

In the Matter of City Council Member Jaynie Schultz and Congregation Ateres Israel Illegal Land Use Investigation

The information in this complaint is provided to the best of the complainant's knowledge based on facts as understood from a careful review of government records. All statements herein are submitted for investigative review and not intended as absolute statements of fact.

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Complaint Allegations

This complaint alleges that Councilwoman Jaynie Schultz used her position as a Dallas City Councilwoman to subvert an investigation by city staff into illegal land use by Congregation Ateres Israel (“CAI”), a 501(c)3 nonprofit corporation registered with and recognized by the IRS as a church under 26 U.S. Code § 170(b)(1)(a)(i), and its founder, Rabbi Benjamin Epstein.

Dallas City Code § 12A-4 (Code of Ethics)

Unfair Advancement of Private Interests

“A city official or employee may not use his or her official position to unfairly advance or impede personal interests by granting or securing, or by attempting to grant or secure, for any person (including himself or herself) any form of special consideration, treatment, exemption, or advantage beyond that which is lawfully available to every other person or organization.”

Schultz’s subversion of this investigation unfairly advanced the private interests of CAI, while impeding those of citizens affected by its bothersome and illegal activities, through the special consideration and treatment it afforded to CAI. Schultz’s intervention effectively exempts CAI from the requirements of Dallas Development Code, while countless other houses of worship in similar circumstances have been required to navigate and abide by the complexities of applying for and obtaining a Certificate of Occupancy. Avoiding this process impedes the public interest by allowing CAI to avoid inspections that ensure fire safety, handicap accessibility, and reasonable considerations for the neighborhood such as the provision of sufficient parking.

Tex. Penal Code § 36.04 (Bribery and Corrupt Influence)

Improper Influence

“(a) A person commits an offense if he privately addresses a representation, entreaty, argument, or other communication to any public servant who exercises or will exercise official discretion in an adjudicatory proceeding with an intent to influence the outcome of the proceeding on the basis of considerations other than those authorized by law. (b) For purposes of this section, “adjudicatory proceeding” means any proceeding before a court or any other agency of government in which the legal rights, powers, duties, or privileges of specified parties are determined.”

Code Compliance is an agency of government that conducts investigations to determine the rights and duties of property owners in accordance with Dallas City Code. Schultz’s May 26, 2022 email to Code Compliance staff Corey Blacksher and Seblewongel White, in which she informed them that staff was “mistaken” in their identification of this location as a synagogue, constituted “intent to influence the outcome of the proceeding on the basis of considerations

other than those authorized by law.” Schultz’s email was directly cited by the inspector, with a screenshot attached to the case file, as the reason for the reversal of the investigation’s findings.

Investigative Narrative

Corporation and Property

Congregation Ateres Israel, a 501(c)3 nonprofit corporation [Exhibit A], is the owner of a single-family residence located at 6107 Prestoncrest Lane [Exhibit B] where it provides housing to Epstein and his family, hosts weekly services and large community meals, and occasionally holds large events. Epstein advertises these weekly services on Facebook to his 2,300 “friends” as well as to the general public. These events have been observed by complainants to the city’s 311 system to include loud music at late-night hours, bounce houses that entirely obstruct public roadways, and vehicles lining both sides of the street for multiple residential blocks.

Code Compliance Investigation

On April 15, 2022, Code Compliance staff visited CAI to investigate its land use activities in response to citizen complaints. On arriving, Inspector Joseph Shelton observed a large number of cars at the location and found synagogue activities to be in progress [Exhibit C]. Shelton photographed the vehicles and synagogue activities and attached them to the case file (SR # 22-00146882). Shelton made contact with Epstein, informed him that a permit would be required to operate the synagogue, and issued a Notice of Violation for “No Building Permit” and “Illegal Land Use” [Exhibit D]. Shelton directed Epstein to resolve these issues by April 25, 2022. Shelton’s internal comments from the visit stated: “Rabbi Epstein is conducting services with large amount [sic] of people with no permit for special events or synagogue.”

