



**Los Angeles City Ethics Commission**

March 21, 2013

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

**Re: Council File Number 13-0301  
Appointment of Paul Hudson to the  
Housing Authority of the City of Los Angeles**

***FOR COUNCIL CONSIDERATION***

Dear Councilmembers:

On March 14, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Mr. Paul Hudson to the Housing Authority of the City of Los Angeles (HACLA). The Ethics Commission received Mr. Hudson's pre-confirmation statement of economic interests (SEI) on March 18, 2013, and this letter is provided for your consideration as part of the confirmation process. A copy of this letter is also being provided to Mr. Hudson to help him avoid potential conflicts of interests that may arise in the course of his tenure as a member of HACLA.

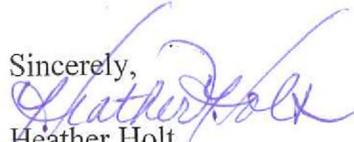
Mr. Hudson reports on his SEI income from Broadway Federal Bank for his position as chairman. He also reports his ownership interest in Hudson & Holland Advisors, LLC, where he is a managing director. In addition, Mr. Hudson reports an investment interest in Broadway Financial Corporation. If a matter involving any of these interests comes before HACLA, Mr. Hudson should, before acting, seek the advice of the attorney who advises HACLA regarding whether he should disqualify himself. We are unable to assess if or how frequently Mr. Hudson 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. If a matter raises potential conflict of interests issues, we encourage Mr. Hudson to seek the advice of the attorney who advises HACLA before acting.

In addition to reviewing a nominee's SEI, the Ethics Commission also verifies that the nominee is a registered City voter. We have received a completed Residence Verification Form for Mr. Hudson, which affirms that he is registered to vote in the City.

If you have questions, please feel free to contact Ethics Program Manager Shannon Prior at (213) 978-1960.

Sincerely,



Heather Holt  
Executive Director

cc: Mayor Antonio Villaraigosa  
Mr. Paul Hudson