



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

Correspondence Received

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
62.		Favor	Fatima Malik	The League of Women Voters of Los Angeles County supports Item 62. Please see the attached letter for our full comments and recommendations.
			Sean McMorris	
		Item Total	2	
Grand Total			2	



An Inter-League organization: • Beach Cities • Long Beach Area • Greater Los Angeles • Mt. Baldy Area • Palos Verdes Peninsula/San Pedro • Pasadena Area • Santa Monica • Torrance Area • Whittier

July 20, 2026

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012

Re: Item 62 – County of Los Angeles Ethics Commission Charter Amendment

Dear Chair and Honorable Members of the Board,

The League of Women Voters of Los Angeles County supports the July 7, 2026, motion by Supervisors Holly J. Mitchell and Lindsey P. Horvath directing County Counsel to include language in the pending Charter amendment that preserves the voter-approved Measure J commitment under the governance structure created by Measure G.

Los Angeles County voters approved Measure J in 2020 to establish a minimum investment in direct community investment and alternatives to incarceration. Because of administrative errors, voters were not informed that Measure G could result in the repeal of Measure J when the County's new governance structure takes effect. The County has a responsibility to correct that error and protect the intent expressed by voters.

We specifically support language that:

- Continues the Measure J commitment without interruption.
- Makes both the Board of Supervisors and the future County Executive responsible for compliance.
- Prevents the County Executive from vetoing the Measure J allocation.

We also urge the County to preserve transparent public reporting, independent oversight, meaningful community participation, and evaluation of funded programs.

These protections are consistent with League positions supporting accountable and responsive county government, a strong role for the Board of Supervisors in establishing budget priorities, meaningful public participation, and effective oversight of public funds. They are also consistent with our positions supporting mental health services, housing stability, youth development, rehabilitation, reentry, and alternatives to incarceration.

The practical importance of Measure J is reflected in current Care First Community Investment programs supporting rental assistance, workforce development, community-based health and mental health services, youth programs, small-business assistance, and noncustodial diversion and reentry services.

The League is concerned that the proposed Charter amendment combines two substantial public policy questions in a single ballot measure. Voters should be able to evaluate the Ethics Commission and the preservation of Measure J independently. We therefore urge the Board to present these provisions as separate ballot questions.

We are also concerned that the proposed ballot title and question refer only to “community investment and alternatives to incarceration” without identifying Measure J by name or explaining that the amendment is intended to prevent Measure G’s potential repeal of the voter-approved measure. Whether the provisions are separated or remain combined, the ballot title, question, and impartial analysis should clearly identify Measure J, explain why corrective action is necessary, and state the effect of both a yes vote and a no vote. The currently proposed ballot wording combines the Ethics Commission and community investment provisions in one question without naming Measure J.

We urge the Board to preserve Measure J, present the Ethics Commission and Measure J provisions to voters separately, and ensure that all ballot materials clearly and accurately explain the County’s proposed corrective action.

Sincerely,

Respectfully,



Margo A. Reeg, President
League of Women Voters of Los Angeles County

Cc: Fatima Malik, Vice President, Action and Advocacy Chair, League of Women Voters of Los Angeles County

July 18, 2026

Los Angeles County Board of Supervisors
Kenneth Hanh Hall of Administration
500 West Temple Street
Los Angeles, CA 90012



Re: County of Los Angeles Ethics Commission Charter Amendment (Agenda Item #62)

Dear Chair Solis and Honorable Supervisors:

California Common Cause appreciates the tremendous work that the Government Reform Task Force (GRTF), Board of Supervisors, and County Counsel have done to develop the proposed charter language establishing the Los Angeles County Ethics Commission.¹ Overall, we believe the proposed charter amendment creates a strong framework for an independent ethics commission by providing meaningful investigative and enforcement authority, establishing an independent Office of Ethics Compliance, granting rulemaking authority, and providing important budget protections. These provisions will help promote transparency, accountability, and public trust in County government.

