



April 29, 2016

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Honorable Kevin Mullin
Member, California State Assembly
Capitol Building, Room 3160
Sacramento, CA 95814

**RE: AB 2523 (Mullin) – Local elective offices: contribution limitations.
As Amended on April 19, 2016 – OPPOSE UNLESS AMENDED
Set for Hearing on May 4, 2016 – Assembly Appropriations Committee**

Dear Assembly Member Mullin:

On behalf of the California State Association of Counties (CSAC), I write to inform you of our respectful opposition to your Assembly Bill 2523 unless amendments are taken to address our concerns. We have appreciated the robust dialogue with your office and the amendments previously accepted to preserve local control of campaign contribution rules. However, we continue to have serious concerns regarding county cost burdens for when a city, special district, school district or community college district is subject to the “default” statewide campaign finance rules. Clarification is also needed on how the default campaign finance rules will apply in certain scenarios that involve the county district attorney or a local agency serving multiple counties.

Specifically, AB 2523 would require the district attorney of the county in which a violation occurs to be responsible for enforcing civil and criminal penalties under the default campaign finance rules. This creates two problems from an implementation standpoint that must be addressed. First, the county district attorney is an elected office that would be held to same campaign contribution limits as other elected officials. Second, special district and school district (including community college district) jurisdiction can encompass multiple counties. The bill is silent on how enforcement would be handled for violations related to county district attorneys or local agencies that cross county boundaries.

We are also troubled by the potential cost and workload that would fall to the county district attorney, and therefore the county budget, to investigate and enforce campaign finance rules for all local agencies located within the county. For example, in San Mateo County there are over 65 separate local government agencies, governed by boards or councils consisting usually of five members each. The demands on county resources to receive claims of campaign finance violations, conduct investigations and carry out the enforcement would be extensive even if just half of the local agencies in the county chose the default campaign finance rules.

Making matters worse, counties would be left footing the bill. This is because the mandates in AB 2523 would not be eligible for reimbursement since the provisions relate to creating a new crime and penalty. We respectfully request that opportunities to distribute the workload are considered and more importantly, a mechanism for state financial assistance is established.

We look forward to further discussions with your office on these matters. However, at this time we must offer our respectful opposition to AB 2523 unless amendments are taken to address

—continued—

the aforementioned concerns. If you have any questions about our position, please do not hesitate to contact me at (916) 327-7500, ext. 515.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dorothy Holzem", with a long horizontal flourish extending to the right.

Dorothy Holzem
Legislative Representative