



CALIFORNIA POLITICAL ATTORNEYS ASSOCIATION

April 1, 2019

VIA ELECTRONIC MAIL

Chair Germond and Commissioners Cardenas, Hatch and Hayward
Fair Political Practices Commission
1102 Q Street, Suite 3000
Sacramento, CA 95811

RE: Request for Regulatory Changes

Dear Chair Germond and Commissioners:

I write on behalf of the California Political Attorneys Association to commend the Commission for its decision to adopt a regulatory calendar and to request that the Commission make additional regulatory changes in 2019. While we believe that the regulatory calendar adopted by the Commission is a great first step in identifying the priorities of the Commission, we believe there are other areas of regulation that also merit attention in 2019.

Our proposed changes to the regulatory calendar are focused on cleaning up and streamlining the processes for filing Top 10 contributor lists and 24-hour reports as well as clarifying disclaimer rules that apply to campaign signs, as discussed in more detail below. Because issues of interpretation applicable to the Disclose Act is part of the currently proposed regulatory calendar, we request that the Commission take into consideration the proposed change regarding campaign signs as part of that review. In order to ensure that our ideas for regulatory change do not impose a substantial burden on Commission staff, we include proposed regulatory language for the changes we are requesting related to Top 10 and 24-hour reporting. Below is a summary of our recommendations.

1. Request for Regulatory Changes regarding Top Ten Contributor List Filings (See Attachment 1)

Primarily formed committees established to support or oppose a state candidate or state ballot measure that raise one million dollars or more for an election are required to maintain and file lists of the committee's top 10 contributors. Committees are required to file amendments to their Top 10 contributor reports (a) any time a new person qualifies as a top 10 contributor, (b) any time a person who is an existing top 10 contributor makes additional contributions to the committee, and (c) any time a change occurs that alters the relative ranking order of the top 10 contributors. (Cal. Gov. Code §84223(c)(2).)

When a committee that is a Top 10 filer has a Top 10 contributor that is also a recipient committee, the Top 10 filer is required to disclose the top two donors of \$50,000 or more to the Top 10 contributor unless the Top 10 contributor has filed its own Top 10 contributor reports. The top two donors must be updated each time the Top 10 contributor makes an additional contribution to the Top 10 filer.

We request that the Commission consider two important changes to Top 10 donor disclosure. First, we request that the Commission establish a minimum increment of \$10,000 in additional aggregate contributions from any single donor in order to trigger an amendment to a Top 10 contributor list. Currently, any time a Top 10 filer receives a new contribution *in any amount* from an existing Top 10 donor, the committee is required to amend its Top 10 contributor list to reflect the new contributions even if the amount of the contribution is relatively small. For example, a Top 10 filer that receives ongoing in-kind contributions from a Top 10 donor will be required to amend its Top 10 contributor list for every in-kind contribution regardless of the amount. Because many Top 10 filers receive ongoing in-kind contributions from their Top 10 donors, the current rule requires Top 10 filers to constantly amend their Top 10 contributor lists as a result of receiving in-kind contributions from donors.

Establishing a \$10,000 minimum increment for amending Top 10 contributor lists will help ensure that Top 10 filers are not under a constant additional reporting obligation while also ensuring that the public remains informed of significant contributions that affect Top 10 disclosure. In this context, it is important to keep in mind that Top 10 filers are already subject to 24-hour reporting for contributions of \$1,000 or more within the 90 days before the election. For this reason, adoption of our proposed rule change will not deprive the public of important or time-sensitive donor information since Top 10 filers are already required to comply with 24-hour disclosure within 90 days of the election.

Second, we request that the Commission eliminate the regulatory requirement that a Top 10 filer disclose the top two donors of \$50,000 or more to any recipient committee that appears on the committee's Top 10 contributor list. This requirement imposes a duty on Top 10 filers to research and disclose its donors' top two contributors when the Top 10 donor is also a recipient committee. Each time a Top 10 donor that is a recipient committee makes additional contributions, the Top 10 filer is required to research the donor's contributors again for purposes of determining whether the donor's top two donors are still the same. Since the Top 10 filer does not have access to a donor's contributor information, this process involves researching the prior 12 months of a donor's publicly disclosed campaign reports on Cal-Access each time a Top 10 donor makes additional contributions.

It is unclear why this disclosure obligation falls on the Top 10 filer who has no specialized or first-hand knowledge about its contributors' donors. Moreover, the disclosure obligation calls for a Top 10 filer to report information on reports even though it has no reason to know the information is accurate.

