

From: Finance Wrap Up for San Francisco's 2011 Election, By Oliver Luby.

Section 4 – **Overall Contribution Limit Violations**

For San Francisco candidate campaigns, the law of the City & County has long provided two types of size-based limitations on contributionsⁱ. The first is the Individual Limit of \$500 per donor to a candidate. The second is the variable Overall Contribution Limit.

The Overall Limit is cumulative contribution limit, equal to \$500 *times* the number of elective offices up for grabs. In the November 2011 election cycle, the three offices for which candidates ran were Mayor, District Attorney, and Sheriff. Three offices results in a \$1,500 Overall Limit. Thus, campaign contributors were permitted to give \$500 each to their three favorite candidates or small amounts to more candidates (example: \$100 each to their 15 favorite candidates). The more offices in play during any election, the higher the Overall Limit.

The Overall Limit provides various campaign finance reform benefits. The law limits the ability of contributors to buy influence across the field, or at least the appearance of such ability. The law prevents hedge their bets on all or most of the candidates running. The law also reduces the overall amount of fundraising and thus spending by candidates.

In 2011, the San Francisco Ethics Commission proposed getting rid of the Overall Contribution Limit – the complex bill containing this amendment currently resides with the Board of Supervisors. An Ethics staff memo regarding the proposal claims that the Overall Limit is arbitrary (see: www.sfethics.org/files/cfro_meeting_packet_10.19.11.pdf). The memo further notes that the law is difficult for candidates to comply with, but then also states somewhat contradictorily that the existence of the law presented difficulties for candidates trying to raise funds in the last election. How much of impediment to fundraising can the law be it is not being complied with? Apparently, the Ethics Commission wishes to exonerate from the burdens of ephemeral regulation last year's crowded field, which included 11th hour candidates presumably unable to legally raise funds from donors who had already give the maximum of \$1,500.

Since Individual Contribution Limit would remain in play under the Ethics Commission's proposal, their amendment would effectively raise the Overall Limit to \$500 *times* the total number candidates running. Since 25 candidates were on the ballot last year, application of this amendment to the last election would have effectively resulted in that election's \$1,500 Overall Limit being raised to \$12,500, not counting further increases due to write-in candidates. The Ethics Commission memo referred to above put the total number of candidates at 48, an Overall Contribution Limit of \$24,000, well over 10 times the limit in effect last election. Anyone care for some more campaign mailers at your door?

Given this proposal for rolling back reform, I have taken the liberty of identifying the most obvious violations of the \$1,500 limit in the last election. The results are presented in the table below.

Table 1 - Overall Contribution Limit violations of the 2011 election

Note: The contributions listed in the table include not only contributions that appear to have exceeded the limit (marked in the table with Forfeiture amounts) but also many more perfectly legal contributions. The latter contributions are included as foundation for identifying those exceeding the limit. Limit violations were identified using a conservative, rote methodology. Results are not a final determination and could be subject to change depending upon factors such as return of the contributions received over the limit. Any omitted forfeitures were not intended.

