



**CITY OF OAKLAND
PUBLIC ETHICS COMMISSION**
Regular Commission Meeting
One Frank Ogawa Plaza (City Hall)
Hearing Room 2
Wednesday, September 16, 2026
6:30 p.m.

This meeting will be streamed live online at [KTOP | City of Oakland, CA](#) and via Zoom.
See the [instructions](#) at the end of the agenda for how to participate in-person or remotely.

Commissioners:

Francis Upton IV (Chair) | Karun Tilak (Vice-Chair) | Luke Apfeld | Tanya Bayeva |
L. Lawrence Brandon | Angi Fisher | Ryan Micik

Commission Staff to attend:

Suzanne Doran, Executive Director | Tovah Ackerman, Enforcement Chief |
Jelani Killings, Ethics Analyst

Legal Counsel:

Oliver Luby, Deputy City Attorney

PUBLIC ETHICS COMMISSION REGULAR MEETING AGENDA

PRELIMINARY ITEMS

1. Roll Call and Determination of Quorum.

2. Staff and Commission Announcements.

3. Open Forum.

- Open forum is a time for a member of the public to comment on any matter within the jurisdiction of the Public Ethics Commission (PEC) that is not otherwise included in tonight's agenda. Read the Commission's ***Core Values for Inclusive Engagement (Adopted May 6, 2019)*** on our [website](#).
- Under the Sunshine Ordinance, the Commission cannot discuss the substance of any public comment made that does not pertain to an item listed on the agenda.
- The Commission urges members of the public not to make complaints or ask the Commission to investigate alleged legal violations at public meetings since public disclosure of such complaints or requests may undermine any subsequent investigation undertaken. Contact staff at ethicscommission@oaklandca.gov for assistance in filing a complaint.

ACTION ITEMS

4. Approval of Commission Meeting Minutes.



Regular Commission Meeting
Wednesday, September 16, 2026,
6:30 p.m.

- a. **Commission Meeting Draft Minutes for July 15, 2026, Regular Meeting.** ([Attachment: July 15, 2026, Regular Meeting Minutes](#))
 - b. **Commission Meeting Draft Minutes for August 14, 2026, Special Meeting.** ([Attachment: August 14, 2026, Special Meeting Minutes](#))
5. **Case No. 24-30: In the Matter of Unknown Respondent(s).** On September 24, 2024, PEC staff received a formal complaint alleging that eleven Oakland Police Department (OPD) officers misused \$12,000 of Measure Z funds to go to the annual police officer's memorial in Washington DC. While travel to a memorial is not a permissible use of Measure Z funds, PEC staff documented and confirmed that the misspent funds were returned to the Measure Z account from the OPD general purpose account. Additionally, PEC staff determined that the misuse of these funds did not constitute a Misuse of City Resources violation because travel to honor fallen officers could constitute a city purpose authorized by law. However, because of the appearance of impropriety, PEC staff recommend issuing an advisory letter to OPD to educate them on the requirements of the Government Ethics Act regarding Misuse of City Resources. ([Attachment: Staff Memorandum, August 12, 2026](#))
6. **Case No. 26-08: In the Matter of the Oakland Police Commission.** On April 15, 2026, PEC staff received a formal complaint alleging that between September 20, 2025, and October 10, 2025, four members of the Oakland Police Commission (OPC) exchanged emails about the Militarized Equipment Ad Hoc Committee's recommendation regarding the Oakland Police Department's (OPD) divestiture of a BearCat armored vehicle. Four members of the OPC constitute a quorum and discussing this issue outside a public meeting constituted a violation of § 2.20.030(F)(1) of the Oakland Sunshine Ordinance. § 2.20.270(D) of the Oakland Sunshine Ordinance provides that when the PEC determines a violation has occurred, the local body (here, the OPC) "shall agendize for immediate determination whether to correct and cure the violation." PEC staff recommend closure of PEC # 26-08 with a finding that four members of the OPC violated § 2.20.030(F)(1) and issuance of an advisory letter to the OPC to direct the OPC to agendize the matter for an upcoming meeting. ([Attachment: Staff Memorandum, August 12, 2026](#))
7. **Case Closure Plan.** PEC staff are working to close older, low-level cases according to a seven-point rubric to address a severe complaint backlog. Enforcement staff recommend the following cases for closure as part of that plan. ([Attachment: Staff Memo dated September 4, 2026](#))
 - a. **In the Matter of Trevelyan Jones (Former Captain, Police Department) (PEC # 22-26).** Staff recommends that the Commission close PEC Case No. 22-26 with no further action.
 - b. **In the Matter of Former Oakland Police Commissioner Regina Jackson et al. (PEC # 24-06).** Staff recommends that the Commission close PEC Case No. 24-06 with an advisory letter.



Regular Commission Meeting
Wednesday, September 16, 2026,
6:30 p.m.

INFORMATION ITEMS

8. **Commissioner Recruitment.** The Commission is recruiting to fill a Commission appointed vacancy that will occur in January 2027. A second vacancy to occur at the same time will be subject to appointment by the City Attorney. Attached are the vacancy announcement and application that is being distributed widely via the Commission's website, email distribution lists, social media, and other channels. ([Attachments: Announcement and Application; Recruitment Flyer](#))
9. **Campaign Disclosure Tools Demo.** The Commission will receive a demonstration of the Commission's online election transparency tools. Ethics Analyst Niels Thorsen will provide a demonstration of the online application visualizing campaign data for the 2026 election. [OpenDisclosure](#) is a partnership between the Public Ethics Commission and Open Oakland, the local organization of civic volunteers. The online app, www.opendisclosure.io, is now live for the 2026 election.
10. **Executive Director Report.** This report provides updates regarding departmental programs and operations, such as budget, staffing, and PEC legislative and policy initiatives since the last Commission meeting. Specific programs updates, such as public records mediations, disclosure, and engagement, are included as attachments. ([Attachment: Executive Director Report dated September 3, 2026; Engagement & Compliance Program Report dated September 2, 2026; Mediation Program Report dated September 1, 2026](#))
11. **Enforcement Program Report.** This report provides updates regarding Enforcement Division programs and operations such as caseload, enforcement-related litigation, and complaint dismissals since the last Commission meeting. ([Attachment: Enforcement Report dated September 4, 2026](#)).
12. **Reports on Subcommittees and Other Commissioner Assignments.** The Commission Chair may appoint individual commissioners to perform specific tasks or functions by serving on standing or ad hoc committees ([Public Ethics Commission Operations Policies, Article V](#)). Current Standing and Ad-hoc Subcommittee assignments are posted on the [Commission website](#). Commissioners may discuss subcommittee assignments, create a new subcommittee, or report on work done in subcommittees since the Commission's last regular meeting. Commissioners may also provide updates on assignments, efforts, and initiatives they undertake to support the Commission's work.
 - a. **Transparency Ad Hoc Subcommittee** (ad hoc, created March 18, 2026) - Upton IV (Chair), Apfeld, Fisher ([Attachment: 7/30/26 Minutes](#))
 - b. **Democracy Dollars Pilot Ad Hoc Subcommittee** (ad hoc, created May 7, 2026) - Micik (Chair), Bayeva, Brandon



Regular Commission Meeting
Wednesday, September 16, 2026,
6:30 p.m.

13. Future Meeting Business. Commissioners and staff may propose topics for action or discussion at future Commission meetings.

The meeting will adjourn upon the completion of the Commission's business.

Should you have questions or concerns regarding this agenda, or wish to review any agenda- related materials, please contact the Public Ethics Commission at ethicscommission@oaklandca.gov or visit our webpage at www.oaklandca.gov/pec.

A handwritten signature in black ink that reads "Suzanne Doran".

Approved for Distribution

09/04/2026

Date

PUBLIC PARTICIPATION

In addition to attending in-person, the following options for public viewing and participation are available:

Livestream Online

Go to the City of Oakland's KTOP livestream page here:

<https://www.oaklandca.gov/services/ktop-tv10-program-schedule> click on "View"

Video Conferencing Access

To access this meeting using Zoom, use the Zoom Meeting link:

<https://us02web.zoom.us/j/89169308829> . You will then be prompted to enter the following information:

- Name: This field is required to be entered; however, if you wish to remain anonymous, you may type "Public" in the name field.
- Email Address: This field is required to be entered; however, if you wish to remain anonymous, you may type "Public@public.com" in the email field.

Follow the on-screen prompts to join the meeting. You may be asked to download the Zoom application.

Audio Conferencing Access



To access this meeting by phone, do the following:

- Telephone: Dial (for higher quality, dial a number based on your current location): US: +1 669 900 6833 or +1 669 444 9171 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 931 3860 or +1 689 278 1000 or +1 929 205 6099 or +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 Webinar ID: 891 6930 8829
- International numbers available: <https://us02web.zoom.us/j/kc69Y2Mnzf>

Public Comment

A member of the public may speak on any item listed on the agenda either in-person or remotely. Speakers are generally limited to three minutes per item, although the Chair may adjust the time based on the number of speakers.

Members of the public may also submit written comments in advance of the meeting to **EthicsPublicComment@oaklandca.gov**. Please indicate the agenda item # you are commenting on in the subject line of the email. All written public comments received at least 24 hours prior to the meeting will be posted on the meeting webpage prior to the meeting as part of the public record and provided at the meeting with agenda materials.

The purpose of Public Comment is for Commissioners to hear from members of the public. After the close of each Public Comment period, the Commission may address questions or concerns that were raised during the public comment period.

Remote Public Comment

Ensure you are in a quiet location. Before you speak, mute the sound of any equipment around you, including television, radio, or computer. It is especially important that you reduce the volume of your computer speaker if you are watching via the Zoom link, to prevent feedback and echo when you speak.

Zoom

- If you connect to the meeting via Zoom, use the **raise hand button** to indicate that you want to speak on an item and to be added to the public comment queue.
- It is your turn to speak when Zoom displays, "The host has unmuted you."
- When you hear PEC staff say, "Welcome Caller," you are encouraged to state your name clearly. As soon as you begin speaking you will have three minutes to provide your public comment (six minutes if you are on the line with an interpreter).
- Once your three minutes have expired, PEC staff will mute you. Zoom will display, "You're



muted.”

