

**NOTICE OF PUBLIC MEETING
CITY OF PHOENIX
ETHICS COMMISSION**

Pursuant to A.R.S. Section 38-431.02, notice is hereby given to the members of the **ETHICS COMMISSION** and to the general public, that the **ETHICS COMMISSION** will hold a Hybrid meeting open to the public on **April 16, 2026, at 3:00 p.m.**

OPTIONS TO ACCESS THE MEETING

- **Call-in to listen** to the live meeting: Dial 1-415-655-0001, Enter meeting access code 2338 309 5878 and press # again when prompted for the attendee ID.
- **Observe the live meeting virtually**, by clicking on the following link and registering to join the meeting online:
<https://cityofphoenix.webex.com/weblink/register/r719c8ad0a58a119d2f8b01ad7ff0e24f>
- If you would like to attend in person at Phoenix City Hall, 12th Floor, Central Conference Room 200 W. Washington St., Phoenix, Arizona, **please RSVP to ethics.commission@phoenix.gov**.
- **Register to speak and/or submit a comment** on an agenda item:
 - Contact: Rebecca McCarthy
 - At: (602) 262-7526
 - Email: ethics.commission@phoenix.gov
 - By: 11:00 a.m. on April 16, 2026

Public Comment: If you wish to provide a written comment or speak at the meeting virtually or by phone, please submit a request to ethics.commission@phoenix.gov or call (602) 262-7526 no later than 11:00 a.m. on April 16, 2026. The email or phone call should include your first and last name, email address, the item number(s) and whether you would like your comment read into the record or if you wish to speak.

Please take notice that in order to preserve the integrity of the investigation process and pursuant to the City Code, all information related to an Ethics Inquiry is required to remain confidential until there is final action by the Commission; therefore, the Commission will not take public comment on Agenda items regarding pending ethics inquiries. Written comments may be submitted at any time to the Commission inbox at ethics.commission@phoenix.gov.

Additional information can be found at <https://www.phoenix.gov/ethics>.

Executive Session

The Ethics Commission may vote to convene into executive session (which will not be open to the public) pursuant to A.R.S. Section 38-431.03(A)(2) or (A)(3) for discussion or consideration of any items on the agenda, at any time during the meeting. The Ethics Commission must take action on an agenda item in open session. Items on the agenda may be discussed out of order unless they have been specifically noted to be set for a certain time.

The agenda for the meeting is as follows:

1.	Call to Order/Roll Call	Chair
2.	Approval of Meeting Minutes from March 19, 2026 Discussion and Possible Action	Chair
3.	Staff Update Information and Discussion	Staff
4.	Discussion of Inquiry Review Process Discussion and Possible Action	Chair
5.	Update on March 4, 2026, Alleged Open Meeting Law Violations Investigation Information Only	Chair
6.	Legal Opinion Requested involving the Request for Reconsideration Discussion and Possible Action	Chair
7.	Call to Public	Chair
8.	Future Agenda Items and Meeting Dates	Chair
9.	Adjournment	Chair

For further information, please contact Rebecca McCarthy at (602) 262-7526 or via electronic mail at ethics.commission@phoenix.gov. For reasonable accommodation or translation services, please contact Rebecca McCarthy at (602) 262-7526 or TTY: 7-1-1 as early as possible to coordinate needed arrangements.

4/13/2026

AGENDA ITEM 2

CITY OF PHOENIX ETHICS COMMISSION Summary Minutes March 19, 2026

Phoenix City Hall
12th Floor, Central Conference Room
200 W Washington St.
Phoenix, AZ 85003

Commission Members Present

Patricia Sallen, Chair
Peter Schirripa, Vice Chair
Ann Hart
Jose Samuel (Sam) Leyvas III
Cheryl Pietkiewicz

Commission Members Absent

1. Call to Order/Roll Call

Chairwoman Patricia Sallen called the meeting to order at 3:02 p.m. with Vice Chairman Peter Schirripa, Commissioner Ann Hart, Commissioner Sam Leyvas, and Commissioner Cheryl Pietkiewicz present.

