



New York City Campaign Finance Board
100 Church Street, 12th Floor, New York, NY 10007
212.409.1800 | www.nyccfb.info

Frederick P. Schaffer
Chair

Gregory T. Camp
Richard J. Davis
Lawrence Moskowitz
Dawn L. Smalls
Members

Paul Seamus Ryan
Executive Director

October 31, 2025

Committee on Rules
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689

Dear Supervisors Walton, Sherrill, and Mandelman,

I write to you regarding the ordinance (File #250868) amending the Campaign and Government Conduct Code, specifically related to expenditure limits. We appreciate the Board of Supervisors' ongoing commitment to ensuring transparent and equitable elections in the City and County of San Francisco.

The New York City Campaign Finance Board (CFB) maintains a robust public financing program designed to amplify the contributions of average New Yorkers and allow candidates of all backgrounds to run competitive campaigns. A cornerstone of this program is the implementation of pre-determined expenditure limits that apply uniformly to all participating candidates for a given office.

While these expenditure limits are not adjusted on a per-candidate basis, the program includes necessary relief for candidates when faced with high raising (including loans and contributions), spending (including obligated spending), or both by non-participant opponents. Per New York City Administrative Code § 3-706(3) and CFB Board Rule § 6-01(k), the expenditure limit for participants is increased to 150% of the original limit if a non-participant receives and/or spends more than half the applicable expenditure limit; the limit is completely lifted if a non-participant receives and/or spends more than 300% of the applicable expenditure limit. Relief is race-specific, meaning candidates who receive relief in the primary are once again subject to the original expenditure limit in the general election unless the criteria for relief are met again. This process is functional and necessary, demonstrated by the fact that the expenditure limit was increased to 150% of the original limit in four different New York City races in 2021 and in three races in 2025. The expenditure limit was completely lifted in two New York City races in 2021 and in one race in 2025.

While participating candidates may petition the CFB for expenditure limit relief, the New York City Administrative Code mandates that the CFB dispense such relief without it being requested, which significantly lessens the administrative burden on candidates. Additionally, consistent expenditure limits (which are adjusted after each general election using the Consumer Price Index) and stable criteria for increasing or lifting such limits allow uniform administration of expenditure limit relief by CFB staff.

The CFB's expenditure limit relief policy incentivizes candidates to participate in the matching funds program (and agree to the program's expenditure limits) by mitigating the disadvantages of competing



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with high spending nonparticipant opponents. We encourage you to consider these core principles of expenditure limit policy at the CFB as you deliberate the ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Ryan', is positioned below the word 'Sincerely,'.

Paul S. Ryan
Executive Director