



Los Angeles City Ethics Commission

January 14, 2014

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 13-1698
Appointment of Lisa Waltz Morocco to the
West Los Angeles Area Planning Commission**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On December 17, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Ms. Lisa Waltz Morocco to the West Los Angeles Area Planning Commission. The Ethics Commission received Ms. Waltz Morocco's pre-confirmation statement of economic interests (SEI) on January 10, 2014, 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. Waltz Morocco to help her avoid potential conflicts of interests that may arise in the course of her tenure as a member of the West Los Angeles Area Planning Commission.

Ms. Waltz Morocco reports on her SEI a sole proprietorship interest in and income from Two Dog Alert. If a matter involving this interest comes before the West Los Angeles Area Planning Commission, Ms. Waltz Morocco 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. Waltz Morocco 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.

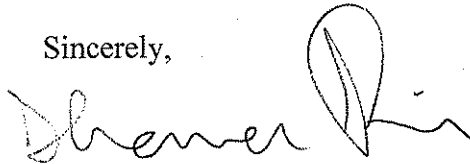
If a matter raises a potential conflict of interests, we encourage Ms. Waltz Morocco to seek the advice of the City Attorney before acting. If Ms. Waltz Morocco is required to disqualify herself from acting on a matter, Los Angeles Municipal Code § 49.5.6(J) and Executive Directive 2005-1 require her to file a Recusal Notification Form (CEC Form 51) with the Ethics Commission and the Mayor's office. If a board or commission member is disqualified from acting on three or more agenda items in a year because of a conflict caused by the same interest, the Ethics Commission is required by City Charter § 707 to review the conflict. If the

Ethics Commission determines that the member has a significant and continuing conflict of interests, it must order divestment of the interest that is causing the conflict.

In addition to filing SEIs, nominees also file Residence Verification Forms. We have received a completed form from Ms. Waltz Morocco, which states that she is registered to vote in the City.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Prior". The signature is fluid and cursive, with a large, stylized initial "S" and "P".

Shannon Prior
Ethics Program Manager

cc: Mayor Eric Garcetti
Ms. Lisa Waltz Morocco