

Violations

Concept: Retain progressive enforcement resulting in “three strikes you are out” within a rolling 12-month period. Add a two year cooling off period for bad actors. Proactively review websites by intermediaries (i.e. Airbnb, Flipkey, etc.) to improve compliance with city requirements.

Rationale: Complaint driven process allows bad actors to fly under the radar. Progressive enforcement with risk that license will be revoked for a period of 2 years may improve compliance.

Other options:

- Maintain complaint driven approach to compliance with city rules.
- Use progressive enforcement (i.e. warning, suspension, revocation) without cooling off period. Risk associated with license cap is enough.
- Fixed monetary fine for each violation with or without risk of revocation.