Extensions and Reinspections

Inspector Shelton reinspected the property numerous times and granted multiple extensions:

- April 26, 2022: *“The property still has no permit. Inspector spoke with property owner Rabbi Epstein. He stated that he is having a hard time with obtaining a permit online. Inspector suggested that he go in person to building inspection. Extension granted.”*
- May 10, 2022: *“The property is still acting as a church with no permit.”*
- May 15, 2022: *“The property still has not gotten a permit for using the residence as a synagogue. Inspector called the Rabbi with no answer.”*

On May 16, 2022, Epstein filed a general warranty deed [Exhibit B] with the Dallas County Clerk’s Recording Division, transferring the property from his own name into that of CAI, displaying ongoing and deepening intent to operate the property as a synagogue congregation.

Epstein's claims to Inspector Shelton that he was having trouble obtaining a permit are not realistic. Records from the Dallas County Clerk's Recording Division indicate that Epstein has overseen the acquisition of dozens of properties on behalf of former employer Dallas Torah Institute (which is currently being investigated for Epstein's alleged use of falsified clergy affidavits to obtain property tax exemptions under false pretenses), while City of Dallas records demonstrate that he has a history of direct and efficient email communication and cooperation with city building and planning staff. However, Building Inspections has no record of attempts by Epstein to secure a permit during the course of this investigation as was claimed to Shelton.

Intervention in Investigation

Councilwoman Jaynie Schultz became aware of the details of this investigation on or before April 28, 2022 when Council Liaison Sophia Figueroa forwarded her an email chain among many levels of city staff detailing the ongoing status of the investigation and photographs thereof.

From: [Figueroa, Sophia](#)
To: [Schultz, Jaynie](#)
Cc: [Richards, Kimberly](#)
Subject: Code Update(6107 Preston Crest Rd) Rules for a church inside a house in Dallas
Date: Thursday, April 28, 2022 3:46:03 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

FYI – See the emails below from Code staff.

Someone reported 6107 Preston Crest Road about a church at residential location.
Code inspection was completed on Friday, April 15, 2022, no permit and illegal land use violation confirmed at 6107 Preston Crest Rd.
Staff made contact with resident Rabbi Epstein, and advised to obtain proper permit or Certificate of Occupancy using a residence as a synagogue. A re-inspection conducted on Tuesday, April 26, 2022 no application has been received/ processed.

Staff has been monitoring the location, and no evidence of synagogue/church.

Sophia

The next day, Epstein sent a copy of the Notice of Violation from the city to Aaron Ceder, Chief of Staff to Dallas County Commissioner J.J. Koch, with the subject, “Can you help me on this?” Ceder called Schultz to discuss the matter, though their conversation did not generate records. (Epstein, Ceder, and Schultz are all members of the same small religious community and are personally acquainted with one another.) Following that call, Schultz replied to Figueroa’s email.

From: [Rabbi Bentzi & Batva Epstein](#)
To: [Aaron Ceder; Aaron Ceder](#)
Subject: [External Sender] Can you help me on this?
Date: Friday, April 29, 2022 2:16:26 AM

From: [Schultz, Jaynie](#)
To: [Figueroa, Sophia](#)
Cc: [Richards, Kimberly](#)
Subject: RE: Code Update(6107 Preston Crest Rd) Rules for a church inside a house in Dallas
Date: Saturday, April 30, 2022 7:12:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

I got a call from Aaron Ceder, Chief of Staff for JJ Koch.
He's looking into it.

Jaynie

August 2022

As Code Enforcement follow-ups continued, rather than attempt to procure the necessary permit, Epstein awaited outside intervention and followed up with Ceder again on May 24, 2022:

From: Rabbi Bentzi & Batya Epstein [REDACTED]
Sent: Tuesday, May 24, 2022 5:08 PM
To: Aaron Ceder <Aaron.Ceder@dallascounty.org>
Subject: [External Sender]Re: Can you help me on this?

Aaron,
Do you know where we are holding with this?
Thank you so much for all your help!

[Sent from AT&T Yahoo Mail on Android](#)

From: Aaron Ceder
Sent: Wednesday, May 25, 2022 7:31 AM
To: Rabbi Bentzi & Batya Epstein
Subject: RE: [External Sender]Re: Can you help me on this?

Let me follow up. I know Councilwoman Schultz said she was arranging a meeting between you and the Compliance Department.

From: Aaron Ceder <Aaron.Ceder@dallascounty.org>
Sent: Thursday, May 26, 2022 8:46 AM
To: Schultz, Jaynie <jaynie.schultz@dallascityhall.com>
Subject: FW: [External Sender]Re: Can you help me on this?

