



Los Angeles City Ethics Commission

March 10, 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 14-0155  
Appointment of Oshin Harootonian to the  
North Valley Area Planning Commission**

***FOR COUNCIL CONSIDERATION***

Dear Councilmembers:

On February 3, 2014, the Mayor transmitted to the City Clerk a letter indicating his appointment of Mr. Oshin Harootonian to the North Valley Area Planning Commission. The Ethics Commission received Mr. Harootonian's pre-confirmation statement of economic interests (SEI) on March 4, 2014, and City Council confirmed his appointment on the same day. This letter is provided for inclusion in the City Council file. A copy of this letter is also being provided to Mr. Harootonian to help him avoid potential conflicts of interests that may arise in the course of his tenure as a member of the North Valley Area Planning Commission.

Mr. Harootonian reports on his SEI an ownership interest in and income from Primex Clinical Laboratories, Inc., where he serves as chief executive officer. If a matter involving this interest comes before the North Valley Area Planning Commission, Mr. Harootonian should, before acting, seek the advice of the City Attorney regarding whether he should disqualify himself. We are unable to assess if or how frequently Mr. Harootonian would be in a position of having to recuse himself.

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.

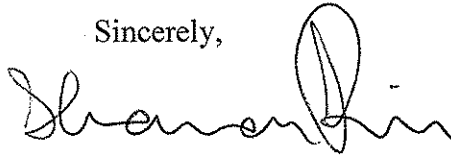
If a matter raises a potential conflict of interests, we encourage Mr. Harootonian to seek the advice of the City Attorney before acting. If Mr. Harootonian is required to disqualify himself from acting on a matter, Los Angeles Municipal Code § 49.5.6(D) and Executive Directive 2005-1 require him to 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 Mr. Harootonian, which states that he 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 cursive script, appearing to read "Shannon Prior". The signature is written in black ink and is positioned above the printed name and title.

Shannon Prior  
Ethics Program Manager

cc: Mayor Eric Garcetti  
Mr. Oshin Harootonian