	Emily Matthews; Rahul Chandhok; Larry MacNeil; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
6/6/2022	5:30 PM	Special Meeting Council and Authorities Concurrent Meeting	Public Meeting
6/7/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/13/2022	5:00 PM	SCSA // 49ers. Topics: SBL's; SCSA economics and field replacement; Field Seats; Community Day and FIFA update	Emily Matthews; Rahul Chandhok; Larry MacNeil; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
6/15/2022	1:30 PM	Community Day at Levi's Stadium	Councilmember Karen Hardy, Emily Matthews; Josh Stephens, Diana Torres; Rahul Chandhok, other volunteers
6/16/2022	1:30 PM	FIFA 2026 Bid Announcment at Levi's Stadium	Councilmember Karen Hardy, Councilmember Raj Chahal, Assemblymember Evan Low, Assemblymember Marc Berman, Councilmember Kevin Park, Patricia Emstrom, Jim Mercurio, Diana Torres, Josh Stephens, Rahul Chandok, Mayor Sam Liccardo
6/20/2022	5:00 PM	Special Meeting City Council	Public Meeting
6/20/2022	4:30 PM	Council and Authorities Concurrent Meeting and Special Meeting Santa Clara Stadium Authority	Public Meeting
6/27/2022	5:00 PM	SCSA // 49ers. Topics: Naming Rights Minimum number of Major Events; SCSA overhead costs; Field Seats; Concerts; Naming Rights Agreement; SCSA overhead; Senior and Youth program Fee; Group Firme public safety; Ticket prices and ticket price breakdown	Rahul Chandhok; Larry MacNeil; Kevin Park; Sudhanshu Jain
5/2/2022	5:00 PM	SCSA // 49ers. Topics: SBL Field Seats; Coldplay Press Conference Invite; explanation of NNE	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
5/9/2022	5:00 PM	SCSA // 49ers. Topics: SBL Field Seats; Coldplay Press Conference; STR Renewal; NRA Signage; Potential Soccer Match	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Anthony Becker; Josh Stephens; Diana Torres
5/10/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
5/13/2022	2:15 PM	Levi's Stadium Press Conference for Cold Play Concert	Local Various News Media; Karen Hardy; Emily Matthews; Jas Sajjan; Rahul Chandhok; Josh Stephens; Diana Torres
5/13/2022	6:00 PM	Celebrity Bartender Event Part/ Program @ Santa Clara Porche	Diana Torres; Jazmyn Tonumaipea; Winston Ashby; Various other invited guests
5/15/2022	6:45 PM	Levi's Stadium Concert Operations Tour	Emily Matthews; Jas Sajjan; Rahul Chandhok; Josh Stephens; Diana Torres
5/15/2022	9:00 PM	Cold Play Concert	Ticketed Event
5/16/2022	4:45 PM	Special Meeting City Council	Public Meeting
5/17/2022	5:00 PM	Special Meeting City Council	Public Meeting
5/23/2022	5:00 PM	SCSA // 49ers. Topics: Coldplay Recap; Noise monitors; SBL's for Field Seats; FIFA update; PSC follow up; New CFO.	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; ; Josh Stephens; Diana Torres; Suds Jain; Kevin Park
5/24/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
5/31/2022	4:30 PM	Special Meeting City Council	Public Meeting
4/11/2022	5:00 PM	SCSA // 49ers; Topics: Budget; NRG signage repair; Field Seats SBL's; Concert update; SBL contract execution; PRA's	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
4/18/2022	5:00 PM	SCSA // 49ers; Topics: Field Seats; PPPC rules on tours; FIFA	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
4/19/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/28/2022	12:30 PM	Special Council Meeting	Public Meeting
3/1/2022	5:00 PM	Special Council Meeting	Public
3/7/2022	5:00 PM	SCSA // 49ers. Topics: SCSA Annual Budget; Budget Preview; Noise Monitoring; Landmark Security Contract renewal; SBL Contracts stalled	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park ;Sudhanshu Jain; Josh Stephens; Diana Torres
3/822	4:00 PM	Council and Authorities Concurrent Meeting	Public
3/9/2022	4:00 PM	Special Council Meeting	Public
3/14/2022	5:00 PM	SCSA // 49ers. Topics: Topics: SCSA budget overview; Annual Budget Summary; Revenue & Operating Expense Breakout;Debt and Reserves; Unnecessary interest and advances; Stadium Manager proposal;	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
3/15/2022	1:30 PM	Special Council and Stadium Authority Meeting	Public
3/21/2022	5:00 PM	SCSA // 49ers. Topics: Field Seats SBL; SCSA Budget; Landmark Extension;Flyovers - Noise Monitoring ;FIFA Swag Costs; Crees Trail Updates	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
3/22/2022	7:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public
3/29/2022	5:00 PM	Special Council Meeting	Public
2/1/2022	4:00 PM	Special City Council Meeting	Public
2/14/2022	5:00 PM	SCSA // 49ers Topics: Cyber security incident Santa Claras cost of services	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
2/22/2022	4:00 PM	Joint Meeting of the Council and Authorities Concurrent and Stadium Authority	Public
2/24/2022	5:00 PM	Special City Council Meeting	Public
2/28/2022	5:00 PM	SCSA // 49ers- Topics: Concert Update, Recent Media concerns, Concert Update After Russia Invasion, NNE Marketing Plan	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Sudhanshu Jain; Josh Stephens; Diana Torres
1/2/2022	11:30 AM	Stadium Football Operations Tour/Texans-49ers Game	Councilmember Suds Jain, Rahul Chandhok, Vice President (VP) of Public Affairs and Strategic Communications, Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, Larry MacNeil, Compliance Manager; Emily Matthews, Manager of Communications and Public Affairs, Moon Javaid, Chief Strategy Officer, and Jim Mercurio
1/10/2022	5:00 PM	SCSA // 49ers, Topics- City Staff not understanding stadium contract; concert update , staff delays, Santana ethical concerns	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Kevin Park;Sudhanshu Jain;Josh Stephens;Diana Torres
1/11/2022	5:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
1/24/2022	5:00 PM	SCSA // 49ers. Topics: Meet Josh Stephens; Santana CEO title concerns; Related EIR- 62,000 more truck trips; recent news stories on Santa Clara; Bike path detour	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Kevin Park;Sudhanshu Jain;Josh Stephens;
1/25/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
1/31/2022	5:00 PM	SCSA // 49ers: Topics Meet Diana Torres Manager of External Engagement; Santana Email snooping concerns; Tours by council members; TV ratings; Curfew and Cold Play Concert	Emily Matthews;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Kevin Park;Sudhanshu Jain;Josh Stephens;Diana Torres