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
Michael Antonini	Bevan Dufty for Mayor	01/26/2011	\$100	
	Tony Hall for Mayor 2011	01/28/2011	\$250	
	Dennis Herrera for Mayor 2011	01/31/2011	\$100	
	Join Joanna Rees for Mayor 2011	02/08/2011	\$125	
	Michela Alioto-Pier for Mayor 2011	05/27/2011	\$100	
	GASCON FOR DA 2011	06/23/2011	\$150	
	Phil Ting for Mayor 2011	06/26/2011	\$100	
	Miyamoto for Sheriff 2011	07/02/2011	\$125	
	Chris Cunnie for San Francisco Sheriff 2011	09/14/2011	\$200	
	Ed Lee for Mayor 2011	10/01/2011	\$200	
	Ed Lee for Mayor 2011	10/18/2011	\$100	\$50
	Michela Alioto-Pier for Mayor 2011	10/22/2011	\$100	\$100
	ED LEE FOR MAYOR 2011	11/03/2011	\$100	\$100
Philip Achilles	Dennis Herrera for Mayor 2011	12/15/2010	\$500	
	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/16/2010	\$500	
	Michela Alioto-Pier for Mayor 2011	03/17/2011	\$500	
	Ed Lee for Mayor 2011	09/09/2011	\$500	\$500
Roberta Achtenberg	Bevan Dufty for Mayor 2011	08/05/2010	\$200	
	Phil Ting for Mayor 2011	12/20/2010	\$250	
	Onek for District Attorney 2011	12/31/2010	\$200	
	Phil Ting for Mayor 2011	05/17/2011	\$500	
	Onek for District Attorney 2011	06/27/2011	\$300	
	Chris Cunnie for San Francisco Sheriff 2011	09/17/2011	\$500	\$450
	Bevan Dufty for Mayor	10/01/2011	\$300	\$300
	ED LEE FOR MAYOR 2011	12/07/2011	\$500	\$500
Jamileh Aish	Ross Mirkarimi for Sheriff 2011	09/05/2011	\$500	
	Ed Lee for Mayor 2011	09/11/2011	\$500	
	GASCON FOR DA 2011	09/20/2011	\$500	
	Dennis Herrera for Mayor 2011	11/06/2011	\$500	\$500
Wifse Aish	GASCON FOR DA 2011	06/02/2011	\$500	
	Ed Lee for Mayor 2011	09/11/2011	\$500	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	Ross Mirkarimi for Sheriff 2011	09/06/2011	\$500	
	Dennis Herrera for Mayor 2011	11/06/2011	\$500	\$500
	ED LEE FOR MAYOR 2011	12/12/2011	\$500	\$500
Dennis Antenore	Ross Mirkarimi for Sheriff, November 2011	05/09/2011	\$250	
	Avalos for Mayor 2011	06/09/2011	\$500	
	Ross Mirkarimi for Sheriff 2011	09/17/2011	\$250	
	Onek for District Attorney 2011	09/30/2011	\$250	
	LELAND YEE FOR MAYOR 2011	10/17/2011	\$500	\$250
Patrick Au	LELAND YEE FOR MAYOR 2011	06/30/2011	\$500	
	Dennis Herrera for Mayor 2011	08/26/2011	\$250	
	Chris Cunnie for San Francisco Sheriff 2011	09/13/2011	\$500	
	Sharmin Bock for District Attorney 2011	10/22/2011	\$500	\$250
	ED LEE FOR MAYOR 2011	10/25/2011	\$500	\$500
Bay Area Union Labor Party	GASCON FOR DA 2011	09/12/2011	\$500	
	Ross Mirkarimi for Sheriff 2011	09/19/2011	\$500	
	Dennis Herrera for Mayor 2011	09/23/2011	\$500	
	Ed Lee for Mayor 2011	10/12/2011	\$500	\$500
	LELAND YEE FOR MAYOR 2011	10/28/2011	\$500	\$500
Ben Bedi	Chris Cunnie for San Francisco Sheriff 2011	09/13/2011	\$500	
	Dennis Herrera for Mayor 2011	09/23/2011	\$500	
	David Chiu for Mayor 2011	09/23/2011	\$500	
	Ed Lee for Mayor 2011	09/30/2011	\$500	\$500
	Ross Mirkarimi for Sheriff 2011	10/23/2011	\$500	\$500
Luis Belmonte	Phil Ting for Mayor 2011	12/17/2010	\$500	
	GASCON FOR DA 2011	04/19/2011	\$250	
	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/03/2010	\$500	
	Michela Alioto-Pier for Mayor 2011	03/23/2011	\$500	\$250
	David Chiu for Mayor 2011	06/13/2011	\$500	\$500
Nancy Belmonte	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/03/2010	\$500	
	Michela Alioto-Pier for Mayor 2011	03/23/2011	\$500	
