



City & County of San Francisco
Ethics Commission



PROPOSED SARP AMENDMENTS



Introduction

The purpose of this presentation is to provide an overview of the Commission’s Streamlined Administrative Resolution Program (“SARP”) and to advocate that Commissioners approve the proposed amendments as drafted or provide guidance regarding the amendments.

This guide includes:

- Introduction to SARP
- Overview of proposed amendments

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Introduction to SARP



Background

- The Commission adopted a Fixed Penalty Policy in July 2013 to resolve violations of five provisions of the Campaign Finance Reform Ordinance (“CFRO”) through an accelerated resolution process according to scheduled or “fixed,” penalties.
- At its meeting on February 12, 2021, the Commission adopted SARP, which is a significantly expanded version of the Fixed Penalty Policy that includes forty-one provisions of law across three articles of the San Francisco Campaign & Governmental Conduct Code (“SF C&GC Code”).

SARP's Objectives

- The objectives of SARP are to incentivize prompt compliance, facilitate efficient case resolution, and promote consistent enforcement outcomes across simple and straightforward matters that are often strict liability provisions of law.
- Ultimately, SARP allows the Enforcement Division to devote resources to the investigation and resolution of cases with more severe violation types while still addressing minor and/or moderate violations of law across nearly all the Commission's program areas.

How SARP Operates

- SARP identifies a specific set of code violations that are generally less complex in nature and present lower levels of public harm.
 - The program provides general and specific eligibility criteria to ensure only simple/straightforward matters are included.
 - The program establishes an engagement timeline that incentivizes respondents to take any required corrective action and timely enter into a settlement agreement.
 - 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.
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SARP Metrics

- Since adoption, 36 percent of total complaints that the Commission received were identified as preliminarily eligible for resolution under SARP.
 - Of the total cases resolved under SARP
 - 19 were resolved via stipulated settlement agreement for \$45,821 in total financial penalties. In contrast, 37 were mainline (33% SARP) for \$417,126 in penalties (10% SARP)
 - 10 Campaign Finance
 - 6 Ethics
 - 3 Lobbyist
 - 92 were resolved through confidential warning letters to respondents
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An aerial photograph of a city skyline, likely San Francisco, featuring numerous skyscrapers and a dense urban layout. A semi-transparent white banner is overlaid across the center of the image, containing the text 'Proposed Amendments'. On the left side, there is a dark blue square containing the white number '02'.

02

Proposed Amendments

Purpose

- Expand coverage by including additional strict liability violations that require minimal investigation.
- Remove obsolete provisions to align with changes to the SF C&GC Code.
- Clarify standards for existing violations to improve consistency.
- Revise penalties to better reflect the level of harm and encourage corrective action by respondents.

Proposed Amendments

- Please see Attachment 1 - Proposed Amendments to SARP (Redlined SARP Policy Documents)
- Please see Table 1 - Overview of Proposed SARP Amendments (Rationale Table)
- Open to discussion and questions from Commissioners

Table 1: Overview of Proposed SARP Amendments

Overview		
No amendment required.		
General Eligibility Guidelines		
No amendment required.		
Fixed Fine Penalties		
No amendment required.		
Warning Letters		
Category	Code Section	Proposed Change
Non-substantive	N/A	Insert at the beginning of the sentence, "In both SARP and the regular enforcement process."
Exclusions		
No amendment required.		
Types of Violations Eligible		
No amendment required.		
SARP Index 1 – Provisions of Law Included within SARP		
Campaign Finance and Reporting Provisions		
Category	Code Section	Proposed Change
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"> Amend to include SF C&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. Rationale: 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.
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"> Amend to include SF C&GCC § 1.106; Gov't Code § 84308. The proposed amendment would include an additional contribution prohibition provision. Rationale: 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.
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"> Amend to include SF C&GCC § 1.106; Gov't Code § 85701.5. The proposed amendment would include an additional contribution disclosure requirement provision. Rationale: 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.
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"> Amend to include SF C&GCC § 1.148(a). The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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.
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> Amend to include SF C&GCC § 1.124. The proposed amendment would include an additional contribution disclosure requirement provision. Rationale: 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.
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> Amend to include SF C&GCC § 1.127. The proposed amendment would include an additional contribution prohibition provision. Rationale: 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.
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> Amend to include SF C&GCC § 1.148(c). The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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.
Non-substantive	#24. Threshold report violation (SF C&GC Code § 1.152)	<ul style="list-style-type: none"> Capitalization: replace “Report” with “report”
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> Amend to include SF C&GCC § 1.163. The proposed amendment would include an additional expenditure disclosure requirement provision. Rationale: 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.
Campaign Consultant Provisions		
Category	Code Section	Proposed Change
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"> Amend to include SF C&GCC § 2.120(a). The proposed amendment would include an additional lobbying activity reporting requirement. Rationale: 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.
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> Amend to include SF C&GCC § 2.120(b). The proposed amendment would include an additional lobbying activity reporting requirement. Rationale: 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.
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"> Replace “Omission of” with “Failure to timely disclose” Rationale: The proposed amendment would clarify the violation type to include late disclosure of required information. Replace “Interest” with “Interests”
Substantive	#41. Failure to timely complete and file Ethics Training Certificate or Sunshine Ordinance	<ul style="list-style-type: none"> Amend to include SF C&GCC §§ 3.102, 3.205. The proposed amendment would include an additional governmental ethics reporting requirement. Rationale: Failure to file the Form 700 is already included as a SARP-eligible violation.