Jain Calendar

Date	Time	Subject	Attendees
7/18/2022	5:00 PM	Robert Haugh, Field Seats, Training Camp Permit, Fireworks	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers
7/12/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
7/11/2022	5:00 PM	Pun Audit of 2019 College Football Playoff, Public Safety Costs, Naming Rights, Levis signs, James Rowen	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers
7/5/2022	5:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
6/27/2022	5:00 PM	SBL and ticket prices, Naming Rights, Senior/Youth Fees, Legal fees, Noise Monitoring, Public safety for Groupo Firme	Emily Matthews; Rahul Chandhok; Larry MacNeil; Diana Torres
6/21/2022	4:30 PM	Council and Authorities Concurrent Meeting and Special Meeting Santa Clara Stadium Authority	Public Meeting
6/20/2022	3:30 PM	Field Seats/SBLs, Stadium Noise, James Rowen	Rahul Chandhok
6/20/2022	5:00 PM	Special Meeting City Council	Public Meeting
6/7/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/6/2022	4:00 PM	Coldplay ticket fees and revenues, Public Safety Costs, Stadium NURC, James Rowen	Emily Matthews, Registered Lobbyist, Manager of Communications and Public Affairs, San Francisco 49ers, Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers
6/6/2022	5:30 PM	Special Meeting of City Council -- Commission Appointments	Public Meeting
5/31/2022	4:30 PM	Special Meeting City Council	Public Meeting
5/30/2022	5:00 PM	SCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Anthony Becker; Josh Stephens; Diana Torres
5/24/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
5/23/2022	5:00 PM	SCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Anthony Becker; Josh Stephens; Diana Torres
5/17/2022	5:00 PM	Special Meeting City Council	Public Meeting
5/16/2022	4:45 PM	Special Meeting City Council	Public Meeting
5/10/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
5/9/2022	5:00 PM	SCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Anthony Becker; Josh Stephens; Diana Torres
5/2/2022	5:00 PM	SCGA // 49ers	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Kevin Park; Anthony Becker; Josh Stephens; Diana Torres
4/28/2022	12:30 PM	Special Council Meeting	Public Meeting
4/25/2022	5:00 PM	SBLs for field seats, FIFA	Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers;Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers
4/19/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/18/2022	5:00 PM	SBLs for field seats, FIFA, FPPC rules on tours	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Registered Lobbyist, Manager of Communications and Public Affairs, San Francisco 49ers,Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres,Manageror External Engagement, SF 49ers
4/12/2022	5:00 PM	Kenn Lee reviewing financials, James Rowen, Levi's Sign, Field SBLs, 2022 concert schedule, SBL sales processing, Public Safety Costs, Elton John	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Registered Lobbyist, Manager of Communications and Public Affairs, San Francisco 49ers,Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers
4/11/2022	5:00 PM	Kenn Lee reviewing financials, James Rowen, Levi's Sign, Field SBLs, 2022 concert schedule, SBL sales processing, Public Safety Costs, Elton John	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Registered Lobbyist, Manager of Communications and Public Affairs, San Francisco 49ers,Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers
3/29/2022	5:00 PM	Special Council Meeting	Public Meeting
3/22/2022	7:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
3/21/2022	5:00 PM	Creek Trail, James Rowen, Field Seats, SCGA Budget, Landmark Security Extension, FIFA Swag, Financial System	Rahul Chandok, registered lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers; Molly Riddle, Bicycle Planner, Fehr and Peers; Steve Davis, Transporation Engineer, Fehr and Peers
3/15/2022	1:30 PM	Special Council/SCGA Meeting	Public Meeting
3/14/2022	6:00 PM	Budget Overview, Josh Rooney	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers,Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers; Alex Acton, Finance, SF
3/9/2022	4:00 PM	Special Closed Session Council Meeting	Public Meeting
3/8/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
3/7/2022	5:00 PM	FY2022/23 budget, Noise Monitoring, Landmark Security, SBL Contracts	Rahul Chandok, Registered Lobbyist, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Registered Lobbyist, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Registered Lobbyist, Manager of Communications and Public Affairs, San Francisco 49ers,Larry MacNeil, Registered Lobbyist, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers, Alex Acton: Manager of Finance and registered lobbyist.
3/1/2022	5:00 PM	Special Council Meeting	Public Meeting
2/15/2022	2:30 PM	Phone call with Rahul: Topics: James Rowen, Parking detailment, Future stadium	Rahul Chandhok

