From: Joseph A. Guardarrama [mailto:jguard@kaufmanlegalgroup.com]
Sent: Tuesday, July 15, 2014 3:58 PM
To: Zackery Morazzini; Hyla Wagner
Cc: Erin Peth; Jason Kaune (JKaune@nmgovlaw.com)
Subject: SB 27 Regulations - Additional Comments

Zack and Hyla:

On behalf of the California Political Attorneys Association's Regulatory Committee we would like to thank you for considering our original comments submitted in June. In response to your most recent drafts of the SB 27 regulations, we are providing you with the following additional comments:

(1) Regulation 18422(e)(3) – We believe that a 24-hour expedited filing schedule for donors who may have just learned of their status as filers under California law during the last 16 days before an election would be impossible to comply with. New filers need more time to obtain counsel or obtain advice. We suggest giving donors at least 48 hours to file in an expedited manner, which will still provide rapid information to the public. We further suggest that the regulation explain what having "reason to know" and "being otherwise being put on notice" are intended to mean. Simply having a donor appear on a campaign statement should not be enough to qualify under those standards.

(2) Regulation 18422.5(a)(2) – We reiterate our suggestion to strike the last sentence for two reasons: (1) the burden to determine the current status of a donor (i.e., recipient committee versus major donor) should not be on a recipient, and (2) the date of contributions is already contained in other disclosure filings and would be duplicative.

We appreciate the opportunity to comment on these regulations and we are available to answer any questions that you may have.

Thank you.

Joe

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