



# Ethics Commission

**ANNUAL REPORT  
2025**

# MISSION STATEMENT

*To preserve public confidence in City government through education, advice, and the prompt and fair enforcement of local governmental ethics laws.*

## DUTIES AND RESPONSIBILITIES

The City of San Diego Ethics Commission is responsible for monitoring, administering, and enforcing the City's governmental ethics laws; conducting audits and investigations; providing formal and informal advice to persons within the Commission's jurisdiction; conducting training sessions for the regulated community; and proposing governmental ethics law reforms.

Governmental ethics laws include the Ethics Ordinance, the Election Campaign Control Ordinance, and the Municipal Lobbying Ordinance. The Commission accepts complaints regarding alleged violations of laws within its jurisdiction and protects individuals from retaliation for reporting violations. The Commission may impose fines up to \$15,000 for each violation of local governmental ethics laws.

Those who fall within the jurisdiction of the Ethics Commission include:

Category	Groups
Elected Officials	The Mayor, Councilmembers, City Attorney, and their staff
City Employees	Unclassified employees of City departments and entities who file Statements of Economic Interests (Forms 700 or SEIs)
Campaigns	City candidates, political committees, and campaign treasurers
City Boards	Members of City boards and commissions who file SEIs
City Consultants	Consultants who file SEIs
Lobbyists	Lobbying Firms, Organization Lobbyists, and Expenditure Lobbyists

The Commission is an independent City department that does not report to the Mayor or City Council. The Executive Director reports directly to the Commission, which is composed of seven members. The Mayor appoints Commissioners to four-year terms; the City Council confirms appointments.

The Commission's staff of five reports to the Executive Director. Christina Cameron, a Partner of Devaney Pate Morris & Cameron, serves as the Commission's legal counsel.

## **COMMISSIONERS**

### **Chair**

Paul Cooper

### **Vice Chair**

Jimmie Slack

### **Commissioners**

Hon. Laura W. Halgren

James Hauser

Tom Lincoln

Caridad Sanchez

Deval Zaveri

## **STAFF**

Bryn Kirvin, Executive Director

Rosalba Gomez, Audit Program Manager

Kristina Gagné, Investigative Program Manager

Victoria Velasquez, Administration & Training Compliance Program Manager

Ryan O'Connor, Education Program Manager

Megan Curran, Legislative Program Manager

## **GENERAL COUNSEL**

Christina Cameron

Devaney Pate Morris & Cameron LLP

## 2025 HIGHLIGHTS

On November 5, 2024, Measure D was submitted to the voters of the City of San Diego and passed with 72.32% voting in favor. The measure replaced City Charter section 41(d) with Charter section 41.3, increasing the Commission's independence and ensuring sufficient funding. In response, the Commission spent most of 2025 carefully reviewing its founding and enforcement ordinance, SDMC 26.0401 *et seq.* The Commission developed amendment proposals outlined to ensure that the ordinance reflects the language and concepts set forth in Charter section 41.3 and the Commission's operations. After the City Attorney's review and input, it is hoped that the proposed amendments will be presented to City Council sometime in 2026.

In September 2025, the Commission imposed a \$5,000 fine as part of a settlement with Jesús Cárdenas, who engaged in lobbying as a City official after accepting money from a lobbyist representing a cannabis business in 2022. The governmental ethics law at issue in the Cárdenas matter is intended to prevent undue influence on municipal decision-making and to promote transparency. The fine in that case represents the maximum penalty per violation that the San Diego Ethics Commission could impose. Since Cárdenas's violation, the Municipal Code has been amended to increase monetary fines to \$15,000 per violation.

2025 also marked a leadership transition following the retirement of former Executive Director Sharon Spivak, a respected leader whose service strengthened the Commission and advanced its mission. Staff ensured uninterrupted service while the new Executive Director, Bryn Kirvin, began building on the Commission's strong institutional foundation. Staff also graciously helped train Ms. Kirvin in their respective areas of expertise. One of Ms. Kirvin's initiatives in 2025 was to seek funding and begin vetting vendors for a case management system to modernize the Commission's operations.

## AUDIT PROGRAM

San Diego Municipal Code section 26.0414 mandates that the Commission audit campaign committee disclosure statements and other relevant documents to ensure that campaign committees comply with State and local campaign laws. These audits are an essential function of the Commission, serving as a check on campaign activity. Violations discovered through an audit may proceed to enforcement and are not considered complete until the enforcement process is complete. The Audit Program Manager, Rosalba Gomez, conducts all committee audits.

