

**NOTICE TO BOARD OF SUPERVISORS OF APPEAL  
FROM ACTION OF THE CITY PLANNING COMMISSION**

Notice is hereby given of an appeal to the Board of Supervisors from the following action of the City Planning Commission.

The property is located at 524 - 526 Vallejo St San Francisco, CA 94133.

December 4, 2025

\_\_\_\_\_  
Date of City Planning Commission Action  
(Attach a Copy of Planning Commission's Decision)

January 5, 2026

\_\_\_\_\_  
Appeal Filing Date

\_\_\_\_\_ The Planning Commission disapproved in whole or in part an application for reclassification of property, Case No. \_\_\_\_\_.

\_\_\_\_\_ The Planning Commission disapproved in whole or in part an application for establishment, abolition or modification of a set-back line, Case No. \_\_\_\_\_.

\_\_\_\_\_ The Planning Commission approved in whole or in part an application for conditional use authorization, Case No. \_\_\_\_\_.



\_\_\_\_\_ The Planning Commission disapproved in whole or in part an application for conditional use authorization, Case No. \_\_\_\_\_.

2024-011561CUA

Statement of Appeal:

- a) Set forth the part(s) of the decision the appeal is taken from:

See Notice of Appeal (attached)

- b) Set forth the reasons in support of your appeal:

See EXHIBITS A - I (attached)

Person to Whom  
Notices Shall Be Mailed

Name and Address of Person Filing Appeal:

Katelin Holloway

Katelin Holloway

\_\_\_\_\_  
Name

\_\_\_\_\_  
Name

524 Vallejo Street

524 Vallejo Street

San Francisco, CA 94133

San Francisco, CA 94133

\_\_\_\_\_  
Address

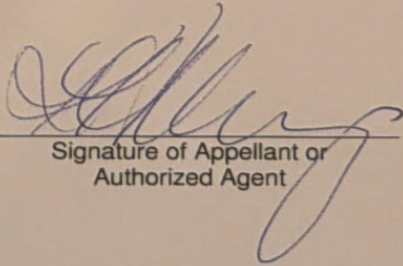
\_\_\_\_\_  
Address

415-828-7771

415-828-7771

\_\_\_\_\_  
Telephone Number

\_\_\_\_\_  
Telephone Number

  
\_\_\_\_\_  
Signature of Appellant or  
Authorized Agent

# Notice of Appeal of Planning Commission Decision

## Conditional Use Authorization

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**To:**

Clerk of the Board of Supervisors  
City and County of San Francisco  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

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### 1. APPELLANT INFORMATION

**Appellants:**

Katelin Holloway and Ben Ramirez  
524 Vallejo Street  
San Francisco, CA 94133  
415-828-7771 / 415-828-7772  
[katelin.holloway@gmail.com](mailto:katelin.holloway@gmail.com) / [ben.ramirez@gmail.com](mailto:ben.ramirez@gmail.com)

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### 2. SUBJECT PROPERTY

**Subject Property Address:**

524 Vallejo Street  
San Francisco, CA 94133

**Assessor's Block/Lot:**

0132/009

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### 3. PLANNING COMMISSION ACTION BEING APPEALED

**Planning Commission Case No.:** 2024-011561CUA

**Date of Commission Action:** December 4, 2025

**Decision Being Appealed:**

The Planning Commission's deemed denial of the Conditional Use Authorization for 524 Vallejo Street, resulting from a 3–3 split vote. Please see page 2 of Exhibit B for the hearing minutes.

Per the Planning Commission's Rules and Regulations:  
<https://sfplanning.org/resource/rules-and-regulations-san-francisco-planning-commission>, the 3-3 vote constitutes a denial.

See the specific language below:

*"Section 6. Voting.*

*a. Procedural Matters. Pursuant to Charter Section 4.104, with respect to matters of procedure the Commission may act by the affirmative vote of a majority of the members present, so long as the members present constitute a quorum.*

*b. Except as provided in subsection (a)" above, every Official Act taken by the Commission, including, but not limited to, those based on its jurisdiction derived from the Planning Code, Chapter 31 of the Administrative Code, the Subdivision Code and Discretionary Review Powers of the Commission, may be by "Motion" or "Resolution" adopted by a majority vote of all members of the Commission (four (4) votes). All members present shall vote for or against each question brought to a vote unless a member is excused from voting by a conflict of interest or a motion adopted by a majority of the members present.*

*A motion that receives less than four votes is a failed motion resulting in disapproval of the action requested to be taken by the Commission unless a substitute motion for a continuance or other action is adopted. (For example: a request for Conditional Use requires four votes to approve; failure to receive the four votes results in denial of the conditional use. A request for Discretionary Review requires four votes to take discretionary review and modify the project; failure to receive four votes results in approval of the proposed project without modification. Planning Code sets forth the requirements for Commission determinations regarding Planning Code amendments. Planning Code Section 340(d) sets forth the requirements for Commission determinations regarding General Plan amendments.)"*

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#### **4. BASIS FOR APPEAL**

Appellants hereby respectfully appeal the Planning Commission's action on the following grounds, including but not limited to:

1. The decision is **not supported by substantial evidence** in the record;
  2. The Planning Code and associated policies regarding unit mergers were **misapplied to the unique facts of this case**;
  3. The Commission failed to adequately consider the **uncontroverted evidence** demonstrating the as-built condition of the subject property and its long-standing use as a single dwelling unit for nearly a decade;
  4. The decision imposes **unreasonable and disproportionate hardship** on the Appellants for circumstances created by a prior developer;
  5. The proposed project **advances the City's housing, equity, and anti-displacement goals** by adding a new rent-controlled unit while minimizing neighborhood disruption;
  6. Additional grounds are set forth in the attached **Statement of Facts and Supporting Materials**.
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## 5. STATEMENT OF FACTS

*(Attached as Exhibit A)*

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## 6. EXHIBITS

- **Exhibit A:** Statement of Facts
- **Exhibit B:** Planning Commission Hearing Record and De Facto Denial
- **Exhibit C:** Photographic and MLS Records Demonstrating Long-Standing As-Built Condition
- **Exhibit D:** Architectural Evidence Demonstrating Material Divergence Between Approved Plans and As-Built Condition
- **Exhibit E:** Timeline of Property History
- **Exhibit F:** Planning Staff and Commission Acknowledgments Demonstrating Density Nonconformity, Long-Standing Vacancy, Feasibility Constraints, and the Need for a Proportional Resolution
- **Exhibit G:** Neighborhood Support and Community Input
- **Exhibit H:** Statement of Community Commitment, Public Contribution, and Civic Investment
- **Exhibit I:** Additional Supporting Materials

*Appellants reserve the right to supplement the record with subsequently issued Planning Department documents, including any Notice of Decision or adopted motion.*

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This Notice of Appeal is submitted in good faith and in accordance with the applicable provisions of the San Francisco Planning Code and Board of Supervisors appeal procedures.

## 7. SIGNATURES

We hereby appeal the Planning Commission's action regarding the above-referenced case.

Katelin Holloway

Date

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Ben Ramirez

Date

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## 5. STATEMENT OF FACTS

(Attached as Exhibit A)

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## 6. EXHIBITS

- **Exhibit A:** Statement of Facts
- **Exhibit B:** Planning Commission Hearing Record and De Facto Denial
- **Exhibit C:** Photographic and MLS Records Demonstrating Long-Standing As-Built Condition
- **Exhibit D:** Architectural Evidence Demonstrating Material Divergence Between Approved Plans and As-Built Condition
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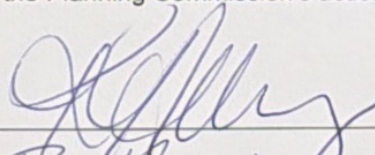
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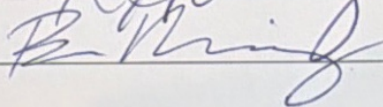
Katelin Holloway



Date

12/22/25

Ben Ramirez



Date

12/22/25

# EXHIBIT A

## Statement of Facts & Summary

524 Vallejo Street – Conditional Use Authorization Appeal

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### I. Introduction

This appeal arises from a long-standing discrepancy between the City's records and the as-built, long-standing use of the property located at 524 Vallejo Street ("the Property"). Appellants Katelin Holloway and Ben Ramirez are the current owner-occupants of the Property and have acted at all times in good faith, transparently, and in collaboration with City agencies to resolve a problem they did not create.

Rather than litigate, delay, or leave the discrepancy unresolved, Appellants have proposed a solution that adds real housing, creates a new rent-controlled unit, minimizes neighborhood disruption, and aligns with San Francisco's housing, equity, and anti-displacement goals.

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### II. Historical Use of the Property and Record Inconsistencies

Historically, 524 Vallejo Street functioned as a **two-unit residential building**, as reflected in City records prior to redevelopment by a subsequent owner. At some point prior to that redevelopment — the precise timing of which is unclear — **two additional dwelling spaces were constructed without legal authorization**, resulting in periods during which the building contained four residential spaces, only two of which were legally recognized.

At the time the prior developer acquired the Property in **2010**, three of the four residential spaces were reportedly occupied and one was unoccupied.

Following his acquisition of the Property, the developer entered into **buyout agreements with the existing tenants**, reportedly in the amount of approximately \$35,000 per unit, resolving those tenancies. These actions were undertaken by the developer, were resolved at the time, and occurred more than a decade before Appellants' ownership. Appellants were not involved in, aware of, or connected to these events or the former tenants.

After the buyouts, the developer sought and obtained approvals to **legalize the two additional units**, resulting in approved plans for a four-unit building. However, those plans were **never constructed**. Instead, during redevelopment, the developer:

- removed one of the previously legal units;
- failed to construct the two additional units authorized by the plans; and
- remodeled the building into a single-family residence with one continuous layout and one kitchen.

In **2016**, the Department of Building Inspection issued a **Certificate of Final Completion** for the as-built structure. By the time the Property was sold in **2017**, it existed, was MLS-marketed, lender-inspected, and occupied as a single-family home — the same condition in which it was later purchased by Appellants in **2021** and remains today.

Complicating this history further, the City's own records regarding the Property have been **internally inconsistent over time**. Depending on the department and document, the Property has been described variously as a single-family residence, a two-unit building, a three-unit building, and a four-unit building. These inconsistencies span decades and multiple agencies.

As a result, it has taken Appellants, their legal counsel, and their architectural team more than three years of diligent effort to reconstruct the Property's true history and reconcile conflicting records. This complexity was not of Appellants' making and underscores the difficulty faced by any homeowner attempting to resolve the issue transparently and in good faith.

Thus, while the Property experienced periods of informal or unauthorized occupancy in the distant past, the only units that were ever **legally recognized prior to redevelopment were two units**, and the four-unit configuration approved during redevelopment was **never built, never occupied, and never added to the City's housing stock**.

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### III. Appellants' Purchase of the Property and Reasonable Reliance

Appellants purchased the Property in 2021 as first-time homeowners after more than two decades of living and working in San Francisco. The Property was marketed through MLS — including in both the **2017 and 2021 listings** — and functioned in practice as a single-family residence, despite being identified in certain records as a multi-unit building that “lived as” a single-family home.

The prior owners disclosed that the Property carried a multi-unit designation; however, nothing in the marketing materials, inspections, or physical configuration of the building suggested that the City maintained approved plans for a four-unit building that materially diverged from the as-built condition. Nor was it apparent that compliance with those plans would require reconstructing a building configuration that had never existed in physical form.

At the time of purchase, the Property contained:

- a single continuous layout,
- one kitchen,
- unified internal circulation, and
- no constructed separation into four independent dwelling units, notwithstanding the presence of certain building infrastructure (such as utility meters) that can be associated with multi-unit buildings.

Appellants reasonably understood the Property to be a single-family home from a functional and physical standpoint, notwithstanding its technical classification, and had no notice that ownership would expose them to extraordinary liability stemming from unbuilt and long-abandoned development approvals.

As first-time homeowners, Appellants relied on the as-built condition of the Property, the City's 2016 issuance of a Certificate of Final Completion, the representations reflected in MLS marketing, and the fact that **the Property had passed through two successive arms-length transactions without enforcement action**. Appellants did not and could not reasonably have anticipated that addressing the discrepancy would require reinstating a four-unit configuration that had never been constructed and was incompatible with the existing building.

Since acquiring the Property, Appellants have lived in the home full-time with their two young children and have invested significant time, resources, and professional expertise into understanding and resolving the Property's complex regulatory history. When the full scope of the discrepancy between City records and the as-built condition became clear, Appellants chose to engage openly with City agencies and pursue a lawful, policy-aligned resolution — rather than litigate, delay, or avoid the issue.

This divergence between the Property's technical designation, certain building infrastructure, and its as-built residential layout is addressed further below and is central to understanding how the City's records came to reflect a four-unit approval that was never realized in construction.

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#### **IV. Material Divergence Between Approved Plans and the As-Built Condition**

The approved plans associated with the prior developer's project depict a four-unit residential building, including separate dwelling configurations that would require multiple kitchens, independent internal circulation, unit separations, and life-safety systems consistent with multi-unit construction.

However, the **as-built condition of the Property materially diverges from those approved plans**, not in minor or cosmetic ways, but in **fundamental architectural, structural, and life-safety respects**.

As confirmed by Appellants' architect, Stephen Sutro, the physical configuration of the building as it existed at the time of the 2016 Certificate of Final Completion — and as documented in 2017 MLS marketing materials — reflects a single-family residence with one continuous layout and one kitchen, not a constructed four-unit building.

From an architectural and construction standpoint, converting the approved four-unit configuration into the as-built single-family condition documented in 2017 would have required **extensive, highly visible, and time-intensive reconstruction**, including but not limited to:

- **Relocation of vertical circulation**, including shifting stairwells by multiple feet to eliminate independent unit access;
- **Relocation of the elevator shaft**, including structural re-framing and re-alignment of floor penetrations;
- **Removal or reconfiguration of required fire-rated separations and fire walls** mandated for multi-unit construction;
- **Major structural modifications**, including alteration or removal of steel support elements installed to support the approved multi-unit layout;
- **Substantial reconfiguration of floor plates**, load paths, and framing to unify what would otherwise be discrete dwelling units;
- **Significant plumbing, electrical, and mechanical rework**, far beyond the removal of kitchens, to eliminate independent unit systems; and

- **Extensive demolition and reconstruction** affecting the building's core structure, not merely finishes.

This scope of work would have been **foundational, noisy, prolonged, and unmistakable** — the kind of construction that neighbors would observe, inspectors would document, and permits would reflect. No such work appears in the permit record, inspection history, or physical evidence within the building.

No evidence exists — in permits, inspection records, construction documentation, or physical traces — that this level of reconstruction occurred between the issuance of the **Certificate of Final Completion** and the **2017 sale of the Property**.

Accordingly, in the professional opinion of Appellants' architect, the as-built single-family layout documented in 2017 **could not have been created after final inspection**, and therefore must reflect the condition in which the developer completed and delivered the project — notwithstanding the four-unit plans on file with the City.

This material divergence between the approved plans and the as-built condition explains how the City's records came to reflect a four-unit approval that was **never realized in construction**, and why subsequent owners reasonably relied on the physical reality of the building rather than on unbuilt plans.

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## **V. Discovery of the Discrepancy and Enforcement Action**

For several years following Appellants' purchase of the Property in 2021, the building continued to function as it had for nearly a decade: as a single-family residence in the as-built configuration completed by the prior developer and reflected in City approvals, MLS listings, and lender inspections.

In 2022, Appellants first became aware of a potential discrepancy between the City's records and the as-built condition of the Property as a result of an anonymous complaint made to the City. Until that point, no enforcement action had been initiated, and the Property had passed through multiple prior inspections, transactions, and periods of occupancy without issue.

Upon learning of the discrepancy, Appellants did not dispute the City's authority or attempt to evade review. Instead, they **immediately engaged with City agencies**, retained experienced legal and architectural professionals, and sought to understand the full scope of the Property's regulatory history — including approvals, inspections, and as-built conditions that predated their ownership.

As the record was developed, it became clear that the discrepancy did not stem from any action taken by Appellants, but rather from the **disconnect between the prior developer's approved plans and the building that was ultimately constructed, inspected, and delivered**. The complexity of that disconnect — compounded by decades of inconsistent documentation across City departments — required extensive professional analysis to untangle.

Throughout this process, Appellants acted transparently and cooperatively, sharing information with City staff, responding to requests, and pursuing a lawful path forward rather than resisting enforcement. At no point did Appellants seek to preserve the status quo without review; instead, they consistently sought guidance on how to bring the Property into compliance in a manner aligned with City policy and neighborhood impacts.

This good-faith engagement ultimately led to the Conditional Use Authorization application that is the subject of this appeal.

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## VI. Good-Faith Efforts to Comply and the Infeasibility of Reinstating Four Units

Following discovery of the discrepancy between the City's records and the as-built condition of the Property, Appellants undertook substantial efforts to comply with City direction and identify a lawful path forward.

In good faith, Appellants initially attempted to pursue reinstatement of the four-unit configuration reflected in City records. To do so, they:

- retained experienced land-use counsel and architects;
- prepared and submitted plans for review;
- paid required City fees; and
- engaged in repeated consultations with City staff over an extended period.

Through this process, Appellants invested significant personal and financial resources into understanding the Property's regulatory history and exploring compliance options — including substantial out-of-pocket costs for professional services and City fees. These expenditures were made solely to resolve an issue Appellants did not create and to pursue a compliant solution in collaboration with the City.

As the analysis progressed, it became clear that reinstating four units would require major reconstruction, including extensive structural, circulation, and life-safety modifications that are incompatible with the existing building. This conclusion was not speculative; it was reached through professional architectural evaluation and confirmed through the permitting and review process.

Reinstating four units would:

- require foundational and structural reconstruction far exceeding the scope of a typical remodel;
- result in extremely low-quality, inefficient housing;
- significantly prolong construction duration; and
- almost certainly displace Appellants' family from their home.

Importantly, the **Planning staff report itself acknowledges that the building, as it actually exists, cannot reasonably accommodate four dwelling units.** Thus, the infeasibility of reinstating four units is not merely a matter of preference or cost, but one of **physical reality and proportionality.**

Faced with these constraints, Appellants did not abandon compliance efforts. Instead, they sought an alternative approach that would correct the record, add real housing, and minimize disruption — leading to the Conditional Use Authorization application that is the subject of this appeal.

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## VII. Proposed Project and Public Benefits

Appellants propose to resolve the long-standing discrepancy affecting the Property by converting the existing single-family residence into a **lawful two-unit building** that reflects both the physical reality of the structure and the City's housing policy goals.

Under the proposed project, the Property would consist of:

- a family residence occupying the upper levels of the building; and
- a new approximately 440-square-foot studio dwelling unit on the lower level.

The proposed studio would be a **rent-controlled unit**, adding long-term, protected housing to San Francisco's housing stock where none has existed in nearly a decade. This unit would be safe, code-compliant, and designed for real occupancy — not theoretical compliance.

This approach delivers tangible public benefits while avoiding the harms associated with reinstating a four-unit configuration that was never constructed. Specifically, the proposed project:

- **Adds real housing**, converting long-standing “paper units” into an actual, habitable dwelling;
- **Creates a new rent-controlled unit**, advancing the City's equity and anti-displacement goals;
- **Minimizes construction duration and neighborhood disruption**, avoiding the extensive, foundational reconstruction that reinstating four units would require;
- **Preserves family housing**, allowing Appellants and their children to remain in their home and community; and
- **Aligns with City policy**, including recent Commission and Board actions recognizing the importance of feasibility, proportionality, and actual housing outcomes.

Importantly, the proposed project represents a **net improvement** over the status quo and over the four-unit configuration reflected in City records. Rather than forcing reconstruction of a building that never existed, the proposal regularizes the Property's use while adding a new dwelling unit that can be occupied immediately upon completion.

Appellants have consistently sought a solution that balances the City's housing objectives with physical reality, neighborhood impacts, and fairness. The proposed two-unit configuration accomplishes those goals and represents the most reasonable and effective path forward.

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## VIII. Planning Commission Proceedings and Tie Vote

The Conditional Use Authorization application for the Property was heard by the Planning Commission on **December 4, 2025**. The hearing included extensive testimony, visual evidence, and professional analysis regarding the Property's history, as-built condition, and the feasibility of reinstating a four-unit configuration.

Following deliberation, the Planning Commission voted **3–3** on the proposed project. As a result of this tie vote, the application was **deemed denied by operation of procedure**, rather than by an affirmative finding on the merits.

The tie vote reflects the Commission's division regarding how best to resolve the unusual and complex circumstances presented by the Property. It does not constitute a determination that the proposed project

conflicts with City policy, nor does it negate the substantial evidence in the record supporting the feasibility and public benefits of the proposed two-unit configuration.

During deliberations, multiple Planning Commissioners described the circumstances facing Appellants as deeply unfair and expressed sympathy for the hardship imposed by actions of a prior developer and by gaps in the City's enforcement process. While Commissioners repeatedly acknowledged the human and equitable impacts of the case, the Commission ultimately split 3–3 and was unable to reach a majority decision on a path forward.

This appeal seeks review by the Board of Supervisors to provide clarity and resolution where the Planning Commission was unable to reach a majority decision.

