



Los Angeles City Ethics Commission

August 23, 2013

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 13-1058
Appointment of Jimmie Woods-Gray to the
Fire Commission**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On August 14, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Ms. Jimmie Woods-Gray to the Fire Commission. The Ethics Commission received Ms. Woods-Gray's pre-confirmation statement of economic interests (SEI) on August 21, 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 Ms. Woods-Gray to help her avoid potential conflicts of interests that may arise in the course of her tenure as a member of the Fire Commission.

Ms. Woods-Gray reports on her SEI an interest in real property which is held by the Jimmie Woods-Gray Trust. If a matter involving this interest comes before the Fire Commission, Ms. Woods-Gray 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. Woods-Gray 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.

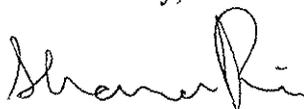
If a matter raises a potential conflict of interests, we encourage Ms. Woods-Gray to seek the advice of the City Attorney before acting. If Ms. Woods-Gray is required to disqualify herself from acting on a matter, Los Angeles Municipal Code § 49.5.6(J) and Executive Directive 2005-1 require her to file 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 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 Ms. Woods-Gray, which affirms 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 initial "S" and "P".

Shannon Prior
Ethics Program Manager

cc: Mayor Eric Garcetti
Ms. Jimmie Woods-Gray