### ***Audit Selection Process***

Campaign committees are audited depending upon the total amount of all contributions (monetary and non-monetary) and loans the committee received. A random drawing to determine what committees are audited is held in September of the odd-numbered year following a general election. Committees are automatically audited if their financial activity exceeds \$100,000. Committees with lower levels of financial activity are subject

to a random drawing, which selects a percentage of additional committees for audit (see below).

Financial Activity	Percentage of Committees Subject to Audit
\$100,000 +	100%
\$50,000 - \$99,999	75%
\$15,000 - \$49,999	25%

Campaign committees are required to keep documents for four years in anticipation of a Commission audit. Failure to do so is a violation of the law in and of itself. Both candidate committees and ballot measure committees may be audited. Final Audit Reports are posted on the Commission’s website after the Commission accepts them at a public meeting.

**2025 Audits**

In 2025, the Audit Program Manager completed the following audits:

2022 Election Cycle Committee Completed Audits
Re-Elect Dr. Jen Campbell for City Council 2022
Tommy Hough for San Diego City Council 2022
Antonio Martinez for City Council 2022

Six committee audits for the 2022 election cycle were completed in previous years and reported in prior annual reports. Work is underway to complete the seven remaining audits for the 2022 election cycle.

**Random Drawing for the 2024 Election Cycle Audits**

On September 11, 2025, the Commission hosted the random drawing of campaign committees from the 2024 election cycle, subject to audit. The drawing was conducted by representatives of the City Clerk’s Office. The 15 committees to be audited represent 57.7% of the 26 committees that were active during 2024 and are listed below.

2024 Election Cycle Committees Subject to Audit
Re-Elect Mayor Todd Gloria 2024
Ferbert for City Attorney 2024
Whitburn for City Council 2024
Maienschein for City Attorney 2024
Marni von Wilpert for City Council 2024
Sean Elo-Rivera for City Council 2024
Raul Campillo for San Diego City Council District 7 2024
Re-elect Joe LaCava for City Council 2024
Turner for Mayor 2024
Genevieve Jones-Wright for Mayor 2024
Chida Warren-Darby for City Council 2024
Turn San Diego Around in Support of Larry Turner for Mayor 2024, sponsored by The Lincoln Club Business League
Penny for Progress, Yes on Measure E
San Diegans for Fairness Supporting Todd Gloria for Mayor & Stephen Whitburn for Council 2024
Big City San Diego Supporting Todd Gloria for Mayor 2024

**EDUCATION AND ADVICE PROGRAM**

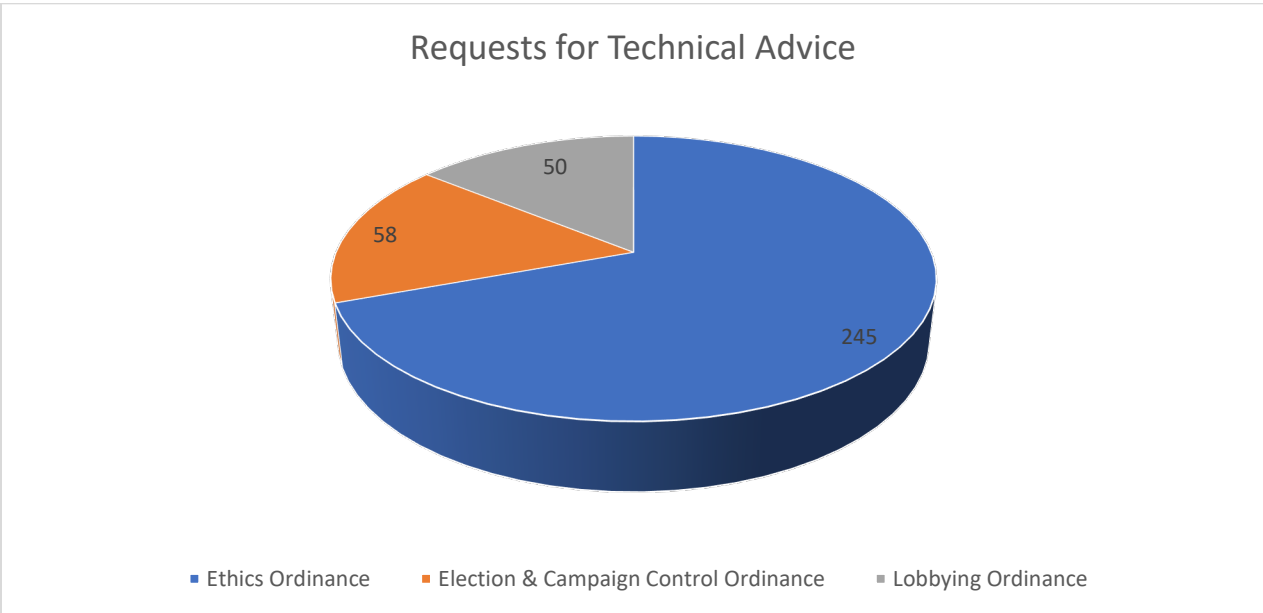
San Diego Municipal Code section 26.0401 outlines the Commission’s responsibility to advise and educate City officials and the public about governmental ethics laws. In 2025, the Commission prioritized education by conducting live training sessions, providing timely technical advice, maintaining up-to-date educational materials on its website, ensuring compliance with training requirements, and re-establishing its presence on social media.

