Human Relations Commission Agenda

The Human Relations Commission (HRC) is a citizen commission appointed by the Fremont City Council. Human Relations Commission business is conducted in a public forum and operates within the provisions of the Brown Act. Information on the Brown Act may be obtained from the City Clerk’s office at 3300 Capitol Avenue (phone 284-4060).

Pursuant to State of California Executive Order N-29-20 dated March 17, 2020, regarding the COVID-19 pandemic, the Human Resources Conference Room will not be open for the January 25, 2021 meeting of the Human Relations Commission. The meeting will be conducted remotely via Zoom.

The Public may watch and/or participate in the public meeting by joining the meeting through the Zoom Videoconference link provided below. The public may also join the meeting by calling the below listed teleconference phone number. Further instructions on how to make public comments throughout the videoconference or teleconference will be provided at the meeting.

If you are an individual with a disability and need a reasonable modification or accommodation pursuant to the Americans with Disabilities Act (ADA), please contact the Recording Secretary at sjeyakumar@fremont.gov or 510-574-2061 at least 24 hours prior to this meeting for assistance.

HOW TO JOIN OR MAKE A PUBLIC COMMENT ONLINE OR BY PHONE: The meeting will begin at 7:00pm PST. Whether you participate online or by phone, you may wish to "arrive" early so that you can address any technology questions prior to the start of the meeting.

ONLINE:  https://zoom.us/j/93168422397?pwd=UDlCWi8vZWZUjVmbytvZjZjMmVMQT09
Password: 326858

When prompted, download and run the Zoom software on your computer. If you have not used Zoom on your computer before you may want to join the call 15 minutes early to test your configuration. Someone will be in the conference at that time to help you.

BY PHONE: US: +1 669 900 9128   Webinar ID: 931 6842 2397
Password: 326858
International numbers available: https://zoom.us/u/ap6AtFwni
General Order of Business

1. Secretary Check for Quorum 6. Written Communications 11. Commission Referrals
2. Call to order – 7:00 p.m. 7. Announcements 12. Committee Reports

Order of Discussion

Generally, the order of discussion after introduction of an item by the Chair will include comments and information by staff followed by Human Relations Commissions questions, inquiries or discussion. The applicant, authorized representative, or interested citizens may then speak on the item. At the close of public discussion, the item will be considered by the Commission and action taken.

Oral Communications

Any person desiring to speak on a matter which is not scheduled on this agenda may do so under Oral Communications. The Human Relations Commission will take no action on an item which does not appear on the agenda. The item may be agendized for the next regular meeting or at a special meeting called in accordance with the terms of the Brown Act. The Human Relations Commission may establish time limits of presentations.

Information about the City or items scheduled on the Agenda may be referred to:

Suzanne Shenfil, Director  
Human Services Department  
3300 Capitol Ave  
Fremont, CA 94538  
(510) 574-2051

Arquimides Caldera, Deputy Director  
Human Services Department  
3300 Capitol Ave.  
Fremont, CA 94538  
(510) 574-2056

Your interest in the conduct of your City’s business is appreciated.
Mission Statement

The City of Fremont’s Human Relations Commission (HRC) strives to prevent discrimination and ensure that the rights of all individuals and groups in Fremont are protected under the law. The HRC promotes, supports, and helps create a compassionate community environment where diversity is honored and respected, neighbors reach out and support each other, and the most vulnerable receive services; to allow all a high quality of life in a community where we live, learn, work, and play in peace and harmony.
AGENDA
HUMAN RELATIONS COMMISSION
REGULAR MEETING
MONDAY, JANUARY 25, 2021
7:00 P.M.

1. SECRETARY CALL FOR QUORUM

2. CALL TO ORDER

3. ROLL CALL

Welcome to Commissioner Martin H. Kludjian.

4. APPROVAL OF MINUTES

4.1 Approve November 16, 2020 Regular Meeting Minutes (Enclosure 4.1)
4.2 Approve December 7, 2020 Special Meeting Minutes (Enclosure 4.2)

5. ORAL COMMUNICATIONS

6. WRITTEN COMMUNICATIONS

Enc. 6.1 – CAHRO Convening
Enc. 6.2 - World Interfaith Harmony Day Thank You

7. ANNOUNCEMENTS

8. CONSENT ITEMS

8.1 Attendance Summary (Enclosure 8.1.1)
8.2 Calendar of HRC regular/special meetings and events. (Enclosure 8.2.1)

9. OLD BUSINESS

9.1 Nomination and Election of HRC Chair and Vice Chair

BACKGROUND: On December 7, 2020, staff clarified Article II of the
HRC’s rules and regulations, as it applies to the current commissioners and
their eligibility for nomination and election to each of the HRC’s two 2021
officer positions.

The first sentence of Article II states that “No Chairperson shall be eligible for
election as such for more than two consecutive full terms.” Based on the
following clarifications, the following Commissioners are eligible for each
officer position.
Eligible Candidates for 2021 HRC Chairperson
Chairperson Moore is completing her second consecutive term in her current position. According to Article II, Chairperson Moore is ineligible to serve as Chairperson in 2021. Therefore, all current commissioners, with the exception of Chairperson Moore, are eligible to be nominated and elected the HRC’s 2021 Chairperson.

Eligible Candidates for 2021 Vice Chairperson
Vice Chairperson Dewan is completing a term in his current position as Vice Chairperson. Vice Chairperson Dewan previously served as Vice Chairperson in 2015 and 2016.

The first sentence of Article II references solely to the office of Chairperson. Also, no other section of the HRC’s Rules and Regulations contain any language limiting the number of terms, consecutive or otherwise, that a Commissioner may serve as Vice Chairperson. Therefore, all current commissioners are eligible to be nominated and elected the HRC’s 2021 Vice Chairperson.

Nominations
On December 7, 2020, the Commission also appointed a Nominating Committee of Chairperson Moore, and Commissioners Tiernan, and Ramamurthi. The Nominating Committee has nominated Dharminder Dewan for Chairperson and Patricia Montejano for Vice-Chairperson. Both Commissioners accepted their nominations. Article II also states that “persons other than those recommended by the Nominating Committee may be nominated from the floor.”