	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"> Amend to include SF C&GCC § 3.1-102.5(c). The proposed amendment would include an additional governmental ethics reporting requirement. Rationale: 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.
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"> Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”. Rationale: The proposed amendment would clarify the violation type to include late disclosure of required information.
Permit Consultant Provisions		
No amendment required.		
Major Developer Provisions		
Category	Code Section	Proposed Change
No amendment required.		
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"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.

Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.
SARP Table 1 – Conduct Specific Provisions Eligible for SARP		
Campaign Finance and Reporting Provisions		
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"> Amend to include SF C&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. Rationale: 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.

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"> Delete "than \$500" and insert "\$500 or" between "is" and "less." The proposed amendment would increase the threshold limit by less than one dollar. Rationale: The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.
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"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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.
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"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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.
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"> 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. Rationale: The proposed amendment simplifies the threshold by rounding up to the nearest whole dollar.
Non-substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> Insert "," within "\$1500"

Substantive	#18. Improper expenditure (SF C&GC Code §§ 1.122(b), 1.148(a))	<ul style="list-style-type: none"> The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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.
Substantive	#19. Business entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> The proposed amendment would include an additional contribution disclosure requirement provision. Rationale: The proposed amendment models the language found within existing campaign contribution prohibition provisions included within SARP, such as those under #13 <i>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 #13 <i>Contributor information</i>. However, the threshold amount was increased here to reflect the higher activity level envisioned under this section.
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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.
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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.
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"> Delete “*” Rationale: The proposed amendment deletes a typographical error.
Substantive	#25. Disclaimer violations (SF C&GC Code §§ 1.161, 1.162)	<ul style="list-style-type: none"> The proposed amendment would delete some of the specific factors for exclusion from SARP. Rationale: 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.
Substantive	#26 Member communication disclosures (SF C&GC Code § 1.163)	<ul style="list-style-type: none"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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>.
Campaign Consultant Provisions		
Category	Code Section	Proposed Change
No amendment required.		
Lobbyist Provisions		
Category	Code Section	Proposed Change
Non-substantive	#30. Lobbyist registration violations (SF C&GC Code § 2.110(a), (b), (d))	<ul style="list-style-type: none"> Capitalization: replace “Registration” with “registration.” Delete “No history of not filing or properly amending registration reports.” Rationale: The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.
Non-substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> Capitalization: replace “Report” with “report”. Delete “No history of not filing monthly reports.” Rationale: The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.
Substantive	#31. Monthly report non-filing (SF C&GC Code § 2.110(c))	<ul style="list-style-type: none"> The proposed amendment would add an additional factor eligible for a Warning Letter. Rationale: The proposed amendment would add a scenario eligible for a Warning Letter

		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"> The proposed amendment would include an additional lobbying activity reporting provision. Rationale: The proposed amendment employs thresholds designed to reflect minimal public harm.
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> The proposed amendment would include an additional lobbying activity reporting provision. Rationale: The proposed amendment employs thresholds designed to reflect minimal public harm.
Non-substantive	#38. Lobbyist recordkeeping (SF C&GC Code § 2.135)	<ul style="list-style-type: none"> Insert “.” after “are considered material.”
Financial Disclosure and Governmental Ethics Reporting		
Category	Code Section	Proposed Change
Non-substantive	Heading Title	<ul style="list-style-type: none"> Insert “Statement of” at the beginning of the sentence. Delete “Disclosure Statements.” Insert “(Form 700)” at the end of the sentence.
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"> Delete “No history of failing to file reports and no significant history of late-filed reports.” Rationale: The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters. Replace “Interest” with “Interests.”
Non-substantive	#40. Failure to timely disclose required information on Statement of Economic Interests	<ul style="list-style-type: none"> Replace “Omission of” with “Failure to timely disclose” Rationale: The proposed amendment would clarify the violation type to include late disclosure of required information. Replace “Interest” with “Interests.”

