



March 4, 2026

To: Members of the Ethics Commission  
From: Olabisi Matthews, Director of Enforcement  
Eric Willett, Senior Investigator & Legal Analyst  
Bailey Bryant, Senior Investigator & Legal Analyst

Subject: **Agenda Item 9: Discussion and Possible Action regarding Proposed Amendments to the Commission's Streamlined Administrative Resolution Program**

## Summary

This memorandum provides an overview of proposed amendments to the Ethics Commission's [Streamlined Administrative Resolution Program](#) ("SARP").

## Action Requested

The Commission may review, discuss, and approve the proposed amendments as drafted, or it may provide guidance to Staff regarding the proposed amendments.

## Proposed Amendments to the Streamlined Administrative Resolution Program

### Background

In a [July 17, 2013 memo](#) to the Commission, the Executive Director proposed that the Commission implement a set of policies to resolve violations of the Campaign Finance Reform Ordinance ("CFRO") and San Francisco Campaign and Governmental Conduct Code ("SF C&GC Code") section 1.100, et seq. through an expedited process utilizing scheduled or fixed penalties. The policies were intended to help "give more structure and cohesion" to how certain strict liability violations were handled by the Commission, while also preserving investigative resources for more complex or severe kinds of violations that typically require more resources to bring to resolution. As described in the memo, violations of the relevant sections identified within the memo "were generally discovered during a review of campaign finance statements or other disclosure statements and, in general require little, if any, additional investigation or other evidence to show that the violation occurred."

Per the memo, the proposed approach would achieve various objectives, including:

1. Commission resources would be better allocated to investigate more complex violations;
2. Filers and contributors would be further encouraged to comply with contribution limit and disclosure requirements;
3. Filers and contributors would be apprised in advance of the consequences of their violations;
4. Cases would be handled in a more timely manner;



5. The regulated community and members of the public would have assurance that violations of laws subject to the policies would be handled in the same manner;
6. Future public harm would be minimized as filers would need to report their activities or amend previous filings as soon as possible.

Following a discussion of the matter, the Commission voted to adopt the proposed fixed penalties by a unanimous vote, allowing Enforcement Staff to gain a more structured approach to handling the identified violations of the law.

In a [June 24, 2019 memo](#) to the Commission, Staff presented information to the Commission regarding additional efforts of the Enforcement Division to develop a proposal for the Commission to expand its Fixed Penalty Policy created in 2013, in order to handle additional “reporting, disclaimer, and recordkeeping matters through streamlined procedures” and allow for “further realignment of investigative resources for broader scope investigations of greater severity, complexity, or breadth.” Per the memo, the Enforcement Division was in the process of developing a proposal that would place additional violation types, including conduct governed by the Campaign Consultant, Lobbyist and Government Ethics Ordinances, on track for streamlined administrative resolution. The goal of the Enforcement Division was to put new processes in place such that additional matters could be placed on track for streamlined administrative resolution and cases suitable for stipulated settlements through that approach could be resolved as timely and efficiently as possible.

#### *The Streamlined Administrative Resolution Program*

In February 2021, the Commission adopted a significantly expanded version of the fixed penalty policy through the establishment of the Streamlined Administrative Resolution Program (“SARP”).

SARP identifies a specific set of code violations across three articles of the San Francisco Campaign & Governmental Conduct Code (“SFC&GC Code”) that are generally less complex in nature and present lower levels of public harm. The program prescribes fixed penalties for these violations at fines lower than those typically imposed in cases that go through the Commission’s mainline enforcement program. The objectives of SARP are to incentivize prompt compliance, facilitate efficient case resolution, and promote consistent enforcement outcomes. By allowing qualifying matters to be resolved through standardized penalty formulas, the program advances accountability while conserving investigative and prosecutorial resources.

Since its adoption, Commission staff experience, legislative developments, and stakeholder input have identified opportunities to expand, simplify, and clarify the program to enhance its clarity, accessibility, and operational effectiveness.



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### Current Performance

Since the adoption of SARP in February 2021, the Commission has received 744 complaints<sup>1</sup> and of those, 271 cases were identified as preliminarily eligible for resolution under SARP, which represents 36 percent of total complaints that the Commission received during the period since SARP was adopted. Of these 271 SARP cases, 101 were Campaign Finance, 36 were Ethics, 17 were Lobbyist, and 117 were Form 700 non-filer cases. The Commission has resolved 710 cases of the total complaints received and of those, 237 were SARP at resolution. Cases identified to fall within SARP at the initial stage of review but become excluded at a later stage where additional evidence is obtained by investigators that cause the matter to fall within the exclusionary criteria under SARP. Of the total cases resolved under SARP, the Commission approved 19 settlement agreements for a total penalty amount of \$45,821. Of these 19 settlement agreements, 10 were Campaign Finance, 6 were Ethics, and 3 were Lobbyist. Finally, of the remaining SARP case resolutions, 92 were resolved through confidential warning letters to respondents while the remaining 126 cases were closed.

### Purpose of the Proposed Amendments

The proposed amendments to SARP aim to expand coverage by including additional strict liability violations that require minimal investigation, removing obsolete provisions to align with the Commission's Streamlining Legislation, clarifying standards for existing violations to improve consistency, and revising penalties to better reflect the level of harm and encourage corrective action. Together, these amendments will improve efficiency, promote a balanced and fair enforcement process, and strengthen transparency in the Commission's enforcement processes.

