

**EXECUTIVE BOARD
2010-2011**

RANDI JOHL, President, Lodi,
SHIRLEY CONCOLINO, 1st Vice-
President, Sacramento
JAMIE ANDERSON, 2nd Vice-
President, Yucca Valley
CYNTHIA VANWORMER,
Recording Secretary, Fort Bragg
LUCINDA WILLIAMS, Treasurer,
Brea
MITZI ORTIZ, Communications
Director, Lathrop
DAWN ABRAHAMSON, Legislative
Director, Fremont
JOANN TILTON, Professional
Development Director, Manteca
MARGARET WIMBERLY, Northern
Division Professional Development
Representative, Brentwood
DANA DAVIDSON, Central Division
Professional Development
Representative, Merced
PAT HAMMERS, Southern Division
Professional Development
Representative, Cathedral City
PATRICE OLDS, Northern Division
Trustee, Walnut Creek
NANCI LIMA, Central Division
Trustee, Lemoore
KIMBERLY RODRIGUES,
Southern Division Trustee, Agoura
Hills
LORRIE BREWER, Northern
Division Chair, Santa Cruz
LORI MARTIN, Central Division
Chair, Waterford
JUANA LAUR, Southern Division
Chair, Laguna Niguel
LISA POPE, Immediate Past
President, Malibu



RANDI JOHL, JD, MMC
PRESIDENT
City Clerks Association of California
League of California Cities – City Clerks Department
221 West Pine Street, Lodi, California 95240
(209) 333-6702 / (209) 333-6807 Facsimile
rjohl@lodi.gov

January 20, 2011

Charles Bell, Esq.
Bell, McAndrew and Hiltachk
455 Capitol Mall, Suite 801
Sacramento, California 95814

Robert M. Stern, President
Center for Governmental Studies
10951 Pico Boulevard, Suite 120
Los Angeles, California 90064

SUBJECT: FINAL RECOMMENDATIONS OF THE FPPC TASK FORCE

Dear Co-Chairs Bell and Stern:

On behalf of the City Clerks Association of California ("CCAC"), let me first congratulate you on the efforts of the FPPC Task Force in providing the final recommendations after an in-depth review of the specified subject areas of the Political Reform Act. The ability of the Task Force and its subcommittees to provide research, analysis and final recommendations in such a short period of time is truly remarkable.

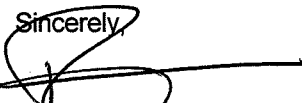
It is my absolute privilege to convey a position of general support for the final recommendations associated with electronic filing, state and local consistency, process simplification, increased disclosure and transparency, and raising the public confidence.

There are two sub-topics for which CCAC continues to express concern:

First, while CCAC supports in general the concept of a single electronic filing system for both state and local filings, we remain concerned about implementation and costs associated with this program. Based on the attached informal survey, completed through the City Clerks' listserv, it appears that currently 71% of the 481 cities provide no online access for campaign disclosure filings. We believe the phased approach of creating the IT and filing officer groups to analyze and provide recommendations regarding actual implementation and costs is prudent and much needed.

Second, CCAC opposes the sub-recommendation associated with quarterly filings. Currently, most cities have two filings on a non-election year and four or five filings on an election year. The proposed recommendation would increase the numbers to four filings on a non-election year and six or seven filings on an election year. Not only would this greatly increase the burden for local candidates and committees by way of their need to file more forms without an increase in activity, the recommendation also doubles the burden on local filing officers by way of notifications, tracking and amendment follow-up. For these reasons, CCAC opposes this particular sub-recommendation.

In conclusion, we thank the Task Force for their diligence and dedication. We are grateful to have had the opportunity to provide input into the process as local filing officers and public servants. Please feel free to contact me should you have any questions regarding the above.

