

October 16, 2013

Via email (holly.wolcott@lacity.org)

Ms. Holly Wolcott, Interim City Clerk
200 N. Spring Street
City Hall – Third Floor
Los Angeles, CA 90012

Subject: Los Angeles City Governmental Ethics Ordinance

On October 18, 2013, the Rules, Elections, and Intergovernmental Relations Committee of the City Council will be discussing proposed changes to the City's Governmental Ethics Ordinance ("GEO"). It is Council File No. 13-1082, and appears as Item No. 11 on the Committee's agenda. You should know that I am a registered lobbyist, and the company I work for, Psomas, is a registered lobbying firm.

Regardless of how one interprets ethical behavior, I believe we can all agree that the City's GEO is so complex that even well-intentioned people can easily make innocent mistakes. My specific concern deals with "gifts." In fact, just reading the staff report being presented to your Committee is confusing. I have come to learn that when Psomas hosts an informal function at our office, we can offer City officials water or coffee (I have been told that these beverages are "customary"), but we cannot offer popcorn (because such a snack is not "customary"). I have also been told that technically, while at the Psomas office, a City official cannot plug his laptop computer into our electric outlet because the official would be receiving a "gift." Really? Is this the extreme approach we want to take to the issue of ethics?

Rather than trying to interpret existing law or what is being proposed by the Ethics Commission to the City Council, I would like to recommend the following:

- Allow Restricted Sources to provide and for City officials to accept "gifts" of \$50 per year: AND
- Allow Restricted Sources to provide and for City officials to accept a meal that is served at an event, as long as other non-City personnel are in attendance. (This will allow the City official to attend an event without having to worry about having to pay for a sandwich that others are offered at no cost by the host.); AND

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October 16, 2013

Page 2

- Allow Restricted Sources to give and for City officials to accept holiday "gifts" (e.g., Christmas candy) with a limit of \$25.

I am sure that some people will argue that there should be absolutely no "gifts" to City officials. I would argue that my suggestions are nothing more than common courtesy. I don't believe, and I am confident that you don't believe that any City official is being compromised when a \$15 meal is being purchased. We need to bring back some sanity into the discussion of ethics. I believe that my suggestions are reasonable approaches. If you agree, then I would suggest you direct Staff to implement these changes.

Sincerely,

PSOMAS



Joel B. Miller

Vice President/Principal

Cc: Hon. Herb J. Wesson, Jr.
Hon. Tom LaBonge
Hon. Jose Huizar