	GASCON FOR DA 2011	04/19/2011	\$500	
	David Chiu for Mayor 2011	06/13/2011	\$500	\$500
Maureen Blanc	Join Joanna Rees for Mayor 2011	09/21/2010	\$500	
	Sharmin Bock for District Attorney 2011	04/26/2011	\$500	
	Michela Alioto-Pier for Mayor 2011	05/19/2011	\$500	
	Ed Lee for Mayor 2011	09/01/2011	\$500	\$500
Mark Brennan	Bevan Dufty for Mayor	04/28/2011	\$400	
	Chris Cunnie for San Francisco Sheriff 2011	09/01/2011	\$500	
	Bill Fazio for District Attorney 2011	09/16/2011	\$500	
	Dennis Herrera for Mayor 2011	10/05/2011	\$500	\$400
Margaret Brodtkin	Bevan Dufty for Mayor	04/06/2011	\$250	
	Avalos for Mayor 2011	04/25/2011	\$250	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	Dennis Herrera for Mayor 2011	05/04/2011	\$250	
	Bevan Dufty for Mayor	06/24/2011	\$250	
	Onek for District Attorney 2011	09/21/2011	\$250	
	Dennis Herrera for Mayor 2011	09/24/2011	\$250	
	Avalos for Mayor 2011	10/03/2011	\$250	\$250
Jeremiah Casey	Tony Hall for Mayor 2011	02/24/2011	\$500	
	Bevan Dufty for Mayor	06/24/2011	\$200	
	Ed Lee for Mayor 2011	09/27/2011	\$500	
	GASCON FOR DA 2011	10/18/2011	\$500	\$200
Abra Castle	Avalos for Mayor 2011	04/29/2011	\$100	
	LELAND YEE FOR MAYOR 2011	06/17/2011	\$500	
	Ross Mirkarimi for Sheriff 2011	07/12/2011	\$500	
	ED LEE FOR MAYOR 2011	12/15/2011	\$500	\$100
Todd Chapman	Dennis Herrera for Mayor 2011	12/03/2010	\$350	
	Michela Alioto-Pier for Mayor 2011	06/30/2011	\$500	
	Sharmin Bock for District Attorney 2011	09/24/2011	\$500	
	ED LEE FOR MAYOR 2011	12/20/2011	\$500	\$350
Hagen Choi	LELAND YEE FOR MAYOR 2011	06/18/2011	\$500	
	David Chiu for Mayor 2011	06/28/2011	\$500	
	Onek for District Attorney 2011	07/12/2011	\$150	
	Ed Lee for Mayor 2011	08/30/2011	\$500	\$150
	GASCON FOR DA 2011	08/31/2011	\$300	\$300
	Ross Mirkarimi for Sheriff 2011	09/12/2011	\$300	\$300
	Adachi For Mayor 2011	10/21/2011	\$300	\$300
David Choo	Dennis Herrera for Mayor 2011	12/03/2010	\$200	
	Dennis Herrera for Mayor 2011	07/25/2011	\$200	
	Ed Lee for Mayor 2011	09/16/2011	\$500	
	GASCON FOR DA 2011	10/17/2011	\$500	
	Dennis Herrera for Mayor 2011	10/18/2011	\$100	
	David Chiu for Mayor 2011	10/20/2011	\$500	\$500
Michael Cohen	Michela Alioto-Pier for Mayor 2011	05/15/2011	\$325	
	LELAND YEE FOR MAYOR 2011	06/07/2011	\$500	
	Dennis Herrera for Mayor 2011	06/29/2011	\$500	
	Ed Lee for Mayor 2011	10/06/2011	\$350	\$175
Jerry Dal Bozzo	Dennis Herrera for Mayor 2011	05/13/2011	\$250	
	GASCON FOR DA 2011	06/28/2011	\$250	
	Ed Lee for Mayor 2011	08/20/2011	\$500	
	GASCON FOR DA 2011	09/22/2011	\$250	
	Tony Hall for Mayor 2011	09/30/2011	\$500	\$250
Todd David	Bevan Dufty for Mayor 2011	03/20/2010	\$100	
	Bevan Dufty for Mayor 2011	05/10/2010	\$100	
	Onek for District Attorney 2011	09/15/2010	\$250	
	Bevan Dufty for Mayor	02/18/2011	\$300	
	Dennis Herrera for Mayor 2011	05/25/2011	\$100	
	Dennis Herrera for Mayor 2011	06/14/2011	\$100	
	Onek for District Attorney 2011	06/28/2011	\$100	
	Join Joanna Rees for Mayor 2011	07/19/2011	\$250	
	Join Joanna Rees for Mayor 2011	07/25/2011	\$100	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	Onek for District Attorney 2011	08/24/2011	\$150	\$50
Henry Der	David Chiu for Mayor 2011	03/30/2011	\$150	
	Phil Ting for Mayor 2011	04/06/2011	\$500	
	David Chiu for Mayor 2011	07/18/2011	\$350	
	Adachi For Mayor 2011	09/16/2011	\$500	
