

File No. 221211

Committee Item No. \_\_\_\_\_

Board Item No. 30

## COMMITTEE/BOARD OF SUPERVISORS

### AGENDA PACKET CONTENTS LIST

Committee: \_\_\_\_\_

Date: \_\_\_\_\_

Board of Supervisors Meeting

Date: December 6, 2022

#### Cmte Board

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/>            | Motion                                       |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Resolution                                   |
| <input type="checkbox"/> | <input type="checkbox"/>            | Ordinance                                    |
| <input type="checkbox"/> | <input type="checkbox"/>            | Legislative Digest                           |
| <input type="checkbox"/> | <input type="checkbox"/>            | Budget and Legislative Analyst Report        |
| <input type="checkbox"/> | <input type="checkbox"/>            | Youth Commission Report                      |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Introduction Form                            |
| <input type="checkbox"/> | <input type="checkbox"/>            | Department/Agency Cover Letter and/or Report |
| <input type="checkbox"/> | <input type="checkbox"/>            | MOU  |
| <input type="checkbox"/> | <input type="checkbox"/>            | Grant Information Form                       |
| <input type="checkbox"/> | <input type="checkbox"/>            | Grant Budget                                 |
| <input type="checkbox"/> | <input type="checkbox"/>            | Subcontract Budget                           |
| <input type="checkbox"/> | <input type="checkbox"/>            | Contract/Agreement                           |
| <input type="checkbox"/> | <input type="checkbox"/>            | Award Letter                                 |
| <input type="checkbox"/> | <input type="checkbox"/>            | Application                                  |
| <input type="checkbox"/> | <input type="checkbox"/>            | Public Correspondence                        |

#### OTHER

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <u>Ethics Commission Letter 110422</u> |
| <input type="checkbox"/> | <input type="checkbox"/>            | _____                                  |
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Prepared by: Arthur Khoo

Date: December 1, 2022

Prepared by: \_\_\_\_\_

Date: \_\_\_\_\_

1 [Ethics Commission Audits Backlog]

2

3 **Resolution urging the Ethics Commission to timely complete backlog of outstanding**  
4 **campaign finance and lobbyists audits.**

5

6 WHEREAS, The Ethics Commission has the duty and responsibility under Charter,  
7 Section C3.699-11(4) to audit campaign statements and other relevant documents to ensure  
8 compliance with applicable state and city campaign finance laws and regulations; and

9 WHEREAS, Under Campaign and Governmental Conduct Code, Section 1.150(a), all  
10 candidate committees whose candidates have received public financing must be audited, and  
11 committees that have not received public financing may be randomly selected for audit at the  
12 discretion of the Executive Director of the Commission; and

13 WHEREAS, Additionally, since 2014, the Ethics Commission has held the duty and  
14 responsibility under Campaign and Governmental Conduct Code, Section 2.135(c), to  
15 undertake audits of one or more lobbyists selected at random on an annual basis and  
16 undertake any other audits or investigations of a lobbyist authorized by law or regulation; and

17 WHEREAS, Campaign finance and lobbyist audits are intended to ensure public  
18 confidence in public financing, a critical program aimed at keeping special interest money out  
19 of local democratic elections, and to protect both taxpayer funds and the integrity of the  
20 elections process; and

21 WHEREAS, The Ethics Commission has a responsibility to disclose any campaign  
22 violations or campaign failures to adhere to campaign finance laws in a timely fashion,  
23 particularly in instances where candidates are applying for public financing in more than one  
24 election cycle; and

25

1           WHEREAS, For the 2016 election cycle, as provided under Sec. 1.150 of the  
2 Campaign & Governmental Conduct Code, the Executive Director of the Ethics Commission  
3 sought and received assistance from the Office of the City Controller's City Services Audit  
4 Division to conduct 12 mandatory campaign finance audits, which audits were all completed in  
5 14 to 16 months following the November 2016 election, as well as for the 2018 election cycle  
6 when the Office of the City Controller's City Services Audit Division assisted in obtaining  
7 external auditing services to complete 14 mandatory campaign finance audits, which audits  
8 were all completed in 23 months following the November 2018 election, demonstrating the  
9 valuable service the Controller's Office can provide if the Ethics Commission is willing to  
10 collaborate; and

