

# The Public Trust

Volume 10, Issue 3

## Gift Limits for City Officials: The Not-So-Secret Santa

As the holiday season has moved into full swing, it is a time to anticipate the year ahead, reflect on the year that's concluding, and to cheerfully share our time, our thanks, and our joy with others. For City officials and those who interact with them, however, this month's festivities are a good opportunity to remind all about gift limits and disclosure requirements and the

important role they play in keeping our governmental decision-making fair and impartial.

Gift restrictions exist to ensure that City officials and employees are, and appear to be, impartial in all matters that come before them. Limiting the amount of gifts that can be given to an official—and from whom an official can receive them—helps ensure that govern-

mental decisions are based only on merits, and not influenced by any perks the decision-maker may have received.

Staying in compliance requires a number of steps, starting with a City official understanding his or her relationship to the gift-giver. Gifts from family members and persons with whom an official has a bona-fide dating relationship, for

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### Next Meeting

February 12, 2007  
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.

## Election Season: Political Neutrality

With 2008 just around the corner and the election season already underway, City officials and employees are reminded to remain politically neutral on all election issues. Of course, it is not unusual that public servants may have strong views on these issues. In fact, this is quite common. However, a City official or employee may not use his or her governmental position to influence an election campaign or the outcome of an election

matter.

The laws that restrict the politically activity of public servants are not intended to exclude anyone from the electoral process. Instead, such laws are in place to protect the integrity of our government by ensuring that City employees and officials always remain nonpartisan and neutral in all election matters while on City time. Political neutrality both preserves the public trust and enables the public to make objec-

tic matters, thereby upholding the laws that were created to promote a free democracy.

In short, remaining politically neutral and non-partisan means providing the public with complete and unbiased information. Equally important, it also means using *all* City resources, including facilities, equipment, supplies, vehicles, uniforms, badges, etc., *solely* for City purposes.

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## Message from the Executive Director

**T**hank you for taking a look at our latest City Ethics Commission newsletter.

In recent months since our last issue, we've committed additional resources here at the Commission to help produce more content and materials for our outreach and educational work than ever before, and to make them more accessible and inviting. It's our hope that this and subsequent publications will provide

up-to-date and educational information so City officials and others can better understand the law and how to comply with it.

It's also important for us at the Ethics Commission that we continue to help communicate the "why?" behind the law as effectively as possible. Whether we're providing technical assistance to callers, developing public policy, or enforcing the law, connecting the law to its purpose is vital. The

laws can be complex, and it's our job to help translate them into understandable terms. As we continue to look for ways to be as effective as possible in this area, we hope you'll feel free to share your thoughts and feedback with us.

With this newsletter, we also are very pleased to welcome to the CEC our newest commissioner, Michael Camuñez. Commissioner Camuñez joined us at the Commission's December meeting,

and all of us at the CEC look forward to working with him to assure City government and elections remain fair, transparent and accountable.

As 2007 comes to a close, we at the Ethics Commission wish you and your loved ones all the best for this Holiday Season, and a happy, healthy and prosperous 2008!



LeeAnn Pelham  
Executive Director

## New Commissioner: Michael Camuñez

**T**he City Ethics Commission welcomed its newest member at its December 2007 meeting. On November 20, Michael Camuñez was unanimously confirmed by the Los Angeles City Council to serve a five year term on the panel. Nominated by Council President Eric Garcetti, Commissioner Camuñez will fill the vacancy created by the expiration of Commissioner Gil Garcetti's term in June 2007.

A Harvard University and Stanford Law School graduate,

Commissioner Camuñez is a partner in the litigation department of the Los Angeles office of O'Melveny & Myers LLP. He represents and counsels companies, boards, and officers in complex commercial litigation and in enforcement matters before the Department of Justice and the Securities and Exchange Commission. Prior to joining the firm, Camuñez worked as a Senior Policy Advisor at the Corporation for National Service, a national agency that provides grants and support for volunteer organizations. During

his tenure there, he served as a founding architect of the national service program AmeriCorps and was a part of the administration-wide Working Group on Welfare Reform. From 1991 to 1993, Camuñez worked for the bipartisan U.S. Commission on National and Community Service, serving as a Program Officer and Director of the National Service Demonstration Program.

Since 2006 until his recent appointment to the City Ethics Commission, Camuñez co-chaired the California



Volunteers Commission with honorary co-chair First Lady Shriver, where he shaped policies to increase volunteer and community service throughout the state. He was initially appointed to the state agency as a commissioner by Governor Davis in 2002 and was

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## Rules for Lobbyist Gift-Giving: Nothin' But a Smile

The passage of Proposition R in November 2006 significantly restricted the ability of lobbyists to give City officials gifts. In many cases, lobbyists cannot give gifts of any value.

