



June 22, 2021

VIA Email

Fair Political Practices Commission
1102 Q Street, Suite 3000
Sacramento, CA 95811

RE: Campaign Finance Reporting

Dear Commissioners:

The League of Women Voters of California is concerned both about transparency in campaign finance reporting, and about the accuracy of that reporting. We recently reviewed the campaign financing report for Proposition 13 (AB 48) on the CAL-ACCESS website. We concluded that the total contributions and expenditures reported are overstated because they include contributions made among committees that supported passage. Multiple committees funneled large sums of money to the largest committee involved in this effort (ID 1421558: Californians for Safe Schools...). The total contributions were shown as \$12.6 million. We estimate that the total donations excluding inter-committee transfers were closer to \$8.6 million.

Reviewing the expenditures by the various committees, it is evident that most of the expenditures directed toward influencing voters, e.g., advertising, campaign materials and events, were made by the largest committee. Most expenditures by the other committees were either for internal functions or inter-committee transfers.

This type of arrangement appears to be widespread among campaign committees. This not only distorts the picture of the amount of money involved in the campaigns, it also means that a list of top donors sponsoring an advertisement or political event will not identify the individuals and organizations who donated the funds – only the ‘feeder’ committees. The true donors can only be derived by analyzing the chain of contributions, but will not be apparent to voters unless disclosure requirements are carefully designed to pierce the veil.

We are aware of and support legislation engendered by the FPPC to improve

Fair Political Practices Commission

Page 2

June 22, 2021

the visibility of disclosure of funding sources. We are writing to request your analysis of whether pending legislation adequately addresses the issues we discuss in this letter and to ensure that CAL-ACCESS and its successor reflect true totals and real sources.

If you would like to discuss this in further detail, please contact Andrew Muse-Fisher at amusefisher@lwvc.org.

Sincerely,

A handwritten signature in black ink that reads "Carol Moon Goldberg". The signature is written in a cursive, flowing style.

Carol Moon Goldberg
President