

HARBOR DIVISION

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DATE: MAY 7, 2026

FROM: OFFICE OF THE CITY ATTORNEY

SUBJECT: RESOLUTION NO. _____ APPROVAL OF A CONFLICT WAIVER TO WAIVE ANY POTENTIAL CONFLICT RELATED TO FEDERAL LOBBYING SERVICES OF MANATT GOVERNMENT STRATEGIES, LLC AND ITS MANAGING ENTITY MANATT, PHELPS & PHILLIPS, LLC

SUMMARY:

The Office of the City Attorney (Office) requests approval of a proposed written conflict waiver (Conflict Waiver) related to a potential conflict-of-interest with Manatt Government Strategies, LLC (MGS), a federal lobbying services entity, and the law firm Manatt, Phelps & Phillips, LLC (Manatt). Manatt holds the position of manager for MGS. The City of Los Angeles (City) Harbor Department (Harbor Department) is considering engaging MGS and two recently hired non-lawyer professionals who previously worked with the Harbor Department and have ongoing projects with the Harbor Department. Approval of the proposed waiver is not anticipated to have a financial impact on the Harbor Department.

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RECOMMENDATION:

It is recommended that the Board of Harbor Commissioners (Board):

1. Find that the Director of Environmental Management has determined that the proposed action is administratively exempt from the requirements of the California Environmental Quality Act (CEQA) under Article II Section 2(f) of the Los Angeles City CEQA Guidelines;
2. Approve a Conflict Waiver to formally waive any potential conflicts that might arise from MGS's advice and federal lobbying services, and its managing entity Manatt;
3. Authorize the Executive Director to execute the Conflict Waiver; and
4. Adopt this Resolution No. _____.

DISCUSSION:

Manatt Government Strategies (MGS) Engagement Considered by Harbor Department -
The Harbor Department is considering engaging MGS for federal lobbying services. MGS recently hired two non-lawyer professionals, Eve O'Toole and Leslie Pollner, as Managing Directors. Ms. O'Toole and Ms. Pollner worked with the Harbor Department prior to joining MGS through a contract with the law firm Holland & Knight, LLC that was entered into pursuant to a public Request for Proposal (RFP) process undertaken by the Harbor Department. Their work included tracking, with respect to the California and federal legislatures, the Fiscal Year 2026 appropriations process and priority legislation; regular updates on funding opportunities, pauses and clawbacks; maintaining relationships with the Harbor Department and the California congressional delegation; regular updates on tariffs and trade policy; and closely monitoring developments with the Water Resources Development Act in relation to the Harbor Maintenance Trust Fund. The Harbor Department expects that scope of work provided by Ms. O'Toole and Ms. Pollner through MGS will be the same as when they were providing services for the Harbor Department while at Holland & Knight, LLC.

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Representation by MGS – MGS does not represent any other clients in matters currently adverse or involving the Harbor Department.

Representation by Manatt - MGS is managed by Manatt. Manatt does not currently represent the Harbor Department or any other City entities. Manatt does represent other clients in matters currently adverse to or involving the Harbor Department, all of which are unrelated to the proposed continued lobbying work for the Harbor Department, including:

- Manatt’s representation of Anacostia Rail Holdings Company/Pacific Harbor, Inc. in connection with a port permit extension with the Port of Los Angeles (Port) and the Port of Long Beach for the operation of rail lines, in which the Port and the City are permitting authorities.
- Manatt’s representation of Plains All American Pipeline in connection with its liquified petroleum gas facility in San Pedro on regulatory matters being considered by the Port.
- Manatt’s representation of Athens Services in connection with contracting and land use matters involving the Port.
- Manatt’s representation of Lenovo in procurement assistance that may involve the Port.
- Manatt’s representation of Skydio in procurement assistance that may involve the Port.
- Harbor Park Development Partners, LLC: in connection with a bid protest regarding award of a Port contract for Cabrillo Way Marina to Bellwether Financial Group.
- Maire, Richard; Corry, Ken; Schop, Bill; and Marie, Kelly: in connection with creating and registering two non-profit entities, and then assisting such entities, the key purpose of which is to take possession of a twelve-acre site in the Port being repurposed by the Port to make available a site suitable for youth sailing and other water sport training and activities with a particular outreach to underserved communities.

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Request for Waiver of Potential Conflict – With respect to the engagement of MGS in federal lobbying matters, it is requested that the Board approve a written conflict waiver of the potential conflict of interest under the following conditions:

Manatt and MGS will create firewalls such that professionals providing lobbying services, including Ms. O’Toole and Ms. Pollner, will be screened off from Manatt firm matters, will not work on Manatt firm matters, and will not have access to files of the Manatt firm matters. Likewise, professionals working on Manatt firm matters will be screened off from the lobbying work provided to the Harbor Department, will not provide lobbying services to the Harbor Department, and will not have access to lobbying files for Harbor Department lobbying matters.

The Office has reviewed the requested Conflict Waiver (Transmittal 1) and recommends its approval by the Board. MGS and Manatt are separate entities. The proposed engagement of MGS for federal lobbying work and Manatt’s representation of other entities are unrelated. An ethical firewall will be created as described above.

ENVIRONMENTAL ASSESSMENT:

The proposed action is the approval of a proposed Conflict Waiver to waive any conflict that might arise from the engagement of MGS. Therefore, the Director of Environmental Management has determined that the proposed action is administratively exempt from the requirements of CEQA in accordance with Article II Section 2(f) of the Los Angeles City CEQA Guidelines.

FINANCIAL IMPACT:

The proposed action is for the approval of a Conflict Waiver to waive any conflict that might arise from the engagement of MGS. Approval of the proposed resolution will not have a financial impact on the Harbor Department.

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CITY ATTORNEY:

The Office has reviewed the Conflict Waiver and approved it as to form and legality.

TRANSMITTAL:

1. Conflict Waiver

FIS Approval: JS
CA Approval: SO



DEBORAH DORNY
Deputy City Attorney

APPROVED:

By

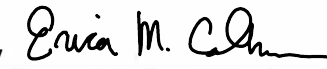


STEVEN NOTERA

General Counsel, Harbor Department

APPROVED:

By



EUGENE D. SEROKA

Executive Director