Enclosures: 9.1.1 - HRC Rules adopted 3-22-06

RECOMMENDATIONS: Receive Nominating Committee recommendations for Chair and Vice Chair. Open the floor for any additional nominations. Vote for Chair and Vice Chair positions.

9.2 Police Chief Updates Regarding Hates Crimes and Recent Conversations with FUSD on the School Resource Officer Program

BACKGROUND: At its October 19, 2020 meeting, commissioners requested staff provide an update on hate crime data for the City of Fremont.

Staff provided hate crime data tracked by the Fremont Police Department and available to the public on its transparency portal: https://www.fremontpolice.gov/about-us/transparency-portal/hate-crime.
According to the site, Fremont Police documented four (4) hate crime reports in 2019. In 2020, the Fremont Police Department has investigated one (1) incident on June 26, 2020, involving graffiti depicting racist symbols at a construction site in Centerville.

At its November 16, 2020 meeting, commissioners requested data for additional years, including the number of complaints received and number of hate crimes reported. Commissioners also suggested inviting a representative from Police Department to attend an HRC meeting to explain the process and answer any questions.

The Commission has also expressed concern regarding three highly publicized incidents, including:

- A Fremont woman caught on camera yelling at the Asian woman and her daughter,
- An incident at Niles Discovery Church, and
- The defacing of a Black Lives Matter support poster on the Unitarian Church property

Police Chief Kim Petersen and Detective Michael Gebhardt will present data on City of Fremont hate incidents and hate crimes and will also be available to answer questions about the process used to determine which incidents are investigated and/or prosecuted as hate crimes.

Chief Petersen will also provide an update on recent discussions with FUSD regarding the School Resource Officer Program.

Enclosure: None

RECOMMENDATION: Receive report and provide direction to staff.

9.3 FY 2020-21 Social Services Grant Mid-Year Evaluation Process

BACKGROUND: The City of Fremont funds an array of local non-profit agencies through Social Service grants funded by the general fund, Community Development Block Grant (CDBG) fund and Paratransit (Measure B) fund. Funding is provided on a three-year cycle. FY 2020-2021 is the second fiscal year of this cycle. The fiscal year ends on June 30, 2021.

One of the functions of the Human Relations Commission (HRC) is to review and recommend grant funding of human services proposals to the City Council. Based on the recommendation made by the HRC, in May 2019 the City awarded $682,781 in funding to fifteen Human Services programs that provide services to low and moderate-income residents.
**Mid-Year Evaluation:** Another function of the HRC is to review agencies on a year to year basis through participation in the mid-year evaluation process. Commissioners generally attend at least one mid-year site visit as a way to become more familiar with individual agencies.

Due to the COVID-19 pandemic, at its November 16, 2020 meeting, the HRC agreed to participate in a modified “virtual” evaluation process, that will include grantees completing an online mid-year questionnaire and commissioners visiting grantees via Zoom or other video conferencing service. Enclosed is an updated timeline for review.

**Enclosures:** 9.3.1 - FY 20-21 Social Service Grant Evaluation Process

**RECOMMENDATIONS:** Receive staff update on evaluation process.

10. **NEW BUSINESS** (Items on which the Commission has not yet had an agendized discussion or taken action)

10.1 **Review of HRC Election Rules**

**BACKGROUND:** On December 7, 2020, the HRC directed staff to agendize an item to review and update election rules in the Commission’s rules and regulations.

Staff recommends the Commission appoint an adhoc committee to provide an initial review of existing language and recommend alternative language for the entire HRC to review and vote on.

**Enclosure:** None

**RECOMMENDATION:** Appoint an adhoc committee and take any other action as appropriate.

11. **COMMISSION REFERRALS** (Referrals from the City Council to the Commission)

12. **COMMITTEE REPORTS**

12.1 **Financial Resources Committee to fund HRC sponsored events**

**COMMITTEE BACKGROUND:** Chair Moore, Vice-Chair Dewan, and Commissioner Ramamurthi work to create and implement a sustainable fundraising strategy for HRC sponsored events.

**RECOMMENDATION:** Receive update and take action as needed.
12.2 LGBTQ Committee

COMMITTEE BACKGROUND: Commissioners Kwan, Montejano, and Dhani sit on the LGBTQ Committee.

RECOMMENDATION: Receive updates from Committee and take action as needed.

12.3 Ad Hoc Committee Reports

12.4 Liaison Reports

12.4.1 Union City HRC: Commissioner Tiernan is the HRC’s liaison for the Union City HRC.

RECOMMENDATION: Receive update

12.4.2 FRC CAEB: Vice-Chair Dewan is the HRC’s liaison for the FRC CAEB.

RECOMMENDATION: Receive update

12.4.3 FUSD: Commissioner Khan is the HRC’s liaison for FUSD.

RECOMMENDATION: Receive update

13 STAFF REPORTS

13.1 Venmo Complaint Update

Background At the October 19, 2020 HRC meeting, in response to complaint submitted by Ms. Moina Shaiq, the Commission voted to send a letter to Venmo, asking them clarify its Office of Foreign Assets Control (OFAC) compliance policies, including algorithms currently in place to flag individual payments, like the one described by Ms. Shaiq, and urge Venmo to return Ms. Shaiq’s $100.

Enclosed is a letter from PayPal’s (which operates Venmo) legal counsel, to the City and Ms. Shaiq, responding to the request.

Ms. Shaiq $100 have been returned to her Venmo Account.

Enclosure: 13.1.1 – M. Shaiq Venmo Complaint

13.2 Homeless Services Update
Staff will provide updates on ongoing City homeless services and initiatives.

14. **REFERRALS TO STAFF** (a request to have items placed on a future Commission agenda as an item of new business. A vote against means it will be dropped without consideration).