External Email

Councilwoman,

I hope all is well. Just following up if there is a meeting scheduled between Rabbi Epstein and City Code Compliance.

Best,

Aaron Ceder
Chief of Staff
Dallas County, District 2
J.J. Koch, Commissioner
(Office) 214-653-6511
(Cell) 214-649-1825

Aaron.Ceder@dallascounty.org

From: Schultz, Jaynie <jaynie.schultz@dallascityhall.com>
Sent: Thursday, May 26, 2022 8:54 AM
To: Aaron Ceder
Subject: RE: [External Sender]Re: Can you help me on this?

This is my fault.
I'm on it.

Thank you,
Jaynie

Schultz subsequently contacted Code Enforcement, informing them that they had been “mistaken” in their investigative findings and recasting CAI’s activities as “private gatherings” for which Code Compliance would “explain the rules” rather than enforce permitting requirements.

From: Schultz, Jaynie <jaynie.schultz@dallascityhall.com>
Sent: Thursday, May 26, 2022 8:53:34 AM
To: Blacksher, Corey <corey.blacksher@dallas.gov>; White, Seblewongel <Seblewongel.White@dallas.gov>
Cc: Figueroa, Sophia <sophia.figueroa@dallascityhall.com>
Subject: FW: [External Sender]Re: Can you help me on this?

Dear Mr. Blacksher and Ms. White,

I am hoping you can help me with something.
One of my constituents received the notice below.
They are part of a Jewish outreach group that often hosts meals in their home.
They are not hosting events but have been mistaken for a special events and synagogue location.
Would you be willing to reach out to them and explain the rules for private gatherings?

Please let me know if you have any questions.

Thank you so much,

Jaynie

Schultz’s assertion that this is not a synagogue location is materially incorrect, which was known to her based on the April 28th email she received detailing the investigative history. As

previously noted, Congregation Ateres Israel is a 501(c)3 nonprofit corporation, has applied to the IRS for income tax exemption as a place of worship, holds title to the property in question, publicly advertises its weekly services, and was directly observed and photographed by Code Compliance holding synagogue activities.

Reversal of Investigative Findings

On May 27, 2022, after having personally investigated CAI, confirmed that it was operating a synagogue in the residence, and followed up repeatedly with Epstein while he claimed to be working on procuring a permit, Inspector Shelton closed the case file. His comments indicated:

Rabbi Epstein has established with Council woman [sic] Schultz that he is not conduct [sic] the residence as a synagogue. The property is in compliance with the city of Dallas. Rabbi Epstein is not conducting the residence as a synagogue. He has met with Council member Schultz to plead his case.

Code Compliance Follow-Up and Aftermath

Although the proposed alternative to complying with City Code was to frame these synagogue activities as “private gatherings” and ask Code Compliance to meet with Epstein to ensure his understanding of the rules, it does not seem that any such meeting ever occurred nor that Schultz made a good faith effort to ensure implementation of the resolution she orchestrated.

From: White, Seblewongel <Seblewongel.White@dallas.gov>
Sent: Thursday, May 26, 2022 11:01 AM
To: Schultz, Jaynie <jaynie.schultz@dallascityhall.com>; Blacksher, Corey
Cc: Figueroa, Sophia <sophia.figueroa@dallascityhall.com>
Subject: Re: [External Sender]Re: Can you help me on this?

Yes ma'am, I will do that,
 Thank you,
 Sincerely,

Seblewongel White
 Neighborhood Code Representative
 City of Dallas | DallasCityNews.net
 Department of Code Compliance
 North Central District
 7901 Goforth Rd.
 Dallas, TX 75220
 C: 214.601.6541
seblewongel.white@dallas.gov

On May 26, 2022, at 3:25 PM, White, Seblewongel <Seblewongel.White@dallas.gov> wrote:

Good afternoon Ma'am,
 I went to 6107 PrestonCrest, but no one was home at the time, I left my business card to call me ,
 I also sent email to [REDACTED] requesting a response to talk about the concerns,
 I will keep you updated as soon as I hear back,
 Thank you,
 Sincerely,

Seblewongel White
 Neighborhood Code Representative
 City of Dallas | DallasCityNews.net
 Department of Code Compliance
 North Central District
 7901 Goforth Rd.
 Dallas, TX 75220
 C: 214.601.6541
seblewongel.white@dallas.gov