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## IX. Disproportionate Impact, Equity, and Fairness Considerations

Absent approval of the proposed project, Appellants face **extraordinary and disproportionate consequences** for circumstances created entirely by a prior developer's actions and by decades of inconsistent City records.

Appellants did not construct the unpermitted units, did not seek or fail to build the four-unit configuration reflected in City approvals, and did not benefit from the discrepancy between approved plans and the as-built condition of the Property. Yet, without relief, Appellants alone bear the burden of correcting that discrepancy — potentially through reconstruction of a building configuration that never existed and that even Planning staff acknowledges is infeasible.

Equity and fairness considerations weigh strongly in favor of the proposed project. Appellants are long-term San Francisco residents who have invested deeply in their neighborhood and in the City. They have acted transparently, complied with enforcement direction, spent significant personal resources, and pursued a solution that adds housing rather than seeking to preserve the status quo.

Penalizing good-faith homeowners for a prior developer's failure to construct approved plans would undermine the City's stated goals of encouraging compliance, transparency, and collaboration. By contrast, approving the proposed project ensures that responsibility is addressed proportionally and that City policy is advanced through the creation of real, livable housing.

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## X. Conclusion

This appeal presents the Board of Supervisors with a clear opportunity to resolve a long-standing and unusually complex situation in a manner that is fair, practical, and aligned with San Francisco's housing goals.

The record demonstrates that the four-unit configuration reflected in City approvals was **never constructed**, that reinstating it is **physically infeasible**, and that Appellants have acted consistently in good faith to correct a problem they did not create. The proposed project converts a long-standing discrepancy into a tangible public benefit by adding a new rent-controlled unit while minimizing neighborhood disruption and preserving family housing.

For these reasons, Appellants respectfully request that the Board of Supervisors disapprove the Planning Commission's action and approve the Conditional Use Authorization for the proposed two-unit project at 524 Vallejo Street.

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# EXHIBIT B

## Planning Commission Hearing Record and De Facto Denial

524 Vallejo Street – Conditional Use Authorization Appeal

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### B-1. Purpose of This Exhibit

This Exhibit documents the Planning Commission’s December 4, 2025 public hearing on Conditional Use Authorization Application No. 2024-011561CUA for 524 Vallejo Street and the resulting **de facto disapproval** of the application.

At the conclusion of the December 4, 2025 hearing, the Planning Commission voted 3–3 on a motion regarding the Conditional Use Authorization. In the absence of any alternate motion, the Commission’s Secretary expressly stated on the record that the Conditional Use Authorization request was “**de facto disapproved.**”

As of the date of filing this appeal (**January 5, 2026**) — a full month following the hearing — the Planning Department has not issued a Notice of Decision or Final Motion memorializing the Commission’s action. **Appellants have again formally requested these materials from the Planning Department and will promptly supplement this appeal with the Notice of Decision and/or Final Motion upon receipt.**

During this period, Appellants sought clarification regarding their appeal rights and were initially provided inaccurate procedural guidance. On **December 30, 2025**, the Director of Commission Affairs (Jonas Ionin) confirmed—pursuant to direction from the **City Attorney’s Office**—that Appellants do, in fact, have the right to appeal the Planning Commission’s de facto disapproval. The Director further acknowledged that prior guidance provided to Appellants had been incorrect.

Between **December 30, 2025 and January 5, 2026**, only **two City business days** were available to Appellants to prepare and file this appeal, excluding weekends, City-recognized holidays, winter recess, and a period during which City Hall was closed due to an unplanned power outage.

Given the statutory appeal deadline, the intervening City holiday closures and winter recess, the unavailability of City offices during the power outage, and the continued absence of a written decision as of this filing, Appellants are submitting this appeal based on the most complete and authoritative record currently available. That record includes contemporaneous, official City materials generated at the December 4, 2025 hearing, including the official hearing transcript, draft meeting minutes, and video record.

This Exhibit is submitted to preserve Appellants’ appeal rights based on the Planning Commission’s stated procedural outcome and to document the Commission’s consideration of the application and its de facto disapproval on the record. Submission of this Exhibit is without prejudice to the inclusion of any subsequently issued Notice of Decision or Final Motion should such documents be released.

Accordingly, this Exhibit is provided **in lieu of a Notice of Decision or Final Motion** and consists of the official hearing record establishing that the Conditional Use Authorization application was **de facto disapproved**.

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## B-2. Draft Planning Commission Meeting Minutes

Attached are the draft Planning Commission meeting minutes for December 4, 2025, reflecting:

- The item number and project description for 524–526 Vallejo Street / 4–4A San Antonio Place;
- The motions made by Commissioners, including a motion to continue and a motion to deny;
- The vote counts for each motion; and
- The resulting procedural outcome of the hearing.

12. [2024-011561CUA](#) (V. PAGE: (628) 652-7396)  
[524-526 VALLEJO STREET AND 4-4A SAN ANTONIO PLACE](#) – north side between Grant Avenue and Kearny Street; Lot 009 in Assessor's Block 0132 (District 3) – Request for **Conditional Use Authorization** pursuant to Planning Code Sections 303 and 317 to legalize the merger of three dwelling units on second and third floors into one dwelling unit and to reinstate one dwelling unit on the ground floor within an existing four-unit residential building located within a RM-1 (Residential Mixed, Low Density) Zoning District, Telegraph Hill – North Beach Residential SUD (Special Use District), Priority Equity Geographies SUD (Special Use District), and 40-X Height and Bulk District. The Planning Department found that the project is exempt from the California Environmental Quality Act (CEQA). The Commission's action constitutes the Approval Action for the project for the purposes of CEQA, pursuant to San Francisco Administrative Code Section [31.04](#) (h).  
*Preliminary Recommendation: Deny*  
[Disclosure from Commissioner Kathrin Moore](#)

SPEAKERS: = Vincent Page – Staff report  
+ Katelin Holloway – Project sponsor presentation  
+ Stephen Sutro – Project sponsor presentation  
- Steve Dratler - Illegally merged housing unit, roof deck  
- Theresa Flandrich – Supports denial, precedent  
+ Jamie Vigil – Present owners should not be punished  
+ Kevin Lew – Owners are good people  
+ Alex Nor – Thoughtful owners  
+ Susan Taylor – Great neighbors  
- Georgia Schuttish – Strong tenant protection, enforcement reviewing violations  
+ Lindsay Lew – Homeowner in the city  
= Elizabeth Watty – Response to comments and questions

ACTION: After a motion to continue failed +3 -3 (Williams, Imperial, Moore against, Braun absent); and a motion to Deny failed +3 -3 (Campbell, McGarry, So against, Braun absent); De Facto Denied

ADJOURNMENT – 3:16 PM

**The draft minutes record that no motion received four affirmative votes and that the Conditional Use Authorization was therefore not approved.**

**Source:** San Francisco Planning Commission – Draft Meeting Minutes, December 4, 2025.

 20251204\_cpc\_min.pdf

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### B-3. Official Planning Commission Hearing Transcript

The official transcript of the December 4, 2025 Planning Commission hearing, prepared and provided by Appellants' expeditor, Deborah Holley, is included as part of this exhibit to document the Commission's deliberations, procedural actions, and ultimate disposition of the Conditional Use Authorization application.

The excerpts included are representative and are provided to document the procedural sequence and outcome of the hearing, including:

- Staff presentation and procedural framing of the item;
- Public testimony and project sponsor presentations;
- Commissioner questions and deliberations;
- Motions made and votes taken; and
- Statements by the Commission Secretary regarding the result of the votes.

The transcript reflects that:

- A motion to continue the matter was made and failed to receive the required number of votes;
- A motion to deny the Conditional Use Authorization was made and seconded;
- The denial motion received three votes in favor and three votes opposed; and
- Following the vote, the Commission Secretary stated on the record:


*“Okay, that motion fails three to three. If there is not an alternate motion, **the conditional use request is de facto disapproved.** I’m not hearing an alternate motion.”*

- No alternate motion was made.

*“So there you have it. **It’s a 3–3 vote, de facto disapproval.**”*

These transcript excerpts establish that no motion received the four affirmative votes required for adoption and that the Conditional Use Authorization was therefore **de facto disapproved**.

**Source:** *Planning Commission Hearing Transcript, December 4, 2025.*

 524 VALLEJO STREET PLANNING COMMISSION HEARING TRANSCRIPT 12.docx , [https://sfgovernmentconnection.com/meetings/Planning\\_Commission/2025-12-04/transcript.html?startTime=7610.9404&endTime=11498.476](https://sfgovernmentconnection.com/meetings/Planning_Commission/2025-12-04/transcript.html?startTime=7610.9404&endTime=11498.476)

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### B-4. Planning Commission Hearing Video Recording

A video recording of the December 4, 2025 Planning Commission hearing is publicly available via the City's Granicus platform and is included by reference as part of the official record. **Link:**

[https://sanfrancisco.granicus.com/player/clip/51275?view\\_id=20&redirect=true](https://sanfrancisco.granicus.com/player/clip/51275?view_id=20&redirect=true)

The recording corroborates the procedural sequence reflected in the draft minutes and transcript, including the motions, votes, and on-the-record statements regarding de facto disapproval.

- At minute marker 3:08:03, the discussion to consider a procedural alternative begins, resulting in a motion to continue (3:09:40);
- Motion to continue was seconded and placed before the Commission (3:10:00), resulting in a failing 3-3 vote;
- Denial motion was then put to roll-call vote (3:10:35), again resulting in a de facto denial with a 3-3 vote (3:11:00).

*Source: San Francisco Planning Commission Hearing Video (Dec. 4, 2025)*

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## **B-5. Summary of Record**

The materials included in this exhibit demonstrate that the Planning Commission:

- Considered the Conditional Use Authorization application for 524 Vallejo Street at a duly noticed public hearing;
- Entertained multiple motions regarding the application;
- Failed to adopt any motion receiving four affirmative votes; and
- Stated on the record that the Conditional Use Authorization was therefore **de facto disapproved**.

This exhibit is submitted to establish the procedural posture of the case for purposes of appeal in the absence of a Notice of Decision or Final Motion.

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## **B-6. Reservation of Rights**

Appellants reserve the right to supplement this exhibit with any subsequently issued Notice of Decision, Final Motion, or related documentation generated by the Planning Department or Planning Commission.

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# 524 Vallejo Street

EXHIBIT C: Photographic and MLS Records  
Demonstrating Long-Standing As-Built Condition

---

2017 • 2021 • Current



## **EXHIBIT C:**

### **Photographic and MLS Records Demonstrating Long-Standing As-Built Condition**

Exhibit D documents the consistent, long-standing physical configuration and use of the Property as a single-family residence through two arms-length sales (2017 and 2021) and into the present day. The images from the 2017 listings, the 2021 listings, and current conditions tell a consistent story: for nearly a decade, the Property has had one architecture, one layout, and one use — a single-family home.

These materials demonstrate continuity of layout, circulation, and use, and corroborate that the four-unit configuration approved on paper was never constructed. Despite plans filed with the City, there is no material or visual evidence that a four-unit building existed at any point during this period — only a single, continuous home resulting from the prior developer's remodel following the 2010 purchase.

*Exhibit D does not interpret or argue Planning Code requirements; it documents physical conditions and continuity over time.*


# Section C-1: 2017 MLS Listing Materials

The 2017 MLS listing describes the Property as a single-family residence, with no indication of a four-unit building in the marketing materials.

[https://www.realtor.com/rentals/details/524-26-Vallejo\\_San-Francisco\\_CA\\_94109\\_M27602-94766](https://www.realtor.com/rentals/details/524-26-Vallejo_San-Francisco_CA_94109_M27602-94766)  
[https://www.realtor.com/realestateandhomes-detail/524-526-Vallejo-St\\_San-Francisco\\_CA\\_94133\\_M20503-05070](https://www.realtor.com/realestateandhomes-detail/524-526-Vallejo-St_San-Francisco_CA_94133_M20503-05070)

realTOR.COM Buy Sell Rent Mortgage Find an Agent My Home News & Insights Manage rentals Advertise Log in Sign up

< Back San Francis X Q California > San Francisco.Count > San Francisco > Vallejo St > 524-526 Vallejo St View as owner



Fly around 1/40

What's your equity? (It's easy to find out)

- Off Market

5 bed **3,713** sqft

524-526 Vallejo St, San Francisco, CA 94133

Single Family Property type 1907 Year built

View as owner Share

US Military & Veterans \$100,000 Home Giveaway. See Off. Rules

Connect with an agent

Full name\*


Email\*

Phone\*

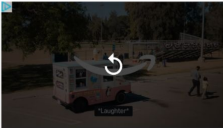
Are you selling or buying?\*

Connect

By proceeding, you consent to receive calls and texts at the number you provided, including marketing by automated and prerecorded and artificial voice, and email, from realtor.com and others about your inquiry and other home-related matters, but not as a condition of any purchase. [More...](#)



TELEGRAPH HILL NORTH BEACH Broadway Street View CHINA (Map data ©2025 Google)



Learn more

## Property details

### Interior

#### Bedrooms

- Bedrooms: 5

#### Other rooms

- Main Level: 1 Bedroom, 2 Baths, 1 Master Suite, Living Room
- Upper Level: 1 Bedroom, 1.5 Baths, 1 Master Suite, Kitchen
- Lower Level: 1 Bedroom, 1 Bath, 1 Master Suite

### Features

#### Home Features

- Special Features: Elevator/Lift

#### Building and Construction

- House Style: Contemporary, Custom, Edwardian
- Levels Or Stories: 4
- Exterior: Stucco, Redwood Siding

### Exterior

#### Exterior and Lot Features

- Views: Panoramic, City Lights, San Francisco, Downtown
- Lot Measurement: Sq Ft

#### Garage and Parking

- Garage: Attached, Garage, Auto Door, Interior Access

### Listing

#### Other Property Info

- County: San Francisco
- Area: Sf District 8, G
- Subdivision: Telegraph Hill
- Zoning: Rm-1
- Shopping: 1 Block
- Transportation: 1 Block
- Cross Street Address: Kearny

#### Listing Information

- Type: 4+ Story

Show less ^

# Section C-1: 2017 MLS Listing Layout

The 2017 MLS floor plans depict the Property as a single-family residence, with one kitchen and a single, unified circulation pattern.



FIRST FLOOR PLAN



SECOND FLOOR PLAN



THIRD FLOOR PLAN



FOURTH FLOOR PLAN

# Section C-2: 2021 MLS Listing Materials (Appellants' Purchase)

The 2021 MLS listing describes the Property as a single-family residence, with no indication of a four-unit building in the marketing materials.

[https://www.zillow.com/homedetails/524-526-Vallejo-St-San-Francisco-CA-94133/331547204\\_zpid/](https://www.zillow.com/homedetails/524-526-Vallejo-St-San-Francisco-CA-94133/331547204_zpid/)

Back to search Zillow

Home value Cost calculator Home details Neighborhood

### What's special

Situated where Tele Hill meets N.Beach, 524 Vallejo offers rare opportunity to have iconic views & walkability to world-class restaurants & amenities from your home. An elevator serves the home from the garage to main lev. Renovated in 2015, the home seamlessly blends a historic exterior w/a clean, modern yet warm interior. Main lev. of home feat. chef's kit, din, & fam area w/impressive views. Ensuite bed, w/full ba can be used as a media room or liv. room. The lev. is completed by a powder room & lg storage room w/ w/d. Below main lev, the bed lev boasts 3 beds, & 2 full ba. Master bed w/a spa-like ba provides a retreat after a long, hard day. 2 other beds & full ba complete the lev. An addl ensuite bed w/dir. access to side yard & sep. entrance is found at entry level. At the very top of the home, pent-level excludes a dream-like quality. The spacious pent-room w/full ba & closet, & accordion glass doors lead to lg roof terr. w/built-in bbq & sparkling views of SF.

This property is off market, which means it's not currently listed for sale or rent on Zillow. This may be different from what's available on other websites or public sources.

[^ Hide](#)

## Construction

### Type & style

- Home type: SingleFamily

### Condition

- Year built: 1907

## Community & neighborhood

### Community

- Community features: On Site Laundry Available

### Location

- Region: San Francisco

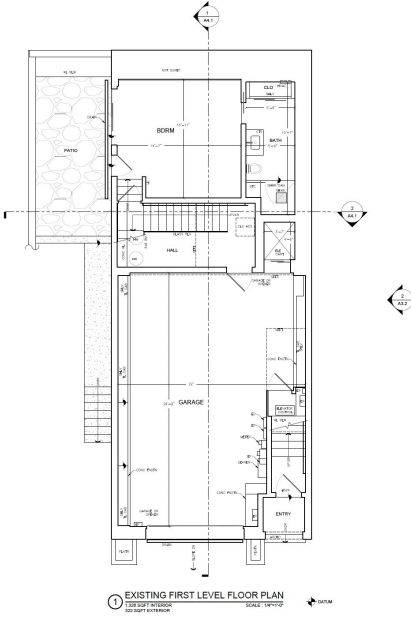
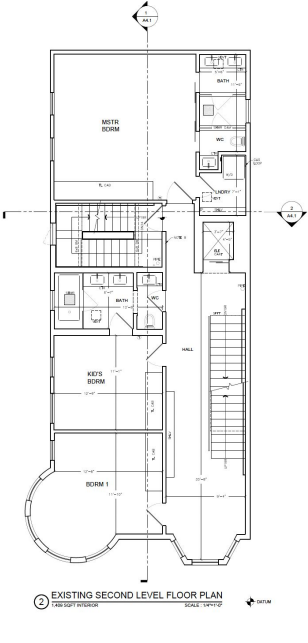
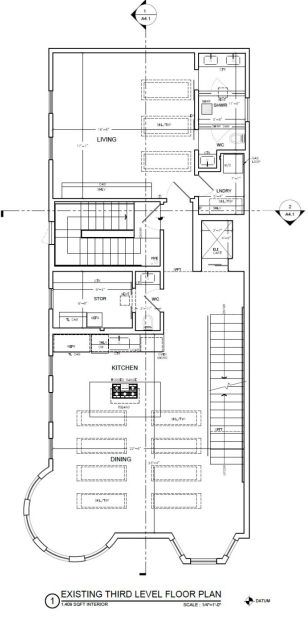
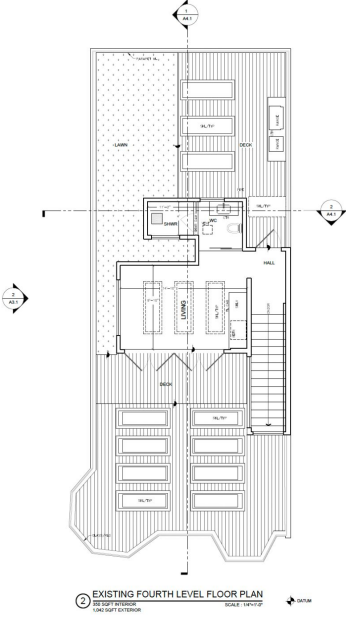
## Other

### Other facts

- Property Subtype 1: Single-Family Homes
- Family Room: View, Skylight(s)
- Lower Level: 2 Baths, 3 Bedrooms, 1 Master Suite
- Laundry Appliances: Hookups Only, Washer/Dryer, 220 Volt Wiring, In Closet
- Main Level: Dining Room, Family Room, Kitchen, .5 Bath/Powder, 1 Master Suite
- Other Rooms: Office
- Parking: Garage
- Special Features: Elevator/Lift
- Style: Custom, Victorian
- View(s): City Lights, San Francisco, Downtown
- Status: Active
- Dining Room: Dining Area, Lvng/Dng Rm Combo, Skylight(s)

- Construction: Wood Frame
- Shopping: 1 Block
- Transportation: 1 Block
- Bath Type/Includes: Remodeled, Shower and Tub, Stall Shower, Radiant Heat
- Upper Level: 1 Bath
- District: SF District 8
- Heating/Cooling Sys: Radiant
- Living Room: Skylight(s)
- Subdist: Telegraph Hill
- Square Footage Source: Per Graphic Artist
- Parking Leased: On Site
- # of Parking Spaces: 2
- Foundation: Concrete
- Lot Measurement: SqFt

# Section C-3: Current Layout (2024 As-Built Plans)



# Section C-3: Current Layout (2024 As-Built Plans)



1 EXISTING LONGITUDINAL SECTION

SCALE: 1/4"=1'-0"

# Section C-4: Ownership History (June 1994 - Present)

## 524 Vallejo St

San Francisco, CA 94133  
Telegraph Hill Neighborhood  
Estimated Value: **\$2,414,000 - \$4,596,000**

-- Bed	6 Baths	3,713 Sq Ft	\$1,085/Sq Ft Est. Value
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### About This Home

This home is located at 524 Vallejo St, San Francisco, CA 94133 and is currently estimated at \$4,027,229, approximately \$1,084 per square foot. 524 Vallejo St is a home located in San Francisco County with nearby schools including Chin (John Yehall) Elementary School, Francisco Middle School, and Sts. Peter And Paul K-8.