While this requirement was intended to address possible circumvention of disclosure by contributing to an intermediary (Top 10 contributor) rather than the Top 10 filer, the new

earmarking requirements in Gov. Code §85704 (Chapter 546, Statutes of 2017 (Assembly Bill 249) will already trigger additional disclosure requirements, rendering the top two donor requirement redundant. Finally, the burden of this disclosure requirement on Top 10 filers is significant and far outweighs its utility since any member of the public has the same access to contributor information as the Top 10 filer.

2. Request for Regulatory Changes to 24-Hour Reporting Requirements

We also request that the Commission make the following regulatory changes to the 24-hour reporting requirements.

- (a) Extend the filing deadline to the next business day for independent expenditures in the same way as currently permitted for in-kind contributions (Attachment 2)

Under FPPC Regulation 18116, anytime a campaign report is due on a weekend or holiday, the filing deadline is extended to the next regular business day. This deadline extension applies to all 24-hour late contribution reports except on the weekend immediately preceding an election. The deadline extension does not apply to 24-hour reports for independent expenditures. This means that within the 90 days before an election, all independent expenditures of \$1,000 or more are required to be disclosed on a Form 496 – Late Independent Expenditure Report within 24 hours, even if the report is due on a holiday or weekend.

We propose making the exception allowing a report to be filed on the next business day applicable to 24-hour independent expenditure reports in the same manner as the exception currently applies to 24-hour late contribution reports.

- (b) Allow committees to use the payroll date as the date an independent expenditure is “made” for staff time in the same way as currently permitted for in-kind contributions (Attachment 3)

An in-kind contribution of goods or services to a committee is “made” on the earliest of the following: (i) the date that funds are expended by the contributor for goods or services or (ii) the date the candidate or committee or their agents obtain possession or control of the goods or services or otherwise receive the benefit of the expenditure. (2 CCR §18421(f).) However, there is an exception to the general rule for reporting the making of an in-kind contribution of compensated staff time. For an in-kind contribution of compensated staff time, the in-kind contribution may be reported as having been made and received on the payroll date. (2 CCR §18423(c).) However, this exception only applies to payments for compensated staff time that are in-kind contributions. The exception does not apply to compensated staff time that constitutes a direct independent expenditure.

We request that Regulation 18423 be amended to allow a committee making an independent expenditure of compensated staff time to disclose the expenditure as being made on the payroll date in the same way that the rule currently applies to in-kind contributions of compensated staff time.

(c) Clarify that a contribution is required to be disclosed only once on a Form 496 or Form 497 (Attachments 4 and 5)

FPPC Regulation 18550 requires Form 496 – Late Independent Expenditure Reports to disclose all contributions of \$100 or more received by a committee making an independent expenditure if the contribution has not been disclosed previously on a Form 460 campaign report. Some committees, such as primarily formed committees, are also required to disclose contributions received of \$1,000 or more within 24 hours during the 90 days prior to an election on Form 497. Because the Form 496 and Form 497 both require a committee to disclose received contributions when they haven't been disclosed on a Form 460 campaign report, a single contribution may be required to be disclosed twice on 24-hour reports – once on a Form 497 and again on a Form 496. We propose that Regulations 18550 and 18425 be amended to clarify that a contribution is not required to be disclosed on a 24-hour independent expenditure report or a 24-hour late contribution report if it was previously disclosed on another report.

(d) Allow a 20 percent margin for 24-hour independent expenditure reporting in the same way as for 24-hour contribution reporting (Attachment 4)

Regulation 18425 provides that when the actual value of an in-kind contribution is not known at the time of filing, a good faith estimate of the value that will be contributed or received during the period is allowed. If the value of the in-kind contributions during the 24-hour period differs from the estimated amount by 20 percent or more, the estimated report must be amended within 24 hours from the time the candidate or committee knows that the estimated value is incorrect. An amendment of the 24-hour report for an estimated in-kind contribution is not required to be amended if the estimate is within 20 percent of the actual value. However, the exception to the reporting rules does not apply to estimated independent expenditures.

We request that Regulation 18550 be amended to allow committees making independent expenditures to make a good faith estimate of the expenditures when the exact value of the independent expenditures are not known at the time of the report. The proposed regulatory change specifies that the committee will not be required to amend its 24-hour report if the amount estimated is within 20 percent of the actual value of the independent expenditure.

