

The Public Trust

Volume 11, Issue 1

Thinking About A New Job? Questions You Need to Ask

Employees considering leaving City service need to be aware of ethics laws that could affect how they search for their new job, and, in some cases, that could restrict what they may or may not do in their new position.

These “revolving door” provisions are part of the City’s Governmental Ethics Ordinance, LAMC § 49.5.1 *et seq.* State law may also apply in certain situations. Together, these laws are intended to keep former public officials and employees from unwittingly – or intentionally – trading on their former positions to unfairly benefit or otherwise give an undue competitive edge to, a private entity.

At the same time, these laws reflect the legitimate interests of those who wish to have diverse experiences both in and out of government during their careers by applying only in very specific situations.

Below are five questions you should remember to ask yourself if you’re contemplating a move to a new job outside of City government. Because the application of these laws is very fact-specific, if you have questions about how these laws might apply to you, feel free to contact the City Ethics Commission’s Program Operations for additional guidance.

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Next Meeting

May 13, 2008
9:30am
City Hall, Rm. 1050

Agendas can be easily accessed at least 72 hours before a Commission meeting at the following website:

<http://ethics.lacity.org/meetings.cfm>

Agendas are also posted on in the 2nd floor lobby of City Hall East and at the Commission’s office no later than 72 hours before a Commission meeting. If a “special” meeting is called by the Commission, the meeting agenda is noticed at least 24 hours in advance.

Outside Employment: Five Quick Tips

Even in the best of economic times, City employees can have numerous reasons for seeking outside employment. Some may be exploring a career change. Others, who have an entrepreneurial spirit, may be driven to open a business and be their own boss – at least part of the time. Still others may be working to achieve certain

personal or family financial goals.

No matter the financial climate, and whatever the reason, City workers need to be aware of rules that govern their outside employment.

To help safeguard the public’s interests by promoting accountability and avoiding possible conflicts, the City’s ethics laws require outside employment

to be approved in advance by the employee’s General Manager or appointing authority. In some cases involving outside employment with a “restricted source,” the Ethics Commission’s review and approval is also required. In other limited situations, outside employment may be denied if certain factors established in the law are present.

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Message from the Executive Director

As this issue of *The Public Trust* was being finalized, departmental hearings on the FY08-09 budget before the Council’s Budget and Finance Committee were just beginning. While the Ethics Commission will not be immune from cost-cutting measures to address the City’s budget deficit—estimated to exceed \$400 million—we do recognize that responsible stewardship of the public’s resources means that each department, no matter its size, has a job to do. Already in this fiscal year, for example, our staff resources have been reduced.

During these difficult budget times, however, we are working hard to make sure that our severely limited resources effectively target our core mandates.

As we work to mitigate the impact of further budget cuts

on our staffing and operations, we will be sharply focusing our efforts on the fundamental Charter-mandated work that the voters established for the Ethics Commission:

- sound advice and guidance that are vital to strong compliance;
- clear, practical, and enforceable laws that are developed empirically and collaboratively; and
- accountability that supports the public trust.

As we plan and prioritize our work over the coming months and into the fiscal year that will begin July 1, our efforts will be shaped not only by budget constraints but by several other key dynamics.

First, the upcoming 2009 election will see eight Council races and three Citywide offices decided by the voters.

Based on its core mandates, our agency will continue to train, advise, audit, and enforce in connection with these campaigns. In addition, this is the first election in which Los Angeles Unified School District board candidates are also subject to the City’s campaign laws. Timely, thorough, and practical advice about the laws and policies that apply to these campaigns and their supporters will be vital to sustaining the kinds of strong compliance rates we’ve seen in our most recent City elections. [See, for example, our article on audits from the 2007 election cycle in this newsletter.]

Second, we must regularly review the laws under our jurisdiction to ensure they are strong, workable, and effective. We know that laws that are well-intended but not workable in practice, that have truly outlived a once-perceived need, or that are not funded sufficiently to be administered effectively, can be counterproductive and damaging to the public trust.

As policy issues surrounding campaigns and governance become more complex, laws proposed in response to those dynamics can also be complex. To ensure that the laws are clear, practical, and enforceable, we believe it is important to develop policy collaboratively and in light of real-world considerations. [For a recent example of this, see our article on Form 52 as an alternative financial disclosure form for neighborhood council boards, also in this newsletter.]

