
Item 6

Action

Campaign Contributions and Behested Payments

Executive Summary: This item recommends options for regulating campaign contributions and fundraising by non-individuals and developers, as well as behested payments.

Recommended Action: Determine whether to approve options for regulating campaign contributions, fundraising, and behested payments.

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Campaign Contributions and Behested Payments

A. Introduction

City law limits the amount of money that a single person may give to a single candidate for elected City office. Currently, a campaign contribution may not exceed \$800 per person per election for City Council candidates or \$1,500 per person per election for Citywide candidates. In April 2018, the Ethics Commission began an analysis of whether campaign contributions from developers should be banned.

This report continues that discussion and identifies options on pages 4 and 7. This report also revisits a previous discussion regarding behested payments and identifies options on pages 10 and 11.

B. Process

This review represents many hours of discussion across several disciplines within the agency. Over the past ten months, the staff has analyzed data, assessed public input, and examined laws in other jurisdictions. An Ethics Commission subcommittee was formed to look at the issue, and several meetings with subcommittee members and high-level staff in the Department of City Planning (the Planning Department) have been held.

Public input has been solicited throughout this review. Most recently, it was solicited through website postings and an email solicitation sent on January 18, 2019. Multiple interested parties have requested teleconferences and meetings, and staff and commissioners met with everyone who made a request.

C. Contributions and Fundraising

1. Background

To reduce the actual or perceived influence of well-funded special interests, City law limits the amount of money that a person may give to a candidate in a City election. Los Angeles City Charter (Charter) §§ 470(c)(3)–(4). In addition, to reduce actual or perceived corruption or pay-to-play politics, several types of contributions are currently prohibited.

One ban applies to any contribution made under an assumed name (a name other than the true source of the contribution). Charter § 470(k). This is generally referred to as political money laundering. Another ban exists in federal law and applies to contributions from foreign nationals and foreign entities. 52 USC § 30121; 11 CFR § 110.20.

The City also bans contributions based on two types of activity: lobbying and contracting. Lobbyists and lobbying firms are prohibited from making contributions to a candidate who holds or seeks a City office that the lobbyist or lobbying firm is (or is required to be) registered to lobby. Charter § 470(c)(11). Similarly, candidates are prohibited from accepting a contribution from a lobbyist or lobbying firm that is (or is required to be) registered to lobby a City office that the candidate holds or seeks. *Id.* The ban does not extend to committees that City officeholders or candidates control in other jurisdictions.

Finally, bidders and contractors are prohibited from making contributions to and engaging in prohibited fundraising (fundraising from among their employees, officers, and principals) for a candidate who holds or seeks an office that must approve the contract, if the contract is valued at \$100,000 or more. Charter § 470(c)(12); LAMC §§ 49.7.35–36. This ban extends to the bidder or contractor’s principals, subcontractors of \$100,000 or more, and the principals of those subcontractors. *Id.* However, like the ban on contributions from lobbying entities, this ban does not extend to committees that City officeholders or candidates control in other jurisdictions.

Councilmember Ryu has introduced two motions that would add contributions from developers to the list of banned contributions. Initially, in January 2017, he asked the Ethics Commission to prepare an ordinance that would prohibit contributions from developers on discretionary development projects and their principals. He recommended defining “developer” broadly, possibly including contractors and subcontractors. *See* Attachment A, Council File No. 17-0042. In January 2019, while the Ethics Commission continued to assess the complexities of the issue, he asked the City Attorney to prepare an ordinance to prohibit contributions from “restricted developers” (property owners and their principals) on projects that require approval by an elected official or a candidate for elected office and involve more than 4,000 square feet of residential space or 15,000 square feet of commercial space. *See* Attachment B, Council File No. 19-0046.

For both motions, Councilmember Ryu submitted an ordinance, which proposes regulating development projects that are governed by the Planning Department, based on the square footage of the project and the specific type of use. *See* Attachment C, Kaufman Legal Group Memorandum, 5/24/2018. For a variety of reasons that are discussed below, we do not recommend adoption of that particular ordinance.

The Ethics Commission has been analyzing the legal and logistical considerations associated with a developer ban for the past ten months. The goal of the analysis has been to ensure that any ban would reflect a full understanding of how the planning process works and would reduce the likelihood of loopholes. In addition, given the limited amount that a single person may contribute to a City officeholder or candidate, the Ethics Commission believes it is important to consider issues not included in the motions, such as fundraising and bundling by developers, as well as the receipt of contributions by committees controlled by City officials and candidates in both the City and other jurisdictions.

2. Considerations

Concern that developers exert undue influence undoubtedly exists, as evidenced in recent media reports focused on City Hall and extensive public comment received by the Ethics Commission. *See* Attachment J. There is no question that the widespread perception is that there is a pay-to-play culture at Los Angeles City Hall, in which developers give money to elected officials and their favorite organizations in an attempt to influence decisions about development projects and public policy. *See, e.g.*, “L.A. City Hall’s real rat problem: Corruption”, 2/9/2019, [latimes.com/local/california/la-me-lopez-cityhall-corruption-20190209-story.html](https://www.latimes.com/local/california/la-me-lopez-cityhall-corruption-20190209-story.html); “Downtown L.A. developer donated \$50,000 before pivotal vote involving high-rise project, records show”, 2/7/2019, [latimes.com/local/lanow/la-me-developer-donations-onni-20190207-story.html](https://www.latimes.com/local/lanow/la-me-developer-donations-onni-20190207-story.html); “FBI probe of Jose Huizar looking closely at Downtown development”, 1/14/2019, [la.curbed.com/2019/1/14/18182352/jose-huizar-fbi-investigation-development](https://www.1a.curbed.com/2019/1/14/18182352/jose-huizar-fbi-investigation-development); “L.A. developer is charged with making illegal campaign donations”, 2/23/2018, [latimes.com/local/lanow/la-me-ln-sea-breeze-developer-20180223-story.html](https://www.latimes.com/local/lanow/la-me-ln-sea-breeze-developer-20180223-story.html); “A \$72-million apartment project. Top politicians. Unlikely donors”, 10/30/2016, [latimes.com/projects/la-me-seabreeze/](https://www.latimes.com/projects/la-me-seabreeze/). These media reports and the allegations they contain, whatever the ultimate result, significantly erode public confidence in City government.

Actual corruption and widespread ethics violations are also associated with developers. Over the past decade, 33 Ethics Commission enforcement orders have involved developers or development projects and resulted in more than \$1 million in administrative penalties. These numbers represent approximately one-third of all respondents and just over half of all penalties during that time period. In addition, the District Attorney has charged two developers with felony counts of campaign money laundering and bribery. *See* [da.lacounty.gov/media/news/pair-charged-campaign-money-laundering-offering-bribes-la-elected-officials](https://www.da.lacounty.gov/media/news/pair-charged-campaign-money-laundering-offering-bribes-la-elected-officials), 2/23/2018.

Prohibiting contributions from persons seeking a particular result in a City decision supports the vitally important government interests in reducing both actual and perceived corruption and in restoring public trust in government institutions. However, it is also important to understand how such a ban actually could and would work within the City framework. The Ethics Commission alerted the Planning Department to the motions in Attachments A and B, and members of the subcommittee and the staff met with individuals from the Planning Department and its City Attorney to discuss a ban on developer contributions and the language proposed by Councilmember Ryu. A number of issues were raised during those discussions.

The land use entitlement process is “the process an individual goes through when they plan to develop or use their property.” *See* “Land Use Permit Process” at planning.lacity.org. A person who wants to develop a property must first go to the Department of Building and Safety (DBS), which will determine whether the project conforms with all zoning regulations. If it does conform, DBS issues a building permit and no public hearing or further discretionary approvals are required. This is referred to as “by right development”. *Id.*

If the project does not conform to all zoning regulations or otherwise requires approval by the Planning Department, the person must file an application for a land use entitlement with the Planning Department. Most land use entitlements require a public hearing and a

discretionary decision. *Id.* A sample application for an entitlement that requires a discretionary decision is provided in Attachment D. A sample application for a purely administrative entitlement (no discretionary decision required) is provided in Attachment E.

Rather than focusing on the size of a development project or including a lengthy list of property uses that are subject to change (and, in fact, are currently undergoing comprehensive changes), a ban on contributions from developers should focus on the land use entitlements that require a discretionary decision. This would tailor the ban to City decisions that are not “by right” and are, therefore, susceptible to influence. Planning Department staff explained that there are four main types of discretionary decisions for land use entitlements: director decisions; quasi-judicial decisions (made by zoning administrators); advisory agency decisions (made by the director); and decisions by the City Planning Commission and the seven area planning commissions that may proceed to the City Council and Mayor (including legislative decisions). In 2018, approximately 7,030 applications were filed with the Planning Department (an average of 586 per month). Of those, 4,075 (58 percent) required discretionary decisions and 2,955 (42 percent) were purely administrative.

Planning Department staff noted that there is no standardization regarding who applies for a land use entitlement. An applicant may be the developer, but it may also be the property owner, a law firm, a lobbying firm, an architect, an engineering firm, an attorney, or another member of the project team. As a result, a ban on contributions only from a person who has filed an application would be too narrow. In other words, it could result in a scenario in which the ban does not apply to a person whose financial interests are fundamentally affected by a planning decision.

Property ownership can also be complex. The developer may or may not be the property owner. Developers can, for example, secure from the property owner an option to pursue an entitlement to develop the property. Furthermore, approved entitlements run with the land—not with the owner or applicant. Entitled property can be transferred to new ownership after an entitlement decision has been made, and the Planning Department is not notified when that occurs. As a result, banning contributions only from property owners would also be too narrow to appropriately prevent actual or perceived corruption.

There are caveats related to banning contributions from developers. One is that, while a ban that begins with the submission of an application for a land use entitlement clearly delineates a point of entry into the planning process, it could also create public perception issues. For example, it is possible for a very large development project to receive a “by right” building permit from DBS. In that case, the developer would not be banned from making contributions, because the project did not require a discretionary City decision. However, the public would be aware of the project, simply from observing construction activity at the project site or reading about it in the news. That awareness could lead the public to believe that the developer should not be making contributions when, in fact, contributions would be legally permitted.

Timing is also an issue. It can take multiple years for a land use entitlement to go from application to decision. For projects that require an environmental impact report (1,828 environmental applications were filed in 2018), the California Environmental Quality Act

process, alone, typically takes at least one year. In addition, an approved development project may take years to complete and require discretionary approvals along the way. Therefore, a ban that extends beyond the project's completion date more fully addresses the time period during which influence can be exerted.

3. Options

In light of the logistical considerations above and the review of laws in other jurisdictions, the staff and the subcommittee members present two different options. The preferred option is a ban on contributions from non-individuals (entities such as LLCs and corporations) and from individual (human) developers.

a. *Ban Non-individuals and Developers (Individuals)*

A number of local jurisdictions have approached the corruption issue by banning contributions from non-individuals, meaning businesses and other entities. This is sometimes referred to as a “people only” or “humans only” model. For example, San Diego prohibits contributions from all non-individuals except political parties. *See* San Diego Municipal Code § 27.2950. San Francisco prohibits contributions from corporations (as do approximately 20 states, according to the National Conference of State Legislators). *See* San Francisco Campaign and Governmental Conduct Code § 1.114(b); “State Limits on Contributions to Candidates, 2017-2018 Election Cycle”, 6/27/2017, ncsf.org. New York City also bans contributions from corporations and other business entities. *See* New York City Campaign Finance Board Rule 1-04(e), Campaign Finance Act § 3-703(l).

San Diego's non-individual ban was upheld by the 9th Circuit Court of Appeals in *Thalheimer v. City of San Diego*, 645 F.3d 1109 (9th Cir. 2011). The court found that a ban on contributions from non-individuals is constitutional if it is closely drawn to match a sufficiently important government interest. Preventing corruption, the appearance of corruption, or circumvention of the law are valid government interests that justify campaign finance restrictions. *Thalheimer*, 645 F.3d at 1118. The 9th Circuit held that San Diego's ban constitutionally supports the prevention of corruption but did carve out an exception for contributions from political parties, finding that a ban on such contributions threatens the First Amendment right to associate in a political party. *Thalheimer*, 645 F.3d at 1128.

A non-individual ban provides more clarity about who may contribute and who may not. It eliminates the need to aggregate (combine) the contributions of multiple persons and treat them as if they were made by a single person. This is currently required by law when one person exerts a certain level of control over another's contribution activity. *See* Los Angeles Municipal Code (LAMC) § 49.7.4. For example, a contribution from an LLC and a contribution from an individual who owns more than 50 percent of the LLC must be aggregated to protect and prevent the circumvention of the per-person contribution limits. When aggregation is no longer an issue, it is much easier for candidates and their committees to comply with the contribution limits during a campaign, and the audits that follow an election are much more straightforward. It is also easier for contributors to comply with the law, because it eliminates potential confusion about whose contributions must be aggregated with theirs.

In addition to simplifying the fundraising and audit processes, a non-individual ban significantly enhances transparency about who is funding City campaigns. When all contributions must be attributed to an individual, it eliminates the murkiness that occurs when a business or a trust, for example, makes a contribution and there is no data about the individuals who control it.

City law currently limits contributions from non-individuals. The Charter states that candidates may not “accept more than” certain total dollar amounts from non-individuals. The maximums vary depending on the type of candidate, apply per election, and are adjusted annually to reflect changes in the Consumer Price Index (CPI). Charter § 470(c)(7); LAMC § 49.7.3(B)(2)(c). The current maximums are \$226,500 for City Council candidates, \$603,800 for City Attorney and Controller candidates, and \$1,358,700 for Mayoral candidates. However, this limit does not address the potential for corruption that exists when businesses and other entities make political contributions that must be aggregated (combined) with contributions made by individuals who control those businesses and entities.

In all of the audits conducted for City elections from 2011 through 2015, there were a total of 515 audit findings. Excess contributions accounted for 81 percent of those findings, and 213 of the excess contributions involved non-individuals. If non-individuals had been prohibited from contributing during that time period, audit findings would have been reduced by approximately 42 percent overall, and findings related to excess contributions would have been reduced by over 51 percent.

Also of note is the fact that the percentage of contributions from non-individuals has decreased in City elections since 2011. This may be the result of the matching funds program, which only recognizes contributions from individuals. As shown in the table below, contributions from non-individuals represent 20 percent or less of all contributions to City candidates in the past three elections, including the highly competitive 2013 elections. Therefore, a ban on non-individual contributions would not prohibit most contributions that are currently collected. It would, however, provide greater transparency for the public about who is behind approximately one-fifth of typical contributions.

INDIVIDUAL v. NON-INDIVIDUAL CONTRIBUTIONS				
City Election	INDIVIDUAL		NON-INDIVIDUAL	
	Total Amount	Percent of Total Contributions	Total Amount	Percent of Total Contributions
2011	\$2,872,485	71%	\$1,150,707	29%
2013	\$25,780,389	81%	\$6,179,072	19%
2015	\$4,442,492	81%	\$1,011,714	19%
2017	\$8,696,301	80%	\$2,186,504	20%

Reflects itemized contributions as reported. Numbers are rounded.

In light of the data and to prevent both actual or apparent corruption and the circumvention of the contribution limits, we believe it is important to amend City law to prohibit contributions from non-individuals and individual developers. We also believe it is critical to restrict fundraising and bundling, which can result in far more money for candidates and officeholders than a single contribution of \$800 or \$1,500.

Recommended language to implement a non-individual ban is provided in Attachment F. Key provisions include the following.

- (1) Like the existing ban on lobbying contributions, the recommended ban applies to **both the making and the receiving** of a contribution. We believe this is an essential component of an equitable and effective anti-corruption law. *See* proposed LAMC § 49.7.37(A); Attachment F, p. 3.
- (2) The recommended ban applies in addition to the existing prohibitions on contributions from **individuals** who are lobbyists, bidders, contractors, principals, and subcontractors. *See* proposed LAMC §§ 49.7.37(B); Attachment F, pp. 3-4. *See also* Charter §§ 470(c)(11)–(12); LAMC §§ 49.7.35–49.7.36. The ban also extends to individuals who are applicants and principals in land use permit processes that require discretionary decisions, under the same parameters described in Subsection 3(b), below. *See* proposed LAMC § 49.7.37(B)(1)(c); Attachment F, p. 3. In addition, the prohibition against both making and receiving contributions is applied universally to all banned individuals. *See* proposed LAMC § 49.7.37(B); Attachment F, pp. 3-4.
- (3) Similar to the existing ban on fundraising by bidders, contractors, subcontractors, and their principals, the recommended ban extends to **fundraising and bundling**, as well as to personal contributions. We believe this is also a critical component of an anti-corruption law, in that it would eliminate a significant loophole by prohibiting a banned person from collecting large amounts of other people’s money and delivering that money to an elected official or candidate in an attempt to influence the official or candidate. This is acknowledged in the ban on prohibited fundraising that currently exists for bidders, contractors, subcontractors, and their principals in Charter § 470(c)(12) and LAMC §§ 49.7.35, 49.7.36. A person subject to the ban would continue to be able to engage in the vast majority of political activities, such as endorsing a candidate, volunteering with a candidate’s campaign, expressing views through independent expenditures, giving speeches, soliciting votes, and writing opinion pieces. We further recommend that the different references to “prohibited fundraising” in the Campaign Finance Ordinance (CFO) be consistent. The recommended language universally applies a definition that already exists. *See* proposed LAMC §§ 49.7.35(A)(7), 49.7.36(A)(1), 49.7.37(A)–(B), 49.7.37(C)(1), (3); Attachment F, pp. 1-4.
- (4) The recommended ban applies to contributions to and fundraising for **any committee controlled by an elected City official or a candidate** for elected City office. *See* proposed LAMC §§ 49.7.37(A)–(B); Attachment F, pp. 3-4. This would include, for example, committees controlled for purposes of running for office or supporting or opposing a ballot measure in other jurisdictions. We believe this is critical to an effective anti-corruption law, because influence can be improperly garnered by giving to any committee controlled by an elected official or candidate, regardless of jurisdiction.

- (5) As with the current ban on contributions and fundraising by bidders, contractors, subcontractors, and their principals, the recommended ban includes a **disclosure** requirement for land use entitlement processes. This helps identify and inform the members of the project team of their legal obligations, provides more robust information to the public about development in the City, and supports proper enforcement. The recommendation includes a funding provision, similar to the one for the contractor filing system in LAMC § 49.5.11(B)(7). *See* proposed LAMC § 49.7.38; Attachment F, pp. 4-5.
- (6) The recommended ban includes a modification to the mandatory **contributor certification**. Contributors are currently required to certify that they are not prohibited from making a contribution by virtue of being a lobbying entity or a bidder or contractor, and we believe they should also be required to certify that they are not prohibited from making a contribution by virtue of being a non-individual or an applicant or principal for a land use entitlement. *See* proposed LAMC § 49.7.16(B)(3)(c); Attachment F, p. 1.
- (7) The recommended ban would require renumbering the last four sections of the CFO. *See* proposed LAMC §§ 49.7.39–42; Attachment F, pp. 4-5.

If the recommended ban is approved, companion amendments to the Charter and the CFO may be necessary, to update existing laws regarding non-individual contributions and aggregation.

b. Ban Developers (Individual and Non-individual)

If a ban on contributions from and fundraising by non-individuals and individual developers is not approved, we recommend a ban on contributions from and fundraising by both individual and non-individual developers. Language to implement such a ban is provided in Attachment G, and key provisions include the following.

- (1) To combat actual and perceived corruption, we believe that it is essential for a contribution ban to apply to **both the making and the receiving** of the contribution. *See* proposed LAMC § 49.7.37(B); Attachment G, p. 4. This mirrors the existing ban on lobbyist contributions but was not addressed in the motions in Attachments A and B.
- (2) The ban applies to **applicants and their principals**. An applicant is the person who submits an application for a land use entitlement. The principals include the property owners, any person substantially involved in the permit process or the development project (*e.g.*, architect, lobbyist, engineer, consultant, subcontractor of \$100,000 or more, attorney, etc.), key officers of the applicant and principals, and any individual who owns 20 percent or more of the applicant or a principal. This mirrors the existing ban on bidders, contractors, subcontractors, and their principals but was not addressed in the motions in Attachments A and B. *See* proposed LAMC §§ 49.7.37(A)(3), (6), 49.7.37(B); Attachment G, pp. 3-4.

- (3) To focus on circumstances in which actual or perceived corruption may exist, the ban applies to **any land use entitlement process** with the Planning Department, other than those that are purely administrative. This more accurately reflects the City's actual planning processes and tailors the ban to focus on discretionary decisions that may be swayed by improper influence. However, it does mean that persons involved in any non-discretionary development authority granted by DBS or the Planning Department would not be banned. *See* proposed LAMC § 49.7.37(A)(2); Attachment G, p. 3.
- (4) The ban applies to **fundraising and bundling**, as well as to contributions. We believe this is a critical component of an anti-corruption law, in that it would prohibit a banned person from collecting large amounts of other people's money and delivering that money to an elected official or candidate in an attempt to influence the official or candidate. This is acknowledged in the ban on prohibited fundraising that currently exists for bidders, contractors, subcontractors, and their principals in Charter § 470(c)(12) and LAMC §§ 49.7.35, 49.7.36. A person subject to the ban would continue to be able to engage in the vast majority of political activities, such as endorsing a candidate, volunteering with a candidate's campaign, expressing views through independent expenditures, giving speeches, soliciting votes, and writing opinion pieces. To more fully protect against an environment of corruption and establish consistency in how fundraising is treated throughout the campaign finance laws, we believe that the same fundraising ban should also be extended to lobbyists, lobbying firms, bidders, and contractors. The language that is recommended universally applies a definition that already exists in the CFO. Fundraising and bundling were not addressed in the motions in Attachments A and B. *See* proposed LAMC §§ 49.7.35(A)(7), 49.7.36(A)(1), 49.7.37(A)(4), (A)(7), (B); Attachment G, pp. 1-4.
- (5) The ban applies to contributions to and fundraising for **any committee controlled by an elected City official or a candidate** for elected City office. *See* proposed LAMC §§ 49.7.37(B); Attachment G, p. 4. This includes committees controlled for purposes of running for office or supporting or opposing a ballot measure in other jurisdictions. This is an essential component of an anti-corruption law, because influence can be improperly garnered by giving to a committee controlled by an elected City official or candidate, regardless of jurisdiction. This was not addressed in the motions in Attachments A and B.
- (6) The ban applies **from the date an application is filed until 12 months after the later of** the date a letter of determination is issued or a certificate of occupancy is issued. *See* proposed LAMC § 49.7.37(B); Attachment G, p. 4. This is different from the motion in Attachment B, which would lift the ban 12 months after a decision on the application is made. Using the date an application is filed as the trigger provides certainty about when the ban begins and who the banned parties are. Extending the ban through 12 months after the entitlement process or the development project is complete more accurately reflects the reality that

development processes and projects typically remain active for many years and may involve discretionary amendments and inspections.

- (7) To facilitate understanding and implementation of the ban, to more robustly inform the public about development in the City, and to foster enforcement of the ban, the recommended language includes a **disclosure** requirement similar to the disclosure required of City bidders in LAMC §§ 49.7.35(B)(3)–(4). The disclosure would identify the project, the applicant, and the principals. We recommend that the disclosure be made through an electronic filing system created by the Ethics Commission. We also recommend that sufficient funding be provided to create and maintain the system, as it was for the contractor filing system in LAMC § 49.5.11(B)(7). This was not addressed in the motions in Attachments A and B. *See* proposed LAMC § 49.7.37(C); Attachment G, pp. 4-5.
- (8) The ban includes a provision that prohibits a person who violates the restrictions from being an applicant or principal on a new application for 12 months after the **determination of violation**. This is similar to the debarment provision in LAMC § 49.7.35(C) and was not addressed in the motions in Attachments A and B. *See* proposed LAMC § 49.7.37(E); Attachment G, p. 5.
- (9) The ban includes a modification to the mandatory **contributor certification**. Contributors are currently required to certify that they are not prohibited from making a contribution by virtue of being a lobbying entity or a bidder or contractor, and we believe they should also be required to certify that they are not prohibited from making a contribution by virtue of being an applicant or principal for a land use entitlement. *See* proposed LAMC § 49.7.16(B)(3); Attachment G, p. 1.
- (10) The ban would require renumbering the last four sections of the CFO. *See* proposed LAMC §§ 49.7.38–41; Attachment G, p. 5.

If adopted by the City Council, the motion in Attachment B would ask the Ethics Commission to report on requiring elected City officials to recuse themselves from voting on issues related to a land use entitlement when they have accepted a contribution from an applicant or principal. We believe that commenting on such a requirement is premature, because we do not know if or how City law will be amended. In addition, we believe a recusal provision must extend to fundraising and bundling if it is going to prevent official action on matters involving actual or perceived conflicts of interests. Therefore, we believe that evaluating a potential recusal requirement is appropriate and meaningful only when we know whether a ban on contributions and fundraising will be adopted and, if so, how that ban applies.

D. Behested Payments

1. Background

State law requires an elected City official to file a report with the Ethics Commission when, at the behest of the elected official, a person makes payments totaling at least \$5,000 over

the course of a year to third parties for legislative, governmental, or charitable purposes. Cal. Gov't Code §§ 82004.5, 84224. The state has adopted Form 803 for reporting behested payments, and a copy of the form is provided in Attachment H.

2. Considerations

In 2014, the Ethics Commission recommended that the disclosure threshold for payments behested by elected City officials be reduced to \$1,000. The City Council declined to implement the recommendation at that time. *See* Council File No. 12-1269-S3.

The motion in Attachment B would prohibit elected City officials from soliciting behested payments, but the prohibition would apply only to developers and their principals. As with banning developer contributions, there are multiple considerations regarding the regulation of behested payments. Most of the behested payments reported by City officials over the past six years went to government agencies or charitable organizations. These entities provide great value to the public, and helping to ensure that they are well funded is an appropriate function of public officials. Banning behested payments could have a negative impact on a charitable organization's ability to raise funds.

However, like the potential for corruption that exists with regard to campaign money, there is also the potential for actual or perceived corruption in the realm of behested money, particularly when payments are solicited from persons who have business with the City. Recent media reports have shined a light on this potential. *See, e.g.*, "L.A. City Councilman Used His Position to Help Wife Raise Funds for Private School, Ex-Aides Say", 11/30/2018, ktla.com/2018/11/30/l-a-city-councilman-used-his-position-to-help-wife-raise-funds-for-private-school-ex-aides-say/ ; "A tricky area of philanthropy': LA mayor solicits millions for his favored causes", 8/23/2017, www.scp.org/news/2017/08/23/74917/la-mayor-garcetti-behested-payments/". Public concern extends even to staff in elected offices. *See, e.g.*, "L.A. deputy mayor raised money from developers with major projects in downtown, records show", 1/30/2019, latimes.com/local/lanow/la-me-ln-deputy-mayor-fundraising-20190130-story.html.

The state's disclosure requirement provides some transparency without banning behested payments altogether. All behested payment reports filed with the Ethics Commission since 2000 may be searched and viewed online at ethics.lacity.org/data/ethics/behested-payment-reports/. Since January 1, 2014, \$49,690,667 in behested payments have been reported by elected City officials: \$39,816,133 reported by the Mayor's office; \$8,924,564 reported by the City Attorney's office; \$150,000 reported by the Controller's office; and \$799,970 reported by City Council offices. A total of 597 behested payments were reported.

The ten payors who were reported as having made the most behested payments over the past five years are identified in the table on the next page. Of the top 10 payors, eight had business with the City during that five-year period, which was documented in City databases identifying lobbying entities, contractors, persons with business before the City Council, and persons who received payments through the Controller's office. The other two, the California Attorney General's Office and La Vida Feliz Foundation, could have been restricted sources (discussed below in subsection 3(a)) without being documented in one of the databases. For

example, they could have attempted to influence an elected official directly in a matter that had a material financial effect on them.

Payor	Behested Payments Made 2014-2018
California Attorney General's Office	\$4,379,380
Walt Disney Company (and related entities)	\$3,023,325
Los Angeles Clipper Foundation	\$3,000,000
Bloomberg Foundation (and related entities)	\$2,799,900
Orrick, Herrington & Sutcliffe LLP	\$2,191,828
La Vida Feliz Foundation	\$2,000,000
Annenberg Foundation (and related entities)	\$1,870,000
Covington & Burling, LLP	\$1,631,103
Los Angeles Dodgers, LLC (and related entities)	\$1,500,000
The Weingart Foundation	\$1,410,000

Of the 597 behested payments during the past five years, at least 311 (52 percent) were made by payors who had business with the City (within the 12 months before or after their behested payments) that was documented in City databases identifying lobbying entities, contractors, persons with business before the City Council, and persons who received payments through the Controller's office. The total dollar value of their behested payments is \$26,079,027, or 52 percent of all behested payments reported since January 1, 2014.

We believe these numbers are conservative. For example, a payor could have had business with the City 13 months prior to a behested payment. In addition, potential ties between individuals and entities are very difficult to determine. A business with a City contract, for example, would be counted among the payors who had business with the City, but that business's CEO might not. Finally, as noted above, a payor could have qualified as a restricted source (discussed below) without appearing in a City database by virtue of attempting to influence an elected official.

3. Options

Several options exist for enhanced regulation of behested payments. The various options may coexist, and language to implement each of the options below is provided in Attachment I, as an amendment to the Governmental Ethics Ordinance.

a. *Ban Behested Payments*

Behested payments could be banned. If a ban is approved, we recommend that it apply more universally to any restricted source, rather than being limited to just developers. *See* proposed LAMC § 49.5.5(C); Attachment I, p. 1.

A restricted source for an elected official is a lobbyist, a lobbying firm, a bidder, a contractor, a person who attempted to influence the elected official in the previous 12 months

regarding an action that would have a material financial effect on the person, and a person who was a party to a proceeding involving a license, permit, or entitlement that, in the previous 12 months, was pending before the elected official or a body of which the official is a member. LAMC § 49.5.2(J)(1). The potential for actual or perceived corruption exists whenever a person has a financial interest in a City decision, whether that decision pertains to land use or not. In addition, the City has long determined that financial interactions between City officials and restricted sources—which include lobbying entities, bidders and contractors, and persons seeking land use entitlements—should be limited and subject to a higher level of scrutiny. *See, e.g.*, LAMC §§ 49.5.7(C)(2), 49.5.8(C), 49.5.9(B).

While a ban on behested payments would go a long way toward combatting perceived or actual corruption, we also believe four exceptions should be incorporated. The exceptions would permit behested payments that are solicited because of a state of emergency, that are solicited through a communication to the general public, that solicit services (rather than dollars) provided to the City, and that occur because an elected official is involved in a grant application on behalf of the City. *See* proposed LAMC § 49.5.5(C); Attachment I, p. 1.

These exceptions would maintain the integrity of the ban while also acknowledging that there are scenarios in which the threat of actual or apparent corruption is significantly reduced. For example, we believe that an elected official should be able to solicit behested payments to the Red Cross, for example, when it is providing assistance to City residents in the wake of a disaster. We believe it is appropriate to publicly solicit toys during the holidays for disadvantaged children and set out boxes in City Hall to collect them. We believe the City's efforts to secure state, federal, or nonprofit grant money should not be hindered by an elected official's participation in the application process. We further believe that pro bono services provided to the City function as an extension of government and benefit the public with necessary and fiscally prudent resources.

Finally, we recommend stating that an elected official's staff member is acting as an agent of the elected official when soliciting a behested payment. *See* proposed LAMC § 49.5.5(C)(3); Attachment I, p. 2. The state has advised that it interprets its definition of "agent" in this way, and we believe it is important to provide proper notice of the extent of the regulation to all affected parties. *See* Cal. Gov't Code § 82004.5; Fair Political Practices Advice Nos. A-11-063, A-97-142.

b. Require More Detailed Disclosure

Another option is to require more detailed disclosure about behested payments. Currently, elected officials are required to report only the name and address of payors on Form 803. Additional comments can be provided in Section 5 of the form, and City law could require that City officials identify in the comment section whether the payor is a lobbying entity, a bidder or contractor, or a development applicant or principal. *See* proposed LAMC § 49.5.5(C)(2); Attachment I, p. 2.

To obtain the required information, a City official may ask the payor if the payor falls into any of those categories. A City official may also refer to the Ethics Commission's online

filing systems to identify lobbying entities, bidders, and contractors. To provide additional resources for this enhanced disclosure, the funding and creation of an electronic disclosure system for development applicants and principals should also be required. *See* proposed LAMC § 49.7.38(A)(2); Attachment F, p. 4.

c. Lower the Disclosure Threshold

A third option is to lower the disclosure threshold for behested payments. The current state threshold is \$5,000, and the previous Ethics Commission recommendation was a threshold of \$1,000. One of the 2014 justifications for reducing the disclosure threshold to \$1,000 was that, at the time, a person qualified as a committee under state law by spending or receiving \$1,000 in a calendar year. *See* Council File No. 12-1269-S3.

In the intervening five years, state law has changed. A person now qualifies as a committee by receiving \$2,000 in a calendar year. Cal. Gov't Code § 82013(a). Using the same 2014 rationale while also accounting for changes in CPI, the disclosure threshold could be reduced \$2,500, or half the current threshold. *See* proposed LAMC § 49.5.5(C)(1); Attachment I, pp. 1-2.

D. Conclusion

We recommend approving a ban on contributions from and fundraising by non-individuals and developers who are individuals, as discussed in Section B. We also recommend approving the regulation of behested payments, as discussed in Section B.

Any approved recommendations will be transmitted to the City Council for their consideration and action.

Attachments

- A Motion, Council File No. 17-0042*
- B Motion, Council File No. 19-0046*
- C Kaufman Legal Group Memorandum, 5/24/2018 (not recommended)*
- D Planning Department application for discretionary decision*
- E Planning Department application for administrative review*
- F Language to ban non-individuals and individual developers (preferred)*
- G Language to ban individual and non-individual developers*
- H CA Form 803 (Behested Payment Report)*
- I Language to regulate behested payments*
- J Public comments*

MOTION

During Los Angeles' March 2015 election, only one in ten eligible voters chose to submit ballots. This low voter turnout is likely due, in part, to voters' belief that they can do little to influence local elections and policies.

This belief is reinforced when developers, and others who have business before the City of Los Angeles contribute widely to political campaigns, and in some cases, flout campaign finance rules entirely. Unlike the City's ban on campaign contributions from companies seeking City contracts, no such ban currently exists for developers seeking City approvals on their potentially-lucrative projects.

Previously, legal uncertainty prevented such a ban; however, in 2004 the City of San Diego implemented a ban on donations from special interests, and this ban was upheld by the U.S. Court of Appeals for the Ninth Circuit in 2011, citing the importance of the "anticorruption and anticircumvention interests" of the restrictions. This recent court decision forges the legal path for Los Angeles to move forward.

Limiting contributions from certain non-individuals can also improve election turnout. When New York City restricted contributions from some non-individual entities, its share of campaign contributions to candidates by individuals rose from 61% in 1997 to 92% in 2013, pointing toward the effectiveness of these measures in their mission to create more local elections driven by individual voters, donors, and stakeholders.

WE THEREFORE MOVE that the Los Angeles City Ethics Commission be requested to prepare an ordinance similar to the 2011 Measure H restrictions approved by the voters, to prohibit contributions to City elected officials and candidates for City office from developers and their principals with development projects currently or recently being considered for discretionary approval by the City.

WE FURTHER MOVE that the Ethics Commission, in coordination with the City Attorney and the Planning Department, be requested to report on possible options for the definition of a "developer" to ensure as wide a net as possible is cast, in addition to exploring whether contractors and subcontractors on development projects requiring discretionary council approval should be included in this ban.

WE FURTHER MOVE that the Ethics Commission be requested to report on best practices, in line with the spirit and intent of this motion, from other jurisdictions who have implemented such bans. In particular, the Metro model based on recusal from voting on contracts where the Board member has accepted monetary contributions should be examined as a possible alternative to a full ban if it proves to be a more constitutionally permissible model.

WE FURTHER MOVE that the Ethics Commission be requested to prepare an ordinance to require campaign committees to provide additional information on non-individual entity contributors, including a category that denotes contributions derived from developers and their principals.

WE FURTHER MOVE that the Ethics Commission be requested to prepare an ordinance to require a signed affidavit that requires the contributor to positively affirm, under penalty of perjury, that the contribution is being made by the contributor, that the contributor is not being reimbursed, and that the contributor does not have any open applications for discretionary approval of development projects before the city, in addition to any other city ethics laws that should be included in the affidavit.

WE FURTHER MOVE that the City Administrative Officer be instructed and the Ethics Commission be requested to report on the costs and benefits of increasing the size of enforcement staff at the Ethics Commission to increase the number of inspections and audits that can be carried out to reduce the incidences of campaign finance fraud and improve transparency, and, to report on the costs of creating an accessible and easy-to-navigate website with front page access to the whistleblower hotline.

CO-PRESENTED BY Paul Kerkorian
PAUL KREKORIAN
Councilmember, 2nd District

CO-PRESENTED BY David Ryu
DAVID RYU
Councilmember, 4th District

CO-PRESENTED BY Joe Buscaino
JOE BUSCAINO
Councilmember, 15th District

CO-PRESENTED BY [Signature]
SECONDED BY [Signature]

JAN 10 2017

ORIGINAL

MOTION

Developer Contribution Restrictions

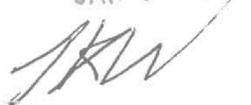
The City of Los Angeles has enacted a robust set of laws designed to prevent any perception that the official actions of elected officials are influenced by campaign contributions. These laws include outright prohibitions on campaign contributions from registered lobbyists, restrictions on contributions by businesses that are contracting (or seeking to contract) with the City, and prohibitions on solicitations of contributions from City employees and commissioners. However, no such comparable regulations exist for developers seeking City approvals for potentially lucrative projects.

Enacting developer contribution restrictions would improve the confidence of Los Angeles City residents and businesses, including developers, that discretionary approvals of development projects are made on the merits and without regard to campaign contributions. This would further improve the confidence of Los Angeles City residents and voters in the political process and continue the City’s efforts to empower small dollar donors, as recently achieved by the passage of the 6:1 Matching Funds Program laid out in Council File 15-1088-S1.

WE THEREFORE MOVE that the City Attorney, in consultation with the Ethics Commission staff, be requested to prepare and present a draft Ordinance, similar to the 2011 Measure H restrictions approved by City of Los Angeles voters, to prohibit contributions to City elected officials and candidates for City office from “Restricted Developers.” “Restricted Developers” shall be defined to include the owner or owners of real property (and if ownership is held in the name of a legal entity, the term shall also include the principals of the entity), when (a) an application for any significant Planning Entitlement Process administered by the Department of City Planning for the property has been filed, and (b) the completion of the Planning Entitlement Process requires approval or other action by City elected officials or candidates for City office, and (c) the Planning Entitlement Process involved would allow the construction or addition of more than 4,000 square feet of residential floor area or 15,000 square feet of commercial floor area. The prohibition on contributions described herein would extend from the date of the application to a date 12 months following the final resolution of the application.

WE FURTHER MOVE that the Chief Legislative Analyst, in consultation with Ethics Commission staff, be requested to report back on a strategy for a draft Ordinance restricting city officials from requesting, and developers and their principals from providing, behested payments under the same conditions described herein.

WE FURTHER MOVE that the City Attorney, in consultation with the Ethics Commission staff and the Chief Legislative Analyst, consider and provide recommendations for the application of similar restrictions to donations from builders requesting approvals from the Governing Board of the Los Angeles Unified School District.

JAN 15 2019


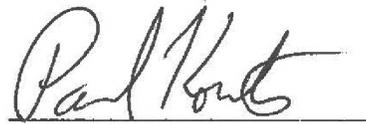
WE FURTHER MOVE that the City Attorney be requested to prepare and present an Ordinance amending Section 49.7.16 of the Los Angeles Municipal Code to require contributors to certify, under penalty of perjury, that the contribution is being made according to the City's applicable ethics and campaign finance laws, including an affidavit certifying that the contributor is not a Restricted Developer prohibited from contributing as described herein.

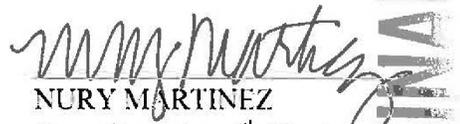
WE FURTHER MOVE that the Los Angeles City Ethics Commission be requested to report back to the Los Angeles City Council on their recent discussions and recommendations regarding prohibiting campaign contributions from non-individual entities (Humans Only or Federal Models) and the implementation of a model, similar to that employed by the Los Angeles Metropolitan Transit Authority (LA METRO), requiring that elected officials be recused from voting on issues relating to the Planning Entitlement Process for a property owned by a Restricted Developer where the official has accepted contributions from that Restricted Developer.

CO-PRESENTED BY:


DAVID E. RYU
Councilmember 4th District


PAUL KREKORIAN
Councilmember 2nd District


PAUL KORETZ
Councilmember 5th District


NURY MARTINEZ
Councilmember 6th District


MIKE BONIN
Councilmember 11th District


JOE BUSCAINO
Councilmember 15th District

ORIGINAL

SECONDED BY:



KAUFMAN LEGAL GROUP

M E M O R A N D U M

Stephen J. Kaufman
George M. Yin
Stacey J. Shin

777 South Figueroa Street, Suite 4050
Los Angeles, California 90017

to: Councilmember David Ryu

cc: Sarah Dusseault, Chief of Staff
Nicolas Greif, Director of Policy and
Legislation

from: Stephen J. Kaufman
George M. Yin
Stacey J. Shin

re: Restrictions on Political Contributions to City of Los Angeles Elected Officials
by Persons with Large Development Projects

file no.: RYU2719.001

date: May 24, 2018

Main: (213) 452-6565
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I. Introduction

There is a widespread perception, fostered by recent media stories, that developers engage in questionable behavior with local government officials to get their projects approved. The City of Los Angeles has enacted laws to curb “pay to play” conduct by *lobbyists* and government *contractors* (e.g., LA City Measure H (2011)); however, the City has not adopted comparable regulations to combat developers who may seek to channel campaign contributions to City elected officials to obtain favorable decisions for their development projects. For this reason, Councilmember Ryu, together with Councilmembers Krekorian and Buscaino, introduced a motion in the Rules, Elections and Intergovernmental Committee to request that the Ethics Commission explore the feasibility of an ordinance prohibiting political contributions to City elected officials by persons with large development projects who have approvals pending before City decision makers.

We have prepared this memorandum to analyze various legal questions presented by such a proposed ordinance, which could be enacted either by City Council or the City’s voters, and to discuss how such an ordinance may be framed. The scope of the contribution prohibition will be discussed in Section II; the operation of the ordinance will be addressed in Section III; and constitutional considerations will be addressed in Section IV. A sample ordinance is also attached to this memorandum for discussion purposes.

II. Who Would Be Subject to the Contribution Prohibition? (See Draft Ord. § 49.7.50.)

Courts have stated that “[r]epresentative government would be thwarted by depriving certain classes of voters (i.e., developers, builders, engineers and attorneys who are related in some

fashion to developers) of the constitutional right to participate in the electoral process.”¹ In addition, some have pointed out that the word “developer” can mean different things to different people. Thus, rather than simply prohibiting political contributions from a class of persons referred to as “developers,” any new law should specifically prevent “pay to play” conduct in the Planning process by prohibiting contributions from *persons* with large development projects (and their principals) to City elected officials (and candidates for such offices) who have discretionary approval authority over their projects. And, because persons with small development projects, such as regular homeowners and owners of smaller commercial properties, have not been identified as presenting a corruption problem, they should not be subject to the political contribution prohibition.

III. How Would a Contribution Prohibition Operate?

A. The Prohibition Should Apply to Persons Seeking Approval in the Planning Entitlement Process (Following Building & Safety Review). (See Draft Ord. §§ 49.7.51, 49.7.50.)

To focus a contribution prohibition law properly, the steps involved in the City’s Planning process must be considered. Typically, when a person wants to engage in the City’s Land Use Permit Process they begin by going to the Los Angeles Department of Building & Safety (“LADBS”) to check land use regulations on the property, discuss the project with LADBS staff, and apply for necessary building permits. If the proposed project meets all City regulations, the applicant’s plans are approved by LADBS and a building permit is issued. This process of “by right development” does not involve the possible intervention of elected officials; rather, it mainly involves a process overseen by LADBS staff. For this reason, the general LADBS process should not trigger restrictions on political contributions to any elected City official.

However, if a project does not conform to City land use regulations, or it otherwise requires approval by the Department of City Planning (“Planning”), LADBS will instruct the applicant to go to Planning to apply for the necessary land use approvals. Because most projects involved in the Planning process involve a public hearing before the Area Planning Commission, with decisions appealable to the City Planning Commission (who are appointed by the Mayor and confirmed by the City Council), or the City Council itself, the potential for quid pro quo corruption may arise, since some applicants may seek to contribute to elected officials who have the authority to change zoning rules, grant approvals, or give favorable appeals determinations. Therefore, the beginning of the planning process might be an appropriate starting point to prohibit political contributions.

However, the new law should exempt people going through the entitlement approval process but whose projects are below certain size thresholds. As mentioned above, average homeowners and owners of smaller commercial properties, have generally not been involved in reported

¹ (*Woodland Hills Residents Ass’n. v. City Council of L.A.* (1980) 26 Cal. 3d 938; 946-947.)

corruption scandals and abuses; thus, they should not be made subject to the contribution prohibitions. We therefore recommend that persons with Planning applications for residential projects below 4,000 square feet in size, and commercial projects below 15,000 square feet in size, be exempted from the contribution prohibitions.

B. Notice to Applicants and Disclosure Form to be Completed by Each Applicant. (See Draft Ord. § 49.7.50(C), (D), (E).)

A proposed ban on contributions should also include notice provisions to satisfy due process concerns. First, the proposed ordinance should require the Department of City Planning to provide notice to every person who applies for a “Planning Entitlement Process” about the campaign contribution prohibitions. It is prudent and fair to require such prior written notice to all persons that may be subject to the prohibition because violations of the proposed ordinance could result in serious consequences, such as the voiding of a person’s application, as well as prohibiting a person from filing a new application for six months.

Second, the proposed ordinance should require each person submitting a Planning application to also submit a completed form to the Department of City Planning, disclosing relevant information about the applicant and the project, such as the names and titles of the principals of the applicant. Like Measure H, it is recommended that the City Ethics Commission create and issue these forms.

C. Contribution Prohibition Applicable to Principals (See Draft Ord. § 49.7.50(A)(3).)

Since “persons” with large development projects are usually firms whose actions are directed by various principals, it is reasonable for contributions from such principals to also be included in the contribution prohibition. As discussed below, similar prohibitions on principals have been upheld in cases involving prohibitions on government contractor contributions.

D. Contribution Prohibitions Only Apply to Elected Officials Involved in Planning Approvals and Appeals. (See Draft Ord. § 49.7.50(A).)

Prohibitions on contributions should be limited to contributions made to elected officials who are involved in the Planning approval process and appeals. Specifically, contributions to the City Controller should not be subject to the prohibition.

E. Temporal Scope of Developer Contribution Prohibition (See Draft Ord. § 49.7.50(A)(2).)

Councilmember Ryu has proposed that a prohibition on contributions be kept in place from the time that the applicant submits an application in the Planning process until 12 months after a decision on the applicant’s permit or entitlement is rendered (including any appeals). Courts

have generally held that temporal prohibitions on contributions are a very “marginal restriction upon the contributor’s ability to engage in free communications.”²

Indeed, a temporal ban is justifiable because it will deter applicants from engaging in corrupting behavior to influence a favorable result after submitting their applications and prevent applicants from seeking to “reward” decisionmakers for making favorable decisions for a reasonable time after a decision is made.

IV. Can Prohibitions on Political Contributions by “Developers” Be Drafted to Pass Constitutional Muster?

Any restrictions on political contributions present First Amendment constitutional issues. We discuss the applicable Constitutional standards and what must be done to satisfy them below.

A. Any Restriction on Political Contributions Must Satisfy First Amendment Constitutional Review Under the “Closely Drawn” Test.

In a long line of cases beginning with *Buckley v. Valeo*, 424 U.S. 1 (1976), the U.S. Supreme Court has distinguished between laws restricting campaign *expenditures* and campaign-related *speech* from laws restricting campaign *contributions*.³ The Court has determined that laws limiting campaign *expenditures* and campaign-related *speech* “impose significantly more severe restrictions on protected freedoms of political expression and association than do” laws limiting campaign *contributions*.⁴ Consequently, the Supreme Court has held that laws limiting *campaign expenditures* and *campaign-related speech* must pass the “strict scrutiny” standard, the Court’s most stringent level of review.⁵

In contrast, laws limiting *campaign contributions*, are subject to a less stringent standard.⁶ This is because *contribution* regulations are deemed to be “merely ‘marginal’ speech restrictions,” since contributions “lie closer to the edges than to the core of political expression.”⁷ Thus, the Court has declared that “instead of requiring contribution regulations to be narrowly tailored to serve a compelling interest” as they would be under the strict scrutiny standard, a law restricting *contributions* “passes muster if it satisfies the lesser demand of being ‘closely drawn’ to match a ‘sufficiently important interest.’”⁸

² (*Thalheimer v. City of San Diego*, 645 F. 3d 1109, 1122 (9th Cir. 2011) (upholding a temporal ban on contractor contributions in San Diego for 12 months preceding city primary elections); see also *Gable v. Patton*, 142 F. 3d 940, 944, 951 (upholding a prohibition on gubernatorial candidates accepting contributions during the 28 days preceding a primary or general election).)

