

DECLARATION OF JOSEPH DELLA SANTINA

I, Joseph Della Santina, hereby declare as follows:

1. I am a licensed attorney and have been a continuous member in good standing of the State Bar of California since 1997. My business address is located at 2704 Saint James Road in Belmont, California (94002). I am aware of the contents of this Declaration and if called to testify upon them I would do so competently under oath.
2. I received a document submitted to the City and County of San Francisco ("CCSF") purporting to be signatures necessary to appeal the CCSF Planning Commission's December 12, 2019 unanimously approval of Condition Use Application (2018-01554-CUA)("Application").
3. I reviewed CCSF ordinances with regard to the signature requirement to properly appeal matters approved by the CCSF Planning Commission. I likewise conducted an investigation of the requirement that deeded owners of property must sign such an appeal and the calculation of property square footage to trigger an appeal.
4. I summarized my findings with regard to the actual owner's square footage signing onto the appeal paperwork in the attached Microsoft Excel spreadsheet and am provided copies of the actual deeds I referenced to determine whether the actual owner of the properties stated on the appeal in fact signed the appeal.
5. By my calculations the appeal lacks sufficient signature's to override the Planning Commission's decision and the appeal should not go forward on procedural grounds.
6. I have raised this issue with the clerk of the Board of Supervisors and my client has likewise raised this issue and we have requested that the matter not be reheard "De Novo" by the CCSF Board of Supervisors and the Application should be remanded to the CCSF Planning Department for implementation of the Planning Commission's decision.

Executed under penalty of perjury according to the laws of the State of California at Belmont, California this 18th day of June 2020.

