

1 grassroots community organization, Save Del Cerro, and opposition to the All Peoples Church Project,
2 for which she is the lobbyist. I submitted a complaint detailing my suspicions to the City Attorney's
3 Office and requested that it investigate. Around the same time, I submitted my Request in order to
4 investigate my suspicions further.

5 5. I had multiple objectives when making this request. Among them was my desire to see
6 whether my complaint would be communicated to Ms. Escobar-Eck behind the scenes or through a
7 formal investigation, by whom, and how quickly; and my desire to see whether the City would actually
8 produce evidence of such communications. For example, would my complaint be communicated
9 through formal investigative channels, or would one of Ms. Escobar-Eck's friends and/or former co-
10 workers forward the complaint to her outside the formal-investigation-channel. The undisclosed e-mail
11 in this case provided me with answers to that question.

12 6. Furthermore, obtaining that chain of communication to Ms. Escobar-Eck and
13 understanding how the City would try to keep it hidden from me has provided valuable information to
14 my community group as we work to oppose a major non-residential development project in a residential
15 neighborhood that Ms. Escobar-Eck is processing at the City as the developer's lobbyist and consultant.
16 Knowing how the City's staff communicates with Ms. Escobar-Eck has influenced our strategy for
17 communicating with City officials for the better.

18 7. The community opponents to Ms. Escobar-Eck's client's project and I used the
19 information revealed through this lawsuit as part of our strategy and talking points with members of the
20 San Diego City Council. On January 9, 2024, the City Council voted to deny that project based on the
21 community's opposition. Being able to explain how the City's staff gave preferential treatment to Ms.
22 Escobar-Eck helped to make our opposition even stronger.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct.

25 Date: January 10, 2024.

Joshua Billauer

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