11           WHEREAS, On November 3, 2022, the Government Audit and Oversight Committee  
12 had a hearing to receive information from Ethics Commission Executive Director LeeAnn  
13 Pelham regarding the Department's audit status, processes and plans (Board File No.  
14 220139), which revealed that there are 23 open audits of publicly financed electoral  
15 campaigns (including 2 from year 2019, 16 from 2020, and 5 from 2022) that the Ethics  
16 Commission still has not completed as of the date of this Resolution and further revealed that  
17 the Ethics Commission has not completed a single required lobbyist audit since the passage  
18 of Ordinance No. 98-14 over eight years ago; and

19           WHEREAS, Prior to November 3, 2022, Ethics Commission Director LeeAnn Pelham  
20 failed to produce any written documentation setting forth the Department's audit plans or audit  
21 status and although produced documentation with a brief overview and milestones  
22 subsequent to the hearing in the form of a memorandum dated November 4, 2022, on file with  
23 the Clerk of the Board of Supervisors in File No. 220139, which is hereby declared to be a  
24 part of this Resolution as if set forth fully herein, it is still incompatible without any substantive  
25

1 documentation of how the Ethics Commission will fulfill its Charter mandate in a timely and  
2 complete fashion; and

3 WHEREAS, The Ethics Commission has failed to regularly produce and adhere to  
4 audit plans and schedules, and since the 2018 election cycle has not completed a single  
5 mandatory campaign audit nor required lobbyist audits with a backlog that continues to  
6 increase with targeted completion dates of as long as 39 months from the November 2020  
7 election, more than twice as long as the completion time frames for the 2016 election audits;  
8 and

9 WHEREAS, Auditing is a legally required core function of the Ethics Commission and  
10 implementing clear and standardized approaches and procedures is critical for any ongoing  
11 legally required audit program; and

12 WHEREAS, The Board of Supervisors appropriated approximately \$7.4 million to the  
13 Ethics Commission for over 30 full time positions, including 20 analysts for Fiscal Year 2023,  
14 with sufficient funds for external services and support services of other City departments; now,  
15 therefore, be it

16 RESOLVED, That the Board of Supervisors of the City and County of San Francisco  
17 strongly urges the Ethics Commission to (1) create the core components of a long term,  
18 sustainable, and timely auditing function with ongoing audit plans to be reviewed by the Ethics  
19 Commission and promptly implemented; and (2) immediately seek and obtain external  
20 auditing services or auditing services from the City Controller to substantially shorten the  
21 projected time frames for the outstanding audit backlog for mandatory campaign and lobbyist  
22 audits; and, be it

23 FURTHER RESOLVED, That the Board of Supervisors directs the Clerk of the Board  
24 of Supervisors to transmit this Resolution to all member of the Ethics Commission, Executive  
25 Director Pelham and the Mayor.



# San Francisco Ethics Commission

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San Francisco, CA 94102-6053  
ethics.commission@sfgov.org  
415-252-3100 | sfethics.org

November 4, 2022

To: The Honorable Dean Preston, Chair, Government Audit & Oversight Committee  
Supervisor Rafael Mandelman, Committee Member  
Supervisor Connie Chan, Committee Member

From: LeeAnn Pelham, Ethics Commission Executive Director

Re: **Overview of Ethics Commission Audit Program**

Thank you again for the invitation this week to brief the Government Audit & Oversight Committee at its November 3<sup>rd</sup> meeting on the Ethics Commission's audit program and the current status of audits underway and those planned to be performed under the Commission's audit authority. This transmittal provides a written report of information provided verbally at yesterday's hearing, as discussed under Agenda Item 1 ([BOS File #220139](#)).

We welcome the opportunity to provide this detailed information to the Board. As always, we also look forward to continuing to engage with the Board to support policy and budgetary approaches that will continue to advance the effectiveness of the Commission's independent oversight of campaigns, governmental ethics, and lobbying activities in the City.

