

# San Francisco Ethics Commission 2023-2024 Annual Report

## Message from the Executive Director

Thank you for taking the time to review the Ethics Commission's Annual Report for the Fiscal Year 2025. Our agency underwent significant change while achieving major milestones this year.

San Francisco saw one of its busiest election seasons in decades last November, with voters electing six seats on the Board of Supervisors, the Mayor, Sheriff, District Attorney, City Attorney, and Treasurer. Staff were busy rolling out improved campaign finance dashboards, conducting instructor-led trainings for candidates and committees, and administering the City's public financing program. All of this work aims to facilitate integrity and transparency in elections by giving candidates the tools to run clean, competitive campaigns and by giving San Franciscans the information they need for informed voting.

The fiscal year also saw an increase in proactive enforcement work and a revamped audit program. During election season, staff worked to investigate and resolve serious complaints of campaign finance violations before election day, including the Commission's largest ever settlement agreement. And in the months following the campaign, staff adopted a new set of audit protocols that allowed the Commission to publish nine audit reports in FY25, with progress on track to complete all mandatory audits by the end of calendar year 2025. This work enhances accountability in City and County elections by increasing both real-time and post-election compliance – both of which are essential to restoring public confidence in government.

Lastly, the Commission worked tirelessly in FY25 to recruit talented, civic-minded staff across all program areas. By recruiting and retaining experienced staff, refining operational protocols, and promoting cross-divisional opportunities, the Commission has been able to strengthen the foundation of its programmatic work.

In the coming year, we look forward to building upon this progress and providing San Franciscans with transparency and accountability in local government.

Sincerely,  
**Patrick Ford**  
Executive Director



# Mandate & Mission

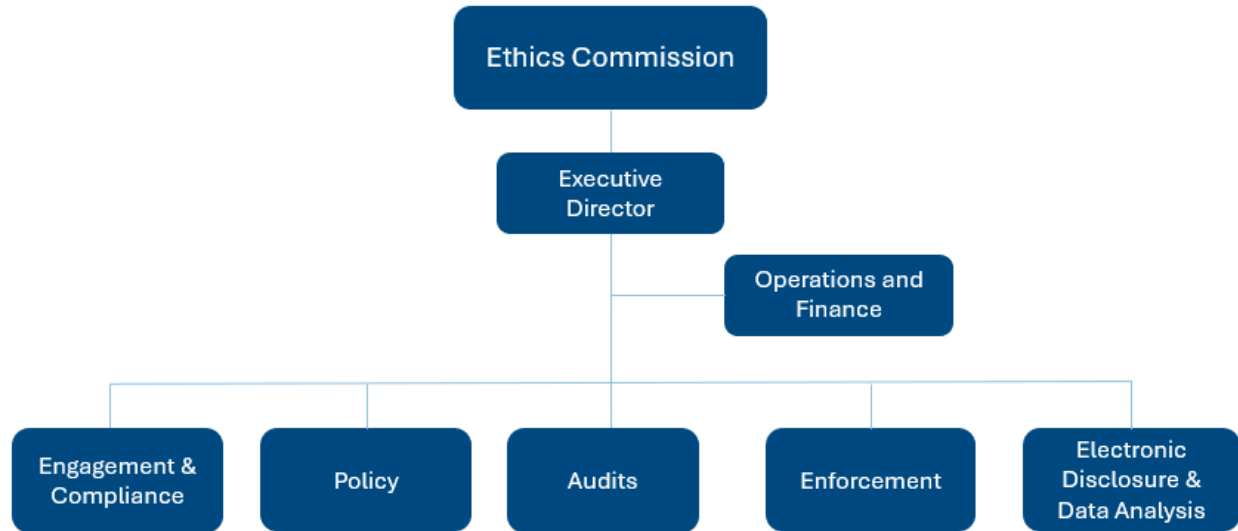
## What We Do

The Ethics Commission provides information, guidance, and training to city officers and employees, candidates for public office, lobbyists, and others to help them understand and comply with their responsibilities under the law. To fulfill its oversight mandate, the Commission is charged with ensuring fair, thorough, and timely investigations into possible violations of the City's good government laws, including laws governing campaign finance and governmental conflicts of interest, and, where appropriate, pursuing enforcement actions that serve as an effective deterrent and promote accountability in government. It also conducts audits of campaign committees and lobbyists to determine whether they have materially complied with applicable requirements of State and local laws. The Commission is also responsible for raising public awareness of relevant laws, analyzing how well current laws are achieving their intended purposes, and formulating new regulatory and legislative approaches to ensure the City's political reform laws are strong, workable, and enforceable. The Commission also administers a public campaign financing program which provides limited public financing for candidates for Mayor and the Board of Supervisors who meet established eligibility criteria.

With a sworn responsibility to the public trust, members of the Ethics Commission are pledged to a high standard of excellence in government accountability. Together with staff, the Commission works to effectively implement the laws and programs within its jurisdiction.

## Organizational Structure

The Ethics Commission has five Commissioners, each of which is appointed by one of the Mayor, the City Attorney, the District Attorney, the Assessor-Recorder, and the Board of Supervisors. The Commission elects its Chair and Vice-Chair annually. The Commission appoints an Executive Director, who in turn hires staff to assist in the day-to-day operations of the Ethics Commission.



## Progress on FY25 Goals

Each fiscal year, the Commission undertakes projects that will advance its mission and better achieve its mandates. This section summarizes the progress on those goals. Each project summarized here is explored in further detail later in this report.

### **Goal #1: Program Analysis and Revitalization**

The Commission is committed to ensuring that the laws and programs it administers are effective and workable in practice. To achieve this, the Commission monitors trends, engages with stakeholders and the regulated community, and evaluates its laws and programs to assess their effectiveness.

In FY25, the Commission launched a review of the Commission's campaign consultant rules, supplemental recusal notification requirement, major developer disclosures, campaign contribution limits, trustee election filing requirements, and public financing expenditure ceilings in January 2025. Staff held two interested person meetings and presented recommendations to the Commission in June. Staff are on track to finish this project early in FY26.

The Commission also launched a review and revision of its Enforcement Regulations to better support timely and effective enforcement actions. Staff held four interested person meetings and presented recommendations to the Commission in June 2025. Staff are on track to finish this project early in FY26.

### **Goal #2: Conducting Thorough and Timely Audits**

One of the Commission's core functions is to conduct timely and thorough audits of political committees to ensure that committees are complying with the law and that the public has current and accurate information about election-related spending.

In FY25, the Commission embarked on a full restructuring and revitalization of its audits program. The Commission recruited a new Audits Manager and three new Auditors in late 2024 and early 2025. Staff subsequently developed new protocols in early 2025 that integrated new technological tools and best practices established in government auditing standards. Following these new protocols, the Commission has made significant progress toward the goal of completing all mandatory audits from the 2024 election by the end of January 2026 and are on track to meet this goal. Staff have published nine audit reports and completed considerable progress on an additional 12 audits.

“The Commission has made significant progress toward the goal of completing all mandatory audits from the 2024 election by the end of January 2026 and are on track to meet this goal.”

### **Goal #3: Enhancing Public-Facing Information**

The Commission is tasked with ensuring that the public, regulated community, press, and other stakeholders have access to clear information about its laws and programs. This work aids with compliance and builds public awareness of the rules.

In FY25, the Commission launched updated campaign finance dashboards that saw record levels of viewership during the 2024 election season. The Commission also completed revisions to its website to present more accurate and timely information.

### **Goal #4: Standardizing and Documenting Critical Business Processes**

One of the Commission’s most essential functions is to establish and document new standard operating procedures that govern how the agency carries out its activities. This behind-the-scenes work helps make the Commission’s core functions more standardized and efficient, enabling better cross-training and onboarding, and ensuring business continuity and consistency over time.

In FY25, the Commission has standardized and documented its core processes across all divisions. This includes building out division-specific Wiki Knowledge Bases, reviewing and overhauling audit processes, creating new trackers for the work of the Policy Division, and integrating automation across program areas. Staff from each division have presented on these processes at monthly all-staff meetings to enhance cross-functional development.

### **Goal #5: Recruitment and Onboarding**

The Commission is only able to carry out its mandate by recruiting, onboarding, and training talented, experienced individuals from across government and the private sector. These efforts to fill new positions authorized in the FY25 budget, backfill vacancies, and convert positions to permanent civil service allow us to retain highly qualified individuals capable of furthering the Commission’s goals.

