
Item 8
Information

Quarterly Lobbying Summary

Executive Summary: This item presents a summary of activities reported to the Ethics Commission by lobbying entities for the fourth quarter of 2019.

Recommended Action: This item is for informational purposes only.

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Presenter: Tyler Joseph, Director of Policy

Lobbying Summary: 4th Quarter 2019

A. Introduction

The Municipal Lobbying Ordinance (MLO) regulates persons who receive compensation to lobby City officials. Los Angeles Municipal Code (LAMC) §§ 48.01, *et seq.* In LAMC § 48.01(B), the MLO makes several findings regarding lobbying activity, including the following:

1. Citizens have a right to know the identities of those who attempt to influence City decisions;
2. Public disclosure by lobbyists and their clients regarding their lobbying activities is essential to citizen confidence in the integrity of local government;
3. It is in the public interest to ensure that lobbyists do not misrepresent facts or their positions;
4. It is in the public interest to ensure that lobbyists do not place City officials under personal obligation to themselves or their clients.

To help ensure adequate and effective disclosure regarding efforts to lobby City government, lobbying entities are required to file quarterly disclosure reports. *See* LAMC §§ 48.01(B)(6), 48.08. This item summarizes information disclosed on the lobbying reports filed for the fourth quarter of 2019.

B. Legal Background

1. Definitions

The MLO defines lobbying activity generally as compensated conduct related to communications with City officials that are designed to influence municipal matters. LAMC § 48.02. The lobbying entities that are regulated by the MLO include lobbyists, lobbying firms, and lobbyist employers.

A lobbyist is an individual, regardless of title, who is compensated to spend 30 or more hours in a three-month period to engage in lobbying activities that include at least one direct communication with a City official or employee that is designed to influence a City matter on behalf of another person. *Id.* A lobbying firm is an entity that is entitled to receive \$1,000 in compensation for engaging in lobbying activities on behalf of another person during a three-month period, if a partner, owner, shareholder, or employee of the entity qualifies as a lobbyist. *Id.* A lobbying firm may be an individual lobbyist. Finally, a lobbyist employer is an entity that employs a lobbyist in-house to lobby on the entity's behalf. *Id.*

Certain persons are exempt from the lobbying regulations. These include individuals acting in an official government capacity, newspapers and other media outlets that publish editorials or paid advertising, persons whose only activity is bidding on a City contract, and 501(c)(3) organizations that receive government funding and are created to provide direct services to indigent persons. LAMC § 48.03.

2. Registration and Reporting

Lobbyists and lobbying firms are required to register with the Ethics Commission on an annual basis. LAMC §§ 48.07(A)-(B). Registration is required within 10 days after the end of the month in which the qualification threshold is met. LAMC § 48.07(A). The fees for each year's registration are \$450 per lobbyist plus \$75 for each client from whom the lobbyist is entitled to receive \$250 or more in a calendar quarter. LAMC § 48.07(C).

Each lobbying entity is required to file a disclosure report for every calendar quarter in which it qualifies as a lobbying entity. LAMC § 48.08(A)(1). Lobbying entities must continue to submit quarterly reports until registration is terminated, either voluntarily or automatically by virtue of the end of the calendar year. The disclosure reports must contain specific information, including the following:

- a. Each City agency that a lobbyist attempted to influence. LAMC §§ 48.08(B)(12), 48.08(C)(14).
- b. Each municipal matter that a lobbyist employer attempted to influence. LAMC § 48.08(D)(6).
- c. Total payments from clients to lobbying firms. LAMC § 48.08(C)(4).
- d. Total payments to lobbyists by lobbying firms and lobbyist employers. LAMC §§ 48.08(C)(7)(a), 48.08(D)(3).
- e. The elected City officials, candidates, and committees for which a lobbyist engaged in fundraising activity, as well as the dates of the activity and the amount of money raised. LAMC §§ 48.08(B)(7), 48.08(C)(9), 48.08(D)(10).
- f. Services provided by a lobbyist to a City candidate or ballot measure campaign or to the City under contract, including the amount of compensation received for those services. LAMC §§ 48.08(B)(10)-(11), 48.08(C)(12)-(13).

3. Prohibited Activities

Lobbying entities are prohibited from engaging in certain types of activity. They may not attempt to deceive City officials. LAMC §§ 48.04(B), (D). They may not place City officials under personal obligation to them. LAMC § 48.04(A). They may not create a municipal matter for the purpose of being retained to lobby on that matter. LAMC § 48.04(C).

Lobbyists and lobbying firms are also limited in certain financial activities. They may engage in fundraising, but they may not make campaign contributions to elected City officials, City candidates, or their committees if they are required to be registered to lobby the office the official or candidate holds or seeks. Los Angeles City Charter § 470(c)(11). And they may not make or act as an intermediary in the making of a gift to a City official. LAMC §§ 48.04(E), 49.5.8(A)-(C).

C. Fourth Quarter Compliance

In the fourth quarter of 2019, there were 503 registered lobbyists and 148 registered lobbying firms, including 57 sole proprietorships. In addition, there were 91 lobbyist employers.

These 742 lobbying entities were required to file 685 disclosure reports for the fourth quarter (the 57 sole-proprietor lobbyists were required to file a lobbying firm report but not a lobbyist report). A total of 675 reports (99 percent) were filed on time. Penalties totaling \$800 were assessed on reports filed past the January 31 deadline.

D. Top 10 Highest Paid Lobbying Firms

Lobbying firms are required to report the total amount of payments they receive each quarter from the clients they represent. A total of \$20,581,876 in payments from clients was reported by all lobbying firms for the fourth quarter of 2019.

The ten firms that reported the highest total payments from clients are identified in the table on the following eight pages. Each of the top ten firms reported receiving at least \$550,000 from clients in the fourth quarter. Together, the ten firms reported receiving a total of \$9,987,108, which represents 49 percent of all payments from clients reported by all lobbying firms for the fourth quarter of 2019.