The proposed amendment would not only be consistent with the current exception for in-kind contributions, but would also be in line with Commission staff's prior advice regarding reports required for independent expenditures made during the 16 days prior to an election. In *Pessner* Advice Letter, No. I-89-346, staff advised that late independent expenditures "could be estimated and disclosed on a single Late Independent Expenditure Report in the same manner that the Commission staff permitted estimated Late Contribution Reports for non-monetary contributions of an ongoing nature." While the reporting requirement for both late contributions and late independent expenditures were later extended to 90 days, staff subsequently advised that use of good faith estimates was limited to 90-day late contribution reports and did not apply to late independent expenditure estimates.

3. Request that Large Sign Disclaimers be 5% in Total Height

Campaign yard signs and billboards are fixtures in California politics. They are used by virtually all candidates and ballot measure campaigns. Whether a campaign is large or small, it usually includes some form of advertising using yard signs or other large advertisements. The reason is simple. This form of public advertising can be a relatively inexpensive way of effectively communicating with voters, who are increasingly bombarded with mail, electronic media, television, and radio advertisements. Though these signs are “large” by definition, if too much space is taken up by a legally required disclaimer, it limits the space that is available to carry a campaign message.

In January of 2018, AB 249, otherwise known as the Disclose Act, went into effect. Among other things, the law set forth specific requirements for disclaimers for yard signs, billboards and other large forms of printed advertisements. In interpreting the Disclose Act requirements for large signs, FPPC staff has stated that the law requires *each line* of the required disclaimer to be at least 5% of the height of the sign. This interpretation has even made its way into the most recently adopted set of FPPC manuals.¹

Requiring that each line of these disclaimers be 5% in height has led to signs with unreasonably large and distracting disclaimers that take up a significant portion of committees’ advertisements, thereby inhibiting their ability to effectively communicate their campaign messages. Other committees have simply chosen to ignore this interpretation rather than have an absurd result.

Government Code Section 84504.2 sets forth the disclaimer requirements for large signs:

Notwithstanding paragraphs (2) and (4) of subdivision (a), the disclosures required by Sections 84502 [“paid for by”], 84503 [“committee major funding from”], and 84506.5 [“not authorized by”] on a printed advertisement that is larger than those designed to be individually distributed, including, but not limited to, yard signs or billboards, shall be in Arial equivalent type with a total height of at least five percent of the height of the advertisement, and printed on a solid background with sufficient contrast that is easily readable by the average viewer. The text may be adjusted so it does not appear on separate horizontal lines, with the top contributors separated by a comma.

(Cal. Gov. §84504.2(b) (emphasis added).)

The statute clearly sets forth that the “total height” of the disclosures must be 5% of the height of the sign. In sharp contrast to the requirement for large signs is the manner in which the requirement for video disclaimers was worded by the Disclose Act:

¹ The original draft manuals circulated to the public for review did not have clear language regarding the 5% line height for large signs. Revised versions of the manuals were adopted by the Commission at its August 16, 2018 meeting after a staff memo detailing the change was circulated on August 15, 2018 – the day before the meeting. (Copies of the relevant pages are enclosed.)

The written disclosure required by subdivision (a) shall appear on a solid black background on the entire bottom one-third of the television or video display screen, or bottom one-fourth of the screen if the committee does not have or is otherwise not required to list top contributors, and shall be in a contrasting color in Arial equivalent type, and the type size for the smallest letters in the written disclosure shall be 4 percent of the height of the television or video display screen. The top contributors, if any, shall each be disclosed on a separate horizontal line, in descending order, beginning with the top contributor who made the largest cumulative contributions on the first line. The name of each of the top contributors shall be centered horizontally. The written disclosures shall be underlined, except for the names of the top contributors, if any.

(Cal. Gov. §84504.1(b)(1) (emphasis added).)

Clearly, the drafters of the Disclose Act knew how to specify the size of type in advertising disclaimers. For video advertisements, they imposed a height requirement of 4% per letter, with a total disclaimer field of one-third of the screen (or one-quarter for a committee with no list of top contributors). In contrast, for large advertisements, they imposed a height requirement of 5% for the *total height* of the disclaimer.²

Because disclaimers tend to be long due to other requirements in the Act (e.g., sponsorship requirements, major funder identification, “not authorized by,” etc.), if each line of a large sign disclaimer is required to be 5% tall, then the disclaimer can easily take up an inordinately large portion of the sign and diminish a campaign’s space for its message. We have included examples where the 5% line height requirement has led to absurd results.