Please feel free to contact me or Audit and Compliance Review Manager Linda Fong with any questions about this report at [leeann.pelham@sfgov.org](mailto:leeann.pelham@sfgov.org) or [linda.fong1@sfgov.org](mailto:linda.fong1@sfgov.org).

cc: Supervisor Aaron Peskin  
Ben Rosenfield, Controller  
Angela Calvillo, Clerk of the Board of Supervisors  
Stephanie Cabrera, Government Audit & Oversight Committee Clerk  
Members of the Ethics Commission  
Linda Fong, Ethics Commission Audit and Compliance Review Manager  
Michael Canning, Ethics Commission Acting Senior Policy Analyst

## Overview of Ethics Commission Audit Program

### What is the Ethics Commission's audit authority?

**Campaigns.** The San Francisco Ethics Commission has the duty and responsibility under San Francisco Charter Section C3.699-11(4) to audit campaign statements and other relevant documents to ensure compliance with applicable state and city campaign finance laws and regulations. Under San Francisco Campaign and Governmental Conduct Code Section 1.150(a), all candidate committees whose candidates have received public financing must be audited and committees that have not received public financing may be randomly selected for audit at the discretion of the Executive Director of the Commission.

**Lobbying.** Under SFC&GCC Section 2.135(c), the Executive Director of the Commission shall initiate audits of one or more lobbyists selected at random on an annual basis and undertake any other audits or investigations of a lobbyist authorized by law or regulation.

### What audits are required to be performed?

The Commission must conduct mandatory campaign audits of candidate committees whose candidates have received public financing in any election cycle. In addition, the Commission must conduct audit(s) of one or more lobbyists selected at random on an annual basis. Written campaign audit reports issued by the Ethics Commission are available on the [Campaign Audits page](#) on its website at sfethics.org. Once completed, lobbying audits issued by the Commission will be posted on the [Lobbyist compliance](#) web page.

### What are the duties of the Ethics Commission Audit Division and how is it currently staffed?

The Ethics Commission's Audit Division performs a range of required oversight functions. It has responsibility to plan and implement the Commission's mandatory and discretionary campaign audits, and its mandatory lobbying audits. In addition, the Audit Division has responsibility for developing and implementing the post-filing compliance review program for electronically filed Statements of Economic Interests (Form 700) that was recommended in the Controller's June 2020 Public Integrity Review. During election years, the Audit Division also performs reviews of candidate eligibility and public funds disbursements as part of the City's limited public financing program for qualified Supervisorial and Mayoral candidates.

The Audit Division is currently staffed with one Audit and Compliance Review Manager (a Principal Administrative Analyst, or 1824 in the city's job classification system) and three Auditors (Administrative Analysts, or 1822s). The Commission sought an additional position authority for a Senior Auditor (Senior Administrative Analyst, or 1823) in its FY23 budget, however that request was not included in the budget proposal sent by the Mayor to the Board of Supervisors for adoption.

## Has the Ethics Commission leveraged other resources to help conduct its audits?

Yes. With regard campaign audits, Sec. 1.150 of the SF Campaign & Governmental Conduct Code provides that “[a]t the request of the Executive Director, the Controller shall assist in conducting these audits.” In close, regular collaboration with the Controller’s Office, the Commission has taken full advantage of auditing resources that have been available over time with support from that office.

In the past, for example, this has included direct management by the Controller’s City Services Audit Division of an external auditing contract with the Controller’s Office to perform 12 mandatory campaign audits for the 2016 election. For the 2018 election cycle, the Controller’s Office assisted the Commission in securing its own Agreement for external auditing services using an existing vendor list on contract with the Controller’s Office to perform 14 audits of publicly financed candidates.

To help promote timely completion of mandatory audits given existing Ethics Commission resources while also allowing for the completion of other competing Audit Division priorities, the Commission requested and received funds in its FY23 budget to secure assistance of the Office of Contract Administration (OCA) to establish its own external auditing contract. This will enable the Commission to more routinely engage external auditing services over multiple years. Ethics Commission staff and OCA staff are currently working on this process.

At the same time, while the Commission works to establish its own contract for external audits, the Commission also will be using a list of pre-qualified external audit firms that are on a re-established list of vendors on contract with the Controller’s Office. This will enable the Commission to secure external resources in the near term to assist with pending audits from the 2020 election cycle.

## How does the Commission select and prioritize its campaign audits, and where are these processes publicly reported?

As a matter of practice, the Ethics Commission regularly issues [public reports on its audit selection process](#). For example, background on the process to determine audits for the [2019 election](#) and for the [2020 election](#) can be found on the Commission’s website.