## Overview of Proposed Amendments by Category

**1. Proposed New Additions:** the proposed revisions include additional areas of the SF C&GC Code that constitute strict liability violations and meet other SARP criteria described above:

- **Campaign Finance**
  - Recipient and Independent Expenditure committees campaign statement non-filing (SF C&GC Code Sections 1.113, 1.160, 1.162, 1.163).
  - Receipt of Campaign Contribution - Disqualification of Officers (SF C&GC Code Section 1.106; Gov't Code § 84308).
  - Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code Section 1.106; Gov't Code § 85701.5).
  - Improper expenditure (SF C&GC Code Section 1.148(a)).
  - Business Entity contribution disclosures (SF C&GC Code Section 1.124).
  - Contribution from parties to land use matters (SF C&GC Code Section 1.127).
  - Prohibited use of unexpended public funds (SF C&GC Code Section 1.148(c)).

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<sup>1</sup> This number excludes informal complaints received by Enforcement Staff that do not fall within the jurisdiction of the Ethics Commission.



- Member communication disclosures (SF C&GC Code Section 1.163).
- **Lobbying**
  - Employment of City officer or employee (SF C&GC Code Section 2.120(a)).
  - Appointment of lobbyist employee to City office (SF C&GC Code Section 2.120(b)).
- **Government Ethics**
  - Failure to timely complete and file required Ethics Training Certificate or Sunshine Ordinance Declaration (SF C&GC Code Sections 3.102, 3.205).
  - Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code Section 3.1-102.5(c)).

**Effect:** Including the above sections of the code expands the range of violations eligible for SARP.

**2. Proposed Removals:** the proposed removal reflects the legislative update that took effect on July 10, 2022, removing the behested payment reporting requirements from City law.

- San Francisco behested payment reporting requirements

**Effect:** Updates SARP to reflect the removal of provisions that are no longer part of City law.

**3. Clarified:** Several existing provisions are clarified to provide greater certainty:

- **Form 700 (Statement of Economic Interests):** clarifies distinction between late/non-filing and omission of required information.
- **Disclaimer Violations:** simplifies exclusion criteria to focus on likelihood of confusion of an advertisement rather than listing specific missing elements in an advertisement.
- **Contribution/Expenditure Thresholds:** clarifies threshold amounts for contributions and expenditures for consistency by rounding up to the nearest whole dollar.

**Effect:** improves understanding and clarity for respondents and the Commission, reducing disputes over interpretation.

**4. Timeline Revision:** Updates to Table 2 within SARP changes the timeline for engagement with investigators and coming into compliance:

- **Tier One:** Respondent engages with the Ethics Commission, comes into full compliance, and signs the settlement agreement within 30 days
- **Tier Two:** Respondent engages with the Ethics Commission, comes into full compliance, and signs the settlement agreement within 45 days (instead of 60 days)



- **Tier Three:** Respondent engages with the Ethics Commission, comes into full compliance, and signs the settlement agreement within 60 days (instead of 90 days)

**Effect:** improves efficiency of the case resolution process under SARP.

**5. Penalty Revisions:** Updates to Tables 1 and 2 within SARP propose reduced penalties for violation of certain provisions:

- Proposed reduced penalty thresholds for certain ethics violations to better align the severity of the violation with level of public harm.
  - \$200 per violation for tier one (instead of \$500)
  - \$350 per violation for tier two (instead of \$700)
  - \$500 per violation for tier three (instead of \$900)
- Cap penalty amount for all SARP violations at \$1000 per violation for matters that do not resolve with a settlement agreement within the SARP timeframe but still remain within SARP's eligibility criteria and resolve through the Commission's administrative hearing process instead.
- Require corrective action before resolution of disclaimer violations.
- Expand use of warning letters for additional violations.

**Effect:** the proposed changes more accurately reflect the severity of violations while maintaining proportionality and fairness.

**Other Non-Substantive Changes:**

Additionally, all shortform references to the San Francisco Campaign and Governmental Conduct Code have been revised from SF C&GCC to SF C&CG Code for consistency with our internal protocols. Other changes include correction of misspellings, removal of unnecessary capitalizations and pluralization of words that require such.

## Stakeholder Outreach

The Enforcement Division held Interested Persons meetings on April 15 and April 17, 2025. At both meetings, representatives from the Municipal Executives Association, provided feedback that has been incorporated where appropriate. No other participants attended these Interested Persons meetings.

The attached table (Table 1) provides an overview of the proposed amendments and explains the rationale for the amendments presented in **Attachment 1**. For ease of review, the proposed amendments to SARP are marked up in this Attachment.