From: White, Seblewongel
To: [REDACTED]
Cc: Rosales, Roberto; Blacksher, Corey
Subject: Re-concern at 6107 PrestonCrest
Date: Thursday, May 26, 2022 1:23:21 PM

Good afternoon,
 Could you please call me on my cell number below to discuss the concern we have?
 Thank you & have a great day ,
 Sincerley,

Seblewongel White
 Neighborhood Code Representative
 City of Dallas | DallasCityNews.net
 Department of Code Compliance
 North Central District

From: Schultz, Jaynie
To: White, Seblewongel
Cc: Blacksher, Corey; Figueroa, Sophia; Aaron Cedar
Subject: Re: [External Sender]Re: Can you help me on this?
Date: Thursday, May 26, 2022 8:21:44 PM
Attachments: [image007.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Excellent.

Thank you so much,
 Jaynie

Jaynie Schultz
 City Council, District 11
 214-405-1429

Over the ensuing month, synagogue activity continued unabated while citizen complaints continued across several emails to city staff [Exhibit F]. Despite attempts to contact staff at Code Compliance, City Manager, and City Council, the only response came from Inspector Shelton on June 6th and echoed the resolution put forth by Schultz:

On Monday, June 6th, 2022 at 5:19 PM, Shelton, Joseph <joseph.shelton@dallas.gov> wrote:

Hello Mr. Jónsson,

Citizens are allowed to have gatherings at their homes.

Joseph Shelton
Inspector II
City of Dallas | DallasCityNews.net
Department of Code Compliance
7901 Goforth
Dallas, TX 75238
C: 214.846.8190
joseph.shelton@dallascityhall.com

The citizen proceeded to send additional emails and submit further documentation indicating that this was in fact a synagogue, including the general warranty deed indicating that Epstein had in fact transferred title to the house to the synagogue's corporate entity in May 2022 during the course of this investigation.

From: Guðrún Jónsson <[REDACTED]>
Date: July 1, 2022 at 3:34:23 AM GMT+2
To: "Simpson, Carl" <carl.simpson@dallas.gov>, "Broadnax Jr, TC" <TC.Broadnax@dallas.gov>, "Shelton, Joseph" <joseph.shelton@dallas.gov>, "Schultz, Jaynie" <jaynie.schultz@dallas.gov>, "Atkins, Tennell" <tennell.atkins@dallas.gov>, "Johnson, Eric" <eric.johnson@dallas.gov>, "Bazaldua, Adam" <adam.bazaldua@dallas.gov>, "Soto, Richard" <richard.soto@dallas.gov>, [REDACTED], sgrigsby@dallasnews.com
Subject: Re: city council intervention
Reply-To: Guðrún Jónsson <[REDACTED]>

External Email!

at same time as Epstein is tell jaynie it is not a church, he actually have the house deed title change to a church congregation name

it is so crazy

Schultz subsequently followed up with Epstein to inquire as to whether he had met with his neighbors and asked him to "rectify the situation". There were some further discussions about whether he had met with Code Compliance, but no indication from either Epstein nor Code Compliance that a discussion about the rules ever took place as directed.

From: [Schultz, Jaynie](#)
To: [Bentzi Epstein](#)
Cc: [Aaron Ceder](#)
Subject: [External Sender]Fwd: city council intervention
Date: Friday, July 1, 2022 2:16:12 AM
Attachments: [20220516 transfer 6107 to CAI.pdf](#)

Hi Rabbi Epstein,

Have you met with your neighbors? Please rectify this situation.

Thank you,
Jaynie

Jaynie Schultz
City Council, District 11
214-405-1429

On Fri, Jul 1, 2022 at 3:15 AM, Schultz, Jaynie <jaynie.schultz@dallas.gov> wrote:

Ok, please be sure that you follow all code rules. You met with them to fully understand, right?

Thank you,
Jaynie

Jaynie Schultz
City Council, District 11
214-405-1429

On Jul 1, 2022, at 10:09 AM, Rabbi Bentzi & Batya Epstein <[REDACTED]> wrote:

External Email!

This guy also has been asking DATA for our members list...
He made a 20 dollar donation a few months ago, and then has started to harass DATA...
I have no clue who this guy is...