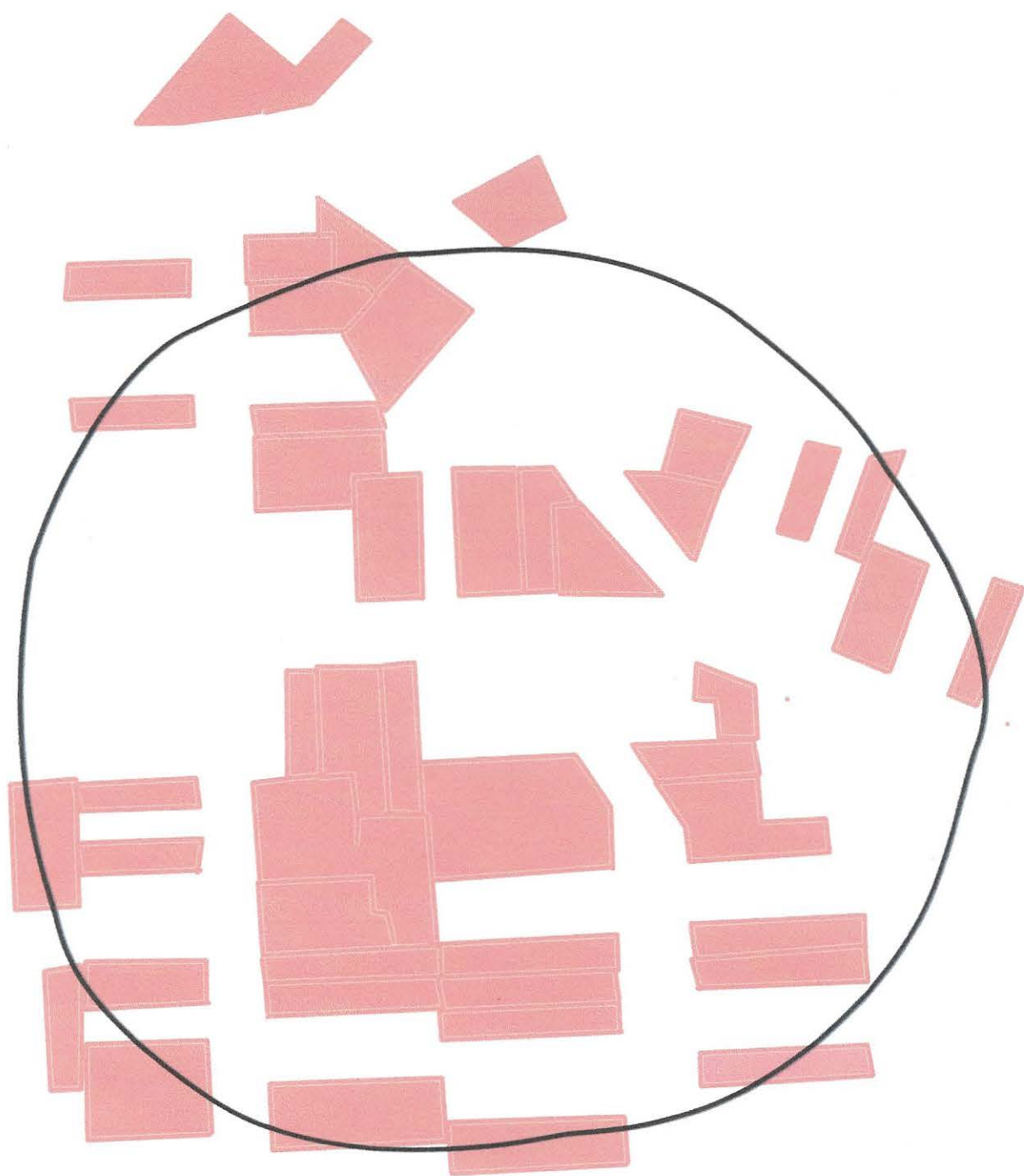


Exhibit	Address	Block	Lot	Deeded Owner(s)	Subscribed	Sq.Ft.	% Signing	Effective	
	Stillings								
1	2 Stillings	6734	8	James J. Hanratty and Jacklyn A. Hanratty	Jacklyn	3645	50	1823	*
2	16 Stillings	6734	9	Jacqueline Poggi Trust 8/26/19	No	2725	0	0	
3	20 Stillings	6734	10	Louise Swig	Yes	2495	100	2495	Swig Signed this
4	24 Stillings	6734	11	Anne J. Laskey Living Trust	No	1250	0	0	
	24A Stillings	6734	11	Anne J. Laskey Living Trust	No	1250	0	0	
5	30 Stillings	6734	12	Not Submitted	No	2500	0	0	
6	46 Stillings	6734	23	46 Stillings Properties, LLC	No	4996	0	0	
7	49 Stillings	6763	31	The Judith Tick and Steven Ganz Revocable Trust 6/11/14	No	2886	0	0	
8	51 Stillings	6763	30	Cristina D. Dobleman	Yes	2664	100	2664	
9	53 Stillings	6763	38	Paul Cole and Alexis Sturdy	Alexis	2094	50	1047	
10	57 Stillings	6763	37	Carmen Vega	Yes	2094	100	2094	
11	61 Stillings	6763	35	Not Submitted - Scott Sarra	No	2094	0	0	
12	70 Stillings	6734	15	Not Submitted - Nancy Travisano	No	3750	0	0	
13	100 Stillings	3059	10	Not Submitted - Stout Trust Unnamed	No	2774	0	0	
14	115 Stillings	3060	1E	Not Submitted - Richard L. Newman Living Trust 12/16/2004	No	2042	0	0	
15	118 Stillings	3033	21	Not Submitted - James and Alba Chase Trust 12/12/11	No	2495	0	0	
16	119 Stillings	3060	1D	Not Submitted	No	2121	0	0	
17	122 Stillings	3033	20	Not Submitted - Sayed Mustafa Habib	No	2500	0	0	
	Martha								
18	33 Martha	6762	39	Not Submitted - Andrew Bowles and Stephanie M. Bowles	No	1900	0	0	
19	37 Martha	6762	38	Not Submitted - Survivors Trust O'Neil Family Trust 9/18/90	No	2663	0	0	
20	41 Martha	6762	35	Not Submitted - Irene J. Moore Revocable Trust 3/27/2006	No	2535	0	0	
21	45 Martha	6762	34	Not Submitted - Trost Family Trust of 1994	No	3449	0	0	
22	49 Martha	6762	33	Not Submitted	No	2487	0	0	
23	50 Martha	6735	14	CCSF (2522)		0			
24	51 Martha	6762	30A	Frank Chieng-Chun & Barbara Le Beau Chun	Frank	1812	50	906	
25	52 Martha	6735	15	The Getz/Lopato Revicable Trust 9/29/06	No	2504	0	0	
26	53 Martha	6762	32	Not Submitted - George H. 2018 Main Houghtista Revivable Trust	No	2157	0	0	
27	54 Martha	6735	16	Not Submitted - Mary K. Cabot t2002 Revicable Trust	No	2487	0	0	
28	57 Martha	6762	31	Not Submitted Hsin Shu (50%); Justin Luo (17%); and Justin Lee 33%	No	2408	0	0	
29	58 Martha	6735	17	Not Submitted - Joshua Wykes & Lovina Wykes	No	2463	0	0	
30	62 Martha	6735	18	Durighello Revocable Trust 7/25/94	No	2217	0	0	
31	66 Martha	6735	19	Unita Fay Mitchell & Sharon Mayweather	Unita	2199	50	1100	
32	68 Martha	6735	45	Not Submitted - Charlolett; Natalie and Edward Ely	No	1799	0	0	
33	70 Martha	6735	46	Not Submitted - Ralph E. Killen	No	1799	0	0	
34	72 Martha	6735	62	Not Submitted - O'Neill Family Trust 9/18/90	No	1787	0	0	
35	76 Martha	6735	50	Not Submitted - Cynthia Susan Goldfield	No	3417	0	0	
	76A Martha	6735	50	Not Submitted	No				
36	88 Martha	6735	25	Thomas X. Christian	Yes	2622	100	2622	
37	89 Martha	6734	7	Not Submitted - Michael S. Lee & Amy J. Bricker	No	2927	0	0	

