

Patrick Ford  
Executive Director

Olabisi Matthews  
Director of Enforcement

San Francisco Ethics Commission  
25 Van Ness Avenue, Suite 220  
San Francisco, CA 94102  
(415) 252-3100

BEFORE THE SAN FRANCISCO  
ETHICS COMMISSION

In the Matter of	)	SFEC Complaint No. 26-1035
	)	
Franco Finn,	)	
	)	
Respondent.	)	<b>STIPULATION, DECISION, AND ORDER</b>
	)	
	)	
	)	

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THE PARTIES STIPULATE AS FOLLOWS:

1. This Stipulation, Decision, and Order ("Stipulation") is made and entered into by and between Franco Finn (hereinafter "Respondent") and the San Francisco Ethics Commission ("the Commission").
2. Respondent and the Commission agree to settle and resolve all factual and legal issues in this matter and to reach a final disposition without an administrative hearing. Respondent represents that Respondent has accurately furnished to the Commission all information and documents that are relevant to the conduct described in Exhibit A. Upon approval of this Stipulation and full performance of the terms outlined in this Stipulation, the Commission will take no future action against Respondent regarding the violations of law described in Exhibit A, and this Stipulation shall constitute the complete resolution of all claims by the Commission against Respondent related to such violations. Respondent

understands and knowingly and voluntarily waives all rights to judicial review of this Stipulation and any action taken by the Commission or its staff on this matter.

3. Respondent acknowledges responsibility for and agrees to pay an administrative penalty as set forth in Exhibit A. Respondent agrees that the administrative penalty set forth in Exhibit A is a reasonable administrative penalty.

4. Within ten business days of the Commission's approval of this Stipulation, Respondent shall either pay the penalty through the City's online payment portal or otherwise deliver to the following address the sum as set forth in Exhibit A in the form of a check or money order made payable to the "City and County of San Francisco":

San Francisco Ethics Commission  
Attn: Enforcement & Legal Affairs Division  
25 Van Ness Avenue, Suite 220  
San Francisco, CA 94102

5. If Respondent fails to comply with the terms of this Stipulation, then the Commission may reopen this matter and prosecute Respondents under Section C3.699-13 of the San Francisco Charter for any available relief.

6. Respondent understands, and hereby knowingly and voluntarily waives, any and all procedural rights under Section C3.699-13 of the San Francisco Charter and the Commission's Enforcement Regulations with respect to this matter. These include, but are not limited to, the right to appear personally at any administrative hearing held in this matter, to be represented by an attorney at Respondent's expense, to confront and cross-examine all witnesses testifying at the hearing and to subpoena witnesses to testify at the hearing.

7. Respondent understands and acknowledges that this Stipulation is not binding on any other government agency with the authority to enforce the San Francisco Campaign & Governmental Conduct Code section 1.100 *et seq.*, and does not preclude the Commission or its staff from cooperating

with or assisting any other government agency in its prosecution of Respondent for any allegations set forth in Exhibit A, or any other matters related to those violations of law set forth in Exhibit A.

8. This Stipulation is subject to the Commission's approval. In the event the Commission declines to approve this Stipulation, the Stipulation shall become null and void, except Paragraph 9, which shall survive.

9. In the event the Commission rejects this Stipulation, and further administrative proceedings before the Commission are necessary, Respondent agrees that the Stipulation and all references to it are inadmissible. Respondent moreover agrees not to challenge, dispute, or object to the participation of any member of the Commission or its staff in any necessary administrative proceeding for reasons stemming from his or her prior consideration of this Stipulation.

10. This Stipulation, along with the attached Exhibit A, reflects the entire agreement between the parties hereto and supersedes any and all prior negotiations, understandings, and agreements with respect to the transactions contemplated herein. This Stipulation may not be amended orally. Any amendment or modification to this Stipulation must be in writing duly executed by all parties and approved by the Commission at a regular or special meeting.


11. This Stipulation shall be construed under, and interpreted in accordance with, the laws of the State of California. If any provision of the Stipulation is found to be unenforceable, the remaining provisions shall remain valid and enforceable.

12. The parties hereto may sign different copies of this Stipulation, which will be deemed to have the same effect as though all parties had signed the same document.

Dated: 01-21-2026 | 09:17:24 PST

  
PATRICK FORD  
EXECUTIVE DIRECTOR SAN FRANCISCO ETHICS COMMISSION

Dated: 01-21-2026 | 01:31:57 PST

  
FRANCO FINN  
RESPONDENT

**DECISION AND ORDER**

The foregoing Stipulation of the parties in the matter of “Franco Finn, SFEC Complaint No. 26-1035,” including the attached Exhibit A, is hereby accepted as the final Decision and Order of the San Francisco Ethics Commission, effective upon execution below by the Chairperson.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
ARGEMIRA FLÓREZ-FENG, CHAIRPERSON  
SAN FRANCISCO ETHICS COMMISSION