In FY25, the Commission appointed a new Chair and Vice Chair in February 2025. The Commission also onboarded two new Commissioners in February. The Commission promoted three employees from within during FY25 and hired nine additional employees to fill essential roles. The Commission successfully onboarded and trained new staff.

# City Elections

## City Elections

Fiscal Year 2025 included the November 5<sup>th</sup> general election. This election was the first election held after the passage of Prop H, which consolidated municipal elections in San Francisco to eliminate odd-year elections. In the November 2024 election, voters elected six seats on the Board of Supervisors, the Mayor, Sheriff, District Attorney, City Attorney, and Treasurer. This section highlights some of the initiatives undertaken by the Commission in connection with the 2024 general election.

## Training and Workshops

One of the Ethics Commission's core mandates is to ensure that candidates and others who must comply with campaign finance laws are able to learn and comply with those rules. By taking a compliance-first approach, the Commission supports the purposes of campaign finance laws through education and assistance.

Commission staff emphasized instructor-led trainings for the 2024 election cycle and created two distinct presentations: one for candidate-controlled committees and another for primarily formed and general-purpose committees. Staff held eighteen (18) training sessions, nine (9) of each type of presentation, between May and October of 2024. The days and start times of the training sessions were varied to improve accessibility, and 2 after-hours sessions of each presentation were held to accommodate those who could not attend trainings between 9am and 5pm. Staff plan to use lessons learned from this process to develop a standardized training program for future election cycles in FY26.

In March 2025, staff presented at a meeting of the California Political Treasurers' Association (CPTA) on behalf of the San Francisco Ethics Commission. The presentation focused on two major topics: an overview of campaign finance disclosures that are specific to San Francisco, and a review of information previously presented during a series of Interested Persons meetings regarding the Ethics Commission's "Streamlining Project."

## Campaign Finance Dashboards

The Commission is committed to ensuring that the public, journalists, and other stakeholders have the highest and best access to crucial information about election-related spending. During FY25, the Commission maintained and enhanced the [Campaign Finance Dashboards](#) for the November 2024 election. These dashboards summarize and analyze fundraising and spending in candidate and ballot measure races in San Francisco, helping the public and press understand the campaign disclosures filed with the Commission. A new daily digest auto-update feature, developed for the 2024 election cycle, replaced manual updates for high-level summaries, improving efficiency and timeliness. The Commission also introduced a new dashboard tool to track local general purpose and state committees active in the November election.

Public engagement with the dashboards surged, with viewership for the November 2024 election more than doubling compared to any prior election cycle in the past decade.

Commission staff presented the dashboards at the COGEL 2024 conference in a panel titled “Data to Decisions: Enhancing Transparency and Insight through Government Dashboards,” underscoring the Commission’s leadership in online campaign finance reporting and transparency.

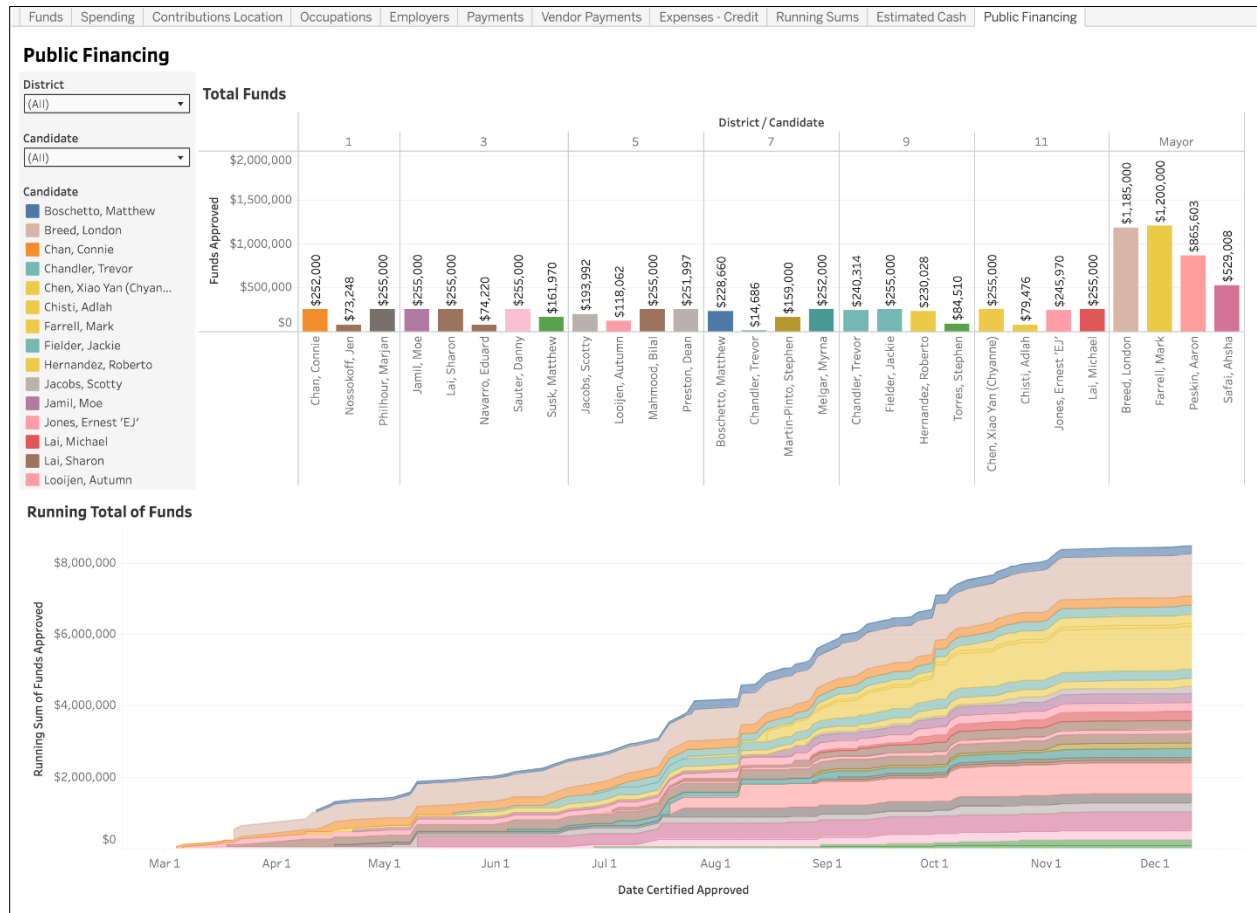
“Public engagement with the dashboards surged, with viewership for the November 2024 election more than doubling compared to any prior election cycle in the past decade.”

### **Public Financing Program**

In every election in which there is a contest for Mayor or Supervisor, the Commission administers the City’s public campaign financing program. This program provides limited public financing to candidates who qualify by receiving a minimum number and amount of contributions from San Francisco residents. The program empowers candidates to run competitive campaigns while reducing their reliance on private fundraising and incentivizes City residents to get involved in elections and make whatever political contributions they are able to. Commission staff assess the eligibility of each candidate who applies for public financing, review each submitted contribution to determine eligibility for matching, and determine the amount of public funds that each candidate is qualified to receive.

The November 2024 election was a record election for the public financing program, in terms of both the number of participating candidates and the total amount of funds disbursed. The Commission approved the disbursement of a total of \$8.8 million in public funds to 27 Mayoral and Supervisorial candidates. Over a period of 10 months, Commission staff reviewed 160 requests and matched more than 13,000 individual contributions. Staff also made 295 adjustments to candidates’ individual expenditure ceilings, which are adjustable limits that sometimes may restrict the amount of money a participating candidate may spend.

Chart A: Image from SF Ethics Public Financing Dashboard





# Enforcement Programs

One of the Commission's essential functions is to ensure accountability in City government by investigating and resolving violations of law within the Commission's jurisdiction. The Commission conducts confidential investigations based on complaints, referrals from other City agencies, or proactive investigative work. Through its work, the Division helps ensure officials and those who interact with City government are held accountable, strengthening fairness, transparency, and public confidence in local government.

