

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at [NCsupport@lacity.org](mailto:NCsupport@lacity.org).

This is an automated response, please do not reply to this email.

#### Contact Information

Neighborhood Council: Bel Air-Beverly Crest Neighborhood Council

Name: Travis Longcore, Ph.D.

Phone Number: 310-247-9719

Email: [tlongcore@babnc.org](mailto:tlongcore@babnc.org)

The Board approved this CIS by a vote of: Yea(13) Nay(0) Abstain(2) Ineligible(0) Recusal(0)

Date of NC Board Action: 11/30/2022

Type of NC Board Action: For

#### Impact Information

Date: 12/03/2022

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 22-0560

Agenda Date:

Item Number:

Summary: The Bel-Air Beverly Crest Neighborhood Council supports the updates to the Municipal Lobbying Ordinance (MLO) recommended by the Ethics Commission. We urge Committee Chair Paul Krekorian to schedule this council file for consideration and for a vote in either the Ad Hoc Committee on City Governance Reform or the Rules, Elections, and Intergovernmental Relations Committee. The MLO has not been comprehensively updated since it was adopted in 1994, and two previous revisions from the Ethics Commission died in committee. The updated MLO would close a number of loopholes in the original Ordinance and make the Ordinance itself more user-friendly: clearer; better organized; more self-consistent; more consistent with the Campaign Finance Ordinance and the Governmental Ethics Ordinance; and more reflective of the technological environment in which the City currently conducts its business.



**Community Impact Statement**

**Council File 22-0560  
Municipal Lobbying Ordinance / Updates**

**Position: FOR**

The Bel-Air Beverly Crest Neighborhood Council supports the updates to the Municipal Lobbying Ordinance (MLO) recommended by the Ethics Commission. We urge Committee Chair Paul Krekorian to schedule this council file for consideration and for a vote in either the Ad Hoc Committee on City Governance Reform or the Rules, Elections, and Intergovernmental Relations Committee. The MLO has not been comprehensively updated since it was adopted in 1994, and two previous revisions from the Ethics Commission died in committee. The updated MLO would close a number of loopholes in the original Ordinance and make the Ordinance itself more user-friendly: clearer; better organized; more self-consistent; more consistent with the Campaign Finance Ordinance and the Governmental Ethics Ordinance; and more reflective of the technological environment in which the City currently conducts its business.

In addition, the Bel-Air Beverly Crest Neighborhood Council requests that a lobbying disclosure for City Council and Committee meetings be added to the Updated MLO. This disclosure would parallel and complement the disclosure in Updated MLO for Neighborhood Councils (48.11,B) and would require that lobbyists verbally identify themselves as such at City meetings (or be identified by the presiding officer). Such disclosure would ensure that the public is fully aware when a speaker is a paid lobbyist. Neighborhood council members, and members of the general public, frequently listen to City Council meetings or recordings of them: this addition to the Updated MRO would bring greater transparency to the City processes.

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**STAKEHOLDER GROUPS**

Bel Air Association  
Bel-Air Crest Master Association  
Bel Air Hills Association  
Bel Air Ridge Association  
Benedict Canyon Association  
Casiano Estates Association  
Doheny-Sunset Plaza Neighborhood Assn.  
Holmby Hills Homeowners Association  
Laurel Canyon Association  
Residents of Beverly Glen

**RESIDENTIAL DISTRICTS**

Bel Air District  
Bel Air Glen District  
Franklin-Coldwater District  
North of Sunset District  
**NON-RESIDENTIAL REPRESENTATION**  
At-Large Members  
Commercial or Office Enterprise Districts  
Custodians of Open Space  
Faith-Based Institutions  
Public Schools & Private Schools

The BABCNC also requests that the second of the exemptions for 501(c)(3) non-profits in the updated MLO (48.03, E 2) be changed from “The organization had gross receipts of less than \$2 million in the previous tax year” to “The organization had gross receipts of less than \$200,000 in the previous tax year.” Only 16% of Southern California non-profits have annual gross receipts of \$1 million or more, so an exemption set at twice that amount might have a grave effect on transparency.

The BABCNC recommends that the updated MLO make explicit that its definition of “Client” (48.02, G) includes the principal person or persons who fund Limited Liability Companies that hire lobbyists or lobbying firms to influence City Matters. To be sure, the updated MLO specifies (48.07, E, 4a) that lobbying firms, in registering, shall provide “if the client is a business or other organization, [the name of] an individual who is an owner or employee with the authority to act on behalf of the client.” But this stipulation seems vague, and it is not altogether clear why it is required of lobbying firms but not of other lobbying entities. In recent years, unscrupulous political donors have used LLCs and various shell companies to conceal their identities and obscure their activities. Any check on such practices would be welcome. Requiring the names of the principal players of LLCs and related organizations would be a step towards greater transparency.

Finally, BABCNC is concerned about the impact that the “major filer” provisions may have on grassroots public participation and recommends that the City consider modifications that ensure burdensome reporting requirements are not unnecessarily imposed.

These recommendations notwithstanding, we very warmly commend the Ethics Commission’s efforts to update the MLO.

This statement was adopted at a duly noticed, public Special Meeting of the Board on November 30, 2022.