### Ownership History

Date	Name	Owned For	Owner Type
Apr 2021 - Present	Holloway Katelin and Ramirez Benjamin	4 Years and 7 Months	Private Individual
Jun 2017 - Apr 2021	Roumana Llc	3 Years and 10 Months	Company
Oct 2010 - Jun 2017	Iskandar Peter	6 Years and 8 Months	Private Individual
Oct 2002 - Oct 2010	Marenco William A	8 Years	Private Individual
Mar 2002 - Oct 2002	Marenco William A	7 Months	Private Individual
Mar 2002 - Mar 2002	Marenco William A	Less than a month	Private Individual
Jun 1994 - Mar 2002	Marenco William M	7 Years and 9 Months	Private Individual

Source: Public Records

# Section C-5: Comparative Evidence - Exterior

2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT



# Section C-5: Comparative Evidence - First Floor Bedroom

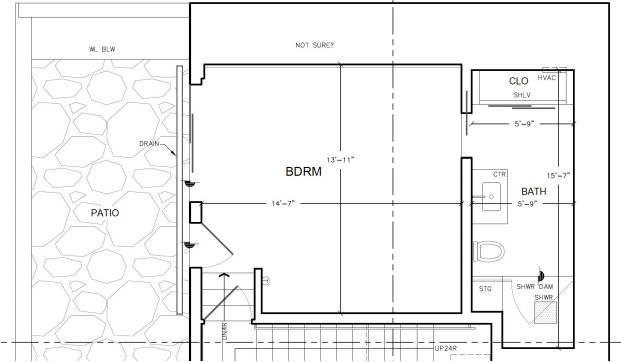
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - First Floor Bedroom

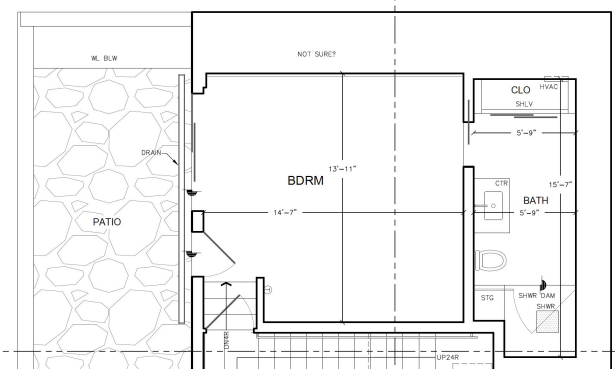
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT

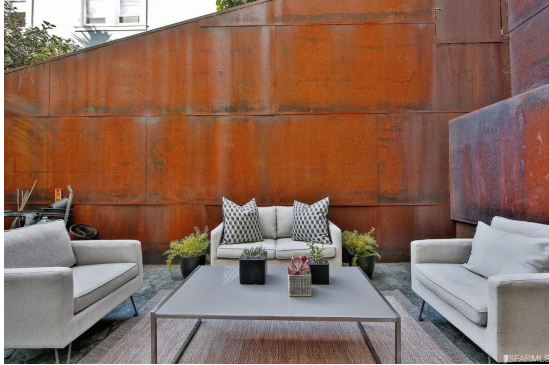


# Section C-5: Comparative Evidence - First Floor Patio

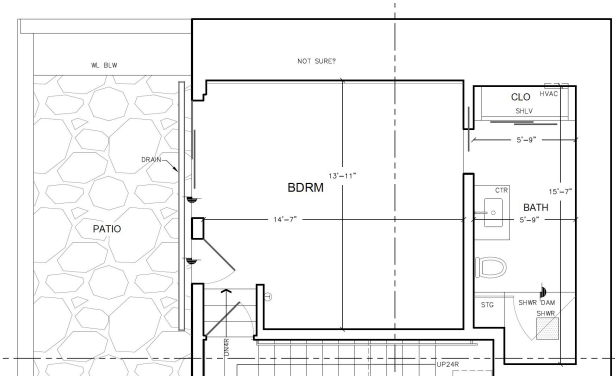
2017 MARKETING MATERIALS

No  
contemporaneous  
MLS photographs  
available

2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Second Floor Bathroom

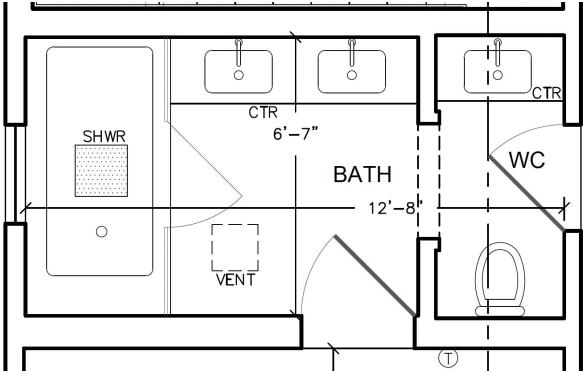
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT

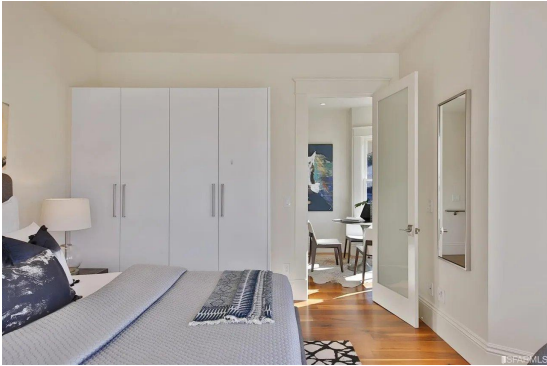


# Section C-5: Comparative Evidence - Second Floor Bedroom 1

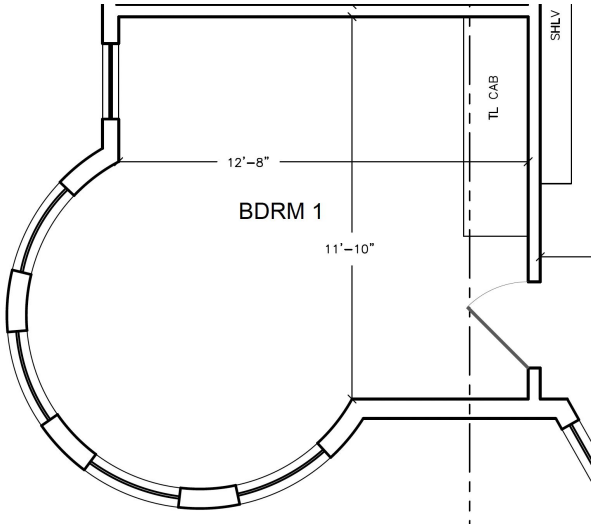
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Second Floor Bedroom 2

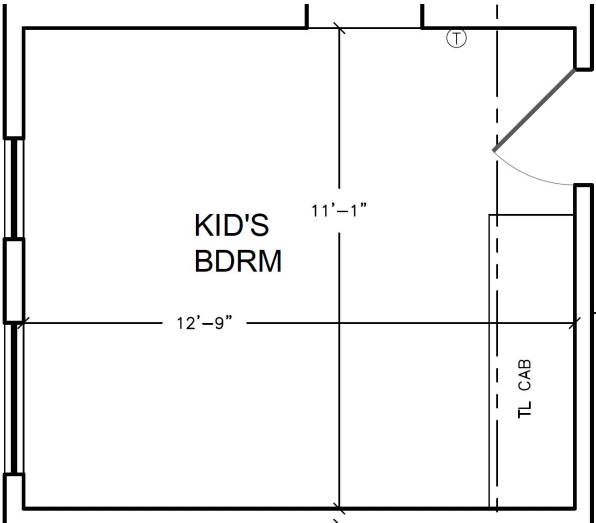
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



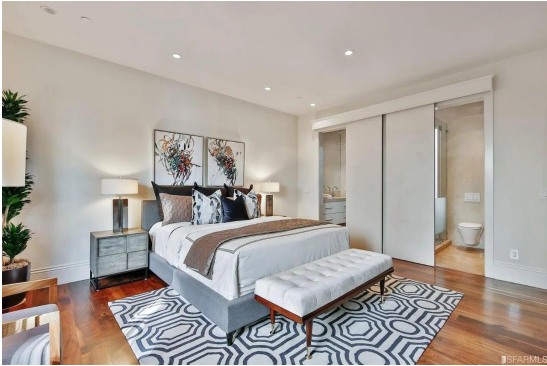


# Section C-5: Comparative Evidence - Second Floor Primary Bedroom

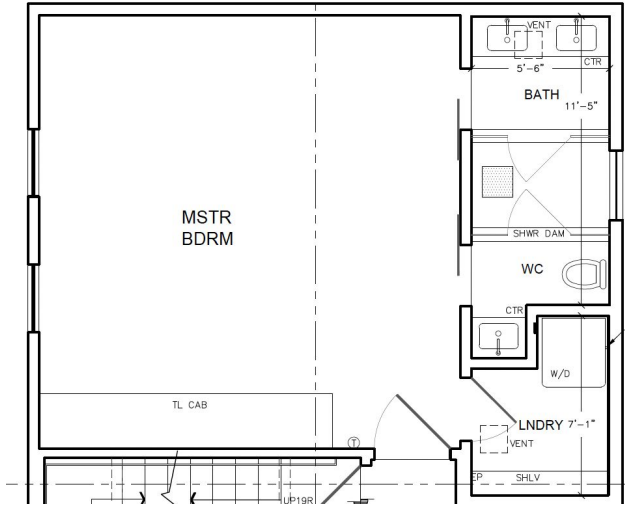
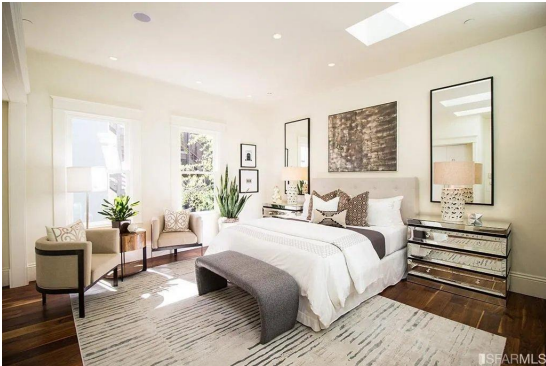
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Second Floor Primary Bedroom

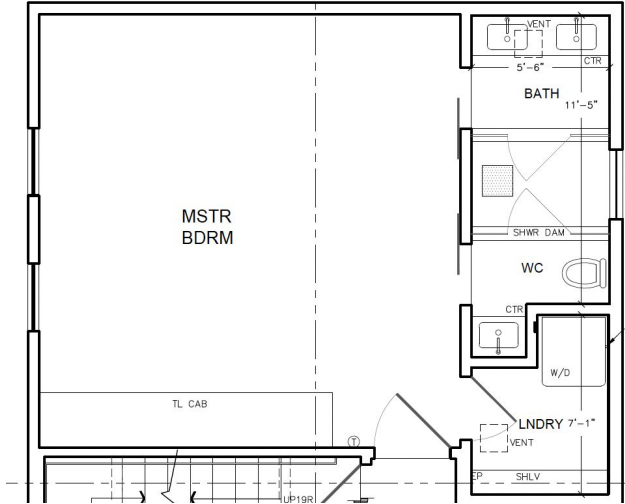
2017 MARKETING MATERIALS

No  
contemporaneous  
MLS photographs  
available

2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Second Floor Primary Bathroom

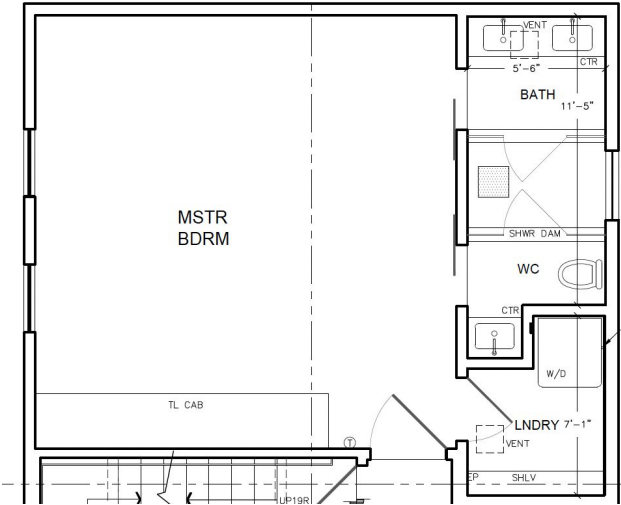
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Second Floor Primary Bathroom

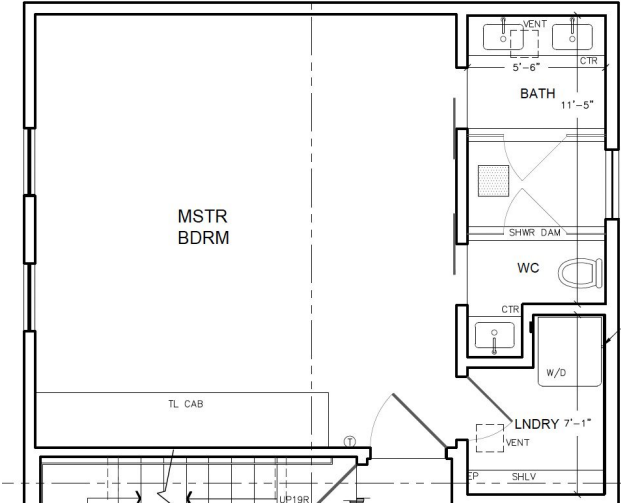
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Kitchen

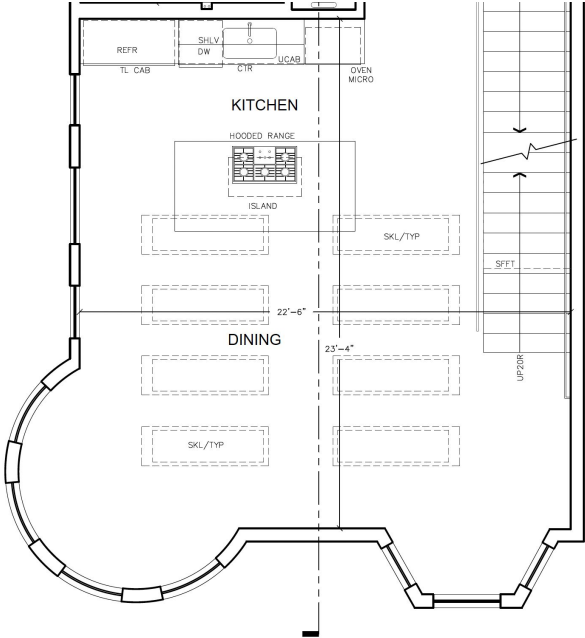
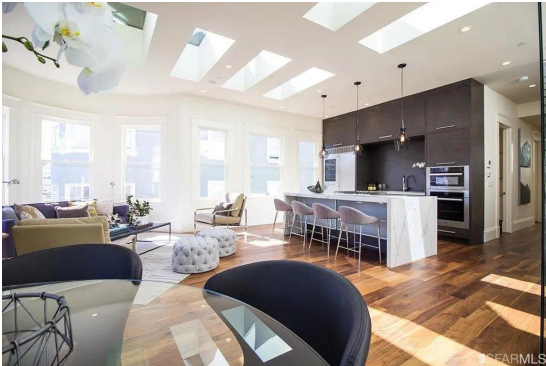
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Kitchen

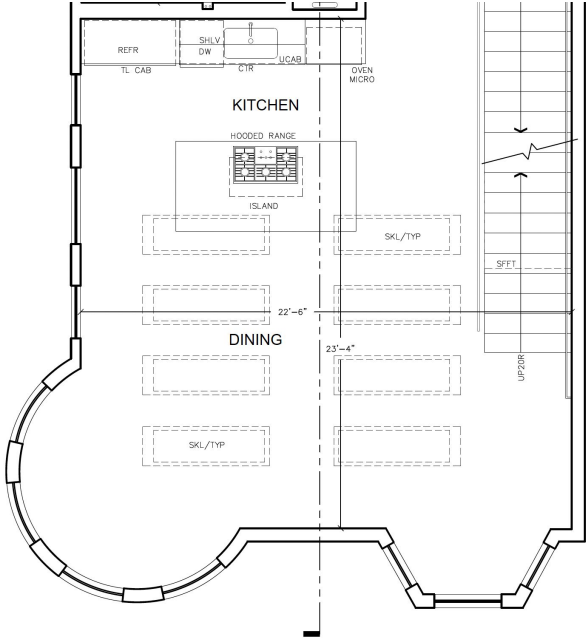
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Kitchen

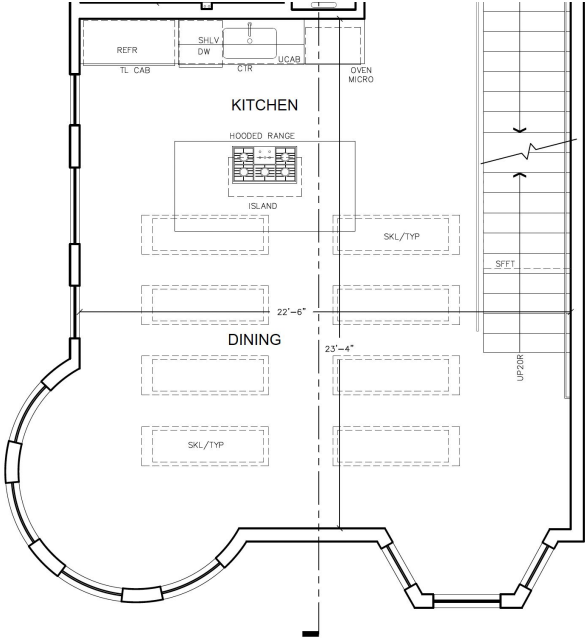
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Kitchen

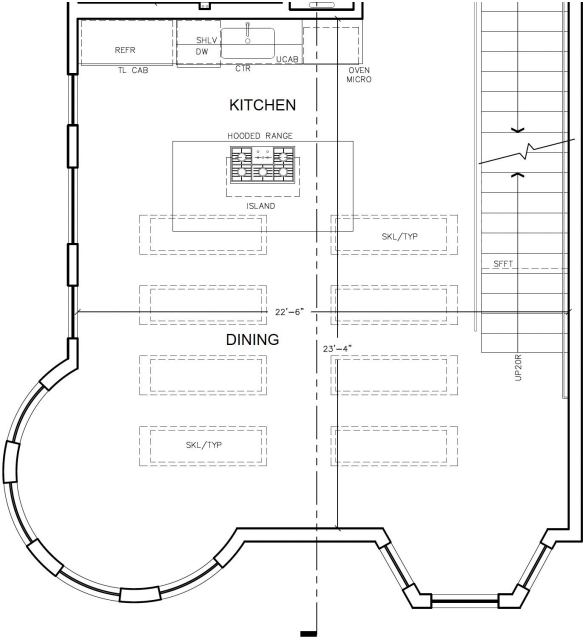
2017 MARKETING MATERIALS

No contemporaneous MLS photographs available

2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Pantry

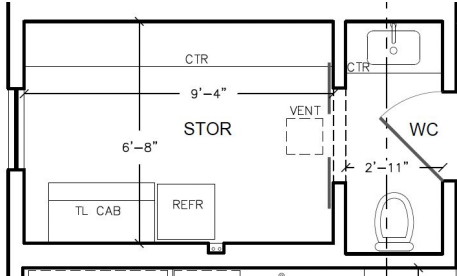
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT

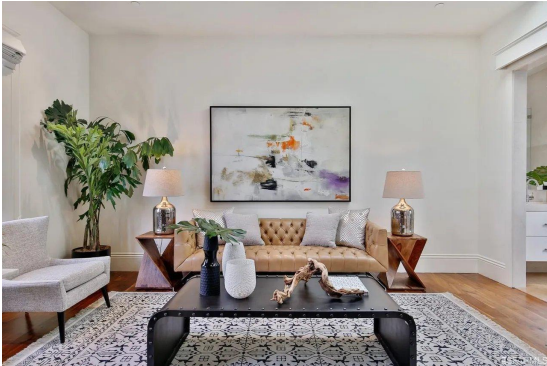


# Section C-5: Comparative Evidence - Third Floor Living Room

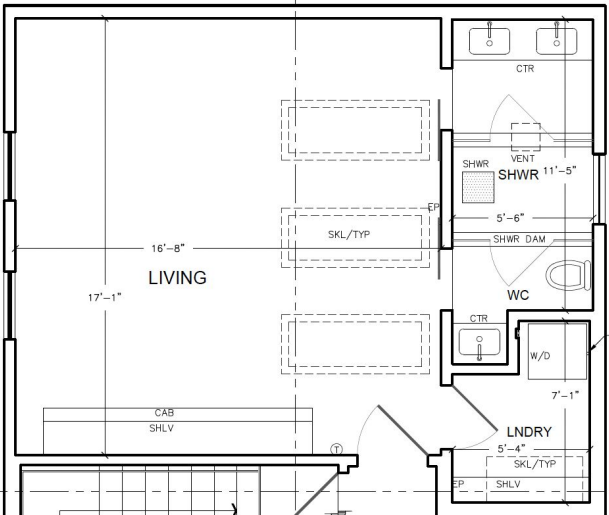
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Third Floor Living Room