## What audits are currently being conducted by the Commission?

As detailed in Attachment I, the Ethics Commission currently has 10 audits in progress: two are mandatory audits of publicly financed candidates from the 2019 election; two are mandatory audits of publicly financed candidates from the 2020 election; and six are audits of lobbyists who were active in calendar year 2021.

## What other audits are pending initiation by the Ethics Commission?

As detailed in Attachment I, in addition to the 10 audits underway, 14 other audits are pending at this time. Each of these is a mandatory audit required to be conducted of a candidate who received public financing in connection with their campaign for the Board of Supervisors in the 2020 election.

As explained on the [2020 audit selection page](#), audits of publicly financed candidates from this election have been prioritized for audit starting with the highest total public financing dollars received by a committee. Attachment I details the list of 2020 mandatory audits and the order in which they will be conducted based on this prioritization criteria.

Commission staff have targeted initiating these 14 pending 2020 mandatory audits following the anticipated completion of two mandatory audits from the 2019 election and the anticipated completion of the six lobbying audits that are nearing completion, by December 31, 2022.

## What is the Commission's plan to complete its pending audits timely?

The first step undertaken by the Commission to ensure quality and timely audits that are thorough, consistent, and objective has been to implement essential audit program process improvements. This work was able to be prioritized with the April 2021 hiring of a position dedicated to serve as audit manager for the division. Process improvements undertaken included program improvement measures addressed in findings and recommendations of the Board of Supervisors' August 2020 Budget and Legislative Analyst (BLA) *Performance Audit of the Ethics Commission*. That audit identified the need for the development of standardized campaign audit processes and procedures, including the documentation of work performed and reporting of audit results, and ongoing staff training. Implementing clear and standardized approaches and procedures is critical for any audit program. The Division's work to implement improved procedures has been a necessary prerequisite to maximizing and sustaining the efficiency, timeliness, and effectiveness of audits over time.

As indicated above, additional steps underway include leveraging external auditing resources on a regular basis. This is being pursued both through external auditing firms tapped through the Controller's Office vendor lists in the near-term in early 2023, and through development of an Ethics Commission departmental contract to provide for continuity of supplemental auditing resources over the longer term.

Further, given the breadth of Commission mandates that are the direct responsibility of the Audit Division, the Division continues to require rightsizing to meet the demands those mandates create. The Commission requested a Senior Auditor position authority in its FY23 budget request. While that position was denied in the Mayor's FY23 budget, the need continues to exist. The Commission will likely continue to seek this position as part of its FY24 budget request.



## Can a candidate close their campaign committee before they are audited? If so, how do they pay for audit-related costs?

There is no law or regulation that prohibits a candidate from terminating their committee and campaign account after the election and before their committee audit is completed. The decision about whether and when to leave open a committee and committee account, or terminate them, is a decision candidates and their treasurers/counsel make based on a variety of factors. By way of illustration, for the 2020 election, at least 8 of the 16 publicly financed candidates have to date already chosen to close their campaign committee and committee accounts. Two of the 16 publicly financed candidates from the 2020 election elected to make payments to their campaign treasurers shortly after the 2020 election, forfeited their remaining public funds to the Ethics Commission, zeroed out their campaign accounts, and terminated their committees shortly thereafter. These instances illustrate options candidates have taken under the law, for example, to assess anticipated final costs, analyze and remit required forfeitures, and evaluate and settle remaining fees to be paid for services of their treasurer and compliance counsel in ways that allow them to terminate their committees and accounts.

## What laws and regulations govern the use of campaign funds after an election? Are public funds received treated differently than contributor funds received?

When candidate committees have funds remaining in their campaign contribution trust account (“CCTA”) after an election, SFC&GCC Sections 1.104, 1.108(b), 1.122(b)(4), and 1.148(c), and San Francisco Regulation 1.148-1 govern the use of the remaining funds. These provisions appear for general reference in Attachment II.

In short, a candidate who receives public financing and whose committee has unexpended public funds must return (“forfeit”) those funds to the City and County of San Francisco no later than 30 days after the Ethics Commission completes its audit of the candidate's committee. Unexpended funds may be used to pay for expenses associated with an audit such as bank fees, treasurer fees, and storage fees until the Ethics Commission completes its audit of the candidate's committee. If the committee has surplus funds (i.e., non-unexpended public funds), the candidate may return funds to contributors, donate funds to charitable organizations or the City and County of San Francisco, pay outstanding campaign debts or accrued expenses, pay expenses associated with terminating the committee, or use the funds for other permissible purposes.

