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BY U.S. MAIL AND INTERNET EMAIL

29 August 2008

Michael J. Aguirre, City Attorney
CITY OF SAN DIEGO
1200 Third Avenue, Suite 1620
San Diego, CA 92101

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

RE: Amendment of Form 700 Statements of Economic Interests

Dear Mr. Aguirre and Ms. Fulhorst:

As you may be aware, I have provided corporation counsel services to Centre City Development Corporation ("CCDC"). The purpose of this letter is inform your respective offices that I will be filing amendments to my Statements of Economic Interest for calendar years 2005 and 2006, as well as 2007, and to explain the reason for these amendments.

The Form 700 Statement of Economic Interest that I filed earlier this year for calendar year 2007 disclosed Lennar as a source of income to me. One of my partners represents Lennar Homes of California with respect to a single family residential subdivision in Escondido. Accordingly, Lennar has been a source of income to my firm, of which I am a twenty-five percent (25%) owner.

There were CCDC meetings on the San Diego Marriott at Ballpark Village project beginning in July of 2007. At that time, I did not know that Lennar had an interest in that project; thus I did not announce a disqualification and/or leave the room during the meeting. The staff reports did not mention Lennar as an owner of the project. Staff has informed me that neither the Ownership Disclosure Statement provided by JMI or the Centre City Development Permit Application listed Lennar as an owner of the project.

As a result of recent events that involve Nancy Graham and Lennar, I have reviewed both CCDC's and my firm's involvement with Lennar. Because the Ballpark Village Owner Participation Agreement was approved in 2005, I also undertook a review of my Form 700 filings for calendar years 2005 and 2006 and associated accounting information. In view of Lennar's

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ongoing involvement in Ballpark Village, I have determined that there were payments to my firm by Eureka Escondido, LLC, an entity which I have since learned included Lennar as a member, thus a firm representation which should have been disclosed on these Form 700 filings. This entity was formed for the single family residential subdivision in Escondido, and Lennar is the managing member of that entity. Therefore, I am filing amended Form 700s for those years with the Office of the City Clerk. Further, this interest should have been disclosed at hearings held by the Board on the 2005 Owner Participation Agreement, and I did not do so. I am filing an amendment to the 2007 Form 700 to include a reference to the Eureka Escondido, LLC in addition to Lennar.

I should note that I have performed work on Public Records Act requests involving the Ballpark Village project, providing documents requested by members of the public and coordinating with staff with respect to review and production of the same.

Our firm has evaluated the issue, and has since undertaken measures to ensure that issues such as these will not recur. However, because the work my partner is performing for Lennar continues, as the Ballpark Village project is ongoing, and in light of the controversy surrounding recent events involving Nancy Graham and Lennar, I believe it is in the best interest of CCDC that I step down from my role as corporation counsel and will concurrently present the Board with my resignation.

While I regret the need to file the amended Form 700s, I do appreciate the fact that by reason of recent events I was made aware of the need to review the filings so that I could take the appropriate action to supplement the same. In the event either of your respective offices have any further questions, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Helen Holmes Peak". The signature is written in a cursive, flowing style.

HELEN HOLMES PEAK

cc: Chair and Members of the Centre City Development Corporation Board