



Memorandum

TO: RULES AND OPEN
GOVERNMENT COMMITTEE

FROM: SUSANA ALCALA WOOD
City Attorney

SUBJECT: Waiver of Revolving Door
Restrictions

DATE: April 23, 2026

RECOMMENDATION

1. Consider the request by Diana Alanis, former Council Community Relations Director for Councilmember Bien Doan, for a Waiver of the Revolving Door Restrictions based on Ms. Alanis' April 2, 2026 Waiver Request Letter, and
 - a. Grant the waiver request upon making findings, including those set forth in this memorandum, that such waiver is in the City's best interest and consistent with the purpose of San José Municipal Code Chapter 12.10; or
 - b. Deny the waiver request if unable to make findings, including those set forth in this memorandum, that such waiver is in the City's best interest and consistent with the purpose of San José Municipal Code Chapter 12.10; and
2. Forward the request and recommendation to the City Council for consideration on the May 5, 2026 City Council agenda.

OUTCOME

If the City Council approves the waiver, Diana Alanis may represent Canyon Snow Consulting, LLC and its clients, including LS Power, before City departments and City elected officials on matters related to City business, including climate goals and power supply reliability.

BACKGROUND

The City Council adopted [Ordinance No. 28074](#) on June 26, 2007, revising San José Municipal Code (SJMC) Chapter 12.10 – Revolving Door Restrictions. As defined in [Municipal Code Section 12.10.010](#), the purposes of the revolving door restrictions are:

- A. To assure the independence, impartiality and integrity of City officials and designated employees in making governmental decisions and taking governmental actions;
- B. To prevent such former officials and designated employees from using their positions with the City for personal gain; and
- C. To prevent private for-profit business entities from obtaining a real or perceived unfair advantage in dealing with the City by hiring former officials and designated employees.

Under [Municipal Code Section 12.10.030](#), former officials and designated employees are prohibited for one year after leaving City employment from:

- A. Working on any legislative or administrative matter on which they worked or that was within their area of responsibility during the prior 12 months;
- B. Representing others before the City Council, boards, commissions, or City staff; and
- C. Receiving certain gifts or payments from involved parties.

The [ordinance includes limited exceptions](#) and allows the City Council to grant a waiver if it finds the waiver is in the City's best interests and consistent with the purposes of the ordinance. The City Council's process includes review and recommendation by the Rules and Open Government Committee.

ANALYSIS

Diana Alanis served as Council Community Relations Director in the District 7 office for approximately one year and five months (October 2024 to March 2026). Prior to that, she served in a similar role for District 6 from July 2018 to October 2024.

In the District 7 office, Ms. Alanis' work included parks and recreation services, libraries, housing and unhoused issues (including Emergency Interim Housing), transportation and traffic safety (including Vision Zero), code enforcement, public safety coordination, and school and neighborhood engagement.

Ms. Alanis began her role as Community Relations Associate with Canyon Snow Consulting, LLC on March 9, 2026. Her work includes representing clients such as LS Power on City-related matters, including supporting the City's climate goals and improving power supply reliability. Ms. Alanis has indicated that she did not work on

matters related to LS Power or her current clients during her City employment and does not anticipate working on policy matters beyond those described.

If the Rules Committee finds that there is basis to grant the waiver, the following findings may support such action:

- Ms. Alanis will represent clients, including LS Power, on matters related to City priorities such as climate goals and energy reliability;
- Ms. Alanis did not work on matters involving her current clients during her tenure with the City; and
- Based on her prior policy areas and experience, granting the waiver could benefit the City by allowing informed engagement on issues aligned with City priorities, consistent with the purposes of Chapter 12.10.

CONCLUSION

The Rules Committee may recommend granting the waiver if it finds that doing so is in the City's best interests and consistent with the purposes of San José Municipal Code Chapter 12.10. The Committee's recommendation will be forwarded to the City Council for consideration.

CEQA

Not a Project, File No. PP17-008, General Procedure & Policy Making resulting in no changes to the physical environment, Title 12 (Ethics Provisions).

/s/ Neelam Naidu
NEELAM NAIDU
Senior Deputy City Attorney

For questions, please contact Neelam Naidu, Sr. Deputy City Attorney, at 408-535-1900.

Attachment:

- April 2, 2026 Diana Alanis Request for Waiver of the Revolving Door Prohibitions