



San Francisco Ethics Commission

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February 22, 2022
By Electronic Mail Only

The Honorable London Breed, Mayor
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Ethics Commission FY23 Budget Request

Dear Mayor Breed:

The corruption scandals that have unfolded over the past two years have served to severely undermine public confidence in the City and County of San Francisco and its ability to deliver services that are equitable, transparent, and accountable to the public. At a time when San Francisco continues to grapple with multiple public crises of immense complexity, including the COVID19 pandemic, restoring confidence in local government institutions is paramount to addressing these issues effectively.

Restoring confidence takes a focused and sustained long-term effort to strengthen workplace culture and change key aspects of how we collectively do the public's business. With its voter-mandated mission to practice and promote the highest standards of integrity in government and its unique duty to promote public service that builds public trust, the Ethics Commission shares your goals for the FY23 budget to continue to address both accountability and equity in the delivery of programs, services, and spending.

Toward that end, the Commission's proposed FY23 budget seeks to ensure the continuity of core transparency, compliance, and oversight functions of the department that are essential for promoting governmental accountability. Importantly, the budget also prioritizes building the capacity necessary for the Commission to deepen civic and community engagement with its programs and policy initiatives to magnify the reach, effectiveness, and impact of that work citywide. To do this, the proposed budget would provide dedicated new resources to create and sustain new methods to ensure broad stakeholder perspectives are consistently engaged and integrated into the development and evaluation of data disclosure tools, compliance guidance approaches, and policy analysis and review processes.

To ensure this work can be undertaken, the Commission seeks an operational budget for FY23 totaling \$7.6 million, which represents a 10.4 percent growth over its current base operating budget.

The Ethics Commission remains energetically committed to doing its part to tackle the challenges of the current moment and to advance public trust in the coming year to help ensure that the City is an organization in which corrupt practices cannot take root.

Sincerely,

LeeAnn Pelham

LeeAnn Pelham, Executive Director

I. Mission, Function, and Organization

Created directly by the City's voters with the passage of Proposition K in November 1993, the Ethics Commission is composed of five members, with one each appointed by the Mayor, the Board of Supervisors, City Attorney, District Attorney and the Assessor-Recorder. Unless appointed to fill a vacancy for an unexpired term with less than three years remaining, no Commissioner may serve more than one six-year term. The Commission appoints the Executive Director, who serves at the will of the Commission. As the department's chief executive, the Director has authority to appoint and remove other employees of the Commission subject to the civil service provisions of the Charter.

Through its staff, the Commission is responsible for the independent and impartial administration and enforcement of laws related to campaign finance, governmental ethics, conflicts of interests, and registration and public disclosure reporting by lobbyists, campaign consultants, permit consultants, and major developers. The Commission also administers a \$7 million Election Campaign Fund that provides partial public financing for qualified candidates for City elective office.

The Commission acts as filing officer for over 80 different types of public disclosure statements; audits statements for compliance with state and local laws; investigates complaints alleging ethics and political reform law violations; raises public awareness of these laws; researches and proposes legislative changes; and provides guidance and advice about the applicability of the City's political reform laws to City candidates, officers, employees and the general public. Together with its staff, the Commission works to effectively implement the laws within its jurisdiction, and to ensure those laws are strong, workable in practice, and enforceable.

Structurally, the Commission's programs are organized into six functional divisions, with the Commission's 33 current staff positions distributed as shown in Attachment A.

The Commission's ongoing departmental priorities are:

- Strong laws, well implemented, with timely and effective oversight and accountability to enhance the impact of core Commission programs.
- Heightened awareness of the laws through organization-wide focus on practical tools and information, essential outreach, and accessible public disclosure to enhance understanding, promote improved compliance, and foster equitable and meaningful public engagement.
- Organizational excellence through continuous improvement, transparency, and accountability for the Commission's work. Implement program and business process improvements and re-calibrate services as needed to maximize impact.

