

**To:** The Honorable Members of the Los Angeles City Ethics Commission  
**From:** Jay Beeber, Chair, Government Affairs Committee, Sherman Oaks Neighborhood Council  
**RE:** Recommendations Regarding Contribution Limits, Fundraising Windows, and Officeholder Accounts

February 23, 2012

Commission Members,


The Government Affairs Committee of the Sherman Oaks Neighborhood Council will be discussing the Proposed Changes to the Campaign Finance Laws at our next meeting. Since neither our Committee nor the full Council has had time to fully review and take a position on the proposed changes, the comments below reflect only my personal views at this time.

Regarding the proposed changes overall, I urge the Commission to delay a final decision until Neighborhood Councils have had a chance to review any specific proposed changes. The Committees of the Councils and the Councils themselves usually meet once per month. Under most circumstances, review of any Proposed Changes to the Campaign Finance Laws must first be undertaken by committee and then recommendations sent to the full Council for approval. Since it is impossible for us to comment on proposed changes before they are released by the Commission, Neighborhood Councils often may not have enough time for the proposals to be reviewed under our regular timeframe, effectively shutting us out of the review process. I am sure that this is not the intention of the Commission. Therefore, I urge you not to take final action on any proposed Finance Law changes until Neighborhood Councils have had sufficient time to review those proposals, a process that would likely take at least one to two months from the time the proposals are released.

Regarding changes to the City Campaign Contribution Limits currently being considered, I would recommend that any changes not take effect during the current election cycle, but rather take effect for subsequent elections. Also, regarding the Commission's recommendation to more than double the current contribution limits, I would recommend phasing in those increases over more than one election cycle. This would afford the opportunity to review an increase to see how it has affected an election and make any needed changes for subsequent elections.

Regarding the Commission's recommendations affecting Officeholder Accounts, I would urge the Commission to reconsider the increases that are being proposed. While there are restrictions on the ways Officeholder Accounts may be used, the funds are often used for "outreach" to constituents. While this is a necessary function that officeholders engage in, the Accounts nonetheless provide a substantial advantage to an incumbent officeholder over any potential challengers in subsequent elections. Therefore, if any increase is warranted, I would recommend it be no more than half the amounts being proposed. Incumbency already provides an uneven playing field. Please do not make it substantially worse by more than doubling the advantage that Officeholder Accounts provide.

I appreciate your consideration of my comments above.

Sincerely,  
  
Jay Beeber