

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 Nos. 26-1040
)
Michael Maraviglia,)
)
Respondent.) **STIPULATION, DECISION, AND ORDER**
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)
)

THE PARTIES STIPULATE AS FOLLOWS:

1. This Stipulation, Decision, and Order (Stipulation) is made and entered into by and between Michael Maraviglia (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: 01-15-2026 | 08:59:45 PST



PATRICK FORD
EXECUTIVE DIRECTOR SAN FRANCISCO ETHICS COMMISSION

Dated: 01-13-2026 | 06:24:01 PST



MICHAEL MARAVIGLIA
RESPONDENT

DECISION AND ORDER

The foregoing Stipulation of the parties in the matter of "Michael Maraviglia, SFEC Complaint No. 26-1040," 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

Michael Maraviglia (“Respondent”) is a Manager VI with the Public Utilities Commission (“PUC”). As a Manager VI, Respondent is required to file an Annual Statement of Economic Interests (“Form 700”) to disclose reportable financial interests as required by the City’s Conflict of Interest Code. As a City employee required to file an Annual Form 700, Respondent is also required to annually complete an Ethics Training and file a Certificate of Ethics Training form. Respondent failed to file his Form 700 covering the 2024 calendar year and failed to complete an annual Ethics Training and file a Certificate of Ethics Training form by the required deadline of April 1, 2025, in violation of section 3.1-102(a) of the San Francisco Campaign and Governmental Code (“SF C&GCC”). Following contacts by Ethics Commission investigators, Respondent filed his 2024 Form 700 and a Certificate of Ethics Training form on October 31, 2025. Finally, Investigators did not find any evidence that the decisions in which Respondent participated had a financial effect on any of the financial interests that he eventually reported.

II. Applicable Law

Financial Disclosure

SF C&GCC section 3.1-102(a)(1) requires City officers and many City employees to file a Statement of Economic Interests (“Form 700”). Such officials must file within 30 days of assuming or leaving office and must also file annually by April 1st to report financial interests during the previous calendar year. SF C&GCC §3.1-102(a); 2 CCR § 18730.

City officials who make or participate in making governmental decisions are required under the law to submit a Form 700. These financial disclosure filings are designed as a tool for monitoring the financial interests of public officials to detect and avoid potential conflicts of interests, to promote accountability and public trust, and to ensure that public officials make governmental decisions without regard to their personal financial interests. Failure to disclose reportable financial interests as the law requires deprives the public of full knowledge about instances in which City officers or employees are prohibited from using their official position to influence a governmental decision in which they have a financial interest.

A Manager VI at PUC is a Designated Category 1 filer and must file the Form in electronic format using the Commission’s NetFile e-filing system. A Category 1 filer, must disclose “income (including gifts) from any source, interests in real property, investments, and all business positions in which the designated employee is a director, officer, partner, trustee, employee, or holds any position of management.” SF C&GCC §§ 3.1-107, 3.1-365; *see also* Gov’t Code § 87302.

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Training Requirement

Prior to the passage of Proposition D in 2024, section 3.205 of the SF C&GCC only required City officers to complete an annual Ethics Training. Since the passage of Proposition D, SF C&GCC section 3.205 requires each City officer and designated employee who is required to file a Form 700 to also annually complete an Ethics Training and certify completion of the training by filing a Certificate of Ethics Training form. Such officers and employees must complete the filing requirements within 30 days of assuming office and must also file annually by April 1st. SF C&GCC § 3.1-102(a); 2 CCR 18730. City officers and designated employees who make or participate in making government decisions are also required under the law to certify completion of the Ethics Training.

This Ethics Training is designed as a tool to consistently remind officials of the requirements of the ethics rules, as well as to help enhance their understanding of these rules. By availing themselves of the knowledge in the trainings, officials are reminded of the ethics rules that are designed to help public officials perform their public duties without running afoul of the law.

III. Summary of Material Facts and Analysis

Respondent began his City employment with PUC in July 2000. On January 19, 2024, Respondent assumed office as a Manager VI with PUC after having previously served as a Manager V from January 1, 2021 until January 18, 2024. Respondent was required to file the Form 700 each year that he served in these capacities.

