

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



FROM: Human Resources Department

SUBMITTAL DATE:
June 18, 2014

SUBJECT: Appointment of County Counsel [District- All] [Ongoing Cost - \$333,817] [SOURCE OF FUNDS- Departmental Budget]

RECOMMENDED MOTION: That the Board of Supervisors:

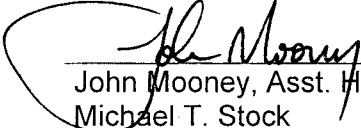
1. By Minute Order, appoint Gregory P. Priamos to the position of County Counsel effective July 29, 2014, for a four year term as provided by Section 27640 et seq. of the Government Code

BACKGROUND:

Summary

The Board interviewed two candidates for the County Counsel position. After careful evaluation of the candidates, the Board appointed Gregory P. Priamos to serve a four-year term as County Counsel effective July 29, 2014, at a starting salary of \$241,897 and associated unrepresented management benefits.

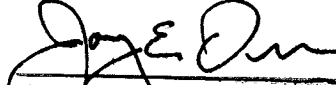
Departmental Concurrence


 John Mooney, Asst. HR Director for
 Michael T. Stock
 Asst. County Executive Officer/
 Human Resources Director

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost:	POLICY/CONSENT (per Exec. Office)
COST	\$ 308,139	\$ 333,817	\$ N/A	\$ 333,817	Consent <input type="checkbox"/> Policy <input type="checkbox"/>
NET COUNTY COST	\$	\$	\$	\$	

SOURCE OF FUNDS: Departmental Budget Budget Adjustment: No
For Fiscal Year: 14/15

C.E.O. RECOMMENDATION: APPROVE

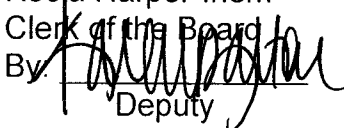
BY: 
 Jay E. Orr

County Executive Office Signature

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Tavaglione, seconded by Supervisor Ashley and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Jeffries, Tavaglione, Stone, Benoit and Ashley
 Nays: None
 Absent: None
 Date: June 24, 2014
 xc: HR

Keca Harper-Ihem
 Clerk of the Board
 By: 
 Deputy

- A-30
- Positions Added
- 4/5 Vote
- Change Order

Prev. Agn. Ref.: District: All **Agenda Number:**

**SUBMITTAL TO THE BOARD OF SUPERVISORS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
FORM 11: Appointment of County Counsel [District- All] [Ongoing Cost - \$333,817] [SOURCE OF FUNDS- Departmental Budget]**

DATE: June 18, 2014

PAGE: 2 of 2

BACKGROUND:

Summary (continued)

Mr. Priamos has more than 26 years of experience with 21 of those years working for the City of Riverside. For the past 13 years, Mr. Priamos has been the City Attorney, General Counsel, and Chief Legal Advisor to the Mayor and City Council of Riverside. He has provided day-to-day management, development, and continued implementation of numerous legal services for the City of Riverside.

From 1993 to 1995, Mr. Priamos held the position of Assistant Attorney III for the City of Riverside. He was then promoted to Supervising Deputy City Attorney in 1995, where he was the Supervisor-in-Charge of the Litigation Services Section and Legal Advisor to the Riverside Municipal Airport, Airport Commission, Riverside Police Department, and Riverside Fire Department. Mr. Priamos received his Bachelor of Arts degree from the University of Southern California, and his Juris Doctor from Loyola Law School.

Mr. Priamos brings the knowledge and experience vital to this position and will undoubtedly fulfill the needs of the position, and maintain the continuity and stability within the department.

Impact on Residents and Businesses

There is no anticipated impact to citizens or businesses.

With Ken
for
6/27
strongly
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Riverside
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CA

us Profile Sign Out Home

Karen Doris Wright is STRONGLY AGAINST Riverside County hiring Gregory Priamos as Rive Tuesday, June 24, 2014 9:09 AM

side County Council, because I believe he does NOT have citizens best interest at heart and t hereby makes decisions and takes actions against citizens best interests. I believe his actio ns have also helped lead the City of Riverside into deep financial debt which will take tens of years to climb out of.

From: "K Wright" <twodogkd@yahoo.com>
To: "district1@rcbos.org" <district1@rcbos.org> "district2@rcbos.org" <district2@rcbos.org>
"district3@rcbos.org" <district3@rcbos.org> "district4@rcbos.org" <district4@rcbos.org>
"district5@rcbos.org" <district5@rcbos.org>
Bcc: "district1@rcbos.org" <district1@rcbos.org> "district2@rcbos.org" <district2@rcbos.org>
"district3@rcbos.org" <district3@rcbos.org> "district4@rcbos.org" <district4@rcbos.org>
"district5@rcbos.org" <district5@rcbos.org>

To Riverside County City Clerk and Riverside County Supervisors

From Karen Doris Wright 4167 Central Avenue, Riverside, CA

Subject: Karen Doris Wright is STRONGLY AGAINST Riverside County hiring Gregory Priamos as Riverside County Council, because I believe he does NOT have citizens best interest at heart and thereby makes decisions and takes actions against citizens best interests.

I have comments against him in a number of areas, not the least of which is that Gregory Primos personally targeted me at Riverside City Council asking the Riverside Police to arrest me, likely at the behest of former Mayor Loveridge who I had spoken out against at the morning session, but also for his own pleasure as he did not like me or what I had to say at Council against actions/inactions of the Council/Mayor/City Manager/City Attorney which were not in the best interests of Riverside citizens. The arrest was illegally done as I was arrested when I paused on the way back to my seat to ask the MAYOR/ Council to STOP the POLICE HARRASSMENT, when I again found a policeman near me after I finished speaking at the podium. The policeman DID not stop me from speaking, I stopped speaking and turned to return to my seat and only then found the policeman was there.

The policeman who wrote up my arrest said he was directed by Priamos to arrest me. Mayor Loveridge was also in cahoots in this deal because he

Submitted by Karen Doris Wright
6-24-14 Item 3-7
(date)

NEVER told me my time was up, which was unusual, he only said Karen very softly which he had never done previously.

