

Julianna Contreras

From: andy@rockaslaw.com
Sent: Wednesday, October 18, 2023 11:12 AM
To: CommAsst
Subject: Comment: FPPC's 10/19/23 Meeting, Agenda Item 5

EXTERNAL EMAIL

Dear FPPC Commissioners and Staff,

I write today to respectfully request that the FPPC delay the effective date of proposed amended Regulation 18410.

I specifically want to draw the FPPC's attention to the proposed new requirement in subdivision (a)(7) that (currently scheduled to be effective on Jan. 1, 2024) a newly-proposed Form 410 would have to contain "the names of persons, other than the treasurer, who are authorized to obtain the bank records of the committee from the financial institution where the campaign bank account is maintained"

I understand the desire of our State's auditors to obtain and utilize information that will allow them to more efficiently pursue their mission under the Political Reform Act. However, requiring tens of thousands of political committees, to provide worldwide internet-accessible disclosure of financially relevant information (which will invariably increase the incidence of campaign account fraud and theft), seems an overly-broad method by which to get the desired information (which is desired in only a handful of audits) to a handful of campaign finance auditors.

I therefore urge the FPPC to delay the effective date of the amended regulation. I believe that we first need adequate safeguards in place (e.g., at a minimum - redaction requirements) before making these proposed regulatory changes effective.

Thank you for your time and consideration.

Sincerely,
Andy Rockas

(Note: This comment is not submitted on behalf of any client or other party.)

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