15. **ADJOURNMENT**
1. **SECRETARY CALL FOR QUORUM**

2. **CALL TO ORDER**

3. **ROLL CALL**

   **Present:** Chairperson Moore, Vice Chairperson Dewan, Commissioners Dhami, Khan, Kwan, and Montejano

   **Absent:** Commissioners Ramamurthi and Tiernan

   **Staff Present:** Director Shenfil, Deputy Director Caldera, Management Analyst II, Leticia Leyva, Sr. Accounting Specialist Jeyakumar

4. **APPROVAL OF MINUTES**

   A motion was made by Commissioner Kwan, and seconded by Commissioner Montejano, to approve the October 19, 2020 minutes. The motion passed as follows:

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5. **ORAL COMMUNICATIONS**

   None

6. **WRITTEN COMMUNICATIONS**

   None
7. **ANNOUNCEMENTS**

Deputy Director Caldera reported that the following two proclamations were presented at the November 10, 2020 City Council Meeting:

- United Against Hate Week – November 30 through December 6.
- Transgender Day of Remembrance – November 20, 2020

8. **CONSENT ITEMS**

8.1 Attendance Summary

8.2 Calendar of HRC regular/special meetings and events

8.3 Cancellation of Regular December 2020 HRC Meeting

_A motion was made by Commissioner Kwan, and seconded by Commissioner Dhami, to pass consent on items 8.1, 8.2, and 8.3. The motion passed as follows:_

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9. **OLD BUSINESS**

9.1 Addressing Hate Speech

Deputy Director Caldera updated Commissioners on the transparency portal maintained by Fremont Police Department (PD) which tracks hate crime data. Commissioner Dewan requested staff to obtain information from PD on the process used to evaluate complaints and document hate crimes.

Staff to request data from PD over the past 5 years on number of complaints received and number of hate crimes reported. Commissioners also suggested inviting a representative from Police Department to attend a HRC meeting to explain the process and answer any questions.

10 **NEW BUSINESS** (Items on which the Commission has not yet had an agendized discussion or taken action)

10.1 FY 2020-21 Social Services Grant Mid-Year Evaluation Process
Leticia Leyva reviewed the complete mid-year evaluation process for FY 2020-2021 Social Service Grant. Commissioners suggested asking agencies and clients the following questions, in view of the disparate circumstances this year.

**Questions to Agencies:**
1. Please provide us a comparative report on the service levels attained in previous years, compared to FY 2019-2020.
2. Have you attained the goals set forth in the beginning of the year? If not, what is the percentage reached?

**Questions to Clients, via Survey Monkey:**
1. How have you been impacted by COVID and how has the agency continued to provide these particular services to you?
2. Do you feel safe receiving services in the current COVID situation?

Ms. Leyva informed the Commissioners that certain questions related to COVID had been included in the year-end questionnaires which were sent out to the agencies after the shelter-in-place order was issued. Ms. Leyva will compile responses from the agencies and provide them to Commissioners. These responses will help the Commissioners when they perform the evaluations.

*A motion was made by Commissioner Dewan, and seconded by Commissioner Dhami, to include the above additional questions presented by Commissioners, in the mid-year evaluation questionnaire to agencies and clients; and to approve the mid-year questionnaire, manager evaluation and the mid-year evaluation process/timeline. The motion passed as follows:*

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### 10.2 Appointment of Nominating Committee for 2021 HRC Chairperson and Vice-Chair

Commissioner Khan raised a question regarding Article II of the HRC’s rules and regulations, which states that no Chairperson shall be eligible for election as such for more than two consecutive full terms. Commissioner Khan’s question was: If a Commissioner holds the Chairperson post for 2 consecutive years, then steps down for one year, would they be eligible to be nominated the following year?
Staff will check with Attorney on this query and provide a response.

*A motion was made by Commissioner Moore, and seconded by Commissioner Montejano, to schedule a special meeting in the first or second Monday of December, to appoint three members to the Nominating Committee to nominate 2021 officers. The motion passed as follows:*

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Commissioner Kwan recused himself from the nomination process, due to his recent election to the Ohlone College Board of Trustees.

11. **COMMISSION REFERRALS** (Referrals from the City Council to the Commission)

12. **COMMITTEE REPORTS**

12.1 **Financial Resources Committee to fund HRC sponsored events**
No updates.

12.2 **LGBTQ Committee**
Commissioner Kwan noted that a representative for this Committee will need to be confirmed at the January 2021 meeting.

12.3 **Ad Hoc Committee Reports**

12.4 **Liaison Reports**

12.4.1 **Union City Human Relations Commission**
Commissioner Kwan reported that the Chair of Union City HRC would be stepping down, as they have been elected to a public office.

12.4.2 **FRC Community Advisory and Engagement Board (CAEB)**
Vice Chairperson Dewan reported that Alameda County Small Business gave a presentation at the October 20th CAEB meeting. Vice Chair Dewan informed the CAEB that the City’s Sustainability Team wanted to provide a presentation on the Climate Action Plan.

Ms. Shenfil said that FRC has launched the Rental Assistance Program on behalf of City of Newark. Commissioner Montejano will provide information to Newark residents of this program. Funds need to be spent by December 31, 2020.
12.4.3 Fremont Unified School District (FUSD)
Commissioner Khan reported that the School Resource Officer program was dissolved at the FUSD meeting on Thursday, October 29, 2020. Over 300 people attended the meeting virtually; the meeting ended at 1:30 a.m.

13 STAFF REPORTS

13.1.1 Giving HOPE 2020 Holiday Appeal
Ms. Shenfil reported that the need is much greater this year and the focus is on identifying families and seniors who are isolated. Niles St. Nick is planning a virtual concert as a fund-raiser.

13.1.2 Housing Navigation Center (HNC) Update
The HNC has 25 participants, per Harjeet Reehal, Coordinator of the HNC. Three participants have gained employment. 64% are currently working; 60% are on SSI/disability; 60% on general assistance. 5-8 participants are housing ready and applications have been submitted. The participants are provided workshops to equip them to re-enter the workforce. Daily Bowl and Community Seva provide food to the Center’s participants.

The Dominican Sisters of Mission San Jose donated $10,000 to the HNC. American Association of University Women (AAUW) Fremont Branch is launching a Holiday Shoe Drive benefitting the homeless - *A Step in the Right Direction*. Tri-City Voice published information on the shoe drive.

13.1.3 Commission Vacancy(ies)
The HRC has two vacancies, as Commissioner Almaliti tragically passed away and Commissioner Kwan was elected to local public office.

Commissioners noted that it would be of value to meet the applicants, provide them information on what is expected of them, and assess the strengths and interests the applicants would offer. A summary of the candidates’ information could be compiled and provided to the Mayor.

*A motion was made by Commissioner Kwan, and seconded by Commissioner Dewan, to provide Mayor Mei with input on what the Commissioners expect from the applicants. The motion passed as follows:*

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Minutes • Human Relations Commission Regular Meeting
November 16, 2020
Mr. Caldera and Chairperson Moore thanked Commissioner Kwan for all that he had contributed to the Commission during his tenure and congratulated him on his new elected position.

