

**From:** [Vinay Patel](#)  
**To:** [Ethics Commission, \(ETH\)](#)  
**Subject:** Comment for Special 2/25/22 Ethics Commission Meeting  
**Date:** Friday, February 25, 2022 8:55:17 AM

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My name is vinay patel

I am the executive director of the Asian Pacific Islander Cultural Center

I am writing to voice my strong disapproval and concern over the proposed Ballot Measure to Amend the Campaign and Governmental Conduct code

I have devoted over 20 years of my life fighting for equitable access to resources and cultural equity for our BIPOC community. That could not have been done without the ability to have open dialogue with city departments and elected officials to tell the stories of how inequitable practices have led to harm and pain in our communities. This ability to open dialogue and build trust has led to positive change. That openness has also led to community dialogue that have brought people on opposite sides of issues together.

I have had the privilege of growing up in this wonderful country and that privilege has given me the opportunity to speak about the challenges from my API community to those in positions of power to help them understand the struggles of our community by inequitable laws and practices.

This proposed Ballot Measure has a very serious impact on BIPOC ability to have those conversations. This will become a barrier to BIPOC organizations and especially organizations who are or serve English as a second language persons. These individuals and organizations do not have the historical access or experience to navigate the already complicated nature of working with the government. Now only organizations who have large and vast resources will have the ability to navigate through these conditions. - thus CREATING an unethical and inequitable situation.

We as BIPOC communities need to have open dialogues without the fear of persecution.

We also feel that if filling out forms for every meeting or invite might also be

I urge you to rethink the purpose of this Measure and tailor it specifically to curtail certain actions then please write the legislation to do so. A practice to engage the community first and co write the legislation would help make it clearly understood and bought in law. It will also lead to a legislation that will not have to have so many amendments.

We in the community will also lend help or experience to you to help you understand our stories to help tailor a measure or legislation that can be equitable for all.

I want to thank the staff, and specifically Michael Canning, of the Ethics Commission for reaching out after the last meeting and speaking with me and others. I felt that the staff were doing their best to consider all the different perspectives.

In community  
Vinay

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Vinay Patel  
Executive Director  
API Cultural Center

Join us on Facebook: [API-Cultural-Center-San-Francisco](https://www.facebook.com/API-Cultural-Center-San-Francisco)

**From:** [Gregg Biggs](#)  
**To:** [Ethics Commission, \(ETH\)](#)  
**Subject:** Non-profit comment for today's hearing on non-profit gifts.  
**Date:** Friday, February 25, 2022 12:38:07 PM  
**Attachments:** [image001.png](#)

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Dear Commissioners,

Since I had to log off to host a meeting before the public comments section of today's hearing on agenda item #3 on the proposed ballot measure regulating gifts to public officials, I want to provide my comments in writing below.

My name is Gregg Biggs, Director of Advancement for Edgewood Center for Children and Families, a non-profit agency that provides mental health services to children and families in San Francisco and San Mateo counties. Throughout the year, our agency hosts a number of fundraising, gratitude, and educational events in which we invite representatives of city/county agencies with whom we partner. While modest, there are often benefits of attending these events that could be considered a gift since we do not require the representatives to pay to attend, and the gift would usually include nothing more than food and beverage. Having public partner representatives at these events is often helpful for our board, volunteers, and donors to meet and understand more about our public agency partnerships.

To be penalized for providing such modest amenities to individuals with our public partner agencies would be detrimental to our mission of serving marginalized children and families. While we support more stringent regulations on gifts that address the recent corruption scandals or prevent abuse of offering extravagant gifts to public officials, as written the proposed ballot measure would create a hardship for our work and those of other non-profits in the community.