II. **Ethics Commission FY23-FY24 Departmental Budget Proposal Overview**

ETH Annual Operating Budget Requests	FY23	FY24
Position Related Requests		
Reclassify existing 1042 <i>IS Engineer</i> position to 1043 <i>Senior IS Engineer</i> position in FY23 Continue funding this position, which expires in FY24, as a three-year limited term exempt reclassified 1043 position starting in FY24	\$20,226	\$232,312
Continue funding 1840 <i>Client Support Specialist</i> position, which expires in FY24, as a three-year limited term exempt position starting in FY24	-	\$132,860
Reclassify existing 1823 <i>Senior Policy Analyst</i> position to 1824 <i>Policy and Legislative Affairs Manager</i> position starting in FY23	\$25,401	\$25,240
Reclassify existing 1822 <i>Policy Analyst</i> position to 1823 <i>Senior Policy Analyst</i> position starting in FY23	\$24,137	\$23,996
New 1823 <i>Civic and Community Engagement Specialist</i> as a three-year limited term exempt position starting in FY23	\$145,364	\$183,823
New 1823 <i>Policy Implementation Specialist</i> as a three-year limited term exempt position starting in FY23	\$145,364	\$183,823
New 1823 <i>Senior Auditor</i> as a three-year limited term exempt position starting in FY23	\$145,364	\$183,823
New 1454 <i>Executive Secretary</i> as an exempt position starting in FY23 to function as <i>Commission Secretary</i>	\$99,880	\$161,044
Total	\$605,736	\$1,126,921
Non-Position Related Requests		
Non-Personnel Services - Software Licenses	\$25,936	\$33,936
Non-Personnel Services - Systems Consulting Services	\$3,510	\$7,125
Materials and Supplies	\$66,812	\$42,612
Total	\$96,258	\$83,673
Services of Other Departments		
Department of Technology Contracts	\$19,652	\$23,652
Office of Contract Administration Contracting Services	-	\$50,551
Total	\$19,652	\$74,203
ETHICS COMMISSION (ETH) REQUESTS TOTAL	\$721,645	\$1,284,798
ALLOCATED BASE OPERATING BUDGET	\$6,956,814	\$6,555,296
OPERATING BUDGET WITH ETH REQUESTS	\$7,678,460	\$7,840,094
INCREASE TO OPERATING BUDGET	10.4%	19.6%

III. Ethics Commission FY23-FY24 Departmental Budget Request

As proposed, the Commission's FY23-FY24 budget will allow for the following specific needs to be addressed:

- **Enable continuity of essential public disclosure functions by reclassifying and retaining *Information Systems (IS) Engineer* position**

In its FY21 budget proposal, the Ethics Commission requested a three-year limited term 1042 *Information Systems (IS) Engineer* position in the Electronic Disclosure & Data Analysis (EDDA) division to provide the public with robust access to key disclosure data, enable electronic filing of public disclosures, create data analysis and visualization tools for the public on campaign finance information for city elections, conduct outreach and training for the public on disclosure tools, and automate business processes to maximize operational efficiencies. This position was approved in the Commission's FY21 budget effective January 1, 2021, with funding set to expire on June 30, 2023.

As the Commission continues to make progress on those identified priorities, there is an increased need to perform technical work that is more complex in nature and beyond the scope of the original duties that were envisioned for the 1042 position. This is partly due to lack of capacity in the City's Open Data team to support the Commission's critical disclosure infrastructure, which was previously maintained by that team, and has required the Commission staff to absorb related business processes and provide ongoing monitoring to avoid service disruption for the public. In addition, to comply with the City's growing cybersecurity mandates, the Commission has embarked on an effort to migrate its technology where needed to new platforms that are compliant with City's requirements, including website infrastructure and applications that enable electronic filing. These systems migration efforts are complex and require a significant level of technical planning and implementation to avoid service disruption. The Commission is also in the process of building a complaint case management system to enhance its enforcement operations and facilitate its public reporting on caseloads and the status of complaints. The election campaign dashboards which provide essential campaign finance data to the public also need to be redesigned to provide better data that is more user-friendly. The expanded scope of technology projects required of the EDDA division will require a senior level position with specialized technical and functional expertise to perform work that involves greater level of technical engineering and strategic decision-making. To address these critical and time-sensitive needs, the Commission requests to reclassify the 1042 *IS Engineer* position to 1043 *Senior IS Engineer* position starting in FY23.