- Attendees who want to speak during other public comment periods may stay on the line and listen for the next public comment opportunity and should press the raise hand button to enter the public comment queue again.

Telephone Audio Conferencing

- If you connect to the meeting via telephone, dial *9 to raise your hand to indicate that you want to speak on an item and to be added to the public comment queue.
- When the system message says, “You’re unmuted,” this is your turn to speak.
- When you hear the PEC staff say, “Welcome Caller,” you are encouraged to state your name clearly. As soon as you begin speaking you will have three minutes to provide your public comment (six minutes if you are on the line with an interpreter).
- Once your three minutes have expired, PEC staff will mute you. You will hear, “You’re muted.”
- Attendees who want to speak during other public comment periods may stay on the line and listen for the next public comment opportunity and should dial *9 to raise their hands to enter the public comment queue again.

Language Access

Do you need an ASL, Cantonese, Mandarin or Spanish interpreter or other assistance to participate? Please email ethicscommission@oaklandca.gov or call (510) 238-3593 Or 711 (for Relay Service) five business days in advance.

¿Necesita un intérprete en español, cantonés o mandarín, u otra ayuda para participar? Por favor envíe un correo electrónico a ethicscommission@oaklandca.gov o llame al (510) 238-3593 al 711 para servicio de retransmisión (Relay service) por lo menos cinco días antes de la reunión. Gracias.

你需要手語, 西班牙語, 粵語或國語翻譯服務嗎? 請在會議五天前電 郵 ethicscommission@oaklandca.gov or 或致電 (510) 238-3593 或711 (電話傳達服務)。

Quý vị cần một thông dịch viên Ngôn ngữ Ký hiệu Mỹ (American Sign Language, ASL), tiếng Quảng Đông, tiếng Quan Thoại hay tiếng Tây Ban Nha hoặc bất kỳ sự hỗ trợ nào khác để tham gia hay không? Xin vui lòng gửi email đến địa chỉ ethicscommission@oaklandca.gov or hoặc gọi đến số (510) 238-3593 hoặc 711 (với Dịch vụ Tiếp âm) trước đó năm ngày.



Regular Commission Meeting
Wednesday, September 16, 2026,
6:30 p.m.



This meeting location is wheelchair accessible.

CITY OF OAKLAND
PUBLIC ETHICS COMMISSION
Regular Commission Meeting
One Frank Ogawa Plaza (City Hall)
Hearing Room 2
Wednesday, July 15, 2026
6:30 p.m.



Commissioners:

Francis Upton IV (Chair) | Karun Tilak (Vice-Chair) | Luke Apfeld | Tanya Bayeva |
L. Lawrence Brandon | Angi Fisher | Ryan Micik

Commission Staff in Attendance:

Suzanne Doran, Executive Director | Tovah Ackerman, Enforcement Chief |
Jelani Killings, Ethics Analyst

Legal Counsel:

Oliver Luby, Deputy City Attorney

PUBLIC ETHICS COMMISSION REGULAR MEETING MINUTES

PRELIMINARY ITEMS

1. Roll Call and Determination of Quorum.

The meeting was called to order at 6:35 p.m.

Members present: Chair Francis Upton IV, Vice-Chair Karun Tilak, Luke Apfeld, and Angi Fisher.

Members excused: Tanya Bayeva, L. Lawrence Brandon, and Ryan Micik.

Staff present: Suzanne Doran, Executive Director; Tovah Ackerman, Enforcement Chief; Jelani Killings, Ethics Analyst.

Legal Counsel: Oliver Luby, Deputy City Attorney.

2. Staff and Commission Announcements.

Chair Upton announced that members of the public can now participate in meetings remotely via Zoom.

Executive Director Doran introduced Dillon Bezeherntny, who joins the PEC July 18th as a new Ethics Investigator as well as summer Management Intern Katherine Stein.

3. Open Forum.

Chair Upton provided an overview of the rules for public comment during PEC meetings and how to participate via Zoom or phone.

Public Comment: Gene Hazzard.

ACTION ITEMS

4. Approval of Commission Meeting Draft Minutes for May 20, 2026, Regular Meeting.

CITY OF OAKLAND
PUBLIC ETHICS COMMISSION
Regular Commission Meeting
One Frank Ogawa Plaza (City Hall)
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Wednesday, July 15, 2026
6:30 p.m.



Tilak moved, and Apfeld seconded to adopt the May 20, 2026, regular meeting minutes.

Public Comment: Gene Hazzard.

Ayes: Tilak, Apfeld, Fisher, Upton.

Noes: None.

Abstentions: None

Vote: 4-0.

Motion passed.

Chair Upton requested the order of the agenda be modified by moving Item 6 – Guest Presentation – Ethical Climate Survey after Item 4 as a courtesy to the guest speaker.

6. GUEST PRESENTATION - Ethical Climate Survey

City Auditor Michael Houston presented the results of the Ethical Climate Survey. The Office of the City Auditor surveyed City employees in late 2025 and early 2026. Developed by the Institute for Local Government, the survey assesses the agency's ethical climate and decision-making capacity at both organizational and individual levels.

Public Comment: Gene Hazzard.

5. Case Closure Plan.

PEC staff are working to close cases according to a seven-point rubric to address a severe complaint backlog. Enforcement Chief Tovah Ackerman presented, and the Commission discussed the staff's recommendation to close the following cases:

- In the Matter of David Silver (PEC # 19-16). Staff recommends that the Commission close PEC Case No. 19-16 with no further action.
- In the Matter of Tyfahra Milele and the Oakland Police Commission (PEC # 23-01). Staff recommends that the Commission close PEC Case No. 23-01 with no further action.
- In the Matter of Ronnie Turner (PEC # 24-13). Staff recommends that the Commission close PEC Case No. 24-13 with no further action.

Apfeld moved, and Upton seconded, to adopt the staff's recommendation.

Public Comment: Gene Hazzard.

Ayes: Tilak, Apfeld, Fisher, Upton.

Noes: None.

CITY OF OAKLAND
PUBLIC ETHICS COMMISSION
Regular Commission Meeting
One Frank Ogawa Plaza (City Hall)
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Wednesday, July 15, 2026
6:30 p.m.



Abstentions: None.

Vote: 4-0.

Motion passed.

INFORMATION/DISCUSSION ITEMS

7. Limited Public Financing Program Overview and 2026 Guide.

Senior Ethics Analyst Jelani Killings provided an overview of upcoming activities to implement the Limited Public Financing Program for the November election and presented the updated Limited Public Financing Act Guide. Mr. Killings shared that the Commission must hold a special meeting in August to determine whether the allotted LPF funds will be adequate to provide the maximum amount of funds to potentially eligible candidates, and to decide on a process for disbursement of available funds on a pro rata or another equitable basis.

Public Comment: Gene Hazzard.

8. Enforcement Report.

Enforcement Chief Tovah Ackerman reported, and Commissioners discussed, a summary of the Commission's enforcement process, caseload, enforcement-related litigation, and case closures or dismissals.

Public Comment: Gene Hazzard.

9. Executive Director Report.

Executive Director Suzanne Doran reported on overall priorities and PEC activities, such as budget, staffing, and PEC legislative and policy initiatives, since the last Commission meeting, as well as specific program updates included as attachments.

Public Comment: Gene Hazzard.

10. Reports on Subcommittees and Commissioner Assignments.

Chair Upton provided an update on the Transparency Ad-Hoc Subcommittee.

Public Comment: Gene Hazzard.

11. Future Meeting Business.

Commissioner Apfeld requested future discussion on establishing an Enforcement Subcommittee.

Public Comment: None.

The meeting adjourned at 8:12 p.m.

CITY OF OAKLAND
PUBLIC ETHICS COMMISSION
Special Commission Meeting
One Frank Ogawa Plaza (City Hall)
Hearing Room 2
Friday, August 14, 2026
6:30 p.m.



Commissioners:

Francis Upton IV (Chair) | Karun Tilak (Vice-Chair) | Luke Apfeld | Tanya Bayeva |
L. Lawrence Brandon | Angi Fisher | Ryan Micik

Commission Staff in Attendance:

Jelani Killings, Senior Ethics Analyst | Carina Lieu, Program Manager |
Bhawna Chowdhary, Ethics Analyst

Legal Counsel:

Oliver Luby, Deputy City Attorney

PUBLIC ETHICS COMMISSION SPECIAL MEETING MINUTES

PRELIMINARY ITEMS

1. Roll Call and Determination of Quorum.

The meeting was called to order at 6:30 p.m.

Members present: Chair Francis Upton IV, Luke Apfeld, Angi Fisher, Tanya Bayeva, L. Lawrence Brandon, and Ryan Micik.

Members excused: Vice-Chair Karun Tilak

Staff present: Jelani Killings, Senior Ethics Analyst; Carina Lieu, Program Manager; Bhawna Chowdhary, Ethics Analyst.

Legal Counsel: Oliver Luby, Deputy City Attorney.

2. Staff and Commission Announcements.

Chair Upton announced that members of the public can now participate in meetings remotely via Zoom.

Senior Ethics Analyst Jelani Killings introduced Carina Lieu, who joined the PEC on July 27th as a new Program Manager.

3. Open Forum.

Chair Upton provided an overview of the rules for public comment during PEC meetings and how to participate via Zoom or phone.

Public Comment: Jesse Lucas.

ACTION ITEMS

4. Limited Public Financing Act Program 2026.

CITY OF OAKLAND
PUBLIC ETHICS COMMISSION
Special Commission Meeting
One Frank Ogawa Plaza (City Hall)
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Friday, August 14, 2026
6:30 p.m.



The Commission received and discussed a staff report regarding the available funds for the Limited Public Financing Program and how to distribute funds to candidates running for City Council district office in the November 2026 election.

Brandon moved, and Fisher seconded, to find that the amount of money in the election campaign fund is adequate to provide the maximum amount of funds allowable by law to each potentially eligible candidate.

Public Comment: None.

Ayes: Apfeld, Bayeva, Brandon, Fisher, Micik, Upton.

Noes: None.

Abstentions: None

Vote: 6-0.

Motion passed.

The meeting adjourned at 6:45 p.m.



