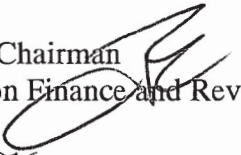


Exhibit 15

COUNCIL OF THE DISTRICT OF COLUMBIA
Committee on Finance and Revenue
The John A. Wilson Building, 1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Memorandum

To: Ellen Efros

From: Jack Evans, Chairman
Committee on Finance and Revenue 

Date: March 28, 2016

Subject: Opinion on recusal

I am writing to request your opinion as to whether I must recuse myself, due to my employment at the law firm of Manatt, Phelps & Phillips, LLP, from signing the attached letter requesting the repeal of a provision of the New Columbia Statehood Initiative and Omnibus Boards and Commissions Reform Amendment Act of 2014. I do not represent interested parties affected by this provision of the D.C. Official Code; however, such clients are retained by partners at my law firm. As I wish to avoid any conflict of interest, I would appreciate a formal opinion from you as to whether I should recuse myself from this matter.

With respect to this topic in a broader context, I am requesting a meeting with you to discuss to what extent my position at Manatt requires me to recuse myself from various matters considered before the Council of the District of Columbia. A few partners of my firm represent clients with matters considered before the Council. I would greatly appreciate your insight and guidance with respect to when and on what matters I shall recuse myself so as to prevent any potential conflict of interest. Additionally, I ask for your advice on whether I should seek a formal opinion from the Board of Ethics and Government Accountability on this topic.

Thank you for your time and for your assistance on this matter. Please do not hesitate to contact me so that we may coordinate a time to further discuss this topic.

Cc: Nyasha Smith, Office of the Secretary