TOP 10 HIGHEST PAID LOBBYING FIRMS			
<i>Based on Client Payments Reported as Received In 2019 Q4</i>			
Rank & Payments	Firms and Clients		
1. \$2,059,976	DLA Piper LLP (US)		
	1045 Olive LLC	Borstein Enterprises	Deep Green Housing & Community Development
	Altman Apartments LLC	Career Lofts - LA, LLC	Eelsey Partners
	Amplify Development Co.	Champion Real Estate Company	Fifteen Group
	Arc Capital Partners LLC	CorePoint Lodging Inc.	Forest City Residential West, Inc.
	Atlas Capital Group, LLC	CRE-HAR Crossroads SPV, LLC	Geneva Street Partners Company, LLC
	BARDAS Investment Group	Deep Green Housing & Community Development	Gerald W. - Vic Inn-Ternational
	Bastion Development Corporation		
	BlueGreen Preservation & Development, LLC		

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TRC Solutions, Inc.	National Strategies, LLC on behalf of nes, Inc.	RSE Capital Partners	TriCal Contruccion, Inc	Ness Holdings, Inc	Runyon Group	TRION PROPERTIES	Nike	Saltchuk Resources, Inc.		Ocean Development, Inc.	Seaview Investors, LLC	UCBA Trade Association	Official Police Garage Assn of LA	Seazen AHC 1375LLC	Unilev Capital	Olson Urban Housing LLC	Shaun T Jaenick LLC	Universal Standard Housing	One Concern, Inc.	Silver, Scott	Universal Technical Institute, Inc.	Onni Contracting (CA) Inc.	Silver Hill Properties LLC	Victoria SK Holdings, LLC	Organic Green Treatment Center, Inc.	Silver-Lake Arc LLC	Viewstone Capital	Oxford Capital Group LLC	Skinny Labs Inc., dba Spin Sklar-Kirsh	Viramontes, Enrique	Pan Am Equities	Slate Property Group	Viridium Grou	Park Lane Projects	Sonder USA, Inc	Waste Management Inc.	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TOP 10 HIGHEST PAID LOBBYING FIRMS

Based on Client Payments Reported as Received In 2019 Q4

Rank & Payments	Firms and Clients		
3. \$1,226,329	Armbruster Goldsmith & Delvac LLP		
	11601 Dunstan Partners, L.P.	Electric Pointe, LP Equity Office	OSIB LA Downtown Properties, LLC
	12001 Pico Property, LLC	Equity Residential	Pacific Storage
	2800 Casitas LLC	Faring Capital, LLC	Palatine Capital Partners
	4454 Van Nuys, LLC	FF Realty IV LLC	Management, LLC
	600 San Pedro LP	Frost/Chaddock	Palisades Capital
	6104 Hollywood, LLC	Developers, LLC	Partners
	6th & Alameda LLP	G.H. Palmer	PATH Ventures
	7006 Van Nuys, LLC	Glassell Park, LLC	Precision Development
	8008 Third Street Investments	Griffin Opportunities, LLC	Company
	Academy of Motion Picture Arts & Sciences	IMT Capital LLC	PSS West L.A., LLC
	ACC OP Development LLC	International Equity Partners	RAR2-Villa Marina Center CA, LLC
	AEG	Jade Enterprises	Regalian, LLC
	American Commercial Equities	Jamison Properties, LP	Related California
	Amoroso Company	Johnson Development	SeaZen-AHC 1375, LLC
	Aragon (Sunset/Everett) Properties Corp.	Karma Company, LLC	Sonder
	Artisan Realty Advisors	Knight Restaurant Group, Inc.	Spectrum Group Real Estate
	AutoNation	LA Hollywood Properties LLC	Spieker Realty Investments
	Bel Air Country Club	La Terra Development, LLC	Sunrise Senior Living
	Belmont Village Senior Living	Landmark Properties, Inc.	Sutter, Gary & Vera
	BLT Enterprises	LeFrak	The Buckley School
	Bolour	Lenmar Beverly Glen LLC	The Community Builders Group
	Brookfield Properties Development LLC/Forest City	Leon Capital Group	The Hanover Company
	BWC/St. Adnrews LP	Lincoln Property Company	The HQ Group
	Caladan Investments LLC	Lizard Capital LLC	The Mirman School
	California Landmark	LJ Properties, Inc.	The Pews at SC LLC
	Calvary Christian School	Lowe Enterprises Real Estate Group	The Richman Group
	Camden USA, Inc.	Marlborough School	California Development Company
	Campbell Hall School	MCRT Investments LLC	Tishman Speyer
	Chelsea Investment Corp.	Mercy Housing	Trammell Crow
	CIM Group	MGA North LLC	TriCal Construction
	City Market of Los Angeles	MLM Group LLC	TriStar Realty Group, LLC
	CoreSite	Next Century Associates, LLC	Uncommon Development
	Cypress Equity	North New Hampshire Partners, LLC	Universal Standard Housing
	Devenney Group, Ltd.	Oakmont Capital	University of Southern California
	District Square LLC	ONNI Group Contracting (California) Inc.	
	EAH Housing		