[Sent from AT&T Yahoo Mail on Android](#)

From: [Rabbi Bentzi & Batya Epstein](#)
To: [Schultz, Jaynie](#)
Cc: [Aaron Ceder](#)
Subject: [External Sender]Re: city council intervention
Date: Friday, July 1, 2022 3:32:23 AM

As far as I know, I'm doing everything legal. We would never want to break any laws.
Thank you for helping us follow all the codes properly.

[Sent from AT&T Yahoo Mail on Android](#)

Conclusion

There is no reasonable basis for the decision by Schultz to overrule the judgment of Code Compliance staff in concluding that the property is not being used as a synagogue when it:

- Is owned by a corporation whose name begins with “Congregation” – defined by Oxford Languages as “a group of people assembled for religious worship” – and which is recognized by the IRS as a public charity under 26 U.S. Code § 170(b)(1)(a)(i), which is exclusively reserved for churches or conventions thereof,
- Is inhabited by a rabbi who advertises his weekly services to thousands of people,
- contains a permanent 18’ x 36’ tent in the backyard with dozens of tables and chairs,
- and was observed and photographed by a trained Code Compliance inspector to be functioning as a synagogue.

Dallas Development Code exists for the purpose of “promoting the health, safety, morals, and general welfare of the city.” By exceeding her authority and exerting improper influence to subvert this investigation, Schultz allows CAI to operate outside the law and impedes the privilege of the public to benefit from the protection it is intended to confer.

Supporting Documents

Exhibit A: CAI Certificate of Formation


Form 202 Secretary of State P.O. Box 13697 Austin, TX 78711-3697 FAX: 512/463-5709 Filing Fee: \$25	 Certificate of Formation Nonprofit Corporation	Filed in the Office of the Secretary of State of Texas Filing #: 803682621 07/14/2020 Document #: 982909090002 Image Generated Electronically for Web Filing
Article 1 - Corporate Name		
The filing entity formed is a nonprofit corporation. The name of the entity is :		
<u>Congregation Ateres Israel</u>		
Article 2 – Registered Agent and Registered Office		
<input type="checkbox"/> A. The initial registered agent is an organization (cannot be corporation named above) by the name of:		
OR		
<input checked="" type="checkbox"/> B. The initial registered agent is an individual resident of the state whose name is set forth below:		
Name:		
Benjamin Epstein		
C. The business address of the registered agent and the registered office address is:		
Street Address:		
6107 Preston Crest Dallas TX 75230		
Consent of Registered Agent		
<input type="checkbox"/> A. A copy of the consent of registered agent is attached.		
OR		
<input checked="" type="checkbox"/> B. The consent of the registered agent is maintained by the entity.		
Article 3 - Management		
<input type="checkbox"/> A. Management of the affairs of the corporation is to be vested solely in the members of the corporation.		
OR		
<input checked="" type="checkbox"/> B. Management of the affairs of the corporation is to be vested in its board of directors. The number of directors, which must be a minimum of three, that constitutes the initial board of directors and the names and addresses of the persons who are to serve as directors until the first annual meeting or until their successors are elected and qualified are set forth below.		
Director 1: Benyomin Epstein	Title: Director	
Address: 6107 Preston Crest Dallas TX, USA 75230		
Director 2: Eli Nissel	Title: Director	
Address: 6107 Preston Crest Dallas TX, USA 75230		
Director 3: Benjamin Epstein	Title: Director	
Address: 6107 Preston Crest Dallas TX, USA 75230		

Exhibit B: General Warranty Deed for 6107 Prestoncrest

GENERAL WARRANTY DEED	
Effective Date:	January 1, 2022
Grantor:	Benjamin Asher Epstein and wife, Baila Batya Epstein
Grantor's Mailing Address:	
	6032 Linden Lane Dallas, Texas 75230
Grantee:	Congregation Ateres Israel
Grantee's Mailing Address:	
	6107 Prestoncrest Lane Dallas, Texas 75230
Consideration:	Ten Dollars (\$10.00) and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, specifically including Grantee's assumption of any existing mortgage lien debt encumbering the Property.
Property (including any improvements):	
	Lot 14, in Block 27749 of PRESTON CREST ADDITION, an Addition to the City of Dallas, Dallas County, Texas, according to the map or plat thereof recorded in Volume 17, Page 59, Map Records, Dallas County, Texas, more commonly known as 6107 Prestoncrest Lane, Dallas, Texas 75230.