## Enforcement Actions

In Fiscal Year 2025, the Enforcement Division advanced a range of significant enforcement actions that underscored both the breadth and impact of its work. The Commission assessed the largest penalty in Commission history, imposing over \$108,000 in fines in a [major campaign finance case](#) involving former mayoral candidate Mark Farrell and his ballot measure committee, for making and accepting prohibited contributions. Also, through its Streamlined Administrative Resolution Program ("SARP"), the Commission resolved multiple matters efficiently by stipulation, ensuring accountability for non-filings, disclosure failures, and disclaimer violations. The Commission also conducted multiple hearings in FY25. First, the Commission conducted a [show-cause hearing](#) on a Sunshine Ordinance Task Force referral, *In the matter of Matthew Lotocki vs. San Francisco Police Department*, where the Commission also reviewed certain limits of its enforcement authority over non-willful violations of the Sunshine Ordinance and voted to take no action without prejudice to the Petitioner on July 11, 2025. Second, the Commission on July 11, 2025, Staff presented another matter involving campaign finance violations before the Commission, *In the Matter of William Walker*, resulting in a [default judgment and penalty](#). Collectively, these actions highlight the Commission's commitment to both impactful case resolution and procedural clarity in San Francisco's ethics enforcement system.

“The Commission assessed the largest penalty in Commission history, imposing over \$108,000 in fines in a [major campaign finance case](#) involving former mayoral candidate Mark Farrell and his ballot measure committee.”

## Operational Initiatives

The Commission strategically advanced its objectives for FY25 through various initiatives designed to enhance fairness, efficiency, and clarity in enforcement processes.

### Expedited Investigations of Certain Campaign Finance Cases in Election Year

The Commission implemented certain measures to allow investigators better handle certain campaign finance-related enforcement matters in a more expedited fashion during

this election year. These measures included issuing subpoenas at the outset of an investigation to compel responses to inquiries and reinforcing its capacity to move cases through the probable cause process more swiftly and as appropriate based on the direction of the investigations. This initiative resulted in the timely resolution of the *Farrell* matter.

### **Improved Automation of Dataset Searches**

In collaboration with the Electronic Disclosure & Data Analysis (“EDDA”) Division, the Enforcement Division continued efforts to automate key investigative processes that historically required time-intensive manual dataset searches. By working with EDDA to develop automated tools and integrating such into its processes, the Division aims to enhance efficiency, improve accuracy, and free staff resources to focus on higher-impact, proactive investigations. These efforts are ongoing and represent a significant step to enhance enforcement workflows and strengthen the Division’s capacity for timely oversight.

### **Revision of the Commission’s Enforcement Regulations**

A primary goal of the Commission in FY 25 was to conduct a comprehensive review of its Enforcement Regulations to ensure they clearly reflect the Commission’s mission and support effective case resolution. As part of this effort, Enforcement Staff conducted four interested persons meetings held on March 4 and March 6, 2025, as well as May 27 and May 29, 2025, to solicit feedback from stakeholders regarding the proposed amendments. Enforcement Staff also gathered additional public and Commission input and have incorporated much of the feedback received into revised proposals, as necessary. This collaborative process is nearing completion, with updates to the recommendations scheduled to be presented to the Commission at this meeting. The Division anticipates finalizing this project by end of this calendar year.

### **Review of the Commission’s Streamlined Administrative Review Program**

The Commission is also undertaking a review of its Streamlined Administrative Resolution Program (“SARP”) to assess the scope and effectiveness of the program, to update violation types eligible for streamlined resolution, and to refine penalty calculations to enhance procedural efficiency. As part of this review, Enforcement Staff conducted research into best practices, identified additional provisions of law for potential inclusion, consulted with other jurisdictions, and convened two interested persons meetings on April 15, 2025 and April 17, 2025, to solicit public input. Enforcement Staff will present its proposed revisions to the Commission at a future monthly meeting, following consultation with the City Attorney’s Office.

### **Timely and Effective Case Resolution – Statistics**

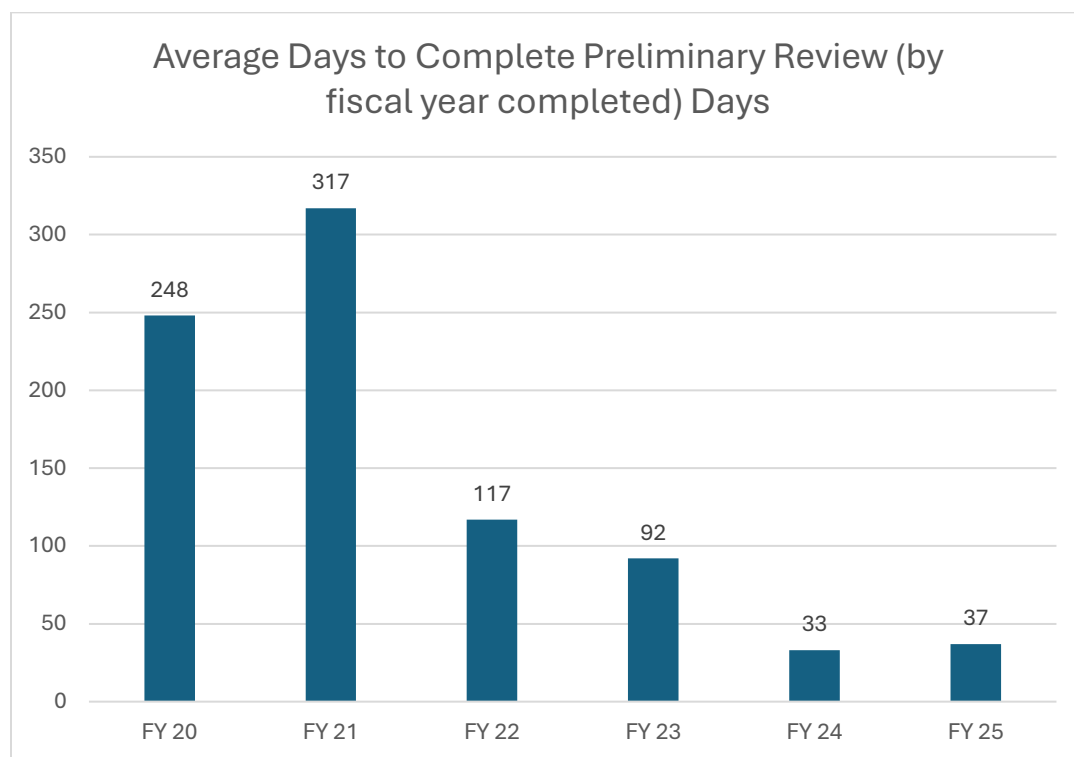
Ensuring that enforcement matters are resolved promptly and fairly is central to the Commission’s mission of promoting accountability and public trust. Over the past several years, the Enforcement Division has focused on refining and streamlining its processes to improve efficiency, which has resulted in substantial reductions in the average time to complete preliminary reviews. These improvements demonstrate the Division’s

commitment to timely case handling while maintaining the rigor and integrity of its investigative work.

#### Average Days to Complete Preliminary Reviews

The average time to complete preliminary reviews has declined sharply over the past several years, reflecting the Division's sustained efforts to improve efficiency. In FY20, preliminary reviews averaged 248 days, rising to 317 days in FY21 before steadily falling to 117 days in FY22, 92 days in FY23, and just 33 days in FY24. In FY25, the average rose slightly to 37 days. This modest increase was due in part to staffing challenges, as the Division operated with vacancies for much of the year following staff promotions to other roles within the Department. With the Enforcement Division now fully staffed, the Division is well positioned to maintain its commitment to timely and efficient case review.

