



Los Angeles City Ethics Commission

December 19, 2018

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

**Re: Technical Amendments to Campaign Filing Deadlines
FOR COUNCIL CONSIDERATION**

Dear Councilmembers:

On December 18, 2018, the Ethics Commission unanimously approved technical amendments to filing deadlines in the Campaign Finance Ordinance (CFO). These amendments are necessary in light of the new even-year election schedule, and the Ethics Commission urges you to adopt them.

A. Approved Amendments

The Ethics Commission approved the language below to revise the campaign filing deadlines for City candidates, committees, and officeholders. The revisions are necessary to fully implement the change from odd-year elections to even-year elections, with general elections held in November.

The revisions modify Los Angeles Municipal Code (LAMC) sections 49.7.14 and 49.7.21. They eliminate redundancies, take into consideration the existing filing requirements in state law, and maintain the filing frequency that has been in place since the CFO was first adopted.

Importantly, these amendments to the CFO will also ensure that campaign statements will continue to be filed on the same schedule in both City and LAUSD elections. The rules that apply to LAUSD elections are housed in the Los Angeles City Charter (City), and the section regarding LAUSD filing deadlines has already been amended as part of Charter Amendment EE. *See* Charter § 803(r)(1).

**LAMC § 49.7.14
CAMPAIGN STATEMENT FILING DEADLINES.**

Every candidate for elected City office, every candidate's City controlled committee, and every City recall committee, City ballot measure committee, City general purpose committee, committee primarily formed to support or oppose City candidates or City ballot measures, and every person who makes

independent expenditure communications in City elections and qualifies as a committee under the Political Reform Act shall file the campaign statements required by the Political Reform Act and shall also file campaign statements by the following dates prior to an election in which the candidate or measure appears on the ballot:

- A. The Friday before an election, covering activity ~~from the close of the reporting period for the previous campaign statement~~ through the Wednesday before the election, ~~if the candidate or committee is required by the Political Reform Act to file a pre-election campaign statement.~~
- B. October 10, covering activity from July 1 through September 30 in ~~the years~~ prior to a City primary election that is held in March ~~of an odd-numbered year.~~
- C. January 10, covering activity from October 1 through December 31 in ~~the years~~ prior to a City primary election that is held in March ~~of an odd-numbered year.~~

LAMC § 49.7.21

DISCLOSURE BY OFFICEHOLDER AND LEGAL DEFENSE COMMITTEES.

In addition to the campaign statements required by the Political Reform Act and Section 49.7.14, an elected City officer or a candidate for elected City office who controls an officeholder or legal defense committee shall file campaign statements for that committee as follows:

- A. Except as specified in Subsection B, quarterly statements shall be filed no later than the following dates:
 1. April 30 for the quarter ending March 31;
 2. July 31 for the quarter ending June 30;
 3. October 31 for the quarter ending September 30; and
 4. January 31 for the quarter ending December 31.
- B. When the officeholder or candidate has filed a Declaration of Intent to Solicit and Receive Contributions for a City election, quarterly statements shall be filed no later than the following dates:
 1. During the year prior to the election:
 - a. April 30 for the quarter ending March 31;
 - b. July 31 for the quarter ending June 30;
 - c. October 10 for the quarter ending September 30; and
 - d. January 10 for the quarter ending December 31.
 2. During the year of the election:
 - a. ~~July 31 for the quarter ending June 30, including any The Friday before the election, covering activity not covered by~~ from the close of

the reporting period for the previous campaign statement through the Wednesday before the election;

- b. October 31-April 30, covering activity for the quarter ending September 30-March 31 but excluding any activity disclosed in a previous campaign statement; and
- c. January 31 of the following year, covering activity for the quarter ending December 31 but excluding any activity disclosed in a previous campaign statement.

B. Conclusion

To fully implement the new even-year election schedule, the Ethics Commission urges you to adopt the technical changes to the CFO's disclosure filing deadlines that are identified above in Section A. The new filing deadlines would first apply to the regular 2020 elections.

We would be happy to discuss these recommendations with you at any time. If you have questions, please do not hesitate to contact me or Tyler Joseph, our Policy Director.

Sincerely,



Heather Holt
Executive Director