



**MEMORANDUM**

TO: Chair Remke and Commissioners Casher, Eskovitz, Wasserman, and Wynne

FROM: Lynda Cassady, Chief Technical Assistance Division

DATE: January 2, 2015

RE: Campaign Educational Resources:

- Campaign Manuals for Slate Mailer Organizations, General Purpose Recipient Committees, Major Donors and Independent Expenditure Committees.
- Form 511 – Paid Spokesperson Report.

Staff requests approval of four campaign manuals and an amendment to Form 511 (Paid Spokesperson Report). The materials have been posted on the FPPC website for comments. Changes made prior to the public comment period are indicated in “yellow” and changes made since the materials were posted are indicated in “green.”

**General Purpose Recipient Committees (Manual 4):** This manual was initially ready for Commission approval this summer. However, with the passage of SB 27, a new chapter for multipurpose organizations and their reporting requirements was required and each chapter was reviewed and revised where necessary.

**Major Donor Committees (Manual 5):** SB 27 changes were incorporated.

**Independent Expenditure Committees (Manual 6):** Campaign Disclosure Manual 6 has also been updated to reflect the changes made by SB 27 in Chapter 1. In addition, Chapter 4, which described an event-based reporting option for multipurpose organizations, has been deleted. Event-based reporting was a streamlined reporting option under Regulation 18413 for use by nonprofit 501(c)(3) and 501(c)(4) organizations making occasional independent expenditures from general treasury funds. However, the Legal Division has determined that the streamlined reporting requirements for multipurpose organizations pursuant to SB 27 supersede the event-based reporting option. Regulation 18413 will be brought to the Commission for repeal at a future Commission meeting.

**Slate Mailer Organizations (Manual 7):** The draft Campaign Disclosure Manual 7 is a new manual for slate mailer organizations. The manual includes information about the disclaimer requirements, as well as illustrations on how to complete FPPC reporting forms.

**Paid Spokesperson Reporting (Form 511):** Section 84511 was recently amended by Assembly Bill 510 (Ammiano) – Chapter 868, Statutes of 2014, effective January 1, 2015. Pursuant to the changes, a committee that makes an expenditure of *any amount* to an individual for his or her appearance in a ballot measure advertisement that states or suggests that the individual is a member of an occupation

that requires licensure as a prerequisite to engage in that occupation must also file the Form 511 within ten days. The form and instructions were revised to address the new reporting requirement. In addition, if the Commission approves the amendment to Regulation 18450.11, the following sentence will be added to the campaign manuals so that treasurers are aware of the timeliness for providing documentation to an enforcement agency: *Upon an FPPC request, documentation of an individual's occupation must be provided by electronic means within 24 hours.*

I would like to acknowledge Tara Stock, Political Reform Consultant II, as the author of the technical writing. She has done a praiseworthy job in preparing user-friendly educational guides that encompass over 60 statutes and 50 regulations relating to campaign reporting. I ask for your approval of the materials.