Elizabeth Nillen, Commission Attorney, stated members of the public may speak for up to two minutes on agenda items, aside from agenda items on the pending complaints, and gave direction on appropriate decorum when providing comments.

2. Approval of Meeting Minutes from February 19, 2026

Commissioner Hart made a motion to approve the minutes of the February 19, 2026, Ethics Commission Meeting. Vice Chairman Schirripa seconded the motion.

Chairwoman Sallen introduced the public speaker, Tamara Weaver.

Ms. Weaver requested the Commission clarify why a Republican is required to fill the vacancy, noting that City Council is intended to be non-partisan and asking for more information about the party affiliation.

Commission Attorney Nillen explained the rules for appointments to the Commission are delineated by party.

The motion passed unanimously 5-0.

3. Staff Update

Deputy City Manager David Mathews noted there are a few updates from staff and introduced Special Projects Administrator Rebecca McCarthy to provide updates on the website.

Special Projects Administrator McCarthy provided an update on the status of the recruitment. She stated the application deadline is March 20 and no eligible applicants have been received. She confirmed the application will be extended through April 20.

Chairwoman Sallen noted the applicant must be a Republican and confirmed the individual can reside in any of the City Council Districts.

Chairwoman Sallen introduced the public speaker, Tamara Weaver.

Ms. Weaver stated it is important to ensure whoever fills the position is independent from the City, such as the person does not have corporate affiliations or financial ties to the City.

4. **Discussion of Inquiry Review Process and Citizen Petition**

Chairwoman Sallen noted this item is an ongoing discussion from previous meetings and introduced Special Projects Administrator McCarthy to provide the update.

Special Projects Administrator McCarthy reported that staff were asked to review ethics oversight boards in other jurisdictions and have drafted a scope for the Commission's review based on prior discussions. The scope covers areas such as identifying similar-sized jurisdictions, referencing governing documents, submission processes, confidentiality and transparency practices, conflict of interest language, withdrawal procedures, and sanctions or fines for both Complainants and Respondents. She asked for feedback from the Commission.

Commissioner Leyvas suggested to review the scope of sanctions generally, not just for frivolous complaints. He asked why we are highlighting if a jurisdiction's board reviews complaints against employees.

Special Projects Administrator McCarthy explained that, since the City of Phoenix Ethics Commission only reviews complaints against elected and appointed officials, this is an important distinction to note when staff are asked to report annual complaint numbers from other jurisdictions.

Commissioner Leyvas asked for staff to review the jurisdiction's staffing support and resources, noting that Philadelphia has general counsel and investigators.

Chairwoman Sallen introduced the public speaker, Tamara Weaver.

Ms. Weaver stated it is important to include the public in the review process. She indicated she will submit written feedback.

5. March 4, 2026, Alleged Open Meeting Law Violations Investigation

Chairwoman Sallen stated the Commission received an open meeting law complaint, sent from the County Attorney's Office. She summarized the two allegations in the complaint. She noted the first allegation stated that, during the December 2024 meeting, the Commission took substantive action while in executive session and the second allegation stated that, during the January 2025 meeting, the Commission entered into executive session for improper purposes. She noted the complaint was dated March 4, 2026, and the deadline for response is 30 days.

Chairwoman Sallen stated the Commission needs to discuss the item in executive session to receive advice from the Commission's Attorney on how to respond. She indicated that both Agenda Items 5 and 6 are matters that may warrant entering executive session for consultation with legal counsel.

Chairwoman Sallen introduced the first public speaker, Jeremy Thacker.

Mr. Thacker noted this is his complaint from last year. He believes there is a misunderstanding of what executive session and legal advice is for. He stated executive session is for legal advice, not discussion amongst the Commission, and it is not only the formal action that needs to occur outside of executive session.

Chairwoman Sallen stated she is inclined to enter executive session to get advice from the Commission Attorney on how to respond.

Chairwoman Sallen introduced the next public speaker, Tamara Weaver.

Ms. Weaver asked if the Commission plans to enter into executive session, could they provide an estimated time of when the public should rejoin the Webex.

Chairwoman Sallen stated they are unable to provide an estimated time as it depends on the length of discussion needed.