Chart B: Average Days to Complete Preliminary Review

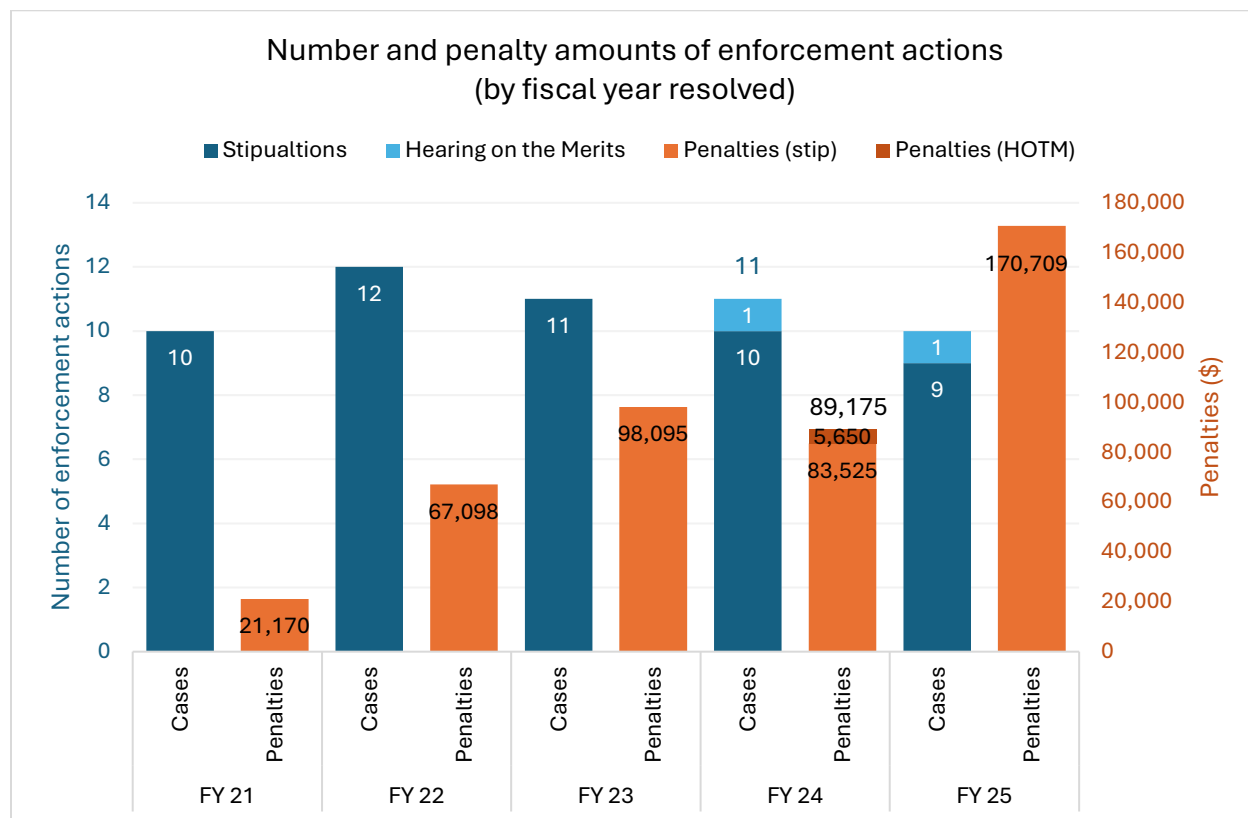


#### Enforcement Actions and Penalties Assessed

Over the past five fiscal years, the number of enforcement actions resolved annually has remained relatively steady, while the total penalties assessed have varied depending on the scope, nature, and severity of the violations. In FY21, the Commission resolved 10 cases with \$21,170 in penalties, followed by 12 cases totaling \$67,098 in FY22. In FY23, 11 cases resulted in \$98,095 in penalties, and in FY24, 11 cases resulted in \$89,175 in penalties. In FY25, the Commission resolved 10 cases but assessed \$170,709 in

penalties—the highest amount in recent years—reflecting the resolution of major campaign finance matters that carried substantial fines.

Chart C: Number and Penalty Amounts of Enforcement Actions



## Whistleblower Retaliation

Protecting whistleblowers from retaliation is a critical component of the Commission’s mandate, as these cases directly implicate the City’s ability to foster a culture of accountability and safeguard those who come forward to report misconduct.

One of the violation types investigated by the Commission is whistleblower retaliation, which occurs when a City officer or employee takes an adverse employment action against a City officer, employee, or contractor for engaging in protected whistleblowing activity. The Whistleblower Protection Ordinance requires the Commission to report annually on these matters.

In FY25, the Commission resolved 23 whistleblower retaliation enforcement matters, two of which had been received in prior years. Of these, 11 were dismissed during preliminary review and 12 were closed after opening an investigation. The Commission received a total of 21 new retaliation complaints during the fiscal year, representing roughly one in every ten complaints received by the Commission. Investigators also engaged in five informal

consultations regarding potential retaliation; however, these did not result in formal complaints because the matters were either anonymous or outside of the Commission's jurisdiction.

The Commission imposed no administrative penalties in whistleblower retaliation cases during FY25. Investigations did not find violations of the Whistleblower Protection Ordinance, and accordingly, no follow-up was conducted regarding any disciplinary actions that departments may have taken in response to the underlying complaints. The types of adverse employment actions alleged in whistleblower complaints during FY25 included:

- Terminations for misconduct, including tampering with IT equipment, threatening a supervisor, undressing in front of a co-worker, and subjecting subordinates to harassment or discrimination.
- Terminations for performance reasons, such as failure to meet probationary standards or inability to accommodate permanent work restrictions.
- Workplace actions such as reduction of responsibilities for refusing to comply with in-office work requirements, non-selection for a leadership role, denial of overtime opportunities, reassignment with a letter of reprimand, and suspension for failing to adhere to telework policies.
- 

The **most common basis for dismissal** of retaliation complaints in FY25 was insufficient evidence that the complainant's protected activity substantially motivated the adverse employment action. In these cases, investigators determined that the actions were taken for legitimate business reasons and were supported by departmental findings, including through the Skelly appeals process.

# Campaign Finance Audits

Like the Commission's enforcement program, audits are a vital way to promote compliance and to ensure accountability for those who do not follow the law. The Commission is required to audit all candidates who receive public funds through the City's public campaign financing program. City law also empowers the Commission to initiate discretionary audits to identify violations of the laws administered by the Commission.

## **Full Redesign of Audit Processes**

In FY25, the Commission overhauled its audit process with the objective of improving timeliness and efficiency. After being unable to complete mandatory audits of publicly financed candidates for the 2020 and 2022 elections, the Commission redesigned its audit process to prioritize the completion of all audits in connection with one year's election by the end of the calendar year of the next regular election. This will ensure that the Commission provides vital oversight of San Francisco campaign committees without allowing audits to compound across elections and create backlogs.

Commission staff developed new protocols in early 2025 based on a review of best practices. The Commission began by recruiting a new audit manager and three new auditors with experience conducting various types of audits and investigations. Staff then reviewed and integrated government auditing standards and the protocols of other campaign finance auditing jurisdictions to modify the Commission's existing audit protocols. After an initial research and development period, staff implemented the new protocols in a first round of audits and will be able to reimplement and continue to improve those procedures through the remainder of the 2024 audit cycle.

Specific improvements to the audit program include a greater focus on project management and use of technology, and the adoption of audit best practices. For example, staff identified standards and developed a uniform process for selecting statistically significant samples, allowing staff to draw conclusions about a committee's activities in an efficient and timely manner. Commission staff created a schedule for audit completion with intermediary milestones, and Commission auditors are now assigned multiple audits at a time. The Commission adopted an audit management system to allow staff to better track progress and developed standardized documentation management protocols. The Commission also created a secure online records portal to receive audit support documentation, no longer needing to rely on hard copies or email.

## **Progress on Mandatory Audits of 2024 Committees**

Commission staff made significant progress in FY25 towards the goal of completing all mandatory 2024 audits by January 2026. The Commission is statutorily required to audit the committees of all 27 candidates who receive public funds in 2024. In January 2025,

staff requested audit records from all 27 committees, then began preliminary reviews of committee filing information. By the time all the committee’s audit records were received in March, staff had determined sample sizes, assessed risk levels, and begun to identify noncompliance. Staff then analyzed bank statements to assess total reported campaign activity for all 27 committees.

After the initial review phase described above, Commission staff divided the 27 committees into three tranches for in-depth testing with staggered start dates and completion dates. For the nine audits contained in the first tranche, staff assessed representative samples of contributions and expenditures for compliance with a broad range of campaign finance rules related to allowability, disclosure, and recordkeeping. By the end of FY25, Commission staff had completed audit work for these nine committees and begun to draft audit reports. All nine reports were later published by August 2025, and staff have made considerable progress on the 12 audits contained in the second tranche.

