



San Francisco Ethics Commission

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Campaign Finance Audit Report Adlah Chisti for Supervisor 2024 (ID # 1466510)

July 30, 2025

I. Introduction

This Audit Report summarizes the audit results for the committee Adlah Chisti for Supervisor 2024, FPPC ID # 1466510 (the "Committee"), for the period January 1, 2024, through December 31, 2024. The audit was conducted by Ethics Commission audit staff to determine whether the Committee materially complied with applicable state and local campaign finance laws during the November 2024 election.

II. Audit Authority

San Francisco Charter Section C3.699-11 authorizes the Ethics Commission (the "Commission") to "audit campaign statements and other relevant documents" of campaign committees that file with the Commission. San Francisco Campaign and Governmental Conduct Code ("C&GCC") Section 1.150(a) requires the Commission to audit all committees of candidates who have received public financing and authorizes the Commission to initiate targeted audits of other committees at its discretion.

III. Objective and Scope

The objective of the audit was to reasonably determine whether the Committee materially complied with requirements of the San Francisco Campaign Finance Reform Ordinance (C&GCC Section 1.100, et seq., and supporting regulations) and the California Political Reform Act (California Government Code Section 81000, et seq., and supporting regulations).

The audit was conducted based on an analysis of the Committee's filings and support documentation obtained from the Committee. A complete summary of the audit's objectives and the methods used to address those objectives appears in Appendix A.

IV. Committee Information

The Committee qualified as a committee on February 24, 2024, as a candidate-controlled committee supporting the election of Adlah Chisti to the office of District 11 Supervisor in the November 5, 2024, election. The Committee terminated on April 30, 2025, per a Form 410 Statement of Organization filed on July 16, 2025.

During the audit period, the Committee had three treasurers. The Committee listed candidate Adlah Chisti as the initial treasurer from January to May 2024. The Committee then listed Julie Wedge of Wedge Consulting as treasurer from May to October 2024, though Ms. Wedge confirmed to Auditors that she terminated her contract with the Committee on August 2, 2024. Max Coston of SP Strategies

became treasurer (the “Treasurer”) in October 2024 and remained treasurer for the duration of the audit. Max Coston was the primary audit contact on behalf of the Committee during the audit.

After providing additional support records on June 13, 2025, in response to an initial draft of this report, the Treasurer did not respond to any Auditor communication between June 13, 2025, and the publication of this report. Auditors emailed the Treasurer to provide opportunities to comment on revised versions of the report on June 23, June 30, and July 18. Auditors received no response by the communicated deadlines. On June 30, Auditors discovered via an automated response from Coston’s SP Strategies email address that Coston was no longer using that contact information and had transitioned to a new address associated with Sunrise Political Solutions.

For the period covered by the audit, the Committee reported receiving \$108,916 in contributions, including \$29,190 in monetary contributions and \$79,726 in public financing—and making or incurring \$106,020 in expenditures.

In April 2025, the Committee filed amendments to its previously filed Form 460 reports modifying multiple expenditures. Between the beginning of the audit in January 2025 and the April 2025 amendments, total reported expenditures increased by about \$6,522, from \$99,468 to \$106,020. These amendments also made multiple changes to expenditure amounts, dates, and descriptions.

V. Material Audit Findings

Auditors identified the following material findings during the audit. These findings represent instances of noncompliance that Auditors determined to be significant based on the frequency of occurrence within a representative sample or based on the significance of the dollar amount, the percentage of total activity, or the importance of the item to the purposes of state or local law.

Finding V-1. The Committee did not maintain required contributor records for reported contributions

Applicable Law

For each contribution received of \$25 or more, committees must maintain records containing the date and amount of the contribution and the full name and street address of the contributor, and original source documentation including copies of contributor checks, any other record of all items deposited, and contributor cards. 2 CCR § 18401(a)(2)(A)-(B). For each contribution received of \$100 or more, committees must additionally maintain records of the contributor’s occupation and employer and any communication used to secure that information. *Id.* § 18401(a)(3)(A)-(B).

Analysis

Auditors reviewed a sample of 42 contributions totaling \$10,003 and identified nine transactions (21% of the sample) totaling \$2,377 (24% of the sampled amount), for which the Committee did not maintain required support records, thereby preventing verification of the reported contribution activity. These transactions are described below grouped by the specific nature of the missing documentation.

