

Item #22 – General Item

Amendment of Regulation 18422, Multipurpose Organization Political Activity Transparency and Adoption of Regulation 18422.1, Multipurpose Organization Recordkeeping. Staff: Dave Bainbridge, General Counsel; Sukhi Brar, Supervising Attorney; and Toren Lewis, Commission Counsel, Legal Division. Staff proposes amendments to Regulation 18422 and adoption of new Regulation 18422.1 to clarify the reporting and recordkeeping requirements for multipurpose organizations. The proposed amendments and regulation were presented for pre-notice discussion and direction at the July 2019 meeting, and are now presented for adoption.

Trent Lange

1. California Clean Money Campaign appreciates what the Commission is doing with the new SB 27 regulations to ensure that non-profits must comply have to follow the same rules for contributions as committees do.

Our one concern is 18422.1(a)(1)(A). The concern is that non-profits will have a mix of donations that qualify as contributions under this regulation, and regular donations that do not qualify for contributions. Actually keeping such a “continuous computation of reportable fund balances...” of donations that count as “contributions” separate from other donations could be very burdensome.

We would ask that it be amended to change from “must contain a continuous computation...” to something like “allow creation of a continuous computation...”. That would ensure that it could be produced if required for an audit, etc, without requiring the burden of actually maintaining such a computation separate from other donations.

Thank you.

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