

Gayathri Thaikkendiyil  
Acting Executive Director

Patrick Ford  
Director of Enforcement

San Francisco Ethics Commission  
25 Van Ness Avenue, Suite 220  
San Francisco, CA 94102  
(415) 252-3100

BEFORE THE SAN FRANCISCO  
ETHICS COMMISSION

In the Matter of	)	SFEC Complaint Nos. 2122-021/040
	)	
ALISON COLLINS FOR SCHOOL BOARD 2018 and	)	
ALISON COLLINS,	)	<b>Streamlined Administrative Resolution Program</b>
	)	<b>STIPULATION, DECISION, AND ORDER</b>
Respondents.	)	
	)	
_____	)	

THE PARTIES STIPULATE AS FOLLOWS:

1. This Streamlined Administrative Resolution Program Stipulation, Decision, and Order (Stipulation) is made and entered into by and between Alison Collins for School Board 2018 and Alison Collins (hereinafter "Respondents") and the San Francisco Ethics Commission (the Commission).

2. Respondents and the Commission agree to settle and resolve all factual and legal issues in this matter and to reach a final disposition through the Commission's Streamlined Administrative Resolution Program and without an administrative hearing. Respondents represent that Respondents have accurately furnished to the Commission all information and documents that are relevant to the conduct described in Exhibit A. Upon approval of this Stipulation and full performance of the terms outlined in this Stipulation, the Commission will take no future action against Respondents regarding the violations of law described in Exhibit A, and this Streamlined Stipulation shall constitute the complete resolution of all claims by the Commission against Respondents related to such violations. Respondents

understand and knowingly and voluntarily waive all rights to judicial review of this Streamlined Stipulation and any action taken by the Commission or its staff on this matter.

3. Respondents acknowledge responsibility for and agree to pay an administrative penalty as set forth in Exhibit A. Respondents agree that the administrative penalty set forth in Exhibit A is a reasonable administrative penalty.

4. Within ten business days of the Commission's approval of this Stipulation, Respondents shall either pay the penalty through the City's online payment portal or otherwise deliver to the following address the sum as set forth in Exhibit A in the form of a check or money order made payable to the "City and County of San Francisco":

San Francisco Ethics Commission  
Attn: Enforcement & Legal Affairs Division  
25 Van Ness Avenue, Suite 220  
San Francisco, CA 94102

5. If Respondents fail to comply with the terms of this Stipulation, then the Commission may reopen this matter and prosecute Respondents under Section C3.699-13 of the San Francisco Charter for any available relief.

6. Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural rights under Section C3.699-13 of the San Francisco Charter and the Commission's Enforcement Regulations with respect to this matter. These include, but are not limited to, the right to appear personally at any administrative hearing held in this matter, to be represented by an attorney at Respondents' expense, to confront and cross-examine all witnesses testifying at the hearing and to subpoena witnesses to testify at the hearing.

7. Respondents understand and acknowledge that this Stipulation is not binding on any other government agency with the authority to enforce the San Francisco Campaign & Governmental Conduct Code section 1.100 *et seq.*, and does not preclude the Commission or its staff from cooperating

with or assisting any other government agency in its prosecution of Respondents for any allegations set forth in Exhibit A, or any other matters related to those violations of law set forth in Exhibit A.

8. This Stipulation is subject to the Commission's approval. In the event the Commission declines to approve this Stipulation, the Stipulation shall become null and void, except Paragraph 9, which shall survive.

9. In the event the Commission rejects this Stipulation, and further administrative proceedings before the Commission are necessary, Respondents agree that the Stipulation and all references to it are inadmissible. Respondents moreover agree not to challenge, dispute, or object to the participation of any member of the Commission or its staff in any necessary administrative proceeding for reasons stemming from his or her prior consideration of this Stipulation.

10. This Stipulation, along with the attached Exhibit A, reflects the entire agreement between the parties hereto and supersedes any and all prior negotiations, understandings, and agreements with respect to the transactions contemplated herein. This Stipulation may not be amended orally. Any amendment or modification to this Stipulation must be in writing duly executed by all parties and approved by the Commission at a regular or special meeting.

11. This Stipulation shall be construed under, and interpreted in accordance with, the laws of the State of California. If any provision of the Stipulation is found to be unenforceable, the remaining provisions shall remain valid and enforceable.

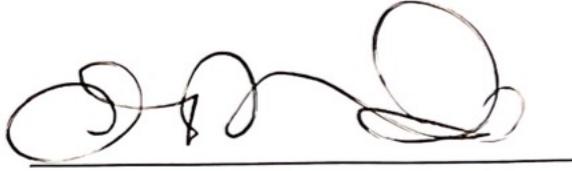
12. The parties hereto may sign different copies of this Stipulation, which will be deemed to have the same effect as though all parties had signed the same document.