Chart D: Mandatory Audit Timeline and Progress

2/14/2025	Completed	Audit records received from 27 candidate committees
3/7/2025	Completed	Scoping & Risk Assessment completed for 27 committees
8/15/2025	Completed	Audit reports for 9 <b>Tranche 1</b> committees published
10/24/2025	In Progress	Target publication date for 12 <b>Tranche 2</b> committees
1/30/2026	Planned	Target publication date for 6 <b>Tranche 3</b> committees

## Disclosure Program Administration

One of the Commission’s central mandates is to administer public disclosure programs. These programs provide crucial transparency into the intersection between money and City government, including campaign spending, lobbying, and the financial interests of government officials. The Commission endeavors to administer these programs in ways that achieve high compliance rates, reduce unnecessary barriers, and increase public access to information.

The work of administering disclosure programs consists primarily of building and maintaining information systems, providing advice in response to questions from filers, delivering trainings and written materials, and supporting users of the Commission’s electronic disclosure systems. The filer support and advice work is led by the Commission’s Engagement and Compliance Division, and the information systems work is led by the Commission’s Electronic Disclosure and Data Analysis (EDDA) Division. These divisions collaborate closely to ensure that the Commission provides state-of-the-art filing systems, supports filers to use the systems effectively, and empowers the public to access the information made available through the systems. Below are highlights of the Commission’s disclosure program work during FY25.

### Advice, Guidance, and Technical Assistance

#### Support Requests Data

Commission staff received more than 2,000 requests through the agency’s support portals. The chart below summarizes the number of requests by program area.

Chart E: Support Portal Tickets in FY25 (by program area)

Program	Count of Support Tickets by Program
Campaign Finance and Campaign Consultant	320
Ethics Advice	262
Lobbyist	103
Major Developers and Permit Consultants	10
SEI Form 700 and Departmental Gifts	1,329
<b>Grand Total</b>	<b>2,024</b>

These portals allow staff to track key metrics related to our support requests, including time to resolution. The chart below shows the average time to resolution, measured in business days, across our program areas:



Chart F: Average Time to Resolution in FY25 (by program area)

Program	Time to Resolution (in business days)
Campaign Finance and Campaign Consultant	Approx. ½
Ethics Advice	3.5
Lobbyist	Approx. ½
Major Developers and Permit Consultants	< ½
SEI Form 700 and Departmental Gifts	< ½

These resolution times reflect the amount of time a request is in the “Waiting for Support” and “In Progress” status before being resolved. When staff request additional information needed to provide a complete and accurate answer to the question asked, the system will pause counting towards resolution until the requestor responds.

## Launch of New E-Filing Systems

FY25 marked the successful development and launch of several new e-filing systems, streamlining disclosure processes and improving compliance.

### Departmental Gift Disclosure

As mandated by Proposition D, passed on March 5, 2024, City departments must now report gifts they receive on a monthly basis to the Ethics Commission, enhancing transparency and ensuring timely public disclosure of departmental gift activity. On December 1, 2024, the Commission launched an electronic filing process to simplify compliance and facilitate timely reporting. Departments began reporting gifts received as of November 2024, with the first report due on December 15, 2024. Gift data is published in real time on DataSF and linked from the Commission’s new Departmental Gifts Disclosure page.

The Departmental Gift Form is the first form launched on a new electronic filing platform developed internally by the Commission in preparation for the passage of Proposition D. Designed primarily for filings required under City law, this platform supports a variety of device sizes and offers an efficient, user-friendly interface with batch entry capability for handling large lists of data, which is a common requirement for disclosure forms.

### Campaign Consultant Disclosure

Following the August 9, 2024, amendments to the Campaign Consultant Regulations, staff launched a new electronic filing system for campaign consultant disclosures on December 9, 2024. Built on the same platform as the Departmental Gift Disclosure, the system consolidates six paper forms into two electronic forms, incorporating multi-party electronic signatures and automated public data outputs. Filing records and activity are published in real time on DataSF.

The launch also marked the decommissioning of the temporary COVID-era paper upload system created early in the pandemic, completing the transition to fully electronic submissions across all program areas. This achievement represents a major milestone in the Commission’s yearslong efforts to implement universal electronic filing and ensure systems remain effective and adaptable as technology evolves. Additionally, the new process yields an estimated \$14,000 in annual savings on the Netfile contract by eliminating paper-based document management systems.

#### Additional E-Filing System Enhancements

Additional improvements included a new onboarding process for Form 700 filers and a new electronic form to notify the Commission of positions that must file Form 700 prior to the Board of Supervisors’ next biannual conflict of interest code review.

The filing modernization effort also included a complete backend rebuild for SFEC Form 126f4 Notification of Contract Approval disclosures, improving reliability and efficiency. This upgrade was strategically deployed during the Board of Supervisors’ recess to avoid disruption. In addition, existing datasets on DataSF were improved by joining previously separate tables into combined views, making the disclosure data easier to access and analyze.

### Filing Compliance

#### Statement of Economic Interest (Form 700)

The Commission oversaw a busy annual filing period for the Statement of Economic Interest (Form 700) program. In total, 5,955 individuals were required to submit annual filings this year; comprising 5,477 designated employees in departments across the City government (Designated Filers) and 478 department heads, commissioners, and board members (Ethics Filers). The chart below summarizes on-time and current filing compliance rates as of June 30, 2025, for the 2025 Annual Form 700 filing:

Chart G: Form 700 Filing Compliance

Filer Type	On-Time Compliance Rate	As of 6/30/25
<b>Ethics Filers</b>	94.35%	98.95%
<b>Designated Filers</b>	93.00%	98.06%
<b>All Filers</b>	93.35%	98.14%

As mentioned above, this was the first year all Designated Filers were required to complete the Annual Ethics Training. The chart below summarizes on-time and filing compliance rates as of June 30, 2025 for the 2025 Annual Ethics Training:

Chart H: Ethics Training Compliance

Filer Type	On-Time Compliance Rate	As of 6/30/25
<b>Ethics Filers</b>	90.23%	98.97%
<b>Designated Filers</b>	84.75%	97.35%
<b>All Filers</b>	85.13%	97.47%

#### Campaign Finance

The Engagement & Compliance Division staff received and processed 1,031 Form 460 disclosure statements from recipient committees across the 5 filing deadlines that occurred during FY25. Of the 1,031 statements received from candidate-controlled, primarily formed, and general-purpose recipient committees, 969 (93.9%) were filed timely.

#### Lobbyist

The Lobbyist Disclosure program saw 39 new contact lobbyist registrations for CY25, bringing the total number of registered lobbyists to 212. There is one expenditure lobbyist currently registered with the Commission, with no new expenditure lobbyists registered this year. Staff have processed 1,812 monthly reports from contact lobbyists and nine monthly reports from expenditure lobbyists. The on-time compliance rate in this program remains strong, with 98.4% of all filings being submitted timely.

## Ethics Program Administration

One of the Commission's most important functions is to ensure that City officials and employees act in the best interest of San Franciscans. This work centers around educating thousands of government employees through training, outreach, and support.

### **Ethics Advice Portal**

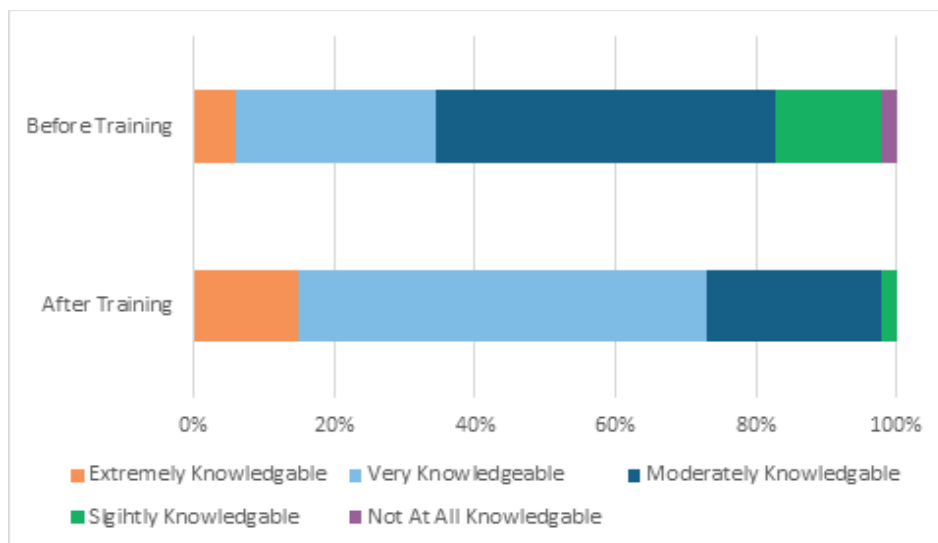
Following the successful launch of support portals for all disclosure programs in FY24, Commission staff created a support portal for ethics advice to streamline the experience of City officials requesting fact-specific guidance. This centralized system has allowed staff to collaborate better when researching complex advice requests and has helped the Engagement and Compliance Division standardize their response process through the use of templates and built-in metrics measuring responsiveness. Each request is tagged with a topic, allowing staff to conduct analysis to better understand the educational needs of the regulated community. Staff intend to review this data frequently to inform decisions about guidance and training material creation.

