



# San Francisco Ethics Commission

25 Van Ness Avenue, STE 220  
San Francisco, CA 94102-6053  
ethics.commission@sfgov.org  
415-252-3100 | sfethics.org

---

## Campaign Finance Audit Report Jen Nossokoff for District 1 Supervisor 2024 (ID # 1461866)

October 31, 2025

### I. Introduction

This Audit Report summarizes the audit results for the committee, Jen Nossokoff for District 1 Supervisor 2024, FPPC ID # 1461866 (the "Committee"), for the period January 1, 2023, 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 September 12, 2023, as a candidate-controlled committee supporting the election of Jen Nossokoff (the "Candidate") to the office of District 1 Supervisor in the November 5, 2024, election. The Committee remains active as of October 2025.

Candidate Jen Nossokoff served as her Committee's treasurer for the full period covered by the audit and was the primary audit contact on behalf of the Committee during the audit.

For the period covered by the audit, the Committee reported receiving \$98,614—including \$25,366 in monetary contributions, no nonmonetary contributions, and \$73,248 in public financing—and making or incurring \$93,840 in expenditures.

## **V. Material Audit Findings**

Material 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.

Auditors identified no material findings during the audit.

## **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 Candidate improperly paid campaign credit card charges using personal funds**

#### Applicable Law

The committee of a candidate for local office must establish a Campaign Contribution Trust Account at a bank located in the City and County of San Francisco, and all expenditures by the candidate committee for the elective office sought must be made from that account. C&GCC § 1.108.

Any personal funds of a candidate used in the election campaign must be deposited in the committee's bank account, and all campaign expenditures must be made from this account. Gov't Code § 85201(d)-(e). As clarified in the FPPC's Campaign Disclosure Manual for local candidates, "[a] candidate must deposit personal funds in the campaign bank account and make expenditures from that account instead of spending personal funds for the campaign and later seeking reimbursement from campaign funds."

A candidate may establish one or more credit card accounts for the campaign bank account. 2 CCR § 18524(c). Expenditures for payment of charges incurred on each credit card must be made only from the campaign bank account, and the credit card accounts must be used only for expenses associated with the candidate's election to the specific elective office. *Id.*

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, amount of each expenditure, and a brief

description of the consideration received. Gov't Code § 84211(k). Local law additionally requires a committee to report the date of each expenditure required to be disclosed. C&GCC § 1.112(a)(4).

A committee must disclose the information, as pertinent, required by Section 84211(k)(1)-(5) for expenditures paid by the committee to a credit card company if the expenditures reach the \$100 aggregate threshold for that subdivision. 2 CCR § 18421.9. A committee must also disclose the information, as pertinent, required by Section 84211(k)(1)-(5) for each specific expenditure of \$100 or more charged on the candidate's or committee's credit card. *Id.*

Committees must report an accrued expense as of the date on which the goods or services are received, and must report outstanding accrued expenses on each campaign statement until extinguished. 2 CCR § 18421.6(a)-(b). Instructions to Schedule F (Accrued Expenses) of the Form 460 state that when accrued expenses are paid, a committee should report the payment on both Schedule F and on Schedule E (Payments Made). Local law additionally requires a committee to report the date of each expenditure required to be disclosed, including accrued expenses. C&GCC § 1.112(a)(4), C&GCC Reg. § 1.112-1(a)-(b).

### Analysis

The Committee reported a \$1,000 accrued expense to "USAA Credit Card Payments" on Schedule F (Accrued Expenses) of the Form 460, incurred during the period July 1, 2024, to September 21, 2024. Auditors noted that this amount remained outstanding as of December 31, 2024.

The Candidate confirmed to Auditors that the Committee had made several payments using a USAA credit card, and that the Candidate had then used her personal funds to pay off the charges. The Candidate stated that the amount was reported as unpaid because the Committee had not reimbursed her by year's end. By using the Candidate's personal funds to pay the credit card charges directly, without first depositing the funds in the Committee's bank account, the Committee likely violated Section 85201(d) and Regulation 18524(c).

Auditors also determined that the reported expenditure amount of \$1,000 was inaccurate. The Candidate stated that the credit card account had been closed by July 2025 when Auditors began their assessment of the Committee's expenditures, but the Candidate provided receipts for the underlying expenses. Based on these records, the Candidate initially identified the payment to USAA as comprising \$378 to Asana for project management software, \$121 to Google Workspace, and \$498 to Impactive, for a total credit card payment of \$997.

The Candidate later stated that the payments to Asana were not campaign-related but were for personal use and had been inadvertently included in the reported total. Auditors note that while this amount was incorrectly reported, the Committee did not pay this amount because it had not yet reimbursed the Candidate for the charges. However, the Committee likely violated Regulation 18524(c), requiring that a credit card account used for campaign expenses be used only for campaign expenses. This error demonstrates the importance of this rule, as the use of the credit card for both campaign and non-campaign purposes caused the Committee to misreport the expenditure amount.