³ (See *Green Party of Conn. v. Garfield*, 616 F. 3d 189, 198 (2nd Cir. 2010).)

⁴ (*Buckley*, 424 U.S. at 23.)

⁵ (*Citizens United v. Fed. Election Comm’n*, 130 S. Ct. 876, 898 (internal quotation marks omitted).)

⁶ (See *Fed. Election Comm’n v. Beaumont*, 539 U.S. 146, 161 (2003).)

⁷ (*Id.*)

⁸ (*Id.* at 162.)

This so-called “closely drawn” standard has been consistently applied to evaluate *First Amendment* challenges to all laws regulating campaign contributions, including those imposing restrictions on contributions.⁹ The Court in *Federal Election Commission v. Beaumont*, specifically rejected the view that contribution prohibitions are subject to strict scrutiny review.¹⁰ Thus, an ordinance prohibiting political contributions imposed on applicants with large development projects involved in the planning process need only be “closely drawn” to a sufficiently important government interest.

B. Courts Have Held that Restrictions on Contributions Must Serve an Anticorruption Interest.

In identifying what is a “sufficiently important government interest,” courts have held that “preventing corruption or the appearance of corruption are the only legitimate and compelling interests thus far identified for restricting campaign finances.”¹¹ More recently, the U.S. Supreme Court has further “narrowed the scope of the [valid] anti-corruption rationale to cover ‘quid pro quo corruption only, as opposed to money spent to obtain ‘influence over or access to elected officials.’” (*Thalheimer*, 645 F. 3d at 1119, quoting *Citizens United*, 130 S. Ct. at 910.)

At present, there are no reported cases addressing the constitutionality of prohibiting contributions by “developers.” However, *any* contribution prohibition must be justified by an “anticorruption” interest that is aimed at “combatting both *actual* and the *appearance* of *quid pro quo corruption*.”¹² To determine the parameters that such restrictions can take, it is instructive to look at recent court decisions upholding bans on political contributions by government contractors.¹³

C. Recent Cases Addressing Prohibitions on Political Contributions by Contractors in Connecticut and Hawaii are Instructive.

In *Green Party of Connecticut v. Garfield*, 616 F.3d 189 (2nd Cir. 2010), a Second Circuit case closely followed in the Ninth Circuit, the court reviewed Connecticut’s Campaign Finance Reform Act (CFRA), which the state legislature “passed in response to several corruption

⁹ (See e.g., *Randall v. Sorrell*, 548 U.S. 230, 253 (2006) (plurality opinion); *McConnell v. Fed. Election Comm’n*, 540 U.S. 93, 138 n.40 (2003), *overruled in part on other grounds by Citizens United*, 130 S. Ct. at 913; *Beaumont*, 539 U.S. at 161.)

¹⁰ (See *Beaumont*, 539 U.S. at 162.)

¹¹ (*Thalheimer*, 645 F. 3d at 1118 quoting *FEC v. Nat’l Conservative Political Action Comm.*, 470 U.S. 480, 496-97 (1985); see also *Citizens United*, 130 S. Ct. at 901-902 (2010); *Davis v. FEC*, 554 U.S. 724, 741 (2008).)

¹² (*Yamada v. Snipes*, 786 F. 3d 1182, 1205 (9th Cir. 2013) (emphasis added); see also *Green Party*, 616 F. 3d at 200.)

¹³ Prior to the enactment of City of Los Angeles Measure H in 2011, which imposed restrictions on political contributions by City contractors, the City Attorney’s Office prepared a report (No. R10-0358 dated October 18, 2010) entitled “Possible Ballot Measure to Prohibit Contract Bidders from Contributing and Fundraising for City Officials.” The report discussed numerous cases in California and elsewhere in which campaign contribution restrictions on government contractors were upheld. That report may still be referred to, so most of those examples will not be addressed herein.

scandals in Connecticut.”¹⁴ The most widely publicized of the scandals in Connecticut involved the state’s then Governor John G. Rowland, who in 2004 resigned after he was accused of improperly accepting tens of thousands of dollars in gifts and services from state contractors in exchange for the award of state contracts. In 2005, Rowland pled guilty to charges related to the scandal.¹⁵

The Rowland scandal was but one of many corruption scandals in Connecticut involving elected officials in state and local government, helping to earn the state the nickname of “Corrupticut.”¹⁶ The existence of these instances of “actual” quid pro quo corruption was a factor in the 2nd Circuit’s “closely drawn” analysis. Ultimately, the CFRA’s contractor contribution prohibition withstood First Amendment constitutional scrutiny because it was deemed to be closely drawn to combatting actual and perceived quid pro quo corruption involving government contractors and elected officials.¹⁷

The Green Party court initially expressed some skepticism of CFRA’s ban on contributions by “principals” of contractors, defined in CFRA as members of a contractor’s board of directors; persons with an ownership interest of 5% or more in the contracting business; the president, treasurer, or executive vice president of the contracting entity; and any officer or employee of either a business entity or nonprofit with managerial or discretionary responsibilities with respect to a state contract.¹⁸ However, the court ultimately held that because “the record shows that the dangers of corruption associated with contractor contributions are so significant in Connecticut . . . [the Legislature] should be afforded leeway in its efforts to curb contractors’ influence on state lawmakers.”¹⁹ Because the legislation was elicited by actual corruption scandals, the court also deferred to the Legislature on extending the contribution prohibition to contractor principals.²⁰

On the other hand, the court struck down a contribution prohibition on *lobbyists* and their families because *none* of the scandals that supposedly instigated the law’s passage involved *lobbyists*.²¹ Consequently, the court found that an outright prohibition on lobbyist contributions was not closely drawn to achieve the state’s anticorruption interest.²²

¹⁴ (*Green Party*, 616 F. 3d at 193; see also *Yamada*, 786 F. 3d at 1205-1206.)

¹⁵ (*Green Party of Conn. v. Garfield*, 537 F. Supp. 2d 359, 361 (Dist. Conn. 2008).)

¹⁶ (*Green Party*, 616 F.3d at 193.) “Between 1999 and 2005, a number of elected officials and their associates in Connecticut resigned and pleaded guilty to corruption charges. This includes State Treasurer Paul Silvester, who invested over \$500 million in state pension funds with financial institutions that ‘kicked back’ money, via associates and friends, to his campaign committee; and State Senator Ernest Newton II, who received a small \$5,000 bribe from a non-profit organization that sought a \$100,000 state grant.” (Craig Holman & Michael Lewis, *Pay-to-Play Laws in Government Contracting and the Scandals that Created Them*, Public Citizen, 8 (June 26, 2012), <https://www.citizen.org/sites/default/files/wagner-case-record.pdf>.)

¹⁷ *Green Party*, 616 F.3d at 201-202.)

¹⁸ (*Id.* at 202-203.)

¹⁹ (*Id.* at 203.)

²⁰ (*Id.*)

²¹ (*See id.* at 205-206.)

²² (*Id.*)

In *Yamada v. Snipes*, 786 F. 3d 1182 (9th Cir. 2013), the Ninth Circuit addressed a government contractor prohibition enacted by the Hawaii state legislature in response to “pay-to-play” scandals involving legislators and the “widespread appearance of corruption that existed at the time of the legislature’s actions.”²³ As the *Yamada* court noted in a decision that followed the Second Circuit’s *Green Party* decision, a “ban unequivocally addresses the perception of corruption because by totally shutting off the flow of money from contractors to state officials, it eliminates any notion that contractors can influence state officials by donating to their campaigns.”²⁴ The *Yamada* court held that the contribution ban “is closely drawn because it targets direct contributions from contractors to officeholders and candidates, the contributions most closely linked to actual and perceived quid pro quo corruption.”²⁵ Thus, reports of actual corruption and scandals, helped justify the contribution prohibition.

Notably, the *Yamada* court rejected an argument that the contractor contribution prohibition was unconstitutional as applied to contributions made to lawmakers and candidates who neither award nor oversee state contracts, since Hawaii’s legislature as a whole considers bills concerning procurement.²⁶ Indeed, the *Yamada* court clarified that “[c]losely drawn scrutiny requires ‘a fit that is not necessarily perfect, but reasonable,’ and Hawaii’s contractor contribution ban is a reasonable response to the strong appearance of corruption that existed at the time of the legislature’s actions.”²⁷

In the current context, a ban on contributions to City elected officials involved in the Planning process, even ones that do not directly play a role in particular Planning decisions, may be defended using the aforementioned rationale. However, a factual showing of actual or perceived corruption in the planning process must be established to support that rationale.

D. Factual Findings Evidencing the Existence of Actual Corruption and Appearance of Quid Pro Quo Corruption Must be Made

Federal cases addressing contribution prohibitions, such as those cited above in Connecticut and Hawaii, highlight the importance of showing that a contribution ban will address reports of actual, rather than speculative, corruption.²⁸ Indeed, where contribution prohibitions were

²³ (*Id.* at 1206.)

²⁴ (*Id.* at 1205 (internal quotation marks omitted) quoting *Green Party*, 616 F. 3d at 205; see also *Ognibene v. Parkes*, 671 F. 3d 174, 185 (2d Cir. 2011) (“When the appearance of corruption is particularly strong due to recent scandals . . . a ban may be appropriate.”)

²⁵ (*Yamada*, 786 F.3d at 1206.)

²⁶ (*Id.*)

²⁷ (*Id.*)

²⁸ The Ninth Circuit has stated that novel restrictions may require some form of additional showing to support the governmental interest served and to demonstrate how the restriction addresses that interest. (See *Citizens for Clean Gov’t v. City of San Diego*, 474 F. 3d 647, 652-653 (9th Cir. 2007) (concerning application of San Diego contribution limits in the signature gathering phase of candidate recall petitions).) The “extent” of such a showing is unclear, although courts have stated: “[t]he quantum of empirical evidence needed to satisfy heightened judicial scrutiny . . . will vary up or down with the novelty and plausibility of the justifications raised.” (*Citizens for Clean*

imposed on parties that played no reported role in the sort of corrupt behavior or scandals being targeted, such as lobbyists in the Connecticut context, those provisions were struck down as not closely drawn to address actual and apparent corruption. Thus, any proposed City ordinance should include findings that seek to show that contribution prohibitions are not merely targeting a speculative problem, but rather an actual and perceived quid pro quo corruption problem. Such findings may be supported by prosecutions or by news media reports alleging or documenting corrupt conduct.

Yet, courts have recognized that showing the existence of actual and perceived quid pro quo corruption presents challenges for regulators. Accordingly, some courts have held that “[s]ince neither candidate nor contributor is likely to announce a quid pro quo, *the appearance of corruption has always been an accepted justification for . . . campaign contribution limitations.*”²⁹ It therefore appears that laws enacting contribution limits may be upheld so long as they seek to address at least the “appearance of corruption.” As the district court in *Yamada v. Weaver* stated,

[B]ecause the scope of quid pro quo corruption can never be reliably ascertained, the legislature may regulate certain indicators of such corruption or its appearance, such as when donors make large contributions because they have business with the City, hope to do business with the City, or are expending money on behalf of others who do business with the City. Furthermore, such donations certainly feed the public perception of quid pro quo corruption, and this alone justifies limitations or perhaps an outright ban.³⁰

Thus, recent court decisions have signaled a potentially less stringent approach in contribution cases, whereby contribution prohibitions will be upheld where they satisfy “closely drawn” analysis and where the “appearance” of quid pro quo corruption is shown to exist. Nevertheless, both the Hawaii and Connecticut decisions were premised on the desire to combat actual “pay-to-play” scandals. Thus, proceeding with a contribution prohibition without a showing of actual “pay-to-play” corruption, may entail some risk.

Gov’t, 474 F. 3d at 652-653.) It is not known whether courts would deem the contribution prohibitions contemplated here to be “novel;” however, the prior cases involving contractor prohibitions are arguably similar. Clearly some reasonable showing must be made. It is not enough to show “hypothetical situations not derived from any recorded evidence or governmental findings” or “vague allusions to practical experience.” (*Thalheimer*, 645 F. 3d 1109, 1121 quoting *Citizens for Clean Gov’t*, 474 F. 3d at 653-54.) The Ninth Circuit has stated, “[d]espite the flexibility implied by its sliding scale approach, the Court has ‘never accepted mere conjecture as adequate to carry a First Amendment burden.’” (*Citizens for Clean Gov’t*, 474 F. 3d at 653 quoting *Nixon v. Shrink Mo. Gov’t PAC*, 528 U.S. 377, 392 (2000).)

²⁹ (*Yamada v. Weaver*, 872 F. Supp. 2d 1023, 1057-58 (Dist. Haw. 2012) (emphasis added) quoting *Ognibene v. Parkes*, 671 F. 3d 174, 187 (2d Cir. 2011).)

³⁰ (*Id.* quoting *Ognibene*, 671 F. 3d at 187, citing *Citizens United*, 130 S. Ct. at 908, 910.)

E. Findings Concerning “Indicators” of Actual and Perceived Corruption Involving Large Developers Should Be Made.

At minimum, indicators of quid pro quo corruption or its appearance should be identified to justify the contribution prohibitions under consideration. Case law suggests that examples might be drawn from developer violations of campaign finance laws.³¹ However, evidence of actual or perceived and quid pro quo corruption involving large developers in the City of Los Angeles will provide the best support for the proposed ban, and the best defense against possible legal challenges.³²

If you have questions or comments regarding any of the issues discussed above, please contact us at your convenience.

³¹ (See generally *Yamada v. Weaver*, 872 F. Supp. 2d at 1058, 1058 n. 27 (noting that Hawaii government contractor contribution prohibition arose in part because of apparent corruption involving “campaign finance scandals”).

³² For example, researchers from the USC School of Policy Planning and Development produced a report directed to the LA City Ethics Commission entitled “Pay to Play in the City of Los Angeles: An Analysis of Campaign Contributions and the Awarding of Government Contracts.” (See http://priceschool.usc.edu/files/enews/july11/Ethics_Briefer.pdf.)

[DRAFT] ORDINANCE No. _____

An ordinance amending the City's Campaign Finance Ordinance, codified in Chapter IV, Article 9.7 of the Los Angeles Municipal Code Section 49.7.1, *et seq.*, regarding the restriction of political contributions from persons with large development projects, and related requirements.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Section 1. A new Section 49.7.50, 49.7.51, and 49.7.52 is added to the Los Angeles Municipal Code to read as follows:

SEC. 49.7.50. DEVELOPER CONTRIBUTION RESTRICTIONS

A. Campaign Contribution Restrictions. The following persons shall not make a campaign contribution to the Mayor, members of the City Council, the City Attorney, or any candidate for the aforementioned elected City offices; or City controlled committee that is specifically controlled by the Mayor, members of the City Council or the City Attorney or any candidate for these elected City elected offices:

1. A person who submits an application for any Planning Entitlement Process as set forth in Section 49.7.51 of this code as administered by the Department of City Planning;
2. A person who has received a decision on an application for any Planning Entitlement Process set forth in Section 49.7.51 of this code, or a decision on any appeal of a denial of an application, for 12 months after any such decision on an application or appeal was heard and issued; and
3. Principals of persons defined in paragraphs A.1 and A.2. Such principals shall include:
 - (i) board chair; president; chief executive officer; chief financial officer; chief operating officer of a person; and any individual who serves in the functional equivalent of one or more of these positions;
 - (ii) An individual who holds an ownership interest in the person of 20 percent or more; and
 - (iii) An individual authorized to represent the person with any procedures in subsections A.1. and A.2.

B. Exceptions. This subdivision shall not apply to:

1. Contributions to the Mayor, members of the City Council, and City Attorney, or candidates or City controlled committees for these elected City offices where the

application for the Planning Entitlement Process as set forth in Section 49.7.51 of this code, is for a development project which creates or results in less than 4,000 gross square feet of residential floor area;

2. Contributions to the Mayor, members of the City Council, and City Attorney, or candidates or City controlled committees for these elected City offices where the application for a Planning Entitlement Process as set forth in Section 49.7.51 of this code is for a development project which creates or results in less than 15,000 gross square feet of commercial floor area;

C. Disclosure Form. Every person who submits an application for any Planning Entitlement Process set forth in Section 49.7.51 shall file a form with the Department of City Planning, at the time the application is submitted, that contains the following information and is submitted under oath:

1. A brief description of the specific Planning Entitlement Process application, including any City reference number associated with it;
2. The date the application for Planning Entitlement Process was submitted;
3. The name of the person who submits the application for Planning Entitlement Process;
4. The address of the person who submits the application for Planning Entitlement Process;
5. The phone number of the person who submits the application for Planning Entitlement Process;
6. The names and titles of the principals of the person who submits the application for Planning Entitlement Process; and
7. A certification that the person submitting the application understands, will comply with, and will notify its principals of the prohibitions and restrictions in this Section.

D. Requirement to Amend Form. If the information submitted pursuant to Subsection C changes after the application is submitted, the person who submits the application for Planning Entitlement Process shall amend the form and submit it to the Department of City Planning within ten (10) business days of the change.

1. The requirement to amend the form applies whenever the prohibitions and restrictions in this Section apply to the person, including after the person receives a decision on an application for any Planning Entitlement Process.

2. The Department of City Planning shall electronically submit the form to the Ethics Commission, in a Portable Document Format (PDF) or other electronic format pre-approved by the Ethics Commission, within ten (10) business days of receipt.

E. Notification by Department of City Planning. The Department of City Planning shall notify every person who submits an application for any Planning Entitlement Process set forth in Section 49.7.51 of the prohibitions set forth in Section 49.7.50(A).

Violations

- F. Enforcement of violations of this section shall proceed as set forth in Section 49.7.38 of this Code.
- G. In addition to any other penalties or remedies established by this Article, a person who is found to have violated or who has aided and abetted a violation of this Section shall have their application for a Planning Entitlement Process deemed void and the person may not file a new application for a period of six (6) months.
- H. The Ethics Commission staff shall notify all relevant agencies, departments, board and offices of a determination of violation within ten (10) business days of the determination.

SEC. 49.7.51. PLANNING ENTITLEMENT PROCESSES THAT TRIGGER DEVELOPER POLITICAL CONTRIBUTION RESTRICTIONS.

A. Definition of "Planning Entitlement Process". For the purposes set forth in Section 49.7.50, the term "Planning Entitlement Process" shall mean utilization of any of the planning processes enumerated in Subsection (B) of this Section that are administered by the Department of City Planning and for which approvals and appeals processes are rendered by one or more of the following: a duly authorized hearing officer, area planning commission, city planning commission, the City Council, or Mayor.

B. Specific Planning Entitlement Processes.

Land Use Legislative Actions (zone changes, specific plans etc.)

Zone and height district changes - Code Section - 12.32 F

Changes to the zoning code – Code section 12.32

Establishment, change or removal of a Supplemental Use District (S, G, RPD, CA, POD, MU, CDO, FH, K and O Districts) – Code Section 12.32 S

Establishment, change or removal of a Historic Preservation Overlay Zone – Code Section 12.20.3

Establishment, change or removal of Building Line – Code Section 12.32. R

City owned Designated Building Site for Historic Structures – Code Section Ord. No 159,802

Establishment and amendment of Specific Plans – Code Section 11.5.7

General Plan (Elements and Community Plan Changes and Amendments)

Establishment or amendment of the General Plan Elements and Community Plans - Code Section 11.5.6

Community Plan Update for amendment of Community Plans - Code Section 11.5.6

Major Plan Review/Periodic Plan Review (projects with a Community Plan Amendment and Zone Change) - Code Section 11.5.8

City Planning Commission (Conditional Uses, Plan Approvals & Other Similar Quasi-Judicial Approvals)

Citywide Conditional Uses

Major development projects - Code Section 12.24 U 14

Vesting Conditional Use Permits (Applies only to CUPs listed in the Zoning Code) - Code Section 12.24 T

Airports or aircraft landing fields - Code Section 12.24 U 1

Auditoriums, stadiums, arenas and the like - Code Section 12.24 U 2

Correctional or penal institutions - Code Section 12.24 U 5

Educational institutions - Code Section 12.24 U 6

Golf courses - Code Section 12.24 U 8

Land reclamation projects - Code Section 12.24 U 13

Natural resources development - Code Section 12.24 U 17

Piers, jetties, man-made islands, floating installations - Code Section 12.24 U 20

Research and development centers - Code Section 12.24 U 23

Public schools, elementary and high (kindergarten through 12th grade); Private schools elementary and high (kindergarten through 12th grade) in the A, RE, RS, R1, RU, RZ, RMP, RW1, R2, RD, RW2, R3, C1, C1.5, or M Zones; Private schools [other than elementary or high (kindergarten through 12th grade) or nursery schools] in the A, R, CR, C1, or C1.5 Zones - Code Section 12.24 U 24

Hazardous waste treatment or storage facilities in the M2 and M3 Zones - Code Section 12.24 U 10

Hazardous waste disposal facilities in the M3 Zone - Code Section 12.24 U 11

Electric power generating plants - Code Section 12.24 U 7

Desalinization plants - Code Section 12.24 U 25

Recycling uses in various zones - Code Section 12.24 U 22

Onshore installations for oil drilling - Code Section 12.24 U 18

Wood and green waste recycling in the A1 and A2 Zones - Code Section 12.24 U 9

Hospitals or sanitariums in the A, R, CR, C4, CM, or M Zones and in the C1 or C1.5 Zones when not permitted by right - Code Section 12.24 U 12

Child care facilities or nursery schools in the A, RE, RS, R1, RU, RZ, RMP, RW, R2, R3, or RD Zones, and in the CM and M Zones when providing care for children of employees - Code Section 12.24 U 4

Child care facilities for no more than 50 children in the R3 Zone - Code Section 12.24 U 3

Various uses in the OS Zone - Code Section 12.24 U 19

Various uses in the PF Zone/ Joint public/private development in PF Zone - Code Section 12.24 U 21

Motion picture and television studios and related incidental uses that are located on a motion picture or television studio site, in the A, R, or C Zones when not permitted by right - Code Section 12.24 U 15

Land Use Determinations by Commission - Code Section 12.24.1

Conditional Use Plan Approvals - Code Section 12.24 J, L, M

Specific Plans - Phasing Programs - (does not require Mayor review)

Public Benefit Permit Process (Public Benefit Uses)

Cemeteries - Code Section 14.00 A1

Libraries, museums, fire or police stations of governmental enterprises - Code Section 14.00 A3

Public utilities and public service uses in the A, R, C or MR Zones - Code Section 14.00 A6

Mobilehome parks - Code Section 14.00 A4

Recreational vehicle parks and mobilehome parks in the A, R or C Zones - Code Section 14.00 A7

Affordable housing development density increases (FAR - density bonus) - Code Section 14.00 A2

Parks, playgrounds or recreation or community centers in the A, R, or C1 Zones - Code Section 14.00 A5

Shelter for the homeless with no more than 30 beds in the R3, M1, M2 and M3 Zones - Code Section 14.00 A8

Shelter for the homeless in no more than 6 trailers by a church, religious institution, or philanthropic institution - Code Section 14.00 A9

Zoning Administrator (Conditional Uses, Plan Approvals & Other Similar Quasi-Judicial Approvals)

Local Community Conditional Uses

Miniature or pitch and putt golf courses in the A, R, or C1 Zones - Code Section 12.24 W 26

Mortuaries or funeral parlors in the C2, C4, C5, CM, or M1 Zones - Code Section 12.24 W 29

Nurseries in the R, C1 and C1.5 Zones - Code Section 12.24 W 31

Private clubs in the A, R1, RU, RZ, RMP, RW1, R2, RD, RW2, R3, or R4 Zones - Code Section 12.24 W 35

Second dwellings on large lots in the RA, RS, or R1 Zones - Code Section 12.24 W 44

Wireless telecommunication facilities in the A, R, C, or MR Zones - Code Section 12.24 W 49

Hotels and motels under various conditions in various zones - Code Section 12.24 W 24

Second dwelling unit in the A, RA, RE, RS, R1, RMP, or RW1 Zones - Code Section 12.24 W 43

Automobile service stations, tire repairing, battery servicing, or automobile lubrication in the C1.5 Zone - Code Section 12.24 W 2

Sale of merchandise in the open or at an indoor swap meet under various conditions and in various zones - Code Section 12.24 W 42

Automobile service stations, tire repairing, battery servicing, and automobile lubrication in the C4 Zone - Code Section 12.24 W 3

Bovine feed or sales yards in the A1 or A2 Zones - Code Section 12.24 W 5

Rental or storage of household moving rental trucks and utility rental trailers in the C2, C5, CM and MR1 Zones - Code Section 12.24 W 39

Entertainment uses - dance halls, hostess dance halls and massage parlors in various zones - Code Section 12.24 W 18

Penny arcades in the C2, C5, CM, M1, M2, or M3 Zones - Code Section 12.24 W 34

Sale of alcoholic beverages for off-site consumption in the C and M Zones - Code Section 12.24 W 1

Alcoholic Beverage Sales in the South Central Specific Plan Area - Ord. No 171,681

Nightclubs in Westwood Village - Code Section 12.24 W 30

Automotive repair in the C2, C5, CM and M1 Zones within 300 feet of an A or R Zone - Code Section 12.24 W 4

Sale of firearms or ammunition in the C1, C1.5, C2, C4, C5, CM, M1, M2, and M3 Zones - Code Section 12.24 W 41

Churches in the A, RE, RS, R1, RU, RZ, RMP, RW1, R2, RD, RW2, R3, C1, C1.5, CM, or M Zones - Code Section 12.24 W 9

Fraternity or sorority houses in the A, R1, RU, RZ, RMP, RW1, R2, RD, RW2, or R3 Zones - Code Section 12.24 W 21

Mini-shopping centers and commercial corner developments in the C, M1, M2, or M3 Zones where use does not comply with Sec. 12.22 requirements - Code Section 12.24 W 27

Outdoor eating areas for ground floor restaurants in the CR, C1, and C1.5 Zones when not permitted by right - Code Section 12.24 W 32

Floor area ratio averaging in unified developments - Code Section 12.24 W 19

Drive-through fast food establishments in all C Zones except the CR Zone when located close to a residential zone or use - Code Section 12.24 W 17

Pawnshops in the C2, C5, CM, M1, M2, and M3 Zones - Code Section 12.24 W 33

Restaurants for the use of the general public in the MR1 and MR2 Zones - Code Section 12.24 W 40

Other ZA/Local Actions

Vesting Conditional Use Permits (Applies only to CUPs listed in the Zoning Code) - Code Section 12.24 T

Conditional Use Plan Approvals - Code Section 12.24 J, L, M

Slight Modifications - Code Section 12.28

Adjustments to Yard, Area, Height and Building Line requirements - Code Section 12.28

Plan Approvals - variances - Code Section 12.27 U

Zoning Administration Interpretations (Yards/ Hillside) - Code Section 12.21 A 2

Foster Care Homes - Code Section 12.24 X 9

Dwellings Adjacent to Equinekeeping Uses - Code Section 12.24 X 5

Fences not to exceed 8 ft. in height in the required front, side, or rear yard in the A and R Zones - Code Section 12.24 X 7

Fences not to exceed 6 ft. in height in the front yards within groups of lots - Code Section 12.24 X 8

Standards for tennis courts in the A and R Zones - Code Section 12.21 C 4

Certified farmers' markets - Code Section 12.24 X 6

To permit an automotive repair business existing prior to 12/31/98 to utilize front portion of lot for open storage - Code Section 12.24 X 4

To permit a restaurant, seating no more than 50 persons, to serve alcoholic beverages - Code Section 12.24 X 2

To permit buildings in the A1, A2, RA, RE, RS, R1, and RD Zones which are located in a Hillside Area to exceed various height, yard, area, and parking requirements - Code Section 12.24 X 11

To permit buildings on lots in the A1, A2, RA, RE, RS, R1, and RD Zones which are located on a Substandard Hillside Limited Street - Code Section 12.24 X 21

Joint living and work quarters for artists and artisans in commercial and industrial buildings in the CR, CM, MR1, M1, MR2, M2 and M3 Zones, and such quarters with reduced parking in the C1, C1.5, C2, C4, and C5 Zones - Code Section 12.24 X 13

To permit buildings on a lot in the RA, RE20, RE15, RE11, RE9, RS, R1, and R2 Zones where the lot is not located in a Hillside Area or Coastal Zone to exceed the maximum height or stories permitted, or to reduce the required side yards - Code Section 12.24 X 10

Historic buildings - Code Section 12.24 X 12

To permit Adaptive Reuse Projects in the M Zones in the Downtown Project Area pursuant to Sec. 12.22 A 28 - Code Section 12.24 X 1

Parking Requirements for Commercial or Industrial Uses with Parking Management Alternatives in C or M Zones - Code Section 12.24 X 17

To permit uses which support motion picture and television production and other entertainment industries - Code Section 12.24 X 23

Continuation of Nonconforming Buildings and Uses - Code Section 12.23 A 6

Coastal Permits - Pre-Certification - Code Section 12.20.2

Coastal Permits - Post Certification - Code Section 12.20.2.1

Supplemental Use Districts

G - Surface Mining Districts Permit for Surface Mining Operations within established districts - Code Section 13.03 D5

O - Oil Districts (methods/conditions of operation) - Code Section 13.01

Other Actions (Building and Safety Appeals)

Other ZA / Local Actions

Appeal from Building Department Orders - Code Section 12.26 K

Other Actions (Revocations & Nuisance Use Abatement)

Variances - Code Section 12.27

Area Planning Commission (Conditional Uses, Plan Approvals, Specific Plan Exceptions & Other Similar Quasi-Judicial Approvals)

Specific Plans

Exception from Geographically Specific Plan - Code Section 11.5.7 F

Local Community Conditional Uses - 6

Mixed commercial / residential development - Code Section 12.24 V2

Buildings over 6 stories in the Wilshire - Westwood Scenic Corridor - Code Section 12.24 V1

Conditional Use Plan Approvals - Code Section 12.24 J, L, M

Vesting Conditional Use Permits (Applies only to CPUs listed in the Zoning Code) - Code Section 12.24 T

Other ZA / Local Actions

Transfer of Development Rights - Central Business District Redevelopment Project Area
Code Section 14.5.1 - 14.5.8

Director of Planning Approvals (Site Plan Review & Design Review)

Director's Authority

Site Plan Review - Code Section 16.05

Director's Determination on Open Space Requirements for 6 or more Residential Units - Code Section 12.21 G3

Zone Boundary Adjustments C or M and P or PB Adjustments - Code Section 12.30 H, 12.30 K

Private Streets - Code Section 18.00 - 18.12

To permit a reduction in the required parking spaces for a commercial or industrial building when located within 1,500 feet of a transit or bus station - Code Section 12.24 Y

Design Review - specific plans - Code Section 16.50 E3

Historic Preservation Zone (Certificate of Appropriateness) Director or APC/APC or CCL) - Code Section 12.20.3

Supplemental Use Districts

CA - Commercial and Artcraft Districts Alternate procedures for waiver of public hearing - Code Section 13.06 E3

POD - Pedestrian Oriented Districts For projects that cannot meet development standards - Code Section 13.07

CDO - Community Design Overlay Districts Plan Approvals - Code Section 13.08 E

Specific Plans

Specific Plan Project Permit Compliance - Code Section 11.5.7 C

Modification of Specific Plan Project Permit Compliance - Code Section 11.5.7 D

Specific Plan Project Permit Adjustment - Code Section 11.5.7 E

Director of Planning Approvals

Director's Authority

Amendments of the "T: Classification and Clarifications of "Q" Classification, or "D" Limitation - Code Section 12.32 H

Subdivision of Land (Above Threshold)

Director's Authority

Any development project (tract or parcel map) which creates or results in 50,000 or more gross square feet of nonresidential floor area (current site plan review standard), or

Any development project (tract or parcel map) which creates or results in 50 or more dwelling units or guest rooms or combination thereof (site plan review standard), or

Any application without a proposed project description having less than 65,000 square feet of lot area (mini-shopping center standard).

Advisory Agency Authority

Tract Maps - Code Section 17.01 - 17.13

Parcel Maps - Code Section 17.50 - 17.58

Condo Conversion Projects - residential & residential to commercial / industrial - Code Section 12.95.2

Condo Conversion Projects - commercial / industrial & commercial / industrial to residential - Code Section 12.95.3

Modification of Recorded Final Maps - Code Section 17.14

Vesting Tentative Maps - Code Section 17.15

Reversion to Acreage - Code Section 17.10 A

SEC. 49.7.52. CITY COUNCIL MAY ADOPT ADDITIONAL REGULATIONS AND AMEND SECTIONS 49.7.50 AND 49.7.51 AS NECESSARY

The City Council may adopt amendments to Sections 49.7.50 and 49.7.51 and such other ordinances and additional regulations that are necessary to carry out the purposes of the ordinance enacting Sections 49.7.50 and 49.7.51.



APPLICATIONS:

DEPARTMENT OF CITY PLANNING APPLICATION

THIS BOX FOR CITY PLANNING STAFF USE ONLY

Case Number _____

Env. Case Number _____

Application Type _____

Case Filed With (Print Name) _____ Date Filed _____

Application includes letter requesting:

- Waived hearing
 - Concurrent hearing
 - Hearing not be scheduled on a specific date (e.g. vacation hold)
- Related Case Number _____

Provide all information requested. Missing, incomplete or inconsistent information will cause delays.

All terms in this document are applicable to the singular as well as the plural forms of such terms.

Detailed filing instructions are found on form CP-7810

1. PROJECT LOCATION

Street Address¹ _____ Unit/Space Number _____

Legal Description² (Lot, Block, Tract) _____

Assessor Parcel Number _____ Total Lot Area _____

2. PROJECT DESCRIPTION

Present Use _____

Proposed Use _____

Project Name (if applicable) _____

Describe in detail the characteristics, scope and/or operation of the proposed project _____

Additional information attached YES NO

Complete and check all that apply:

Existing Site Conditions

- Site is undeveloped or unimproved (i.e. vacant)
- Site is located within 500 feet of a freeway or railroad
- Site has existing buildings (provide copies of building permits)
- Site is located within 500 feet of a sensitive use (e.g. school, park)

¹ Street Addresses must include all addresses on the subject/application site (as identified in ZIMAS—<http://zimas.lacity.org>)

² Legal Description must include all contiguously owned properties (even if they are not a part of the proposed project site)

Site is/was developed with use that could release hazardous materials on soil and/or groundwater (e.g. dry cleaning, gas station, auto repair, industrial)

Site has special designation (e.g. National Historic Register, Survey LA)

Proposed Project Information

(Check all that apply or could apply)

- Demolition of existing buildings/structures
- Relocation of existing buildings/structures
- Interior tenant improvement
- Additions to existing buildings
- Grading
- Removal of any on-site tree
- Removal of any street tree

- Removal of protected trees on site or in the public right of way
- New construction: _____ square feet
- Accessory use (fence, sign, wireless, carport, etc.)
- Exterior renovation or alteration
- Change of use and/or hours of operation
- Haul Route
- Uses or structures in public right-of-way
- Phased project

Housing Component Information

Number of Residential Units: Existing _____ - Demolish(ed)³ _____ + Adding _____ = Total _____

Number of Affordable Units⁴ Existing _____ - Demolish(ed) _____ + Adding _____ = Total _____

Number of Market Rate Units Existing _____ - Demolish(ed) _____ + Adding _____ = Total _____

Mixed Use Projects, Amount of Non-Residential Floor Area: _____ square feet

Public Right-of-Way Information

Have you submitted the Planning Case Referral Form to BOE? (required) YES NO

Is your project required to dedicate land to the public right-of-way? YES NO

If so, what is/are your dedication requirement(s)? _____ ft.

If you have dedication requirements on multiple streets, please indicate: _____

3. ACTION(S) REQUESTED

Provide the Los Angeles Municipal Code (LAMC) Section that authorizes the request and (if applicable) the LAMC Section or the Specific Plan/Overlay Section from which relief is sought; follow with a description of the requested action.

Does the project include Multiple Approval Requests per LAMC 12.36? YES NO

Authorizing Code Section _____

Code Section from which relief is requested (if any): _____

Action Requested, Narrative: _____

Authorizing Code Section _____

Code Section from which relief is requested (if any): _____

Action Requested, Narrative: _____

Additional Requests Attached YES NO

³ Number of units to be demolished and/or which have been demolished within the last five (5) years.

⁴ As determined by the Housing and Community Investment Department

4. RELATED DEPARTMENT OF CITY PLANNING CASES

Are there previous or pending cases/decisions/environmental clearances on the project site? YES NO

If YES, list all case number(s) _____

If the application/project is directly related to one of the above cases, list the pertinent case numbers below and complete/check all that apply (provide copy).

Case No. _____ Ordinance No.: _____

- Condition compliance review
- Clarification of Q (Qualified) classification
- Modification of conditions
- Clarification of D (Development Limitations) classification
- Revision of approved plans
- Amendment to T (Tentative) classification
- Renewal of entitlement
- Plan Approval subsequent to Master Conditional Use

For purposes of environmental (CEQA) analysis, is there intent to develop a larger project? YES NO

Have you filed, or is there intent to file, a Subdivision with this project? YES NO

If YES, to either of the above, describe the other parts of the projects or the larger project below, whether or not currently filed with the City:

5. RELATED DOCUMENTS / REFERRALS

To help assigned staff coordinate with other Departments that may have a role in the proposed project, please provide a copy of any applicable form and reference number if known.

- a. Specialized Requirement Form _____
- b. Geographic Project Planning Referral _____
- c. Citywide Urban Design Guidelines Checklist _____
- d. Affordable Housing Referral Form _____
- e. Mello Form _____
- f. Unpermitted Dwelling Unit (UDU) Inter-Agency Referral Form _____
- g. HPOZ Authorization Form _____
- h. Management Team Authorization _____
- i. Expedite Fee Agreement _____
- j. Department of Transportation (DOT) Referral Form _____
- k. Bureau of Engineering (BOE) Planning Case Referral Form (PCRF) _____
- l. Order to Comply _____
- m. Building Permits and Certificates of Occupancy _____
- n. Hillside Referral Form _____
- o. Low Impact Development (LID) Referral Form (Storm water Mitigation) _____
- p. Proof of Filing with the Housing and Community Investment Department _____
- q. Are there any recorded Covenants, affidavits or easements on this property? YES (provide copy) NO

PROJECT TEAM INFORMATION (Complete all applicable fields)

Applicant⁵ name _____

Company/Firm _____

Address: _____ Unit/Space Number _____

City _____ State _____ Zip Code: _____

Telephone _____ E-mail: _____

Are you in escrow to purchase the subject property? YES NO

Property Owner of Record Same as applicant Different from applicant

Name (if different from applicant) _____

Address _____ Unit/Space Number _____

City _____ State _____ Zip Code: _____

Telephone _____ E-mail: _____

Agent/Representative name _____

Company/Firm _____

Address: _____ Unit/Space Number _____

City _____ State _____ Zip: _____

Telephone _____ E-mail: _____

Other (Specify Architect, Engineer, CEQA Consultant etc.) _____

Name _____

Company/Firm _____

Address: _____ Unit/Space Number _____

City _____ State _____ Zip Code: _____

Telephone _____ E-mail: _____

Primary Contact for Project Information Owner Applicant
(*select only one*) Agent/Representative Other

To ensure notification of any public hearing as well as decisions on the project, make sure to include an individual mailing label for each member of the project team in both the Property Owners List, and the Abutting Property Owners List.

⁵ An applicant is a person with a lasting interest in the completed project such as the property owner or a lessee/user of a project. An applicant is not someone filing the case on behalf of a client (i.e. usually not the agent/representative).

PROPERTY OWNER

7. PROPERTY OWNER AFFIDAVIT. Before the application can be accepted, the owner of each property involved must provide a notarized signature to verify the application is being filed with their knowledge. Staff will confirm ownership based on the records of the City Engineer or County Assessor. In the case of partnerships, corporations, LLCs or trusts the agent for service of process or an officer of the ownership entity so authorized may sign as stipulated below.

- **Ownership Disclosure.** If the property is owned by a partnership, corporation, LLC or trust, a disclosure identifying the agent for service or process or an officer of the ownership entity must be submitted. The disclosure must list the names and addresses of the principal owners (25% interest or greater). The signatory must appear in this list of names. A letter of authorization, as described below, may be submitted provided the signatory of the letter is included in the Ownership Disclosure. Include a copy of the current partnership agreement, corporate articles, or trust document as applicable.
- **Letter of Authorization (LOA).** A LOA from a property owner granting someone else permission to sign the application form may be provided if the property is owned by a partnership, corporation, LLC or trust or in rare circumstances when an individual property owner is unable to sign the application form. To be considered for acceptance, the LOA must indicate the name of the person being authorized the file, their relationship to the owner or project, the site address, a general description of the type of application being filed and must also include the language in items A-D below. In the case of partnerships, corporations, LLCs or trusts the LOA must be signed and notarized by the authorized signatory as shown on the Ownership Disclosure or in the case of private ownership by the property owner. Proof of Ownership for the signatory of the LOA must be submitted with said letter.
- **Grant Deed.** Provide a Copy of the Grant Deed If the ownership of the property does not match City Records and/or if the application is for a Coastal Development Permit. The Deed must correspond exactly with the ownership listed on the application.
- **Multiple Owners.** If the property is owned by more than one individual (e.g. John and Jane Doe or Mary Smith and Mark Jones) notarized signatures are required of all owners.

- a. I hereby certify that I am the owner of record of the herein previously described property located in the City of Los Angeles which is involved in this application or have been empowered to sign as the owner on behalf of a partnership, corporation, LLC or trust as evidenced by the documents attached hereto.
- b. I hereby consent to the filing of this application on my property for processing by the Department of City Planning.
- c. I understand if the application is approved, as a part of the process the City will apply conditions of approval which may be my responsibility to satisfy including, but not limited to, recording the decision and all conditions in the County Deed Records for the property.
- d. By my signature below, I declare under penalty of perjury under the laws of the State of California that the foregoing statements are true and correct.

*Property Owner's signatures must be signed/notarized in the presence of a Notary Public.
The City requires an original signature from the property owner with the "wet" notary stamp.
A Notary Acknowledgement is available for your convenience on following page.*

Signature _____

Date _____

Print Name _____

Signature _____

Date _____

Print Name _____

Space Below For Notary's Use

California All-Purpose Acknowledgement

Civil Code ' 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of _____

On _____ before me, _____
(Insert Name of Notary Public and Title)

personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf on which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature (Seal)

APPLICANT

- 8. APPLICANT DECLARATION.** A separate signature from the applicant, whether they are the property owner or not, attesting to the following, is required before the application can be accepted.
- a. I hereby certify that the information provided in this application, including plans and other attachments, is accurate and correct to the best of my knowledge. Furthermore, should the stated information be found false or insufficient to fulfill the requirements of the Department of City Planning, I agree to revise the information as appropriate.
 - b. I hereby certify that I have fully informed the City of the nature of the project for purposes of the California Environmental Quality Act (CEQA) and have not submitted this application with the intention of segmenting a larger project in violation of CEQA. I understand that should the City determine that the project is part of a larger project for purposes of CEQA, the City may revoke any approvals and/or stay any subsequent entitlements or permits (including certificates of occupancy) until a full and complete CEQA analysis is reviewed and appropriate CEQA clearance is adopted or certified.
 - c. I understand that the environmental review associated with this application is preliminary, and that after further evaluation, additional reports, studies, applications and/or fees may be required. .
 - d. I understand and agree that any report, study, map or other information submitted to the City in furtherance of this application will be treated by the City as public records which may be reviewed by any person and if requested, that a copy will be provided by the City to any person upon the payment of its direct costs of duplication.
 - e. I understand that the burden of proof to substantiate the request is the responsibility of the applicant. Additionally, I understand that planning staff are not permitted to assist the applicant or opponents of the project in preparing arguments for or against a request.
 - f. I understand that there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully evaluated and that the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions.
 - g. I understand that if this application is denied, there is no refund of fees paid.
 - i. I understand and agree to defend, indemnify, and hold harmless, the City, its officers, agents, employees, and volunteers (collectively "City), from any and all legal actions, claims, or proceedings (including administrative or alternative dispute resolution (collectively "actions"), arising out of any City process or approval prompted by this Action, either in whole or in part. Such actions include but are not limited to: actions to attack, set aside, void, or otherwise modify, an entitlement approval, environmental review, or subsequent permit decision; actions for personal or property damage; actions based on an allegation of an unlawful pattern and practice; inverse condemnation actions; and civil rights or an action based on the protected status of the petitioner or claimant under state or federal law (e.g. ADA or Unruh Act). I understand and agree to reimburse the City for any and all costs incurred in defense of such actions. This includes, but it not limited to, the payment of all court costs and attorneys' fees, all judgments or awards, damages, and settlement costs. The indemnity language in this paragraph is intended to be interpreted to the broadest extent permitted by law and shall be in addition to any other indemnification language agreed to by the applicant.
 - i. By my signature below, I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this application and any accompanying documents are true and correct, with full knowledge that all statements made in this application are subject to investigation and that any false or dishonest answer to any question may be grounds for denial or subsequent revocation of license or permit.

The City requires an original signature from the applicant. The applicant's signature below does not need to be notarized.

Signature: _____

Date: _____

Print Name: _____

**OPTIONAL
NEIGHBORHOOD CONTACT SHEET**

9. **SIGNATURES** of adjoining or neighboring property owners in support of the request are not required but are helpful, especially for projects in single-family residential areas. Signatures may be provided below (attach additional sheets if necessary).

NAME (PRINT)	SIGNATURE	ADDRESS	KEY # ON MAP

REVIEW of the project by the applicable Neighborhood Council is not required, but is helpful. If applicable, describe, below or separately, any contact you have had with the Neighborhood Council or other community groups, business associations and/or officials in the area surrounding the project site (attach additional sheets if necessary).



Application:

**ADMINISTRATIVE CLEARANCE FORM
Cornfield Arroyo Specific Plan (CASP)**

Case No. _____ Permit Application No. _____ Date Submitted: _____

Project Address: _____

List related or pending case numbers pertaining to this project _____

Fee: _____ Receipt # _____ Date of Receipt: _____

Project Planner: _____

Project Description:

Zone: _____ Total Project Size: _____

Assessor Parcel Number(s): _____ Community Plan: _____

Lot Area: _____ Project FAR: _____

Residential Square Footage _____ Non-Residential Square Footage: _____

Present Use: _____

Proposed Use(s): _____

Number of Residential units (if applicable): new _____; existing (to remain) _____;

existing (to demo) _____; Number of hotel rooms: (if applicable) _____;

Number of vehicle parking spaces: _____; Number of bicycle parking spaces: _____.

Will the Project include affordable housing? Yes / No

Will the Project utilize the Community Benefit Option? Yes / No

Will the Project utilize the TFAR Program? Yes / No

Project Type: Check all that are applicable

- Change of Use
- Addition
- Exterior Alteration
- Interior Alteration
- Demolition
- Signs
- Use of Land
- Eligible or Designated Historic Resource
- New Construction
- Pool/Spa

Application Materials:

These materials are in lieu of the *Master Application Instructions*. Please see CASP specialized requirements for details.

- ZIMAS Report
- Photographs (Aerial, Context)
- 1 Set of Full Size Plans
- 2 Sets of Reduced Size Plans
- 1 CD or Flash Drive with Plans
- Administrative Clearance Form Checklists: Check all that are applicable

- | | | |
|--|---|--|
| <input type="checkbox"/> 2.1 Zoning | <input type="checkbox"/> 2.5 Parking | <input type="checkbox"/> 2.9 Mitigations |
| <input type="checkbox"/> 2.2 Building Form | <input type="checkbox"/> 2.6 Conservation | <input type="checkbox"/> 3.1 Streets |
| <input type="checkbox"/> 2.3 Urban Design | <input type="checkbox"/> 2.7 Performances | |
| <input type="checkbox"/> 2.4 Open Space | <input type="checkbox"/> 2.8 Sign | |

Applicant Name: _____ Cell/Text: _____

Company: _____ E-Mail: _____

Addresses: _____

Project Contact: _____ Cell/Text: _____

Company: _____ E-Mail: _____

Addresses: _____

Recommended Changes

Bans on Non-individuals and Individual Developers

SEC. 49.7.16. CONTRIBUTOR INFORMATION.

(B)(3) The contribution is not from a person who is prohibited from contributing, including the following:

- a. A lobbyist or lobbying firm who is prohibited from contributing under Charter Section 470(c)(11); ~~and~~
- b. A bidder, sub-contractor, principal, or underwriting firm that is prohibited from contributing under Charter Section 470(c)(12) or Charter Section 609(e);
- c. An applicant or principal that is prohibited from contributing under Section 49.7.37; and
- d. A non-individual.

SEC. 49.7.35. BIDDER CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

(A)(7) **“Prohibited fundraising”** ~~means the following activities:~~ has the same meaning as in Section 49.7.11(A)(2).