While we strongly support the proposed Charter Amendment and its overall direction, we respectfully recommend several targeted amendments, in addition to those proposed by the Governance Reform Task Force, which we also support,² to further strengthen the Commission's independence and reduce potential legal vulnerabilities.

1. Appointment Process (Article III-D, Section 11.67.00(d)(3))

We recommend requiring a supermajority vote of the Board of Supervisors to reject a commissioner selected through the Ethics Commission's independent nomination process.

An ethics commission must be structurally independent from the officials it oversees. While Board confirmation provides an important public accountability check, allowing a simple majority of the Board to reject commissioners selected through the Commission's open, transparent, and independent nomination process unnecessarily increases the

¹ See proposes charter amendment on the July 21, 2026, LA County Board of Supervisors regular meeting agenda: <https://file.lacounty.gov/SDSInter/bos/supdocs/219141.pdf>

² See GRTF draft letter to L.A. County Board of Supervisors: <https://assets-us-01.kc-usercontent.com/0234f496-d2b7-00b6-17a4-b43e949b70a2/6bc25381-70d3-493a-a9c8-d53df30d32c0/GRTF%20Letter%20to%20Board%20re%20Draft%20Ethics%20Charter%20Amendment%20Language%20-%20FINAL.pdf>

risk of political influence over appointments. It also creates the appearance that commissioners ultimately serve at the pleasure of the very officials whose conduct they may later be called upon to oversee or investigate.

The charter amendment already establishes a thoughtful nomination process designed to ensure that commissioners are qualified, representative, and selected through a robust public process. Requiring a supermajority vote to reject a nominee appropriately balances the Board's oversight role with the need to preserve the independence of the Commission's appointment process. It ensures that a nominee may only be rejected when there is broad agreement that the individual is unsuitable for service, rather than for political or policy disagreements.

Accordingly, we recommend that commissioners selected through the Ethics Commission's independent nomination process be deemed confirmed unless rejected by a four-fifths vote of the five-member Board of Supervisors and, beginning in 2032, a seven-ninths vote of the nine-member Board of Supervisors within the prescribed confirmation period. This approach preserves the Board's ability to prevent clearly unqualified appointments while safeguarding the Commission's independence and reducing the potential for political interference.

See Appendix for proposed redline language implementing this recommendation.

2. Commission Recommendations to the Board (Section 11.68.00(M))

We recommend strengthening this provision to require the Board not only to agendize proposed amendments adopted by the Ethics Commission to laws within the Commission's jurisdiction, but also to approve, amend, or reject those proposed amendments within the required timeframe.

The current language requires that proposed amendments "be agendized for consideration and potential action" within 180 days. While this is preferable to having no deadline at all, experience demonstrates that merely requiring an item to appear on an agenda does not guarantee meaningful consideration.

The Los Angeles City Ethics Commission has long possessed the authority to place recommendations on the City Council agenda, yet numerous recommendations have remained pending for years without receiving a vote. As a result, many important ethics reforms have languished despite repeated recommendations from the City's independent ethics commission.

To avoid creating the same problem in Los Angeles County, the Charter Amendment should require the Board to take formal action on proposed amendments adopted by the Ethics Commission to laws within the Commission's jurisdiction by approving, amending, or rejecting each proposal within the specified timeframe.

See Appendix for proposed redline language implementing this recommendation.

3. Board Veto Threshold for Commission Rules (Section 11.68.50(C))

We recommend clarifying that the required two-thirds vote of the Board to veto rules and regulations adopted by the Commission is rounded up to the next whole number.

While under a nine-member Board, two-thirds equals a supermajority of 6, under the current five-member Board two-thirds mathematically equals 3.33 members. Without specifying that the threshold is rounded up, the provision could be interpreted as requiring only three votes from the five-member Board, which is simply a majority of the Board rather than the supermajority contemplated by the Governance Reform Task Force.

