



September 18, 2018

Fair Political Practices Commission
1102 Q St, #3000
Sacramento, CA 94249

RE: Item 22 - Amended Regulation 18422 and Proposed Regulation 18422.1

Dear Chair Miadich and Commissioners,

Our three organizations strongly support regulations to strengthen campaign financial disclosure and accountability. We all supported SB 27 when the bill passed through the Legislature, and remain strongly supportive of its goal to enhance campaign finance transparency.

However, as we review the proposed implementation regulations, we are concerned about the potential burden these regulations will put on smaller organizations. In particular, the record-keeping requirements for donations under \$1,000 may be difficult for small nonprofits, like ours, to comply with. With the busy end of the Legislative cycle, we have not yet been able to spend the time we'd like reviewing the proposed regulations, including with our national offices that assist with finances for some of our organizations.

We request that the Commission postpone this item to next month's meeting, when we should have capacity to provide more informed feedback.

Sincerely,

/s/ Carol Moon Goldberg
President
League of Women Voters of California

/s/Rey Lopez-Calderon
Executive Director
California Common Cause

/s/Trent Lange
Executive Director
California Clean Money
Campaign