TOP 10 HIGHEST PAID LOBBYING FIRMS

Based on Client Payments Reported as Received In 2019 Q4

Rank & Payments	Firms and Clients		
	<p>Armbruster Goldsmith & Delvac LLP <i>(continued from previous page)</i></p> <p>Vantage Property Investors VisionQuest</p> <p>Welbrook Senior Living Westmark School Westwood3, LLC</p> <p>WH Hotel, LLC Wilshire Skyline, Inc. WNMS Properties, Inc.</p>		
4. \$829,665	<p>Craig Lawson & Co., LLC</p> <p>1200 S. Figueroa LLC 1614 Temple LLC 3800 West Sixth Street LLC A Community of Friends Abode Communities Acon Development AD Sharp US Amidi Group Augustson Family Trust B & F Associates Capital Foresight Carmel Partners Inc. Century Housing Chelsea Investment Corp. CIM Group Darden Corp. Decro Corporation Eiden Inc. Equity Residential Flexible PSH Solutions FN Property Investment Freeman Group Goodman North America Greenland US Holding Co. Grocery Outlet Inc. Harry's Auto Body Inc Highridge Costa Development Co. Holland Partners Hollywood Forever Inc. Hudson Pacific</p> <p>Ikar Ivy Station LLC Jacmar Partners Jade Enterprises Jamison California Market Center Jamison Properties LP Kaiser Foundation Health Plan Inc. Little Tokyo Service Center LW USC LLC Mercy Housing Meta Housing Mirae-LA, LLC Mitsui Fudosan America Museum Associates Music Box Building Co., LLC National Community Renaissance of CA National Real Estate Development LLC Nuveen Real Estate Palisades Capital Partners LLC Para Los Ninos, Inc. PariSel LLC Puente Learning Center R.D. Olson Development Red Hook Capital Partners</p> <p>Rexford Industrial Realty Rodeo Properties LLC Samko LLC Sandstone Properties Skid Row Housing Trust Snyder Family Trust SRO Housing Corp. Strategic Legacy Investment Group Temple Israel of Hollywood The City Market of Los Angeles The Hanover Company Topa Management Co. Triumph Management TTL Management Inc. Universal Villas LLC Urban Commons Value Schools Vermont Real Estate Properties LLC Wakeland Housing & Development Walter N Marks Inc Weingart Center West Hollywood Community Housing Corp. Wolf Rifkin Shapiro Schulman & Rabkin LLP Yavneh Hebrew Academy</p>		

TOP 10 HIGHEST PAID LOBBYING FIRMS

Based on Client Payments Reported as Received In 2019 Q4

Rank & Payments	Firms and Clients		
5. \$813,137	<p>Psomas</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>1330 Pico Blvd. Partners, LLC Art District Los Angeles Regional Center, LLC Beverly La Cienega, LLC BW America Development, LLC Canbri Properties, LLC Carmel Partners Casa Real Condominiums Colburn School Coree LLC Crown Group Holdings, PTY, Ltd. Cutting Edge Consultants</p> </div> <div style="width: 30%;"> <p>DTLA South Park Properties Propco I, LLC DTLA South Park Properties Propco II, LLC Granada Hills Partners, LLC Harridge Development Group, LLC Heart Olive, LLC Hermoyne Investments, Inc. L.A. Arena Land Company Miracle Mile Holdings, LLC Narrator, Inc.</p> </div> <div style="width: 30%;"> <p>NBCUniversal Media, LLC Neman Real Estate Investments LLC PH/T&T Master One LLC Rescore Koreatown, LLC Shenzhen New World Investments (USA), Inc. SOCAL San Pedro SPV1, LLC The Parlor HW, LLC Tribune Real Estate Holdings, LLC University of Southern California</p> </div> </div>		
6. \$775,787	<p>Latham & Watkins LLP</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>5601-5667 Santa Monica Blvd (LA) Owner LLC 5929 Sunset (Hollywood), LLC and CIM Group, LP Aerial Rapid Transit Technologies LLC Apartment Investments & Management Company ("AIMCO") Archer School for Girls Boething - Treeland Caruso Affiliated CH Palladium, LLC Clear Channel Outdoor CORE/Related Grand Ave JV, LLC Crescent Heights Dynamic Development Company, LLC Forest Lawn Memorial Park Assn Grit RE, LLC Healthy Spot LLC Heart Olive, LLC</p> </div> <div style="width: 30%;"> <p>Honeywell International, Inc. Hudson Pacific Properties, Inc. J. Paul Getty Trust JMB Realty Corporation (AKA: AP Properties) Karney Properties Co. Kayne Anderson Real Estate Advisors KIPP SoCal Public Schools LAFC Sports, LLC Los Angeles Dodgers LLC Loyola Marymount University Majestic Realty Co. McCourt Partners LLC Mitsui Fudosan America, Inc. Nant Media Holdings, LLC NBCUniversal Media, LLC Pacific Maritime Association Paramount Studios Phase IIC Owner, LLC</p> </div> <div style="width: 30%;"> <p>Phase III Owner, LLC Providence Tarzana Medical Center SBLP Development LLC Sierra Canyon High School Foundation SM 10000 Property, LLC The AllBright Group LA LLC The Buckley School The Charles Company and M. & A. Gabae, LP The Charles Company, M. & A. Gabae, LP, Metropolitan Square, Inc. and District Square, LLC Tribune Media Company University of Southern California Vella Group/VE Equities LLC Westfield, LLC Wilshire Gayley, LLC</p> </div> </div>		

