



**California Political Attorneys Association**  
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November 7, 2011

**Via Email and U.S. Mail**

Chair Ann Ravel and Commissioners  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, CA 95814

**Re: Agenda Item No. 25 – Amendments to Regulations 18940-18950.4**

Dear Chair Ravel and Commissioners:

On behalf of the California Political Attorney's Association ("CPAA"), we are writing to express our support for the Commission's efforts to simplify and clarify the gift regulations.

The Commission's staff has presented a comprehensive package of regulatory reforms designed to provide greater clarity to the regulated community and ensure more consistent compliance with the Political Reform Act. We believe that the proposed regulations are a marked improvement over the current regulatory scheme, and that this comprehensive overhaul will eliminate many of the existing inconsistencies. Nonetheless, as with any significant regulatory change, a few issues remain unresolved, and we expect that individual members of CPAA may wish to comment on specific regulations at the Commission's November 10<sup>th</sup> meeting.

As part of the implementation process, we also encourage the Commission to review its prior advice and clarify which letters are now superseded or no longer applicable in light of the revised regulations. The comprehensive memorandum accompanying the proposed regulations serves as an invaluable guide to navigating the new regulations, but additional clarification regarding prior Commission advice would be helpful.

Finally, we appreciate the opportunities afforded interested parties throughout the drafting process to provide input on issues of concern. And we would like to thank the FPPC's staff, particularly Senior Commission Counsel Bill Lenkeit, for approaching this project thoughtfully and with an open mind. We believe that the final product presented to the Commission attempts to balance the interests of all interested parties – acknowledging real world situations while ensuring full accountability and disclosure to the public.

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We thank you for your consideration and look forward to attending the Commission's meeting later this week.

Very truly yours,



Stephen J. Kaufman – Kaufman Legal Group APC  
Chair, CPAA Regulatory Committee

James Harrison – Remcho, Johansen & Purcell LLP  
Kevin R. Heneghan -- Hanson Bridgett LLP  
Richard Rios – Olson, Hagel & Fishburn LLP  
Jennie Unger Skelton -- Nielson, Merksamer, Parrinello, Gross & Leoni LLP  
Ashlee N. Titus -- Bell, McAndrews & Hiltachk LLP

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