Jain Calendar Continued

2/14/2022	5:00 PM	Cyber Security, City Budget, FIFA	Rahul Chandok, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers
2/10/2022	5:30 PM	Topics: Neighborhood Stadium Relations Committee, Climate Change, politics	Rahul Chandok, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Larry MacNeil, Compliance Manager, San Francisco 49ers;
2/7/2022	5:00 PM	Golf Course Litigation, Cold Play, May 15 concert, 2022 redistricting and election dates, FIFA	Rahul Chandok, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers; Josh Stephens, Manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers
2/1/2022	4:00 PM	Special City Council Meeting	Public Meeting
1/31/2022	5:00 PM	Deanna's Luxury Home, Levi's Stadium Tours, Cold Play concert, 49ers TV ratings, Parades	Rahul Chandok, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers;, Josh Stephens - manager of Communications and Public Affairs, SF 49ers; Diana Torres, Manager of External Engagement, SF 49ers
1/25/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
1/24/2022	4:30 PM	Golf Course, Deanna's salary, Related fill dirt, Creek Trail	[redacted] San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers;, Josh Stephens, Manager of Communications and Public Affairs, SF [redacted]
1/11/2022	1:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
1/10/2022	5:00 PM	SCGA // 49ers Topics: SCSA Expenses, YGP Parking, Concerts, Behested Payments law	Rahul Chandok, Vice President (VP) of Public Affairs and Strategic Communications, San Francisco 49ers; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications, San Francisco 49ers; Emily Matthews, Manager of Communications and Public Affairs, San Francisco 49ers;Larry MacNeil, Compliance Manager, San Francisco 49ers
1/2/2022	5:00 PM	49er Football Game Operations Tour	Rahul Chandhok, Vice President (VP) of Public Affairs and Strategic Communications; Jas Sajjan, Senior Manager of Public Affairs & Strategic Communications; Larry MacNeil, Compliance Manager; Emily Matthews, Manager of Communications and Public Affairs, Moon Javaid, Chief Strategy Officer; and Jim Mercurio among others

