



California Political Attorneys Association

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February 5, 2018

Chair Jodi Remke
Commissioner Maria Audero
Commissioner Frank Cardenas
Commissioner Brian Hatch
Commissioner Allison Hayward
Fair Political Practices Commission
1102 Q Street, Suite 3000
Sacramento, CA 95814

RE: **Item 22 – February 15, 2018 Commission Meeting – Enforcement Procedures**

Dear Commissioners Remke, Audero, Cardenas, Hatch, and Hayward:

The Executive Committee of the California Political Attorneys Association (“CPAA”) writes to you in support of the recent calls for a review and possible update of FPPC enforcement priorities and procedures. We specifically welcome Item 22 on the Commission’s February 15th meeting agenda as, what we hope will be, a first step in reopening the dialogue between our organization and the FPPC on this important topic.

As practitioners of the political law bar who serve the needs of clients operating under the FPPC’s jurisdiction, we believe that such a review will benefit the public generally, as well as those engaged in the political process. Some examples of specific areas CPAA believes could improve as a result of this review are: the policies for determining when a warning, advisory or closure letter is issued, the complaint review and investigative initiation process, the policies regarding interaction with the Legal Division on issuing advice, the state of streamlined enforcement policies, the treatment of unrepresented parties, and default settlements.

CPAA lauds the FPPC’s willingness to examine its functions and priorities, so that it may become a better conditioned watchdog of political actors. We are eager to play a role in the process and are optimistic about the results for all involved. We believe that such review will allow the FPPC to continue to operate consistent with the principles of good government and transparency that Commissioners and the Enforcement Division espouse to the broader community.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Joseph A. Guardarrama', is written over a circular scribble.

Joseph A. Guardarrama
CPAA President