Table 1: Overview of Proposed SARP Amendments

<b>Overview</b>		
No amendment required.		
<b>General Eligibility Guidelines</b>		
No amendment required.		
<b>Fixed Fine Penalties</b>		
No amendment required.		
<b>Warning Letters</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	N/A	Insert at the beginning of the sentence, "In both SARP and the regular enforcement process."
<b>Exclusions</b>		
No amendment required.		
<b>Types of Violations Eligible</b>		
No amendment required.		
<b>SARP Index 1 – Provisions of Law Included within SARP</b>		
<b>Campaign Finance and Reporting Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	#1. Sponsored committee incorrectly named (SF C&GC Code § 1.106; Gov't Code § 84102(a))	Capitalization: replace "Committee" with "committee"
Non-substantive	#2. Major donor notification by recipient committee (SF C&GC Code § 1.106; Gov't Code § 84105)	Capitalization: replace "Donor" with "donor"
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106, 1.135)	Capitalization: replace "Donor" with "donor" and "Campaign" with "campaign"
Non-substantive	#4. Recipient and Independent Expenditure committees campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160,	Capitalization: replace "Committees" and Campaign" with "committees" and "campaign"

	1.162, 1.163; Gov't Code § 84200)	
Substantive	#4. Recipient and Independent Expenditure committees campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 1.113, 1.160, 1.162, and 1.163. The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of additional strict liability violations of campaign finance reporting sections that require little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov't Code § 84308)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.106; Gov't Code § 84308. The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov't Code § 85701.5)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.106; Gov't Code § 85701.5. The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace "Treasurer" with "treasurer" and "Training" with "training"
Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.148(a). The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign</li> </ul>

		expenditure prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.124. The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution disclosure requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.127. The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.148(c). The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign expenditure prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code § 1.152)	<ul style="list-style-type: none"> <li>Capitalization: replace “Report” with “report”</li> </ul>
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.163. The proposed amendment would include an additional expenditure disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign expenditure disclosure requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		
<b>Lobbyist Provisions</b>		

Category	Code Section	Proposed Change
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 2.120(a). The proposed amendment would include an additional lobbying activity reporting requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Commission’s Proposition D legislation and represents a lobbying activity prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 2.120(b). The proposed amendment would include an additional lobbying activity reporting requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Commission’s Proposition D legislation and represents a lobbying activity prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
<b>Financial Disclosure and Governmental Ethics Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#39. Non or late filing of Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	Pluralization: replace “Interest” with “Interests.”
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>Replace “Omission of” with “Failure to timely disclose”</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>Replace “Interest” with “Interests”</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 3.102, 3.205. The proposed amendment would include an additional governmental ethics reporting requirement.</li> <li><b>Rationale:</b> Failure to file the Form 700 is already included as a SARP-eligible violation. Many respondents who fail to file the Form</li> </ul>

	Declaration (SF C&GC Code §§ 3.102, 3.205)	700 also fail to complete one of the required trainings. Adding these violations to SARP will allow such cases to be handled in full through SARP.
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 3.1-102.5(c). The proposed amendment would include an additional governmental ethics reporting requirement.</li> <li><b>Rationale:</b> Failure to file the Form 700 is already included as a SARP-eligible violation. As proposed above, failure to complete either of the two required trainings would also be added to SARP. Many respondents who fail to file the Form 700 also fail to complete one of the trainings and also participate at a public meeting while disqualified from doing so. Adding this violation to SARP will allow such cases to be handled in full through SARP.</li> </ul>
Non-substantive	#44. Non- or late-filing of conflict of interest recusal notification (SF C&GC Code § 3.209(b))	<ul style="list-style-type: none"> <li>Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”.</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> </ul>
<b>Permit Consultant Provisions</b>		
No amendment required.		
<b>Major Developer Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		
<b>Behested Payments Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>

Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
<b>SARP Table 1 – Conduct Specific Provisions Eligible for SARP</b>		
<b>Campaign Finance and Reporting Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#2. Major donor notification by recipient committee (SF C&GC Code § 1.106; Gov't Code § 84105)	Misspelling: Replace “committe” with “committee”
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106 and 1.135)	Capitalization: replace “Donor,” “Campaign,” and “Statement” with “donor,” “campaign,” and “statement.”
Non-substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	Capitalization: replace “Committee” and “Campaign” with “committee” and “campaign.”
Substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 1.113, 1.160, 1.162, and 1.163. The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of additional strict liability violations of campaign finance reporting sections that require little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>

Non-substantive	#6. Cash contribution or expenditure of \$100 or more (SF C&GC Code § 1.106; Gov't Code § 84300)	<ul style="list-style-type: none"> <li>Delete "than \$500" and insert "\$500 or" between "is" and "less." The proposed amendment would increase the threshold limit by less than one dollar.</li> <li><b>Rationale:</b> The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov't Code § 84308)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #21 <i>Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov't Code § 85701.5)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #21 <i>Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace "Treasurer" and "Training" with "treasurer" and "training."
Non-substantive	#12. Contribution limits (SF C&GC Code § 1.114)	<ul style="list-style-type: none"> <li>Delete "less than \$500" and insert "\$500 or less" between "is" and "in the aggregate". The proposed amendment would increase the threshold limit by less than one dollar.</li> <li><b>Rationale:</b> The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.</li> </ul>
Non-substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>Insert ", " within "\$1500"</li> </ul>

Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of an additional strict liability violation of a campaign expenditure prohibition section that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#19. Business entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#13 Contributor information</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm and are also modeled on the thresholds included within <i>#13 Contributor information</i>. However, the threshold amount was increased here to reflect the higher activity level envisioned under this section.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#21 Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment utilizes relatively low threshold amounts to reflect the seriousness of this violation and that higher activity levels represent more than minimal public harm under this section.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code	Capitalization: replace “Report” with “report.”

