October 30, 2025

Hon. Shamann Walton, Chair
Hon. Rafael Mandelman, Member
Hon. Stephen Sherrill, Member
San Francisco Board of Supervisors Rules Committee
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: File No. 250867, Campaign and Governmental Conduct Code - Campaign Consultants, Recusal Notifications, Major Developer Disclosures — **Strongly Oppose Unless Amended**

Dear Chair Walton and Members of the Rules Committee,

The undersigned organizations write to respectfully oppose File No. 250867, which would dramatically weaken San Francisco's longstanding disclosure requirements for campaign consultants, members of City boards and commissions, and developers of large projects.

1) OPPOSE UNLESS AMENDED: Repealing Campaign Consultant Disclosures

This language proposes repealing current disclosure rules that require campaign consultants to list all their clients, employees, donors of $100 or more for whom they acted as intermediaries, and gifts made by the consultant to local officeholders totaling $50 or more.

The findings in current Section 1.500 — part of the section that File No. 250867 proposes to repeal — explain clearly why this transparency is essential:

> *"(a) The City and County of San Francisco has a paramount interest in protecting the integrity and credibility of its electoral and government institutions. Election campaigns are highly competitive in San Francisco, and candidates frequently contract for the services of professional campaign consultants who specialize in guiding and managing campaigns.*
>
> *(b) It is the purpose and intent of the people of the City and County of San Francisco in enacting this Chapter to impose reasonable registration and disclosure requirements on campaign consultants. Required registration and disclosure of information by campaign consultants will assist the public in making informed decisions, and protect public confidence in the electoral and governmental processes."*

We hope you still agree with these principles. The influence of campaign consultants in San Francisco politics has not diminished since these requirements were enacted.

Requiring consultants to disclose their clients and employees is vital for transparency . Journalists and the public can better understand political dynamics by seeing which consultants are aligned with which candidates. Repealing these requirements would make it far more difficult, if not impossible, for the public to find this information. Similarly, the public should continue to know when campaign consultants give gifts to local officeholders.

Possible Compromise: The one part of current disclosure rules that seems burdensome without providing significant public value is the requirement that consultants list each political contribution of $100 or more they made or delivered on behalf of clients, or the cumulative total of such contributions (Sec. 1.515 (a)(8)–(9)). Because candidates already report all contributions, we would not oppose removing these provisions.

2) OPPOSE: Repealing Recusal Disclosures

The proposal to repeal the requirement that members of City boards and commissions file a notice with the Ethics Commission after recusing themselves due to a financial conflict of interest also undermines transparency.

The public and journalists should not have to comb through hours of meeting videos to determine when, how often, and why commissioners recuse themselves. These notices are not burdensome to file, and they provide an important safeguard for accountability.

3) STRONGLY OPPOSE: Repealing Developer Disclosures

Removing longstanding requirements that developers of major projects register with the Ethics Commission and report which nonprofits they donated $5,000 or more to — and that then advocated for the developer's projects — represents a deeply misguided change. If adopted, the change would dismantle existing transparency safeguards and erode public trust.

The findings in current Section 3.500 — part of another section that File No. 250867 proposes to repeal — explain clearly why these current law disclosures are essential:

> *"The Board of Supervisors finds that public disclosure of the donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects is essential to protect public confidence in the fairness and impartiality of City and County land use decisions.*
>
> *The Board further finds that disclosure is essential to allow the public to fully and fairly evaluate the City and County's land use decisions. It is the purpose and intent of this Chapter to impose reasonable disclosure requirements on developers to provide the public with information about these donations."*

We hope you still agree with those findings. Eliminating these requirements would erode public trust and make it nearly impossible to track when developers are funding nonprofits that advocate for their projects. The replacement language in File No. 250867 is wholly inadequate.

First, unlike existing law, the proposed language only applies when the developer of a major project or its affiliates *"... has paid or donated to a nonprofit organization in exchange for lobbyist services, as defined in Section 2.105 of this Code."* Even then, the developer would only have to provide information to the nonprofit that *"they would need to register and report such lobbyist services…"*

Second, this creates an obvious loophole. A developer or nonprofit could easily claim that donations were not "payments" for "lobbyist services," but rather just donations to a good cause, with the nonprofit independently deciding to weigh in on the project.

Third, and most troubling, the replacement language eliminates any requirement that developers disclose the amounts or recipients of such donations. Without that information, neither the public nor the Ethics Commission could ever know if — or how much — a developer gave to a nonprofit that advocated on their behalf if the nonprofit didn't declare it as a payment for lobbying.

Rolling Back Disclosure Would Shatter Public Trust

At its core, San Francisco's campaign finance and disclosure laws exist to ensure that voters, journalists, and city officials can see who is influencing decisions. Transparency is not a bureaucratic burden — it is the foundation of public confidence in government.

Repealing these requirements risks fueling cynicism and undermining trust at a time when confidence in institutions is already fragile. The public deserves to know who is advising candidates and when conflicts of interest arise — especially when it comes to campaign consultants, City board members, and developers of major projects.

For these reasons, we respectfully request that the Board of Supervisors reject File No. 250867 as written. We would, however, welcome the opportunity to work with the Board and the Ethics Commission to identify limited adjustments to campaign consultant disclosure rules that reduce unnecessary parts of the current disclosure requirements while preserving the transparency that San Franciscans expect and deserve.

The choice before you is simple: preserve transparency and public confidence — or weaken both and erode trust in City government.

Sincerely,

California Clean Money Campaign
California Common Cause
Indivisible San Francisco
League of Women Voters of California