



San Francisco Ethics Commission

25 Van Ness Avenue, STE 220
San Francisco, CA 94102-6053
ethics.commission@sfgov.org
415.252.3100 | sfethics.org

Lobbying Audit Report:

Rudolph Reyes

Lobbyist ID: SFO-153977

January 1, 2021 – December 31, 2021

Introduction

Public disclosure of the identity and extent of efforts of lobbyists to influence decision-making regarding local legislative and administrative matters is essential to protect public confidence in the responsiveness and representative nature of government officials and institutions. The San Francisco Lobbyist Ordinance (San Francisco Campaign & Governmental Conduct Code [SFC&GCC] Section [Sec.] 2.100 et seq.) was established to impose reasonable registration and disclosure requirements to reveal information about lobbyists' efforts to influence decision-making regarding local legislative and administrative matters. By restricting gifts, campaign contributions, and bundled campaign contributions by lobbyists, the law is designed to increase public confidence that governmental decisions are not, and do not appear to be, influenced by the giving of personal benefits to City officers by lobbyists, or by lobbyists' financial support of City officers' political interests.

To promote lobbyists' compliance with the law, the San Francisco Ethics Commission conducted an audit of **Rudolph Reyes: SFO-153977** (hereinafter "the Lobbyist") covering the audit period January 1, 2021, through December 31, 2021. This Audit Report summarizes the results for the audit.

Authority

Under SFC&GCC Sec. 2.135(c), the Executive Director of the Commission shall initiate audits of one or more lobbyists selected at random on an annual basis and undertake any other audits or investigations of a lobbyist authorized by law or regulation.

Objectives and Scope

The objective of the audit was to reasonably determine whether the Lobbyist substantially complied with requirements of SFC&GCC Sec. 2.100 et seq. and supporting regulations.

The audit was performed based on a review of the Lobbyist’s filings and records covered by the audit period to determine, among other things:

- Compliance with disclosure and record-keeping requirements pertaining to lobbyist registration, monthly disclosure reporting, and training; and
- Compliance with applicable restrictions on lobbyist activity.

The Lobbyist was randomly selected for audit from a population of registered lobbyists who filed disclosure statements with the Ethics Commission for the period January 1, 2021, through December 31, 2021.

Nothing in this report shall be interpreted to prevent an enforcement action by the Ethics Commission or another appropriate agency for conduct in violation of the law, whether or not that conduct is covered by this report.

This report will be posted to the Commission’s website and forwarded to the Commission’s Enforcement Division for review to determine whether any further action may be warranted.

Auditee Information

Background

At all times relevant to the audit, the Lobbyist was an in-house contact lobbyist employed by Verizon Communications, Inc. and performed lobbying services on its behalf. The Lobbyist filed the lobbyist registration on March 4, 2021, and contacted public officials at the San Francisco Board of Supervisors, San Francisco City Attorney’s Office, and San Francisco Department of Technology regarding matters related to a 5G Master License Agreement between cell phone carriers and the City.

Lobbyist Reported Activity

Total Number of Contacts	23
Total Payments Promised	\$2,407.46
Total Activity Expenses	\$0.00
Total Contributions Made	\$550.00

The lobbyist activity totals were taken from disclosure statements filed with the San Francisco Ethics Commission for the period January 1, 2021, through December 31, 2021.

Audit Respondent

The Audit Respondent identified below was the primary audit contact during the audit and responded to audit inquiries and requests on behalf of the Lobbyist.

Evann Whitelam
Nielsen Merksamer Parrinello Gross & Leoni, LLP
2350 Kerner Blvd. Ste 250
San Rafael, CA 94901

Audit Findings

Under SFC&GCC Sec. 2.110(c)(1), contact lobbyists shall report to the Ethics Commission for each calendar month information regarding contact activity to influence local legislative or administrative action and economic consideration received or expected, among other things, no later than the fifteenth calendar day following the end of the month. Under SFC&GCC Sec. 2.110(c)(1)(F), contact lobbyists shall report the amount of economic consideration received or expected by the lobbyists or the lobbyists' employer from each client during the reporting period.

The following finding was noted during the audit:

Monthly Disclosure Statements

Payments promised disclosed on the San Francisco Ethics Commission Individual Lobbyist Statement filed for the March 2021 period were overstated by \$748.25. The amount disclosed was \$900. The amount that should have been disclosed, per documents reviewed by the auditor, was \$151.76.

Conclusion

Except as indicated in the **Audit Findings** section above, and in our opinion, the Lobbyist substantially complied with the requirements of SFC&GCC Sec. 2.100 et seq. and supporting regulations.

Auditee Response

The Audit Respondent stated that the hourly compensation rate used to calculate compensation for March 2021 lobbying services was a good faith estimate provided by the Lobbyist in a questionnaire response. An amendment to the March 2021 Individual Lobbyist Statement was filed November 14, 2022, reflecting \$151.76 in compensation.