

Report to the Los Angeles City Ethics Commission
about violations of the Municipal Lobbying Ordinance
by the Central City Association of Los Angeles and
John Howland

July 5, 2017

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¹Note that [blue text](#) indicates clickable links internal to this document whereas [green text](#) indicates clickable links to resources on the Internet.

1 Synopsis

1. The Central City Association of Los Angeles failed to timely amend its 2017 registration form. Its former employee, registered lobbyist John Howland, failed to disclose all City agencies he lobbied in Q1 2017. It's possible that these omissions, in addition to violating the Municipal Lobbying Ordinance, may have influenced the outcome of the Skid Row Neighborhood Council formation election on April 6, 2017.

2 Background

2. In December 2016 the Skid Row Neighborhood Council – Formation Committee (“SRNC-FC”) applied to the Los Angeles City Department of Neighborhood Empowerment (“DONE”) for the formation of a Skid Row Neighborhood Council (“SRNC”).
3. At the time that the SRNC-FC applied to form the SRNC, online voting was not allowed in neighborhood council elections. Persons opposed to the SRNC formation effort supported online voting in the SRNC formation election.
4. An election was held by DONE on April 6, 2017. The final vote tally was 824 against SRNC formation to 764 in favor of formation.
5. DONE is overseen by the Board of Neighborhood Commissioners (“BONC”).
6. The Central City Association of Los Angeles (“CCALA”) is a lobbyist employer registered with the City Ethics Commission in 2017. John Howland is a lobbyist registered with the City Ethics Commission in 2017. He was employed by CCALA from January 1, 2017 through March 31, 2017. Joanne Danganan is a lobbyist registered with the City Ethics Commission in 2017. She has been employed by CCALA at least since January 1, 2017.

3 Facts

7. The Los Angeles City Council has been deliberating over whether to allow online voting in neighborhood council elections (“online voting”) since about November 2016. The associated Council File is [CF 15-1022-S2](#).
8. At a meeting on March 20, 2017 BONC heard testimony and comments on online voting with the intention of recommending a course of action to the Rules and Elections Committee. John Howland commented at this meeting in favor of online voting. He identified himself as speaking on behalf of CCALA. Audio of the meeting is available from DONE and is also [available on Archive.Org](#). His speaker card from this meeting is [Exhibit 1](#) on page 7.²

²This copy of the card was redacted by DONE before they gave it to me in response to a Public Records Act request.

9. Joanne Danganan spoke in favor of online voting on March 22, 2017 at a meeting of the Rules and Elections Committee. She identified herself as speaking on behalf of CCALA. Her speaker card from this meeting is [Exhibit 2](#) on page 9.
10. On March 24, 2017 City Council adopted a report from the Rules and Elections Committee allowing online voting for the SRNC election only. See [Exhibit 3](#) on page 11.
11. On April 24, 2017, CCALA filed its third amended registration form with CEC. This form did not mention the SRNC as an issue that CCALA was lobbying on. See [Exhibit 4](#) on page 13.
12. On April 28, 2017, CCALA filed its fourth amended registration form with CEC. This form did mention the SRNC as an issue that CCALA was lobbying on. See [Exhibit 5](#) on page 16.
13. On May 1, 2017 John Howland filed his first quarterly report for 2017. He listed neither BONC nor DONE among the agencies he lobbied. See [Exhibit 6](#) on page 19.

4 Conclusions

14. The decision to allow online voting in the SRNC formation election is municipal legislation as defined in the MLO.
15. CCALA lobbied in favor of online voting, and therefore against SRNC formation, beginning no later than March 20, 2017.
16. CCALA's anti-SRNC lobbying effort was coordinated enough to involve more than one lobbyist, which suggests that their work on the issue began even earlier than March 20, 2017.
17. CCALA was bound by law to amend their annual registration form no later than March 30, 2017. They did not amend it until more than four weeks later.
18. John Howland was bound by law to disclose the fact on his first quarterly report that he lobbied BONC during Q1 2017. He did not disclose this fact.

5 Why these violations are more consequential than they may at first appear

19. The SRNC formation election was held on April 6, 2017. Since the SRNC formation failed by only 60 votes, it would only have been necessary for 31 voters (out of 1,590 people who voted) to change their minds or 61 new pro-formation voters (out of tens of thousands eligible) to decide to vote in order for the outcome of the election to be changed. If CCALA had disclosed its involvement in a timely manner it would have allowed SRNC proponents at least one week to use the information in the election

campaign. It's not implausible, therefore, that CCALA's violation of the law changed the outcome of the formation election.

