

## ETHICS COMMISSION IMPOSES FINE OF \$15,000

The Ethics Commission unanimously approved a stipulated order at its April 19 meeting, imposing a fine of \$15,000 against NASH-Holland 3rd and Fairfax Investors, LLC (NASH-Holland) for failing to file major filer disclosure reports.

NASH-Holland is a joint venture between Holland Partner Group and an equity partner in a development project located at West 3rd Street and Fairfax Avenue. From 2020 to 2022, NASH-Holland contracted with Tony Torres Consulting (TTC) to conduct public outreach for the project. During this period, NASH-Holland qualified as a major filer but failed to file six quarterly disclosure reports after making qualifying payments to TTC. NASH-Holland admitted to violating City law and has filed the required disclosure reports.

To ensure transparency and preserve the integrity of City government, City law requires major filers to file quarterly disclosure reports with the Ethics Commission. Los Angeles Municipal Code (LAMC) § 48.08(E). A major filer is a person who makes payments or incurs expenditures totaling \$5,000 or more during a calendar quarter for public or media relations, public outreach, research, studies, or similar activities for the purpose of attempting to influence action on a proposed or pending City matter, as long as the payments or expenditures are not required to be reported by a lobbyist or lobbying firm. LAMC § 48.02.

“Disclosure is an essential tool for ensuring public accountability,” said Jeffery Daar, the President of the Ethics Commission, “and it is important for lobbyists and major filers to comply with the disclosure requirements. This case is a reminder that the Ethics Commission takes transparency seriously.”

All penalties levied by the Ethics Commission are paid to the City’s general fund. Enforcement orders can be viewed and searched through the Ethics Commission’s [Public Data Portal](#).

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*The [Ethics Commission](#) was created by Los Angeles voters in 1990 to impartially administer and enforce the City’s governmental ethics, campaign financing, and lobbying laws.*