### **New Ethics Training and Survey**

Proposition D expanded the requirement to complete an ethics training annually from just City officers to all City officials who are required to file a Form 700. This increased the number of trainees from roughly 600 to about 6,000 officials across City departments. Staff designed a new module to accommodate the needs of and ensure relevance to the City employees who were now required to complete the training.

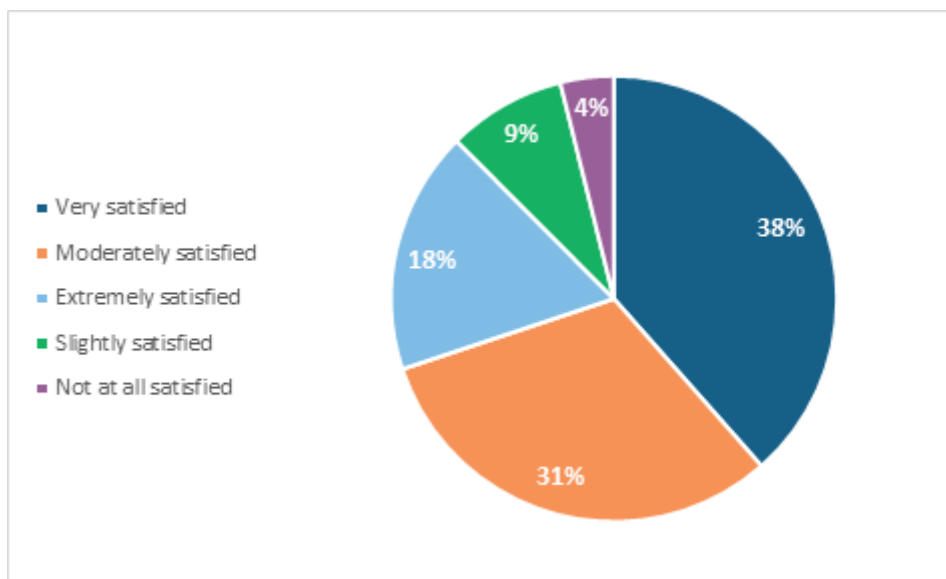
Commission staff created a post-training survey to solicit the feedback of trainees regarding the effectiveness of the modules content. Survey responses from trainees who completed the annual training before the April 1 deadline indicated the new module was successful in increasing their knowledge and awareness of City ethics rules. The chart below shows self-rated knowledge of ethics rules before and after the training:

Chart I Self-Rated Level of Knowledge of Ethics Rules Among Trainees



In addition to soliciting feedback on the content, staff also asked trainees to rate their satisfaction with the style, format, and functionality of the module. The chart below shows respondents satisfaction with the module:

Chart J: Satisfaction with Style, Format, & Functionality of the Annual Ethics Training



In addition to rating their satisfaction, trainees were also asked to provide suggestions to improve the training. Common responses included adding a pause button, providing a transcript of the content, including more examples to better contextualize the rule, and incorporating a glossary of common terms.

Staff analyzed this feedback and began working on a new version of the training for the 2026 filing season, making changes to incorporate this feedback and make other general improvements to the training. The new version will help to address technical issues that frustrated trainees, and is more reliant on plain language explanations with examples to place rules in real world contexts.

## Policy Initiatives

To ensure that San Francisco's ethics laws are strong, enforceable, and workable in practice, the Policy Division studies emerging trends, assesses existing laws and programs, develops policy recommendations for the Commission to consider, and collaborates with the Commission's other divisions to implement new and existing policies. The Commission's policy work produces research, legislative recommendations, regulations, program concepts, and public-facing communications that seek to inform and strengthen the City's pursuit of clean government.

The following are several of the policy projects staff worked on this fiscal year.

### **Streamlining Project**

In January, Staff launched a project to review various programs and policies administered by the Ethics Commission to evaluate if they were effective, efficient, and helping realize the Commission's mission of promoting the highest standards of integrity in City government. Where applicable, this project developed recommendations to streamline and update these policies.

This project focused on campaign consultant rules, the supplemental recusal notification requirement, major developer disclosures, the individual expenditure ceilings in the Public Financing Program, the City's campaign contribution limit, and trustee election filing requirements.

Two interested persons meetings were held by Staff in March on this project and preliminary recommendations were presented to the Commission in June. This project is continuing into the next fiscal year, with three ordinances soon to be introduced at the Board of Supervisors that would enact recommendations stemming from this project.

### **Full Implementation of Prop D**

In March of 2024, voters overwhelmingly approved Proposition D, which was placed on the ballot by the Ethics Commission as part of the Commission's [Government Ethics and Conflict of Interest Review](#) project. [Proposition D](#) made various changes to the City's ethics rules, such as clarifying and expanding the restricted source gift rule, creating a standardized disclosure requirement for gifts to departments, and allowing for penalties to be imposed when a City official fails to disclose a relationship they have with the subject of a decision they are making.

Proposition D and its implementing regulations went into effect on October 12, 2024. Fully implementing Proposition D this fiscal year required significant work from Staff to ensure these changes were effectively rolled out and that City officials were made aware of the changes brought by Proposition D. This included numerous updates to the Commission's

compliance and training materials, and the production and distribution of various Proposition D specific materials.

During the Commission's September meeting, the Commission considered and approved [regulation changes regarding incompatible activities](#). Prior to Proposition D, rules on incompatible activities were documented in department-specific documents, known as Statements of Incompatible Activities (SIAs). Proposition D standardized these rules and moved them into the Campaign & Governmental Conduct Code. This made the departmental SIAs unnecessary, and they were thus discontinued as part of Proposition D. The regulations approved in September were necessary to define terms and clarify how these incompatible activity rules would function city-wide under the changes brought by Proposition D.

Proposition D also extended the City's annual ethics training requirement to all City officials who participate in making government decisions. This change is discussed in more detail above.

### **New Regulation on Campaign Finance Disclaimer Requirements**

In August, the Commission [considered and approved a new regulation](#) regarding exceptions to the City's campaign finance disclaimer requirements. This regulation followed legislative changes to the disclaimer requirements that were approved by the Ethics Commission and Board of Supervisors and went into effect in 2023.

This new regulation gradually waives the City's local disclaimer requirements until either 1) the disclaimer takes up one-third or less of the total advertisement, or 2) the disclaimer requirements are waived to the point that they are comparable to the State's existing requirements. This new exception is intended to allow greater flexibility in the application of City's local disclaimer rules in a way that aligns with the rationale outlined in 2020 court order. The regulation seeks to balance committee interests in maximizing space for their political messages with the public's interest in robust disclaimer rules that aid transparency.

### **Amendments to Campaign Consultant Regulations**

Also in August, the Commission [considered and approved regulation changes](#) regarding the filings of campaign consultants. These regulations clarified that campaign consultants are required to file statements and reports electronically and, in a format prescribed by the Ethics Commission. The changes also removed a regulation that allowed campaign consultants to file statements via facsimile, as the ability to fax documents is no longer necessary with electronic filing in place.



## Legislative Affairs

The Policy Division also monitored and engaged with other policy bodies regarding several key matters. This work has expanded in the first half of 2024, as additional staff were hired to support the Commission's policy work. Important matters include the following:

### Implementation of AB 1170

In 2024, [AB 1170](#) was signed into law by the governor and became effective on January 1, 2025. This legislation changed state laws governing how certain government officials are required to file the Form 700 Statement of Economic Interests. The new law requires that certain top local government officers begin filing the Form 700 with the Fair Political Practices Commission (FPPC) through that agency's online filing system.