The charter amendment should therefore expressly require that any fractional voting threshold be rounded upward to the next whole number so that a true two-thirds vote is required.

See Appendix for proposed redline language implementing this recommendation.

4. Budget Protections (Section 9.11.70(B))

We appreciate the charter amendment's inclusion of a minimum funding requirement and annual inflationary adjustments. These protections are essential to preserving the Commission's independence.

However, **we recommend strengthening this provision in two respects.**

First, the minimum funding formula should account not only for inflation or personal per capita income in California, but also for new responsibilities imposed on the Commission that require additional personnel, such as oversight of a new law or the creation and implementation of a new database. If the Board or voters expand the

Commission's jurisdiction or assign additional duties, the funding formula should automatically include the reasonable costs associated with carrying out those new responsibilities. Likewise, the formula should account for employee step increases and other mandatory personnel cost increases that occur independently of inflation.

Second, the charter amendment currently allows the Board to suspend annual funding increases upon finding that "exigent circumstances" exist, but it does not define that term or require any explanation for such a finding. We recommend requiring the Board to adopt written findings, supported by a publicly available report, explaining the factual basis for determining that exigent circumstances exist. This transparency requirement would preserve flexibility during genuine emergencies while ensuring accountability whenever the Commission's guaranteed funding protections are suspended.

See Appendix for proposed redline language implementing these recommendations.

5. Separate Ballot Measure for the Ethics Commission Charter Amendment

We recommend placing the Ethics Commission Charter amendment before voters as a standalone ballot measure rather than combining it with unrelated governance reforms.

The proposed County ballot measure encompasses numerous distinct governmental reforms affecting the structure and operation of County government. Although these reforms share a broad governance theme, combining multiple substantial policy changes into a single measure may invite legal challenges under California's single-subject rule applicable to local initiatives and ballot measures. While courts generally construe the rule liberally, combining an independent ethics commission with unrelated structural reforms could create unnecessary litigation risk that may delay or jeopardize implementation of this important accountability measure.

The proposed Ethics Commission enjoys broad public support and stands on its own as a comprehensive reform designed to strengthen ethics, transparency, accountability, and public confidence in County government. Presenting it as a separate ballot measure would reduce potential legal uncertainty, allow voters to consider the proposal on its own merits, and avoid the possibility that litigation concerning unrelated provisions could delay or invalidate the establishment of the Commission.

Accordingly, we recommend that the Ethics Commission Charter amendment be submitted to the voters as a standalone ballot measure.

6. Severability and Future Operability

We recommend adding a severability and future-operability provision to the Charter amendment.

Because ethics laws frequently intersect with evolving constitutional doctrine and state preemption, individual provisions of the Charter amendment may be subject to future legal challenge or legislative change. Without an appropriate severability provision, uncertainty regarding one provision could unnecessarily affect the continued operation of the remainder of the Ethics Commission or require voters to approve a subsequent Charter amendment to restore provisions that later become legally permissible.

This approach ensures that any legal defect is narrowly confined to the affected provision while preserving the remainder of the Charter amendment. It also avoids the need for additional ballot measures to restore provisions that later become lawful because of legislative amendments or changes in judicial interpretation.

See Appendix for proposed redline language implementing this recommendation.

Thank you for your consideration of these amendments. We appreciate the significant effort that has gone into developing this charter amendment and believe these targeted revisions would further strengthen the independence, effectiveness, and long-term success of the Los Angeles County Ethics Commission.

Sincerely,

Sean McMorris

Transparency, Ethics & Accountability Program Manager
California Common Cause

Appendix

California Common Cause Proposed Redline Amendments to Draft Los Angeles County Ethics Commission Charter Amendment

Legend: underline = proposed addition; ~~strikethrough~~ = proposed deletion.

