



Los Angeles City Ethics Commission

May 23, 2013

The Honorable City Council
c/o June Lagmay, City Clerk
200 North Spring Street
City Hall – 3rd Floor
Los Angeles CA 90012

**Re: Council File Number 13-0525
Appointment of Pedram Salimpour to the
Board of Fire and Police Pension Commissioners**

FOR COUNCIL CONSIDERATION

Dear Councilmembers:

On May 1, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Mr. Pedram Salimpour to the Board of Fire and Police Pension Commissioners. The Ethics Commission received Mr. Salimpour's pre-confirmation statement of economic interests (SEI) on May 22, 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. Salimpour to help him avoid potential conflicts of interests that may arise in the course of his tenure as a member of the Board of Fire and Police Pension Commissioners.

Mr. Salimpour reports on his SEI an investment interest in Plymouth Holdings I, LLC. In addition, he reports several ownership interests and single sources of income of \$10,000 or more, which are listed in Attachments A and B. Finally, Mr. Salimpour discloses an interest in real property from which he has received rental income of \$10,000 or more from Mr. James Eustice. If a matter involving any of these interests comes before the Board of Fire and Police Commissioners, Mr. Salimpour 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. Salimpour 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. Salimpour to seek the advice of the City Attorney before acting. If Mr. Salimpour 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 reviewing a nominee's SEI, the Ethics Commission also verifies that the nominee is a registered City voter. We have received a completed Residence Verification Form for Mr. Salimpour, which affirms that he is registered to vote in the City.

If you have questions, please feel free to contact Ethics Program Manager Shannon Prior at (213) 978-1960.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Holt", with a stylized flourish at the end.

Heather Holt
Executive Director

Attachments

cc: Mayor Antonio Villaraigosa
Mr. Pedram Salimpour

Attachment A

Pedram Salimpour

Pre-confirmation Form 700

May 2013

Schedule A-2

Investments, Income, and Assets of Business Entities/Trusts

(Ownership Interest is 10% or Greater)

<i>Entity or Trust</i>	<i>Investments and Real Property Held by the Entity or Trust Where Filer's Pro Rata Share is \$2,000 or More</i>
Carenex, LLC	
Plymouth Holdings II, Inc.	Plymouth Health LLC
Plymouth Holdings III, Inc.	Plymouth Health LLC
PPS Capital Investments LLC	6618 Van Nuys Boulevard, Van Nuys, CA
PS Two LLC	
PS Two Tiger-Text LLC	Tigertext, Inc.
RPPS Three LLC	OBGYN Hospital Specialist of the Valley LLC
RPPS-Oviedo Properties, LLC	

Attachment B

Pedram Salimpour
Pre-confirmation Form 700
May 2013

Schedule A-2
Single Sources of \$10,000 or More

Salimpour Pediatric Medical Group
OBGYN Hospital Specialists of the Valley LLC