Appreciatively,  
Gregg

**Gregg Biggs**  
[Director of Advancement](#)  
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Visit our website: [edgewood.org](http://edgewood.org)  
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**From:** [Sean McMorris](#)  
**To:** [Ethics Commission, \(ETH\)](#)  
**Subject:** Public Comment Re: SFEC Ballot Measure Ordinance  
**Date:** Friday, February 25, 2022 9:30:12 AM  
**Attachments:** [02\\_25\\_2022 CCC Statement to the SFEC Re Anti-Corruption Ballot Measure.pdf](#)

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Hello,

Please find attached California Common Cause's public comment for today's (02/25/2022) special meeting of the San Francisco Ethics Commission. Our comments are for agenda item #3.

Sincerely,  
Sean McMorris

Sean McMorris (He/Him)  
Transparency, Ethics & Accountability Program Manager  
California Common Cause  
453 S. Spring St, Suite 401, Los Angeles, CA 90013  
[smcmorris@commoncause.org](mailto:smcmorris@commoncause.org)  
(626) 382-6994

To: San Francisco Ethics Commission  
From: California Common Cause  
Date: Feb. 25, 2022  
Subject: Proposed Amendments to Strengthen the City's Gift and Ethics Laws

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Dear Commissioners,

California Common Cause commends the Ethics Commission and its staff for undertaking the task of overhauling the City and County's ethics laws to better prevent corruption, particularly the type of corruption in San Francisco that has made headlines over the last two years. Based on these recent scandals, it is clear that reforms are needed.

The City has made significant headway on this front with the passage of Proposition F in 2019 and more recently the institution of meaningful behested payments reform. Improving San Francisco's Campaign and Governmental Conduct Code is a natural next step that California Common Cause supports.

We have been in contact with SFEC staff and have reviewed the proposed changes to San Francisco's ethics code. We support the reforms in the current draft ordinance but have one place of disagreement -- specifically with the increased gift-giver liability upon those who are not lobbyists or permit consultants. We understand the desire to hold gift-givers seeking influence accountable, especially amidst current corruption scandals, and we support the concept of restricted sources. However, we have concerns that extending liability to the gift-giver and their affiliates under the broad scope of "doing business with a department" could result in everyday folks, or good actors, unsuspectingly breaking the law and becoming liable.

That said, we support the draft ordinance fully if liability, with the exception of lobbyists and permit consultants, is placed solely upon the City official or employee who is the recipient of the gift. Not only does this eliminate the potential for undue ensnarement of regular community members who are good actors under the law, but we believe it may also result in a more effective and efficiently enforced law. Simply put, chasing down gift-givers and their affiliates who may or may not be bad actors is resource-intensive and inefficient when the Ethics Commission can more effectively address the problem by placing clear and significant liability upon decision-makers under its purview who are regularly trained and know their duties under the law.

To summarize: We support liability for city employees who receive gifts from entities doing business before their departments or from affiliates of entities doing business before their

departments. We hope that by making extremely clear to city employees that accepting gifts from individuals with business before them will result in consequences, you can begin to change the culture within city government.

Notwithstanding all of this, we support the prohibition of gift-giving and liability placed upon lobbyists and permit consultants, as they are parties that are more prone to engage in pay-to-play, and, as registrants with the City, they have a greater obligation to be acquainted with San Francisco's ethics laws.

In closing, California Common Cause applauds the Ethics Commissions' efforts to overhaul the City and County's code of conduct to better address the circumstances that led to recent corruption scandals. Transparency and accountability are cornerstones of a well-functioning democracy, and we believe this initiative ordinance will increase both. Accordingly, we support the draft ballot measure if amended to remove liability on gift-givers, except for lobbyists and permit consultants, and place sole responsibility of adherence to the law upon the City and County officers and officials whose duty it is to know and abide by San Francisco's Campaign and Governmental Conduct Code.

Thank you for your hard, dedicated work to building a better local democracy in San Francisco.

Sincerely,  
Sean McMorris  
Transparency, Ethics & Accountability Program Manager  
California Common Cause  
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[smcmorris@commoncause.org](mailto:smcmorris@commoncause.org)