6 Exhibits

6.1 Exhibit 1 – John Howland’s speaker card from March 20, 2017 meeting of BONC

BOARD OF NEIGHBORHOOD COMMISSIONERS

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
3-20-17

SPEAKER CARD

Agenda Item Number
11

I wish to provide GENERAL COMMENTS regarding this agenda item

I do NOT wish to speak, but want to be recorded as: FOR this item AGAINST this item

Name: JOHN HOWLAND

Business or Organization Affiliation: CENTRAL CITY ASSOCIATION

Address: [REDACTED]

Business Phone: [REDACTED] State: [REDACTED] Zip: [REDACTED]

Representing: [REDACTED] Email: [REDACTED]

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

6.2 Exhibit 2 – Joanne Danganan’s speaker card from March 22, 2017 meeting of Rules and Elections Committee

CITY OF LOS ANGELES SPEAKER CARD

Date
3/22/17

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

Council File No., Agenda Item, or Case No.
15-1022-S2

I wish to speak before the RULES, ELECTIONS, INTERGOV RELS COMMITTEE
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: JOANNE DANGANAN

Business or Organization Affiliation: CENTRAL CITY ASSOCIATION

Address: 626 WILSHIRE BLVD, STE 200 L.A., CA 90017
Street City State Zip

Business phone: 213.416.7511 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.

6.3 Exhibit 3 – March 24, 2017 Council Action on online voting for SRNC election

HOLLY L. WOLCOTT
CITY CLERK

SHANNON D. HOPPE
EXECUTIVE OFFICER

City of Los Angeles
CALIFORNIA



ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

BRIAN E. WALTERS
DIVISION CHIEF

CLERK.LACITY.ORG

When making inquiries relative to
this matter, please refer to the
Council File No.: [15-1022-S2](#)

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

March 28, 2017

Council File No.: [15-1022-S2](#)

Council Meeting Date: March 24, 2017

Agenda Item No.: 11

Agenda Description: RULES, ELECTIONS, INTERGOVERNMENTAL RELATIONS, AND NEIGHBORHOODS COMMITTEE REPORT relative to online voting pilot for Neighborhood Council elections.

Council Action: RULES, ELECTIONS, INTERGOVERNMENTAL RELATIONS, AND NEIGHBORHOODS (REIGN) COMMITTEE REPORT - ADOPTED

Council Vote:

YES	BOB BLUMENFIELD
ABSENT	MIKE BONIN
YES	JOE BUSCAINO
YES	GILBERT A. CEDILLO
ABSENT	MITCHELL ENGLANDER
YES	MARQUEECE HARRIS-DAWSON
YES	JOSE HUIZAR
YES	PAUL KORETZ
NO	PAUL KREKORIAN
YES	NURY MARTINEZ
YES	MITCH O'FARRELL
YES	CURREN D. PRICE
YES	DAVID RYU
YES	HERB WESSON

HOLLY L. WOLCOTT
CITY CLERK

6.4 Exhibit 4 – CCALA third amended registration form (April 24, 2017)



Ethics Commission
 200 N Spring Street
 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYIST EMPLOYER REGISTRATION FORM

Form 31-LE

Filer Information

Amendment 3

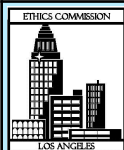
NAME OF LOBBYIST EMPLOYER: Central City Association of Los Angeles	DATE QUALIFIED AS LOBBYIST EMPLOYER: Jan 01, 2017
BUSINESS ADDRESS: (Number and Street) (street address redacted)	
CITY, STATE, ZIP CODE: Los Angeles, CA 90017	TELEPHONE NUMBER: (213) 624-1213
E-MAIL: lacitylobbying@campaignlawyers.com	FAX NUMBER: (Optional) (213) 624-0858