Last, a ‘revolution of rising expectations’ for accessible information that supports meaningful stakeholder engagement is only continuing to escalate. The voters’ mandate for ethics training for City officials and employees, and a maturing neighborhood council movement, are two developments that are

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Neighborhood Council Files & Financial Disclosure

In January and February 2008, the Los Angeles City Council introduced two motions that would require the members of neighborhood council boards to file a public personal financial disclosure form if their councils choose to put an item before the City Council by creating Neighborhood Council Files, or NCFs. For elected officials, and many appointed officials and employees, personal financial disclosures are made using a California Statement of Economic Interests, or Form 700. In March, the City Ethics Commission responded to requests from three City Councilmembers to review a possible Form 700 filing requirement for neighborhood council governing boards that create NCFs.

Striking a Balance

Throughout California, elected officials, many government employees and certain public service appointees are required by State law to file periodic financial disclosure statements because they make or participate in making governmental decisions. This public disclosure requirement serves two main purposes. First, it helps alert officials and employees to any financial interests they may have that could be affected by their governmental actions. In this way, it acts as a tool that enables public officials to seek advice before acting so that they can avoid conflicts of interests. Second, because the filings are public documents, financial disclosure statements help promote accountability in government decision

making. Ultimately, therefore, public financial disclosure can help maximize confidence that decisions are made only on the merits, without regard to anyone's private financial gain.

In reviewing whether to recommend the Form 700 filing for neighborhood councils who create NCFs, the Ethics Commission concluded that the level of disclosure required by Form 700 would be disproportionate to the role and responsibilities of neighborhood council board members at this time. Currently, neighborhood councils are advisory bodies, with no ultimate decision-making authority.

Consequently, in the Ethics Commission's view, requiring broad financial disclosure for neighborhood council boards at this point could have the unintended consequence of reducing public participation, rather than encouraging it. Instead, the Commission recommended an alternative form it created, CEC Form 52.

CEC Form 52 asks for some of the same financial interests as Form 700, including employers, real estate interests, and business interests. The form asks that those financial interests be disclosed, however, only if they relate to an NCF and only by neighborhood council board members who participate in the vote regarding the creation of the NCF. The first page of Form 52 asks for items that the Ethics Commission

Did you know?

Ethics Liaisons

Did you know that every City department and Commission has its very own Ethics Liaison?

Ethics Liaisons are City employees appointed by their department head to work in conjunction with the City Ethics Commission to promote public trust through transparency, impartiality, and accountability. Together the CEC and Ethics Liaisons provide City officials with the latest ethics information and ensure compliance of our City's governmental ethics laws.

For additional information on departmental Ethics Liaisons, please contact our office at (213) 978-1960.

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Advice & Education: Closing the Information Gap

As those involved in making City decisions continue to explore new and innovative ways to solve complex public policy problems -- particularly in a climate of increasing financial constraints -- equipping those individuals with tools and information to assure that City decision making is fair, transparent and accountable becomes increasingly important.

Easy access to clear and reliable information that supports this aim is more important than ever before.

With a mandate to support and equip effective decision making and an informed citizenry, the Ethics Commission continues to be committed to providing helpful guidance and useful tools for City officials, employees, and those regulated by the City's

ethics, campaign finance, and lobbying laws to heighten their awareness and knowledge of those laws.



To keep informed of any new publications released by the CEC, or to receive a copy of our latest publications, newsletters, and bulletins, sign up at http://ethics.lacity.org/newsletter/simplestend_signup.cfm.

Timely access to helpful information about City ethics laws is not only a click away, but

also just a phone call away. Our Program Operations staff can provide you with informal advice and answers to many questions you may have. They can be reached at (213) 978-1960 and they'll be happy to assist you.

Recent Enforcement Actions

Between December 2007 and April 2008, the City Ethics Commission acted on 17 stipulated settlements that stemmed from prior City elections and resulted from the Commission's mandate to audit City campaigns following each election cycle.

Nearly all the settlements involved contributors or candidate-controlled committees that made or received, or gave, campaign contributions in excess of allowable amounts.

Other violations resolved through the settlements included: failure to keep proper campaign records, failure to provide a proper disclaimer, and a failure to provide public copies of campaign literature.

All but two of the settlements qualified for consideration under the Commission's Infraction Policy

Under the City Charter, candidates for Citywide office may receive up to \$1,000 from a contributor in a primary or general election. City Council candidates may receive no more than \$500 from any person in a single election.

