

## Communication from Public

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**Council File No:** 15-0389-S2

**Comments for Public Posting:** My name is Steven Stanton and I'm a Residential Representative on the Palms Neighborhood Council board. However, I speak on behalf of myself concerning Council File 15-0389-S2. I strongly OPPOSE Council File 15-0389-S2, which grants non-charter entities such as the Brentwood Community Council and the Pacific Palisades Community Council the "Same Privileges As Neighborhood Councils". The reason I'm AGAINST this action is simple: the City already has a process to grant enhanced participation in City government – through the formal Neighborhood Council certification process, which has been in place for over two decades now. All 99 of LA's current chartered NC's which represent the city's approximate 4 million residents had to follow the same process for certification in order to access these privileges. These two organizations representing extremely affluent communities are seeking to subvert the rules, regulations and oversight that govern Neighborhood Councils at both the City and State level by skirting the certification process entirely, in order to enjoy the same privileges. NC's are all subject to extensive government oversight in order to promote transparency, accountability and public participation. Neighborhood Councils are required to comply with the Brown Act, Public Records Act, relevant City ordinances, as well as the policies and rules set by BONC, DONE, the Los Angeles Ethics Commission, and the City Clerk. In addition, all NC board members are also required to complete city training on funding, records requirements, and ethics compliance. Community councils are privately-run entities that are not held to the same standards as NC's, but would be able to influence City decision making in the same way as NC's, which opens up the possibility of corruption, unethical practices and unfair financial advantages. These private groups have the option to certify, but clearly they do not want to change the way they operate, keep records, run elections, govern or receive money in order to become a chartered NC. Their boards may play by their own rules and do not have to comply with such regulations. As a Neighborhood Council board member myself, I'm legally bound to these rules by both the City of LA and State of California, as are NC's. Private money also gives these private organizations an unfair advantage where the wealthy can pay for representation and influence without the same rules, regulations,

transparency, ethics or accountability, which is diametrically opposed to NC funding practices and regulations. NC's must adhere to completely transparent and stringent rules around how it receives and uses money, as well as its board members. The Community Impact Statement is the only tool Neighborhood Councils truly have to formally participate and influence government decision-making. Allowing any group of individuals the same access without the same rules, transparency, regulations and ethics-compliance renders this tool inert by significantly diluting its legitimacy. This action would also vastly weaken any reason for a formal certification process for NC's in the first place. Furthermore, allowing private community groups such as Brentwood or Pacific Palisades offers a route to pay-to-play government access, irreparably harms the credibility of the Neighborhood Council system, and would imply that formal influence on how the City of LA governs is something that could be bought outside of fair, public, democratic elections. Brentwood and Pacific Palisades Community Councils are effectively large HOA's. Councilwoman Park's suggestion in Council File 15-0389-S2 that these organizations are "entities which predate the neighborhood council system" is not a qualifying reason to evade local ordinances or State law. New laws, rules and regulations come into effect all the time which we must comply with. For instance, just because someone got their license before 1986 doesn't mean they could then ignore California's seat belt laws since their status as a driver predates when the new rules came into place. While I've outlined various legal, ethical and transparency issues regarding granting these two private organizations the same privileges as Neighborhood Councils, it also creates one other major problem: equity. All 99 of LA's are bound by these rules and had to certify the same way, while these two private entities are requesting an exemption, which would allow them to maintain any and all unfair advantages they may have over NC's, at the detriment to their community as well as the City of LA. This is a harmful affront to the City's integrity and a slippery slope toward the illegitimation of the entire NC system. In closing, I echo my opening statement: The City already has a process to grant enhanced participation in City government – through a formal Neighborhood Council certification process. Community councils can't have their cake and eat it, too.