	Chris Cunnie for San Francisco Sheriff 2011	09/23/2011	\$250	\$250
Francis Fernandez	Onek for District Attorney 2011	06/29/2011	\$500	
	Ross Mirkarimi for Sheriff, November 2011	06/30/2011	\$250	
	Avalos for Mayor 2011	06/30/2011	\$500	
	Adachi For Mayor 2011	09/23/2011	\$500	\$250
	Avalos for Mayor 2011	11/07/2011	\$500	\$500
Dennis Flynn	David Chiu for Mayor 2011	06/28/2011	\$500	
	Michela Alioto-Pier for Mayor 2011	06/30/2011	\$500	
	Ed Lee for Mayor 2011	10/18/2011	\$500	
	Ross Mirkarimi for Sheriff 2011	11/06/2011	\$200	\$200
Sabrina Foster	Avalos for Mayor 2011	04/29/2011	\$500	
	David Chiu for Mayor 2011	06/20/2011	\$500	
	Ross Mirkarimi for Sheriff, November 2011	06/30/2011	\$250	
	Ed Lee for Mayor 2011	10/22/2011	\$500	\$250
Curtis Gardner	Dennis Herrera for Mayor 2011	12/31/2010	\$500	
	Michela Alioto-Pier for Mayor 2011	05/04/2011	\$500	
	Sharmin Bock for District Attorney 2011	09/22/2011	\$500	
	GASCON FOR DA 2011	09/26/2011	\$500	\$500
Suzanne Giraud	Onek for District Attorney 2011	12/31/2010	\$250	
	Dennis Herrera for Mayor 2011	05/13/2011	\$500	
	GASCON FOR DA 2011	10/06/2011	\$500	
	Sharmin Bock for District Attorney 2011	10/18/2011	\$500	\$250
Cathy Greenwold	Dennis Herrera for Mayor 2011	06/15/2011	\$300	
	David Chiu for Mayor 2011	06/28/2011	\$300	
	GASCON FOR DA 2011	06/30/2011	\$500	
	Ed Lee for Mayor 2011	08/17/2011	\$500	\$100
David Gruber	Bevan Dufty for Mayor	06/22/2011	\$100	
	GASCON FOR DA 2011	06/24/2011	\$250	
	David Chiu for Mayor 2011	06/28/2011	\$250	
	Chris Cunnie for San Francisco Sheriff 2011	09/15/2011	\$250	
	Ed Lee for Mayor 2011	09/16/2011	\$500	
	Adachi For Mayor 2011	10/31/2011	\$500	\$350
Brendan Hallinan	Avalos for Mayor 2011	06/14/2011	\$500	
	Ross Mirkarimi for Sheriff, November 2011	06/24/2011	\$500	
	Sharmin Bock for District Attorney 2011	10/29/2011	\$500	
	David Chiu for Mayor 2011	10/31/2011	\$500	\$500
Daro Inouye	Miyamoto for Sheriff 2011	07/14/2011	\$260	
	Adachi For Mayor 2011	08/31/2011	\$500	
	Chris Cunnie for San Francisco Sheriff	09/01/2011	\$500	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	2011			
	Bill Fazio for District Attorney 2011	09/20/2011	\$500	\$260
Stephen Johnson	Bevan Dufty for Mayor	04/17/2011	\$100	
	Bevan Dufty for Mayor	07/11/2011	\$250	
	Chris Cunnie for San Francisco Sheriff 2011	08/26/2011	\$250	
	Ed Lee for Mayor 2011	09/23/2011	\$500	
	Bevan Dufty for Mayor	10/16/2011	\$250	
	Chris Cunnie for San Francisco Sheriff 2011	10/22/2011	\$250	\$100
Mary Jung	Phil Ting for Mayor 2011	12/27/2010	\$250	
	Bill Fazio for District Attorney 2011	08/14/2011	\$250	
	Miyamoto for Sheriff 2011	10/04/2011	\$150	
	PHIL TING FOR MAYOR 2011	10/04/2011	\$250	
	ED LEE FOR MAYOR 2011	11/02/2011	\$500	
	Sharmin Bock for District Attorney 2011	11/07/2011	\$250	\$150
Maurice Kanbar	Dennis Herrera for Mayor 2011	12/03/2010	\$500	
	Tony Hall for Mayor 2011	03/08/2011	\$500	
	Michela Alioto-Pier for Mayor 2011	06/17/2011	\$500	
	Ed Lee for Mayor 2011	08/31/2011	\$500	\$500
	GASCON FOR DA 2011	09/20/2011	\$500	\$500
	Sharmin Bock for District Attorney 2011	09/24/2011	\$500	\$500
Henry Karnilowicz	Bevan Dufty for Mayor 2011	09/24/2009	\$100	<i>At least \$250 in total forfeitures</i>
	Bevan Dufty for Mayor	04/02/2011	\$300	
	David Chiu for Mayor 2011	04/07/2011	\$200	