Common sense demands that the plain meaning of Section 84504.2(b) be adhered to – “disclosures . . . shall be in Arial equivalent type with a total height of at least five percent of the height of the advertisement.” If the present view of this language is not corrected, it will indefinitely curb political speech on large signs in future California elections.

Finally, the United States Constitution guarantees the right of political speech. While, the government has a limited ability to regulate political speech, series of United States Supreme Cases, including *Buckley v. Valeo*, has applied an “exacting scrutiny” standard for judicial review of disclosure laws, which are presumed to impose “significant encroachments on First Amendment rights.” (*Buckley v. Valeo* (1976) 424 U.S. 1, 73.) Laws and regulations that provide for disclosures that, in essence, prevent the underlying speech itself, fail to meet this standard.

We appreciate the Commission’s consideration of these proposed regulatory changes. Please do not hesitate to contact me if you have questions or wish to discuss these matters further.

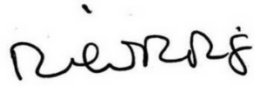
² It is important to note that video disclaimers are only required for a small portion of the total time of a video ad. Due to the nature of signs, the disclaimers are present at all times on signs – and, therefore, compete with the message during the entirety of the communication.

FAIR POLITICAL PRACTICES COMMISSION

APRIL 1, 2019

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Very truly yours,



RICHARD R. RIOS

OLSON HAGEL & FISHBURN LLP

on behalf of the California Political Attorneys Association (CPAA)

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ATTACHMENT 1
PROPOSED AMENDMENTS TO REGULATION 18422.5

§ 18422.5. Top Contributor Disclosure by Committees Primarily Formed for State Ballot Measures or Candidates.

(a) Submitting Contributor List to Commission.

(1) Under Section 84223(a), a committee primarily formed to support or oppose a state ballot measure or to make independent expenditures on a state candidate that raises \$1,000,000 or more for an election must maintain and submit a list of its top 10 contributors to the Commission. A committee must submit its list to the Commission by electronic mail, including its committee identification number in the subject line of the message.

(2) The list of a committee's top 10 contributors must disclose the information required by Section 84223(b) on a form prescribed by the Commission, or in a substantially similar format or spreadsheet approved by the Executive Director. The committee must identify the state candidate(s) or ballot measure(s) it is primarily formed to support or oppose. And the top 10 list must identify whether a contributor is a recipient committee or major donor, and the recipient committee or major donor's committee identification number, if applicable.

(3) A committee must submit an updated list of its top 10 contributors to the Commission if a new contributor qualifies, an existing top contributor makes additional contributions of \$10,000 or more, or a change occurs in the relative ranking of the contributors, as specified in Section 84223(c)(2), and when a reporting committee changes its name to add or delete a ballot measure or candidate.

(4) During the 16-day period before the election, a committee must submit the list within two business days of meeting the requirements in Section 84223(a) or a change in top contributor information or reporting committee name as specified in paragraph (3), above. Outside this time 2 period, a committee must submit the list within three business days of meeting the requirements in Section 84223(a) or a change in the top contributor information or committee name as specified in paragraph (3), above.

~~(5) If a committee lists a state recipient committee on its top 10 contributors list, it must provide the names of the top two contributors of \$50,000 or more to the state recipient committee unless the state recipient committee has independently submitted a report under Section 84223 for the same election. A committee is only required to update the top two contributors to a state recipient committee under this subdivision if the state recipient committee makes an additional contribution to the committee.~~

~~(A) For purposes of this subdivision, the top two contributors to the state recipient committee may be determined by reference to campaign reports available online from the Secretary of State's Cal Access System.~~

~~(B) A committee, which has filed within the applicable deadlines, is considered to have complied with this subdivision if the committee makes reasonable efforts to disclose the top two contributors to the state recipient committee based upon the following criteria:~~

~~(i) Top contributors are determined for the Cal Access two-year election period.~~

~~(ii) Top contributors are determined at the time the report is filed by aggregating contributions from the same source as reported by the state recipient committee on Cal Access as “Contributions Received” (contributions reported on Form 460) and “Late and \$5000+ Contributions Received” (contributions reported on Form 497).~~

(b) Commission Posting Lists.