As a reminder, a lobbyist is defined under Los Angeles Municipal Code § 48.02 as an individual who, during any three-month period:

- is compensated or is due compensation for 30 or more hours of lobbying activity; and
- and, has at least one direct communication with a City official in an attempt to influence that official on behalf of a client.

"Lobbying activity," as defined above, generally means seeking to influence a third party on municipal legislation by any means and may include conducting research, attending meetings, providing advice or strategy, and making public comments on behalf of a client.

### "am I a lobbyist?"

A lobbyist is prohibited from giving gifts of any value to the following City officials:

- All elected City officers
- All other "high-level officials," which include, among others, members of the Board of Public Works, Ethics Commissioners and Planning Commissioners
- Any City official who is a member of an agency who has jurisdiction over a matter the lobbyist is attempting to influence or has attempted to influence in the reporting period
- Any City official or member of a board or commission if the lobbyist currently has or within the last nine months had a license, permit or other entitlement for use pending before that official or board
- Any City official who is a member of an agency if the lobbyist is seeking to contract with that agency

Even if none of the above apply, a lobbyist needs to determine

whether he or she would be considered a "disclosable source of income" to the City official recipient. This can be determined by asking the official directly, or by reviewing the official's disclosure category in his or her department's Conflict of Interest Code.

If a lobbyist is considered such a source of income, state law prohibits City officials from receiving – and any lobbyist from giving – more than \$390 in gifts during a calendar year.

Additionally, a lobbyist may give gifts of up to \$100 to high-level City officials, his or her spouse and their dependent children for "non-recurring ceremonial occasions." Examples of such occasions include weddings, bar mitzvahs and graduations. Gifts to other City officials for these occasions may be limited to \$390 if the lobbyist is mentioned as a "disclosable source of income" on the official's departmental Conflict of Interest Code. Both high-level and other City officials may also be required to report any these gifts of \$50 or more on their Form 700 .



### Lobbyist Information

Visit our lobbying webpage for access to:

- The City's Municipal Lobbying Ordinance
- Lobbyist Bulletins
- Lists of currently registered lobbyists and their clients
- Lobbying Quarterly Reports
- Lobbying Electronic Filing System

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

## Political Money Laundering: How to Stay out of the Wash

**P**olitical money laundering occurs when an individual or entity reimburses another for a campaign contribution. In addition to substantial fines and possible criminal sanctions, persons who engage in such activity risk being barred from holding any City contract for four years. In short, it is a serious offense.

Imagine the following scenario:

You are a mid-level manager at a manufacturing plant downtown.

One day, the owner of the company, Mr.

Geoff, walks up to your desk and asks you to make a contribution to the mayoral campaign of his favorite candidate.

"But I don't have \$1,000 to spare," you say, remembering the per person campaign contribution limit for such races.

"Don't worry about it," says Geoff. "Just make the contribution and I'll pay you back in a bonus of some kind."

If Geoff follows through on his promise, both of you have effectively engaged in political money laundering.

By reimbursing you for your \$1,000, Geoff is effectively increasing his own contribution to his favorite candidate.

If Geoff repeats this process with 25 employees, and if each gives the maximum, he will have increased his contribution by \$25,000 over his own, legitimate, donation. This type of behavior clearly subverts the contribution limits, and could create the appearance that Geoff's candidate, if elected, could owe Geoff for his generosity.

**"the problem occurs when someone reimburses another for a contribution and the true source of a contribution is concealed"**

Keep in mind that Geoff did nothing improper by asking for a contribution to be made to a City candidate. Fundraising is an integral part of any campaign's ability to communicate effectively with the voters. The problem occurs when someone reimburses another for a contribution and the true source of a contribution is concealed.

Preventing political money laundering – and rigorous enforcement action against those who engage in it – is a main priority for the City Ethics Commission.



Since 2000, the CEC has discovered \$185,723 worth of laundered campaign contributions in seven cases.

As political money laundering is one of the most serious crimes investigated

by the CEC, the fines are substantial. The CEC

has fined both the contributors who allowed themselves to be used to funnel money to candidates – known as conduits – and the companies or individuals that reimbursed those conduits. For the cases the Commission has resolved, the agency has levied fines of \$1,286,315. Some of these persons also were subject to criminal prosecution.

Avoiding such penalties is easy: only make political contributions in your own name, do not reimburse anyone for their contributions, and do not allow anyone to reimburse you for yours.