Commissioner Leyvas noted that while he is disappointed it took a year, he sees the value in this process. He explained that if the Commission's actions are assessed as being out of alignment, the information will be useful for ensuring they serve the public interest properly. He also stated it is important to get opinions on what is acceptable or not acceptable, especially from those responsible for these decisions.

Chairwoman Sallen asked if there was a motion to enter into executive session to receive legal advice on Agenda Items 5 and 6.

Commissioner Leyvas made a motion to move into executive session pursuant to A.R.S. Section 38-431.03(A)(2) or (A)(3) for discussion as it relates to the complaints and for the purpose of receiving legal advice from the Commission Attorney related to Agenda Items 5 and 6. Commissioner Pietkiewicz seconded the motion, which passed unanimously 5-0.

The Commission entered Executive Session at 3:19 p.m.

The Commission returned from Executive Session at 4:35 p.m.

Chairwoman Sallen asked if there was a motion on Agenda Item 5 on how the Commission proceeds with this letter.

Commissioner Pietkiewicz made a motion to request the Commission Attorney to address the matter.

Commission Attorney Nillen asked Commissioner Pietkiewicz if she would like the motion to include that the Commission Attorney proceed with filing a response to the investigative demand letter.

Commissioner Pietkiewicz responded yes.

Commissioner Leyvas seconded the motion, which passed unanimously 5-0.

6. Review of Current Complaints

Chairwoman Sallen introduced the item and noted there are three inquiries on the agenda.

Chairwoman Sallen stated the respondent in EC-25-18 submitted a request for reconsideration of the decision from last month's meeting, when the Commission voted to move forward with the investigation.

Commissioner Leyvas made a motion to table the request for reconsideration from the Respondent in EC-25-18 and instruct the Commission Attorney to prepare written legal advice for the questions raised in the request. Commissioner Pietkiewicz seconded the motion.

Chairwoman Sallen called for the roll call vote. The motion passed 5-0 by the following roll call vote.

Yes: 5 – Chairwoman Sallen, Vice Chairman Schirripa, Commissioner Hart, Commissioner Leyvas, and Commissioner Pietkiewicz

No: 0

The request for reconsideration from the Respondent for EC-25-18 will be tabled and the Commission Attorney will prepare written legal advice.

Chairwoman Sallen stated there is no action to take on EC-25-01 and EC-25-06.

7. Call to Public

Chairwoman Sallen introduced the public speaker, Tamara Weaver.

Ms. Weaver was unavailable to comment.

8. Future Agenda Items and Meeting Dates

Commissioner Hart requested a future agenda item to discuss a withdrawal timeline and define how the Commission will handle withdrawn complaints.

Commission Attorney Nillen asked if this topic would be appropriate to add to the discussion on the review process.

Commissioner Hart agreed to either option, provided there is an opportunity for further discussion.

Special Projects Administrator McCarthy stated she will add the topic to the scope of research to identify if other jurisdictions have a timeline for withdrawal.

Chairwoman Sallen confirmed the next meeting date is April 16.

Chairwoman Sallen checked again if Ms. Weaver was available to provide her public comment.

Ms. Weaver was still unavailable.

9. Adjournment

Chairwoman Sallen adjourned the meeting 4:47 p.m.

Ethics Commission Research – Comparable Jurisdictions

DRAFT

As of April 10, 2026

Introduction

The report provides a high-level overview of Ethics Commissions and Boards across selected municipal jurisdictions. The analysis uses the City of Phoenix as the baseline for comparison and includes the following three cities: San Diego, California; Philadelphia, Pennsylvania; and San Antonio, Texas.

The purpose of the report is to offer reference materials and contextual information for the City of Phoenix Ethics Commission as it considers potential revisions to its Rules of Procedure and related processes.

The information presented is intended as a preliminary review prepared by staff and does not constitute a comprehensive or fully developed comparative analysis. These three cities represent a limited sample and are not intended to reflect the full range of approaches used by ethics bodies nationwide.