TOP 10 HIGHEST PAID LOBBYING FIRMS

Based on Client Payments Reported as Received In 2019 Q4

Rank & Payments	Firms and Clients		
7. \$728,874	<p>Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;">544 Pacific Investment, LLC</div> <div style="width: 33%;">Expo Line Owner, LLC</div> <div style="width: 33%;">NSB/Richlar Partnership</div> <div style="width: 33%;">6161 Mulholland Hwy LLC</div> <div style="width: 33%;">Fidelity National Title Insurance Company</div> <div style="width: 33%;">Park View Management Group Inc.</div> <div style="width: 33%;">685 Westminster Holdings LLC</div> <div style="width: 33%;">Fogel Real Estate</div> <div style="width: 33%;">Groening, Deborah</div> <div style="width: 33%;">Peter & Sarah Mandell</div> <div style="width: 33%;">963 South Wilton Investors</div> <div style="width: 33%;">Hospitality Group, LLC</div> <div style="width: 33%;">Schwartz, Steve</div> <div style="width: 33%;">Affinity House Inc.</div> <div style="width: 33%;">Huntington Point Partners, LLC</div> <div style="width: 33%;">Shapiro, Joel and Lori</div> <div style="width: 33%;">Balios Capital LLC</div> <div style="width: 33%;">IKE Smart City</div> <div style="width: 33%;">Tezuke LLC</div> <div style="width: 33%;">BBC Van Ness, LLC</div> <div style="width: 33%;">Kermath, Karen</div> <div style="width: 33%;">Thatcher Yard Housing LLC</div> <div style="width: 33%;">BLDG Partners LLC</div> <div style="width: 33%;">Levy, Allen</div> <div style="width: 33%;">The Brine, LLC</div> <div style="width: 33%;">Carmel Partners</div> <div style="width: 33%;">LINC Housing Corporation</div> <div style="width: 33%;">The Palmline Trust</div> <div style="width: 33%;">Chen, Kevin</div> <div style="width: 33%;">Lion Boylston, LLC</div> <div style="width: 33%;">The Taubman Company</div> <div style="width: 33%;">Dart Partners/Mateo Arts LLC</div> <div style="width: 33%;">Los Angeles Dodgers</div> <div style="width: 33%;">University of Southern California</div> <div style="width: 33%;">Decro Corporation</div> <div style="width: 33%;">Marina Pacific Hotel and Suites, Inc.</div> <div style="width: 33%;">Vista Investment Group</div> <div style="width: 33%;">Dragonlaine Holdings, LLC</div> <div style="width: 33%;">Merlone Geier Partners</div> <div style="width: 33%;">Watts Station LP</div> <div style="width: 33%;">Enwave Energy Corporation</div> <div style="width: 33%;">NoHo 5050 LP</div> <div style="width: 33%;">Wynkoop Properties, LLC</div> <div style="width: 33%;">Corporation</div> <div style="width: 33%;">North Main LLC</div> </div>		
8. \$698,750	<p>Michael Bai and Associates</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;">Alameda Industrial Medical Group</div> <div style="width: 33%;">Ha, Kee Whan</div> <div style="width: 33%;">Los Angeles Equestrian Center</div> <div style="width: 33%;">Atlas Capital Group</div> <div style="width: 33%;">Holland & Knight</div> <div style="width: 33%;">Public Storage Sabah, Dan</div> <div style="width: 33%;">Bando Dela Corp.</div> <div style="width: 33%;">Jamison Services, Inc.</div> <div style="width: 33%;">Samitaur Constructs</div> <div style="width: 33%;">Capri Urban Baldwin LLC</div> <div style="width: 33%;">Jia Long Real Estate Development</div> <div style="width: 33%;">Sea Urchin Lounge LLC</div> <div style="width: 33%;">Choi, Lana</div> <div style="width: 33%;">Kim, Young</div> <div style="width: 33%;">SM Entertainment LA</div> <div style="width: 33%;">Clear Channel</div> <div style="width: 33%;">LA Gateway, LLC</div> <div style="width: 33%;">Sushi Nozawa Group</div> <div style="width: 33%;">CTI Housing</div> <div style="width: 33%;">Lincoln Property Co. West</div> <div style="width: 33%;">Walter J. Company</div> </div>		
9. \$602,175	<p>Sheppard, Mullin, Richter & Hampton LLP</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;">1 and 8, Inc.</div> <div style="width: 33%;">Hollywood Forever Cemetery</div> <div style="width: 33%;">Montgomery Clark Advisors</div> <div style="width: 33%;">1600 Hudson, LLC</div> <div style="width: 33%;">Hollywood International Regional Center</div> <div style="width: 33%;">Our Lady of Mt. Lebanon</div> <div style="width: 33%;">9712 Oak Pass Road LLC</div> <div style="width: 33%;">Hudson Pacific Properties, Inc.</div> <div style="width: 33%;">Peebles Corporation, The</div> <div style="width: 33%;">Automobile Club of Southern California</div> <div style="width: 33%;">Ike Smart City LLC</div> <div style="width: 33%;">Pluto Partners, LLC</div> <div style="width: 33%;">Azure Development, Inc.</div> <div style="width: 33%;">James Samatas</div> <div style="width: 33%;">Primestor Development, Inc.</div> <div style="width: 33%;">BLDG Edinburg LLC</div> <div style="width: 33%;">Lightstone DTLA, LLC</div> <div style="width: 33%;">Sandstone Properties</div> <div style="width: 33%;">California Hotel & Lodging Association</div> <div style="width: 33%;">LLJ Adler Warner</div> <div style="width: 33%;">TA Los Angeles 443 SSS LP</div> <div style="width: 33%;">Elkwood LLC</div> <div style="width: 33%;">Luxe Hotels</div> <div style="width: 33%;">The True Life Companies</div> <div style="width: 33%;">Equitas Academy</div> <div style="width: 33%;">MAK Center</div> <div style="width: 33%;">Valley Charter - 18600</div> <div style="width: 33%;">Geoula, Joe</div> <div style="width: 33%;">McCadden Plaza, LP</div> <div style="width: 33%;">Lanark</div> <div style="width: 33%;">Holland Partner Group</div> <div style="width: 33%;">MOB Hotels & Compagnie LLC</div> <div style="width: 33%;">Venus Over Manhattan</div> </div>		

TOP 10 HIGHEST PAID LOBBYING FIRMS			
<i>Based on Client Payments Reported as Received In 2019 Q4</i>			
Rank & Payments	Firms and Clients		
10. \$551,500	M Strategic Communications		
	Aecom capital	firefly systems inc.	Pacific Maritime
	Airbnb	HNTB corporation	Association plains
	Atlas / college station	Hudson pacific properties	marketing, l.p.
	CA Resources Corporation	Jade Enterprises, LLC	Relevant group
	Californians for Energy	Juul labs, inc	SA recycling llc
	Independence	lafc sports, llc	Tishman Speyer
	Cohen Goldsein	Lincoln Property Company	University of Southern
	Investment (sgi)	West LLC	California
	Strategies	Los Angeles Dodgers	Vella Group
	Dart container corporation		Verizon
			Westfield Promenade

E. Top 10 Highest Paying Clients

In the fourth quarter of 2019, there were 2,200 registered clients of lobbying entities. Lobbying firms are required to disclose the payments they receive from their clients and the City matters associated with those payments. The clients that lobbying firms reported as having paid the most for lobbying services in the fourth quarter are identified in the table that begins below. Payments from clients with similar names and projects are aggregated.