- ~~a. Asking the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to make a contribution;~~
- ~~b. Inviting the bidder, sub-contractor, or an employee, officer or principal of the bidder or sub-contractor to a fundraising event;~~
- ~~c. Supplying the name of the bidder, sub-contractor, or an employee, officer or principal of the bidder or sub-contractor to be used for an invitation to a fundraising event;~~
- ~~d. Permitting one’s name to appear on a solicitation for contributions or an invitation to a fundraising event sent to the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor;~~
- ~~e. Providing the use of one’s home or business to hold a fundraising event if the bidder, sub-contractor or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~
- ~~f. Paying for at least 20 percent of the costs of a fundraising event if the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~

- ~~g. Hiring another person to conduct a fundraising event if the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~
- ~~h. Delivering a contribution, either in person or by mail, of the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to the elected City officer, candidate for elected City office, or an agent of the officer or candidate; or~~
- ~~i. Acting as an agent or intermediary in connection with the making of a contribution of the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to an elected City officer, a candidate for elected City office, or a City controlled committee.~~

SEC. 49.7.36. UNDERWRITER CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

(A)(1) “Prohibited Fundraising” ~~means the following activities:~~ has the same meaning as in Section 49.7.11(A)(2).

- ~~a. Asking the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to make a contribution;~~
- ~~b. Inviting the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to a fundraising event;~~
- ~~c. Supplying the name of the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to be used for an invitation to a fundraising event;~~
- ~~d. Permitting one’s name to appear on a solicitation for contributions or an invitation to a fundraising event sent to the underwriting firm, sub-contractor, or an employee or officer of one of those persons;~~
- ~~e. Providing the use of one’s home or business to hold a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~
- ~~f. Paying for at least 20 percent of the costs of a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~
- ~~g. Hiring another person to conduct a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~

- ~~h. Delivering a contribution, either in person or by mail, of the underwriting firm, sub-contractor, or to an employee, officer, or principal of the underwriting firm or sub-contractor to an elected City officer, a candidate for elected City office, or an agent of the officer or candidate; or~~
- ~~i. Acting as an agent or intermediary in connection with the making of a contribution by the underwriting firm, sub-contractor, or to an employee, officer, or principal of the underwriting firm or sub-contractor to an elected City officer, a candidate for elected City office, or a City controlled committee.~~

SEC. 49.7.37. CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

A. The following restrictions apply to non-individuals.

1. A non-individual may not make a contribution to or engage in prohibited fundraising or bundling for an elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate.
2. An elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate may not receive a contribution from a non-individual or from another person as a result of prohibited fundraising or bundling by a non-individual.

B. The following restrictions apply to individuals.

1. The following individuals may not make a contribution to or engage in prohibited fundraising or bundling for an elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate.

a. A lobbyist identified in, and in accordance with, Charter Section 470(c)(11).

b. A bidder, contractor, subcontractor, or principal identified in, and in accordance with, Section 49.7.35, Section 49.7.36, and Charter Section 470(c)(12).

c. An applicant or principal identified in Section 49.7.38.

(i) The restriction applies from the time an application or amendment is submitted until 12 months after the later of the date a letter of determination is issued or the date a certificate of occupancy is issued.

(ii) In addition to any other penalties or remedies established by this Article, a person found to have violated this Section may not be an applicant or principal on a new application for 12 months after the determination of violation. The Ethics Commission staff shall notify all

City agencies of a determination of violation within ten business days after the determination.

(iii) The definitions in Section 49.7.38(C) apply to this subparagraph.

2. Whenever the restrictions in Subsection B(1) apply, an elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate may not receive a contribution from an individual identified in Subsection B(1) or from another person as a result of prohibited fundraising or bundling by an individual identified in Subsection B(1).

C. For purposes of this section, the following terms have the following meanings.

1. "Bundling" means delivering a contribution or acting as an agent or intermediary in connection with the making of a contribution.
2. "Non-individual" means any business, organization, or entity other than a political party.
3. "Prohibited fundraising" has the same meaning as in Section 49.7.11(A)(2).

SEC. 49.7.38. DISCLOSURE IN PLANNING ENTITLEMENT PROCESSES

A. At the time an application for a land use entitlement is submitted, the applicant shall file information with the Planning Department.

1. The information shall include the following:

- a. A brief description of the development project, including any City reference number associated with it and the address or APN of the project site;
- b. The date the application was submitted;
- c. The applicant's name, address, phone number, and email address;
- d. The names and titles of all principals;
- e. A certification under penalty of perjury that the information submitted is true and complete and that the applicant understands, will comply with, and will notify all principals of the prohibitions in Section 49.7.37.

2. The information shall be filed through an electronic database created by the Ethics Commission. The City shall provide the Ethics Commission with adequate staffing and funding to create, maintain, and update the database and to administer this Section.

3. If the information filed pursuant to Paragraph 1 changes after the information is submitted, the applicant shall update its filing within ten business days after the

change. The requirement to amend applies as long as the restrictions in Subsection B apply.

4. An application may not be approved until the information required by this Section is filed.

B. The Planning Department shall notify every applicant of the requirements in this Section and the restrictions in Section 49.7.37.

C. For purposes of this section, the following terms have the following meanings.

1. "Application" means an application that is filed with the Planning Department and requires a discretionary decision. The term does not include an application that is purely administrative.

2. "Applicant" means a person who has submitted an application.

3. "Bundling" means delivering a contribution or acting as an agent or intermediary in connection with the making of a contribution.

4. "Discretionary decision" means an ultimate decision regarding an application that is rendered by the Director of Planning, a zoning administrator, an advisory agency, a deputy advisory agency, an historic preservation officer, an area planning commission, the City Planning Commission, the Cultural Heritage Commission, the City Council, or the Mayor.

5. "Planning Department" means the Los Angeles Department of City Planning.

6. "Principal" means the following:

a. An owner of the property site that is the subject of an application

b. A person with a substantial interest in an application or the related development project, including but not limited to an architect, an architectural firm, a lobbyist, a lobbying firm, an engineer, an engineering firm, an attorney, a law firm, a consultant, and any other member of the project team identified in the application form.

c. A subcontractor who is expected to receive at least \$100,000 as a result of performing work regarding an application or the related development project.

d. The board chair, president, chief executive officer, chief operating officer, and an individual who serves in the functional equivalent of one or more of those positions for a person identified in Subparagraph (a), (b), or (c);

e. An individual who holds an ownership interest of 20 percent or more in a person identified in Subparagraph (a), (b), or (c); and

f. An individual who is authorized to represent a person identified in Subparagraphs (a) through (e) before the Planning Department.

SEC. 49.7.~~3739~~. RECORDKEEPING.

SEC. 49.7.~~3840~~. ENFORCEMENT.

SEC. 49.7.~~3941~~. LATE FILING PENALTIES.

SEC. 49.7.~~4042~~. SEVERABILITY.

DRAFT

Recommended Changes
Bans on Individual and Non-individual Developers

SEC. 49.7.16. CONTRIBUTOR INFORMATION.

(B)(3) The contribution is not from a person who is prohibited from contributing, including the following:

- a. A lobbyist or lobbying firm who is prohibited from contributing under Charter Section 470(c)(11); ~~and~~
- b. A bidder, sub-contractor, principal, or underwriting firm that is prohibited from contributing under Charter Section 470(c)(12) or Charter Section 609(e); ~~and~~
- c. An applicant or principal that is prohibited from contributing under Section 49.7.37.

SEC. 49.7.35. BIDDER CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

(A)(7) ~~“Prohibited fundraising” means the following activities:~~ has the same meaning as in Section 49.7.11(A)(2).

- ~~a. Asking the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to make a contribution;~~
- ~~b. Inviting the bidder, sub-contractor, or an employee, officer or principal of the bidder or sub-contractor to a fundraising event;~~
- ~~c. Supplying the name of the bidder, sub-contractor, or an employee, officer or principal of the bidder or sub-contractor to be used for an invitation to a fundraising event;~~
- ~~d. Permitting one’s name to appear on a solicitation for contributions or an invitation to a fundraising event sent to the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor;~~
- ~~e. Providing the use of one’s home or business to hold a fundraising event if the bidder, sub-contractor or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~
- ~~f. Paying for at least 20 percent of the costs of a fundraising event if the bidder, sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~

- ~~g. Hiring another person to conduct a fundraising event if the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor attends the event;~~
- ~~h. Delivering a contribution, either in person or by mail, of the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to the elected City officer, candidate for elected City office, or an agent of the officer or candidate; or~~
- ~~i. Acting as an agent or intermediary in connection with the making of a contribution of the bidder, a sub-contractor, or an employee, officer, or principal of the bidder or sub-contractor to an elected City officer, a candidate for elected City office, or a City controlled committee.~~

SEC. 49.7.36. UNDERWRITER CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

(A)(1) “Prohibited Fundraising” ~~means the following activities:~~ has the same meaning as in Section 49.7.11(A)(2).

- ~~a. Asking the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to make a contribution;~~
- ~~b. Inviting the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to a fundraising event;~~
- ~~c. Supplying the name of the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor to be used for an invitation to a fundraising event;~~
- ~~d. Permitting one’s name to appear on a solicitation for contributions or an invitation to a fundraising event sent to the underwriting firm, sub-contractor, or an employee or officer of one of those persons;~~
- ~~e. Providing the use of one’s home or business to hold a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~
- ~~f. Paying for at least 20 percent of the costs of a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~
- ~~g. Hiring another person to conduct a fundraising event if the underwriting firm, sub-contractor, or an employee, officer, or principal of the underwriting firm or sub-contractor attends the event;~~

- ~~h. Delivering a contribution, either in person or by mail, of the underwriting firm, sub-contractor, or to an employee, officer, or principal of the underwriting firm or sub-contractor to an elected City officer, a candidate for elected City office, or an agent of the officer or candidate; or~~
- ~~i. Acting as an agent or intermediary in connection with the making of a contribution by the underwriting firm, sub-contractor, or to an or employee, officer, or principal of the underwriting firm or sub-contractor to an elected City officer, a candidate for elected City office, or a City controlled committee.~~

SEC. 49.7.37. DEVELOPER CONTRIBUTION AND FUNDRAISING RESTRICTIONS.

A. Definitions. The following definitions apply to this Section.

1. "Application" means an application that is filed with the Planning Department and requires a discretionary decision. The term does not include an application that is purely administrative.
2. "Applicant" means a person who has submitted an application.
3. "Bundling" means delivering a contribution or acting as an agent or intermediary in connection with the making of a contribution.
4. "Discretionary decision" means an ultimate decision regarding an application that is rendered by the Director of Planning, a zoning administrator, an advisory agency, a deputy advisory agency, an historic preservation officer, an area planning commission, the City Planning Commission, the Cultural Heritage Commission, the City Council, or the Mayor.
5. "Planning Department" means the Los Angeles Department of City Planning.
6. "Principal" means the following:
 - a. An owner of the property site that is the subject of an application
 - b. A person with a substantial interest in an application or the related development project, including but not limited to an architect, an architectural firm, a lobbyist, a lobbying firm, an engineer, an engineering firm, an attorney, a law firm, a consultant, and any other member of the project team identified in the application form.
 - c. A subcontractor who is expected to receive at least \$100,000 as a result of performing work regarding an application or the related development project.
 - d. The board chair, president, chief executive officer, chief operating officer, and an individual who serves in the functional equivalent of one or more of those positions for a person identified in Subparagraph (a), (b), or (c);

e. An individual who holds an ownership interest of 20 percent or more in a person identified in Subparagraph (a), (b), or (c); and

f. An individual who is authorized to represent a person identified in Subparagraphs (a) through (e) before the Planning Department.

7. "Prohibited fundraising" has the same meaning as in Section 49.7.11(A)(2).

B. Restrictions. From the date an application is submitted until 12 months after the later of the date a letter of determination is issued or the date a certificate of occupancy is issued, the following restrictions apply.

1. An applicant or principal may not make a contribution to or engage in prohibited fundraising or bundling for an elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate.

2. An elected City officer, a candidate for elected City office, or a committee controlled by an elected City officer or candidate may not receive a contribution from an applicant or principal or from another person as a result of prohibited fundraising or bundling by an applicant or principal.

C. Disclosure. At the time an application is submitted, the applicant shall file information with the Planning Department.

1. The information shall include the following:

a. A brief description of the development project, including any City reference number associated with it and the address or APN of the project site;

b. The date the application was submitted;

c. The applicant's name, address, phone number, and email address;

d. The names and titles of all principals;

e. A certification under penalty of perjury that the information submitted is true and complete and that the applicant understands, will comply with, and will notify all principals of the prohibitions and restrictions in this Section.

2. The information shall be filed through an electronic database created by the Ethics Commission. The City shall provide the Ethics Commission with adequate staffing and funding to create, maintain, and update the database and to administer this Section.

3. If the information filed pursuant to Paragraph 1 changes after the information is submitted, the applicant shall update its filing within ten business days after the

change. The requirement to amend applies as long as the restrictions in Subsection B apply.

4. An application may not be approved until the information required by this Section is filed.

D. Notification by Planning Department. The Planning Department shall notify every applicant of the requirements and restrictions in this Section.

E. Violations. In addition to any other penalties or remedies established by this Article, a person found to have violated this Section may not be an applicant or principal on a new application for 12 months after the determination of violation. The Ethics Commission staff shall notify all City agencies of a determination of violation within ten business days after the determination.

SEC. 49.7.3738. RECORDKEEPING.

SEC. 49.7.3839. ENFORCEMENT.

SEC. 49.7.3940. LATE FILING PENALTIES.

SEC. 49.7.4041. SEVERABILITY.

Behested Payment Report

A Public Document

Behested Payment Report

1. Elected Officer or CPUC Member <i>(Last name, First name)</i>		Date Stamp	California Form 803 For Official Use Only
Agency Name			
Agency Street Address			
Designated Contact Person <i>(Name and title, if different)</i>		<input type="checkbox"/> Amendment <i>(See Part 5)</i>	Date of Original Filing: _____ <i>(month, day, year)</i>
Area Code/Phone Number	E-mail <i>(Optional)</i>		

2. Payor Information *(For additional payors, include an attachment with the names and addresses.)*

Name _____

Address _____ City _____ State _____ Zip Code _____

3. Payee Information *(For additional payees, include an attachment with the names and addresses.)*

Name _____

Address _____ City _____ State _____ Zip Code _____

4. Payment Information *(Complete all information.)*

Date of Payment: _____ *(month, day, year)* Amount of Payment: *(In-Kind FMV)* \$ _____ *(Round to whole dollars.)*

Payment Type: Monetary Donation or In-Kind Goods or Services *(Provide description below.)*

Brief Description of In-Kind Payment: _____

Purpose: *(Check one and provide description below.)* Legislative Governmental Charitable

Describe the legislative, governmental, charitable purpose, or event: _____

5. Amendment Description and/or Comments

6. Verification

I certify, under penalty of perjury under the laws of the State of California, that to the best of my knowledge, the information contained herein is true and complete.

Executed on _____ DATE By _____ SIGNATURE OF ELECTED OFFICER OR CPUC MEMBER

Behested Payment Report

Form 803 is used by elected officers and members of the California Public Utilities Commission (CPUC) to disclose payments made at their behest, principally for legislative, governmental, or charitable purposes. This form was prepared by the Fair Political Practices Commission (FPPC) and is available at www.fppc.ca.gov.

When to File

File Form 803 within 30 days following the date on which the payment(s) meets or exceeds \$5,000 in the aggregate from a single source in a calendar year. (Section 84224.) Once a single source has made a behested payment of \$5,000 or more during the calendar year, subsequent payments of any amount from that source must be reported.

Where to File

State Officials: The official's state agency must receive Form 803 within 30 days of the date the behested payment is made. Within 30 days after receipt of the report, the state agency must forward a copy to the FPPC at:

1102 Q Street, Suite 3000, Sacramento, CA 95811
Fax: 916-322-0883 E-mail: Form803@fppc.ca.gov

Local Officials: The official's local agency must receive Form 803 within 30 days of the date the behested payment is made. Within 30 days after receipt of the report, the agency must forward a copy to the filing officer who receives the official's original campaign statements.

General Information: Behested payments are payments made principally for legislative, governmental, or charitable purposes under Government Code Section 82004.5. These payments are not for personal or campaign purposes. Generally, a donation is made at the behest if it is requested, solicited, or suggested by the official, or otherwise made to a person in cooperation, consultation, coordination with, or at the consent of, the elected officer or CPUC member. This also includes payments behested by the official's agent or employee on the official's behalf.

Exception: If the behested payment is made by a state, local, or federal government agency and is principally for legislative or governmental purposes, the payment does not have to be reported.

Privacy Information Notice: Information requested by the FPPC is required by and used to administer and enforce the Political Reform Act. Failure to provide information may be a violation subject to administrative, criminal, or civil penalties. All reports and statements are public records available for inspection and reproduction. If you have any questions, please contact the FPPC's General Counsel at 1102 Q Street, Suite 3000, Sacramento, CA 95811 or (916) 322-5660.

Instructions

Part 1 - Identification: Identify the official's name, agency, address, and contact information. Mark the amendment box if changing information on a previously filed Form 803 and include the date of the original filing.

Part 2 - Payor Information: Disclose the name and address of the person making the payment. A business address is acceptable.

Part 3 - Payee Information: Identify the name and address of the person receiving the payment. A business address is acceptable.

Part 4 - Payment Information: Disclose the payment date and amount using the fair market value (FMV) for donated in-kind goods or services. Check one box to identify the type of payment and provide a description if the payment is an in-kind good or service. Check one box to identify the purpose and provide a description.

Part 5 - Amendment Description or Comments: Complete this section if amending a previously filed Form 803 or to provide additional or clarifying information.

Part 6 - Verification: Date and sign the form under penalty of perjury.

Example

On April 24, 20XX, at CPUC Member Tully's request, the ABC Corporation made a monetary donation of \$5,000 to the Boys and Girls Club.

2. Payor Information <small>(For additional payors, include an attachment with the names and addresses.)</small>			
ABC Corporation			
Name			
1234 Alpha Ave.	Sacramento	CA	95814
Address	City	State	Zip Code
3. Payee Information <small>(For additional payees, include an attachment with the names and addresses.)</small>			
The Boys and Girls Club			
Name			
5678 Bravo Blvd.	Sacramento	CA	95814
Address	City	State	Zip Code
4. Payment Information <small>(Complete all information.)</small>			
Date of Payment:	April 24, 20XX	Amount of Payment: (in-Kind FMV) \$	5,000
	<small>(month, day, year)</small>		<small>(Round to whole dollars.)</small>
Payment Type:	<input checked="" type="checkbox"/> Monetary Donation or <input type="checkbox"/> In-Kind Goods or Services <small>(Provide description below.)</small>		
Brief Description of In-Kind Payment: _____			
Purpose: <small>(Check one and provide description below.)</small> <input type="checkbox"/> Legislative <input type="checkbox"/> Governmental <input checked="" type="checkbox"/> Charitable			
Describe the legislative, governmental, charitable purpose, or event: Donation to children's community service organization			

Recommended Changes
Restrictions on Behested Payments

SEC. 49.5.5. MISUSE OF CITY POSITION OR RESOURCES.

- A. City officials, agency employees, appointees awaiting confirmation by the City Council, and candidates for elected City office shall not misuse or attempt to misuse their positions or prospective positions to create or attempt to create a private advantage or disadvantage, financial or otherwise, for any person.
- B. City officials and agency employees shall not engage in political activity in the following scenarios:
 - 1. While on duty for the City.
 - 2. In any manner that implies the City official or agency employee is speaking on behalf of the City or communicating a City position. This may include but is not limited to engaging in political activity in the following scenarios:
 - a. While wearing a uniform or official City insignia; or
 - b. Using a City title or position.
 - 3. In a room or building that is owned by the City or primarily paid for or used by the City and occupied by a City official or agency employee in the discharge of City duties. This does not include a City room or building that is available to the public for organized campaign activities as long as the City official or agency employee does not use the room or building during the official's or employee's City working hours and does not use other City resources for the activity.
 - 4. Using City equipment, vehicle, supplies, or resources, including but not limited to mailing and distribution lists, electronic mail, and electronic data.

C. An elected City officer shall not solicit a behested payment from a restricted source.

1. The prohibition on soliciting a behested payment does not apply in the following scenarios:

- a. The solicitation is made because of a state of emergency declared by the City Council.**
- b. The solicitation is communicated broadly to the general public.**
- c. The solicitation is for services provided to the City.**

- d. The solicitation is made as a result of an elected official's participation in a grant application submitted on behalf of the City.
2. An elected City officer shall disclose behested payments in accordance with the Political Reform Act when one or more payments equal or exceed \$2,500 in the aggregate from the same source in the same calendar year.
3. When disclosing behested payments, an elected City officer shall identify in the comment section of the state's behested payment report whether the payor was a lobbying entity under Section 48.02; a bidder, contractor, subcontractor, or principal under Section 49.7.35 or 49.7.36; or an applicant or principal under Section 49.7.37[or 38].
4. A member of an elected City officer's staff is an agent of the elected City officer when the staff member solicits a behested payment.
- ~~GD.~~ A person shall not induce or coerce or attempt to induce or coerce another person to engage in activity prohibited by Subsections ~~A or~~ B, or C.
- ~~DE.~~ This Section does not prohibit the use of City resources to provide information to the public about the possible effects of a bond issue or ballot measure relating to City activities, operations, or policies when the use of public resources is otherwise legally authorized.



Tyler Joseph <tyler.joseph@lacity.org>

Fwd: February 19th meeting agenda item

David Tristan <david.tristan@lacity.org>
To: Tyler Joseph <tyler.joseph@lacity.org>

Thu, Feb 14, 2019 at 6:52 AM

----- Forwarded message -----

From: **Linda Lindley** [REDACTED]
Date: Wed, Feb 13, 2019 at 9:06 PM
Subject: February 19th meeting agenda item
To: <ethics.commission@lacity.org>

Good evening,

I am unable to attend the February 19th meeting where a discussion will take place regarding campaign finance reform. I support a lowering of the qualifying threshold for candidates to get public funds. I have attended sessions presented by representatives from cities who have successfully implemented publicly funded elections and it's truly the best thing that we can do to increase voter engagement and turnout, while encouraging candidates who have the best interests of their constituents to run for office.

I also support a ban on developers making donations.

These two issues are no-brainers for anyone who is serving on an ethics commission for the right reasons. I am a member of Represent Us L.A.-SGV.

Having your meetings after business hours would be another step toward ensuring full participation of community members and would allow the average Joe/Jane to consider running for an open position on your committee. Just saying.

Sincerely,
Linda Lindley

--
David Tristan
Deputy Executive Director
City Ethics Commission
City of Los Angeles
(213) 978-1983

This email is not formal advice and does not provide the associated protections. This email may contain confidential information that is protected from disclosure under City law. If you are not the intended recipient, please notify the sender and delete the message, and please do not forward or duplicate the message.

February 13, 2019

To: President Melinda Murray
Vice President Andrea Sheridan Ordin
Commissioner Araceli Campos
Commissioner Shedrick (Rick) Davis
Los Angeles City Ethics Commission

Cc: Executive Director Heather Holt
Deputy Executive Director David Tristan

Re: Policy Review on Developer Contributions and Matching Funds

Dear Honorable Members of the LA City Ethics Commission:

We would like to thank the commission for its continued focus on both improving our matching funds program and addressing the influence of developer contributions. We look forward to reviewing the upcoming report and providing additional comment at that time.

For now, we respectfully submit the following general recommendations:

1. **Developer Ban:** We strongly support a ban on developer contributions. The scope of coverage should be extensive, and extend well past the project's completion. For this policy to be effective it must include not only owners of the property, but include principals, employees, contractors, subcontractors, architects, and anyone else with a significant financial interest in the project.
2. **People Only Model:** The strongest anti-corruption package would include *both* a developer ban and a people only model in which corporations and LLCs are unable to directly contribute to candidates. This would offer administrative clarity, auditing clarity, and greater transparency for the public. In 2013 the voters of LA passed Proposition C with nearly 77% of Angelenos in support. This resolution demanded a constitutional amendment to overturn Citizens United and address corporate political spending. While that fight continues, there is nothing stopping the City from banning direct corporate contributions, just as the federal government does.
3. **Behested Payments:** There are many ways by which the undue influence of behested payments can be addressed. Developers, lobbyists, and major contractors must be banned from making behested payments. Furthermore, city officials and their immediate staff should be banned from soliciting

behested payments (aside from limited exemptions for emergency/disaster relief and efforts to address homelessness).

4. **\$11,400 Aggregate Threshold:** Our December 10th letter, signed by over 50 local, state, and national organizations, explains in detail why we strongly support Councilmember Bonin's motion to lower the aggregate threshold. Because of changes the City Council made to the reform package initially proposed by the Ethics Commission, candidates will need to secure a minimum of nearly 2x as many contributors to reach the threshold. CA Clean Money Campaign's report shows that this would have a severe impact on the number of candidates qualifying. We understand the Commission never intended to make it harder for candidates to qualify, and this amendment ensures the City adheres to the same standards that have been in place for nearly three decades.
5. **Debate Requirement:** The current debate requirement needs to be clarified to ensure that candidates do not try to game the system, and avoid participating in a real debate. The town hall option was introduced into the conversation as a way of preventing circumvention, not a means through which circumvention of the debate requirement would become routine. A town hall should only be available to candidates who have clearly made a good faith effort to secure a debate with their opponents.

Thank you for your consideration of this matter, we look forward to working with you on these important reforms.

Sincerely,

American Indian Movement SoCal
Bernie Sanders Brigade
California Clean Money Campaign
California Common Cause
Coalition to Preserve Los Angeles
Humanity First
LA Forward
League of Women Voters of Los Angeles
Me Too March International
Occupy ICE LA
Our Gov LA
Represent.Us, Los Angeles-San Gabriel Valley chapter
Unrig LA



Policy Review, Campaign Finance, Campaign Contributions, Public comment

1 message

Jill Stewart [REDACTED]
To: ethics.policy@lacity.org

Wed, Feb 13, 2019 at 2:54 PM

Please see my attached letter to the Ethics Commission. Thank you.

--

Jill Stewart
Coalition to Preserve LA



Feb. 13 Coalition to Preserve LA Letter to Ethics Commission.docx
75K



February 13, 2019

To: President Melinda Murray
Vice President Andrea Sheridan Ordin
Commissioner Araceli Campos
Commissioner Shedrick (Rick) Davis
Los Angeles City Ethics Commission
Cc: Executive Director Heather Holt
Deputy Executive Director David Tristan
Re: Policy Review on Developer Contributions and Matching Funds

Dear Honorable Members of the Los Angeles Ethics Commission:

Thank you for focusing on improving our outdated matching fund program and ways to reduce the influence of developer contributions. We look forward to your report and to making further comments.

We support the reform proposals submitted to you by a coalition including Unrig, LWV, California Clean Money, LA-SGV and others. We also ask that you consider the Temple City model to ban developer donations. From the moment a developer privately approaches an elected official to discuss exemptions for a project, developer donations and behests to city officials could be banned. Keeping with our belief that sunshine is the best disinfectant, private communications between elected officials, their staff, and the developers seeking exemptions, could also be banned.

As you pursue your work, we ask that you review Coalition to Preserve LA's 2017 study, a deep dive into several developments that were rewarded special exemptions or waivers from land-use rules, zoning, environmental assessment, Community Plans and/or the General Plan. We unearthed a system of closed meetings between the developer and the area's City Council Member or staff that often begin 1 or even 2 years before the public was informed.

In short, deals are discussed outside of the public light while campaign money flows to the Council Member and others. This process is fraught with a corrupting potential, and likely plays a role in the FBI probe. [We sent a 54-page complaint to the LA County Civil Grand Jury](#) to delve into pay-to-play, and support UN4LA's request that the DA investigate this process.

As we found in "Pay-to-Play in the City of L.A." ([study is pasted below or here](#)), private meetings between elected officials and developers unfold while developers are donating to the Council Member and electeds. When the project is misleadingly announced as a "new" proposal, the truth is, elected leaders and staff are often 1 or 2 years into making decisions about it. We can do better than this, and we truly appreciate your effort.

Sincerely,

Jill Stewart, Executive Director

Coalition to Preserve LA, 6500 Sunset Blvd., Los Angeles, CA 90028

Pay-to-Play in the City of Los Angeles

"Money Goes in, Favors Go Out, We All Pay. Who Do L.A. City Hall Leaders Work For?"

A Special Report and Timeline on Backroom Governing and Undue Developer Influence

Sourcing: All internal city facts were provided by the L.A. City Ethics Commission, or in documents released by City Council members as required by the California Public Records Act.

[This partially updated report was originally released by the Coalition to Preserve LA in March, 2017]

Summary: This special timeline of official city information reveals how city leaders work behind closed doors, on behalf of developers and usually without knowledge of the public, to get around an area's zoning rules and official plans. We found that most large developers donate to L.A. elected leaders throughout the backroom process.

This timeline shows that while non-transparent meetings and dinners between developers, elected city leaders and their staffs are common, elected leaders almost never meet with voters who find out about the proposals and question the plans.

The timeline is entirely made up of official city documents released under California Public Records Act, official campaign finance and lobbyist data from the L.A. City Ethics Commission, and news reports:

- **Dates and people present** at private backroom meetings between developers and city officials.
- **Donations received** by elected officials from these developers during that process.
- **City Council approval** of projects that badly bend L.A.'s development standards and zoning.

Nine Los Angeles City Council members were asked to divulge this public information. *All nine failed to release the subject of these backroom meetings with developers. They*

divulged only the fact that the meetings happened, in response to California Public Records Act requests by the Coalition.

The nine L.A. City Council members, of 15 on the City Council, were asked for their official appointment calendars because their Council Districts contain a significant number of projects that have been allowed to ignore city zoning and planning rules.

Some responded long after the 10-day deadline under the California Public Records Act (CPRA).

City Councilman Jose Huizar failed for months to provide his meeting calendar. He complied with California state law only after attorneys for the Coalition to Preserve LA demanded that he divulge this public information.

The official city data provides a direct look at the campaign and lobbying cash spent to influence City Hall leaders as they decide, in a non-transparent and money-influenced system, how and where L.A. and its neighborhoods should absorb large-scale developments.

Twelve Controversial L.A. Mega-developments: Who Attends Closed Meetings? How Politicians & Developers Benefit

1. Crossroads of the World: Developers Morton La Kretz and Harridge

This proposed triple skyscraper of luxury housing and 21 liquor licenses would displace a historic, diverse and thriving community of 84 multi-generational Latino, black and white families near Sunset Boulevard and Highland.

Behind closed doors in 2013, Harridge and La Kretz begin their quest for lucrative, major exemptions from city zoning rules and development standards, and to get an exemption from major state environmental impact protections.

March 21, 2013 Morton La Kretz, founder of Crossroads Management, donates \$1,300 to Eric Garcetti's campaign for mayor.

April 1, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$1,300 to Eric Garcetti's campaign for mayor.

April 5, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mitch O'Farrell's campaign for City Council.

April 8, 2013 Morton La Kretz, founder of Crossroads Management, donates \$700 to Mitch O'Farrell's campaign for City Council.

April 25, 2013

Bradley Woomer, the CFO at Harridge Development Group, LLC, donates \$250 to Mitch O'Farrell's campaign for City Council.

September 20, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mitch O'Farrell's campaign for City Council.

November 18, 2013 FIRST BACKROOM MEETING between Los Angeles City Councilmember Mitch O'Farrell, Morton La Kretz, and Linda Duttenthaler of Crossroads Management.

November 22, 2013 Bradley Woomer of Harridge Development Groups donates \$250 to Mitch O'Farrell's Officeholder Account.

November 22, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$500 to Mitch O'Farrell's Officeholder Account.

September 30, 2014

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Marqueece Harris-Dawson's campaign for City Council.

January 6, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gloria Molina's campaign for City Council.

January 27, 2015 Marc Annotti of Harridge Development Group donates \$700 to Mitch Englander's campaign for City Council.

February 12, 2015 Marc Annotti of Harridge Development Group donates \$700 to Nury Martinez's campaign for City Council.

March 26, 2015 Yuri Gurevich, a consultant at Harridge Development Group, donates \$250 to Carolyn Ramsay's campaign for City Council.

March 26, 2015 James D. Hearn, an attorney at Harridge Development Group, donates \$700 to Carolyn Ramsay's campaign for City Council.

March 26, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Carolyn Ramsay's campaign for City Council.

March 26, 2015 Bradley Woomer of Harridge Development Groups donates \$700 to Carolyn Ramsay's campaign for City Council.

April 20, 2015 SECOND BACKROOM MEETING with Councilmember Mitch O'Farrell, O'Farrell deputy Christine Peters, O'Farrell deputy Gary Benjamin and Crossroads attorney Jerry Neuman and Crossroads executive Linda Duttonhaver.

May 20, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$500 to Gil Cedillo's campaign for City Council.

May 29, 2015, more than two years AFTER cash donations began flowing from Harridge and La Kretz to O'Farrell and others, THE MEDIA LEARNS that a triple skyscraper is being proposed by Harridge Development Group and Mort La Kretz. Curbed LA breaks the "news" of this secret project that has been sailing along for two years in BACKROOM MEETINGS with City Councilman Mitch O'Farrell:

Curbed LA: "As these preliminary renderings show, the Crossroads complex—which is both a Los Angeles Historic-Cultural Monument and on the National Register of Historic Places—will be completely "restored to its glory," says Glenn Gritzner, a rep for developer Harridge Development Group. (Crossroads owner Mort La Kretz will continue to control the land the project sits on.) ...

"In addition to the reintroduction of retail at the Crossroads, the project will create eight new mixed-use buildings rising on parts of the two blocks between the complex and Highland Avenue to the west, and the block immediately to the north of the complex on Selma: a 308-room, 31-story hotel, a 32-story apartment tower, and a 30-story condo tower with 950 units total (including 70 units of designated affordable housing), 95,000 square feet of office space, and a total of 185,000 square feet of retail/commercial uses (including the 60,000 square feet at Crossroads). The shorter buildings range from two to six stories tall. (Curbed Los Angeles, May 29, 2015)

The money flowing from developers Harridge and La Kretz to City Hall elected leaders, and the BACKROOM MEETINGS with Council member Mitch O'Farrell, ratchet up at this point.

June 30, 2015: Marc Annotti of Harridge Development Group donates \$700 to Jose Huizar's Officeholder Account.

October 2015: Initial Environmental Impact Report (EIR) is released.

BACKROOM MEETING, November 2, 2015: Private meeting with O'Farrell Staff Christine Peters, O'Farrell deputy Chris Robertson, O'Farrell deputy Dan Halden with attorney Jerry Neuman.

BACKROOM MEETING November 10, 2015: Private meeting with O'Farrell Staff Chris Robertson, O'Farrell deputy Christine Peters, O'Farrell deputy Dan Halden with attorney Jerry Neuman.

November 12, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Bob Blumenfield's campaign for City Council.

November 14, 2015 Public scoping meeting held, finally **ALLOWING THE PUBLIC** to see the skyscraper multi-tower plan.

December 23, 2015 James Hearn, an attorney at Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

December 23, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

December 30, 2015 James Hearn, an attorney at Harridge Development Group, donates \$250 to Herb Wesson's Officeholder Account.

December 30, 2015 Bradley Woomeer of Harridge Development Groups donates \$700 to Curren Price's campaign for City Council.

December 30, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Curren Price's campaign for City Council.

December 31, 2015 James D. Hearn, general counsel at Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2015 Bradley Woomer of Harridge Development Groups donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

August 5, 2016 James Hearn, an attorney at Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

August 5, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Herb Wesson's campaign for City Council.

August 5, 2016 Bradley Woomer of Harridge Development Groups donates \$250 to Herb Wesson's campaign for City Council.

August 16, 2016 Harridge applies for "CEQA streamlining" to avoid complying with California Environmental Quality Act. Harridge also seeks Zone Change and Height District Change exemptions from the City Council to override the Community Plan and zoning in Hollywood.

August 26, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Joe Buscaino's campaign for City Council.

August 26, 2016 Bradley Woomer of Harridge Development Groups donates \$500 to Joe Buscaino's campaign for City Council.

BACKROOM MEETING September 26, 2016 between Councilmember O'Farrell, O'Farrell's deputy Amy Ablakat, O'Farrell's deputy Christine Peters, O'Farrell's deputy Dan Halden with Friends of Hollywood Central Park president Laurie Goldman, Harridge executive David Schwartzman, developer lobbyist Kyndra Casper

September 28, 2016 Marc Annotti of Harridge Development Group donates \$100 to Karo Torossian's campaign for City Council.

December 1, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2016 Gil Cedillo's campaign returns \$700 donation to David Schwartzman.

What Did the Crossroads Developers Get?

UPDATE, JAN. 2019: Harridge seeks — and L.A. elected and appointed officials agree — that the project should be rewarded a fast-track waiver around California's CEQA standards by calling the project an "Environmental Development Leadership Project."

In 2018, in comments tinged with racial overtones, Mayor Garcetti's appointees on the Planning Commission slam the mostly Latino community standing in the way of the skyscrapers. Garcetti Planning Commission appointee David Ambrose outrageously describes the beloved garden apartments as "rough" inside, and "not worth preserving," and Garcetti appointee Marc Mitchell dismisses this vibrant community as "dormant." The Planning Commission approves razing the community for three luxury skyscrapers.

On Tuesday Jan. 15, 2019, the Los Angeles City Council Planning and Land Use Management Committee -- missing two members who are now under investigation by the FBI -- votes unanimously to waive the many rules and standards Harridge sought to get around. PLUM Committee member Gil Cedillo, who repeatedly took campaign cash from the developers, slams a room jammed with opponents of the project as "hysteria."

The developer is awarded 22 liquor licenses, to turn a quiet community of working families and two schools into a Vegas-like scene of supergraphics, penthouses and bars. The project will destroy a community of 84 rent-protected homes, razing a core neighborhood of diversity and history in Hollywood.

The project goes next to final approval by the Los Angeles City Council, which is awash in donations from Harridge and La Kretz, the developers of the project.

2. Development name: 333 La Cienega, Developer Rick Caruso

This luxury tower would be 17 stories high, the tallest ever allowed in the Beverly Grove community at the intersection of San Vicente and La Cienega. Concerned Citizens of Beverly Hills/Beverly Grove sued the city for giving Caruso favorable treatment to override the zoning of the land.

May 15, 2012 Rick Caruso donates \$700 to Paul Koretz's campaign for City Council.

March 17, 2014 Rick Caruso donates \$500 to Paul Koretz's campaign for City Council.

July 10, 2014 BACKROOM MEETING between Councilmember Paul Koretz, Rick Caruso, Koretz's planning director Shawn Bayliss and Caruso vice-president Sam Garrison

November 3, 2014 BACKROOM MEETING between Councilmember Paul Koretz, Rick Caruso, planning director Shawn Bayliss and Caruso vice-president Sam Garrison

December 5, 2014 Rick Caruso donates \$500 to Paul Koretz's campaign for City Council.

February 26, 2016 Scoping meeting held for the public to view and comment on project.

September 12, 2016 BACKROOM MEETING between Councilmember Paul Koretz, Rick Caruso, planning director Shawn Bayliss and Caruso vice-president Sam Garrison

What Did Developer Rick Caruso Get?

November 10, 2016

Los Angeles Planning Commission recommends approval of project with a General Plan amendment and Height District Change by a unanimous 7-0-2 vote (two commissioners missing).

Then, weeks later on December 28, 2016, David Zahniser at the *Los Angeles Times* unveils a stream of donations flowing to city officials from Rick Caruso, his family and associates:

"Real estate developer Rick Caruso has been a reliable benefactor at Los Angeles City Hall, giving donations big and small to the city's politicians and their pet causes.

*"Caruso, known for the Grove and other shopping destinations, has donated to all but one of the city's 17 elected officials. **His charitable foundation provided \$125,000 to a nonprofit set up by Mayor Eric Garcetti.** ... Add in money from his employees and his family members, and **Caruso-affiliated donors have provided more than \$476,000 to the city's elected officials and their initiatives over the past five years.***

"Now, Caruso wants Garcetti and the council to approve a 20-story residential tower on La Cienega Boulevard, on a site where new buildings are currently limited to a height of 45 feet. Opponents of the project view Caruso's donations with alarm, saying the steady stream of contributions has undermined their confidence in the city's planning process.

"I'm sorry, but that's a lot of money," said Keith Nakata, a foe of the project who lives roughly five blocks from the site. "That is obviously something that the community cannot compete against." Caruso's residential tower is one of several real estate projects — some already approved, others still under consideration — to be reviewed at City Hall as six-figure contributions arrive from developers or donors with close ties to them. ([Los Angeles Times, December 28, 2016](#))

December 29, 2016 *Los Angeles Times* reports that City Councilman Paul Koretz pulled support of the La Cienega project. Koretz later backs it after Caruso makes modest modifications to his proposal.

"Los Angeles City Councilman Paul Koretz, under fire from an opponent in the March election, said Thursday that he has pulled his support for a controversial 20-story residential tower proposed near the Beverly Center. Koretz, standing on La Cienega Boulevard near the project site, said he now thinks the planned apartment building is "too tall" — and

wants real estate developer Rick Caruso to enter into additional talks with a homeowners group.

“I’m calling on Mr. Caruso to continue meeting with neighborhood representatives and to shrink the project until it is appropriate for the area,” said Koretz, who represents neighborhoods from the Westside north to Encino.

The announcement came a day after The Times reported that Caruso, his family members, his companies, his charity and his employees provided more than \$476,000 over the past five years to L.A. city politicians and their pet causes. ([Los Angeles Times, December 29, 2016](#))

What Did Developer Rick Caruso Get?

January 24, 2017

Los Angeles City Council approves the Caruso project including exemptions from L.A. zoning rules. Caruso is awarded a lucrative General Plan Amendment and a Height District Change by the LA City Council.

3. Koreatown Skyscraper, Developer Michael Hakim/Colony Holdings

This luxury 30-story skyscraper would displace a community of affordable housing in Koreatown. Two neighborhood groups sued to halt the city from approving this money-greased project.

July 14, 2006 Michael Hakim donated \$500 to Herb Wesson’s campaign for City Council.

August 1, 2007 Michael Hakim donated \$500 to Herb Wesson’s campaign for City Council.

October 8, 2009

Planning Commission recommends that City Council not adopt General Plan Amendments for this project because it is unsuitable for the area.

December 15, 2009 Department of City Planning disapproves of project, concurring with Planning Commission.

December 23, 2009 Mayor Villaraigosa agrees with the Planning Commission's disapproval of the skyscraper development plan.

February 12, 2010 Catalina Apartment is placed on the agenda for Los Angeles City Council's powerful Planning and Land Use Management Committee (PLUM) meeting on February 16, 2010.

February 16, 2010 through May 5, 2015 Catalina Apartments is "continued" at PLUM, holding the hotly disputed project in limbo.

December 15, 2010 Colony Holdings, LLC, operated by Michael Hakim, donated \$500 to Herb Wesson's campaign for City Council.

June 6, 2012 BACKROOM MEETING between City Councilmember Herb Wesson's deputy Andrew Westall, Wesson executive assistant Shawn Wallace, and Wesson deputy Elizabeth Carlin and the developer, Colony Holdings.

July 11, 2012 Wesson's office holds **BACKROOM MEETING** described in documents as being with "Planning" officials, regarding the Michael Hakim/Colony Holdings project.

What Did Developer Hakim Get?

January 30, 2013: The media reports that the skyscraper plan is being "revived," by city officials, this time 10 stories shorter and 23 units lighter.

CoStar News: "A developer is moving forward in an attempt to revive a proposed high-rise multifamily tower in the Wilshire District that was rejected by Los Angeles city planning officials in 2009.

Colony Holdings LLC, a group of investors headed by Mike Hakim, originally proposed a larger-scale 35-story mixed-use project with 270 units, ground retail and 663 parking spaces at a site on South Catalina Street south of W. 8th Street.

In late 2009, the Los Angeles Planning Commission rejected zoning changes for the project bounded by 805-833 South Catalina St., the 800 block of South Kenmore Avenue, and West 8th Street, concerned that the project was incompatible with the surrounding low- and mid-rise neighborhood of older homes and apartments.

The company re-submitted the project as a smaller 25-story, 227-unit tower, with 3,600 square feet of retail and 454 parking spaces, and a rooftop helipad, according to documents filed with the planning department. Colony Holdings officials outlined the project at the city Planning and Land Use Management Committee meeting on Jan. 29. ([CoStar News, January 30, 2013](#))

June 30, 2014 Colony Holdings, LLC, operated by Michael Hakim, donated \$700 to Herb Wesson's campaign for City Council.

December 17, 2014 Grand opening of another project, Onyx Tower, is attended by Herb Wesson by invitation of Michael Hakim.

May 18, 2015 According to the *Los Angeles Times*, during this period, developer Hakim gives \$1 million to the city's Affordable Housing Trust Fund, enough to build just 3 units of affordable housing. He also gives \$250,000 to a public trust fund controlled by Councilman Herb Wesson.

What Did the Developer Hakim Get?

April 15, 2015 Mayor Eric Garcetti issues a surprise letter to the Los Angeles City Council stating he disagrees with findings of the City Planning Commission against the skyscraper. In an exceedingly rare move, Garcetti overrides his political appointees on the Planning Commission, using his mayoral powers to approve a General Plan Amendment and Zone Change for Hakim's skyscraper.

Los Angeles Times reports: "But Mayor Eric Garcetti did something that surprised activists, housing advocates and planning wonks: He rejected a decision by a panel of his own appointees.

"Last month, Garcetti threw his support behind a controversial 27-story residential tower in Koreatown. He did so even though the people he put on the city Planning Commission unanimously rejected the apartment project, saying it would be too big for the surrounding neighborhood. On April 15, Garcetti notified the council he was disapproving his commissioners' decision.

"The mayor's action is the latest example of city leaders helping to boost the value of a piece of property via generous zoning changes or other deviations from city

planning rules. It also may signal how Garcetti, who hopes to add 100,000 housing units in the city by 2021, will approach other development projects enmeshed in controversy. ([Los Angeles Times, May 18, 2015](#))

June 15, 2015 Community Impact Statement submitted by Wilshire Center-Koreatown Neighborhood Council recommends that City Council not approve the project.

June 17, 2015 LA City Council, in a 10-0-5 vote (unanimous, with 5 missing council members), approves the General Plan Amendment and Zone Change for Hakim's skyscraper in Koreatown.

UPDATED, NOVEMBER 2018: Two community groups sue the City of Los Angeles over this backroom deal, and a judge agrees, overturning on April 13, 2018 the approvals of the City Council and Mayor Eric Garcetti.

The judge ordered an Environmental Impact Report. Mayor Garcetti had long insisted that NO environmental study was needed to put a skyscraper on a quiet, narrow, two-story, residential street.

4. Cumulus Skyscraper: Developers Carmel Partners of San Francisco

This 30-story luxury skyscraper, with a massive, multi-building, 10-story complex around its base is proposed by Carmel Partners at the former site of KABC Radio. The project, far bigger and taller than anything allowed in the region, is sued by Crenshaw Subway Coalition and Friends of the Neighborhood Integrity Initiative for violating the City Charter & California Environmental Quality Act.

November 3, 2014 BACKROOM MEETING between Councilmember Herb Wesson and Carmel Partners of San Francisco.

November 14, 2014 Michael Lahorgue, President of Carmel Partners, donates \$700 to Herb Wesson's campaign for City Council.

November 14, 2014 Christopher Bede, who works at Carmel Partners, donates \$700.

November 14, 2014 Ron Zeff, Managing Partner at Carmel Partners, donates \$700 to Herb Wesson's campaign for City Council.

December 23, 2014 Carmel Partners donates \$700 to Jose Huizar's campaign for City Council.

February 5, 2015 BACKROOM MEETING with Councilmember Herb Wesson, Carmel Partners vice- president Neils Cotter and Carmel Partners founder Ron Zeff at Morton's Steakhouse.

March 2015 Study published of the environmental impact of the Cumulus project.

December 15, 2015 Carmel Partners donates \$700 to Jose Huizar's campaign for City Council.

December 29, 2015 Carmel Partners donates \$700 to Curren Price's campaign for City Council.

December 31, 2015 Carmel Partners donates \$700 to Gil Cedillo's campaign for City Council.

January 25, 2016 BACKROOM MEETING with Councilmember Herb Wesson, his deputy Andrew Westall, his deputy Elizabeth Carlin, and Carmel Partners vice-president Neils Cotter.

April 4, 2016 L.A. Planning Commission, appointed by the mayor, issues a report on the development.

June 7, 2016 C

City Council approves a General Plan Amendment, Zoning Change and Height Change – lucrative exemptions from the rules, for the developer.

June 30, 2016 Nicholas Zaharow who works at Carmel Partners donates \$200 to Mitch O'Farrell's campaign for City Council.

June 30, 2016 Carmel Partners donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016 Carmel Partners donates \$700 to Joe Buscaino's campaign for City Council.

June 30, 2016 Nicholas Zaharov, who works at Carmel Partners, donates \$700 to Bob Blumenfield's campaign for City Council.

What Did the Developer Carmel Partners Get?

September 15, 2016 After the City Council approves the project, the financial transaction on the property is finalized. The deal, sweetened by the City Council's major exemptions from LA's zoning rules, closes for \$111 million.