Greg Priamos rode along with Brad on the this eminent domain ride, and helping with the legalities of getting monies for WANTED items, which pushed Riverside ever deeper in debt, with no seeming consideration for impacts of his actions or lack of advice to steer clear of certain situations or debt.

The article below describes the then coming eminent domain fiasco in Riverside which Brad Hudson and Greg Priamos worked together to make happen, done largely to benefit the insider folks.

The Inland Empire Weekly article told the story of Riverside Eminent Domain, which Brad Hudson was hired to do, and which carried out over the years:

Friday Morning Club misses THE INLAND EMPIRE WEEKLY and it's in depth reports on some critical Issues (Note: While IE Weekly is no longer published prior issues are still available online <http://ieweekly.com>.) Looking back at one such feature IE Weekly article published July 5, 2007 <http://www.ieweekly.com/news.htm> MASTERS OF THEIR EMINENT DOMAIN (highlighting/underlining added)

Riverside City Hall declares war on private property

By David Silva <http://ieweekly.com/2007/10/news-stories-2/news-stories/masters-of-their-eminant-domain/>

Across this expanse of concrete and desperation known as the city of Riverside, the signs of progress are everywhere. You see them in the glistening eyes of dark-suited investors as they gaze dreamily upon neighborhoods that were formed before the developers' parents were even born. You see them on the sides of boarded-up buildings, row after row of them, on pasteboard signs heralding a promise of new and wondrous things to come. "Coming Soon! Coming Soon!" the signs proclaim. "New shops and theaters and movie screens and fine dining! New town homes and loft-style condominiums! Come be a part of the New Riverside!"

North and south and east and west, from the hillsides to Casa Blanca to the riverbed to UCR and beyond, the air around you is heavy with the smell of money, while the earth beneath you trembles from the onslaught of heavy equipment. Riverside is a city on the move, and if you didn't know it, you'd think that where it's moving toward is a place previously untouched by civilization. It's as if City Hall found a way to roll back a curtain to reveal hundreds of new acres of bright and unblemished land just begging to be built upon. And, in a sense, it did.

These are exciting, momentous times, if you're young or new or fabulously wealthy, and it would all be perfect were it not for the perpetual whining of those other people, those remnants of the Old Riverside, who are neither young nor new nor wealthy. For those people, far more numerous than the city's bought-off leaders would like you to believe, the changes happening all around them are not to be celebrated, but feared. Fear is another sign you see everywhere—on the faces of powerless merchants and lifelong residents as they gaze nervously at the bulldozers outside their door, as they look out from the shadows like those earlier Americans, who watched silently as the Conquistadors unloaded their ships upon supposedly virgin sands.

The Riverside City Council, from where all these new and wondrous changes emanate, has been bitten and bitten hard by the eminent domain bug. Over a three-year period, the Riverside Redevelopment Agency—really, just the City Council meeting at a different time of day, but with vastly expanded authority—filed 18 separate eminent domain lawsuits on property owners whose lands (and the businesses that sat upon them) the city coveted. The lawsuits commenced a process through which the owners would see their property taken from them, to be handed over later to complete strangers.

While some owners have chosen to fight the suits, most simply packed it in and left.

Under eminent domain, a government agency can seize private property by having the courts condemn it and force the owners to sell it to the agency at a supposedly fair-market price. The process was originally intended to allow the government to improve a blighted area—to avoid, for example, a scenario in which a single, agoraphobic shut-in's unwillingness to move blocks efforts to clean up an entire slum. But over the years, the process drifted,

with more and more municipalities using their eminent domain powers to make their already pretty towns even prettier. The issue came to a head of sorts in New London, Connecticut, where the town fathers moved to expand its tax base by seizing private residences and handing the land over to Pfizer Pharmaceutical Corp. The residents sued, resulting in the landmark 2005 Kelo vs. the City of New London decision, in which the Supreme Court ruled that the benefits of economic growth was a good enough a reason for a city to seize private land for commercial use. But the Court left it to state and local governments to come up with their own eminent domain policies, and since 2005, states including Florida, Michigan and New Hampshire (and Orange County cities including Anaheim, Costa Mesa and Newport Beach) passed laws restricting the practice.

But while other government agencies were recoiling in horror from the Kelo decision, some cities, like Riverside, sensed an opportunity. Sometime over the past three years, or perhaps earlier (it's hard to say, because Riverside City Hall doesn't talk much to the nonaligned press), the council got it in its head that nearly everything wrong with the city—its moribund downtown, its stunted tax revenue, its inability to attract and keep new businesses—was the fault, not of the council and its misguided policies, but of an unproductive constituency that simply refused to go away. This notion, lovingly nurtured by the sweet milk of out-of-town developers' money, germinated into a working philosophy, which City Councilman Dom Betto expertly articulated when asked why the city condemned an entire downtown block for use by private developers.

"What you have here are long-term property owners who have done nothing to improve their properties, while their properties have appreciated 300 percent," Betto tells the Weekly . Betto represents downtown Riverside, where most of these unhelpful owners once thrived. "These property owners are, in fact, a detriment to the downtown area, and these property owners have no interest in improving them."

In other words, the council has seen the problem, and the problem is this crazy concept called private property. If those pesky property owners won't take a hint and go of their own accord, the city will force them to go—the owners, that is. The properties themselves—well, the city would just take that and hand them over to interests more to its liking.

A handful of the city's eminent domain lawsuits were true to the original spirit of eminent domain, such as the condemnation of rundown, seedy motels that have long been the bane of the Riverside Police Department. But most were simply the Redevelopment Agency wading into the real estate speculation game by kicking out the original businesses and replacing them with fancy new developments.

Such was the case with the city's acquisition of businesses on the downtown block bordered by Market and Mission and 1st and 3rd streets. In lawsuit after lawsuit filed November 2, the city moved to condemn a dozen parcels of land to make room for Raincross Promenade, a tony housing project by LA developer Mark Rubin. This action, one of the largest and, at an estimated \$5.4 million, one of the most expensive condemnation efforts in the city's history, resulted in dozens of merchants and their employees being forced to find work elsewhere.

