



San Francisco Ethics Commission

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Date: September 4, 2026
To: Members of the Ethics Commission
From: Bertha Cheung, Director of Enforcement
Re: **AGENDA ITEM 5: Quarterly Enforcement Report**

Summary and Action Requested

This report provides general programmatic updates and data about the cases handled by the Commission's Enforcement Division.

No action is required by the Commission, as this item is for informational purposes only.

Cases Resolved

Fiscal Year 2026

So far in Fiscal Year 2026/2027 (July 1, 2025 – September 4, 2026), the Enforcement Division has completed a total of 147 enforcement matters.

Of the 147 completed matters, nine resulted in settlements and one resulted in a default order approved by the Commission. Collectively, these matters resulted in \$68,311 in penalties.

Cases In Progress

So far in Fiscal Year 2026/2027, 156 enforcement matters have been initiated. Of these, 109 matters originated from complaints received from the public. 36 matters were initiated by the Division based on media reports, observations in public disclosures, independent research, findings from audit reports, and interactions with regulated persons. Ten matters were initiated based on referrals from the Controller's Whistleblower Program, and one matter was initiated based on a referral from the Sunshine Ordinance Task Force.

A total of 36 matters are currently in progress, including 27 matters initiated during Fiscal Year 2026, five matters initiated during Fiscal Year 2025, and four matters initiated during Fiscal Year 2024. Of these matters, 15 are in preliminary review and 21 are open investigations.

Of the four matters initiated during Fiscal Year 2024, three remain under active investigation, and one is pending the assigned Commissioner's order of determination regarding the parties' motion to stay the administrative enforcement proceedings, subject to the limitations proposed by the Enforcement Division.

The current cases in progress are broken down by program area in **Charts 1 and 2** below.



Matters in Preliminary Review

Chart 1 – Matters in Preliminary Review by Program Area: 15

Matters currently in preliminary review by case category

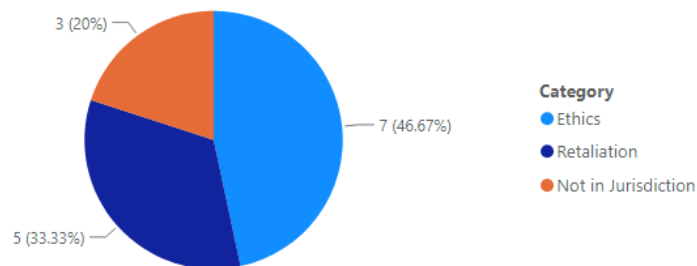
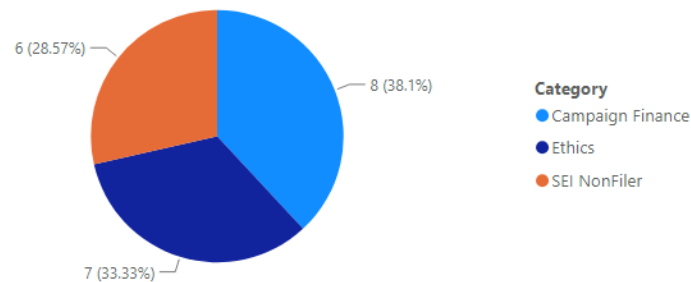


Chart 2 – Open Investigations by Case Category: 21

Current open investigations by case category



Staffing Update within the Enforcement Division

As of August 17, 2026, I assumed the role of Director of Enforcement, succeeding Jeffery Zumwalt, who has served as Acting Director of Enforcement since March 2026. The Enforcement Division thanks Jeff for his hard work and the support he provided to the team during this transition period as he returns to his role as Senior Investigator.

The Division will pursue the FY27 initiatives outlined below to strengthen the operations and processes of the Division. The Division is also in the process of filling the Senior Investigator position formerly held by the Director of Enforcement. Recruitment for that position is currently underway.



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Enforcement Regulations Review Project Update

In late 2024, Staff initiated a comprehensive review of the Enforcement Regulations to identify gaps, clarify ambiguities, and strengthen the framework governing the enforcement process. This effort represented a major undertaking for the Enforcement Division, drawing on extensive internal analysis, stakeholder engagement, Commission consideration, and coordination with the Department of Human Resources' Employee Relations Division ("ERD").

In March and May 2025, Staff held four interested persons meetings and incorporated stakeholder input into the draft amendments. The proposed amendments were presented to the Commission in June and July 2025, after which the Commission identified several areas requiring further refinement. Staff then engaged in approximately ten months of meet-and-confer with MEA and ERD, comprising multiple meetings, written exchanges, and responses to public records requests. Throughout this process, Staff sought to address stakeholder concerns while preserving the Commission's statutory authority and discretion over enforcement matters.

At its regularly scheduled meeting on August 14, 2026, the Commission adopted the amended Enforcement Regulations, marking a significant milestone in the Enforcement Division's efforts to strengthen and modernize its enforcement framework. The adoption represents the culmination of a multi-year effort to provide greater clarity and structure to the enforcement process, address the gaps and ambiguities identified at the outset, and establish a firmer foundation for consistent, transparent, efficient, and fair enforcement.

With adoption complete, bearing any action by the Board of Supervisors, Staff is now entering a substantial implementation phase. This work will include updating internal procedures, forms, templates, and other enforcement materials; developing guidance and training for Staff; communicating the changes to relevant stakeholders; and identifying and implementing any further process changes needed to fully operationalize the amended Regulations. Together, these efforts will ensure that the amendments are effectively embedded in the Division's day-to-day enforcement practices.

FY27 Enforcement Division Priorities and Initiatives

Building on the progress made in FY26, the Enforcement Division will pursue several initiatives in FY27 to strengthen enforcement operations, improve efficiency, and enhance the Division's ability to identify and address potential violations. These priorities build upon the adoption and implementation of the amended Enforcement Regulations and reflect the Division's continued efforts to develop a consistent, proactive, data-informed, and effective enforcement program.

Key FY27 priorities include:

- **Election-season campaign filing review:** Review and standardize the process for reviewing campaign statements and filings during the election season, including protocols for identifying, triaging, referring, and escalating potential violations.



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- **Complaint screening and preliminary review:** Standardize complaint screening, prioritization, assignment, and preliminary review processes, including improvements to complaint intake, case tracking, and the dismissal process.
- **Campaign finance late-fee program:** Develop and implement a coordinated process for identifying, tracking, and addressing campaign finance late fees and potential related enforcement matters.
- **Proactive enforcement:** Strengthen the Division's use of proactive enforcement protocols to identify potential violations independently of individual complaints, including through collaboration with Audit and data-driven investigations.
- **Technology and automation:** Work with EDDA to implement technology-assisted searches, data tools, and workflow improvements, with an emphasis on reducing manual and duplicative work and supporting data-driven enforcement.
- **KPI reporting and performance management:** Strengthen the use of metrics to monitor workload, timeliness, trends, and enforcement outcomes and to inform resource allocation and management decisions.
- **Staff development and Division capability:** Strengthen institutional knowledge through ongoing training, investigator-prosecutor cross-training, and a structured onboarding and development process for the incoming hire.
- **Implementation of amended Enforcement Regulations:** Complete the implementation of the amended Enforcement Regulations through updates to internal procedures and materials, staff training, stakeholder communications, and public-facing resources.

Together, these initiatives will build upon the Division's FY26 accomplishments and strengthen the consistency, efficiency, transparency, and effectiveness of its enforcement work throughout FY27.