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# *Item 11*

## **Information**

### *Quarterly Lobbying Summary*

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**Executive Summary:** This item presents a summary of activities reported to the Ethics Commission by lobbying entities for the third quarter of 2019.

**Recommended Action:** This item is for informational purposes only.

**Authors:** Heather Holt, Executive Director  
Mark Low, Lobbying Program Manager

**Presenter:** Mark Low, Lobbying Program Manager

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# *Lobbying Summary: 3rd Quarter 2019*

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## **A. Introduction**

The Municipal Lobbying Ordinance (MLO) regulates persons who receive compensation to lobby City officials. Los Angeles Municipal Code (LAMC) §§ 48.01, *et seq.* In LAMC § 48.01(B), the MLO makes several findings regarding lobbying activity, including the following:

1. Citizens have a right to know the identities of those who attempt to influence City decisions;
2. Public disclosure by lobbyists and their clients regarding their lobbying activities is essential to citizen confidence in the integrity of local government;
3. It is in the public interest to ensure that lobbyists do not misrepresent facts or their positions;
4. It is in the public interest to ensure that lobbyists do not place City officials under personal obligation to themselves or their clients.

To help ensure adequate and effective disclosure regarding efforts to lobby City government, lobbying entities are required to file quarterly disclosure reports. *See* LAMC §§ 48.01(B)(6), 48.08. This item summarizes information disclosed on the lobbying reports filed for the third quarter of 2019.

## **B. Legal Background**

### 1. Definitions

The MLO defines lobbying activity generally as compensated conduct related to communications with City officials that are designed to influence municipal matters. LAMC § 48.02. The lobbying entities that are regulated by the MLO include lobbyists, lobbying firms, and lobbyist employers.

A lobbyist is an individual, regardless of title, who is compensated to spend 30 or more hours in a three-month period to engage in lobbying activities that include at least one direct communication with a City official or employee that is designed to influence a City matter on behalf of another person. *Id.* A lobbying firm is an entity that is entitled to receive \$1,000 in compensation for engaging in lobbying activities on behalf of another person during a three-month period, if a partner, owner, shareholder, or employee of the entity qualifies as a lobbyist. *Id.* A lobbying firm may be an individual lobbyist. Finally, a lobbyist employer is an entity that employs a lobbyist in-house to lobby on the entity's behalf. *Id.*

Certain persons are exempt from the lobbying regulations. These include individuals acting in an official government capacity, newspapers and other media outlets that publish editorials or paid advertising, persons whose only activity is bidding on a City contract, and 501(c)(3) organizations that receive government funding and are created to provide direct services to indigent persons. LAMC § 48.03.

## 2. Registration and Reporting

Lobbyists and lobbying firms are required to register with the Ethics Commission on an annual basis. LAMC §§ 48.07(A)-(B). Registration is required within 10 days after the end of the month in which the qualification threshold is met. LAMC § 48.07(A). The fees for each year's registration are \$450 per lobbyist plus \$75 for each client from whom the lobbyist is entitled to receive \$250 or more in a calendar quarter. LAMC § 48.07(C).

Each lobbying entity is required to file a disclosure report for every calendar quarter in which it qualifies as a lobbying entity. LAMC § 48.08(A)(1). Lobbying entities must continue to submit quarterly reports until registration is terminated, either voluntarily or automatically by virtue of the end of the calendar year. The disclosure reports must contain specific information, including the following:

- a. Each City agency that a lobbyist attempted to influence. LAMC §§ 48.08(B)(12), 48.08(C)(14).
- b. Each municipal matter that a lobbyist employer attempted to influence. LAMC § 48.08(D)(6).
- c. Total payments from clients to lobbying firms. LAMC § 48.08(C)(4).
- d. Total payments to lobbyists by lobbying firms and lobbyist employers. LAMC §§ 48.08(C)(7)(a), 48.08(D)(3).
- e. The elected City officials, candidates, and committees for which a lobbyist engaged in fundraising activity, as well as the dates of the activity and the amount of money raised. LAMC §§ 48.08(B)(7), 48.08(C)(9), 48.08(D)(10).
- f. Services provided by a lobbyist to a City candidate or ballot measure campaign or to the City under contract, including the amount of compensation received for those services. LAMC §§ 48.08(B)(10)-(11), 48.08(C)(12)-(13).

## 3. Prohibited Activities

Lobbying entities are prohibited from engaging in certain types of activity. They may not attempt to deceive City officials. LAMC §§ 48.04(B), (D). They may not place City officials under personal obligation to them. LAMC § 48.04(A). They may not create a municipal matter for the purpose of being retained to lobby on that matter. LAMC § 48.04(C).

Lobbyists and lobbying firms are also limited in certain financial activities. They may engage in fundraising, but they may not make campaign contributions to elected City officials, candidates, or their committees if they are required to be registered to lobby the office the official or candidate holds or seeks. Los Angeles City Charter § 470(c)(11). And they may not make or act as an intermediary in the making of a gift to a City official. LAMC §§ 48.04(E), 49.5.8(A)-(C).

### **C. Third Quarter Compliance**

In the third quarter of 2019, there were 489 registered lobbyists and 146 registered lobbying firms, including 55 sole proprietorships. In addition, there were 85 lobbyist employers.

These 720 lobbying entities were required to file 665 disclosure reports for the third quarter (the 55 sole-proprietor lobbyists were required to file a lobbying firm report but not a lobbyist report). A total of 654 reports (98.3 percent) were filed on time. Penalties totaling \$450 were collected in connection with reports filed past the October 31, 2019 deadline. Two outstanding reports (for a lobbyist and for a lobbying firm) remain unfilled

### **D. Top 10 Highest Paid Lobbying Firms**

Lobbying firms are required to report the total amount of payments they receive each quarter from the clients they represent. A total of \$17,913,968 in payments from clients was reported by all lobbying firms for the third quarter of 2019.