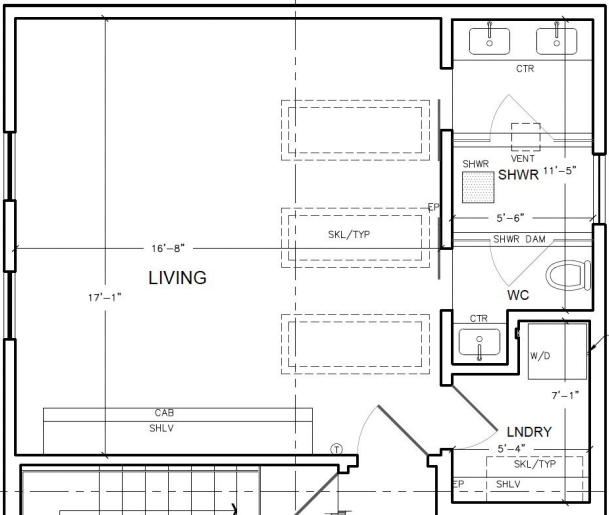
2017 MARKETING MATERIALS

No contemporaneous MLS photographs available

2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Pentroom

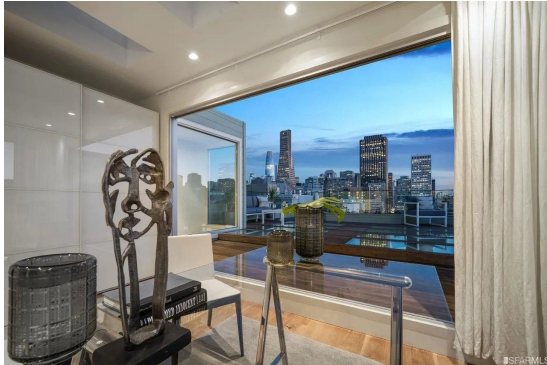
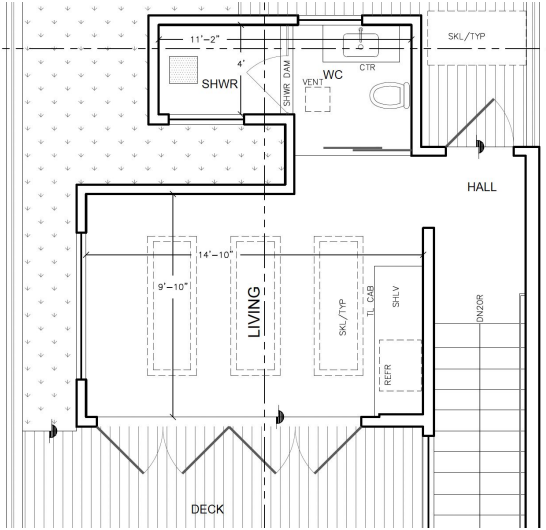
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Pentroom

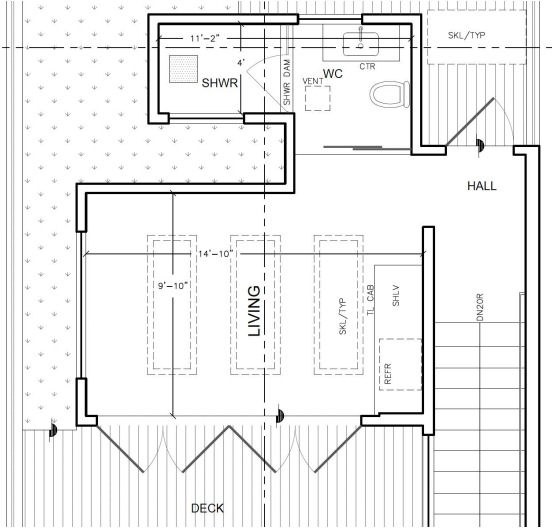
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Pentroom Bathroom

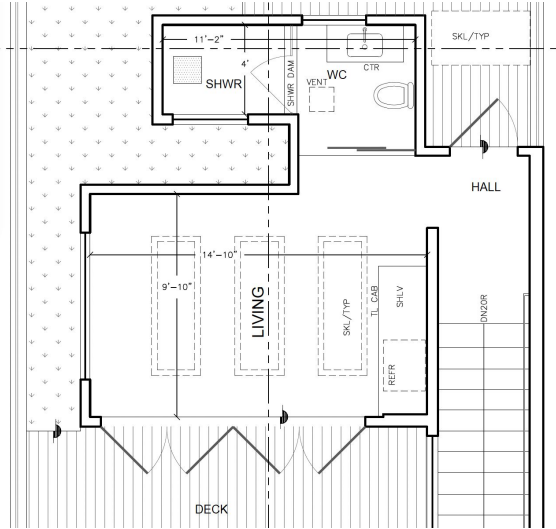
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT

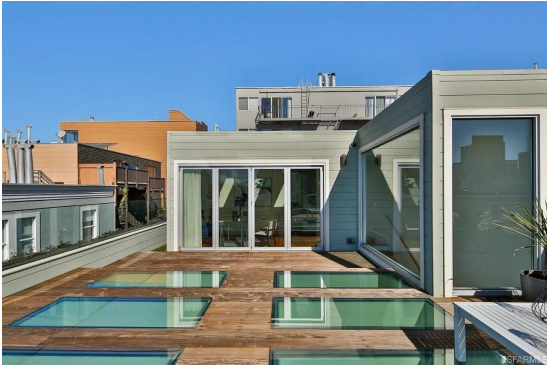


# Section C-5: Comparative Evidence - Roof Deck Front

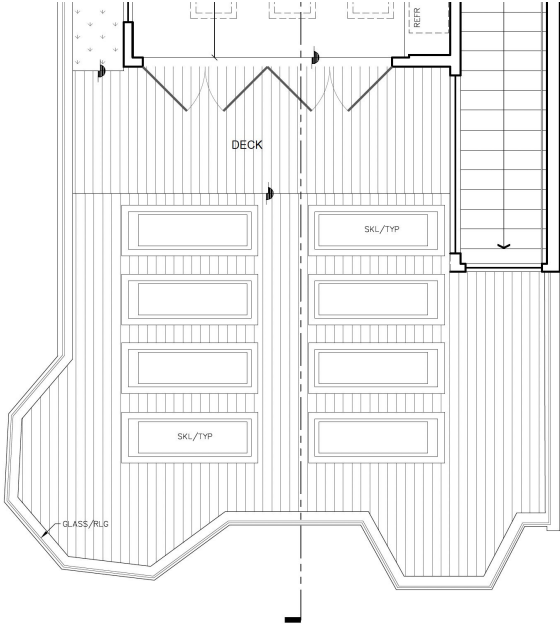
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Roof Deck Front

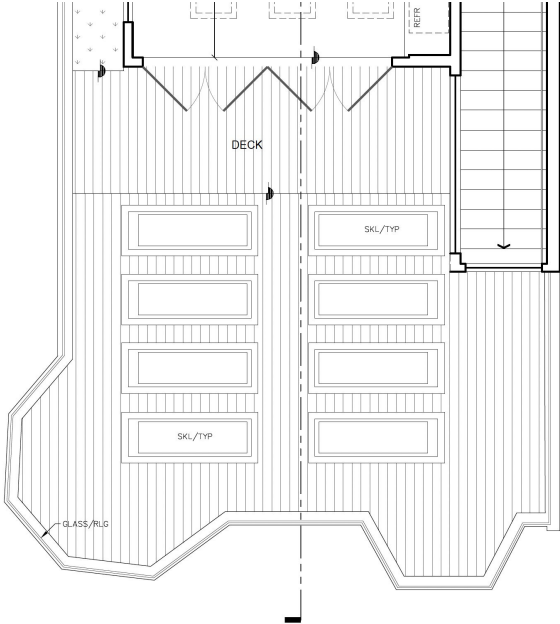
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT

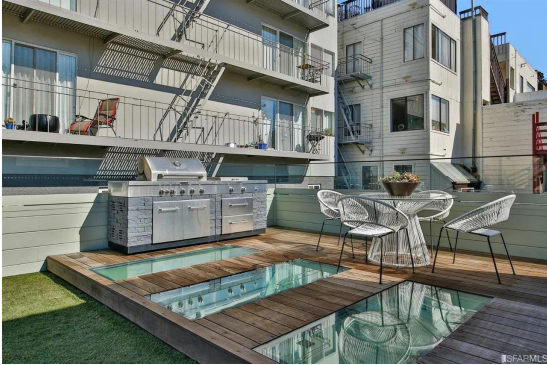


# Section C-5: Comparative Evidence - Roof Deck Rear

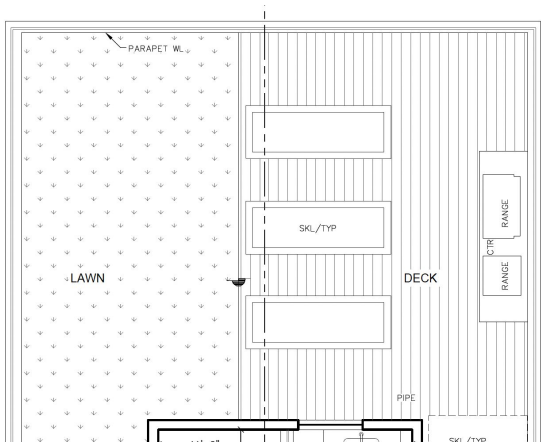
2017 MARKETING MATERIALS

No  
contemporaneous  
MLS photographs  
available

2021 MARKETING MATERIALS



CURRENT AS BUILT



# Section C-5: Comparative Evidence - Back Stairwell

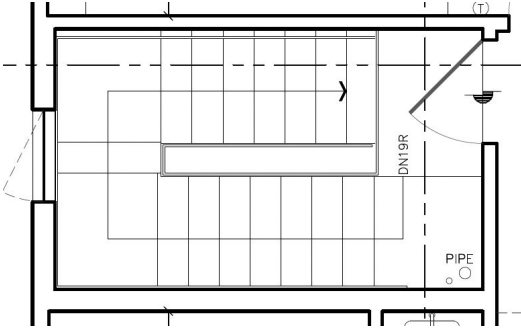
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS

No contemporaneous MLS photographs available

CURRENT AS BUILT



# Section C-5: Comparative Evidence - Garage

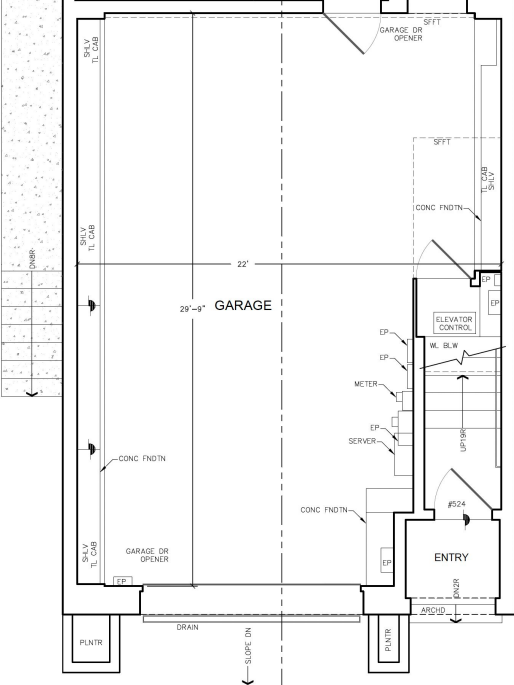
2017 MARKETING MATERIALS



2021 MARKETING MATERIALS



CURRENT AS BUILT



# EXHIBIT C:

## Summary of Visual Evidence

- MLS listings from 2017 and 2021 depict the Property as a single-family residence with one kitchen and a unified circulation pattern.
- Side-by-side comparisons show that the layout, circulation, and use have remained consistent across both arms-length sales and into the present day.
- Current photographs confirm that the as-built condition matches the layout shown in prior MLS materials.
- No photographic or visual evidence exists of a constructed four-unit configuration at any point during this period.
- The continuity of the physical layout over time corroborates professional analysis that the four-unit configuration approved on paper was never built.

# EXHIBIT C

## Photographic and MLS Records Demonstrating Long-Standing As-Built Condition


### 524 Vallejo Street – Conditional Use Authorization Appeal

---

This exhibit documents the long-standing physical configuration and use of the property at 524 Vallejo Street through two successive arm's-length sales (2017 and 2021) and into the present day. The materials included consist of MLS listings, floor plans, photographs, and related marketing records that reflect the property's as-built condition at each point in time.

Together, these records demonstrate continuity of layout, circulation, and use, and corroborate that the building functioned and was represented as a single-family residence for nearly a decade. The materials further show that the four-unit configuration approved on paper was not constructed and did not exist in physical form at the time of either sale or during Appellants' ownership.

This exhibit is submitted to provide visual and documentary context for the as-built condition of the property and to support the factual record regarding its long-standing use.

- File attached below  524 Vallejo Street - Exhibit D: Photographic and MLS Records Demons...
-

# 524 Vallejo Street

EXHIBIT D: Architectural Evidence Demonstrating Material Divergence Between Approved Plans and As-Built Condition

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## **EXHIBIT D:**

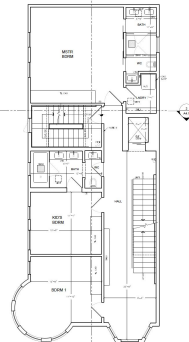
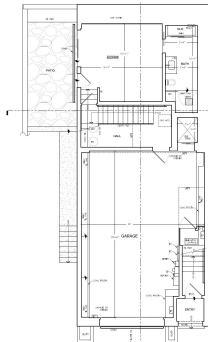
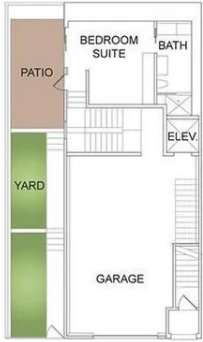
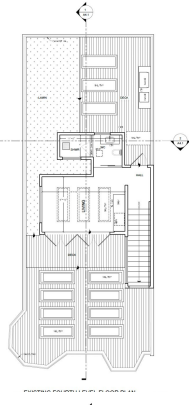
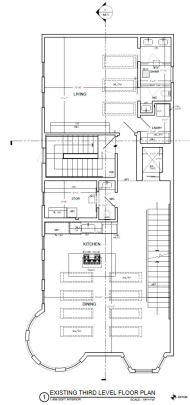
# Architectural Evidence Demonstrating Material Divergence Between Approved Plans and As-Built Condition

Exhibit D documents the material architectural and structural differences between the four-unit configuration approved on paper and the as-built condition of the Property. This exhibit demonstrates that the approved four-unit plans were never constructed and that the as-built condition signed off by the City could not have been altered post-Certificate of Final Completion without extensive, documented reconstruction.

# Documented Continuity of As-Built Layout (2017–2024)

2017 MLS Listing – Floor Plans

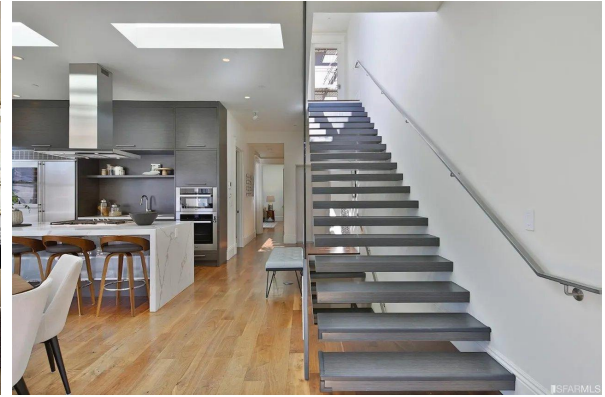
2024 As-Built Floor Plans



All available evidence reflects the **same single-family layout** from 2017 through the current as-built condition.

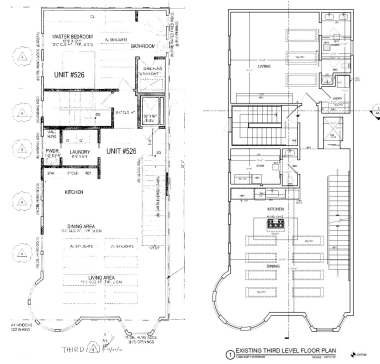
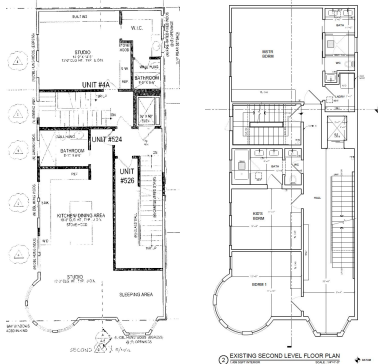
# Post-2016 As-Built Condition Does Not Reflect a Multi-Unit Configuration

The as-built condition lacks physical features typically required for independent dwelling units.



Approved 2013 Plans Compared to 2017 MLS Images and 2024 As-Built Drawings - 2nd Floor

Approved 2013 Plans Compared to 2017 MLS Images and 2024 As-Built Drawings - 3rd Floor



## Comparison of 2013 Approved Plans to 2017 MLS Images and 2024 As-Built Drawings indicates:

- Hallway alignment differs materially from approved plans
- Fire separations and independent unit entrances are not present
- No kitchen on the second floor
- No independent circulation between floors
- Elevator bank and stairwell locations differ materially
- Rear stair configuration differs in location and dimension
- Rear spaces function as bedrooms without kitchens
- Bathroom and laundry layouts differ from approved plans

# 2016 Certificate of Final Completion and City Inspections

Final inspection certified the as-built condition.

## Appointments:

Appointment Date	Appointment AM/PM	Appointment Code	Appointment Type	Description	Time Slots
------------------	-------------------	------------------	------------------	-------------	------------

## Inspections:

Activity Date	Inspector	Inspection Description	Inspection Status
5/9/2016	Sean Birmingham	FINAL INSPECT/APPRVD	CFC ISSUED
5/4/2016	Sean Birmingham	FINAL INSPECT/APPRVD	PRE-FINAL
5/4/2016	Sean Birmingham	FINAL INSPECT/APPRVD	PRE-FINAL

## Special Inspections:

Addenda No.	Completed Date	Inspected By	Inspection Code	Description	Remarks
1	1/29/2016	MGREENE	1	CONCRETE (PLACEMENT & SAMPLING)	
1	1/29/2016	MGREENE	2	BOLTS INSTALLED IN CONCRETE	
1	1/29/2016	MGREENE	18A	BOLTS INSTALLED IN EXISTING CONCRETE	
1	1/29/2016	MGREENE	24A	FOUNDATIONS	
1	1/29/2016	MGREENE	20	HOLD-DOWNS	
1	1/29/2016	MGREENE	24E	WOOD FRAMING	
1	1/29/2016	MGREENE	19	SHEAR WALLS AND FLOOR SYSTEMS USED AS SHEAR DIAPHRAGMS	
1	1/20/2015	MGREENE	24B	STEEL FRAMING	
1	1/20/2015	MGREENE	6	HIGH-STRENGTH BOLTING	
1	1/20/2015	MGREENE	5A1	SINGLE PASS FILLET WELDS < 5/16"	

Final inspections approved;  
Certificate of Final Completion issued

Structural inspections completed  
prior to final sign-off

Request to approve legalizing  
2 existing illegal units.

Permit finalized following  
inspection approval

## Key Inspections and Final Approval:

1/20/2015: Steel framing inspection approved

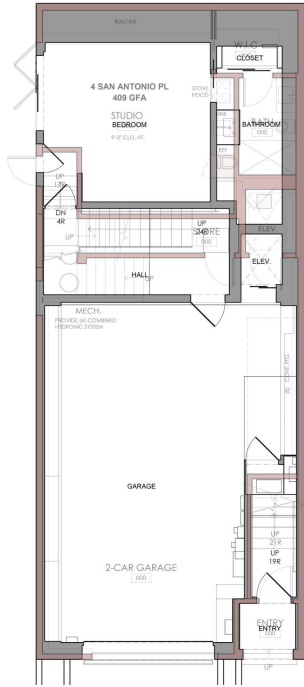
1/29/2016: Foundations, wood framing, and shear wall inspections approved

5/9/2016: Certificate of Final Completion issued

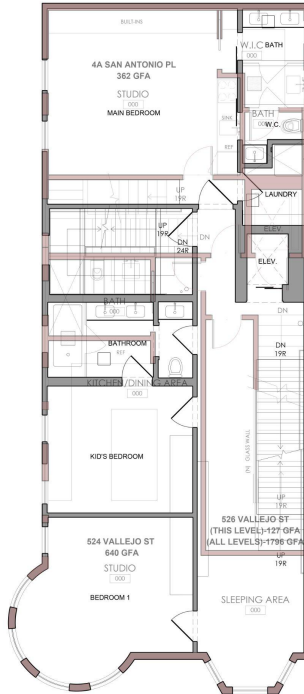
The Certificate of Final Completion reflects the condition of the building as constructed and inspected.