ENFORCEMENT UNIT
PUBLIC ETHICS COMMISSION
CITY OF OAKLAND
250 Frank H. Ogawa Plaza
Suite 6303
Oakland, CA 94612
(510) 238-3593
TDD (510) 238-3254

TO: Public Ethics Commission
FROM: Tovah Ackerman, Enforcement Chief
DATE: August 12, 2026
RE: Case No. 24-30: In the Matter of Unknown Respondent(s), prepared for the September 16, 2026 Public Ethics Commission Meeting

Requested Action: Approve staff recommendation to close PEC No. 24-30 with an advisory letter to raise Oakland Police Department awareness about City of Oakland Government Ethics Act (GEA) misuse of city resources rules.

FACTS AS STATED IN COMPLAINT

On September 24, 2024, PEC staff received a formal complaint from Omar Farmer with the following statement:

As the Chairperson of the Public Safety and Services Oversight Commission (SSOC) it was reported to us at our August 2024 meeting that eleven OPD officers used \$12k worth of Measure Z funds to go on a trip to the annual police officer's memorial in Washington DC. Measure Z funds are restricted on being used to pay for costs related to or arising from efforts to reduce 911 response times and to reduce homicides, robberies, burglaries, and gun-related violence. We learned about this use of funds at our 8-26-2024 monthly meeting that can be found on the SSOC webpage under Item 8. We discussed it further during item 13. Page 89 of the agenda shows their report. I also had a meeting with the City Administrator's Office on 08/27/2024 where Joe DeVries said that the funds would be returned. But I received an email this week from our SSOC staff person Felicia Verdin stating that the funds may not be returned. The City Administrator's Office may have a copy of a video of that meeting if you would like to see it.

In addition to the original complaint document, the Complainant raised concerns about Measure Z¹ funds being used to send officers to a memorial service in Sacramento, CA in addition to the event in Washington, D.C.

¹ Measure Z's full title is "The 2014 Oakland Public Safety and Services Violence Prevention Act."

ADDITIONAL INFORMATION GATHERED BY STAFF

PEC staff gathered the following background information regarding the timeline of events:

- On November 4, 2014, voters passed [Ballot Measure Z](#).
- On March 27, 2024, City Administrator Jestin Johnson shared a memo that placed a moratorium on training and travel/conference requests. The [FY 2024-25 Expenditure Report](#) indicated that the moratorium on professional training and conferences remained in effect in 2025, past the dates of travel and expenditures related to this matter.
- On May 3, 2024, Interim Chief of Police Darren Allison submitted a memo to City Administrator Jestin Johnson requesting authorization to use Measure Z (and JAG grant) funds to pay for travel to Washington, D.C. for the National Peace Officers' Memorial.
- The National Peace Officers' Memorial took place from May 11 – 16, 2024, in Washington, D.C. Officer Tuan Le was honored at a memorial service on May 15, 2024.
- Measure Z, which had a lifespan of ten years, [expired at the end of 2024](#).

The record does not contain documentation of the exact date(s) that Measure Z funds were used to make purchases related to the National Peace Officers' Memorial. However, the purchases most likely took place between May 3, 2024, and May 15, 2024—the date on which OPD requested authorization for the expenditures and the date of the actual memorial service. This time period falls within the range in which the moratorium on training and travel/conference requests was in effect.

In an interview with former PEC staff, Oakland Police Department (OPD) Fiscal Services Manager LaRajia Marshall explained how the spending for the Washington, D.C. trip occurred. She explained that OPD felt strongly about sending squad members to the National Memorial to honor their fallen colleague, Officer Tuan Le. Initially, the plan was for the Oakland Police Officer's Association (OPOA) to cover a portion of the cost, and for the remainder to be paid for out of the General-Purpose Fund (GPF – 1010). However, the plan could not be executed because there was a citywide travel ban and hiring freeze in place at the time.² Ms. Marshall stated that Area 3 Captain Alan Yu suggested they use Measure Z funds, because, as she recalls him saying, “there was money available in Measure Z’s travel account—it was just sitting there.” Officer Le occupied a Measure Z-funded position at the time of his death, which possibly caused OPD to believe that the use of Measure Z funds to attend his memorial was justified.³ Following this suggestion, Ms. Marshall remembers Captain Yu submitting a memo to

² The “travel ban” refers to a [memo from City Administrator Jestin Johnson](#) that placed a freeze on General Fund expenditures for “training and travel/conference requests.”

³ At the August 26, 2024 presentation to the SSOC, Deputy Chief Anthony Tedesco stated that he believes the Measure Z funds were used because Officer Le was a Measure Z-funded officer.

the City Administrator's Office (CAO) proposing the use of Measure Z funds instead of general funds for travel to the National Memorial. The CAO approved the proposal, and officers booked their own flights and accommodations and were reimbursed using Measure Z funds for expenses not covered by the OPOA.

Ms. Marshall further said that, following the concerns raised by SSOC commissioners at the August 26, 2024 meeting, she reached out to City Controller Stephen Walsh for clarification about the use of Measure Z funds. Mr. Walsh responded that he was not aware of any appropriation or ballot language authorizing such expenditures, concluding the expenses should be moved to the General Fund.

Ms. Marshall later explained to PEC staff over email that, based on this advice from the City Controller, the travel expenses had been moved to the General Fund and the money returned to the Measure Z fund. She provided PEC staff with a journal voucher showing these transactions. She also shared a screenshot showing that the Measure Z travel fund is full (or was, at the time of the screenshot), without any expenditures deducted—the result of the journal voucher transaction returning the funds. Ms. Marshall also noted that no Measure Z funds were used to pay for officers' travel to the California Peace Officers' Memorial in Sacramento. That statement is supported by the aforementioned documentation showing the Measure Z travel fund as full in the screenshot, without any recorded expenditures. It is also supported by the fact that in her original report to the SSOC in August of 2024, Ms. Marshall stated that \$12,000 of Measure Z funds were spent on travel to Washington D.C., and the journal voucher shows just over this amount being returned to the Measure Z fund.

During their investigation, PEC staff learned that an Internal Affairs investigation had been opened by OPD. PEC staff recently inquired about the status of OPD's Internal Affairs (IA) investigation into the incident. Acting Captain Bryan Hubbard stated (via email) that IA Case #24-1370 is closed, and that it did not find any violation of the OPD Manual of Rules (MOR).

APPLICABLE LAWS AND ANALYSIS

[City Council Resolution No. 85149](#) appeared on the ballot in November 2014 as the 2014 Oakland Public Safety and Services Violence Prevention Act—also known as Measure Z. It states that Measure Z funds may be used for the following purposes:

- a) Crime Reduction Teams (CRTs): Strategically geographically deployed officers to investigate and respond to violent crimes in identified violence hot spots using intelligence-based policing.
- b) Community Resource Officers (CROs): Engage in problem-solving projects, attend Neighborhood Crime Prevention Council meetings, serve as a liaison with city services teams, provide foot/bike patrol, answer calls for service if needed, lead targeted enforcement projects and coordinate these projects with CRTs, patrol units and other sworn personnel.

- c) Conduct intelligence-based violence suppression operations such as field interviews, surveillance, undercover operations, high visibility patrol, probation/parole compliance checks, search warrants, assist CROs projects, violent crime investigation, and general follow-up.
- d) Domestic violence and child abuse intervention: Additional officers to team with social service providers to intervene in situations of domestic violence and child abuse, including sexual exploitation of children.
- e) Sustaining and strengthening the City's Operation Ceasefire strategy, including project management and crime analysis positions.

Travel to honor fallen officers is not covered within the permissible uses of Measure Z funds. The expenditure was therefore improper, a conclusion that the City Controller also communicated to OPD through their Fiscal Services Manager.

In addition to being an improper use of Measure Z funds, former PEC staff also screened the expenditure for a potential misuse of city resources violation. OPD regularly sends officers to attend memorials for fallen comrades, and the PEC generally considers such activity to serve a City purpose. Accordingly, expenditures of this type do not ordinarily trigger review for a potential GEA violation. In this instance, however, two factors created atypical circumstances that led former PEC staff to review the matter as a possible misuse of City resources violation. First, the expenditure constitutes an improper use of Measure Z funds. And second, the expenditure (and resulting travel) occurred while a citywide spending moratorium was in effect.

Section 2.25.060(A)(1) of the Government Ethics Act (GEA) provides: "A Public Servant may not use or permit others to use public resources for a campaign activity or for personal or non-City purposes not authorized by law." The relevant question is therefore whether the circumstances surrounding this expenditure transformed travel that would ordinarily serve a City purpose into the use of public resources for a "non-City purpose not authorized by law."

The first special circumstance is the travel's improper funding through Measure Z. This is a clear error that requires redress. But it is a error in funding-source, that does not by itself establish that the underlying travel served a non-City purpose. The important distinction is between the purpose of the expenditure and the source of funds used to pay for it. The fact that Measure Z does not authorize the travel does not mean no such authorization exists. Travel to a memorial ordinarily does serve a City purpose, and that remains true here. The available evidence suggests this is a situation in which an improper funding source was used to pay for travel that serves a City purpose.

The second circumstance under consideration is the spending moratorium that was in effect at the time of the expenditure. The spending moratorium placed a freeze on general purpose fund expenditures as follows:

GPF Freeze of Training and Travel/Conference Requests

Effective immediately, there is a citywide moratorium on all virtual and in-person professional training and conference requests funded through the General Purpose Fund unless mandated by your employment status or a regulatory requirement. This letter serves as official notification that virtual and in-person professional training and conference requests will not be authorized by the City Administrator from GPF resources for the remainder of the 2023-24 fiscal year through June 30, 2024, unless otherwise modified by the City Administrator.

OPD requested and obtained authorization from CAO to use Measure Z funds for travel to the memorial. That authorization does not make the use of Measure Z funds permissible. But it does provide further evidence that the travel itself was undertaken for an official City purpose rather than for the officers' personal benefit or some other non-City reason. Put a different way, the moratorium placed new restrictions on the general purpose fund, but did not establish that the activities subject to the freeze ceased to serve a City purpose.