Each of the top ten highest paying clients spent at least \$157,000 during the quarter. Combined, their payments totaled \$2,924,609, or 14.2 percent of the \$20,634,626 total reported payments from clients.

TOP 10 HIGHEST PAYING CLIENTS					
<i>Based on Aggregate Client Payments Reported for 2019 Q4</i>					
Detail of Total Payments					
Client	Total Payments Reported	Lobbying Firm	Payment	City Matter	Agencies Lobbied
1. Champion Real Estate Company	\$518,947	DLA Piper LLP (US)	\$252,452	General Real Estate	City Attorney, City Council, Building and Safety, LAFD, HCID, Planning
			\$234,613	Yucca Argyle	City Attorney, City Council, Building and Safety, Planning
			\$30,916	1501 Sunset	City Council, Neighborhood Councils, Planning, LAPD
		Elkins Kalt Weintraub Reuben Gartside LLP	\$966	Development matters	City Council

TOP 10 HIGHEST PAYING CLIENTS

Based on Aggregate Client Payments Reported for 2019 Q4

Detail of Total Payments

Client	Total Payments Reported	Lobbying Firm	Payment	City Matter	Agencies Lobbied
2. Clear Channel Outdoor, LLC (and Clear Channel Outdoor, Clear Channel Outdoor, Inc., and Clear Channel)	\$438,374	Latham & Watkins LLP	\$147,561	Assist client in connection with outdoor advertising issues.	No City agencies lobbied.
		Mercury Public Affairs	\$95,000	Issue related to digital boards	Mayor, City Council
		Kirra, LLC	\$45,000	Outdoor Advertising	Mayor, City Council, Planning
		Michael Bai and Associates	\$45,000	Billboard Issue	City Council
		Afriat Consulting Group Inc	\$41,785	Assist with securing permits and other issues regarding outdoor advertising/Various locations	Mayor, Controller, City Council, Planning
		Urban Solutions, LLC	\$40,028	Digital Signage	City Council
		David Gershwin Consulting	\$24,000	Outdoor Advertising Issues/City of Los Angeles (File 11-1705)	City Council, Neighborhood Councils
3. SOCAL San Pedro SPV1, LLC	\$435,750	Psomas	\$435,750	Support for processing of a Final Map/26900 & 27812 S. Western Ave., San Pedro, CA	Building and Safety, Planning, Public Works, Engineering, LADOT
4. CRE-HAR Crossroads SPV, LLC	\$296,501	DLA Piper LLP (US)	\$296,501	Crossroads. Development of a 7 plus acre site with 8 new buildings including hotel, retail, residential and office uses. (CPC-2015-2025-ZC-HD-MCUP-CU-ZV-SPR)	City Attorney, City Council, Building and Safety, HCID, Planning
5. CIM Group (and 5929 Sunset (Hollywood), LLC and CIM Group, LP)	\$268,840	Latham & Watkins LLP	\$141,178	Land Use & Transportation Matters re: Sunset and Gordon Mixed-Use Project/5929-5945 W. Sunset Boulevard	No City agencies lobbied.
		Gonzales Law Group, APC	\$15,628	2231 Western	City Council, Planning
			\$14,731	926 Sycamore /926 Sycamore Avenue	City Council, Planning
			\$12,876	5103 Adams	City Council, Planning
			\$8,382	5211 W Adams CUP	City Council, Planning
			\$3,009	5170 Adams Hotel	City Council, Planning
			\$2,768	4327 Adams CUP	City Council, Planning
			\$2,073	Western Hotel /2137-2211 S Western Avenue	City Council, Planning
\$1,551	4750 Wilshire	City Council, Planning			

TOP 10 HIGHEST PAYING CLIENTS

Based on Aggregate Client Payments Reported for 2019 Q4

Detail of Total Payments

Client	Total Payments Reported	Lobbying Firm	Payment	City Matter	Agencies Lobbied		
CIM Group (and 5929 Sunset (Hollywood), LLC and CIM Group, LP) (continued)			\$1,262	Crenshaw	City Council, Planning		
			\$1,150	5560 Adams CUP/5560-5562 West Adams Boulevard	City Council, Planning		
			\$695	5135 Adams CUP	City Council, Planning		
			\$417	1009 Orange	City Council, Planning		
			\$144	953 Sycamore	City Council, Planning		
		Englander Knabe and Allen (including threeSixty)			\$18,720	Development/5929 Sunset Blvd., Los Angeles, CA 90028	Planning
					\$9,669	Development/5953 West Adams Boulevard, Los Angeles, CA 90016	Planning
					\$6,755	Development/5410 W. Adams, Los Angeles, CA 90016	Planning
					\$6,376	Development/5400 W. Adams Blvd., Los Angeles, CA 90016	Planning
					\$2,644	Buerge II	Planning
					\$411	Development/5263 W. Adams Blvd., Los Angeles, CA 90016	Planning
					\$117	Development/4921 W. Adams, Los Angeles, CA	Planning
		Afriat Consulting Group Inc			\$14,651	Assist client with re-entitlement issues/5929 Sunset Blvd.	No City agencies lobbied.
					\$3,633	Farmers Insurance Campus/Farmers Insurance Campus	No City agencies lobbied.
6. Watermark Westwood Village LLC	\$241,420	DLA Piper LLP (US)	\$241,420	Westwood	City Attorney Council, LAFD, HCID, Planning, DWP		
7. Mountaingate Open Space Maintenance Association	\$225,513	Loeb & Loeb LLP	\$213,362	1901 N. Sepulveda Blvd. & 1901 W. Sepulveda Blvd.	City Council, Building and Safety, Planning		
			\$12,151	CUP Enforcement/12445 Mountaingate Drive	City Council, Building and Safety, Planning		
8. La Terra Development LLC	\$182,620	Englander Knabe and Allen (including threeSixty)	\$41,900	Pinnacle 360 Hoover LLC/235 N. Hoover Street, Los Angeles, CA	No City agencies lobbied.		
			\$30,000	Venice Collection/12444, 12575, 12579 Venice Blvd	No City agencies lobbied.		

