



San Francisco Ethics Commission

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September 5, 2025

To: Members of the Ethics Commission
From: Olabisi Matthews, Director of Enforcement
Subject: **Agenda Item 6: Quarterly Enforcement Report**

Summary and Action Requested

This report provides general programmatic updates and data about the cases handled by the Commission's Enforcement Division.

No action is required by the Commission, as this item is for informational purposes only.

Matters Resolved

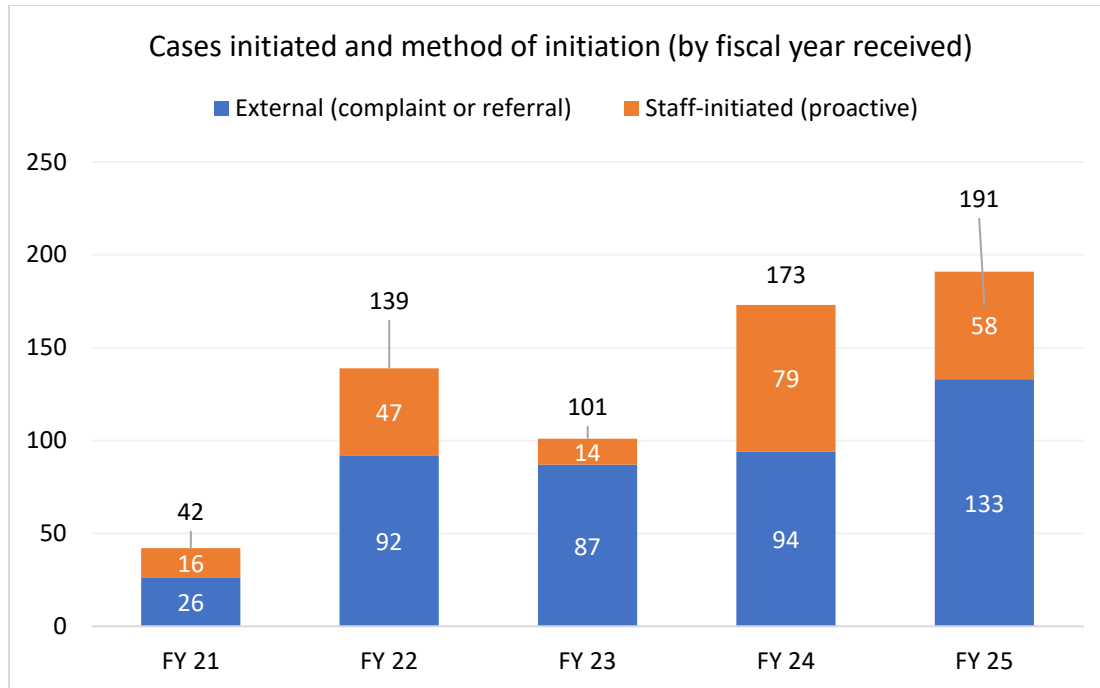
Fiscal Year 2021 - Fiscal Year 2025

Over the past five fiscal years, the number of enforcement matters initiated by the Commission has grown significantly, reflecting both increased public engagement and the Division's strengthened proactive capacity. In FY21, 42 matters were initiated, with 26 arising from external complaints and 16 through proactive investigations. Those figures rose to 92 and 47, respectively, in FY22, and to 87 and 14 in FY23. In FY24, the Division saw a substantial increase in proactive case work, initiating 94 matters from public complaints and 79 from proactive reviews. This improvement was made possible through targeted initiatives to build staff capacity and leverage new investigative tools.

In FY25, the Division initiated 191 matters, which represents the highest in recent years. This volume was driven primarily by complaints received from members of the public (133), alongside 58 proactive investigations initiated by staff based on information obtained from public disclosure filings, audits, and media reports. While proactive case numbers were lower compared to FY24, the marked increase in public complaints demonstrates heightened reliance on the Commission's enforcement processes and underscores the importance of maintaining responsive and efficient investigative capacity. Notably, the Division achieved these results while operating understaffed for much of the fiscal year due to internal promotions. With the onboarding of new staff, the Division is now fully staffed and positioned to sustain its enforcement work. The case totals by fiscal year are broken down in Figure 1 below:



Figure 1.