I. INDIVIDUAL LOBBYISTS

Joanne Danganan	John Howland
Name	Name
Jessica Lall	Marie Rumsey
Name	Name

II. MUNICIPAL LEGISLATION/PROJECTS AND AGENCIES LOBBIED

Agencies to be lobbied ANY CITY AGENCY
Municipal Legislation / Projects (1) 1st and Broadway Civic Center Park (2) 2024 Olympics Bid (3) 7th Street Design (4) Above grade parking (5) Accessory Dwelling Units (6) Affordable Housing Requirements (7) Arts District Metro Station (8) Bay Delta Conservation Plan (9) Bike parking ordinance (10) BikeShare Plan (11) Business Tax (12) CEQA Reform (13) Comprehensive Jobs Plan (14) Convention Center Modernization (15) Council's Jobs Program (16) DASH Routes (17) Downtown LA Mobility Plan (18) Downtown street car (19) DTLA Forward Initiative (20) DTLA Zoning (21) Economic Development RFP (22) Education Issues (23) Ellis Amendments (24) General Advocacy (25) Homelessness (26) Housing Issues (27) Jobs & Economic Development Strategy (28) LA River (29) LAMC 56.11 (30) LAX Modernization (31) Legalized Sidewalk Vending Ordinance (32) Linkage Fee (33) My Figueroa Plan (34) Parcel Q (35) Park Fee Update (36) Pershing Square Renew (37) Rent stabilization ordinance (38) Responsible banking ordinance (39) SB 743 Implementation (40) Seismic Retrofit/PACE loans (41) Short Term Rentals



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(213) 978-1960
ethics.lacity.org

LOBBYIST EMPLOYER REGISTRATION FORM **Form 31-LE**

- (42) Sidewalk Repair
- (43) Sign Ordinance
- (44) Tree Removal
- (45) TV & Movie Filming Issues
- (46) Value Capture Ordinance

III. VERIFICATION

I have used all reasonable diligence in preparing this form and any attachments. I have reviewed the form and all the attachments and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

24-Apr-17

Jessica Lall (e-signed)

Executed On: (Date)

By: (Signature of Authorized Person)

AMENDED

6.5 Exhibit 5 – CCALA fourth amended registration form (April 28, 2017)



Ethics Commission
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 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYIST EMPLOYER REGISTRATION FORM

Form 31-LE

Filer Information

Amendment 4

NAME OF LOBBYIST EMPLOYER: Central City Association of Los Angeles	DATE QUALIFIED AS LOBBYIST EMPLOYER: Jan 01, 2017
BUSINESS ADDRESS: (Number and Street) (street address redacted)	
CITY, STATE, ZIP CODE: Los Angeles, CA 90017	TELEPHONE NUMBER: (213) 624-1213
E-MAIL: lacitylobbying@campaignlawyers.com	FAX NUMBER: (Optional) (213) 624-0858

I. INDIVIDUAL LOBBYISTS

Joanne Danganan	John Howland (Termed: Mar 31)
Name	Name
Jessica Lall	Marie Rumsey
Name	Name

II. MUNICIPAL LEGISLATION/PROJECTS AND AGENCIES LOBBIED

Agencies to be lobbied ANY CITY AGENCY
Municipal Legislation / Projects (1) 1122 W. Washington Blvd. (2) 1st and Broadway Civic Center Park (3) 2024 Olympics Bid (4) 2110 Bay Street (5) 333 S. La Cienega (6) 6th St. PARC (7) 7th Street Design (8) Above grade parking (9) Accessory Dwelling Units (10) Affordable Housing Requirements (11) Aliso Canyon Closure (12) Arts District Metro Station (13) Bay Delta Conservation Plan (14) Big Jump Grant (15) Bike parking ordinance (16) BikeShare Plan (17) Business Tax (18) Cap & Trade Program (19) CEQA Reform (20) Civic Center Master Plan (21) College Station (22) Comprehensive City Planning (23) Comprehensive Jobs Plan (24) Convention Center Modernization (25) Council's Jobs Program (26) CPA-2016-3824-GPA-VZC-HD-MS-SPR (27) CPC-2016-3479-GPA-VZC-DB-SPR (28) CPC-2016-3683-GPA-VZC-HD-SPR and ENV-2016-3685-EAF (29) DASH Routes (30) Downtown Design Guidelines (31) Downtown LA Mobility Plan (32) Downtown street car (33) DTLA 2040 (34) DTLA Forward Initiative (35) DTLA Zoning (36) Economic Development RFP (37) Education Issues (38) Ellis Amendments (39) ENV-2016-3825-EAF (40) Food Truck Ticketing Policy (41) General Advocacy