5. The Reef Mega-Skyscraper: Developer Kanon Ventures

The Reef has been dubbed a Black Lung Loft, meaning freeway-adjacent housing where children are allowed to live, endangering their lungs for life. USC's seminal Children's Health Study has found that such buildings cause high levels of lifelong lung damage among children, and USC researchers have urged the City Council to reject such projects. <http://www.latimes.com/projects/la-me-freeway-pollution> and <http://www.laweekly.com/news/black-lung-lofts-2164048>.

May 3, 2013 Ava Bromberg, Kanon Ventures executive, donates \$1,300 to Eric Garcetti's campaign for mayor.

June 12, 2013 Ava Bromberg, Kanon Ventures executive, donates \$1,000 to Eric Garcetti's campaign for mayor.

June 4, 2014 *Los Angeles Times* Reports that Curren Price is "thrilled" about project coming to his City Council district.

"The neighborhood has the chance to evolve as a lower-cost alternative to downtown, where land costs are high, said Rob Katherman, head of planning and economic development for City Councilman Curren D. Price, who represents the 9th District where SoLA is proposed.

"Downtown has become very expensive. It's no cheaper to live downtown in an apartment than it is on the Westside," Katherman said. "I think this is a natural progression."

The development proposal still has to pass through an approval process expected to last about three years that would include multiple public hearings. "There

are certainly a lot of details that need to be worked out," Katherman said, "and they need to get the community and stakeholders onboard."

Still, the councilman's office is "thrilled" at the prospect of such substantial privately funded development in the area, he said. "This is a wonderful opportunity to show what the future of downtown is going to be as it migrates southward." ([Los Angeles Times, June 4, 2014](#))

July 15, 2014

BACKROOM MEETING between Councilmember Curren Price, Price's deputy Rob Katherman, Price's chief of staff Curtis Earnest, Price's deputy James Westbrooks, and Kanon Ventures executive Ava Bromberg, The Reef project attorney Edgar Khalatian, and Marathon Communications developer lobbyist Richard Lichtenstein.

August 18, 2014 BACKROOM MEETING

between Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy, and deputy James Westbrooks and Kanon Ventures executive Ava Bromberg.

October 7, 2014 BACKROOM MEETING

between Councilmember Curren Price, deputy Paloma Perez-McEvoy and Kanon Ventures executive Ava Bromberg, attorney Edgar Khalatian, Marathon Communications lobbyist Richard Lichtenstein and LA Economic and Workforce Development Department's Jenny Scanlin.

November 10, 2014 BACKROOM MEETING

between Curren Price's deputy Paloma Perez-McEvoy and Marathon Communications lobbyist Shelia Gonzaga and Kanon Ventures executive Ava Bromberg

March 31, 2015 Jon Vartan Hovsepian, managing director for Kanon Ventures, donates \$1,400 to Eric Garcetti's campaign for mayor.

April 14, 2015 BACKROOM MEETING

between Curren Price's deputy Paloma Perez-McEvoy and Rodolfo Monroy, Win Pham, Craig Bullock, Gregg Vandergriff, Planning Department's Martiza Przekop, Taimour Tanavoli, Los Angeles city employee Ammar Eltawil, L.A. fire inspector John Dallas and attorney Edgar Khalatian

June 30, 2015 Ava Bromberg donates \$250 to Eric Garcetti's campaign for mayor.

September 2015 Draft Environmental Impact Report is released.

December 17, 2015 BACKROOM MEETING

between Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and developer lobbyist Howard Sunkin.

June 8, 2016 BACKROOM MEETING with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and attorney Edgar Khalatian.

June 30, 2016 BACKROOM MEETING with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and attorney Edgar Khalatian, developer lobbyist Howard Sunkin, developer lobbyist from Marathon Communications Richard Lichtenstein, developer lobbyist from Marathon Communications Sheila Gonzaga and Kanon Ventures' Will Cipes.

July 27, 2016 BACKROOM MEETING with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and developer lobbyist Marathon Communications Richard Lichtenstein.

What Did the Developer Kanon Ventures Get?

August 11, 2016 Project approved at L.A. City Council Planning Committee meeting by a 5-3 vote.

November 22, 2016 Los Angeles City Council approves of Planning Committee report by a unanimous 12-0-3 vote (three council members absent).

Curbed LA reports: *"Controversial plans to build a massive housing, hotel, and retail project with a skyscraper on a parking lot in South LA was unanimously approved by the Los Angeles City Council Tuesday.*

"City leaders have said the development, called The Reef, has the potential to transform the neighborhood, which has been overlooked by developers until now. It may bring job opportunities and quality restaurants to a neglected area, but it has drawn fierce opposition over fears it will drive up living costs and displace thousands of residents.

Streetsblog LA offered this critique: *While it sounds like "livability wet dream" it "caters to a well-heeled clientele;" it is "situated on the edge of a neighborhood that is both one of the poorest in the city and the most overcrowded in the entire country."*

Los Angeles City Councilman Curren Price, who reps South LA, told the Los Angeles Times: "It is new ... and we have not seen this in the 9th District or South Los Angeles and there's certainly some uncertainty about it but definitely some excitement and enthusiasm." ([Curbed Los Angeles, November 22, 2016](#))

December 14, 2016: The final exemptions from the city's land-use and zoning rules are awarded by Los Angeles City Council, which approves a lucrative General Plan Amendment and Zone Change sought by the developer to exempt The Reef from L.A.'s zoning rules, and approves the development agreement, by a unanimous 12-0-3 vote (three council members are absent).

UPDATE, January 2019: The Reef investors never actually constructed the building, instead renaming the project and putting it up for sale on the global market. This "entitled" land -- now worth tens of millions of dollars more because City of Los Angeles approved upzoning and major exemptions from the rules -- is one of many unbuilt, land speculation examples in Los Angeles.

6. 8150 Sunset Tower Timeline: Developer Townscape Partners

This 300,000 square foot megadevelopment at the foot of Laurel Canyon on Sunset Boulevard was approved by the Los Angeles City Council under a process that did not recognize local height limits. The group Fix The City sued the project for violating environmental laws and LA Conservancy sued the City of Los Angeles for violating historic preservation laws to enrich the developer.

May 30, 2013

Townscape Management Inc donates \$1,000 to Eric Garcetti's campaign for mayor.

August 2, 2013

Townscape Management Inc donates \$500 to Paul Koretz's campaign for City Council.

June 26, 2014 John Irwin, an executive of Townscape Management Partners, donates \$700 to Carolyn Ramsay's campaign for City Council.

August 6, 2014 Townscape Management Inc donates \$1,000 to Eric Garcetti's Officeholder Account.

November 14, 2014 Townscape Management Inc donates \$700 to Herb Wesson's campaign for City Council.

February 25, 2015 John Irwin, an executive of Townscape Management Partners, donates \$500 to Jose Huizar's campaign for City Council. (Ramsay is Council member Tom LaBonge's chief of staff.)

March 26, 2015 Tyler Siegel, an executive of Townscape Management Partners, donates \$700 to Carolyn Ramsay's campaign for City Council.

December 26, 2015 Tyler Siegel of Townscape Partners donates \$500 to Mitch O'Farrell's campaign for City Council.

December 30, 2015 John Irwin, an executive of Townscape Management Partners, donates \$500 to Curren Price's campaign for City Council.

January 4, 2016 Mitch O'Farrell returns the \$500 contribution from Tyler Siegel.

January 20, 2016 BACKROOM MEETING with Council member David Ryu, Ryu's senior planning deputy Renee Weitzer and, Ryu's chief of staff Sarah Dusseault and Townscape lobbyist from Marathon Communications Richard Lichtenstein, Marathon Communications Gabe Kramer, Townscape founder Tyler Siegel, Townscape founder John Irwin, lobbyist Wendy Mitchell, Mok Wan and Annand Devarajan of Frank Gehry Parnters about EIR Comments and discuss outreach efforts and project process timeline.

June 17, 2016 Marathon Communication lobbyist Richard Lichtenstein has **BACKROOM MEETING** with Ryu chief of staff Sarah Dusseault and Ryu deputy Julia Duncan.

June 22, 2016 John Irwin, an executive of Townscape Management Partners, donates \$700 to Karo Torossian's campaign for City Council.

June 22, 2016 Tyler Siegel of Townscape Partners donates \$700 to Karo Torossian's campaign for City Council.

June 28, 2016 John Irwin, an executive of Townscape Management Partners, donates \$700 to Joe Buscaino's campaign for City Council.

June 30, 2016
Townscape Management Inc donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016 Tyler Siegel of Townscape Management Partners donates \$700 to Felipe Fuentes's Officeholder Account.

June 30, 2016 John Irwin, an executive of Townscape Management Partners, donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016 Tyler Siegel of Townscape Management Partners donates \$700 to Joe Buscaino's campaign for City Council.

July 22, 2016 David Ryu's staff hold a follow-up **BACKROOM MEETING** with developer lobbyist Richard Lichtenstein.

August 11, 2016 BACKROOM MEETING with Council Member David Ryu, his deputy Julia Duncan and his chief of staff Sarah Dusseault with developer Townscape Partners

What Did Developer Townscape Partners Get?

October 25, 2016 Planning Committee approves of “reduced” size development.

Los Angeles Times reports: *“A mixed-use project that would anchor the eastern edge of the Sunset Strip received preliminary approval Tuesday night after developers*

agreed to a number of compromises, including a request to reduce the size of a proposed 15-story tower. The Planning and Land Use Management Committee voted unanimously to approve the Frank Gehry-designed residential and commercial complex at Sunset and Crescent Heights boulevards. The committee delayed a vote on whether to preserve Lytton Savings, a 1960 bank building designed by architect Kurt Meyer on the project site.

“The Los Angeles City Council is expected to sign off on the development next week. The project at 8150 Sunset Blvd. includes two residential towers with a total of 229 units, including 38 for low-income residents; 65,000 square feet of commercial space; and a pedestrian plaza. ([Los Angeles Times, October 25, 2016](#))

November 1, 2016 Los Angeles City Council approves Townscape Partners’ 8150 Sunset by a unanimous vote.

“The Los Angeles City Council on Tuesday unanimously approved a mixed-use development designed by Frank Gehry that will anchor the eastern edge of the Sunset Strip. The relatively swift approval of the project Tuesday was a contrast to last week’s three-hour discussion on the famed architect’s design for 8150 Sunset Blvd. ([Los Angeles Times, November 1, 2016](#))

November 15, 2016 John Irwin, an executive of Townscape Management Partners, donates \$700 to Jose Huizar’s campaign for City Council.

November 16, 2016 Tyler Siegel of Townscape Management Partners donates \$700 to Jose Huizar’s Officeholder Account.

December 2016

The Los Angeles Conservancy and the group Fix the City, which fights for updated infrastructure, environmental safeguards and other key problems created by major development, sues the City of Los Angeles for failing to comply with CEQA, the California Environmental Quality Act.

7. Sunset Palladium Tower: Miami Developer Crescent Heights

These dual skyscrapers, proposed at the corner of Sunset and Argyle at the location of the famed Palladium concert hall, were approved with height and density exemptions to override local zoning. AIDS Healthcare Foundation is suing the city for violating the City Charter and the California Environmental Quality Act.

December 27, 2012

Sonny Khan of Miami, an executive at Crescent Heights Employment Services, LLC donates \$700 to Alexander Cruz de Ocampo's campaign for City Council.

December 28, 2012 Crescent Heights donates \$700 to Matt Szabo's campaign for City Council.

February 15, 2013

Casey Max Klein, a managing director at Crescent Heights of America, donates \$700 to Matt Szabo's campaign for City Council.

February 19, 2013

Casey Max Klein, a managing director at Crescent Heights of America, donates \$700 to Alexander Cruz de Ocampo's campaign for City Council.

April 30, 2013

Sonny Kahn, the CEO of Crescent Heights, donates \$1,300 to Eric Garcetti's campaign for mayor.

June 19, 2013 Russell Galbut, co-founder of Crescent Heights donates \$700 to Mitch O'Farrell's campaign for City Council.

November 6, 2013 BACKROOM MEETING with Councilmember Mitch O'Farrell and O'Farrell deputy Marie Rumsey and lobbyist Steve Afriat, Crescent Heights executive Bruce Menin and developer lobbyist Aaron Green

June 24, 2014 BACKROOM MEETING with Councilmember O'Farrell, deputy Marie Rumsey, O'Farrell deputy Gary Benjamin and O'Farrell deputy Dan Halden and lobbyist Steve Afriat, Crescent Heights executive Bruce Menin, lobbyist Aaron Green, Crescent Heights attorney Cindy Starrett and Crescent Heights executive Adam Tartakovsky

January 20, 2015 CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Wally Knox's campaign for City Council.

January 21, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Carolyn Ramsay's campaign for City Council.

February 2, 2015 CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Joan Pelico's campaign for City Council.

February 4, 2015 BACKROOM MEETING with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin and O'Farrell deputy Christine Peters and Crescent Heights exec. Bruce Menin, lobbyist Steve Afriat and lobbyist Aaron Green

February 6, 2015 Joan Pelico's campaign returns the \$700 contribution from CH Palladium.

February 10, 2015 Sonny Kahn, developer at Crescent Heights, donated \$700 to Jose Huizar's campaign for City Council.

February 11, 2015 CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Joan Pelico's campaign for City Council.

March 25, 2015 BACKROOM MEETING with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin, and O'Farrell deputy Dan Halden and lobbyist Aaron Green and lobbyist Steve Afriat

April 27, 2015 CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to City Councilman Gilbert Cedillo's Officeholder Account.

June 25, 2015 BACKROOM MEETING with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin, O'Farrell deputy Dan Halden and O'Farrell deputy Marisol Rodriguez and Crescent Heights executive Bruce Menin, Crescent Heights executive Adam Tartakovsky, Crescent Heights executive Elliot Kahn, developer lobbyist Steve Afriat and developer lobbyist Aaron Green

October 21, 2015 BACKROOM MEETING with O'Farrell Staffer Chris Robertson and lobbyist Aaron Green

October 27, 2015 BACKROOM MEETING with Councilmember O'Farrell, O'Farrell deputy Jeanne Min and O'Farrell deputy Chris Robertson and Crescent Heights executive Bruce Menin, Crescent Heights executive Adam Tartakovsky, developer John Kilroy of Kilroy Realty and Kilroy Realty exec. David Simon.

What Did Miami Developer Crescent Heights Get?

November 19, 2015 Los Angeles Planning Commission certified and adopted Environmental Impact Report and approved a General Plan Amendment to dramatically alter the land use, by a unanimous 7-0 vote.

December 10, 2015 Los Angeles Planning Commission approves Palladium development.

Los Angeles Times report: *The Los Angeles City Planning Commission on Thursday backed a proposal for two 30-story residential towers in Hollywood, despite a challenge from the nonprofit group next door.*

Commissioners praised the proposed Palladium Residences, saying the 731-unit project would provide much needed housing on a stretch of Sunset Boulevard served by bus routes and the nearby Metro Red Line subway.

“That housing should be near public transportation, and this is the perfect place for it,” said commissioner Dana Perlman. ([Los Angeles Times, December 10, 2015](#))

January 19, 2016 BACKROOM MEETING with Councilmember O’Farrell, O’Farrell deputy Jeanne Min and O’Farrell deputy Chris Robertson and Crescent Heights executive Bruce Menin and lobbyist Steve Afriat

What Did Developer Crescent Heights Get?

February 2, 2016 Los Angeles City Planning Commission submits their findings, recommending amendments to Los Angeles General Plan to ignore the existing zoning and certifying the Environmental Impact Report.

March 2, 2016 BACKROOM MEETING with O’Farrell Staffer Chris Robertson and developer lobbyist Aaron Green

What Did Developer Crescent Heights Get?

March 22, 2016 Los Angeles City Council unanimously approves Zone Change and Height District change by a unanimous 12-0-3 vote, overriding the existing zoning on the land.

March 23, 2016 BACKROOM MEETING with O’Farrell Staffer Chris Robertson and lobbyist Aaron Green.

8. **NoHo West: Merlone Geier & Goldstein Planning Investments (GPI)**

The NoHo West luxury housing/mall is known as a Black Lung Loft, freeway-adjacent housing that allows children to reside there. USC's Children's Health Study has found these developments cause high levels of lifelong lung damage in children, and USC researchers have testified before the City Council to stop encouraging and granting favors to the developers of Black Lung Lofts. [Los Angeles Weekly coins the phrase "black lung lofts in its cover investigation,](#) followed a few years later by the [Los Angeles Times: <http://www.latimes.com/projects/la-me-freeway-pollution/>](#). This project will allow massive digital billboards that can be seen up to four miles away, and will shine through the curtains of households far from the mall itself. Community groups strenuously fought to stop it.

April 31, 2014 Cliff Goldstein, the founder and managing partner of Goldstein Planning Investment Companies, gives \$700 to Mitch Englander's campaign for City Council.

May 29, 2014 BACKROOM MEETING

with Krekorian Chief of Staff Areen Ibranossian and Cliff Goldstein of GPI Companies.

June 3, 2014 Clifford Goldstein, founder and managing partner of GPI Companies, donates \$700 to Jose Huizar's campaign for City Council.

June 3, 2014 Lee Wagman, a partner at Goldstein Planning Investment Companies, donates \$700 to Jose Huizar's campaign for City Council.

July 28, 2014 Councilmember Paul Krekorian agrees to a private meeting with developers that includes the neighbors: Laurel Grove neighborhood leader Diann Corral who opposes the size and density of the proposed luxury housing/mall complex, Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman, Chief of Staff Areen Ibranossian, Ken and Barbe, GPI exec. Clifford Goldstein, Mike Grehl attend.

October 30, 2014 BACKROOM MEETING with Claire Bronowski, Chad Doi, Krekorian deputy Doug Mensman, Gregg Vandergriff, Krekorian deputy Karo Torossian, Kit Awakuni, Nicholas Hendricks, Robert Duff, Simon Pastucha, GPI exec. Clifford Goldstein, Jameson Lee, Mike Grehl and Lincoln Lee.

December 12, 2014

T.R. Gregory, a partner at GPI Companies, gives \$250 to Carolyn Ramsay's City Council campaign.

December 12 2014

Barbara Wagman, a partner at GPI Companies, gives \$250 to Carolyn Ramsay's City Council campaign.

December 17, 2014 BACKROOM MEETING

with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian and lobbyist Ira Handelman

December 31, 2014

C. Drew Planting, a managing partner at GPI Companies, gives \$500 to Carolyn Ramsay's campaign for City Council.

January 14, 2015 BACKROOM MEETING with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian, and GPI executives Clifford Goldstein and Mike Grehl.

January 15, 2015 Krekorian again agrees to include neighbors in a private meeting that includes Arlene Simon, neighborhood activist Diann Corral, Krekorian deputy Doug Mensman, lobbyist Ira Handelman, Krekorian deputy Karo Torossian, Mike Grehl, Susan Ware, and GPI executive Clifford Goldstein

January 16, 2015 BACKROOM MEETING with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian, GPI exec. Clifford Goldstein, Mike Grehl, Ernesto Hidalgo, lobbyist Ira Handelman, Sam Sonarch, Terri Foster and Mary Garcia.

April 30, 2015 BACKROOM MEETING with lobbyist Ira Handelman, Merlone Geier exec. Scott McPherson, Krekorian deputy Karo Torossian and CD2 Chief of Staff Areen Ibranossian.

June 26, 2015 Lee Wagman of GPI Companies gives \$1,400 to Eric Garcetti's campaign for mayor.

June 30, 2015 BACKROOM MEETING with Lobbyist Ira Handelman, Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman, Ian Thompson.

June 30, 2015

Jonathan Lischke of GPI Companies donates \$1,400 to Eric Garcetti's campaign for mayor.

July 30, 2015 Renderings are finally publicly revealed for NoHo West.

Urbanize LA reports: *Architectural renderings have emerged for NoHo West, a proposed development which would transform North Hollywood's 25-acre Laurel Plaza shopping center into a mixed-use community.*

“The project - which is being developed by a joint venture between Goldstein Planting Investments and Merlone Geier Partners - would include a series of low-rise structures featuring apartments, retail and commercial office space.

“The commercial heart of NoHo West would be Laurel Plaza Drive, a main street slicing diagonally through the development site. Images displayed on the project's official website portray a four-block pedestrian paseo, lined with trees and flanked by shops and restaurants. An elliptical plaza would sit at the mid-point of the paseo, offering water features, landscaping and outdoor seating.

“According to plans filed with the City of Los Angeles, the project would include include 190,000 square feet of retail and restaurant space, as well as a gym, a supermarket and a cinema multiplex. These uses would be served by approximately 2,600 parking spaces, to be located in an eight-story structure abutting the 170 Freeway. (urbanize.LA, July 30, 3015)

July 31, 2015

C. Drew Planting, a managing partner at GPI Companies, gives \$1,400 to Mitch O'Farrell's Legal Defense Fund Account.

July 31, 2015 Clifford Goldstein, founder and managing partner of GPI Companies gives \$1,400 to Mitch O'Farrell's Legal Defense Fund.

August 18, 2015 A huge **BACKROOM MEETING** dubbed a "Major Development Services Meeting" involving dozens of City Employees working to pave the way for the project.

This closed-door meeting included Ara Sargsyan, Assistant Deputy Superintendent of Building at City of Los Angeles; Ashley Atkinson, Planning and Housing specialist, Mayor's office of economic development; Bob Stone, Advisor to Deputy Mayor for Economic Development at City of Los Angeles; Carl Mills, Charlie Rausch, Associate Zoning Administrator and Manager of Major Project Section at City of Los Angeles, Department of City Planning; Colin Kumabe, Sr. Structural Engineer at City of Los Angeles; Estineh Mailian, Senior City Planner at City of Los Angeles; Frank Bush, General Manager of the L.A. Department of Building and Safety; Hani Malki, Ifa Kashefi, Joel Jacinto, Commissioner at Los Angeles Board of Public Works; Karo Torossian, Kevin Keller, Deputy Director, Los Angeles Department of City Planning ;Larry Galstian, Assistant Bureau Chief at City of Los Angeles; Millena Zasadzien, City Planner at City of Los Angeles; Nicholas Marichich, Director of Planning Policy and Development at Office of Los Angeles Mayor Eric Garcetti; Osama Younan, Division Chief at City of Los Angeles; Peter Kim, Senior Structural Engineer at City of Los Angeles, Department of Building and Safety; Regine Osorio, Student Worker at City of Los Angeles Building and Safety; Shahen Akelyan, Verej Janoyan, Wesley Tabijiri, Chen-Yu Kuo, Greg Spotts, Assistant Director, Bureau of Street Services at City of Los Angeles; John Vidovich, Deputy Chief - Fire Marshal at Los

Angeles Fire Department; John Weight, Pascal Challita, Raymond Chan, General manager of Dept. of Building and Safety; Seleta Reynolds, Vince Bertoni, Ed Ebrahimian, General Manager/Director Bureau of Street Lighting at City of Los Angeles; Marvin Moon, Nazario Saucedo.

August 20, 2015 Lee Wagman of GPI Companies gives \$700 to Marqueece Harris-Dawson's Officeholder Account.

September 3, 2015 BACKROOM MEETING with lobbyist Ira Handelman, Merlone Geier executive Scott McPherson, Krekorian deputy Karo Torossian and Krekorian Chief of Staff Areen Ibranossian.

December 12, 2015 Jonathan Lischke of GPI Companies gives \$700 to Councilman Mitch O'Farrell's campaign for City Council.

December 14, 2015 BACKROOM MEETING with GPI executive Cliff Goldstein, Merlone Geier executive Scott McPherson, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian.

December 18, 2015 Clifford Goldstein, founder and managing partner of GPI Companies, gives \$700 to Mitch O'Farrell's campaign for City Council.

December 22, 2015

C. Drew Planting, a managing partner at GPI Companies, gives \$700 to Mitch O'Farrell's campaign for City Council.

January 12, 2016 BACKROOM MEETING with Krekorian deputy Karo Torossian, Claire Bronowski, Chirs Joseph, David Geiser, Krekorian deputy Doug Mensman, Jauld- altoonpartners, Jacqueline Murphy, Jose Sanchez, Lisa Webber, Milena Zasadzien, Matthew Stone, Nicholas Hendricks, Merlone Geier exec. Scott McPherson, Stacie Henderson.

January 22, 2016 BACKROOM MEETING with Merlone Geier Scott McPherson, GPI exec. Cliff Goldstein, Krekorian deputy Karo Torossian, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian.

March 8, 2016 BACKROOM MEETING with Merlone Geier exec. Scott McPherson and CD2 Chief of Staff Areen Ibranossian.

July 7, 2016 RARE private meeting involving a neighborhood activist opposing the project, Diann Corral, and Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman and CD2 Chief of Staff Areen Ibranossian.

July 7, 2016 BACKROOM MEETING with CD deputy Karo Torossian, lobbyist Ira Handelman and Stephen Logan.

August 4, 2016 BACKROOM MEETING with Merlone Geier exec. Scott McPherson, Stephen Logan, Krekorian deputy Karo Torossian, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian

September 1, 2016 BACKROOM MEETING with Merlone Geier exec. Scott McPherson, Krekorian deputy Karo Torossian and Krekorian Chief of Staff Areen Ibranossian.

What Did Developers Merlone Geier & Goldstein Planning Investments (GPI) Get?

September 22, 2016 Los Angeles Daily News Report:

Los Angeles Planning Commission approves proposal for NoHo West. Paul Krekorian spoke in favor of the development at the hearing. They recommended to the City Council that Zone Change and Height Change be adopted to override existing zoning on the land.

"The Los Angeles Planning Commission on Thursday backed a proposal for NoHo West, a residential and commercial development planned on the site of the old Laurel Plaza shopping center and soon-to-be-shuttered Macy's in North Hollywood.

"If approved by the city, NoHo West would bring 642 rental housing units, 256,000 square feet of office and retail use, and 316,000 square feet of new commercial development, including a cinema, to the 25-acre site.

The development — at the corner of Laurel Canyon Boulevard and Oxnard Street — is a joint venture between Merlone Geier Partners and GPI Co.

Los Angeles Councilman Paul Krekorian, who represents North Hollywood, spoke in favor of NoHo West at Thursday's hearing. He also sent a letter to the commission last week, calling the development "a shot of adrenaline to the area by delivering retail and entertainment facilities for the community." ([Los Angeles Daily News, September 22, 2016](#))

September 25, 2016 Councilmember Paul Krekorian writes letter in support of project.

December 12, 2016

C. Drew Planting, a managing partner at GPI Companies, gives \$560 to Mitch O'Farrell's Officeholder Account.

What Did the Developers Merlone and GPI Get?

December 14, 2016 Los Angeles City Council by a unanimous 14-0 vote approves it by implementing zone and height changes recommended by the Planning Commission.

9. **Clarendon Luxury Complex: Developer AMCAL Housing**

Clarendon is known as a Black Lung Loft—freeway-adjacent housing that allows children to reside there. USC's seminal Children's Health Study has found these developments result in high levels of lifelong lung damage among children, and USC researchers have testified before the City Council to end their practice of encouraging and granting favors to the developers of Black Lung Lofts. Los Angeles Times: <http://www.latimes.com/projects/la-me-freeway-pollution/>

August 29, 2005

AMCAL General Contractor's Inc donates \$500 to Jose Huizar's campaign for City Council.

December 4, 2008 AMCAL Multi-Housing Corp donates \$500 to Herb Wesson's campaign for City Council.

February 17, 2009 AMCAL Multi-Housing Corp donates \$500 to Eric Garcetti's campaign for City Council.

December 23, 2010 AMCAL General Contractors, Inc donates \$500 to Jose Huizar's campaign for City Council.

December 13, 2011 AMCAL Multi-Housing Corp donates \$1,000 to Eric Garcetti's campaign for mayor.

March 12, 2012 Percival Vaz, the CEO of AMCAL Multi-Housing, Inc, donates \$500 to Jose Huizar's campaign for City Council.

May 1, 2012 Maurice Ramirez, a developer of AMCAL Housing, donates \$1,000 to Eric Garcetti's campaign for mayor.

April 4, 2013 J. Maurice Ramirez, executive vice president of AMCAL Housing, donates \$200 to Curren Price's campaign for City Council.

April 9, 2013 Percy Vaz, CEO of AMCAL Multi-Housing, donates \$500 to Nury Martinez's campaign for City Council.

April 16, 2013 Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 7, 2013 Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 11, 2013 Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 13, 2013 J. Maurice Ramirez, a developer at AMCAL Multi-Housing, donates \$100 to Mitch O'Farrell's campaign for City Council.

April 22, 2015 BACKROOM MEETING with Bob Blumenfeld's City Council District 3 deputy Cesar Diaz, CD 3 deputy Andrew Pennington, Darin Hansen of AMCAL, Eric Leiberman of QES, Inc.

June 5, 2015 BACKROOM MEETING with Blumenfeld's deputy Andrew Pennington, CD 3 deputy Cesar Diaz, Darin Hansen of AMCAL and Eric Leiberman of QES, Inc.

June 22, 2015 AMCAL Multi-Housing Corp donates \$700 to Jose Huizar's campaign for City Council.

September 3, 2015 BACKROOM MEETING with Blumenfeld deputy Andrew Pennington, Councilmember Bob Blumenfeld, and Percy Vaz of AMCAL.

November 12, 2015 BACKROOM MEETING with CD 3 deputy Andrew Pennington, Darin Hansen of AMCAL and Eric Leiberman of QES, Inc.

April 5, 2016 AMCAL Multi-Housing LLC donates \$500 to Marqueece Harris-Dawson's campaign for City Council.

June 2, 2016 Draft Environmental Impact Report published on project.

Urbanize LA reports: "A draft environmental impact report published by the Los Angeles Department of City Planning has revealed AMCAL Multi Housing Company's proposal for a new apartment complex on the site of the Woodland Hills Post Office.

The proposed Clarendon Street Apartments, slated for a 4.2-acre site at 22055-22147 Clarendon Street, would consist of a five-story building features 335 studio, one-, two- and three-bedroom apartments, in addition to enclosed parking accommodations for 564 vehicles and 369 bicycles. Plans also call for a variety of open space amenities,

including three courtyards, a fitness center, a dog park and a club room. ([urbanize.LA, June 9, 2016](#))

July 1, 2016 Maurice Ramirez, a developer at AMCAL, donates \$250 to Curren Price's campaign for City Council.

July 21, 2016 BACKROOM MEETING with Blumenfeld deputy Andrew Pennington, Abraham Mercado of Consensus Inc, Eric Leiberman of QES, Inc, Darin Hansen of AMCAL, Josh Gertler of Consensus Inc.

November 17, 2016 Los Angeles Planning Commission recommends making height and zoning change that ignore local zoning and create a lucrative development project.

January 20, 2017
Project referred to Planning and Land Use Management Committee by City Council.

What Did the Developer AMCAL Get?

March 3, 2017 LA City Council approves the project with lucrative zone and height change exemptions that ignore the local Specific Plan and Community Plan.

10. Martin Expo Town Center: Developer Martin Automotive Group

Owners of Martin Cadillac at Bundy and Olympic are trying to build a 10-story luxury housing office tower mega-development of 807,200 square feet. The group Westsiders Opposed to Overdevelopment sues the City for failing to address the project's significant traffic impacts and environmental impacts.

June 4, 2012 Martin Automotive Group donates \$700 to Bill Rosendahl's campaign for City Council.

November 27, 2012 Martin Automotive Group donates \$500 to Mike Bonin's campaign for City Council.

January 29, 2013 BACKROOM MEETING between Bonin Councilmember Mike Bonin with Jaime Rojas and lobbyist Steven Afriat about Martin Cadillac.

June 6, 2013 Martin Automotive Group donates \$500 to Eric Garcetti's campaign for mayor.

August 21, 2013 BACKROOM MEETING with lobbyist Steve Afriat, Noel Fleming, Mike Bonin deputy Tricia Keane and Mike Bonin chief of staff Chad Molnar.

December 5, 2013 BACKROOM MEETING "Martin Expo Town Center Design Meeting" with Bonin deputy Tricia Keane, LA City Planner Luciralia Ibarra, lobbyist Phil Simmons, Simon Pastucha and Tom Hsieh.

September 5, 2014 BACKROOM MEETING at Los Angeles City Planning Department with Chris Robertson, J Miller, lobbyist Philip Simmons, Simon Pastucha, Tom Hsieh and Mike Bonin deputy Tricia Keane.

October 23, 2014 BACKROOM MEETING between developers and Chris Robertson, Bonin deputy Claudia Luna and Bonin deputy Tricia Keane.

November 2014 Draft Environmental Impact Report published.

November 19, 2014 BACKROOM MEETING Martin Expo Town Center Meeting with Chris Robertson, Bonin deputy Tricia Keane and Bonin deputy Paul Backstrom.

January 21, 2015 BACKROOM MEETING with Bonin staff and lobbyists Steve Afriat and Aaron Green.

September 17, 2015 BACKROOM MEETING with lobbyist Steve Afriat, Bonin deputy Tricia Keane, Chris Robertson and Councilmember Mike Bonin.

December 2015 Final Environmental Impact Report published for the project.

February 9, 2016 BACKROOM MEETING with Bonin deputy Tricia Keane and Councilmember Mike Bonin.

April 13, 2016 Martin Automotive Group donates \$300 to Gil Cedillo's campaign for City Council.

April 18, 2016 BACKROOM MEETING with Bonin deputy Tricia Keane, Bonin deputy Ezra Gale, Dave Bantz, lobbyist Phil Simmons and Tom Perkins on METC design.

April 20, 2016 BACKROOM MEETING between Bonin deputy Tricia Keane, Bonin deputy Ezra Gale, Bonin deputy Marietta Torriente, lobbyist Steve Afriat and Councilmember Mike Bonin.

May 4, 2016 BACKROOM MEETING between lobbyist Joel Miller and Bonin deputy Tricia Keane.

May 10, 2016 BACKROOM MEETING between Martin Automotive Group CEO Dan Martin and Councilmember Mike Bonin.

May 11, 2016 PRIVATE CALL between lobbyist Steve Afriat and Bonin deputy Tricia Keane.

May 13, 2016 PRIVATE CALL between Martin Automotive Group CEO Dan Martin, Bonin deputy Tricia Kean, and land-use attorney Alex DeGood.

May 17, 2016 PRIVATE CALL between Bonin deputy Tricia Keane, Martin Automotive Group CEO Dan Martin and lobbyist Philip Simmons.

May 20, 2016 PRIVATE CALL between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin.

May 24, 2016 PRIVATE CALL between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin

May 25, 2016 PRIVATE CALL between Bonin deputy Tricia Keane, attorney Alex DeGood and Martin Automotive Group CEO Dan Martin.

What Did Developer Martin Automotive Get?

May 26, 2016 Mayor Garcetti's appointees on the Los Angeles City Planning Commission approve by an 8-0-1 unanimous vote, 1 absent, to throw out the area's Community Plan, approving a General Plan amendment, a vesting zone change and a Height District change that override existing zoning. It recommends action to the City Council.

May 27, 2016 PRIVATE CALL between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin.

May 28, 2016 PRIVATE CALL

between lobbyist Steve Afriat, Martin Automotive Group CEO Dan Martin and Bonin Chief of Staff Chad Molnar.

June 8, 2016 Private “Signal Discussion” with attorney Alex DeGood, Martin Automotive Group CEO Dan Martin, Tom Gaul and Bonin deputy Tricia Keane.

June 30, 2016 PRIVATE CALL between lobbyist Steve Afriat and Bonin deputy Tricia Keane.

July 15, 2016 BACKROOM MEETING with Bonin deputy Ezra Gale, Aaron (No last name given, probably lobbyist Aaron Green), Len Nguyen, Don Swiers and a redacted name.

August 3, 2016 BACKROOM MEETING with lobbyist Steve Afriat, Bonin deputy Tricia Keane and Bonin Chief of Staff Chad Molnar.

August 12, 2016 Private meeting between developers and neighborhood opponents: Aaron (No last name, probably lobbyist Aaron Green), Bonin deputy Ezra Gale, Len Nguyen, neighborhood activist Xochitl Gonzalez and a redacted name.

August 15, 2016 BACKROOM MEETING meeting with Martin Automotive Group CEO Dan Martin and likely L.A. City Councilmember Mike Bonin.

August 22, 2016 BACKROOM MEETING with Bonin deputy Tricia Keane and Councilmember Mike Bonin.

What did Developer Martin Automotive Get?

September 20, 2016 The Los Angeles City Council, by a 12-0-3 vote, unanimously approves a General Plan Amendment and Zone Change, overriding existing zoning for the land.

September 21, 2016 Private conference call with Bonin deputy Tricia Keane, attorney Alex DeGood, lobbyist Phil Simmons, Sharon Dickinson of PLUM.

September 30, 2016 Mayor Garcetti transmits his approval of council action.

October 17, 2016 Martin Automotive Group donates \$250 to Curren Price’s campaign for City Council.

11. **Alexan 27-Story Skyscraper: Developer Trammell Crow**

This luxury tower in DTLA will obliterate most viewpoints Angelenos have of the historic 1930s Art Deco Eastern Columbia Building, a famed L.A. landmark. Historic preservationists fought hard against the project.

October 10, 2010 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Paul Krekorian's campaign for City Council.

October 11, 2011 Brad Cox, a real estate investor at Trammell Crow Company, donates \$500 to Eric Garcetti's Officeholder Account.

December 8, 2011 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bill Rosendahl's campaign for City Council.

September 24, 2012 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Eric Garcetti's campaign for mayor.

October 14, 2012 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Mike Bonin's campaign for City Council.

December 22, 2012 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bob Blumenfield's campaign for City Council.

August 26, 2013 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Nury Martinez's campaign for City Council.

November 13, 2013 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Jose Huizar's campaign for City Council.

July 31, 2014 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Mike Bonin's campaign for City Council.

April 22, 2015 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Marqueece Harris-Dawson's campaign for City Council.

August 5, 2015 BACKROOM MEETING with Council member Jose Huizar, CD 14 deputy Kevin Ocuillo with lobbyist Morrie Goldman and Trammell Crow Residential

September 10, 2015 E. Garth Erdossy, a real estate developer at Trammell Crow Residential, donates \$700 to Jose Huizar's campaign for City Council.

October 23, 2015 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Curren Price's campaign for City Council.

October 28, 2015 BACKROOM MEETING with lobbyist Morrie Goldman and CD 14 staffers Clare Eberle and Shawn Kuk, and CD 14 chief of staff Paul Habib.

November 17, 2015 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Marqueece Harris-Dawson's Officeholder Account.

December 9, 2015 BACKROOM MEETING with Huizar deputy Clare Eberle, Estela Lopez, John Readey of Trammell Crow, Kelly Farrell of Callison RTKL, Huizar chief of staff Paul Habib, Sara Hernandez and Huizar deputy Shawn Kuk

February 2, 2016 BACKROOM MEETING Private meeting with Huizar deputy Shawn Kuk, Alex Irvine and John Ready of Trammell Crow.

March 13, 2016 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bob Blumenfield's campaign for City Council.

March 22, 2016 BACKROOM MEETING with Councilmember Jose Huizar, his deputy Shawn Kuk and Trammell Crow Residential.

May 1, 2016 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Mitch O'Farrell's campaign for City Council.

June 29, 2016 BACKROOM MEETING with Huizar deputy Paul Habib, Huizar deputy Shawn Kuk, Martin Schlageter and John Readey of Trammell Crow.

June 30, 2016 Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Paul Koretz's campaign for City Council.

December 12, 2016 E. Garth Erdossy, a real estate developer at Trammell Crow Residential, donates \$700 to Jose Huizar's campaign for City Council.

October 12, 2016: Media Reports surface of a DTLA neighborhood group hiring Robert Silverstein, an attorney renowned for halting illegal development projects.

"The battle over a tower proposed right next to the Eastern Columbia Lofts, the majestic turquoise Art Deco building in Downtown Los Angeles, is heating up, and the

tower's opponents have an ace up their sleeve: Robert Silverstein, the Pasadena attorney best known for bringing construction on the East Hollywood Target to a halt.

Silverstein is representing a group of Downtown residents in their appeal of the city planning department's approval of the tower. Called the Alexan, it would rise 27 stories from a parking lot at the corner of 9th and Hill. That's tall enough to block views of the Eastern Columbia's iconic clock tower, and opponents, who have organized under the name Society for the Preservation of Downtown Los Angeles, say the new structure just doesn't jive with the neighborhood's character. ([Curbed Los Angeles, October 12, 2016](#))

What Does the Developer Trammel Crow Get?

October 25, 2016 Central Area Planning Commission rules that the project does not need an Environmental Impact Report to move forward.

12. **Ferrante Luxury Complex: Developer Geoff Palmer**

Ferrante is a Black Lung Loft—freeway-adjacent new housing allowing children.

USC's seminal Children's Health Study has found these developments result in lifelong lung damage among children, and USC researchers have testified to

the City Council to end their practice of encouraging and granting favors to Black Lung Lofts. [Los Angeles Times: http://www.latimes.com/projects/la-me-freeway-pollution/](http://www.latimes.com/projects/la-me-freeway-pollution/)) [L.A. Weekly: http://www.laweekly.com/news/](http://www.laweekly.com/news/)

March 9, 2006 Geoff Palmer, owner of GH Palmer Associates, donates \$500 to Jose Huizar's campaign for City Council.

September 23, 2010 Geoff Palmer, owner of GH Palmer Associates, donates \$500 to Jose Huizar's campaign for City Council.

March 19, 2014 BACKROOM MEETING with Councilman Gil Cedillo's deputy Gerald Gubatan and GH Palmer Associates vice-president Darrel Malamut

April 23, 2015 BACKROOM

MEETING with Cedillo's deputy Gerald Gubatan, GH Palmer Associates exec. Darre I Malamut, Blake Lamb, Jennifer Karmels, Sergio Infanzon.

November 10, 2015 Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Gil Cedillo's campaign for City Council.

November 19, 2015 BACKROOM MEETING with Councilmember Gil Cedillo, Cedillo's senior planning deputy Gerald Gubatan, GH Palmer Associates senior vice-president Darrel Malamut.

February 4, 2016 Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Mike Bonin's campaign for City Council.

March 29, 2016 Initial study released on project.

June 6, 2016 PRIVATE LUNCH between Councilmember Gil Cedillo, senior planning deputy Gerald Gubatan and Geoff Palmer at Central Kitchen at The Lorenzo.

June 30, 2016 PRIVATE MEETING at Checkers Hilton Restaurant in DTLA with Councilmember Gil Cedillo, Cedillo's chief of staff Arturo Chavez, senior planning deputy Gerald Gubatan and GH Palmer vice-president Darrel Malamut.

June 30, 2016 Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Gil Cedillo's Officeholder Account.

**SO, How Much Money Did these 12 Developers,
Rewarded Lucrative Exemptions from
Existing Planning and Environmental Laws, Spend on
Los Angeles City Hall Elected Officials?**

TOTAL INFLUENCING: \$11.1 MILLION

Crossroads, Mort La Kretz and Harridge Development: 2004-2016 **\$1 million in campaign and lobbying cash**

Rick Caruso: 2000-2016 **\$418,000 in campaign and lobbying cash**

Michael Hakim and Colony Holdings: 2005-2015 **\$1.2 million in campaign, lobbying, and City Hall trust fund cash**

Carmel Partners: 2013-2016 **\$545,476 in campaign and lobbying cash**

Kanon Ventures: 2001-2015 **\$369,775 in campaign and lobbying cash**

Townscape Partners: 2013-2016 **\$832,370 in campaign and lobbying cash**

Crescent Heights: 2000-2016 **\$2.6 million in campaign and lobbying cash**

Merlone Geier and Goldstein Planting Investments: 2008-2015 **\$428,431 in campaign and lobbying cash**

AMCAL: 2000-2016 **\$245,577 in campaign contributions and lobbying cash**

Martin Automotive Group: 2012-2016 **\$762,771 in campaign and lobbying cash**

Trammell Crow: 2000-2016 **\$1.9 million in campaign and lobbying cash**

Geoff Palmer: 1999-2016 **\$886,599 in campaign and lobbying cash**



Ethics Policy <ethics.policy@lacity.org>

Policy Review, Campaign Finance, Public comment

1 message

Carolina Goodman [REDACTED]

Wed, Feb 13, 2019 at 1:03 PM

To: ethics.policy@lacity.org

Cc: david.tristan@lacity.org

See attached.

 **2.13.19 LWVLA to Ethics Commission-1.pdf**
70K



LEAGUE OF WOMEN VOTERS® OF LOS ANGELES

Trusted, Nonpartisan Grassroots Leadership Since 1920.
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February 13, 2019

Los Angeles Ethics Commission

City Hall, 24th Floor
200 North Spring Street
Los Angeles, CA 90012

Dear Commissioners,

The League of Women Voters of Los Angeles has worked with the Ethics Commission since its inception in 1990. We stand for fair elections and citizen participation in the political process by reducing the influence of money in politics. The recent package of campaign finance reforms you recommended to City Council last fall was a step in the right direction. Still, there are more improvements that can make democracy work better in Los Angeles City.

Qualifying Aggregate Threshold for Public Funding of Campaigns:

We strongly support Councilmember Bonin's amendment to reduce the qualifying aggregate threshold to \$11,400 (or lower). Under the current rule, Los Angeles requires four times as much as New York City, and candidates would need almost twice as many contributions than was required in the most recent elections. A lower threshold would encourage grassroots candidates.

Developer Ban, People-Only Models and Behested Payments

In addition, we were aware of the effort by the Los Angeles Ethics Commission last summer to address potential pay-to-play campaign contributions by developers, and we look forward to the recommendation that you will ultimately make to City Council that will clearly and effectively prevent the inappropriate influence of money in city politics. The recent FBI investigations into City Hall makes it all the more important that Los Angeles enact policies and procedures to enable candidates to compete more equitably in public office.

There are a number of models of developer bans that other cities have successfully implemented – for example, Temple City and Pasadena – which we expect you will be investigating. We are particularly interested in “people only” models. Combining this with a developer ban would offer administrative clarity, make a developer ban easier to implement, and would offer transparency for voters. Berkeley and San Diego have programs that Los Angeles should consider. (Please refer to the specifics outlined in the recent letter you received from Sean Morris of Represent LA – San Gabriel Valley.)

We support your efforts to explore the ways in which behested payments can influence decisions made by elected officials.

Debate Requirement

Thank you for being aware that the current language around “town hall” must be clarified. Indeed, candidates accepting public funds should be required first and foremost to participate in a debate with opponents. If, after a good-faith effort by the candidate to schedule a debate, the opponent refuses the invitation, then a public event — not a campaign rally — may be organized so that the public has the opportunity to ask questions.

We look forward to following closely your continued work in the area of campaign finance reform.

Sincerely,

Handwritten signatures of Martha Sklar and Crissi Avila in blue ink.

Martha Sklar and Crissi Avila, Co-Presidents
League of Women Voters of Los Angeles



Ethics Commission: Proposes Ban On Developer Contributions

1 message

Phil Davis [REDACTED]
To: ethics.policy@lacity.org

Tue, Feb 5, 2019 at 9:43 PM

I support the proposed ban on contributions and donations by real estate or other developers to City Council Members and the Mayor (direct and "behested" contributions) and strongly urge the Commission to implement such a ban.

Phil Davis
Los Angeles
Resident of CD5



Comment for the FBI probe of city hall and developer connections

1 message

Gina K. Thornburg [REDACTED]
Reply-To: "Gina K. Thornburg" [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Thu, Jan 31, 2019 at 11:58 PM

Dear Madam or Sir:

I live in Woodland Hills in Councilmember Bob Blumenfield's district. In spring 2017 I became interested in local development issues because I was alarmed at some of the massive mega-developments proposed for our community, particularly for the Warner Center 2035 Specific Plan district. I have lived in the West Valley for 28 years, and traffic and air pollution are getting worse.

Upon invitation I was appointed to the Woodland Hills-Warner Center Neighborhood Council. I serve on the homelessness committee and am starting a new environmental sustainability committee.

After almost two years of attending many, many meetings and trainings and gaining an understanding of development processes, I have some deep concerns about how the specific plan came about, why it is being allowed to continue as is, and why Councilmember Blumenfield and Mayor Eric Garcetti elevate certain people to particular advisory boards, when there is either a conflict of interest for these people or their background is so opaque it's impossible to know why they hold such influence and sway over Blumenfield or Garcetti.

To wit:

1. Why was architect Dennis DiBiase, a Woodland Hills resident who is a principal in the Santa Monica architectural firm VTBS, allowed to serve on the Woodland Hills-Warner Center Neighborhood Council for 10 years during which some of that time he also served on the Community Advisory Committee that helped write the Warner Center 2035 Specific Plan? He resigned from the NC board in fall 2017. He and his architectural firm now have from three to five projects filed under the specific plan. One of them is a major 24-acre redevelopment of a beautiful corporate office park at the corner of Burbank and De Soto. The developer, Michael Adler, was never into development before he met Mr. DiBiase. He told me it was at Mr. DiBiase's suggestion in 2013, while Dennis was still a member of the NC board, that he decided to redevelop the office park.
2. Mr. DiBiase quit the NC board the first month that I began my tenure on it.
3. Why did Councilmember Blumenfield appoint Mr. DiBiase to the Ventura-Cahuenga Blvd. Specific Plan Plan Review Board?
3. Does Mr. DiBiase have any material or financial interest in any property along the stretch of Ventura Blvd. for which Councilmember Blumenfield has accepted an idea to upgrade, beautify, and remodel? This stretch is west of Fallbrook Avenue.
4. August Steurer is not on the board of our NC. Yet he is chair of the Woodland Hills Impacts and Policies Committee. Who is he? He is a Santa Monica resident whose stake in our community supposedly is employment at a home-based business of another WHWCNC board member, Heath

Kline. He, too, served on the community advisory committee to write the Warner Center 2035 Specific Plan. Why in the world was he Mayor Garcetti's appointee to the Ventura-Cahuenga Blvd. Specific Plan Plan Review Board? The Valley has nearly 2 million LA residents in it. Could the mayor not find anyone else to serve on this board?