	§ 1.152)	
Non-substantive	#25. Disclaimer violations (SF C&GC Code §§ 1.161, 1.162)	<ul style="list-style-type: none"> <li>Delete “*”</li> <li><b>Rationale:</b> The proposed amendment deletes a typographical error.</li> </ul>
Substantive	#25. Disclaimer violations (SF C&GC Code §§ 1.161, 1.162)	<ul style="list-style-type: none"> <li>The proposed amendment would delete some of the specific factors for exclusion from SARP.</li> <li><b>Rationale:</b> The proposed amendment deletes language specifying which components of the missing disclaimer exclude a respondent from participation under SARP and relies instead on the likelihood of confusion as the sole exclusionary factor.</li> </ul>
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within an existing campaign reporting requirement provision included within SARP, found under #20 <i>Bundled contributions reporting</i>.</li> </ul>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		
<b>Lobbyist Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	#30. Lobbyist registration violations (SF C&GC Code § 2.110(a), (b), (d))	<ul style="list-style-type: none"> <li>Capitalization: replace “Registration” with “registration.”</li> <li>Delete “No history of not filing or properly amending registration reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
Non-substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> <li>Capitalization: replace “Report” with “report”.</li> <li>Delete “No history of not filing monthly reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
Substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> <li>The proposed amendment would add an additional factor eligible for a Warning Letter.</li> <li><b>Rationale:</b> The proposed amendment would add a scenario eligible for a Warning Letter</li> </ul>

		that is based upon staff's experience administering the lobbyist program and reflects minimal public harm present in a respondent no longer in a position to cause this violation.
Non-substantive	#35. Lobbyist training (SF C&GC Code § 2.116)	Capitalization: replace "Training" with "training."
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment employs thresholds designed to reflect minimal public harm.</li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment employs thresholds designed to reflect minimal public harm.</li> </ul>
Non-substantive	#38. Lobbyist recordkeeping (SF C&GC Code § 2.135)	<ul style="list-style-type: none"> <li>Insert "." after "are considered material."</li> </ul>
<b>Financial Disclosure and Governmental Ethics Reporting</b>		
Category	Code Section	Proposed Change
Non-substantive	Heading Title	<ul style="list-style-type: none"> <li>Insert "Statement of" at the beginning of the sentence.</li> <li>Delete "Disclosure Statements."</li> <li>Insert "(Form 700)" at the end of the sentence.</li> </ul>
Non-substantive	#39. Non- or late-filing of Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>Delete "No history of failing to file reports and no significant history of late-filed reports."</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> <li>Replace "Interest" with "Interests."</li> </ul>
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interests	<ul style="list-style-type: none"> <li>Replace "Omission of" with "Failure to timely disclose"</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>Replace "Interest" with "Interests."</li> </ul>

	(Form 700) (SF C&GC Code §§ 3.102, 3.242)	
Substantive	#40. Failure to timely disclose required information on Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• Insert “of \$200 or less” between “gift” and “or.” Insert “a” after “or.” Insert “of \$1,000 or less” after “income” and delete “the aggregate value of which was \$500 or less.”</li> <li>• <b>Rationale:</b> The proposed amendment would include clarification to an existing factor for a Warning Letter.</li> <li>• Insert into the place of the second bullet point in the Warning Letters column “The filer’s board or commission did not meet during the reporting period.”</li> <li>• <b>Rationale:</b> The proposed amendment would add a scenario eligible for a Warning Letter that is based upon staff’s experience administering the Form 700 reporting program and reflects minimal public harm present in a respondent who did not preside over any meetings during the relevant period.</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance Declaration (SF C&GC Code §§ 3.102, 3.205)	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics requirement.</li> <li>• <b>Rationale:</b> The proposed amendment reflects minimal public harm and a Warning Letter factor already included in other governmental ethics disclosure filings such as the Form 700.</li> </ul>
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics prohibition.</li> <li>• <b>Rationale:</b> The proposed amendment reflects minimal public harm and a Warning Letter factor already included in other governmental ethics disclosure filings such as the Form 700.</li> </ul>
Non-substantive	#45. Gift limit (SF C&GC Code § 3.216(b))	<ul style="list-style-type: none"> <li>• Delete, “The respondent does not have a history of accepting unlawful gifts.”</li> <li>• <b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>

Non-substantive	#46. Gifts of travel reporting disclosures (SF C&GC Code § 3.216(d))	Capitalization: replace “Gifts,” “Travel,” and “Report” with “gifts,” “travel,” and “report.”
<b>Permit Consultant Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#47. Registration or quarterly Report (SF C&GC Code § 3.410(b) or (c))	<ul style="list-style-type: none"> <li>Capitalization: replace “Permit” and “Consultant” with “permit” and “consultant”.</li> <li>Delete, “No history of not timely filing reports or failing to include material information.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
<b>Major Developers Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#48. Major Developer Report (SF C&GC Code § 3.520)	<ul style="list-style-type: none"> <li>Delete “No history of not timely filing reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
<b>Behested Payments Provisions</b>		
Category	Code Section	Proposed Change
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
<b>SARP Table 2 – Penalties for Eligible Violations of Provisions within SARP</b>		
<b>Campaign Finance and Reporting Provisions</b>		

Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days”</li> </ul>
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106 and 1.135)	Capitalization: replace “Donor” with “donor.”
Non-substantive	#4. Recipient and IE committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov’t Code § 84200)	Capitalization: replace “Committee” and “Campaign” with “committee” and “campaign.”
Substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov’t Code § 84200)	<ul style="list-style-type: none"> <li>The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment utilizes the same threshold levels found currently under this SARP entry.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov’t Code § 84308)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#21 Contractor contribution</i>.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov’t Code § 85701.5)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution related provisions included within SARP, such as those under <i>#10 Campaign Contribution Trust Account</i></li> </ul>

Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace “Treasurer” and “Training” with “treasurer” and “training.”
Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of an additional strict liability violation of a campaign expenditure prohibition section that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution related provisions included within SARP, such as those under <i>#10 Campaign Contribution Trust Account</i>.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#21 Contractor contribution</i>.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#18 Improper Expenditure</i>.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code § 1.152)	Capitalization: replace “Report” with “report.”
Non-substantive	Heading title	Insert “respondent takes any corrective action required and the” between “the” and “matter”.
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within an existing campaign reporting requirement provision</li> </ul>

		included within SARP, found under #25 <i>Disclaimer violations.</i>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
<b>Lobbyist Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#30. Lobbyist registration violations (SF C&GC Code § 2.110(a), (b), (d))	Capitalization: replace “Registration” with “registration.”
Non-substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	Capitalization: replace “Report” with “report.”
Non-substantive	#35. Lobbyist training (SF C&GC Code § 2.116)	Capitalization: replace “Training” with “training”.
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under #30 <i>Lobbyist Registration non-filing or failure to update.</i></li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under #30 <i>Lobbyist Registration non-filing or failure to update.</i></li> </ul>
<b>Financial Disclosure and Governmental Ethics Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#39. Non or late filing of Statement of Economic Interests (Form 700) (SF C&GC Code	Pluralization: replace “Interest” with “Interests”

	§§ 3.102, 3.242)	
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• Replace “Omission of” with “Failure to timely disclose”</li> <li>• <b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>• Replace “Interest” with “Interests”</li> </ul>
Substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• The proposed amendment includes new penalty amounts.</li> <li>• <b>Rationale:</b> The proposed amendment applies a range of penalty amounts to provide flexibility in the assignment of a penalty amount that closely aligns with the violation’s public harm.</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance Declaration (SF C&GC Code §§ 3.102, 3.205)	<ul style="list-style-type: none"> <li>• The proposed amendment would include required trainings filings.</li> <li>• <b>Rationale:</b> The proposed amendment models the penalties found within existing financial disclosure reporting requirements included within SARP, such as those under #39 <i>Non or late filing of Form 700</i>.</li> </ul>
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics requirement.</li> <li>• <b>Rationale:</b> The proposed amendment applies a range of penalty amounts to provide flexibility in the assignment of a penalty amount that closely aligns with the violation’s public harm.</li> </ul>
Non-substantive	#44. Non- or late-filing of conflict of interest recusal notification (SF C&GC Code § 3.209(b))	<ul style="list-style-type: none"> <li>• Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”.</li> <li>• <b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> </ul>
<b>Permit Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>

Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#47. Registration or quarterly Report (SF C&GC Code § 3.410(b) or (c))	Capitalization: replace “Quarterly” and “Report” with “quarterly” and “report.”
<b>Major Developers Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
<b>Behested Payments Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>

Table 1: Overview of Proposed SARP Amendments

<b>Overview</b>		
No amendment required.		
<b>General Eligibility Guidelines</b>		
No amendment required.		
<b>Fixed Fine Penalties</b>		
No amendment required.		
<b>Warning Letters</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	N/A	Insert at the beginning of the sentence, "In both SARP and the regular enforcement process."
<b>Exclusions</b>		
No amendment required.		
<b>Types of Violations Eligible</b>		
No amendment required.		
<b>SARP Index 1 – Provisions of Law Included within SARP</b>		
<b>Campaign Finance and Reporting Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	#1. Sponsored committee incorrectly named (SF C&GC Code § 1.106; Gov't Code § 84102(a))	Capitalization: replace "Committee" with "committee"
Non-substantive	#2. Major donor notification by recipient committee (SF C&GC Code § 1.106; Gov't Code § 84105)	Capitalization: replace "Donor" with "donor"
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106, 1.135)	Capitalization: replace "Donor" with "donor" and "Campaign" with "campaign"
Non-substantive	#4. Recipient and Independent Expenditure committees campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160,	Capitalization: replace "Committees" and Campaign" with "committees" and "campaign"

	1.162, 1.163; Gov't Code § 84200)	
Substantive	#4. Recipient and Independent Expenditure committees campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 1.113, 1.160, 1.162, and 1.163. The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of additional strict liability violations of campaign finance reporting sections that require little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov't Code § 84308)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.106; Gov't Code § 84308. The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov't Code § 85701.5)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.106; Gov't Code § 85701.5. The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace "Treasurer" with "treasurer" and "Training" with "training"
Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.148(a). The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign</li> </ul>

		expenditure prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.124. The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution disclosure requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.127. The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign contribution prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.148(c). The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign expenditure prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code § 1.152)	<ul style="list-style-type: none"> <li>Capitalization: replace “Report” with “report”</li> </ul>
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 1.163. The proposed amendment would include an additional expenditure disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment would include an additional strict liability campaign expenditure disclosure requirement that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		