### 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.



## Campaign Literature: 2009 Election

**C**ampaign literature for the 2009 election is now available online!

First proposed by the City Ethics Commission, Section 49.7.11C of the Los Angeles Municipal Code's Campaign Finance Ordinance now requires that candidates for elective City office and committees submit their campaign literature to the City Ethics Commission as follows:

Candidates	Campaign Literature Requirement
Candidates who <i>are</i> required to open a campaign committee for City elective office	Submit a copy of the mailing or other literature to the City Ethics Commission at the same time the mailing or other literature is given to the post office or otherwise distributed, in the following format: <ul style="list-style-type: none"> <li>• PDF; or</li> <li>• Other electronic format pre-approved by the Commission.</li> </ul>
Candidates who <i>are not</i> required to open a campaign committee for elective City office	Submit a copy of the mailing or other literature to the City Ethics Commission at the same time the mailing or other literature is given to the post office or otherwise distributed, in one of the following methods: <ul style="list-style-type: none"> <li>• Electronically;</li> <li>• By ground mail;</li> <li>• Personal delivery; or</li> <li>• Facsimile.</li> </ul>
Committees	Campaign Literature Requirement
Committees making independent expenditures or member communications in a City election, who send a mailing or distribute more than 200 substantially similar pieces of campaign literature	Submit a copy of the mailing or other literature to the City Ethics Commission at the same time the mailing or other literature is given to the post office or otherwise distributed, in the following format: <ul style="list-style-type: none"> <li>• PDF; or</li> <li>• Other electronic format pre-approved by the Commission.</li> </ul>

To assist committees in meeting this requirement, the CEC has added a new online feature to its Campaign Electronic Filing System (CEFS). CEFS now allows candidates and committees to upload PDFs of their campaign literature, and allows the public to search for and view these uploaded files.

To search campaign literature for the 2009 election, visit the following link, [http://ethics.lacity.org/efs/public\\_Cmp\\_Lit\\_search.cfm](http://ethics.lacity.org/efs/public_Cmp_Lit_search.cfm), or visit the Campaign Finance page at the CEC's main website, <http://ethics.lacity.org>.



## The Ethics Advisor: How to Keep Your Halo in the City of Angels

Dear Ethics Advisor,

*Six months ago, I left my job as a Council legislative deputy to work for a consulting firm that often lobbies City agencies. Though I was not designated as a "high-level" official in my office, another person in my office, who left at the same time as me, was such an official. Is there anything I can do at my new job that he cannot?*

*Waiting in the Lobby*

**D**ear Mr. Lobby,

As you correctly intuited, different rules apply to those designated as "high-level" officials than others who do not have that designation. Only a relatively few positions, including elected City officials, Planning Commissioners, and Ethics Commissioners, are considered high-level officials for purposes of the City's ethics laws. You can check out the full list of these positions by going to [http://ethics.lacity.org/PDF/report\\_cityOfficial.pdf](http://ethics.lacity.org/PDF/report_cityOfficial.pdf)

Though you may have fewer restrictions than your friend, there are several key things you need to keep in mind. For a year after leaving City service, you may not be compensated to communicate directly or indirectly with your former Council office or the Councilmember for the purpose of influencing

any action. This includes public testimony before that Councilmember.

During that one year period, however, you are permitted to receive compensation to communicate with another Councilmember or City agency – unless the issue under discussion is something you were personally and substantially involved with while you worked in that office. In addition, you may discuss with your new employer how others at your new firm may communicate with your former Councilmember, but that only applies to issues with which you were not personally and substantially involved. Also, your new firm may not act as your agent when communicating with your former Council office.

Your friend, the high-level official, is considerably more restricted in his post-City service activities. For one year

following his service, he is prohibited from being compensated to communicate with *any* Council office or City agency for the purpose of influencing any action. Like you, he is allowed to discuss strategy on pending issues with other members of the firm as long as he was not personally and substantially involved in the issue being discussed. If you have further questions about post-City employment, or if you are not sure whether you were "personally and substantially" involved in a particular matter, please contact the City Ethics Commission 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](http://ethics.lacity.org/Advice/advice_index.cfm)

## Gift Limits for City Officials *(Continued from page 1)*



example, are not restricted, nor do they need to be reported under City law.

City officials, however, *are* limited in what they can receive from certain other parties. These rules are detailed below. Of course, City officials may never accept gifts that are intended to influence their decision-making.