14. **REFERRALS TO STAFF** (a request to have items placed on a future Commission agenda as an item of new business. A vote against means it will be dropped without consideration).
None

15. **ADJOURNMENT**

_A motion was made by Commissioner Kwan, and seconded by Commissioner Montejano, to adjourn the meeting at 9:05 p.m. The motion passed as follows:_

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1. SECRETARY CALL FOR QUORUM

2. CALL TO ORDER

3. ROLL CALL

   **Present:** Chairperson Moore, Vice Chairperson Dewan, Commissioners Dhami, Khan, Montejano, Ramamurthi, and Tiernan

   **Staff Present:** Director Shenfil, Deputy Director Caldera, Sr. Office Specialist Tolentino, Sr. Accounting Specialist Jeyakumar

4. APPROVAL OF MINUTES

   This item was tabled to the regular meeting in January 2021

5. ORAL COMMUNICATIONS

   Fremont resident, Kelly directed attention to the KQED Arts series on Amit Patel, Choreographer, who is reinventing Bollywood Dance His Way. He noticed that the backgrounds in the video featured Coyote Hills, Niles Canyon, the Secret Sidewalk in Niles, and the Railroad tracks. He expressed his view that nature is the best stage for cultural expression and people have a need to connect with nature. Kelly was concerned for Amit’s safety as he was dancing on an active railroad track.

   Lance Kwan, former Human Relations Commissioner, thanked the Commission for the time he was provided to serve. He was pleased that the process of nomination and election of the Chair and Vice Chair was clear and there was no anticipated conflict.

6. WRITTEN COMMUNICATIONS

   None

7. ANNOUNCEMENTS

   None

8. CONSENT ITEMS

   None

9. OLD BUSINESS

   9.1 Appointment of Nominating Committee for 2021 HRC Chairperson and Vice-Chair
Mr. Caldera presented the City’s legal clarification of the first sentence of Article II of the HRC’s rules and regulations.

Staff and Commissioners discussed the nomination process. Commissioner Ramamurthi, Commissioner Tiernan and Chairperson Moore volunteered for the Nominating Committee.

*A motion was made by Chairperson Moore, and seconded by Commissioner Montejano, to appoint Commissioners Ramamurthi, Tiernan and herself as the Nominating Committee. The motion passed as follows:*

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<tr>
<td>Tiernan</td>
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Commissioner Tiernan was appointed Chair of the Nominating Committee.

Ms. Shenfil reminded Commissioners that being in the Nominating Committee does not preclude them from being nominated for office.

10. **REFERRALS TO STAFF** (a request to have items placed on a future Commission agenda as an item of new business. A vote against means it will be dropped without consideration).

*A motion was made by Commissioner Khan, and seconded by Commissioner Montejano, to review and update the election rules. The motion passed as follows:*

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Abstain</th>
<th>Absent</th>
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<tbody>
<tr>
<td>Dewan</td>
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<td>Dhami</td>
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<td>Khan</td>
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11. **ADJOURNMENT**

The meeting was adjourned at 7:32 p.m.
VIRTUAL CONVENING: REFLECT ON 2020, PLAN FOR 2021

The California Association of Human Relations Organizations (CAHRO) board invites you to join us in a discussion about how to gain a broader understanding of the national trends of extremism and its impact in our most vulnerable communities & discuss the after-effects of the 2020 Election. This is also a chance for personal reflections about 2020 in small groups so we can be better equipped for 2021.

TUESDAY, JANUARY 26, 2021
1 PM - 2:30 PM
FREE EVENT VIA ZOOM

Register at: http://tiny.cc/reflectplancahro
For more info on CAHRO, see www.cahro.org
Dear Suzanne,

Please share this email with the Chair and HRC Commissioners.
Thanks

Dear Chair Moore,

On behalf of the World Interfaith Harmony Day committee of Tri City Interfaith Council, I would like to thank the Fremont Human Relations Commission for their support of our efforts by not only co-sponsoring the event but also making a financial contribution. We appreciate it.
In this time when so much is going on in the world, it is very important to celebrate our diversity by bringing people together at this Harmony Day event.

Sincerely,

LOVE>hate
Moina Shaiq
## CITY OF FREMONT
Boards, Commissions, and Committees Attendance Record

### HUMAN RELATIONS COMMISSION

<table>
<thead>
<tr>
<th>Member</th>
<th>Meeting Dates</th>
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<tbody>
<tr>
<td>MEETING TYPE</td>
<td>R R R R R R</td>
</tr>
<tr>
<td>Dharminder Dewan</td>
<td></td>
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<tr>
<td>Tejinder &quot;TJ&quot; Dhami</td>
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<tr>
<td>Dr. Sonia Khan</td>
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<tr>
<td>Martin H. Kludjian</td>
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<tr>
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<td>Shobana Ramamurthi</td>
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<tr>
<td>Cullen Tiernan</td>
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</tbody>
</table>

**Attendance Codes**

- P - Present
- A - Absent
- E - Excused Absence

**Meeting Codes**

- R - Regular Meeting
- S - Special Meeting
- L - Lack of Quorum
- C - Cancelled Meeting for lack of business

* Due to lack of Quorum, absence does not affect eligibility.

Commissioners can not have two unexcused meetings in a row in a one year time frame AND Commissioners can not have three unexcused meetings in a 6 month time period. Jan - June and July - December
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Boards, Commissions, and Committees Attendance Record

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<tr>
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<tbody>
<tr>
<td></td>
<td>7/19/21</td>
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<tr>
<td>Dharminder Dewan</td>
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<tr>
<th>Date</th>
<th>Meeting Type</th>
<th>Time &amp; Location</th>
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</thead>
<tbody>
<tr>
<td>Monday, January 25, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, February 22, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
</tr>
<tr>
<td>Monday, March 15, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, April 19, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, May 17, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, June 21, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, July 19, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, August 16, 2021</td>
<td>Regular Meeting</td>
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<tr>
<td>Monday, September 20, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, October 18, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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<tr>
<td>Monday, November 15, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
</tr>
<tr>
<td>Monday, December 27, 2021</td>
<td>Regular Meeting</td>
<td>7:00pm on Zoom</td>
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</table>

* This calendar may be adjusted throughout the year as needed to include trainings, special meetings, etc.
RULES AND REGULATIONS
OF THE HUMAN RELATIONS COMMISSION
OF THE CITY OF FREMONT

ARTICLE I - GENERAL

The Commission is established pursuant to Article 1 (Sections 2—3100 - 2-3104) and Article 5 (Sections 2-3500 et seq.), Chapter 3, Title II of the Fremont Municipal Code, and reference is made thereto for statements of policies and purposes of the Commission, and for provisions relating to Functions and Powers of the Commission, appointments, qualifications and terms of office of Commissioners, removal and termination of membership of Commissioners, and terms of office and times of election of the Chairperson and Vice Chairperson of the Commission.