Fiscal Year 2026

Matters Concluded

So far in Fiscal Year 2026 (July 1, 2025 – September 4, 2025), the Enforcement Division has concluded a total of 15 enforcement matters. One of those matters was closed at the Hearing on the Merits stage, following a [Default Order](#) issued against Respondent *In the Matter of William Walker*. 12 of the matters were dismissed after preliminary review, another was closed with a warning letter, while the remaining one was closed after investigation.

Cases In Progress

So far in FY26, 38 enforcement matters have been initiated. 16 of these cases were initiated through complaints that the Commission received from the public. 21 matters were initiated by the Division based on observations in public disclosures, independent research, and interactions with regulated persons. One matter was initiated based on a referral from the Controller's Whistleblower Program. Four of the 38 matters initiated in FY26 (and included in the count above) were dismissed for various reasons, including because they did not allege violations within the Commission's jurisdiction, while the others remain in progress.

In total, 54 matters are currently in progress, including matters that were initiated during FY25 and one matter that was initiated in FY24. The matter that was initiated in FY24 (*In the Matter of Charlie Chiem*)



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has resulted in a [Probable Cause Determination](#) and will be presented before the Commission for prehearing matters and a full hearing on the merits at a future meeting. Of these matters, 28 are in preliminary review, and 26 are open investigations. These numbers are broken down in figures 2-4 below:

Figure 2. Total Number of Matters Under Review

Case Phase	SEI Non-Filer	Ethics	Campaign Finance	Retaliation	Lobbyist	Not In Jurisdiction	Total
Preliminary Review	20	3	1	3	0	1	28
Open Investigation	2	14	6	2	2	0	26
Total	22	17	7	5	2	1	54

Figure 3 – Matters in Preliminary Review by Program Area: 28

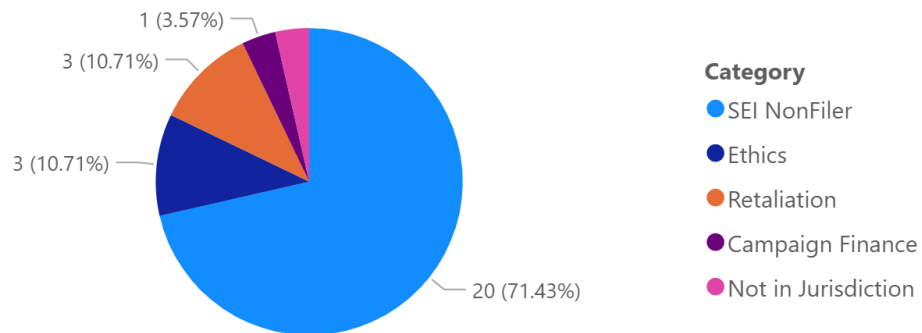
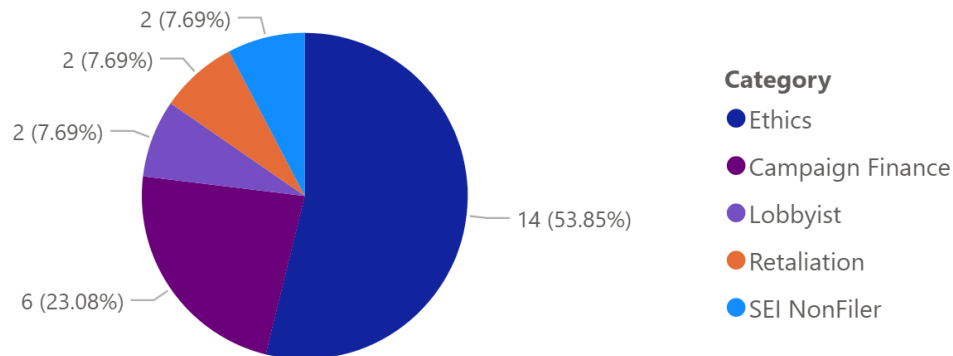




Figure 4 – Open Investigations by Program Area: 26



FY25 Initiatives

During FY25, the Division focused on several measures aimed at strengthening enforcement capacity, improving efficiency, and preparing for heightened activity during the election cycle. Some of these efforts focused on the following areas:

- **Expedited Investigation of Campaign Finance Matters**
The Division implemented measures to accelerate the review and resolution of campaign finance cases during the election year, ensuring timely enforcement action when necessary.
- **Reform of Enforcement Regulations and SARP**
Progress was made toward updating the Commission’s Enforcement Regulations and reviewing the Streamlined Administrative Resolution Program (SARP) to ensure both are aligned with best practices and support efficient case resolution.
- **Increased Use of Automation and Data Tools**
The Division identified opportunities to integrate automation into its investigative processes. These tools are expected to support more proactive casework and allow staff to identify patterns and potential violations with greater efficiency.