The ten firms that reported the highest total payments from clients are identified in the table on the following seven pages. Each of the top ten firms reported receiving at least \$400,000 from clients in the third quarter. Together, the ten firms reported receiving a total of \$8,775,399, which represents 49 percent of all payments from clients reported by all lobbying firms for the third quarter of 2019.

## TOP 10 HIGHEST PAID LOBBYING FIRMS

*Based on Client Payments Reported as Received In 2019 Q3*

Rank & Payments	Firm & Clients
1. \$2,044,356	<p><b>Englander Knabe and Allen (including three6ty)</b></p> <p>1784 Capital Holdings, LLC 202 Main, LLC 3 Space 4G Wireless, Inc. 5959 LLC 7040 Van Nuys Partnership LLC 9355 Culver &amp; Associates LLC Accela, Inc. Advocates for Fairness in Transportation Airport Terminal Services, Inc. Alimentari, Angelini Alliance Residential Company American Communities, Inc. American Golf Corporation American Technology Solutions American Wood Council AmPLY Power Anthem, Inc. APPA Real Estate Aragon Properties, Ltd AT&amp;T Enterprise Services (AT &amp; T and its affiliates) Avaya, Inc. Avisare Corporation Back Lot LLC Barlow Respiratory Hospital BCG Lodi Homes LLC Beach City Capital Ben Leeds Properties Bergin's Public House Billie Lourd Black Equities Group Blue Label Construction BNSF Railway Company</p> <p>Boardwalk Property Development, LLC Boingo Wireless, Inc. Bold Partners LLC Bolour Associates Boos Development West, LLC Brasa Capital Bronson Holdings, LLC BYD CA, Inc. CalBay Development, LLC Calcrete Construction California Trucking Association Calmet Corp. CGI Strategies CIM Group Cityview LLC Clark Construction Group - California, LP Clay Lacy Aviation Clear Vision Management, LLC Coca Cola Bottling USA Comstock Homes Conduent Core/Related Grand Ave Owner, LLC Crescent Capital Partners LLC Crews of California, Inc. Curson Capital Cynthia Ambuehl Diamont Deckard Technologies Decro Corporation Deloitte Consulting LLP Delta 9 THC Devlin Land Group Dominick DiBartolomeo Dyvinel Inc. EAH Housing East LA Community Corp EBEAG Properties LLC</p> <p>Elevado Group Elkwood Elliot Megdal &amp; Associates Elsey Partners Empire Property Group LLC Ensemble Investments Enterprise Rent-A-Car Company of Los Angeles Far Field Brewing Company Fenix Marine Services Fifteen Group / Art Colony Property LLC Firestone Walker Brewery Foxpoint Media, LLC Geneva Street Partners Genius Fund Giannotta, Steven Gillis Family Partnership Glaser Weil Gohar Afifi GSW Creative Corporation dba dosist GTM Holdings LLC Hanover Financial LLC Haven HDR Engineering, Inc. Healthy Spot LLC Hi Hi Heel Productions Hillcrest Beverly Oil Corporation Hillel 818 Hollenbeck Palms Independence Healthcare Management Indus Holding Company Irvine Asset Group LLC Jamison Properties LP Japanese American Cultural &amp; Community JB Builders Jewish Federation of Greater LA Johnson Development Associates Inc JSM Design KansasEXP-LA, LLC</p>

**TOP 10 HIGHEST PAID LOBBYING FIRMS (cont'd)**

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Seaview Investors, LLC Seazen AHC 1375LLC</td> </tr> <tr> <td>Katchko, Vitiello, Karikomi, PC on behalf of their client Southern California Collective</td> <td>MM Enterprises USA, LLC Molasky Ventures, LLC Moss &amp; Company Murray, Todd N N N Productions</td> <td>Shaun T Jaenick LLC Silver, Scott Silver Hill Properties LLC Silver-Lake Arc LLC Skinny Labs Inc., dba Spin</td> </tr> <tr> <td>Katchko, Vitiello, Karikomi, PC on behalf of their client Universal Collective</td> <td>National Strategies, LLC on behalf of Avtec, Inc. 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	12001 Pico Property, LLC	CoreSite	ONNI Group Contracting (California) Inc.
	2800 Casitas LLC	Devenney Group, Ltd.	OSIB LA Downtown Properties, LLC
	4454 Van Nuys, LLC	District Square LLC	Pacific Storage
	600 San Pedro LP	EAH Housing	Palisades Capital Partners
	6104 Hollywood, LLC	Electric Pointe, LP	PATH Ventures
	6th & Alameda LLP	Equity Office	Precision Development Company
	7006 Van Nuys, LLC	Equity Residential	PSS West L.A., LLC
	8008 Third Street Investments	Faring Capital, LLC	RAR2-Villa Marina Center CA, LLC
	Academy of Motion Picture Arts & Sciences	FF Realty IV LLC	Regalian, LLC
	ACC OP Development LLC	Frost/Chaddock Developers, LLC	Related California
	AEG	G.H. Palmer	SeaZen-AHC 1375, LLC
	American Commercial Equities	Glassell Park, LLC	Sonder
	Amoroso Company	Griffin Opportunities, LLC	Spectrum Group Real Estate
	Aragon (Sunset/Everett) Properties Corp.	IMT Capital LLC	Spieker Realty Investments
	Artisan Realty Advisors	International Equity Partners	Sunrise Senior Living
	Bel Air Country Club	Jade Enterprises	Sutter, Gary & Vera
	Belmont Village Senior Living	Jamison Properties, LP	The Buckley School
	BLT Enterprises	Johnson Development	The Community Builders Group
	Bolour	Karma Company, LLC	The Hanover Company
	Brookfield Properties Development LLC/Forest City	Knight Restaurant Group, Inc.	The HQ Group
	BWC/St. Adnrews LP	LA Hollywood Properties LLC	The Mirman School
	Caladan Investments LLC	La Terra Development, LLC	The Pews at SC LLC
	California Landmark	Landmark Properties, Inc.	The Richman Group California Development Company
	Calvary Christian School	LeFrak	Tishman Speyer
	Camden USA, Inc.	Lenmar Beverly Glen LLC	Trammell Crow
	Campbell Hall School	Leon Capital Group	TriCal Construction
	Chelsea Investment Corp.	Lincoln Property Company	TriStar Realty Group, LLC
	CIM Group	Lizard Capital LLC	Uncommon Development
		LJ Properties, Inc.	Universal Standard Housing
		Lowe Enterprises Real Estate Group	University of Southern California
		Marlborough School	Vantage Property Investors
		MCRT Investments LLC	VisionQuest
		Mercy Housing	Welbrook Senior Living
		MGA North LLC	Westmark School
		MLM Group LLC	WH Hotel, LLC
		Next Century Associates, LLC	Wilshire Skyline, Inc.
		North New Hampshire Partners, LLC	WNMS Properties, Inc.