Auditors reconciled the provided receipts and determined that the campaign-related expenses charged to the credit card and paid by the Candidate comprised \$136 to Google Workspace and \$483 to Impactive, for a total credit card payment of \$619. On September 15, 2025, the Committee reimbursed the Candidate \$619 via payment by check.

Finally, the Candidate's use of personal funds caused the inaccurate reporting of the accrued expense. When the Candidate paid the credit card charge, the accrued expense to USAA was extinguished, but the Committee then effectively owed this amount to the Candidate to comply with the single bank account rule contained in C&GCC Section 1.108. Consequently, and notwithstanding the underlying noncompliance with Section 85201(d), the Committee inaccurately reported the creditor to which it owed the accrued expense for each reporting period during which it reported an outstanding amount to USAA after payment had been made. Reporting an accrued expense of \$619 to the Candidate during this period would more accurately reflect the Committee's activity.

The table below summarizes the accrued expense discussed in this finding, as reported on Schedule F of the Committee's Form 460:

| Payee                     | Reporting Period Incurred | Amount  |
|---------------------------|---------------------------|---------|
| USAA Credit Card Payments | 7/1/2024-9/21/2024        | \$1,000 |

**Finding VI-2. The Committee included disclaimers on several advertisements that did not comply with all applicable requirements**

Applicable Law

State law provides various requirements for disclaimers that committees must include on campaign advertisements. Gov't Code § 84502. Among other requirements, the disclaimer area for a print ad must have a solid white background, be printed in a box on the bottom of at least one page, be set apart from any other printed matter, and all text in the disclaimer area must be in contrasting color. *Id.* § 84504.2(a)(1). The disclaimer on a printed advertisement that is larger than those designed to be individually distributed, such as yard signs or billboards, must have a total height of at least 5% of the height of the advertisement. *Id.* § 84504.2(b).

In addition to complying with the state disclaimer requirements of Government Code Sections 84100 *et seq.*, local law requires advertisements by candidate committees to include the disclaimer statements, "Paid for by (insert the name of the candidate committee)," and "Financial disclosures are available at sfethics.org." C&GCC § 1.161(a)(4). Any disclaimer on a mass mailing, door hanger, flyer, poster, oversized campaign button or bumper sticker, or print advertisement must be printed in at least 14-point, bold font. *Id.* § 1.161(a)(3).

An "advertisement" is any general or public communication that is authorized and paid for by a committee for the purpose of supporting or opposing a candidate for elective office. Gov't Code § 84501(a)(1).

### Analysis

Auditors inspected advertisements related to three expenditures to Accurate Printing. These expenditures were for postcards and banners that advocated for the Candidate's election. Auditors examined copies of the postcards and noted that the disclaimer was included in a significantly smaller font than the surrounding text. The disclaimer was located in the middle of the advertisement on a non-contrasting background, directly beneath the candidate's website and social media information in large font. Consequently, the disclaimer was easily readable and did not comply with Section 1.161(a)(3).

Auditors also examined a copy of the banner, which included only the statement "Jen Nossokoff for Supervisor" and the campaign's logo, but did not contain any disclaimer. This banner likely required the local disclaimer specified under Section 1.161(a)(4) as it appears to be a printed advertisement larger than those designed to be individually distributed pursuant to Government Code Section 84504.2(b).

The table below summarizes the expenditures discussed in this finding:

| Payee             | Expenditure Date | Expenditure Amount | Type of Advertisement |
|-------------------|------------------|--------------------|-----------------------|
| Accurate Printing | 7/18/2024        | \$211              | Postcards             |
|                   | 9/11/2024        | \$155              |                       |
|                   | 10/3/2024        | \$4,198            | Postcards & Banners   |

### **Finding VI-3. The Committee did not disclose contributions that cumulatively exceeded \$100 per contributor**

#### Applicable Law

Committees are required to report the full name, street address, occupation, employer, or, if self-employed, the name of the business, date and amount of contribution, and the cumulative amount of contributions for each individual who cumulatively contributes \$100 or more and a contribution has been made during the campaign statement's reporting period. Gov't Code § 84211(f). "Cumulative amount" means the amount of contributions received in the calendar year. *Id.* § 82018(a).

### Analysis

Through review of third-party credit card transaction activity for contributions made via the platform ActBlue, Auditors identified four instances in which an individual cumulatively contributed \$100 or more, but the Committee did not report the required contributor information for contributions exceeding this threshold. Auditors confirmed that these contributions had been deposited in the Committee's bank account and were not refunded.