As funding for this position is set to expire at the end of FY23, the Commission also requests continued funding for a three-year limited term exempt 1043 *Senior IS Engineer* position starting in FY24. Without this position, the Commission's ability to create campaign dashboard tools for elections, automate and maintain electronic filing processes, enable disclosure data integration

with City's open data platform, implement mandated technology migration projects, maintain new complaint case management system, and conduct community outreach to ensure broad stakeholder perspectives are consistently engaged and integrated into the development and evaluation of data disclosure tools will be severely impacted. To ensure that the Commission can serve its core public disclosure functions with effective technology solutions, this position is critical to retain in the Commission's operating budget for a full three-year term.

Investments:

- Reclassify existing 1042 *IS Engineer* position to 1043 *Senior IS Engineer* in FY23
 - Continue funding this position, which expires in FY24, as a three-year limited term exempt reclassified 1043 position starting in FY24
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- **Strengthen direct support for filing compliance and guidance across all program areas by creating dedicated *Client Support Services Unit***

In its FY21 budget proposal, the Ethics Commission requested and received authorization for a new 1840 *Client Support Specialist* position in the Engagement and Compliance division to support the implementation of electronic filing for all Conflict of Interest Code-designated filers of Form 700 – Statement of Economic Interests, which successfully launched in January 2022. This new process enables roughly 4,000 'designated' City employees who previously filed the form on paper with their respective departments to use the City's online filing system to submit their required financial disclosure statements. This position played a crucial role in the successful roll-out of this system and continues to provide critical technical assistance, compliance guidance, educational materials, and support to departmental filers and to the departmental filing officers responsible for coordinating those filings annually and throughout the year. The funding for this position is set to expire on June 30, 2023.

As a part of the Form 700 e-filing launch, this position was instrumental in establishing and facilitating new business processes and practices in the compliance division that enabled direct streamlined support to filers resulting in better compliance services and greater operational tracking. To address similar needs across program areas and provide focused and streamlined filer assistance to a broader segment of the public with faster and more efficient filer support services, the Commission seeks to establish a dedicated *Client Support Services* unit within the Engagement and Compliance division. This unit will require a new 1840 *Client Support Specialist* starting July 1, 2023 as a three-year limited exempt position to deliver critical technical training, direct filing assistance, educational materials, and outreach to 4700+ Form 700 filers, 80+ departmental filing officers, 200+ lobbyists, 300+ active committees, and other members of the public with Ethics Commission filing obligations to enhance stakeholder understanding of e-filing requirements and processes for effective compliance. This position will also track incoming support requests, resolve issues, help gather stakeholder feedback, and generate ongoing operational data for the program administration team to evaluate programmatic areas that require improvements and make data-driven decisions.

Investments:

- Continue funding 1840 *Client Support Specialist* position, which expires in FY24, as a three-year limited term exempt position starting in FY24
- **Ensure complex policy and legislative work necessary to achieve strong, workable, and effective political reform laws is supported by job classifications that reflect the full nature and level of that work**

Since the 2017 creation of a dedicated Ethics Commission Policy division, the duties of its two policy positions, an 1823 *Senior Policy Analyst* and an 1822 *Policy Analyst*, have significantly expanded to have much broader City-wide responsibility, engagement, and impact. The Policy division performs complex policy analysis, policy development, legislative drafting, and broad stakeholder engagement to support the Commission's core goal of strong and effective laws over which it has jurisdiction to administer and enforce. As the pace and breadth of the Commission's policy and legislative work have only increased, so too have the demands required of this division. This work requires exercise of highly specialized legal and research skills, increasingly necessitated by the complex issues addressed in the Commission's policy work. It also requires application of significant strategic planning and thinking skills, independent sound judgement, strong negotiating and program management skills that have impact on the Commission's operations and others Citywide, beyond the scope of duties that existed when the positions were initially created. It has increasingly become necessary to rely upon these positions for duties that appropriately fall within the scope of higher classifications, including the longer-term planning and coordination of more cross-functional activities related to timely and effective legislative affairs, interdepartmental policy outreach and City-wide coordination, and media communications.

