



Los Angeles City Ethics Commission
December 10, 2013

The Honorable City Council
c/o Holly Wolcott, Interim City Clerk
200 North Spring Street
City Hall – 3rd Floor
Los Angeles CA 90012

**Re: Council File Number 13-1538
Appointment of Jan Perry as the General Manager of the
Economic and Workforce Development Department**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On November 15, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Ms. Jan Perry as the General Manager of the Economic and Workforce Development Department. The Ethics Commission received Ms. Perry's pre-confirmation statement of economic interests (SEI) today, and this letter is provided for your consideration as part of the confirmation process. A copy of this letter is also being provided to Ms. Perry to help her avoid potential conflicts of interests that may arise in the course of her tenure as the General Manager of the Economic and Workforce Development Department.

Ms. Perry reports on her SEI a personal loan she received from Chris Cortazzo. If a matter involving this interest comes before her, Ms. Perry should, before acting, seek the advice of the City Attorney regarding whether she should disqualify herself. We are unable to assess if or how frequently Ms. Perry would be in a position of having to recuse herself.

Interests disclosed on an SEI are not the only interests that can give rise to a conflict of interests. For example, state law may require recusal by a board or commission member due to certain business activities of the clients of that member's employer. Additionally, recusal may be required under City Charter § 222, which states that the City Attorney may provide a written opinion concerning the obligation of a City official to refrain from acting on a matter when it may violate state law or when action may not be in the public interest. If a matter raises a potential conflict of interests, we encourage Ms. Perry to seek the advice of the City Attorney before acting.

If you have questions, please feel free to contact me at (213) 978-1960.

Sincerely,

Alexandria Latragna
Ethics Program Analyst

cc: Mayor Eric Garcetti
Ms. Jan Perry