



# San Francisco Ethics Commission

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## Lobbying Audit Report:

**Carl Shannon**

**Lobbyist ID: SFO-153833**

**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 **Carl Shannon: SFO-153833** (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 Tishman Speyer Properties, L.P. and performed lobbying services on behalf of Tishman Speyer. This included contacting public officials in the Planning Commission regarding planning and building permits. The Lobbyist renewed their registration for the 2021 calendar year on December 17, 2020.

#### **Lobbyist Reported Activity**

Total Number of Contacts	1
Total Payments Promised	\$700
Total Activity Expenses	\$0
Total Contributions	\$0

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. Holland & Knight LLP is a law firm retained by Tishman Speyer Properties, L.P. for regulatory and government affair matters.

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### **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**

One payment promised in the amount of \$700 was not initially disclosed on the October 2021 San Francisco Ethics Commission Individual Lobbyist Statement filed on November 15, 2021. This amount represented 100% of the total amount of payments owed to the Lobbyist by their employer during the audit period. The information was disclosed four days after the deadline on an amendment filed on November 19, 2021.

### **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**

A response to the audit finding was not provided.