Importantly, this new state filing requirement is in addition to, and does not replace, San Francisco's local requirement that those same officers file the Form 700 with the Ethics Commission using the NetFile system. This means that there are 23 local filers who are currently required to file their Form 700s twice, once with the Ethics Commission and then again with the FPPC. This double filing is not desirable, but is currently necessary to ensure the City's Form 700 data is easily accessible to the public and integrated into the City's disclosure system with the rest of the Form 700 filer data.

Staff engaged repeatedly with the FPPC on this issue, both in private and through [public comment](#) during FPPC meetings, and are continuing to do so. A legislative amendment is likely needed to maintain the integrity of the City's disclosure system while removing the double filing requirement. Staff are working with the Mayor's Office and exploring what legislative paths are currently available at the State level to address this issue during the 2026 legislative cycle.

### Consideration of AB 775

During the 2025 legislative cycle, the state legislature has been considering [AB 775](#). This bill aims to improve the behested payment reporting process for State and local elected officials. The current process of reporting these payments is overly complicated and outdated. The bill would update the filing process and create set deadlines for the filings, thus enhancing the ability of regulatory bodies to ensure compliance, increasing transparency, and making behested payment reports available to the public more quickly and easily.

This legislation also offers a flexible model, where forms are filed with the FPPC by default, unless a local agency opts-in to taking on the responsibility of accepting the forms electronically and posting them online. This flexible model shows great promise and could be a template for how to address the issues related to AB 1170 that were discussed above, as this model creates universal e-filing, while also recognizing that some forms are best filed locally.

Staff drafted and shared multiple communications with the FPPC and the state legislature regarding AB 775 throughout 2025. Some of these communications were able to be sent on behalf of the City and County of San Francisco, not just the Ethics Commission. This was possible because Staff presented on AB 775 before the City's State Legislation Committee, which is the body that determines what official positions the City takes on state legislation. Currently, AB 775 is still under consideration and staff are continuing to monitor and engage when prudent.

#### **Inspector General Ballot Measure (Proposition C)**

San Francisco voters passed Proposition C in November 2024. The measure creates the role of Inspector General within the Controller's Office. The Inspector General will lead investigations into fraud, waste and abuse, report on public integrity, and make policy recommendations. The Controller's Office is currently hiring to fill this position in 2025.

Ethics Commission staff participated in multiple meetings with the Board of Supervisor when this measure was being drafted and have had multiple communications with the Controller's Office following the election as they prepare to fill this new position. The focus of these communications has been to help clarify how the Ethics Commission may work with the Inspector General in the future and to ensure roles and responsibilities are divided clearly and appropriately between the two offices.

#### **City Commission Streamlining (Proposition E)**

Voters also approved Proposition E in November 2024, which established the new Commission Streamlining Task Force. This task force is to make recommendations to the Mayor and Board of Supervisors about ways to modify, eliminate, or combine the City's appointive boards and commissions for the more effective, efficient, and economical administration of City and County government. The Task Force will submit its recommendations by February 1, 2026, and will automatically disband on January 31, 2027.

Staff have been working with this new task force to comply with data requests and ensure the task force has a complete and accurate understanding of the Commission's work.

## Departmental Operations

Each year, the Commission identifies opportunities to streamline internal processes, recruit and train staff members, and utilize the City's budget process to strengthen its programmatic work.

### **Commission Membership and Leadership**

There were important changes to the makeup and leadership of the Commission in FY25.

On February 1, District Attorney Brooke Jenkins appointed David Tsai to be a Commissioner.

On February 7, 2025, Chair Theis Finlev concluded his service with the Ethics Commission. On the same date, the Commission unanimously elected Commissioner Argemira Florez-Feng as the new Chair of the Commission, and Commissioner Yaman Salahi as the new Vice Chair of the Commission.

On February 13, 2025, Commissioner Kevin Yeh was appointed to complete Commissioner Finlev's term.

In March, Deputy Director Gayathri Thaikkendiyil concluded her service as the Commission's Deputy Director. In May, the Commission hired Zachary D'Amico as its new Deputy Director. Zach previously served as a Senior Investigator and Legal Analyst with the Commission's Enforcement Division. Before joining the Commission, Zach served as Policy Director and Counsel to Senator Elizabeth Warren for four years, and briefly served as Compliance Counsel at HBO. Zach earned his JD from Harvard Law School and his BA from Villanova University.

### **Commission Staff Recruitment**

The Commission also successfully completed a number of staff recruitments in FY25, including one manager.

In November 2024, Eamonn Wilson began as the Commission's Audit Manager. Eamonn previously served as a Senior Investigator and Legal Analyst with the Commission's Enforcement Division. Before joining the Commission, Eamonn was a Performance Auditor with the California State Auditor's Office. Eamonn earned his Master's in Public Policy from UC San Diego and his BA from UCLA.

In November 2024, the Commission also recruited Bertha Cheung as a Senior Investigator, Laura Mandler as a Compliance Counsel, and Charlie Machado Morrow as an Executive Secretary. In December, the Commission recruited Kyle Hazell as a Client Support Specialist and Eva Lopez Molina as an Auditor. In January 2025, the Commission recruited

Dennis Fiorentinos as an Auditor, Trishia Lim as a Policy Research Specialist, and Manny Mandapat as a Budget and Operations Analyst. Finally, in February, the Commission recruited Emma O'Donnell as an Auditor. Emma has since joined the Enforcement Division as a Senior Investigator.

### **Operational Initiatives**

In addition to the programmatic initiatives discussed above, the Commission undertook a number of operational improvements to enhance the overall effectiveness of its work. These include:

- Establishing several intra-office committees to manage staff events and office space improvements.
- Completing an office reorganization and improvement plan, including removing unused furniture, purchasing new office chairs and a sofa, installing new air purifiers, and providing additional equipment for the shared kitchen.
- Increasing the funding limit for the office's contract with Netfile to provide its electronic filing system to the Commission for campaign finance, public financing, lobbyist, campaign consultant, Form 700 reporting, and ethics and sunshine training.
- Procuring LexisNexis for the Enforcement and Engagement & Compliance Divisions to more effectively conduct legal and factual research.

### **Departmental Budget**

The Ethics Commission's budget is comprised of two main components—an operating budget to support the department's programs and operations, and the Election Campaign Fund. The Commission's annual approved operating budget for FY25 was \$6.86 million with 27.61 funded positions.

The Election Campaign Fund provides a dedicated source of funding for the City's public campaign financing program. In FY25, the fund reached a balance of \$11.5 million before being drawn down by candidates to \$2.4 million.

Departmental budget submissions for the fiscal year beginning July 1, 2025 (FY26) were due to the Mayor's Office in February 2025. The Mayor's FY26 budget instructions required departments to propose ongoing cuts of 15% in FY26 and FY27 from General Fund budgets.

Following two public hearings at regular Commission meetings, the Commission submitted its [FY26-FY27 Budget request](#) to the Mayor's Office. This request sought to secure continued funding for critical staffing. The proposal also included funding to reclassify positions to support enforcement, information systems, and engagement and compliance to improve the effectiveness of the Commission's programs and operations. On May 30<sup>th</sup>, Mayor Lurie released the [proposed two-year budget](#) for FY26-FY27. Under this proposal, four currently funded staff positions at the Ethics Commission would be

eliminated. In addition, two vacated positions would be deleted from the Department's org chart. These positions have been held open to meet attrition savings targets.

Staff presented the Mayor's proposed budget for the Commission at the Board of Supervisors Budget and Appropriations Committee meeting on June 11<sup>th</sup>. Over the following two weeks, staff engaged extensively with members of the Board of Supervisors, the Mayor's Budget Office, and the Controller's Office. Our primary objectives were to underscore the critical need for adequate funding for the Ethics Commission and to identify practical solutions to avoid staff reductions.

At its meeting on June 25, the Budget and Appropriations Committee unanimously approved a Citywide budget for FY26-FY27. This budget was approved by the Board of Supervisors and signed by Mayor Lurie on July 24, 2025. This set the Commission's FY26 budget at \$6.58 million and 26.77 funded positions. Importantly, it included the restoration of all three filled positions that would have been eliminated under the Mayor's initial proposed budget. The final budget restored three filled positions but eliminated the vacant 1823 Senior Program Administrator position within the Engagement and Compliance Division. Additionally, two vacant and unfunded positions were formally removed from the Department's organizational chart.