## TOP 10 HIGHEST PAID LOBBYING FIRMS (cont'd)

*Based on Client Payments Reported as Received In 2019 Q3*

Rank & Payments	Firm & Clients																																																																										
5. \$790,283	<p><b>Craig Lawson &amp; Co., LLC</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">1200 S. Figueroa LLC</td> <td style="width: 33%;">Hudson Pacific</td> <td style="width: 33%;">R.D. Olson Development</td> </tr> <tr> <td>1614 Temple LLC</td> <td>Ikar</td> <td>Red Hook Capital Partners</td> </tr> <tr> <td>3800 West Sixth Street LLC</td> <td>Ivy Station LLC</td> <td>Rexford Industrial Realty</td> </tr> <tr> <td>A Community of Friends</td> <td>Jade Enterprises</td> <td>Rodeo Properties LLC</td> </tr> <tr> <td>Abode Communities</td> <td>Jamison California Market Center</td> <td>Samko LLC</td> </tr> <tr> <td>Acon Development</td> <td>Jamison Properties LP</td> <td>Sandstone Properties</td> </tr> <tr> <td>AD Sharp US</td> <td>Kaiser Foundation Health Plan Inc.</td> <td>Skid Row Housing Trust</td> </tr> <tr> <td>Amidi Group</td> <td>Little Tokyo Service Center</td> <td>SRO Housing Corp.</td> </tr> <tr> <td>Augustson Family Trust</td> <td>Mercy Housing</td> <td>Strategic Legacy Investment Group</td> </tr> <tr> <td>B &amp; F Associates</td> <td>Meta Housing</td> <td>Temple Israel of Hollywood</td> </tr> <tr> <td>Century Housing</td> <td>Mirae-LA, LLC</td> <td>The City Market of Los Angeles</td> </tr> <tr> <td>Chelsea Investment Corp.</td> <td>Mitsui Fudosan America</td> <td>The Hanover Company</td> </tr> <tr> <td>CIM Group</td> <td>Museum Associates</td> <td>Topa Management Co.</td> </tr> <tr> <td>Darden Corp.</td> <td>Music Box Building Co., LLC</td> <td>Triumph Management</td> </tr> <tr> <td>Decro Corporation</td> <td>National Community Renaissance of CA</td> <td>TTL Management Inc.</td> </tr> <tr> <td>Equity Residential</td> <td>National Real Estate Development LLC</td> <td>Universal Villas LLC</td> </tr> <tr> <td>Flexible PSH Solutions</td> <td>Nuveen Real Estate</td> <td>Value Schools</td> </tr> <tr> <td>FN Property Investment</td> <td>Palisades Capital Partners LLC</td> <td>Vermont Real Estate Properties LLC</td> </tr> <tr> <td>Freeman Group</td> <td>Para Los Ninos, Inc.</td> <td>Wakeland Housing &amp; Development</td> </tr> <tr> <td>Goodman North America</td> <td>PariSel LLC</td> <td>Walter N Marks Inc</td> </tr> <tr> <td>Greenland US Holding Co.</td> <td>Puente Learning Center</td> <td>Weingart Center</td> </tr> <tr> <td>Harry's Auto Body Inc</td> <td></td> <td>Wolf Rifkin Shapiro Schulman &amp; Rabkin LLP</td> </tr> <tr> <td>Holland Partners</td> <td></td> <td></td> </tr> <tr> <td>Hollywood Forever Inc.</td> <td></td> <td></td> </tr> </table>			1200 S. Figueroa LLC	Hudson Pacific	R.D. Olson Development	1614 Temple LLC	Ikar	Red Hook Capital Partners	3800 West Sixth Street LLC	Ivy Station LLC	Rexford Industrial Realty	A Community of Friends	Jade Enterprises	Rodeo Properties LLC	Abode Communities	Jamison California Market Center	Samko LLC	Acon Development	Jamison Properties LP	Sandstone Properties	AD Sharp US	Kaiser Foundation Health Plan Inc.	Skid Row Housing Trust	Amidi Group	Little Tokyo Service Center	SRO Housing Corp.	Augustson Family Trust	Mercy Housing	Strategic Legacy Investment Group	B & F Associates	Meta Housing	Temple Israel of Hollywood	Century Housing	Mirae-LA, LLC	The City Market of Los Angeles	Chelsea Investment Corp.	Mitsui Fudosan America	The Hanover Company	CIM Group	Museum Associates	Topa Management Co.	Darden Corp.	Music Box Building Co., LLC	Triumph Management	Decro Corporation	National Community Renaissance of CA	TTL Management Inc.	Equity Residential	National Real Estate Development LLC	Universal Villas LLC	Flexible PSH Solutions	Nuveen Real Estate	Value Schools	FN Property Investment	Palisades Capital Partners LLC	Vermont Real Estate Properties LLC	Freeman Group	Para Los Ninos, Inc.	Wakeland Housing & Development	Goodman North America	PariSel LLC	Walter N Marks Inc	Greenland US Holding Co.	Puente Learning Center	Weingart Center	Harry's Auto Body Inc		Wolf Rifkin Shapiro Schulman & Rabkin LLP	Holland Partners			Hollywood Forever Inc.		
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6. \$608,280	<p><b>Michael Bai</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Alameda Industrial Medical Group</td> <td style="width: 33%;">Holland &amp; Knight</td> <td style="width: 33%;">Los Angeles Equestrian Center</td> </tr> <tr> <td>Atlas Capital Group</td> <td>Jamison Services, Inc.</td> <td>PIMA</td> </tr> <tr> <td>Bando Dela Corp.</td> <td>Jia Long Real Estate Development</td> <td>Public Storage</td> </tr> <tr> <td>Capri Urban Baldwin LLC</td> <td>Kim, Young</td> <td>Sabah, Dan</td> </tr> <tr> <td>Choi, Lana</td> <td>LA Gateway, LLC</td> <td>Samitaur Constructs</td> </tr> <tr> <td>Clear Channel</td> <td>Lincoln Property Company West</td> <td>Sea Urchin Lounge LLC</td> </tr> <tr> <td>CTI Housing</td> <td></td> <td>SM Entertainment LA</td> </tr> <tr> <td>Ha, Kee Whan</td> <td></td> <td>Sushi Nozawa Group</td> </tr> <tr> <td></td> <td></td> <td>Walter J. Company</td> </tr> </table>			Alameda Industrial Medical Group	Holland & Knight	Los Angeles Equestrian Center	Atlas Capital Group	Jamison Services, Inc.	PIMA	Bando Dela Corp.	Jia Long Real Estate Development	Public Storage	Capri Urban Baldwin LLC	Kim, Young	Sabah, Dan	Choi, Lana	LA Gateway, LLC	Samitaur Constructs	Clear Channel	Lincoln Property Company West	Sea Urchin Lounge LLC	CTI Housing		SM Entertainment LA	Ha, Kee Whan		Sushi Nozawa Group			Walter J. Company																																													
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**TOP 10 HIGHEST PAID LOBBYING FIRMS (cont'd)**