### Lobbyists and Lobbying Firms

Rules regarding gifts from lobbyist and lobbying firms are the most restrictive. Since the passage of Proposition R in November 2006, "high-level" officials – which City law defines to include elected officials, staff members designated as such by elected officials, members of the Board of Public Works, Ethics Commissioners and Planning Commissioners – cannot receive a gift of

any value from *any* registered lobbyist, lobbying firm or lobbyist employer. For a complete list of positions defined as "high-level officials," see the City's Governmental Ethics Ordinance at Los Angeles Municipal Code section 49.5.2, which can be accessed on the Commission's website at [http://ethics.lacity.org/PDF/law\\_geo.pdf](http://ethics.lacity.org/PDF/law_geo.pdf).

If a lobbyist or lobbying firm lobbies a City official's agency, that entity may not make a gift of any value to that City official. (See the Commission's website at <http://ethics.lacity.org/lobby/lobby.cfm> for updated registration lists.)

### Other "Restricted Sources"

If the potential source of a gift is not a lobbyist or lobbying firm, you may still be restricted from accepting the gift. The next question to ask in this case is whether the giver is another type of "restricted source." City officials can determine whether someone is a restricted source by asking a series of questions:

- Is the person doing or seeking to do business with the official's agency?
- If the giver is a company, is that company required to register as a lobbyist employer?
- Has the giver attempted to influence the official on any City matter, even if he or she is not a registered lobbyist?
- Does the giver have any matter involving a license, permit or other entitlement for use pending before the official, or was there such a matter pending before that official in the last nine months?

If the answer to any of the above is yes, the giver is considered a restricted source to that official. City officials may not receive more than \$100 in gifts from a restricted source per calendar year. Remember, restricted sources are defined more broadly for high-level officials.

To see how City law defines a restricted source for particular officials, see LAMC sec. 49.5.2. at [http://ethics.lacity.org/PDF/law\\_geo.pdf](http://ethics.lacity.org/PDF/law_geo.pdf).

### "Disclosable Sources of Income"

Even, if the giver is neither a lobbying entity nor a restricted source, a City official still needs to determine whether the gift source is considered a "disclosable source of income" to him or her. To determine this, City officials can consult their department's Conflict of Interest Code.

This Code identifies, by position, what type of sources of income a particular City official needs to disclose because he or she has authority to make or participate in decisions that could affect those sources. If the disclosure category requires the City official to disclose income from a particular type of source, then state law limits that City official to accepting no more than \$390 per calendar year from that source.

The Conflict of Interest Code for the City's Animal Services Department, for instance, requires the department's Chief Veterinarian to report any investment or income from any Los Angeles

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**Gift Limits** (Continued from page 7)

business entity that commercially breeds or boards animals. Any gifts he or she receives from such an entity would be limited to \$390, helping to ensure that the Chief Veterinarian is not compromised – and does not even appear to be – by accepting gifts from those who could have matters pending before that official.

**"...gift restrictions hinge on source and value"**

apply. As stated earlier, gifts from family members or partners in a bona-fide dating relationship are not limited or reportable. Similarly, gifts received that are not kept or are donated to a charitable organization are exempted if they are donated within 30 days and the City official does not take a tax deduction for making the donation.

**Valuing Gifts**

As many of the gift restrictions hinge on source and value, it is important to determine the value of the gift. This helps City officials understand whether or not they are allowed to accept that gift so they can stay in compliance with the laws.

City officials are required to report a good faith estimate of the item's fair market value if it is \$50 or more, on their Statement of Economic Interests (Form 700). The easiest way to determine a gift's value is to ask the giver. If that is not possible, it is acceptable to check out the value of similar items at a store or on the internet.

**Exceptions**

There are a number of exceptions that can

For example, if a registered lobbyist who lobbies a City official's agency gives the official a fruit basket worth \$45, that City official needs to return it or turn it over to a charitable organization. Consuming the fruit, sharing it with coworkers, or giving it to another office or organization that is not a non-profit, would constitute acceptance of the gift.

Further, for purposes of gift restrictions, state law considers a ticket to a political fundraising event to have no value. The ticket, therefore, is neither restricted nor reportable by the official who receives it. Similarly, state law also does not restrict tickets to events that are fundraisers to benefit 501(c)(3) non-profit organizations. Because state

laws in this area can be complex, it's always best to ask rather than assume a ticket to an event is unrestricted.

There also are some exceptions to gift rules when it comes to "non-recurring ceremonial occasions," such as weddings, bar mitzvahs, and graduations. For instance, a City official is allowed to receive a wedding gift valued at less than \$100 presented to that City official or a member of his or her immediate family. These gifts may be reportable if valued over \$50, and City officials are still prohibited from receiving gifts valued over \$100 from restricted sources.