**Technical Advice**

Education Program Manager, Ryan O’Connor, provides timely, technical legal advice to members of the regulated community seeking interpretation of governmental ethics laws. The Executive Director, Bryn Kirvin, and the Legislative Program Manager, Megan Curran, are also available to guide the regulated community. This is a core service that assists the regulated community in making decisions that comply with the ethics laws.

In 2025, the team responded to 353 requests for technical advice.

- Commission staff responded to approximately 245 requests for informal technical advice to assist City officials in complying with the Ethics Ordinance and its incorporated state ethics laws.
- Commission staff responded to approximately 58 requests for informal assistance from City candidates and treasurers, as well as various political committees participating in City elections.
- Commission staff responded to approximately 50 requests for informal advice and assistance concerning the City’s lobbying laws.



**Collaboration with the City Clerk’s Office**

The City Clerk and the Ethics Commission both support transparent and accountable government. The City Clerk is the City’s Filing Official for City officials, candidates, campaign committees, and lobbyists. The Commission monitors how filers comply with their mandated disclosures and provides technical assistance to filers.

In 2025, staff assisted the Clerk’s Office with questions related to the e-filing of financial disclosures required by candidates and committees and the e-filing of financial disclosures by lobbying firms, organization lobbyists, and expenditure lobbyists.

## ***Maintenance of Educational Resources***

Mr. O'Connor regularly updates the Commission's written educational resources with developments in relevant state law and regulations. Commission staff closely monitors the California Fair Political Practices Commission's (FPPC) activities, including actions taken through meetings, advice letters, legal opinions, and pending legislation. Staff ensures the regulated community is aware of any significant changes through its technical advice, training, and written resources. Staff also attends the annual Conference held by the Council on Governmental Ethics Laws, which helps cultivate staff skills and build relationships with organizations such as the FPPC.

The Commission maintains 47 Fact Sheets on its website. The Facts Sheets are detailed summaries of various ethics rules intended to assist the regulated community in navigating governmental ethics laws. Staff updated 21 previously issued Fact Sheets on the Commission's website to ensure the regulated community has current resources. Staff created a new Fact Sheet on travel in response to frequent questions from the regulated community about travel. Other website resources that were updated in 2025 include:

- Top Ten Lists for City [Candidates](#) and [Committees Making Independent Expenditures](#)
- City of San Diego Campaign Rules and State Law [Comparison Chart](#)
- The [Candidate](#), [Committee](#), and [Non-Committee](#) Campaign Manuals for the 2025-2026 election cycle.
- [The Major Funders \\$10,000+ Donor List](#)

## ***Social Media***

From 2016 to 2020, the Commission maintained a Twitter account. Recognizing social media as a dominant communication platform, staff spent 2025 discussing how to re-establish its social media presence and leverage its reach to advance the Commission's educational objectives. Those objectives include educating the Commission's regulated community and the public. Staff created a LinkedIn account and, in 2026, began posting meeting agendas and information about the Commission. This public engagement also promotes the spirit of the Ralph M. Brown Act, which ensures public access and participation in local government meetings.