5. Agoura resident Brad Rosenheim of Rosenheim & Associates is a consultant whose business it is to help developers get through the red tape to make their projects happen. His name is on almost every project filed with the city for Woodland Hills. He represents developers at public meetings regularly. Campaign contribution records (see attached) show that his wife, Devon, donated to Councilmember Blumenfield's campaign.

6. Public records show that most of the councilman's contributions came from local and nonlocal developers or professions linked to development, such as architects, real estate firms, insurance, contractors, and unions.

7. A former employee of Mr. Rosenheim's, Tricia Robbins Kasson, has been a staff member of councilman Blumenfield's for a few years. She ran unsuccessfully for the AD 45 seat when it was vacated by Matt Dababneh. She serves in some nonvoting role on the new Warner Center Specific Plan Plan Implementation Board.

8. Do any of these people, DiBiase, Steurer, or Kline have any relationship with the Southern California Association of Governments? Have any of them ever been paid consultants for SCAG? If not them, then what about Marty Lipkin, who also serves on the WHWCNC board?

Please consider pursuing my questions in your investigation of City Hall's ties to developers.

Thank you for your consideration of my request.

Sincerely,

Gina

*Gina K. Thornburg, PhD
Geographer, writer, editor, activist*

*Founder
Coalition for Valley Neighborhoods*

 CampaignContributions_Blumenfield.xlsx
63K



Proposed ban on campaign contributions from developers

1 message

Michael Sinkov [REDACTED]
To: ethics.policy@lacity.org

Thu, Jan 31, 2019 at 3:10 PM

There is a widespread perception that the members of the LA City Council are unduly influenced by developers and their army of lobbyists, attorneys, expeditors, campaign contributors and bought and paid-for planners. Among many other reasons are the history of granting to developers a vast array of discretionary changes to their projects, with no meaningful consideration of the impacts of such changes on the immediate neighborhood, on the community plan, on utilities infrastructure, on growth-inducing impacts, social services, etc., etc., etc.

Due to the invidious consequences of the rule of fifteen, by virtue of which each member of the council has sole and unfettered authority to approve or disapprove any and all developer requests as quid pro quo for such members granting carte blanche to the decisions of every other council member, the influence of campaign contributions is exacerbated and made relatively inexpensive simply because it is cheaper to grease one palm than it is to grease eight.

The rot that pervades city planning processes was expressed by Gail Goldberg who, as head of city planning, declared, "In LA, zoning is whatever the developer asks for it to be." The cynical ignoring of the general public interest has resulted in incompetence in creating public policy not just in planning, but on issues like billboard regulation, marijuana store regulation, homelessness and a host of other matters.

Drastic measures are necessary if the situation is to ever improve. BTW, I have no confidence that the council or ethics commission or any other organ of city government will ever take any action to improve the situation. Please prove me wrong.

Michael Sinkov
[REDACTED]



Comments for the record

1 message

Sean McMorris [REDACTED]

Thu, Jan 31, 2019 at 2:34 PM

To: "ethics.policy" <ethics.policy@lacity.org>, ethics.commission@lacity.org

Hello,

I am attaching comments for the record for the next Los Angeles Ethic's Commission meeting. The comments and research are on behalf of Represent Los Angeles-San Gabriel Vally.

Thanks,
Sean McMorris

 **3rd letter to LA Ethics Comm (Models for L.A. to consider).pdf**
465K



Los Angeles Ethics Commission

200 North Spring St.
City Hall, 24th Floor
Los Angeles, CA 90012

To the Commissioners:

Represent Los Angeles San Gabriel Valley supports Councilman Bonin's Amendment regarding the qualifying threshold.

In addition, in light of the recent developments surrounding the FBI investigation into potential pay-to-play payments from developers and lobbyists to Councilman Huizar and others at city hall, Represent.Us encourages the L.A. Ethics Commission to seriously consider a ban on campaign funds from developers or all non-people. To that end, Represent Los Angeles-San Gabriel Valley has compiled some research for your viewing on developer bans and people only models that currently exist in California cities. It may be helpful in determining how to implement similar bans in Los Angeles.

Current Campaign Donor Ban Models to Consider

Regarding a developer ban on campaign donations to city councilmembers, there is precedence. There is also precedence for a triggered short-term ban on people and entities who seek a "public benefit" over a certain amount. In addition, there are multiple "people only" models.

The Temple City Model

Temple City residents voted to pass [Measure AA](#) in 2016, which bans developers and city contractors from donating to city council campaigns and city commissioners.

Before Measure AA passed, the Temple City City Council imposed upon itself, via [city council protocol](#), which is part of the Temple City Municipal Code (Section 603H), donor limits and recusal requirements if they accepted campaign donations from vendors, developers, or city contractors. The protocol mandated that a "Councilmember shall not participate in any Civic Action (unless participation is legally required) regarding any Contractor, Vendor, or Developer from whom a Councilmember has received a campaign contribution of \$250 or more in the previous 24 months."

After Measure AA's passage in 2016, Temple City amended the Conflict of Interest section of its Municipal Code to read as follows:



The lawful provisions of applicable and/or general law, with regard to conflict of interests, prohibited interests, and disclosure of assets shall apply to, and govern the activities of each elective officer of the city.

In addition to the foregoing, elective officers of the city and candidates for elective office shall not accept from any contractor or developer any campaign contributions, including but not limited to direct donations, cash donations, loans, in-kind donations, or other non-cash contributions. Elective officers of the city shall also not accept from any contractor or developer any "gift" as defined by the California political reform act or the fair political practices commission regulations interpreting the act, without full reimbursement. (Res. 16-5187)

Temple City also included a robust definition of what a Developer and Contractor are in order to better prevent circumvention of the law via LLCs, shareholders, and various other people associated with the entity/person seeking the public benefit. The following are Temple City's definitions of a developer and city contractor:

Developer shall mean any person or entity who is currently seeking, or who has an interest in or expectation of seeking from the city a specific plan, zone change, development agreement, density bonus, subdivision tract map, or conditional use permit for a sensitive use (i.e. adult business, massage parlor, etc.), or an industrial or commercial use having a building area of 20,000 square feet or more. The term shall include any agent or representative of the developer and where the developer is a business entity shall include all owners, shareholders, principals, partners, members, officers, directors, and managers.

Contractor shall mean any person or entity that has an existing contract, agreement, or other arrangement to provide the city with goods, services, or other items, or who has an interest in or expectation of obtaining such a contractual arrangement in the future. The term shall include any agent or representative of the contractor and where the contractor is a business entity shall include all owners, shareholders, principals, partners, members, officers, directors, and managers. The term contractor shall not include any person or entity contracted to provide the services of an appointive officer of the city.

The Pasadena Model

In the City of Pasadena, CA, the person/entity ban only kicks in if a person or entity receives a "public benefit" of a certain amount, and the ban is then limited to public benefit negotiating periods and 1 fiscal year after the public benefit is bestowed.



Pasadena instituted the [Taxpayer Protection Act](#) (TPA) in 2000. The TPA bans "City public officials" (city councilmembers, commissioners, etc.) for one fiscal year from accepting campaign donations, gifts, or employment for compensation from a person or entity who received a "public benefit" from the city of \$25,000 or more, an amount that is adjusted every five years to match the consumer price index. The TPA also institutes a "pre-contractual blackout period," or ban on campaign donations to candidates or councilmembers during negotiations of a public benefit from persons or entities seeking that public benefit.

Generally, the TPA prohibits a "City public official" from exercising discretion to approve or voting to approve a "public benefit" and subsequently receiving a "personal or campaign advantage" from the person(s) who received the "public benefit" for specified time periods.

The TPA also prohibits a Council member or candidate for City Council from accepting "personal or campaign advantages" from entities who are in negotiations with the City regarding a contract, lease, or land sale that will be approved by the Council.

To prevent circumvention of the law, the TPA defines a recipient of a public benefit as an "applicant and anyone who is an officer in or has more than a 10% interest in the applicant entity." To quell confusion and extra research on the city's end, an applicant must apply using his/her own name and not a representatives name.

The recipient of the public benefit, and those subject to the pre-contractual blackout provisions, include the applicant and anyone who is an officer in or has more than a 10% interest in the applicant entity. The TPA requires the City to ask that the applicant disclose to the City its trustees, directors, partners, officers, and those with a 10% equity, participation or revenue interest in the applicant. This means that applicants for land use approvals may not apply through a representative, but must apply in their own name. These disclosures are public records and must be provided to the public if requested.

How does a "City public official" track compliance with the TPA?

The City maintains three lists: (1) one of persons or entities receiving public benefits from the City; (2) another of those on the pre-contractual blackout period list; and (3) although not required as part of the TPA, a list of 501(c)(3), (4) and (6) entities who receive public benefits. City public officials and Council members/candidates have a separate, independent duty to ensure that they do not receive any personal or campaign advantages from persons on the first two lists in violation of the TPA.

Something that should be considered when viewing the Pasadena model is its lack of a voting recusal policy for councilmembers if they accept a campaign contribution from a person or entity just prior to that person or entity's application for a public benefit. A recusal period (perhaps 6 to 12 months) from voting on entitlements or benefits for people or entities who a councilmember received a campaign donation from just prior to their application could be instituted in tandem with the one year ban on campaign donations once a public benefit has been received. Doing so would plug the loophole of a



person or entity giving to influence the outcome of the public benefit application process before they apply for said public benefit.

San Diego and Berkeley "People Only" models

San Diego's "people only" campaign contribution model has been upheld by the 9th Circuit Court of Appeals. It institutes that only people, not entities (LLCs, organizations, etc.) can donate to a candidate's campaign committee.

Section 27.2950 of the San Diego Municipal Code states:

Prohibitions and Limits on Contributions From Organizations

It is unlawful for a candidate or controlled committee, or any treasurer thereof, or any other person acting on behalf of any candidate or controlled committee, to solicit or accept a contribution from any person other than an individual or a political party committee for a City candidate election.

Similarly, the City of Berkeley bans entities from donating to city council campaigns. Section 2.12.44 of the Berkeley Municipal Code states:

Contributions from certain organizations and business entities prohibited.

No proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, including non-profit corporations, or labor union shall make a contribution to any candidate or committee (supporting or opposing any candidate) directly or indirectly, and no campaign treasurer (of any such committee) shall solicit or accept such contribution. (Ord. 6096-NS § 1, 1991: Ord. 4701-NS § 1 (part), 1974: Ord. 4700-NS § 605, 1974)

These models address not just developer giving, but all giving from entities (LLCs, non-profits, etc.).

The San Diego model has language that addresses some potential loopholes regarding bank accounts, but it does not have language to address the gaping loophole of numerous individuals associated with one or multiple affiliated entities seeking entitlements or public benefits (shareholders, boards, CEOs, etc.) who are now able to each give the max campaign donation as an "individual" as opposed to other models that require individuals associated with an entity to aggregate their donations as one donation from the same entity. San Diego's requirement that campaign donations come from individual/family bank accounts probably addresses this loophole as it pertains to unions (i.e. organizations reliant upon small dollar donations or dues from middle-to-low-income people), but not business entities like developers and city contractors that consist of multiple big-dollar earners and wealthy shareholders.



Thus, it is recommended that language that addresses this loophole be added to any "people's only" model considered by L.A. Perhaps language similar to the Temple City or Pasadena model, both of which include associated links within the definition of entities that seek public benefits, can be included in the legislation to ensure special moneyed interests cannot game the system.

For instance, "where an individual is the owner, partner, 10% stakeholder, etc. in a company (would need to be defined) that is, may, or has sought a public benefit (would need to be defined), that individual's campaign donation will be accrued as one in concert with the donations of all other associates (would need to be defined) of the company when determining if the max individual campaign donation has been reached."

What is a "person" to the FPPC?

For the purpose of aggregate donations, the Political Reform Act defines a "Person" as *an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, limited liability company, association, committee, and any other organization or group of persons acting in concert.*

Thus, the Fair Political Practices Commission believes that a "person," an "entity" and coordinating people and entities are one and the same when it comes to determining aggregate donations. This could be helpful in creating language to address the loophole discussed in San Diego's "people only" model.

Sincerely,
Sean McMorris
Chapter Leader, Represent Los Angeles-San Gabriel Valley



City Hall's FBI Corruption Probe Comment

1 message

Jeff Bornstein [redacted]
To: ethics.policy@lacity.org, [redacted]

Thu, Jan 31, 2019 at 9:24 AM

Hi Ethics,

Developers have every advantage over the community members inherently. Money talks even without Developers having an extra advantage if able to contribute to City Council or other elected officials who have jurisdiction over the development process. Reducing the influence of money going from the Developer to City Council campaigns is a good start to clean up the impropriety of buying elections and City Council members owing favors which turn into inappropriate developments.

As a homeowner/condo owner as well as a small business owner, I feel I have No Say over what goes on in my neighborhood. I am not on equal footing with developers who have only one interest to make money. People get involved in business to make money. Using money to make more money is what businesses are. Using money to buy influence over developments only seems natural. We need to contour those needs to get what they want to make as much as they can even if we have to invest in a candidate. That is what contributions are from Large Land Owners. It is just a good investment. Someone needs to make laws stopping this incentive available to large developers. As an individual I have little say how my community is. Stopping the practice of Developers contributing to City Council and other elected officials would help get me on a more even footing. As an individual I only have one remedy and that is through the courts. Please help me avoid the legal remedy in the future by passing a law prohibiting Developers from contributing to City Council Members.

Sincerely,
Jeff Bornstein
[redacted]

P.S. I wish I had more time to work on this. I may amend later today. What is the deadline?
Please confirm receipt.



Restrictions on Behested Payments to Charities

1 message

Ron Bitzer [REDACTED]

Thu, Jan 31, 2019 at 8:55 AM

To: ethics.policy@lacity.org

Cc: Ron Bitzer [REDACTED]

Sir or Madam,

The Los Angeles press and other centers of influence outside City Hall are taking seriously payments by special interests in the City to tax-exempt groups designated by elected and appointed officials.

Qualified charities are already subsidized by the government by virtue alone of the granting of tax-exempt status. Have any of these charities in receipt of "behested payments" compromised their tax-exempt status? Ethical standards of professional fund raising (e.g. compensation to fund raisers based on commissions and not a fixed salary)?

The lack of transparency by commercial developers with large downtown projects requiring City approval (e.g. "unable to share any information about the company's donation" *LA Times*, January 31, 2019) serves as an additional motivation for your Commission to gather more information and to restrict ways special interests make local government beholden to them.

Ron Bitzer
North Hollywood

Submitting Evidence in response to Jan 18, 2019 Press Release:

1 message

Wed, Jan 30, 2019 at 5:15 PM

To: ethics.policy@lacity.org

Please include the attachments in my email into your record and for your consideration.
Please take them seriously.
These are FACTS and they ARE HAPPENING.

What MUST be looked at in harmony with your current review is the voting system at City Hall. There is nothing ethical about 15 adults agreeing in unison, about anything. Let alone development projects that are automatically approved pending the position of the councilmember in the district.

Records from our Census repeatedly shows how more than enough housing has been made available in several of the districts. Studies are not delivering accurate reports and are all altered to imply whatever will get their projects approved. What has happened has gotten out of control. People like me have been writing to our State, to the civil grand jury, to anyone and everyone outside our city because no city department has proven to have independent judgment. No city department has proven to express concern over anything going on. As a result our city has deteriorated. WE are held accountable for parking in the red. We are asked to apply for permits and agree to inspections to add a bathroom or seek a variance for a guest house that is 4 inches over code. Developers have been given an unconditional green light to evict illegally, demolish illegally, be rewarded with project approval and to thereby build illegally. Resulting in a vacancy serving no one except for the city council's pockets.

If the commission truly believes there are problems with this, you may very well be the first city department to do something about it. And we will support you.

I think a good question to ask the Commission to ask themselves would be: How could it cause harm if it came to an end?
If anything, bringing it to an immediate halt and studying closely for one or 2 years would be an eye opener.

Many thanks.

-Jennifer Getz



17 attachments



2012-UB_CC-DavidDuel-Garcetti.png
212K

2014-UB_CC-Huizar.png

NAME	DATE	FILE	SIZE
2015_UB_CC-Englander.png	2/19/2019	2015_UB_CC-Englander.png	80K

39K

NAME	DATE	FILE	SIZE
2015_UB-EthicsCommission.png	2/19/2019	2015_UB-EthicsCommission.png	159K

2015_UB_CC-Englander.png
80K

NAME	DATE	FILE	SIZE
2016_LobbyRegistration-DanaSayles.png	2/19/2019	2016_LobbyRegistration-DanaSayles.png	88K

2015_UB-EthicsCommission.png
159K

NAME	DATE	FILE	SIZE
2016-UB-EthicsCommission.png	2/19/2019	2016-UB-EthicsCommission.png	177K

2016_LobbyRegistration-DanaSayles.png
88K

NAME	DATE	FILE	SIZE
UB_CC-CityCouncil.png	2/19/2019	UB_CC-CityCouncil.png	177K

2016-UB-EthicsCommission.png
177K

NAME	DATE	FILE	SIZE
Pay-To-Play_Special_Report_Final_March_5_.pdf	2/19/2019	Pay-To-Play_Special_Report_Final_March_5_.pdf	312K

UB_CC-CityCouncil.png
177K

 **Pay-To-Play_Special_Report_Final_March_5_.pdf**
312K

 **Lobbying Payments Received from City Agencies.pdf**
1137K

 **Lobbying Firm Quarterly Report - HH.pdf**
514K

 **SteveNazemi, DHS.pdf**
1068K

 **2015_LobbyRegistration-CourtneyShum-.pdf**
176K

 **2015_LobbyRegistration-CourtneyShum.pdf**
77K

 **2015_Sep15-LobbyRegistration-CourtneyShum.pdf**
61K

 **2016_LobbyRegistration-DanaSayles.pdf**
158K

 **2016_LobbyRegistration-ElisaPaster.pdf**
80K

 **2017_LobbyRegistration-ElisaPaster.pdf**



Ethics Commission
 200 N. Spring St., Suite 2410
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYIST REGISTRATION FORM CEC Form 30

File Information

Original

NAME OF LOBBYIST Elisa Paster	DATE QUALIFIED: Jan 01, 2016
BUSINESS ADDRESS (street address redacted)	PHONE NUMBER [REDACTED]
CITY, STATE, ZIP CODE: Los Angeles, CA 90067-5010	FAX NUMBER [REDACTED]
E-MAIL [REDACTED]	

I. Lobbyist Affiliation

- I am a LOBBYIST SOLE PROPRIETOR - an independent contract (owner) lobbyist with one or more municipal lobbying clients.
- I am an owner, partner, shareholder, officer, or employee of a LOBBYING FIRM.
- I am employed by a LOBBYIST EMPLOYER.

[Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP](#)

 Name of Lobbying Firm

II. CITY AGENCIES AUTHORIZED TO LOBBY

- I am authorized to lobby any City Agency
- I am authorized to lobby **only** the agencies identified below:

III. VERIFICATION

I have used all reasonable diligence in preparing this form. I have reviewed the form and the Lobbyist Statement of Understanding (next page) and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[06-Jan-16](#)

[Elisa Paster](#) (e-signed)

Executed On: (Date)

By: (Signature of Lobbyist)



Ethics Commission
200 N. Spring St., Suite 2410
Los Angeles, CA 90012
(213) 978-1960
ethics.lacity.org

LOBBYIST REGISTRATION FORM

CEC Form 30

Lobbyist Statement of Understanding

I HAVE READ AND UNDERSTAND THE REQUIREMENTS OF THE PROVISIONS OF LOS ANGELES MUNICIPAL CODE (LAMC) SECTIONS 48.01 ET SEQ., AS AMENDED, LAMC SECTION.49.5.10, AND LOS ANGELES CITY CHARTER SECTION 470(c)11:

LAMC Section 48.04.

No lobbyist or lobbying firm subject to the requirements of the Article shall:

- A. Do any act with the purpose and intent of placing any City official under personal obligation to the lobbyist, the lobbying firm, or to the lobbyist's or firm's employer or client.
- B. Fraudulently deceive or attempt to deceive any City official with regard to any material fact pertinent to any pending or proposed municipal legislation.
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- D. Cause any communication to be sent to any City official in the name of any non-existent person or in the name of any existing person without the consent of such person.
- E. Make or arrange for any payment to a City official, or act as an agent or intermediary in making such payments by any other person, if the arrangement or the payment would violate any provision of the City's Governmental Ethics Ordinance (L.A.M.C. Section 49.5.1 et seq.).

LAMC Section 49.5.10(A)4.

No lobbyist or lobbying firm shall make, and no City official shall accept, any gift from a lobbyist or a lobbying firm which is a restricted source as to that official.

LAMC Section 49.5.10(A)5.

No lobbyist or lobbying firm shall act as an agent or intermediary in the making of any gift by another person to any City official.

Los Angeles Charter Section 470(c)11.

No elective City officer or candidate for elective City office, nor any of his or her City controlled committees, shall solicit or accept any contribution to the officer or candidate, or to any of his or her City controlled committees, from any lobbyist or lobbying firm registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer. No person required by ordinance to be registered as a lobbyist or lobbying firm shall make any contribution to an elective City officer or candidate for elective City office, or to any of his or her City controlled committees, if the lobbyist or lobbying firm is required by ordinance to be registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer.



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 Los Angeles, CA 90012
 (213) 978-1960
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LOBBYIST REGISTRATION FORM Form 30

Filer Information

Original

NAME OF LOBBYIST Elisa Paster	DATE QUALIFIED: Jan 05, 2017
BUSINESS ADDRESS (street address redacted)	PHONE NUMBER [REDACTED]
CITY, STATE, ZIP CODE: Los Angeles, CA 90067-5010	FAX NUMBER [REDACTED]
E-MAIL epaster@glaserweil.com	

I. Lobbyist Affiliation

- I am a LOBBYIST SOLE PROPRIETOR - an independent contract (owner) lobbyist with one or more municipal lobbying clients.
- I am an owner, partner, shareholder, officer, or employee of a LOBBYING FIRM.
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I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[05-Jan-17](#)

[Elisa Paster](#) (e-signed)

Executed On: (Date)

By: (Signature of Lobbyist)



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LOBBYIST REGISTRATION FORM

Form 30

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- D. Cause any communication to be sent to any City official in the name of any non-existent person or in the name of any existing person without the consent of such person.
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 ethics.lacity.org

LOBBYIST REGISTRATION FORM Form 30

File Information

Original

NAME OF LOBBYIST Dana Sayles	DATE QUALIFIED: Jan 01, 2016
BUSINESS ADDRESS (street address redacted)	PHONE NUMBER [REDACTED]
CITY, STATE, ZIP CODE: Culver City, CA 90230	FAX NUMBER ()
E-MAIL dana@three6ixty.net	

I. Lobbyist Affiliation

- I am a LOBBYIST SOLE PROPRIETOR - an independent contract (owner) lobbyist with one or more municipal lobbying clients.
- I am an owner, partner, shareholder, officer, or employee of a LOBBYING FIRM.
- I am employed by a LOBBYIST EMPLOYER.

MAX DEVELOPMENT LLC dba three6ixty

 Name of Lobbying Firm

II. CITY AGENCIES AUTHORIZED TO LOBBY

- I am authorized to lobby any City Agency
- I am authorized to lobby **only** the agencies identified below:

III. VERIFICATION

I have used all reasonable diligence in preparing this form. I have reviewed the form and the Lobbyist Statement of Understanding (next page) and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

27-Apr-16

Dana Sayles (e-signed)

Executed On: (Date)

By: (Signature of Lobbyist)



Ethics Commission
200 N Spring Street
City Hall - 24th Floor
Los Angeles, CA 90012
(213) 978-1960
ethics.lacity.org

LOBBYIST REGISTRATION FORM

Form 30

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LAMC Section 49.5.10(A)4.

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City Ethics Commission
 200 N. Spring St., Suite 2410
 Los Angeles, CA 90012
 (213) 978-1960

LOBBYING REGISTRATION TERMINATION FORM
CEC Form 32

REGISTRATION TERMINATION FOR:

- LOBBYIST - (Lobbyist must complete Parts I and III).
- LOBBYING FIRM - (Lobbying Firm must complete Parts I, II and III).

I. FILER INFORMATION

NAME OF LOBBYIST TERMINATING Courtney Shum	
NAME OF LOBBYING FIRM OR EMPLOYER MAX DEVELOPMENT LLC dba three6ixty	
BUSINESS ADDRESS (street address redacted)	
CITY, STATE, ZIP CODE Culver City, CA 90230	PHONE NUMBER [REDACTED]
E-MAIL carolyn@three6ixty.net	
DATE QUALIFIED: Jan 01, 2015	EFFECTIVE DATE OF TERMINATION: Apr 01, 2015

II. CLIENTS

On next page(s), report each client which the firm is no longer representing in municipal lobbying activities.

III. VERIFICATION

I have used all reasonable diligence in preparing this form. I have reviewed the form and the Lobbyist Statement of Understanding (next page) and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[29-Sep-15](#) [Courtney Shum](#) (e-signed)

Executed On: (Date) By: (Signature of Lobbyist)



Ethics Commission
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 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYIST REGISTRATION FORM

File Information

Amendment 1

NAME OF LOBBYIST Courtney Shum	DATE QUALIFIED: Mar 01, 2014
BUSINESS ADDRESS (street address redacted)	PHONE NUMBER [REDACTED]
CITY, STATE, ZIP CODE: Culver City, CA 90230	FAX NUMBER ()
E-MAIL courtney@three6ixty.net	

I. Lobbyist Affiliation

- I am a LOBBYIST SOLE PROPRIETOR - an independent contract (owner) lobbyist with one or more municipal lobbying clients.
- I am an owner, partner, shareholder, officer, or employee of a LOBBYING FIRM.
- I am employed by a LOBBYIST EMPLOYER.

[MAX DEVELOPMENT LLC dba three6ixty](#)

 Name of Lobbying Firm

II. CITY AGENCIES AUTHORIZED TO LOBBY

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III. VERIFICATION

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I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[23-Apr-15](#)

[Courtney Shum](#) (e-signed)

Executed On: (Date)

By: (Signature of Lobbyist)



Ethics Commission
200 N Spring Street
City Hall - 24th Floor
Los Angeles, CA 90012
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ethics.lacity.org

LOBBYIST REGISTRATION FORM

Lobbyist Statement of Understanding

I HAVE READ AND UNDERSTAND THE REQUIREMENTS OF THE PROVISIONS OF LOS ANGELES MUNICIPAL CODE (LAMC) SECTIONS 48.01 ET SEQ., AS AMENDED, LAMC SECTION.49.5.10, AND LOS ANGELES CITY CHARTER SECTION 470(c)11:

LAMC Section 48.04.

No lobbyist or lobbying firm subject to the requirements of the Article shall:

- A. Do any act with the purpose and intent of placing any City official under personal obligation to the lobbyist, the lobbying firm, or to the lobbyist's or firm's employer or client.
- B. Fraudulently deceive or attempt to deceive any City official with regard to any material fact pertinent to any pending or proposed municipal legislation.
- C. Cause or influence the introduction of any municipal legislation for the purpose of thereafter being employed or retained to secure its passage or defeat.
- D. Cause any communication to be sent to any City official in the name of any non-existent person or in the name of any existing person without the consent of such person.
- E. Make or arrange for any payment to a City official, or act as an agent or intermediary in making such payments by any other person, if the arrangement or the payment would violate any provision of the City's Governmental Ethics Ordinance (L.A.M.C. Section 49.5.1 et seq.).

LAMC Section 49.5.10(A)4.

No lobbyist or lobbying firm shall make, and no City official shall accept, any gift from a lobbyist or a lobbying firm which is a restricted source as to that official.

LAMC Section 49.5.10(A)5.

No lobbyist or lobbying firm shall act as an agent or intermediary in the making of any gift by another person to any City official.

Los Angeles Charter Section 470(c)11.

No elective City officer or candidate for elective City office, nor any of his or her City controlled committees, shall solicit or accept any contribution to the officer or candidate, or to any of his or her City controlled committees, from any lobbyist or lobbying firm registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer. No person required by ordinance to be registered as a lobbyist or lobbying firm shall make any contribution to an elective City officer or candidate for elective City office, or to any of his or her City controlled committees, if the lobbyist or lobbying firm is required by ordinance to be registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer.

 Ethics Commission 200 N Spring Street City Hall - 24th Floor Los Angeles, CA 90012 (213) 978-1960 ethics.lacity.org		LOBBYIST REGISTRATION FORM	
Filer Information		Amendment 1	
NAME OF LOBBYIST Courtney Shum		DATE QUALIFIED: Mar 01, 2014	
BUSINESS ADDRESS (street address redacted)		PHONE NUMBER [REDACTED]	
CITY, STATE, ZIP CODE: Culver City, CA 90230		FAX NUMBER ()	
E-MAIL courtney@three6ixty.net			
I. Lobbyist Affiliation			
<input type="checkbox"/> I am a LOBBYIST SOLE PROPRIETOR - an independent contract (owner) lobbyist with one or more municipal lobbying clients. <input checked="" type="checkbox"/> I am an owner, partner, shareholder, officer, or employee of a LOBBYING FIRM. <input type="checkbox"/> I am employed by a LOBBYIST EMPLOYER. MAX DEVELOPMENT LLC dba three6ixty Name of Lobbying Firm			
II. CITY AGENCIES AUTHORIZED TO LOBBY			
<input checked="" type="checkbox"/> I am authorized to lobby any City Agency <input type="checkbox"/> I am authorized to lobby only the agencies identified below: _____			
III. VERIFICATION			
I have used all reasonable diligence in preparing this form. I have reviewed the form and the Lobbyist Statement of Understanding (next page) and to the best of my knowledge the information contained herein is true and complete.			
I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.			
23-Apr-15		Courtney Shum (e-signed)	

 Ethics Commission 200 N Spring Street City Hall - 24th Floor Los Angeles, CA 90012 (213) 978-1960 ethics.lacity.org		LOBBYIST REGISTRATION FORM	
Lobbyist Statement of Understanding			
I HAVE READ AND UNDERSTAND THE REQUIREMENTS OF THE PROVISIONS OF LOS ANGELES MUNICIPAL CODE (LAMC) SECTIONS 48.01 ET SEQ., AS AMENDED, LAMC SECTION.49.5.10, AND LOS ANGELES CITY CHARTER SECTION 470(c)11:			
LAMC Section 48.04.			
No lobbyist or lobbying firm subject to the requirements of the Article shall:			
A. Do any act with the purpose and intent of placing any City official under personal obligation to the lobbyist, the lobbying firm, or to the lobbyist's or firm's employer or client. B. Fraudulently deceive or attempt to deceive any City official with regard to any material fact pertinent to any pending or proposed municipal legislation. C. Cause or influence the introduction of any municipal legislation for the purpose of thereafter being employed or retained to secure its passage or defeat. D. Cause any communication to be sent to any City official in the name of any non- existent person or in the name of any existing person without the consent of such person. E. Make or arrange for any payment to a City official, or act as an agent or intermediary in making such payments by any other person, if the arrangement or the payment would violate any provision of the City's Governmental Ethics Ordinance (L.A.M.C. Section 49.5.1 et seq.).			
LAMC Section 49.5.10(A)4.			
No lobbyist or lobbying firm shall make, and no City official shall accept, any gift from a lobbyist or a lobbying firm which is a restricted source as to that official.			
LAMC Section 49.5.10(A)5.			
No lobbyist or lobbying firm shall act as an agent or intermediary in the making of any gift by another person to any City official.			
Los Angeles Charter Section 470(c)11.			
No elective City officer or candidate for elective City office, nor any of his or her City controlled committees, shall solicit or accept any contribution to the officer or candidate, or to any of his or her City controlled committees, from any lobbyist or lobbying firm registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer. No person required by ordinance to be registered as a lobbyist or lobbying firm shall make any contribution to an elective City officer or candidate for elective City office, or to any of his or her City controlled committees, if the lobbyist or lobbying firm is required by ordinance to be registered to lobby the City office for which the candidate is seeking election, or the current City office, commission, department, bureau or agency of the candidate or officer.			

http://ethics.lacity.org/disclosure/index.cfm?fuseaction=home.view&DOCUMENT_ID=37338

Entitlement Applications Received by Department of City Planning 03/09/2014 to 03/22/2014

Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
03/13/2014	DIR-2014-850-DB	6844 N WOODMAN AVE 91405	2	Van Nuys - North Sherman Oaks	CONSTRUCTION OF A THREE STORY (WITH ROOF DECK) APARTMENT TO CONTAIN 14 MARKET RATE UNITS AND ONE VERY LOW INCOME UNIT	DB-DENSITY BONUS	YONATAN RABIN, TELLUS LLC
03/13/2014	ENV-2014-848-CE	6844 N WOODMAN AVE 91405	2	Van Nuys - North Sherman Oaks	CONSTRUCTION OF A THREE STORY (WITH ROOF DECK) APARTMENT TO CONTAIN 14 MARKET RATE UNITS AND ONE VERY LOW INCOME UNIT	CE-CATEGORICAL EXEMPTION	YONATAN RABIN, TELLUS LLC

CNC Records: 2

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
03/17/2014	DIR-2014-903-DB	5044 N BAKMAN AVE 91601	2	North Hollywood - Valley Village	46 RESIDENTIAL UNITS WITH 4 UNITS SET ASIDE	DB-DENSITY BONUS	FRED FARZAN, BAKMAN PROPERTIES, LLC
03/17/2014	ENV-2014-902-EAF	5044 N BAKMAN AVE 91601	2	North Hollywood - Valley Village	46 RESIDENTIAL UNITS WITH 4 UNITS SET ASIDE	EAF-ENVIRONMENTAL ASSESSMENT	FRED FARZAN, BAKMAN PROPERTIES, LLC
03/14/2014	ENV-2014-880-EAF	5131 N CARTWRIGHT AVE 91601	2	North Hollywood - Valley Village	VESTING TENTATIVE TRACT MAP	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI ψ
03/14/2014	VTT-72782-SL	5131 N CARTWRIGHT AVE 91601	2	North Hollywood - Valley Village	VESTING TENTATIVE TRACT MAP	SL-SMALL LOT SUBDIVISION	STEVE NAZEMI ψ
03/14/2014	ZA-2014-881-ZV-ZAA	5131 N CARTWRIGHT AVE 91601	2	North Hollywood - Valley Village	VESTING TENTATIVE TRACT MAP	ZV-ZONE VARIANCE	STEVE NAZEMI ψ

CNC Records: 5

Entitlement Applications Received by Department of City Planning 11/02/2014 to 11/15/2014

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
11/07/2014	DIR-2014-4184-DB	11111 W CUMPSTON ST 91601	2	North Hollywood - Valley Village	DEMOLISH 3 EXISTING SFD AND REPLACE WITH A 46 UNIT APARTMENT BUILDING.	DB-DENSITY BONUS	STEVE NAZEMI [REDACTED] ψ
11/07/2014	ENV-2014-4185-EAF	11111 W CUMPSTON ST 91601	2	North Hollywood - Valley Village	DEMOLISH 3 EXISTING SFD AND REPLACE WITH A 46 UNIT APARTMENT BUILDING.	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI [REDACTED]

CNC Records: 2

Certified Neighborhood Council -- North Hollywood West							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
11/07/2014	ENV-2014-4193-EAF	7945 N COLDWATER CANYON AVE 91605	2	Sun Valley - La Tuna Canyon	SIX (6) OT SUBDIVISION	EAF-ENVIRONMENTAL ASSESSMENT	HAYK MARTIROSIAN - TECHNA LAND CO. INC. [REDACTED]
11/07/2014	TT-72966	7945 N COLDWATER CANYON AVE 91605	2	Sun Valley - La Tuna Canyon	SIX (6) OT SUBDIVISION		HAYK MARTIROSIAN - TECHNA LAND CO. INC. [REDACTED]

CNC Records: 2

Entitlement Applications Received by Department of City Planning 11/30/2014 to 12/13/2014

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
12/02/2014	DIR-2014-4492-DB-SPR	5513 N CASE AVE 91601	2	North Hollywood - Valley Village	DEMOLITION OF EXISTING DWELLING UNITS AND CONSTRUCTION OF A NEW 90 UNIT APARTMENT BUILDING.	DB-DENSITY BONUS	STEVE NAZEMI ψ
12/02/2014	ENV-2014-4493-EAF	5513 N CASE AVE 91601	2	North Hollywood - Valley Village	DEMOLITION OF EXISTING DWELLING UNITS AND CONSTRUCTION OF A NEW 90 UNIT APARTMENT BUILDING.	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI
12/11/2014	ENV-2014-4604-EAF	11120 W CHANDLER BLVD 91601	2	North Hollywood - Valley Village	PROPOSED MIXED-USE PROJECT WITH 329 DWELLING UNITS AND 4,500 SF. OF COMMERCIAL WITHIN TWO 5-STORY BUILDINGS.	EAF-ENVIRONMENTAL ASSESSMENT	TAREK SHAER
12/11/2014	ZA-2014-4603-ZAA-SPR	11120 W CHANDLER BLVD 91601	2	North Hollywood - Valley Village	PROPOSED MIXED-USE PROJECT WITH 329 DWELLING UNITS AND 4,500 SF. OF COMMERCIAL WITHIN TWO 5-STORY BUILDINGS.	ZAA-AREA HEIGHT, YARD, AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)	TAREK SHAER
12/02/2014	DIR-2014-4487-DB	5532 N FULCHER AVE 91601	2	North Hollywood - Valley Village	DEMOLITION OF EXISTING 5 DWELLING UNITS AND CONSTRUCTION OF NEW 36 UNIT APARTMENT.	DB-DENSITY BONUS	STEVE NAZEMI ψ
12/02/2014	ENV-2014-4488-EAF	5532 N FULCHER AVE 91601	2	North Hollywood - Valley Village	DEMOLITION OF EXISTING 5 DWELLING UNITS AND CONSTRUCTION OF NEW 36 UNIT APARTMENT.	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI

CNC Records: 6

http://cityplanning.lacity.org/cncrpts/dsp_viewFileDetail.cfm?filename=304

Entitlement Applications Received by Department of City Planning 07/12/2015 to 07/25/2015

Certified Neighborhood Council -- Mid-Town North Hollywood						
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type
07/21/2015	DIR-2015-2676-DB-SPR	5101 N LANKERSHIM BLVD 91601	2	North Hollywood - Valley Village	DENSITY BONUS AND SITE PLAN REVIEW - MIXED USE PROJECT W/297 DWELLING UNITS AND APPROX. 25,000 SF RETAIL	DB-DENSITY BONUS
						CHRISTOPHER MURRAY C/O ROSENHEIM & ASSOCIATES, INC.
07/21/2015	ENV-2015-2677-EAF	5101 N LANKERSHIM BLVD 91601	2	North Hollywood - Valley Village	DENSITY BONUS AND SITE PLAN REVIEW - MIXED USE PROJECT W/297 DWELLING UNITS AND APPROX. 25,000 SF RETAIL	EAF-ENVIRONMENTAL ASSESSMENT
						CHRISTOPHER MURRAY C/O ROSENHEIM & ASSOCIATES, INC.

Certified Neighborhood Council -- Sun Valley						
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type
07/22/2015	AA-2015-2685-PMEX	8600 N GLENOAKS BLVD 91352	2	Sun Valley - La Tuna Canyon	A LOT LINE ADJUSTMENT BETWEEN PARCEL "1" (LOTS 39, 40, 45 OF TRACT NO. 482) AND PARCEL "2" (LOT 46 OF TRACT 482).	PMEX-PARCEL MAP EXEMPTION
						ERIC LIEBERMAN
07/22/2015	DIR-2015-2686-CLQ	8600 N GLENOAKS BLVD 91352	2	Sun Valley - La Tuna Canyon	PURSUANT TO LAMC SECTION 12.32-H, A CLARIFICATION OF THE Q CONDITION TO MODIFY THE SITE PLAN (CONDITION A.2) AND CLARIFY CONDITION A.3.	CLQ-CLARIFICATION OF 'Q' CONDITIONS
						ERIC LIEBERMAN
07/22/2015	ENV-2015-2687-CE	8600 N GLENOAKS BLVD 91352	2	Sun Valley - La Tuna Canyon	PURSUANT TO LAMC SECTION 12.32-H, A CLARIFICATION OF THE Q CONDITION TO MODIFY THE SITE PLAN (CONDITION A.2) AND CLARIFY CONDITION A.3.	CE-CATEGORICAL EXEMPTION
						ERIC LIEBERMAN

Certified Neighborhood Council -- Valley Village						
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type
07/22/2015	DIR-2015-2697-SPP	12300 W WEDDINGTON ST 91607	2	North Hollywood - Valley Village	SMALL LOT SUBDIVISION OF 28-UNITS WITH 2 PARKING SPACES PER UNIT AND 7 GUEST PARKING SPACES (TOTAL OF 63 PARKING SPACES) OF VTT 73704 AND MERGER OF ADJACENT STREET	SPP-SPECIFIC PLAN PROJECT PERMIT COMPLIANCE
						STEVE NAZEMI, DHS ASSOCIATES, INC.
07/13/2015	ENV-2015-2618-EAF	12300 W WEDDINGTON ST 91607	2	North Hollywood - Valley Village	28-UNITS WITH 2 PARKING SPACES PER UNIT AND 7 GUEST PARKING SPACES (TOTAL OF 63 PARKING SPACES)	EAF-ENVIRONMENTAL ASSESSMENT
						STEVE NAZEMI, UB VALLEY VILLAGE LLC AND EDWARDS TRUST
07/13/2015	VTT-73704-SL	12300 W WEDDINGTON ST 91607	2	North Hollywood - Valley Village	28-UNITS WITH 2 PARKING SPACES PER UNIT AND 7 GUEST PARKING SPACES (TOTAL OF 63 PARKING SPACES)	SL-SMALL LOT SUBDIVISION
						STEVE NAZEMI, UB VALLEY VILLAGE LLC AND EDWARDS TRUST

CNC Records: 3

Entitlement Applications Received by Department of City Planning 09/20/2015 to 10/03/2015

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
10/02/2015	ENV-2015-3615-EAF	11757 W HAMLIN ST 91606	2	North Hollywood - Valley Village	NEW 10-LOT SMALL-LOT SUBDIVISION	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI - DHS & ASSOCIATES INC. Ψ
10/02/2015	VTT-73835-SL	11757 W HAMLIN ST 91606	2	North Hollywood - Valley Village	NEW 10-LOT SMALL-LOT SUBDIVISION	SL-SMALL LOT SUBDIVISION	STEVE NAZEMI - DHS & ASSOCIATES INC.
09/22/2015	AA-2015-3466-PMEX	5616 N LANKERSHIM BLVD 91601	2	North Hollywood - Valley Village	LOT LINE ADJUSTMENT INVOLVING 4 PARCELS	PMEX-PARCEL MAP EXEMPTION	MARIA DELGADILLO
09/24/2015	ENV-2015-3498-EAF	11011 W OTSEGO ST 91601	2	North Hollywood - Valley Village	NEW PROPOSED 144 APARTMENT UNITS (INCLUDING 20 DENSITY BONUS UNITS), AND TWO LEVEL SUBTERRANEAN PARKING GARAGE OF 225 PARKING SPACES.	EAF-ENVIRONMENTAL ASSESSMENT	RONALD C MAYHEW
09/24/2015	ZA-2015-3499-DB-SPR	11011 W OTSEGO ST 91601	2	North Hollywood - Valley Village	NEW PROPOSED 144 APARTMENT UNITS (INCLUDING 20 DENSITY BONUS UNITS), AND TWO LEVEL SUBTERRANEAN PARKING GARAGE OF 225 PARKING SPACES.	DB-DENSITY BONUS	RONALD C MAYHEW

CNC Records: 5

09/22/2015	AA-2015-3479-PMLA-ZO	7707 N ETHEL AVE 91605	2	Sun Valley - La Tuna Canyon	3-LOT PARCEL MAP WITH ZONE CHANGE AND ADJUSTMENTS.	PMLA-PARCEL MAP	OSCAR ENSAFI, APPROVED PLANS, INC.
09/22/2015	ENV-2015-3478-EAF	7707 N ETHEL AVE 91605	2	Sun Valley - La Tuna Canyon	3-LOT PARCEL MAP WITH ZONE CHANGE AND ADJUSTMENTS.	EAF-ENVIRONMENTAL ASSESSMENT	OSCAR ENSAFI, APPROVED PLANS, INC.

CNC Records: 2

Entitlement Applications Received by Department of City Planning 10/04/2015 to 10/17/2015

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
10/07/2015	ENV-2015-3665-CE	6439 N LANKERSHIM BLVD 91606	2	North Hollywood - Valley Village	RUSTY'S HACIENDA (AKA: HACIENDA DEL SOL CLUB 2000; CLUB ACCESS)(CNAP)- POSSIBLE REVOCATION PROCEEDINGS	CE-CATEGORICAL EXEMPTION	ZONING ADMINISTRATION [REDACTED]
10/13/2015	ENV-2015-3721-EAF	5617 N STROHM AVE 91601	2	North Hollywood - Valley Village	VTT 73907SL18-UNITS SMALL-LOT SUBDIVISION WITH 2 PARKING SPACES PER UNIT AND 3 GUEST PARKING SPACES (TOTAL OF 35 PARKING SPACES) WITHIN THE [QJR3-1 ZONE.	EAF-ENVIRONMENTAL ASSESSMENT	H. STEVE NAZEMI, DHS & ASSOCIATES, INC. [REDACTED] Ψ
10/13/2015	VTT-73907-SL	5617 N STROHM AVE 91601	2	North Hollywood - Valley Village	VTT 73907SL18-UNITS SMALL-LOT SUBDIVISION WITH 2 PARKING SPACES PER UNIT AND 3 GUEST PARKING SPACES (TOTAL OF 35 PARKING SPACES) WITHIN THE [QJR3-1 ZONE.	SL-SMALL LOT SUBDIVISION	H. STEVE NAZEMI, DHS & ASSOCIATES, INC. [REDACTED]

CNC Records: 3

Entitlement Applications Received by Department of City Planning 11/01/2015 to 11/14/2015

Certified Neighborhood Council -- Mid-Town North Hollywood							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
11/10/2015	DIR-2015-4123-DB	11110 W HARTSOOK ST 91601	2	North Hollywood - Valley Village	5-STORY 61,793 S.F. 61-UNIT MULTI-FAMILY BUILDING IN THE R4-1VL ZONE.	DB-DENSITY BONUS	DANIEL AHADJIAN
11/10/2015	ENV-2015-4124-EAF	11110 W HARTSOOK ST 91601	2	North Hollywood - Valley Village	5-STORY 61,793 S.F. 61-UNIT MULTI-FAMILY BUILDING IN THE R4-1VL ZONE.	EAF-ENVIRONMENTAL ASSESSMENT	DANIEL AHADJIAN
11/12/2015	DIR-2006-6025-RV-PA2	6439 N LANKERSHIM BLVD 91606	2	North Hollywood - Valley Village	PLAN APPROVAL FOR REVIEW OF CONDITIONS PER CONDITION NO. 8	RV-REVOCAION	()
11/12/2015	ENV-2015-4151-CE	6439 N LANKERSHIM BLVD 91606	2	North Hollywood - Valley Village	RUSTY'S HACIENDA (AKA: HACIENDA DEL SOL CLUB 2000; CLUB ACCESS)(GNAP)- POSSIBLE REVOCAION PROCEEDINGS	CE-CATEGORICAL EXEMPTION	ZONING ADMINISTRATION
11/13/2015	ENV-2015-4171-EAF	11306 W VICTORY BLVD 91606	2	North Hollywood - Valley Village	11-UNITS SMALL-LOT SUBDIVISION WITH 2 PARKING SPACES PER UNIT AND 1 GUEST PARKING SPACES (TOTAL OF 23 PARKING SPACES) WITHIN THE [QJR3-1 ZONE.	EAF-ENVIRONMENTAL ASSESSMENT	STEVE NAZEMI, DHS & ASSOCIATES, INC. Ψ
11/13/2015	VTT-73927-SL	11306 W VICTORY BLVD 91606	2	North Hollywood - Valley Village	11-UNITS SMALL-LOT SUBDIVISION WITH 2 PARKING SPACES (TOTAL OF 23 PARKING SPACES) WITHIN THE [QJR3-1 ZONE.	SL-SMALL LOT SUBDIVISION	STEVE NAZEMI, DHS & ASSOCIATES, INC.

