

Communication from Public

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Date Submitted: 10/20/2025 11:41 AM
Council File No: 22-0560
Comments for Public Posting: Attached, please find a letter from the California Apartment Association regarding this issue.



California Apartment Association
Los Angeles County

October 20, 2025

Council President Harris-Dawson
Rules and Elections Committee
City of Los Angeles
VIA Email

RE: Lobbying Ordinance Updates- ([C.F. 22-0560](#))

Dear Council President Harris-Dawson,

The California Apartment Association (CAA) represents housing providers, operators, suppliers, and business owners across Los Angeles, from single-family rentals to large apartment communities. We appreciate the Ethics Commission's work to strengthen the City's lobbying ordinance, as transparency in advocacy is essential to public trust.

However, we are concerned that some of the proposed exemptions create significant loopholes that undermine the ordinance's intent. As drafted, organizations could avoid lobbyist registration under certain criteria. In practice, this would allow large, well-funded organizations with professional advocacy staff to operate outside disclosure requirements simply by characterizing their mission broadly. Groups that actively lobby on housing, land use, labor, and regulatory matters that affect all residents should not be exempt. When organizations with employees, funding, and structure devote resources to influencing legislation, they should be required to register; particularly when their efforts may negatively impact other constituencies.

The \$2 million receipts threshold further compounds this issue by creating a carve-out for some organizations, regardless of whether their primary activity is lobbying. Together, these provisions risk exempting both large and small advocacy groups from oversight, while other stakeholders remain subject to strict reporting requirements.

The City's ordinance should apply equally to all who seek to influence local decisions. The City should either restore the earlier, more limited exemption language or adopt narrower language confined to groups with truly minimal lobbying activity. This would better balance reducing compliance burdens with protecting the public interest.

We respectfully urge the Committee to refine the exemption while maintaining the principle that all lobbying entities are subject to the same rules. Equal treatment fosters fairness, reduces selective enforcement, and strengthens confidence in local lawmaking.

Sincerely,

Fred Sutton
California Apartment Association