



DENNIS J. HERRERA
City Attorney

CHAD A. JACOBS
Deputy City Attorney

DIRECT DIAL: (415) 554-4677
E-MAIL: chad.jacobs@sfgov.org

June 11, 2007

Steven Gruel
655 Montgomery Street, Suite 1700
San Francisco, CA 94111

Re: Request for Documents and Interview to Demonstrate Residency in District 4

Dear Steve:

We write this letter for two reasons: first, to confirm our continued request for documents from your client, Supervisor Ed Jew, demonstrating that he has met the residency requirements of the City's Charter; and second, to one last time renew our request for an in-person interview of the Supervisor.

As we discussed on Friday, June 8, 2007, the documents that your client provided to this office did not fully respond to our initial request. For example, your client provided tax returns for 2005 and not 2006, and he did not include schedules that may have a bearing on the residency issue. Your client provided no responses related to our request for documentation of telephone or cable services associated with 2450 28th Avenue, provided incomplete records of other utility services, and gave incomplete or no responses to our request for information related to homeowner's tax exemptions and renter's tax credits. We reiterate our request for the documents that your client failed to provide last week. While you stated in your cover letter that the Federal Bureau of Investigation ("FBI") might have seized some information relevant to our inquiry, we are unclear whether you meant the documents mentioned above or other documents. To that end, it would help our inquiry if your client would provide to us a copy of the search warrant receipt from the FBI and a list of the relevant documents or categories of relevant documents he believes the FBI has taken.

In addition, as I mentioned to you in our Friday conversation, the documents your client provided to us do not persuasively demonstrate that he resided in District Four under the requirements of the Charter. Most of the documents he provided relate to the address he claims is his business address on Waverly Street. Therefore, we would like to offer your client a final opportunity to provide us with *any* documentation or other information that demonstrates his actual habitation at 2450 28th Avenue or his intent to make 2450 28th Avenue his domicile on and after July 1, 2006. Examples might include: (1) a clear statement about where your client and his family have since June 1, 2006 spent their nights and kept their household belongings – i.e., clothing, house wares, jewelry, and family photographs; (2) copies of any homeowner's or renter's insurance policies in your client or his spouse's name for the period June 1, 2006 to the present; or (3) copies of automobile insurance policies for any vehicles registered to your client or his spouse; (4) copies of any bills, including internet or credit card bills, that your client or his wife receives or has received at 2450 28th Avenue; (5) proof of magazine or newspaper subscriptions delivered to your client or his spouse at 2450 28th Avenue between July 1, 2006 and the present; and (6) additional statements from neighbors. These are just examples, and you may redact personal or financial information from any documents you produce, so long as the redacted information is not relevant to the question of your client's residency. We welcome any

Letter to Steven Gruel
Page 2
June 11, 2007

further information of any kind that your client can provide that demonstrates that 2450 28th Avenue was and is his domicile for the relevant period.

For the same purpose, we renew our request to interview your client to resolve the factual issues related to our inquiry as expeditiously as possible. As I noted to you in our discussion last Friday, the Supervisor or his representatives have continued to make statements to the press about his residency, including as late as last Friday. If your client is able to make statements to the press regarding the status of his residency, then we do not understand why he is unwilling to make statements on the record to this office. If he refuses such an interview, we will be left with the written information you have provided and the statements he and his representatives have made to the press as representing his side of the story.

As I have noted to you and other attorneys providing legal representation to your client in this matter, we believe it is in the public interest to resolve this matter as quickly as possible. **With that in mind, we ask that your client provide us with the documents and information we request in this letter and make your client available for an interview, all no later than the close of business on Friday, June 15, 2007.**

Please do not hesitate to contact us if you or Supervisor Jew have any questions related to this letter or if you are willing to establish a date and time for an in-person interview between the Supervisor and this office.

Very truly yours,

DENNIS J. HERRERA
City Attorney



Chad A. Jacobs
Deputy City Attorney