Ultimately, although OPD misused Measure Z funds during a spending moratorium, the evidence does not establish a "non-City purpose not authorized by law" as required by GEA § 2.25.060(A)(1). On that basis, a misuse of City resources did not occur under that law. Nevertheless, the misuse of Measure Z funds constitutes at the very least an appearance of impropriety, which OPD should be careful to avoid.

RECOMMENDATION

Because there was no GEA misuse of City resources violation and OPD took action to correct the improper expenditure by returning funds to the Measure Z account, PEC staff recommend closing Complaint No. 24-30 without imposing a penalty. Staff do, however, recommend issuing an advisory letter to OPD. The letter would serve to educate OPD on the requirements of GEA regarding misuse of City resources and advise OPD to avoid even the appearance of impropriety in the future. This result is a fair and equitable response to a proven misuse of funds that was remedied very soon after the potential violation.



ENFORCEMENT UNIT
PUBLIC ETHICS COMMISSION
CITY OF OAKLAND
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Oakland, CA 94612
(510) 238-3593
TDD (510) 238-3254

TO: Public Ethics Commission
FROM: Tovah Ackerman, Enforcement Chief
DATE: August 12, 2026
RE: Case No. 26-08: In the Matter of the Oakland Police Commission, prepared for the September 16, 2026 Public Ethics Commission Meeting

Requested Action: PEC staff recommend the Commission adopt a finding that sufficient evidence of a violation of Sunshine Ordinance § 2.20.030(F)(1) exists and issue guidance to the Oakland Police Commission to agendize this matter for an immediate determination of whether to cure and correct the violation under Section 2.20.270(D)(2) of the Sunshine Ordinance.

FACTS AS STATED IN COMPLAINT

On April 15, 2026, the Public Ethics Commission (PEC) received formal complaint no. 26-08. The complaint alleges that between September 20 and 22, 2025, and on October 10, 2025, four members of the Oakland Police Commission (OPC) exchanged emails about the Militarized Equipment Ad Hoc Committee's recommendation regarding the Oakland Police Department's (OPD) divestiture of a BearCat armored vehicle. The four OPC members alleged to have participated in the conversations include Wison Riles, Sam Dawit, and Omar Farmer (the three members of the Ad Hoc Committee), and Ricardo Garcia-Acosta (the OPC Chair, not a member of the Ad Hoc Committee). The complaint further alleges that a commissioner revised the Ad Hoc Committee's recommendation on the matter.

ADDITIONAL INFORMATION GATHERED BY STAFF

The complaint included screenshots of the emails that the four commissioners sent to one another, as well as screenshots of the working documents that they were using to draft their recommendation. PEC staff followed up with the Complainant to corroborate the screenshots. In response, the Complainant forwarded the original emails depicted in the screenshots, as well as Word and PDF files of the Ad Hoc Committee's working document containing the BearCat replacement recommendation. These files fully corroborated the email communications, and partially corroborated the working document: they confirm its content but not who had access, as the Complainant was only able to share Word and PDF versions of the Google Document depicted in the complaint. However, because the content of the files align and the other screenshots were clearly corroborated, the preponderance of evidence suggests that the Complainant also accurately depicted the names of who could access the Google Docs and how they were shared.

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PEC staff also obtained documentation of a change to the Committee's recommendation about how the OPD should replace a BearCat armored vehicle. On October 10, 2025, the Ad Hoc Committee's working document contained the following recommendation (emphasis added):

"The Ad Hoc Committee recommends that OPD divest itself of the BearCat armored vehicle and not replace it with another BearCat. Instead, the City should consider purchasing **a non-paramilitary armored vehicle** consistent with what was agreed to in 2021 when funds become available."

The language included in the agenda materials for the November 20, 2025 OPC meeting appeared as follows (emphasis added):

"That, as previously agreed by the Commission and the Council, that the Department be directed to divest itself of the current Lenco G3 Bearcat and not replace it with another Lenco G3 Bearcat; but rather purchase **two armored vehicle that are a step-down from the Bearcat** when funds become available; OPD is currently requesting 2 new Lenco Tactical SUV's (smaller bearcat)."

On November 20, 2025, the OPC voted to adopt the recommendation as written in the agenda materials. According to a PEC staff interview with former Commissioner Omar Farmer, the adopted recommendation reflects the position that the non-member of the Ad Hoc Committee advocated for.

APPLICABLE LAWS AND ANALYSIS

Section 2.20.030(F)(1) of the Oakland Sunshine Ordinance prohibits serial communication among a majority of members of a local body. It states:

A majority of the members of a local body shall not, outside a meeting defined in this subsection F., use a series of communications of any kind, directly or through intermediaries, to discuss, deliberate, or take action on any item of business that is within the subject matter jurisdiction of the local body.

For the matter to constitute a violation of Sunshine Ordinance § 2.20.030(F)(1), the following must be true: (1) the OPC must be a local body; (2) a series of communications of any kind must have taken place; (3) the communication must have involved discussion, deliberation, or action on some item of business within the subject matter jurisdiction of the local body; and (4) the communication must have included a majority of members of the local body. Each element is assessed in turn.

1. The first requirement under Sunshine Ordinance § 2.20.030(F)(1) is that the entity qualify as a "local body." In § 2.20.030(E)(2), the Sunshine Ordinance defines a local body as "any board, commission, task force or committee which is established by City Charter, chapter or by motion or resolution of the City Council, the Oakland Redevelopment Agency or the Board of Port Commissioners." Because the OPC was established in § 604 of the Oakland City Charter, it

falls within the Sunshine Act's definition of a local body. *This element of Sunshine Ordinance § 2.20.030(F)(1) is therefore satisfied.*

2. The second element of Sunshine Ordinance § 2.20.030(F)(1) requires that there be a series of communications of any kind. Attachments to the complaint (corroborated as noted above) show two sets of communications. First, between September 20 – 22, 2025, the commissioners (Mr. Garcia-Acosta, Mr. Riles, Mr. Dawit, and Mr. Farmer) exchanged three emails and commented on a shared Google Doc. Second, on October 10, 2025, commissioners exchanged four emails with one another. Each set of communications involved multiple communications via email and, in the case of the September exchange, comments on a shared Google document. *This element of Sunshine Ordinance § 2.20.030(F)(1) is therefore satisfied.*
3. The third element of Sunshine Ordinance § 2.20.030(F)(1) requires that the communication involve discussion, deliberation, or action on some item of business within the subject matter jurisdiction of the local body. Both the September and October 2025 communications concerned the Ad Hoc Committee's recommendation about replacing the OPD's BearCat armored vehicle. This recommendation appeared on the agenda of the OPC's September 25, 2025 and November 20, 2025 meetings, placing the topic under discussion squarely within the jurisdiction of the OPC. *This element of Sunshine Ordinance § 2.20.030(F)(1) is therefore satisfied.*
4. The fourth element of Sunshine Ordinance § 2.20.030(F)(1) requires that the communication include a majority of OPC members. Section 604(c) of the City of Oakland Charter provides that the OPC "shall consist of seven (7) regular members and two (2) alternate members." The agenda and minutes from the September 25 and October 9, 2025 PEC meetings show that Alternative Commissioner Farmer was serving as one of the seven active commissioners during the relevant period. Evidence on record shows that Commissioners Garcia-Acosta, Riles, and Dawit, as well as Alternate Commissioner Farmer participated in the email September and October 2025 email conversations. *Because the emails included four of the seven OPC commissioners (including Alternative Commissioner Farmer who was serving as an active commissioner at this time), this element of Sunshine Ordinance § 2.20.030(F)(1) is satisfied.*

Based on the information provided in the Complaint and the corroborating evidence gathered by PEC staff, the communication that took place between these four commissioners in September and October of 2025 satisfies all elements required for a violation of Sunshine Ordinance § 2.20.030(F)(1).

RECOMMENDATION

Section 2.20.270(D) of the Oakland Sunshine Ordinance provides that when the PEC determines a violation has occurred, the local body (here, the OPC) "shall agendize for immediate determination whether to correct and cure the violation." The subject of the serial communications appeared on the agenda for the Special OPC Meeting on November 20, 2025 as "Recommendation A—Armored Vehicles

(Bearcat)” under Agenda Item VI. The minutes show that the OPC voted to adopt the ad hoc committee’s recommendation.

Enforcement staff recommend closure of case no. 26-08 with an official finding that four members of the OPC violated § 2.20.030(F)(1) of the Oakland Sunshine Ordinance, and issuance of an advisory letter to the OPC under Oakland Sunshine Ordinance § 2.20.270(F)(1). The advisory letter would direct the OPC to agendaize the matter for an upcoming meeting. The agenda item shall include a new opportunity for public comment, and for the OPC to determine whether to cure and correct the action taken on November 20, 2025.



Francis Upton IV, Chair
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Suzanne Doran, Executive Director

TO: Public Ethics Commission
FROM: Tovah Ackerman, Enforcement Chief
DATE: September 4, 2026
RE: Recommendations for Closures under the 2025 Complaint Backlog Strategy for the September 16, 2026 PEC Meeting

This memorandum presents abbreviated summaries of proposed case closures under the Complaint Backlog Strategy plan. Enforcement Staff carefully assessed each case according to a seven-point rubric and recommend the Commission approve closure.

Background

At the May 21, 2025, Commission meeting, Enforcement Staff presented a case closure plan based on a seven-point rubric to address a severe, longstanding complaint backlog and restore a functioning program with a sustainable caseload. (See [Enforcement Report re: Complaint Backlog Strategy for the May 21, 2025, Regular Meeting](#)).

The seven-point rubric used for assessing these cases for closure includes:

- Severity of the alleged violation;
- Impact of a Commission decision;
- Timing of alleged misconduct;
- Availability of a meaningful remedy;
- Level of investigative resources needed to substantiate a violation;
- Probability of substantiating allegations; and
- Availability of enforcement resources.

Under the Commission's [Mediation and Complaint Procedures](#), Commission Staff may recommend closure of a complaint if it falls within the Commission's jurisdiction but there is reason to support

CLOSURE RECOMMENDATIONS UNDER 2025 COMPLAINT BACKLOG STRATEGY – JULY 15, 2026

closure. Unlike dismissals after preliminary review, which are within Staff's discretion, the Commission must take formal action in order to close these complaints.