This research is based exclusively from official municipal and state sources, as well as other publicly accessible materials, including, but not limited to:

- Municipal codes and charters
- Ethics commission websites
- Published bylaws, rules of procedure, and complaint forms
- Annual reports and other summaries

Scope for Ethics Commission Research

1. **Identify comparable jurisdictions:**
 - a. U.S. city or county governments with populations between 1 and 2 million
2. **For each jurisdiction, identify:**
 - a. Governance structure (Mayor–Council or Council–Manager)
 - b. Whether ethics, conduct, integrity, or similar complaints involving elected or appointed officials are reviewed by a commission, board, or other oversight body
 - c. Number of members serving on the identified commission or board
 - d. Whether employee complaints are handled by the same body or by a separate mechanism
 - e. Annual volume of complaints, if publicly available
 - f. Links to official sources (municipal code, bylaws, ethics policies, official webpages, published procedures, forms, etc.)
3. **Analyze oversight documents to summarize the following:**
 - a. Complaint submission process and required steps
 - b. Verification requirements (e.g., notarization, sworn statement, penalty of perjury)
 - c. Anonymous submission policies
 - d. Accepted submission channels (online portal, email, printed form, mail, in-person, etc.)
 - e. Confidentiality and transparency practices
 - f. References to conflicts of interest or the appearance of impropriety
 - g. Procedures for withdrawing a complaint or inquiry
 - h. Sanctions, fines, or corrective actions for respondents
 - i. Penalties or processes for frivolous complaints for complainants
 - j. Commission or board resources, including staffing / administrative support and budget

Baseline Jurisdiction: Phoenix, Arizona

Government Structure

- Population: 1.67M ([United States Census Bureau 2024 – Phoenix, Arizona](#)).
- Form of Government: Council–Manager.
- Charter: [City of Phoenix City Code and Charter](#).

Oversight Body

- [City of Phoenix Ethics Commission](#): Ethics Commission is authorized to receive allegations of ethical violations, investigate, take testimony, and engage in any other action to the extent permitted and established by law to oversee the investigation and enforcement of the gift policy and conflicts of interest pursuant to Phoenix City Charter Chapter XI, Sec. 1 (Title 38, Article 8, Arizona Revised Statutes) related to elected officials and board and commission members.
- Relevant Links:
 - [Website](#)
 - [Phoenix City Code Sec. 2-53 City of Phoenix Ethics Commission](#)
 - [Ethics Commission Bylaws](#)
 - [Ethics Commission Rules of Procedure](#)

Composition

- Five-member Board comprised of two democrats, two republicans and one independent.
- [Commission Members](#)

Employee Complaints

- Employee complaints are handled separately by the City Manager and the Integrity Line.

Complaint Volume

- Per the [website](#), eight historical complaints were reviewed (2019–2023) and 21 inquiries were received in 2025.

Submission Requirements

- Ethics Commission complaint procedures per the [Rules of Procedure](#).
- [Ethics Request for Inquiry Form](#): Requires name and contact information of person filing inquiry (Complainant), name of Respondent and other details, requires the Complainant to provide written statement of the alleged ethics violation and requires supporting documents. The form requires the inquiry to be notarized and signed under penalty of perjury. The document must be filed with the City Clerk (in person or via email); if initially emailed, the original document must be delivered or mailed to the City Clerk.

Anonymous Submissions

- Per the [Rules of Procedure](#), Rule 4(c), the City Clerk “must not accept the submission of an anonymous Request for Inquiry”.

Confidentiality and Transparency

- Per the [Rules of Procedure](#), Rule 4(a), “for the period that begins with the assignment of the matter number by the City Clerk through the Ethics Commission’s recommendation for action to Council, the Request for Inquiry must solely be referenced by matter number, and the Request for Inquiry, investigation and any Ethics Commission proceedings related to its evaluation must remain confidential.”
- The agendas, minutes, and results are posted on the Commission’s [website](#).

Conflicts of Interest and Appearance of Impropriety

- Conflicts of interest are referenced under [Phoenix City Code §2-52](#), [Phoenix City Charter Chapter XI](#) and [Arizona Revised Statutes Title 38, Chapter 3, Article 8](#).