As the level and impact of the work of these positions exceed their current classification levels the Commission seeks to reclassify the existing 1823 position to 1824 *Policy and Legislative Affairs Manager* position and reclassify the existing 1822 position to 1823 *Senior Policy Analyst* position starting in FY23. Rightsizing these positions will ensure effective, comprehensive, and timely planning and execution of multi-faceted initiatives to develop, implement, and evaluate highly complex policy and legislation with broad City-wide impact.

Investments:

- Reclassify the existing 1823 *Senior Policy Analyst* position to 1824 *Policy and Legislative Affairs Manager* position starting in FY23
- Reclassify the existing 1822 *Policy Analyst* position to 1823 *Senior Policy Analyst* position starting in FY23

- **Deepen community engagement in shaping practical and effective public policy solutions by funding a position dedicated to civic and community participation**

To expand the Commission’s ability to conduct community engagement and outreach in its policy development process to inform policy outcomes and achieve their strongest impact, the Commission proposes to add a new 1823 *Civic & Community Engagement Specialist* position as a three-year limited term exempt position starting in FY23. Embedded within the Policy division and collaborating as a key member of the policy analysis and legislative development team, this position will create and lead consistent and sustainable community engagement strategies and approaches to promote regular participation by community and civic stakeholders in assessing the impact of existing, newly enacted, or proposed regulations and legislation in developing recommendations for the Commission. It will ensure the development and effective implementation of a strategic multi-layered stakeholder engagement plan for the Commission’s high-priority policy and legislative initiatives.

This role will take a lead in the Commission’s public-facing efforts to establish and maintain relationships with community stakeholders and proactively create opportunities for outreach and feedback to timely seek their input in developing policy solutions. It will engage in community events to heighten awareness of the Ethics Commission’s mission and its ongoing policy initiatives and develop new communications and online materials on policy initiatives, proposed laws, and adopted legislation to share with community organizations as a platform for further inquiry and engagement. This role will help improve accountability with a focus on engaging broader civic and community organizations as key participants in the Commission’s policy-making processes.

Investments:

- One new 1823 *Civic & Community Engagement Specialist* in the Policy Division as a three-year limited term exempt position starting in FY23

- **Expand community engagement in shaping how new programs and policies are implemented by funding a position in the Engagement & Compliance Division focused on policy implementation practices and communications to maximize policy awareness and impact**

The Commission proposes to add a new 1823 *Policy Implementation Specialist* position in the Engagement & Compliance Division as a three-year limited term exempt position starting in FY23 to provide priority-level operational focus across the Commission’s functional areas to help evaluate proposed new laws and implement new policy projects in close collaboration with Policy staff. Embedded within the Engagement & Compliance Division and collaborating closely with the division’s team of compliance officers and program administrators, this position will create and proactively sustain new opportunities to engage with local communities in raising

awareness of the new programs, policy, and regulations being implemented by the Commission and to expand the impact of the Commission's programs and services. It will develop communications, web content, and online materials to inform the public regarding roll-out of new laws and regulations. It will act as a lead to ensure programmatic and operational insights and stakeholder feedback are consistently integrated into ongoing policy development processes. It will collaborate cross-functionally across divisions, with other City departments, and community stakeholders to identify, design, and implement business process changes, disclosure requirements, and e-filing solutions to maximize the effectiveness of those new initiatives.