LOBBYIST EMPLOYER REGISTRATION FORM
Form 31-LE

- (42) General Plan Update
- (43) Homelessness
- (44) Housing Issues
- (45) Hoxton Hotel
- (46) Jinya Restaurant
- (47) Jobs & Economic Development Strategy
- (48) LA River
- (49) LAMC 56.11
- (50) LAMC 85.02
- (51) LAX Modernization
- (52) Legalized Sidewalk Vending Ordinance
- (53) Linkage Fee
- (54) Metro Division 20 Project
- (55) My Figueroa Plan
- (56) Parcel Q
- (57) Park Center
- (58) Park Fee
- (59) Performance Based Permitting
- (60) Pershing Square Renew
- (61) Planning Budget
- (62) Procedural Time Code Amendment
- (63) Rent stabilization ordinance
- (64) Responsible Banking Ordinance
- (65) SB 743 Implementation
- (66) Seismic Retrofit/PACE loans
- (67) Short Term Rentals
- (68) Sidewalk Repair
- (69) Sign Ordinance
- (70) Single Use Restroom
- (71) Skid Row Neighborhood Council
- (72) The Alexan
- (73) Transit Oriented Communities Guidelines
- (74) Tree In Lieu Fee
- (75) Tree Removal
- (76) TV & Movie Filming Issues
- (77) Value Capture Ordinance
- (78) VTT-74564
- (79) VTT-74640
- (80) Way-finding Signage
- (81) ZA-20163025-ZV and ENV-2016-3026-CE

RECOMMENDED

III. VERIFICATION

I have used all reasonable diligence in preparing this form and any attachments. I have reviewed the form and all the attachments and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

28-Apr-17

Jessica Lall (e-signed)

Executed On: (Date)

By: (Signature of Authorized Person)

6.6 Exhibit 6 – John Howland’s Q1 lobbying report (May 1, 2017)



Ethics Commission
 200 N Spring Street
 City Hall - 24th Floor
 Los Angeles, CA 90012
 (213) 978-1960
 ethics.lacity.org

LOBBYIST QUARTERLY REPORT

Form 33

John Howland (Central City Association of Los Angeles)
 FOR THE CALENDAR QUARTER ENDING **Mar 31, 2017**

NAME OF LOBBYIST : Howland, John	TELEPHONE NUMBER: (213) 624-1213	FAX NUMBER:
--	--	-------------

NAME OF LOBBYIST FIRM OR LOBBYIST EMPLOYER: Central City Association of Los Angeles

BUSINESS ADDRESS: 626 Wilshire Boulevard #200	(City, State Zip) Los Angeles, CA 90017	E-MAIL: lacitylobbying@campaignlawyers.com
---	---	--

Part I - SUMMARY OF ACTIVITY

A. Total Political Contributions: (from Grand Total in Part II)	\$0.00
B. Behested Contributions to Elective City Officers and Candidates for Elective City Office: (from Grand Total in Part III)	\$0.00
C. Total Fundraising Activity: (from Grand Total in Part IV)	\$0.00
D. Fundraising Solicitations: ([x] if Fundrasing Solicitations reported in Part V)	[]
E. Total Behested Donations: (from Grand Total in Part VI)	\$0.00
F. Total Activity Expenses: (from Grand Total in Part VII)	\$0.00
G. Total Payments from City Candidate and Ballot Measure Committees: (from Total in Part VIII)	\$0.00
H. Total Payments from City Agencies: (from Total in Part IX)	\$0.00
I. Grand Total Payments Received: (G+H above)	\$0.00

VERIFICATION

I have used all reasonable diligence in completing this form and attachments. I have reviewed the form and any attachments and to the best of my knowledge the information contained herein is true and complete.

I certify under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

01-May-17

John Howland (e-signed)

Executed On: (Date)

By: (Signature of Lobbyist)



Ethics Commission
200 N Spring Street
City Hall - 24th Floor
Los Angeles, CA 90012
(213) 978-1960
ethics.lacity.org

LOBBYIST QUARTERLY REPORT

Form 33

John Howland (Central City Association of Los Angeles)
FOR THE CALENDAR QUARTER ENDING **Mar 31, 2017**

Part X - AGENCIES LOBBIED

Employer

Central City Association of Los Angeles

Agencies Lobbied

Mayor, Office of; City Council; Airports, Los Angeles World (LAWA, LAX); Building and Safety; Planning, City; Public Works, Engineering; Recreation & Parks; Transportation (LADOT, DOT)