# Exhibit A

## I. Introduction

Franco Finn ("Respondent") assumed office as a Commissioner of the Film Commission on January 5, 2023. As a Commissioner, Respondent is required to disclose his financial interests, as well as complete and file an Ethics Training Certificate and a Sunshine Ordinance Declaration annually pursuant to the City's Conflict of Interest Code. Although Respondent made the required financial disclosures by filing his Form 700, Respondent failed to file the annual Ethics Training Certificate and Sunshine Ordinance Declaration by the required deadline of April 1, 2025, in violation of section 3.1-103(a) of the San Francisco Campaign and Governmental Code ("SF C&GCC"). Respondent failed to complete the 2025 annual filing requirements despite the regular notices sent to all filers by the Ethics Commission's compliance staff before the 2025 deadline and to all non-filers after the filing deadline.

Also, while Respondent's 2025 annual Ethics Training Certificate and Sunshine Ordinance Declaration filings were outstanding, he participated in and voted on matters appearing on Film Commission meeting agendas in violation of the disqualification provision of SF C&GCC section 3.1-102.5(c). Respondent did not vote on any matter that involved a financial conflict of interest.

## II. Applicable Law

### Training Requirements

Members of the Film Commission must file with the Ethics Commission a Sunshine Ordinance Declaration and Certificate of Ethics Training within 30 days of assuming office and annually by April 1<sup>st</sup>. SF C&GCC §§ 3.1-102.5(c), 3.1-103(a)(1).

### Disqualification

A Member of a City board or commission who has failed to file a Certificate of Ethics Training or Sunshine Ordinance Declaration by the applicable filing deadline is disqualified from all participation in and voting on matters listed on their board's or commission's meeting agendas. SF C&GCC § 3.1-102.5(c). Participating in such agenda items while disqualified from doing so is a violation of law. *Id.*

While a member of a City board or commission is disqualified pursuant to SF C&GCC section 3.1-102.5(c), the member will be disqualified from all participation in and voting on matters coming before that board or commission. SF C&GCC § 3.1-102.5(d).

## III. Summary of Material Facts and Analysis

On January 5, 2023, Respondent assumed office as a member of the Film Commission. Respondent was required to file the Ethics Training Certificate and Sunshine Ordinance Declaration each year he served as a commissioner, along with filing his Form 700.

### Training Requirements

Although Respondent met his Form 700 filing requirements disclosing any reportable financial interests, Respondent failed to certify completion of his annual trainings by not filing Ethics Training Certificate and Sunshine Ordinance Declaration forms by the April 1, 2025, deadline. The failure to comply with these requirements was a violation of City law. The requirements that Respondent failed to fulfill are summarized in Table 1.

**Table 1**

Requirement	Assuming Office/Annual	Due Date	Date Filed	Days Late
Ethics Training Certification	2025 Annual	4/01/25	10/26/25	209
Sunshine Declaration	2025 Annual	4/01/25	10/27/25	210

On February 10, 2025, March 3, 2025, March 17, 2025, March 24, 2025, and March 31, 2025, the Ethics Commission's Engagement and Compliance Division sent notices to Respondent's City email address, which was the email address Respondent provided to the Ethics Commission when his NetFile account was created. The notices informed Respondent that he was required to file his Form 700 covering calendar year 2024, Sunshine Ordinance Declaration, and Certificate of Ethics Training, by April 1, 2025.<sup>1</sup> Respondent filed his Form 700 but failed to file his Sunshine Ordinance Declaration and Certificate of Ethics Training by this deadline.

After the filing deadline had passed, on April 15, 2025, and April 29, 2025, the Engagement and Compliance Division sent emails to Respondent's City email address that notified him that he failed to file his Sunshine Ordinance Declaration and his Certificate of Ethics Training, and that late fees and additional administrative penalties may be imposed. These communications also notified Respondent that he was disqualified from participating in or voting on any matter listed on his commission's meeting agenda before, during, or after a meeting while his filing obligations remained unfulfilled. Respondent failed to complete these filing requirements despite these notices sent by the Ethics Commission's engagement and compliance staff.

Finally, as part of the effort by the Enforcement Division to give late filers an additional grace period to fulfill their filing, the Enforcement Division sent an email to Respondent's City email address on August 7, 2025, that notified him that he failed to certify completion of his annual trainings by not filing Certificate of Ethics Training and Sunshine Ordinance Declaration forms, and that he may be subject to an enforcement action if he did fulfill his outstanding filing requirement by August 21, 2025. Respondent failed to file the required forms by this deadline.

The Commission opened an investigation against Respondent under the Commission's Streamlined Administrative Resolution Program ("SARP"). Investigators then contacted Respondent on October 8, 2025, to discuss corrective action and a prescribed timeline for engagement under SARP. Following contact by Investigators, Respondent completed the required trainings and came into compliance by filing the required Certificate of Ethics Training, and Sunshine Ordinance Declaration by October 27, 2025.