As part of the Board's process, the Budget and Legislative Analyst (BLA) issued a report recommending a further one-time reduction of \$19,000 from the Commission's budget. This cut affects the Commission's materials, supplies, and subscriptions accounts. We did not oppose these reductions because they are one-time and there are sufficient balances in the accounts to meet current operational needs. It appears that the \$19,000 reduction was included in the budget approved by the Budget and Appropriations Committee.

The final budget for FY26 did not include the Commission's reclassification requests for five positions in the Enforcement Division, Engagement & Compliance Division, and Electronic Disclosure and Data Analysis (EDDA) Division to reflect the increased level of work expected from those roles.

The Commission's budget proposals and related documents are available on its [website](#).

### **Racial Equity Action Plan**

Each City department is required to develop and maintain a Racial Equity Action Plan to capture information regarding their racial equity goals. This includes actions planned, resources committed, indicators of progress, and timelines. Departments are also required to submit progress reports annually to the City's Office of Racial Equity (ORE) on their racial equity efforts.

In FY25, the Commission prioritized implementing strategies to promote greater equity and diversity in its recruitment practices. The Commission adopted standardized job announcements, job promotion through DHR's diversity recruitment channels, implicit

bias training for interviewers, and equitable salary placements. In alignment with that goal, demographic information on the Department's FY25 new hires is provided below:

Chart K: New Hire Ethnicity

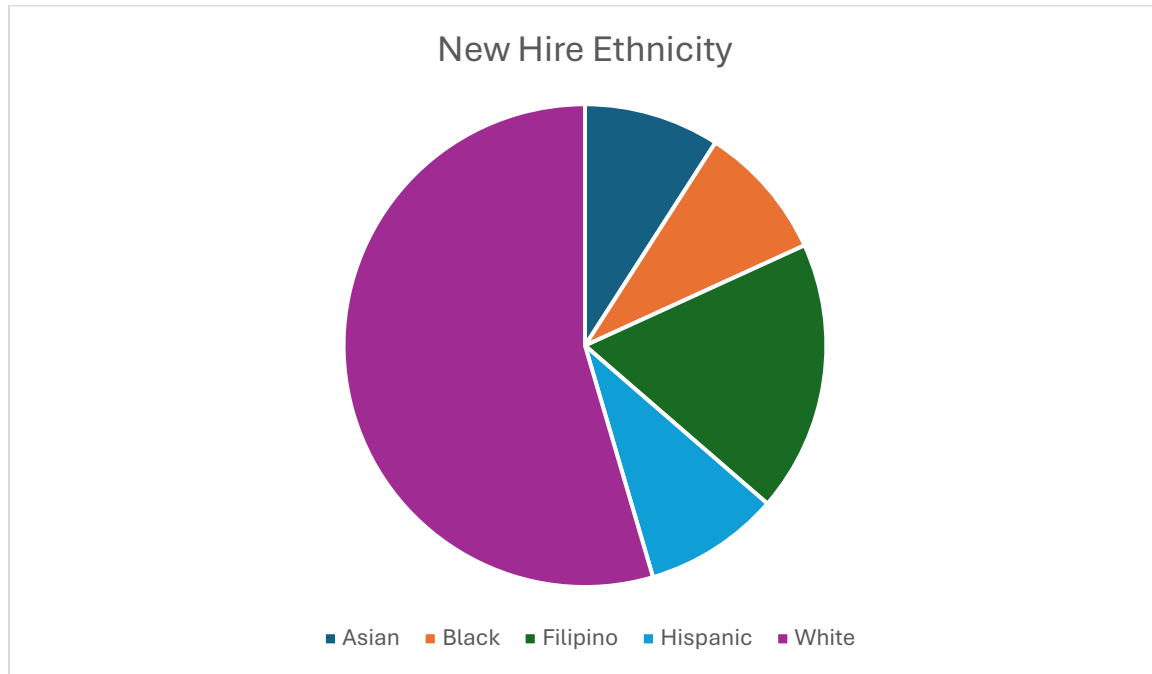
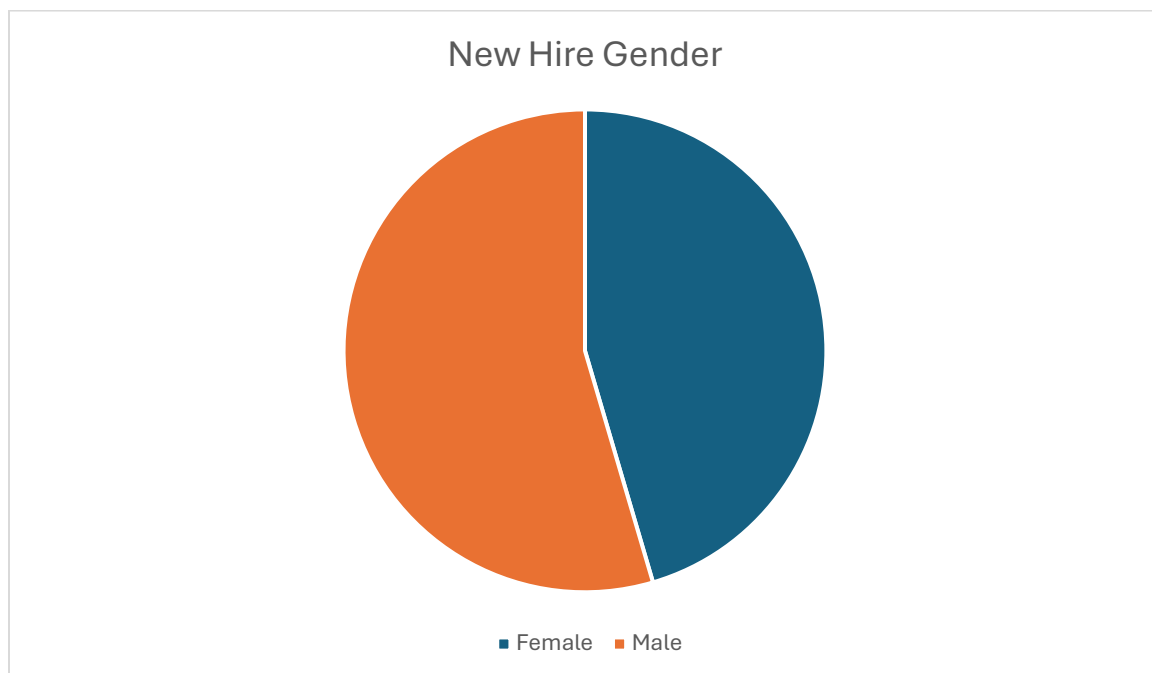


Chart L: New Hire Gender



## Major Goals for FY26

The Commission is poised to make many advancements in its work in FY26. The initiatives in the coming fiscal year will seek to further improve the breadth, efficiency, and timeliness of the Commission's operations. Some of the major projects that are planned for FY26 are:

- **Finishing Mandatory Audits and Initiating Discretionary Audits:** The Commission has made significant progress in its work on 27 mandatory audits of publicly financed committees from the 2024 election. In the coming fiscal year, the Commission plans to complete all mandatory audits and initiate several discretionary audits for committees that did not receive public financing. This will also require completing the recruitment for one auditor position.
- **Retaining and Developing Staff:** The Commission prioritized recruitment and onboarding in FY25, successfully bringing on talented, experienced individuals across all divisions and program areas. In FY26, the Commission will utilize ongoing retention efforts, including an employee survey and regular trainings, in an effort to avoid attrition and continue developing its high-performing staff.
- **Completing Ongoing Program Revitalization Work:** In FY26, the Commission plans to complete several projects to improve program areas. These will include an effort to streamline the Commission's campaign consultant and major developer programs, revise the Commission's Enforcement Regulations, and update the Commission's Streamlined Administrative Resolution Program (SARP). The Commission then plans to shift gears to design and initiate a new policy project, potentially focused on aspects of the City's campaign finance and lobbyist rules.
- **Improving Cross-Divisional Functions:** The Commission intends to enhance its work across divisions to better accomplish its organization objectives. This will likely include efforts to increase regulated community compliance with filing requirements, improve the Commission's website, and integrate the Commission's budget and financial administration to better align with its programmatic efforts.
- **Prioritizing High-Impact Investigations, Proactive Casework, and Automation:** The Commission will continue to allocate resources to investigations with the greatest potential impact, emphasizing accountability, deterrence and public interest. The Commission will also focus on refining its procedures for proactively developing cases and implementing automation of certain investigative functions.