# Approved 2013 Plans Compared to As-Built Configuration

Approved 2013 four-unit plans overlaid with 2017 MLS images and confirmed by 2024 as-built drawings



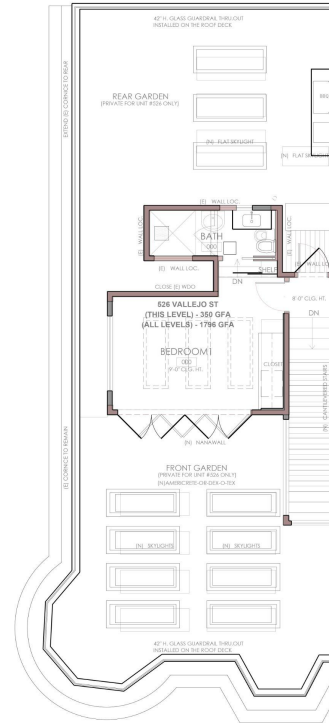
First Floor



Second Floor



Third Floor



Fourth Floor

## Architectural Comparison

- No fire-rated separation between egress paths and living spaces
- Load-bearing wall locations differ from approved plans
- Elevator shaft location and dimensions differ
- Open internal stairwell connecting floors
- Single kitchen serving multiple floors
- Bathroom and laundry layouts differ from approved plans
- Rear stair configuration differs from approved plans

Differences shown are structural and spatial in nature, not cosmetic.

# Relevant Planning Commission Precedent: 1090 Randolph Street

Commission approved legalization based on verified as-built conditions. Included for precedent and policy consistency; factual parallels noted.



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- Approved plans differed from long-standing as-built condition
- Commission relied on verified physical configuration
- Project advanced a feasible compliance pathway
- **Result:** approval of a two-unit configuration

The Randolph Street decision confirms that where approved plans were never constructed, the Commission may approve a feasible, as-built–based solution that legalizes real housing.

## Basis for Recommendation

The Department finds that the Project is, on balance, consistent with the Objectives and Policies of the General Plan. Although the Project would reduce the number of authorized Dwelling Units on the Site, it would result in a de facto addition of a high-quality family-sized unit. In addition, it would legalize a long-standing Religious Institution use that is compatible in nature with the residential community and adds to the social and cultural fabric of the neighborhood. The Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity.

## EXECUTIVE SUMMARY CONDITIONAL USE

HEARING DATE: JUNE 13, 2024

<b>Record No.:</b>	2022-009810CUA
<b>Project Address:</b>	1060-1090 Randolph Street
<b>Zoning:</b>	RH-2 (Residential – House, Two Family) Zoning District 40-X Height and Bulk District Oceanview Large Residence Special Use District Priority Equity Geographies Special Use District
<b>Cultural District:</b>	N/A
<b>Block/Lot:</b>	7081A / 032 and 033
<b>Project Sponsor:</b>	David Locicero 2340 Powell Street #290 Emeryville, CA 94608
<b>Property Owner:</b>	Khaniqah Nimatullahi 4021 19 <sup>th</sup> Avenue San Francisco, CA 94132
<b>Staff Contact:</b>	Maggie Laush – (628) 652-7339 Maggie.Laush@sfgov.org
<b>Environmental Review:</b>	Categorical Exemption

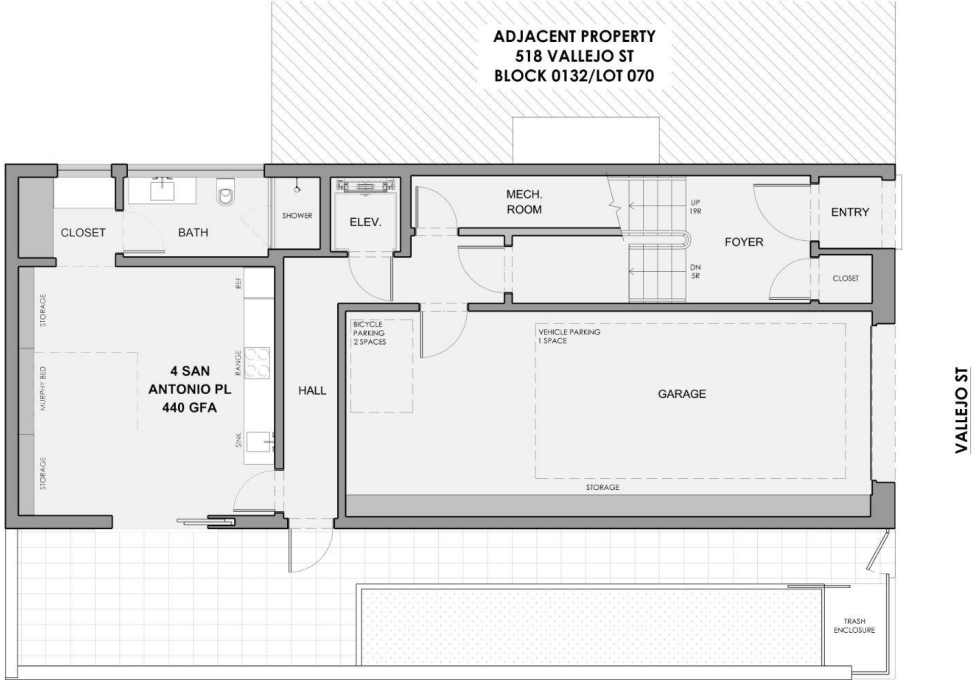
**Recommendation:** Approval with Conditions

### Project Description

The Project proposes to legalize an existing meditation center at 1060 and 1090 Randolph Street, d.b.a. Khaniqah Nimatullahi Meditation Center, comprising two residential properties that are used for congregation and communal meditation, and which are each occupied by families that are members and caretakers of the Meditation Center. Along with establishing the approximately 1,900 square-foot Religious Institution use the Project would merge two studio units, which had been removed without the benefit of permit by a prior owner, to create a two-bedroom dwelling unit on the ground floor at 1090 Randolph Street. The Project includes interior remodeling and legalizing a 54-square-foot side addition at 1090 Randolph Street.

# The Proposal: A Real, Livable Second Unit — Built Within the Existing Structure

Family home above + new 440 sq ft rent-controlled studio below.



# EXHIBIT D

## Architectural Evidence Demonstrating Material Divergence Between Approved Plans and As-Built Condition

524 Vallejo Street – Conditional Use Authorization Appeal


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This exhibit presents architectural evidence illustrating the material divergence between the four-unit configuration approved on paper during the prior developer's project and the as-built condition of the property as completed, inspected, and occupied.

The materials include approved plans, as-built documentation, and professional analysis prepared by Appellants' architect, Stephen Sutro. As shown, the differences between the approved plans and the constructed building are not minor or cosmetic, but fundamental in nature, involving circulation, structure, life-safety systems, and unit configuration.

From an architectural and construction standpoint, the as-built condition documented in 2016 and reflected in subsequent MLS records could not have been achieved through minor alterations to a completed four-unit building. Rather, the evidence demonstrates that the approved four-unit configuration was never constructed, and that the building was completed and delivered in a materially different form.

This exhibit is submitted to document those architectural realities and to provide professional context for why reinstating the approved plans would require extensive reconstruction incompatible with the existing structure.

- File attached below  EXHIBIT D: Architectural Evidence Demonstrating Material Divergence...
-

# EXHIBIT E

## Timeline of Property History

### 524 Vallejo Street – Conditional Use Authorization Appeal

---

This timeline summarizes the documented history of 524 Vallejo Street with respect to **legal unit status, construction activity, occupancy, and ownership**. It demonstrates that while a four-unit configuration was approved on paper in 2013, it was **never constructed, never occupied, and never added to San Francisco's housing stock**.

---

### Pre-2010: Historical Configuration

- Originally built in 1907, the building was historically configured and legally recognized as a **two-unit residential property**, consistent with early City records.
  - At an unknown date, additional dwelling spaces were created **without permits or legal authorization**, resulting in periods of informal or unauthorized occupancy.
  - **Only two units were legally recognized** prior to redevelopment.
- 

### 2010: Developer Acquisition

- **Purchaser:** Peter Iskandar (developer).
  - **Developer Associations:**
    - Peter Iskandar; SP Twin Boys Corporation; SF Affordable Housing LLC; Ichi Nuts, LLC; Bubble Real Estate / Master Builders (contractor)
  - **Occupancy at acquisition:**
    - 3 of the 4 dwelling spaces occupied, including units without legal authorization.
  - **Tenant resolution:**
    - Existing tenants were vacated through buyout agreements (approximately \$35,000 per unit).
    - These matters were resolved at that time and **predate Appellants' ownership by more than a decade**.
-

## 2013: Paper Approval for Four Units

- City approvals were granted to legalize two additional units, resulting in **approved plans for a four-unit building**.
  - **Critical fact:**
    - There is no evidence found or presented by the Appellants, Planning Department, Planning Commission, or opponents that the approved four-unit configuration **was ever constructed**. It existed **only on paper**.
- 

## 2014–2016: Construction and Final Inspection

- Substantial construction work completed, including foundations, framing, and shear walls.
  - **May 9, 2016:**
    - The Department of Building Inspection issued a **Certificate of Final Completion (CFC)**.
  - **As-built condition certified by the CFC:**
    - One continuous residential layout
    - One kitchen
    - Unified internal circulation
    - **No physical separation into four dwelling units**
- 

## 2017: First Arms-Length Sale

- Property sold in an arm's-length transaction to Roumana LLC, which purchased and occupied the building in its as-built condition as a single-family residence
  - **Marketing and due diligence:**
    - MLS listed the property as a **single-family residence**
    - Floor plans depict a single, continuous home
    - Lender inspections completed
  - **No City enforcement action** or requirement to reinstate four units.
  - Physical condition matched the **2016 as-built certification**.
- 

## 2017–2021: Continuous Single-Family Use

- Property continuously occupied and used as a **single-family home**.
- No construction, subdivision, or reconfiguration into multiple units.
- No enforcement actions.

---

## 2021: Appellants' Purchase

- **Purchasers:** Katelin Holloway and Ben Ramirez.
- **Disclosure:** While the Property was disclosed as having a multi-unit designation, neither the marketing materials, physical configuration of the building, nor the City's prior issuance of a Certificate of Final Completion suggested that compliance would require reconstructing a four-unit configuration that had never been built and that materially diverged from the as-built condition.
- **Physical condition at purchase:**
  - Identical to the 2017 condition
  - Single kitchen and unified circulation
- **Reasonable reliance based on:**
  - Two prior arms-length sales
  - City-issued Certificate of Final Completion
  - MLS marketing and inspections

---

## 2022: Discovery of Record Discrepancy

- An anonymous complaint triggered City review.
- Appellants learned for the first time of the discrepancy between:
  - The **2013 approved plans (never built)**, and
  - The **certified as-built condition**

---

## 2022–2024: Good-Faith Compliance Efforts

- Appellants retained legal, architectural, and expediting professionals.
- Extensive investigation undertaken to reconcile decades of inconsistent City records.
- Reinstatement of four units was studied and determined to be:
  - Physically infeasible
  - Disproportionate
  - Incompatible with the existing structure

---

## 2024: Conditional Use Authorization Application

- Appellants submitted a CUA application proposing:
  - Legalization of a **two-unit configuration**

- Creation of a new **440 sq. ft. rent-controlled studio**
  - Proposal aligned with:
    - The as-built condition
    - Housing policy objectives
    - Recent Planning Commission precedent
- 

## **December 4, 2025: Planning Commission Hearing**

- The Planning Commission held a duly noticed public hearing.
  - Extensive evidence presented regarding:
    - The as-built condition
    - Architectural feasibility
    - Public benefits
  - Result: **3–3 tie vote**, resulting in **procedural denial**, not a merits-based determination.
- 

## **Present**

- Appellants continue to reside in the home with their children.
  - Appeal filed seeking a **feasible, proportional, and policy-aligned resolution**.
- 

## **Key Takeaway**

At no point since the **2016 Certificate of Final Completion** has 524 Vallejo Street existed as a four-unit building in physical reality. The four-unit configuration was approved on paper, never built, never occupied, and never contributed housing to the City. The proposed project corrects this long-standing discrepancy by legalizing the actual structure and adding real, rent-controlled housing.

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# EXHIBIT F

## Planning Staff and Commission Acknowledgments Demonstrating Density Nonconformity, Long-Standing Vacancy, Feasibility Constraints, and the Need for a Proportional Resolution

524 Vallejo Street – Conditional Use Authorization Appeal

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This Exhibit compiles key acknowledgments from the Planning Department staff report and the Planning Commission hearing record that are relevant to the Board of Supervisors' review. Together, these materials demonstrate that (i) four dwelling units are legally nonconforming on this site under current Planning Code; (ii) the units at issue have not housed tenants for more than a decade and were vacated through buyouts; and (iii) both staff and Commissioners recognized the unusual, infeasible, and disproportionate nature of reinstating a four-unit configuration that was never constructed. These statements demonstrate that the Planning Commission's tie vote was not grounded in a finding that four units are physically viable, but rather reflects unresolved tension between paper approvals and the as-built condition.

---

### I. Planning Staff Acknowledgment of Density Nonconformity

The staff report expressly acknowledges that **four dwelling units exceed what the subject lot is permitted to support** under current Planning Code:

*“With four legal dwelling units, the subject property’s authorized density is legal nonconforming because the subject lot’s area (1,926.25 square-feet) is less than four-times 1,067 square-feet.” (Staff Report, p.3)*

**Relevance:** As Planning staff acknowledge, **four units are not permitted by right on this site and persist only as a legacy legal nonconforming condition** due to lot size constraints under the RM-1 Zoning District. Staff expressly recognized that the as-built structure cannot reasonably accommodate four units, confirming that reinstatement is not a simple compliance matter but would require fundamental reconstruction.

---

### II. Planning Staff Acknowledgment That Reducing Unit Count Restores Compliance

The staff report further states:

*“However, because the proposal would result in a net reduction to the total number of units, **the Project complies with the land use controls of the RM-1 Zoning District.**” (Staff Report, p.3)*

**Relevance:** This acknowledgment confirms that reducing the number of units — rather than reinstating all four — is what brings the Property into compliance with current zoning controls. Additionally, it confirms that the four-unit condition persists only as a legacy, legally nonconforming artifact.

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### **III. Staff Acknowledgment of the Property’s Long-Standing As-Built Condition**

The staff report also confirms that the building has functioned as a single dwelling for many years, notwithstanding the four-unit authorization on paper:

*“At some point between 2016 and 2022, all of the units were merged without authorization, and the subject property has been functioning as a single-family dwelling ever since.” (Staff Report, p.2)*

**Relevance:** This acknowledgment confirms that the City understands the distinction between **what was approved on paper** and **what actually exists**, and that the as-built condition is long-standing rather than recent or opportunistic. This acknowledgment aligns with the documented as-built condition reflected in City approvals, MLS listings, lender inspections, and occupancy history. Appellant’s Exhibits C & D prove further that this merger happened pre-2017, long before appellant’s purchased the home.

---

### **IV. Staff Findings Regarding Long-Standing Vacancy and Lack of Tenant Displacement**

The staff report confirms that the units proposed for removal have not been occupied by tenants for more than a decade:

*“The units proposed for removal, 524 Vallejo Street and 4A San Antonio Place, were last occupied by tenants in 2012, as confirmed per the Voter Rolls.” (Staff Report, p.5)*

**Relevance:** Thus, the record establishes that:

- No tenants have resided in the subject units since 2012;
  - The units have not contributed to the City’s active rental housing supply for over ten years; and
  - No current or recent tenant displacement would result from the proposed project.
- 

### **V. Record Evidence of Tenant Buyouts Resolving Prior Occupancies**

The administrative record further reflects that former tenants vacated the property through buyout agreements entered into by the prior developer more than a decade ago.

As referenced in tenant correspondence submitted in opposition to the project and corroborated by publicly available City tenant buyout records, the former tenants received buyout compensation in connection with their departure from the building. Public records indicate buyout payments in the approximate amount of \$35,000 per unit.

These buyouts:

- Occurred long before Appellants' ownership;
- Fully resolved the tenancies at issue; and
- Confirm that the units have not served as tenant housing for many years.

Appellants were not involved in, aware of, or connected to these buyouts or the former tenancies.

(Source: <https://data.sfgov.org/Housing-and-Buildings/Map-of-Buyout-Agreements/aa2m-ehxd> , Former Tenant Opposition Letter in December 4th hearing packet)

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## VI. Hearing Record: Recognition of Feasibility Constraints

During the Planning Commission hearing, both Planning staff and Commissioners raised and discussed concerns regarding the feasibility of reinstating a four-unit configuration within the existing building.

Commissioner questions and deliberations reflected acknowledgment that:

- The building, as constructed and occupied, differs materially from the approved four-unit plans;
- Reinstating four units would require substantial reconstruction; and
- The physical realities of the building impose meaningful constraints on what can reasonably be achieved.

**Relevance:** Staff implicitly acknowledges that reinstatement would involve major reconstruction, reinforcing that this is not a matter of restoring removed kitchens or minor interior changes. These feasibility concerns are reflected in the hearing transcript and form part of the administrative record before the Board.

(Source: *Planning Commission Hearing Transcript, December 4, 2025*)

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## VII. Hearing Record: Proportionality, Equity, and the Absence of Consensus

The Planning Commission's deliberations further reflect an acknowledgment that the circumstances presented are unusual and raise questions of proportionality and fairness.

Multiple Commissioners characterized the situation as difficult and expressed discomfort with the outcome, noting the hardship imposed on the current owner-occupants for circumstances created by a prior developer. These concerns ultimately resulted in a divided Commission unable to reach consensus on how to resolve the case.

The Conditional Use Authorization was not denied by a majority finding on the merits, but rather resulted from a 3–3 tie vote and de facto disapproval, underscoring the Commission’s lack of agreement on an appropriate resolution.

*(Source: Planning Commission Hearing Transcript and Draft Meeting Minutes, December 4, 2025)*

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## **VIII. Alignment with Feasibility-Based and Housing-Positive Policy Outcomes**

Taken together, the staff report and hearing record reflect a tension between preserving a nonconforming, paper four-unit designation and achieving a feasible, housing-positive outcome grounded in physical reality.

Planning staff acknowledged that four units exceed what the site is permitted to support under current zoning, while Commission deliberations reflected concern that forcing reinstatement would:

- Require disproportionate reconstruction;
- Produce low-quality or inefficient housing; and
- Fail to meaningfully advance the City’s housing goals.

By contrast, the proposed project moves the property toward compliance, converts long-standing paper units into a real, habitable dwelling, and avoids further displacement or disruption.

---

## **IX. Planning Staff Acknowledgment Regarding Affordable Housing and Rent Ordinance Status**

The staff report expressly states that **the proposed Project does not remove an affordable housing unit** as defined by the Planning Code:

*“The Project would not result in the removal of an affordable housing unit as defined in Planning Code Section 401.” (Staff Report, p.5)*

**Relevance:** These statements confirm that the Planning Department did not find that the Project would remove an affordable housing unit and did not determine that any unit at the Property was subject to the Rent Ordinance.

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## **X. Alignment With Feasibility-Based Policy Outcomes**

### **Staff Policy Framing:**

*The Department evaluates projects based on feasibility, livability, and consistency with adopted housing objectives.*

**Relevance:** The Appellants' proposal aligns with the very framework staff describes — creating **real, livable housing** rather than enforcing an infeasible configuration that produces no actual units.

---

## **Conclusion**

The Planning Department's own analysis and the Planning Commission's hearing record confirm that the four-unit configuration is legally nonconforming, long unoccupied, and misaligned with the physical realities of the building. The record further reflects recognition of feasibility and proportionality concerns that prevented the Commission from reaching consensus.

These acknowledgments support the conclusion that approval of the proposed two-unit project represents a reasonable, fair, and policy-aligned resolution of a long-standing discrepancy not of the Appellants' making.

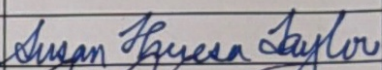
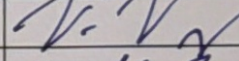
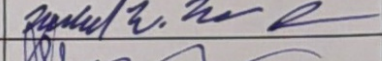
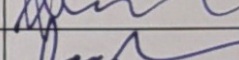
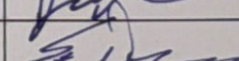
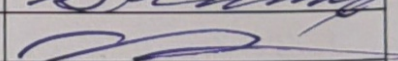
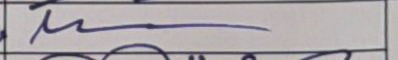
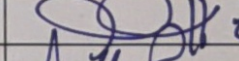
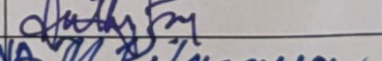
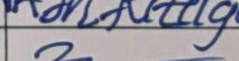
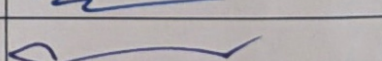
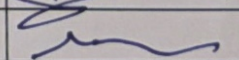
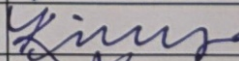
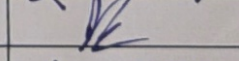
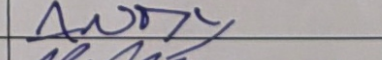
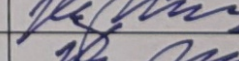
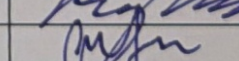
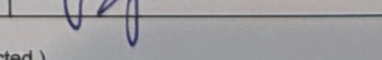

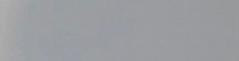
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Planning Commission Case No. 2024-011541CUA

The undersigned declare that they are hereby subscribers to this Notice of Appeal and are owners or "Verified Tenants" of property affected by the proposed amendment or conditional use (that is, owners or "Verified Tenants" of the property within the area that is the subject of the application for amendment or conditional use, or within a radius of 300 feet of the exterior boundaries of the property.