### Disqualification

<sup>1</sup> For privacy reasons, the Ethics Commission does not collect or publish the mailing addresses of filers, and was, therefore, only able to contact Respondent via email or telephone. For purposes of ensuring compliance, the Engagement and Compliance Division makes all contacts via the email address provided by filers at the time of assuming office.

As stated above, by failing to comply with any of the filing requirements, an official becomes disqualified from participating in agenda items during any meeting of their board or commission. Even though the Engagement and Compliance Division first notified Respondent of his disqualification on April 15, 2025, and sent a subsequent notice on April 29, 2025, Respondent did not complete both required trainings until October 27, 2025. Respondent was no longer disqualified after he took the training and filed the Certification and Declaration in October 2025.

The Film Commission meeting minutes revealed that from April 2, 2025, through October 27, 2025, Respondent attended at least two meetings of the Film Commission. During these meetings, Respondent participated in discussions, approved meeting minutes, approved a resolution commending the 100<sup>th</sup> anniversary of the Great Star Theater, and approved a resolution to support the City's position on state legislation concerning the California Film and TV tax credit program.

#### **IV. Violations of Law**

##### **Count 1:**

##### **Failure to File Annual Certificate of Ethics Training and Sunshine Ordinance Declaration**

**Count 1:** By failing to comply with the annual Ethics Training and Sunshine Ordinance Training requirements, Respondent violated SF C&GCC section 3.1-102(a).

##### **Count 2:**

##### **Participating in and Voting on Matters Appearing on the Film Commission Meeting Agendas while Disqualified**

**Count 2:** By participating in and voting on matters listed on the Film Commission meeting agendas while disqualified for failing to file the Certificate of Ethics Training and the Sunshine Ordinance Declaration, Respondent violated SF C&GCC section 3.1-102.5(c).

#### **V. Penalty Assessment**

This matter consists of one count for failing to timely file an annual Certificate of Ethics Training and Sunshine Ordinance Declaration, and one count for participating in and voting on matters listed on the agendas of two meetings of the Film Commission while disqualified from doing so.

The San Francisco Charter authorizes the Commission to assess a monetary penalty to the general fund of the City of up to \$5,000 for each violation, or three times the amount which the respondent failed to report properly. SF Charter § C3.699-13(c). Pursuant to its Enforcement Regulations, when determining penalties the Ethics Commission considers all of the relevant circumstances surrounding the case, including but not limited to: (1) the severity of the violation; (2) the presence or absence of any intention to conceal, deceive, or mislead; (3) whether the violation was willful; (4) whether the violation was an isolated incident or part of a pattern; (5) whether the respondent has a prior record of violations of law; (6) the degree to which the respondent cooperated with the investigation and demonstrated a willingness to remedy any violations; and (7) the respondent's ability to pay. SF Ethics Commission Enforcement Regulations § 9(D).

#### Failure to Complete Trainings

Regarding Count 1, it is essential that public employees and officials complete the annual Ethics



and Sunshine Training to ensure that they are consistently reminded of the requirements of the ethics rules and the Sunshine Ordinance, as well as to help enhance their understanding of these rules. By failing to take the required annual training and file the required Certification and Declaration, Respondent not only violated the law, but also failed to avail himself of knowledge of the ethics rules that are designed to help public officials perform their public duties without running afoul of the law.

#### Participating in Agenda Items while Disqualified

Regarding Count 2, because Respondent failed to timely file the annual Certificate of Ethics Training and Sunshine Ordinance Declaration, he was disqualified from participating in and voting on matters agendized before the Film Commission. This rule exists to ensure that if an official has not undergone training in ethics rules and the Sunshine Ordinance as required, they will not participate in government decisions during the time that their trainings remain outstanding. Nonetheless, Respondent participated in and voted on matters before the Film Commission while he was disqualified from doing so. Although Respondent's commission secretary failed to publicly announce that Respondent was disqualified from all participation in and voting on matters before that commission, the responsibility to file and to recuse from participation when he had not fulfilled his outstanding filing requirement rested with Respondent and such failure does not absolve Respondent of such responsibility.

To determine the penalty amounts in this matter, the Enforcement Staff considered the following mitigating facts: Respondent does not have a history of prior enforcement matters with the Commission; the Commission Secretary did not make the required public announcement prior to each meeting; Respondent had timely filed his Statement of Economic Interests for the relevant period and did not vote on any matter involving his financial interests; Respondent took the required corrective action to fulfill his trainings requirements within 30 days of first contact by Enforcement Division staff after the investigation was initiated; and the public harm caused by the violations was minimal given that the actions Respondent took while disqualified had no financial impact upon any party.

In balancing the totality of factors described above and to promote a future deterrent effect, a penalty of \$200 each for Counts 1 and 2 is warranted. The parties agree that this \$400 in total penalties is warranted based on the facts in this matter.

**Count 1 (Failure to File an Annual Certificate of Ethics Training and Sunshine Ordinance Declaration):**  
\$200

**Count 2 (Participation in Agenda Items while Disqualified):** \$200

**Total Penalties: \$400**