

Under section 48.08.8 of the [current lobbying ordinance](#), a lobbyist disclosure is only required for written communications to neighborhood councils. We believe the ordinance should be updated to include the same disclosure when a lobbyist makes an oral presentation or public comment to a neighborhood council that is related to their lobbying efforts. Therefore, we deeply agree with section 48.11 of the [draft municipal lobbying ordinance](#) under consideration.

As you may be aware, neighborhood councils continue to meet telephonically due to COVID and it is widely expected that this will continue in at least some form even when/if the pandemic passes. Additionally, under AB 361, we are prohibited from requiring "speaker cards," which is where traditionally lobbying disclosures had happened on our council. While the Sunland-Tujunga Neighborhood Council can require a disclosure for its own meetings, that disclosure has no teeth for enforcement as it is not an ordinance and it also does not address the other 98 neighborhood councils which similarly serve as elected advisory bodies to the city.

We believe the lack of oral lobbyist disclosure requirement leaves many neighborhood council board members at an information disadvantage and that it should be addressed for the following reasons:

- 1) **Transparency.** We believe every voting member at a board meeting has the right to the knowledge if a lobbyist is speaking on an item for which they are compensated to lobby.
- 2) **Diffusion of responsibility.** A lobbyist may send a correct written disclosure either via mail or email, but often these communications do not go to every member of the board. Unless the board member is diligent in passing along these communications, then it is possible there would be other members of the board who do not know of the lobbyist status of the individual speaking.
- 3) **Lack of training.** We do not receive training on identifying or looking up lobbyist activities in the city through the Department of Neighborhood Empowerment. We believe the legal onus should be on the lobbyist to be as upfront and straightforward with the board as possible. Additionally, the responsibility is then on the paid lobbyist rather than the volunteer board member when it comes to the pursuit of this information.

In addition, the Sunland-Tujunga Neighborhood Council would like to request a similar lobbying disclosure for city council and committee meetings. This announcement could either be done by the lobbyist or by the presiding officer of the meeting in order to ensure that the public is fully aware of the associations of all speakers who are paid lobbyists. Neighborhood council members frequently listen to city council meetings or recordings of the meetings and we strongly feel that this minor addition would bring greater transparency to the City processes. We urge the City Council to adopt this minor change.

Lastly, the Sunland-Tujunga Neighborhood Council urges the City Council to adopt a non profit exemption of \$200,000 in revenue or \$500,000 in assets instead of the proposed \$2,000,000. This change aligns with the IRS tax filing system and would essentially allow any non profit that files a 990-N or 990-EZ to gain exemption. This change also reflects the current [San Francisco ethics ordinance](#). The current recommendation of \$2 million in revenue is far too high and would exempt the vast majority of nonprofits in Southern California. Only 16% of Southern California non profits have revenues above \$1 million, so an exemption set at twice that amount would have a grave effect on transparency.

Thank you for your consideration of this topic,

Sunland-Tujunga Neighborhood Council

4. ADJOURN

PUBLIC INPUT AT NEIGHBORHOOD COUNCIL MEETINGS: Every person wishing to address the Board must dial **(888) 475-4499** or **(669) 900 6833**, and enter **918 9278 5703** and then press # to join the meeting. When

prompted by the presiding officer, to provide public comment at the Sunland-Tujunga Neighborhood Council meeting the public will be requested to dial ***9 or use the Raise Hand option**, to address the Committee on any agenda item before the Board takes an action on an item. Comments from the public on agenda items will be heard only when the respective item is being considered. Comments from the public on other matters not appearing on the agenda that are within the Board's jurisdiction will be heard during the General Public Comment period. Please note that under the Brown Act, the Board is prevented from acting on a matter that you bring to its attention during the General Public Comment period however, the issue raised by a member of the public may become the subject of a future Board meeting. Public comment is limited to two minutes per speaker, unless adjusted by the presiding officer of the Board.

AB 361 Updates: Public comment cannot be required to be submitted in advance of the meeting, only real-time public comment is required. If there are any broadcasting interruptions that prevent the public from observing or hearing the meeting, the meeting must be recessed or adjourned. If members of the public are unable to provide public comment or be heard due to issues within the Sunland-Tujunga Neighborhood Council's control, the meeting must be recessed or adjourned.

The Neighborhood Council system enables meaningful civic participation for all Angelenos and serves as a voice for improving government responsiveness to local communities and their needs. We are an advisory body to the City of Los Angeles, comprised of stakeholder volunteers who are devoted to the mission of improving our communities.

Unless otherwise specified, all items on the meeting agenda are for Discussion and Possible Action and may be taken out of order at the discretion of the President. This is an online virtual meeting, please understand that there may be some connection delays from time to time.

THE AMERICAN WITH DISABILITIES ACT As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request will provide reasonable accommodation to ensure equal access to its programs, services, and activities. Sign language interpreters, assisted listening devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability of services, please make your request at least 3 business days (72 hours) prior to the meeting by contacting Lydia Grant, STNC President at 818-470-6629.

PUBLIC ACCESS OF RECORDS – In compliance with Government Code section 54957.5, non-exempt writings that are distributed to a majority or all of the board in advance of a meeting may be viewed at our website: www.stnc.org or at the scheduled meeting. In addition, if you would like a copy of any record related to an item on the agenda, please contact **Carol Hutchinson, Secretary, at email: secretary@stnc.org**.

PUBLIC POSTING OF AGENDAS – Neighborhood Council agendas are posted for public review as follows:

* **NORTH VALLEY NEIGHBORHOOD CITY HALL**, 7747 Foothill Blvd, Tujunga, CA 91042

* www.stnc.org

* You can also receive our agendas via email by subscribing to L.A. City's Early Notification System at <https://www.lacity.org/subscriptions>

NOTICE TO PAID REPRESENTATIVES - If you are compensated to monitor, attend, or speak at this meeting, City law may require you to register as a lobbyist and report your activity. See Los Angeles Municipal Code §§ 48.01 et seq. More information is available at ethics.lacity.org/lobbying. For assistance, please contact the Ethics Commission at (213) 978-1960 or ethics.commission@lacity.org

RECONSIDERATION AND GRIEVANCE PROCESS - For information on the STNC's process for board action reconsideration, stakeholder grievance policy, or any other procedural matters related to this Council, please consult the Sunland-Tujunga Neighborhood Council Bylaws. The Bylaws are available on our website www.stnc.org