ARTICLE II - ELECTION OF OFFICERS

No Chairperson shall be eligible for election as such for more than two consecutive full terms. At the last regular meeting of each calendar year, the Commission shall appoint three (3) of its members as a Nominating Committee. The incumbent Chair and Vice-Chair may be members of the Nominating Committee. The Nominating Committee shall recommend to the Commission persons to fill the offices of the Commission. The Nominating Committee shall obtain consent of nominees, and shall then notify staff of its recommendations. Staff will then include the recommendations on the agenda of the first regular meeting of the calendar year. Persons other than those recommended by the Nominating Committee may be nominated from the floor.

ARTICLE III - DUTIES OF OFFICERS

A. CHAIRPERSON

1. It shall be the duty of the Chairperson to preside at all meetings of the Commission.
2. The Chairperson shall decide all points of order and, unless a majority of votes dissent therefrom, that decision shall stand.
3. The Chairperson shall appoint the Chairperson of all committees, except the Chairperson of the Nominating Committee. Appointments to every committee shall be ratified by the Commission. The Chairperson shall be an ex-officio member of all committees, except the Nominating Committee.
4. The Chairperson, or that person's designated appointee, shall represent the Commission at appropriate public functions.

B. VICE CHAIRPERSON

The Vice Chairperson shall perform all duties that may be assigned to that office. The Vice Chairperson shall perform the duties of the Chairperson in the absence of that officer.

ARTICLE IV

INDIVIDUAL AUTHORITY AND ATTENDANCE OBLIGATIONS OF COMMISSIONERS

A. No action shall be taken by any Commission member on behalf of or in the name of the Commission unless that member is specifically authorized by the Commission so to do.

B. Attendance rules are found in the Fremont Municipal Code Section 2-3102.
ARTICLE V - COMMITTEES

The Commission may, at its discretion, establish standing and ad hoc committees composed of less than a majority of the members of the Commission. The purpose of said committees may be to investigate, study, consider, and report back to the Commission at a regular or special meeting with respect to a particular matter of concern. The reports and recommendations of a committee shall be made publicly to the Commission at a regular or special meeting and discussion and deliberation with respect thereto shall be held publicly by the Commission before final action thereon is taken.

ARTICLE VI - MEETINGS

Meetings of the Commission are governed by the Brown Act (Govt. §§ 54950 et seq). To the extent that these rules are inconsistent with the Brown Act, the latter shall govern.

A. REGULAR MEETINGS

Regular meetings of the Commission shall be held monthly on the third Monday of each month at 7:15 P.M. If a regular meeting falls on a holiday, it shall be deemed canceled unless the Commission has, at a prior meeting rescheduled it to a date which is not a holiday.

Agendas of all Commission regular meetings shall be published a minimum of 72 hours in advance of the meeting and posted for public viewing.

B. SPECIAL MEETINGS

1. Special meetings of the Commission may be held on call of the Chairperson, or by a quorum of the members of the Commission. The call shall be by written notice delivered to each Commission member and to each local newspaper of general circulation, radio or television station which has in writing requested notice of such meetings. Any such call and notice must be delivered personally or by mail at least twenty-four (24) hours prior to the time set for such meeting.

2. The call for a special meeting shall specify the time, date and place of such meeting and the business to be transacted at such meeting. The notice provided for herein may be dispensed with as to any member who is actually present at the meeting at the time it convenes or who, at or prior to the time the meeting convenes files with the Secretary a written waiver of notice.

C. ADJOURNED MEETINGS

The Commission may adjourn any regular, adjourned regular, special or adjourned special meeting to a time and place specified in the order of adjournment. Less than a quorum may so adjourn from time to time. If all members are absent from any regular or adjourned regular meeting, the Secretary may declare the meeting adjourned to a stated time and place and shall cause a written notice of the adjournment to be given in the same manner as provided in B above for special meetings, unless such notice is waived as provided for special meetings. A copy of the order or notice of adjournment shall be conspicuously posted on or near the door of the place where the regular, adjourned regular, special or adjourned special meeting was held within 24 hours after the time of the adjournment. When a regular or adjourned regular meeting is adjourned as provided in this section, the resulting adjourned regular meeting is a regular meeting for all purposes. When an order of adjournment of any meeting fails to state the hour at which the adjourned meeting is to be held, it shall be held at the hour specified for regular meetings herein.
D. QUORUM

A quorum of the Commission at any given time shall be deemed to be a majority of the number of members at that time duly and currently holding active appointment to and membership on the Commission.

E. OPEN MEETINGS

All meetings of the Commission shall be open to the public.

ARTICLE VII — CONDUCT OF BUSINESS

A. ORDER OF BUSINESS

The business of each meeting of the Commission shall be transacted as far as possible in the following order:

1. Check for quorum by Secretary
2. Call to Order
3. Roll Call
4. Approval or correction of minutes
5. Oral Communications
6. Written Communications
7. Old business.
8. New business
9. Reports of Commission members
10. Committee reports
11. Reports from Staff
12. Commission Referrals
13. Adjournment

B. ROLL CALL NOT REQUIRED

The roll call need not be called in voting upon a motion except when requested by a member. If the roll is not called, in the absence of objection, the Chairperson may declare the motion unanimously approved.