Rubin, incidentally, is listed by Betto as a key endorser of his council re-election bid.

Across the street, business owners—scared out of their wits by what any fool could clearly see coming—quickly sold out to Beverly Hills developer Alan Mruvka, who wants to build 125 residential and live/work units between 1st and 3rd streets along Market.

"We didn't really have a choice, did we?" says Lee LeMunyan, the co-owner of Bader Motors, who sold his property to Mruvka and shut down the business in May. "The city doesn't want older businesses here. They want new businesses for a new tax base—then they'll be happy. Wherever we go after this, I can promise you it won't be Riverside."

Mruvka, incidentally, donated \$500 to Betto's re-election bid. A company called CityWorks, LLC—listed as the developer of Maric College in Riverside and holding the same post office box address as Mruvka—contributed \$1,500 to the Betto campaign. Mruvka and CityWorks also donated a total of \$1,000 to Riverside Councilman Steve Adam's re-election effort.

LeMunyan wouldn't disclose how much Mruvka paid for his property, but added that he believes the developer got a screaming hot deal. This raises the question of just how much money the city is compensating the property owners for their lands and businesses.

Under California law, cities are supposed to provide landowners fair-market value for their condemned properties and economic assistance in relocating their businesses. But a look at the eminent domain suits filed by Riverside Redevelopment shows the city acquired or is seeking to acquire condemned properties at prices that would make seasoned realtors salivate.

In the case of Riverside Redevelopment Agency vs. Steven Kovely , for example, the city is suing to acquire an 8,663 square-foot single-family home at 3159 Main St. for \$170,000; a single-family home of the same size at 3167 Main for \$230,000; a duplex of the same size at 3741 2nd St. for \$340,000;

and two used car lots totaling 28,800 square feet for \$842,000. The case is still being fought. Betro, however, sees nothing wrong with any of this.

"Every single one of these cases, we settled on a price with the owner," he says. "In most cases, it's a very favorable settlement. We pay all legal fees. In all cases, the property owner gets more for the property than its appraised value. This pays for legal fees involved, and they get tax benefits."

Tell that Chol Sun Pak, former owner of a 21,263 square-foot storage and fast-food business at 3158-62 Main St. In RDA vs. Chol Sun Pak, filed November 2, the city paid \$540,000 for the land and the improvements on it. Minus fees to one of his attorneys, Pak received a grand total of \$218,500—payable to his other attorney. That remainder is less than a third of the \$700,000 proposed asking price for just one of Mruvka's residential units.

Betro says he doesn't understand why the displaced property owners are so upset. The city, after all, paid them fair-market value for their land. It's that kind of indifference to the plight of condemnation victims that sets state senator Tom McClintock's teeth on edge. After the Kelo decision, the senator—a Republican who represents cities in north LA County—introduced legislation that would have prohibited the seizure of private property for commercial use. The bill never made it off the senate floor.

"Governments like Riverside will tell you 'we very rarely take property by eminent domain,' because the owners always settle," he says. "That's like saying a gun is very rarely fired during a robbery. But it's the fact the gun is pointed toward your head that the property is given."

"What is your property worth to you? It's worth what someone else is willing to pay for and what you're willing to sell for. It's based on a mutually agreeable price. It used to be that if a widow didn't want to sell her home to developers, she didn't have to and that was the end of the matter, unless the government sent a bunch of thugs in. Now, the government has become the thug."

The reaction among many Riverside residents over City Hall's eminent domain craze was to literally go ape. Eminent domain was the hot-button issue in the ongoing council election campaigns, with Betro, Adams and Councilman Art Gage facing an upcoming runoff election against candidates who have put the issue front and center before the voters. A group called Save Riverside, founded by resident Paul Odekirk, regularly holds rallies around the city featuring a woman in a gorilla suit holding a sign reading ANYONE BUT BETRO.

"I lived in another city for about 12 years, and when I came back, I started looking for some of the old businesses I used to patron," Odekirk says. "Many were gone, and the ones that were there, people were told they were going to be torn down soon. So I put together this group, to try to change what I could for the better. Once, I was handing out flyers for a meeting, and Betro came by and grabbed one and threw it on the ground, and called me an 'outsider' to my face. That just made it easier for me."

City Hall has taken a decidedly "blow me" attitude toward the anti-eminent-domain crowd. When resident Ken Stansbury tried to put a charter amendment on the ballot restricting condemnation, the city sued him, claiming that eminent domain was a state issue. The suit so far has produced a win for the plaintiff at the county level, and a recent tentative ruling by an appellate court in favor of the city.

When residents Yolanda Gardner [sic, should be Garland], Marjorie Von Pohle and former council candidate Letitia Pepper tried to talk about eminent domain at a council meeting in February, the council promptly kicked them out of the room. No more telling image of the council's disdain for the opinions of its residents can be found than that of Von Pohle, a community activist who, at 89, is often referred to as the "Grand Dame of Riverside," being escorted out of council chambers by Riverside police.

When the Weekly asked city spokesman Austin Carter for a meeting to discuss the proposed Riverside Renaissance, a citywide building program that promises to bring about yet more condemnation lawsuits, Carter initially responded with, "That depends on the questions you'll ask." He later called to say that no one in the city was available to discuss the \$1.2-billion plan. When we called for comment on this story, he replied, "We read your 'Code Red' article [on Riverside code enforcement abuse, archived at iweekly.com]. We don't comment to the Weekly."

Such an astonishingly arrogant attitude has served only to increase the fears of residents. Web sites like RiversideLandGrab.com and political forums on Craigslst.com positively boil with paranoia, as locals fill in the gap left by the city's unwillingness to dialogue by trading conspiracy rumors. Some of the rumors, such as the city tweaking municipal law to make code enforcement another path to condemnation, may ultimately prove accurate. Others—such as Betro being merely the puppet of five angry lesbians who live in the hills—are just nutty.