All but two of the settlements involving excess contributions qualified for consideration under the Commission's Infraction Policy. The Infraction Policy allows the Commission to waive any fine if the amount contributed or received falls under a certain amount, among other factors.

For more general information about the Commission's audit mandate, and copies of audit reports conducted following the 2007 municipal election, please visit our audit page at <http://ethics.lacity.org/audits/index.cfm>.

Thinking About a New Job? Questions You Need to Ask *(Cont. from Page 1)*

1. Is my potential new job with a private entity or a governmental agency?

While the restrictions discussed here do not apply if you are seeking employment with another government agency, the status of some entities (such as some private-public partnerships) may not be as clear as you might think. When in doubt, call us for further assistance.

2. Can I explore potential employment with people I'm interacting with in my current City job?

LAMC § 49.5.12 places certain restrictions on when City officials and employees may negotiate future employment with those who have matters pending before them.

A member of the City Council, as well as a member of any board, commission, committee, or other voting body who is required to file a Statement of Economic Interest, is prohibited from negotiating future employment with any person or entity (except a governmental agency) that has a matter pending before the official or the official's agency that falls within the regulatory, proprietary, or contractual jurisdiction of that agency.

Other officials and employees required to file Statements of Economic Interests may not negotiate future employment with any person or entity (except a governmental agency) that has a matter pending within the regulatory, proprietary, or contractual jurisdiction of his or her agency that is currently pending before that officer or employee. To better understand this restriction, please see the following illustration.

EXAMPLE

For the past six months, Council staffer Sylvia has been assigned as the point person for a mixed-use, moderate-income development in her boss's district. As part of her work on the issue, she's run interference with housing and

community groups, the developer, and that developer's lobbyist to help make sure that the plan to be considered by her boss's committee will meet the community's desire for green space, ample parking, and appropriate traffic mitigation. Her work has been well received by all sides, and the lobbying firm she's been working with on the issue would like to hire her to handle its projects citywide. Following a meeting one day, Sylvia and the lobbyist, Link, continue their discussion over coffee. As they do, Link offers Sylvia employment with his firm as its new community relations director. What should Sylvia do?

Because City law bans a City official from directly or indirectly negotiating the possibility of future employment with someone who has a matter currently pending before that officer or employee, Sylvia should not engage in discussions about future employment with Link at this time. If Sylvia wants to pursue employment negotiations with Link, she should avoid having those discussions until the matter she's been working on has concluded. Alternatively, she should recuse herself from any involvement with that matter and ask that it be permanently reassigned to another person in her office, thereby freeing her to engage in employment negotiations with Link.

(In addition, remember that City employees and officials may *not* act on any matter involving someone with whom they have an agreement for future employment. Both City and state law require recusal on matters concerning or affecting a prospective employer. (LAMC § 49.5.12 D, and Cal Govt Code § 87407 and related regulations.))

3. Will the duties of my new job include lobbying City agencies?

If so, keep in mind that former City officials and employees have restrictions on when they may perform compensated lobbying activities in an attempt to influence the actions of City agencies and what matters they may seek to influence. These restrictions vary based on the position the former City official or employee held, on the nature of the matter,

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Thinking About a New Job? Questions You Need to Ask *(Cont. from Page 6)*

on his or her level of involvement with that matter while in City service.

For two years after leaving City service, elected officials, under LAMC §49.5.11(D), are forbidden from receiving compensation to directly attempt to influence *any* City agency on *any* matter. That is, communicating with a City agency on behalf of another person, for pay, with the purpose of influencing any action or decision pending before that agency, is banned.

Other high-level officials are forbidden from such activities for one year. City law defines these high-level officials broadly -- in addition to elected officials, the definition includes elected officials' designated staff members, the Chief Legislative Analyst and the City Administrative Officer, members of the Board of Public Works, the Ethics Commission and its Director, and the Planning Commission and its Director. For a complete list of "high-level officials," see the Governmental Ethics Ordinance, LAMC § 49.5.2, at http://ethics.lacity.org/PDF/laws/law_geo.pdf.

Other City officials who are required to file a Statements of Economic Interests, but who are not high-level officials, are forbidden from receiving compensation for attempting to influence their former agencies for a period of one year. (LAMC §49.5.11 (E))

4. After the initial "cooling-off" period following my City service, how would my active ties be restricted?

After leaving City service, City officials and employees are forbidden

from engaging in compensated attempts to influence any City action and assisting or advising any other person other than an agency regarding matters in which they were "personally and substantially" involved for the life of that matter. (LAMC § 49.5.11(A))

"Personal and substantial" participation includes: making or voting on a decision, making a recommendation on such a vote or decision, rendering advice, performing investigations, or conducting research.