Two of the identified contributors made monthly recurring contributions. Josh Kelly made six contributions of \$25 each between June 2024 and November 2024, and Kelly Thacker made eight contributions of \$50 each between January 2024 and August 2024. For these two contributors, the

Committee did not report all contributions received after the contributor reached \$100 in cumulative contributions. The third contributor, Joon Nak Choi, made a single \$100 contribution that the Committee did not disclose.

The table below summarizes the contributions discussed in this finding:

| Contributor   | Contribution Date | Contribution Amount | Cumulative Contribution Amount |
|---------------|-------------------|---------------------|--------------------------------|
| Josh Kelly    | 10/30/2024        | \$25                | \$150                          |
| Kelly Thacker | 7/29/2024         | \$50                | \$500                          |
|               | 8/29/2024         | \$50                |                                |
| Joon Nak Choi | 11/1/2023         | \$100               | \$100                          |

**Finding VI-4. The Committee reported contributor information that did not comply with reporting requirements**

Applicable Law

For each individual from whom a committee has received cumulative contributions of \$100 or more, the committee must disclose the contributor’s full name, street address, occupation, employer, or if self-employed, the name of the business, the date and amount of the contribution, and the cumulative amount of contributions received. Gov’t Code § 84211(f).

Fair Political Practices Commission (“FPPC”) Advice Letter I-07-152 provides guidance about the sufficiency of reported contributor information. As relevant to this finding, reporting occupations such as “philanthropist”, “business person”, “entrepreneur”, and “investor” are not acceptable as they are not sufficiently descriptive of a contributor’s occupation. This advice letter also notes that the use of an acronym when reporting an employer is not acceptable. Additionally, this advice letter notes that a P.O. box does not qualify as a “street address.”

For any contribution received from another committee that qualifies under Section 84211(f), the recipient committee must report the contributing committee’s Secretary of State-assigned identification number on its campaign statement. Gov’t Code § 84211(m), 2 CCR § 18110(b)(2)(E)(9).

Analysis

Auditors performed a facial review of filing data of the 131 contributions reported by the Committee on Schedule A of its Form 460 filings during the audit period and identified four contributions (3.8%) for which the reported occupation, employer, or address did not fully comply with reporting requirements.

For three contributions, the Committee reported the contributor’s employer as an acronym, which does not sufficiently identify an employer according to FPPC Advice Letter I-07-152.

| Contributor     | Date       | Amount | Employer | Occupation  |
|-----------------|------------|--------|----------|-------------|
| Angela Lee      | 10/25/2023 | \$100  | MLSF     | Real Estate |
| Marcus Lee      | 10/25/2023 | \$100  | MLSF     | Real Estate |
| Magdy Tawadrous | 11/7/2023  | \$100  | TPMG     | Physician   |

For contributor Aurangzeb Agha, the Committee reported an occupation of “Entrepreneur”, which also does not sufficiently identify a contributor’s occupation according to FPPC Advice Letter I-07-152.

| Contributor    | Date       | Amount | Employer | Occupation   |
|----------------|------------|--------|----------|--------------|
| Aurangzeb Agha | 10/19/2023 | \$100  | Metrical | Entrepreneur |

Finally, for a contribution made by the Everytown-Demand a Seat PAC, the Committee reported a PO Box for the street address, and did not include an FPPC ID. Advice Letter I-07-152 notes that a PO Box cannot be used as a street address, and Section 84211(m) requires that contributor information reported for contributions from other committees include the FPPC ID.

| Contributor                 | Date      | Amount | Address       |
|-----------------------------|-----------|--------|---------------|
| Everytown-Demand a Seat PAC | 9/17/2024 | \$500  | P.O. Box 4184 |

**Finding VI-5. The Committee did not appropriately report street addresses for several expenditures.**

Applicable Law

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 amount of each expenditure, and a brief description of the consideration received. Gov’t Code § 84211(k). Local law additionally requires a committee to report the date of each expenditure required to be disclosed. C&GCC § 1.112(a)(4).

A “street address” means a real property’s street name, building number, city, state, and zip code. 2 CCR § 18250(a). FPPC Advice Letter I-10-005 further clarifies that the use of a PO Box for an expenditure address is not the same as a street address and should be considered an incomplete address.

Analysis

Auditors performed a facial review of filing data for the 197 expenditures reported by the Committee on Schedule E of its Form 460 filings during the audit period and identified 16 expenditures (8%) to nine payees for which a street address was not properly reported in accordance with Section 84211(k) and Regulation 18250(a). The Committee reported a PO Box number for 13 expenditures to eight entities, and reported a street name but not the building number for three expenditures to one entity.