If ownership has changed and assessment roll has not been amended, we attach proof of ownership change. If signing for a firm or corporation, proof of authorization to sign on behalf of the organization is attached.

"Verified Tenants" that sign below, hereby declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct, and that the tenant occupies the entire property or at least one separate unit on the property pursuant to a lease with a term exceeding 32 days.

	Street Address, Property Owned or Rent	Assessor Block & Lot	Owner or Verified Tenant	Printed Name	Original Signature
1	536 Vallejo Street	0132/010A	Owner	Susan Taylor	
2	533 Vallejo Street	0145/039	Owner	Vincent Vigil	
3	541 Vallejo Street	0145/038	Owner	Michael Keller	
4	520 Vallejo Street	0132/070	Owner	Alexander Noor	
5	441 Greet Street	0132/042	Owner	Janna Keller	
6	1201 KEARNY	0132/055	RENTER	SEAN O'DONNELL	
7	525 Vallejo Street	0145/040	Renter	Wesley Dickinson	
8	525 Vallejo St.	0145/040	renter	Amber Heldreh-Ma	
9	506 Vallejo	0132/006	owner	Emily Hong Daniel	
10	1219 Kearny St.	0132/004	RENTER	Anthony Long	
11	7 SAN ANTONIO PL	0132/013	RENTER	MARILYN KITAGAWA	
12	1165 Kearny St	0145/001	Renter	Thomas Lau	
13	548 Vallejo St	0132/012	Renter	Sarah Goldsmith	
14	548 Vallejo St	0132/012	Renter	Matt McEwan	
15	540 Vallejo St.	0132/011	renter	Kimya Atchar	
16	1255 Kearny St	0132/001	Renter	Dishank Kethuria	
17	1223 Kearny St	0132/003	RENTER	David Morrison	
18	21 Fresno St	0145/045	OWNER	Raymond Yuen	
19	23 Fresno St	0145/046	OWNER	Raymond Yuen	
20	520 Vallejo St	0132/070	owner	Onhavi Sahni	

(All information provided is subject to public disclosure; personal information will not be redacted.)

The undersigned declare that they are hereby subscribers to this Notice of Appeal and are owners or "Verified Tenants" of property affected by the proposed amendment or conditional use (that is, owners or "Verified Tenants" of the property within the area that is the subject of the application for amendment or conditional use, or within a radius of 300 feet of the exterior boundaries of the property.

If ownership has changed and assessment roll has not been amended, we attach proof of ownership change. If signing for a firm or corporation, proof of authorization to sign on behalf of the organization is attached.

"Verified Tenants" that sign below, hereby declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct, and that the tenant occupies the entire property or at least one separate unit on the property pursuant to a lease with a term exceeding 32 days.

Street Address, property owned or rent	Assessor's Block & Lot	Owner or Verified Tenant	Printed Name	Original Signature
1. 455 VALLEJO ST	0144/035	<sup>OWNER</sup> Gina Hurley	Gina Hurley	[Signature]
2. 429 1/2 Green	0132/044	Renter Vincent Key	Vincent Key	[Signature]
3. 7 San Antonio Pl	0132/013	Renter	Ethan Loquiao	[Signature]
4. 566 Vallejo St #34	0132/046	renter	Lari	[Signature]
5. 566 Vallejo #34	0132/046	renter	Cedric Cabansan	[Signature]
6. 134 GRANT AVE	0132/028	<del>OWNER</del> <sup>RENTER</sup>	Fredo	[Signature]
7. 14 1/2 BANNAN PL	0116/010	TENANT	MANOLD MORAN	[Signature]
8. 1336 Grant Ave	0132/029	TENANT	ALFREDO VELAZO	[Signature]
9. 1398 Grant Ave	0132/051	<del>NANCY</del> <sup>NANCY</sup> <del>RENTER</del>	MONA	[Signature]
10. 453 Green	0132/040	<del>DAN</del> <sup>RENTER</sup> <del>DAN</del>	TOOTHMAN	[Signature]
11. 1 San Antonio	0132/048	Tenant	Dorie OLeary	[Signature]
12. 1 San Antonio	0132/048	Tenant	Stephanie Shepherd	[Signature]
13. 1 San Antonio	0132/048	Tenant	Eric Kline	[Signature]
14. 546 VALLEJO	0132/012	OWNER	NICHOLAS MAN	[Signature]
15.				
16.				
17.				
18.				
19.				
20.				

**From:** J B V jaime.barrett@compass.com  
**Subject:** 524 Vallejo  
**Date:** December 19, 2025 at 1:37 PM  
**To:** Ben Ramirez ben.ramirez@gmail.com, Katelin Holloway katelin.holloway@gmail.com  
**Cc:** Vince VIGIL vincevigil@sbcglobal.net



Dear Katelin and Ben,

I am writing as a neighbor across the street from 524 Vallejo Street to express my firm support for your appeal and the proposed two-unit resolution for the property.

My husband Vince and I have lived on Vallejo Street for over 20 years and are raising our daughter here. We are natives, 5th and 3rd generation here, and are profoundly invested in our home, our street, and our community in North Beach. We care deeply about the long-term stability, safety, and livability of this block, especially for families who are trying to build rooted lives in San Francisco. It is not an easy task in a city that is not very child-friendly.

From my perspective as a nearby neighbor, I believe the proposed resolution represents the most reasonable and least disruptive way to move forward. It addresses the City's housing goals while avoiding the prolonged and intensive construction that would be required under other scenarios — construction that would significantly impact the families who live on this block.

We have seen many good people, families, leave the city, and Ben and Katelin and their 2 children represent the very best in our community, and they have found themselves in a predicament not of their own doing and deserve a chance to stay in their home without being punished or pushed out because of knowledge they previously were never given or told of. Telling a family what they must do without considering their previous circumstances and disclosure of facts unknown to them should be deeply considered. They deserve that.

Furthermore, as a residential realtor not party to any of their dealings, I can say that they massively deserve a chance at a solution not detrimental to their family and community, as in my professional opinion, they were not given the REQUIRED legal disclosure to have proper knowledge of the details pertinent to their Mak home's history when they purchased it.

Just as importantly, this outcome allows a family that is deeply invested in the neighborhood to remain in their home and continue contributing to the community. As someone raising a child here, I believe it matters how the City treats families who engage transparently and responsibly in complex situations like this one, especially when raising children in San Francisco can be a massively difficult feat at times.

For these reasons, I support your appeal and the proposed two-unit solution.

Please include this letter as part of your appeal submission.

Sincerely,  
Jamie Barrett Vigil  
533 Vallejo Street

**From:** Janna Keller jannamkeller@gmail.com  
**Subject:** Support for Appeal – 524 Vallejo Street  
**Date:** December 19, 2025 at 1:32 PM  
**To:** Katelin Holloway katelin.holloway@gmail.com, Ben Ramirez ben.ramirez@gmail.com  
**Cc:** Mike Keller Mwkeller27@gmail.com

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Dear Katelin and Ben,

I am writing as a neighbor across the street from 524 Vallejo Street to express my support for your appeal and the proposed two-unit resolution.

As a parent raising young children in this neighborhood, I care deeply about stability, livability, and keeping families rooted in San Francisco. I believe the proposed resolution is the most reasonable and least disruptive way to move forward, both for the families who live on this block and for the neighborhood as a whole.

This outcome allows a family to remain in their home while resolving a complex situation in a thoughtful and proportional way. From my perspective as a nearby neighbor and parent, this is the right path forward.

Please include this letter as part of your appeal submission.

Warmly,  
Janna & Mike Keller  
541 VALLEJO ST

**From:** Susan Taylor stheresat@gmail.com

**Subject:** The appeal

**Date:** December 19, 2025 at 5:03 PM

**To:** Katelin Holloway katelin.holloway@gmail.com, Ben Ramirez ben.ramirez@gmail.com



Dear Katelin and Ben,

I am writing as your next door neighbor to express my support for your appeal and for the proposed two-unit resolution for your home at 524 Vallejo Street.

Over the years you have lived here, I have come to truly value our relationship as neighbors. I very much admire the care and consideration you bring to those of us lucky enough to live on this block of Vallejo Street. Your commitment to raising your family here, and to living in and contributing to this neighborhood has been clear and consistent from the very beginning.

I understand the history of the property and that this situation stems from actions taken by a prior developer, not by you. I also understand that the proposed solution would add a small, rent-controlled unit while avoiding the extensive and disruptive construction that would be required to reinstate a four-unit configuration that was never built.

From both a neighborhood and community perspective, I believe this proposal is the most reasonable and least disruptive way to resolve the issue. I support your appeal and hope for an outcome that allows you to remain in your home to raise your family and to continue as a vital part of our neighborhood.

Please include this letter as part of your appeal submission.

Sincerely,  
Susan Taylor  
536 Vallejo Street

**From:** Dennis Wishnie dwishnie@gmail.com  
**Subject:** Support for Appeal-524 Vallejo Street  
**Date:** December 20, 2025 at 2:57 PM  
**To:** Katelin Holloway katelin.holloway@gmail.com, ben.ramirez@gmail.com

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Dear Katelin and Ben,

I am writing as a neighbor of over 50 years on Vallejo Street to express my support for your appeal regarding 524 Vallejo.

From my perspective, you have approached this situation thoughtfully, responsibly, and in good faith. It is clear that you are working through the City's process transparently and with respect for both the neighborhood and applicable requirements.

You have been engaged, considerate neighbors, and I believe the proposed resolution represents a reasonable and proportional way to address a long-standing issue while minimizing disruption to the block.

Sincerely,  
Dennis Wishnie  
438 Vallejo St.

**From:** Sean O'Donnell ukeschmaltz@yahoo.com  
**Subject:** My plea to the appeal board.  
**Date:** December 20, 2025 at 9:14 AM  
**To:** Katelin Holloway katelin.holloway@gmail.com

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Hello Katlin & Ben,

I live up the street from you folks at 1201 Kearny & Vallejo. We bought our place here over forty years ago. We've raised our kids here and one of them is returning soon to start his family here as well.

This is a rare block in North Beach as it houses older families, professionals and newly formed families wanting to be part of this unique section of homes.

I'm very grateful you two and your kids have decided to make this block your home and wish for you to remain here as long as possible.

Any support I can lend to help you resolve your appeal with the city I will most definitely endorse. You two have brought this part of our neighborhood together like no other adjacent owners have in my many years here.

With much gratitude and appreciation,

Sean O'Donnell

**From:** Trent Page trentpage76@gmail.com  
**Subject:** Support for Appeal - 524 Vallejo Street  
**Date:** December 21, 2025 at 3:31 PM  
**To:** Katelin Holloway katelin.holloway@gmail.com, Ben Ramirez ben.ramirez@gmail.com  
**Cc:** hanayoshikawa@gmail.com

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Dear Katelin and Ben,

I am writing as a neighbor and fellow parent to express my support for your appeal related to 524 Vallejo Street.

As parents raising children in this neighborhood, my family and I care deeply about whether San Francisco continues to be a place where families can put down roots, contribute, and stay. You are exactly the kind of neighbors and parents who make this community work — engaged, generous, and genuinely invested in the people around you.

I know the situation you've inherited is not one of your making. What has stood out most throughout this process is the way you've approached it: thoughtfully, collaboratively, and with care for both the neighborhood and the City's broader goals.

I believe your proposed resolution is reasonable, fair, and aligned with keeping families in San Francisco while minimizing unnecessary disruption. I hope the appeal process results in an outcome that allows you to remain in your home and continue as part of this community.

With appreciation,

Trent Page  
1321 Montgomery Street  
San Francisco, CA 94133

**From:** Chhavi Sahni sahnichhavi@gmail.com  
**Subject:** 524 Vallejo Street 2024-011561CUA Planning Commission Hearing December 4, 2025  
**Date:** November 20, 2025 at 5:56 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org  
**Bcc:** katelin.holloway@gmail.com

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Dear Mr. Page,

We are the homeowners immediately adjacent to **524 Vallejo Street** and are writing in support of our neighbors' application (Case No. 2024-011561CUA).

As relatively new homeowners ourselves, we understand how important it is to navigate San Francisco's housing and permitting landscape in a responsible way. For several years, Katelin and Ben have worked tirelessly to find a solution that supports the City's housing priorities. Their proposal adds a unit while resolving a unique situation they inherited.

As someone who works at a local non-profit, I personally know how much this family contributes to the community, especially to neighborhood youth and families. They are thoughtful, civically engaged, and always striving to do the right thing. We are lucky to have them as neighbors.

We hope the Commission will consider the clear facts of this edge case and support their pathway forward.

Sincerely,  
Chhavi Sahni and Alex Noor  
520 Vallejo St.  
San Francisco, CA 94133

**From:** Janna Keller jannamkeller@gmail.com  
**Subject:** 524 Vallejo Street 2024-011561CUA Planning Commission Hearing December 4, 2025  
**Date:** November 20, 2025 at 2:11 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org, Mike Keller mwkeller27@gmail.com  
**Bcc:** katelin.holloway@gmail.com

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Dear Mr. Page,

We are writing in support of our friends and former across-the-street neighbors at **524 Vallejo Street** (Case No. 2024-011561CUA).

We've known this family for years. Our kids have grown up together, and we've seen firsthand how invested they are in North Beach — from supporting local schools and small businesses to showing up for neighborhood families in real ways.

We recently moved from living across the street at 541 Vallejo St., San Francisco, CA 94133 to around the block on Green street, and the hardest part of that move is not seeing the joy when our kids see our neighbors (generally Ben out front cleaning) and call out to them in the morning as we walk to school.

Their proposed solution adds housing and resolves a confusing, inherited situation that they have worked on for years in good faith. It does not remove any existing units or impact anyone's housing.

We believe the City should give this rare case thoughtful review.

Warm regards,  
Janna & Mike Keller  
441 Green Street  
SF, CA 94133

**From:** Kevin Liu [kevliu@gmail.com](mailto:kevliu@gmail.com)  
**Subject:** 524 Vallejo Street / 2024-011561CUA / Planning Commission Hearing, December 4, 2025  
**Date:** November 19, 2025 at 11:18 PM  
**To:** [vincent.w.page.ii@sfgov.org](mailto:vincent.w.page.ii@sfgov.org)  
**Cc:** [jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)  
**Bcc:** [katelin.holloway@gmail.com](mailto:katelin.holloway@gmail.com)



Dear Mr. Page,

My name is Kevin Liu, a fellow resident of San Francisco (District 5). I'm writing in support of my longtime friends Ben and Katelin regarding their home at 524 Vallejo Street (Case No. 2024-011561CUA).

I've known them for almost 20 years, since we were all young professionals starting out in San Francisco. We basically grew up here together... building our careers, getting married, buying homes, having kids. This city shaped who we became, and I think we all feel like we owe something back to it.

Over the last decade, I've watched so many friends leave San Francisco. Not because they stopped loving it, but because the bureaucracy and obstacles finally wore them down. Ben and Katelin are different, they stayed. They raised their family here. They invested in their neighborhood and community. They stuck it out through some really rough years for the city.

Like them, I also chose to stay during COVID when it felt like half the city was fleeing. My wife and I are committed to raising our family here. I understand what it means to bet on San Francisco's future, even when it's hard.

Now Ben and Katelin are being asked to pay for someone else's corruption from over a decade ago. They bought this house in good faith, and they're just trying to fix the situation in a way that actually helps. Adding housing without displacing anyone, including their own family.

They could have fought this in court. They could have sold and left like so many others. Instead, they're trying to work with the City to make things right, even though none of this is their fault.

Their proposal adds a unit, eliminates nothing, and resolves an inherited mess responsibly. I'm asking you to meet their good faith effort with some fairness in return. San Francisco should be trying to keep families like this, not making their lives harder for problems they didn't create.

Thanks for your time and consideration,

Kevin Liu  
[kevliu@gmail.com](mailto:kevliu@gmail.com)  
(510) 304-8553

**Subject:** 524 Vallejo Street 2024-011561CUA Planning Commission Hearing  
December 4, 2025

Dear Mr. Page,

We are homeowners across the street from **524 Vallejo Street**, and we're writing to express our support for our neighbors' proposal in Case No. 2024-011561CUA.

We care deeply about the safety, character, and long-term stability of our block. Katelin and Ben are exactly the kind of neighbors who make North Beach a strong, family-oriented community. They look out for everyone and they actively support the neighborhood institutions that matter.

Their proposal adds a new unit and brings clarity to a complicated situation that predates their ownership. Importantly, it doesn't remove any existing housing or displace anyone — something that matters to all of us raising children here.

We have lived at 533 Vallejo Street for almost 24 years and are raising a child here. Ben and Katelin are the kindest, most thoughtful neighbors we have ever had and are a massive asset to our neighborhood. We hope that their family will be given kind and extremely reasonable consideration to their request.

We respectfully ask that the Commission give their case fair and careful review. They have been transparent, responsible, and community-minded throughout this entire process.

Sincerely,

Vince & Jaime Vigil  
533 Vallejo Street  
San Francisco, CA 94133

**From:** Mollie Jones Hennes molliejones@gmail.com  
**Subject:** Support for 524 Vallejo Street (Case No. 2024-011561CUA)  
**Date:** December 2, 2025 at 5:35 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org  
**Bcc:** katelin.holloway@gmail.com



Dear Mr. Page,

I am writing in support of the homeowners at **524 Vallejo Street** regarding Case No. **2024-011561CUA**.

I've lived in San Francisco for nearly twenty-five years, spending the majority of that time building my career, my business, and my life right here alongside Ben & Katelin. I've watched this city change, struggle, reinvent itself, and rise again. Through it all, many of the people I started out with; talented, ambitious professionals eventually left for places that made it easier to live, work, and build stability.

But some of us chose to stay. We stayed because San Francisco meant something to us. Because we believed in its potential, its communities, and its culture. And because we wanted to be part of what makes this city special.

Ben and Katelin are two of those people.

I've known them for more than two decades. We've had a weekly dinner together at North Beach Pizza for over twenty years — which should tell you everything about their commitment to this neighborhood. They built their careers here, grew their family here, and (after very hard earned success and diligent saving) were finally able to invest in their very first home here. They could have very easily taken their success and moved elsewhere. Many of our peers did. However, they chose loyalty, community, and continuity.

That's why this situation is so frustrating.

They bought their home at 524 Vallejo in good faith, with no knowledge of the developer misconduct that happened years before. An anonymous complaint triggered a violation that has sent this family into an unwarranted tailspin. Now they're being asked to clean up a mess they did not create. And instead of fighting the City or walking away, they've chosen the path that supports housing, maintains neighborhood stability, and solves the problem collaboratively.

I am familiar with the situation they inherited, and I want to be extremely clear: **this home has functioned as a single-family residence for at least the last eight years, if not more**. There were no tenants, no multi-unit use, and no signs — physical or otherwise — that the so-called "missing units" were ever real, occupied homes.

The project they are proposing is the only reasonable and responsible resolution:

- It **adds a new, high-quality housing unit** — perfect for an aging parent or a young professional
- It **removes no existing units**, because there is only one actual unit in reality.
- It **preserves a family-sized residence**, something this city claims to want to protect.
- And it **avoids a financially and structurally infeasible reconstruction** of four theoretical units that appear to have existed only on paper.

Their proposal **adds** a unit. It **removes nothing**. It corrects the record. And it allows a family who has given so much to this city, and stayed loyal to it — to remain here.

This should be a clear "yes." I respectfully ask the City to do right by them.

Sincerely,  
**Mollie Jones**  
San Francisco Resident & Small Business Owner

**From:** Trent Page trentpage76@gmail.com  
**Subject:** 524 Vallejo Street 2024-011561CUA Planning Commission Hearing December 4, 2025  
**Date:** December 1, 2025 at 1:26 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org, hanayoshikawa@gmail.com  
**Bcc:** katelin.holloway@gmail.com



Dear Mr. Page and Members of the Planning Commission,

We are writing as nearby neighbors and close family friends of the Holloway–Ramirez family to express our strong support for the proposed project at **524 Vallejo Street** (Case No. 2024-011561CUA). We respectfully encourage the Commission to approve this project as submitted.

We have known Katelin and Ben for several years, both as neighbors and as fellow parents at Garfield Elementary School, where our children attend together. In that time, we have gotten to know them not just casually, but in the way parents connected through school and neighborhood life really do: through daily drop-offs, birthdays, class events, playdates, pizza parties, and all of the small but meaningful interactions as neighbors. They are thoughtful, steady, and deeply invested in the well-being of this neighborhood and the families who live here.

From our perspective as parents raising young children in San Francisco, it has been incredibly reassuring to have neighbors like Katelin and Ben. They show up for their community, support local schools and kids, look out for the block, and bring people together rather than divide them. They are exactly the kind of long-term residents San Francisco should want to keep — people who participate, contribute, and positively impact the neighborhood around them.