Three contributions were not supported by any manner of documentation required by Regulation 18401(a)(2)(A). The Committee did not provide check copies, contributor cards, or alternative records

for these transactions. As a result, Auditors were unable to verify the identity of the contributor or the date or amount of the reported contribution. The following table summarizes the contributions for which no documentation was provided:

Contributor	Reported Date	Amount
Azam Khan	3/5/2024	\$250
Ismail Mohammed	12/7/2024	\$250
Ortikov Avazbek	12/8/2024	\$250

Two additional contributions, recorded in the Committee's internal register as cash contributions, were not supported by any documentation, such as contributor cards. Although these contributions were under \$100 and therefore were not required to be disclosed under Government Code Section 84211(f), these contributions were still subject to recordkeeping requirements under Regulation 18401(a)(2) because they were greater than \$25. The following table summarizes the non-reportable contributions for which no documentation was provided:

Contributor Name	Date	Amount
Farooq Khan	4/10/2024	\$99
Suleman Bhasha	4/15/2024	\$99

Auditors also identified three contributions totaling \$1,250 for which contributor cards were not maintained. While Auditors were able to confirm the amounts of the contributions, the absence of contributor cards or similar attestations prevented Auditors from verifying the reported occupations and employers. The following table summarizes the contributions for which contributor cards were not provided:

Contributor	Reported Date	Amount
Sabir Chisti	2/22/2024	\$500
Amron Chisti	2/23/2024	\$500
Michael S Tong	4/10/2024	\$250

Auditors also reviewed five entries disclosed on Schedule I (Miscellaneous Increases to Cash) of the Committee's filed Form 460 campaign statements. The Committee initially did not provide documentation for three public financing deposits totaling \$79,476. Internal records for a \$9,960 deposit included a note stating the check could not be located. After reviewing a draft of this report, the Committee located and provided documentation for all public financing deposits, resolving those deficiencies. However, the Committee also reported a \$179 refund from Nationbuilder, summarized in the table below, for which it did not provide any record to substantiate the reported refund.

Refunding Vendor	Reported Date	Amount
Nationbuilder	04/12/2024	\$179

Finding V-2. The Committee did not maintain any support documentation for certain expendituresApplicable Law

For each expenditure made of \$25 or more, or a series of payments for a single product or service totaling \$25 or more, committees must maintain records containing the date and amount of the expenditure, the full name and street address of the payee, and a description of the goods or services received, as well as original source documentation including cancelled checks, wire transfers, credit card charge slips, bills, receipts, invoices, statements, or vouchers. 2 CCR § 18401(a)(4)(A)-(B).

Analysis

The Committee did not maintain required support documentation for several reported expenditures. Auditors reviewed a sample of 73 expenditure transactions totaling \$64,874 and identified seven transactions (9.6% of the sample) totaling \$2,542 for which the Committee did not provide any invoices, contracts, receipts, or other documentation. The absence of these records prevented Auditors from verifying the reported payee information, the amount, and the campaign-related purpose of each expenditure. The Treasurer and Candidate confirmed that they had provided all expenditure records in their possession. The following table summarizes the expenditures for which no support documentation was provided:

Vendor Name	Date	Amount
NationBuilder	2/12/2024	\$280
Alice B. Toklas LGBTQ Democratic Club PAC	6/5/2024	\$150
United Democratic Club of San Francisco	7/15/2024	\$250
Basset Luquian	9/1/2024	\$362
San Francisco Muslim Community Center	10/7/2024	\$500
San Francisco Green Party	10/8/2024	\$500
Harvey Milk LGBT Democratic Club Political Fund	10/19/2024	\$500

VI. Other Identified Findings

Auditors identified the following non-material findings during the audit. These findings represent instances of noncompliance discovered through review of the Committee's filings and support documentation and through testing of sampled transactions that were determined not to be material in terms of frequency or dollar amount. This information is reported for the awareness of committees and treasurers and to facilitate the tracking of trends across audit reports.

Finding VI-1. The Committee maintained inconsistent or incomplete expenditure recordsApplicable Law

For each expenditure made of \$25 or more, or a series of payments for a single product or service totaling \$25 or more, committees must maintain records containing the date and amount of the expenditure, the full name and street address of the payee, and a description of the goods or services

received, as well as original source documentation including cancelled checks, wire transfers, credit card charge slips, bills, receipts, invoices, statements, or vouchers. 2 CCR § 18401(a)(4)(A)-(B).

For each person to whom a committee has made an expenditure of \$100 or more, the committee must disclose the full name and street address of the payee, the date and amount of each expenditure, and a brief description of the consideration received. Gov't Code § 84211(k).