Exhibit C: Code Compliance Investigative Findings



Audit History

SR # 22-00146882

Service Request Summary

Service Request Number	22-00146882	Created By	Joseph Shelton
Status	Closed	Created Date	Fri Apr 15 16:53:18 GMT 2022
Service Request Description		Last Modified By	Joseph Shelton
Service Request Comments		Last Modified Date	Fri Jun 10 15:42:03 GMT 2022

Work Order Line Item Summary


Work Order Line Item Number	00000053	Assessment Result	Violation
Subject	Illegal Land Use	SLA Date	Sun May 15 00:00:00 GMT 2022
Internal Comments	Rabbi Epstein is conducting services with large amount of people with no permit for special events or synagogue.		
External Comments			
Corrective Actions	Do not conduct services with large amounts of people with no special events permit or synagogue registration permit.		

Work Order Line Item Summary

Work Order Line Item Number	00000056	Assessment Result	Violation
Subject	No Building Permit (52.301.1.1)	SLA Date	Sun May 15 00:00:00 GMT 2022
Internal Comments	The property has no permit to be running a synagogue.		
External Comments			
Corrective Actions	Obtain a permit to operate the structure as a synagogue.		

File Name	File Description	Uploaded By	Uploaded Date
289F4511-6982-4D31-8599-643FAA2A2799.jpeg	Property ID Photo	Joseph Shelton	4/15/2022 12:00 PM
1DA40050-A017-4AE9-AA59-D115464A9D86.png	Permits Photo	Joseph Shelton	4/15/2022 12:03 PM
725D6AB5-DC3D-44A9-9311-7DB338F4EF8C.jpeg	Church in progress Photo	Joseph Shelton	4/15/2022 12:00 PM
25905250-B18C-415D-A27E-2E6671E7F4CA.jpeg	Cars in front Photo	Joseph Shelton	4/15/2022 12:01 PM

Exhibit D: Notice of Violation



CITY OF DALLAS
DEPARTMENT OF CODE COMPLIANCE
NOTICE OF VIOLATION

Name: EPSTEIN BENJAMIN ASHER & BAILA B **Case #:** 22-00146882

EPSTEIN BENJAMIN ASHER & BAILA B
 6107 PRESTON CREST LN
 Dallas, TX 75230
 USA

Your property located at 6107 PRESTONCREST LN, DALLAS, TX, 75230 is in violation of the Dallas City Code.

Violations of Dallas City Code:

Violation	Comments	Resolve By Date
Illegal Land Use	Do not conduct services with large amounts of people with no special events permit or synagogue registration permit.	April 25, 2022
No Building Permit	Obtain a permit to operate the structure as a synagogue.	April 25, 2022

Violations with an (*) will serve as your Annual Notice
 I will reinspect your property on April 25, 2022 to determine if the above described violation(s) have been corrected. If your property is not brought into compliance within the above calendar days, then the City may correct the violation(s) at your expense. All expenses incurred will be billed to you. Failure to pay these expenses will result in a lien being placed on your property. Additionally, if you fail to comply with this notice, the City may issue you a citation for each day a violation is committed. The maximum fine is \$2,000.00 per citation.

Thank you in advance for your cooperation. If you have questions, please call me at (214) 846-8190.

Inspector: Joseph Shelton **Badge:** C1810

Signature:
 Owner / Occupant / Person in Control of Property

Date: April 15, 2022

Date: April 15, 2022

Exhibit E: City Emails Before and During Investigation (37 Pages)

These emails between April 14-28, 2022 begin with a complaint from a citizen to City Manager T.C. Broadnax, who passed it along to city staff and requested that they investigate. The remainder of the thread is city staff discussing the details of the complaint, confirming the violation, and determining that there were no efforts in progress with the permitting office to resolve the issue. These emails end with Council Liaison Figueroa sending the history to Schultz as an FYI.

<https://drive.google.com/file/d/10B0zd8eZjsgKI7g08wqKAVcVL5453FwE/view?usp=sharing>

Exhibit F: City Emails During and After Investigation (46 Pages)

These emails include some overlap with Exhibit E and span April 29-July 1, 2022. They include the additional context of Epstein's earliest contacts with Ceder as well as his later contacts in July with Schultz on this matter.

https://drive.google.com/file/d/12K4463WA9A2HMSBaOnu1_6441ZIWw78V/view?usp=sharing