38	95 Martha	6734	6	Not Submitted - Scott C. Kogan Revocable Trust 11/7/08	No	2709	0	0	
39	98 Martha	6735	26	* McSween - No Signature/Document Produced	No	3410	0	0	
	<u>Baden</u>								
40	433 Baden	6762	5	Not Submitted - Peter F. Rojas & Jill Fehrenbacher	No	3375	0	0	
41	435 Baden	6762	4	Not Submitted - The Liddrey Trust 12/20/93	No	3371	0	0	
42	445 Baden	6762	3	Not Submitted - O'Leary Trust 2/15/90	No	3375	0	0	
43	451 Baden	6762	2	Not Submitted	No	2750	0	0	
	<u>Mangels</u>								
44	180 Mangels	6763	15C	Not Submitted - Greenough Hasselmen Trust 11/18/2013	No	3445	0	0	
	<u>Congo</u>								
45	508 Congo	6763	16	Not Submitted	No	2504	0	0	
NEW	511 Congo	6764	14	Howard Rosenfield		2260			
46	514 Congo	6763	17	Stuart Pilorz & Susan Ostermann	Both	3400	100	3400	
47	520 Congo	6763	15	Gary N. Wong & Flora N. Wong Trust 1991	No	3400	0	0	
48	521 Congo	6764	13	Thomas W. Trent & Laurel I. Schaefer-Trent	Both	2260	100	2260	
49	527 Congo	6764	12	Roland Luistro & Herbert Ramirez	Herbert	2265	50	1133	
50	530 Congo	6763	19	Not Submitted	No	6800	0	0	
51	538 Congo	6763	21	Paul R. Cort & Elizabeth Murdock	Both	3400	100	3400	Is there a new Deed?
52	541 Congo	6764	21	Jason A. Keel & Neeru Gupta	Both	3446	100	2270	
53	544 Congo	6763	22	Gregory Ridenour & Deborah May Trust 3/13/15	No	2500	0	0	
54	550 Congo	6763	42	Jennifer M. Lucero	No	2500	0	0	
55	556 Congo	6763	39	James J. Vogt Living Trust Living Trust 1/18/16	No	2578	0	0	
56	557 Congo	6764	7	Not Submitted	No	2278	0	0	
57	561 Congo	6764	6	* - Koenigsberg * - No Proof of Ownership Produced	No	2282	0	0	
58	566 Congo	6763	43	The Blue Pearl Trust 10/9/2013	No	7023	0	0	
59	569 Congo	6764	5	Not Submitted - Maryanne Huey and Gregory Huey	No	2283	0	0	
60	574 Congo	6763	41	Theodore D. Harris & Faye L. Harris	Both	3524	100	3524	
61	575 Congo	6764	4	Jane C. Mangini	Yes	2286	100	2286	
62	579 Congo	6764	3	Not Submitted	No	2286	0	0	
63	583 Congo	6764	2	Not Submitted	No	2293	0	0	
64	589 Congo	6764	1	Not Submitted	No	2755	0	0	
65	603 Congo	3059	9	Not Submitted - V - Reneé Yates 2009 Trust	No	2304	0	0	
66	607 Congo	3059	8	Not Submitted - Reneé Yates 2009 Trust	No	2308	0	0	
67	616 Congo	6734	16	Not Submitted - Thomas J. Poye	No	1873	0	0	
68	620 Congo	6734	17	James E. Skeen Jr. 1998 Revocable Trust 10/23/14 (70%)	No	1873	0	0	
	620 Congo	6734	17	Kenneth C. Avery 1998 Revocable Trust 2/12/14 (30%)	No		0	0	
69	624 Congo	6734	18	Chang Liu & Wenwei Zhao	Both	3400	100	3400	