The table on the following page summarizes the expenditures discussed in this finding:

| Payee                                     | Address                                     | Expenditure Date | Amount  |
|-------------------------------------------|---------------------------------------------|------------------|---------|
| ActBlue                                   | [Somerville, MA PO Box]                     | 9/21/2024        | \$196   |
|                                           |                                             | 12/31/2023       | \$465   |
| Durand Productions/Richmond Review        | [San Francisco PO Box]                      | 11/29/2024       | \$2,700 |
|                                           |                                             | 10/18/2024       | \$2,700 |
| Employers Preferred Insurance Company     | [Henderson, NV PO Box]                      | 9/17/2024        | \$557   |
| GMASS                                     | [Dayton, OH PO Box]                         | 12/6/2024        | \$25    |
|                                           |                                             | 11/6/2024        | \$25    |
| Harris Victory Fund                       | [Washington, DC PO Box]                     | 10/29/2024       | \$62    |
|                                           |                                             | 10/8/2024        | \$130   |
| Hollis Callis                             | [San Francisco address, no building number] | 8/1/2024         | \$60    |
|                                           |                                             | 9/16/2024        | \$113   |
|                                           |                                             | 9/26/2024        | \$167   |
| Political Data Intelligence               | [Norwalk, CA PO Box]                        | 9/24/2024        | \$1,500 |
| San Francisco Women's Political Committee | [San Francisco PO Box]                      | 7/12/2024        | \$100   |
|                                           |                                             | 9/23/2024        | \$1,000 |
| University of San Francisco               | [San Francisco PO Box]                      | 9/4/2024         | \$100   |

#### **Finding VI-6. The Committee did not properly report two accrued expenses**

##### Applicable Law

Committees must report an accrued expense as of the date on which the goods or services are received, and must report outstanding accrued expenses on each campaign statement until extinguished. 2 CCR § 18421.6(a)-(b).

Local law requires a committee to report the date of each expenditure required to be disclosed. C&GCC § 1.112(a)(4). For purposes of this section, an expense is incurred on the date the payment is made or the date consideration is received or performed, whichever is earlier, and an accrued expense is incurred on the date the debt or obligation is contracted. C&GCC Reg. § 1.112-1(a)-(b).

##### Analysis

The Committee reported a \$1,500 expenditure to Political Data Intelligence dated September 24, 2024. Auditors inspected the related invoice and noted that it was dated July 24, 2024. Auditors confirmed that the expenditure had not been reported as an accrued expense on Schedule F of the Form 460 for the reporting period during which the invoice was dated. Pursuant to state and local regulations, this expenditure should have been accrued as of the date the service was incurred.

Auditors also identified a \$3,015 accrued expense to USAA Credit Card Payments reported on Schedule F that remained outstanding as of the end of the audit period on December 31, 2024. However, the Committee reported a payment of this amount to USAA on February 6, 2024, and Auditors confirmed this payment in the Committee's bank statement. Though the Committee reported the payment on

Schedule E, it did not properly extinguish the accrued amount on Schedule F during that period, and continued to report an outstanding balance for four subsequent reporting periods.

The table below summarizes the accrued expenses discussed in this finding:

| Payee                       | Expenditure amount | Reporting period incurred | Reporting period paid |
|-----------------------------|--------------------|---------------------------|-----------------------|
| USAA Credit Card Payments   | \$3,015            | 7/1/2023-12/31/2023       | 1/1/2024-6/30/2024    |
| Political Data Intelligence | \$1,500            | 7/1/2024-9/21/2024        | 9/22/2024-10/19/2024  |

## 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](https://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"> <li>• Calculated total reported contributions and expenditures in the Committee's filings and total reported credits and debits in the Committee's bank statements.</li> <li>• Applied adjustments as needed to account for variations in transaction reporting between sources.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 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"> <li>• Reviewed contributions submitted for public funds matching for compliance with limits and accuracy of contributor information.</li> <li>• 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.</li> <li>• Reviewed each sampled transaction for compliance with state and local requirements regarding contribution restrictions, disclosure, and recordkeeping.</li> <li>• Performed additional targeted testing of contributions identified through analysis of filing data and support records.</li> <li>• 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.</li> </ul> |
| Determine whether the Committee made expenditures for allowable purposes, appropriately disclosed those expenditures, and maintained required expenditure records.                                      | <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Performed additional targeted testing of expenditures identified through analysis of filing data and support records.</li> <li>• Utilized automated procedures to analyze data extracted from the Committee's filings. Identified late-reported transactions and verified identified noncompliance against support records.</li> </ul>                                                                                   |
| Identify any other evidence of potential noncompliance for inclusion in the audit report or referral for further investigation.                                                                         | <ul style="list-style-type: none"> <li>• Analyzed data extracted from the Committee's filings.</li> <li>• Analyzed support records obtained from the Committee.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |