

Patrick Ford
Executive Director

Jeffrey Zumwalt
Acting Director of Enforcement

San Francisco Ethics Commission
25 Van Ness Avenue, Suite 220
San Francisco, CA 94102
(415) 252-3100

BEFORE THE SAN FRANCISCO
ETHICS COMMISSION

In the Matter of)	SFEC Complaint No. 25-972
)	
SHAMANN WALTON,)	
)	
Respondent.)	
)	STIPULATION, DECISION
)	AND ORDER
)	
)	
)	
)	
)	

THE PARTIES STIPULATE AS FOLLOWS:

1. This Stipulation, Decision, and Order (Stipulation) is made and entered into by and between Shamann Walton (Respondent) and the San Francisco Ethics Commission (the Commission).
2. Respondent and the Commission agree to settle and resolve all factual and legal issues in this matter and to reach a final disposition without an administrative hearing. Respondent represents that Respondent has accurately furnished to the Commission all information and documents that are relevant to the conduct described in Exhibit A. Upon approval of this Stipulation and full performance of the terms

outlined in this Stipulation, the Commission will take no future action against Respondent regarding the violations of law described in Exhibit A, and this Stipulation shall constitute the complete resolution of all claims by the Commission against Respondent related to such violations. Respondent understands and knowingly and voluntarily waives all rights to judicial review of this Stipulation and any action taken by the Commission or its staff on this matter.

3. Respondent acknowledges responsibility for and agrees to pay an administrative penalty as set forth in Exhibit A. Respondent agrees that the administrative penalty set forth in Exhibit A is a reasonable administrative penalty.

4. Within ten business days of the Commission’s approval of this Stipulation, Respondent shall either pay the penalty through the City’s online payment portal or otherwise deliver to the following address the sum as set forth in Exhibit A in the form of a check or money order made payable to the “City and County of San Francisco”:

San Francisco Ethics Commission
Attn: Enforcement & Legal Affairs Division
25 Van Ness Avenue, Suite 220
San Francisco, CA 94102

5. If Respondent fails to comply with the terms of this Stipulation, then the Commission may reopen this matter and prosecute Respondent under Section C3.699-13 of the San Francisco Charter for any available relief.

6. Respondent understands, and hereby knowingly and voluntarily waives, any and all procedural rights under Section C3.699-13 of the San Francisco Charter and the Commission’s Enforcement Regulations with respect to this matter. These include, but are not limited to, the right to appear personally at any administrative hearing held in this matter, to be represented by an attorney at

Respondent's expense, to confront and cross-examine all witnesses testifying at the hearing and to subpoena witnesses to testify at the hearing.

7. Respondent understands and acknowledges that this Stipulation is not binding on any other government agency with the authority to enforce the San Francisco Campaign & Governmental Conduct Code section 1.100 *et seq.*, and does not preclude the Commission or its staff from cooperating with or assisting any other government agency in its prosecution of Respondent for any allegations set forth in Exhibit A, or any other matters related to those violations of law set forth in Exhibit A.

8. This Stipulation is subject to the Commission's approval. In the event the Commission declines to approve this Stipulation, the Stipulation shall become null and void, except Paragraph 9, which shall survive.

9. In the event the Commission rejects this Stipulation, and further administrative proceedings before the Commission are necessary, Respondent agrees that the Stipulation and all references to it are inadmissible. Respondent moreover agrees not to challenge, dispute, or object to the participation of any member of the Commission or its staff in any necessary administrative proceeding for reasons stemming from his or her prior consideration of this Stipulation.

10. This Stipulation, along with the attached Exhibit A, reflects the entire agreement between the parties hereto and supersedes any and all prior negotiations, understandings, and agreements with respect to the transactions contemplated herein. This Stipulation may not be amended orally. Any amendment or modification to this Stipulation must be in writing duly executed by all parties and approved by the Commission at a regular or special meeting.

11. This Stipulation shall be construed under, and interpreted in accordance with, the laws of the State of California. If any provision of the Stipulation is found to be unenforceable, the remaining provisions shall remain valid and enforceable.

12. The parties hereto may sign different copies of this Stipulation, which will be deemed to have the same effect as though all parties had signed the same document.

Dated: 05-18-2026 | 16:08:12 PDT

DocuSigned by:
[Redacted Signature]
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PATRICK FORD, EXECUTIVE DIRECTOR
SAN FRANCISCO ETHICS COMMISSION

Dated: 05-18-2026 | 11:18:03 PDT

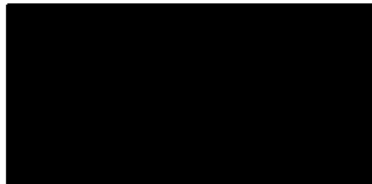
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SHAMANN WALTON
RESPONDENT

DECISION AND ORDER

The foregoing Stipulation of the parties in the matter of "Shamann Walton, SFEC Case No. 25-972," including the attached Exhibit A, is hereby accepted as the final Decision and Order of the San Francisco Ethics Commission, effective upon execution below by the Chairperson.

IT IS SO ORDERED.

Dated: 7/10/20



ARGEMIRA FLOREZ-FENG, CHAIRPERSON
SAN FRANCISCO ETHICS COMMISSION

Exhibit A

I. Introduction

Shamann Walton (“Respondent”) is the District 10 member of the San Francisco Board of Supervisors, having assumed office on January 8, 2019, and serving to the present. As a Board of Supervisors member, Respondent participates in making laws, refers matters to commissions and committees, collaborates with the Mayor’s Office on the City budget, and responds to community needs.

Respondent is also required to disclose on his annual Statement of Economic Interests (“Form 700”) all gifts valued at \$50 or more from a single source. On his 2023 Form 700, Respondent reported receiving a gift of travel from Bay Area Community Resources, Inc. (“BACR”), exceeding the \$590 annual gift limit. Although gifts of travel from nonprofits above the annual limit may be permissible under certain circumstances, the source of such gifts may nonetheless constitute a financial interest. Within one year of receiving the gift of travel from BACR, Respondent voted to approve a grant amendment involving BACR.

Records further indicate that in June 2023, Respondent received a painted portrait valued at \$5,500 from Urban Ed Academy (“Urban Ed”) at an event titled “Black Educators Night Out.” This gift, which exceeded the annual gift limit, was not reported on his 2023 Form 700, in violation of the City’s gift disclosure requirements.

II. Applicable Law

A. Gift Rules

1. Definition

The California Political Reform Act (the “PRA”), as incorporated by the San Francisco Campaign and Governmental Conduct Code (the “C&GC Code”), defines a *gift* as any payment that confers a personal benefit on the recipient, to the extent that consideration of equal or greater value is not received. Cal.

Gov't Code § 82028(a). This definition applies to the state rules regarding the disclosure of gifts and the annual gift limit.

2. Gift Limit

Under California Government Code (the "Government Code") section 89503(a), a public official shall not accept gifts from a single source in a calendar year with a total value exceeding the applicable gift limit. The applicable limit for 2023 was \$590. Cal. Gov't Code § 89503(f) and 2 CCR § 18940.2(a).¹

3. Gift Disclosure

Government Code section 87207(a)(1) requires public officials to disclose all reportable gifts with a value of \$50 or more received from a given source on their Form 700. A "gift" for reporting purposes includes any item that meets the definition set forth in the Government Code section 82028(a) and applicable regulations. Gifts are not considered received if, within 30 days of receipt, they are either returned to the donor or delivered to a nonprofit organization without being claimed as a charitable contribution for tax purposes. *Id.* § 82028(b)(2).

B. Conflicts of Interest

Every public official is prohibited from making or participating in making a governmental decision in which the official knows or has reason to know the official has a financial interest. SF C&GCC § 3.206, incorporating Cal. Gov't Code § 87100. A public official has a financial interest in a governmental decision if it is reasonably foreseeable that the decision will have a material financial effect on the official or any of the official's financial interests.

¹ Applicable gift limits are provided on the Fair Political Practices Commission's website at: https://sfethics.org/wp-content/uploads/2023/01/FPCC_Local_Gift_Fact_Sheet_Final_2023.pdf

1. Financial Interest

A financial interest includes any donor of a gift provided or promised to, or received by the official if the gifts given by the donor to the official are valued at or above a certain amount. Cal. Gov't Code. §§ 87103, 87103(e). As stated above, the applicable limit for 2023 was \$590. Cal. Gov't Code § 89503(f) and 2 CCR § 18940.2(a).

2. Making or Participating in Making a Governmental Decision

A public official "makes" a governmental decision if the official authorizes or directs any action, votes, appoints a person, obligates or commits his or her agency to any course of action, or enters into any contractual agreement on behalf of his or her agency. 2 CCR § 18704(a). A public official "participates in" a governmental decision if the official provides information, an opinion, or a recommendation for the purpose of affecting the decision without significant intervening substantive review. 2 CCR § 18704(b).

3. Reasonably Foreseeable Effect of the Decision

In order for an official to be prohibited from making or participating in making a governmental decision, it must be reasonably foreseeable that the decision will have a financial effect on one of the official's financial interests. Under California law, it is reasonably foreseeable that a government decision will have a financial effect on a person if the person is a named party in, or the subject of, a governmental decision. 2 CCR § 18701(a). A financial interest is the subject of a proceeding if the decision involves the issuance, renewal, approval, denial or revocation of any license, permit, or other entitlement to, or contract with, the financial interest. *Id.*

4. Material Financial Effect of the Decision

In order for an official to be prohibited from making or participating in making a governmental decision, the reasonably foreseeable financial effect the decision will have on the official's financial

interest must be material. Under California law, the reasonably foreseeable financial effect of a governmental decision on a person is considered to be material if the person is a named party in, or the subject of, the decision including a claimant, applicant, respondent, or contracting party. 2 CCR §§ 18702.3(a)(2), 18702.4(a).

III. Material Facts and Analysis

A. Receipt of the Portrait from Urban Ed

On March 11, 2025, the City Controller's Office issued a Public Integrity Assessment reviewing, among other matters, City grants involving Urban Ed. The report found that Urban Ed commissioned and paid \$5,500 to an artist for a painted portrait of Respondent, presented to him at an event titled "Black Educators Night Out" in June 2023. The portrait depicts Respondent personally and was presented at an award ceremony explicitly naming him as the recipient ("District 10 Community Awardee Supervisor Shamann Walton"), indicating that Urban Ed intended to honor him individually rather than the City or the Board of Supervisors. Investigators also identified that Respondent had personally attended prior Urban Ed events, including the "Urban Ed Academy Annual Gala in Support of Black Male Teachers" on November 5, 2022, showing a history of personal engagement with the nonprofit.

On June 8, 2023, Respondent posted on his personal Instagram account photographs of himself posing with the portrait alongside Urban Ed's then-Executive Director and the artist. In the post, Respondent publicly acknowledged receipt of the artwork, stating that he was "extremely humbled to be presented with this stunning work of art" and that it would be displayed in his office at City Hall alongside other works by local artists.

Public reporting further reflects that Respondent later stated to a *San Francisco Chronicle* reporter that he did not consider the portrait to be a "gift" and that it remained displayed in his City Hall office, with reference to its placement among other works by the same artist.

In a subsequent interview with Investigators, Respondent confirmed that the portrait continued to hang in his City Hall office and reiterated that he did not consider it to be a gift, which he stated was the basis for not reporting it on his 2023 Form 700. Respondent further acknowledged that he did not seek advice or guidance at the time of acceptance.

In addition, Investigators reviewed invoices and related records confirming that Urban Ed paid \$5,500 to commission the portrait and that the artist did not retain possession or control following completion and delivery of the portrait. Furthermore, testimony from witnesses with knowledge of the circumstances surrounding the portrait indicated that the portrait was presented at the event in a manner consistent with a ceremonial award to Respondent. The totality of the evidence establishes that the portrait was commissioned for Respondent and transferred to him in connection with his individual recognition at the event, and that Respondent accepted in his individual capacity.

Taken together, the evidence supports that the portrait was intended as a personal gift and was accepted as such by Respondent. Under City rules, the classification of an item as a gift depends on the circumstances of its transfer and the benefit conferred at the time of receipt, not its subsequent display or characterization after receipt. The portrait's later exhibition in Respondent's City office does not alter its original characterization as a personal gift.