Staff Recommendation

Based on case analysis under the rubric criteria, Staff recommend the following case(s) to the Commission for closure as part of the 2025 Complaint Backlog Strategy:

1. ***Proposed Closure with No Action: In the Matter of Trevelyon Jones (Former Captain, Police Department) (PEC # 22-26).*** In December 2022, PEC staff received an allegation that Police Captain Trevelyon Jones appeared remotely at two community outreach meetings convened by ShotSpotter LLC during city-compensated time. Former PEC staff established that the meetings were, in fact, convened by a community group where ShotSpotter representatives were also guests, however there was no evidence to suggest a violation of the Government Ethics Act.

Accordingly, PEC Staff recommends that the Commission close PEC Case No. 22-26 with no further action.

2. ***Proposed Closure with Advisory Letter: In the Matter of Former Oakland Police Commissioner Regina Jackson et al. (PEC # 24-06).*** In April 2024, PEC staff received an allegation that the former Executive Director of the Community Police Review Agency (CPRA) was being retaliated against for conducting an investigation into members of the Oakland Police Department (OPD) and for reporting potentially unlawful conduct. While this matter is of a serious nature, the allegations came in at a time when substantive conflict was happening between Commissioners and staff of the CPRA. That conflict has now ended, and, at this time, the Commissioners and staff who were involved are no longer on the board or employed with the CPRA. Given that fact, along with the extent of investigation this would require as well as the low probability of establishing clear evidence that a violation occurred, this matter should not be pursued by the PEC. However, this case does present an opportunity for the PEC to educate current OPC members on ethics laws, including rules such as misuse of position and conflict of interest laws.

Accordingly, PEC Staff recommends that the Commission close PEC Case No. 24-06 with an advisory letter.



**CITY OF OAKLAND
PUBLIC ETHICS COMMISSION**

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Suzanne Doran, Executive Director

Public Ethics Commission Commissioner Vacancy Announcement September 2026

Apply for a Seat on the Public Ethics Commission

The City of Oakland Public Ethics Commission (PEC) is now accepting applications to fill a PEC-appointed seat on the Commission's seven-member volunteer citizen board. The term is for three years and would begin on January 22, 2027, and expire on January 21, 2030.

Application deadline: October 30, 2026.

Please note: All applicants must attest in their application that they have attended at least one PEC meeting. For more information on how to attend a PEC meeting for this application process please check the upcoming meetings on our [website](#) or contact ethicscommission@oaklandca.gov.

Background

The Public Ethics Commission is a seven-member board of volunteers dedicated to the City Charter goal of ensuring **fairness, openness, honesty, and integrity** in City government, and to promote a more **inclusive, representative, and accountable** democracy in Oakland. Guided by duties and authority set out by City ordinance, the Commission works to achieve its goals through a three-pronged approach that focuses on prevention, enforcement, and collaboration. Specifically, the following local laws are the foundation of the Commission's responsibilities in three general areas – campaign finance, ethics, and transparency:

- Oakland Government Ethics Act
- Oakland Campaign Reform Act
- Conflict of Interest Code
- Sunshine Ordinance
- Oakland's Fair Elections Act (Democracy Dollars)
- Lobbyist Registration Act
- Oakland's False Endorsement in Campaign Literature Act

Commissioner Requirements

A Commission member must be an Oakland resident and registered to vote in Oakland. Four Commissioners are appointed by the full Commission on a rotating schedule. Three Commissioners are appointed respectively by the Mayor, City Attorney, and City Auditor. All applicants must attend a PEC meeting (observed in-person or via Zoom) prior to their appointment. For upcoming meetings, visit www.oaklandca.gov/pec.

Commissioners serve a three-year term and are expected to participate in monthly meetings and occasional subcommittee meetings to make final decisions on enforcement matters, serve as a neutral judge in cases that require an administrative hearing, and provide guidance to staff in the conduct of the Commission's business. Commissioners typically volunteer five to ten hours per month. Commissioners receive no compensation and may serve no more than two consecutive three-year terms.

During their tenure a Commissioner may not:

- Be a City employee or City contractor while on the Commission and for a period of one year after their service ends.
- Be employed by or receive gifts/compensation from City or OUSD elected officials while on the Commission.
- Be a registered City lobbyist, or be required to register as a City lobbyist, or be employed by or receive gifts/compensation from a registered City lobbyist while on the Commission and for a period of one year after their service ends.
- Run for Elected Office in a jurisdiction that intersects with the geographic boundaries of Oakland while on the Commission.
- Endorse, support, oppose, contribute to, or volunteer or work on behalf of any candidate or ballot measure in a City or OUSD election while on the Commission (except as specified).
- Serve as an officer or employee of a political party while on the Commission.

Desired Skills and Abilities

Commissioners should represent a variety of backgrounds and professions so that the Commission, as a whole, provides a well-rounded perspective on Oakland City government, law, community-building and engagement, leadership, program administration, enforcement, and policies related to campaign finance, ethics and transparency. Specifically, a Commissioner should be able to do the following:

- Read, analyze, and understand written information and make decisions based on the information;
- Listen to public input, assess community needs, and make decisions about how to best accomplish the Commission's goals;
- Understand the context in which the Commission operates within City government and the broader community;
- Communicate orally during a public, televised meeting;
- Collaborate effectively with other Commissioners, the public, City officials, and staff;
- Interpret rules, laws and policies and objectively apply a rule to a particular set of facts;
- Identify personal conflicts of interest or other factors that could lead to actual or perceived improper influence;
- Serve with fairness, openness, honesty, and integrity;
- Complete a Form 700 – Statement of Economic Interests annually, disclosing information such as one's financial interests in investments, property, income, and gifts;
- Adhere to all Commission-related laws and policies, including but not limited to the Oakland City Charter, Oakland Government Ethics Act, Oakland Sunshine Ordinance, Commission Complaint Procedures, and Commission Operations Policies (by-laws).

Selection Process

New Commissioner appointments occur every year and are generally announced in the Fall. To apply for a vacancy, attend an upcoming Commission [meeting](#) and submit an application using the link below.

Apply online: [PEC Commissioner Application](#)

Following the application deadline, a subcommittee of Commissioners will review applications and conduct oral interviews of applicants. The top candidates will be forwarded for an interview and selection by the full Commission at the Commission's public meeting.

For more information

For more about the Public Ethics Commission, visit us online at www.oaklandca.gov/pec. We also suggest you attend a City Council meeting in person or watch one on local television (Channel 10). For more information about the Commission or this position, contact us at ethicscommission@oaklandca.gov or (510) 238-3593.

DEADLINE: OCTOBER 30, 2026

Item 08 - Commissioner Recruitment

APPLY FOR A SEAT ON THE PUBLIC ETHICS COMMISSION

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PASSIONATE ABOUT GOVERNMENT INTEGRITY?

JOIN OUR TEAM!



The Public Ethics Commission (PEC) is an independent commission made up of Oakland residents dedicated to ensuring Oakland government is open, honest, fair, and trustworthy. The Commission acts as a guiding light and a watchdog to safeguard compliance with government ethics, campaign finance, lobbying, and transparency laws. The Commission:

- Educates residents and City staff on ethics-related issues
- Conducts investigations, audits and public hearings
- Imposes fines and penalties as part of enforcement activities
- Provides policy direction to Commission staff

HELP LEAD THE PUBLIC ETHICS COMMISSION TO EVEN GREATER IMPACT

Want to learn more?
Visit: www.oaklandca.gov/pec

Deadline: October 30, 2026

To apply online scan here:



For inquiries, contact: (510) 238-3593
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Francis Upton IV, Chair
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Suzanne Doran, Executive Director

TO: Public Ethics Commission
FROM: Suzanne Doran, Executive Director
DATE: September 3, 2026
RE: Executive Director's Report for the September 16, 2026, Regular PEC Meeting

This memorandum provides updates regarding Public Ethics Commission (PEC or Commission) programs and operations, such as budget, staffing, and legislative and policy initiatives since the last Commission meeting, as well as a summary of major 2026 Commission projects and initiatives.

Commissioner Recruitment

One Commission-appointed seat expires in January 2027. Distribution of the Commissioner recruitment announcement and application started in August and will continue through the October 30 application deadline. The [Commissioner recruitment webpage](#) includes information about the Commissioner role, desired skills, and links to the online application, as well as information about the Commission. Outreach channels include the Commission website, targeted email distribution lists, social media, and digital ads in local press outlets. In addition, staff distributes recruitment materials at in-person outreach activities. After the application period closes, qualified applicants will be invited to appear before the full Commission for selection at its January 2027 meeting. In addition, the City Attorney-appointed Commission seat is also up for reappointment in January. Persons interested in the City Attorney appointment are encouraged to contact the City Attorney's office directly for information on their appointment process.

Staffing

In August, staff completed hiring for the Commission's last two vacancies. Staff is delighted to announce the appointment of former PEC staffer **Ana Lara Franco** to the position of Ethics Analyst II, and the appointment of provisional analyst **Bhawna Chowdhary** to a permanent Ethics Analyst I position. Congratulations, Ana and Bhawna!

Commission Meetings

Strategic Planning Retreat. In October, the Commission will convene for a “retreat” to conduct team development, assess Commission accomplishments and current context, participate in strategic visioning, and identify key opportunities and priorities for the next two to three years. The format for these planning retreats is typically less formal than a regular Commission meeting, while still adhering to public meeting rules. Staff anticipates scheduling the special meeting for October 21.

PEC Legislation

Current activities related to implementation and administration of laws in the Commission’s jurisdiction include:

Limited Public Financing Program. On August 20 and August 21, Staff provided training for candidates interested in participating in the Limited Public Financing Program. A total of three candidates completed the required LPF training to learn about program requirements and the reimbursement process.

The deadline for candidates to opt-in to the LPF program was August 24. A total of three candidates opted-in to the 2026 LPF program. The next step is for participating candidates to submit their LPF application demonstrating that they have met the eligibility requirements, along with their initial reimbursement request, by September 18.

Measure W – Democracy Dollars Implementation. Although the FY 25-27 budget did not include funding for Democracy Dollars vouchers for the 2026 election, staff continued to make progress toward implementation milestones. In August, staff met with vendor MapLight to discuss the development schedule for the software platform to administer the Democracy Dollars program. Staff anticipates the 12-month design, development, and user-testing process to commence in early 2027.