Withdrawal Procedures

- No withdrawal procedures documented.

Sanctions and Frivolous Complaints

- Per the [Rules of Procedure](#), Rule 8, the Commission may recommend sanctions against the respondent: censure, a sanction up to \$500 for each violation or removal from office if the violation refers to a Board member.
- Per the [Rules of Procedure](#), Rule 9, frivolous complaints may result in sanctions of up to \$500 for each violation and may be ordered to pay reasonable attorney’s fees and costs incurred by the Respondent.

Resources

- Staff: Support from City Clerk, Commission Recording Secretary (Deputy City Manager) and one staff member. Commission may appoint outside investigator.
- Budget: Not specified online.

Comparable Jurisdiction: San Diego, California

Government Structure

- Population: 1.44M ([United States Census Bureau 2024 – San Diego, California](#)).
- Form of Government: Strong Mayor.
- Charter: [City of San Diego, City Charter](#).

Oversight Body

- **San Diego Ethics Commission**: San Diego Ethics Commission's jurisdiction only extends to laws covering campaign disclosures, campaign contributions and expenditures, disclosures of City officials' economic interests, financial conflicts of interest, and the lobbying of City officials is limited to City's campaign, lobbying, and ethics laws.
- Relevant Links:
 - [Website](#)
 - [Ethics Ordinance and related Fact Sheets](#)
 - [Jurisdiction of the Ethics Commission](#)
 - [San Diego Municipal Code, Chapter 2: Government, Article 6: Board and Commissions, Division 4: Ethics Commission, Sections 26.0401 to 26.0456](#)
 - [Investigative Program Overview PPT](#)

Composition

- Seven Commissioners
- [Commission Members](#)

Employee Complaints

- The Commission reviews complaints against elected officials and members of their staffs, as well as every unclassified City employee, consultant, and member of a City board or commission who files a Statement of Economic Interests (SEI).

Complaint Volume

- **Annual Report**: Includes an overview of their duties and responsibilities, commissioners, and their five programs: Audit, Education and Advice, Training and Compliance Program, Enforcement Program, and Legislative Program.
- 2025: Annual Report noted a total of 162 Formal and Informal Complaints were received. 109 Informal Complaints and 33 Formal Complaints were processed but closed before investigation, meaning the complaints either did not contain sufficient information to support an allegation of a violation or the alleged violation fell outside the Commission's jurisdiction. 20 Informal complaints were investigated.

Submission Requirements

- [Formal Complaints](#): Includes contact information, information about the Respondent, type of allegation (selection of set of laws), description of facts, and other relevant information or documentation. Must be certified under penalty of perjury.
- [Informal Complaints](#): Complaints may be anonymous. There are only three required sections: information about the Respondent, type of allegation (selection of set of laws), and a description of facts.

Anonymous Submissions

- Allowable under Informal Complaints, not under Formal Complaints.

Confidentiality and Transparency

- Per the [San Diego Municipal Code, §26.0414\(e\)](#), “Subject to the California Public Records Act and City Charter section 216.1, no record or information contained in any investigation or investigatory file shall be disclosed to any person other than a respondent or his or her representative, the Commission’s enforcement staff, a court, a law enforcement agency, or otherwise as necessary to the conduct of an investigation, prior to a final determination as to its merit.”
- See also [San Diego Municipal Code, §26.0455](#), Disclosure of Commission Records.
- The agendas, minutes, and closed session results are posted on the Commission’s website.

Conflicts of Interest and Appearance of Impropriety

- Conflicts of Interest Codes as referenced on the [Office of the City Clerk website](#) and the Ethics Commission [Conflicts of Interest Frequently asked Questions section](#). The [San Diego Municipal Code §27.3501](#) references conflicts of interest and the appearance of conflicts of interest.

Withdrawal Procedures

- Not specified online.

Sanctions and Frivolous Complaints

- Per the [San Diego Municipal Code, §26.0440](#), the Commission may impose a fine on the Respondent of up to \$15,000 per violation.
- Fines associated with frivolous complaints were not specified within the Code.

