



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
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**To:** Chair Miadich, Commissioners Baker, Wilson, and Wood

**From:** Chloe Hackert, Education & External Affairs Unit Manager, Legal Division  
Dave Bainbridge, General Counsel

**Subject:** Updated Campaign Form 410 – Statement of Organization (Recipient Committee)

**Date:** October 9, 2023

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Attached for your approval is updates to the Form 410

Revisions have been made to Form 410 and instructions to incorporate recent changes resulting from legislation [AB 2172](#) and Commission [Regulation 18410](#). AB 2172 allows a person required to file a report or statement by paper with the Secretary of State to instead file by email with a digital signature or other digital means as prescribed by the Secretary of State. The form instructions have been updated to include information on how to file Form 410 with a verified digital signature. Regulation 18410 requires a committee to disclose the names of those persons authorized, other than the treasurer, to obtain committee bank records on the committee's Statement of Organization (Form 410). The regulation goes into effect on January 1, 2024. For committees existing prior to January 1, 2024, the Statement of Organization shall be amended to include the names of those authorized to obtain the bank records by July 1, 2024, or the next time the committee files an amended Statement of Organization, whichever is earlier. Additionally, other minor non-substantive changes were made to the form instructions.

The draft form with instructions was made available on the Commission's website in August for public review and comment. One comment was received regarding [AB 909](#), which requires committees to include the full name, street address, email address, and telephone number of the treasurer and any other principal officers. The provision of AB 909 requiring email addresses for treasurers and principal officers is effective now. However, other requirements from AB 909 are operative upon the certification of the Secretary of State's new Cal-Access Replacement System (CARS). The form and form instructions have been modified to include this requirement. Additionally, we consulted with the Secretary of State's office and made other non-substantive changes to clarify filing instructions per its staff's request.

The Commission received a request from the California Political Attorneys Association (CPAA) to further delay the implementation of the amendments to Regulation 18410 until legislation is passed to require redaction of committee bank account information on the Form 410. The Commission, in approving amendments to Regulation 18410 in October of 2022, delayed the effective date of the regulatory changes to January 1, 2024 to allow time to seek a legislative change requiring redaction of bank account information on the Form 410 at the urging of CPAA. The Commission sponsored such a bill this year but the bill failed to pass the legislature. No changes were made to the Form 410 in response to this comment.

All changes made since the form was noticed are highlighted in green.

We recommend your approval of the following:

- Form 410 – Statement of Organization (Recipient Committee)