*Based on Client Payments Reported as Received In 2019 Q3*

Rank & Payments	Firm & Clients		
7. \$572,726	<p><b>Latham &amp; Watkins LLP</b></p> <p>5601-5667 Santa Monica Blvd (LA) Owner LLC                      5929 Sunset (Hollywood), LLC and CIM Group, LP                      Aerial Rapid Transit Technologies LLC                      Apartment Investments &amp; Management Company ("AIMCO")                      Archer School for Girls                      Boething - Treeland                      Caruso Affiliated                      CH Palladium, LLC                      Clear Channel Outdoor CORE/Related Grand Ave JV, LLC                      Crescent Heights                      Dynamic Development Company, LLC                      Forest Lawn Memorial Park Assn</p> <p>Grit RE, LLC                      Healthy Spot LLC                      Heart Olive, LLC                      Honeywell International, Inc.                      Hudson Pacific Properties, Inc.                      J. Paul Getty Trust                      JMB Realty Corporation (AKA: AP Properties)                      Karney Properties Co.                      Kayne Anderson Real Estate Advisors                      KIPP SoCal Public Schools                      LAFC Sports, LLC                      Los Angeles Dodgers LLC                      Loyola Marymount University                      Majestic Realty Co.                      McCourt Partners LLC                      Mitsui Fudosan America, Inc.                      Nant Media Holdings, LLC                      NBCUniversal Media, LLC                      Pacific Maritime Association</p> <p>Paramount Studios                      Phase IIC Owner, LLC                      Phase III Owner, LLC                      Providence Tarzana Medical Center                      SBLP Development LLC                      Sierra Canyon High School Foundation                      SM 10000 Property, LLC                      The Buckley School                      The Charles Company and M. &amp; A. Gabaee, LP                      The Charles Company, M. &amp; A. Gabaee, LP, Metropolitan Square, Inc. and District Square, LLC                      Tribune Media Company                      University of Southern California                      Vella Group/VE Equities LLC                      Westfield, LLC                      Wilshire Gayley, LLC</p>		
8. \$510,503	<p><b>Mercury Public Affairs</b></p> <p>American Airlines                      American Beverage Association                      Anacostia Rail Holdings Co. (Pacific Harbor Line)                      Bird Rides, Inc.                      BMG Money, Inc.                      California Restaurant Association                      CalPortland Company</p> <p>Charter Communications Operating LLC                      Clear Channel Outdoor, Inc.                      Comcast DFS Group LP                      EEL Holdings LLC                      FedEx Corporation                      Frost Chaddock                      HMS Host Corporation                      Meruelo Group                      Microsoft Corporation                      Motion Picture Association, Inc.</p> <p>NBCUniversal Media                      NFI Industries                      Pacific Charter School Development                      Puzzle Group Law Firm                      Republic Services                      SoCalGas - Sempra Energy                      Tetra Tech                      Tribune Real Estate Holdings, LLC                      Watt Investment Partners                      Westwood Senior Housing, LLC</p>		
9. \$457,744	<p><b>TChoi and Associates</b></p> <p>Chick-Fil-A                      Englander Knabe &amp; Allen on behalf of 202 Main, LLC</p> <p>Englander Knabe &amp; Allen on behalf of 4G Wireless, Inc.</p> <p>Englander Knabe &amp; Allen on behalf of Boardwalk Property Development LLC                      Englander Knabe &amp; Allen on behalf of Boos Development</p>		