(1) With respect to the top contributor lists provided by a committee to the Commission under Section 84223(a)-(d), the Commission will post or update the top ten contributor list within the time frames specified in Section 84223(c)(4).

(2) With respect to the list of top contributors supporting or opposing a state ballot measure under Section 84223(e), the Commission will make the list of top contributors supporting or opposing a state ballot measure using the top contributor lists provided by committees pursuant to Section 84223(a)-(d). The Commission will state on its website the methodology used in compiling the state ballot measure top contributor lists, and post and update the lists as timely as practicable.

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ATTACHMENT 2
PROPOSED AMENDMENT TO REGULATION 18116

§ 18116. Reports and Statements; Filing Dates.

(a) Except as set forth in subdivision (b), whenever the Political Reform Act requires that a statement or report be filed prior to or not later than a specified date or during or within a specified period, and the deadline falls on a Saturday, Sunday, or official state holiday, the filing deadline for such a statement or report shall be extended to the next regular business day.

(b) This extension does not apply to any of the following:

(1) Contribution reports required by Sections 84203, 84203.3(b), or 85309 or notice by the contributor of a late in-kind contribution required by Section 84203.3(a) when the due date for these types of reports falls on a Saturday, Sunday, or official state holiday immediately prior to an election.

(2) Independent expenditure reports required by Sections 84204 or 85500 when the due date falls on a Saturday, Sunday, or official state holiday immediately prior to an election.

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ATTACHMENT 3
PROPOSED AMENDMENTS TO REGULATION 18423

§ 18423. Payments for Personal Services as Contributions and Expenditures.

(a) The payment of salary, reimbursement for personal expenses, or other compensation by an employer to an employee who spends more than 10% of his or her compensated time in any one month rendering services for political purposes is a contribution, as defined in Section 82015 and Regulation 18215, or an expenditure, as defined in Section 82025, by the employer if:

(1) The employee renders services at the request or direction of the employer; or

(2) The employee, with consent of the employer, is relieved of any normal working responsibilities related to his or her employment in order to render the personal services, unless the employee engages in political activity on bona fide, although compensable, vacation time or pursuant to a uniform policy allowing employees to engage in political activity.

(b) Personal services are rendered for political purposes if they are carried on for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of one or more candidates, or the qualification or passage of any measure, and include but are not limited to:

(1) Personal services received by or made at the behest of a candidate or committee by an employee; and

(2) Hours spent developing or distributing communications that expressly advocate the election or defeat of a clearly identified candidate or the qualification, passage or defeat of a clearly identified measure.

(c) The amount of the contribution or expenditure reportable pursuant to this regulation is the pro-rata portion of the gross salary, reimbursement for personal expenses or compensation attributable to the time spent on political activity. An in-kind contribution or independent expenditure of ~~the~~ services of salaried personnel to a committee and the expenditure by the person making the salary payment are considered to be made on the payroll date of the salaried personnel.

(d) This regulation does not affect the obligation of an employer or any other person to report expenditures and contributions other than the salary, reimbursement for personal expenses, or compensation for personal services of an employee.

(e) Notwithstanding the provisions of subsection (a), salary, reimbursement for personal expenses and compensation paid to an employee by an employer who has contracted to provide services to a candidate or committee are not contributions or expenditures by the employer, provided that the services rendered by the employee are not beyond the scope of the contract.

This paragraph does not affect any reporting obligation imposed by Section 84303.

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ATTACHMENT 4
PROPOSED AMENDMENT TO REGULATION 18550

§ 18550. 24-Hour Independent Expenditure Reports.

(a) Application. This regulation applies to 24-hour independent expenditure reports filed pursuant to Sections 84204 and 85500.

(b) Report Contents. In addition to the information specified in Section 84204, a report filed pursuant to Sections 84204 or 85500 must contain the following information:

(1) The name and address of the filer and, if applicable, the filer's identification number issued by the Secretary of State.

(2) Date of the filing.

(3) Identification of amended information.

(4) The date of each expenditure.

(5) A description of each expenditure.

(6) The amount of each expenditure.

(7) The cumulative-to-date total the committee has expended for independent expenditures relating to a candidate or measure. A filer amending 24-hour independent expenditure reports shall ensure that the cumulative-to-date total for a candidate or measure is accurate on the most recent report filed, but is not obligated to amend the cumulative amount on previous reports.