We have also come to understand the situation they have inherited with their home. As neighbors who see the property regularly and have been inside their home, we know firsthand that 524 Vallejo has functioned as a single-family home for as long as we can remember. This is not a case where a family eliminated housing or reconfigured units. The home they purchased is the home they live in today — unchanged, consistent, and clearly constructed as a single unit years prior to their ownership.

Their proposed project adds a new, modest studio unit without displacing anyone and without removing any actual units. It represents a fair and reasonable solution to a situation they did not create but are working hard to correct. We also think it speaks to their values and character that rather than choose a combative approach, they proposed a thoughtful solution centered on cooperation, compliance, and contributing positively to the neighborhood's housing supply.

As parents, neighbors, and residents of North Beach, we strongly believe that approving this project is in the best interest of the community. It resolves a complicated historical issue, increases housing, preserves stability for a long-standing family, and avoids unnecessary disruption — all while honoring the City's broader goals around housing and neighborhood vitality.

We urge you to approve the project.

Sincerely,  
Hana Yoshikawa & Trent Page  
1321 Montgomery Street  
North Beach, San Francisco  
Parents at Garfield Elementary School



**From:** Susan Taylor stheresat@gmail.com  
**Subject:** 524 Vallejo Street; 2024-011561CUA; Planning Commission Hearing, December 4, 2025  
**Date:** November 20, 2025 at 4:01 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org  
**Bcc:** katelin.holloway@gmail.com

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Dear Mr. Page:

I am writing in support of my neighbors at **524 Vallejo Street** regarding their upcoming hearing on December 4th (Case No. 2024-011561CUA).

As a homeowner next door since 2011-2012, I am very familiar with both the property at issue and the neighborhood history. The situation at 524 Vallejo is highly unusual and stems from the property developer's actions predating the current owners' period of ownership. For at least the past ten years, this property has functioned as a single family residence.

The proposal of the applicants does not eliminate any existing housing. In fact, it creates a new unit, and would resolve a long-standing discrepancy that was not caused by the current owners. I have watched them work diligently and in good faith with the City for several years to find a solution that aligns with our city's housing goals while allowing them to settle their young family into our neighborhood.

Katelin and Ben are deeply rooted in North Beach, and contribute meaningfully to this community. They are a very central part of what makes this little neighborhood work so well. They have been outstanding neighbors, and they care deeply about our community. I strongly support their proposed path and encourage the City to give this edge case thoughtful consideration.

Very truly yours,

Susan Taylor  
536 Vallejo Street  
San Francisco CA 94133

**From:** Patrick Hennes prhennes@yahoo.com  
**Subject:** Support for 524 Vallejo Street (Case No. 2024-011561CUA)  
**Date:** December 2, 2025 at 3:48 PM  
**To:** vincent.w.page.ii@sfgov.org  
**Cc:** jonas.ionin@sfgov.org

PH

Dear Mr. Page and Members of the Planning Commission,

I am writing as a long-time San Francisco resident and neighbor of **524 Vallejo Street** to express my strong support for the Conditional Use Authorization before you (Case No. 2024-011561CUA). I ask that the Commission approve the project as proposed.

I know this property, its owners, and the character of this small community. For as long as I have been familiar with 524 Vallejo, it has existed and operated as a **single-family home** — exactly as it does today. This is not a case of a recent conversion, nor a situation where housing was eliminated. It is the result of decisions made by a prior developer nearly a decade ago and a long-standing paperwork discrepancy that the current owners inherited through no fault of their own.

What may not come through in the bureaucracy of this process is who Katelin and Ben actually are. They moved to San Francisco over twenty years ago with virtually nothing. Their success was hard-earned, built slowly, and never taken for granted. They live their lives with integrity, generosity, and deep compassion. They indiscriminately bring people together, building community across every dimension of their world. They are the critical glue that keeps people connected and thriving.

I remember how proud they were when they told me they had finally saved enough to buy their first home. And I also remember the shock and devastation of what happened next — being handed a violation for something they did not do, did not cause, and truly could not have known about. Unfortunately for them, they purchased this home from two high-power executives, each serving as a General Counsel to a major, publicly listed tech company. The documentation on the home was written extraordinary well and, as first time buyers, nothing seemed amiss. And yet here we are.

What has mattered most to me, however, is how they chose to respond. They could have taken a very different route — one that involved lawsuits, finger-pointing, or looking for someone to blame. Instead, **they chose the responsible path**. They have spent nearly three years working transparently, following every direction from the City, and doing everything in their power to bring their home into compliance while also aligning with San Francisco's housing goals.

Our new Mayor has said we need to “**get rid of the nonsense and focus on common sense**.” I couldn't agree more. And this project is exactly where that philosophy should apply

principles should apply.

The facts are straightforward:

- The home has been a **single-family residence** for at least eight years.
- There is **no evidence** that the additional “paper units” were ever real, occupied homes.
- Two different families have lived in the house exactly as it is today.
- The proposed project **adds a new studio unit**, while removing nothing.
- The alternative—forcing the reconstruction of four theoretical units—would be financially impossible and structurally extreme.

Approving this project is the **common-sense solution**. And importantly, Katelin and Ben are taking full accountability for addressing an issue they did not create. They are not flippers or developers. They are long-term community members who just want to live and raise their children here — exactly the kind of people San Francisco should be working to keep, not push out. The kind of people that are genuinely committed to doing what is right — not just what is easiest.

I respectfully urge the Commission to approve this project and demonstrate that our city is serious about “getting to yes” for reasonable, housing-positive, community-minded families.

Sincerely,  
Patrick Hennes

# EXHIBIT G

## Neighborhood Support and Community Input

### 524 Vallejo Street – Conditional Use Authorization Appeal

---

This Exhibit documents neighborhood understanding of and support for the proposed appeal and project at 524 Vallejo Street. Appellants engaged directly with neighbors within a 300-foot radius to explain the property's history, the current enforcement posture, and the proposed two-unit resolution.

Neighbors were informed that the proposed project would:

- Add a new rent-controlled dwelling unit;
- Avoid reinstatement of a never-built four-unit configuration;
- Minimize construction duration, noise, and disruption; and
- Allow the current family to remain in their home while resolving a long-standing regulatory discrepancy.

The materials below reflect neighbors' informed support for the appeal as a fair, feasible, and neighborhood-appropriate outcome.

---

### G-1. Appeal Support Signature Sheet

Appellants obtained signatures representing at least **20 percent of owners and tenants within a 300-foot radius**, as required for the filing of this appeal.

Due to the timing of the Planning Commission hearing and the intervening holiday period—during which many residents are traveling—Appellants elected to submit the appeal application promptly to meet the statutory deadline. Appellants anticipate submitting additional signatures and letters of support to the Clerk of the Board prior to the appeal hearing, reflecting continued neighborhood engagement and additional expressions of support.

- Initial Signature Sheet attached
- 

### G-2. New Letters of Support

This section includes letters from immediate neighbors and community members who live in close proximity to the Property and who support the proposed appeal outcome. These letters reflect neighbors' understanding of the project, their preference for a proportional and minimally disruptive resolution, and their support for adding a rent-controlled unit rather than reinstating an infeasible four-unit configuration.

- Letters of Support attached
- 

### **G-3. Previously Submitted Letters of Support**

This section includes letters of support previously submitted to the Planning Department and Planning Commission during the Conditional Use Authorization process. These letters are included here to provide continuity of community input and to demonstrate that neighborhood support for a fair and feasible resolution has been consistent throughout the review process.

- Previously Submitted Letters of Support attached
-

# EXHIBIT H

## Statement of Community Commitment, Public Contribution, and Civic Investment

### 524 Vallejo Street – Conditional Use Authorization Appeal

---

Appellants submit this statement to provide context regarding who they are, how they contribute to San Francisco, and why they have approached this matter with transparency, collaboration, and a deep sense of responsibility to the City and neighborhood they call home.

In 2025 alone, Appellants have contributed over \$100,000 across education, community services, housing stability, civic infrastructure, and public information initiatives — in addition to sustained volunteerism, small business support, and long-term economic investment in San Francisco.

---

### Roots in San Francisco and Public Service

Katelin Holloway and Ben Ramirez moved to San Francisco more than twenty-two years ago from Stockton, California with very limited resources and built their lives here through hard work, community engagement, and belief in the opportunity this city represents.

Katelin was raised by two public educators and began her own career as a public elementary school teacher, grounding her professional life in education, equity, and public service. Ben and Katelin have lived in North Beach for much of their adult lives and are now raising their two young children here. Their boys – Luca & Juno – attend public school in the neighborhood, reinforcing their family’s deep personal stake in the health, stability, and future of San Francisco’s public institutions.

---

### Supporting Children, Families, and Educational Opportunity

Appellants believe strong cities are built by investing in children, families, and equitable access to education. In 2025, they have made significant financial contributions to organizations supporting students, youth, and families across San Francisco, including:

- Garfield Elementary School
- Salesian Boys' & Girls' Club
- Community Youth Program
- Reading Partners
- College Track
- San Francisco Education Fund
- Aim High
- Junior Achievement of Northern California

These organizations serve students across income levels, neighborhoods, and life circumstances, and reflect Appellants' belief that educational opportunity should not be determined by zip code or family background.

---

## **Supporting Community Members and Neighborhood Stability**

Appellants are equally committed to supporting adults, seniors, and families navigating housing insecurity, economic hardship, or life transitions — particularly within North Beach and adjacent communities.

Their support this year includes:

- North Beach Citizens
- North Beach Neighbors
- Tel-Hi Neighborhood Center
- Chinatown Community Development Center

These organizations provide essential services ranging from housing stability and senior support to neighborhood advocacy and family services. Appellants' involvement reflects a belief that healthy neighborhoods require sustained, multi-generational care.

---

## **Cultural, Small Business, and Economic Contributions**

Beyond philanthropy, Appellants have made direct cultural and economic contributions to San Francisco.

During the COVID-19 pandemic, Ben Ramirez founded [Gorilla Arm Coffee](#), a community-driven initiative that provided free coffee to essential workers at a time of crisis. The effort received national and international media attention highlighting San Francisco's resilience, creativity, and community spirit during an extraordinarily difficult period.

Ben has also invested in and supported local small businesses, artists, and restaurateurs, contributing to the cultural vitality and economic fabric of the City. These efforts reflect a commitment to preserving the character, creativity, and local entrepreneurship that define San Francisco.



---

## Building Inclusive Companies and Local Jobs

Katelin Holloway has spent her career as an HR leader, operator, and investor building companies with a focus on diverse, inclusive, and equitable workplaces, many of them based in San Francisco.

Today, as an early-stage investor, Katelin backs San Francisco–based companies and founders, including [founders from underrepresented backgrounds](#), helping to create local jobs, expand economic opportunity, and strengthen the City’s innovation ecosystem. These investments translate into tangible employment, durable companies, and long-term economic contribution to San Francisco.

In addition, Katelin participates in broader efforts — alongside her business partner Alexis Ohanian and his wife Serena Williams — to advocate for issues such as [advocating for investment into women’s sports](#) and [supporting Paid Family Leave](#), reflecting a commitment to policies that support working families and inclusive economic participation.

---

## Commitment to a Healthy Civic and Information Ecosystem

Appellants also support organizations that strengthen the civic infrastructure necessary for informed public discourse and effective governance. In 2025, they supported:

- KQED
- Institute for Strategic Dialogue
- Meedan
- Affording America
- TechCongress

These organizations focus on factual journalism, countering disinformation, improving public policy capacity, and supporting transparent democratic institutions — values Appellants view as essential to addressing complex civic challenges, including housing.

---

## Why This Matters

Appellants are not absentee owners or speculative investors. They live at 524 Vallejo Street full-time, are raising their children in San Francisco's public schools, invest meaningfully in the City's people and institutions, and consistently seek to contribute more than they take.

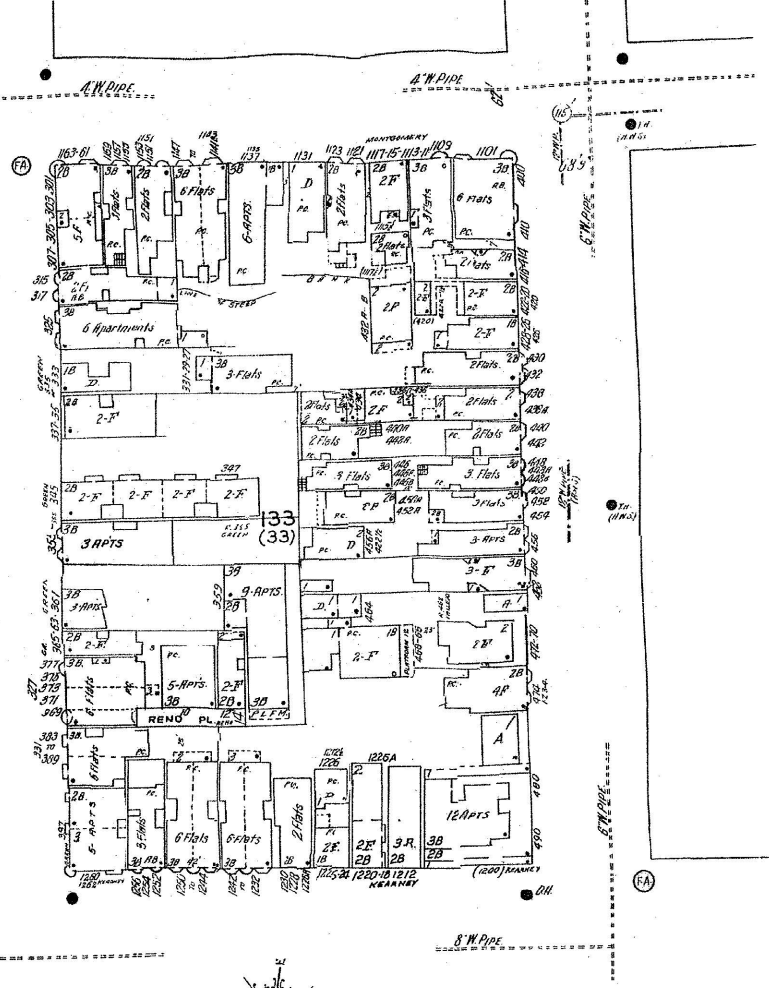
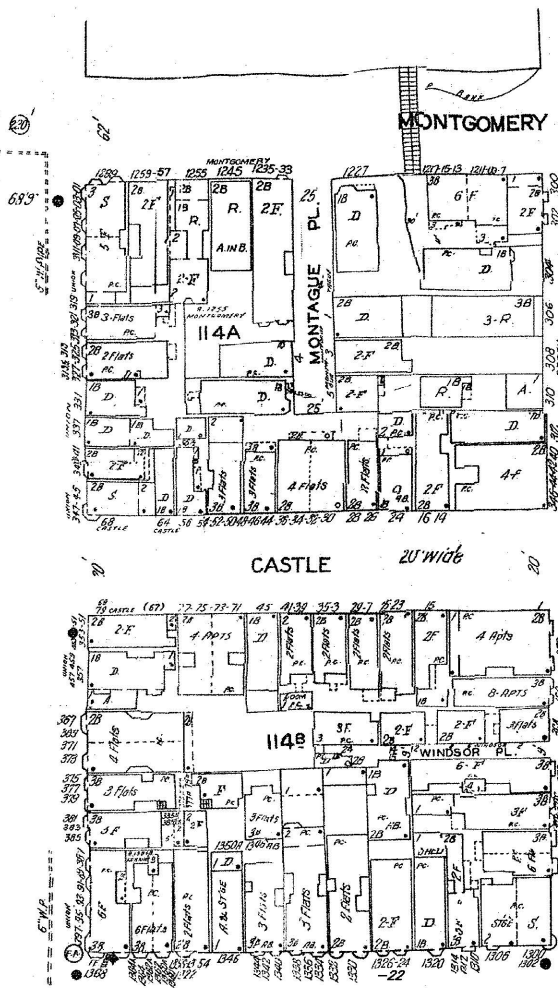
They have approached this matter **not as adversaries of the City, but as partners** — choosing transparency, compliance, and collaboration over delay or litigation. Their proposed project adds a rent-controlled housing unit, minimizes neighborhood disruption, and aligns with the City's housing, equity, and community stability goals.

San Francisco's long-term strength depends on retaining families who are deeply rooted, civically engaged, and economically invested in the City's future. Appellants respectfully submit this statement to provide context for the Board's consideration as it evaluates the appeal.



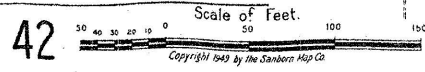
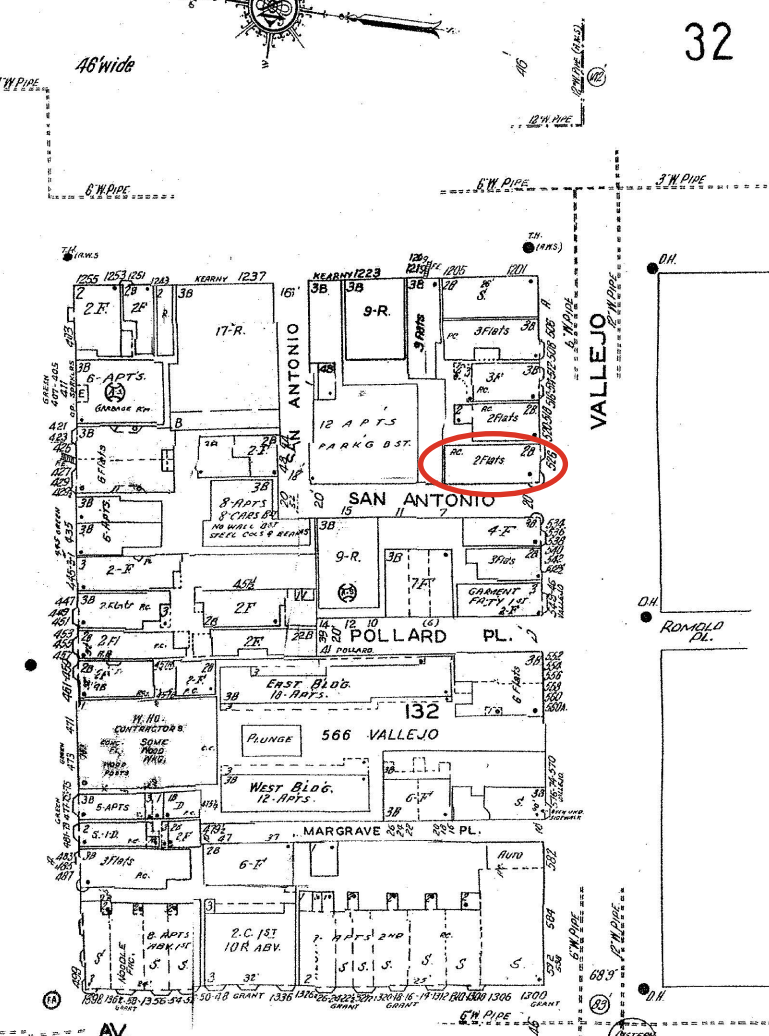
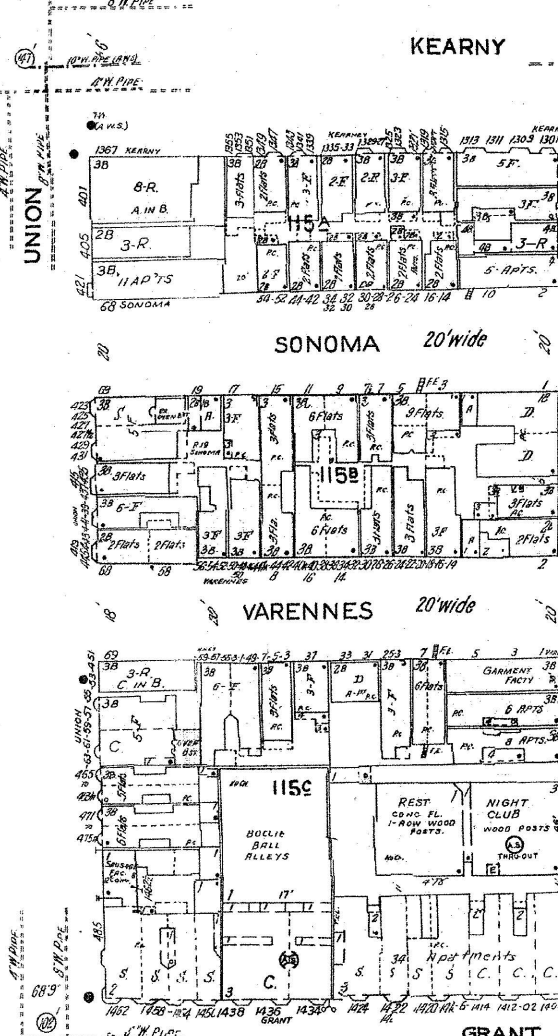
San Francisco Vol. 1  
**31**

21



30

32



42

43



PHOTO

CORRECTION RECORD				EFFEC. YEAR	APPL. YEAR	AGE	REMA. LIFE	NORMAL % GOOD	TABLE	%
EMNT NO.	FOR	AMT.	DATE							
	No record									

MARKS:

LAND DATA										
FRONT		DEPTH	AREA	ZONING	TOPOGRAPHY					
75.0	FT. x	57.50	FT. =	1926	SF.	R-4	LEVEL	GRADE	%	
DESCRIPTION		ADJUSTMENT		VALUE	SPV.	FPV.				
NER	CURB	%	STDC. DEPTH	1/6	700	1352				
DE	SIDEWALK	%	STDC. WIDTH							
	UTILITIES	%	COL. INFL.							