Dated: 03-03-2023 | 10:28:00 PST

DocuSigned by:  
*Gayathri Thaikkenidiyl*  
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GAYATHRI THAIKKENDIYL, ACTING EXECUTIVE DIRECTOR  
SAN FRANCISCO ETHICS COMMISSION

Dated: 2/27/2023



ALISON COLLINS, INDIVIDUALLY AND ON BEHALF OF  
ALISON COLLINS FOR SCHOOL BOARD 2018

**DECISION AND ORDER**

The foregoing Stipulation of the parties in the matter of “Alison Collins for School Board 2018 and Alison Collins, SFEC Complaint No. 2122-021/040,” including the attached Exhibit A, is hereby accepted as the final Decision and Order of the San Francisco Ethics Commission, effective upon execution below by the Chairperson.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_

YVONNE LEE, CHAIRPERSON  
SAN FRANCISCO ETHICS COMMISSION

## Exhibit A

### **Background and Law**

#### **Campaign Finance**

On January 5, 2018, Alison Collins for School Board 2018 was formed to support the candidacy of Respondent to the Board of Education in the November 6, 2018, election. In total, the committee has reported that it received approximately \$43,118 in contributions and made \$43,618 in expenditures.

If the cumulative amount of contributions received from a contributor is \$100 or more, the committee cannot deposit any contribution that causes the total amount contributed by a person to equal or exceed \$100 unless the committee has the contributor's employer and occupation information, or the name of the contributor's business if the contributor is self-employed. SF C&GCC § 1.114.5(a).

On its Campaign Statements for periods January 1, 2017, through December 31, 2018, the Committee reported that it received approximately \$3,950 in contributions from 13 contributors who contributed \$100 or more and for whom the Committee listed "self" as the contributors' employer.

#### **Form 700**

Respondent served as a School Board Member from January 8, 2019, until she left office on March 11, 2022. SF C&GCC section 3.1-420 requires members of the School Board to file a Form 700 Statement of Economic Interests. Such officials must file within 30 days of assuming or leaving office and must also file annually by April 1st to report financial interests during the previous calendar year. SF C&GCC section 3.1-102(a); 2 CCR 18730.

Respondent did not file a Form 700 covering calendar year 2021 and nor a Leaving Office Form 700.

**Description of Violation:** This enforcement matter consists of two counts in violation of campaign finance and financial disclosure reporting requirements respectively.

**Count 1:** On its Campaign Statements for periods January 1, 2017, through December 31, 2018, Respondent for School Board 2018 reported that it received approximately \$3,950 in contributions from 13 contributors who contributed \$100 or more and for whom the committee listed "self" as the contributors' employer without reporting the name of the contributor's business before it deposited the contributions. This constitutes a violation of the contributor information requirements in SF C&GCC section 1.114.5(a).

**Count 2:** Respondent failed to comply with the Annual Form 700 requirement for calendar year 2021 and the Leaving Office Form 700 requirement in violation of SF C&GCC section 3.1-102(a) and 2 CCR 18730.

#### **SARP Eligibility Requirements:**

**Count 1:** For contributions that lack complete contributor information, SARP requires that the respondent amend the relevant campaign statements to disclose the required information. In response to contact by the Commission's Enforcement Division, in December 2021 Respondent amended her committee's campaign statements for the relevant periods to report the name of the contributors' businesses for the 13 contributors, as required.

Investigators found no evidence that any of these persons or their business entities had contracts with the School District. Investigators also found no evidence that the contributor information was willfully omitted by the committee to obscure the source of the contributions nor that these contributions were prohibited.

**Count 2:** For failure to file the Form 700, SARP requires that the respondent file the outstanding statements and report the required information. In response to contact by the Commission's Enforcement Division, in August 2022 Respondent filed a combined Form 700 for the 2021 calendar year and Leaving Office Form 700 for the period in 2022 that she served as a School Board Member.

Investigators found no evidence that any of the interests that Respondent disclosed on her late Form 700 filing had business before the School Board, nor did Investigators find evidence that the failure to file was willful.

**Specific Financial Penalty Modifiers:** SARP sets forth the fixed penalties that apply to SARP-eligible violations. The fixed penalties are based on the number of violations and the amount of time it takes for the respondent to settle the matter after being contacted by the Enforcement Division, including any necessary remedial actions.

**Count 1:** The penalty that applies to the campaign finance violation at issue is \$895. This represents \$500 plus 10% of all contributions received without complete contributor information when the respondent amends any of the relevant campaign statements to disclose the missing information within 30 days and the stipulation was timely signed and returned. The respondent took remedial action within 30 days of contact by the Enforcement Division and timely signed and returned this stipulation.

**Count 2:** The penalty that applies to the financial disclosure violation at issue is \$500. This penalty amount is applied when the respondent filed an outstanding financial disclosure statement within 30 days and the stipulation was timely signed and returned. The respondent took remedial action within 30 days of contact by the Enforcement Division and timely signed and returned this stipulation.

After application of the SARP penalty for each count, the total proposed penalty for Counts 1 and 2 is \$1,395.