Lobbyist Provisions		
Category	Code Section	Proposed Change
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 2.120(a). The proposed amendment would include an additional lobbying activity reporting requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Commission’s Proposition D legislation and represents a lobbying activity prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 2.120(b). The proposed amendment would include an additional lobbying activity reporting requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Commission’s Proposition D legislation and represents a lobbying activity prohibition that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Financial Disclosure and Governmental Ethics Provisions		
Category	Code Section	Proposed Change
Non-substantive	#39. Non or late filing of Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	Pluralization: replace “Interest” with “Interests.”
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>Replace “Omission of” with “Failure to timely disclose”</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>Replace “Interest” with “Interests”</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 3.102, 3.205. The proposed amendment would include an additional governmental ethics reporting requirement.</li> <li><b>Rationale:</b> Failure to file the Form 700 is already included as a SARP-eligible violation.</li> </ul>

	Declaration (SF C&GC Code §§ 3.102, 3.205)	Many respondents who fail to file the Form 700 also fail to complete one of the required trainings. Adding these violations to SARP will allow such cases to be handled in full through SARP.
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC § 3.1-102.5(c). The proposed amendment would include an additional governmental ethics reporting requirement.</li> <li><b>Rationale:</b> Failure to file the Form 700 is already included as a SARP-eligible violation. As proposed above, failure to complete either of the two required trainings would also be added to SARP. Many respondents who fail to file the Form 700 also fail to complete one of the trainings and also participate at a public meeting while disqualified from doing so. Adding this violation to SARP will allow such cases to be handled in full through SARP.</li> </ul>
Non-substantive	#44. Non- or late-filing of conflict of interest recusal notification (SF C&GC Code § 3.209(b))	<ul style="list-style-type: none"> <li>Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”.</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> </ul>
<b>Permit Consultant Provisions</b>		
No amendment required.		
<b>Major Developer Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		
<b>Behested Payments Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>

Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
<b>SARP Table 1 – Conduct Specific Provisions Eligible for SARP</b>		
<b>Campaign Finance and Reporting Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#2. Major donor notification by recipient committee (SF C&GC Code § 1.106; Gov't Code § 84105)	Misspelling: Replace “committe” with “committee”
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106 and 1.135)	Capitalization: replace “Donor,” “Campaign,” and “Statement” with “donor,” “campaign,” and “statement.”
Non-substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	Capitalization: replace “Committee” and “Campaign” with “committee” and “campaign.”
Substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov't Code § 84200)	<ul style="list-style-type: none"> <li>Amend to include SF C&amp;GCC §§ 1.113, 1.160, 1.162, and 1.163. The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of additional strict liability violations of campaign finance reporting sections that require little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>

Non-substantive	#6. Cash contribution or expenditure of \$100 or more (SF C&GC Code § 1.106; Gov't Code § 84300)	<ul style="list-style-type: none"> <li>Delete "than \$500" and insert "\$500 or" between "is" and "less." The proposed amendment would increase the threshold limit by less than one dollar.</li> <li><b>Rationale:</b> The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov't Code § 84308)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #21 <i>Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov't Code § 85701.5)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #21 <i>Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace "Treasurer" and "Training" with "treasurer" and "training."
Non-substantive	#12. Contribution limits (SF C&GC Code § 1.114)	<ul style="list-style-type: none"> <li>Delete "less than \$500" and insert "\$500 or less" between "is" and "in the aggregate". The proposed amendment would increase the threshold limit by less than one dollar.</li> <li><b>Rationale:</b> The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.</li> </ul>
Non-substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>Insert ", " within "\$1500"</li> </ul>

Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of an additional strict liability violation of a campaign expenditure prohibition section that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#19. Business entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#13 Contributor information</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm and are also modeled on the thresholds included within <i>#13 Contributor information</i>. However, the threshold amount was increased here to reflect the higher activity level envisioned under this section.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#21 Contractor contribution</i>. Additionally, the contribution threshold amounts for exclusion from the program are designed to exclude activity levels that represent more than minimal public harm.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment utilizes relatively low threshold amounts to reflect the seriousness of this violation and that higher activity levels represent more than minimal public harm under this section.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code	Capitalization: replace “Report” with “report.”

	§ 1.152)	
Non-substantive	#25. Disclaimer violations (SF C&GC Code §§ 1.161, 1.162)	<ul style="list-style-type: none"> <li>Delete “*”</li> <li><b>Rationale:</b> The proposed amendment deletes a typographical error.</li> </ul>
Substantive	#25. Disclaimer violations (SF C&GC Code §§ 1.161, 1.162)	<ul style="list-style-type: none"> <li>The proposed amendment would delete some of the specific factors for exclusion from SARP.</li> <li><b>Rationale:</b> The proposed amendment deletes language specifying which components of the missing disclaimer exclude a respondent from participation under SARP and relies instead on the likelihood of confusion as the sole exclusionary factor.</li> </ul>
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within an existing campaign reporting requirement provision included within SARP, found under #20 <i>Bundled contributions reporting</i>.</li> </ul>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
No amendment required.		
<b>Lobbyist Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Non-substantive	#30. Lobbyist registration violations (SF C&GC Code § 2.110(a), (b), (d))	<ul style="list-style-type: none"> <li>Capitalization: replace “Registration” with “registration.”</li> <li>Delete “No history of not filing or properly amending registration reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
Non-substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> <li>Capitalization: replace “Report” with “report”.</li> <li>Delete “No history of not filing monthly reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
Substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> <li>The proposed amendment would add an additional factor eligible for a Warning Letter.</li> <li><b>Rationale:</b> The proposed amendment would add a scenario eligible for a Warning Letter</li> </ul>