MARKS:

MARKET APPROACH								
ADDRESS	BLOCK	LOT	DESC.	SQ. FT.	SALES PRICE	DATE	GRM	REMARKS

INCOME ANALYSIS									
GROSS INCOME			NET INCOME				Sales History: 12-15-65 ESTATE APPR. 40,000		
Income Imputable to Personalty:			Income Imputable to Land:				Summary:		
LIFE	DEPR.	YIELD	TAX	RATE	YIELD	TAX	RATE		
YR	%	%	%	%	%	%	%		
Residual Imputable to Bldg:			Bldg. Val. \$						
LIFE	DEPR.	YIELD	TAX	METHOD	RATE/P.V.				
YR	%	%	%						
Total Income:			Land Value				ESTIMATED VALUE:		
TOTAL			TOTAL						

RECEIVED, READ AND APPROVED

DATE: 7-12-68  
SIGNATURE: [Signature]





**FINAL BUYER'S STATEMENT**

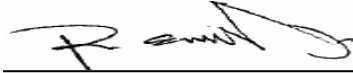
<b>Settlement Date:</b> April 12, 2021	<b>Escrow Number:</b> FWPB-3652001823
<b>Disbursement Date:</b> April 12, 2021	<b>Escrow Officer:</b> Joanne Kung
	<b>Email:</b> Joanne.Kung@CTT.com
<b>Buyer:</b> Katelin Holloway and Benjamin Ramirez, Trustees of the Holloway-Ramirez Revocable Trust dated 06/25/2020 175 Pfeiffer Street, 3 San Francisco, CA 94133	
<b>Seller:</b> Roumana LLC 2625 Alcatraz Avenue #403 Berkeley, CA 94705	
<b>Property:</b> 524-526 Vallejo Street San Francisco, CA 94133 Parcel ID(s): Lot 009, Block 0132	
<b>Lender:</b> First Republic Bank <b>Loan Number:</b> 12-07890056 <b>Loan Type:</b> Conventional Uninsured	

	\$	DEBITS	\$	CREDITS
<b>FINANCIAL CONSIDERATION</b>				
Sale Price of Property		4,858,490.00		
Deposit				146,175.00
Loan Amount	First Republic Bank			2,850,000.00
Buyers Funds to Close				1,899,703.01
<b>PRORATIONS/ADJUSTMENTS</b>				
County Taxes at \$30,747.27	04/12/21 to 07/01/21	(\$30,747.27 / 180 X 79 days)		13,494.64
<b>NEW LOAN CHARGES - First Republic Bank</b>				
<b>Total Loan Charges: \$3,371.37</b>				
Lender Credits (Includes \$205 credit for increase in Closing Costs above legal limit)	First Republic Bank			4,205.00
Courier Fee/Overnight Fee	First Republic Bank		30.00	
Document Preparation Fee-Orig	First Republic Bank		30.00	
Processing Fee	First Republic Bank		1,095.00	
Appraisal Fee	First Republic Bank		1,595.00	
Credit Report Fee	Actual Data by CBC		49.40	
Flood Certificate Fee	DataVerify Flood Services		6.00	
Insurance Monitoring Fee	SWBC		55.00	
Tax Service Fee	Lereta LLC		84.00	
Underground Storage Tank Fee	Pillar to Post, UST		345.00	
Prepaid Interest			4,286.97	
\$225.63 per day from 04/12/21 to 05/01/21				
First Republic Bank				
<b>TITLE &amp; ESCROW CHARGES</b>				
ALTA 8.1-06 - Environmental Protection Lien (CLTA 110.9-06)	Chicago Title Company		25.00	
CLTA 100-06 - Restrictions, Encroachments & Minerals	Chicago Title Company		0.00	
CLTA 116-06 - Designation of Improvements, Address	Chicago Title Company		0.00	
Title - Escrow Fee	Chicago Title Company		1,900.00	
Title - Lender's Title Insurance	Chicago Title Company		2,279.00	
Title - Loan Service Fee	Chicago Title Company		340.00	
Title - Mobile Signing Service	Sign and Date LLC		175.00	
Title - Recording Service Fee	Pasion Title Services		14.00	
Title - Owner's Title Insurance	Chicago Title Company		5,434.00	

**FINAL BUYER'S STATEMENT - Continued**

	\$	DEBITS	\$	CREDITS
Policies to be issued:				
Owners Policy				
Coverage: \$4,858,490.00	Premium: \$5,434.00	Version: ALTA Homeowner's Policy of Title Insurance 2013		
Loan Policy				
Coverage: \$2,850,000.00	Premium: \$2,279.00	Version: ALTA Loan Policy 2006		
<b>GOVERNMENT CHARGES</b>				
Recording Fees	Chicago Title Company			89.00
Deed		\$33.00		
Mortgage/Deed of Trust		\$56.00		
<b>MISCELLANEOUS CHARGES</b>				
Homeowner's Insurance Premium	Stillwater Insurance Company			
\$1,899.00 paid outside closing by Buyer				
12 months				
<b>Subtotals</b>		4,889,817.01		4,900,083.01
<b>Balance Due TO Buyer</b>		10,266.00		
<b>TOTALS</b>		4,900,083.01		4,900,083.01

**THIS IS A CERTIFIED COPY OF THE ORIGINAL DOCUMENT(S) BY  
CHICAGO TITLE COMPANY**



Chicago Title Company, Settlement Agent

**SAVE THIS STATEMENT FOR INCOME TAX PURPOSES**



524 VALLEJO ST

### Property

General information related to properties at this location.

Report for: **524 VALLEJO ST**

Parcel (Block/Lot)	Parcel History	Address(es) for this Parcel	Reports
0132/009		4a San Antonio Pl, San Francisco, CA 94133 524 Vallejo St, San Francisco, CA 94133 526 Vallejo St, San Francisco, CA 94133	Assessor Summary Assessor Recorded Documents Secured Property Tax Rolls

#### Current Planning Team

Team Manager: [xinyu.liang@sfgov.org](mailto:xinyu.liang@sfgov.org)

#### Schools (K-12) Within 600ft

None

#### Port Facilities

None

#### City Properties

None

#### Maps

- [Assessor's Block Map](#)
- [Block Map 2009](#)
- [Block Map 1980](#)
- [Block Map 1960-65](#)
- [Block Map 1946](#)
- [Block Map 1935](#)
- [Sanborn Map 1990's](#)
- [Sanborn Map 1950](#)
- [Sanborn Map 1919](#)
- [Sanborn Map 1919 2](#)
- [Sanborn Map 1913-1915](#)
- [Sanborn Map 1886-1887](#)

#### Supervisor District

District 3 (Danny Sauter)

#### Census Tract

2020 Census Tract 010600

#### Neighborhood (Planning Dept)

- North Beach
- [Neighborhood Groups Map](#)
- [Services nearby \(street cleaning, parks, MUNI, etc.\)](#)
- [Transportation \(transit, ped & bike safety, etc.\)](#)

#### Recommended Plants

Would you like to grow plants that create habitat and save water?  
Check out the plants that we would recommend for this property at [SF Plant Finder](#)

#### Housing Element Reused Sites

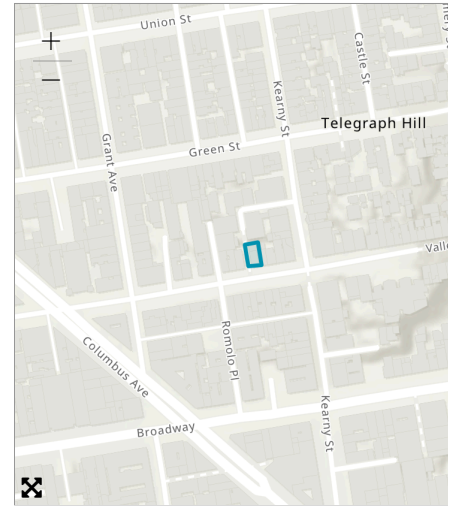
None

#### State Opportunity Map

Not within a High Resource Area

#### National Park Service

n/a



EagleView





**No Exact Match Found**

4 san antonio pl



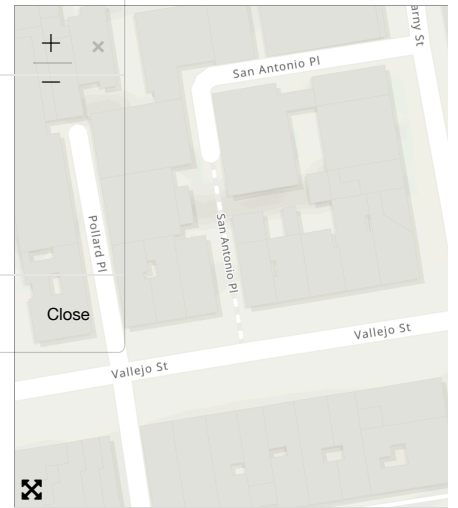
**Property**

Please select from this list of similar sounding Planning Applications:

General information related to properties at this location.

- 44 SAN ANTONIO PL - 2025-007213PRL
- 44 SAN ANTONIO PL - 2024-001441PRL
- 44 SAN ANTONIO PL - 2024-001227PRL
- 44 SAN ANTONIO PL - 2023-006140PRL

Close



EagleView



# Search & Pay

## Search

4 san antonio place



No bills or accounts matched your search. Try using different or fewer search terms. The following tips may also help:

- Make sure you are not including any owner names in your search. These are considered confidential, and are unavailable on the public site.
- Try leaving off words like drive, road, avenue, etc. For example, search for 123 Main instead of 123 Main Street.



City & County of San Francisco  
José Cisneros, Treasurer  
David Augustine, Tax Collector  
Property Tax Bill (Secured)

1 Dr. Carlton B. Goodlett Place  
City Hall, Room 140  
San Francisco, CA 94102  
www.sftreasurer.org

For Fiscal Year July 1, 2024 through June 30, 2025

Vol	Block	Lot	Bill No	Mail Date	Property Location
24	1234	123	2024012345	October 21, 2024	1234 SAN FRANCISCO ST

Assessed on January 1, 2024 at 12:01am  
To: SF TAXPAYER

**SF TAXPAYER**  
**PO BOX 123**  
**SAN FRANCISCO, CA 94110**

▶ TOTAL DUE		\$1,688.10
1st Installment	2nd Installment	
\$844.05	\$844.05	
Due 12/10/2024	Due 04/10/2025	

## Account 0132-009 — 524-526 VALLEJO ST

Address: [Parcel details](#)  
 524-526 VALLEJO ST

### Amount Due

▼ **Current Owner (April 12, 2021 - Present)**

[2025 Secured Annual Bill #20250259954](#)

Assessee: Current Owner

[Print bill \(PDF\)](#)

**1st Installment** **PAID**  
 Delinquent After \$31,622.49  
 12/10/2025 12/02/2025

**2nd Installment** Amount due: **\$31,622.49**  
 Delinquent After

04/10/2026

Add To Cart

### Account History

▼ **Current Owner (April 12, 2021 - Present)**

BILL	AMOUNT DUE	STATUS	ACTION
<a href="#">2025 Secured Annual Bill #20250259954</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$31,622.49	12/02/2025
2nd Installment	\$31,622.49	<b>Unpaid</b>	Delinquent after 04/10/2026
<a href="#">2024 Secured Annual Bill #20240262183</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$30,721.53	11/30/2024
2nd Installment	\$0.00	<b>Paid</b> \$30,688.71	02/09/2025
<a href="#">2023 Secured Annual Bill #20230267290</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$30,228.47	10/30/2023
2nd Installment	\$0.00	<b>Paid</b> \$30,228.47	04/01/2024
<a href="#">2022 Secured Annual Bill #20220460790</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$29,670.43	11/29/2022
2nd Installment	\$0.00	<b>Paid</b> \$29,670.43	03/05/2023
<b>2021</b>			
<a href="#">2021 Secured Annual Bill #20210278833</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$30,540.43	11/29/2021
2nd Installment	\$0.00	<b>Paid</b> \$30,540.43	01/03/2022
2021 Secured Supplemental Bill #20210488632			
2020 Secured Supplemental Bill #20210488631			
<b>Total Amount Due</b>	<b>\$31,622.49</b>		










▼ **Prior Owner (June 23, 2017 - April 11, 2021)**

BILL	AMOUNT DUE	STATUS	ACTION
<a href="#">2020 Secured Annual Bill #2020085265</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$30,747.27	12/02/2020
2nd Installment	\$0.00	<b>Paid</b> \$30,747.27	03/31/2021
<a href="#">2019 Secured Annual Bill #20190052320</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$29,691.07	10/15/2019
2nd Installment	\$0.00	<b>Paid</b> \$29,691.07	10/15/2019
<a href="#">2018 Secured Annual Bill #20180065530</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$28,683.67	12/07/2018
2nd Installment	\$0.00	<b>Paid</b> \$28,683.67	12/24/2018
<b>2017</b>			
<a href="#">2017 Secured Annual Bill #20170065470</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$8,582.32	10/19/2017
2nd Installment	\$0.00	<b>Paid</b> \$8,582.32	12/22/2017
<a href="#">2017 Secured Supplemental Bill #20177023242</a> ⓘ			<a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$19,616.15	11/17/2017
2nd Installment	\$0.00	<b>Paid</b> \$19,616.15	12/22/2017



Total Amount Due

\$0.00

### ▼ Prior Owner (October 12, 2010 – June 22, 2017)

BILL	AMOUNT DUE		STATUS	ACTION
<a href="#">2016 Secured Annual Bill #20160065240</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$8,420.18	11/29/2016	
2nd Installment	\$0.00	<b>Paid</b> \$8,420.18	04/10/2017	
2015				
<a href="#">2015 Secured Annual Bill #20150065070</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$5,832.92	12/07/2015	
2nd Installment	\$0.00	<b>Paid</b> \$5,832.92	03/31/2016	
<a href="#">2015 Secured Supplemental Bill #20155014102</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$2,322.27	02/05/2016	
2nd Installment	\$0.00	<b>Paid</b> \$2,322.27	03/31/2016	
<a href="#">2014 Secured Annual Bill #20140064980</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$5,680.90	12/08/2014	
2nd Installment	\$0.00	<b>Paid</b> \$5,680.90	03/31/2015	
<a href="#">2013 Secured Annual Bill #20130064700</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$5,548.59	12/06/2013	
2nd Installment	\$0.00	<b>Paid</b> \$5,548.59	04/08/2014	
<a href="#">2012 Secured Annual Bill #20120064630</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$5,320.28	12/04/2012	
2nd Installment	\$0.00	<b>Paid</b> \$5,320.28	04/09/2013	
<a href="#">2011 Secured Annual Bill #20110064510</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$5,229.00	12/05/2011	
2nd Installment	\$0.00	<b>Paid</b> \$5,229.00	04/04/2012	
2010				
<a href="#">2010 Secured Annual Bill #20100064180</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$827.91	06/06/2011	
2nd Installment	\$0.00	<b>Paid</b> \$872.91	06/06/2011	
<a href="#">2010 Secured Supplemental Bill #20100022542</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$2,975.77	03/31/2011	
2nd Installment	\$0.00	<b>Paid</b> \$2,975.77	04/08/2011	
Total Amount Due	\$0.00			

### ▼ Prior Owner (March 1, 1993 – October 11, 2010)

BILL	AMOUNT DUE		STATUS	ACTION
<a href="#">2009 Secured Annual Bill #20090063320</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$750.90	12/03/2009	
2nd Installment	\$0.00	<b>Paid</b> \$750.90	03/30/2010	
<a href="#">2008 Secured Annual Bill #20080063270</a> ⓘ				 <a href="#">Print (PDF)</a>
1st Installment	\$0.00	<b>Paid</b> \$687.34	12/08/2008	
2nd Installment	\$0.00	<b>Paid</b> \$687.34	12/08/2008	
Total Amount Due	\$0.00			

# Search & Pay

## Search

4a san antonio place



No bills or accounts matched your search. Try using different or fewer search terms. The following tips may also help:

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City & County of San Francisco  
José Cisneros, Treasurer  
David Augustine, Tax Collector  
**Property Tax Bill (Secured)**

1 Dr. Carlton B. Goodlett Place  
City Hall, Room 140  
San Francisco, CA 94102  
www.sftreasurer.org

For Fiscal Year July 1, 2024 through June 30, 2025

Vol	Block	Lot	Bill No	Mail Date	Property Location
24	1234	123	2024012345	October 21, 2024	1234 SAN FRANCISCO ST

Assessed on January 1, 2024 at 12:01am  
To: SF TAXPAYER

**SF TAXPAYER**  
**PO BOX 123**  
**SAN FRANCISCO, CA 94110**

<b>▶ TOTAL DUE</b>		<b>\$1,688.10</b>
1st Installment	2nd Installment	
\$844.05	\$844.05	
Due 12/10/2024	Due 04/10/2025	

# EXHIBIT I

## Additional Supporting Materials

### 524 Vallejo Street – Conditional Use Authorization Appeal

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This exhibit contains supplemental materials documenting the complexity of the Property's regulatory history, the Appellants' sustained good-faith compliance efforts, and the factual context relevant to the Board's review of this appeal. These materials are provided for the Board's reference.

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#### I-1. Inconsistent City Records Regarding Unit Count

Over the course of Appellants' efforts to resolve the discrepancy affecting the Property, it became apparent that City and other legal records concerning the number of dwelling units at 524 Vallejo Street have been inconsistent across departments and over time.

Depending on the source and date, the Property has been variously described as:

- a single-family residence,
- a two-unit building,
- a three-unit building, and
- a four-unit building.

These inconsistencies span multiple City systems, including Planning, DBI, and Assessor records. No single database conclusively establishes the dwelling unit count. The only authoritative confirmation of what was actually built is DBI's Certificate of Final Completion, corroborated by permit records and contemporaneous MLS documentation.

The absence of a consistent unit count significantly complicated the Appellants' ability to understand the Property's regulatory status and necessitated extensive professional investigation to reconcile conflicting records.

## Summary of Attachments

Source	Approx. Date	Unit Count Reflected	Notes
Sanborn Map (1950s)	1950s	1 unit	Historical context only
Sanborn Map (1990s)	1990s	2 units	No indication of four units
SF Assessor's Records	2010	2 units	Official assessment record
Chicago Title Report	Pre-purchase	2 units	Title relied upon at purchase
SF Property Information Map (PIM)	Current	3 units	Inconsistent with other systems
SF PIM	Current	-	Address 4 San Antonio Place does not exist
SF Tax Records	Current	2 units	Does not recognize 4 / 4A units

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## I-2. Summary of Good-Faith Compliance Efforts and Costs Incurred

Since first learning of the discrepancy between the City's records and the as-built condition of the Property, Appellants have undertaken sustained and proactive efforts to comply with City direction and resolve the issue transparently.

These efforts have included:

- retaining experienced land-use legal counsel;
- retaining licensed architectural professionals to analyze as-built conditions and feasibility;
- engaging an expeditor to coordinate with City agencies;
- preparing and submitting multiple plan sets and revisions;
- paying required City application and review fees; and
- participating in hearings and staff consultations over multiple years.

In total, Appellants have expended **substantial six-figure sums** in professional fees and City costs in connection with these efforts, in addition to dedicating significant personal time and resources. These expenditures were incurred to address a condition created by a prior developer and compounded by inconsistent City records, not by any action taken by Appellants.

This summary is provided to illustrate the seriousness and good faith with which Appellants have approached compliance, not to seek special treatment or exemption from applicable requirements.

**Years Engaged:** 2022 - 2025

**City Fees Paid to Date:** \$8,794.79

**Professionals Retained:** Architects, Land Use Counsels, Expeditor, Assessors, Engineers, etc.

**Professional Fees Incurred Between Violation Issuance to Date:** \$371,601.07

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### **I-3. Correspondence Demonstrating Cooperation and Transparency**

Throughout this process, Appellants consistently engaged with City staff in a cooperative and transparent manner. When concerns were raised, Appellants responded promptly, retained qualified professionals, revised proposals based on staff feedback, and sought guidance on how best to proceed in alignment with City policy.

Over a period now spanning over three years, Appellants participated in site visits, staff consultations, plan revisions, and formal hearings, and undertook substantial professional and City review costs in an effort to resolve the matter through established City processes.

Appellants elected to pursue compliance and resolution through Planning and the Commission, rather than litigation or delay. This exhibit references those efforts to provide context for the appeal, without reproducing extensive correspondence that is already reflected in the administrative record.

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### **Conclusion**

Exhibit I provides additional context underscoring the unusual complexity of this case and the Appellants' sustained, good-faith efforts to resolve it responsibly. When considered alongside the other exhibits, these materials further demonstrate that the proposed project represents a proportional, feasible, and policy-aligned resolution to a long-standing discrepancy not of the Appellants' making.

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