(8) If the expenditure was in connection to a candidate, the candidate's name, the office sought or held and, if applicable, district number. In addition, the report must identify whether the expenditure was made to support or oppose the candidate.

(9) If the expenditure was made in connection with a ballot measure, the ballot measure's name, including its number or letter, and the jurisdiction. In addition, the report must identify whether the expenditure was made to support or oppose the ballot measure.

(c) If the filer is a recipient committee formed pursuant to Section 82013, the filer must disclose contributions of \$100 or more received after the closing date of the last campaign statement through the date of the independent expenditure unless the filer has already disclosed the contribution on another report required to be filed under the Act. If no previous campaign statement has been filed, disclose such contributions received since January 1 of the current calendar year. Also include the following information:

(1) The full name and address of each contributor and the contributor's identification code. If the contributor is an individual, his or her occupation and employer.

(2) The date and amount of the contribution.

(3) The interest rate if the contribution is a loan.

(d) With respect to 24-hour independent expenditure reports filed under Section 85500, the “election” referred to in Section 85204 means a state election where the candidate or measure in connection with which the independent expenditure was made will be listed on the ballot.

(e) If a candidate or committee does not know the actual value of an independent expenditure at the time of filing, it may, on or before the deadline specified in Sections 84204 and 85500, disclose a good faith estimate of the value that will be spent during the period. If the value of independent expenditures during the 24-hour reporting period differs from the estimated amount by 20 percent or more, the estimated report must be amended within 24 hours from the time the candidate or committee knows that the estimated value is incorrect.

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ATTACHMENT 5
PROPOSED AMENDMENT TO REGULATION 18425

§ 18425. 24-Hour Contribution Reports.

(a) Application. This regulation applies to 24-hour contribution reports filed pursuant to Sections 84203 and 85309.

(b) Report Contents. In addition to the information specified in Section 84203, a report filed pursuant to Section 84203 or 85309 must contain the following information:

(1) The name and address of the filer, and if applicable, the filer's identification number issued by the Secretary of State.

(2) Date of the filing.

(3) Identification of amended information.

(4) The date the contribution was received.

(5) The full name and address of the contributor and the contributor's identification code. If the contributor is an individual, his or her occupation and employer.

(6) The amount of the contribution.

(c) Non-Monetary Contributions.

(1) Timely Filed. Consistent with Section 84203.3, a report filed by the recipient of a non-monetary contribution during the reporting periods of Section 82036 or 85309 shall be deemed timely filed if it is received by the filing officer within 48 hours of the time the contribution is made.

(2) Estimating. When more than one non-monetary contribution will be made by or received from a single contributor during the 24-hour contribution reporting period, a candidate or committee may, on or before the deadline specified in Section 84203, 84203.3 or 85309, file a single 24-hour contribution report covering the entire 24-hour contribution reporting period disclosing:

(A) The total value of non-monetary contributions that will be made by or received from the contributor during the period; or

(B) If the actual value of non-monetary contributions is not known at the time of filing, a good faith estimate of the value that will be contributed or received during the period. If the value of non-monetary contributions during the 24-hour reporting period differs from the estimated amount by 20 percent or more, the estimated report must be amended within 24 hours from the time the candidate or committee knows that the estimated value is incorrect.

(3) On the candidate or committee's next campaign statement filed pursuant to Section 84200, 84200.5, 84202.3 or 84202.7, the actual value of all non-monetary contributions during the period covered by the statement shall be disclosed.

(d) With respect to 24-hour contribution reports filed under Section 85309, the “election” referred to in Section 85204 means a state election where the candidate or measure for which the contribution was received will be listed on the ballot.

(e) The report required pursuant to Sections 84203 or 85309 is not required to be filed by a committee that has timely disclosed the late contribution pursuant Sections 84204 or 85500 filed with the filing officer with whom the committee is required to file the original of its campaign reports pursuant to Section 84215.

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JONES

PLEASANTVILLE CITY COUNCIL

PAID FOR BY CITIZENS FOR GOOD GOVERNMENT, SUPPORTING
JONES, SMITH, AND BROWN FOR CITY COUNCIL 2018

Committee major funding from Acme Holdings and affiliates.
Not authorized by a candidate or a committee controlled by a candidate.



VOTE

PAUL JONES

PLEASANTVILLE CITY COUNCIL

PAID FOR BY CITIZENS FOR GOOD GOVERNMENT,
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Committee major funding from Acme Holdings and affiliates.
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