Based on information and belief, I hereby allege that the following individuals have engaged in lobbying activities without complying with the Lobbyist Registration Ordinance:

Victor K. Uno is employed by the International Brotherhood of Electrical Workers, Local 595, with offices in Dublin, CA. See his resume, filed with the agenda packet for the Oakland City Council meeting of July 17, 2007, where he notes that "building relations with government officials" is a part of his paid duties.

Mr. Uno wrote letters on behalf of IBEW 595 to City Council members, urging them to select the team led by Philip Tagami for development of the Oakland Army Base. This is a lobbying activity that should have resulted in registering with the Ethics Commission, but Mr. Uno did not do so.

Based on information and belief, I hereby allege that the following individuals have engaged in lobbying activities without complying with the Lobbyist Registration Ordinance:

Joseph Haraburda is the president and chief executive officer of the Oakland Metropolitan Chamber of Commerce. He is a paid staff member whose duties include lobbying Oakland government officials. He has been the CEO since prior to passage of the Lobbying Ordinance, and, at his direction, the Chamber took part in the public process that led to passage of the Lobbying Ordinance. Thus, he certainly should be aware of the ordinance and its provisions requiring registration of lobbyists.

Scott Peterson is Director of Public Policy for the Oakland Metropolitan Chamber of Commerce. He is a paid staff member whose duties include lobbying Oakland government officials

Mr. Haraburda and Mr. Peterson have spoken at City Council and Council committee meetings many times during the past several years. The Chamber has also frequently written letters to the Mayor and City Council, City Administrator, and/or other city officials on a wide range of topics, almost all dealing with proposed actions that are not ministerial in nature.

On or about Jan. 26, 2010, Mr. Haraburda wrote a letter to City Administrator Dan Lindheim, calling for the suspension of a City Charter provision that prohibits the contracting out of functions that would cause the loss of employment for city employees. This is not a ministerial action, and should result in paid Chamber employees registering as lobbyists.

Mr. Haraburda and other paid Chamber employees privately met with Mayor Ron Dellums and/or his staff, officials of the Community and Development Agency, and others on multiple occasions between January 2007 and the present to make changes and/or modifications to existing city policies. This is not a ministerial action, and should result in paid Chamber employees registering as lobbyists.

Some of these closed-door meetings led to the creation of a private group called The Oakland Partnership, which is actively working to make changes and/or modifications to existing city policies. This is not a ministerial action, and should result in paid Chamber employees registering as lobbyists.

As part of investigating this complaint, Ethics Commission staff should ask both the Chamber and all city officials to produce each and every letter generated to them by the Chamber during the entire period within the statute of limitations. These officials include, but not be limited to, the Mayor and his staff; City Council members, legislative analysts and other staff; City Attorney; City Auditor; City Administrator and staff; and CEDA Director, deputy directors, and staff:

Ethics Commission should also make the same inquiry to each entity within the city, and each contractor acting on behalf of the City to administer loans and/or other City funds.

Based on information and belief, I hereby allege that the following individuals have engaged in lobbying activities without complying with the Lobbyist Registration Ordinance:

Sharon Cornu is Secretary-Treasurer of the Alameda County Central Labor Council. She is a paid staff member whose duties include lobbying Oakland government officials.

For the entire period within the statute of limitations of the Lobbying Ordinance as of March 18, 2010, Ms. Cornu has regularly appeared at Oakland City Council meetings to advocate on behalf of organized labor. While these appearances are protected free speech exempt from lobbyist registration, Ms. Cornu has regularly and repeatedly held private discussions with multiple city officials, and written e-mails and letters urging specific Council actions that are not ministerial in nature.

In deliberations by City Council regarding which development team to select for the Oakland Army Base project, Ms. Cornu repeatedly urged Council members to select CCG/AMB. During much of the first seven months of 2009, Ms. Cornu wrote letters of support on behalf of the Central Labor Council, urging City Council selection of the CCG/AMB team

Ms. Cornu should be aware of the ordinance and its provisions requiring registration of lobbyists, having sat in the audience while the Lobbyist Ordinance was discussed.

Had Ms. Cornu registered as a lobbyist, and had she disclosed her advocacy for CCG/AMB, the public and competing development teams would have known that a lobbyist had been selected by the City to sit as a member of the evaluation panel to select the development team for the Army Base project.

