

Multilingual Newsletter Content Analysis

1760 Bush Street Tenant Association

December 18, 2025

Prepared for:

Helen Hale, Director of Housing Services

Mayor's Office of Housing and Community Development

Analysis Date: December 24, 2025

Executive Summary

This analysis compares three versions of Tenant Association President Margaret McNulty's December 18, 2025 newsletter distributed simultaneously to residents of 1760 Bush Street in Russian, English, and Chinese.

Critical Finding: The Russian-language version contains a substantial section calling for witnesses against a specific resident that was deliberately excluded from both the English and Chinese versions published the same day. This was not a correction or revision - all three versions were distributed simultaneously on December 18, 2025.

Regulatory Implications: This deliberate, premeditated publication of different content to different language groups demonstrates strategic targeting of non-English speaking residents, abuse of official position, violation of federal tenant organizing protections (24 CFR Part 245), and calculated manipulation of vulnerable populations through language barriers.

Context

- **Distribution Date (All Versions):** December 18, 2025
- **Languages Published:** Russian, English, and Chinese (simultaneous distribution)
- **Author:** Margaret M. McNulty, Tenant Association President
- **Distribution Method:** Posted in building common areas and distributed to residents
- **Key Issue:** Russian version contains harassment section deliberately excluded from English and Chinese versions distributed the same day

Detailed Content Comparison

The following tables compare the Russian and English versions of the December 18, 2025 newsletter, both distributed simultaneously on the same day. This demonstrates deliberate, premeditated targeting of specific language groups rather than editorial revision.

1. Personal Harassment Section (CRITICAL)

Russian Version (Dec 18, 2025)	English Version (Dec 18, 2025)
<p>P.S. NOTE:</p> <p>"PLEASE BE ADVISED THAT I'VE HAD TO TAKE MEASURES FOR PROTECTING MYSELF FROM FURTHER INCIDENTS OF HARASSMENT AND STALKING BY A DISORIENTED RESIDENT WHO PROJECTS THEIR DIFFICULTIES ONTO ME."</p> <p>"I LOVE YOU ALL EQUALLY BUT I MUST SAFEGUARD MY WELLBEING AND SO I HAVE."</p> <p>"IF YOU SEE OR HEAR ANY ACTIVITIES INVOLVING SLANDER OR DEFAMATION AIMED AT ME PLEASE REPORT IT TO YOUR NEIGHBORS."</p>	<p>[SECTION COMPLETELY REMOVED]</p>

Analysis: This section was deliberately included ONLY in the Russian version while being simultaneously excluded from the English and Chinese versions distributed the same day. This represents premeditated, strategic targeting of non-English speaking residents who may not have full context or access to legal proceedings. McNulty made a conscious choice about which populations would receive which content on December 18, 2025.

2. Election Notice Timeline Defense

Russian Version (Dec 18)	English Version (Dec 18)
"YES! 30 DAYS NOTICE IS THE NORM, THE HUD GUIDELINE, FOR POSTING ANNOUNCEMENTS REGARDING UPCOMING NOMINATIONS AS WELL AS NOTICES ANNOUNCING UPCOMING ELECTIONS."	"YES! 30 DAYS NOTICE IS THE NORM, THE HUD GUIDELINE, FOR POSTING ANNOUNCEMENTS REGARDING UPCOMING NOMINATIONS AS WELL AS NOTICES ANNOUNCING UPCOMING ELECTIONS."
"IN OUR SPECIFIC CASE, WHEN OUR UPCOMING NOMINATION MEETING WAS ANNOUNCED, IT WAS POSTED FOR 28 DAYS."	"IN OUR SPECIFIC CASE, WHEN OUR UPCOMING NOMINATION MEETING WAS ANNOUNCED, IT WAS POSTED FOR 28 DAYS."
"THIS WAS DUE TO SCHEDULING AROUND THE MEMORIAL DAY WEEKEND AND DUE TO THE AVAILABILITY OF THE MODERATORS SCHEDULE."	"THIS WAS DUE TO SCHEDULING AROUND THE MEMORIAL DAY WEEKEND AND DUE TO THE AVAILABILITY OF THE MODERATORS SCHEDULE."

Analysis: IDENTICAL in both versions. McNulty admits to violating 24 CFR § 964.130(a)(5) which requires a minimum of 30 days notice. Her claimed justifications (holiday weekend, moderator availability) are not recognized exceptions under federal regulations. She claims verbal HUD approval but provides no written documentation even 18+ months after the June 2024 election.