Still, Betro sees nothing amiss. When we asked him about the appropriateness of the city taking private property for commercial use, he insisted—enthusiastically insisted—that all this talk of eminent domain was a lot of hooey.

"First of all, we have gone as far as we can possibly go to say that we in the city of Riverside will not take a privately owned residence under any

circumstance," he says. "You need to separate that out, the private home, which is what most citizens are concerned about. We passed a resolution of necessity—we have about 20 properties that we passed a resolution of necessity on. We said we want this property; we want to enter into negotiations with the owners. If the negotiations fail, we'll go into court to get it. Every single one of those has sold. We have not had to go to court to enact an eminent domain decision. We do not have one property that has been taken as a result of legal court action."

Respectfully to Mr. Betro—who at least had the courage to return our call—but that's absolute bullshit. Yes, in Betrospeak, the city passed its "resolution of necessity," as he claims—but the city also filed a whopping 18 separate eminent domain lawsuits over a three-year period, an extraordinarily high number when eminent domain is supposed to be the last resort for a city to take. How about the single-family homes mentioned in RDA vs. Kovely, under the heading "Notice of Deposit—Action in Eminent Domain?" How about the 17 other cases we found—rather easily found, as they were each titled "Complaint in Eminent Domain?" Or were those all one big clerical error?

Maybe Betro believes that since the property owners settled with the city, they weren't really sued after all. Maybe he assumed we wouldn't know where to look for the lawsuits. Or maybe, just maybe, he was simply too busy counting all his money from developers to pay attention to what he was saying. According to his April 30 campaign finance statement, Betro took nearly \$20,000 from developers, realtors, and attorneys specializing in real estate law. His council colleague, Steve Adams, took more than \$25,000. That's nearly a third of all Betro's campaign donations for the filing period, and more than half of Adam's donations. That, of course, isn't even counting more than \$88,000 Adams received from the development community during his recent state Assembly run. But it is counting the donations from companies like Mruvka, Turner Development of Newport Beach, Palm Desert Development Co. of Palm Desert, LM Powell Development Co. of Anaheim, and so on.

Asked about the appropriateness of taking so much development money at a time when residents are convinced the city is gunning for their homes, Betro gets defensive.

"If you analyze my statement, you'll see I have donations from 300 individuals. To single out one category from all the contributions, that's probably a very narrow perspective. I understand what you're saying, but people should look at my track record. Before I came in, the way it was all done was all sole-sourced. I restored competition, where we put out requests for proposals and people got to compete."

Word to Betro: Perhaps suggesting we look at your track record isn't the best defense for having accepted so much out-of-town development money at a time when your constituents are freaking out about eminent domain.

But Betro does make a strong point when he mentions those 300 individual donations: The guy's got a lot of support in the city, particularly in some of the more upscale neighborhoods where residents are perfectly content to see those ugly old shops go away to make room for the lofts and boutique shops. At any rate, voters will get a chance to decide who best represents their interest when the city holds its runoff election November 6.

State Sen. McClintock has a definite idea what voters should keep in mind when they enter the ballot booth.

"Every person needs to watch very carefully how their local officials are voting on these (eminent domain) thefts," he says. "I will absolutely guarantee you that if your city councilman is willing to seize your neighbor's property, that same councilman is perfectly willing to seize yours as well."

NEXT WEEK: Why you won't read about any of this in the Riverside Press-Enterprise.

Regarding City Attorney's objective statements for the ballot regarding ballot initiatives, I don't believe they are. I believe he slants these to benefit the insiders? Are these as objective as they should be? I don't think the La Sierra initiative fairly identifies what will be lost if Prop R and Measure C are lost as these do not just address the open space but go far beyond. I don't think Priamos fairly addressed what citizens could lose. He did mention Prop R and Measure C but did not mention all the protections that would be lost.

I personally believe Riverside City Attorney Gregory Priamos has been an attorney benefiting insiders/developers and has not been there to represent the best interests of Riverside Citizens.

The fact that there are NO CONTRACTS with BB&K to tell the scope of work etc is clear evidence that something is terribly wrong her in River City and I hate to think of County residents being subjected to the same.

Karen Doris Wright

Karen Doris Wright

I also agree with reasons Letitia Pepper will be presenting orally, including that Greg Priamos legal advice to the City Council that "moratoriums are illegal," as well as his advice that applauding would be a good idea . . . his failure to stop the City from misusing bond money in ways that would make the bond payments non-tax-deductible . . . his practice of signing reports "approved as to form only" etc.

I'm also going to object to the method of hiring him discussed in the Desert Sun article.

To: Riverside Supervisors Jeffries, Tavaglione, Stone, Benoit, and Ashley
cc: Jay Orr, CEO
From: Letitia E. Pepper
Re: Objection to County's Plan to Hire Greg Priamos as County Counsel without Advertising the Position or Interviewing Other Candidates
Date: June 24, 2014

- Why would the County hire, as County Counsel, someone who would:
- advise a City Council that "moratoriums are illegal,"
 - subject government officials, including himself, a Chief of Police, and a Mayor, to a lawsuit for which they do not have qualified immunity and may therefore be held liable for damages, including punitive damages
 - allow his City client to take actions, which, if discovered, may render the income from City Bonds to be non-tax-deductible, and render all future bonds issuable on less favorable-to-the public-entity terms?

This, by the way, is not an exclusive list, but just a few notes about some of Mr. Priamos's most *recent* faux pas.

After more than 25 years of watching Greg Priamos's performance, first as a deputy City Attorney, and then as Riverside's City Attorney, I am appalled that the County's Board of Supervisors would knowingly plan to foist Mr. Priamos off on County residents as an expert on laws related to running a government entity -- and plan to do so without even bothering to advertise the job opening and consider other applicants, as stated in The Desert Sun's article, "Greg Priamos in Line to Be Riverside County Counsel." (<http://www.desertsun.com/story/news/2014/06/22/greg-priamos-riverside-county-counsel-jeff-stone/11251599/>)

I first heard of Greg Priamos in the 1980's when an attorney friend, Gilbert Gaynor, called to complain that Greg Priamos was not returning Gaynor's phone calls. Greg was just a deputy city attorney, and had helped the City create a patently unconstitutional ordinance against begging. My friend, Gilbert Gaynor, represented a group called Soldiers of the Cross, and had just successfully sued the City of Indio -- and its outside legal counsel -- for creating and adopting an essentially identical ordinance, which, as Gaynor told me in astonishment, had "flown in the face of 40 years of Supreme Court precedence!"