Investments:

- One new 1823 *Policy Implementation Specialist* in the Engagement & Compliance Division as a three-year limited term exempt position starting in FY23
- **Strengthen reach and impact of Audit programs by adding a new *Senior Auditor* position to ensure fuller, more timely oversight**

Performing mandatory and discretionary campaign audits, lobbying audits, and candidate public campaign financing qualification and disbursement reviews are all Audit division duties. In the wake of federal and local public corruption investigations, the Controller's June 2020 report on Public Works Contracting recommended, in part, that the Ethics Commission create an annual post-filing review program for the economic interest filings of city officials (Form 700s). This oversight duty is assigned to the Audit division and establishing and conducting that review is an Audit division priority for FY22.

Separately, in its August 2020 audit report on the Ethics Commission, the Budget and Legislative Analyst (BLA) noted the usefulness of the Commission's campaign audits as a significant "tool to detect violations of campaign finance laws..." The report also found that "long review timelines for discretionary audits compromise the effectiveness of this tool." The Commission shares the concern noted in the BLA finding that "a lengthy audit process reduces the relevancy of potential findings for the public, as audits are completed long after the election occurred and also hinders the Department's ability to take enforcement action within the statute of limitations." The BLA report recommended in part that audits from the previous election cycle should be completed before the next election cycle candidate filing period begins, when auditors are needed to determine qualification for the public financing election program.

At present, however, due to ongoing competing priorities and staffing assignments, and the need to also manage the public financing review and disbursement program for the upcoming November 2022 election, the division's current work plan does not allow for discretionary audits to be conducted in connection with the 2020 election. The Audit division has initiated mandatory lobbying audits and is continuing to conduct work on two mandatory campaign

audits from the November 2019 election. Mandatory campaign audits from the November 2020 cycle are slated to begin in March 2022.

The division's capacity to perform more timely audits, conduct discretionary audits, and establish post compliance reviews of Commission programs remains limited with only three 1822 *Auditor* positions. The breadth of projects required of the division requires staffing aligned with the Commission's auditing and growing post-compliance and review responsibilities, including the more senior level position to perform more complex duties that appropriately fall within the scope of that job classification. To help address unmet and emerging programmatic needs and ensure that relevant oversight work can be developed for improved impact and timely execution, a new *Senior Auditor* staff position is necessary as a three-year limited term exempt position.

Investments:

- One new 1823 *Senior Auditor* position as a three-year limited term exempt position starting in FY23

- **Executive Secretary position to help facilitate Commission meetings and perform other Commission support related duties**

The Commission proposes to add a new position authority, an exempt 1454 *Executive Secretary*, to function as its *Commission Secretary* per San Francisco Charter Section 4.102(9). The Commission has not to date had a position dedicated solely to perform administrative and meeting support functions of the five-member Commission. Instead, the department has historically absorbed these functions by distributing them across its staff divisions. In an organization undergoing transformation over the past several years, the Commission took this approach as a conscious step to allow departmental resources to focus first on direct program support and service delivery needs. At the same time, with the continued growth in both the department's programmatic responsibilities and its staffing levels, ensuring a full level of administrative support that provides consistency in coverage can be operationally challenging. Adding this new position will help centralize Commission support responsibilities to achieve operational and programmatic efficiencies across the department. The essential duties of this role are to:

- Coordinate preparation, posting, and distribution of Commission meeting Agenda, Meeting Summary, and Minutes of the Commission's monthly meetings
- Provide Commissioner support for onboarding, training, and technology
- Serve as clerk at regular and special meetings by supporting meeting facilitation, calling out agenda items, monitoring time allotments for public comment, and providing parliamentary support
- Act as a point of contact for the public to provide information regarding the Commission
- Maintain Commission records, information, and correspondence, including notes for preparation of Meeting Summary and Minutes

Investments:

- One new exempt 1454 *Executive Secretary III* position starting in FY23

- **Maintain core business systems by funding essential technology and professional services**

To ensure continuity of critical business operations, the Commission requests funding for essential software tools which includes a ticketing application to track operational and programmatic support issues reported by staff and filers, a software application to build user-friendly electronic forms to enable public disclosures, and a new data visualization tool to re-design and improve campaign dashboards to provide better and user-friendly data to the public. This requires an increase in the *Non-Personnel Services-Software License* account of \$25,936 in FY23 and \$33,936 in FY24.