**TOP 10 HIGHEST PAID LOBBYING FIRMS (cont'd)**

*Based on Client Payments Reported as Received In 2019 Q3*

Rank & Payments	Firm & Clients		
	<p><b>TChoi and Associates</b> <i>(continued from previous page)</i></p> <p>Englander Knabe &amp; Allen on behalf of CORE/RELATED GRAND AVE JV/LLC  Englander Knabe &amp; Allen on behalf of Devlin Land Group, LLC  Englander Knabe &amp; Allen on behalf of Foxpoint Media, LLC  Englander Knabe &amp; Allen on behalf of GSW Creative (dba Dosist)</p> <p>Englander Knabe &amp; Allen on behalf of Hi Hi Heel Productions  Englander Knabe &amp; Allen on behalf of KansasEXP-LA  Englander Knabe &amp; Allen on behalf of Kitchen United, Inc.  Englander Knabe &amp; Allen on behalf of LaTerra Properties  Englander Knabe &amp; Allen on behalf of N.N.N. Productions</p> <p>Englander Knabe &amp; Allen on behalf of Platinum Security  Englander Knabe &amp; Allen on behalf of Seaview Investors, LLC  Englander, Knabe &amp; Allen on behalf of Bergin's Irish Pub  Englander, Knabe &amp; Allen on behalf of Billie Lourd  Englander, Knabe &amp; Allen on behalf of Blue Label Construction  Englander, Knabe &amp; Allen on behalf of Cynthia Ambuehl Diamont  Englander, Knabe &amp; Allen on behalf of The Citrus Hill Trust  Next Century Partners, LLC</p>		
10. \$416,762	<p><b>Kindel Gagan</b></p> <p>755 S Los Angeles St, LLC  ABM  Alchemy Media  Amazon  American Chemistry Council  American Hotel &amp; Lodging Association  AT&amp;T INC. AND ITS AFFILIATES  Aviation Facilities Company Management  Aviation Safeguards  California Sign Association  Cedars-Sinai Medical Center  Center BMW  Chandler Partners  CJM Investments</p> <p>Corvias LLC  DLJ Real Estate Capital Partners  DWP Mgmt Employees Assn  Assn Felix Chevrolet on behalf of The Shammas Group  Firefly Systems Inc.  Gateway to LA  Greater LA New Car Dealers Assn  Honda of Downtown L.A.  Honeywell International Inc.  Hudson Group  Hudson Pacific Properties  JADE Enterprises, LLC  JMF Development Co  Keyes Automotive  Kilroy Realty Corp  LimeBike</p> <p>London &amp; Gonzalez Advocacy on behalf of the Recording Industry Assoc. of America  MadCap Motel, LLC  Manhole Adjusting Inc.  Markwood Enterprises Menzies Aviation  Morrison Hotel, LLC &amp; Morrison Residential, LLC  Oracle America, Inc.  Praxair, Inc. - Danbury, CT  Space Exploration Technologies Corp.  STV Group Inc.  Super Shuttle Los Angeles  Swedish Match North America LLC  Swissport USA, Inc.  TC LA Development, Inc  The Borman Group  Topanga Managing Partners LLC  Transdev North America, Inc.  United Airlines  World Class Capital Group LLC</p>		

## E. Top 10 Highest Paying Clients

In the third quarter of 2019, there were 2,016 registered clients of lobbying entities. Lobbying firms are required to disclose the payments they receive from their clients and the City matters associated with those payments. The clients that lobbying firms reported as having paid the most for lobbying services in the third quarter are identified in the table that begins below. Payments from clients with similar names and projects are aggregated.

Each of the top ten highest paying clients spent at least \$165,000 during the quarter. Combined, their payments totaled \$2,486,551 or 13.9 percent of the \$17,913,968 total reported payments from clients.

TOP 10 HIGHEST PAYING CLIENTS					
Based on Aggregated Client Payments Reported for 2019 Q3					
Client	Total Payments Reported	Detail of Total Payments			Agencies Lobbied
		Lobbying Firm	Payment	City Matter	
1. The Peebles Corporation	\$339,885	Sheppard, Mullin, Richter & Hampton LLP	\$339,885	Angels Landing/351 S. Hill St., Los Angeles, CA- Redevelopment of Angels Landing in DTLA by applicant, Angels Landing Partners LLC	Mayor, City Council, Building and Safety, CLA, CAO, Planning
2. LaTerra Development, LLC	\$305,116	Englander Knabe and Allen (including three6ixty)	\$67,700	12575 Venice Blvd., Los Angeles, CA 90066	No City agencies lobbied
			\$66,400	Development/4900 Hollywood Blvd.	No City agencies lobbied.
			\$63,387	Development/4850 Hollywood Blvd.	No City agencies lobbied.
			\$22,400	1350 Deluxe Hollywood Investors, LLC/1350 N. Western Ave., Los Angeles, CA	No City agencies lobbied.
			\$20,800	Pinnacle 360 Hoover LLC/235 N. Hoover Street, Los Angeles, CA	No City agencies lobbied.
			\$15,700	Development/12444, 12575, 12579 Venice Blvd., LA	No City agencies lobbied.
			\$13,400	Development / Encore Silverlake Investments/2753 Waverly Drive, Los Angeles	No City agencies lobbied.
			\$10,600	Development/1100 West Temple	No City agencies lobbied.
		Arnbruster Goldsmith & Delvac LLP	\$13,008	1350 Western/1350 Western	City Council
		\$6,513	4900 Hollywood/4900 Hollywood	City Attorney, City Council, Planning	
		\$4,508	4850 Hollywood/4850 Hollywood	City Council, Planning	
		\$350	12440 Venice/12440 Venice	No City agencies lobbied.	
		\$350	12575 Venice/12575 Venice	No City agencies lobbied	

