

April 9, 2026

San Francisco Ethics Commission
25 Van Ness Ave, STE 220
San Francisco, CA 94102



Re: Agenda Item #5—Support for Ethics and Campaign Finance Reforms

Dear Chair Flórez Feng and Commissioners:

On behalf of California Common Cause, I am writing to express our strong support for the ethics and campaign finance reforms outlined in the [recent staff report](#) regarding the City's ethics and campaign finance rules. These recommendations represent thoughtful, targeted improvements that address clear gaps in the City's current framework and strengthen protections against corruption and undue influence.

Contribution limits are a cornerstone of campaign finance law. They exist to prevent real or perceived corruption and ensure that no single donor can exert disproportionate influence over candidates or elected officials. However, as the report correctly identifies, current law allows candidates to effectively circumvent these limits through the use of candidate-controlled committees that are not subject to contribution caps.

Applying the City's candidate contribution limit to all candidate-controlled committees when a candidate is actively running for City elective office is a necessary and reasonable reform. This change would close a significant loophole that allows unlimited contributions to flow through affiliated committees, undermining the purpose and effectiveness of the City's existing limits.

We also strongly support clarifying that third-party republication of candidate campaign materials constitutes a contribution subject to applicable limits. As the report explains, the current framework allows third parties to amplify candidate messaging using the candidate's own materials without being subject to contribution limits, so long as direct coordination cannot be proven. This gap weakens coordination rules and creates opportunities to evade contribution limits through practices such as republication and "redboxing." Ensuring that such activity is treated as a contribution is critical to maintaining the integrity of the City's campaign finance system.

Finally, we support establishing limits on the use of legal defense funds (LDF) and campaign funds to pay penalties for violations of the Campaign and Governmental Conduct Code. Allowing candidates or officeholders to use committee funds—often raised from interested parties—to pay penalties diminishes accountability and weakens deterrence. Requiring candidates and officeholders to bear at least a portion of these costs personally, especially when they are implicated, is an important step toward reinforcing compliance and ensuring that violations carry meaningful consequences.

Taken together, these reforms represent a balanced and legally grounded approach to strengthening the City's ethics and campaign finance laws. They target specific, well-documented gaps while preserving candidates' ability to participate in the political process and engage in protected speech. Importantly, they also align with established legal principles recognizing the government's compelling interest in preventing corruption and the appearance of corruption.

We commend the Commission and staff for their careful analysis and stakeholder engagement in developing these recommendations. We respectfully urge the Commission to move forward with these reforms and adopt the proposed legislative and regulatory changes.

Thank you for your consideration.

Sincerely,

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