This proposal also identifies additional funding necessary to meet maintenance cost increases for NetFile e-filing system per consumer price index adjustment. The NetFile system serves critical e-filing and public disclosure functions for the Commission's Form 700, Campaign Finance, and Lobbyist programs. It also supports the administration of the public financing program and campaign consultant program. This request will require an increase in the *Non-Personnel Services-Systems Consulting Services* account of \$3,510 in FY23 and \$7,125 in FY24.

The Commission also requests funding to replace end-of-support laptops and accessories for staff and procure back-up equipment for business continuity. This will require an increase in the *Materials and Supplies* account of \$66,812 in FY23 and \$42,612 in FY24.

Investments:

- Provide funding to procure software tools, professional services, and technology equipment estimated to be a total increase of \$96,258 in FY23 and \$83,673 in FY24

- **Provide necessary support for Commission's core business functions by funding essential services provided by other departments**

This includes funding for technology contracts supported by the Department of Technology (DT) to cover software licensing cost increases as a result of staffing level increase, for office software tools provisioned by DT that are essential for staff to perform their day to day duties. It also includes increase in costs to support DocuSign usage fee for public disclosure e-filings received, and licensing charges for the new complaint case management system and website hosting infrastructure. This request will require an increase of \$19,652 in FY23 and \$23,652 in FY24.

The Commission also proposes to establish a new workorder agreement with the Office of Contract Administration (OCA) to avail support and assistance from OCA regarding City's contracting policies and procedures to secure external auditing contracts in the future as necessary for mandatory audits of publicly financed campaign audits, and for contracts related to technology services. The Commission does not have internal expertise or staffing dedicated to support these contracting functions. With this new work order, the Commission will have the needed resources to secure a timely and consistent level of support from OCA to address its contracting needs. The funding required for work related to audits of publicly-financed candidates is requested to be allocated from the Election Campaign Funds as administrative expenses per Section 1.138(b)(2) in the San Francisco Campaign and Governmental Conduct Code. This is estimated to be \$50,601.38 in FY23. The work related to supporting technology contracts will need to be funded from the operating budget in FY24 which is estimated to be an increase of \$50,551.

Investments:

- Provide necessary funding for DT technology contracts and OCA contracting services estimated to be a total increase of \$19,652 in FY23 and \$74,203 in FY24 to the annual operating budget
- Allocate \$50,601.38 in FY23 from Election Campaign Funds for OCA contracting services

Election Campaign Fund

The Ethics Commission's current budget is comprised of two main components: an operating budget, discussed above in the Budget Proposal section, and the Election Campaign Fund ("Fund"). The Fund is established in the City's Campaign Finance Reform Ordinance ("CFRO"). Under CFRO, the Fund is capped at a maximum of \$7 million. Allocations to the Fund are based on a formula of \$2.75 per resident, unless the Fund has already reached its maximum. Depending on the balance of the Fund in any fiscal year, additional funds may need to be appropriated up to the formula and caps provided in the law.