## **TRAINING AND COMPLIANCE PROGRAM**

Mr. O'Connor leads many of the Commission's training presentations. He is often assisted by the Executive Director, Bryn Kirvin, and the Commission's Legislative Program Manager, Megan Curran. This training team conducts both live online and live in-person training. The regulated community may also take pre-recorded computer training modules. Training covers key concepts of the Political Reform Act and the local laws that incorporate it, as well as additional rules unique to the City of San Diego.

These laws are codified in the Ethics Ordinance, Lobbying Ordinance, and the Election Campaign Control Ordinance.

### ***Ethics Ordinance***

SDMC section 27.4501 et seq. is the City's Ethics Ordinance and outlines the ethics laws that govern the conduct of City officials. The rules cover a range of concepts, including conflicts of interest, misuse of position, gifts, and disclosure of economic interests, among others. The Commission is charged with providing training so that City officials are better able to navigate where their personal financial interests may intersect with their work at the City. In 2025, staff provided the following training opportunities related to the Ethics Ordinance:

- Staff conducted live training courses on the Ethics Ordinance for the Mayor and his staff, and Councilmembers and staff representing Council Districts 1, 2, 3, 4, 5, 6, 7, 8, and 9. This work trained 109 people in small, interactive classes for each office. Teaching the Mayor and Council offices separately allows for robust discussions and time to address the issues facing each office.
- Staff conducted four live training sessions on the Ethics Ordinance for 307 unclassified City employees who file Statements of Economic Interests (FPPC Form 700s). These two-hour sessions routinely have up to 100 participants and are taught in January, April, July, and October.
- Staff conducted a live training for upper management of the City Attorney's Office.
- Staff conducted a live training for the Planning Commission at its public meeting.
- Another 181 additional City Officials (primarily City consultants and volunteer members of City boards and commissions) used the Commission's online training program to learn about the City's Ethics Ordinance and the legal requirements they face.
- An additional 91 officials from the San Diego Housing Commission, San Diego Convention Center employees, as well as unclassified employees who were unable to attend a live training, used the Commission's online training program to learn about the law applicable to them under the Ethics Ordinance.

Staff collaborated to update the extended online training module for City Board and Commissioners, as well as all hypothetical scenarios used during the live training for City officials. The Commission anticipates that additional Commission online training modules will be revamped as the City migrates training to a new platform.

## ***Election Campaign Control Ordinance***

This City’s Election Campaign Control Ordinance, SDMC section 27,2901 et seq., is also referred to as “ECCO.” It governs the activities of City candidates, political committees, and campaign treasurers. It incorporates numerous state campaign laws. In October 2025, staff conducted a live training for candidates and committees operating in the City of San Diego elections during the 2025-26 election cycle. Additional sessions will be offered in 2026, leading up to the election date.

## ***Lobbying Ordinance***

SDMC section 27.4001 et seq. is the City’s Municipal Lobbying Ordinance. It governs individuals and entities that lobby City officials. In 2025, 17 lobbying firms and organization lobbyists completed the Commission’s online training for lobbyists.

## ***Compliance***

The Commission’s Administration & Training Compliance Program Manager, Victoria Velasquez, oversees and manages compliance within the Commission’s regulated community in its jurisdiction, who are required to attend ethics training.

<b>Persons Subject to Training and Enforcement</b>	<b>Department or Organization</b>
155	General Board and Commission members
241	Consultants
161	San Diego Housing Commission and Convention Center employees
201	City Attorney staff
117	Elected Officials and staff
106	Lobbyists
750	Unclassified Employees
19	Historical Resources Board and Planning Commission members
27	Candidates for elected office

Ms. Velasquez identifies training requirements for the regulated community, assigns the appropriate training, tracks completion, and handles corrective action for those out of compliance. In 2025, Ms. Velasquez worked with City IT staff to modernize the online training module for unclassified employees. She also launched a post-training survey for the live unclassified training module to gather feedback from attendees.

## ENFORCEMENT PROGRAM

Investigative Program Manager, Kristina Gagné, leads the Commission's enforcement program. She handles complaints and referrals, conducts jurisdictional analysis, and makes recommendations about opening investigations, dismissing cases, and resolving complaints. Ms. Gagné conducts investigations into alleged violations of the governmental ethics laws, collects evidence and interviews, drafts subpoenas, prepares investigative reports, and supports settlement negotiations. She also reviews registration and disclosure forms filed by campaign candidates and committees, City officials, lobbyists, and City consultants. The Commission upholds strict confidentiality, due process, and impartiality in its enforcement program. Due to confidentiality laws that protect the investigative process, the Commission is limited in what it can report here.

