

KAUFMAN LEGAL GROUP

A PROFESSIONAL CORPORATION

October 7, 2020

Direct: (213) 452-6550

VIA E-MAIL

Kirsten Pickenpaugh
Interim Enforcement Director
City of Los Angeles Ethics Commission
200 North Spring Street
City Hall, 24th Floor
Los Angeles, California 90012
E-Mail: Kirsten.Pickenpaugh@lacity.org

**Re: Complaint Against Grace Yoo and Grace Yoo for City Council 2020
- General**

Dear Ms. Pickenpaugh:

I am writing on behalf of the Mark Ridley-Thomas for City Council 2020 campaign to file a complaint against Grace Yoo and her campaign committee, Grace Yoo for City Council 2020 – General (ID# 1426052) (“Committee”), for failure to file three campaign communications with the Los Angeles City Ethics Commission, as required by Los Angeles Municipal Code Section 49.7.32. Ms. Yoo is a candidate for Los Angeles City Council in the 10th District, in the November 3, 2020 election.

Facts

Grace Yoo and her campaign committee distributed three campaign communications in September 2020 without uploading them to the Los Angeles City Ethics Commission’s public disclosure portal. These communications are enclosed as Attachments to this letter and consist of the following:

- Door hanger distributed on or about September 23, 2020.
- Lawn sign for the general election observed on September 27, 2020.
- Digital advertisement on Daily Breeze newspaper website observed on September 30, 2020.

As of the time of filing this complaint, Ms. Yoo and her Committee have not disclosed these campaign communications in accordance with LAMC Section 49.7.32 by uploading images of the materials to the public access portal on the Ethics Commission’s website.

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Municipal Ordinance Violated

Under Section 49.7.32 a person who makes or distributes a campaign communication to 200 or more persons must file a copy of the communication with the Ethics Commission within 24 hours. Door hangers, lawn signs and digital advertisements all qualify as communications for which disclosure is required under Section 49.7.32. As of this morning, none of these communications have been disclosed on the Ethics Commission's public portal, despite the fact that they have been in circulation or were posted more than a week ago.

Consequently, Ms. Yoo and her Committee have violated the City ordinance as follows:

1. Failure to disclose a campaign door hanger distributed on or about September 23, 2020.
2. Failure to disclose a campaign lawn sign distributed no later than September 27, 2020.
3. Failure to disclose a campaign digital advertisement in the on-line version of the Daily Breeze newspaper, distributed no later than September 30, 2020.

Disclosure to the public of a candidate's campaign communications is an essential aspect of the City's ethics laws. By failing to file these three campaign communications with the City Ethics Commission, Ms. Yoo and her campaign deprived the public of important information to which they are entitled. We, therefore, request that the City Ethics Commission investigate and prosecute these violations of the City's campaign disclosure laws.

We appreciate your prompt attention to this matter.

Sincerely,



Stephen J. Kaufman

SJK:AS