

MEMORANDUM

To: Chair Ravel, Commissioners Casher, Eskovitz, Wasserman, and Wynne

From: Lynda Cassady, Chief, Technical Assistance Division

Subject: Approval of Campaign Manual 5- Major Donor Committees

Date: September 5, 2013

Attached for Commission approval is Campaign Manual 5; the campaign reporting manual for Major Donor Committees. A major donor committee is an individual or business entity that makes contributions of \$10,000 or more in connection with state or local candidates, measures or committees.

Background:

Over the last several years there has been a significant amount of changes, statutory and regulatory, related to campaign disclosure rules. Staff devoted its time to preparing fact sheets, charts and instructional pages for the campaign forms so that the information is available to the public as soon as possible. Unfortunately, the campaign manual revisions were delayed because of the many changes, preparation of election reports; furloughs, special elections, preparation of electronic filing programs and other demands.

It is my goal to update all the manuals for the 2014 election season. It is more helpful to citizens and committees to use one document for reporting advice. It provides greater consistency in reporting among committees and provides those without the resources to hire professionals an easy to understand instructional guide.

The challenge is that campaign rules have become more complex and those making political expenditures in California elections are more varied and diverse than ever before. Campaign reporting is also a unique and specialized field. It takes a full election cycle to train staff and campaigns have different reporting issues than ten years ago. In addition, there are more committees making independent expenditures than ever before and more are active in multiple jurisdictions. Significant changes include more itemization requirements and mandated advertisement disclaimers.

It is my goal that this manual and those that follow provide accurate and detailed reporting advice and address the many new issues since the last publications. The writing format is such that it can be easily read in an electronic format and understood by an individual that is a first time participant in a campaign without the resources to hire professional help.

Campaign Manual 5 - Major Donor Committees

The proposed Manual 5 was available for public comment in May and again in August. Enforcement staff, political attorneys and others provided detailed suggestions and many were incorporated. The advice provided on FPPC regulation 18227.5, the regulation that defines where a committee should file reports, generated the most comments.

The advice contained in Chapter 4 has been approved by the legal division. It provides that a major donor that makes a state contribution may immediately begin filing with the Secretary of State or may do so at

the end of the calendar quarter. This advice is consistent with the Commission's goal of having more committees file at the Secretary of State and recognizes that there are some committees that state it would be too burdensome to change jurisdictions during a calendar quarter. In 2013 we had many advice requests on where to file because major donors were making significant contributions in connection with local elections; particularly Los Angeles and San Diego.

Approval Request:

I ask for your approval. Once adopted, the manual will undergo another technical review for spelling and appropriate page references and links will be posted so that it can be viewed in full or by individual chapters.