	Ross Mirkarimi for Sheriff, November 2011	05/25/2011	\$100	
	David Chiu for Mayor 2011	06/13/2011	\$50	
	Michela Alioto-Pier for Mayor 2011	06/17/2011	\$100	
	David Chiu for Mayor 2011	06/20/2011	\$100	
	Dennis Herrera for Mayor 2011	07/28/2011	\$50	
	Ed Lee for Mayor 2011	09/27/2011	\$500	
	Bevan Dufty for Mayor	10/12/2011	\$101	
	PHIL TING FOR MAYOR 2011	10/13/2011	\$100	
	Bevan Dufty for Mayor	10/19/2011	-\$101	
	GASCON FOR DA 2011	10/22/2011	\$200	
	ED LEE FOR MAYOR 2011	12/03/2011	\$500	
	GASCON FOR DA 2011	12/13/2011	-\$50	
	ED LEE FOR MAYOR 2011	12/31/2011	-\$500	
Rebecca Katz	Bevan Dufty for Mayor 2011	12/31/2009	\$100	
	Onek for District Attorney 2011	09/30/2010	\$100	
	Bevan Dufty for Mayor 2011	12/10/2010	\$100	
	Onek for District Attorney 2011	12/31/2010	\$100	
	Dennis Herrera for Mayor 2011	05/22/2011	\$200	
	Onek for District Attorney 2011	06/28/2011	\$100	
	Chris Cunnie for San Francisco Sheriff 2011	08/25/2011	\$200	
	Ed Lee for Mayor 2011	08/28/2011	\$200	
	Onek for District Attorney 2011	09/24/2011	\$100	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	Onek for District Attorney 2011	10/13/2011	\$100	
	David Chiu for Mayor 2011	10/22/2011	\$200	
	Chris Cunnie for San Francisco Sheriff 2011	11/06/2011	\$100	\$100
Barbara Kaufman	Join Joanna Rees for Mayor 2011	10/22/2010	\$500	
	Phil Ting for Mayor 2011	06/02/2011	\$500	
	GASCON FOR DA 2011	06/02/2011	\$500	
	ED LEE FOR MAYOR 2011	12/29/2011	\$500	\$500
Alvin Louie	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/18/2010	\$500	
	Miyamoto for Sheriff 2011	06/29/2011	\$300	
	Miyamoto for Sheriff 2011	07/08/2011	\$300	
	Ed Lee for Mayor 2011	09/20/2011	\$500	
	Miyamoto for Sheriff 2011	10/21/2011	\$200	\$300
Daniel Lurie	Dennis Herrera for Mayor 2011	03/11/2011	\$500	
	Onek for District Attorney 2011	03/31/2011	\$100	
	Bevan Dufty for Mayor	08/24/2011	\$200	
	Ed Lee for Mayor 2011	09/18/2011	\$500	
	GASCON FOR DA 2011	10/10/2011	\$500	\$300
Jonathan Manzo	David Chiu for Mayor 2011	06/28/2011	\$500	
	Chris Cunnie for San Francisco Sheriff 2011	09/13/2011	\$500	
	Bevan Dufty for Mayor	09/20/2011	\$250	
	PHIL TING FOR MAYOR 2011	11/07/2011	\$500	\$250
Eric Mao	LELAND YEE FOR MAYOR 2011	01/25/2011	\$500	<i>At least \$700 in total forfeitures</i>
	David Chiu for Mayor 2011	06/30/2011	\$500	
	Ed Lee for Mayor 2011	08/29/2011	\$500	
	Avalos for Mayor 2011	08/31/2011	\$500	
	David Chiu for Mayor 2011	09/15/2011	\$500	
	David Chiu for Mayor 2011	09/24/2011	-\$500	
	PHIL TING FOR MAYOR 2011	11/01/2011	\$200	
Kenneth McNeely	Bevan Dufty for Mayor	01/25/2011	\$200	
	Bevan Dufty for Mayor	03/29/2011	\$300	
	Dennis Herrera for Mayor 2011	04/04/2011	\$500	
	Chris Cunnie for San Francisco Sheriff 2011	09/12/2011	\$500	
	ED LEE FOR MAYOR 2011	12/15/2011	\$500	\$500
Carole McNeil	Dennis Herrera for Mayor 2011	04/08/2011	\$500	<i>At least \$500 in total forfeitures</i>
	GASCON FOR DA 2011	05/16/2011	\$500	
	David Chiu for Mayor 2011	08/25/2011	\$500	
	Ed Lee for Mayor 2011	08/31/2011	\$500	
	ED LEE FOR MAYOR 2011	11/22/2011	\$500	
	ED LEE FOR MAYOR 2011	12/31/2011	-\$500	
Fred Naranjo	Bevan Dufty for Mayor 2011	12/31/2009	\$100	
	Ross Mirkarimi for Sheriff, November 2011	05/13/2011	\$500	
	GASCON FOR DA 2011	08/04/2011	\$500	
	Avalos for Mayor 2011	09/09/2011	\$500	\$100
	PHIL TING FOR MAYOR 2011	11/09/2011	\$500	\$500