Gaynor had told the City of Riverside that he would not sue it to invalidate its similar ordinance, as long as the City agreed to leave his clients alone. Mr. Priamos had agreed to this deal, but then the police began to, and continued, to cite the Soldiers of the Cross, members of a religious organization who wear very distinctive outfits, and are not readily mistaken for your average panhandler.

Submitted by Letitia Pepper
6-24-14 Item 3-1
(date)

Gaynor kept calling the City to try to talk to Priamos about this breach of their agreement, but Greg simply failed to return his calls. So, as a consequence, the Soldiers sued the City in federal court and won very handily (I was able to be present for the oral argument on the preliminary injunction) -- which meant that the City was not only forced to pay the Soldiers' attorney's fees and costs, but also ended up with an unnecessarily invalidated law against *all* panhandling.

Why? Because Greg Priamos failed to return phone calls. So he didn't bother to keep the City's side of a bargain to which he had already agreed, one that had benefited the City and would have allowed it to continue to apply its unconstitutional ordinances to panhandlers.

That was my first inkling of Greg's abilities as an attorney. It's one thing to refuse to settle, but another thing to agree to a favorable settlement and then neglect it and end up in litigation simply because you don't return calls.

Mr. Priamos, between then and the past few years, also engaged in such unlawful activities as arranging to have the police prevent citizens from attending a public meeting by physically blockading the entrances (this is illegal in the absence of a court order that a person may not attend a public meeting), sending citizens threatening letters falsely accusing them, in general terms, of intentionally disrupting public meetings (with the obvious intent to try to chill their future speech), and directing the police to remove a specific citizen from the speaker's podium before such person had spoken or had engaged in any conduct that intentionally disrupted a public meeting.

This last little direction to the police resulted in the handcuffing of an older, disabled woman during a city council meeting, with a resulting video of the event that resulted in not merely national, but international Internet stories and a lot of negative publicity for the City of Riverside. It also resulted in more negative publicity and a letter of complaint to the City Council from the Riverside Police Officer's Association when Priamos's story about the impetus for the arrest disagreed with the police officer's version of events.

More recently, when one of the City's neighborhoods began to complain about building permits that were being issued to create unlawful uses in its R-1-zoned area, Priamos repeatedly told people, including the City Council, that "moratoriums are illegal." Moratoriums are *not* illegal, as I and my neighbors well knew. No City Attorney could possibly believe that "moratoriums are illegal," and sure enough, we now *have* a moratorium.

More recently, and more personally, Priamos advised Mayor Rusty Bailey to go ahead and sign a citizen's arrest form (in which a necessary and relevant provision had first been lined out!) for *my* arrest for allegedly intentionally disturbing a public meeting when no such disturbance had occurred, and when

proof of such fact consisted of the very helpful City-controlled video tape of the meeting. Not only did this result in more unfavorable publicity for the Mayor (especially with members of the large audience present for the arrest), *but it also made the Mayor, City Attorney, and Chief of Police completely vulnerable to being sued in their individual capacities, rather than merely as government officials and employees.*

Why? Because while government officials have qualified immunity for many, many tortuous actions, they do *not* have qualified immunity under the civil rights laws (which apply to violations of the right of free speech) for false arrest and false imprisonment.

Do you really want to hire, as County Counsel, someone who can't figure out how to avoid subjecting himself, let alone *elected* government officials like a Mayor, to personal liability for damages, including punitive damages? No reasonable elected official would want this kind of legal representation, given that these kinds of damages must be paid out of the individual defendants' own pockets, and which are not reimbursable from government funds.

This particular bit of bad advice resulted in such a great lawsuit (from the perspective of me, the victim) that not only did the DA refuse to file charges against me, but *three* attorneys have all agreed that this is such a great lawsuit that they are all collaborating on litigating it; it has just been filed in federal court as *Pepper v. City of Riverside, William R. Bailey, Greg Priamos, and Sergio Diaz.*

It's bad enough to subject your client's elected officials to personal liability for punitive damages, but subjecting your client's *credit rating* to serious damage is even worse, at least from the perspective of the citizenry of that client, who will end up living with the consequences of such adverse credit ratings when the client's bonds are sold.

Not long ago, the City Council voted to increase the sewers fees by *tripling* them over the next five years. Why? Because the sewer funds that had already been obtained from bond proceeds were no longer there. Where did the funds go?

It appears that City of Riverside funds were treated like Enron treated its various related entities' (and fake entities') funds: creative accounting and the moving of monies between accounts and entities via poorly documented loans and transfers. That's a very risky thing for a government entity to do, because when bond proceeds from nontaxable government bonds are misused for purposes other than those for which the bonds were issued, the income from the bonds -- which is supposed to be non-taxable -- becomes taxable to the bond holders. This, in turn, makes investors loathe to buy future bond issuances from the government entity that f***ed up like this already. **It also makes the government entity which**

intentionally and knowingly engaged in such activities vulnerable to suit by the bond holders, and to suit by federal regulatory agencies.

In fact, not long ago the Miami Herald reported on bond-related problems of two Florida cities. Michael Boudreaux, the former budget director for the City of Miami, as well as the city of Miami itself, were charged by the U.S. Securities and Exchange Commission with civil securities fraud for allegedly misrepresenting city finances to bond investors. "In connection with this, Boudreaux was accused of orchestrating financial transfers 'to mask' mounting deficits and 'falsely inflate' reserves reported in the city's 2007 and 2008 financial statements, the SEC said. 'Miami cannot continue to play shell games with its finances,' Eric I. Bustillo, director of the SEC's Miami regional office, said in a statement. . . .

