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March 13, 2012

Chair Ravel and Commissioners Escovitz, Garrett, Montgomery, and Rotunda
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, CA 95814

RE: Agenda Item #42: Adoption of Regulation 18215.3: Behested Payment Reporting

Chair Ravel and Commissioners,

On behalf of California Common Cause and our 400,000 national members, please accept this letter regarding Agenda Item #42 on the proposed regulations to behested payment reporting.

The proposed regulations to §18215.3 is a stark improvement and much more detailed proposal compared to the prior version reviewed during the September 22, 2011 meeting; and for that reason we believe Mr. Morazzini and Ms. Rowan deserve credit for their hard work in getting to this point and for allowing the public to express their concerns with behested payments.

California Common Cause supports the proposal and urges the Commission to approve the regulations.

Additionally, California Common Cause also requests the Commission increase their vigilance towards the financial interactions between non-profits and elected officials. The anecdotal evidence we have been able to gather confirms voter suspicions that behested payments are just as influential, if not more, as direct contributions. Wealthy interests who seek to influence public policy are commonly presented with a "menu" of account options that include donations to non-profit organizations connected to the official or official's family. Many of these relationships were reported by the Sacramento Bee on March 12, 2012 ("California lawmakers collect money without limits for personal causes"). These corrupting transactions should be limited and disclosed to the same degree as direct contributions.

Californians have a high expectation that the Commission will continue to be one step ahead of special interest influence. For those reasons, we look forward to partnering with you on these important issues.

Please contact me at (916) 520-4070 or pung@commoncause.org if you have any questions.

Sincerely,

Phillip Ung
Policy Advocate