Chahal Calendar

Date	Time	Subject	Attendees
7/5/2022	5:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
7/12/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/6/2022	5:30 PM	Special Meeting of the Council	Public Meeting
6/8/2022	3:30 PM	Concert update and misc stadium operations	Emily Matthews; Karen Hardy; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
6/20/2022	5:00 PM	Special Meeting City Council	Public Meeting
6/21/2022	4:30 PM	Council and Authorities Concurrent Meeting and Special Meeting Santa Clara Stadium Authority	Public Meeting
6/22/2022	3:30 PM	Stadium events update and other misc. Stadium operational items	Emily Matthews; Karen Hardy; Josh Stephens; Diana Torres
5/16/2022	4:45 PM	Special Meeting City Council	Public Meeting
5/17/2022	5:00 PM	Special Meeting City Council	Public Meeting
5/31/2022	4:30 PM	Special Meeting City Council	Public Meeting
4/6/2022	3:30 PM	SCGA // 49ers	Emily Matthews; Karen Hardy; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
4/19/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/20/2022	3:30 PM	SCGA // 49ers	Emily Matthews; Karen Hardy; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
4/28/2022	12:30 PM	Special Council Meeting	Public Meeting
3/1/2022	5:00 PM	Special Council Meeting	Public Meeting
3/2/2022	3:30 PM	SCGA // 49ers	Emily Matthews; Karen Hardy; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
3/8/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
3/9/2022	4:00 PM	Special Council Meeting	Public Meeting
3/14/2022	4:00 PM	SCSA // 49ers. Budget and misc stadium operations	Emily Matthews; Sajjan, Jas; Chandhok, Rahul; Josh Stephens; Diana Torres; Acton, Alex; MacNeil, Larry; Karen Hardy
3/15/2022	1:30 PM	Special Council/SCSA Meeting	Public Meeting
3/22/2022	7:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
3/23/2022	3:30 PM	SCGA // 49ers. Creek Trail, Budget, Concert and other misc. operations issues	Emily Matthews; Karen Hardy; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
3/29/2022	5:00 PM	Special Council Meeting	Public Meeting
2/1/2022	4:00 PM	Special City Council Meeting	Public Meeting
2/9/2022	3:30 PM	Concert update and misc. stadium operations items	Emily Matthews; Karen Hardy; Raj Chahal; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
2/16/2022	3:30 PM	Cyber incident update, Concert update and misc. stadium operations items	Emily Matthews; Karen Hardy; Raj Chahal; Sajjan, Jas; Chandhok, Rahul; MacNeil, Larry; Josh Stephens; Diana Torres
2/22/2022	4:00 PM	Joint Meeting of the Council and Authorities Concurrent and Stadium Authority	Public Meeting
2/24/2022	5:00 PM	Special City Council Meeting	Public Meeting
1/19/2022	3:30 PM	Concert update, Parking and other misc. Stadium operational items	Emily Matthews;Karen Hardy;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Josh Stephens;Diana Torres
1/26/2022	3:30 PM	Bike trail, Stadium Tour history and other misc. Stadium operational items	Emily Matthews;Karen Hardy;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Josh Stephens;Diana Torres

