

## Sasha Linker

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**From:** Toren Lewis  
**Sent:** Tuesday, June 16, 2020 3:25 PM  
**To:** Branche Jones  
**Cc:** Sasha Linker  
**Subject:** Re: Possible regulations

Branché, Not a problem at all. I will make sure they're included. I'm CC'ing my colleague Sasha, who is in charge of our agenda and comment letters.

Sasha, could you please add the email below to the public comment received for Thursday's agenda?

Thank you!

**Toren A. Lewis**  
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**From:** Branche Jones <branchejones@gmail.com>  
**Sent:** Tuesday, June 16, 2020 10:07 AM  
**To:** Toren Lewis <tlewis@fppc.ca.gov>  
**Subject:** Re: FW: Possible regulations

### EXTERNAL EMAIL

Toren thank you for your response, I appreciate it. My client, the California Political Treasurers Association, represents around 95% of the folks that do the campaign and lobbying filings in the state. My client has a few issues with the regs as they are proposed. If adopted they would like you to consider making them effective in January so they don't have to implement them in the middle of an election. Below are some other points of concern for them. Thanks in advance for considering their concerns.

1. We are the ones that are going to have to educate these donors of the requirements. It forces the committee and treasurers to educate during an upcoming election and 24hr reporting period. It would be different to start in January, where we will have more time before the next statewide election.
1. There is the Personal liability aspect to the responsible officer, who in turn may say never mind...and now your asking the committee to refund contributions/amend 24hr reports, during the middle of an election.
1. There will be press releases related to this; making it look like this person made the contribution when all they did was sign on behalf of the LLC.
1. 24hr reporting will become more difficult.
1. Everyone may report differently. Where to put the responsible officers name, before or after the name of the LLC.
1. What happens if there's affiliated entities. ie. John Smith and Affiliated Entities...what if one of the affiliated entities is an LLC, do we now need two names in the filer name?
1. If it goes forward, maybe disclose the responsible officer as a Public note. Also the way it's currently drafted the major donor will need to be signed by the responsible officer, if an LLC. (so if major donor LLCs have to be signed by the responsible officer, why does that committee then need to add their name? Finally, this contradicts all the advice letters that have allowed us a treasurer or atty/agent for filer, to sign on their behalf.