

Digital Transparency Task Force Enforcement



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Challenges

Investigation

- Constantly changing ads
- Disorganized production of advertising records
- Determining font size of electronic ads
- Proxy purchasers of website domain names

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Challenges

Prosecution

- New advertisement types
- “Overdisclosure”

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Potential Improvements to Current Law

Recordkeeping/Archive

- Recordkeeping requirements
- Types of Records
- Application – (Reg. 18450.2(a)(3))
- Complete Records
- Electronic ads include FPPC as a recipient

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Potential Improvements to Current Law

Source Confirmation

- Websites required to confirm identity of purchaser, or at least gather additional identifying information

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Conclusion