CNC Records: 6

Certified Neighborhood Council -- Studio City							
Application Date	Case Number	Address	CD#	Community Plan Area	Project Description	Request Type	Applicant Contact
11/09/2015	DIR-2015-4094-SPP	11288 W VENTURA BLVD 91604	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	VENTURA-CAHUENGA BOULEVARD CORRIDOR SPECIFIC PLAN -- PROJECT PERMIT COMPLIANCE FOR CHANGE OF USE	SPP-SPECIFIC PLAN PROJECT PERMIT COMPLIANCE	MARY ANNE DE CONCEICAO
11/09/2015	ENV-2015-4095-CE	11288 W VENTURA BLVD 91604	2	Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass	VENTURA-CAHUENGA BOULEVARD CORRIDOR SPECIFIC PLAN -- PROJECT PERMIT COMPLIANCE FOR CHANGE OF USE	CE-CATEGORICAL EXEMPTION	MARY ANNE DE CONCEICAO (3)

SEARCH > Search Lobbying Firm/Employer Registrations

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Firm/Employer	Clients	Lobbyists	City Agencies
Planning Associates, Inc. Studio City, CA 91604 2017 Registration (01/09/17-12/31/17)	Archdiocese of Los Angeles EMC Capital Investments Group, LLC GME Development Goldstein, James Hollenbeck Palms Horace Heidt Agency Company, Inc. Julia & David Properties, Inc. Kaiser Permanente MBL Narcisus, LLC MBL Sperry, LLC Mirkin, Margaux Pacific Properties Group Raider Planning & Construction, Inc. Senior Resource Group Shapell Liberty Investment Properties, LLC Toll Brothers	Allen, Jeffrey Concepcion, Allen Stemnock, Tom	Clients authorized to lobby: City Council Building and Safety Planning, City Public Works, Engineering Public Works, Street Services Recreation & Parks Transportation (LADOT, DOT) Lobbyists authorized to lobby: ANY CITY AGENCY
			Total Firms: 1 Total Firm Registrations : 1

(Data available from 1st Quarter of 2003)

Disclaimer: EFS data is input by lobbyists. The Commission does not amend information to edit variations in spelling, punctuation, use of abbreviations or inaccuracies. Therefore, search results may not be 100% accurate.

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Firm/Employer	Clients	Lobbyists	City Agencies
Planning Associates, Inc. Studio City, CA 91604 2016 Registration (01/05/16-12/31/16)	Archdiocese of Los Angeles EMC Capital Investments Group, LLC GME Development Goldstein, James Horace Heidt Agency Company, Inc. Julia & David Properties, Inc. Kaiser Permanente MBL Narcisus, LLC MBL Sperry, LLC Mirkin, Margaux Pacific Properties Group PlainJoe Studios on behalf of Shepherd Church Senior Resource Group Shapell Liberty Investment Properties, LLC Shea Properties Management Co., Inc. Toll Brothers Weddington Golf and Tennis, LLC	Concepcion, Allen Stemnock, Tom	Clients authorized to lobby: City Council Building and Safety Planning, City Public Works, Engineering Public Works, Street Services Transportation (LADOT, DOT) Lobbyists authorized to lobby: ANY CITY AGENCY
Total Firms: 1			Total Firm Registrations : 1

(Data available from 1st Quarter of 2003)

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SEARCH > Search Lobbying Firm/Employer Registrations

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Firm/Employer	Clients	Lobbyists	City Agencies
Planning Associates, Inc. Studio City, CA 91604 2015 Registration (01/06/15-12/31/15)	AF Gilmore Company Archdiocese of Los Angeles Bhansali, Samir EMC Capital Investments Group, LLC Horace Heidt Agency Company, Inc. Julia & David Properties, Inc. Kaiser Permanente MBL Narcisus, LLC MBL Sperry, LLC Presser, Trudy Roll Properties International, Inc. Senior Resource Group Shapell Liberty Investment Properties, LLC Shea Properties Management Co., Inc. Spyder Aviation, LLC Toll Brothers Weddington Golf and Tennis, LLC Wilshire Gayley, LLC	Stemnock, Tom	<p>Clients authorized to lobby: City Council Building and Safety General Services Planning, City Public Works, Engineering Recreation & Parks Transportation (LADOT, DOT)</p> <p>Lobbyists authorized to lobby: ANY CITY AGENCY</p>
			<p align="right">Total Firms: 1 Total Firm Registrations : 1</p>

(Data available from 1st Quarter of 2003)

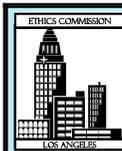
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Ethics Commission
 200 N Spring Street
 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYING FIRM QUARTERLY REPORT
 Planning Associates, Inc.
 FOR THE CALENDAR QUARTER ENDING **Dec 31, 2015**

Client Name and Contact Info	Total Payments
HORACE HEIDT AGENCY COMPANY, INC. 14155 Magnolia Boulevard Sherman Oaks, CA 91423 (818) 784-8211	\$2,350.00

Municipal Legislation / Projects			
Description	Reference Number(s)	City Agencies Lobbied	Project-related Amount
Zone Change; Density Bonus of 35%/14261 West Magnolia Boulevard Zone Change from [Q]R1-1 to [Q]RD1.5-1; Density Bonus of 35%; 14261 West Magnolia Boulevard	APCSV-2015-2554-ZC; ENV-2015-2555-EAF	City Council (incl. Districts and Committees); Planning, City	\$2,350.00

Client Name and Contact Info	Total Payments
JULIA & DAVID PROPERTIES, INC. 3550 Wilshire Boulevard, Suite 310 Los Angeles, CA 90010 (213) 364-6888	\$600.00

Municipal Legislation / Projects			
Description	Reference Number(s)	City Agencies Lobbied	Project-related Amount
Application to permit an approximately 87-unit Apartment Hotel/3242-3250 West 8th Street		Planning, City	\$600.00

Client Name and Contact Info	Total Payments
KAISER PERMANENTE 393 East Walnut Street, 4th Floor Pasadena, CA 91188 (626) 405-5385	\$300.00

Municipal Legislation / Projects			
Description	Reference Number(s)	City Agencies Lobbied	Project-related Amount
Amendment to Approval of Plans / Master Sign Program, South Campus/8120 Woodman Avenue	CPC-2001-3946-CU-SPR-YV-ZAA	Building and Safety	\$0.00
Proposed Campus Signage Plan/25820 South Normandie Avenue	CPC-2006-4722-CU-ZV-ZAD-SPR-PA2	No agencies lobbied this quarter	\$0.00
Site Plan Review of replacement hospital/25820 South Normandie Avenue	DIR 2010-1410-SPR	Planning, City	\$300.00

Client Name and Contact Info	Total Payments
MBL NARCISUS, LLC 2550 Overland Avenue, Suite 200 Los Angeles, CA 90064 (310) 559-1112	\$187.50

Municipal Legislation / Projects			
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Ethics Commission
 200 N Spring Street
 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYING FIRM REGISTRATION FORM Form 31

Agencies to be lobbied on behalf of the client City Council; Planning, City	Municipal Legislation / Projects (1) Zone Change; Density Bonus/14261 West Magnolia Boulevard [APCS-2015-2554-VZC; ENV-2015-2555-MND] Zone Change from [Q]R1-1 to [Q]RD1.5-1; 14261 West Magnolia Boulevard
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NAME OF CLIENT: Julia & David Properties, Inc.	REPRESENTATION BEGINS: Jan 09, 2017	REPRESENTATION ENDS: Dec 31, 2017
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CLIENT ADDRESS: (Number and Street)
 (street address redacted)

CITY, STATE, ZIP CODE: Los Angeles, CA 90021	TELEPHONE NUMBER: (213) 364-6888
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Agencies to be lobbied on behalf of the client Planning, City	Municipal Legislation / Projects (1) Application to permit an approximate 87-unit Apartment Hotel/3242-3250 West 8th Street [ENV-2016-2995-EAF; ZA-2016-2994-ZV-CU-ZAA-SPR]
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NAME OF CLIENT: Kaiser Permanente	REPRESENTATION BEGINS: Jan 30, 2017	REPRESENTATION ENDS: Dec 31, 2017
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CLIENT ADDRESS: (Number and Street)
 (street address redacted)

CITY, STATE, ZIP CODE: Pasadena, CA 91188	TELEPHONE NUMBER: (626) 405-5385
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Agencies to be lobbied on behalf of the client City Council; Planning, City	Municipal Legislation / Projects (1) Plan Approval to Conditional Use Permit, CPC-1991-137-CUZ /11666 West Sherman Way [CPC-1991-137-CUZ] Plan Approval to Conditional Use Permit, CPC-1991-137-CUZ to permit the construction of a 230 space parking structure, 80,000 sq. ft. laboratory building, demolish a 121,000 sq. ft. laboratory building, and add a 40,000 sq. ft. laboratory building (2) Vesting Tentative Tract Map/4867 Sunset Boulevard [VTT-74846] Vesting Tentative Tract Map (3) Vesting Tentative Tract Map/4950 Sunset Boulevard [VTT-74847] Vesting Tentative Tract Map (4) Vesting Tentative Tract Map/1345 Vermont Avenue [VTT-74848] Vesting Tentative Tract Map (5) Vesting Tentative Tract Map/765 West College Street [VTT-74849] Vesting Tentative Tract Map
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NAME OF CLIENT: MBL Narcisus, LLC	REPRESENTATION BEGINS: Jan 17, 2017	REPRESENTATION ENDS: Dec 31, 2017
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CLIENT ADDRESS: (Number and Street)
 (street address redacted)

CITY, STATE, ZIP CODE: Los Angeles, CA 90064	TELEPHONE NUMBER: (310) 559-1112
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SEARCH > Search Lobbyist Payments from City Agencies**Lobbying Payments Received from City Agencies:** (<< New Search | << Main Menu)

[Print | Close]

Quarter▲▼	Firm/Lobbyist▲▼	City Agency▲▼	Contract Number ▲▼	Contract Description ▲▼	Services Description ▲▼	Amount▲▼
Q3 2007	Adi Liberman and Associates	CD 03	28 0810028U001 AE7280064P	Services for Rio de Los Angeles State Park Celebration	Planned and implemented grand opening activities including community and media outreach and a grand opening ceremony. Oversaw a coordinating team of state and local agencies.	\$18,000.00
Q2 2003	Allen Matkins Leck Gamble Mallory & Natsis LLP	City Attorney, Office of	DA-3716 Resolution 2187	Special legal counsel to assist the City ATorney w/ legal issues related to contract and real estate law in connection w/ DFS Group, LP.	see above	\$90,520.00
Q3 2007	Bingham McCutchen, LLP	Water & Power (DWP)		Transactional energy matters	Legal services	\$129,206.00
Q2 2007	Bingham McCutchen, LLP	Public Works, Sanitation		Kern County Biosolids Initiative	Legal services	\$32,123.00
Q4 2007	Bingham McCutchen, LLP	Water & Power (DWP)		Transactional energy matters	Legal services	\$481,811.14
Q2 2007	Bingham McCutchen, LLP	Water & Power (DWP)		Transactional energy matters	Legal services	\$225,637.54
Q1 2007	Bingham McCutchen, LLP	City Attorney, Office of	C-110281	Litigation against Kern County involving biosolids and matters relating to the DWP's "Green Line"	Legal services	\$343,836.00
Q3 2004	Butterfield Communications/Baglietto, Lou	Port of LA (POLA)	2306	Contractor-URS Subcontractor-MBI Media Grade Separations Avalon/Neptune	Community Outreach, public forum facilitation	\$112.50
Q3 2006	Butterfield Communications/Baglietto, Lou	Port of LA (POLA)		Subcontractor to SAIC	Environmental Management Department Outreach Services	\$80.00
Q4 2004	Butterfield Communications/Butterfield, Gwen	Harbor (Port of LA, POLA)		Transportation masterplan South Wilmington Grade Separations	Facilitation of Public Outreach meetings	\$450.00
Q3 2004	Butterfield Communications/Butterfield, Gwen	Port of LA (POLA)	2306	Contractor-URS Corp. Subcontractor-MBI Media POLA Grade Separation Avalon/Neptune	Community Outreach, public forum facilitation	\$1,475.00
Q3 2006	Butterfield Communications/Butterfield, Gwen	Port of LA (POLA)		Subcontractor to SAIC	Einvironmental Management Department Outreach Services	\$550.00
Q2 2006	Butterfield Communications	Port of LA (POLA)		Suncontractor to SAIC- Environmental Improvement Program	Community Outreach	\$7,025.00
Q1 2007	Butterfield Communications	Port of LA (POLA)		Subcontractor to Shaw E & I for Environmental Management Program	Pass through to MBI Media, Inc for Outreach Services	\$7,106.50
Q3 2006	Butterfield Communications	Port of LA (POLA)		Port contract with Shaw Environmental.	Environmental Management Department Outreach Ser	\$42,757.75

http://ethics.lacity.org/disclosure/index.cfm?showreport=yes&layoutstyle=pf&showall=yes&SHOWREPORT=Search%20Now%20%3D%3D%3E&FUSESSION=... 1/4

				Intermediary to MBI Media for \$41,964.		
Q1 2006	Butterfield Communications	Port of LA (POLA)		EIP Project-Suncontractor to SAIC	Outreach/Communication Strategy	\$7,637.50
Q3 2005	Butterfield Communications	Port of LA (POLA)		Environmental Initiatives Program	Subcontractor to both SAIC & Shae E & I	\$5,087.50
Q4 2004	Butterfield Communications	Harbor (Port of LA, POLA)		Community Outreach Transportation Master Plan	Facilitate Public Outreach Meetings	\$612.61
Q4 2006	Butterfield Communications	Port of LA (POLA)		Environmental Division, Subcontractor to Shaw Environmental, Pass-through to MBI Media.	Outreach Consulting	\$21,207.00
Q3 2004	Butterfield Communications	Port of LA (POLA)	2306	Port of Los Angeles Contractor-URS Corp. Subcontractor-MBI Media	Community Outreach, Public Forum Facilitation	\$5,527.94
Q3 2006	Butterfield Communications	Port of LA (POLA)		Subcontractor to SAIC	Environmental Management Department Outreach Services	\$1,925.00
Q1 2005	Butterfield Communications	Port of LA (POLA)		Subcontractor to URS through MBI Media for South Wilmington Grade Separations design project.	Community Outreach services	\$4,819.46
Q4 2005	Butterfield Communications	Port of LA (POLA)		Subcontractor to SAIC on Environmental Initiatives Program	Community Outreach, Issue research	\$1,025.00
Q2 2009	California Strategies and Advocacy LLC	Harbor (Port of LA, POLA)	E6362	Strategic consulting, communications, crisis communications, legislative and regulatory advocacy	Representation before various state agencies: Legislature, Governor's Office, Department of Finance, Homeland Security, CalEPA, CA Air Resources Board, CA Transportation Commission, Business, Transportation and Housing Agency	\$35,000.00
Q4 2009	California Strategies and Advocacy LLC	Harbor (Port of LA, POLA)	E6362	Strategic consulting, communications, crisis communications, and legislative and regulatory advocacy	Representation before various state agencies: Legislature; Governor's Office; Dept. of Finance; Homeland Security; CalEpa; CA Air Resources Board; CA Transportation Commission; Business, Transportation & Housing Agency	\$28,500.00
Q3 2009	California Strategies and Advocacy LLC	Harbor (Port of LA, POLA)	E6362	Strategic consulting, communications, crisis communications, and legislative and regulatory advocacy	Representation before various state agencies: Legislature, Governor's Office, Dept. of Finance, Homeland Security, CalEpa, CA Air Resources Board, CA Transportation Commission, Business, Transportation & Housing Agency	\$39,500.00
Q2 2004	Catalyst Communications Inc	Public Works		Proposition F Fire Facilities	Community Outreach	\$7,195.00
Q3 2003	Catalyst Communications Inc	Public Works		Proposition F Fire Facilities Bond	Community Outreach	\$23,481.00
Q1 2004	Catalyst Communications Inc	Public Works		Proposition F Fire Facilities	Community Outreach	\$20,661.66
Q1 2003	Catalyst Communications	City of LA		Preposition F Fire	Community Outreach	\$14,325.60

	Inc			Facilities Bond	services	
Q1 2005	Catalyst Communications Inc	Transportation (LADOT, DOT)		Community DASH Need Assessment Study	Community Outreach Services	\$2,936.00
Q3 2004	Catalyst Communications Inc	Public Works		Proposition F Fire Facilities	Community Outreach	\$1,475.00
Q2 2003	Catalyst Communications Inc	City of LA		Preposition F Fire Facilities Bond	Community Outreach Services	\$23,154.44
Q1 2005	Catalyst Communications Inc	Public Works		Propositiono F Fire Facilities	Community Outreach Services	\$2,363.00
Q3 2015	Courtney Chesla Torres	Airports, Los Angeles World (LAWA, LAX)	(DA-4860)	External stakeholder coordination support to LAWA/MapLAX. Subcontractor (Task Order 7).	Meeting with team members to receive overview of efforts and progress; Review current materials, offer suggestion, edits; Draft any additional materials needed for specific stakeholders.	\$5,000.00
Q4 2015	Courtney Chesla Torres	Airports, Los Angeles World (LAWA, LAX)	(DA-4860)	External stakeholder coordination support to LAWA/MapLAX. Subcontractor (Task Order 7).	Meeting with team members to receive overview of efforts and progress; Review current materials, offer suggestions, edits; Draft any additional materials needed for specific stakeholders	\$250.00
Q2 2015	Courtney Chesla Torres	Airports, Los Angeles World (LAWA, LAX)	DA-4860	External stakeholder coordination support to LAWA/MapLAX. Subcontractor (Task Order 7).	Meeting with team members to receive overview of efforts and progress; Review current materials, offer suggestions, edits; Draft any additional materials needed for specific stakeholders.	\$6,062.50
Q1 2016	Courtney Chesla Torres	Airports, Los Angeles World (LAWA, LAX)	DA-4860	External stakeholder coordination support to LAWA/MapLAX. Subcontractor (Task Order 7).	Meeting with team members to receive overview of efforts and progress; Review current materials, offer suggestions, edits; Draft any additional materials needed for specific stakeholders	\$1,500.00
Q1 2017	Craig Lawson & Co., LLC	City Attorney, Office of	C-128756	Personal Services Agreement	Expert Witness Services	\$13,163.00
Q1 2017	Craig Lawson & Co., LLC/Lawson, Craig	City Attorney, Office of	C-128756	Personal Services	Expert Witness Services	\$13,163.00
Q1 2014	Englander Knabe and Allen	Fire and Police Pensions	14804640301	Media and message development training	Provided media and message development training	\$3,500.00
Q2 2003	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal representation in various pending liability lawsuits.	Legal representation in defense of claims against the City.	\$130,901.35
Q3 2003	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal representation in various pending liability lawsuits	Legal representation in defense of claims against the city.	\$15,046.00
Q3 2004	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal services	Legal representation of City in defense of various litigation matters	\$9,635.00
Q3 2006	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal defense of various City agencies in pending litigation matters	Legal representation	\$110.00
Q4 2003	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Defense of City and City agencies in various pending litigation matters.	Legal services	\$319,537.00
Q2 2005	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal representation	Defense of City of Los Angeles in various litigation matters	\$360,035.00

Q2 2006	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal defense of various City agencies in pending litigation matters	Legal representation	\$9,845.00
Q1 2006	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal defense of City agencies in various pending litigation matters	Legal representation	\$5,800.00
Q4 2004	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal representation	Defense of City in various litigation matters.	\$291,063.00
Q1 2007	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Contract for legal services	Representation of City of Los Angeles in various litigation matters.	\$36,700.00
Q1 2004	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal services contract.	Legal defense of City in various pending litigation matters.	\$387,370.37
Q1 2005	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal defense of City agencies in various pending litigation matters.	Legal representation.	\$316,108.00
Q1 2003	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal representation in various pending liability lawsuits.	Legal representation in defense of claims against the City	\$97,539.50
Q3 2005	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal services	Legal defense of City agencies in various pending litigation matters	\$53,457.00
Q2 2004	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	City of LA		Legal services contract	Legal services in connection with defense of City in various pending litigation matters.	\$122,418.30
Q3 2015	Gonzalez, Quintana, Hunter & Cruz, LLC	Mayor, Office of	C123207	Lobbying services at the State Level, which were also reported on GQH state level lobbying quarter report.	No bills lobbied this quarter.	\$15,000.00
Q3 2014	Gonzalez, Quintana, Hunter & Cruz, LLC	Mayor, Office of	C123207	Lobbying Services at the State Level	Film Tax Credits, AB1839	\$7,500.00
Q2 2014	Gonzalez, Quintana, Hunter & Cruz, LLC	Mayor, Office of	C123207	Lobbying Services at the State Level	AB1435, Film Tax Credits	\$39,500.00
Q1 2014	Gonzalez, Quintana, Hunter & Cruz, LLC	Mayor, Office of	C-123207	Lobbying Services at the State Level	AB1435, Film Tax Credits	\$7,500.00
Q1 2003	Greer/Dailey	Community Redevelopment Agency (CRA)	02-0360	Consulting on issues related to CRA initiatives	Public affairs-related consulting services	\$2,208.00
Q2 2003	Greer/Dailey	Community Redevelopment Agency (CRA)	02-0360	Public Affairs Consulting	Consulting on issues related to CRA initiatives.	\$2,208.80
Q3 2005	Greer/Dailey	Community Redevelopment Agency (CRA)	04-0464	Community Outreach Services	Community Outreach Consultation	\$821.25
Q1 2003	Greer/Dailey	Port of LA (POLA)	E6099	Advice and counsel and community outreach in port and harbor areas related to potential projects and development.	Public Outreach Service	\$13,854.00
Q2 2003	Greer/Dailey	Port of LA (POLA)	E6099	Public Outreach Services	Advice and counsel, and community outreach in port and harbor areas related to potential projects and development.	\$846.23
Q2 2006	Greer/Dailey	Community Redevelopment Agency (CRA)	PO# 04-0464	Purchase Order with Public Affairs Department CRA/LA	Convene meeting of community leaders in Hollywood regarding affordable housing	\$9,325.00
Q1 2012	Greer/Dailey	Airports, Los Angeles World (LAWA, LAX)	N/A	LAX Northside Plan Update (Greer/Dailey is a	public outreach consulting services	\$39,441.25

				sub contractor to URS Corp, which is prime)		
Q1 2006	Hal Bernson	Transportation Cmte	N/A	N/A	BOARD MEMBER	\$600.00
Q1 2006	Kelly Crane Law, LLP/Kelly, Peter D	Community Redevelopment Agency (CRA)	108829	Litigation	Legal	\$140,000.00
Q1 2006	Kelly Crane Law, LLP	Community Redevelopment Agency (CRA)	108829	Litigation	Legal	\$140,000.00
Q2 2006	Kelly Crane Law, LLP	Community Redevelopment Agency (CRA)	502903	Outside legal services for eminent domain	payments for LEGAL SERVICES rendered by a firm other than Kelly Lytton & Vann, LLP but assigned to KLV.	\$37,657.00
Q1 2012	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	47011-1	Strategic real estate plan	Professional real estate consulting services	\$35,218.75
Q4 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503521	South Los Angeles Industrial Tract Market Study	Assistance with the creation of an economic development plan	\$17,562.50
Q3 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	11-0292-003	Commercial real estate underwriting services	Commercial real estate underwriting services	\$1,627.50
Q2 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503521	South Los Angeles Industrial Tract market Study	Assistance with the creation of an economic development plan	\$23,900.00
Q1 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503521	Economic development consulting services for the Goodyear Tract	Economic development consulting services for the Goodyear Tract	\$15,415.00
Q3 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	11-0292-002	Preparation of an estimate of fair market value and a 33433 report/reuse analysis	Preparation of an estimate of fair market value and a 33433 report/reuse analysis for an agency-owned property, Fire House No. 18	\$6,000.00
Q4 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	49018-1	Professional real estate consulting services	Real estate consulting re the LADWP strategic plan	\$46,968.75
Q2 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	47011-1	Strategic Real Estate Plan	Professional real estate consulting services	\$5,125.00
Q3 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503378	Southwest Los Angeles Community Plan Update	Review of building permit data for last five years. Report Summarizing Development Potential	\$4,134.07
Q2 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503378	Southwest Los Angeles Community Plan Update	Review of building permit data for last five years. Report Summarizing Development Potential	\$10,237.50
Q1 2012	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	P.O. 11-0533	Vermont/Manchester Commercial Shopping Center	Financial analysis and redevelopment consulting services	\$5,162.75
Q4 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	47011-1	Strategic real estate plan	Professional real estate consulting services	\$47,126.25
Q3 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	47011-1	Strategic real estate plan	Professional real estate consulting services	\$99,953.75
Q2 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	11-0292-001	Commercial real estate underwriting services	Commercial real estate underwriting services	\$12,151.25
Q3 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	11-0533	Economic and real estate analysis consulting services	Expert testimony, financial analysis and redevelopment consulting in relation to an eminent domain trial regarding site located within the Vermont/Manchester redevelopment project area	\$2,637.50

Q1 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Water & Power (DWP)	49018-1	Professional real estate consulting services	Real estate consulting re the LADWP strategic plan	\$25,134.55
Q4 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Economic and Workforce Development Dept (EWDD)		Tax revenue and economic feasibility analysis for Midtown Crossing project.	Economic feasibility analysis for Midtown Crossing Project, and related tasks requested by the City.	\$3,357.49
Q3 2011	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503521	South Los Angeles Industrial Tract Market Study	Assistance with the creation of an economic development plan	\$2,268.75
Q4 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Community Redevelopment Agency (CRA)	503521	Economic development consulting services for the Goodyear Tract.	Economic development consulting services for the Goodyear Tract	\$14,375.00
Q2 2010	Kosmont & Associates, Inc. dba Kosmont Companies	Economic and Workforce Development Dept (EWDD)	N/A	Economic feasibility consulting services to the City by evaluating the site specific tax revenue estimated for the Midtown Crossing Project, and other related tasks requested by the City of L.A., Office of the Chief Legislative Analyst	Same as above	\$2,385.50
Q4 2015	Kosmont & Associates, Inc. dba Kosmont Companies	Economic and Workforce Development Dept (EWDD)	n/a	Preparation of EIFD power point presentation	Preparation of EIFD power point presentation	\$1,778.40
Q3 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions. Agreement #47042	Reimbursement of costs advance in connection with agreement # 47042	\$127.80
Q4 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Legal services.	\$6,662.50
Q4 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative Advocacy.	Reimbursement of costs advanced in connection with the Adelphia Bankruptcy matter.	\$22.50
Q2 2005	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia Bankruptcy	Reimbursement of costs advanced	\$43.98
Q1 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Agreement #47042	Provide assistance & representation in litigation, energy matters and transactions.	Legal services	\$29,387.79
Q2 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Agreement #47042	Provide assistance & representation in litigation, energy matters and transactions.	Reimbursement of costs advanced in connection w/ Agreement #47042.	\$35,797.51
Q2 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative Advocacy	Reimbursement of costs advanced	\$559.99
Q1 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Legal services.	\$43,921.50
Q4 2004	Manatt Phelps & Phillips LLP	City of LA	C-104208	Reperesentation of the City in the Adelphia Bankruptcy proceeding.	Legal Services	\$6.50
Q3 2005	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia Bankruptcy	Legal Services	\$15,372.50
Q3 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Reimbursement of costs.	\$70.00
Q2 2004	Manatt Phelps & Phillips LLP	City of LA		Representation of the City in the Adelphia Bankruptcy proceeding before	Reimbursement of costs advanced in connection with Adelphia Bankruptcy matter.	\$3.10

				the US District Court, Southern District of New York.		
Q3 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	#47300-4	Legislative advocacy.	Reimbursement of costs advanced in connection with the Adelphia Bankruptcy matter.	\$1,546.89
Q2 2007	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legal Services	Legal Services	\$70,160.36
Q2 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions. Agreement #47042	Legal Services	\$1,224.50
Q3 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	#47042	Provide assistance and representation in litigation, energy matters and transactions. Amendment No 1 to Agreement #47042	Reimbursement of costs advanced in connection with Amendment No. 1 to Agreement #47042	\$3,515.61
Q3 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal services	\$89,377.50
Q1 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions. Amendment No. 1 to Agreement #47042.	Reimbursement of cost advanced in connection with Amendment #1 to Agreement 47042.	\$4.50
Q3 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	#47042	Provide assistance and representation in litigation, energy matters and transactions.	Legal Services	\$4,384.50
Q1 2007	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal services.	\$64,905.00
Q3 2004	Manatt Phelps & Phillips LLP	City of LA	#C-104208	Representation of the City in the Adelphia Bankruptcy proceeding.	Legal Services	\$5,420.00
Q1 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions.	Reimbursement of costs advanced in connection with Agreement #47042	\$569.60
Q3 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy	Reimbursement of costs advanced	\$11.43
Q2 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal Services	\$21,635.00
Q4 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions.	Reimbursement of costs advanced in connection with Agreement 47042	\$477.53
Q1 2007	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia Bankruptcy	Legal services.	\$7,377.50
Q1 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal Services	\$44,770.00
Q3 2003	Manatt Phelps & Phillips LLP	City of LA	104208	Representation of the City in the Adelphia Bankruptcy proceeding before the US District Court, Southern District of New York.	Representation of the City in the Adelphia Bankruptcy proceeding before the US District Court, Southern District of New York.	\$146,540.75
Q4 2005	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Legal services.	\$69,381.37
Q4 2006	Manatt Phelps & Phillips	Water & Power	47479-6	Owens Lake dust	Legal services	\$242,925.20

	LLP	(DWP)	(formerly 49046-6)	mitigation.		
Q1 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Amendment #1 to Agreement #47042	Provide assistance and representation in reviewing, investigating and providing reports to City Atty on open EEO complaints & training.	Reimbursement of costs advanced in connection w/ Amendment #1 to Agreement #47042.	\$844.65
Q2 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal services.	\$45,896.25
Q2 2003	Manatt Phelps & Phillips LLP	City of LA	Contract #C-104208	Representation of the City in the Adelphia Bankruptcy proceeding before the U.S. District Court, Southern District of New York.	Legal services	\$61,472.48
Q4 2003	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation of the City in the Adelphia Bankruptcy proceeding before the US District Court, Southern District of New York	Legal Services	\$16,879.55
Q3 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in reviewing, investigating and providing reports to City Attorney on open EEO complaints and training. Amendments #1 to Agreement #47042	Legal Services	\$60,548.80
Q4 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy	Legal services.	\$82,265.00
Q4 2004	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation of the City in the Adelphia Bankruptcy proceeding.	Legal Services	\$16,055.00
Q1 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Agreement #47042	Provide assistance and representation in litigation energy matters & transactions.	Reimbursement of costs advanced in connection with Agreement #47042.	\$38,512.34
Q2 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Legal services.	\$22,048.72
Q2 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Amendment #1 to Agreement #47042	Provide assistance and representation in reviewing, investigating & providing reports City Attorney on open EEO complaints and training.	Legal services	\$58,810.40
Q4 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy	LEGAL SERVICES	\$65,015.00
Q2 2005	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia Bankruptcy	Legal Services	\$46,470.62
Q1 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Reimbursement of costs.	\$1,210.62
Q2 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Agreement #47042	Provide assistance & representation in litigation, energy matters and transactions.	Legal services	\$183,364.61
Q3 2003	Manatt Phelps & Phillips	Water & Power	47042	Provide assistance	Legal services	\$80,817.00

	LLP	(DWP)		and representation in litigation, energy matters and transactions. Agreement #47042		
Q3 2005	Manatt Phelps & Phillips LLP	City of LA	104208	Adelphia Bankruptcy	Reimbursement of costs advanced	\$130.90
Q2 2007	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47479-6	Legal Services	Legal Services	\$70,160.36
Q2 2004	Manatt Phelps & Phillips LLP	City of LA		Representation of the City in the Adelphia Bankruptcy proceedings before the US District Court, Southern District of New York.	Legal Services	\$975.00
Q3 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	#47300-4	Legislative advocacy.	Legal Services	\$259,890.00
Q1 2004	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation of the City in the Adelphia Bankruptcy proceedings before the US District Court, Southern District of NY.	Legal Services	\$3,315.00
Q3 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	#47042	Provide assistance and representation in litigation, energy matters and transactions. Amendment No 1 to Agreement #47042	Legal Services	\$2,030.00
Q1 2004	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation in the City in the Adelphia Bankruptcy proceedings before the US District Court, Southern District of New York.	Reimbursement of costs advanced in connection with the Adelphia Bankruptcy matter.	\$1.27
Q3 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy	Legal services	\$10,985.00
Q1 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	42042	Provide assistance and representation in litigation, energy matters and transactions. Amendment No.1 to Agreement #42042	Legal Services	\$4,323.00
Q3 2004	Manatt Phelps & Phillips LLP	City of LA	#C-104208	Representation of the City in the Adelphia Bankruptcy proceeding.	Reimbursement of costs advanced in connection with the Adelphia Bankruptcy matter.	\$12.20
Q1 2007	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy.	Reimbursement of costs.	\$14.40
Q1 2004	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions.	Legal Services	\$93,250.14
Q1 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative Advocacy	Reimbursement of costs advanced	\$107.50
Q4 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provide assistance and representation in litigation, energy matters and transactions.	Legal services	\$158,701.70
Q3 2005	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Legal Services	\$43,117.50
Q3 2003	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation of the City in the Adelphia Bankruptcy	Reimbursement of costs advanced in connection with the Adelphia	\$269.88

				proceeding before the US District Court, Southern District of New York.	Bankruptcy matter.	
Q4 2005	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy.	Reimbursement of costs advanced.	\$2,150.53
Q4 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47479-6 (formerly 49046-6)	Owens Lake dust mitigation.	Reimbursement of costs	\$4,300.84
Q2 2003	Manatt Phelps & Phillips LLP	City of LA	Contract #C-104208	Representation of the City in the Adelphia Bankruptcy proceeding before the U.S. District Court, Southern District of New York.	Reimbursement of costs advanced in connection w/ the Adelphia Bankruptcy matter.	\$269.52
Q4 2003	Manatt Phelps & Phillips LLP	City of LA	C-104208	Representation of the City in the Adelphia Bankruptcy proceeding before the US District Court, Southern District of New York.	Reimbursement of costs advanced in connection with the Adelphia Bankruptcy matter.	\$1,521.55
Q3 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47042	Provided assistance and representation in reviewing, investigating and providing reports to City Attorney on open EEO complaints and training. Amendment #1 to Agreement #47042	Reimbursement of costs advanced in connection with Amendment #1 to Agreement 47042	\$209.62
Q4 2006	Manatt Phelps & Phillips LLP	Water & Power (DWP)	47300-4	Legislative advocacy.	Reimbursement of costs.	\$57.00
Q1 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Amendment #1 to Agreement #47042.	Provide assistance and representation in reviewing, investigating and providing reports to City Atty on open EEO complaints & training.	Legal Services	\$67,749.20
Q2 2006	Manatt Phelps & Phillips LLP	City of LA	C-104208	Adelphia bankruptcy.	Reimbursement of costs.	\$186.09
Q2 2003	Manatt Phelps & Phillips LLP	Water & Power (DWP)	Amendment #1 to Agreement #47042	Provide assistance and representation in reviewing, investigating & providing reports City Attorney on open EEO complaints and training.	Reimbursement of costs advanced in connection w/ Amendment #1 to Agreement #47042	\$3,834.25
Q3 2009	Mayer Brown LLP	Harbor (Port of LA, POLA)		Legal services.	Represent city in Qui Tam action.	\$65,272.43
Q3 2004	Mayer Brown LLP	Water & Power (DWP)	47203-3	Contract for Legal Services	Legal services	\$400.00
Q1 2009	Mayer Brown LLP	Harbor (Port of LA, POLA)		Represent city of Los Angeles in Qui Tam Lawsuit against Port of Los Angeles.	Defend city of Los Angeles.	\$74,820.84
Q4 2004	Mayer Brown LLP	Airports, Los Angeles World (LAWA, LAX)	DA-3811	Legal services re master planning at Palmdale, Ontario and Van Nuys Airports.	Legal services re master planning at Palmdale, Ontario and Van Nuys Airports.	\$80,851.33
Q2 2004	Mayer Brown LLP	Water & Power (DWP)	47203-3	Legal Services	Legal Services	\$39,362.74

Q2 2009	Mayer Brown LLP	Harbor (Port of LA, POLA)		Represent city of Los Angeles in Qui Tam lawsuit against Port.	Defend city of Los Angeles.	\$21,728.37
Q4 2008	Mayer Brown LLP	Harbor (Port of LA, POLA)		Moseler v. Port of Los Angeles	Legal services.	\$44,628.62
Q3 2004	Mayer Brown LLP	Airports, Los Angeles World (LAWA, LAX)	DA-3811	Contract for Legal Services	Legal services	\$147,021.62
Q4 2009	Mayer Brown LLP/Tubert, Patricia	Chief Legislative Analyst (CLA)		Consulting.	Real Estate Consulting.	\$12,920.00
Q3 2009	Mayer Brown LLP/Tubert, Patricia	Chief Legislative Analyst (CLA)		Legal services.	Legal services.	\$3,781.00
Q2 2009	Mayer Brown LLP/Tubert, Patricia	Chief Legislative Analyst (CLA)		Advice.	Provide real-estate advice to the CLA on the potential sale of the City-owned property known as the Mangrove site and on the potential concession of City parking assets.	\$14,518.00
Q3 2005	O'Melveny & Myers, LLP	City of LA	2268	Investigation and defense of lawsuit	Legal Services	\$6,965.00
Q1 2004	O'Melveny & Myers, LLP	City of LA	2268	Agreement for legal services	Investigation and defense of lawsuit.	\$11,106.36
Q1 2004	O'Melveny & Myers, LLP	City of LA	None given	None given	Tax and related advices regarding City retirement and benefits plan.	\$12,497.15
Q1 2006	O'Melveny & Myers, LLP	City of LA	102838	Agreement for Legal Services	Investigation and Defense of Lawsuit	\$445.00
Q3 2004	O'Melveny & Myers, LLP	City of LA	47039	None given	Advice regarding electrical power issues	\$50,913.15
Q3 2004	O'Melveny & Myers, LLP	City of LA	None given	None given	Tax and related advice regarding City retirement and benefit plans.	\$3,717.05
Q2 2004	O'Melveny & Myers, LLP	City of LA	2268	Agreement for legal services	Investigation and defense of lawsuit.	\$32,447.00
Q2 2006	O'Melveny & Myers, LLP	City of LA	102838	Agreement for Legal Services	Investigation and Defense of Lawsuit	\$191,923.30
Q2 2005	O'Melveny & Myers, LLP	City of LA	102838	Professional Services	Representation of City in multiple lawsuits	\$7,064.00
Q4 2004	O'Melveny & Myers, LLP	City of LA	102838	Professional Services	Representation of City in multiple lawsuits	\$28,044.45
Q1 2004	O'Melveny & Myers, LLP	City of LA	47039	None given	Advice regarding electrical power issues	\$63,194.47
Q1 2004	O'Melveny & Myers, LLP	City of LA	102838	Professional Services	Representation of City in multiple lawsuits.	\$1,739,130.77
Q2 2004	O'Melveny & Myers, LLP	City of LA	47039	None given	Advice regarding electrical power issues	\$30,980.00
Q3 2004	O'Melveny & Myers, LLP	City of LA	102838	Professional Services	Representation of City in lawsuits	\$50,643.68
Q2 2004	O'Melveny & Myers, LLP	City of LA	102838	Professional services	Representation of City in multiple lawsuits	\$399,150.00
Q2 2004	O'Melveny & Myers, LLP	City of LA		None given	Tax and related advice regarding city retirement and benefit plans.	\$1,754.00
Q4 2012	Park & Velayos	Housing Authority (HACLA)	HA-2011-055	JORDAN DOWNS REDEVELOPMENT PROJECT	LEGAL SERVICES	\$3,805.00
Q1 2012	Park & Velayos	Housing Authority (HACLA)	HA-2011-055	Legal Services	Legal Services	\$37,092.50
Q2 2012	Park & Velayos	Housing Authority (HACLA)	HA-2011-055	Jordan Downs Redevelopment Project.	Legal Services	\$1,920.00
Q4 2007	Progressive Strategy Partners/Martinez Bracamonte, Yvette	City Council	n/a	Contract between Progressive Strategy Partners LLC and	Provided staff development services to District 13 council office	\$6,000.00

				Eric Garcetti Officeholder committee	prior to qualification	
Q4 2007	Progressive Strategy Partners	City Council	n/a	Contract between Progressive Strategy Partners LLC and Eric Garcetti Officeholder committee	Provided staff development services to District 13 council office prior to qualification	\$6,000.00
Q3 2008	Richard Alatorre	Housing Authority (HACLA)		Advise the director of the Housing Authority	Advise the director of the Housing Authority	\$4,800.00
Q1 2008	Richard Alatorre	Housing Authority (HACLA)		Advise the director of the Housing Authority	Advise the director of the Housing Authority	\$7,200.00
Q4 2012	Richards Watson Gershon	City Administrative Officer (CAO)	C-121371	Transactional and Litigation Services relating to the Former Community Redevelopment Agency of Los Angeles (CRA/LA), now known as the CRA Designated Local Authority (CRA/DLA).	Legal Services	\$315,331.24
Q1 2008	Rosenheim & Associates, Inc.	Harbor (Port of LA, POLA)	E6375	Entitlement Analysis, Project Management, Appeals	Land Use and Entitlement Consulting Services	\$16,344.64
Q4 2007	Rosenheim & Associates, Inc.	Harbor (Port of LA, POLA)	E6375	Land Entitlement Matters	Land Entitlement Matters	\$1,472.10
Q3 2004	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6198	Various Land Entitlement issues	Various Land Entitlement issues	\$222.08
Q4 2006	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6198	Labor & Expenses for Specialist Services	Land Use Consulting services in conjunction with a proposed Vesting Tentative Tract Map to merge and re-subdivide City owned property. Meetings, phone calls, and correspondence with City agencies regarding the proposed subdivision.	\$1,203.75
Q1 2004	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6198	Land Use entitlement consulting	Land Use entitlement consulting	\$3,166.00
Q2 2004	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6198	Various land entitlement issues	Various land entitlement issues	\$700.00
Q2 2008	Rosenheim & Associates, Inc.	Harbor (Port of LA, POLA)	E6375	Entitlement Analysis, Project Management, Appeals	Land Use Entitlement Consulting Services	\$956.25
Q2 2007	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6375	Entitlement analysis, project management, appeals	Land Use and Entitlement Consulting Services	\$5,010.00
Q4 2004	Rosenheim & Associates, Inc.	Port of LA (POLA)	E6198	Land Entitlement matters	Land Entitlement matters	\$768.75
Q3 2007	Rosenheim & Associates, Inc.	Harbor (Port of LA, POLA)	E6375	Land Entitlement Matters	Land Entitlement Matters	\$3,323.52
Q1 2012	SNR Denton LLP	Water & Power (DWP)	47059-2	Federal Affairs	Advocacy/assistance to develop/execute legislative & administrative/regulatory strategies to protect & advance the City's interests relative to proposed Federal legislation and administrative/regulatory issues affecting utility operations.	\$51,000.00

Q3 2012	SNR Denton LLP	Water & Power (DWP)		Federal Affairs	Federal Affairs work for the City of Los Angeles Department of Water and Power	\$37,425.18
Q2 2012	SNR Denton LLP	Water & Power (DWP)	47059-2	Federal affairs	Advocacy/assistance to develop/execute legislative & administrative/regulatory strategies to protect & advance the City's interests relative to proposed Federal legislation and administrative/regulatory issues affecting utility operations.	\$90,247.68
Q4 2012	SNR Denton LLP	Water & Power (DWP)		Federal Affairs	Federal Affairs work for the city of Los Angeles Department of Water and Power	\$85,000.00
Q4 2015	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6814	City's position re South Coast Air Quality Management District's Proposed Rule 4001.	Outreach	\$26,668.75
Q3 2014	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6739	City's Position re South Coast Air Quality Management District's Proposed Rule 4001	Outreach	\$26,850.00
Q2 2015	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6739	City's Position re South Coast Air Quality Management District's Proposed Rule 4001	Outreach	\$17,956.25
Q1 2014	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6739	City's Position re South Coast Air Quality Management District's Proposed Rule 4001	Outreach	\$5,987.50
Q2 2016	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6814	City's position re South Coast Air Quality Management District's proposed rule 4001.	Outreach	\$16,256.25
Q1 2016	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6814	City's position re South Coast Air Quality Management District's Proposed Rule 4001.	Outreach	\$6,800.00
Q4 2014	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6739	City's Position re South Coast Air Quality Management District's Proposed Rule 4001	Outreach	\$5,737.50
Q2 2014	Vectis Strategies, LLC	Harbor (Port of LA, POLA)		City's Position re South Coast Air Quality Management District's Proposed Rule 4001 (E6739)	Outreach	\$15,375.00
Q1 2015	Vectis Strategies, LLC	Harbor (Port of LA, POLA)	E6739	City's Position re South Coast Air Quality Management District's Proposed Rule 4001	Outreach	\$12,750.00
Total Payments Received from City Agencies :						\$11,026,936.62

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(Data available from 1st Quarter of 2003)

Disclaimer: EFS data is input by lobbyists. The Commission does not amend information to edit variations in spelling, punctuation, use of abbreviations or inaccuracies. Therefore, search results may not be 100% accurate.

Pay-to-Play in The City of Los Angeles

"Money Goes in, Favors Goes Out, We All Pay the Price: Who Do L.A. City Leaders Work For?"

A timeline of City Council and L.A. City Staff backroom meetings with developers and lobbyists; campaign donations to City Officials; and "spot-zoning" approvals for controversial projects

A Special March 4, 2017 Report on Backroom Governing and Undue Developer Influence Upon L.A. Elected Leaders

Sourcing: All facts provided by Los Angeles City Ethics Commission or contained in official documents released by Los Angeles City Council members as required by the California Public Records Act.

Released by the Coalition to Preserve LA, Yes on Measure S

Summary:

Yes on Measure S today releases a special report of official city information that has been released publicly, but unpublished to date. It reveals how L.A. City Hall works behind closed doors, on behalf of developers and usually without the knowledge of the public, to get around an area's zoning rules. Most developers donate to L.A. elected leaders throughout the backroom process.

"Pay to Play In Los Angeles City Government" contains a comprehensive timeline of private meetings and dinners involving billionaire developers, elected City leaders and their staffs. It reveals that private meetings are rarely granted by elected leaders to L.A. residents who question the developments.

The timeline, entirely made up of official city documents released under the California Public Records Act, or official city campaign finance and lobbyist data published by the L.A. City Ethics Commission, includes:

- **Dates and people present** at private backroom meetings between developers and City Council officials and city employees.
- **Donations received** by elected officials from these developers during the process.
- **City Council approval** of projects achieved by badly bending L.A. zoning rules, often after private meetings and/or donations from the developer.

Nine Los Angeles City Council members were asked by the Coalition to Preserve L.A. to divulge this public information. All nine failed to release the subject of these backroom meetings with developers. They divulged only the fact that the meetings happened, in response to California Public Records Act requests by the Coalition.

The nine L.A. City Council members, of 15 on the City Council, were asked for their official appointment calendars regarding these large-scale developments, because their Council Districts contain a significant number of projects that have been allowed, by vote of the City Council, to ignore city zoning rules.

Some of the nine City Council members responded long after the 10-day deadline under the California Public Records Act (CPRA).

City Councilman Jose Huizar failed for several months to provide his meeting calendar. Councilman Huizar complied with California state law only after attorneys for the Coalition demanded that he divulge this public information.

The official city data provides a direct look at the campaign and lobbying cash spent to influence City Hall leaders as they decide, in a non-transparent and money-influenced system, how and where L.A. and its neighborhoods should absorb large-scale developments.

The official city campaign and lobbying data, and the official calendars released by City Council members, show that collusion between mega-developers and elected officials is endemic. Zoning is for sale at City Hall.

(Continue to next page.)

12 Controversial L.A. Megadevelopments: Who Attends the Backroom Meetings and How Do L.A. Politicians and Developers Benefit?

1. 333 La Cienega Timeline: Developer Rick Caruso

This luxury tower would be 17 stories high, the tallest in the Beverly Grove community at the intersection of San Vicente and La Cienega. Concerned Citizens of Beverly Hills/Beverly Grove have sued the city for giving Caruso favorable treatment to override the zoning of the lands.

May 15, 2012

Rick Caruso donates \$700 to Paul Koretz's campaign for City Council.

March 17, 2014

Rick Caruso donates \$500 to Paul Koretz's campaign for City Council.

July 10, 2014

Meeting between Councilmember Paul Koretz, Rick Caruso, Koretz's planning director Shawn Bayliss and Caruso vice-president Sam Garrison

November 3, 2014

Meeting between Councilmember Paul Koretz, Rick Caruso, planning director Shawn Bayliss and Caruso vice-president Sam Garrison

December 5, 2014

Rick Caruso donates \$500 to Paul Koretz's campaign for City Council.

February 26, 2016

Scoping meeting held for the public to view and comment on project.

September 12, 2016

Meeting between Councilmember Paul Koretz, Rick Caruso, planning director Shawn Bayliss and Caruso vice-president Sam Garrison

What Did Developer Caruso Get?

November 10, 2016

Los Angeles Planning Commission recommends approval of project with a General Plan amendment and Height District Change by a unanimous 7-0-2 vote (two commissioners missing).