"The SEC [s]eparately, . . . charged the city of South Miami for fraudulently failing to disclose problems with the tax-exempt status of bond deals. South Miami agreed to settle the charges and hire an independent consultant to oversee some future bond deals." (The Miami Herald, "2013: A dirty year when it came to public corruption in Miami-Dade" (12/28/2013); <http://www.miamiherald.com/2013/12/28/3839593/in-dirty-dade-the-year-of-the.html#storylink=cpy>.)

Did Mr. Priamos know what was going on? Of course he did, as circumstantially evidenced by the fact that, many years ago, his contribution to staff reports on agenda items began to be only the simple notation "approved as to form." Since when do governments pay their top attorney hundreds of thousands of dollars a year to approve the *form* of a report, instead of the substance of its contents? Just last week, on June 17, 2014, Agenda Item 20 included a report that *erroneously* opined that the developer had "complied with all conditions," and that his approvals had not expired, so that his development could proceed. The report also advised the Council to vote yes on an item which would have stuck the City with a deed of trust in lieu of surety bonds -- on a property with lots of potential problems, including hazardous and toxic waste spills.

These are the kinds of legal issues on which a real legal opinion is needed, not a mere "approval as to form." But sure enough, on the Report for Agenda Item No. 20, the following "credit" for the report is given:

"Prepared by: Thomas J. Boyd, P.E., Public Works Director/City Engineer
Al Zelinka, FAICP, Community Development Director

"Certified as to availability of funds: Brent A. Mason, Finance
Director/Treasurer

"Approved by: Deanna Lorson, Assistant City Manager for Scott C. Barber,
City Manager

"Approved as to form: Gregory P. Priamos, City Attorney" (emphasis added) .

How about that? The Public Finance Director/Treasurer actually certifies the availability of funds discussed in the report, but the City Attorney doesn't even express, let alone *approve*, the *legal opinions* contained in the report. And for this he gets paid hundreds of thousands of dollars a year? (As an aside, in *my* legal opinion, a City Attorney can't hide behind the ruse of saying he approves a report that *actually expresses any legal opinion* only as to "form." Such a statement is clearly an *attempt* to claim that he is approving the report as to form *only*, but it won't help him avoid liability for what the report actually says about legal matters.

After all, to review the report's "form" he had to read it. Does Mr. Priamos really think that he can avoid taking responsibility for the legal conclusions and opinions expressed in the contents of any report he reads by implying he approved only its "form"? Can he legally avoid the duties of his job as City Attorney by claiming he only reads reports to make sure their form is correct, and that he has no responsibility for their legal contents? Just who is he going to claim drew up all the legal conclusions the report expresses, the Assistant City Manager? The Tooth Fairy? No.

Really, just why is the County in such a hurry to hire Mr. Priamos? According to the Desert Sun article, Supervisor Stone thinks Mr. Priamos has *reduced* litigation in the City of Riverside. That might be a good reason if it were true, but I have no reason to think it is true, I certainly would like to know the actual *facts* on which Supervisor Stone's opinion is based.

I cannot help but fear the County's *real* interest in hiring Mr. Priamos is exactly because of his willingness, over the years, to go along with these kinds of creative fund transfers, especially in connection with redevelopment funds and Community Facilities District funds. Coincidentally, the City's big problems with inter fund transfers, including redevelopment fund transfers, can be traced back to the County, since they began when Brad Hudson, a County employee, was hired by the City as City Manager in a sweetheart deal with no real advertising or search for an alternative.

Hudson then brought County employees over to the City to assist him in his style of managing City funds, and he and Priamos obviously saw eye to eye about redevelopment as a useful tool for creative money management. So could it be that now the County needs this kind of "vision" if it's been engaging in less than straightforward deals using the funds earmarked for specific projects in non-specified, illegal ways?

Letitia Pepper
P. O. Box 55560
Riverside, CA 92517

FROM THE DESK OF

KEITH J. NELSON

April 29, 2014

Honorable Mike Soubirous
City of Riverside
3900 Mail Street
Riverside, CA. 92506

RE: Code of Ethics - J. Hunter v. Human Resources Board members

Dear Mr. Soubirous,

It was a pleasure speaking with you recently at the Boards and Commissions Annual Dinner. Unfortunately, my message today concerns a most troublesome matter. Let me begin by stating emphatically that this letter is not private. Instead, it is intended for you to share with your colleagues on the City Council, and whomever else you deem it contents would benefit. I would, in fact, read this letter into public comment at the next City Council meeting, but it would I'm certain exceed the three minute limitation allowed for such.

I will go off topic for just a moment and formally introduce myself in an effort to create clarity as to my interest and involvement in this matter. I am a 25+ year resident of Riverside who has endeavored to remain active in our community. As you may recall when you were running for Council, I contacted you to discuss your views and commitments on certain issues I feel important to our city. I have three adult children, plus one I am still raising here. I have been involved at many different levels with the city and surrounding area, including but not limited to: the Commission on Disabilities (chairman), Inland Regional Center (Board of Trustees), Team USA Special Olympics (coach), Special Olympics of Southern California (Regional Advisory Council), Regional Center (Business Committee), Arlington Little League (coach, Board of Directors), AYSO Region 47 soccer (founder, coach, Board of Directors), Poly High School Special Needs Boosters clubs, Poly High ROTC Boosters club...and more. I hope that this listing demonstrates my commitment to our community. I have always wanted to be proud of the city I live in.

To the matter at hand: I have served on a few Code of Ethics and Conduct adjudicating bodies ("AB") during my tenure as the Chairman of the city's Commission on Disabilities. I have always taken this responsibility extremely serious. If you were to review the administrative records of these hearings, I believe you would find that I often ask the most questions on the AB and deliberate issues of concern at substantial length. As a commissioner and member of an adjudicating body, I find our job comes with a multiple of masters: to our fellow citizens by striving to improve the city in which we live; and to the

6411 MERLIN DRIVE RIVERSIDE, CA. 92506 (951) 398-1024

Submitted by Jason Hunter
6-24-14 (date) Item 3-1

Council itself, representing our local government towards achieving the highest level of integrity.