		that is based upon staff's experience administering the lobbyist program and reflects minimal public harm present in a respondent no longer in a position to cause this violation.
Non-substantive	#35. Lobbyist training (SF C&GC Code § 2.116)	Capitalization: replace "Training" with "training."
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment employs thresholds designed to reflect minimal public harm.</li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment employs thresholds designed to reflect minimal public harm.</li> </ul>
Non-substantive	#38. Lobbyist recordkeeping (SF C&GC Code § 2.135)	<ul style="list-style-type: none"> <li>Insert "." after "are considered material."</li> </ul>
<b>Financial Disclosure and Governmental Ethics Reporting</b>		
Category	Code Section	Proposed Change
Non-substantive	Heading Title	<ul style="list-style-type: none"> <li>Insert "Statement of" at the beginning of the sentence.</li> <li>Delete "Disclosure Statements."</li> <li>Insert "(Form 700)" at the end of the sentence.</li> </ul>
Non-substantive	#39. Non- or late-filing of Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>Delete "No history of failing to file reports and no significant history of late-filed reports."</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> <li>Replace "Interest" with "Interests."</li> </ul>
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interests	<ul style="list-style-type: none"> <li>Replace "Omission of" with "Failure to timely disclose"</li> <li><b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>Replace "Interest" with "Interests."</li> </ul>

	(Form 700) (SF C&GC Code §§ 3.102, 3.242)	
Substantive	#40. Failure to timely disclose required information on Statement of Economic Interests (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• Insert “of \$200 or less” between “gift” and “or.” Insert “a” after “or.” Insert “of \$1,000 or less” after “income” and delete “the aggregate value of which was \$500 or less.”</li> <li>• <b>Rationale:</b> The proposed amendment would include clarification to an existing factor for a Warning Letter.</li> <li>• Insert into the place of the second bullet point in the Warning Letters column “The filer’s board or commission did not meet during the reporting period.”</li> <li>• <b>Rationale:</b> The proposed amendment would add a scenario eligible for a Warning Letter that is based upon staff’s experience administering the Form 700 reporting program and reflects minimal public harm present in a respondent who did not preside over any meetings during the relevant period.</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance Declaration (SF C&GC Code §§ 3.102, 3.205)	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics requirement.</li> <li>• <b>Rationale:</b> The proposed amendment reflects minimal public harm and a Warning Letter factor already included in other governmental ethics disclosure filings such as the Form 700.</li> </ul>
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics prohibition.</li> <li>• <b>Rationale:</b> The proposed amendment reflects minimal public harm and a Warning Letter factor already included in other governmental ethics disclosure filings such as the Form 700.</li> </ul>
Non-substantive	#45. Gift limit (SF C&GC Code § 3.216(b))	<ul style="list-style-type: none"> <li>• Delete, “The respondent does not have a history of accepting unlawful gifts.”</li> <li>• <b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>

Non-substantive	#46. Gifts of travel reporting disclosures (SF C&GC Code § 3.216(d))	Capitalization: replace “Gifts,” “Travel,” and “Report” with “gifts,” “travel,” and “report.”
<b>Permit Consultant Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#47. Registration or quarterly Report (SF C&GC Code § 3.410(b) or (c))	<ul style="list-style-type: none"> <li>Capitalization: replace “Permit” and “Consultant” with “permit” and “consultant”.</li> <li>Delete, “No history of not timely filing reports or failing to include material information.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
<b>Major Developers Provisions</b>		
Category	Code Section	Proposed Change
Non-substantive	#48. Major Developer Report (SF C&GC Code § 3.520)	<ul style="list-style-type: none"> <li>Delete “No history of not timely filing reports.”</li> <li><b>Rationale:</b> The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.</li> </ul>
<b>Behested Payments Provisions</b>		
Category	Code Section	Proposed Change
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>

SARP Table 2 – Penalties for Eligible Violations of Provisions within SARP		
Campaign Finance and Reporting Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days”</li> </ul>
Non-substantive	#3. Major donor campaign statement non-filing (SF C&GC Code §§ 1.106 and 1.135)	Capitalization: replace “Donor” with “donor.”
Non-substantive	#4. Recipient and IE committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov’t Code § 84200)	Capitalization: replace “Committee” and “Campaign” with “committee” and “campaign.”
Substantive	#4. Recipient committee campaign statement non-filing (SF C&GC Code §§ 1.106, 1.113, 1.135, 1.160, 1.162, 1.163; Gov’t Code § 84200)	<ul style="list-style-type: none"> <li>The proposed amendment would include additional required campaign statement filings such as supplemental campaign statements during signature gathering periods, campaign finance filings for draft committees, electioneering communications disclosure statements, and disclosure statements for member communications.</li> <li><b>Rationale:</b> The proposed amendment utilizes the same threshold levels found currently under this SARP entry.</li> </ul>
Substantive	#7. Receipt of Campaign Contribution - Disqualification of City Officers (SF C&GC Code § 1.106; Gov’t Code § 84308)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #21 <i>Contractor contribution</i>.</li> </ul>
Substantive	#8. Failure to receive consent from a contributor to make recurring contributions (SF C&GC Code § 1.106; Gov’t Code § 85701.5)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution related provisions included within SARP, such as those under #10 <i>Campaign Contribution Trust Account</i></li> </ul>

