

**CITY OF OAKLAND**  
**Public Ethics Commission**

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**TO:** Public Ethics Commission  
**FROM:** Daniel Purnell  
**DATE:** October 6, 2003

**RE: A Report And Action To Be Taken To Initiate A Public Ethics Commission Complaint Against Merlin Edwards For The Alleged Failure To File A Quarterly Report On Lobbying Activities**

The Oakland Lobbyist Registration Act requires all registered lobbyists to file quarterly reports with the Office of the City Clerk. The quarterly reports are due 30 days after the end of the calendar quarter. [O.M.C. §3.20.110] Lobbyists are required to disclose their lobbying activities during the calendar quarter or to indicate that no lobbying activity occurred.

**Attachment 1.**

On June 18, 2003, Merlin Edwards filed his initial lobbyist registration. He listed his clients as "rental car agencies." **Attachment 2.** Commission staff requested further identification of his clients. Mr. Edwards filed an amendment to his initial registration on July 11, 2003, identifying his clients as "Avis, National, Hertz, Alamo, Dollar and Enterprise." He also listed a client identified as "Skyline Ridge." **Attachment 3.** The City Clerk reports that Mr. Edwards did not file a quarterly report by July 30, 2003.

On August 20, 2003, Commission staff mailed a letter to Mr. Edwards advising him that his quarterly report was overdue and that the failure to file a quarterly report by August 29, 2003, would result in a request for the Commission to initiate enforcement proceedings against him. **Attachment 4.**

At the time of this writing, the City Clerk has advised that there is no record of Mr. Edwards' filing a quarterly report for the period ending June 30, 2003.

Pursuant to Section I.C. of the General Complaint Procedures, Commission staff recommends that the Commission direct staff to initiate a formal complaint against Mr.

Edwards, conduct a further investigation into the alleged violation, and provide the Commission with a preliminary staff report at a subsequent meeting.

Respectfully submitted,

Daniel D. Purnell  
Executive Director