



City & County of San Francisco Ethics Commission



Campaign Finance Update & Informational Session

Contents



Building Blocks

Legal Sources
Foundational Terms



Committee Obligations

Committee Formation - General
Committee Formation - MPOs
Obligations – General
Obligations – Filing Jurisdiction



Restrictions

Contribution Limit & Prohibitions
Circumvention – Coordination
Circumvention – Assumed Name
Contributions

Building Blocks

Legal Sources

- SF Campaign & Governmental Conduct Code
- Political Reform Act
- Ethics Commission Regulations & Fair Political Practices Commission Regulations

Foundational Terms

- Candidates & Committees
- Contributions & Expenditures



Committee Formation - General

Formation

- **Recipient Committee**
- **Independent Expenditure Committee**
- **Major Donor Committee**

Organization

Filing & Campaign Reporting: What, When, Where



Committee Formation - MPO



Multi-Purpose Organization

- Trade association
- Non-profit
- Civic, religious, educational institutions

Committee

- Solicits or receives payments
- Accepts payments subject to condition, agreement, or understanding

Stipulated Settlement: SFBC

- Political activity
- Fundraising activity
- Reporting

Obligations - General

Filing

- Semi-Annual Statements
 - Contributions
 - Expenditures
 - Payments, Loans, Other
- Pre-Election Statements
- Late Contributions & Expenditures
- What, When, Where

Disclaimers



Obligations – Filing JURISDICTION (Where)



Campaign Filing Jurisdiction

- State vs. Local jurisdiction
- 70% of contributions or expenditures
- Verification and switching

70% Test

- 24-month Test
- Current Period Test
- Purpose

Stipulated Settlement: Progress SF

- Resignation
- Harm

Contribution Limit & Prohibitions - General

Contribution Limit

Prohibitions

- **Contractors**
- **Land Use**
- **Corporations**

Purpose

Circumvention



Circumvention - Coordination



Coordination

- General coordination
- Rebuttable Presumption
- Legal consequences



FPPC Case: Furey

- Coordination by third party



Circumvention – Assumed Name



Assumed Name Contributions

- General prohibitions
- Purpose
- Warning signs

LA Ethics Case: Hillcrest Road

- Use of employees
 - Charges
 - Penalties





Thank You