

Communication from Public

Name: Neighborhood Council Sustainability Alliance

Date Submitted: 06/12/2023 08:21 AM

Council File No: 22-0560

Comments for Public Posting: The Neighborhood Council Sustainability Alliance has voted to support a robust update to the municipal lobbying ordinance (Council File 22-0560) that will close current loopholes without creating new ones. Specifically, 1) We do not support broad exemptions for labor unions. October's leaked recordings regarding redistricting speak for themselves, and no other city in the country has broad exemptions for them. 2) Also, we are concerned about having too high an income threshold for 501(c)(3) exemptions given the problem of front (or astroturf) organizations, among other problematic nonprofits. Keeping the threshold in alignment with the limit for spending federal dollars before necessitating an audit (currently less than \$750,000) might work. We do support waiving fees for 501(c)(3)s, and support the Ethics Commission staff's ability to provide guidance for filers. 3) Lastly, we are concerned about the fact that the proposed nonprofit filers could also serve as commissioners, and hope that our beautiful city has enough knowledgeable and interested people in it that we can find commissioners who are not also nonprofit filers or lobbyists. We want to thank Jamie York of the Reseda Neighborhood Council for highlighting this issue for us and for so many others.



June 12, 2023

Dear City Council Ad Hoc Governance Reform Committee members:

The Neighborhood Council Sustainability Alliance has voted to support a robust update to the municipal lobbying ordinance ([Council File 22-0560](#)) that will close current loopholes without creating new ones.

Specifically,

- 1) We do not support broad exemptions for labor unions. October's leaked recordings regarding redistricting speak for themselves, and no other city in the country has broad exemptions for them.
- 2) Also, we are concerned about having too high an income threshold for 501(c)(3) exemptions given the problem of front (or astroturf) organizations, among other problematic nonprofits. Keeping the threshold in alignment with the limit for spending federal dollars before necessitating an audit (currently less than \$750,000) might work. We do support waiving fees for 501(c)(3)s, and support the Ethics Commission staff's ability to provide guidance for filers.
- 3) Lastly, we are concerned about the fact that the proposed nonprofit filers could also serve as commissioners, and hope that our beautiful city has enough knowledgeable and interested people in it that we can find commissioners who are not also nonprofit filers or lobbyists.

We want to thank Jamie York of the Reseda Neighborhood Council for highlighting this issue for us and for so many others.

Thank you,

A handwritten signature in black ink that reads "Lisa Hart". The signature is written in a cursive, flowing style.

Lisa Hart
Executive Director