A candidate/elected official may not establish nor control any other committees or accounts for the purpose of making officeholder expenses (i.e., candidate may not open a secondary “officeholder” committee/account). However, they could maintain their existing campaign committee and account, continue to fundraise post-election, and use those funds to cover expenses directly connected with carrying out the candidate’s usual and necessary duties of holding office. Funds raised more than 30 days after an election are not considered unexpended public funds.

## Attachment I In-Progress & Planned Audits

NOTE:

\*\* indicates audit planned assuming availability of planned external audit assistance

<b>2019 Campaign Audits Underway Mandatory</b>	<b>When Started</b>	<b>Targeted Completion Date</b>
Brown, Vallie	Started Sept. 2021 Testing Underway	Dec 31, 2022
Preston, Dean	Started Sept. 2021 Testing Underway	Dec 31, 2022

<b>Annual Audits Underway of Lobbyists Active in CY2021 Mandatory</b>	<b>When Started</b>	<b>Targeted Completion Date</b>
Bracket-Thompson, Bivett	Started Feb. 2022 Testing Wrap up	Dec 31, 2022
CA Hotel & Lodging Association	Started Feb. 2022 Testing Wrap up	Dec 31, 2022
Miller, Martha	Started Feb. 2022 Testing Wrap up	Dec 31, 2022
Reyes, Rudolph	Started Feb. 2022 Testing Wrap up	Dec 31, 2022
Sarjapur, Melinda A.	Started Feb. 2022 Testing Wrap up	Dec 31, 2022
Shannon, Carl	Started Feb. 2022 Testing Wrap up	Dec 31, 2022

<b>2020 Campaign Audits Initiated Mandatory</b>	<b>When Started (Planned)</b>	<b>Targeted Completion Date</b>
Brown, Vallie	Started March 2022 Testing Initiated	April 30, 2023
Melgar, Myrna	Started March 2022 Testing Initiated	April 30, 2023
Engardio, Joel	Committee documents received; audit ready to commence	June 30, 2023
Nguyen, Vilaska	Committee documents received; audit ready to commence	June 30, 2023
Philhour, Marjan	Committee documents received; audit ready to commence	June 30, 2023
Preston, Dean	Committee documents received; audit ready to commence	June 30, 2023

<b>2020 Campaign Audits Planned Mandatory</b>	<b>Target Start</b>	<b>Targeted Completion Date</b>
Avalos, John	April 2023**	Jan 31, 2024**
Chan, Connie	April 2023**	Jan 31, 2024**
Lee, David E.	April 2023**	Jan 31, 2024**
Murase, Emily	April 2023**	Jan 31, 2024**
Sauter, Danny	April 2023**	Jan 31, 2024**
Martin-Pinto, Stephen W.	April 2023**	Jan 31, 2024**
Matranga, Ben	April 2023**	Jan 31, 2024**
Peskin, Aaron	April 2023**	Jan 31, 2024**
Safai, Ahsha	April 2023**	Jan 31, 2024**
Shinzato, Veronica	April 2023**	Jan 31, 2024**

<b>Planned 2022 Campaign Audits Mandatory</b>	<b>Target Start</b>	<b>Targeted Completion Date</b>
Dorsey, Matt	Feb 1, 2024**	Dec 31, 2024**
Engardio, Joel	Feb 1, 2024**	Dec 31, 2024**
Mahogany, Honey	Feb 1, 2024**	Dec 31, 2024**
Mandelman, Rafael	Feb 1, 2024**	Dec 31, 2024**
Mar, Gordon	Feb 1, 2024**	Dec 31, 2024**

<b>Planned Annual Audits Of Lobbyists Active in CY2022 Mandatory</b>	<b>Target Started</b>	<b>Targeted Completion Date</b>
TBD	July 2023	Dec 31, 2024

## Attachment II City Law References Cited

### SFC&GCC Sections 1.104, 1.108(b), 1.122(b)(4), and 1.148(c), and San Francisco Regulation 1.148-1

Per **SFC&GCC 1.104**, "**Unexpended public funds**" shall mean all funds remaining in the candidate committee's account on the 30th day after the candidate controlling the committee is either elected or not elected to office, regardless of the source of the funds, but shall not exceed the amount of public funds provided to the candidate. Funds raised after this date are not unexpended funds." "**Qualified campaign expenditure**" shall not include filing fees, expenses incurred in connection with an administrative or judicial proceeding, payments for administrative, civil or criminal fines, including late filing fees, costs incurred after the election that do not directly affect the outcome of the election, including but not limited to utility bills, expenses associated with an audit, and expenses related to preparing post-election campaign finance disclosure reports as required by the California Political Reform Act, California Government Code Section 81000, et seq., and the provisions of this Chapter, or for inaugural activities or officeholder expenses."