1. Appointment Process – Article III-D, Section 11.67.00(C)(3)

Proposed Redline

Within forty-five (45) days of a person being nominated to serve on the Commission, the Board of Supervisors shall schedule a meeting to appoint or reject the nominee ~~by a majority vote of the Board. A nominee selected pursuant to Subsection C(1)(d) may be rejected only upon the affirmative vote of four-fifths (4/5) of the members of the Board of Supervisors and, beginning January 1, 2032, seven-ninths (7/9) of the members of the Board of Supervisors. All other nominees may be appointed or rejected by a majority vote of the Board.~~ Notwithstanding any other provision of this Charter, if the Board does not act on a nomination within forty-five (45) days, the nominee shall be deemed appointed.

Explanation: This amendment strengthens the independence of the Ethics Commission by ensuring that commissioners selected through the Commission's independent nomination process may be rejected only by a supermajority vote of the Board of Supervisors. It preserves Board oversight while reducing the potential for political interference in appointments made through an independent public process.

2. Commission Recommendations – Section 11.68.00(M)

Proposed Redline:

Regularly review the County Code and make recommendations to the Board of Supervisors for updates regarding campaign finance, lobbying, conflicts of interest, and governmental ethics, and other laws the Commission is responsible for administering or enforcing. The Commission may propose amendments to any law it enforces or administers. Any proposed amendment adopted by the Commission shall be submitted to the Board of Supervisors, agendized for consideration by the full Board, and approved, amended, or rejected by the Board within one hundred eighty (180) days of its submission.

Explanation: This amendment requires the Board of Supervisors to take formal action on Commission-adopted proposals to amend laws within the Commission's jurisdiction. It ensures that the Commission's policy recommendations receive timely consideration while preserving the Board's discretion to approve, amend, or reject each proposal.

3. Board Veto Threshold – Section 11.68.50(C)

Proposed Redline

...two-thirds of all members of the Board of Supervisors, rounded upward to the next whole number vote to veto the rule or regulation.

Explanation: This amendment clarifies how the required two-thirds vote is calculated, eliminating ambiguity under both the current five-member Board and the future nine-member Board.

4. Budget Protections – Section 11.70.00(B)

Insert after the annual adjustment formula:

In addition, the minimum operating budget shall be adjusted to account for: (a) the reasonable personnel costs associated with any new duties, responsibilities, or jurisdiction assigned to the Commission or Office of Ethics Compliance that require additional personnel; and (b) employee step increases and other mandatory personnel cost increases.

Insert at the end of the subsection:

Any determination that exigent circumstances exist shall be supported by written findings adopted at a public meeting and accompanied by a publicly available report describing the factual basis for the determination.

Explanation: These amendments preserve the Commission's financial independence by ensuring that guaranteed funding accounts for (1) additional personnel required because of expanded duties or jurisdiction, and (2) employee step increases and other mandatory personnel cost increases.

5. New Section 11.70.50 – Severability; Construction; Future Operability

Insert immediately after Section 11.70.00:

11.70.50 Severability; Construction; Future Operability.

The provisions of this Article are severable and independently operative. If any provision of this Article, or its application to any person or circumstance, is held invalid, unlawful, preempted, or unenforceable, the remaining provisions shall remain in full force and effect.

Any provision determined to be preempted by or inconsistent with state or federal law shall be construed and applied to the maximum extent permitted by law and shall be deemed suspended only for so long as such preemption or inconsistency exists. Upon any subsequent change in state or federal law, including amendment, repeal, judicial interpretation, or administrative determination, that would permit enforcement of the provision, the provision shall automatically become operative to the fullest extent permitted without further action by the voters or the County.

This Article shall be liberally construed to effectuate its purposes of promoting ethics, accountability, transparency, independence, and public trust in County government.

Explanation: This amendment ensures that if any provision of the Ethics Commission Charter is temporarily preempted or held unenforceable, the remaining provisions remain in effect and any suspended provision automatically becomes operative if future changes in law permit its enforcement. This protects the Charter's long-term effectiveness without requiring additional voter approval.