Major 2026 Projects or Initiatives

The chart below provides a high-level overview of PEC projects and initiatives that are either statutory requirements or obligatory core services that require substantial staff time in 2026:

Quarter	Month	Commission Items	Major Staff Activities
1	January	Elect Chair and Vice Chair ✓ PEC-appointments to fill vacant seats ✓ Democracy Dollars Outreach Strategy Report presented ✓	• New Commissioner onboarding • Chair and Vice Chair Orientation • City Council salary adjustment presented to Commission • Hybrid meetings implemented • Recruitment to fill staff vacancies conducted • Mid-cycle budget proposal and information submitted
	February	No meeting	
	March	City Council Salary Adjustment resolution adopted (Charter Sec. 202) ✓ City Attorney and City Auditor Salary Adjustment discussion ✓ Transparency ad hoc subcommittee established ✓	
2	April	Special Meeting – City Attorney Salary Adjustment resolution adopted (Charter Sec. 401(1)) ✓	• City Attorney and City Auditor salary adjustment presented to Commission

Quarter	Month	Commission Items	Major Staff Activities
		City Auditor Salary Adjustment resolution adopted (Charter Sec. 403(1)) ✓	• Mid-cycle budget adjustment process • Staff Performance Reviews completed • Dept. Equal Access Report completed • 5 positions filled, offers pending for remaining vacant positions • Updates to OCRA and LPF guides and training materials for 2026 elections published • Election-related education, compliance, and enforcement activities
	May	Review and comment on proposed Charter amendments to Sections 218, 301, 400, and 603 ✓ 2026 OCRA Guide published ✓ Democracy Dollars ad hoc subcommittee established ✓	
	June	No meeting	
3	July	Limited Public Financing Program Overview and 2026 Guide presented ✓ City Auditor’s Ethics Climate Survey Report ✓	• Onboarding and training for 4 new FTEs • Administer Limited Public Financing Program • Election-related education, compliance, and enforcement activities • Update the OpenDisclosure website for the 2026 elections • Draft 2023, 2024, and 2025 Annual reports/Strategic Planning Retreat planning
	August	Special Meeting – Announce funds available and fund distribution for 2026 election ✓	
	September	• Presentation/demo of PEC disclosure tools • Announce Commissioner application process	
4	October	Special Meeting – Strategic planning retreat	• Administer Limited Public Financing Program • Election-related education, compliance, and enforcement activities • Conduct Administrative Hearings • Recruit 4th ethics analyst • Recruitment to fill PEC-appointed Commission seat/Coordinate with City Attorney appointment
	November	• Adopt 2027 meeting schedule • Establish Commissioner Recruitment ad hoc subcommittee, refer applicants for full Commission interviews	
	December	No meeting scheduled	
TBD			
			• Initiate Democracy Dollars software development process – active development to start in early 2027



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Suzanne Doran, Executive Director

TO: Public Ethics Commission
FROM: Jelani Killings, Senior Analyst, Engagement and Compliance
DATE: September 2, 2026
RE: Engagement and Compliance Program Report for the September 16, 2026 Regular PEC Meeting

This memorandum provides a summary of major accomplishments in the Public Ethics Commission's (PEC or Commission) Engagement and Compliance program activities since the last regular meeting. Commission Staff compliance activities focus on enhancing compliance with disclosure rules and improving tools for public access to local campaign finance and other disclosure data. Engagement activities include training and resources provided to the regulated community, as well as general outreach to Oakland residents to raise awareness of the Commission's role and services.

Compliance with Disclosure Requirements

Commission Staff conducts filing officer duties as required by state and local law and aims to help candidates, lobbyists and City officials submit required disclosure reports and ensure residents can easily access campaign finance, lobbyist, and ethics-related data and information.

Campaign Finance Disclosure – On August 7, the Oakland City Clerk certified the candidates for the local positions on Oakland's November 2026 Election ballot. Eighteen candidates qualified to appear on the ballot and 16 have a registered campaign committee.

July 31 marked the campaign statement deadline for all registered committees for activity between January 1 and June 30, 2026. Commission staff performed a surface review of 54 campaign statements for missing information and potential contribution limit violations. Requests for amendments or clarifying information were issued to nine filers. Staff contacted non-filers to gain compliance.

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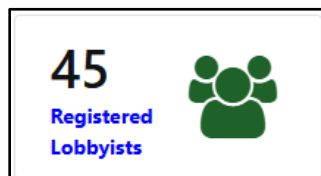
All candidates on the November 2026 ballot required to file have filed their statements. The following four committees were assessed late fees:

Committee Name	SOS ID	Type	Treasurer
Committee to Elect Jennifer Brouhard for Oakland School Board District 2, 2022	1452949	Candidate	Denevan, Graham
Kathryn Camp for Oakland School Board 2026	1490067	Candidate	Camp, Kathryn
Van Cedric Williams for OUSD, School Board, Seat 3, 2024	1427826	Candidate	Williams, Van Cedric
Brenda Grisham for Oakland Mayor 2026	1485058	Candidate	Grisham, Brenda

The first pre-election filing deadline for the November election is on September 24, 2026. All candidates on the November 2026 ballot are required to file. Candidates raising or spending \$2,000 or more file their campaign statements on FPPC Form 460. Candidates intending to keep their campaign under \$2,000 must file FPPC Form 470. Ballot measure committees and other recipient committees with fundraising or spending activity connected with the November ballot must also file for the pre-election deadline. After the September deadline, staff will screen campaign statements for untimely or unreported late contributions and independent expenditures and assess late fees as required.

Campaign statements are available to view and download at the PEC's [Public Portal for Campaign Finance Disclosure](#).

Campaign Non-Fileers – With program staff capacity returned to normal levels in August, Staff initiated a review of delinquent campaign filers and strategies to encourage voluntary compliance. The Commission's delinquent filers webpage is undergoing revision to include a simplified list of candidates and committees with delinquent reports and unpaid debts. The changes are intended to both provide greater access to up-to-date compliance status information to the Commission and the public and incentivize committees to take steps to come into compliance prior to enforcement action. Training content and guidance materials will be utilized to raise awareness among candidates and committees.



Lobbyist Registration Program – The Oakland Lobbyist Registration Act (LRA) requires lobbyists to submit quarterly reports disclosing their lobbying activities to ensure that the public knows who is trying to influence City decisions. July 31 was the deadline for quarterly lobbyist activity reports covering the period from April 1 through June 30, 2026.

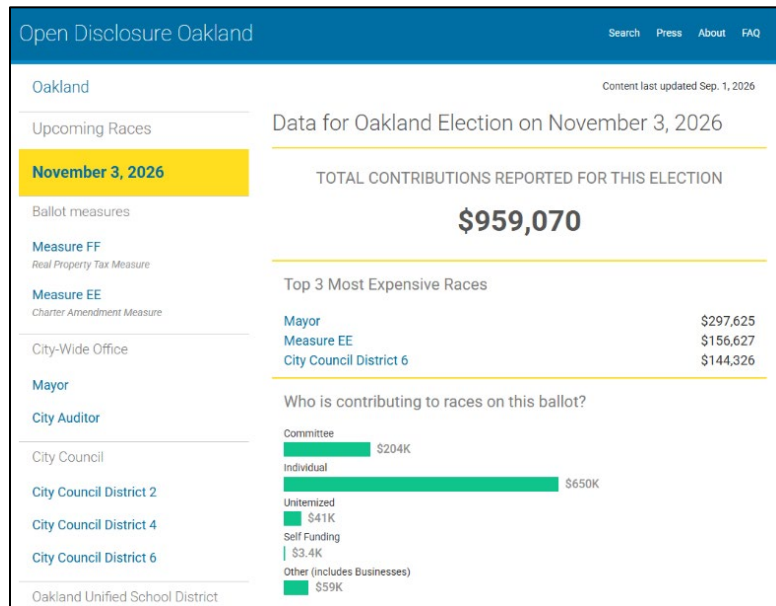
Forty-seven reports were filed and twelve lobbyists were assessed late fees. An up-to-date list of registered lobbyists and lobbyist activity reports with links to view and download individual reports is available at the Public Ethics Commission’s [Lobbyist Dashboard and Data](#) webpage.

Additionally, in August staff began work with the Information Technology Department (ITD) to improve the functionality and user experience with the PEC’s online lobbyist registration portal.

Behested Payment¹ Disclosure – During the months of July and August, the Mayor’s Office reported five behested payments totaling \$3,043,500 in solicited contributions for charitable, legislative or governmental purposes. Behested payment reports are available for public viewing through the [Public Portal for Campaign Finance Disclosure](#). A search for filings by a public official’s name will return any behested payment reports in the database submitted by the official (identified as Form 803).

Illuminating Disclosure Data

Open Disclosure Oakland – The [opendisclosure.io](#) campaign finance app is live with the data for the November 2026 election cycle. Open Disclosure Oakland, a nonpartisan tool, was developed by volunteers from [OpenOakland](#), a civic technologist group, in partnership with Commission staff to give all Oakland residents equal access to campaign finance data. The Open Disclosure Oakland website shows funds donated to both political candidates and ballot measure committees and provides clear summaries of money raised and spent as well as financial trends for each election. The website also includes a search function that makes campaign donation records



¹ “Behested payments” are payments made to a charity upon the solicitation of an elected official. Behested Payment Reports must filed with the campaign filing officer within 30 days of successfully soliciting \$5,000 or more on FPPC Form 803.

easy to search and sort and allows users to search campaign donors by name across multiple campaigns and elections.