Accordingly, the portrait constitutes a gift to Respondent as an individual. Because the value of the portrait exceeded the \$590 annual gift limit, Respondent's acceptance of the gift violated applicable gift restrictions. Cal. Gov't Code § 89503(f) and 2 CCR § 18940.2(a). Additionally, Respondent's failure to disclose the gift on his 2023 Form 700 constitutes a separate reporting violation. Cal. Gov't Code §§ 87207(a)(1) and 82028(b)(2).

B. Participation in BACR Grant Vote

Respondent was prohibited from making, participating in making, or in any way attempting to use his official position to influence a governmental decision in which he knew or had reason to know he had a financial interest. Such conduct constitutes a conflict of interest under state and local law.

(a) Financial Interest

As disclosed on his 2023 Form 700, Respondent reported receiving a gift of travel from BACR, a nonprofit organization that provides youth services, educational programming, job training, and behavioral and mental health services throughout the Bay Area. These gifts created a financial interest in BACR within the meaning of the PRA. Respondent received this gift in the form of travel to Aspen, Colorado, from October 9 to October 11, 2023, valued at \$1,679.30, during which Respondent reported that he “participated in conference conversations around San Francisco’s strategies to achieve equity.”

Because the gift exceeded the applicable reporting threshold and was received within twelve months of October 2023, BACR constituted a source of income to Respondent throughout all times relevant to this matter. Accordingly, during this period, Respondent was prohibited from making or participating in making any governmental decision if it was reasonably foreseeable that the decision would have a material financial effect on BCAR.

(b) Making or Participating in Making Governmental Decisions

As described above, voting on an amendment to a grant agreement constitutes making a governmental decision. On September 3, 2024, within 12 months of receiving the gift, Respondent voted on a resolution approving an amendment to a grant agreement between the Office of Economic and Workforce Development (“OEWD”) and BACR. BACR was to “provide COVID-Response Resource Hub Coordinator services, and continue to establish neighborhood-based points of entry into the public

workforce system, affiliated government agencies, and community-based organizations for information, referral, and delivery of essential workforce services for a two-year period,” pursuant to the original grant agreement dated November 21, 2022 (“Original Grant Agreement”). The September 3, 2024 amendment increased the contract amount by \$4,780,000, for a total amount of \$14,779,999, and extended the term of the agreement through June 30, 2025.

By voting on this amendment, Respondent directly participated in a governmental decision affecting BACR.

(c) Reasonably Foreseeable Effect of the Decision

It was reasonably foreseeable that the governmental decision at issue would have a financial effect on BACR because BACR was directly identified in and benefitted from OEWD’s grant agreement. As the recipient of substantial City funding, BACR was clearly a subject of the decision, and any vote to amend or increase the agreement would foreseeably affect its financial interests.

(d) Material Financial Effect of the Decision

The reasonably foreseeable financial effects of the governmental decision on BACR were material because BACR was directly involved in OEWD’s grant agreements and stood to benefit financially from the Board of Supervisors’ vote. BACR was explicitly identified in the grant agreement, and any amendment increasing the contract amount or extending its term would directly affect the organization’s funding and operations.

By voting on this amendment to the Original Grant Agreement, Respondent made a decision that materially impacted BACR’s financial interests. Because BACR was a central subject of the decision and a recipient of substantial City funding, the reasonably foreseeable financial effects of Respondent’s decision on BCAR were material.

Accordingly, by participating in and voting on the approval of the grant amendment, Respondent violated the conflict of interest provisions set forth in Cal. Gov't Code section 87100 and C&GC Code section 3.206(a).

IV. Violations of Law

Count 1

Acceptance of a gift in excess of the annual gift limit, in violation of Cal. Gov't Code § 89503(f) and 2 CCR § 18940.2(a)

In June 2023, Respondent accepted a painted portrait of himself commissioned and paid for by Urban Ed, valued at approximately \$5,500. The portrait was presented in connection with Respondent's recognition and was intended to honor him personally.

The portrait constitutes a gift under the City's gift rules based on the circumstances of its transfer and the benefit conferred at the time of receipt. Because its value exceeded the \$590 annual gift limit for 2023, Respondent's acceptance violated the Government Code section 89503(f) and 2 CCR section 18940.2(a).

