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CALIFORNIA



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DOWNTOWN LOS ANGELES NEIGHBORHOOD COUNCIL  
LOS ANGELES, CA 90013

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December 13, 2022

**Re:Community Impact Statement on CF 22-1232: Charter Reform / Ethics Commission /  
Powers and Responsibilities / Ballot Measure**

To Whom It May Concern:

Our city's ethics commission was a model for the nation when it was created over three decades ago, and an update is long overdue. We urge the city to do the work necessary to finalize a proposal for a future ballot. However, rushing this work and waiving it out of committee is patently unacceptable as an answer to the ever evolving scandal at City Hall. This work cannot be done as an election stunt or for good press. It deserves a full and fair hearing in committee with robust discussion.

In a regularly held public meeting of the Board of Directors held on December 13th, 2022, the DLANC board voted in support of CF 22-1232 **if amended** with recommendations below.

We recommend the following specific amendments:

- **Independent Appointment:** The city of LA will not have a truly independent ethics commission until it ends the involvement of elected officials in the appointment process. The incumbent commissioners should be responsible for accepting and vetting applications through a public process like the Oakland and Long Beach Ethics Commissions.
- **Eligibility Requirements:** The commission proposes adding restrictions excluding any bidder, contractor, developer, or someone with a direct financial interest in work of the city from service on the commission. These restrictions are warranted but incomplete. We also recommend excluding anyone who is a recent candidate for the city of LA, former elected officials in the city of LA, and anyone who has donated or raised above a certain threshold for local candidates.
- **Raise the vote threshold for removal of a commissioner:** The commission recommends increasing the number of elected officials who may initiate removal and

reducing the threshold to a majority vote. We recommend requiring a 2/3rds vote for all removal proceedings of ethics commissioners.

- **Increased maximum penalty:** The commission recommends increasing the maximum administrative penalty to \$10k per violation. We recommend adopting Chicago's max penalty of \$20k per violation model.
- **Raise minimum budget:** The commission recommends their budget be set at \$4.5 million and tied to CPI. While this would protect against retaliation or defunding during a financial crunch, this essentially freezes the status quo into the charter. \$4.5 million is a few hundred thousand above the commission's current budget. The recommendations include new expenditures, like outside counsel, which will require more money. If the Council is expanded, ethics will require more money. A minimum budget in the range of \$7-10 million would give the commission the resources needed to fulfill its broad sweeping mandate.

The Ethics Commissions recommendations would largely reflect input received on how to empower the body to enforce the law, meaningfully change policy, and would change power dynamics at city hall. However, they fail to equally enhance the independence of the commission. This could give rise to elected officials strong arming commissioners and meddling with the enforcement actions and policy proposals they carry out.

We appreciate your attention to this matter and your commitment to ensuring the commission is sufficiently independent enough to be entrusted with the expanded power offered.

**\* SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON DECEMBER 13, 2022\***

Sincerely,

Claudia Oliveira  
President,  
DLANC

Jehan Reagan,  
Chair,  
Government Liaison Committee

Cc: Council District 14 (via email)