



May 17, 2019

The Honorable Pro Tempore Toni Atkins
California State Senate
State Capitol, Room 205
Sacramento, CA 95814

The Honorable Speaker Anthony Rendon
California State Assembly
State Capitol, Room 219
Sacramento, A 95814

Dear President pro Tempore Atkins and Speaker Rendon:

The Secretary of State and the Fair Political Practices Commission jointly request urgency legislation extending the legislatively-imposed implementation date of the Cal-Access Replacement System (CARS) from December 31, 2019 to February 1, 2021. The Secretary of State serves as the state's filing officer for the California Political Reform Act (Act). The Fair Political Practices Commission enforces the provisions of the Act to ensure compliance, adopts and modifies forms, administers regulations, and provides training and advice to the diverse community subject to the Act.

Recently, software vendors, campaign and lobbying treasurers and attorneys, and other stakeholders have expressed significant concerns with the implementation timeline for CARS. The current CARS deadline was established by the Legislature when the state's primary election was scheduled for June. Recent legislation has moved the state's primary to March. Consequently, the CARS deadline now occurs during an essential mandatory filing period for candidates and committees involved in the March 2020 Presidential Primary Election. The Act requires mandatory 24-hour reporting for certain campaign activity occurring within 90-days of a state or local election. The 90-day period commences December 4, 2019. Implementing and certifying the CARS Project during that period could cause significant public confusion, inadvertent non-compliance, insufficient time for filers to understand the new system, and redirect important state resources that could otherwise be used on legitimate campaign compliance issues. Lastly, there is minimal downside to extending the deadline as the existing CAL-ACCESS will continue to be online during the upcoming elections.

Thank you for your consideration of this important and timely request. Please have your staff contact Deputy Secretary of State for Legislative Affairs, Tiffany Mok, at (916) 695-1686 or the Commission's Director of Legislation and External Affairs, Phillip Ung, at (916) 322-7635 to schedule a briefing.

Sincerely,

Alex Padilla
Secretary of State

Richard C. Miadich
Chair, Fair Political Practices Commission