3. Lockbox Distribution Status

Russian Version (Dec 18)	English Version (Dec 18)
"LOCKBOXES ARE BEING DISTRIBUTED FROM NOW UP UNTIL OUR PARTY SO MAKE YOURSELF AN EXTRA HOUSE KEY AND YOU'LL NEVER GET LOCKED OUT AGAIN!"	"ATTENTION: WE'VE HIT A SNAFU IN REGARDS TO THESE. I'LL UPDATE YOU AT PARTY"

Analysis: Even minor operational details vary between language versions distributed on the same day. This demonstrates that McNulty prepared deliberately different content for different language populations, not a single document translated equally. The variations show conscious editorial choices about what each language group would receive.

Key Findings

1. **Premeditated Language Targeting:** McNulty deliberately prepared and distributed different content to different language groups on the same day (December 18, 2025). The inflammatory, defamatory content calling for witnesses was intentionally included in the Russian version while being simultaneously excluded from English and Chinese versions. This was not a correction or revision - it was strategic, premeditated targeting from the outset.
2. **Exploitation of Language Barriers:** The targeted Russian-speaking population may not have full context of: (a) Judge Judy's dismissal of McNulty's prior case against Angel Rittenburg for lack of evidence, (b) Angel Rittenburg's federally protected tenant organizing rights under 24 CFR Part 245, or (c) the dismissed court petition from February 18, 2025.
3. **Deliberate Content Differentiation:** McNulty did not publish a single newsletter and then revise it - she prepared multiple versions with strategically different content for simultaneous distribution on December 18, 2025. This demonstrates calculated decision-making about which populations would receive inflammatory content and which would not, revealing intent to exploit language barriers for targeting purposes.
4. **Witness Solicitation:** The phrase "IF YOU SEE OR HEAR ANY ACTIVITIES INVOLVING SLANDER OR DEFAMATION AIMED AT ME PLEASE REPORT IT TO YOUR NEIGHBORS" constitutes solicitation of witnesses against a specific resident through official tenant association communications.
5. **Abuse of Official Position:** McNulty is using her official role as Tenant Association President to distribute personal attacks and solicit support against a resident who has exercised federally protected tenant organizing rights.
6. **Ongoing Regulatory Violations:** McNulty continues to defend the 28-day election notice violation (vs. required 30 days under 24 CFR § 964.130(a)(5)) claiming verbal HUD approval without providing written documentation 18+ months after the June 2024 election.

Regulatory & Legal Implications

Federal Tenant Organizing Protections (24 CFR Part 245)

Angel Rittenburg's activities are explicitly protected under federal tenant organizing regulations, which prohibit intimidation and retaliation against residents who:

- Distribute information to tenants
- Conduct surveys
- File complaints with HUD and housing authorities
- Challenge tenant association governance violations

Election Procedure Violations (24 CFR § 964.130)

Requirement: "All voting members of the resident community must be given sufficient notice (at least 30 days) for nomination and election."

McNulty's Admission: Posted nomination notices for only 28 days, claims verbal HUD approval without documentation.

Consequence (24 CFR § 964.130(b)): "If a resident council fails to satisfy HUD minimum standards for fair and frequent elections... HUD shall require the HA to withdraw recognition of the resident council and to withhold resident services funds."

Hostile Housing Environment

McNulty's campaign of harassment through official newsletters creates an intolerable hostile housing environment for senior/disabled residents exercising their federal rights. This pattern includes:

- Immediate removal from elected position (June 26, 2024 - one day after election)
- Filing restraining order petition with fabricated allegations (dismissed by Judge Judy)
- Soliciting witnesses in foreign-language newsletters targeting vulnerable populations
- Filing to renew restraining order (December 9, 2025) with claims of "21 instances" but no supporting documentation

Conclusions

The evidence demonstrates a systematic pattern of abuse of official position by Tenant Association President Margaret McNulty, including:

7. **Premeditated, deliberate manipulation** of multilingual communications through simultaneous distribution of different content to different language groups on the same day (December 18, 2025), showing calculated targeting rather than editorial error
8. **Strategic targeting** of vulnerable populations who may lack full legal and regulatory context
9. **Witness solicitation** against a resident exercising federally protected tenant organizing rights
10. **Ongoing misrepresentation** of federal election requirements with false claims of HUD approval
11. **Creation of hostile housing environment** through systematic retaliation and harassment

Recommendation: MOHCD should investigate these violations and determine whether McNulty's actions warrant removal from the Tenant Association presidency and whether the June 2024 election should be invalidated due to procedural violations.

Prepared by: Angel Rittenburg

Apartment #412, 1760 Bush Street, San Francisco, CA 94109

Date: December 24, 2025