C. AGENDA PROCESS

Items may be placed on the Commission agenda in the following manner:

1) Referrals to the Commission from the City Council
2) Requests from individual Commissioners (these items will be handled as Commission referrals, so the entire Commission can determine whether the item should be an action item at a subsequent meeting)
3) Annual items requiring Commission action/input, for example social service grants
4) Items that in staff’s and Chair’s judgment require timely consideration by the Commission (e.g. complaints of discriminatory actions)
5) Staff will consult with the Chair prior to finalizing the agenda regarding the inclusion of other items that in their judgment are consistent with the Commission’s mission and/or provide important information that assists the Commission in fulfilling its role.
REQUEST TO BE HEARD

Requirements for persons wishing to appear and be heard at regular meetings on matters germane to the jurisdiction of the Commission, and at special meetings on matters germane to the special business to be transacted at such meetings are as follows:

1. **Regular Meetings.** Interested parties may approach the Chair or staff at least ten (10) days before a scheduled meeting requesting that an item be placed on the agenda. Requests will be evaluated in accordance with the “Agenda Process” described above. Persons wishing to speak on any topic not scheduled on the Agenda may do so during oral Communications.

2. **Special Meetings.** At special meetings, no communications shall be received except as the same are germane to items specified in the call for the special meeting. As to such items, the Chairperson may allow communications from parties having made formal request to be heard, prior to the time the meeting convened.

**Other Ground Rules.** At all times, the Chairperson shall decide the order of appearance, time limits, and other ground rules for hearing persons wishing to be heard, subject to action by a majority of the Commission. In making such decisions, the Chair shall take into consideration the number of speakers and the number of other items on the agenda.

E. **RULES OF DEBATE**

The following shall be used by the Chairperson and members of the Commission as the general rules of debate. However, the Chairperson may at any time declare that the said rules are suspended, until such time as the Chairperson declares them in effect once again. Such declaration may be made upon the Chairperson’s own volition, or at the suggestion of any member of the Commission. Such declaration, however, is subject to action by a majority of the Commission.

1. **Chairperson May Debate and Vote, etc.** The Chairperson may move, second and debate from the chair, subject only to such limitations of debate as are by these rules imposed on all members and shall not be deprived of any of the rights and privileges of a Commissioner by reason of that member’s acting as the Chairperson.

2. **Getting the Floor - Decorum.** Every member desiring to speak shall address the chair, and, upon recognition by the Chairperson, shall confine remarks to the question under debate. Commissioners shall accord the utmost courtesy to each other, City employees and the public appearing before the Human Relations Commission, and shall refrain at all times from rude and derogatory remarks, public criticism of staff, remarks as to integrity, abusive comments and statements as to motives and personalities.

3. **Interruptions.** A member, once recognized, shall not be interrupted when speaking unless it be to call him to order, or as herein otherwise provided. If a member, while speaking, be called to order, that member shall cease speaking until the question of order be determined, and, if in order, that member shall be permitted to proceed.

4. **Privilege of Closing Debate.** The Commissioner moving the adoption of any motion shall have the privilege of closing the debate.

5. **Motion to Reconsider.** A motion to reconsider any action taken by the Commission may be made only on the day such actions was taken. It may be made either immediately during the same session, or at a recessed or adjourned session thereof. Such motion must be made by one of the prevailing side, but may be seconded by any member, and may be made at any time and have precedence over all other motions or while a member has the floor; it shall be debatable. Nothing herein shall be construed to prevent any member of
the Commission from making or remaking the same or any other motion at a subsequent meeting of the Commission.

6. **Remarks of Commissioner When Entered in Minutes.** A Commissioner may request, through the Presiding Officer, the privilege of having an abstract of that Commissioner's statement on any subject under consideration by the Commission entered in the minutes. If the Commission consents thereto, such statement shall be entered in the minutes.

7. **Summary Minutes.** The Secretary will prepare summary minutes, which represent the Secretary's best effort to give a brief summary of the discussion on each agenda item, and which also record all motions and votes. Commissioners will generally defer to staff's discretion regarding the summary, unless the summary contains incorrect information.

8. **Rules of Order.** Except as otherwise provided in these rules, the most current edition of "Robert's Rules of Order, shall be used as a guide to the conduct of the meetings of the Commission, provided, however, that the failure of the Commission to conform to any rule of order shall not, in any instance, be deemed to invalidate the action taken.

**ARTICLE VIII - COMPLAINTS**

**A. COMPLAINTS, DEFINITION OF**

The word complaint, as used in these rules and regulations, means any letter, petition, referral, or other communication regardless of form, concerning any alleged or reported situation involving racial, religious or nationality group tensions, prejudice or disorder occasioned thereby in the City of Fremont, and any problem in inter-personal relations or situation involving racial, religious sex, age, disability, sexual preference, or nationality discrimination against any person, group of persons, organization or business entity in the City of Fremont.

**B. COMPLAINTS, AGENDIZING**

Upon receipt of a complaint (as defined above), the Secretary shall include the complaint as an agenda item at the next regular Commission meeting, in accordance with the “Agenda Process” described above.

**C. COMPLAINTS, ACTION BY COMMISSION**

Upon receipt of a complaint, the Commission may take such action as necessary to fulfill its human relations role as defined in the Fremont Municipal Code. Such actions might include consultation with groups and individuals, using persuasion and conference to arrive at voluntary solutions, and providing advice and recommendations to the City Council.

**ARTICLE IX - AMENDMENTS**

Subject to Section 2-3102 of the Fremont Municipal Code concerning City Council approval, these Rules and Regulations may be amended by a majority vote of the total membership of the Commission at any regular meeting of the Commission, provided, however, that no amendment shall be adopted by the Commission unless a notice of intention to consider the particular amendment, with a copy of the proposed amendment or a reasonably accurate summary thereof, has been sent to all members of the Commission not less than five (5) days prior to the meeting at which any such amendment is considered.
Social Service Grant

Mid-Year Evaluation 2020/21
Evaluation Timeline

- Jan 29th - Mid-Year Questionnaires Due from Agencies via ZoomGrants
- Feb 5th - Grant Reviewers Receive Copy of Agency Questionnaire
  - Pass on to the commissioner(s) accompanying you on the virtual visit
- Feb 8th-April 12th - Mid-Year Agency Evaluation Site Visits
- April 13th - Grant Reviewer Staff Meeting
  - Discuss site visits and preliminary evaluation results
  - Draft evaluation report due from grant reviewers
- April 23rd - Grant Reviewers Submit Draft Evaluation Report to Letty
- April 30th - Draft Mid-Year Evaluations sent to HRC and SCC for Review and Comments
- May 14th - Last Day for HRC and SCC to Respond
- May 28th - Final Mid-Year Evaluations are sent to Agencies
Virtual Site Visits