Count 2

Failure to report a gift on Form 700, in violation of Cal. Gov't Code §§ 87207(a)(1) and 82028(b)(2)

As established above, the portrait commissioned and paid for by Urban Ed and presented to Respondent in June 2023 constitutes a reportable gift. The value of the gift of \$5,500 far exceeds the reporting threshold and therefore required disclosure on Respondent's 2023 Form 700.

Because Respondent received a reportable gift in 2023 and failed to disclose it on his Form 700, he violated Cal. Gov't Code sections 87207(a)(1) and 82028(b)(2).

Count 3

Making or participating in making governmental decisions in which Respondent had a financial interest, in violation of SF C&GCC § 3.206(a) and Cal. Gov't Code § 87100

On September 3, 2024, Respondent, in his capacity as a member of the Board of Supervisors, voted to approve the amendment to OEWD's Original Grant Agreement, in which BACR was a party and subject to the agreement.

At the time of this decision, Respondent had a financial interest in BACR. The approval of the grant amendment constituted a governmental decision that had a reasonably foreseeable material financial effect on BACR, as it directly involved the continuation and/or modification of funding under the grant agreement.

By voting to approve the grant amendment, Respondent participated in making a governmental decision. Because that decision had a reasonably foreseeable financial effect on an entity in which Respondent had a financial interest, Respondent's participation in the vote concerning BACR therefore violated the C&GC Code section 3.206(a) and Cal. Gov't Code section 87100.

V. Penalty Assessment

This matter involves three counts for conduct in violation of the C&GC Code. The San Francisco Charter ("SF Charter") authorizes the Ethics Commission to assess a maximum administrative penalty of \$5,000 per violation. SF Charter § C3.699-13(c). Alternatively, the Commission may impose a penalty of "three times the amount which the person failed to report properly or unlawfully contributed, expended, gave or received." SF Charter § C3.699-13(c)(i)(3).

Pursuant to Ethics Commission Enforcement Regulation 9(D), when determining penalties, the Commission considers all relevant circumstances, including: (a) the severity of the violation; (b) the presence or absence of any intention to conceal, deceive, or mislead; (c) whether the violation was

deliberate, negligent, or inadvertent; (d) whether the violation was an isolated incident or part of a pattern; (e) whether the respondent has a prior record of violations; and (f) the degree to which the respondent cooperated with the investigation and demonstrated a willingness to remedy any violations.

The City's gift rules and conflict-of-interest laws are fundamental to maintaining a fair, impartial, and transparent government. Public officials are prohibited from participating in matters in which they have a financial interest, and gift restrictions prevent undue influence or favoritism. Violations of these rules create both the danger and appearance that a public official may misuse their office for personal gain, undermining public trust in City government.

A. Count 1 – Acceptance of a gift in excess of the annual gift limit

In June 2023, Respondent accepted a painted portrait of himself, commissioned and paid for by Urban Ed, with an estimated value of \$5,500. Respondent publicly acknowledged receipt of the portrait in a social media post on June 8, 2023, stating that he was “extremely humbled to be presented with this stunning work of art” and that the portrait would be displayed in his City Hall office. Respondent did not return the portrait to the donor or donate it to a 501(c)(3) nonprofit within 30 days, as permitted by law. He also admitted during an interview that he did not seek advice or guidance regarding the gift at the time of acceptance. Evidence, including invoices showing Urban Ed's payment to the artist and statements from various witnesses, supports that the portrait was intended as a personal recognition of Respondent and was accepted in his individual capacity.

Under the Government Code section 89503(a) and 2 CCR section 18940.2(a), public officials are prohibited from accepting gifts from a single source in a calendar year exceeding the annual gift limit, which was \$590 in 2023. Because the portrait's value of \$5,500 substantially exceeded this limit, Respondent's acceptance constitutes a violation of applicable gift restrictions.

