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March 19, 2019

Los Angeles City Council President Herb Wesson
Chair, Rules, Elections and Intergovernmental
Relations Committee
200 N. Spring Street, Room 430
Los Angeles, CA 90012

Re: SUPPORT for Developer Contribution Limits (CF 19-0046)

Dear Council President Wesson and Honorable Committee Members:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 43 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. At its meeting of February 6, 2019, the Federation voted to support the Council's motion regarding developer contribution restrictions, which we note was moved by six councilmembers (Bonin, Buscaino, Koretz, Krekorian, Martinez, and Ryu) and seconded by President Wesson.

In its recommendation to the Rules Committee, the City Ethics Commission cites a Ninth Circuit Court of Appeal case holding cities have a strong interest in "[p]reventing corruption, the appearance of corruption, or circumvention of the law." *Thalheimer v. City of San Diego* (9th Cir. 2011) 645 F.3d 1109. This is especially true in Los Angeles where, as detailed in the Commission's letter, "[a]ctual corruption and widespread ethics violations are [] associated with developers." Councilmember Ryu's January 16 letter quotes a Second Circuit case finding "the public perception of quid pro quo corruption . . . alone justifies limitations or an outright ban." *Ognibene v. Parkes* (2nd Cir. 2011) 671 F.3d 174, 187.

The Hillside Federation agrees that the above concerns justify pro-active local legislation to limit developer contributions, and strongly supports the motion.

Sincerely,

Charley Mims
Charley Mims
President, Federation of Hillside and Canyon Associations, Inc.

Argyle Civic Association
Beachwood Canyon Neighborhood
Bel-Air Association.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
CASM-SFV
Crests Neighborhood Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Residents of Beverly Glen
Save Coldwater Canyon!
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

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