

1 BRYN KIRVIN, Executive Director
2 City of San Diego Ethics Commission
3 451 A Street, Suite 620
4 San Diego, CA 92101
5 Telephone: (619) 533-3476
6 Petitioner

7 **BEFORE THE CITY OF SAN DIEGO**
8 **ETHICS COMMISSION**

9 In re the Matter of:) Case No.: 2024-27
10)
11 NORWOOD DEVELOPMENT) **STIPULATION, DECISION AND**
12 STRATEGIES,) **ORDER**
13)
14 Respondent.)
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29 **STIPULATION**

30 **THE PARTIES STIPULATE:**

31 1. Petitioner Bryn Kirvin is the Executive Director of the City of San Diego Ethics
32 Commission (Commission). The Commission is charged with administering,
33 implementing, and enforcing local governmental ethics laws in the San Diego Municipal
34 Code (SDMC) relating to, among other things, the City of San Diego Municipal Lobbying
35 Ordinance, SDMC section 27.4001 *et seq.*

36 2. At all times mentioned herein, Norwood Development Strategies (Respondent)
37 was an organization lobbyist registered with the Office of the City Clerk. Deborah Ruane
38 (Ruane) was the Respondent's owner and registered lobbyist.

39 3. This Stipulation will be submitted for the Commission's consideration at its
40 next meeting. The agreements outlined in this Stipulation are contingent upon the
41 Commission's approval of the Stipulation and the accompanying Decision and Order.

4. This Stipulation resolves all factual and legal issues raised by the Commission without needing an administrative hearing to determine the Respondent's liability.

5. Respondent understands and knowingly and voluntarily waives any procedural rights under the SDMC including, but not limited to: a determination of probable cause, the issuance and receipt of an administrative complaint, the right to appear personally in any administrative hearing held in this matter, the right to confront and cross-examine witnesses testifying at the hearing, the right to subpoena witnesses to testify at the hearing, and the right to have the Commission or other impartial hearing officer hear this matter.

6. Respondent agrees that the terms of this Stipulation constitute compliance with SDMC section 26.0450 in that the Stipulation includes a recitation of facts, a reference to each violation, and an order.

7. Respondent agrees to hold the City of San Diego and the Commission harmless from any claims or damages resulting from the Commission's investigation, this stipulated agreement, or any matter reasonably related to it.

8. Respondent acknowledges that this Stipulation is not binding upon any other law enforcement or government agency and does not preclude the Commission from referring this matter to, cooperating with, or assisting any other law enforcement or government agency regarding this or any other related matter.

9. The parties agree that if the Commission refuses to accept this Stipulation, it shall become null and void. Respondent further agrees that if the Commission rejects the Stipulation and a full evidentiary hearing becomes necessary, no member of the Commission or its staff will be disqualified because of their prior consideration of this Stipulation.

Summary of Law and Facts

10. Organization lobbyists registered with the Office of the City Clerk are required to file quarterly disclosure reports no later than the last day of the months of April, July,

October, and January, covering the preceding calendar quarter. (SDMC §§ 27.4015 and 27.4016). These disclosure reports provide transparency by helping the public understand who is attempting to influence municipal decisions by requiring lobbyists to report their activities, clients, and income.

11. On January 22, 2024, Respondent registered with the Office of the City Clerk as an organization lobbyist for the 2024 calendar year.

12. On April 30, 2024, Respondent timely filed a disclosure report for the first quarter of 2024.

13. Respondent failed to file a disclosure report for the second quarter of 2024 until June 1, 2026, 671 days after its original due date of July 31, 2024.

14. Respondent failed to file a disclosure report for the third quarter of 2024 until June 1, 2026, 579 days after its original due date on October 31, 2024.

15. Respondent failed to file a disclosure report for the fourth quarter of 2024 until June 1, 2026, 487 days after its original due date of January 31, 2025.

Counts

Counts 1 to 3 – Violations of SDMC sections 27.4015 and 27.4016

16. Respondent violated SDMC sections 27.4015 and 27.4016 by failing to timely file quarterly lobbyist reports as outlined in paragraphs 13 through 15.

Factors in Mitigation

17. During the relevant time, Ruane was experiencing personal hardships and was in the process of closing the business. Ruane noted that she has no plans to engage in any lobbying activities in the future.

18. Respondent did not have any lobbying contacts to report in the second, third, or the fourth quarter of 2024.

19. Respondent completed the reports during an interview on June 1, 2026, and the reports were forwarded by staff to the City Clerk's office for filing.

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Factors in Aggravation

20. Respondent was notified over 20 times via a combination of email, postal service, and phone by the Office of the City Clerk and Commission staff that the filings were late and needed to be filed.

21. Ruane was subpoenaed to appear for an interview, at which time the forms were completed.

Conclusion

22. Respondent agrees to take necessary and prudent precautions to ensure compliance with all provisions of the City's Lobbying Ordinance in the future.

23. Respondent acknowledges that the Commission may impose increased fines concerning future violations of the City's Lobbying Ordinance.

24. Respondent agrees to pay a fine of \$750 for violations of SDMC sections 27.4015 and 27.4016. This amount must be paid by check or money order made payable to the *City Treasurer*. The check or money order should be mailed or delivered to the Ethics Commission office on or before July 10, 2026. The payment will be held pending Commission approval of this Stipulation and execution of the Decision and Order below.

DATED: _____	[REDACTED] _____ Bryn Kirvin, Petitioner San Diego Ethics Commission
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DATED: _____	[REDACTED} _____ Deborah Ruane, Owner Norwood Development Strategies
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DECISION AND ORDER

The Ethics Commission considered the above Stipulation at its meeting on August 13, 2026. The Ethics Commission hereby approves the Stipulation and orders that the Respondent pay a fine in the amount of \$750.

DATED: _____ [REDACTED]
Jimmie Slack, Chair
San Diego Ethics Commission