

Letter to the Los Angeles City Ethics Commission on  
the proposed stipulation in Case No. 2016-13, *In the  
Matter of Marie Rumsey.*

[REDACTED]  
Los Angeles, CA 900 [REDACTED]

[REDACTED]  
December 4, 2016

Dear Ethics Commissioners,

I am writing to urge you not to accept the proposed stipulation in CEC Case Number 2016-13, *In the Matter of Marie Rumsey*. First, the stipulation covers Ms. Rumsey's lobbying activities only in June and July of 2015. It is clear from the public record that she engaged in lobbying over a greater time span than that. I understand that it is desirable for many reasons to obtain a stipulation, and that in order to do so it may be necessary not to include every single one of the respondent's violations, but some of the instances omitted here are particularly egregious. I describe one example below.

Furthermore, Ms. Rumsey's explanation for her violations seems to be contradicted by her own actions during 2015. According to the staff report which accompanies the proposed stipulation in this case,

Rumsey received inaccurate legal advice from CCA's former legal counsel and mistakenly believed that she could attempt to influence any City agency except Councilmember O'Farrell's office.

Now, you can see from the appended speaker card that Ms. Rumsey attended the November 17, 2015 meeting of the Los Angeles City Council intending to speak. That she did in fact speak is proven by [the video record of the meeting at 1:55:16](#)<sup>1</sup> Now, if Ms. Rumsey's excuse is to be believed, we are asked to accept as a fact that she thought she was forbidden from attempting to influence Mitch O'Farrell's "office" while at the same time thinking that she was allowed to attempt to influence Mitch O'Farrell himself. The video suggests that Councilmember O'Farrell was not present in the chamber during Ms. Rumsey's comment, but of course the audio of the meeting is transmitted throughout the areas that Councilmembers retreat to. And the record shows that O'Farrell voted yes on the matter under consideration. That anyone, especially someone who worked for the City of Los Angeles for fourteen years, as Ms. Rumsey did, and who therefore attended multiple Ethics training sessions, could honestly believe that there was a distinction with a difference to be found here, is implausible to say the least.

Finally, before Ms. Rumsey speaks, Council President Herb Wesson, as he calls her to the lectern, says "Ms. Ramsey, [*sic*] welcome home, good to see you." Thus this incident not only shows Ms. Rumsey violating [LAMC 49.5.13\(C\)\(1\)](#), it not only suggests that Councilmember Mitch O'Farrell listened to her comment without objecting as she violates the law, but it also shows Herb Wesson not only not objecting to her violation but in some sense celebrating her presence.

One of the findings adopted in conjunction with the Government Ethics Ordinance, at [LAMC 49.5.1\(B\)\(2\)](#), states that "One of the best ways to attract talented people to public service is to assure that the government is respected for its honesty and integrity." One of the stated purposes of the law, at (C)(7), is "To help restore public trust in governmental and electoral institutions." Seeing the president of the City Council act so hospitably to someone who is violating a City ordinance right before his very eyes is sufficiently subversive

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<sup>1</sup>The link is to a copy of the video I put on YouTube so as to be able to link to the exact time when Ms. Rumsey begins speaking. The video is [available directly from the City](#) as well. If you're not reading this on a computer, the YouTube URL is <https://youtu.be/k5CByWdR9jI?t=6916> and the City URL is [http://lacity.granicus.com/MediaPlayer.php?view\\_id=129&clip\\_id=15299](http://lacity.granicus.com/MediaPlayer.php?view_id=129&clip_id=15299)

of these goals. Allowing this violation, which directly contradicts Ms. Rumsey's explanation for her actions, to go unmentioned in her stipulation is far more subversive of this finding and this purpose.

I urge you therefore to reject the proposed stipulation, to carry out a more extensive investigation to determine the full extent of Ms. Rumsey's violations, and to make sure that all of these violations are taken into account when deciding on an appropriate penalty. Furthermore, I ask you to investigate whether Herb Wesson, Mitch O'Farrell, and other City officials who knew or who should have known that Ms. Rumsey repeatedly violated LAMC 49.5.13(C)(1) during 2015 are themselves guilty of aiding or abetting her violations, which is forbidden by [LAMC 49.5.16\(A\)\(1\)\(c\)](#).

Finally, whether or not you adopt my reasoning, whether or not you decide to accept the proposed stipulation, I would like to thank you and your investigative staff for accepting and investigating this case. Clearly reasonable people can disagree about the proper disposition of such matters. The fact, though, that your commission handles cases like this one speaks well of our City irrespective of the disposition of any individual issue.

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Los Angeles, CA 900██████

# 1 Exhibits

1.1 Exhibit 1 – November 17, 2015 Marie Rumsey speaker card

## CITY OF LOS ANGELES SPEAKER CARD

**NOTE: THIS IS A PUBLIC DOCUMENT SUBJECT TO POSTING ON THE CITY'S WEBSITE.  
YOU ARE NOT REQUIRED TO PROVIDE PERSONAL INFORMATION IN ORDER TO SPEAK,  
EXCEPT TO THE EXTENT NECESSARY FOR THE PRESIDING OFFICER TO CALL UPON YOU**

Date  
11-17-15

**THE CITY COUNCIL'S RULES OF  
DECORUM WILL BE ENFORCED.**

Council File No., Agenda Item, or Case No.  
16

I wish to speak before the City Council  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal  
( ) Against proposal  
 General comments

Name: Marie Ramsey

Business or Organization Affiliation: CCA

Address: 626 Wilshire Blvd. # 200  
Street City State Zip

Business phone: \_\_\_\_\_ Representing: \_\_\_\_\_

**CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:**

Client Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Client Address: \_\_\_\_\_  
Street City State Zip

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.