
Written Comment on Proposed Regulation 18430.1

From Michael Farr <Michael@politicallaw.com>

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To CommAsst <CommAsst@fppc.ca.gov>

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EXTERNAL EMAIL

Dear Commissioners –

Proposed Regulation 18430.1 seeks to prohibit a committee's purchase and use of gifts cards of \$100 or more. While well intentioned to close a loophole in lack of expenditure disclosure, the proposed regulation is broad enough to limit a general-purpose recipient committees' ability to use gift cards as a mechanism for fundraising. For example, gift cards are a convenient way to offer an incentive for local chapters assisting with the fundraising goals of its statewide chapter. A donor's ability to in-kind a gift card to a committee to use as a prize at a fundraiser would also be limited, since a committee would be prohibited from its usage. In these regards, gift cards operate no different than swag items.

Expenditure disclosure isn't of value to the public when using gift cards for these purposes. This proposed regulation offers a carve out exception for a candidate's staff, but not a carve out for a legitimate tool used by committees to assist their fundraising efforts.

I would request the Commission consider additional exceptions to this gift card prohibition so that committees may continue using gift cards as a fundraising mechanism.

Thank you for your time and consideration.

Michael

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