In assessing an appropriate penalty, Staff considered Respondent's prior enforcement history before

Fair Political Practices Commission², in which he accepted tickets to a 49ers football game valued at \$872, exceeding the 2020 annual gift limit in violation of Government Code section 89503, and was assessed a \$600 fine. While that prior matter also involved an impermissible gift, Staff distinguished it from the present case because Respondent did not derive personal financial benefit from the portrait beyond its ceremonial and symbolic value. Staff further noted Respondent's expressed intent that the artwork remain with the City upon the conclusion of his tenure. In light of these factors, and consistent with prior enforcement precedents, Staff recommend an administrative penalty of \$500 in connection with this count.

Count 2 - Failure to report a gift on Form 700

Respondent failed to report the portrait on his 2023 Form 700, in violation of the Government Code sections 87207(a)(1) and 82028(b)(2) and 2 CCR section 18940.2(a). The portrait constitutes a reportable gift under these provisions, and disclosure was required given its value and the nature of the transfer. Respondent acknowledged that he did not disclose the gift because he did not believe it constituted a reportable item and that he did not seek guidance regarding reporting obligations.

Consistent with prior Commission precedents, failure to disclose a reportable gift on Form 700 is treated as a separate violation from the acceptance of the gift itself. Staff recommend an administrative penalty of \$500 in connection with this count. This penalty reflects the importance of accurate and complete disclosure, reinforces compliance with mandatory reporting obligations, and serves to deter future nondisclosure by public officials.

B. Count 3 – Making or participating in making governmental decisions in which Respondent had a financial interest

Respondent violated the Government Code section 87100 and the C&GC Code section 3.206(a) by

² In the Matter of Shamann Walton, FPPC No. 21/622

participating in a governmental decision in which he had a financial interest. On September 3, 2024, Respondent voted on the amendment to OEWD's Original Grant Agreement, which increased BACR's grant by \$4,780,000, for a total amount of \$14,779,999 and extended the grant term through June 30, 2025. BACR was the sole beneficiary of this grant, and the decision directly affected the organization's financial interests. By voting on this amendment, Respondent participated in a decision in which he had a reportable financial interest, arising from a gift of travel received from BACR within the prior 12 months.

Although Respondent indicated at interview that he was not certain whether his vote on the grant amendment constituted a conflict of interest, he had completed Ethics and Sunshine Ordinance training annually since 2019 and was therefore expected to understand and avoid conflicts of interest. At no point did he seek guidance from the Ethics Commission regarding his obligations. While there is no evidence that Respondent deliberately sought to benefit personally, his vote on the governmental decision constitutes a serious violation of conflict-of-interest laws, given the substantial funding involved and the reasonably foreseeable material financial effect on BACR.

In determining an appropriate penalty, Staff considered the clarity and recency of the financial interest, the size and significance of the governmental decision, the official's knowledge of ethical obligations, and the potential harm to public trust. Here, the financial interest was direct and substantial. The governmental decision involved a large grant for which BACR was the sole beneficiary. Respondent had prior ethics training yet did not seek advice or refrain from voting on governmental decision concerning BACR. These factors together indicate a serious breach of conflict-of-interest laws for which Respondent shall be held accountable.

Notwithstanding the foregoing, in mitigation, there is no evidence that Respondent intended to conceal, deceive, or mislead the public regarding his financial interest in BACR. Respondent disclosed receipt of a gift of travel from BACR on his Form 700 for calendar year 2023. There is also no evidence that

Respondent derived any personal financial benefit from participating in the governmental decision at issue in this matter. Additionally, the violation in connection with this count appears to be an isolated incident, and there is no evidence of a repeated pattern of similar conduct.

Consistent with prior Commission precedents for conflict-of-interest violations involving substantial, material financial effects and knowing participation, and taking into account the mitigating factors described above, Staff recommend an administrative penalty of **\$3,500** in connection with this count.

In balancing the above facts and considering the penalty factors, Staff propose, and Respondent agrees to, the following penalty for the above-listed violation of City law:

Count One – Acceptance of a Gift from a Reportable Source Exceeding the Permissible Gift Limit: \$500

Count Two – Failing to Report the Gift from a Reportable Source on Form 700: \$500

Count Three – Conflict of Interest (Board of Supervisors meeting dated September 3, 2024): \$3,500

TOTAL PENALTIES: \$4,500