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BEFORE THE SAN FRANCISCO  
ETHICS COMMISSION

In the Matter of ) SFEC Complaint No. 2021-008  
)  
Ahsha Safai for Supervisor 2020, Ahsha Safai, and )  
Joe Jaber, )  
) **Streamlined Administrative Resolution Program**  
Respondents. ) **STIPULATION, DECISION, AND ORDER**  
)  
)

THE PARTIES STIPULATE AS FOLLOWS:

1. This Streamlined Administrative Resolution Program Stipulation, Decision, and Order (Stipulation) is made and entered into by and between Ahsha Safai and Joe Jaber (Respondents) and the San Francisco Ethics Commission (the Commission).

2. Respondents and the Commission agree to settle and resolve all factual and legal issues in this matter and to reach a final disposition through the Commission’s Streamlined Administrative Resolution Program and without an administrative hearing. Upon approval of this Stipulation and full performance of the terms outlined in this Stipulation, the Commission will take no future action against Respondents, and this Streamlined Stipulation shall constitute the complete resolution of all claims by the Commission against Respondents related to the violations of law described in Exhibit A.

Respondents understand and knowingly and voluntarily waive all rights to judicial review of this Streamlined Stipulation and any action taken by the Commission or its staff on this matter.

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3. Respondents acknowledge responsibility for and agrees to pay an administrative penalty as set forth in Exhibit A. Respondents agree that the administrative penalty set forth in Exhibit A is a reasonable administrative penalty.

4. Within ten business days of the Commission’s approval of this Stipulation, Respondents shall either pay the penalty through the City’s online payment portal or otherwise deliver to the following address the sum as set forth in Exhibit A in the form of a check or money order made payable to the “City and County of San Francisco”:

San Francisco Ethics Commission  
Attn: Enforcement & Legal Affairs Division  
25 Van Ness Avenue, Suite 220  
San Francisco, CA 94102

5. If Respondents fail to comply with the terms of this Stipulation, then the Commission may reopen this matter and prosecute Respondents under Section C3.699-13 of the San Francisco Charter for any available relief.

6. Respondents understand, and hereby knowingly and voluntarily waives, any and all procedural rights under Section C3.699-13 of the San Francisco Charter and the Commission’s Enforcement Regulations with respect to this matter. These include, but are not limited to, the right to appear personally at any administrative hearing held in this matter, to be represented by an attorney at Respondents’ expense, to confront and cross-examine all witnesses testifying at the hearing and to subpoena witnesses to testify at the hearing.

7. Respondents understand and acknowledge that this Stipulation is not binding on any other government agency with the authority to enforce the San Francisco Campaign & Governmental Conduct Code section 1.100 *et seq.*, and does not preclude the Commission or its staff from cooperating with or assisting any other government agency in its prosecution of Respondent for any allegations set forth in Exhibit A, or any other matters related to those violations of law set forth in Exhibit A.

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8. This Stipulation is subject to the Commission’s approval. In the event the Commission declines to approve this Stipulation, the Stipulation shall become null and void, except Paragraph 9, which shall survive.

9. In the event the Commission rejects this Stipulation, and further administrative proceedings before the Commission are necessary, Respondents agree that the Stipulation and all references to it are inadmissible. Respondents moreover agree not to challenge, dispute, or object to the participation of any member of the Commission or its staff in any necessary administrative proceeding for reasons stemming from his or her prior consideration of this Stipulation.

10. This Stipulation, along with the attached Exhibit A, reflects the entire agreement between the parties hereto and supersedes any and all prior negotiations, understandings, and agreements with respect to the transactions contemplated herein. This Stipulation may not be amended orally. Any amendment or modification to this Stipulation must be in writing duly executed by all parties and approved by the Commission at a regular or special meeting.

11. This Stipulation shall be construed under, and interpreted in accordance with, the laws of the State of California. If any provision of the Stipulation is found to be unenforceable, the remaining provisions shall remain valid and enforceable.

12. The parties hereto may sign different copies of this Stipulation, which will be deemed to have the same effect as though all parties had signed the same document.

Dated: 05-21-2021 | 11:47:48 PDT

DocuSigned by:  
*LeeAnn Pelham*  
2ACC7A331EE7459

LEEANN PELHAM, EXECUTIVE DIRECTOR  
SAN FRANCISCO ETHICS COMMISSION

Dated: 05-20-2021 | 16:06:36 PDT

DocuSigned by:  
*Ahsha Safai*  
EB96C9808F4E4EA...

AHSHA SAFAI, INDIVIDUALLY AND ON BEHALF OF  
AHSHA SAFAI FOR SUPERVISOR 2020

Dated: 05-21-2021 | 11:28:29 PDT

DocuSigned by:  
*Joe Jaber*  
32CCF817C0FE4D0...

JOE JABER, TREASURER

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**DECISION AND ORDER**

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The foregoing Stipulation of the parties in the matter of “Ahsha Safai for Supervisor 2020, Ahsha Safai, Joe Jaber, SFEC Complaint No. 2021-008,” including the attached Exhibit A, is hereby accepted as the final Decision and Order of the San Francisco Ethics Commission, effective upon execution below by the Chairperson.

IT IS SO ORDERED.

Dated: 06-13-2021 | 23:14:58 PDT

DocuSigned by:  
*Noreen Ambrose*  
BE58A8860AF047B...

NOREEN AMBROSE, CHAIRPERSON  
SAN FRANCISCO ETHICS COMMISSION

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**Exhibit A**

**Description of Respondents:** Ahsha Safai for Supervisor 2020 is a candidate-controlled committee formed to support the candidacy of Ahsha Safai for District 11 Supervisor in the 2020 election cycle and Joe Jaber is the committee’s treasurer.

**Description of Violation:** In September 2020, Respondents distributed approximately 5900 campaign advertisements via short message service (SMS) that failed to include required disclaimer language in violation of Government Code section 84504.7(b)(2) and San Francisco Campaign & Governmental Conduct Code section 1.161.

**Specific Eligibility Requirements:** Respondents must sign and return this stipulated agreement within 90 days of contact by the Commission’s Enforcement Division.

**Specific Financial Penalty Modifiers:**

- \$500 if signed and returned by June 7, 2021
- \$511 if signed and returned by July 6, 2021
- \$1,016 if signed and returned by August 4, 2021