	(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"> • 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.” • Rationale: The proposed amendment would include clarification to an existing factor for a Warning Letter. • 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.” • Rationale: 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.
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"> • The proposed amendment would include an additional government ethics requirement. • Rationale: 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.
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"> • The proposed amendment would include an additional government ethics prohibition. • Rationale: 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.
Non-substantive	#45. Gift limit (SF C&GC Code § 3.216(b))	<ul style="list-style-type: none"> • Delete, “The respondent does not have a history of accepting unlawful gifts.” • Rationale: The proposed amendment would remove this specific eligibility factor and instead rely upon the general eligibility guidelines for Warning Letters.

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

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"> Replace “60 days” and “90 days” with “45 days” and “60 days”
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"> 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. Rationale: The proposed amendment utilizes the same threshold levels found currently under this SARP entry.
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"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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>.
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"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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>

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"> The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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.
Substantive	#19. Business Entity contribution disclosures (SF C&GC Code § 1.124)	<ul style="list-style-type: none"> The proposed amendment would include an additional contribution disclosure requirement provision. Rationale: 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>.
Substantive	#22. Contribution from parties to land use matters (SF C&GC Code § 1.127)	<ul style="list-style-type: none"> The proposed amendment would include an additional contribution prohibition provision. Rationale: 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>.
Substantive	#23. Prohibited use of unexpended public funds (SF C&GC Code § 1.148(c))	<ul style="list-style-type: none"> The proposed amendment would include an additional expenditure prohibition provision. Rationale: 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>.
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"> The proposed amendment would include an additional contribution prohibition provision. Rationale: The proposed amendment models the language found within an existing campaign reporting requirement provision

		included within SARP, found under #25 <i>Disclaimer violations.</i>
Campaign Consultant Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> Replace “60 days” and “90 days” with “45 days” and “60 days.”
Lobbyist Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> Replace “60 days” and “90 days” with “45 days” and “60 days.”
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"> The proposed amendment would include an additional lobbying activity reporting provision. Rationale: The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under <i>#30 Lobbyist Registration non-filing or failure to update.</i>
Substantive	#37. Appointment of lobbyist employee to City office (SF C&GC Code § 2.120(b))	<ul style="list-style-type: none"> The proposed amendment would include an additional lobbying activity reporting provision. Rationale: The proposed amendment models the penalties found within existing lobbyist reporting requirements included within SARP, such as those under <i>#30 Lobbyist Registration non-filing or failure to update.</i>
Financial Disclosure and Governmental Ethics Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> Replace “60 days” and “90 days” with “45 days” and “60 days.”
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"> • Replace “Omission of” with “Failure to timely disclose” • Rationale: The proposed amendment would clarify the violation type to include late disclosure of required information. • Replace “Interest” with “Interests”
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"> • The proposed amendment includes new penalty amounts. • Rationale: 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.
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"> • The proposed amendment would include required trainings filings. • Rationale: 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>.
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"> • The proposed amendment would include an additional government ethics requirement. • Rationale: 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.
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"> • Replace “Conflict” with “Non or late filing of conflict” and delete “non-filing”. • Rationale: The proposed amendment would clarify the violation type to include late disclosure of required information.

Permit Consultant Provisions		
Category	Code Section	Proposed Change
Substantive	Heading Title	<ul style="list-style-type: none"> Replace “60 days” and “90 days” with “45 days” and “60 days.”
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"> Replace “60 days” and “90 days” with “45 days” and “60 days.”
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"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.
Substantive	#38. Donor Behested Payment report non-filing by officer (SF C&GC Code § 3.620)	<ul style="list-style-type: none"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.
Substantive	#39. Recipient Behested Payment report non-filing by officer (SF C&GC Code § 3.630)	<ul style="list-style-type: none"> The proposed amendment would delete this filing requirement. Rationale: The proposed amendment would align SARP with the changes included in the Proposition E legislation effective July 10, 2022.