In 2025, Ms. Gagné helped formulate proposed amendments to the Commission's founding and enforcement ordinance for the Commission's consideration as described in the Legislation section above. Her expertise and institutional knowledge played a pivotal role in ensuring that the Municipal Code reflects the impact of Measure D and operational updates.

### ***Complaints Received***

Complaints are submitted through the Ethics Commission's online complaint submission portal, as well as via email, mail, telephone, referral, and in person.

In 2025, Commission staff received 162 Formal and Informal Complaints.<sup>1</sup>

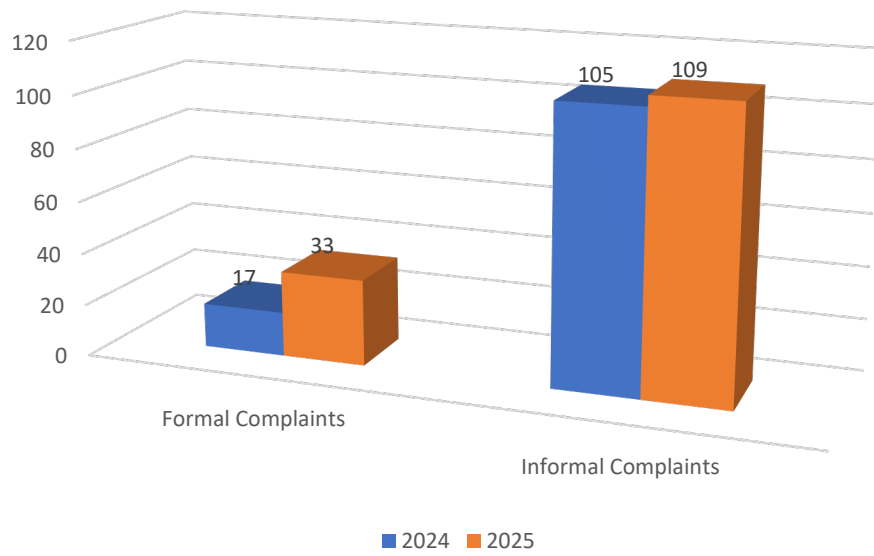
- 109 Informal Complaints were processed but closed before investigation.
- 33 Formal Complaints were processed but closed before investigation.
- 20 Informal Complaints were processed and authorized for investigation.

The 142 complaints that were processed but *closed* before investigation either: (1) contained insufficient information to support an allegation of a violation; or (2) alleged a violation that fell outside the Commission's jurisdiction. Complaints that are processed but closed before investigation are reviewed quarterly by the Chair and Vice-Chair to validate the decision to close.

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<sup>1</sup> This number does not include over 600 complaints submitted by the same Complainant. Staff reviewed these complaints to see if any allegations fell under the Ethics Commission's jurisdiction, but did not respond to the Complainant as she had been advised numerous times that we were not the proper entity to address her complaints.

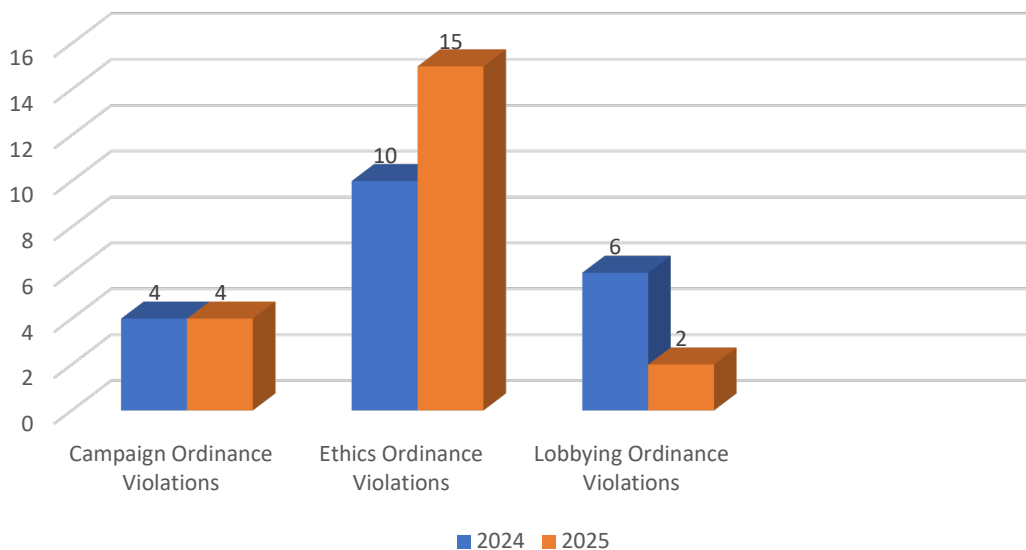
### Complaints Processed and Dismissed Before Investigation



