

## 22. Legislative Update.

Staff: Lindsey Nakano, Senior FPPC Legislative Counsel. The Commission will review and discuss potential sponsored and other legislation. The Commission will provide direction on future legislation to be sought by the agency.

Legislative Update

### 3. **Institute of Governmental Advocates (IGA)** says:

November 21, 2024 at 12:24 pm

Arguments in Opposition, Proposal #7 (continued & concluded):

Since the PRA's inception, mandatory audits of all candidates, committees, and others subject to the Act were part of the FTB's annual budget appropriation. No valid reason exists to transfer this role to another agency and charge those subject to the duty so transferred to fund the new newly created division of the FPPC.

We recommend and invite the FPPC convene with its regulated stakeholders to develop a more practical proposal.

### 2. **Institute of Governmental Advocates (IGA)** says:

November 21, 2024 at 12:23 pm

Arguments in Opposition, Proposal #7 (continued)

Leaving the audit function with FTB serves this important objective without the need for any regulation or policy. Second, to fund the creation of an "independent audit" division within the FPPC, will likely lead the FPPC to seek to charge lobbying firms and lobbyist employers for the audits it elects to undertake in addition to all current fees collected from these regulated entities. Thus, just for the privilege of engaging in constitutionally protected activity, the state will be charging increased fees that, in the past, ranged in the vicinity of \$600 (See, Cal. Const. Art. I, § 3).

### 1. **Institute of Governmental Advocates (IGA)** says:

November 21, 2024 at 12:20 pm

Arguments in Opposition, Proposal #7: The Institute of Governmental Advocates (IGA), writes in opposition to the proposal in Agenda Item 22, Proposal No. 7: IGA supports maintaining the FTB's role over the existing audit program, as the Political Reform Act originally required. There is no justification or need to transfer this duty to the FPPC, create a new division in the FPPC, and then fund the NEW staffing needed. Analyses of prior legislation on this point acknowledges that housing the audit program at the FPPC requires the Commission to "adopt regulations or policies to ensure the operational independence of audit personnel from enforcement operations under the [Political Reform Act]."

(continued in following submission)