Hardy Calendar

Date	Time	Subject	Attendees
7/5/2022	5:30 PM	Council and Authorities Concurrent Meeting	Public Meeting
7/12/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/22/2022	3:30 PM	FIFA announcement, Cold Play Concert debrief, & Announcement of international soccer game at stadium soon	Emily Matthews, Raj Chahal, Diane Torres & Josh Stephens
6/21/2022	4:30 PM	Council and Authorities Concurrent Meeting and Special Meeting Santa Clara Stadium Authority	Public Meeting
6/20/2022	5:00 PM	Special Meeting City Council	Public Meeting
6/16/2022	1:30 PM	Announcement of FIFA city choices for 2026	Many elected, press, stadium employees and others
6/15/2022	1:30 PM	Community Day - assembled cleaning kits to be distributed by the Santa Clara School Foundation	Anthony Becker and many other stadium employees
6/8/2022	3:30 PM	SCSA // 49ers	Emily Matthews;Karen Hardy;Raj Chahal;Sajjan, Jas;Chandhok, Rahul;MacNeil, Larry;Josh Stephens;Diana Torres
6/7/2022	4:00 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
6/6/2022	5:30 PM	Special Meeting Council and Authorities Concurrent Meeting	Public Meeting
5/25/2022	3:30 PM	SCSA // 49ers	Emily Matthews; Raj Chahal; Sajjan, Jas; Chandhok, Rahul;MacNeil, Larry;Josh Stephens; Diana Torres
5/17/2022	5:00 PM	Special Meeting City Council	Public Meeting
5/16/2022	4:45 PM	Special Meeting City Council	Public Meeting
5/13/2022	2:15 AM	Press Conference for Cold Play Concert	Many members of the press, Anthony Becker, Rahul Chahal, Emily Matthews, Josh Stephens, Jas Sajjan
5/10/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
5/4/2022	11:15 AM	Promotion for Coldplay Concert	Josh Stephens
4/28/2022	12:30 PM	Special Council Meeting	Public Meeting
4/20/2022	3:30 PM	Delay in repairs, concerts	Sajjan, Jas; MacNeil, Larry; Josh Stephens - 49ers
4/19/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
4/6/2022	3:30 PM	Concerts	Raj Chahal; Rahul Chandhok, 49ers
4/5/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
3/29/2022	5:00 PM	Special Council Meeting	Public Meeting
3/22/2022	7:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
3/15/2022	1:30 PM	Special Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
3/14/2022	4:00 PM	Stadium budget and signage	Rahul Chandhok, Jas Sajjan, Diana Torres, Josh Stephens, Larry McNeil, Alex Acton & Raj Chahal
3/9/2022	4:00 PM	Special Council Meeting	Public Meeting
3/8/2022	4:00 PM	Council and Authorities Concurrent Meeting	Public Meeting
3/2/2022	3:30 PM	FIFA update, concert update	Rahul Chandhok, Jas Sajjan, Diana Torres, Josh Stephens & Raj Chahal
3/1/2022	5:00 PM	Special Council Meeting	Public Meeting
2/24/2022	5:00 PM	Special City Council Meeting	Public Meeting
2/16/2022	3:30 PM	Data breach, FIFA, Concerts	Rahul Chandhok, Larry MacNeil, Emily Matthews, Josh Stephens, Raj Chahal, Diana Torres, Jas Sajjan
2/9/2022	3:30 PM	Reaction from policy setting session, city travel policy	Rahul Chandhok, Jas Sajjan, Diana Torres, Josh Stephens & Rah Chahal
2/2/2022	3:30 PM	FIFA timelines, Concert schedules	Rahul Chandhok, Emily Matthews, Larry MacNeil, Jas Sajjan, Diana Torres, Josh Stephens
2/1/2022	4:00 PM	Special City Council Meeting	Public Meeting
1/27/2022	12:25 PM	Concert update info	Rahul Chandhok
1/26/2022	3:30 PM	Public optics of city issues, creek trail concerns, hope for a super bowl bid	Joseph Stephens, Jas Sajjan, Emily Matthew, Larry McNeil, Raj Chahal, Rahul Chandhok
1/25/2022	4:30 PM	Council and Authorities Concurrent Meeting and Stadium Authority Meeting	Public Meeting
1/19/2022	3:30 PM	FIFA bid, water realities, Governor visit, concerts, YSP parking & Behest rules	Jas Sajjan, Emily Matthew, Larry McNeil, Raj Chahal, Rahul Chandhok
1/11/2022	5:00 PM	Council and Authorities Concurrent Meeting	Public Meeting

APPENDIX F: LATE CONTRIBUTION REPORT FORM 497s

Late Contribution Report

Type or print in ink.
Amounts may be rounded to whole dollars.

LATE CONTRIBUTION REPORT

NAME OF FILER
DeBartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC.

AREA CODE/PHONE NUMBER

I.D. NUMBER (if applicable)
488240

STREET ADDRESS

CITY
Santa Clara

STATE
CA

ZIP CODE
95054

Date of This Filing 09/02/2022

Report No. MO-LCR113M

☐ Amendment to Report No. _____
(explain below)

No. of Pages 6

Date Stamp

Page 1 of 6

CALIFORNIA FORM **497**

For Official Use Only

Late Contribution(s) Received

DATE RECEIVED	FULL NAME, MAILING ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED
		☐ IND ☐ COM ☐ OTH ☐ PTY ☐ SCC		
		☐ IND ☐ COM ☐ OTH ☐ PTY ☐ SCC		
		☐ IND ☐ COM ☐ OTH ☐ PTY ☐ SCC		

*Contributor Codes

IND - Individual
COM - Recipient Committee (other than PTY or SCC)
OTH - Other
PTY - Political Party
SCC - Small Contributor Committee

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

Late Contribution Report

Type or print in ink.
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STREET ADDRESS

CITY
Santa Clara

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☐ Amendment to Report No. _____
(explain below)