TOP 10 HIGHEST PAYING CLIENTS

Based on Aggregate Client Payments Reported for 2019 Q4

Detail of Total Payments

Client	Total Payments Reported	Lobbying Firm	Payment	City Matter	Agencies Lobbied		
La Terra Development LLC (continued)			\$28,400	Development / Encore Silverlake Investments/2753 Waverly Drive, Los Angeles	No City agencies lobbied.		
			\$26,200	Development / 4900 Hollywood Blvd.	No City agencies lobbied.		
			\$14,700	Development/4850 Hollywood Blvd.	No City agencies lobbied.		
			\$13,200	12575 Venice Blvd., Los Angeles, CA 90066	No City agencies lobbied.		
			\$13,100	1350 Deluxe Hollywood Investors, LLC/1350 N. Western Ave., Los Angeles, CA	No City agencies lobbied.		
			\$400	Development/1100 West Temple	No City agencies lobbied.		
		Armbruster Goldsmith & Delvac LLP			\$5,618	235 Hoover/235 Hoover	No City agencies lobbied.
					\$3,862	4900 Hollywood/4900 Hollywood	City Council, Planning
					\$1,909	4850 Hollywood/4850 Hollywood	Planning
					\$1,381	12440 Venice/12440 Venice	Planning
					\$1,381	12575 Venice/12575 Venice	No City agencies lobbied.
					\$569	1350 Western/1350 Western	Planning
9. Atlas Capital Group, LLC	\$159,644	DLA Piper LLP (US)	\$88,504	Alameda Square/777 Alameda St	City Attorney, Building and Safety, Planning, LADOT		
			\$41,140	Chinatown/120-129 W. College Street	City Attorney, Building and Safety, Planning		
		Michael Bai	\$30,000	Downtown Los Angeles ROW Project	No City agencies lobbied.		
10. Los Angeles Dodgers	\$157,000	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	\$147,000	Centerfield Improvements Project Entitlements Appeal	City Council, Planning		
		M Strategic Communications	\$10,000	Proposed aerial transportation from Union Station to Dodger Stadium and roadway improvements.	Mayor, City Council, Planning, Public Works		

F. Fundraising

Lobbying entities are required to disclose the fundraising they engage in on behalf of elected City officials, candidates, and committees. Of the 742 fourth-quarter lobbying entities, 19 (2.6 percent) reported fundraising activity totaling \$145,200.

A breakdown of the fourth-quarter fundraising activity, as reported by eleven lobbyists and eight lobbying firms is provided in the following table. Entities that reported identical amounts for the same candidate or officeholder may have served as co-hosts for the same fundraising event.

FUNDRAISING 2019 Q4			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
1. \$16,000	Gathers Strategies Inc.	Firm	Councilmember O'Farrell Officeholder Account 2013 \$16,000
2. \$15,950	Veronica Perez & Associates	Firm	Joe Buscaino for City Council, 2011, Officeholder \$7,700 Councilmember O'Farrell Officeholder Account 2013 \$6,100 Councilmember Curren Price Officeholder Account \$1,350 Harris-Dawson for City Council 2020 \$800
3. \$15,650	Englander Knabe and Allen	Firm	Councilmember O'Farrell Officeholder Account 2013 \$5,300 Joe Buscaino for City Council, 2011, Officeholder \$5,300 Councilmember Curren Price Officeholder Account \$2,400 John Lee for City Council 2020-Primary \$1,850 Kevin de Leon for City Council 2020 \$800
4. \$13,800	Courtney Chesla Torres	Firm*	Joe Buscaino for City Council, 2011, Officeholder \$7,700 Councilmember O'Farrell Officeholder Account 2013 \$6,100
5. \$13,800	Kindel Gagan	Firm	Joe Buscaino for City Council, 2011, Officeholder \$7,700 Councilmember O'Farrell Officeholder Account 2013 \$6,100
6. \$10,000	Edgar Khalatian	Lobbyist	Nury Martinez for City Council 2020 \$10,000
7. \$10,000	Mayer Brown LLP	Firm	Nury Martinez for City Council 2020 \$10,000
8. \$10,000	Philip R. Recht	Lobbyist	Nury Martinez for City Council 2020 \$10,000
9. \$9,500	Howard Sunkin	Lobbyist	Nury Martinez for City Council 2020 \$9,500
10. \$8,250	Jeffrey S. McConnell	Lobbyist	Councilmember O'Farrell Officeholder Account 2013 \$2,400 John Lee for City Council 2020-Primary \$1,850 Councilmember Curren Price Officeholder Account \$1,600 Joe Buscaino for City Council, 2011, Officeholder \$1,600 Kevin de Leon for City Council 2020 \$800
11. \$6,250	Ronald M. Stone	Lobbyist	Nury Martinez for City Council 2020 \$6,250
12. \$4,100	Afriat Consulting Group Inc	Firm	Nury Martinez for City Council 2020 \$4,100
13. \$3,200	Marcus A. Allen	Lobbyist	Joe Buscaino for City Council, 2011, Officeholder \$1,600 Councilmember Curren Price Officeholder Account \$800 Councilmember O'Farrell Officeholder Account 2013 \$800
14. \$2,400	TChoi and Associates	Firm*	Councilmember O'Farrell Officeholder Account 2013 \$1,600 Kevin de Leon for City Council 2020 \$800

FUNDRAISING 2019 Q4			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
15. \$2,100	Eric W. Rose	Lobbyist	Joe Buscaino for City Council, 2011, Officeholder \$1,300 Councilmember O'Farrell Officeholder Account 2013 \$800
16. \$1,300	David Herbst	Lobbyist	Monica Garcia for City Council 2020 \$800 Harris-Dawson for City Council 2020 \$500
17. \$1,300	Dana Sayles	Lobbyist	Councilmember O'Farrell Officeholder Account 2013 \$1,300
18. \$800	Alex Cherin	Lobbyist	Joe Buscaino for City Council, 2011, Officeholder \$800
19. \$800	Kate Hennigan	Lobbyist	John Lee for City Council 2020-Primary \$800

*Sole proprietor

G. Contributions

Lobbying entities must report on a quarterly basis the contributions they make or deliver or for which they act as intermediaries.