Ethics Commission staff should also review Ms. Cornu's failure to register and disclose for potential violations of state conflict-of-interest codes and/or Oakland's Campaign Reform Act.

Barry Luboviski was Secretary-Treasurer of the Alameda County Building Trades Council through late 2009. He was a paid staff member whose duties included lobbying Oakland government officials.

For the entire period within the statute of limitations of the Lobbying Ordinance as of March 18, 2010, Mr. Luboviski has regularly appeared at Oakland City Council meetings to advocate on behalf of organized labor. While these appearances are protected free speech exempt from lobbyist registration, Mr. Luboviski has regularly and repeatedly held private discussions with multiple city officials, and written e-mails and letters urging specific Council actions that are not ministerial in nature.

In deliberations by City Council regarding which development team to select for the Oakland Army Base project, Mr. Luboviski repeatedly urged Council members to select CCG/AMB. During much of the first seven months of 2009, Mr. Luboviski wrote letters of support on behalf of the Central Labor Council, urging City Council selection of the CCG/AMB team

Mr. Luboviski should be aware of the ordinance and its provisions requiring registration of lobbyists, having sat in the audience while the Lobbyist Ordinance was discussed.

As part of investigating this complaint, Ethics Commission staff should ask both Ms. Cornu and Mr. Luboviski to produce all writings they sent to any city official within the period of the statute of limitations.

Staff should ask all city officials to produce each and every letter generated to them by either individual during the entire period within the statute of limitations. These officials include, but should not not be limited to, the Mayor and his staff; City Council members, legislative analysts and other staff; City Attorney staff; City Auditor; City Administrator and staff; and CEDA Director, deputy directors, and staff:

Ethics Commission staff should also review the appointment logs of all city officials specified above, along with those of Ms. Cornu and Mr. Luboviski

Based on information and belief, I hereby allege that the following individuals have engaged in lobbying activities without complying with the Lobbyist Registration Ordinance:

Philip Tagami is Managing Partner of the California Commercial Group (CCG) and an affiliated company, California Coomercial Investments (CCI). He is a paid principal with compenmation believed to be well in excess of $1,000 per month. His duties include lobbying Oakland government officials.

For the entire period within the statute of limitations of the Lobbying Ordinance as of March 22, 2010, Mr. Tagami has regularly, frequently and repeatedly held private discussions with multiple city officials, and written e-mails and letters urging specific Council actions that are not ministerial in nature.

In deliberations by City Council regarding which development team to select for the Oakland Army Base project, Mr. Tagami met with almost every Council member; mayoral staff, including former Chief of Staff David Chai; Walter Cohen, Director of the Community and Economic Development Agency; and other CEDA staff and other City staff.

Mr. Tagami also solicited letters of support on behalf of a proposal submitted by CCI in partnership with AMB, urging City Council selection of the AMB/CCI team to develop the Oakland Army Base. In fact, a number of the individuals who wrote letters of support should themselves be required to register as Oakland lobbyists, but have never done so.

One or more representatives of AMB also lobbied city officials regarding the Army Base, but failed to register as lobbyists.

After I mentioned Mr. Tagami's failure to register as a lobbyist at several public meetings, he did so in mid-2009. He failed to renew his registration as of Feb. 3, 2010, the latest report posted on the city's web site.

Mr. Tagami is believed to have lobbied City officials during 2010 regarding the Fox Theater project and soliciting additional subsidies from the Oakland Redevelopment Agency.

AMB/CCI's main competitor was Federal Associates. Merlin Edwards registered as a lobbyist and filed paperwork with the Ethics Commission regarding his representation of Federal Associates.

Ethics Commission staff should review records of the Oakland Redevelopment Agency to ascertain which other individuals may have lobbied City officials and./or staff on the Army Base project.

Commission staff should ask all city officials to produce each and every letter sent to them by any individual about the Army Base and the Fox Theater during the entire period within the statute of limitations. These officials include, but should not be limited to, the Mayor and his staff; City Council members, legislative analysts and other staff; City Attorney staff; City Auditor; City Administrator and staff; and CEDA Director, deputy directors, and staff:

Ethics Commission staff should also review the appointment logs of all city officials specified above to ascertain meetings about either the Army Base or the Fox Theater.

Elected officials have failed to respond to public records requests from East Bay News Service to produce their appointment books and calendars, necessitating research by Ethics Commission staff to ascertain which individuals engaged in lobbying without registering.