70	627 Congo	3059	7	Not Submitted - Jean Michele Schael & Kathryn Podgonoff Revocable Inter-Vivos Trust	No	2308	0	0	
71	628 Congo	6734	28	May 9 1996 Revocable Trust	No	2482	0	0	Defective Deed Noted
72	631 Congo	3059	6	Not Submitted - Justin Williams & Meija Jacobs	No	2313	0	0	
76	639 Congo	3059	5	* Newburn Trust Power of Appointment Trust	No	2317	0	0	
77	645 Congo	3059	4	Not Submitted	No	3542	0	0	
78	652 Congo	6734	29	Ronal M. Gallego Living Trust 3/13/2003	No	3240	0	0	
79	655 Congo	3059	3	Not Submitted - Chang-Chien Liaw Family Trust 2/8/19	No	3484	0	0	
80	663 Congo	3059	2	The Pouchard Trust 8/31/16	No	2328	0	0	
81	669 Congo	3059	1A	Newburn Trust Power of Appointment Trust	No	2332	0	0	
82	680 Congo	6734	31	Chance Elliot & Lisa McCahon	Lisa	2509	50	1255	
NEW	701 Congo	6706	62	Chris Garvey		4703			
83	710 Congo	6734	33	Allan B. Pleanor & Ruth E. Pleanor Revocable Trust 4/16/15	No	2439	0	0	
84	720 Congo	6734	2	Jeffrey C. Laffranchini 2015 Trust 7/15/15; Robert E. Kates 1997 Trust	No	3075	0	0	Defective Deed Noted
NEW	729 Congo	6706	60	Brian Curry		3074			
85	730 Congo	6734	3	Revocable Trust 12/4/98 (Adrienne Lacou)	No	2465	0	0	Defective Deed Noted
NEW	732 Congo			Adrienne Lacou - there is no 732 Congo on the Map! Is it 736??					
86	736 Congo	6734	4	Not Submitted - V	No	2770	0	0	
87	749 Congo	6706	44	Marry Ellen Muckerman & Michael Youngblood	Michael	2829	50	1415	
88	750 Congo	6734	5	Not Submitted - Steven L. Eprin & Claire J. Bunton	No	2809	0	0	
89	775 Congo	6706	41	Not Submitted - Valeskie Roth Revocable Trust 1/10/2020	No	2866	0	0	
90	801 Congo	6706	42	Kathleen M. Garvey & Christopher Garvey	Christopher	2509	50	1250	
91	810 Congo	6735	27	Kammerud Family Trust 3/26/15	No	2735	0	0	
92	818 Congo	6735	49	Not Submitted - Rettig Family Trust 2/21/97	No	3371	0	0	
93	822 Congo	6735	63	Mar & Choy Family Trust 3/2/15	No	1810	0	0	
94	826 Congo	6735	47	Not Submitted - Caesar Morales and Elba Morales	No	1890	0	0	
95	830 Congo	6735	48	The Miriam A. Moss Revocable Trust 3/26/2009	No	2151	0	0	
96	834 Congo	6735	28	Not Submitted - Mark C. Davis & Lisa H. Kluber	No	2186	0	0	
	Melrose								
97	15 Melrose	6764	1	Pryor Family Trust Agreement 12/3/2003	No	2596	0	0	
98	16 Melrose	3060	2	James M. Ramsey & Vicki Chiang	Vicki	2596	50	1298	
99	20 Melrose	3060	2A	Julie L. Goot	Yes	2500	100	2500	
	Bosworth								
100	1173 Bosworth	6735	29	Not Submitted	No	2482	0	0	
101	1177 Bosworth	6735	28	Not Submitted	No	2548	0	0	
	Nordhoff								
124	8 Nordhoff	6762	17	Not Submitted	No	3384	0	0	
102	11 Nordhoff	6763	15	Jin W. Park & Jeong W. Park	Jin	5074	50	2537	

