



San Francisco Ethics Commission

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Date: February 9, 2026

To: Members of the Ethics Commission

From: Olabisi Matthews, Director of Enforcement
Bailey Bryant, Snr. Investigator and Legal Analyst

Re: **Agenda Item 6: Discussion and Possible Action regarding Hearing on the Merits *In the Matter of Charlie Chiem*, SFEC Case No. 24-787**

Summary

This memorandum provides information regarding the Hearing on the Merits *In the Matter of Charlie Chiem*, SFEC Case No. 24-787.

Background

In April 2024, San Francisco Ethics Commission ("Commission") Investigators initiated communications with Charlie Chiem ("Respondent") regarding potential violations of certain provisions of the San Francisco Campaign and Governmental Conduct Code ("SF C&GC Code") related to incompatible activities, misuse of city resources, and accepting gifts from restricted sources. Pursuant to Section 7(B) of the Commission's Enforcement Regulations, on May 2, 2025, the Commission's Director of Enforcement issued a Probable Cause Report against Respondent.

On July 6, 2025, the Commission ratified the Executive Director's Probable Cause Determination as to all counts presented in the Probable Cause Report. Upon ratification, the matter became eligible to proceed to an administrative hearing.

On December 12, 2025, the Enforcement Division appeared before the Commission to address certain procedural matters that required resolution before the commencement of the administrative hearing. Neither Respondent nor the Enforcement Division submitted any pre-hearing motions or communicated any intention to do so. Accordingly, on December 15, 2025, the Executive Director issued formal notice of the hearing on the merits, setting the hearing for February 13, 2026.

On January 14, 2026, the Enforcement Division submitted its Hearing Brief and accompanying materials to the Respondent and all Commissioners. Respondent did not submit a Response Brief or provide a witness list or list of exhibits. In its Hearing Brief, the Enforcement



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Division presented nineteen counts of violations of the SF C&GC Code and the California Government Code ("Cal. Gov't Code"), as follows:

COUNT ONE: Respondent violated SF C&GC Code § 3.218 and the SFMTA's Statement of Incompatible Activities § IV(A) by using City resources to attend hundreds of webinars unrelated to his employment.

COUNT TWO: Respondent violated SF C&GC Code § 3.218 and the SFMTA's Statement of Incompatible Activities § IV(A) by using City resources to create fake e-mail addresses for personal purposes.

COUNT THREE: Respondent violated SF C&GC Code § 3.218 and the SFMTA's Statement of Incompatible Activities § IV(C) by using his City e-mail and title for communications that created the false appearance that Respondent was acting in an official capacity.

COUNT FOUR: Respondent violated SF C&GC Code § 3.218 and the SFMTA's Statement of Incompatible Activities § IV(C) by holding himself out as a representative of his department without authorization.

COUNT FIVE: Respondent violated SF C&GC Code § 3.218 and the SFMTA's Statement of Incompatible Activities § III(A)(1)(b) by accepting gifts from businesses seeking to enter into a contract with his Department.

COUNT SIX: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the August 20, 2021 San Francisco Giants game from Synack, a restricted source technology and software company.

COUNT SEVEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted two tickets to the September 28, 2022 San Francisco Giants game and merchandise from Informatica and LumenData, restricted source technology and software companies.



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COUNT EIGHT: Respondent violated SF C&GC Code § 3.216(b) when he accepted two tickets and an Uber voucher to the October 14, 2022¹ San Jose Sharks game from Darktrace, a restricted source technology and software company.

COUNT NINE: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the October 23, 2022 San Francisco 49ers game from Darktrace, a restricted source technology and software company.

COUNT TEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the April 26, 2023 San Francisco Giants game from Netskope, a restricted source technology and software company

COUNT ELEVEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the May 16, 2023 San Francisco Giants game from LumApps, a restricted source technology company.

COUNT TWELVE: Respondent violated SF C&GC Code § 3.216(b) when he accepted two tickets and Uber vouchers to the June 20, 2023 San Francisco Giants game from Sysdig and Cocode, restricted source technology and software companies.

COUNT THIRTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the August 16, 2023 San Francisco Giants game and food from KIS and Eaton, restricted source technology and software companies.

COUNT FOURTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the February 24, 2023 Golden State Warriors game and merchandise from Strata, a restricted source technology and software Company.

COUNT FIFTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the July 11, 2022 San Francisco Giants game from Okta, a restricted source technology and software company

¹ The Hearing Brief states the date as October 15, 2022, but the actual date of the event was October 14, 2022.



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COUNT SIXTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the August 4, 2022 San Francisco Giants game from Morpheus Data, Stratascale, and Cohesity, restricted source technology and software companies.

COUNT SEVENTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the February 13, 2023 Golden State Warriors game from Port53 and Cisco, two restricted source technology and software companies.

COUNT EIGHTEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the April 4, 2023 Golden State Warriors game from Genesys, a restricted source technology and software company.

COUNT NINETEEN: Respondent violated SF C&GC Code § 3.216(b) when he accepted a ticket to the April 25, 2023 San Francisco Giants game from Laceworks, a restricted source technology and software company.

Pursuant to the Commission's decision at its December 12, 2025 meeting, the Commission will preside over the hearing as a full body. The Commission also adopted the Enforcement Division's recommendation that the Director of Enforcement submit a proposed Order for consideration by the presiding Commissioners. The Enforcement Division will submit the proposed Order at the commencement of the Hearing on the Merits.

The Enforcement Division has also prepared a proposed Default Order for submission in the event that Respondent fails to appear for the hearing. The Commission may deliberate on the proposed Order or the proposed Default Order, make amendments based on its findings on each count, and adopt a Final Order or Default Order with the affirmative vote of at least three Commissioners.

Action Requested

The hearing on the merits will proceed in accordance with the applicable provisions of the Charter of the City and County of San Francisco, the C&GC Code, the Enforcement Regulations, and the California Administrative Procedure Act. These procedural requirements are also summarized in the Commission's [Enforcement Hearing Guidebook](#) and [Stage Three of the Checklist](#). The Enforcement Division makes the following requests:



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1. If Respondent fails to attend the Hearing on the Merits: the Commission should issue a Default Order if Respondent fails to attend the Hearing on the Merits and impose the recommended penalty amount of \$50,360 for the nineteen distinct violations of law committed by Respondent.
2. If all parties are in attendance and the full Hearing on the Merits takes place: at the end of the hearing, the Commission should find Respondent in violation of all the counts as alleged in the Staff Hearing Brief and impose the recommended penalty amount of \$50,360 for the nineteen distinct violations of law committed by Respondent.