



# San Francisco Ethics Commission

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**Date:** July 7, 2025

**To:** Members of the Ethics Commission

**From:** Olabisi Matthews, Director of Enforcement  
Bertha Cheung, Snr. Investigator and Legal Analyst

**Re:** **Agenda Item 5: Discussion and Possible Action regarding Hearing on the Merits *In the Matter of William Walker*, Case No. 2223-507**

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## Summary

This memorandum provides information regarding the Hearing on the Merits *In the Matter of William Walker*, Case No. 2223-507.

## Background

In February 2023, San Francisco Ethics Commission ("Commission") Investigators initiated communications with Respondent, William Walker, regarding his failure to comply with campaign finance laws in connection with his November 2022 campaign for the Community College Board of Trustees. After several months of attempting to obtain Respondent's compliance with document disclosures and required filings, on October 19, 2023, Investigators served Respondent with a duly authorized subpoena for records related to the Commission's investigation. Despite continued efforts by Investigators to secure compliance, including follow-up communications through at least August 2024, Respondent failed to fully comply.

Pursuant to Section 7(B) of the Commission's Enforcement Regulations Section 7(B), on December 5, 2024, the Commission's Director of Enforcement issued a Probable Cause Report against Respondent, identifying six counts of violations of the San Francisco Campaign and Governmental Conduct Code ("C&GC Code") and the California Government Code ("Cal. Gov't Code"), as follows:

COUNT 1: Respondent violated Cal. Govt Code section 84101 and C&GC Code section 1.112 when he failed to file a Statement of Organization to form a political committee.

COUNT 2: Respondent violated Cal. Govt Code sections 84200 and 84200.5 and C&GC Code sections 1.112 and 1.135 when he failed to file required semi-annual and pre-election campaign statements.



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COUNT 3: Respondent violated C&GC Code section 1.107 when he failed to complete the required training as a candidate for public office in the City and County of San Francisco.

COUNT 4: Respondent violated C&GC Code section 1.114.5 when he failed to collect the required information for contributors who gave at least \$100 to his campaign.

COUNT 5: Respondent violated C&GC Code section 1.108 and Cal. Gov't Code section 85201 when he failed to establish a campaign contribution trust account.

COUNT 6: Respondent violated C&GC Code section 1.170(f) when he failed to furnish documents and information to the Commission as required by law.

On January 13, 2025, the Executive Director convened a Probable Cause Conference with Respondent and the Enforcement Division pursuant to Enforcement Regulation 7(C). Subsequently, on March 5, 2025, the Commission ratified the Executive Director's Probable Cause Determination as to all six counts. Upon ratification, the matter became eligible to proceed to an administrative hearing.

On April 11, 2025, the Enforcement Division appeared before the Commission to address certain procedural matters that required resolution before the commencement of the administrative hearing. On May 29, 2025, both parties confirmed that they did not intend to submit any pre-hearing motions. Accordingly, on June 3, 2025, the Executive Director issued formal notice of the hearing on the merits, setting the hearing for July 11, 2025.

On June 11, 2025, the Enforcement Division submitted its Hearing Brief and accompanying materials to the Respondent and all Commissioners. Respondent did not submit a Response Brief or provide a witness list or list of exhibits. As a result, under the Enforcement Regulations, the Enforcement Division is not obligated to submit a rebuttal brief.

Pursuant to the Commission's decision at its April 11, 2025 meeting, the Commission will preside over the hearing as a full body. The Commission also adopted the Enforcement Division's recommendation that the Director of Enforcement submit a proposed Order for consideration by the presiding Commissioners. The Commission may deliberate on the proposed Order, make amendments based on its findings on each count, and adopt a final Order with the affirmative vote of at least three Commissioners.



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### Action Requested

The hearing on the merits will proceed in accordance with the applicable provisions of the Charter of the City and County of San Francisco, the C&GC Code, the Enforcement Regulations, and the California Administrative Procedure Act. These procedural requirements are also summarized in the Commission's [Enforcement Hearing Guidebook](#) and [Stage Three of the Checklist](#). The Enforcement Division requests that at the end of this hearing, the Commission find Respondent in violation of all the counts as alleged and impose the recommended penalty amount of \$3,000, comprising \$500 for each of the six distinct violations of law committed by Respondent. The Enforcement Division also requests that this Commission issue an Order directing Respondent to file all required campaign finance disclosures and come into full compliance with the state and local laws within 30 days of the conclusion of this hearing.