- Agency will complete the Mid-Year Questionnaire via ZoomGrants
- Reviewer will be informed of which commissioner(s) will be joining in on the virtual site visit
- Reviewer will receive a PDF of the Questionnaire to review and to send to commissioner(s)
- Reviewer will set up the virtual site visit using Zoom, TEAMS, etc. at a time that works for the agency, commissioner and your own schedule
- Discuss with the agency how they would like to proceed with the client portion of the visit
  - Zoom call with clients
  - Phone call with clients
  - Agency submits vignettes or survey copies/results
Next Steps

- You will receive copies of the Mid-Year Evaluation and other process documents
- Once confirmed, Letty will send you the commissioner list
- Items are all saved here: S:\Human Services\Social Service Grant Program\GRANTS ADMIN - SS FY 20-21\Mid-Year Evaluation
Questions?

Thank you!
December 22, 2020

VIA EMAIL AND FEDERAL EXPRESS

Julie Moore, Chair
Dharminder Dewan, Vice Chair
City of Fremont Human Relations Commission
3300 Capital Avenue, Building B
P.O. Box 5006
Fremont, CA 94537-5006

Steve Dollar
Partner
Direct line +1 212 318 3211
steve.dollar@nortonrosefulbright.com
Tel +1 212 318 3000
Fax +1 212 318 3400
nortonrosefulbright.com

Dear Ms. Moore and Mr. Dewan:

We represent PayPal, Inc. ("PayPal"), a licensed provider of money transfer services, and write in response to your letter dated November 4, 2020 (the "November 4 Letter").

As an initial matter, we note that the November 4 Letter references the complaint submitted by Moana Shaiq to the City of Fremont Human Relations Commission ("HRC") against Venmo, LLC. However, Venmo, LLC is no longer a functioning entity. Rather, our client, PayPal, operates Venmo – a mobile payment service that allows account holders to transfer funds to others via a mobile phone application ("Venmo"). To the extent that Ms. Shaiq intends to amend her complaint to identify PayPal as the respondent, we hereby submit this letter response on behalf of PayPal.

PayPal’s Commitment to Diversity

PayPal is a values and purpose-driven company whose beliefs are the foundation for how the company conducts business every day. Further, diversity and inclusion are core values that guide PayPal as a company. PayPal holds itself and employees to the highest ethical standards, empowers an open and diverse corporate culture, and strives to treat everyone who is touched by its business with dignity and respect. For example, in June of this year, PayPal announced a $530 million commitment to support Black and minority-owned businesses and communities in the U.S., especially those hardest hit by the pandemic, to help address economic inequality. As part of its investment, PayPal also bolstered its internal programs to further increase diversity, equity and inclusion within the PayPal community.¹ Through these and other efforts, PayPal emphasizes diversity and inclusion through its culture, and strongly condemns discrimination and harassment against any vulnerable or protected class.

PayPal’s Compliance Requirements

Like other U.S. financial institutions and money transfer services, PayPal is required to comply with regulations and requirements of the U.S. Department of the Treasury, including the Office of Foreign Assets Control ("OFAC"). OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and


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regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. Failure to comply with OFAC regulations can lead to civil fines, criminal penalties, and several other adverse consequences.

PayPal’s OFAC compliance efforts are narrowly tailored to ensure adherence with applicable laws while mitigating, to the greatest extent possible, any inconvenience to customers, and PayPal devotes substantial resources to these efforts. The required work and diligence is important in ensuring that transactions across the platform do not violate OFAC regulations or other laws. PayPal’s screening system generates alerts when a particular transaction hits on one, or more, pre-programmed filters to identify transactions that could potentially contravene laws. PayPal’s compliance and analysis teams work quickly to review the alerts after they are generated and release those transactions that do not potentially contravene laws. In doing so, PayPal strives to balance U.S. government-imposed sanctions requirements with its commitment to financial inclusion, working to ensure that customers can send and receive payments without undue interruption.

With respect to the specific payment by Ms. Moina Shaiq that referenced “Syria,” PayPal’s investigators acted in accordance with standard operating procedures, as set forth more fully below.

**OFAC Sanctions Programs**

OFAC currently administers more than 25 sanctions programs, including programs that broadly prohibit transactions with or involving sanctioned countries and persons or entities resident therein. The Syria sanctions program is one of the most comprehensive sanctions programs currently implemented by OFAC. U.S. sanctions against Syria began in 2004 and originally targeted only identified individuals and entities affiliated with the Government of Syria, who were added to OFAC’s SDN List. In 2011, U.S. sanctions expanded to broadly prohibit most transactions between the United States and Syria, including persons or entities in Syria, even if they are not identified on the SDN List. However, certain types of activities and transactions which would otherwise be prohibited with respect to Syria have been authorized by general licenses, subject to certain conditions and limitations. For example, U.S. persons may give a charitable donation to U.S. or third-country non-governmental organizations (“NGOs”) in support of their activity in Syria, and U.S. financial institutions can process those funds transfers. However, U.S. persons cannot generally send, and U.S. financial institutions cannot process, charitable donations transferred directly to a Syrian person. As demonstrated by this example, the precise facts and circumstances surrounding transactions with Syria are critical to determining whether transactions are authorized under OFAC regulations.

OFAC vigorously enforces its regulations, and financial institutions are expected to implement a reasonable, risk-based and effective program in place to block or reject a transaction which would otherwise violate or evade sanctions requirements. Notwithstanding this risk-based approach, violations of U.S. sanctions are held to a strict liability standard, and the consequences for breaching OFAC regulations are severe. U.S. financial institutions that permit payments in violation of the Syria sanctions are subject to potential criminal fines of $1 million per violation,
and/or 20 years in prison, for willful violations, as well as civil monetary penalties of up to $307,922 per violation, or twice the amount of the underlying transaction, whichever is greater.