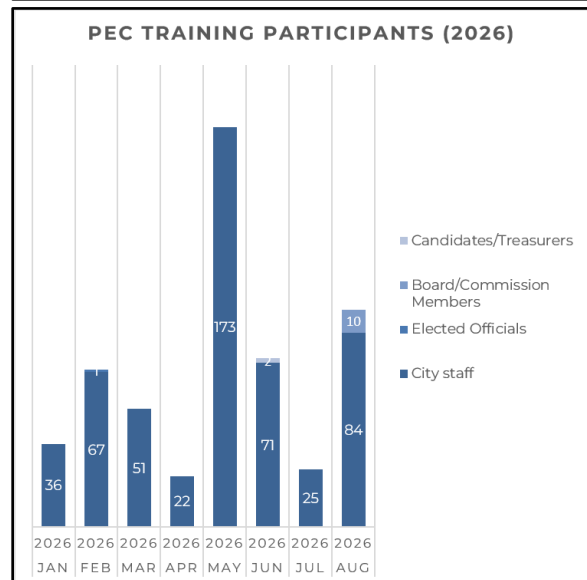
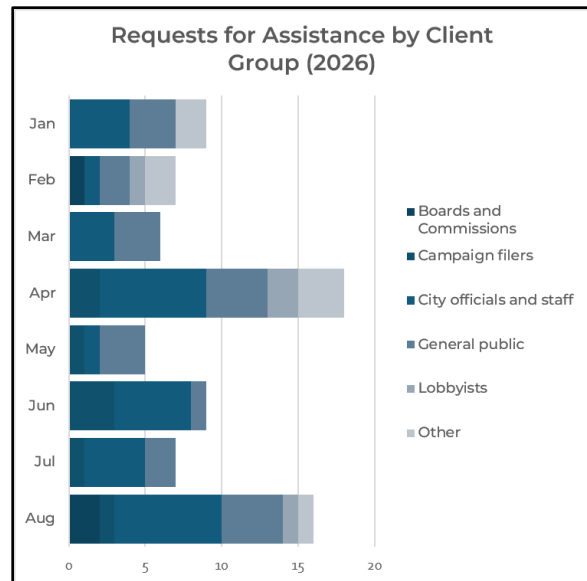
Open Disclosure Oakland is updated daily with data imported directly from the [City's campaign finance database](#) and includes a notification system that sends subscribers alerts about new campaign reports.

Advice and Engagement

Advice and Technical Assistance – Between July 2026 and the date of this report, Commission Staff responded to 23 requests for information, advice, or assistance regarding campaign finance, ethics, Sunshine law, or lobbyist issues.

Ethics Training – In addition to the PEC's online ethics trainings, Commission Staff regularly provide live trainings for City employees through the City's New Employee Orientation (NEO), Supervisory Academy, and upon request.

On August 25, PEC staff participated in a joint effort with the City Clerk and City Attorney to provide a comprehensive training for City Boards and Commissions staff liaisons. The training covered all relevant laws and responsibilities, including Sunshine and GEA requirements, pertaining to boards and commissions to ensure understanding and compliance. Staff shared about PEC resources, highlighted the PEC's online training for Form 700 filers, and emphasized the importance of maintaining an accurate list of board/commission members to ensure that filing and training requirements are being met.



On August 27, Commission staff presented to the Oakland Fund for Children and Youth Planning and Oversight Committee at the request of OFCY staff. Commission staff provided an overview of the Public Ethics Commission and the City’s conflict of interest rules.

Candidates and Campaigns – As part of our continuing campaign education efforts, staff issues routine guidance to ensure that candidates and committees are aware of local rules during this election season. In August, Staff sent out three bulletins and a notice covering the following topics:

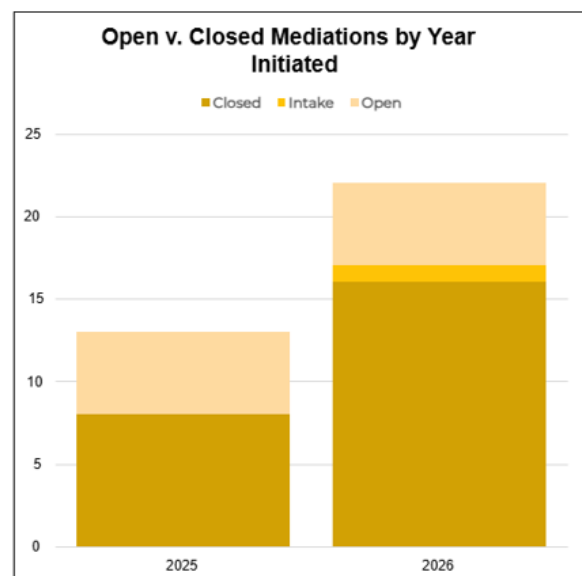
- A bulletin reminding campaign committees of the 24-hour reporting requirements for contributions and independent expenditures of \$1,000 or more.
- A notice to Department heads highlighting rules related to campaign activity and encouraging them to raise awareness among their staff.
- A citywide bulletin to remind City staff and officials about the rules related to campaign activity.
- A bulletin to remind campaign committees about contribution rules including the contractor prohibition.

General Outreach – On August 6, Commissioner Brandon distributed PEC materials at a National Night Out event in North Oakland. The event provided an opportunity to engage with community members and share information about the Commission.

On August 31, Staff tabled at the Mayor’s Clean and Safe Community Update event in Montclair to distribute Commissioner recruitment materials. The application period is now open and activities to publicize the opening will continue through the application deadline on October 30.

Mediation Program

Pursuant to the Oakland Sunshine Ordinance, the Commission conducts mediation of public records requests to City departments for records within the department’s control when the requested records are denied. Since the last Commission meeting, the Commission received eight new requests for mediation, and nine mediations were completed. This brings the total mediation caseload to 11.





Francis Upton IV, Chair
 Karun Tilak, Vice Chair
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 Tanya Bayeva
 L. Lawrence Brandon
 Angi Fisher
 Ryan Micik

Suzanne Doran, Executive Director

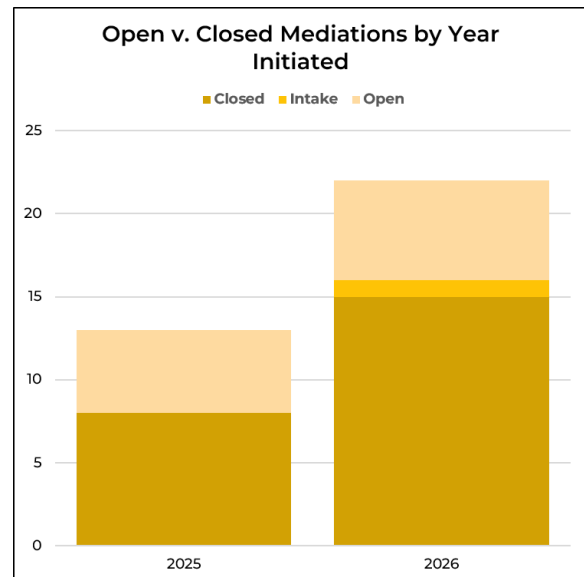
TO: Public Ethics Commission
FROM: Bhawna Chowdhary, Ethics Analyst
 Jelani Killings, Senior Analyst, Engagement and Compliance
DATE: September 1, 2026
RE: Mediation Program Report for the September 16, 2026, PEC Meeting

Pursuant to the Oakland Sunshine Ordinance, the Commission conducts mediation of public records requests made by members of the public to City departments for records within the department's control. Since the last Commission meeting, the Commission has received eight new requests for mediation, and nine mediations were completed. This brings the total mediation caseload to 11 open mediations.

Staff resolved the following cases:

1. In the Matter of the Office of the City Council (Mediation Case No. M2025-07).

On October 25, 2025, the Commission received a request for mediation alleging that the District 6 Council office failed to respond to a public records request and removed itself from the records request without providing the requested records. Staff initiated mediation on October 25, 2025. The District 6 Council office stated that all requested documents have been released. Subsequently, the District 6 Council Office closed the public records request. Staff contacted the Requestor to confirm if they had received the records and whether further mediation was requested. The requestor did not indicate interest in pursuing further mediation, and the mediation was closed with no further action.



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- 2. In the Matter of the Office of the City Clerk (Mediation Case No. M2025-11).** On November 12, 2025, the Commission received a request for mediation alleging that the City Clerk's office failed to respond to a public records request in a timely manner. Staff initiated mediation on November 12, 2025. PEC staff contacted the City Clerk's office and were told there were no relevant records for this request. Additionally, Staff contacted the Procurement, Contracts & Purchasing Bureau and confirmed with the Finance Department that there were no responsive records to the request. Staff notified the Requestor that the City Clerk had no additional responsive records. Subsequently, the mediation was closed with no further action.
- 3. In the Matter of the Department of Transportation (Mediation Case No. M2026-01).** On January 1, 2026, the Commission received a request for mediation alleging that the Department of Transportation failed to respond to a public records request and did not provide the responsive documents in a timely manner. Staff initiated mediation on January 1, 2026. The Department of Transportation stated that it had released all the responsive documents. Subsequently, the Department of Transportation closed the public records request. Staff contacted the Requestor to confirm if they had received the records and whether further mediation was requested. The requestor did not indicate interest in pursuing further mediation, and the mediation was closed with no further action..
- 4. In the Matter of the Office of the City Clerk (Mediation Case No. M2026-05).** On February 13, 2026, the Commission received a request for mediation alleging that multiple City offices failed to respond to a public records request and provide the responsive records in a timely manner. Staff initiated mediation on February 18, 2026. The Office of the City Clerk stated that it had released all the responsive documents. Subsequently, the Office of the City Clerk closed the public records request. Staff contacted the Requestor to confirm if they had received the records and whether further mediation was requested. The requestor did not indicate interest in pursuing further mediation, and the mediation was closed with no further action.
- 5. In the Matter of the Department of Transportation (Mediation Case No. M2026-09).** On May 15, 2026, the Commission received a request for mediation alleging that the Department of Transportation failed to provide responsive records, a status update, or a written explanation of search or review steps for the public records request. Staff initiated mediation on May 22, 2026. The Department of Transportation stated that it had released all responsive documents. Subsequently, the Department of Transportation closed the public records request. Staff contacted the Requestor to confirm if they had received the records and whether further

mediation was requested. The requestor did not indicate interest in pursuing further mediation, and the mediation was closed with no further action..

6. In the Matter of the Planning and Building Department (Mediation Case No. M2026-14).

On July 13, 2026, the Commission received a request for mediation alleging that the Planning and Building Department failed to respond to a public records request in a timely manner. Staff initiated mediation on July 15, 2026. On July 14, Planning and Building staff released four responsive records to the request. Staff reached out to the Requestor several times to confirm that the Requestor received the responsive documents. On August 17, the Requestor notified Staff via email that they did not want to pursue the mediation any further because they had received the responsive documents and withdrew their mediation request; therefore, this mediation was closed with no further action.

