



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

February 23, 2015

✓ Ms. Kyri McClellan  
[REDACTED]  
[REDACTED]

**RE: FPPC No. 13/469; Mark Buell, Phil Ginsburg, Kyri McClellan**

Dear Ms. McClellan:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act") found in Government Code Section 81000, and following. As you may be aware, the Commission opened an investigation into potential conflicts of interest involving San Francisco public officials and the America's Cup Organizing Committee. Specifically, we examined the circumstances surrounding your departure from city service, where you worked as a project manager with the San Francisco Office of Economic and Workforce Development, for a potential violation of the one year ban contained in the Government Code. The Commission has completed its investigation of the facts in this case, and has decided to close the case without further action.

Section 87406.3 of the Act prohibits certain local government agency employees, including local elected officials, chief administrative officers of counties, city managers, or general managers or chief administrators of special districts, from appearing before or communicating with, for compensation, his or her former local government agency for the purpose of influencing certain administrative or legislative action or influencing certain proceedings for a period of one year. In this case, you were not the type of local government employee that would have been subject to the provisions of the one year ban contained in the Government Code.

The Commission has completed a review of the forgoing allegations and closed this case without finding a violation.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act, so if you need forms or manuals, or guidance regarding your obligations, please call the Commission's Technical Assistance Division at 1-866-275-3772. Please also visit our website at [www.fppc.ca.gov](http://www.fppc.ca.gov).

Sincerely,

A black rectangular redaction box covering the signature of Zachary W. Norton.

Zachary W. Norton  
Commission Counsel  
Enforcement Division