Out of all the ethics hearings I have been involved with, the case involving Jason Hunter really bothers me the most from many perspectives. First, the role of the City Attorney's office, throughout the entirety of the process, was deeply concerning. At the ethics hearing, we were instructed by the City Attorney's office that it could both represent the city (Human Resource Board members, "HRB") through outside counsel (Mr. Doug Smith) and serve as neutral counsel to the adjudicating body. We were also informed that the HRB members themselves would not be made available to the AB. As I consider the goal of our Code of Ethics and Conduct, established by our City Charter, is to provide both an actual and a perception of transparency, this dual role and lack of access to key parties is difficult to come to terms with. As such, I am left with the notion that our powers as finders of fact have been curtailed somewhat needlessly.

I have followed up on this matter in particular, because as an adjudicating body a definitive part of our final decision was to bring specific areas of conflict and concern within disciplinary hearings being run by our city staff to the attention of the City Council. My vote, in fact, was predicated on my motion to present said report to the Council (see minutes of December 13, 2013). To date, for reasons mostly unknown to me, this action has not been taken despite assurances of such from the AB Chairman, Mr. Justin Scott-Coe. I will elaborate more as I walk you through the ethics hearing from my perspective. I strongly believe that failing to address these core issues renders the entire Code of Ethics and Conduct complaint process pointless, and wastes significant time on behalf of all parties involved.

Concerns:

- Limitation of Scope. As an adjudicating body our ability to request information was virtually non-existent. We could not require testimony, subpoena documents nor investigate issues outside of the strict scope outlined by the City Attorney. And yet, we were presented by the city with no justification for this being so. I find these constraints overly burdensome, particularly in light of HRB counsel (Mr. Smith) materially misrepresenting to the Council at the March 25, 2014, appeal hearing that Mr. Hunter had the opportunity to present all evidence. This statement was simply untrue. In fact, many of my reservations during the ethics hearings themselves centered around the somewhat arbitrary limitations put on Mr. Hunter concerning evidence he could present and his ability to provide testimony, either his or other witnesses.
- Training of the Human Resources Board. Of the misrepresentations made to the Council by Mr. Smith, this was the most egregious. There is simply no nice way of

stating this - he lied. Astonishingly, Mr. Smith told the Council the exact **opposite** of what we concluded. The adjudicating body clearly and unequivocally stated that as a body we were to make a presentation to the Council regarding proper training of boards and commissions, specifically chairmen, and the need for more transparent hearing procedures written in a way such that the average citizen would feel confident in the process and how to present evidence.

Mr. Smith sat in attendance at both ethics hearings as we quite clearly and repeatedly made these points. There was also significant concern over the lack of engagement by non-chair members of the HRB at Mr. Hunter's disciplinary hearing, and plain disregard for adherence to basic parliamentary procedure as evidenced in the video of this proceeding.

- Actions of the City Attorney. After viewing the video of the disciplinary hearing in question, and even taking a month-long recess to absorb its meaning, we as an AB concluded, clearly and without reservation, that we were extremely uncomfortable with the actions and demeanor of the City Attorney, Mr. Greg Priamos. However, we were informed by the City Attorney's office that this inappropriate behavior was out of the scope of our authority to review. Irrespective of such self-serving advice, our concerns and observations must be brought to the attention of the City Council:

1. The City Attorney was seated in the middle of Council chambers (directly next to HRB Chairman, Mr. Norman Powell) at the disciplinary hearing, and not to the side as seated during regular Council meetings. This provides the visual that the City Attorney was indeed running the meeting. It should be noted that Mr. Priamos can be seen whispering advice to the Chair out of microphone reception throughout various points in the video.
2. The City Attorney responds out of order, not waiting to be recognized by the Chair and without being asked for comment time after time. It is noticeable that his pro-city/anti-Mr. Hunter recommendations to the Chair are followed unswervingly and without debate by the HRB. In one instance, Mr. Priamos even recommends a pause in the proceedings **and leaves his seat before** the Chair acknowledges his request.
3. In a disturbing revelation made after the conclusion of Mr. Hunter's ethics complaint hearings, Mr. Scott-Coe admitted to the AB that he had met privately with City Attorney, Mr. Priamos, just prior to the meeting to discuss the hearing in general, and the limits on presentation of evidence and testimony. If the goal our Code of

Ethics and Conduct complaint process is full transparency, those instructions should have been made to the entire AB in an open forum. In fact, Mr. Priamos' involvement at all at that juncture, in light of his behavior at the disciplinary hearing is perplexing. Additionally, the rules of Ethics Hearings should be made public, and properly vetted as such.

4. At the first ethics hearing, held on November 15, 2013, the AB discovered that Mr. Hunter had provided the city with a detailed list of objections and motions concerning the ethics hearing protocols provided to him by the City Attorney's office, prior to the AB convening. Without delving into these individually, I found it unsettling that the AB was not made aware of the existence of this list until the onset of the hearing, leaving us unprepared to tackle the issues and without justification from the City Attorney's office regarding their merits.
5. As it is not clear who wrote the rules for Mr. Hunter's disciplinary hearing, it is unknown who made the decision for the HRB to deliberate in secret with the City Attorney at the conclusion of the presentation of the city's case. Following, the actions of the HRB taken in this private setting were not announced later to the public. As such the AB could not determine how or why the HRB made its findings or determinations.

It was the general feeling of the AB that certain city staff, including the City Attorney's office, might have been in violation of the Code of Ethics and Conduct throughout the disciplinary process. However, once again, this was ruled outside the scope of our review by what-might-be-considered a conflicted City Attorney's office. Of grave concern were the delays by the city in providing Mr. Hunter with notices and rules, as well as access to particular evidence to provide an adequate defense.

