

**SAN JOSE ETHICS COMMISSION**  
Annual Report for FY 2014-15

Objective for FY 2014-15	Timeframe	Status & Accomplishments	Future Target/Goals
<p>1. Monitor compliance with all campaign and ethics ordinances in Title 12 of the Municipal Code [Ref: SJMC 12.04.070(A)]</p>	<p>July 2014 - June 2015</p>	<ul style="list-style-type: none"> <li>• Updated the schedule for periodic review and analysis of compliance data obtained from the city clerk's prima facie review of disclosures and reports filed in accordance with campaign and ethics ordinances (October 2014)</li> <li>• Periodically reviewed compliance data obtained from the city clerk's prima facie review of disclosures and reports (Ongoing)</li> <li>• Reviewed cumulative results of compliance monitoring conducted during FY 2014-15 and identified potential areas of concern for further evaluation and possible action [see Objective #3 below] (June 2015)</li> <li>• Worked with the city clerk to explore opportunities for multi-language outreach to ethnic communities regarding campaign and ethics regulations (Ongoing)</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to periodically review compliance data obtained from the city clerk's prima facie review of disclosures and reports to identify potential areas of concern</li> <li>• Work with the city clerk and city attorney to develop and implement a plan for improving overall compliance with campaign and ethics regulations</li> <li>• Continue working with the city clerk to develop and implement a plan for multi-language outreach to ethnic communities</li> </ul>
<p>2. Review and investigate allegations of violations of Title 12 and take enforcement action where appropriate [Ref: SJMC 12.04.070(B)]</p>	<p>July 2014 - June 2015</p>	<ul style="list-style-type: none"> <li>• Conducted hearings for and dismissed eight complaints that, upon review, did not identify specific facts demonstrating sufficient cause for investigation (July 2014, February 2015, April 2015, May 2015, June 2015)</li> <li>• Investigated 15 complaints and conducted hearings to determine appropriate disposition:               <ul style="list-style-type: none"> <li>○ For eight complaints, found that no violations had occurred (December 2014, April 2015)</li> <li>○ For two complaints, found that violations of SJMC 12.06.510 [Voluntary campaign expenditure limits] had occurred, but imposed no penalties due to mitigating circumstances (September 2014, May 2015)</li> <li>○ For one complaint, found that violations of</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Continue to review, investigate and take appropriate enforcement action for each allegation per Resolution 76954, with the objective of having the independent evaluator's report and recommendations available within 30 calendar days after receipt of a complaint</li> </ul>

SAN JOSE ETHICS COMMISSION  
Annual Report for FY 2014-15

Objective for FY 2014-15	Timeframe	Status & Accomplishments	Future Target/Goals
2. (continued)		<p>SJMC 12.06.910 [Statements and reporting requirements] had occurred, but imposed no penalties due to mitigating circumstances (March 2015)</p> <ul style="list-style-type: none"> <li>○ For four complaints, found that violations of SJMC 12.06.1010 [Disclosure of electioneering communications] had occurred, but imposed no penalties due to mitigating circumstances (November 2014, March 2015)</li> <li>● Reviewed cumulative results of investigations conducted during FY 2014-15 and identified potential areas of concern for further evaluation and possible action [see Objective #3 below] (June 2015)</li> <li>● Worked with the city attorney and city clerk to extend the existing contract for the independent evaluator/investigator by six months to provide continuity in the process for handling election-related complaints (October 2014)</li> <li>● Issued a request for qualifications, reviewed proposals, interviewed candidates, selected an independent evaluator/investigator and submitted a contract for approval by the city council prior to expiration of the existing contract (May 2015)</li> </ul>	
3. Make recommendations to the city council with regard to campaign and ethics regulations and policies [Ref: SJMC 12.04.070(C)]	July 2014 - June 2015	<ul style="list-style-type: none"> <li>● No issues were referred by the city council (Ongoing)</li> <li>● Periodically reviewed emerging ethics and campaign issues and associated legislative and judicial activity (Ongoing)</li> <li>● No progress was made on development of</li> </ul>	<ul style="list-style-type: none"> <li>● Continue to provide recommendation(s) in response to issues referred by the city council, including those identified in the mayor's biennial ethics review, with the objective of providing responses within 120 calendar days</li> <li>● Continue to periodically review emerging</li> </ul>
3. (continued)			

SAN JOSE ETHICS COMMISSION  
Annual Report for FY 2014-15

Objective for FY 2014-15	Timeframe	Status & Accomplishments	Future Target/Goals
		<p>proposed amendments to the Gift Ordinance due to higher priorities in the city attorney's office (Ongoing)</p> <ul style="list-style-type: none"> <li>• Evaluated potential areas of concern identified through compliance monitoring and investigations conducted by the commission during FY 2014-15 [see Objectives #1 and #2 above] and prioritized issues (June 2015)</li> </ul>	<p>issues and associated legislative and judicial activity to assess impact and identify potential areas of concern</p> <ul style="list-style-type: none"> <li>• Continue working with the city attorney to develop proposed amendments to the Gift Ordinance for approval by the city council</li> <li>• Work with the city attorney and city clerk to develop:               <ul style="list-style-type: none"> <li>○ specific recommendations addressing areas of concern identified during FY 2014-15</li> <li>○ draft ordinance(s) and a draft revision of Resolution 76954 for approval by city council; and</li> <li>○ revisions of administrative procedures and forms</li> </ul> </li> </ul>
4. Settle challenges to commission decisions in accordance with Section 4.24.050 of Title 4 [Ref: SJMC 12.04.070(D)]	July 2014 - June 2015	<ul style="list-style-type: none"> <li>• No challenges were received (Ongoing)</li> </ul>	<ul style="list-style-type: none"> <li>• Settle challenges to commission decisions as required</li> </ul>
5. Respond to complaints alleging that records or some part of records are being withheld improperly under the Public Records Act [Ref: SJMC 12.21.430(C)]	July 2014 - June 2015	<ul style="list-style-type: none"> <li>• No complaints were received (Ongoing)</li> </ul>	<ul style="list-style-type: none"> <li>• Review and evaluate each public records complaint as required, and respond within 30 calendar days</li> </ul>
6. Provide to the council each fiscal year an annual work plan of activities to be undertaken and a subsequent report of accomplishments [Ref: SJMC 2.08.030(C)]	July 2014 - June 2015	<ul style="list-style-type: none"> <li>• Developed and issued the 2015-16 work plan (June 2014)</li> <li>• Developed and issued the 2014-15 annual report (June 2014)</li> </ul>	<ul style="list-style-type: none"> <li>• Continue issuing work plans and annual reports as required</li> </ul>