### Investigations

As noted above, of the 162 total complaints received, 20 were processed and authorized for investigation. They were all Informal Complaints. No Formal Complaints were authorized for investigation. Complaints may include multiple allegations and may involve different types of violations of governmental ethics laws. The 20 Informal Complaints authorized for investigation totaled 21 separate violations of governmental ethics laws. The chart below breaks down the number and types of alleged violations investigated.

### Types of Alleged Violations Investigated



The 20 new investigations, along with 7 ongoing investigations from previous years, brought the total investigations for 2025 to 27. Investigations that resulted in dispositions in 2025 include the following:

- 12 investigations were dismissed by the Commission after considering the results of staff investigations. Some of the investigations were resolved after the Respondent took corrective action, cooperated with the investigation, and Commission staff provided education on the relevant law.
- 2 investigations resulted in stipulated settlements.
- 13 investigations were still pending as of December 31, 2025.

### ***Enforcement - Stipulations***

In 2025, the Commission resolved two matters following investigations through stipulated settlements.

[Jesús Cárdenas](#). Respondent paid a \$5,000 fine for participating in lobbying on a municipal decision that had a material financial effect on a client within twelve months of receiving more than \$500 in income from the client.

[Dr. Jennifer Campbell](#). Councilmember Campbell paid a \$300 fine for failure to keep original copies of two mailers disseminated by her campaign committee.

All fines are paid to the City of San Diego's General Fund and are not credited to the Commission's operating budget.

### ***Review of Lobbyist, Committee, and SEI Filings***

Commission enforcement staff reviews disclosure statements filed by the regulated community for compliance with the various disclosure laws. In support of the Commission's commitment to education, Ms. Gagné contacts members of the regulated community to ensure compliance with disclosure requirements when minor issues are identified. This work can lead to investigations and fines when enforcement staff identify violations during review.

In 2025:

- Enforcement staff reviewed lobbyist registrations and quarterly reports. In 2025, staff examined the registration forms and quarterly reports filed by 120 lobbying firms and organization lobbyists. These reviews assess whether lobbyists have adequately disclosed legally required information. Commission staff conducts outreach to lobbyists to seek more robust disclosures and amendments or to request disclosure of missing information.

- Enforcement staff reviewed filings by primarily formed committees and sent eight letters to principal officers informing them of their duties under the law.
- Enforcement staff checked a sample of Statements of Economic Interests filed by City employees for missing and inaccurate data. In 2025, Commission staff reviewed at least 20 employee SEIs to assess compliance with the City’s ethics laws.

## **LEGISLATIVE PROGRAM**

Legislative Program Manager, Megan Curran, is responsible for overseeing and implementing the Commission’s Legislative Program. In 2025, Ms. Curran coordinated and led the Commission’s review of its founding and enforcement ordinance, SDMC section 26.0401 et seq. She also monitors state legislation and FPPC regulatory developments that impact the governmental ethics laws. Ms. Curran ensures that the Commission is informed about civic developments that may impact the governmental ethics laws and the regulated community by monitoring City government action and other current events. Ms. Curran continues to track and analyze amendments and regulations related to the Levine Act. This state law prohibits “pay-to-play” politics in California and applies to the City’s elected officials. The Commission endeavors to keep its regulated community informed about this important law.

### ***Measure D Added Charter Section 41.3***

Measure D amended the City Charter to add Section 41.3, strengthening the Commission's independence.