For example, in April 2019, as part of a combined $1.1 billion settlement with federal, state, local, and United Kingdom government partners, OFAC announced a $639 million penalty with Standard Chartered Bank ("SCB") to settle its potential civil liability for apparent violations of U.S. economic sanctions, including the Syria sanctions program. From June 2009 until May 2014, SCB was alleged to have engaged in 9,335 transactions totaling $437,553,380 that were processed to or through the United States. All of these transactions involved persons or countries subject to comprehensive sanctions programs administered by OFAC (including Myanmar, Cuba, Iran, Sudan, and Syria).

**PayPal’s OFAC Policies**

OFAC has issued guidance to ensure compliance with its regulations. PayPal’s sanctions compliance framework has been designed in accordance with these guidelines. PayPal’s program undergoes regular review and careful consideration is given to ensuring it is designed and functions in a way that complies with OFAC requirements, but does not discriminate against any one group of persons or conflict with PayPal’s commitment to diversity and inclusion. PayPal screens for compliance with OFAC sanctions using an industry standard screening application to compare transaction data against individuals and entities on the OFAC lists, as well as to identify potentially prohibited transactions involving comprehensively sanctioned countries. This includes screening payment notes for references to certain sanctioned countries, individuals, and entities. PayPal subsequently takes follow up actions when a match cannot otherwise be discounted. If an alert generates a score above the chosen threshold — for example, because it is an exact match — the alert is subject to a manual sanctions review by an experienced global financial crimes analyst.

For example, although OFAC regulations broadly prohibit most transactions between the U.S. and Syria or people in Syria, U.S. persons are authorized to engage in certain limited transactions, including to send noncommercial, personal remittances to persons ordinarily resident in Syria. However, OFAC defines “noncommercial, personal remittances” to exclude charitable donations of funds to or for the benefit of an entity or funds transfers for use in supporting or operating a business, including a family-owned business, and U.S. persons must ensure that remittances are not made by, to, or through the Government of Syria or any other person whose property and interests in property are blocked pursuant to 31 C.F.R § 542.201(a). Similarly, U.S. persons may give a charitable donation to U.S. or third-country NGOs in support of their activity in Syria, and U.S. financial institutions can process funds transfers on behalf of those NGOs in support of certain authorized activities in Syria, provided the transactions do not involve the Government of Syria or another blocked party. However, U.S. persons cannot generally send, and U.S. financial institutions cannot process, charitable donations transferred directly to Syria or to a Syrian person. Furthermore, it is not permissible for a U.S. person to send funds to another individual in the U.S. who will then provide the funds directly to an individual in Syria as part of a charitable donation. Accordingly, PayPal must confirm the specific purpose and recipient of such transfers before processing the transactions, and works closely with its customers to ensure compliance with OFAC regulations.
Application of PayPal's OFAC Policies to Ms. Shaiq's Transaction

The $100 transfer made by Ms. Shaiq on June 3, 2020 referenced "Syria." No additional information was included in the payment instruction. After the payment was flagged, Ms. Shaiq provided the additional information "Syrian Refugees" in the application response. PayPal's investigators did not close Ms. Shaiq's account or place burdensome restrictions on the customer's use of her account. Instead, in accordance with standard operating procedures, the investigators asked Ms. Shaiq to provide additional information to help PayPal determine whether the payment is permissible under U.S. law. Consistent with PayPal's long-standing process, PayPal simply requested a detailed explanation of the purpose of payment and more information about the ultimate recipients of the customer's funds.

When Ms. Shaiq explained that she was sending money to her brother who would then transfer the funds to Syrian refugees, PayPal contacted Ms. Shaiq's brother (the "Counterparty") to request additional information about these fundraising efforts and whether any non-governmental organizations were involved. This investigation was not overly broad – in fact, OFAC expects financial institutions to verify information from counterparties when the purpose of payments is unclear, or when additional information is needed to determine if one or more of OFAC's general licenses might permit an otherwise impermissible payment. With respect to Ms. Shaiq's transaction, PayPal contacted the Counterparty six times between June 3, 2020 and June 24, 2020 with the aim of resolving this matter expeditiously, per Ms. Shaiq's wish. Because the Counterparty never responded with additional information, PayPal was unable to lift its hold on the transaction.

On October 23, 2020, the transaction was cancelled because PayPal had not received enough information from the Counterparty, and funds in the amount of $100.00 were added to Moina Shaiq's Venmo account balance. On that same day, Ms. Shaiq received an email, which stated: "Venmo's Compliance Department is returning your payment to you." As of December 9, 2020, these funds remain in her Venmo account balance and are available for use or withdrawal to Ms. Shaiq.

PayPal did not take overly broad or discriminatory action – in fact, it was quite the opposite. PayPal worked diligently to confirm the specific purpose and nature of the transaction, and engaged in targeted outreach with Ms. Shaiq and the Counterparty to obtain additional information that would help it resolve any uncertainty as to the permissibility of the payment. Importantly, PayPal did not immediately block or reject the transaction during the pendency of this review, nor did it ever restrict or suspend the accounts of Ms. Shaiq or the Counterparty. Both Ms. Shaiq and the Counterparty have been allowed to transact freely on PayPal, even as PayPal investigated the payment.

In her complaint, Ms. Shaiq asserts that the payment was flagged because Syria has been unfairly targeted by the U.S. government, and that flagging the payment on this basis is discriminatory. To the extent that U.S. sanctions against Syria, or any other sanctioned administered by OFAC, disproportionately impact Muslim entities, names, or groups, Ms. Shaiq's claim is not appropriately directed to PayPal. PayPal has absolutely no control over the Syria sanctions program or other sanctions administered by OFAC. Moreover, PayPal can, and does, process transactions that reference "Syria" but which are not prohibited under U.S. law. In such instances,
PayPal strives to avoid any disruptions to customers by seeking additional information from them, in the hopes that it can promptly release payments that are not prohibited. In this circumstance, PayPal did not receive the requested information which would have allowed PayPal to make a determination on whether the payment was, in fact, permissible.

Contrary to the claims made in Ms. Shaiq’s complaint, PayPal is committed to complying with all applicable laws while seeking to minimize instances in which it reaches out to customers, when possible. PayPal goes to exceptional lengths to get additional information from its customers before confirming transactions as prohibited and reporting them to OFAC, as required by law.

We are available to discuss if you have any questions.

Very truly yours,

Steve Dollar
SMD/NR

cc: Suzanne Shenfil – Director, Human Services