ATTACHMENT A: ORGANIZATIONAL STRUCTURE AND FUNCTIONAL DIVISIONS

Chart 1 – Current

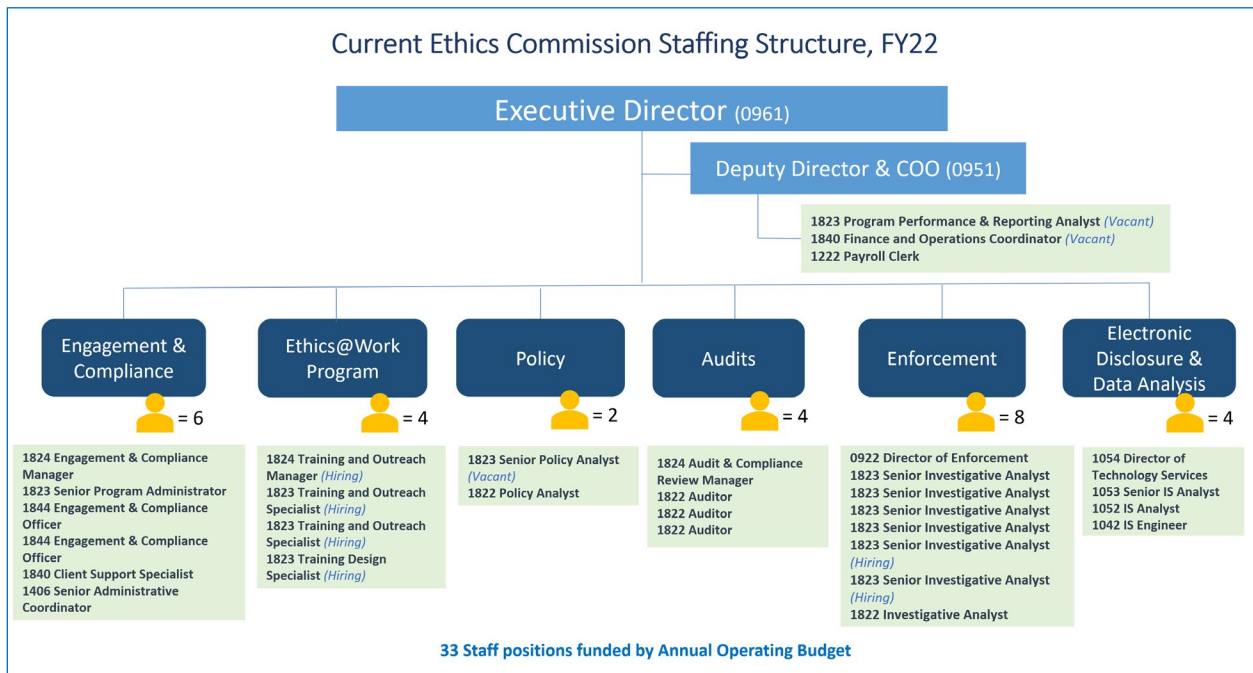
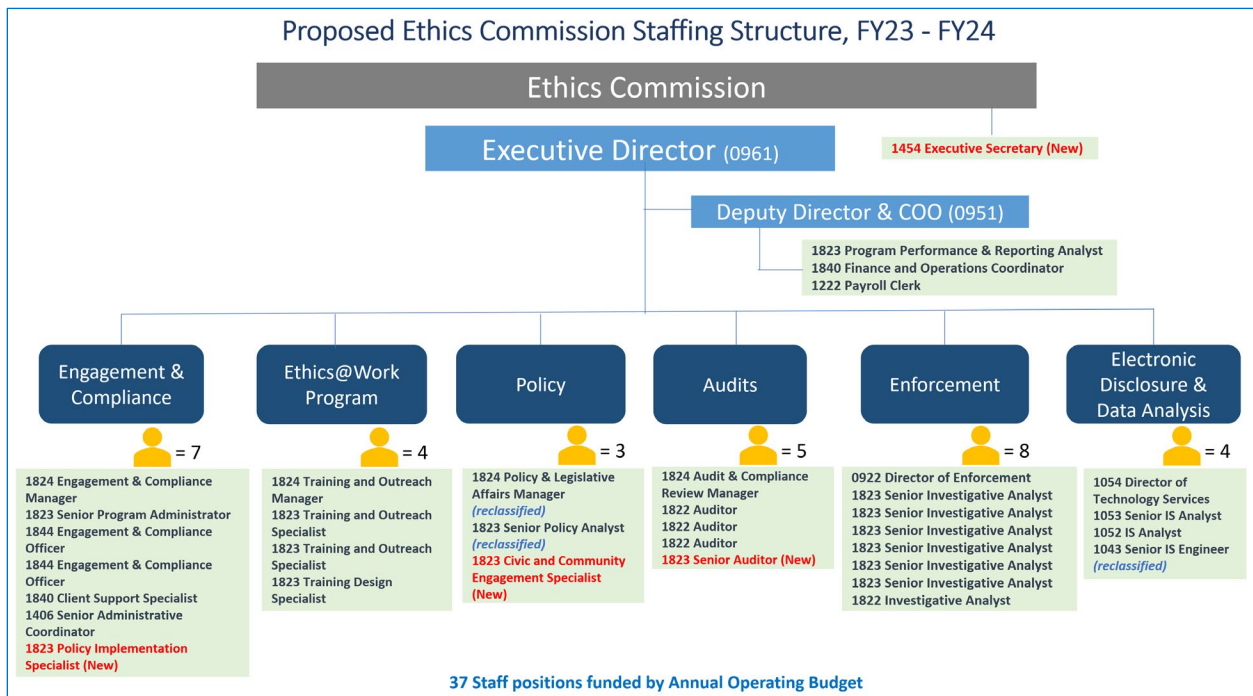