Resources

- Staff: Per the [2025 Annual Report](#), the Commission staff consists of an Executive Director and five Program Managers. The Commission also has one independent General Counsel.
- Budget: [San Diego Municipal Code §26.0411](#) states the City Council will provide a reasonable budget for the Commission, but it is unclear the total budget provided for 2025.

Comparable Jurisdiction: Philadelphia, Pennsylvania

Government Structure

- Population: 1.57M ([United States Census Bureau 2024 – Philadelphia, Pennsylvania](#)).
- Form of Government: Mayor–Council system.
- Charter: [Philadelphia Home Rule Charter](#).

Oversight Body

- **Philadelphia Board of Ethics (BOE):** BOE advises on possible ethics violations, educates others on rules and regulations, conducts investigations, and enforces ethics rules. They focus on the following: Financial disclosures, Campaign finance rules, Lobbying, Gifts and gratuities, Conflicts of interest, Post-employment activities and representation, and Political activity restrictions for City employees and officials. The current board provides: ethics training for all City employees; enforces city campaign finance, financial disclosure, lobbying, and other public integrity laws; renders advice; investigates complaints; and issues fines.
- Relevant Links:
 - [Website](#)
 - [History](#)
 - [Ethics Resources](#)
 - [Philadelphia Board of Ethics Regulation No. 2: Investigations and Enforcement Proceedings](#)

Composition

- Five-member board
- [Board Members](#)

Employee Complaints

- BOE reviews complaints made regarding both officials and employees.

Complaint Volume

- Per the [2025 Annual Report](#), BOE reviewed 50 new enforcement matters.

Submission Requirements

- BOE complaint procedures per [Regulation No. 2](#).
- [BOE Concern Report Form](#): Requests name, email address, phone number and concern. Per Regulation 2, Section 2.5(a), the complaint shall provide the full name and address of the complainant and identify as the subject of the complaint. Their Executive Director will review the complaint for substantial compliance with the requirements of Section 2.5(a) and may dismiss the complaint if the Complainant does not comply.

Anonymous Submissions

- Anonymous submissions are not permitted. Per [Regulation No. 2](#), Section 2.5(a), the complaint shall provide the full name and address of the Complainant.

Confidentiality and Transparency

- [Regulation No. 2](#) Subpart D., Confidentiality of Complaints and Investigations, discusses the confidentiality of complaints and referrals (2.10[b]) and confidentiality of investigations (2.11[b]); distinctions are made between disclosures by persons other than Board or Board staff and disclosures by the Board or Board staff. In summary, while there are some exemptions to the disclosure requirements, the Board and Board staff shall not disclose or acknowledge at any time any information or documents related to the inquiry or investigation, including the identity of a Complainant or the complaint itself.
- [Regulation No. 2](#) Subpart E, Section 2.15(a), the Board's administrative enforcement proceedings shall be confidential unless the Respondent has provided written consent to a public proceeding. The request from the Respondent cannot be withdrawn. Section 2.15(d) and Section 2.21 states the Board and Board staff shall not disclose the identity of a complainant or the complaint itself unless required by a court order.

Conflicts of Interest and Appearance of Impropriety

- Conflicts of Interest guidance is contained in [Philadelphia Code, Chapter 20-600](#), Standards of Conduct and Ethics.
- Research was unable to identify a definition of "appearance of impropriety" under the laws; however, the Commission has published advisory opinions responding to this topic. For example, see [Board Opinion No. 2015-001](#).

Withdrawal Procedures

- Not specified online.

Sanctions and Frivolous Complaints

- Per [Regulation No. 2](#), Section 2.5(d), frivolous complaints are prohibited and the Executive Director may initiate an investigation if they receive information the complaint is false or frivolous.
- Per [Regulation No. 2](#), Section 2.28, any party is subject to a civil penalty of up to \$2,000 if they do not comply with Subpart D or Paragraphs 2.5(d), 2.7, 2.8 or 2.15 of Regulation No. 2.

Resources

- Staff: Per their [2025 Annual Report](#), BOE had 13 staff members including an Executive Director, Attorneys and Investigative Analysts.
- Budget: Per their [2025 Annual Report](#), BOE spent \$1.282M on salaries, purchase of services, and materials, supplies and equipment.