Sincerely,

Randi Johl, JD, MMC
President

C: Dawn Abrahamson, City Clerk, City of Fremont
Natasha Karl, League of California Cities

FPPC SURVEY – ELECTRONIC FILING SYSTEMS

<u>Total Number of Cities:</u>	481
<u>Total Number of Cities Responding:</u>	116
<u>Percentage of Cities Responding:</u>	24% (Approximately ¼)

Of Those Responding:

Number of Cities – No Electronic Access:	83 (71%)
Number of Cities – PDF Scan and Upload:	22 (19%)
Number of Cities – Electronic Filing:	8 (7%)
Number of Cities – Both:	3 (3%)

Conclusions:

- Based upon almost ¼ of cities responding, this is a good sampling and representation of what electronic access, if any, is available through local agencies at the current time.
- If relying on these figures, it may be assumed that for all the cities in the State of California, 71% (342 cities) have no electronic access, 19% (91 cities) do a PDF Scan and Upload, 7% (34 cities) use an Electronic Filing System, and 3% (14 cities) do a PDF Scan and Upload and use an Electronic Filing System.

City	Online Access	System
Agoura Hills	No	
Aliso Viejo	No	
American Canyon	Yes	PDF Scan/Upload
Antioch	No	
Arroyo Grande	No	
Atascadero	Yes	PDF Scan/Upload
Atwater	No	
Bellflower	No	
Belmont	Yes	PDF Scan/Upload
Berkeley	Yes	Electronic Filing
Brawley	No	
Brentwood	Yes	PDF Scan/Upload
Camarillo	No	
Carmel	No	
CCCSD	No	
Chino	No	
Chula Vista	No	
Cypress	No	
Daly City	No	
Dana Point	Yes	PDF Scan/Upload
Duarte	No	
El Centro	No	
Emeryville	No	
Encinitas	Yes	Electronic Filing
Eureka	No	
Fairfax	No	
Fort Bragg	No	
Fortuna	No	
Fremont	No	
Galt	No	
Garden Grove	No	
Gilroy	Yes	Electronic Filing
Glendale	Yes	PDF Scan/Upload
Grover Beach	No	
Healdsburg	Yes	PDF Scan/Upload
Hollister	No	
Huntington Beach	Yes	Both
La Palma	No	
Laguna Hills	No	
Lake Forest	Yes	PDF Scan/Upload
Lancaster	Yes	PDF Scan/Upload
Lathrop	No	
Lawndale	No	
Lemoore	No	
Livermore	No	
Lodi	Yes	PDF Scan/Upload
Loma Linda	Yes	PDF Scan/Upload
Los Alamitos	No	
Los Altos	No	
Los Banos	No	

Manteca	No	
Martinez	No	
Marysville	No	
Merced	Yes	Both
Millbrae	No	
Milpitas	Yes	PDF Scan/Upload
Mission Viejo	Yes	Both
Monrovia	No	
Monterey	No	
Morgan Hill	No	
Mt. Shasta	No	
Murrieta	No	
National City	No	
Newark	No	
Norwalk	No	
Oceanside	No	
Oxnard	Yes	PDF Scan/Upload
Palm Desert	No	
Palmdale	No	
Pinole	Yes	PDF Scan/Upload
Pismo Beach	No	
Placerville	No	
Port Hueneme	No	
Porterville	No	
Portola	No	
Poway	No	
Rancho Cordova	No	
Rancho Palos Verdes	No	
Rancho Santa Margarita	No	
Rocklin	Yes	PDF Scan/Upload
Rohnert Park	No	
Sacramento	Yes	Electronic Filing
Salinas	Yes	PDF Scan/Upload
San Juan Bautista	No	
San Juan Capistrano	No	
San Leandro	Yes	PDF Scan/Upload
San Luis Obispo	Yes	PDF Scan/Upload
San Ramon	No	
Sanger	No	
Santa Barbara	Yes	Electronic Filing
Santa Clara	Yes	Electronic Filing
Santa Cruz	No	
Santa Maria	Yes	PDF Scan/Upload
Seal Beach	No	
Shafter	No	
Signal Hill	No	
Solana Beach	No	
Stockton	Yes	PDF Scan/Upload
Sunnyvale	Yes	Electronic Filing
Susanville	No	
Thousand Oaks	Yes	PDF Scan/Upload

Tiburon	No	
Tracy	No	
Truckee	No	
Upland	Yes	PDF Scan/Upload
Vacaville	No	
Vallejo	No	
Vista	Yes	Electronic Filing
VSFCD	No	
Walnut Creek	No	
Weed	No	
Westlake Village	No	
Westminster	No	
Whittier	No	
Woodside	No	
Yuba City	No	