7. In the Matter of the the Human Services Department (Mediation Case No. M2026-15).

On August 3, 2026, the Commission received a mediation request alleging that copies of records that had been released in response to a public records request were inaccessible. After contacting the Requestor, they were able to find and open an accessible version of the requested documents. Consequently, this mediation was closed with no further action.

8. In the Matter of the Oakland Police Department (Mediation Case No. M2026-19). On August 11, 2026, the Commission received a mediation request alleging that the Oakland Police Department failed to release relevant documents. Staff contacted OPD, which stated that they could not provide any documents because the case was open. The records are not being disclosed under Gov. Code § 7922.000 because the public interest in nondisclosure outweighs the interest in disclosure, as established in City of San Jose vs Superior Court (1999) 74 Cal.App.4th 1008. Staff notified the Requestor. Consequently, this mediation was closed with no further action.

9. In the matter of the Human Resources Management Department (Mediation Case No. M2026-20). On August 12, 2026, the Commission received a mediation request alleging that the Human Resources Management Department (HRMD) failed to provide responsive documents to a public records request. Staff contacted HRMD, which stated that the requested records are exempt from disclosure under GC 7927.700 and cannot be released. After confirming with the City Attorney's Office, staff advised the Requestor that the records are exempt from disclosure. Consequently, this mediation was closed with no further action.



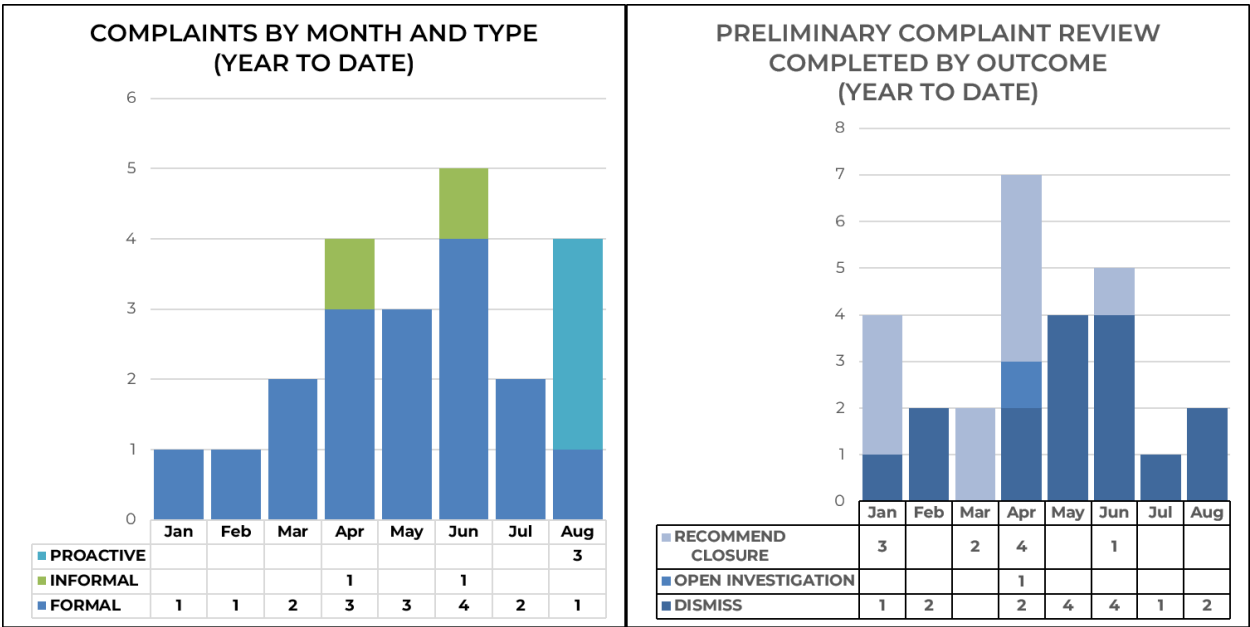
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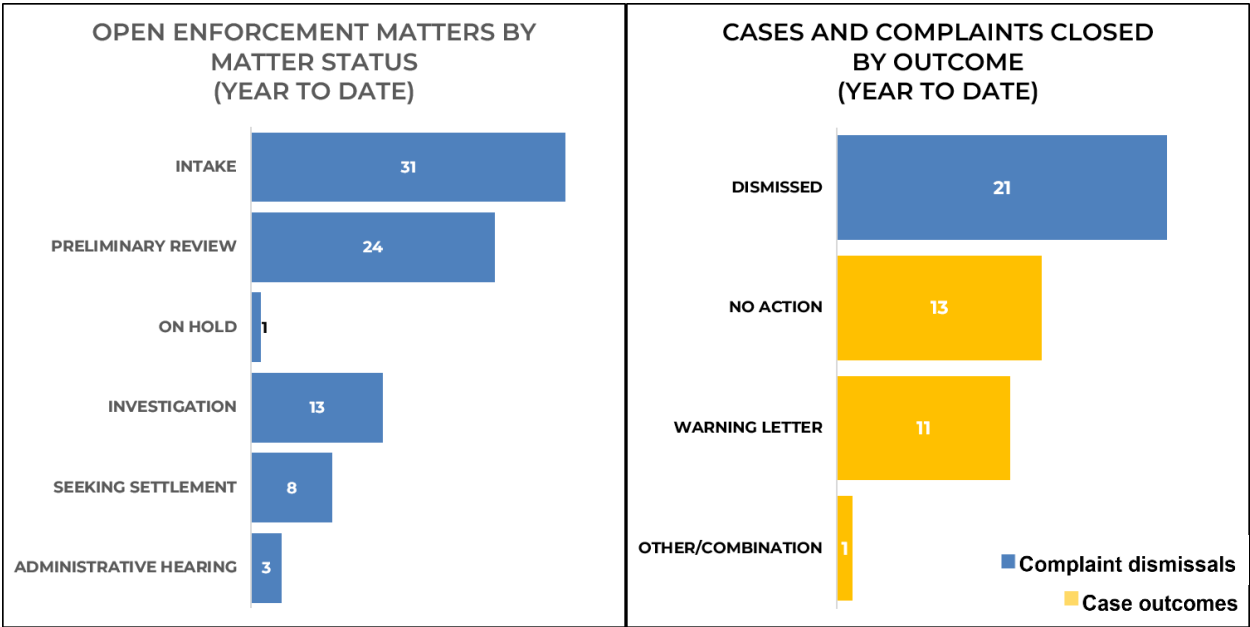
TO: Public Ethics Commission
FROM: Tovah Ackerman, Enforcement Chief
DATE: September 4, 2026
RE: Enforcement Report for the September 16, 2026, Regular PEC Meeting

Since the last Enforcement Program update submitted to the Commission on July 3, 2026, Commission staff received three formal (sworn) complaints and opened three proactive complaints. This brings the total Enforcement caseload to 80 open matters. Additionally, there are 31 informal matters under review that have not yet been dismissed or elevated and assigned a case number.

The charts below summarize complaints received, preliminary review of complaints completed by outcome, all open enforcement matters by complaint status, and cases and complaints closed by outcome.



ENFORCEMENT REPORT – SEPTEMBER 4, 2026



An overview of the complaint process as well as the Commission’s full Complaint Procedures and Penalty Guidelines can be found on our [Enforcement Program](#) webpage

A searchable table of closed complaints can be found on our [Enforcement Actions](#) webpage.

The following complaints have been dismissed:

- ***In the Matter of Linda Mora, Hearing Officer et al. (PEC # 26-10).*** In May 2026, PEC Staff received a formal complaint alleging deficiencies in the City of Oakland Housing and Community Development Department Rent Adjustment Program (RAP) tenant petition procedures and administration. PEC staff dismissed the complaint for lack of jurisdiction.
- ***In the Matter of Albert Merid et al. (PEC # 26-16).*** In July 2026, PEC staff received a formal complaint alleging that the Oakland Planning and Building Department has substantially increased fees associated with code enforcement and had restructured a previously efficient process into multi-step, multi-staff reviews. PEC staff dismissed the complaint for lack of jurisdiction.



PUBLIC ETHICS COMMISSION
CITY OF OAKLAND
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TDD (510) 238-3254

Transparency Ad Hoc Subcommittee

(ad hoc, created March 18, 2026)

Members: Commissioners Francis Upton IV (Chair), Luke Apfeld, Angi Fisher

July 30, 2026

Attendees:

Commissioners present: Francis Upton IV (Chair), Luke Apfeld, Angi Fisher

Staff present: Niels Thorsen, Ethics Analyst II

Minutes

Discussion

Further discussion on easing difficulties that accompany Public Records Requests. The Subcommittee will be convening a panel for public discussion at this year's CityCamp event on October 17. This will be a highlighted and scheduled panel discussion with the full panel (beyond the Subcommittee) yet to be determined. The Subcommittee has expressed interest in having the event feature input from attendees as well as unscripted discussion on how to better support records access and transparency.

Members interested in learning more about the anticipated CityCamp audience and overall format in order to better shape the panel discussion.

The subcommittee explored possible themes and objectives.

Working ideas included:

- Improving Access to Public Records
- Oakland and Transparency
- Transparency for the People

Next steps are to meet with the Information Technology Department. Staff is in the process of securing the meeting.

The subcommittee also expressed interest in a landscape analysis:

1. Examples of good transparency in other cities
2. Understanding where it is not working and where it could be better
3. Showing where it does work through good examples

Members discussed framing the October CityCamp panel more broadly than Public Records Requests (PRRs), focusing on how transparency can help residents better understand the work being accomplished throughout City government. Transparency that things are getting done in City Hall.

- Developing dashboards or other public-facing metrics that demonstrate work being completed by City departments.
- Sharing information that helps residents understand how City services are performing.
- Highlighting examples of transparency that already exist in other jurisdictions.

As one example, the City of San Diego's public dashboard displaying Police Department response times was discussed as a potential model for comparison.

However, the importance of keeping the discussion aligned with the Public Ethics Commission's mission and goals was also emphasized.