We sincerely question the duality of roles played within the City Attorney's office (as active advocate and neutral counsel to the HRB) during Mr. Hunter's disciplinary hearing. Although we were assured this is standard operating procedure, we find the practice debatable as to its fairness. Again, this matter was ruled outside of scope of our investigation.

In conclusion, the true and accurate findings of the AB were misrepresented to the City Council and the mandated presentation per our unanimously-carried motion was never presented. These factors were paramount to my final vote. I don't believe anyone was comfortable with what they saw transpiring on the video of Mr. Hunter's disciplinary hearing. It was one of the rare times I was actually embarrassed by our city's actions.

This is not how I envision a City committed to Arts and Innovation, as well as progressive visions of open and transparent governance, conducts itself. Our presentation absolutely should have been made prior the Council hearing the appeal of our decision carried forth by Mr. Hunter in order to have the Council fully educated.

Further, I am at a loss as to why the AB was not informed individually of the Council appeal hearing on this subject. If in attendance, I would have used the public comment period to rebuke the misleading statements made by the HRB attorney.

This letter is only a high level summary of this matter, provided in an effort to induce open dialog and independent investigation of the facts surrounding both Mr. Hunter's disciplinary and ethics hearings, as well as the nature of these proceedings in general.

If you have any questions or concerns please feel free to contact me at your convenience. At this point, the highest motivation should be to provoke meaningful change as to how the city conducts its business in these regards.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Keith Nelson', with a long horizontal flourish extending to the right.

Keith J. Nelson, Ph.D.
6411 Merlin Drive
Riverside, CA. 92506
(951) 398-1024
knelson@vistem.com

Barton, Karen

From: Kevin <kevindaw@aol.com>
Sent: Tuesday, June 24, 2014 9:16 AM
To: COB
Subject: On Priamos agenda item

Dear Supervisor,

I oppose hiring City Attorney Greg Priamos as county council. For years he has violated the city of Riverside charter. The charter requires council approval for hiring outside legal services. To get around this requirement, Priamos has spent tens of millions of dollars hiring outside legal verbally, without any contracts. He admits to this openly.

He also has abused his position to set city policy. As CA, he has told the council something wasn't legal, when it was. He has done this to set policy, as the council are not attorneys, able to challenge his position. It is not always clear as to his motivations. He took this position recently on a question of a moratorium. Later, it was quietly allowed to go forward.

I believe the city council is not happy with him and that is why he is looking for a new position. If you hire him before he is let go, you will not know the council's level of displeasure.

Kevin Dawson

Ward two, city of Riverside
First District, county of Riverside

Sent from iPad.

Sent from iPad.
Sent from iPad.

3-1
6/24/14

Riverside County Board of Supervisors
Request to Speak

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Raychele Sterling

Address: 17672 Fan Palm Ln.
(only if follow-up mail response requested)

City: Riverside ^{CA} ~~CA~~ Zip: 92503

Phone #: 951-343-2722

Date: 6-24-14 Agenda # 3.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

Support Oppose Neutral

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

Support Oppose Neutral

I give my 3 minutes to: _____

**Riverside County Board of Supervisors
Request to Speak**

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: AURORA Chaver

Address: 4234 HARRISON ★
(only if follow-up mail response requested)

City: Riverside ★ **Zip:** 92503

Phone #: 951 359-5657

Date: 6/24/14 **Agenda #** 3.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

Support **Oppose** **Neutral**

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

Support **Oppose** **Neutral**

I give my 3 minutes to: _____

Riverside County Board of Supervisors
Request to Speak

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: JASON HUNTER

Address: jehunter51@msn.com
(only if follow-up mail response requested)

City: RIVERSIDE Zip: 92506

Phone #: 202321 2630

Date: 6/24/14 Agenda # 3.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

Support Oppose Neutral

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

Support Oppose Neutral

I give my 3 minutes to: _____

**Riverside County Board of Supervisors
Request to Speak**

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: ERROL Koschewt²

Address: 4070 JACKSON Street
(only if follow-up mail response requested)

City: Riverside **Zip:** 92504

Phone #: 951(642)-7014

Date: _____ **Agenda #** 3-1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** **Oppose** _____ **Neutral**

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: _____

6 mins

**Riverside County Board of Supervisors
Request to Speak**

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Lehta Pepper

Address: _____
(only if follow-up mail response requested)

City: Riverside **Zip:** _____

Phone #: _____ *Re hiring Greg Priamos as Riv County Council*
Date: 6/24/2014 **Agenda #** 3.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** X ^{*Strongly*} **Oppose** _____ **Neutral**

Note: If you are here for an agenda item that is filed for "Appeal", please state separately your position on the appeal below:

_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: _____

Riverside County Board of Supervisors
Request to Speak

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Doris Wright 89

Address: 4167 Central Avenue
(only if follow-up mail response requested)

City: Riverside CA **Zip:** _____

Phone #: _____

Date: 6/24/2014 **Agenda #** 3.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** **Oppose** _____ **Neutral**

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: Letitia Pepper

Riverside County Board of Supervisors
Request to Speak

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Karen Doris Wright 62

Address: 4167 Central Avenue
(only if follow-up mail response requested)

City: Riverside CA Zip: _____

Phone #: 204 3252

Re hiring Greg
Priamos as Riv

Date: 6/24/2014 Agenda # 3.1 County Council

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ Support X STRONGLY Oppose _____ Neutral

as bad for Riverside County Residents
as I believe Priamos will not act in citizens

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below: best interest in some or
more cases.

_____ Support _____ Oppose _____ Neutral

I give my 3 minutes to: _____

**Riverside County Board of Supervisors
Request to Speak**

Submit request to Clerk of Board (right of podium),
Speakers are entitled to three (3) minutes, subject
to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: Britt Holmstrom

Address: _____
(only if follow-up mail response requested)

City: _____ **Zip:** _____

Phone #: _____

Date: Oct 27 ⁶⁻²⁴⁻¹⁴ **Agenda #** 3-1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** _____ **Oppose** _____ **Neutral**

Note: If you are here for an agenda item that is filed
for "Appeal", please state separately your position on
the appeal below:

_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: _____