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# LOS ANGELES CITY ETHICS COMMISSION

## N E W S

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**For Immediate Release:  
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### **PUBLIC ACCUSATION ALLEGES INDEPENDENT EXPENDITURE DISCLOSURE VIOLATIONS IN 2009 CITY ATTORNEY RACE**

#### **Accusation Issued by City Ethics Commission Director Initiates Formal Enforcement Proceeding**

According to a public accusation issued today by the Executive Director of the Los Angeles City Ethics Commission, probable cause exists to believe that Laurel Dickranian violated City independent expenditure disclosure laws in three instances during the 2009 election cycle by failing to report to the City Ethics Commission an independent expenditure she made to support then-City Attorney candidate Michael Amerian within 24 hours, failing to submit a copy of the campaign communication, and failing to comply with disclaimer and disclosure requirements for independent expenditure communications.

The public accusation released today charged Ms. Dickranian with violating Los Angeles Municipal Code (“LAMC”) sections 49.7.26(A) and 49.7.11(C) when she failed to report to the Commission an independent expenditure in the amount of \$7,924 within 24 hours and submit to the Commission a copy of her letter supporting City candidate Amerian at the time 17,845 copies of the letter were distributed. The accusation also charged Dickranian with violating Los Angeles City Charter section 470(l) when she failed to comply with disclaimer requirements established by ordinance by failing to include on the communication language stating that she paid for the communication and that the communication was not authorized by a city candidate.

LAMC section 49.7.26(A) requires any person who makes an independent expenditure of more than \$1,000 supporting or opposing any candidate for City office to notify the City Ethics Commission with 24 hours each time one or more payments meeting that threshold are made. LAMC section 49.7.26(B) requires that the person making the independent expenditure must also file with the Commission a copy of the communication, if in print format, or a copy of the script or recording, if the communication is in telephonic, video, or radio format.

LAMC section 49.7.11(C) requires each non-candidate controlled committee that mails or distributes more than 200 substantially similar pieces of campaign literature to send a copy of the mailing or literature to the City Ethics Commission “at the time the mailing or other literature is given to the post office or otherwise distributed.” City Charter section 470(l) requires persons or organizations who make independent expenditures supporting or opposing City candidates to include specific disclaimers established by ordinance in all campaign communications, regardless of type. LAMC section 49.7.26.3(A) requires any committee that pays for a campaign communication to print the words “Paid for by” anywhere within the communication, immediately followed by the committee’s name, address, and city,

while LAMC section 49.7.26.3(B)(1) requires independent expenditure communications to also include the phrase “Not authorized by a City candidate.”

According to City law, following a finding of probable cause, the Executive Director must make a public announcement of the Accusation. Under the City Charter, the City Ethics Commission board then has the responsibility to determine whether the alleged violations occurred, and, if so, what penalty should apply. A public evidentiary hearing by the Commission must be held to determine if a violation has occurred. The Commission may 1) conduct its own hearing, 2) hear the matter itself with a hearing officer presiding or 3) refer the matter to an outside hearing officer.

The charges go now to the Ethics Commission board for a procedural determination about how it will choose to hear the matter. Ms. Dickranian is presumed innocent of any violation of City law, unless and until such time that the violation is proved in an administrative hearing held pursuant to City Charter Section 706(c). If the Commission determines that a violation has occurred, the maximum penalty that can be levied is \$5,000 for each violation or three times the amount that was not properly reported, whichever is greater.

The Commission and its staff may not comment on this matter until after a final determination has been made. For a copy of the Accusation, please contact the Commission at (213) 978-1960.

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