This prohibition only applies if the specific matter is still pending before that City agency, or if the agency is a party to or has a direct or substantial interest in the specific matter.

Also, depending on the circumstances, Government Code section 1090 may bar former employees and officials or their new employers from receiving a City contract or benefiting from a City contract if the official or employee was involved in creating the contract or the opportunity for the contract while with the City.

5. These issues sound complicated. Where can I go for further guidance?

A good place to start if you have questions may be the advice we have issued in the past on these issues. Over the years, we've issued a variety of written formal advice to provide more clarity about how the law applies in various specific circumstances.

Also, our Program Operations division is available at (213) 978-1960.

Requesting Advice

The CEC issues two types of advice on laws regarding governmental ethics, campaign finance, and lobbying:

Informal

- In person: 200 N. Spring St., 24th Floor, Los Angeles, CA 90012; or
- By telephone: (213) 978-1960.

Formal

- In writing: 200 N. Spring St., 24th Floor, Los Angeles, CA 90012; and
- Binding if requested *before* taking any action.

To view advice letters that have been issued to others from 1999 to the present, please go to:

http://ethics.lacity.org/Advice/advice_index.cfm

Outside Employment: Five Quick Tips *(Continued from page 1)*

Below are a few quick tips on some of the responsibilities that City law places on City employees regarding outside employment. If you have any questions about these requirements, or how they might apply to you, please feel free to contact the City Ethics Commission's Program Operations staff at (213) 978-1960.

1. Only Do City Work on City Time

While you are being paid to conduct City business, that is exactly and only what you should be doing. Engaging in outside employment while on the City's clock or while using City resources is a violation of LAMC § 49.5.5 (C), and you can be fined up to \$5,000 *per occurrence* or criminally prosecuted under City or state law. Just don't do it.



2. Know Your Status

By law, elected City officials may not receive any outside income, including honoraria, during their time in office. Other City officials -- defined as individuals who are required to file a Statement of Economic Interests ("SEIs") -- are less restricted. City employees who are not required to file financial disclosure statements have even fewer restrictions. These distinctions, as well as the different obligations placed on these different types of City employees, are cited below.

3. Get Approval from Your General Manager or Appointing Authority

All full-time City officials must get written approval from their general manager

(or appointing authority for general managers and Public Works Commissioners) prior to receiving any outside income. Even if you are not required to file an SEI, ask your manager about any approvals that may be required by your department or division.

State law also severely limits acceptance of any honoraria by City officials, that is, SEI filers (Govt Code § 89502). A City official is prohibited from receiving honoraria payments from any source of gifts or income that official is required to report on

his or her Statement of Economic Interests. Some limited exceptions apply, such as income earned from a bona fide business or profession of the official. When in doubt, ask!

4. Make Sure Your Second Job Doesn't Conflict with Your City Employment

General managers may deny outside employment requests if that work -- or income from that work -- presents a conflict with your City job. For example, if your City job involves approving widget purchase orders, moonlighting at the company that sells those widgets to the City is probably not a good idea.

Some of the factors your general manager may use to determine this include:

- whether the income you receive creates the appearance of, or involves the actual use of, your office, time, facilities, or equipment;

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Neighborhood Council Files *(Continued from page 3)*

identified as core financial matters: employers, real estate interests, and business interests. The second page relates to the particular NCF that triggered the reporting. Filers are asked to either make an affirmative statement that they have no other financial interests or benefits that relate to the NCF or to list the other financial interests or benefits that do relate to the NCF.

In the Commission's view, Form 52 would strike a balance between the advisory role of neighborhood councils and the transparency benefits of public financial disclosure. Neighborhood council board members already are subject to the conflict-of-interest provisions in the state's Political Reform Act of 1974. Some financial disclosure is important because, the Commission concluded, it would serve as a tangible reminder of those requirements. By helping to ensure that potential conflicts of interests for neighborhood council board members are detected and avoided, it also would promote public confidence in the neighborhood

The City Council's Education and Neighborhoods Committee considered financial disclosure by neighborhood council board members in February and April and will take the matter up again in early May.

