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April 2, 2026

To: Ms. Brooke Jenkins, San Francisco District Attorney

Re: Housing [Fraud and Discrimination] Practices of the San Francisco Mayor's Office of Housing and Community Development.

My name is Mr. Allison Barton Rice (simple background, **not** why I am contacting you here) — I am the Plaintiff[-Appellant] in *Rice v. City and County of San Francisco* (CCSF), which is currently with the Court of Appeals for the Ninth Circuit, regarding violations of my disability rights under the Fair Housing Act (FHA) by fraudulent means committed by CCSF employees in the Mayor's Office of Housing and Community Development (MOHCD) and the City Attorney's Office.

The reason I am contacting you, **for your attention:** In my personal and independent research, on or about January 10, 2023, I discovered (from an auditor's perspective) alarming facts and information about the "Limited Equity Home Ownership Program" (LEHP) which I was a participant in — as follows:

While researching information on San Francisco, housing, BMRs, etc., I came upon a paper entitled '*Creating Equity and Stability for Lower-Income San Franciscans Through Homeownership*' (available on the internet) - by Carolina Reid and William Wilcox of Turner Center for Housing Innovation, University of California, Berkeley. Which, apparently, was produced for Fannie Mae and released (dated) 3.26.20 - most information appears to be from 2019.

From that paper:

Page 15, **Appendix A: Methodology**

“This research was conducted using a mixed methods approach based on data analysis of census, tax assessor and **internal data from MOHCD** as well as interviews and analysis of program documents. As part of this research a broad selection of **individuals involved** in these types of programs were interviewed including officials at GSEs, mortgage loan originators working with the program from depository institutions and independent mortgage lenders, experts on shared equity homeownership programs, homeownership advocates, and **staff at MOHCD**. The research used tax parcel data from the Land Vision database to supplement **internal data supplied by MOHCD** in order to effectively analyze length of tenure, sale prices and appreciation of properties in the program. That research was supplemented by earlier reports on the program [(i.e. LEHP)] as well as **careful review of MOHCD’s program documents and relevant sections of the San Francisco City Planning Code**.

We would like to thank the following individuals who took the time to provide their expertise for this research: Nelson Wong at Umpqua Bank, Sean Crowley at Union Bank, Brett Theodos at the Urban Institute, Sandra Smith at Guild Mortgage, Shannon Way at Homeownership SF, as well **Cissy Yin<sup>1</sup>, Jackie Tsou and Maria Benjamin** at the San Francisco Mayor’s Office of Housing and Community Development.” (Emphasis added)

Page 5, penultimate paragraph:

“All **resales** must go through SF-MOHCD’s marketing and lottery process, similar to new units. About **30-50 BMR units are resold every year** now, representing a small fraction of the overall number<sup>2</sup> of units in the program. Previously it was a smaller portion of units but as the size of the program’s portfolio has grown, so has the number of resales.” (Emphasis added)

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<sup>1</sup> “Cissy Yin” (Director, Homeownership Programs, MOHCD), in an extensive search of CCSF employee public records, I could not find any evidence “Cissy Yin” is Yin’s legal name or that a “Cissy Yin” is employed by CCSF. I do not know what Cissy Yin’s true name is, nor do I know what name she is employed by. From my research, I do know that she is a Chinese citizen that came to San Francisco via the United Kingdom, but I do not know her U.S. resident status.

<sup>2</sup> Approximately 2,500 units in the LEHP.

In the paper ‘*Creating Equity and Stability for Lower-Income San Franciscans Through Homeownership*’ is the following, and extraordinary, statistic which the paper glosses over. Furthermore, I called and spoke with Carolina Reid about this matter — her only thought or consideration was that [generally] Asian’s are more prepared or focused (or something of that nature) on home ownership as compared to [all] other Race/Ethnic groups.

- From the paper, page 7:

**Table 3: Demographic Profile of SF’s BMR Program [(i.e. the LEHP)] Participants — Households by Race/Ethnicity:**

<b>Asian</b>	<b>55.2</b> [percent] (Emphasis added)
White	26.7
Latino	7.7
Multi-Racial	2.1
Black	1.9
Not stated	6.4

- From <https://www.populationu.com/cities/san-francisco-population>:

2019 population of San Francisco by Race/Ethnicity:

White	45.2 [percent]
Black	5.5
<b>Asian</b>	<b>34.9</b> (Emphasis added)
Hispanic	15.2
...	

- Statistical comparison (in percentages):

	SF demographic	BMR [LEHP] demographic
<b>Asian</b>	<b>34.9</b>	<b>55.2</b>
White	45.2	26.7
Latino	15.2	7.7
Black	5.5	1.9

**From a statistical / auditing perspective, the Asian BMR demographic is extremely unlikely to happen naturally. That is, this particular statistic indicates an extreme likelihood of fraudulent action(s) (i.e. manipulation) by SF-MOHCD employees in the SF-MOHCD's marketing and lottery process — [important] for resales of BMRs — in the LEHP and, perhaps, elsewhere.**

**Please note, the lottery process in the sales of new BMRs in the LEHP is a public process, etc. In the *resales* of BMRs, the process is essentially behind closed doors. Furthermore, that resale “process” includes the dissemination of information, the applications and the processing of those applications, etc.**

**In any case, as stated, from a statistical / auditing perspective, the Asian BMR demographic is extremely unlikely to happen naturally. That is, I can think of no plausible explanation other than some type of fraudulent manipulation.**

Humbly and Respectfully submitted for your utmost consideration for action,

*/s/ Allison Barton Rice* April 2, 2026

Mr. Allison Barton Rice