### TOP 10 HIGHEST PAYING CLIENTS (cont'd)

*Based on Aggregated Client Payments Reported for 2019 Q3*

Client	Total Payments Reported	Detail of Total Payments			Agencies Lobbied
		Lobbying Firm	Payment	City Matter	
3. Clear Channel Outdoor, LLC (and Clear Channel Outdoor, Clear Channel Outdoor, Inc., and Clear Channel)	\$292,058	Mercury Public Affairs	\$100,000	Issue related to digital boards.	Mayor, City Council
		Afriat Consulting Group, Inc	\$49,318	Assist with securing permits and other issues regarding outdoor advertising/Various locations	City Council, Neighborhood Councils
		Kirra, LLC	\$45,000	Outdoor Advertising	Mayor, City Council, Planning
		Michael Bai	\$45,000	Billboard Issue	No City agencies lobbied.
		Urban Solutions, LLC	\$30,089	Digital Signage [CF12-1611]	City Council
		David Gershwin Consulting	\$21,000	Outdoor Advertising Issues/City of Los Angeles [FILE11-1705]	City Council, Neighborhood Councils
		Latham & Watkins LLP	\$1,651	Assist client in connection with outdoor advertising issues.	City Attorney, City Council, Planning
4. Holland Partner Group (and Holland Partners)	\$280,971	Sheppard, Mullin, Richter & Hampton LLP	\$192,221	3rd and Fairfax /6300 W. Third Street	City Council, Planning, LADOT
		Loeb & Loeb LLP	\$46,087	1911 Sunset	City Council, Planning
		Urban Solutions, LLC	\$25,226	Taix/1911 Sunset Blvd. Proposed multi-family residential project	City Council
		Eric Shabsis Public Affairs	\$15,036	Town & Country/Third & Fairfax	No City agencies lobbied.
		Craig Lawson & Co., LLC	\$1,955	Mixed Use Project /9th & Figueroa [DIR 2015-97-SPR]	Building and Safety, Planning
			\$446	Mixed Use Project/Fairfax & 3rd, Los Angeles	Planning
5. Crossroads Associates LLC	\$259,516	DLA PIPER LLP (US)	\$259,516	Crossroads. Development of a 7 plus acre site with 8 new buildings including hotel, retail, residential and office uses.(CPC-2015-2025-ZC-HD-MCUP-CU-ZV-SPR)	City Attorney, City Council, Building and Safety, HCID, Neighborhood Councils, Planning
6. Champion Real Estate Company	\$234,500	DLA PIPER LLP (US)	\$126,886	General Real Estate	City Council, Building and Safety, HCID Planning
			\$100,369	Yucca Argyle	City Council, Building and Safety, HCID, Planning
		Elkins Kalt Weintraub Reuben Gartside LLP	\$7,245	Development matters	City Council

**TOP 10 HIGHEST PAYING CLIENTS (cont'd)**

*Based on Aggregated Client Payments Reported for 2019 Q3*

Client	Total Payments Reported	Detail of Total Payments			Agencies Lobbied
		Lobbying Firm	Payment	City Matter	
7. AEG	\$218,898	Armbruster Goldsmith & Delvac LLP	\$127,249	Convention Center Expansion & Hotel/Convention Center Expansion & Hotel	City Attorney, Cultural Affairs, Planning
			\$41,649	LA Live entitlements/LA Live Entitlements	City Attorney, Planning
		M Advisors LLC	\$25,000	Continued development and operations of LA LIVE	Mayor, City Attorney, City Council, Building and Safety, CAO, Convention and Tourism Development, LAFD, Planning, LAPD, Public Works Board, Rec & Parks
			\$25,000	Special event approvals, downtown hotel development, and waste and recycling issues.	Mayor, City Attorney, City Council, Building and Safety, CAO, Convention and Tourism Development, LAFD, Planning, LAPD, Public Works Board, Rec & Parks
8. Englander Knabe & Allen on behalf of LaTerra Properties	\$207,978	TChoi and Associates	\$51,264	12575 Venice	City Council,
			\$50,898	4900 Hollywood Blvd.	City Council
			\$47,313	4850 Hollywood Blvd.	City Council
			\$16,940	1350 N. Western	City Council
			\$15,884	235 N. Hoover	City Council
			\$10,079	2753 Waverly	Building and Safety
			\$7,950	1100 W. Temple	City Council
			\$7,650	1244 Venice	City Council
9. LAFC Sports, LLC	\$182,505	Latham & Watkins LLP	\$157,505	General Land Use and Transportation Matters Related to Major League Soccer & Sports Arena/University Park	Building and Safety, Planning
		M Strategic Communications	\$25,000	Stadium project at Expo Park	Mayor, City Council, Planning
10. SOCAL San Pedro SPV1, LLC	\$165,124	Psomas	\$165,124	Support for processing of a Final Map/26900 & 27812 S. Western Ave., San Pedro, CA	Planning, Engineering

**F. Fundraising**

Lobbying entities are required to disclose the fundraising they engage in on behalf of elected City officials, candidates, and committees. Of the 720 third-quarter lobbying entities, 16 (2.2 percent) reported fundraising activity totaling \$160,900.

A breakdown of the third-quarter fundraising activity, as reported by seven lobbyists and nine lobbying firms is provided in the following table. Entities that reported identical amounts for the same candidate or officeholder may have served as co-hosts for the same fundraising event.

