



Los Angeles City Ethics Commission

December 4, 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: Amended Conflict of Interests Code
Los Angeles Convention Center**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

Enclosed are proposed amendments to the conflict of interests (COI) code for the Los Angeles Convention Center. As the City's code-reviewing body, the City Council must approve, revise, or return the proposed amendments within 90 days of the date they are received. Cal. Gov't Code §§ 82011(c), 87303. We recommend that you approve the proposed amendments.

State law requires City agencies to adopt COI codes and to amend them whenever changed circumstances make amendments necessary. Cal. Gov't Code § 87306. The Los Angeles Convention Center's staffing structure will change on December 8, 2013, and its COI code has been updated to accurately reflect the new structure. Designated positions (Attachment D) have been deleted from the code, and appropriate disclosure categories (Attachment E) have been assigned. The revisions are further described in Attachments F through H.

We have been informed by the City Attorney's office and by the Executive Director of the Los Angeles Convention Center that the designated positions in Schedule A identify all of the individuals in the agency who are required by state law to file statements of economic interests and that the assigned disclosure categories accurately reflect the scope of each position's decision-making authority. In addition, the agency has indicated that all of the state's procedural requirements for amending a COI code have been met (Attachment A).

In addition to designated positions and disclosure categories, state law also requires the City's COI codes to include a main code body, which provides background information about the COI code requirements and is the same for every City agency. Once the amended code for the Los Angeles Convention Center is approved, the City Clerk's office will certify the date of approval on the second page of the main code body (Attachment C) and return the original to the Ethics Commission so that we have a complete code on file.

We urge you to approve this revised COI code. If you have any questions, please contact Ethics Program Manager Shannon Prior at (213) 978-1960.

Sincerely,



Heather Holt
Executive Director

Attachments:

- A Agency letter dated December 4, 2013*
- B Public comment*
- C Main Code Body*
- D Designated Positions (Schedule A)*
- E Disclosure Categories (Schedule B)*
- F Deleted Positions Sheet*
- G Changed Position Title Sheet*
- H Revised Disclosure Category Sheet*