A lobbying entity delivers a contribution for another person when the lobbying entity causes the contribution to be mailed or physically conveyed to the recipient. A lobbying entity is an intermediary for a contribution when the lobbying entity makes the contribution, itself, on behalf of another party who then reimburses the lobbying entity. The identity of a person for whom a lobbying entity acts as an intermediary must be disclosed.

Certain contributions are prohibited. Lobbyists and lobbying firms may not make contributions to elected City officials, City candidates, or their City-controlled committees if they are required to be registered to lobby the City office the official or candidate holds or seeks. This ban does not extend to lobbyist employers.

In the fourth quarter, six lobbyist employers, and one firm, reported making a combined \$33,700 in contributions, detailed in the next table.

MADE CONTRIBUTIONS 2019 Q4			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
1. \$12,900	California Resources Corporation	Employer	Mark Ridley-Thomas Committee for a Better L.A. \$6,500 Councilmember Cedillo Officeholder Account 2013 \$800 Councilmember Curren Price Officeholder Account \$800 Councilmember Monica Rodriguez 2017 - Officeholder Account \$800 Joe Buscaino for City Council, 2011, Officeholder \$800 John Lee for City Council 2020-Primary \$800 Nury Martinez for City Council 2013 Officeholder Account \$800 Nury Martinez for City Council 2020 \$800 Wesson Officeholder Account \$800

MADE CONTRIBUTIONS 2019 Q4				
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients	
2. \$8,200	Southwest Regional Council of Carpenters	Employer	Marqueece Harris-Dawson L.A Freedom Fund David Ryu for City Council 2020 John Lee for City Council 2020-Primary Mark Ridley-Thomas for City Council 2020 Paul Krekorian for City Council 2020	\$5,000 \$800 \$800 \$800 \$800
3. \$7,100	Laborers Local 300	Employer	Mike Feuer City Attorney Officeholder Account 2013 Councilmember Cedillo Officeholder Account 2013 Councilmember O'Farrell Officeholder Account 2013 David Ryu for City Council 2015 Officeholder Friends of Eric Garcetti Officeholder Joe Buscaino for City Council 2011 John Lee for City Council 2019 John Lee for City Council 2020-Primary	\$1,500 \$800 \$800 \$800 \$800 \$800 \$800 \$800
4. \$2,400	BNSF Railway Company	Employer	Councilmember Curren Price Officeholder Account Councilmember O'Farrell Officeholder Account 2013 John Lee for City Council 2020-Primary Mark Ridley-Thomas for City Council 2020	\$800 \$800 \$800 (\$800)**
5. \$2,300	Apartment Association of Greater L.A.	Employer	Controller Ron Galperin Officeholder Account 2013 John Lee for City Council 2020-Primary	\$1,500 \$800
6. \$800	Uber Technologies, Inc.	Employer	Nury Martinez for City Council 2020	\$800
7. (\$280)**	Glaser, Weil, Fink, Howard, Avchen & Shapiro, LLP	Firm	Sarah Kate Levy for City Council 2020	(\$280)**

*Sole proprietor

**Contribution returned

Also during the reporting period, eight lobbying firms, one lobbyist employer, and four lobbyists reported delivering \$65,650 in contributions to the committees of 12 City officeholders and two City Council candidates. More detail is provided in the table on the next two pages.

DELIVERED CONTRIBUTIONS 2019 Q4				
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients	
1. \$14,850	Kindel Gagan	Firm	Joe Buscaino for City Council, 2011, Officeholder John Lee for City Council 2020-Primary Councilmember O'Farrell Officeholder Account 2013 Harris-Dawson for City Council 2020 Paul Krekorian for City Council 2020 Councilmember Curren Price Officeholder Account David Ryu for City Council 2020 Nury Martinez for City Council 2020 Wesson for Supervisor 2020	\$2,900 \$2,900 \$2,100 \$2,000 \$1,600 \$1,000 \$800 \$800 \$750

DELIVERED CONTRIBUTIONS 2019 Q4

Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
2. \$11,200	Arnie Berghoff & Associates	Firm	<i>Councilmember O'Farrell Officeholder Account 2013</i> \$3,200 <i>Joe Buscaino for City Council, 2011, Officeholder</i> \$2,400 <i>Nury Martinez for City Council 2020</i> \$2,400 <i>Councilmember Curren Price Officeholder Account</i> \$1,600 <i>Harris-Dawson for City Council 2020</i> \$800 <i>John Lee for City Council 2020-Primary</i> \$800
3. \$11,100	Airbnb, Inc.	Employer	<i>Mark Ridley-Thomas Committee for a Better L.A</i> \$2,500 <i>Friends of Eric Garcetti Officeholder</i> \$1,400 <i>Councilmember Cedillo Officeholder Account 2013</i> \$800 <i>Councilmember Curren Price Officeholder Account</i> \$800 <i>Councilmember Monica Rodriguez 2017 - Officeholder Account</i> \$800 <i>Harris-Dawson for City Council 2020</i> \$800 <i>John Lee for City Council 2019</i> \$800 <i>Kevin de Leon for City Council 2020</i> \$800 <i>Mark Ridley-Thomas for City Council 2020</i> \$800 <i>Nury Martinez for City Council 2020</i> \$800 <i>Paul Krekorian for City Council 2020</i> \$800
4. \$8,250	Englander Knabe and Allen	Firm	<i>Councilmember O'Farrell Officeholder Account 2013</i> \$3,200 <i>Joe Buscaino for City Council, 2011, Officeholder</i> \$3,200 <i>Councilmember Curren Price Officeholder Account</i> \$1,600 <i>John Lee for City Council 2020-Primary</i> \$250
5. \$5,600	Afriat Consulting Group Inc	Firm	<i>Nury Martinez for City Council 2020</i> \$4,000 <i>Councilmember Curren Price Officeholder Account</i> \$800 <i>Kevin de Leon for City Council 2020</i> \$800
6. \$4,250	Jeffrey S. McConnell	Lobbyist	<i>Councilmember O'Farrell Officeholder Account 2013</i> \$1,600 <i>Joe Buscaino for City Council, 2011, Officeholder</i> \$1,600 <i>Councilmember Curren Price Officeholder Account</i> \$800 <i>John Lee for City Council 2020-Primary</i> \$250
7. \$2,400	Marcus A. Allen	Lobbyist	<i>Councilmember Curren Price Officeholder Account</i> \$800 <i>Councilmember O'Farrell Officeholder Account 2013</i> \$800 <i>Joe Buscaino for City Council, 2011, Officeholder</i> \$800
8. \$1,600	Building Industry Association - Los Angeles/Ventura Chapter	Firm	<i>John Lee for City Council 2020-Primary</i> \$800 <i>Nury Martinez for City Council 2020</i> \$800
9. \$1,600	Morrie Goldman	Lobbyist	<i>John Lee for City Council 2020-Primary</i> \$1,600
10. \$1,600	Eric Rose	Lobbyist	<i>Councilmember O'Farrell Officeholder Account 2013</i> \$800 <i>Joe Buscaino for City Council, 2011, Officeholder</i> \$800

