



Outlook

FW: Question regarding Regulations 18430.1, 18421.3, 18401

From Zachary Norton <ZNorton@fppc.ca.gov>

Date Wed 11/12/2025 2:23 PM

To Davina Vo <davo@fppc.ca.gov>

 4 attachments (979 KB)

18401 (amended 6-24-22) (Proposed CPAA Amendments)(2121522.1).pdf; Proposed Adopt 18430.1 (Proposed CPAA Amendments)(2121521.1).pdf; 18421.9 (Proposed CPAA Amendments)(2121523.1).pdf; 18431.Reporting-of-Expenditures-by-an-Agent-or-Independent-Contractor (Proposed CPAA Amendments)(2121520.1).pdf;

Hi Davina,

I received this public comment on my regulation project.

Thanks,

Zak

From: KC Jenkins <kcjenkins@bmhlaw.com>

Sent: Thursday, November 06, 2025 5:09 PM

To: Zachary Norton <ZNorton@fppc.ca.gov>

Subject: RE: Question regarding Regulations 18430.1, 18421.3, 18401

EXTERNAL EMAIL

Hi Zak:

On behalf of CPAA, and as a follow-up to our comment back at the August Commission meeting on Regulations 18430.1, 18421.3, and 18401, please see attached for some suggested regulatory language to use as you bring these regulations up again.

We've also sent some suggestions to amend the regulations on subvendor reporting, to clarify that subvendors for prepaid cards would have to be reported at \$100 like for credit cards. Those are the attached Regulations 18421.9 and 18431, if you'd like to consider them.

Thank you for your time and work you've put in on these. If you'd like to discuss further, please let me know, we are happy to do that.

KC Jenkins
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From: Dave Bainbridge <DBainbridge@fppc.ca.gov>
Sent: Wednesday, September 10, 2025 10:00 AM
To: KC Jenkins <kcjenkins@bmhlaw.com>
Cc: Adam Silver <asilver@fppc.ca.gov>; Zachary Norton <ZNorton@fppc.ca.gov>
Subject: RE: Question regarding Regulations 18430.1, 18421.3, 18401

Hi KC,

We're gathering information on PEX-style expenditure accounts and plan to present that information, as well as optional regulatory language, to the Commission in October or November. If you have information or suggestions you'd like to provide, please send it to Zak Norton. As always with these things, sooner is better than later.

Dave Bainbridge
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From: KC Jenkins <kcjenkins@bmhlaw.com>
Sent: Tuesday, September 9, 2025 5:24 PM
To: Dave Bainbridge <DBainbridge@fppc.ca.gov>
Cc: Adam Silver <asilver@fppc.ca.gov>
Subject: Question regarding Regulations 18430.1, 18421.3, 18401

EXTERNAL EMAIL

Hi Dave:

I hope you are having a good week. Since the Commission took no action on the adoption of proposed Regulation 18430.1 and the amendments to Regulations 18421.3 and 18401 at last month's meeting (on prepaid debit cards), I wanted to ask about the plan and timing on these regulations going forward. Does the Commission or staff have a plan in mind on when to bring these to the Commission again?

Thank you in advance for your response. CPAA looks forward to engaging with FPPC staff as further changes to the Regulations are considered.

Have a good evening.

KC Jenkins
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