December 28, 2016

David Zahniser at the *Los Angeles Times* write an article on stream of donations flowing from Rick Caruso and his family and associates.

Real estate developer Rick Caruso has been a reliable benefactor at Los Angeles City Hall, giving donations big and small to the city's politicians and their pet causes.

Caruso, known for the Grove and other shopping destinations, has donated to all but one of the city's 17 elected officials. His charitable foundation provided \$125,000 to a nonprofit set up by Mayor Eric Garcetti. ... Add in money from his employees and his family members, and Caruso-affiliated donors have provided more than \$476,000 to the city's elected officials and their initiatives over the past five years, according to contribution reports.

Now, Caruso wants Garcetti and the council to approve a 20-story residential tower on La Cienega Boulevard, on a site where new buildings are currently limited to a height of 45 feet. Opponents of the project view Caruso's donations with alarm, saying the steady stream of contributions has undermined their confidence in the city's planning process.

"I'm sorry, but that's a lot of money," said Keith Nakata, a foe of the project who lives roughly five blocks from the site. "That is obviously something that the community cannot compete against."

Caruso's residential tower is one of several real estate projects — some already approved, others still under consideration — to be reviewed at City Hall as six-figure contributions arrive from developers or donors with close ties to them. ([Los Angeles Times, December 28, 2016](#))

December 29, 2016

City Councilman Paul Koretz pulls his support of the La Cienega project, then Koretz later backs the plan after Caruso makes modest modifications to his proposal.

Los Angeles City Councilman Paul Koretz, under fire from an opponent in the March election, said Thursday that he has pulled his support for a controversial 20-story residential tower proposed near the Beverly Center. Koretz, standing on La Cienega Boulevard near the project site, said he now thinks the planned apartment building is "too tall" — and wants real estate developer Rick Caruso to enter into additional talks with a homeowners group.

"I'm calling on Mr. Caruso to continue meeting with neighborhood representatives and to shrink the project until it is appropriate for the area," said Koretz, who represents neighborhoods from the Westside north to Encino.

The announcement came a day after The Times reported that Caruso, his family members, his companies, his charity and his employees provided more than \$476,000 over the past five years to L.A. city politicians and their pet causes.

Koretz's hastily called news conference took place five hours after his opponent, attorney Jesse Max Creed, held his own media event on La Cienega to speak against the project — and the array of contributions made by Caruso to L.A. politicians and their causes. ([Los Angeles Times, December 29, 2016](#))

What Did Developer Caruso Get?

January 24, 2017

Los Angeles City Council approves the Caruso project including two key exemptions from L.A. zoning rules — a General Plan Amendment and a Height District Change, by a 14-0-1 (unanimous with 1 absent) vote.

2. Koreatown Skyscraper Timeline: Developer Michael Hakim/Colony Holdings

This luxury 30-story skyscraper would displace affordable housing in Koreatown. Two neighborhood groups are suing to halt the project. The developer unsuccessfully ran for Beverly Hills City Council previous to this project, on an anti-development platform.

July 14, 2006

Michael Hakim donated \$500 to Herb Wesson's campaign for City Council.

August 1, 2007

Michael Hakim donated \$500 to Herb Wesson's campaign for City Council.

October 8, 2009

Planning Commission recommends that City Council not adopt General Plan Amendments for this project because it is unsuitable for the area.

December 15, 2009

Department of City Planning disapproves of project, concurring with Planning Commission.

December 23, 2009

Mayor Villaraigosa agrees with Planning Commission disapproval of development property.

February 12, 2010

Catalina Apartment is placed on the agenda for Los Angeles City Council's powerful Planning and Land Use Management Committee (PLUM) meeting on February 16, 2010.

February 16, 2010 through May 5, 2015

Catalina Apartments is "continued" at PLUM, holding the project in limbo.

December 15, 2010

Colony Holdings, LLC, operated by Michael Hakim, donated \$500 to Herb Wesson's campaign for City Council.

June 6, 2012

Meeting between City Councilmember Herb Wesson's deputy Andrew Westall, Wesson executive assistant Shawn Wallace, and Wesson deputy Elizabeth Carlin and the developer, Colony Holdings.

July 11, 2012

Wesson's office has meeting noted as being with "Planning" officials regarding the Michael Hakim/Colony Holdings project.

What Did the Developer Get?

January 30, 2013

Skyscraper is “revived,” by city officials, this time 10 stories shorter and 23 units lighter.

A developer is moving forward in an attempt to revive a proposed high-rise multifamily tower in the Wilshire District that was rejected by Los Angeles city planning officials in 2009.

Colony Holdings LLC, a group of investors headed by Mike Hakim, originally proposed a larger-scale 35-story mixed-use project with 270 units, ground retail and 663 parking spaces at a site on South Catalina Street south of W. 8th Street.

In late 2009, the Los Angeles Planning Commission rejected zoning changes for the project bounded by 805-833 South Catalina St., the 800-block of South Kenmore Avenue, and West 8th Street, concerned that the project was incompatible with the surrounding low- and mid-rise neighborhood of older homes and apartments.

The company re-submitted the project as a smaller 25-story, 227-unit tower, with 3,600 square feet of retail and 454 parking spaces, and a rooftop helipad, according to documents filed with the planning department. Colony Holdings officials outlined the project at the city Planning and Land Use Management Committee meeting on Jan. 29. ([CoStar News, January 30, 2013](#))

June 30, 2014

Colony Holdings, LLC, operated by Michael Hakim, donated \$700 to Herb Wesson’s campaign for City Council.

December 17, 2014

Grand opening of another project, Onyx Tower, is attended by Herb Wesson by invitation of Michael Hakim.

May 18, 2015

[According to the Los Angeles Times, during this spring, Hakim gives \\$1 million to the city's Affordable Housing Trust Fund, enough to build 3 units of affordable housing. He gives \\$250,000 to a public trust fund controlled by Councilman Herb Wesson.](#)

What Did the Developer Get?

April 15, 2015

Mayor Eric Garcetti issues letter to City Council stating he disagrees with findings of the City Planning Commission and overrules it, approving a General Plan Amendment and Zone Change for Hakim's skyscraper.

But Mayor Eric Garcetti did something recently that surprised activists, housing advocates and planning wonks: He rejected a decision by a panel of his own appointees.

Last month, Garcetti threw his support behind a controversial 27-story residential tower in Koreatown. He did so even though the people he put on the city Planning Commission unanimously rejected the apartment project, saying it would be too big for the surrounding neighborhood. On

April 15, Garcetti notified the council he was disapproving his commissioners' decision.

The mayor's action is the latest example of city leaders helping to boost the value of a piece of property via generous zoning changes or other deviations from city planning rules. It also may signal how Garcetti, who hopes to add 100,000 housing units in the city by 2021, will approach other development projects enmeshed in controversy. ([Los Angeles Times, May 18, 2015](#))

June 15, 2015

Community Impact Statement submitted by Wilshire Center-Koreatown Neighborhood Council recommended that City Council not approve the project.

June 17, 2015

LA City Council, in a 10-0-5 vote (unanimous, with 5 missing council members), approves the General Plan Amendment and Zone Change for Hakim's skyscraper in Koreatown.

3. Cumulus Skyscraper Timeline: Carmel Partners of S.F.

This 30-story luxury skyscraper with a 10-story complex around its base is proposed for the corner of La Cienega and Jefferson is being sued by several community groups Crenshaw Subway Coalition and Friends of the Neighborhood Integrity Initiative for violating the City Charter and California Environmental Quality Act.

November 3, 2014

Meeting between Councilmember Herb Wesson and Carmel Partners of San Francisco.

November 14, 2014

Michael Lahorgue, President of Carmel Partners, donates \$700 to Herb Wesson's campaign for City Council.

November 14, 2014

Christopher Bede, who works at Carmel Partners, donates \$700 to Carmel Partners.

November 14, 2014

Ron Zeff, Managing Partner at Carmel Partners, donates \$700 to Herb Wesson's campaign for City Council.

December 23, 2014

Carmel Partners donates \$700 to Jose Huizar's campaign for City Council.

February 5, 2015

Private meeting with Councilmember Herb Wesson, Carmel Partners vice-president Neils Cotter and Carmel Partners founder Ron Zeff at Morton's Steakhouse.

March 2015

Initial study published of the environmental impact of the Cumulus project.

December 15, 2015

Carmel Partners donates \$700 to Jose Huizar's campaign for City Council.

December 29, 2015

Carmel Partners donates \$700 to Curren Price's campaign for City Council.

December 31, 2015

Carmel Partners donates \$700 to Gil Cedillo's campaign for City Council.

January 25, 2016

Private meeting with Councilmember Herb Wesson, his deputy Andrew Westall, his deputy Elizabeth Carlin, and Carmel Partners vice-president Neils Cotter.

April 4, 2016

L.A. Planning Commission, appointed by the mayor, issues a report on the development.

June 7, 2016

City Council approves a General Plan Amendment, Zoning Change and Height Change.

June 30, 2016

Nicholas Zaharow who works at Carmel Partners donates \$200 to Mitch O'Farrell's campaign for City Council.

June 30, 2016

Carmel Partners donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016

Carmel Partners donates \$700 to Joe Buscaino's campaign for City Council.

June 30, 2016

Nicholas Zaharov, who works at Carmel Partners, donates \$700 to Bob Blumenfield's campaign for City Council.

What Did the Developer Get?

September 15, 2016

Financial transaction on the property is finalized after City Council approves of project. The deal, sweetened by the City Council's major exemptions from LA's zoning rules, closes for \$111 million.

4. The Reef Mega-Skyscraper Timeline: Kanon Ventures

*(The Reef is known as a Black Lung Loft—freeway-adjacent new housing that allows children to reside there. USC's seminal Children's Health Study has found these developments result in high levels of lifelong lung damage among children, and USC researchers have testified before the City Council to end their practice of encouraging and [granting favors to the developers of Black Lung Lofts](#). See *Los Angeles Times*, <http://www.latimes.com/projects/la-me-freeway-pollution/and LA Weekly stories on Black Lung Lofts>, <http://www.laweekly.com/news/black-lung-lofts-2164048>.)*

May 3, 2013

Ava Bromberg, Kanon Ventures executive, donates \$1,300 to Eric Garcetti's campaign for mayor.

June 12, 2013

Ava Bromberg, Kanon Ventures executive, donates \$1,000 to Eric Garcetti's campaign for mayor.

June 4, 2014

Curren Price "thrilled" about project coming to his City Council district.

The neighborhood has the chance to evolve as a lower-cost alternative to downtown, where land costs are high, said Rob Katherman, head of planning and economic development for City Councilman Curren D. Price, who represents the 9th District where SoLA is proposed.

"Downtown has become very expensive. It's no cheaper to live downtown in an apartment than it is on the Westside," Katherman said. "I think this is a natural progression."

The development proposal still has to pass through an approval process expected to last about three years that would include multiple public hearings. "There are certainly a lot of details that need to be worked out," Katherman said, "and they need to get the community and stakeholders onboard."

Still, the councilman's office is "thrilled" at the prospect of such substantial privately funded development in the area, he said.

"This is a wonderful opportunity to show what the future of downtown is going to be as it migrates southward." ([Los Angeles Times, June 4, 2014](#))

July 15, 2014

Private meeting between Councilmember Curren Price, Price's deputy Rob Katherman, Price's chief of staff Curtis Earnest, Price's deputy James Westbrooks, and Kanon Ventures executive Ava Bromberg, The Reef project attorney Edgar Khalatian, and Marathon Communications developer lobbyist Richard Lichtenstein.

August 18, 2014

Private meeting between Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy, and deputy James Westbrooks and Kanon Ventures executive Ava Bromberg.

October 7, 2014

Private meeting between Councilmember Curren Price, deputy Paloma Perez-McEvoy and Kanon Ventures executive Ava Bromberg, attorney Edgar Khalatian, Marathon Communications lobbyist Richard Lichtenstein and LA Economic and Workforce Development Department's Jenny Scanlin.

November 10, 2014

Private meeting between Price's deputy Paloma Perez-McEvoy and Marathon Communications lobbyist Shelia Gonzaga and Kanon Ventures executive Ava Bromberg

March 31, 2015

Jon Vartan Hovsepian, managing director for Kanon Ventures, donates \$1,400 to Eric Garcetti's campaign for mayor.

April 14, 2015

Private meeting between Price's deputy Paloma Perez-McEvoy and Rodolfo Monroy, Win Pham, Craig Bullock, Gregg Vandergriff, Planning Department's

Martiza Przekop, Taimour Tanavoli, Los Angeles city employee Ammar Eltawil, L.A. fire inspector John Dallas and attorney Edgar Khalatian

June 30, 2015

Ava Bromberg donates \$250 to Eric Garcetti's campaign for mayor.

September 2015

Draft EIR released.

December 17, 2015

Private meeting between Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and developer lobbyist Howard Sunkin.

June 8, 2016

Private meeting with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and attorney Edgar Khalatian.

June 30, 2016

Private meeting with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and attorney Edgar Khalatian, developer lobbyist Howard Sunkin, developer lobbyist from Marathon Communications Richard Lichtenstein, developer lobbyist from Marathon Communications Sheila Gonzaga and Kanon Ventures' Will Cipes.

July 27, 2016

Private meeting with Price's chief of staff Curtis Earnest, Price's deputy Paloma Perez-McEvoy and developer lobbyist Marathon Communications Richard Lichtenstein.

What Did the Developer Get?

August 11, 2016

Project approved at L.A. City Council Planning Committee meeting by a 5-3 vote.

November 22, 2016

Los Angeles City Council approves of Planning Committee report by a unanimous 12-0-3 vote (three council members absent).

Controversial plans to build a massive housing, hotel, and retail project with a skyscraper on a parking lot in South LA was unanimously approved by the Los Angeles City Council Tuesday.

City leaders have said the development, called The Reef, has the potential to transform the neighborhood, which has been overlooked by developers until now. It may bring job opportunities and quality restaurants to a neglected area, but it has drawn fierce opposition over fears it will drive up living costs and displace thousands of residents.

Streetsblog LA has followed the plans closely and offered this critique today: While it sounds like "livability wet dream" it "caters to a well-heeled clientele;" it is "situated on the edge of a neighborhood that is both one of the poorest in the city and the most overcrowded in the entire country."

Los Angeles City Councilman Curren Price, who reps South LA, told the Los Angeles Times: "It is new ... and we have not seen this in the 9th District or South Los Angeles and there's certainly some

uncertainty about it but definitely some excitement and enthusiasm.”
([Curbed Los Angeles, November 22, 2016](#))

December 14, 2016

City Council approves General Plan Amendment and Zone Change to exempt The Reef from L.A.'s zoning rules, and approves the development agreement, by a unanimous 12-0-3 vote (three are absent).

5. 8150 Sunset Tower Timeline: Townscape Partners

This 300,000 square foot megadevelopment at the foot of Laurel Canyon was approved by the city using a process that set aside local height limits. The group Fix the City is suing the project for violating environmental laws and LA Conservancy is suing the city for violating historic preservation laws.

May 30, 2013

Townscape Management Inc donates \$1,000 to Eric Garcetti's campaign for mayor.

August 2, 2013

Townscape Management Inc donates \$500 to Paul Koretz's campaign for City Council.

June 26, 2014

John Irwin, an executive of Townscape Management Partners, donates \$700 to Carolyn Ramsay's campaign for City Council.

August 6, 2014

Townscape Management Inc donates \$1,000 to Eric Garcetti's Officeholder Account.

November 14, 2014

Townscape Management Inc donates \$700 to Herb Wesson's campaign for City Council.

February 25, 2015

John Irwin, an executive of Townscape Management Partners, donates \$500 to Jose Huizar's campaign for City Council. (Ramsay is Council member Tom LaBonge's chief of staff.)

March 26, 2015

Tyler Siegel, an executive of Townscape Management Partners, donates \$700 to Carolyn Ramsay's campaign for City Council.

December 26, 2015

Tyler Siegel of Townscape Partners donates \$500 to Mitch O'Farrell's campaign for City Council.

December 30, 2015

John Irwin, an executive of Townscape Management Partners, donates \$500 to Curren Price's campaign for City Council.

January 4, 2016

Mitch O'Farrell returns the \$500 contribution from Tyler Siegel.

January 20, 2016

Private meeting with Council member David Ryu, Ryu's senior planning deputy Renee Weitzer and, Ryu's chief of staff Sarah Dusseault and Townscape lobbyist from Marathon Communications Richard Lichtenstein,

Marathon Communications Gabe Kramer, Townscape founder Tyler Siegel, Townscape founder John Irwin, lobbyist Wendy Mitchell, Mok Wan and Annand Devarajan of Frank Gehry Parnters about EIR Comments and discuss outreach efforts and project process timeline.

June 17, 2016

Marathon Communication lobbyist Richard Lichtenstein meets privately with Ryu chief of staff Sarah Dusseault and Ryu deputy Julia Duncan.

June 22, 2016

John Irwin, an executive of Townscape Management Partners, donates \$700 to Karo Torossian's campaign for City Council.

June 22, 2016

Tyler Siegel of Townscape Partners donates \$700 to Karo Torossian's campaign for City Council.

June 28, 2016

John Irwin, an executive of Townscape Management Partners, donates \$700 to Joe Buscaino's campaign for City Council.

June 30, 2016

Townscape Management Inc donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016

Tyler Siegel of Townscape Management Partners donates \$700 to Felipe Fuentes's Officeholder Account.

June 30, 2016

John Irwin, an executive of Townscape Management Partners, donates \$700 to Paul Koretz's campaign for City Council.

June 30, 2016

Tyler Siegel of Townscape Management Partners donates \$700 to Joe Buscaino's campaign for City Council.

July 22, 2016

CD 4 staff hold follow up private meeting with developer lobbyist Richard Lichtenstein.

August 11, 2016

Private meeting with Council member David Ryu, deputy Julia Duncan and chief of staff Sarah Dusseault with developer Townscape Partners

What Did the Developer Get?

October 25, 2016

Planning Committee approves of "reduced" size development.

A mixed-use project that would anchor the eastern edge of the Sunset Strip received preliminary approval Tuesday night after developers agreed to a number of compromises, including a request to reduce the size of a proposed 15-story tower.

The Planning and Land Use Management Committee voted unanimously to approve the Frank Gehry-designed residential and commercial complex at Sunset and Crescent Heights boulevards. The committee delayed a vote on whether to preserve Lytton Savings, a 1960 bank building designed by architect Kurt Meyer on the project site.

The Los Angeles City Council is expected to sign off on the development next week.

The project at 8150 Sunset Blvd. includes two residential towers with a total of 229 units, including 38 for low-income residents; 65,000 square feet of commercial space; and a pedestrian plaza. ([Los Angeles Times, October 25, 2016](#))

November 1, 2016

Los Angeles City Council approves 8150 Sunset by a unanimous vote.

The Los Angeles City Council on Tuesday unanimously approved a mixed-use development designed by Frank Gehry that will anchor the eastern edge of the Sunset Strip.

The relatively swift approval of the project Tuesday was a contrast to last week's three-hour discussion on the famed architect's design for 8150 Sunset Blvd. The five-building complex at Sunset and Crescent Heights boulevards will include two residential towers, terraced gardens and a shopping center. ([Los Angeles Times, November 1, 2016](#))

November 15, 2016

John Irwin, an executive of Townscape Management Partners, donates \$700 to Jose Huizar's campaign for City Council.

November 16, 2016

Tyler Siegel of Townscape Management Partners donates \$700 to Jose Huizar's Officeholder Account.

December 2016

The Los Angeles Conservancy and the group Fix the City, which fights for updated infrastructure, environmental safeguards and other key problems created by major development, sues the City of Los Angeles for failing to comply with CEQA, the California Environmental Quality Act.

6. Sunset Palladium Tower: Miami Developer Crescent Heights

These dual skyscrapers, proposed at the corner of Sunset and Argyle at the location of the famed Palladium concert hall, were approved with height and density exemptions to override local zoning. AIDS Healthcare Foundation is suing the city for violating the City Charter and the California Environmental Quality Act.

December 27, 2012

Sonny Khan of Miami, an executive at Crescent Heights Employment Services, LLC donates \$700 to Alexander Cruz de Ocampo's campaign for City Council.

December 28, 2012

Crescent Heights donates \$700 to Matt Szabo's campaign for City Council.

February 15, 2013

Casey Max Klein, a managing director at Crescent Heights of America, donates \$700 to Matt Szabo's campaign for City Council.

February 19, 2013

Casey Max Klein, a managing director at Crescent Heights of America, donates \$700 to Alexander Cruz de Ocampo's campaign for City Council.

April 30, 2013

Sonny Kahn, the CEO of Crescent Heights, donates \$1,300 to Eric Garcetti's campaign for mayor.

June 19, 2013

Russell Galbut, co-founder of Crescent Heights donates \$700 to Mitch O'Farrell's campaign for City Council.

November 6, 2013

Private meeting with Councilmember Mitch O'Farrell and O'Farrell deputy Marie Rumsey and lobbyist Steve Afriat, Crescent Heights executive Bruce Menin and developer lobbyist Aaron Green

June 24, 2014

Private meeting with Councilmember O'Farrell, deputy Marie Rumsey, O'Farrell deputy Gary Benjamin and O'Farrell deputy Dan Halden and lobbyist Steve Afriat, Crescent Heights executive Bruce Menin, lobbyist Aaron Green, Crescent Heights attorney Cindy Starrett and Crescent Heights executive Adam Tartakovsky

January 20, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Wally Knox's campaign for City Council.

January 21, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Carolyn Ramsay's campaign for City Council.

February 2, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Joan Pelico's campaign for City Council.

February 4, 2015

Private meeting with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin and O'Farrell deputy Christine Peters and Crescent Heights exec. Bruce Menin, lobbyist Steve Afriat and lobbyist Aaron Green

February 6, 2015

Joan Pelico's campaign returns the \$700 contribution from CH Palladium.

February 10, 2015

Sonny Kahn, developer at Crescent Heights, donated \$700 to Jose Huizar's campaign for City Council.

February 11, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to Joan Pelico's campaign for City Council.

March 25, 2015

Private meeting with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin, and O'Farrell deputy Dan Halden and lobbyist Aaron Green and lobbyist Steve Afriat

April 27, 2015

CH Palladium, LLC, a subsidiary of Crescent Heights, donates \$700 to City Councilman Gilbert Cedillo's Officeholder Account.

June 25, 2015

Private meeting with Councilmember O'Farrell, O'Farrell deputy Jeanne Min, O'Farrell deputy Gary Benjamin, O'Farrell deputy Dan Halden and O'Farrell deputy Marisol Rodriguez and Crescent Heights executive Bruce Menin, Crescent Heights executive Adam Tartakovsky, Crescent Heights executive Elliot Kahn, developer lobbyist Steve Afriat and developer lobbyist Aaron Green

October 21, 2015

Private meeting with O'Farrell Staffer Chris Robertson and lobbyist Aaron Green

October 27, 2015

Private meeting with Councilmember O'Farrell, O'Farrell deputy Jeanne Min and O'Farrell deputy Chris Robertson and Crescent Heights executive Bruce Menin, Crescent Heights executive Adam Tartakovsky, developer John Kilroy of Kilroy Realty and Kilroy Realty exec. David Simon.

What Did Miami Developer Crescent Heights Get?

November 19, 2015

Los Angeles Planning Commission certified and adopted Environmental Impact Report and approved a General Plan Amendment to dramatically alter the land use, by a unanimous 7-0 vote.

December 10, 2015

Los Angeles Planning Commission approves Palladium development.

The Los Angeles City Planning Commission on Thursday backed a proposal for two 30-story residential towers in Hollywood, despite a challenge from the nonprofit group next door.

Commissioners praised the proposed Palladium Residences, saying the 731-unit project would provide much needed housing on a stretch of Sunset Boulevard served by bus routes and the nearby Metro Red Line subway.

"That housing should be near public transportation, and this is the perfect place for it," said commissioner Dana Perlman. ([Los Angeles Times, December 10, 2015](#))

January 19, 2016

Private meeting with Councilmember O'Farrell, O'Farrell deputy Jeanne Min and O'Farrell deputy Chris Robertson and Crescent Heights executive Bruce Menin and lobbyist Steve Afriat

What Did Miami Developer Crescent Heights Get?

February 2, 2016

Los Angeles City Planning Commission submits their findings, recommending amendments to Los Angeles General Plan to ignore the existing zoning and certifying the Environmental Impact Report.

March 2, 2016

Private meeting with O'Farrell Staffer Chris Robertson and developer lobbyist Aaron Green

What Did Developer Crescent Heights Get?

March 22, 2016

Los Angeles City Council unanimously approves Zone Change and Height District change by a unanimous 12-0-3 vote, overriding the existing zoning on the land.

March 23, 2016

Private meeting with O'Farrell Staffer Chris Robertson and lobbyist Aaron Green

7. Crossroads of the World Timeline: Morton La Kretz and Harridge Developers

This dual skyscraper would displace numerous families on Sunset Boulevard near Highland and seeks major exemptions from city zoning rules.

March 21, 2013

Morton La Kretz, founder of Crossroads Management, donates \$1,300 to Eric Garcetti's campaign for mayor.

April 1, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$1,300 to Eric Garcetti's campaign for mayor.

April 5, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mitch O'Farrell's campaign for City Council.

April 8, 2013

Morton La Kretz, founder of Crossroads Management, donates \$700 to Mitch O'Farrell's campaign for City Council.

April 25, 2013

Bradley Woome, the CFO at Harridge Development Group, LLC, donates \$250 to Mitch O'Farrell's campaign for City Council.

September 20, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mitch O'Farrell's campaign for City Council.

November 18, 2013

Private meeting with Councilmember Mitch O'Farrell and Morton La Kretz and Linda Duttonhaver of Crossroads Management.

November 22, 2011

Bradley Woome of Harridge Development Groups donates \$250 to Mitch O'Farrell's Officeholder Account.

November 22, 2013

David Schwartzman, CEO of Harridge Development Group, donates \$500 to Mitch O'Farrell's Officeholder Account.

September 30, 2014

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Marqueece Harris-Dawson's campaign for City Council.

January 6, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gloria Molina's campaign for City Council.

January 27, 2015

Marc Annotti of Harridge Development Group donates \$700 to Mitch Englander's campaign for City Council.

February 12, 2015

Marc Annotti of Harridge Development Group donates \$700 to Nury Martinez's campaign for City Council.

March 26, 2015

Yuri Gurevich, a consultant at Harridge Development Group, donates \$250 to Carolyn Ramsay's campaign for City Council.

March 26, 2015

James D. Hearn, an attorney at Harridge Development Group, donates \$700 to Carolyn Ramsay's campaign for City Council.

March 26, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Carolyn Ramsay's campaign for City Council.

March 26, 2015

Bradley Woomer of Harridge Development Groups donates \$700 to Carolyn Ramsay's campaign for City Council.

April 20, 2015

Private meeting with Councilmember Mitch O'Farrell, O'Farrell deputy Christine Peters, O'Farrell deputy Gary Benjamin and Crossroads attorney Jerry Neuman and Crossroads executive Linda Duttenhaver.

May 20, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$500 to Gil Cedillo's campaign for City Council.

May 29, 2015

First public announcement, two years into the private negotiations at City Hall, that the Crossroads multi-tower skyscraper project is being proposed by Harridge Development Group and Mort La Kretz.

As these preliminary renderings show, the Crossroads complex—which is both a Los Angeles Historic-Cultural Monument and on the National Register of Historic Places—will be completely "restored to its glory," says Glenn Gritzner, a rep for developer Harridge Development Group. (Crossroads owner Mort La Kretz will continue to control the land the project sits on.) The red-tile-roofed building between the Blessed Sacrament Church and the Crossroads' signature 30-foot spire (currently offices) is planned to be revamped as a market. All the Crossroads buildings would reopen as retail space.

In addition to the reintroduction of retail at the Crossroads, the project will create eight new mixed-use buildings rising on parts of the two blocks between the complex and Highland Avenue to the west, and the block

immediately to the north of the complex on Selma: a 308-room, 31-story hotel, a 32-story apartment tower, and a 30-story condo tower with 950 units total (including 70 units of designated affordable housing), 95,000 square feet of office space, and a total of 185,000 square feet of retail/commercial uses (including the 60,000 square feet at Crossroads). The shorter buildings range from two to six stories tall. All the new buildings would have retail and commercial components on the ground floor; parking for the complex—2,596 total spaces—would all be underground. ([Curbed Los Angeles, May 29, 2015](#))

June 30, 2015

Marc Annotti of Harridge Development Group donates \$700 to Jose Huizar's Officeholder Account.

October 2015

Initial Environmental Impact Report released.

November 2, 2015

Private meeting with O'Farrell Staff Christine Peters, O'Farrell deputy Chris Robertson, O'Farrell deputy Dan Halden with attorney Jerry Neuman.

November 10, 2015

Private meeting with O'Farrell Staff Chris Robertson, O'Farrell deputy Christine Peters, O'Farrell deputy Dan Halden with attorney Jerry Neuman.

November 12, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Bob Blumenfield's campaign for City Council.

November 14, 2015

Public scoping meeting held to, allowing the public to see the skyscraper multi-tower plan.

December 23, 2015

James Hearn, an attorney at Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

December 23, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

December 30, 2015

James Hearn, an attorney at Harridge Development Group, donates \$250 to Herb Wesson's Officeholder Account.

December 30, 2015

Bradley Woomer of Harridge Development Groups donates \$700 to Curren Price's campaign for City Council.

December 30, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Curren Price's campaign for City Council.

December 31, 2015

James D. Hearn, general counsel at Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2015

Bradley Woomer of Harridge Development Groups donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2015

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

August 5, 2016

James Hearn, an attorney at Harridge Development Group, donates \$700 to Mike Bonin's campaign for City Council.

August 5, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Herb Wesson's campaign for City Council.

August 5, 2016

Bradley Woomer of Harridge Development Groups donates \$250 to Herb Wesson's campaign for City Council.

August 16, 2016

Asked City Hall for "CEQA streamlining" to avoid complying with California Environmental Quality Act rules. Seeks Zone Change and Height District Change exemptions from the City Council to override existing land-use zoning.

August 26, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Joe Buscaino's campaign for City Council.

August 26, 2016

Bradley Woomer of Harridge Development Groups donates \$500 to Joe Buscaino's campaign for City Council.

September 26, 2016

Private meeting with Councilmember O'Farrell, O'Farrell deputy Amy Ablakat, O'Farrell deputy Christine Peters, O'Farrell deputy Dan Halden with Friends of Hollywood Central Park president Laurie Goldman, Harridge executive David Schwartzman, developer lobbyist Kyndra Casper

September 28, 2016

Marc Annotti of Harridge Development Group donates \$100 to Karo Torossian's campaign for City Council.

December 1, 2016

David Schwartzman, CEO of Harridge Development Group, donates \$700 to Gil Cedillo's campaign for City Council.

December 31, 2016

Gil Cedillo's campaign returns \$700 donation to David Schwartzman.

What Did Developer Morton La Kretz/Harridge Get?

Nothing — yet. The developers are currently working on the Environmental Impact Report to justify this megadevelopment to the L.A. City Planning Commission, [which approves 90% of all major land-use changes brought before it, according to a Los Angeles Times investigation.](#)

8. NoHo West Timeline: Merlone Geier and Goldstein

Planting Investments

(The NoHo West luxury housing/mall complex is known as a Black Lung Loft—freeway-adjacent new housing that allows children to reside there. USC's seminal Children's Health Study has found these developments result in high levels of lifelong lung damage among children, and USC researchers have testified before the [City Council to end their practice of encouraging and granting favors to the developers of Black Lung Lofts](#), [Los Angeles Times](#). [L.A. Weekly Black Lung Lofts](#).)

April 31, 2014

Cliff Goldstein, the founder and managing partner of GPI Companies, gives \$700 to Mitch Englander's campaign for City Council.

May 29, 2014

Private meeting with Krekorian Chief of Staff Areen Ibranossian and Cliff Goldstein of GPI Companies.

June 3, 2014

Clifford Goldstein, founder and managing partner of GPI Companies, donates \$700 to Jose Huizar's campaign for City Council.

June 3, 2014

Lee Wagman, a partner at GPI Companies, donates \$700 to Jose Huizar's campaign for City Council.

July 28, 2014

Private meeting with Laurel Grove neighborhood leader Diann Corral who opposes the size and density of the proposed luxury housing/mall complex, Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman, CD2 Chief of Staff Areen Ibranossian, Ken and Barbe, GPI exec. Clifford Goldstein, Mike Grehl.

October 30, 2014

Private meeting with Claire Bronowski, Chad Doi, Krekorian deputy Doug Mensman, Gregg Vandergriff, Krekorian deputy Karo Torossian, Kit Awakuni, Nicholas Hendricks, Robert Duff, Simon Pastucha, GPI exec. Clifford Goldstein, Jameson Lee, Mike Grehl and Lincoln Lee.

December 12, 2014

T.R. Gregory, a partner at GPI Companies, gives \$250 to Carolyn Ramsay's City Council campaign.

December 12, 2014

Barbara Wagman, a partner at GPI Companies, gives \$250 to Carolyn Ramsay's City Council campaign.

December 17, 2014

Private meeting with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian and lobbyist Ira Handelman

December 31, 2014

C. Drew Planting, a managing partner at GPI Companies, gives \$500 to Carolyn Ramsay's campaign for City Council.

January 14, 2015

Private meeting with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian, GPI exec. Clifford Goldstein and Mike Grehl.

January 15, 2015

Private meeting with Arlene Simon, neighborhood activist Diann Corral, Krekorian deputy Doug Mensman, lobbyist Ira Handelman, Krekorian deputy Karo Torossian, Mike Grehl, Susan Ware, GPI exec. Clifford Goldstein

January 16, 2015

Private meeting with Krekorian deputy Doug Mensman, Krekorian deputy Karo Torossian, GPI exec. Clifford Goldstein, Mike Grehl, Ernesto Hidalgo, lobbyist Ira Handelman, Sam Sonarch, Terri Foster and Mary Garcia.

April 30, 2015

Private meeting with lobbyist Ira Handelman, Merlone Geier exec. Scott McPherson, Krekorian deputy Karo Torossian and CD2 Chief of Staff Areen Ibranossian.

June 26, 2015

Lee Wagman of GPI Companies gives \$1,400 to Eric Garcetti's campaign for mayor.

June 30, 2015

Lobbyist Ira Handelman, Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman, Ian Thompson.

June 30, 2015

Jonathan Lischke of GPI Companies donates \$1,400 to Eric Garcetti's campaign for mayor.

July 30, 2015

Renderings revealed for NoHo West.

Architectural renderings have emerged for NoHo West, a proposed development which would transform North Hollywood's 25-acre Laurel Plaza shopping center into a mixed-use community.

The project - which is being developed by a joint venture between Goldstein Planting Investments and Merlone Geier Partners - would include a series of low-rise structures featuring apartments, retail and commercial office space.

The commercial heart of NoHo West would be Laurel Plaza Drive, a main street slicing diagonally through the development site. Images displayed on the project's official website portray a four-block pedestrian paseo, lined with trees and flanked by shops and restaurants. An elliptical plaza would sit at the mid-point of the paseo, offering water features, landscaping and outdoor seating.

According to plans filed with the City of Los Angeles, the project would include 190,000 square feet of retail and restaurant space, as well as a gym, a supermarket and a cinema multiplex. These uses would be served by approximately 2,600 parking spaces, to be located in an eight-story structure abutting the 170 Freeway. ([urbanize.LA, July 30, 2015](#))

July 31, 2015

C. Drew Planting, a managing partner at GPI Companies, gives \$1,400 to Mitch O'Farrell's Legal Defense Fund Account.

July 31, 2015

Clifford Goldstein, founder and managing partner of GPI Companies gives \$1,400 to Mitch O'Farrell's Legal Defense Fund.

August 18, 2015

A huge private "Major Development Services Meeting" involving dozens of City Employees working to pave the way for the project. with Ara Sargsya, Assistant Deputy Superintendent of Building at City of Los Angeles; Ashley Atkinson, Planning and Housing specialist, Mayor's office of economic development; Bob Stone, Advisor to Deputy Mayor for Economic Development at City of Los Angeles; Carl Mills, Charlie Rausch, Associate Zoning Administrator and Manager of Major Project Section at City of Los Angeles, Department of City Planning; Colin Kumabe, Sr. Structural Engineer at City of Los Angeles; Estineh Mailian, Senior City Planner at City of Los Angeles; Frank Bush, General Manager of the L.A. Department of Building and Safety; Hani Malki, Ifa Kashefi, Joel Jacinto, Commissioner at Los Angeles Board of Public Works; Karo Torossian, Kevin Keller, Deputy Director, Los Angeles Department of City Planning ;Larry Galstian, Assistant Bureau Chief at City of Los Angeles; Millena Zasadzien, City Planner at City of Los Angeles; Nicholas Marichich, Director of Planning Policy and Development at Office of Los Angeles Mayor Eric Garcetti; Osama Younan, Division Chief at City of Los Angeles; Peter Kim, Senior Structural Engineer at City of Los Angeles, Department of Building and Safety; Regine Osorio, Student Worker at City of Los Angeles Building and Safety; Shahen Akelyan, Verej Janoyan, Wesley Tabijiri, Chen-Yu Kuo, Greg Spotts, Assistant Director, Bureau of Street Services at City of Los Angeles; John Vidovich, Deputy Chief - Fire Marshal at Los Angeles Fire Department; John Weight, Pascal Challita, Raymond Chan, General manager of Dept. of Building and Safety; Seleta Reynolds, Vince Bertoni, Ed Ebrahimian, General Manager/Director Bureau of Street Lighting at City of Los Angeles; Marvin Moon, Nazario Saucedo.

August 20, 2015

Lee Wagman of GPI Companies gives \$700 to Marqueece Harris-Dawson's Officeholder Account.

September 3, 2015

Private meeting with lobbyist Ira Handelman, Merlone Geier executive Scott McPherson, Krekorian deputy Karo Torossian and Krekorian Chief of Staff Areen Ibranossian.

December 12, 2015

Jonathan Lischke of GPI Companies gives \$700 to Councilman Mitch O'Farrell's campaign for City Council.

December 14, 2015

Private meeting with GPI executive Cliff Goldstein, Merlone Geier executive Scott McPherson, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian.

December 18, 2015

Clifford Goldstein, founder and managing partner of GPI Companies, gives \$700 to Mitch O'Farrell's campaign for City Council.

December 22, 2015

C. Drew Planting, a managing partner at GPI Companies, gives \$700 to Mitch O'Farrell's campaign for City Council.

January 12, 2016

Private meeting with Krekorian deputy Karo Torossian, Claire Bronowski, Chirs Joseph, David Geiser, Krekorian deputy Doug Mensman, Jauld-altoonpartners, Jacqueline Murphy, Jose Sanchez, Lisa Webber, Milena Zasadzien, Matthew Stone, Nicholas Hendricks, Merlone Geier exec. Scott McPherson, Stacie Henderson.

January 22, 2016

Private meeting with Merlone Geier Scott McPherson, GPI exec. Cliff Goldstein, Krekorian deputy Karo Torossian, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian.

March 8, 2016

Private meeting with Merlone Geier exec. Scott McPherson and CD2 Chief of Staff Areen Ibranossian.

July 7, 2016

Private meeting with neighborhood activist opposing the project, Diann Corral, Krekorian deputy Karo Torossian, Krekorian deputy Doug Mensman and CD2 Chief of Staff Areen Ibranossian.

July 7, 2016

Private meeting with CD deputy Karo Torossian, lobbyist Ira Handelman and Stephen Logan.

August 4, 2016

Private meeting with Merlone Geier exec. Scott McPherson, Stephen Logan, Krekorian deputy Karo Torossian, Krekorian Chief of Staff Areen Ibranossian and Councilmember Paul Krekorian

September 1, 2016

Private meeting with Merlone Geier exec. Scott McPherson, Krekorian deputy Karo Torossian and Krekorian Chief of Staff Areen Ibranossian.

What Did the Developer Get?

September 22, 2016

Los Angeles Planning Commission approves proposal for NoHo West. Paul Krekorian spoke in favor of the development at the hearing. The Planning Commission, following its 90% approval rate for overriding existing zoning, recommended to the City Council that Zone Change and Height Change be adopted to override existing zoning on the land.

The Los Angeles Planning Commission on Thursday backed a proposal for NoHo West, a residential and commercial development planned on the site of the old Laurel Plaza shopping center and soon-to-be-shuttered Macy's in North Hollywood.

If approved by the city, NoHo West would bring 642 rental housing units, 256,000 square feet of office and retail use, and 316,000 square feet of new commercial development, including a cinema, to the 25-acre site.

The development — at the corner of Laurel Canyon Boulevard and Oxnard Street — is a joint venture between Merlone Geier Partners and GPI Co.

Los Angeles Councilman Paul Krekorian, who represents North Hollywood, spoke in favor of NoHo West at Thursday's hearing. He also sent a letter to the commission last week, calling the development "a shot of adrenaline to the area by delivering retail and entertainment facilities for the community." ([Los Angeles Daily News, September 22, 2016](#))

September 25, 2016

Councilmember Paul Krekorian writes letter in support of project.

December 12, 2016

C. Drew Planting, a managing partner at GPI Companies, gives \$560 to Mitch O'Farrell's Officeholder Account.

What Did the Developer Get?

December 14, 2016

In a [surprise vote in which Laurel Grove activists were given just 24-hours notice to object](#), Los Angeles City Council by a unanimous 14-0 vote approves of the project by implementing the Zone Change and Height Change recommended by the Planning Commission.

9. Clarendon Luxury Complex Timeline: Developer AMCAL Housing

(Clarendon would demolish the existing Woodland Hills Post Office less than 200 feet from the 101 Freeway at Topanga Canyon Blvd. It is known as a Black Lung Loft—freeway-adjacent new housing that allows children to reside there. USC's seminal Children's Health Study has found these developments result in high levels of lifelong lung damage among children, and USC researchers have testified before the City Council to end their practice of [encouraging and granting favors to the developers of Black Lung Lofts](#). [Los Angeles Times](#) and [L.A. Weekly, Black Lung Lofts](#).)

August 29, 2005

AMCAL General Contractor's Inc donates \$500 to Jose Huizar's campaign for City Council.

December 4, 2008

AMCAL Multi-Housing Corp donates \$500 to Herb Wesson's campaign for City Council.

February 17, 2009

AMCAL Multi-Housing Corp donates \$500 to Eric Garcetti's campaign for City Council.

December 23, 2010

AMCAL General Contractors, Inc donates \$500 to Jose Huizar's campaign for City Council.

December 13, 2011

AMCAL Multi-Housing Corp donates \$1,000 to Eric Garcetti's campaign for mayor.

March 12, 2012

Percival Vaz, the CEO of AMCAL Multi-Housing, Inc, donates \$500 to Jose Huizar's campaign for City Council.

May 1, 2012

Maurice Ramirez, a developer of AMCAL Housing, donates \$1,000 to Eric Garcetti's campaign for mayor.

April 4, 2013

J. Maurice Ramirez, executive vice president of AMCAL Housing, donates \$200 to Curren Price's campaign for City Council.

April 9, 2013

Percy Vaz, CEO of AMCAL Multi-Housing, donates \$500 to Nury Martinez's campaign for City Council.

April 16, 2013

Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 7, 2013

Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 11, 2013

Maurice Ramirez, executive vice president of AMCAL Housing, donates \$250 to Eric Garcetti's campaign for mayor.

May 13, 2013

J. Maurice Ramirez, a developer at AMCAL Multi-Housing, donates \$100 to Mitch O'Farrell's campaign for City Council.

April 22, 2015

Private meeting with BOB BLUMENFIELD deputy Cesar Diaz, BOB BLUMENFIELD deputy Andrew Pennington, Darin Hansen of AMCAL, Eric Leiberman of QES, Inc.

June 5, 2015

Private meeting with BOB BLUMENFIELD deputy Andrew Pennington, BOB BLUMENFIELD deputy Cesar Diaz, Darin Hansen of AMCAL and Eric Leiberman of QES, Inc.

June 22, 2015

AMCAL Multi-Housing Corp donates \$700 to Jose Huizar's campaign for City Council.

September 3, 2015

Private meeting with BOB BLUMENFIELD deputy Andrew Pennington, Councilmember Bob Blumenfield, and Percy Vaz of AMCAL.

November 12, 2015

Private meeting with BOB BLUMENFIELD deputy Andrew Pennington, Darin Hansen of AMCAL and Eric Leiberman of QES, Inc.

April 5, 2016

AMCAL Multi-Housing LLC donates \$500 to Marqueece Harris-Dawson's campaign for City Council.

June 2, 2016

Draft EIR report published on project.

A draft environmental impact report published by the Los Angeles Department of City Planning has revealed AMCAL Multi Housing Company's proposal for a new apartment complex on the site of the Woodland Hills Post Office.

The proposed Clarendon Street Apartments, slated for a 4.2-acre site at 22055-22147 Clarendon Street, would consist of a five-story building features 335 studio, one-, two- and three-bedroom apartments, in addition to enclosed parking accommodations for 564 vehicles and 369 bicycles. Plans also call for a variety of open space amenities, including three courtyards, a fitness center, a dog park and a club room.

The podium-style development, designed by Architects Orange, would be clad with a variety of exterior materials, including plaster, perforated metal, stone veneer and stucco.

The project would also incorporate a number of green building features such as energy star appliances and fixtures, a rooftop trellis system and permeable pavers for rainwater harvesting.

Construction would occur over approximately 18 months in a single phase. A groundbreaking date is currently unknown. ([urbanize.LA, June 9, 2016](#))

July 1, 2016

Maurice Ramirez, a developer at AMCAL, donates \$250 to Curren Price's campaign for City Council.

July 21, 2016

Private meeting with BOB BLUMENFIELD deputy Andrew Pennington, Abraham Mercado of Consensus Inc, Eric Leiberman of QES, Inc, Darin Hansen of AMCAL, Josh Gertler of Consensus Inc.

What Did Developer AMCAL Get?

November 17, 2016

Los Angeles Planning Commission recommended Height District and Zoning Changes for the project, continuing their 90% approval of major zone changes.

January 20, 2017

Project referred to Planning and Land Use Management Committee by City Council.

March 3, 2017

LA City Council approved project with Zone Change and Height District change.

10. Martin Expo Town Center: Martin Automotive Group

Owners of Martin Cadillac at Bundy and Olympic are trying to build a 10-story luxury housing office tower megadevelopment of 807,200 square feet. Westsiders Opposed to Overdevelopment are suing the City for failing to address its significant traffic impacts and environmental impacts.

June 4, 2012

Martin Automotive Group donates \$700 to Bill Rosendahl's campaign for City Council.

November 27, 2012

Martin Automotive Group donates \$500 to Mike Bonin's campaign for City Council.

January 29, 2013

Private meeting between Bonin Councilmember Mike Bonin with Jaime Rojas and lobbyist Steven Afriat about Martin Cadillac.

June 6, 2013

Martin Automotive Group donates \$500 to Eric Garcetti's campaign for mayor.

August 21, 2013

Private meeting with lobbyist Steve Afriat, Noel Fleming, Bonin deputy Tricia Keane and Bonin chief of staff Chad Molnar.

December 5, 2013

Private "Martin Expo Town Center Design Meeting" with Bonin deputy Tricia Keane, LA city planner Luciralia Ibarra, lobbyist Phil Simmons, Simon Pastucha and Tom Hsieh.

September 5, 2014

Private meeting at Planning with Chris Robertson, J Miller, lobbyist Philip Simmons, Simon Pastucha, Tom Hsieh and Bonin deputy Tricia Keane.

October 23, 2014

Private Martin Expo Town Center Meeting with Chris Robertson, Bonin deputy Claudia Luna and Bonin deputy Tricia Keane.

November 2014

Draft EIR Report published.

November 19, 2014

Private Martin Expo Town Center Meeting with Chris Robertson, Bonin deputy Tricia Keane and Bonin deputy Paul Backstrom.

January 21, 2015

Private meeting with Bonin staff and lobbyists Steve Afriat and Aaron Green.

September 17, 2015

Private meeting with lobbyist Steve Afriat, Bonin deputy Tricia Keane, Chris Robertson and Councilmember Mike Bonin.

December 2015

Final Environmental Impact Report published for the project.

February 9, 2016

Private meeting with Bonin deputy Tricia Keane and Councilmember Mike Bonin.

April 13, 2016

Martin Automotive Group donates \$300 to Gil Cedillo's campaign for City Council.

April 18, 2016

Private meeting with Bonin deputy Tricia Keane, Bonin deputy Ezra Gale, Dave Bantz, lobbyist Phil Simmons and Tom Perkins on METC design.

April 20, 2016

Private meeting between Bonin deputy Tricia Keane, Bonin deputy Ezra Gale, Bonin deputy Marietta Torriente, lobbyist Steve Afriat and Councilmember Mike Bonin.

May 4, 2016

Private meeting between lobbyist Joel Miller and Bonin deputy Tricia Keane.

May 10, 2016

Private meeting between Martin Automotive Group CEO Dan Martin and Councilmember Mike Bonin.

May 11, 2016

Private call between lobbyist Steve Afriat and Bonin deputy Tricia Keane.

