

Communication from Public

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Comments for Public Posting: Keep Neighborhoods First, Better Neighbors LA, and Citizens Preserving Venice, which are represented by Randy Renick of Hadsell Stormer Renick & Dai LLP and the Law Office of John P. Givens, are violating City lobbying laws as described below. A lobbyist employer means an entity, other than a lobbying firm, that employs a lobbyist in-house to lobby on its behalf. A lobbyist is an individual who is compensated to spend 30 or more hours in a consecutive three-month period engaged in lobbying activities that include at least one direct communication with a City official or employee to attempt to influence municipal legislation on behalf of another person. LAMC § 48.02. Direct communication may occur by any means and may be conducted either personally or through an agent. Municipal legislation is, essentially, any substantive legislative or administrative matter that is proposed or pending before a City agency. An individual who qualifies as a lobbyist must register with the Ethics Commission within 10 days after the end of the calendar month in which the individual qualifies as a lobbyist. LAMC § 48.07. Lobbyist employers and lobbyists must also file quarterly disclosure reports with the Ethics Commission for every calendar quarter during which they retain that status. LAMC § 48.08(A)(1). The requirement that lobbyist employers and lobbyists disclose their activities is borne out of the public's "right to know the identity of interests which attempt to influence decisions of City government, as well as the means employed by those interests." LAMC § 48.01(B)(2). "City Government functions to serve the needs of all citizens", and "[a]ll persons engaged in compensated lobbying activities aimed at influencing decisions by City government must, when so engaged, be subject to the same regulations, restrictions and requirements...." LAMC §48.01(B)(1), (3). The Municipal Lobbying Ordinance is a content-neutral body of law and applies regardless of which matters are lobbied or what position is taken in a particular matter. The transparency required by the MLO helps to ensure both the integrity of and the public's confidence in City government. Failing to register or report as a lobbying entity circumvents these important goals. From June 2022 through May 2024, Better Neighbors LA c/o Randy Renick (Hadsell Stormer Renick & Dai LLP) and Keep Neighborhoods First c/o John P. Givens (Law Office of John P. Givens), and Citizens Preserving

Venice c/o Robin Rudisill engaged in lobbying activities and had multiple direct communications with City officials regarding various issues, including but not limited to the LA Housing Department regarding 1217 Ocean Front Walk alleging the property was ineligible for transient / short term use. Additionally, Keep Neighborhoods First has an open Public Record Act request with several City departments to obtain a copy of the letter and related materials that might shed light on the City Attorney's action. Better Neighbors LA and Keep Neighborhoods First subsequently filed an appeal on April 23, 2024 and engaged in lobbying activities by being an appellant at the West Los Angeles Area Planning Commission public hearing on March 6, 2024, and at that time, the appellant was still not registered as a lobbyist with the Ethics Commission. The appellants Randy Renick and John P. Givens have engaged in 30 or more hours of lobbying activity in a consecutive three month period and they qualify as a lobbyist in the 2022, 2023, and 2024. As a result, these individuals and organization should be required to file quarterly reports as a lobbyist and lobbyist employer. We urge the Planning and Land Use Management Committee of the City Council to apply the Municipal Lobbying Ordinance regardless of which matters are lobbied or what position is taken in a particular matter. The transparency required by the Municipal Lobbying Ordinance helps to ensure both the integrity of and the public's confidence in City government. Failing to register or report as a lobbying entity circumvents these important goals.