Per **SFC&GCC 1.108(b)**, "All funds, services, or in-kind contributions received by a candidate committee for expenses incurred directly in connection with carrying out the candidate's usual and necessary duties of holding office shall be deposited, credited, or otherwise reported to the candidate committee's Campaign Contribution Trust Account. Such contributions shall be subject to the contribution limits in Section 1.114 of this Chapter 1. An elected officeholder may not establish or control any other committees or accounts for the purpose of making officeholder expenses. Nothing in this Section 1.108 shall prohibit an officer from spending personal funds on official activities."

Per **SFC&GCC 1.122(b)(4)**, surplus funds held by a candidate or committee shall be:

- (A) returned on a "last in, first out" basis to those persons who have made said contributions;
- (B) donated to a charitable organization;
- (C) donated to the City and County of San Francisco;
- (D) used to pay outstanding campaign debts or accrued expenses;
- (E) used to pay expenses associated with terminating the committee, such as bookkeeping, legal fees, preparation of campaign statements, and audits; or
- (F) used for other permissible purposes established by the Ethics Commission by regulation.

Per **SFC&GCC Sec 1.148(c)**, "Any candidate who receives public financing and whose committee has unexpended public funds shall pay to the City and County of San Francisco and deliver to the Ethics Commission those funds for deposit in the Election Campaign Fund no later than 30 days after the Ethics Commission completes its audit of the candidate's committee. Unexpended funds may be used to pay

for expenses associated with an audit such as bank fees, treasurer fees and storage fees until the Ethics Commission completes its audit of the candidate's committee.”

Per **San Francisco Regulation 1.148-1**, “Candidates who receive public funds may only use such funds to pay for qualified campaign expenditures, as defined in section 1.104, except that such candidates may use public funds to pay for a limited range of expenses incurred after the election that do not directly affect the outcome of the election. This limited range of post-election expenses includes any pro-rata costs of post-election rent and utility bills that accrue until the campaign office is closed or 30 days after the election, whichever is sooner; expenses associated with the Ethics Commission’s audit of the campaign committee; and expenses related to preparing and filing post-election campaign finance disclosure reports as required by the California Political Reform Act and the San Francisco Campaign Finance Reform Ordinance.”

# Introduction Form

By a Member of the Board of Supervisors or Mayor

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO

2022 NOV 29 PM 4:44  
Date stamp  
or meeting date

BY JA

I hereby submit the following item for introduction (select only one):

- 1. For reference to Committee. (An Ordinance, Resolution, Motion or Charter Amendment).
- 2. Request for next printed agenda Without Reference to Committee.
- 3. Request for hearing on a subject matter at Committee.
- 4. Request for letter beginning : "Supervisor [ ] inquiries"
- 5. City Attorney Request.
- 6. Call File No. [ ] from Committee.
- 7. Budget Analyst request (attached written motion).
- 8. Substitute Legislation File No. [ ]
- 9. Reactivate File No. [ ]
- 10. Topic submitted for Mayoral Appearance before the BOS on [ ]

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

- Small Business Commission
- Youth Commission
- Ethics Commission
- Planning Commission
- Building Inspection Commission

**Note: For the Imperative Agenda (a resolution not on the printed agenda), use the Imperative Form.**

Sponsor(s):

Supervisor Peskin, PRESTON, CHAN, MANDLEMAN, RONEN, SAFAI

Subject:

[Resolution - Ethics Commission Audits Backlog]

The text is listed:

Resolution Urging the Ethics Commission to Timely Complete Backlog of Outstanding Campaign Finance and Lobbyist Audits.

Signature of Sponsoring Supervisor: [Signature]

For Clerk's Use Only