FUNDRAISING 2019 Q3			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
1. \$25,000	Edgar Khalatian	Lobbyist	<i>Kevin de Leon for City Council 2020</i> ..... \$25,000
2. \$25,000	Mayer Brown LLP	Firm	<i>Kevin de Leon for City Council 2020</i> ..... \$25,000
3. \$25,000	Philip R. Recht	Lobbyist	<i>Kevin de Leon for City Council 2020</i> ..... \$25,000
4. \$18,500	Englander Knabe and Allen (including three6ixty)	Firm	<i>John Lee for City Council 2019-Runoff</i> ..... \$7,300 <i>John Lee for City Council 2020-Primary</i> ..... \$3,200 <i>Kevin de Leon for City Council 2020</i> ..... \$3,200 <i>Mark Ridley-Thomas for City Council 2020</i> ..... \$3,200 <i>Joe Buscaino for City Council, 2011, Officeholder</i> ..... \$1,600
5. \$17,150	Veronica Perez & Associates	Firm	<i>Kevin de Leon for City Council 2020</i> ..... \$14,750 <i>Councilmember Curren Price Officeholder Account</i> ..... \$2,400
6. \$10,750	Kindel Gagan	Firm	<i>Kevin de Leon for City Council 2020</i> ..... \$10,750
7. \$8,200	Cerrell Assoc Inc	Firm	<i>John Lee for City Council 2019-Runoff</i> ..... \$8,200
8. \$7,700	Jeffrey S. McConnell	Lobbyist	<i>Joe Buscaino for City Council, 2011, Officeholder</i> ..... \$1,600 <i>John Lee for City Council 2020-Primary</i> ..... \$1,600 <i>Kevin de Leon for City Council 2020</i> ..... \$1,600 <i>Mark Ridley-Thomas for City Council 2020</i> ..... \$1,600 <i>John Lee for City Council 2019-Runoff</i> ..... \$1,300
9. \$7,100	Afriat Consulting Group Inc	Firm	<i>Kevin de Leon for City Council 2020</i> ..... \$2,900 <i>Councilmember O'Farrell Officeholder Account 2013</i> ..... \$2,400 <i>Paul Krekorian for City Council 2020</i> ..... \$1,300 <i>Councilmember Curren Price Officeholder Account</i> ..... \$250 <i>Loraine Lundquist for City Council 2019-Runoff</i> ..... \$250
10. \$6,000	Eric W. Rose	Lobbyist	<i>John Lee for City Council 2019-Runoff</i> ..... \$5,200 <i>John Lee for City Council 2020-Primary</i> ..... \$800
11. \$4,000	Marcus A. Allen	Lobbyist	<i>Mark Ridley-Thomas for City Council 2020</i> ..... \$1,600 <i>John Lee for City Council 2020-Primary</i> ..... \$800 <i>John Lee for City Council 2019-Runoff</i> ..... \$800 <i>Kevin de Leon for City Council 2020</i> ..... \$800
12. \$2,100	The McOsker Group	Firm	<i>John Lee for City Council 2020-Primary</i> ..... \$2,100
13. \$2,000	TChoi and Associates	Firm*	<i>Friends of Eric Garcetti Officeholder</i> ..... \$2,000
14. \$800	Alex H. Cherin	Lobbyist	<i>Kevin de Leon for City Council 2020</i> ..... \$800

FUNDRAISING 2019 Q3 (cont'd)			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
15. \$800	colLABorate	Firm	David Ryu for City Council 2020.....\$800
16. \$800	Kate Hennigan	Lobbyist	David Ryu for City Council 2020.....\$800

\*Sole proprietor

## G. Contributions

Lobbying entities must report on a quarterly basis the contributions they make or deliver or for which they act as intermediaries.

A lobbying entity delivers a contribution for another person when the lobbying entity causes the contribution to be mailed or physically conveyed to the recipient. A lobbying entity is an intermediary for a contribution when the lobbying entity makes the contribution, itself, on behalf of another party who then reimburses the lobbying entity. The identity of a person for whom a lobbying entity acts as an intermediary must be disclosed.

Certain contributions are prohibited. Lobbyists and lobbying firms may not make contributions to elected City officials, candidates, or their City-controlled committees if they are required to be registered to lobby the City office the official or candidate holds or seeks. This ban does not extend to lobbyist employers.

In the third quarter, three lobbyist employers and a sole proprietor lobbyist reported making a combined \$11,400 in contributions, detailed in the next table.

MADE CONTRIBUTIONS 2019 Q3			
Total Made	Name of Lobbying Entity	Type of Entity	Recipients
1. \$5,800	BNSF Railway Company	Employer	Joe Buscaino for a Better LA..... \$5,000 Joe Buscaino for City Council, 2011, Officeholder..... \$800
2. \$4,300	UNITE HERE Local 11	Employer	Wesson for Supervisor 2020..... \$1,500 Jackie Goldberg for School Board 2020..... \$1,200 Kevin de Leon for City Council 2020..... \$800 Loraine Lundquist for City Council 2019-Runoff.... \$800
3. \$800	Laborers Local 300	Employer	Krekorian for City Council 2009 - Officeholder ..... \$800
4. \$500	ASM Premier Consultants, LLC	Firm*	Wesson for Supervisor 2020..... \$500

\*Sole proprietor

Also during the reporting period, seven lobbyists, six lobbying firms, and three lobbyist employers reported delivering \$64,000 in contributions to the committees of nine City officeholders and three City Council candidates. More detail is provided in the table on the next two pages.

**DELIVERED CONTRIBUTIONS 2019 Q3**

<b>Total Delivered</b>	<b>Name of Lobbying Entity</b>	<b>Type of Entity</b>	<b>Recipients</b>
1. \$16,000	Kindel Gagan	Firm	<i>Kevin de Leon for City Council 2020..... \$6,750</i> <i>John Lee for City Council 2019-Primary..... \$4,000</i> <i>Friends of Eric Garcetti Officeholder ..... \$1,000</i> <i>Councilmember Curren Price Officeholder</i> <i>Account ..... \$800</i> <i>Councilmember O'Farrell Officeholder</i> <i>Account 2013 ..... \$800</i> <i>Nury Martinez for City Council 2020..... \$800</i> <i>John Lee for City Council 2019..... \$800</i> <i>John Lee for City Council 2019-Runoff ..... \$800</i> <i>Controller Ron Galperin Officeholder</i> <i>Account 2013..... \$250</i>
2. \$13,300	Arnie Berghoff \$ Associates	Firm	<i>Friends of Eric Garcetti Officeholder ..... \$4,500</i> <i>Councilmember Cedillo Officeholder</i> <i>Account 2013 ..... \$4,000</i> <i>Councilmember Curren Price Officeholder</i> <i>Account ..... \$1,600</i> <i>Joe Buscaino for City Council, 2011,</i> <i>Officeholder..... \$1,600</i> <i>John Lee for City Council 2019-Runoff ..... \$1,600</i>
3. \$9,300	Englander Knabe and Allen (including three6ixty)	Firm	<i>John Lee for City Council 2020-Primary..... \$3,200</i> <i>Kevin de Leon for City Council 2020..... \$3,200</i> <i>John Lee for City Council 2019-Runoff ..... \$2,900</i>
4. \$4,700	Afriat Consulting Group Inc	Firm	<i>Councilmember O'Farrell Officeholder</i> <i>Account 2013 ..... \$2,400</i> <i>Kevin de Leon for City Council 2020..... \$1,800</i> <i>Councilmember Curren Price Officeholder</i> <i>Account ..... \$250</i> <i>Loraine Lundquist for City Council 2019-Runoff.... \$250</i>
5. \$4,500	Jeffrey S. McConnell	Lobbyist	<i>John Lee for City Council 2020-Primary..... \$1,600</i> <i>Kevin de Leon for City Council 2020..... \$1,600</i> <i>John Lee for City Council 2019-Runoff ..... \$1,300</i>
6. \$2,400	Marcus A. Allen	Lobbyist	<i>John Lee for City Council 2020-Primary..... \$800</i> <i>John Lee for City Council 2019-Runoff ..... \$800</i> <i>Kevin de Leon for City Council 2020..... \$800</i>
7. \$2,400	Beverly Kenworthy	Lobbyist	<i>Bob Blumenfield for City Council 2013 –</i> <i>Officeholder Account..... \$800</i> <i>Councilmember Cedillo Officeholder</i> <i>Account 2013 ..... \$800</i> <i>Mark Ridley-Thomas for City Council 2020..... \$800</i>
8. \$1,900	Central City Association of Los Angeles	Employer	<i>Joe Buscaino for City Council, 2011,</i> <i>Officeholder..... \$800</i> <i>John Lee for City Council 2019-Runoff ..... \$800</i> <i>Mark Ridley-Thomas for City Council 2020..... \$300</i>