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	David Chiu for Mayor 2011	06/24/2011	\$500	\$500
	Ed Lee for Mayor 2011	09/11/2011	\$500	\$500
Robert Pedrero	Bevan Dufty for Mayor 2011	09/15/2010	\$200	
	Dennis Herrera for Mayor 2011	01/31/2011	\$500	
	Michela Alioto-Pier for Mayor 2011	05/23/2011	\$500	
	LELAND YEE FOR MAYOR 2011	05/24/2011	\$500	\$200
	David Chiu for Mayor 2011	06/22/2011	\$500	\$500
	Ed Lee for Mayor 2011	09/20/2011	\$500	\$500
	Avalos for Mayor 2011	09/24/2011	\$500	\$500
Wade Randlett	Dennis Herrera for Mayor 2011	09/23/2011	\$500	
	GASCON FOR DA 2011	10/17/2011	\$500	
	Ed Lee for Mayor 2011	10/18/2011	\$500	
	David Chiu for Mayor 2011	11/02/2011	\$500	\$500
Kevin Reed	Dennis Herrera for Mayor 2011	08/27/2010	\$500	<i>At least \$1,350 in total forfeitures</i>
	LELAND YEE FOR MAYOR 2011	03/01/2011	\$200	
	Phil Ting for Mayor 2011	03/01/2011	\$200	
	Avalos for Mayor 2011	04/20/2011	\$500	
	Ross Mirkarimi for Sheriff, November 2011	05/22/2011	\$500	
	Onek for District Attorney 2011	06/06/2011	\$250	
	Onek for District Attorney 2011	06/17/2011	\$250	
	GASCON FOR DA 2011	06/22/2011	\$300	
	GASCON FOR DA 2011	06/30/2011	\$200	
	LELAND YEE FOR MAYOR 2011	06/30/2011	\$250	
	GASCON FOR DA 2011	07/14/2011	-\$300	
	GASCON FOR DA 2011	07/14/2011	-\$200	
	Ed Lee for Mayor 2011	09/04/2011	\$200	
Stanley Roth	Onek for District Attorney 2011	10/11/2010	\$300	
	Bevan Dufty for Mayor 2011	10/28/2010	\$200	
	GASCON FOR DA 2011	04/27/2011	\$250	
	Ross Mirkarimi for Sheriff, November 2011	05/20/2011	\$250	
	Bevan Dufty for Mayor	06/28/2011	\$250	
	Dennis Herrera for Mayor 2011	09/24/2011	\$500	\$250
	David Chiu for Mayor 2011	09/24/2011	\$500	\$500
Antonio Ruiz	Avalos for Mayor 2011	09/09/2011	\$500	
	Ed Lee for Mayor 2011	09/22/2011	\$500	
	Bevan Dufty for Mayor	09/23/2011	\$250	
	Dennis Herrera for Mayor 2011	09/27/2011	\$500	\$250
Rodrigo Santos	Dennis Herrera for Mayor 2011	12/03/2010	\$200	
	Bevan Dufty for Mayor	03/01/2011	\$100	
	GASCON FOR DA 2011	06/09/2011	\$250	
	Chris Cunnie for San Francisco Sheriff 2011	08/09/2011	\$250	
	GASCON FOR DA 2011	08/18/2011	\$250	
	Ed Lee for Mayor 2011	09/27/2011	\$250	
	David Chiu for Mayor 2011	12/07/2011	\$400	\$200
Sam Singer	Bevan Dufty for Mayor 2011	01/04/2010	\$100	
	Bevan Dufty for Mayor 2011	12/30/2010	\$200	