No. of Pages 6

Date Stamp

Page 2 of 6

CALIFORNIA FORM 497

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Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$325,725.00	11/08/2022
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$2,500.00	11/08/2022
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$9,098.00	11/08/2022

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

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LATE CONTRIBUTION REPORT

NAME OF FILER		Date of This Filing	Date Stamp	CALIFORNIA FORM 497
DeBartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC.		09/02/2022		For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 488240	Report No. MO-LCR113M	Page 3 of 6	
STREET ADDRESS		☐ Amendment to Report No. (explain below)		
CITY: Santa Clara	STATE: CA / ZIP CODE: 95054	No. of Pages 6		

Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$19,250.00	11/08/2022
09/01/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022
09/02/2022	Santa Clara Community Leaders Supporting Anthony Becker for Mayor 2022 Santa Clara, CA 95054 ID# Pending	Anthony Becker Mayor Jurisdiction: Other City of Santa Clara	$8,000.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022 Santa Clara, CA 95054 ID# Pending	Karen Hardy City Council Member District 3 Jurisdiction: Other City of Santa Clara	$180,475.00	11/08/2022

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

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LATE CONTRIBUTION REPORT

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DeBartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC.				For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 488240	Report No. MO-LCR113M	Page 4 of 6	
STREET ADDRESS		☐ Amendment to Report No. (explain below)		
CITY Santa Clara	STATE CA / ZIP CODE 95054	No. of Pages 6		

Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/01/2022	Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022 Santa Clara, CA 95054 ID# Pending	Karen Hardy City Council Member District 3 Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022 Santa Clara, CA 95054 ID# Pending	Karen Hardy City Council Member District 3 Jurisdiction: Other City of Santa Clara	$2,500.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022 Santa Clara, CA 95054 ID# Pending	Karen Hardy City Council Member District 3 Jurisdiction: Other City of Santa Clara	$3,411.75	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Karen Hardy for City Council District 3 2022 Santa Clara, CA 95054 ID# Pending	Karen Hardy City Council Member District 3 Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

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LATE CONTRIBUTION REPORT

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DeBartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC.				For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 488240	Report No. MO-LCR113M	Page 5 of 6	
STREET ADDRESS		☐ Amendment to Report No. (explain below)		
CITY Santa Clara	STATE CA / ZIP CODE 95054	No. of Pages 6		

Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/01/2022	Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 Santa Clara, CA 95054 ID# Pending	Raj Chahal City Council Member District 2 Jurisdiction: Other City of Santa Clara	$180,475.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 Santa Clara, CA 95054 ID# Pending	Raj Chahal City Council Member District 2 Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 Santa Clara, CA 95054 ID# Pending	Raj Chahal City Council Member District 2 Jurisdiction: Other City of Santa Clara	$2,500.00	11/08/2022
09/01/2022	Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 Santa Clara, CA 95054 ID# Pending	Raj Chahal City Council Member District 2 Jurisdiction: Other City of Santa Clara	$3,411.75	11/08/2022

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

Late Contribution Report

Type or print in ink.
Amounts may be rounded to whole dollars.

LATE CONTRIBUTION REPORT

NAME OF FILER		Date of This Filing	Date Stamp	CALIFORNIA FORM 497
DeBartolo Corporation & Affiliated Entities, Including the Forty Niners Football Company LLC.		09/02/2022		For Official Use Only
AREA CODE/PHONE NUMBER	I.D. NUMBER (if applicable) 488240	Report No. MO-LCR113M	Page 6 of 6	
STREET ADDRESS		☐ Amendment to Report No. (explain below)		
CITY: Santa Clara	STATE: CA ZIP CODE: 95054	No. of Pages 6		

Late Contribution(s) Made

DATE MADE	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CANDIDATE AND OFFICE OR MEASURE AND JURISDICTION	AMOUNT OF CONTRIBUTION	DATE OF ELECTION (IF APPLICABLE)
09/01/2022	Santa Clara Neighbors Supporting Raj Chahal for City Council District 2 2022 Santa Clara, CA 95054 ID# Pending	Raj Chahal City Council Member District 2 Jurisdiction: Other City of Santa Clara	$1,992.00	11/08/2022

Reason for Amendment:

FPPC Form 497(June/01)
FPPC Toll-Free Helpline: 866/ASK-FPPC

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Interviews

Numerous interviews were conducted between June 8, 2022 and September 22, 2022.

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This report was **ADOPTED** by the County of Santa Clara 2022 Civil Grand Jury on this _____ day of _____, 2022.

_____

Mr. James Renalds
Foreperson