May 13, 2016

Private call between Martin Automotive Group CEO Dan Martin, Bonin deputy Tricia Kean, and land-use attorney Alex DeGood.

May 17, 2016

Private call between Bonin deputy Tricia Keane, Martin Automotive Group CEO Dan Martin and lobbyist Philip Simmons.

May 20, 2016

Private call between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin.

May 24, 2016

Private call between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin

May 25, 2016

Private call between Bonin deputy Tricia Keane, attorney Alex DeGood and Martin Automotive Group CEO Dan Martin.

What Did Developer Martin Cadillac (Martin Automotive) Get?

May 26, 2016

Planning Commission approves by an 8-0-1 (unanimous vote, 1 absent) vote for a General Plan Amendment, a vesting zone change and a Height District change to override existing zoning and recommends action to City Council, continuing its 90% approvals of overriding city zoning rules.

May 27, 2016

Private call between Bonin deputy Tricia Keane and Martin Automotive Group CEO Dan Martin.

May 28, 2016

Private meeting between lobbyist Steve Afriat, Martin Automotive Group CEO Dan Martin and Bonin Chief of Staff Chad Molnar.

June 8, 2016

Private "Signal Discussion" with attorney Alex DeGood, Martin Automotive Group CEO Dan Martin, Tom Gaul and Bonin deputy Tricia Keane.

June 30, 2016

Private call between lobbyist Steve Afriat and Bonin deputy Tricia Keane.

July 15, 2016

Private meeting with Bonin deputy Ezra Gale, Aaron (No last name given, probably lobbyist Aaron Green), Len Nguyen, Don Swiers and a redacted name.

August 3, 2016

Private meeting with lobbyist Steve Afriat, Bonin deputy Tricia Keane and Bonin Chief of Staff Chad Molnar.

August 12, 2016

Private meeting with Aaron (No last name given, probably lobbyist Aaron Green), Bonin deputy Ezra Gale, Len Nguyen, neighborhood activist Xochitl Gonzalez and a redacted name.

August 15, 2016

Private meeting with Martin Automotive Group CEO Dan Martin and likely L.A. City Councilmember Mike Bonin.

August 22, 2016

Private meeting with Bonin deputy Tricia Keane and Councilmember Mike Bonin.

What did Developer Martin Cadillac Get?

September 20, 2016

The Los Angeles City Council, by a 12-0-3 vote, unanimously approves a General Plan Amendment and Zone Change, overriding existing zoning for the land.

September 21, 2016

Private conference call with Bonin deputy Tricia Keane, attorney Alex DeGood, lobbyist Phil Simmons, Sharon Dickinson of PLUM.

September 30, 2016

Mayor Garcetti transmits his approval of council action.

October 17, 2016

Martin Automotive Group donates \$250 to Curren Price's campaign for City Council.

11. Alexan 27-Story Skyscraper: Developer Trammell Crow of Texas

This luxury tower in DTLA would obliterate most viewpoints Angelenos have of the historic 1930s Art Deco Eastern Columbia Building, a famed L.A. landmark. The Society for the Preservation of Downtown L.A. and other historic preservationists are fighting the project.

October 10, 2010

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Paul Krekorian's campaign for City Council.

October 11, 2011

Brad Cox, a real estate investor at Trammell Crow Company, donates \$500 to Eric Garcetti's Officeholder Account.

December 8, 2011

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bill Rosendahl's campaign for City Council.

September 24, 2012

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Eric Garcetti's campaign for mayor.

October 14, 2012

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Mike Bonin's campaign for City Council.

December 22, 2012

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bob Blumenfield's campaign for City Council.

August 26, 2013

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Nury Martinez's campaign for City Council.

November 13, 2013

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Jose Huizar's campaign for City Council.

July 31, 2014

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Mike Bonin's campaign for City Council.

April 22, 2015

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Marqueece Harris-Dawson's campaign for City Council.

August 5, 2015

Private meeting with Councilmember Jose Huizar, JOSE HUIZAR deputy Kevin Ocubillo, lobbyist Morrie Goldman and Trammell Crow Residential

September 10, 2015

E. Garth Erdossy, a real estate developer at Trammell Crow Residential, donates \$700 to Jose Huizar's campaign for City Council.

October 23, 2015

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Curren Price's campaign for City Council.

October 28, 2015

Private meeting with lobbyist Morrie Goldman and JOSE HUIZAR staffers Clare Eberle and Shawn Kuk, and JOSE HUIZAR chief of staff Paul Habib.

November 17, 2015

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$700 to Marqueece Harris-Dawson's Officeholder Account.

December 9, 2015

Private meeting with JOSE HUIZAR deputy Clare Eberle, Estela Lopez, John Readey of Trammell Crow, Kelly Farrell of Callison RTKL, JOSE HUIZAR chief of staff Paul Habib, Sara Hernandez and JOSE HUIZAR deputy Shawn Kuk

February 2, 2016

Private meeting with JOSE HUIZAR deputy Shawn Kuk, Alex Irvine and John Ready of Trammell Crow.

March 13, 2016

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Bob Blumenfield's campaign for City Council.

March 22, 2016

Private meeting with Councilmember Jose Huizar, Huizar's deputy Shawn Kuk with Trammell Crow Residential.

May 1, 2016

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Mitch O'Farrell's campaign for City Council.

June 29, 2016

Private meeting with JOSE HUIZAR deputy Paul Habib, JOSE HUIZAR deputy Shawn Kuk, Martin Schlageter and John Readey of Trammell Crow.

June 30, 2016

Bradley Cox, a real estate investor at Trammell Crow Company, donates \$500 to Paul Koretz's campaign for City Council.

October 12, 2016

A DTLA neighborhood group hires California Environmental Quality Act Attorney Robert Silverstein, renowned for halting development projects where the City Council has overridden the existing zoning.

The battle over a tower proposed right next to the Eastern Columbia Lofts, the majestic turquoise Art Deco building in Downtown Los Angeles, is heating up, and the tower's opponents have an ace up their sleeve: Robert Silverstein, the Pasadena attorney best known for bringing construction on the East Hollywood Target to a halt.

Silverstein is representing a group of Downtown residents in their appeal of the city planning department's approval of the tower. Called the Alexan, it would rise 27 stories from a parking lot at the corner of 9th and Hill. That's tall enough to block views of the Eastern Columbia's iconic clock tower, and opponents, who have organized under the name Society for the Preservation of Downtown Los Angeles, say the new structure just doesn't jive with the neighborhood's character. ([Curbed Los Angeles, October 12, 2016](#))

What Did Developer Trammell Crow Get?

October 25, 2016

Central Area Planning Commission rules against the community, which had appealed the project, voting that the new skyscraper does not need an Environmental Impact Report on its effects on the community, and allowing it to move forward without an environmental assessment.

December 12, 2016

E. Garth Erdossy, a real estate developer at Trammell Crow Residential, donates \$700 to Jose Huizar's campaign for City Council.

12. Ferrante Luxury Complex: Developer Geoff Palmer

(Ferrante is a Black Lung Loft—1,500 units, Harbor Freeway adjacent luxury housing that allows children. Developer Geoff Palmer specializes in complexes beside freeways, and has

*been allowed by the LA City Council to build **three** megadevelopments without an Environmental Impact Report on the projects' dangers to children. USC's seminal Children's Health Study found these developments result in high levels of lifelong lung damage among children. USC researchers testified to the City Council to end their practice of [encouraging and granting favors to the developers of Black Lung Lofts](#). [Los Angeles Times](#), [L.A. Weekly: Black Lung Lofts](#).*

March 9, 2006

Geoff Palmer, owner of GH Palmer Associates, donates \$500 to Jose Huizar's campaign for City Council.

September 23, 2010

Geoff Palmer, owner of GH Palmer Associates, donates \$500 to Jose Huizar's campaign for City Council.

March 19, 2014

Meeting with Cedillo's deputy Gerald Gubatan and GH Palmer Associates vice-president Darrel Malamut

April 23, 2015

Meeting with Cedillo's deputy Gerald Gubatan, GH Palmer Associates exec. Darrel Malamut, Blake Lamb, Jennifer Karmels, Sergio Infanzon.

November 10, 2015

Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Gil Cedillo's campaign for City Council.

November 19, 2015

Meeting with Councilmember Gil Cedillo, Cedillo's senior planning deputy Gerald Gubatan, GH Palmer Associates senior vice-president Darrel Malamut.

February 4, 2016

Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Mike Bonin's campaign for City Council.

What Did Developer Geoff Palmer Get?

March 29, 2016

The City Department of Planning announces that Palmer needs only to produce a "mitigated negative declaration" of his project's environmental effects, and not a full Environmental Impact Report that would address the serious health risks warned by US.

June 6, 2016

Lunch between Councilmember Gil Cedillo, senior planning deputy Gerald Gubatan and Geoff Palmer at Central Kitchen at The Lorenzo.

June 30, 2016

Meeting at Checkers Hilton Restaurant in DTLA with Councilmember Gil Cedillo, Cedillo's chief of staff Arturo Chavez, senior planning deputy Gerald Gubatan and GH Palmer vice-president Darrel Malamut.

June 30, 2016

Geoff Palmer, owner of GH Palmer Associates, donates \$700 to Gil Cedillo's Officeholder Account.

(See on next page, the contributions made to City Hall politicians and candidates, and lobbying money spent to influence City Hall, by the above developers.)

What They've Spent on City Hall

Total campaign & lobbying on City Hall politicians/candidates: **\$11.1 million.**

Rick Caruso: 2000-2016

\$418,000 in campaign and lobbying cash

Michael Hakim and Colony Holdings: 2005-2015

\$1.2 million in campaign, lobbying, and City Hall trust fund cash

Carmel Partners: 2013-2016

\$545,476 in campaign and lobbying cash

Kanon Ventures: 2001-2015

\$369,775 in campaign and lobbying cash

Townscape Partners: 2013-2016

\$832,370 in campaign and lobbying cash

Crescent Heights: 2000-2016

\$2.6 million in campaign and lobbying cash

Crossroads of the World, Mort La Kretz and Harridge Development:
2004-2016

\$1 million in campaign and lobbying cash

Merlone Geier and Goldstein Planting Investments: 2008-2015

\$428,431 in campaign and lobbying cash

AMCAL: 2000-2016

\$245,577 in campaign contributions and lobbying cash

Martin Automotive Group: 2012-2016

\$762,771 in campaign and lobbying cash

Trammell Crow: 2000-2016

\$1.9 million in campaign and lobbying cash

Geoff Palmer: 1999-2016

\$886,599 in campaign and lobbying cash



'Non-Profit' Developments

1 message

John Redd [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Wed, Jan 30, 2019 at 2:15 PM

To Whom It May Concern -

A serious in-depth look needs to be made into some of these so-called 'non-profit' developers - such as the Venice Community Housing Corporation and the Hollywood Community Housing Corporation.

They've been granted multi \$100+ million dollar projects on some of the most expensive property the City owns. Neither of these groups have ever developed anything of this scale before. I learned their salaries are apparently connected directly to the 'operating costs' of each project, so the bigger the better. Some of the top executives compensations will be tripled if these projects are built.

Many of us find it VERY SUSPECT that Mike Bonin has concentrated the majority of his homeless propositions in one square mile area. All for the significant benefit of the Venice Community Housing Corp. Someone needs to look into the 'donations' they've been given. I wouldn't be surprised if some substantial ones were made by the developers of these over-sized, mega-projects. All of them seeking to circumvent CEQA, Coastal Commission restrictions, and an Environmental Impact Report.

Bonin gives them the sites they want in his district, and in return the developers donate to VCHC and possibly other 'non-profits' who support him.

We are all very concerned with the shady developments taking place in our city. It can't only be the Huizar Family.

Thank you,
Jonathon



Banning Developer Contributions

1 message

Alix Gucovsky [REDACTED]
To: ethics.policy@lacity.org

Wed, Jan 30, 2019 at 11:02 AM

To the Ethics Commission,

In light of the recent FBI investigation into Huizar, Curren Price, and other members of City Hall and LADBS, it is now more critical than ever that legislation is passed to ban "behest" payments from developers. In addition there needs to be a full investigation into the Mayor's Fund.

While our politicians must report with ethics any donations to campaigns, there are still ways for big monied interests to circumvent the process and funnel monies to our council members to influence their decisions.

Any legislation passed, should also be reviewed and amended yearly, as we can be certain that monied interests will continue to look for loopholes.

Some ideas, all politicians should be required to disclose what charities they are supporting, what charitable events they are attending, and who they are seated with at these events.

The public should have full and transparent access to schedules and meetings.

In an ideal world there should be a full ban on developer contributions and no closed door meetings. For controversial developments and meetings there should always be a community member present.

Given the growing importance of LADOT and METRO and the connection between transit and building the above should apply to the LADOT and METRO as well. This cannot be a back door around disclosures.

Ethics should give priority to this issue.

Thank you

Venice resident

Alix Gucovsky



Excessive influence by developers on LA planning decisions

1 message

James Richman [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Mon, Jan 28, 2019 at 12:42 PM

To Whom It May Concern:

I support a thorough investigation into whether developers have had an excessive influence on the approval process for projects in LA. Special treatment for developers rooted in their making donations and "behest" contributions is NOT in the interests of the residents of LA.

A ban on donations and "behest" contributions by developers would probably be easily worked around, but still would send a public policy message on how business should be conducted in LA.

Jim Richman



Campaign Finance Reform for Los Angeles!

1 message

Mon, Jan 28, 2019 at 11:00 AM

To: ethics.policy@lacity.org

Cc: [REDACTED]

January 28, 2019

Good Morning Ethics Commission,

Thank you for finally taking action on February 19, 2019 regarding the many issues of "Campaign Finance Reform" in Los Angeles and hear the voice of the voting public. Take "Big" money contributions out of representative politics. You would be performing a blessing.

The investigation by the FBI's Corruption Probe into Los Angeles City Hall "Pay to Play" has opened the door for much needed dialogue and changes to the influence that certain groups have politically and financially in local elections. Equal representation is the cornerstone of democracy and the fact of unlimited and shielded money in politics questions that idea now more than ever.

There has been a lot of interest and concern about improper and ill-suited zoning and development that has taken place in all communities of Los Angeles. I as a citizen feel that my voice is not equal to those with deep pockets like developers, builders, foreign investors, or unions who contribute serious amounts of money to elected politicians. We the people elect the politicians but they do not hear our voice as we sense and see that "money talks."

I am an informed stakeholder and participate in my Neighborhood Council and am very aware of the need for these changes. It is time for a ban on campaign contributions from developers, builders, unions, and foreign investors and a ban on "behest" payments which we know are large donations made to elected officials "favorite charities." No one is going to guarantee that this ban is going to stop dishonest conduct but it can certainly make it more difficult to participate in.

The call to remove the influence of money over elected officials is that we the voting public will be the recipients and hopefully have fair and unbiased representation by our elected legislators in matters that concern our city and communities.

Sincerely,

Anita Goldbaum
North Hills, California 91343



No donations from developers

1 message

Selene Ting [REDACTED]
To: ethics.policy@lacity.org

Mon, Jan 28, 2019 at 9:44 AM

Dear Ethics Commission,

I have always suspected real estate developers were getting sweetheart deals from the city in exchange for contributions. What else explains all this building without regard to all the problems these new developments cause - such as rents going up, affordable housing being lost, traffic jamming streets, construction on top of earthquake faults, blue skies being blocked, etc?

I have no time for a long letter. I just want you to know that there should definitely be a ban on campaign contributions and behest donations. It's time for this to stop.

Thanks.

Selene Ting
[REDACTED]



Comment on Developer Rules

1 message

Mon, Jan 28, 2019 at 8:49 AM

[REDACTED]
to: ethics.policy@lacity.org

NO private meetings.

NO bribes disguised as "charitable contributions."

ALL developer political donations publicly listed.

Our City's broken development process has sown mistrust and mayhem across Los Angeles. Let's fix a broken system.

Michael Konik
Hollywood, 90046



Corruption Probe

1 message

Jan Roberts [REDACTED]
To: ethics.policy@lacity.org

Mon, Jan 28, 2019 at 4:08 AM

YES, I strongly oppose the practice of developer's "behest" payments to our local officials!!!! It is nearly impossible for legit businesses to navigate the total B.S./red tape to operate, yet so many "behest" developers get a free pass regardless of the impact to our community. I support your investigation 10000000%. I'm a 6 generation Californian, and 4th generation Angeleno. I'm in San Pedro, the step-child of Los Angeles, we only exist because L.A. wants to grab the port \$\$\$, right? We have a brand new police station/jail that still languishes, unopened, SIX police officers, and a city filled with fast-food joints, unwanted high-rises, fucking Road Diets, junkies/homeless, etc. My husband & I are retired now, we have worked hard our entire lives. Don't we deserve ANY consideration for our life-long financial support of our community?

Thank you so much for your probe, I wish you all the best with your investigation

Jan



Ban on campaign contributions from many developers and a ban on "behest" payments from developers

1 message

Meg Mc [REDACTED]
To: ethics.policy@lacity.org

Sun, Jan 27, 2019 at 7:38 PM

A ban on campaign contributions from many developers and a ban on "behest" payments from developers should be mandatory in L.A. for full transparency. As a member of the CeSPNC-PLU Committee & as an owner-occupied property-owner in San Pedro, I am horrified by the unethical actions & inaction of our Councilman who has not been to ANY NC meetings in at least 2 years. He had a Homeless Services Expo & had to be surrounded by about 24 LAPD officers, including Chief Moore. Granted, Janice Hahn was also present.

Councilmember Buscaino & the City Council have taken \$ from our Gang Alternative Program (GAP) that we depend on to control gang rivalry tagging. He plans to erect a Little Italy next to our historic Municipal Building City Hall, totally disrespecting the historical Croatian, Scandinavian, Hispanic & other important ethnic groups in San Pedro. The area he wants to include into Little Italy contains the very historical Dalmatian Club, Scandinavian Church & other ethnic landmarks.

Families, businesses & property owners surrounding his proposed homeless shelter in San Pedro had to find out about it on Facebook & in the DailyBreeze newspaper in an article by a resident, the day after July 4, 2018. We still haven't been officially notified & have been on an emotional roller-coaster for the last 6 months.

I have not spoken to one person lately in San Pedro or Wilmington who have had a good thing to say about Buscaino. He seems much more concerned about his videos & photo ops than actually doing his job. Previous supporters who endorsed him now feel betrayed. He is not representing us!

Meg McCarty-Marple, PHN, MSN
NESPWW Block Captain



RE: a proposed ban on campaign contributions from many developers and a ban on "behest" payments from developers.

1 message

Don Dwiggins [REDACTED]
To: ethics.policy@lacity.org
Cc: [REDACTED]

Sun, Jan 27, 2019 at 7:00 PM

Re: a proposed ban on campaign contributions from many developers and especially on "behest" payments from developers.

I support the ban, and urge the Commission to strongly enforce the ban and publicize the details of the violations and the identities of the violators, as soon as the public disclosure restrictions permit. When there's an ongoing pattern of violations, as has been happening lately, I recommend that the Commission publicly describe the pattern (including on the website, and in reports to public media), and to the extent possible, identify the forces at work behind the pattern.

From the Commission's website, I read "When a violation has occurred, the Ethics Commission members may order compliance and assess an administrative monetary penalty. The maximum monetary penalty is the greater of \$5,000 per violation or three times the amount of money at issue." Given the large amounts of money typically at stake here, I would recommend imposing the maximum penalty, especially when the violation is part of a pattern. In such cases, I would also recommend that the Commission promptly enlist the appropriate agencies to prosecute the perpetrators who instigate, maintain, and benefit from the pattern.

I emphasize the recognition and treatment of patterns here in order to understand and address the modus operandi of well-financed forces seeking to exploit the City's resources for large-scale, ongoing private gain.

Thank you for your attention,
Don Dwiggins
Northridge



Corruption across L. A.

1 message

Hilary Steinberg [REDACTED]
To: ethics.policy@lacity.org

Sun, Jan 27, 2019 at 4:21 PM

Hello. I am submitting what I have experienced in my neighborhood, Sherman Oaks, with regards to demolishing of homes and evicting residents. I have reason to believe there have been, and continues to be, a connection between developers, the city planning department and city council members. I have attended many neighborhood council meetings where the room is filled with local residents opposing a specific project proposed by a developer. The residents get up, speak their mind and are given a small window of time before they are shut down. The developer, on the other hand, presents his plan being given an unlimited amount of time and by the end of the meeting, the plan is voted on by neighborhood council members and usually passed, despite all the logical and sensible opposition from constituents. It is clear that the council members have been instructed by city council members to approve the development even before the residents have a chance to be heard. I have seen first hand, similar incidents take place down at City Hall when tremendous opposition is expressed. The Council members often are not even in their seats when community members get up to speak, or they are clearly not even paying attention, as witnessed by me and others seeing them conversing with each other. The vote takes place although some council members are not even present, so therefore their vote is always cast as a yes.

I, myself, have had to suffer great hardship on my own street where three multi family buildings are presently being constructed **at the same time!!!** The dust has affected my breathing, the extra traffic from oversized trucks has been insane, the six day a week noise level is oppressive and the street parking on our block has been affected, due to unnecessary parking restrictions being put in place. Workmen take up all our parking on a street that was once a quiet and peaceful place to live. Trash has been thrown all over the nearby homes and there is a higher rate of crime than ever before. I have called the city offices as well as the councilman's office time after time but either do not get a return phone call or someone tells me they will look into it. Apparently, law abiding, tax paying citizens have no rights when it comes to developers.

A property known as Horace Heidts in Sherman Oaks, presented a proposal several years ago to demolish four houses along Magnolia Blvd to build a large multi family apartment building. The owner happens to own all properties on that one block and also intends to take over a public alley way behind the buildings. Many of us went to the Neighborhood Council meeting to express opposition. Too much traffic on that street, using the alley way would infringe on the privacy of the homeowners behind the alley and this new site would consequently create more evictions not to mention parking being another issue. (Proposed project is directly across the street from a public park) These were just some of the issues raised by opponents. The developers that were present admitted they did **no traffic study**. Several weeks later, Councilman Ryu met with residents surrounding the proposed site. He assured them that said project would not be approved and expressed concern for the neighbors that would be affected. Several months after this meeting took place, information was released around the community that indeed the project would be going forward. This scenario is one of many. We are lied to constantly by the city about ordinances being followed, traffic studies which do not take place and Cqua Laws being violated. We are losing our beloved trees and our neighborhoods are being over run by large boxes called buildings. We are forever being lied to that we have a housing shortage when the issue is an **affordable housing shortage**. We are lied to about the number of people moving to L. A. when those of us that have done research learn that there are more people leaving the city than those entering. We also are aware that most people entering cannot afford to pay rent here or buy a home.

It is my hope that this Ethics Committee will continue to look into the unfair and corrupt practices going on across our city that those of us living here our whole lives have been witnesses to. I truly believe that the current over population of homelessness, crime, pollution and filth is directly related to the over building and unaffordable housing crisis. The evictions that are taking place are becoming a plague. Our present Mayor along with all council members need to be held accountable for upholding the laws related to development. Backroom deals, pay to play and further bribes accepted by city officials to fill their own pockets MUST STOP NOW. We have had enough and we know what it going on. PLEASE HELP US STOP THE CORRUPTION.

Thank you for allowing me the opportunity to voice my experiences and share my observations.

Hilary Steinberg
A concerned citizen of the San Fernando Valley



Developer donations to city council and others responsible for approving their plans

1 message

Florence Waterman [REDACTED]
To: ethics.policy@lacity.org

Sun, Jan 27, 2019 at 3:15 PM

(Los Angeles home owner and real estate investor.)

I believe developers, their employees, family and associates ought to be allowed collectively to contribute to an individual in all no more than a small amount, fixed by government, every year. That is, no exceptional contributions while plans in consideration. No behest contributions at all.

F. S. Waterman

Sent from my iPad



Endemic Corruption at City Hall

1 message

Jeffrey Lynn [REDACTED]

Sun, Jan 27, 2019 at 1:12 PM

Reply-To: Jeffrey Lynn [REDACTED]

To: ethics.policy@lacity.org

Re the above, as a City resident of 40 plus years and former President and current Board member of my local Neighborhood Council, I applaud the efforts being (very) belatedly made to end the pay for play culture at City Hall as it pertains to developers. This should have ended long ago. The only surprise part to me is that it took this long for the FBI to act on it. Having said that, the corruption involving developers is only half of the problem. The other half, which works the same way and is only slightly different in substance, is the corruption involving public employee unions, ie, LAPD, LAFD, DWP and/or any other type of graft that can be explained away as allegedly being in furtherance of "public safety". As we all well know, the building of police and/or fire stations, the awarding of contracts re same, union contracts, pensions, etc. all operate in the same fashion, which is to say that the primary, if not only, consideration is the amount of "campaign contributions" and/or "contract retentions" a given union or contractor can provide a Council member or members, following which the union or contractor is generously rewarded on the taxpayer's dime and with as little public notice or input as humanly possible. Ignore this at your peril, as should you fail to address it this too will blow up in your face shortly, just as developer involved corruption has now.



Proposed Ban on Campaign Contributions from Developers

1 message

stephanie zill [REDACTED]
To: ethics.policy@lacity.org

Sun, Jan 27, 2019 at 12:28 PM

I am 100% in favor of banning ALL campaign contributions from developers to ANY public official. This includes direct and 'behest' payments. As a native Angeleno, and someone who has taken an active interest in politics AND development in LA all my life, I have seen the city I love completely destroyed by untrammled development. I have watched powerless as affordable housing has been demolished, unaffordable \$5,000 per month 'lofts' have been constructed, and sidewalk-to-sidewalk - and straight-up - 'bunker'-type buildings have been erected from one end of Hollywood to the other, wrecking the city and driving out long-time tenants. Overdevelopment and homelessness, paradoxically, go hand-in-hand in Los Angeles as multi-unit apartment buildings are torn down to make way for 'mixed-use' monstrosities that are listing to the side before they are even completed due to shoddy workmanship, sub-standard materials and developer payola. The 'set-aside' for affordable units in these 'luxury rentals' is pathetically inadequate and totally un-enforced.

Sadly, it's too late to save Los Angeles but not too late to change the playing field for the corrupt officials and the developers who fund them.

--
Stephanie Zill



Ban on Campaign Contributions from Developers

1 message

Elliot Hanna [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 11:04 PM

To whom it may concern,

I'm deeply disturbed about the recent allegations of corruption involving some of Mayor Garcetti's and Councilmember Wesson's aides as well as Councilmembers Huizar and Price. The public has a right to expect clean government free from the influence of special-interest money. Unfortunately, the current rules simply don't allow that.

At this time, where the city's seeking to build housing to reduce its ever-expanding homeless population and where it's inclined to approve developments to increase its tax revenue to keep pace with the increasing demand for services, developers are lining up to get a piece of this increasingly lucrative action. Knowing this to be the case, I strongly support the proposed ban on campaign contributions from many – frankly, all – developers as well as a ban on behest payments.

Corruption has no place in this society, especially amongst those entrusted to do the public's business. Although this proposed ban likely won't solve the entire problem, I believe it's a necessary first step. I hope that members of the Ethics Commission believe so as well.

Sincerely,

Elliot Hanna
[REDACTED]
[REDACTED]

You've seen the headlines. The FBI is investigating Los Angeles City Councilmembers Jose Huizar and Curren Price, as well as powerful current or former aides to Mayor Eric Garcetti and City Council President Herb Wesson. The widening probe is focused on possible bribery, kickbacks, extortion and money-laundering.

The Ethics Commission wants to hear your thoughts on a proposed ban on campaign contributions from many developers and a ban on "behest" payments from developers. Behest payments are huge donations made to our elected leaders' "favorite charities."

Let's stop the dirt. The deadline is Jan. 31. Email your comments to ethics.policy@lacity.org



Proposed ban on campaign contributions from developers

1 message

Courtney Small [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Sat, Jan 26, 2019 at 7:48 PM

To The Ethics Commission of the City of Los Angeles:

My name is Courtney Small. I was born and raised in Los Angeles and in fact am the 3rd Generation in my family of Angelenos. I am an Interior Designer and work mainly on residential restoration projects. I am horrified by the reckless tearing down of historic buildings all around me. I am not against progress. I am not against new, beautiful architecture. I am against bad, cheap architecture and buildings that are overly large for no known purpose. I would absolutely support a ban on campaign contributions from developers and a ban on "behest" payments from developers. I have seen first hand how difficult it is to protect historic buildings from being torn down. I have attended city council meetings to lend my voice to other concerned citizens only to be drowned out by the big money the developers bring to the table. Bravo for proposing the ban. I am all for it.

Best,
Courtney Small

[REDACTED]



Joe Buscaino

1 message

Kirk & Tara Lantz [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 9:21 PM

Please investigate Councilman Joe Buscaino as well, even though I am sure you already are.
His own hometown, San Pedro, of all places, is a mess!
Thank you,
Tara Lantz



developers campaign donations

1 message

Sarah Starr [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 5:45 PM

Dear Ethics committee,

Of course developers should be banned from donating to city council members who make decisions about construction. Of course developers should be barred from giving "behest" contributions to council members charities. I'm bewildered as to why this has been allowed and why it is even a question. I think we have seen only the tip of the iceberg in terms of the corruption of our public offices and the use of our taxpayer money to go for tax relief to developers and also permissions to build.

Now we have a housing shortage. We taxpayers have given the city a billion dollars to provide housing for the homeless, and what do you think has happened. As we taxpayers perceive it, our money has now gone into the pockets of developers with little to non relief for the homeless. To wit, the proposed Crossroads at Highland and Sunset advertises the construction of 100 affordable housing units. Meanwhile, to create this they will bulldoze 82 affordable housing units. 18 new units is hardly a fair trade when the construction will make them billions and create gridlock in Hollywood from now to eternity. When do the people get to decide the city they want to live in. I don't bother going downtown to speak at these hearings because they are just window dressing for decisions that have already been made behind closed doors. Will I vote money for these bond issues supposedly offered to create a liveable city--which we all want-- in the future? I think not.

best regards,
Sarah Starr
Los Angeles Taxpayer



developer money

1 message

CHRISTINE KANTNER [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 5:25 PM

Dear Ethics Committee.

Whats going on in our city is really shameful.
Developers are buying their way into city hall thru campaign contributions
I know this is nothing new but we need reform.
Thank you,

Christine Kantner
[REDACTED]



Please establish a strong ban on political donations from developers

1 message

Judy Branfman [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 4:49 PM

Dear Ethics Commission:

Please ban campaign contributions from all for-profit developers in Los Angeles - and ban "behest" payments as well.

We now know that there isn't just an 'appearance' of corruption in LA, but actual preference for developers over legitimate community concerns on the part of many of our elected and appointed officials. This approach has encouraged the loss of tens of thousands of units of rent-stabilized housing and even more units of affordable housing - and made LA an impossible place to live for most people.

I hope you will establish a ban on donations by all or most developers.

Thanks very much,

Judy Branfman

Judy Branfman

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



city council members and property developers

1 message

Karl Bulo [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Sat, Jan 26, 2019 at 1:29 PM

Hi.

Please stop the campaign contributions from developers to elected city officials and their staff.

It's obvious that these contributions are made to influence decisions that are neither favoring the city nor the problems that city is trying to solve at scale for the community's sake.

One obvious example:

The permanant homeless housing structure (Reese-Davidson community) on Venice BI Median two blocks from the beach in Venice, CA.

This parcel is the largest lot in Venice and maybe even on the entire westside. And it is certainly one of the most valuable given the property prices in Venice. Yet, it is being designated for a PSH housing facility—for a cost of around \$600,000 per unit. It will be housing only around 130 people. It will be in violation of multiple building, height, and environmental codes that are in place. The developers are the Venice Community Housing Co and Hollywood Community Housing Co (VCHC and HCHC),

The VCHC has never built a development this large and has never managed a community building on this scale, anywhere.

In this instance, if the city's goal is to house and provide services to as many homeless people as possible, it would logically make the most sense to sell the property on Venice BI Median at market value, and use the immense windfall that will be generated to build housing elsewhere for far more people that 130. At a cost far less than the \$600,000 per unit. Given this, something just doesn't add up with the ethical responsibility to the community and to the tax payers, who are essentially funding this.

Important to note is that the community clearly does not approve of this development. The council member of district 11 is not looking for any community input. He is just forcing this on the adjacent historic landmark, which is the Venice Canals, disregarding input from the Venice Neighborhood Council and awarding contracts to the VCHC, regardless of the constituents.

Moreover, it's very interesting to see that the VCHC has also been awarded several other development contracts in Venice, whose proposals are also in violation of similar codes.

Please take the above into consideration for further investigation of the behavior happening with elected officials, their staff and the VCHC.

Thank you.



please help level the playing field

1 message

Ann Rubin [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 12:05 PM

Dear LA Ethic Comm,

Please help reduce the ability of real estate developers to unfairly influence political decisions about how our communities evolve.

This is more important than ever with density development at break-neck speed and a seeming land-grab near the future Metro stops,

Thank you,

Ann Rubin
[REDACTED]



please help level the playing field

1 message

Ann Rubin [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 12:03 PM

Dear LA Ethic Comm,

Please help reduce the ability of real estate developers to unfairly influence political decisions about how our communities evolve.

This is more important than ever with density development at break-neck speed and a seeming land-grab near the future Metro stops,

Thank you,

Ann Rubin
[REDACTED]



Ethics Policy <ethics.policy@lacity.org>

Corruption

1 message

Miles Green [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 11:46 AM

The FBI needs to investigate this matter to the fullest. Joe Buscaino of CD15 should be investigate d too. Thanks



Corruption

1 message

Valerie Collins [REDACTED]
To: ethics.policy@lacity.org

Sat, Jan 26, 2019 at 10:18 AM

My area has been fighting corruption for years when Barson made our neighborhood accept a Coptic Church or else. It started in 1991 . After the church they were allowed to build 3 story apartment over an historical monument and neighbors private backyards. We gathered 650 signatures against anymore encroachment and absolutely no more apartments but England did not read or care what we were going through he said it would be good for our community. These apartments are supposed to be for Egyptian refugees . They rent them to anyone that will pay.



Ethics Policy

1 message

Dorrit Ragsine [REDACTED]

Sat, Jan 26, 2019 at 7:59 AM

To: ethics.policy@lacity.org

Yes, please ban donations by developers. In our small nook of Los Angeles we have seen developers continue to mindlessly build oversized projects that have little regard for the neighborhood or the tenants that they will reap millions of dollars from providing overpriced boxes.

Developers are the scourge of our time and they need to start thinking and building sustainably, instead of bribing political leaders for the benefit of their own pockets.

Time for some radical change.

Best,

Dorrit Ragsine / Founder
Social Change Public Relations & Marketing
Dorrit@SocialChangePR.com / (213) 509-7748
<http://www.socialchangepr.com>



"It took millions of individual acts to get us to where we are today. It will take millions of individual acts to bring us back."



Support for ban on developer contributions

1 message

Jay Ross [REDACTED] Sat, Jan 26, 2019 at 1:21 AM

To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>, [REDACTED]

To the City,

I support the ban on developer contributions to the Mayor, Councilmembers and City elected officials (city attorney, controller, etc.).

Any member of an LLC or LP development entity, and its managing or general partners, should be included in this ban.

In addition, the spouses should be banned because they are legally tied to donors by virtue of marriage or domestic partnership.

The ban should run from one year before a Planning Dept. or DBS application is submitted to one year after the certificate of occupancy is issued.

Thank you,

Jay Ross





Honest politicians

1 message

carol katona [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 11:51 PM

Please ban campaign contributions and behest payments from developers. We want politicians we can trust will make the best decisions for their constituents, not their pockets.

Thank you
Carol Katona

[REDACTED]



BAN campaign contributions from developers and behest payments

1 message

Jeff McDonough Music [REDACTED]

Fri, Jan 25, 2019 at 10:24 PM

To: ethics.policy@lacity.org

Hi,

I am a 36 year resident of Hollywood. A member of Area 3 of the Hollywood Hills West NC.

I see first hand the results of these corrupt dealings between wealthy developers (many who are not even from the United States), and council members along with other members of government - including the mayor.

I can see with my own eyes that campaign contributions to city officials from developers, and also charity behest payments from developers, are completely unethical. These payments to government officials or their charities are destroying the infrastructure, fabric and quality of life of our great city. Hollywood especially is being run over by these sleazy payments, and is fast losing the architectural and community aspects that actually make Hollywood, Hollywood. Soon, no one will have much of anything that is historic or familiar or interesting to see and enjoy. The traffic here in this area is becoming exponentially worse from the unregulated building. The water and sewer pipes are 100 years old.

Please make this nefarious practice of what is actually bribery, illegal. Before it is too late.

Sincerely,
Jeff McDonough
90068 zip code.



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Developer and behest campaign contributions ban

1 message

Lee Scott [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 7:26 PM

I am writing in support of a strict ban on developer and behest contributions to elected city officials and their campaigns. I would like to see this include companies like Venice Community Housing that appears to have too cozy of a relationship with Councilman Bonin and gets oversized and community changing projects okayed with little oversight against community desires.

Do the right thing for voters!
Lee Scott
Venice, CA



Strict bans on developers giving to politicians.

1 message

clint burdette [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Fri, Jan 25, 2019 at 3:18 PM

All Developer contributions to any politician must be banned. Any Developer that is found making illegal contributions, or providing any monies that would result in a conflict of interest to any city official must also face severe criminal and civil penalties. At a minimum ten years mandated prison time. At a minimum a fine of one million dollars to go to the neighborhood council.

While I favor sensible sustainable development. I find unfair corrupt practices reprehensible. The impact of poor shoddy development of the kind we have been seeing from these corrupt Los Angeles politicians permanently damages the lives of our citizens and the economic life blood of our communities.

Good development should give families a chance at economic growth, in the same way that the housing stock of Los Angeles has secured the lives of millions of home owners. We need development that provides equal economic opportunity to families and small businesses. We need development that supports climate and sustainability needs. We do not need the kind of development we are seeing in Los Angeles in which greedy developers build massive structures which could pass for prisons and strip mine the economy with over-priced rents that will always be a burden to their tenants.

Stop the corruption at its' core.

Sincerely Clinton Burdette



Developer contributions

1 message

Shelley Wagers [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 2:25 PM

In recent years, Los Angeles has suffered a steady stream of scandals that reflect corruption both “soft” and hard.

- This corruption produces skewed, unsound public policy.
- It does deep and lasting damage to public confidence.
- It tempts rank-and-file staff to put personal interests ahead of public responsibilities.
- It weakens the ethical foundation of good governance.

Angelenos deserve public policy that serves the public interest and restores public trust. The Ethics Commission can provide a roadmap by endorsing no-nonsense, fundamental reforms that target core problems:

- Ban campaign contributions and “behested” donations to any elected official from any entity with business before that official.
- Ban sources of campaign contributions and “behested” donations from bringing any business before that official for a subsequent period of two years.
- Ban *ex parte* meetings between parties seeking support for projects and any elected officials, board members, commission members, or agency personnel who may have a voice in the decision.

This is no time to tinker around the margins. The City of Los Angeles needs to clean house, and your commission has a once-in-a-generation opportunity to show the way. Please use it well.



Hi from pb....friday 1/25/2019

1 message

Fri, Jan 25, 2019 at 2:21 PM

To: ethics.policy@lacity.org

Cc: [Redacted]

definatly STOP campaign contributions from developers...charity donation or "other wise" to COUNCILMAN members & MAYOR, ALL of them.... and REDUCE their salary & NO MORE PENSION ! Garcetti was my council man (district 13 Atwater) 20 years ago, 2 terms... no one ran against him...we had no choice then he became "mayor"... I have observed \$\$\$ WASTE ever since in my neighborhood & city of LA. (he spent a million \$ for a "maquette" design for fixing the Hyperion bridge/retrofit, bike path +, NEVER been fixed never got anything, also sound barrier wall from the freeway was promised nothing!) .. now .recently in Atwater village * (councilman O'Farrell, Garcetti's minion X field officer) approved a single family home to be demolished & 6 four story "houses" in it's place...that's 6 new property taxes on the single family lot. The units are about 5 inches apart. zoning was changed, it's the tallest building on the block & each sold for just short of a million each.... there are other zoning/building issues going on... We NEED STRICT BANS on developing...every time "they" build it's right up to the sidewalk maxing out any grow space for a parkway shade tree, not enough canopy room between building & parkway.....I hate what has happened to this city, tearing down historic landmarks, neighborhoods, single story homes to pack in more "UNAFFORDABLE" housing...pb

Man Who Predicted 2008 Meltdown Surprise New Predictions

thelegacyreport.com

http://thirdpartyoffers.juno.com/TGL3132/5c4b8c31bdecac316eaest02duc

Sponsored Links (i)



Campaign-Finance Reform

1 message

Pati Moser [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 1:50 PM

The citizens of Los Angeles deserve better. Our neighborhoods, our communities, are being destroyed by big development. It must be stopped now.

At the center of this big development are our very own elected politicians. They allow height restriction changes. They allow zoning changes. They allow single family residential neighborhoods to be destroyed by these changes.

Stop the politicians from taking any money from developers.

Thank you for listening.

Pati Moser
[REDACTED]



Campaign-Finance Reform

1 message

Babette [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 1:42 PM

There isn't even an attempt to make secret the fact that the City of Los Angeles is run by developers. Finally dealing with the consequential corruption in our City Council, and in the office of our mostly absentee Mayor, will hopefully be the beginning of the end of such blatant misfeasance. Banning campaign contributions and behest payments by developers is an obvious and long-overdue action.

Babette Wilk
Valley Village 91602



Developer Ban on Campaign Contributions

1 message

Fri, Jan 25, 2019 at 12:58 PM

[REDACTED]
[REDACTED]
To: ethics.policy@lacity.org

Dear Ethics Commission Members,

With regards to the agenda item on your Feb 19 meeting, I would urge you to adopt measures analogous those those enacted by Temple City CA.

I need only reface the current FBI probes as a starting point for why.

Our public servants need to be just that: Public Servants.

Thank you,

Mary Hruska (Mar Vista Community Council)



Ban on developers contribution

1 message

Yuval Bar-Zemer [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Fri, Jan 25, 2019 at 11:48 AM

To whom it may concern

I am in favor of a strict ban for any developer or his employees to donate money to political campaigns and serving elected official. The ban should extend to donation to other organizations that the elected official wants to support.

Yuval Bar-Zemer

P.S.

I am a developer



Campaign contributions

1 message

JAMES MYKYTENKO [REDACTED]

Fri, Jan 25, 2019 at 11:22 AM

To: ethics.policy@lacity.org

I completely support campaign finance reform and a full FBI investigation of improper campaign finances. Sadly, it seems that the appropriate charges and penalties never materialize and that is why the corruption persists.

Sent from my iPhone



Clean up your pay-for-play system

1 message

Fri, Jan 25, 2019 at 11:19 AM

To: ethics.policy@lacity.org

Cc: [REDACTED]

Dear Board.

I come from Venice, one of L.A.'s many distinctive small communities that is being ravaged by rampant development along with homeless housing plans that are disproportional in their effect on the 3 square miles of our area. The massive scale of these homeless residential plans takes away potential park and service lands from our residents while coincidentally also providing great development opportunities for the friends of Bonin--most from districts who are not being slated for homeless projects. I hope he is among those council members being examined for corruption.

Please use your power to fully investigate and REGULATE these self-serving politicians who have clearly indicated their allegiance to wealthy donors over the needs and interests of the people of Los Angeles. Restrict donations from powerful development interests that weaken our communities, worsen problems with infrastructure, and perpetuate a system where money talks and people can only squawk!

Respectfully,
Suellen Mayfield

PS. While you're at it, why don't you take a look at any funding funny stuff re. our ambitious mayor.



Developers

1 message

S. Brandt [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 11:11 AM

I am sick of our city falling prey to disgusting developers. The entire landscape of Los Angeles is ruined and there is no more affordable housing. The city planners and the mayor are guilty of many things and have ruined our city. Stop the back room meetings and kickbacks. This city is becoming impossible to live in with the corruption. Citizens first! Get it together! Stop all the unnecessary building!

An angry resident ,
Savanah Brandt
Los Angeles, Ca

Sent from my iPhone



No special interest/developer contributions to L.A. City political races

1 message

Fri, Jan 25, 2019 at 11:05 AM

[REDACTED]
To: ethics.policy@lacity.org

Whether it's a developer, "charity", bicycle enthusiast, or any special interest, the elected politicians are supposed to represent ALL voters. No one should have more than one vote. The City of Los Angeles has a long history of corruption so ingrained that we've stopped recognizing it as inappropriate or fixable.

No developer or any potential contributor with a conflict of interest should be allowed to contribute any more than any one individual. Ban all contributions save those of private individuals to L.A. City political office holders or those running for higher office!

Kenneth S. Alpern, M.D.
[REDACTED]



Ban developer contributions

1 message

Fri, Jan 25, 2019 at 11:01 AM

To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>
Cc: [REDACTED]

ethics.policy@lacity.org

All Developer contributions to any politician must be banned. Any Developer that is found making illegal contributions, or providing any monies that would result in a conflict of interest to any city official must also face severe criminal and civil penalties. At a minimum ten years mandated prison time. At a minimum a fine of one million dollars to go to the neighborhood council.

While I favor sensible sustainable development. I find unfair corrupt practices reprehensible. The impact of poor shoddy development of the kind we have been seeing from these corrupt Los Angeles politicians permanently damages the lives of our citizens and the economic life blood of our communities.

Good development should give families a chance at economic growth, in the same way that the housing stock of Los Angeles has secured the lives of millions of home owners. We need development that provides equal economic opportunity to families and small businesses. We need development that supports climate and sustainability needs. We do not need the kind of development we are seeing in Los Angeles in which greedy developers build massive structures which could pass for prisons and strip mine the economy with over-priced rents that will always be a burden to their tenants.

Stop the corruption at its' core.

Sincerely

John DeGolyer
[REDACTED]



corruption at City Hall

1 message

mary louise monahan [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 11:04 AM

Dear Sir/Madam:

I am a resident & landlord in Los Angeles. I am tired of our elected leaders allowing/encouraging developers to bribe them with election & charity money to influence their decision & votes. I have direct evidence & experience with Building & Safety officials allowing builders to not follow the building codes in commercial & residential projects. Our neighborhood is being inundated with McMansions & 5-story condos.

Please STOP this loophole for developers & our elected officials to get their way.

Sincerely, Mary Louise Monahan, [REDACTED] [REDACTED]



Corruption Probe of L.A. Developers

1 message

Brian Coleman [REDACTED]
To: "ethics.policy@lacity.org" <ethics.policy@lacity.org>

Fri, Jan 25, 2019 at 11:02 AM

Gentle-persons,

I am a 68 year old lifelong resident of Los Angeles. I was born in the San Fernando Valley and have life in various areas within the city all my life. I currently reside in San Pedro.

I want to make it absolutely clear how important it is that you take aggressive action to defend our city and its residents from the corruption that has taken over the City Counsel through the actions of developers who have no regard for the tax payers or the quality of life in our city. None of these people have to deal with the repercussions of over development. Every day, as I pass through downtown L.A. on my way to or from work, I deal with achingly bad traffic while watching building after building going up in the city. This kind of development can only happen if our city government has given up on protecting its citizens in favor of assisting developers with wholesale abuse of what should be an honest and transparent process.

So I am imploring you. Please, please, please impose a strict ban on developers making campaign contributions to any city official and also on the "behest" payments, which are just an illusion of legality.

Sincerely,

Brian Coleman



Developer Proposed Ban on Campaign Contributions COMMENT

1 message

Fri, Jan 25, 2019 at 11:00 AM

To: ethics.policy@lacity.org

Cc: [REDACTED]

Hello – we are a group that works to protect the Walnut Acres area of Woodland Hills. There are so many instances of payments from developers and their representatives – Brad Rosenheim is an example of an ex-City Planner who contracts with developers to get their projects in our area approved – who have made payments to our City Councilman’s office. Please look into two significant neighborhood developments – the Fallbrook Eldercare ([6221 Fallbrook Woodland Hills](#)) (issued permits after a 7 year neighborhood fight that went through the courts) and Boething Treeland (environmental report stage), which are two developments this neighborhood has taken issue with. The developers and Mr. Rosenheim and his wife, the Boething family and their developers, have all contributed to Councilman Blumenfield and we can only believe it is for favor, as Councilman Blumenfield’s office backs the developer’s interests every time.

We are a neighborhood of approximately 3,000 residences, zoned RA-1 very low density, and are under siege by developers. The unfair playing field is ruining our neighborhood and as hard as we fight, we cannot win over money and back room deals. Really glad the Ethics Commission is looking into all of this. Its high time.

Thank you

Preserve Walnut Acres



Ban on Developers Bribes

1 message

Leda Shapiro [REDACTED]
To: ethics.policy@lacity.org

Fri, Jan 25, 2019 at 10:39 AM

I think a ban on money from developers is long overdue! Currently they are making profits by eliminating affordable housing and putting additional stress on our infrastructure. And our city government has given variances to whatever developers want regardless of what would really benefit our city.
In addition I think there need to be restrictions on Chinese investment in these luxury buildings that are empty or AirBnB instead of affordable housing
We do NOT need more luxury housing. We need affordable housing and should be a minimum of 20% of any new development
Leda Shapiro
Sherman Oaks

Sent from my iPhone