Contributor	Recipient Candidate	Contribution Date	Contribution Amount ⁱⁱ	Forfeiture Amount
	Bevan Dufty for Mayor	01/04/2011	-\$100	
	Dennis Herrera for Mayor 2011	02/08/2011	\$500	
	Michela Alioto-Pier for Mayor 2011	03/02/2011	\$500	
	LELAND YEE FOR MAYOR 2011	09/14/2011	\$500	\$200
	Ross Mirkarimi for Sheriff 2011	09/17/2011	\$500	\$500
	David Chiu for Mayor 2011	10/11/2011	\$500	\$500
	Chris Cunnie for San Francisco Sheriff 2011	10/17/2011	\$500	\$500
Tony Thompson	Bevan Dufty for Mayor 2011	12/31/2009	\$100	
	Bevan Dufty for Mayor 2011	05/26/2010	\$100	
	Phil Ting for Mayor 2011	06/29/2011	\$125	
	Ed Lee for Mayor 2011	09/01/2011	\$500	
	Bevan Dufty for Mayor	09/23/2011	\$250	
	Avalos for Mayor 2011	11/04/2011	\$500	\$75
Robert P. Varni	GASCON FOR DA 2011	03/17/2011	\$100	
	Dennis Herrera for Mayor 2011	05/13/2011	\$250	
	Dennis Herrera for Mayor 2011	07/26/2011	\$250	
	Michela Alioto-Pier for Mayor 2011	07/27/2011	\$500	
	Chris Cunnie for San Francisco Sheriff 2011	08/09/2011	\$500	\$100
	GASCON FOR DA 2011	10/06/2011	\$100	\$100
Regina Yin	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/13/2010	\$500	
	Phil Ting for Mayor 2011	12/28/2010	\$500	
	David Chiu for Mayor 2011	05/18/2011	\$450	
	Ed Lee for Mayor 2011	08/31/2011	\$500	\$450
Johnson You	LELAND YEE FOR MAYOR 2011 EXPLORATORY COMMITTEE	12/17/2010	\$500	
	Avalos for Mayor 2011	05/23/2011	\$200	
	Ed Lee for Mayor 2011	09/18/2011	\$500	
	PHIL TING FOR MAYOR 2011	12/01/2011	\$500	\$200
Total Forfeitures				\$29,110