Comparable Jurisdiction: San Antonio, Texas

Government Structure

- Population: 1.53M ([United States Census Bureau 2024 – San Antonio, Texas](#)).
- Form of Government: Council–Manager system.
- Charter: [San Antonio, Texas – Code of Ordinances, Charter](#).

Oversight Body

- **Ethics Review Board (ERB)**: ERB has the jurisdiction to investigate and make findings concerning alleged violations of the ethics code, regulations governing lobbying, local campaign finance regulation, and section 141 (interest in city contracts prohibited) of the City Charter.
- Relevant Links:
 - [Website](#)
 - [San Antonio, Texas – Code of Ordinances, Chapter 2, Article III, Division 8](#)
 - [Section 141 of the City Charter](#)
 - Note: The [Code](#) references “rules and procedures governing its own internal organization and operations” but staff was unable to find this document through a public search.

Composition

- Eleven-member board.
- Board Members are listed in the [Annual Report](#), most recently published in 2023.

Employee Complaints

- ERB has jurisdiction over officials and employees under the Ethics Code.

Complaint Volume

- [Annual Report](#): Includes a summary of the Ethics Review Board activities including meeting dates for the whole body and panels, number and summary of complaints received, summary of advisory opinions issued, and summary of ethics/campaign finance training.
- 2024 and 2025: No Annual Report published on the website.
- 2023: Annual Report noted nine complaints were received, seven were returned, one was pending, and one was resolved.

Submission Requirements

- ERB complaint procedures listed under [Code of Ordinances, Chapter 2, Article III, Division 8](#).
- [Complaint Form](#): The complaint must include the name, address and contact information of Complainant, name and title of Respondent, details about the violation and statement of the facts, and all other relevant documents. The form must be notarized and must be filed in person or by mail.

Anonymous Submissions

- Not permitted.

Confidentiality and Transparency

- [Code of Ordinances, Chapter 2, Article III, Division 8](#), Section 2-83(h): The Board and staff must keep confidential any information about a pending sworn complaint.
- The [public meeting agendas](#) note the name of the Respondent and Complainant on items.
 - [Video of Ethics Review Board Meeting](#) – The Ethics Review Board heard statements from both the Complainant and Respondent, the outside counsel provided an overview of the complaint, the Chair opened the floor to discussion, the Board entered into executive session, and the Board made a final decision in open session.

Conflicts of Interest and Appearance of Impropriety

- San Antonio Code of Ethics: Conflicts of Interest and statements regarding “appearance and risk of impropriety” are contained in [San Antonio, Texas – Code of Ordinances, Chapter 2, Article III](#).

Withdrawal Procedures

- As stated in the [Video of Ethics Review Board Meeting](#) (Time Stamp 16:50), ERB staff state that once a complaint is submitted, it cannot be withdrawn by a Complainant. A written statement regarding withdrawals was not identified during the research.

Sanctions and Frivolous Complaints

- Per the [San Antonio, Texas – Code of Ordinances, Chapter 2, Article III](#), the Commission may impose the following sanctions for filing frivolous complaints: penalty of up to \$500, attorney’s fees incurred by the Respondent, other sanctions as permitted by law. The Code also references a range of sanctions for the Complainant if the Board determines a violation has occurred.

Resources

- Staff: Support from the City Clerk, assigned Compliance Auditor, a representative from City Attorney’s Office, and an independent attorney who serves as the independent compliance auditor and counsel.
- Budget: A budget was not specified online.

Other Ethics Boards and Commissions

- [Atlanta Board of Ethics](#)
- [Baltimore Ethics Board](#)
- [City of Chicago Ethics Commission](#)
- [City of Detroit Board of Ethics](#)
- [Honolulu Ethics Commission](#)
- [Los Angeles City Ethics Commission](#)
- [San Diego Ethics Commission](#)
- [San Francisco Ethics Commission](#)
- [Seattle Ethics and Elections Commission](#)
- [Washington DC Board of Ethics and Government Accountability](#)

DRAFT