



California Political Attorneys Association

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March 20, 2018

VIA ELECTRONIC MAIL

Chair Jodi Remke and
Commissioners Audero, Cardenas, Hayward, and Hatch
1102 Q Street, Suite 3000
Sacramento, CA 95814

**RE: Comment Letter on Item 20 – Report of the Ad Hoc Committee on FPPC
Governance**

Dear Chair Remke and Commissioners:

I write on behalf of the California Political Attorneys Association Executive Board to commend the Commission's Ad Hoc Committee on FPPC Governance on its exhaustive report and to embrace its recommendations. In sum, we support the Committee's proposal to establish four standing committees that will involve all Commissioners in agency oversight and that will serve to better focus the agency on achieving its mission in critical areas.

In particular, we welcome the creation of standing committees in the areas of Legislation and Law and Policy. One of the longstanding challenges in the area of campaign and lobby compliance is the adoption of rules that effectively balance the need for public disclosure with the costs and burdens imposed upon those who are regulated by the Political Reform Act. It is our hope that the establishment of such committees will bring more order and consistency to legislation, regulations, rules and advice considered and adopted by the Commission and other policymakers.

We also have two suggestions for further consideration by the Commission as it considers changes to its governance procedures. First, we recommend that the Commission further evaluate its policy and practices of engaging with the media, particularly in circumstances involving commenting on enforcement matters that arise in close proximity to elections. Second, in the past, the Commission has made effective use of a regulatory calendar to prioritize

Letter to FPPC re: Governance Issues

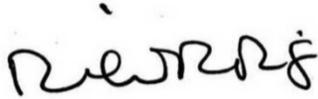
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proposed regulations. The Commission may wish to consider whether the establishment of such a calendar would be useful in organizing its regulatory efforts.

We commend the Ad Hoc Committee on its report and look forward to collaborating with the Commission in its future efforts on governance reform.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Rios". The signature is written in a cursive, somewhat stylized font.

RICHARD R. RIOS

Past President and Board Member, 2011-2016

cc: CPAA Executive Board Members