

Rafael
Castellanos
for
City Attorney

October 1, 2015

Ms. Stacey Fulhorst, Executive Director
City of San Diego Ethics Commission
1010 Second Avenue, Suite 1530
San Diego, CA 92101

Dear Ms. Fulhorst:

I am writing to formally request that the City of San Diego Ethics Commission recuse itself from the 2016 campaign for San Diego City Attorney. I am aware that you, personally, have recused yourself from the details of the campaign which highlights to me the inherent problems associated with the City of San Diego Ethics Commission acting in a fair and balanced way as it pertains to this race.

You are well aware that Mr. Gil Cabrera is a candidate for City Attorney and that he served on the Board of the Commission for an extended period of time and that he also served as a past Chairman. In addition, Mr. Cabrera has been retained by the Commission as an outside consultant from time to time. Many of the staff members who worked under Mr. Cabrera are still with the Commission.

In order to eliminate even the possibility of unfairness and bias in the workings of the Commission it is imperative to remove the Commission from any oversight of the City Attorney's campaign. The FPPC can easily step in and provide the necessary enforcement of local election laws. All campaigns would still be subject to the same reporting and campaign finance laws. However, the enforcement of those laws would be administered by another agency that is not subject to any conflict of interest or bias, whether actual, potential, or inadvertent.

I would appreciate your prompt review of this request and an affirmative decision to transfer all enforcement of local election laws in this campaign to the FPPC.

Thank you.



Rafael Castellanos