After the committee makes its recommendations, the full City Council will weigh in



and make a final determination about whether to require financial disclosure of neighborhood council board members and, if so, what level of disclosure to require. The issue stems from City Council action on January 15, establishing a two-year pilot project that authorizes neighborhood councils to create up to three NCFs per calendar year. Creating an NCF requires two neighborhood councils: one to introduce exemption.

the file, and another to second it. An amending motion attempted to require members of both neighborhood councils to file Form 700. However, the Los Angeles Administrative Code currently exempts neighborhood councils from filing Form 700, so a second motion was introduced in February to request an ordinance that eliminates the NCFs do not obligate the City Council to any action, but instead serve as formal suggestions to the Council

to take action on a particular matter. NCFs are matters of public record, and will provide a record of what issues draw the attention of

neighborhood councils and what action, if any, the Council chooses to take on those matters.

For legislative updates, including status reports on the neighborhood council financial disclosure issue, feel free to bookmark our Web site at <http://ethics.lacity.org> and visit our policy page for continuing developments.

On the Fast Track: 2007 Audit Cycle Completed

As part of its voter-approved mandate, the City Ethics Commission regularly audits the political committees of City candidates. The City’s charter and administrative code determine which committees and candidates are subject to an audit.

In January 2008, the City Ethics Commission completed its Fast Track Audit (“FTA”) program in connection the 2007 regular and special elections. For that audit cycle, Commission auditors were required to audit 27 committees that together received \$4.3 million in con-



tributions and spent \$4.5 million. Instituted during the 2005 audit cycle, the FTA program enables audits to be completed within 29 business days for Citywide committees, and 20 business days for City Council committees.

For the 2007 audit cycle, 63 percent of the committees audited – or 17 of 27 – had clean audits with no audit findings.

For the ten committees that had audit findings -- instances where the committee failed to demonstrate that it complied with the law -- typical findings included: receiving money from an impermissible source (such as a lobbyist),

receiving a larger contribution from a single source than allowed, or failing to provide the Ethics Commission with copies of campaign advertisements for the public file as required by City law. Audits with findings are forwarded for further review as a matter of course to the Ethics Commission’s Enforcement Division, the City Attorney’s Office (pursuant to City Charter Section 470 (n)(1)), and the state Fair Political Practices Commission.

The Commission’s written audit reports serve three purposes:

First, audits determine the candidate’s, treasurer’s and committee’s degree of compliance during a campaign with state and City campaign finance laws and regulations. In this capacity, the audits have historically played an ongoing role in the Commission’s enforcement. All audit reports are forwarded as a matter of course to the CEC’s Enforcement Division, the City Attorney’s Office (pursuant to City Charter Section 470 (n)(1)) and the Fair Political Practices Commission after the audit is completed.

Secondly, audits help ensure that a candidate’s fundraising and expenditure information are accurately disclosed to the public. Significant reporting errors by a committee are

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Whistleblower Hotline

The City’s Whistleblower Hotline allows you to *anonymously* report suspected violations of laws related to governmental ethics, campaign finance, and lobbying.

You may report a suspected violation by using any of the following methods:

•**In person or by mail:**
200 N. Spring St.,
24th Floor, Los Angeles, CA 90012; or

•**By telephone:**
(213) 978-1999 or
1(800) 824-4825; or

•**Online:**
<http://ethics.lacity.org/Whistleblower/complaint.cfm>

•**Fax:**
(213) 978-1989.

If you are a City employee, City law prohibits any retaliatory acts being taken against you for use of the whistleblower hotline. If you feel you are being retaliated against, you should contact the City Ethics Commission immediately at (213) 978-1960.

Executive Director Msg *(Continued from page 2)*

expanding the base of ethics stakeholders in the city. At the same time, the demand for timely and relevant information about City ethics laws and how they apply is also increasing.

Addressing these needs effectively with clear and specific advice and materials will help equip those involved to be informed participants and sound decision makers.

Two additional articles in this newsletter—one on outside employment and another on ethics issues for those considering leaving City service—are intended to be helpful tools to support that goal.

After you've read this newsletter, feel free to let me know what you think. I can be reached at leeann.pelham@lacity.org. And thanks in advance for your time and interest.

LeeAnn

Outside Employment *(Continued from page 7)*

- whether you are in a position to make, participate in making, or influence a governmental decision that could potentially have a material impact on the source of income; and

- whether the services involve time demands that could make the performance of your City duties less efficient.

