



Los Angeles City Ethics Commission
November 13, 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 13-1414
Appointment of Edward R. Renwick to the
Board of Harbor Commissioners**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On October 22, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Mr. Edward R. Renwick to the Board of Harbor Commissioners. The Ethics Commission received Mr. Renwick's pre-confirmation statement of economic interests (SEI) on November 12, 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 Mr. Renwick to help him avoid potential conflicts of interests that may arise in the course of his tenure as a member of the Board of Harbor Commissioners.

Mr. Renwick reports on his SEI an ownership interest in Raineth, Inc., and in real property located in the City of Los Angeles. Renwick also discloses an ownership interest in Insight Development, LLC, which he reports received income of \$10,000 or more from Hazeltine & Wyandotte, LP. Additionally, he discloses an ownership interest in Wah TG, LLC, which he reports received income of \$10,000 or more from Opus at Echo, LP. Mr. Renwick also discloses his consulting business which he reports received income of \$10,000 or more from Yucaipa, Inc. Finally, Mr. Renwick discloses the investment interests listed on Attachment A.

If a matter involving any of these interests comes before the Board of Harbor Commissioners, Mr. Renwick should, before acting, seek the advice of the City Attorney regarding whether he should disqualify himself. We are unable to assess if or how frequently Mr. Renwick would be in a position of having to recuse himself.

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.

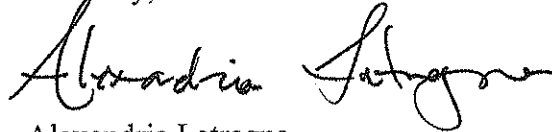
If a matter raises a potential conflict of interests, we encourage Mr. Renwick to seek the advice of the City Attorney before acting. If Mr. Renwick is required to disqualify himself from

acting on a matter, Los Angeles Municipal Code § 49.5.6(J) and Executive Directive 2005-1 require him 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 filing SEIs, nominees also file Residence Verification Forms. We have received a completed form from Mr. Renwick, which states that he 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 "Alexandria Latragna".

Alexandria Latragna
Ethics Program Analyst

Attachment

cc: Mayor Eric Garcetti
Mr. Edward R. Renwick

Attachment A

Edward Renwick
Pre-confirmation Form 700
November 2013

Schedule A-1
Investments (Ownership is Less Than 10%)

Yucaipa American Affiliate II, LLC
Yucaipa American Affiliate, LLC
Yucaipa American Alliance Fund I,
LLC
Yucaipa American Alliance Fund II,
LLC
Yucaipa American Management,
LLC
Yucaipa Corporate Affiliate II, LLC
Yucaipa Corporate Initiatives Fund
I, LLC
Yucaipa Global Affiliate, LLC