Based on the above information, the law appears to authorize forfeitures from the following candidates and their campaigns, as follows:

Table 2 – Total Forfeitures by Campaign Committeeⁱⁱⁱ

Ed Lee for Mayor 2011	\$7,725
David Chiu for Mayor 2011	\$4,700
Dennis Herrera for Mayor 2011	\$1,900
Gascon for DA 2011	\$1,900
Chris Cunnie for San Francisco Sheriff 2011	\$1,500
Ross Mirkarimi for Sheriff 2011	\$1,500
Avalos for Mayor 2011	\$1,425
Leland Yee for Mayor 2011	\$1,150
Sharmin Bock for District Attorney 2011	\$1,150

Phil Ting for Mayor 2011	\$950
Adachi For Mayor 2011	\$900
Michela Alioto-Pier for Mayor 2011	\$350
Bevan Dufty for Mayor	\$300
Miyamoto for Sheriff 2011	\$300
Bill Fazio for District Attorney 2011	\$260
Tony Hall for Mayor 2011	\$250
Onek for District Attorney 2011	\$50

The donors who contributed over the limit are also potentially liable for penalty assessments for limit violations.

Supervisor Scott Wiener has adopted the Ethics legislation proposing deletion of the cumulative limit. The Board of Supervisors has not yet considered it for approval.

Some remedies for Overall Contribution Limit violations:

1. Don't delete the law. Enforce it.
2. Ensure that candidate campaigns use donor cards that alert contributors regarding the applicable Overall Limit for the election. Require the donors to affirmatively sign that their contribution does not exceed the Limit.
3. Require the San Francisco Ethics Commission to conduct educational outreach to campaign contributors, as is done by the Los Angeles City Ethics Commission for LA's identical Overall Contribution limit law.

ⁱ These limits do not apply to a candidate's contributions to his or her own campaign.

ⁱⁱ It is unclear how instances of returned contributions (expressed as negative contribution in the table) affect the amount of the forfeiture. For the sake of simplicity, I treated the returned contributions as a reduction in the amount of the forfeiture incurred.

ⁱⁱⁱ Table 2 does not include any of the italicized forfeitures identified in Table 1, since it is not always clear which campaign is liable for those instances of forfeitures.