DELIVERED CONTRIBUTIONS 2019 Q4			
Rank & Total Raised	Name of Lobbying Entity	Type of Entity	Recipients
11. \$1,600	Urban Solutions, LLC	Firm	<i>John Lee for City Council 2020-Primary</i> \$1,600
12. \$800	Central City Association of Los Angeles	Firm	<i>John Lee for City Council 2020-Primary</i> \$800
13. \$800	colLABorate	Firm	<i>John Lee for City Council 2020-Primary</i> \$800

H. Activity Expenses

Lobbying entities are required to report the payments they make to benefit City officials and their immediate family members. LAMC §§ 48.08(B)(4)–(5), 48.08(C)(5)–(6), 48.08(D)(7)–(8). Activity expenses include gifts and must be itemized if they are valued at \$25 or more. *Id.*; LAMC § 48.02.

Just as lobbyists and lobbying firms cannot make certain campaign contributions, they also cannot make gifts to City officials. Gifts from lobbyist employers are not prohibited, but they may not exceed \$100 per City official per year. As noted in the following table, four lobbyist employers reported itemized activity expenses totaling \$971 in the fourth quarter of 2019.

ACTIVITY EXPENSES 2019 Q4					
Total	Lobbying Entity	Type of Entity	Recipient	Description	Value
\$525	University of Southern California	Employer	Curren Price Councilmember	Attended USC vs. Oregon Football Game	\$99
			Andrea Greene <i>Director of Community Programs,</i> Office of Councilman Curren Price	Attended President's Community Holiday Party	\$71
			Yeghig Keshishian <i>Chief External Affairs Officer,</i> Los Angeles Department of City Planning	Attended President's Community Holiday Party	\$71
			Aura Garcia <i>Commissioner</i> Los Angeles Board of Public Works	Attended President's Community Holiday Party	\$71
			Charise Henry <i>HIRE LA'S YOUTH Manager</i> Economic and Workforce Development	Attended President's Community Holiday Party	\$71
			Eric Gurna <i>President and Chief Executive Officer</i> LA's BEST Afterschool Enrichment Program	Attended President's Community Holiday Party	\$71
			Bryce Rosauo <i>Budget Deputy</i> Office of Councilman Curren Price	Attended President's Community Holiday Party	\$71

ACTIVITY EXPENSES 2019 Q4					
Total	Lobbying Entity	Type of Entity	Recipient	Description	Value
\$300	Building Industry Association - Los Angeles/Ventura Chapter	Employer	Osama Younan <i>Division Chief</i> LADBS	BIA Awards Gala	\$75
			Steve Bullum <i>Power Engineering New Business Manager</i> LADWP	BIA Awards Gala	\$75
			Marco Maldonado <i>Tract & Mobile Home Design Engineer</i> LADWP	BIA Awards Gala	\$75
			Brian Lynch <i>Developer Liaison</i> LADWP	BIA Awards Gala	\$75
\$100	Apartment Association of Greater L.A.	Employer	Silvia Viramontes <i>Project Assistant</i> Lead Hazard Remediation Program	Meal and Beverages	\$100
\$46	Microsoft Corporation	Employer	Ted Ross <i>General Manager/CIO</i> Information Technology Agency	Event Ticket & Book	\$46

I. Major Filers

A major filer is a person who makes or incurs expenses totaling \$5,000 or more in a calendar quarter to influence one or more City matters but does not directly communicate with a City decision maker. Lobbyists, lobbying firms, and lobbyist employers are not major filers, and the payments and expenses they report do not count toward the threshold. However, a lobbying client can qualify as a major filer. LAMC § 48.02.

Major filers must file a disclosure report for every quarter in which they meet the \$5,000 threshold. Among other things, they must report the money spent on public or media relations, advertising, public outreach, research, reports, and similar activities. LAMC § 48.08(E).

For the fourth quarter of 2019, five entities reported \$219,222 in major filer activity and are identified in the next table.

Major Filer Activity 2019 Q4			
Filer	City Matter	City Reference Number	Total Expenditures
Altria Client Services	Flavored Tobacco Products Sale Restriction	CF-18-1104	\$73,183
Ad Zero	Sign Ordinance Revisions	CF 11-1705	\$56,545
Expedia Group	Vacation rentals in non-primary homes/ordinances	CF 18-1246	\$39,544
Californians for Energy Independence	Petroleum Administrator's recommended setback requirements	none given	\$39,358
Center for Biological Diversity	Oil and gas zoning code proposed changes	CF 17-0047	\$10,592

J. Public Access

This and other quarterly summaries are available on the Ethics Commission's web site. Detailed information about lobbying entities and their clients is also available. Registration statements and quarterly reports may be viewed online, and specific information may be searched through the Public Data Portal.