While a Manager V, Respondent mostly filed his Form 700s timely with the Commission from 2022 through 2024 reporting for calendar years 2021 through 2023. However, Respondent failed to file an Annual Form 700 covering the 2024 calendar year.

Also, as part of the implementation of Proposition D in 2024, beginning in 2025, Respondent was required to complete an annual Ethics Training and to certify completion by filing an annual Certificate of Ethics Training form by April 1, 2025. However, Respondent failed to certify completion of his annual training by not filing a Certificate of Ethics Training form by the April 1, 2025, filing deadline.

The failure to comply with these requirements constitutes violations of City law. The requirements that Respondent failed to fulfill are summarized in Table 1.

Table 1

Requirement	Annual	Due Date	Date Filed	Days Late
Form 700	Annual (Covering 2024)	4/1/25	10/31/25	214
Ethics Training	Annual	4/1/25	10/31/25	214

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 emails to Respondent's City email address that notified him that he was required to file his Form 700 covering calendar year 2024 and Certificate of Ethics Training form by April 1, 2025. Respondent failed to file the required forms 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 annual Form 700 and Certificate of Ethics Training form, and that he may be subject to an enforcement action and administrative penalties.

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 file his annual Form 700 and failed to certify completion of his annual training by not filing a Certificate of Ethics Training form, 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.

Accordingly, the Commission opened an investigation against Respondent under the Commission's Streamlined Administrative Resolution Program ("SARP"). Investigators then contacted Respondent with required corrective action and a prescribed timeline for engagement under SARP.

After being contacted by Commission investigators as part of this investigation on October 8, 2025, Respondent filed his outstanding Form 700 covering calendar year 2024 and a Certificate of Ethics Training form on October 31, 2025. The Annual Form 700 filing and Ethics Training Certification form were made 214 days after the deadline. Of note, Respondent indicated that he had no reportable interests on the Form 700 and there was no evidence to suggest otherwise.

IV. Violations of Law

Count 1: Failure to File an Annual Statement of Economic Interests (Form 700)

Count 1: By failing to comply with the Statement of Economic Interest reporting requirement due in 2025, Respondent violated SF C&GCC section 3.1-102(a).

Count 2: Failure to File an Annual Certificate of Ethics Training Form

Count 2: By failing to comply with the Annual Ethics Training reporting requirement due in 2025, Respondent violated SF C&GCC section 3.1-102(a).

V. Penalty Assessment

This matter consists of two counts for failing to timely file an annual Form 700 and an annual Certificate of Ethics Training form.

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).

Respondent's failure to file the Form 700 deprives the public of seeing what a City official's personal financial interests are and assessing whether they are in conflict with any official actions taken by the official. Regardless of whether Respondent had reportable financial interests, the absence of his Form 700 filing for several months prevented the effective monitoring of his financial interests and the identification of when those interests might conflict with his government actions. This important disclosure requirement thus serves both to prevent conflicts of interest and to protect public confidence in governmental processes. In this instance, because Respondent failed to disclose the full extent of his reportable financial interests for several months, he prevented the public from knowing about the existence and scope of his reportable financial interests during that period.

Additionally, it is essential that public employees and officials complete the annual Ethics Training and file the certification form to ensure that they are consistently reminded of the requirements of the ethics rules, as well as to help enhance their understanding of these rules. By failing to take the required annual training, 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 and employees perform their public duties without running afoul of the law.

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; Respondent took the required corrective action to fulfill his Form 700 and Ethics training requirements within 30 days of first contact by Enforcement Division staff after the investigation was initiated; Respondent had no reportable financial interests on the outstanding Form 700 and Investigators did not find any evidence to suggest otherwise. Additionally, prior to 2025, Respondent was not required to complete the annual training and only became acquainted with the training and certification process during the 2025 filing period.

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 Form 700): \$200

Count 1 (Failure to File an Annual Certificate of Ethics Training Form): \$200

Total Penalties: \$400