Chart 2 – Proposed



Engagement & Compliance: As part of its duty to promote governmental accountability, the Ethics Commission provides information and guidance to city officers and employees, candidates for public office, the public, and others to help them understand and comply with their responsibilities under the law. The Engagement and Compliance Division publishes compliance materials and provides informal advice that applies the City's ethics, campaign finance, and lobbying laws to circumstances faced in practice. The Commission also acts as filing officer for a wide range of public disclosure statements filed by designated local officials, candidates seeking local office, and lobbyists who seek to influence governmental decisions in the city and County of San Francisco.

Ethics@Work Program: This Division will implement the new Ethics@Work program by creating training and outreach resources necessary to deliver practical education on navigating ethical issues across City departments based on an assessment of specific training needs to promote and support ethical leadership at all levels of departmental decision making.

Electronic Disclosure & Data Analysis (EDDA): This Division serves filers, Commission staff, and the public by providing integrated and effective technology solutions for compliance, agency operations, and access to electronic disclosure records and data. The EDDA Division develops integrated technology solutions to support the Commission's various programs. The Division maintains the electronic disclosure platforms for campaign finance, lobbyist, Form 700, and other filings. The Division also ensures that the public has complete and timely access to the disclosures, such as through the campaign finance data dashboards and the City's open data portal.

Policy: This Division leads the Commission's public policy research, analysis, and legislative work. It is responsible for analyzing how well current laws and programs are achieving their intended purposes and formulating new regulatory and legislative approaches to ensure the City's political reform laws are strong, workable, and enforceable. Related duties assigned to the Division include media relations, interpreting and advising on the law, and stakeholder outreach and engagement. The Division also administers the Commission's opinion and waiver programs.

Audits: To help fulfill the Ethics Commission's oversight function, the Audit Division is responsible for conducting campaign audits pursuant to the Commission's Charter authority and mandate under City law to determine whether committees have materially complied with applicable requirements of State and local laws. The Division also administers the Public Campaign Financing Program qualification and claim review process to determine candidate eligibility and public funds disbursements. In addition, the Audit Division is responsible for conducting audits required under City law related to the lobbyist registration and reporting and for conducting post-filing compliance reviews of other disclosures, such as public economic interest filings by City officials.

Enforcement: To fulfill the Ethics Commission's oversight mandate as an independent administrative enforcement agency, the Enforcement Division is charged with ensuring fair, thorough, and timely investigations and case outcomes that serve as an effective deterrent and promote accountability in government. The Division has responsibility to identify, investigate, and remedy unlawful conduct within the scope of the Commission's jurisdiction. The Division's investigators are responsible for investigating alleged violations of the law to ensure allegations are fully and objectively evaluated and that those who violate the law are held publicly accountable for their actions. This can include imposition of monetary penalties levied by the five-member Ethics Commission as provided for under the law.