103	14 Nordhoff	6762	18	Not Submitted	No	3375	0	0	
104	21 Nordhoff	6763	14	Not Submitted	No	5061	0	0	
105	22 Nordhoff	6762	19	* - No Proof of Ownership Produced	No	3375	0	0	
106	27 Nordhoff	6763	13	Not Submitted - Peter M. Chiu & Albert K. Tal	No	3371	0	0	
107	28 Nordhoff	6762	20	Not Submitted - Gerry Filby	No	3371	0	0	
108	33 Nordhoff	6763	12	Uprichard Tatum 2013 Trust 11/26/13	No	3375	0	0	
109	34 Nordhoff	6762	21	Not Submitted - Michael Calahan & Margarite Calahan	No	3371	0	0	
110	38 Nordhoff	6762	22	* - No Proof of Ownership Produced	No	3375	0	0	
111	39 Nordhoff	6763	11	2019 Kelli & Paul Stock Revocable Trust 5/17/19	No	3375	0	0	
112	43 Nordhoff	6763	10	Rosenbleuth Family Living Trust	No	3371	0	0	
113	44 Nordhoff	6762	23	Coene Revocable Trust 2/4/19	No	3371	0	0	
114	49 Nordhoff	6763	9	Not Submitted - Marcu Deane Jones & Betty Jane Jones Revocable Trust 11/29/05	No	3371	0	0	
115	56 Nordhoff	6762	24	Not Submitted - Vanderheiden Family Trust 1/5/05	No	3371	0	0	
116	57 Nordhoff	6763	8	Not Submitted - Nancy J. Murray Trust 2016 2/1/2016	No	3371	0	0	
117	62 Nordhoff	6762	25	Not Submitted - Kimberly D. Osmer 206 Trust 1/25/2006	No	3375	0	0	
118	64 Nordhoff	6762	26	Andrew & Claire Droog Living Trust 8/1/19	No	2750	0	0	
119	65 Nordhoff	6763	7	Larry M. Ketelaar Revocable Trust 6/10/2009	No	5061	0	0	
120	66 Nordhoff	6762	27	Timothy M. Polishook & Jennifer L. Polishook	Both	2465	100	2465	
121	69 Nordhoff	6763	44	The Bashir A. Abdullah Revocable Trust 5/24/04	No	6466	0	0	
122	80 Nordhoff	6762	28	Carolyn J. Fleg	Yes	2696	100	2696	
123	86 Nordhoff	6762	29	Not Submitted	No	2696	0	0	
					Total	356653		51840	
					20%	71330.6			
					Difference	19490.6			
					Actual Percentage	0.14535			





0% Signed 50% Signed 100% Signed