A full summary of these initiatives and goals achieved will be made available in the Annual Report.

FY26 Initiatives

- **Revision of the Commission’s Enforcement Regulations**
One of the primary goals of the Division is to complete its comprehensive review of the Enforcement Regulations. The Division is working to update the Commission’s Enforcement



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Regulations to strengthen accountability, improve transparency, and ensure a more efficient and fairer enforcement process. The proposed updates aim to better align the Enforcement procedures with the Commission's mandate to uphold public trust and promote integrity in City government. Over the past fiscal year, the Division has conducted best practice research across peer Enforcement Agencies, consulted with the City Attorney's Office, and engaged interested persons to seek their input and incorporate relevant feedback. The Division has also presented its recommendations before the Commission at the last two meetings and received valuable feedback which Staff has incorporated into the revisions as necessary. The updated recommendations are not presented at this meeting in order to accommodate a recent meet-and-confer request by the Municipal Executives Association ("MEA"). The Division anticipates presenting the revised recommendations to the Commission for consideration at the October meeting.

- **Review of the Commission's Streamlined Administrative Review Program**

The Division is also conducting an overview of the SARP to enhance enforcement effectiveness with better defined penalty matrices. The proposed revisions aim to add a few more types of violations that would more appropriately be handled through the streamlined program and to implement a more balanced penalty framework that allows for additional flexibility and discretion in calculating penalties, ultimately resulting in a more efficient resolution process. Much of the same progress has been made in the Divisions efforts to advance this review, including meeting with interested parties and engaging other jurisdictions. The Division plans to present its initial recommendations for the Commission's review by the end of the year.

- **Prioritize High-Impact Investigations**

The Division will continue its proactive efforts to focus on enforcement matters that significantly deter misconduct and bolster public trust, including coordinated campaign finance abuses, conflicts-of-interests and other serious ethics violations. The Division will continue to review our case prioritization framework to better weigh factors such as public harm, positions of authority, systemic risks, and legal clarity as it works to implement this approach. To free up resources for such high-impact matters, the Division will consider expanding the issuance of warning letters for low-impact, low-harm cases, including matters that require minimal investigative efforts or resources and involve cooperative respondents.

- **Establish Clearer Protocols for All Post-Filing Deadline Review**

For this fiscal year, the Division is taking steps to improve its workflow and processes for reviewing non-filer data and identifying potential respondents for enforcement action following the annual filing deadline. Part of this effort includes refining the Division's coordination efforts with the Engagement and Compliance Division to streamline the Commission's processes and to improve the accuracy of filer status and non-compliance identification, establishing defined review timelines following filing deadlines, and implementing a new process for issuing pre-



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enforcement action notices to non-compliant filers. This pre-enforcement action notice approach was recently first applied following the April 1, 2025 filing deadline and was designed to offer filers an additional opportunity to come into compliance before a full investigation is initiated. The goal is to encourage voluntary compliance while preserving enforcement resources for more serious or persistent violations.

The Enforcement Division remains committed to advancing the Commission's mission by promoting accountability, transparency, and integrity in City government. As reflected in this report, the Division has made significant strides in strengthening its enforcement practices, improving regulatory frameworks, and enhancing its capacity to proactively and efficiently address potential violations. While challenges such as staffing transitions and increased caseloads have tested the Division's resilience, the team has continued to deliver meaningful results and improve operational effectiveness. With a renewed focus on high-impact investigations, strategic reforms underway, and full staffing now in place, the Division is well-positioned to meet the evolving demands of enforcement in the year ahead and to continue building public trust through fair and consistent application of the law.