



**California Political Attorneys Association**

c/o Bell, McAndrews & Hiltachk, LLP  
455 Capitol Mall, Suite 600  
Sacramento, CA 95814  
Telephone: (916) 442-7757  
Facsimile: (916) 442-7759

May 13, 2019

**VIA ELECTRONIC MAIL**

Chair Miadich  
Commissioners Cardenas, Hatch, and Hayward  
c/o Phillip Ung, Director, Legislation and External Affairs (PUng@fppc.ca.gov)  
Fair Political Practices Commission  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

**RE: Support Staff Recommendation to delay CARS launch to February 1, 2021**

Dear Chair Miadich and Commissioners:

The California Political Attorneys Association (“CPAA”) is a membership organization of attorneys whose practice includes compliance with campaign finance and lobbying disclosure laws in California. Many of our members provide professional services to the regulated community that includes preparing and filing disclosure forms with the Secretary of State’s office. Accordingly, CPAA has and continues to participate in the development of the CAL-ACCESS Replacement System (“CARS”). In response to our letter dated March 29, 2019, the Secretary of State significantly improved its communication with our association and other stakeholders, is now posting notices of all of its meetings on its publicly-accessible webpage of CARS news and updates, and scheduled a meeting with CPAA and CPTA membership. Going forward, CPAA will make the most of being included in the process.

**We write to support the recommendation of your staff to seek urgency legislation delaying CARS implementation until after the 2020 election cycle, and specifically delaying to February 1, 2021.** As the staff report states, the current launch date of December 31, 2019 would occur during the 24 hour reporting period for the March 3, 2020 election, with three additional reporting deadlines occurring within the first three months of the system’s operation. Staff recognizes the current launch date is completely unworkable for all involved: filers would be grappling with using a new software program when they least have the time to learn it, and staff of the FPPC and Secretary of State would be unable to handle the volume of demands for technical support while also responding to the usual increased workload that arises during the filing season.

Letter regarding CAL-ACCESS Replacement System Project

May 13, 2019

Page 2

CPAA membership is invested in seeing that Cal-Access is replaced, but the replacement should be an improvement over Cal-Access; it should be better for filers and better for the public. Rushing this project and launching it during an election cycle will not result in a product that improves upon the system it is replacing. We support a delay that provides the Secretary of State CARS Project Management Team the time to confer with users of the software and to properly design, test, and launch a program without the pressure of an intense filing season.

Respectfully submitted,



Ashlee Titus, Director at Large

*on behalf of the California Political Attorneys Association (CPAA)*

cc: Secretary of State (PRDCARS@sos.ca.gov)  
Assemblymember Marc Berman, Chair, Assembly Committee on Elections and Redistricting (assemblymember.berman@assembly.ca.gov)  
Assemblymember James Gallagher, Vice Chair, Assembly Committee on Elections and Redistricting (assemblymember.gallagher@assembly.ca.gov)  
Senator Thomas J. Umberg, Chair, Senate Committee on Elections and Constitutional Amendments (senator.umberg@senate.ca.gov)  
Senator Jim Nielsen, Vice Chair, Senate Committee on Elections and Constitutional Amendments (senator.nielsen@senate.ca.gov)  
California Political Treasurers Association (CPTA) (dlgould@gouldorellana.com) (Laura@stephencompany.com)