5. Know Which Entities are Considered "Restricted Sources" to You

You are required to also receive written approval from the Ethics Commission, prior to accepting outside employment, if your proposed employment is with a "restricted source."

The definition of a "restricted source," which can be found at LAMC § 49.5.2, varies depending on whether you are considered a "high-level official" or not. (If you are not required to file a Statement of Economic Interests, this section does not apply to you.)

Restricted sources to high-level officials include: all registered lobbyists and lobbying firms, any person or entity doing or seeking to do business with the City, and any person or entity that has had business pending before that official or the City Council within the past nine months.

For other City officials, restricted sources include: lobbyists and lobbying firms who are seeking to influence the decisions of the official's agency, a person or entity doing or seeking to do business with the official's agency, and any person or entity that has had business pending before that official within the past nine months.

On the Fast Track: 2007 Audit Cycle Completed *(Cont. from Page 9)*

included as findings on the written audit report, and the audit reports themselves are designed provide an understandable public record of the committee's compliance with applicable laws.

Finally, the audits serve as a means of educating candidates and treasurers by informing them about areas where the campaign recordkeeping practices could be improved.

Los Angeles Administrative Code § 24.6, requires Ethics Commission staffers to audit the records of each candidate who raises or spends \$100,000 or more in connection with a primary, general or special City election. The code also requires the Commission to audit any candidate that receives public matching funds.

Auditors determine the order in which candidates and committees will be audited, based on the following factors:

the office sought;
the amount of money raised and spent by the candidates;
whether the candidate received matching funds;
problems identified during the campaign, if any; and
how highly the race was contested.

The Commission's Fast Track Audit program was designed with input from campaign treasurers and was designed to improve the timeliness of completing mandatory audits through improved cooperation in the audit process without sacrificing audit quality or sound public policy.

For copies of the Commission's 2007 audit reports, please go to the audit section of our Web site, <http://ethics.lacity.org/audits>.

Contribution Limits Reviewed

Following a thorough review of the City's campaign contribution limits, the City Ethics Commission in March declined to recommend any increase in the amount City candidates may raise from contributors at this time. The Commission noted the fact that actual contributions in City elections continue to fall far below existing limits, and that increasing current limits may unfairly benefit incumbent officeholders. The Commission also declined to adjust the spending limits that apply to candidates who participate in the City's public matching funds program, and to the limits that City law currently imposes on elected officials' Officeholder Fund Accounts.

The Commission's recommendations were transmitted to the City Council, where action is pending.

The Commission's review was triggered by a City law requirement first enacted in August 2003, Los Angeles Municipal Code § 49.7.12, which requires the Commission to determine whether certain limits in City law should be adjusted to reflect changes in the Consumer Price Index. The provision requires the Commission to review, every five years, the contribution limits established by voters in City Charter § 470(c), the campaign spending limits of LAMC § 49.7.13, and the officeholder account expenditure limits in LAMC § 49.7.12(A)(6).

Currently, no person may contribute more than \$500 in a primary or general election to a candidate for City Council. Contribution limits for the three Citywide candidates

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Policy and Legislation

Mission Statement

As an independent voice for more open and responsive City government, the Los Angeles City Ethics Commission acts through its voter-established mandate to preserve the public trust. Through meaningful public disclosure and effective education, the Commission is committed to supporting and equipping an informed citizenry. Dedicated to upholding the public interest, the Commission shapes, administers and enforces City ethics, campaign finance and lobbying laws that ensure Los Angeles elections and government decision making are fair, transparent and accountable.

Contribution Limits Reviewed *(Cont. from Page 11)*

Mayor, City Attorney, and Controller – are limited to \$1000 per person per election.

As part of the City's public matching funds program, candidates agree to abide by expenditure ceilings in exchange for receiving the benefit of partial public financing in their campaigns. For example, spending limits for a qualifying City Council candidate are \$330,000 in a primary and \$275,000 in a general election, while a participating Mayoral candidate agrees to be bound by a spending limit in the primary of \$2,251,000 and a limit of \$1,800,000 for the general election. City law limits an elected official who has an officeholder account fund from spending more than \$75,000 from that account during a fiscal year.

For more detailed information about the Commission's discussion and the basis for its recommendation, check out our Web site to view the March 4 policy and legislation staff memo on the issue.

Los Angeles City Ethics Commission



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