Analysis

From the sample of 73 expenditure transactions noted above, Auditors identified four transactions totaling \$3,000 for which support documentation maintained by the Committee contained incomplete or inconsistent information. Each of the expenditures discussed in this finding were coded as “campaign consultant” in the Committee’s Form 460 campaign statement.

For a \$1,000 payment to Claire Farrell, the Committee provided only an IRS Form 1099-NEC showing total annual compensation of \$1,500 paid to the individual. The Committee did not provide an invoice or other documentation describing the services provided, the dates of service, or the reason for the discrepancy between the amount reported on the Form 460 and the amount in the 1099-NEC. Similarly, for a \$500 payment to Jeremy Cursi and a \$500 payment to Hope Gatwood, the Committee initially provided only IRS Form 1099-NECs that lacked the required expenditure information. The Committee later provided IRS Form W-9s for each individual, which also lacked dates or descriptions of services. Without invoices or similar records, Auditors were unable to determine the specific services covered by the payments and whether the payments had been reported in the correct period.

Finally, the Committee reported a \$1,000 payment to PTGR Strategies for consulting services dated August 22, 2024. This expense was supported only by a screenshot of a QuickBooks “payment receipt” which did not include a description of the goods or services. The Committee did not provide any documentation describing the services rendered, preventing Auditors from verifying the purpose of the expenditure or whether any portion should have been reported as an expenditure to a subvendor.

The table below summarizes the transactions discussed in this finding:

Vendor Name	Date	Amount (\$)
PTGR Strategies	8/22/2024	\$1,000
Claire Farrell	9/23/2024	\$1,000
Jeremy Cursi	9/27/2024	\$500
Hope Gatwood	10/19/2024	\$500

VII. Conclusion

Except as noted in the audit findings sections above, and based on the evidence obtained, Auditors conclude that the Committee substantially complied with the requirements of the California Political Reform Act and the San Francisco Campaign and Governmental Conduct Code. The Committee was provided a copy of this report and an opportunity to respond. However, the Committee did not provide a response to the report.

This report and the support documentation on which it is based will be forwarded to the Commission's Enforcement Division for further investigation and/or enforcement action as warranted. The scope of the audit is not exhaustive of all conduct of the Committee during the audit period, and any subsequent enforcement action may include conduct not covered in this report.

This Audit Report is intended to provide information about the Committee's activities and its compliance with campaign finance requirements to the Commission, the Committee and its Treasurer, and San Francisco voters. This report, and all Audit Reports prepared by the Commission, will be posted to the Commission's website at **sfethics.org**.

Appendix A

Objectives and Methodology

Audit Objective	Methodology
Determine whether disclosed campaign finance activity materially agrees with activity in the Committee's bank account.	<ul style="list-style-type: none"> • Calculated total reported contributions and expenditures in the Committee's filings and total reported credits and debits in the Committee's bank statements. • Applied adjustments as needed to account for variations in transaction reporting between sources.
Determine whether the Committee accepted contributions from allowable sources and in accordance with limits, appropriately disclosed those contributions, and maintained required contribution records.	<ul style="list-style-type: none"> • Reviewed contributions submitted for public funds matching for compliance with limits and accuracy of contributor information. • Selected a statistically significant sample at a 95% confidence level and a 3.5% margin of error based on the total number of reported contribution transactions. Selected samples for testing from a range of periods, sources, and payment methods. • Reviewed each sampled transaction for compliance with state and local requirements regarding contribution restrictions, disclosure, and recordkeeping. • Performed additional targeted testing of contributions identified through analysis of filing data and support records. • Utilized automated procedures to analyze data extracted from the Committee's filings. Identified contributions from prohibited sources and late-reported transactions. Verified identified noncompliance against support records.
Determine whether the Committee made expenditures for allowable purposes, appropriately disclosed those expenditures, and maintained required expenditure records.	<ul style="list-style-type: none"> • Selected a statistically significant sample at a 95% confidence level and a 3.5% margin of error based on the total number of reported expenditure transactions. Selected samples for testing from a range of periods, sources, amounts, vendors, and agents. • Reviewed each sampled transaction for compliance with state and local requirements regarding expenditure restrictions, disclosure, and recordkeeping, including any expenditures made to subvendors by agents or contractors of the committee. • Performed additional targeted testing of expenditures identified through analysis of filing data and support records. • Utilized automated procedures to analyze data extracted from the Committee's filings. Identified late-reported transactions and verified identified noncompliance against support records.
Identify any other evidence of potential noncompliance for inclusion in the audit report or referral for further investigation.	<ul style="list-style-type: none"> • Analyzed data extracted from the Committee's filings. • Analyzed support records obtained from the Committee.