DELIVERED CONTRIBUTIONS 2019 Q3 (cont'd)				
Total Delivered	Name of Lobbying Entity	Type of Entity	Recipients	
9. \$1,600	Ken Spiker And Assoc Inc	Firm	<i>John Lee for City Council 2019-Runoff</i> ..... \$1,600	
10. \$1,600	Gregory Spiker	Lobbyist	<i>John Lee for City Council 2019-Runoff</i> ..... \$1,600	
11. \$1,600	Eric W. Rose	Lobbyist	<i>John Lee for City Council 2019-Runoff</i> ..... \$800 <i>John Lee for City Council 2020-Primary</i> ..... \$800	
12. \$1,500	Airbnb	Employer	<i>Friends of Eric Garcetti Officeholder</i> ..... \$1,500	
13. \$800	Building Industry Association - Los Angeles/Ventura Chapter	Employer	<i>John Lee for City Council 2019-Runoff</i> ..... \$800	
14. \$800	Alex H. Chernin	Lobbyist	<i>Kevin de Leon for City Council 2020</i> ..... \$800	
15. \$800	Morrie Goldman	Lobbyist	<i>Nury Martinez for City Council 2020</i> ..... \$800	
16. \$800	Urban Solutions LLC	Firm	<i>Nury Martinez for City Council 2020</i> ..... \$800	

## H. Activity Expenses

Lobbying entities are required to report the payments they make to benefit City officials and their immediate family members. LAMC §§ 48.08(B)(4)–(5), 48.08(C)(5)–(6), 48.08(D)(7)–(8). Activity expenses include gifts and must be itemized if they are valued at \$25 or more. *Id.*; LAMC § 48.02.

Just as lobbyists and lobbying firms cannot make certain campaign contributions, they also cannot make gifts to City officials. Gifts from lobbyist employers are not prohibited, but they may not exceed \$100 per City official per year. As noted in the following table, three lobbyist employers reported itemized activity expenses totaling \$229 in the third quarter of 2019.

ACTIVITY EXPENSES 2019 Q3					
Total	Lobbying Entity	Type of Entity	Recipient	Description	Value
1. \$149	University of Southern California	Employer	Jasson Crockett <i>Manager of Economic Policy</i> Office of the Mayor	Inaugural Dinner	\$100
			Lawrence Vasquez <i>Director, Military and Veterans Affairs</i> Office of the Mayor	Attended Coliseum Ribbon Cutting Reception	\$49

ACTIVITY EXPENSES 2019 Q3 (cont'd)					
Total	Lobbying Entity	Type of Entity	Recipient	Description	Value
2. \$40	Nuveen Services, LLC	Employer	Jeremy Wolfson <i>Chief Investment Officer</i> LADWP	Dinner	\$40
3. \$40	So Cal Gas Co (a Sempra Energy Utility)	Employer	Albert Lord III <i>Council Deputy</i> Council District 10	Meal (Harold and Belle's)	\$40

## I. Major Filers

A major filer is a person who makes or incurs expenses totaling \$5,000 or more in a calendar quarter to influence one or more City matters but does not directly communicate with a City decision maker. Lobbyists, lobbying firms, and lobbyist employers are not major filers, and the payments and expenses they report do not count toward the threshold. However, a lobbying client can qualify as a major filer. LAMC § 48.02.

Major filers must file a disclosure report for every quarter in which they meet the \$5,000 threshold. Among other things, they must report the money spent on public or media relations, advertising, public outreach, research, reports, and similar activities. LAMC § 48.08(E).

For the third quarter of 2019, four entities reported \$172,503 in major filer activity.

Major Filer Activity 2019 Q3			
Filer	City Matter	City Reference Number	Total Expenditures
Californians for Energy Independence	Petroleum Administrator's recommended setback requirements	none given	\$60,271
Ad Zero	Sign Ordinance Revisions	CF 11-1705	\$53,366
Expedia Group	Vacation rentals in non-primary homes/ordinances	CF 18-1246	\$42,141
Altria Client Services	Flavored Tobacco Products Sale Restriction	CF-18-1104	\$16,725

## J. Public Access

This and other quarterly summaries are available on the Ethics Commission's web site. Detailed information about lobbying entities and their clients is also available. Registration statements and quarterly reports may be viewed online, and specific information may be searched through the Public Data Portal.