Non-substantive	#9. Candidate and treasurer training (SF C&GC Code § 1.107)	Capitalization: replace “Treasurer” and “Training” with “treasurer” and “training.”
Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment would allow for the streamlined resolution of an additional strict liability violation of a campaign expenditure prohibition section that requires little, if any, additional investigation or evidence to show that the violation occurred.</li> </ul>
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution disclosure requirement provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution related provisions included within SARP, such as those under <i>#10 Campaign Contribution Trust Account</i>.</li> </ul>
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#21 Contractor contribution</i>.</li> </ul>
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional expenditure prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under <i>#18 Improper Expenditure</i>.</li> </ul>
Non-substantive	#24. Threshold report violation (SF C&GC Code § 1.152)	Capitalization: replace “Report” with “report.”
Non-substantive	Heading title	Insert “respondent takes any corrective action required and the” between “the” and “matter”.
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional contribution prohibition provision.</li> <li><b>Rationale:</b> The proposed amendment models the language found within an existing campaign reporting requirement provision</li> </ul>

		included within SARP, found under #25 <i>Disclaimer violations.</i>
<b>Campaign Consultant Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
<b>Lobbyist Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#30. Lobbyist registration violations (SF C&GC Code § 2.110(a), (b), (d))	Capitalization: replace “Registration” with “registration.”
Non-substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	Capitalization: replace “Report” with “report.”
Non-substantive	#35. Lobbyist training (SF C&GC Code § 2.116)	Capitalization: replace “Training” with “training”.
Substantive	#36. Employment of City officer or employee (SF C&GC Code § 2.120(a))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under #30 <i>Lobbyist Registration non-filing or failure to update.</i></li> </ul>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> <li>The proposed amendment would include an additional lobbying activity reporting provision.</li> <li><b>Rationale:</b> The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under #30 <i>Lobbyist Registration non-filing or failure to update.</i></li> </ul>
<b>Financial Disclosure and Governmental Ethics Provisions</b>		
<b>Category</b>	<b>Code Section</b>	<b>Proposed Change</b>
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#39. Non or late filing of Statement of Economic Interests (Form 700) (SF C&GC Code	Pluralization: replace “Interest” with “Interests”

	§§ 3.102, 3.242)	
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• Replace “Omission of” with “Failure to timely disclose”</li> <li>• <b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> <li>• Replace “Interest” with “Interests”</li> </ul>
Substantive	#40. Failure to timely disclose required information on Statement of Economic Interest (Form 700) (SF C&GC Code §§ 3.102, 3.242)	<ul style="list-style-type: none"> <li>• The proposed amendment includes new penalty amounts.</li> <li>• <b>Rationale:</b> The proposed amendment applies a range of penalty amounts to provide flexibility in the assignment of a penalty amount that closely aligns with the violation’s public harm.</li> </ul>
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance Declaration (SF C&GC Code §§ 3.102, 3.205)	<ul style="list-style-type: none"> <li>• The proposed amendment would include required trainings filings.</li> <li>• <b>Rationale:</b> The proposed amendment models the penalties found within existing financial disclosure reporting requirements included within SARP, such as those under #39 <i>Non or late filing of Form 700</i>.</li> </ul>
Substantive	#42. Disqualification by members of boards and commissions from participation in, or voting on, matters on meeting agenda (SF C&GC Code § 3.1-102.5(c))	<ul style="list-style-type: none"> <li>• The proposed amendment would include an additional government ethics requirement.</li> <li>• <b>Rationale:</b> The proposed amendment applies a range of penalty amounts to provide flexibility in the assignment of a penalty amount that closely aligns with the violation’s public harm.</li> </ul>
Non-substantive	#44. Non- or late-filing of conflict of interest recusal notification (SF C&GC Code § 3.209(b))	<ul style="list-style-type: none"> <li>• Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”.</li> <li>• <b>Rationale:</b> The proposed amendment would clarify the violation type to include late disclosure of required information.</li> </ul>

Permit Consultant Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Non-substantive	#47. Registration or quarterly Report (SF C&GC Code § 3.410(b) or (c))	Capitalization: replace “Quarterly” and “Report” with “quarterly” and “report.”
Major Developers Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> <li>Replace “60 days” and “90 days” with “45 days” and “60 days.”</li> </ul>
Behested Payments Provisions		
Category	Code Section	Proposed Change
Substantive	#37. Officer Behested Payment report non-filing by officer (SF C&GC Code § 3.610)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>
Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> <li>The proposed amendment would delete this filing requirement.</li> <li><b>Rationale:</b> The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.</li> </ul>