<b>Key Impacts of Measure D</b>	
<input checked="" type="checkbox"/>	Ensures sufficient funding to operate Commission programs.
<input checked="" type="checkbox"/>	Grants the Executive Director the ability to authorize investigations.
<input checked="" type="checkbox"/>	Vests power in the Executive Director to subpoena witnesses and records, compel attendance and testimony, and conduct investigations.
<input checked="" type="checkbox"/>	Empowers the Commission to hire its Executive Director.
<input checked="" type="checkbox"/>	Authorizes the Executive Director to divulge evidence of possible unlawful conduct to other government or law enforcement agencies.
<input checked="" type="checkbox"/>	Enables the Commission to adopt its own policies and regulations.
<input checked="" type="checkbox"/>	Authorizes the Commission to retain its own legal counsel.

## ***Commission Review of SDMC 26.0401 et seq.***

With the new Charter section, the Commission was tasked with making proposals to ensure that its founding and enforcement code reflects the impact of Measure D. When the proposed ballot measure was presented to the Council, the Commission identified specific areas of the code that require updates, given that there have been no significant updates to the code section since it was codified in 2001. For efficiency, both Measure D updates and operational updates are intended to be presented to Council in the same package.

In March 2025, the staff divided SDMC sections 26.0401 through 26.0456 into groups and assigned each group to a month in which the Commission was scheduled to meet for the rest of the year. Staff met monthly to review the sections to be discussed by the Commission at the following month's meeting and to develop ideas for related amendments. Staff then met with independent counsel to review the sections and ideas, craft proposals, and categorize them into policy and non-policy categories for the Commission's consideration. Ms. Curran prepared staff reports describing the proposals and tracked the proposed changes for the Commission's consideration.

Once the Commission provided its feedback, Ms. Curran implemented any changes, and the proposed amendment language was presented to the Commission for its final review at the following meeting. In December 2025, the Commission completed its review of most subsections and anticipates forwarding all proposed amendments to the City Attorney's Office in or around April 2026.

Staff looks forward to working with the City Attorney's Civil Advisory Division to refine the Commission's proposed amendments further, draft staff reports to accompany the proposals, and together present the legislative package to the Council's Rules Committee and the entire Council.

## ***Classifieds Project***

In 2019, the Office of the City Auditor conducted a Hotline Investigation into gifts received by a City employee who was not subject to the Ethics Ordinance and, therefore, not under the Commission's jurisdiction. The Auditor uncovered several significant ethics violations and recommended adding Classified employees who file Form 700 Statements of Economic Interests (SEIs) to the Commission's jurisdiction for education and enforcement (the recommendation).

In 2025, Commission staff drafted the strikeout language for the relevant Municipal Code amendments needed to implement the recommendation. On March 13, 2025, the Commission approved the proposed language. On May 9, 2025, staff submitted the language to the City Attorney's Office for review.

Implementation is uncertain because the change will require the City's Management Team for Labor Relations to engage in the meet-and-confer process, as required by the Meyers-Milias-Brown Act, on the mandatory subjects of bargaining related to the draft

Ordinance. Further, the recommendation cannot be implemented without additional staff and budget, as well as a reasonable implementation timeline. Adding nearly 1,000 City employees to its jurisdiction, on top of the 1,750 it now regulates under the Ethics Ordinance alone, is not possible without a phased expansion of staff. Under the recommendation, Classified employees would be subject to required training, would require ongoing technical advice services from Commission staff, and may be subject to investigations, enforcement, and fines.

## **INDEPENDENT LEGAL COUNSEL**

Charter section 41.3 authorizes the Commission to retain its own legal counsel, independent of the City Attorney, for legal support and guidance in carrying out its responsibilities and duties. General Counsel Christina Cameron of Devaney Pate Morris & Cameron LLP fulfills this role. In 2025, Ms. Cameron provided critical support during the transition between executive directors. She also played an instrumental role in the legislative review of SDMC section 26.0401 et seq. and in developing proposed amendments.

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*For more information about the Ethics Commission, please visit our website [www.sandiego.gov/ethics](http://www.sandiego.gov/ethics), or contact our office at [ethicscommission@sandiego.gov](mailto:ethicscommission@sandiego.gov) or by phone (619) 533-3476. The website provides details about the Commission, its procedures, and the City's ethics laws, as well as a portal for the public to file ethics complaints within the Commission's jurisdiction.*