The City Ethics Commission is committed to helping City officials and employees understand their requirements under the law. For questions regarding gifts or any of the laws the Commission administers or enforces, call (213) 978-1960. You may also contact the City Attorney's office if you have a question about gifts.



**Lobbying Registration Reminder!**

All lobbying registrations will terminate on **12/31/07.**

Anyone who qualifies as a lobbyist in 2008 will be able to re-register starting on **1/02/08.**

To register please visit our website at:

<http://ethics.lacity.org/efs2003/>

**Stay informed!**

Subscribe to "The Public Trust" newsletter and CEC bulletins at:

[http://ethics.lacity.org/newsletter/simple\\_send\\_signup.cfm](http://ethics.lacity.org/newsletter/simple_send_signup.cfm)

## Election Season *(Continued from page 1)*

The CEC's primary goal, when it comes to political activity, is to educate City officials, employees, and the public on how to ensure compliance.

The table to the right lists a few examples of *some* of the types of political activities that are allowed and restricted for City officials and employees.

For additional rules that apply to general managers and commissioners, please go to the following URL: <http://ethics.lacity.org/newsletter/issues/fall2006/3-activitiesreminder.cfm>.

Because this article only outlines examples of *some* of the types of political activities that you may encounter, please contact us at (213) 978-1960 for advice on your specific situation.



### EXAMPLES OF ALLOWED POLITICAL ACTIVITIES

- Participating in campaign activities during a City official's or employee's personal time, using non-City resources;
- Soliciting political contributions from persons other than City officials or employees on behalf of candidates or ballot measures, as long as City time and resources are not involved; and
- Using City resources only to provide neutral, unbiased, and accurate information to members of the public who ask for that information.

### EXAMPLES OF RESTRICTED POLITICAL ACTIVITIES

- Using or authorizing the use of City offices, stationery, telephones, vehicles, equipment or other City property for campaign activities, including fundraising for or against a candidate or ballot measure. (The term "ballot measure" is intended to include a bond measure);
- Receiving, delivering, or attempting to deliver a political contribution in City Hall, a City office building, or an office for which the City pays the majority of the rent;
- Participating in political activities while in uniform;
- Engaging in campaign activities during hours for which you are paid by the City to engage in City business;
- Knowingly soliciting contributions for or against a political candidate or ballot measure from any City official or employee. This includes officials and employees who are on a leave of absence. (Soliciting a contribution from the spouse of a City official or employee is permissible so long as it is not a subterfuge for soliciting the City official or employee); and
- Pressuring City officials or employees to support or oppose candidates or ballot measures.

## 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>; or
- **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.

**Commissioner Camuñez** *(Continued from page 7)*

reappointed by Governor Schwarzenegger in 2005.

Commissioner Camuñez is also a member of the Board of Visitors of Stanford Law School, the Chancery Club of Los Angeles, the Pacific Council on International Policy, and is a Trustee of the Mexican-American Bar Foundation. Additionally, he was a founding board member of Democratic Leadership for the 21st Century in Los Angeles, as well as an at-large California delegate to the 2000 Democratic National Convention.

Upon his appointment Camuñez stated, "I'm very honored to have the opportunity to serve the City and people of Los Angeles on the Ethics Commission. I believe passionately that an open, transparent and honest political process is the hallmark of a great democracy - it's what sets us apart as a nation. I feel privileged to have the chance to serve my community in this way, and I look forward to being a part of thoughtful reform efforts designed to ensure the public's confidence in the integrity of both our

elections and our local government."

The City Ethics Commission consists of a five-member panel of part-time volunteers, each of whom is appointed by a different elected official: the Mayor, Council President, Council President Pro Tem, City Attorney, and Controller.

As an independent voice for more open and responsive City government, the charter-based 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 to ensure City elections and government decision-making are fair, open and accountable.

Commissioner Camuñez will serve on the City Ethics Commission through June 30, 2012.

**Just for Fun!**

**Ethics Term Search**

Search the puzzle below for the key "ethics" terms used throughout this newsletter!



**Key Terms:**

- ACCOUNTABILITY
- ADVICE
- CAMPAIGN
- CONFLICT OF INTEREST
- CONTRIBUTION
- DISCLOSURE
- DONATION
- ELECTION
- ETHICS
- GIFT
- HONESTY
- IMPARTIALITY
- LIMITS
- LOBBYING
- LOS ANGELES
- TRANSPARENCY
- TRUST

**Our Commissioners:**

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*President*

**Robert Saltzman**  
*Vice President*

**Bill Boyarsky**

**Helen Zukin**

**Michael Camuñez**

**Our Key Staff:**

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*Enforcement & Legal Affairs*

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*Director,*  
*Policy & 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.

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