

Public Comment for PDC Meeting held on 12/2/21

Commissioners Jarrett, Downing, Isserlis, & Hayward:

I am writing to provide feedback on the most recent draft of the PDC's legislative agenda.

First, thank you for listening to the feedback of treasurers regarding the short amount of time that we have currently have to prepare the 21- and 7-day reports under current law. Granting an additional day to prepare these pre-election C4 reports and ensure their accuracy is a very welcome change. Thank you.

However, treasurers are still extremely concerned about the proposal to dramatically increase the number of C4s that are due the month before both the primary and general elections as evidenced by the public comments submitted last month.

In opposing the increase to four pre-election C4 reports, I want to note a few things.

First, the current proposal effectively establishes 27-, 20-, 13-, and 6- day pre-election reports. Here is what that would have looked like for the 2021 cycle:

27-day C4: Covering September 1st to October 4th (Monday), due on October 6th (Wed.)

20-day C4: Covering October 5th (Tuesday) to October 11th (Monday), due on October 13th (Wed.)

13-day C4: Covering October 12th (Tuesday) to October 18th (Monday), due on October 20th (Wed.)

6-day C4: Covering October 19th (Tuesday) to October 25th (Monday) due on October 27th (Wed.)

As noted by the League of Women Voters representative at the last regular Commission meeting, the drop date for ballots was 10/15/21. In other words, if the Commission dropped the 27-day C4 reports in their current schedule, those who received their ballots shortly after 10/15/21 would still have access to the most up-to-date information. What is the purpose in requiring us to file the 27-day report? To me, there would seem to be little purpose in having treasurers engage in expedited C4 reporting when voters do not have ballots in hand yet.

Next, please understand the burden associated with increasing the amount of C4 reports is not a small one. Preparing C4 reports, tracking down required information, reconciling the draft C4 against the bank statements, and getting the required approvals from candidates is one of the most challenging aspects of being a treasurer. Doubling the amount of C4s that are due before both the primary and general elections represents a significant increase in the amount of work treasurers must perform, which in turn will force us to increase the prices that we charge our candidates. This increase in treasurer responsibilities may also mean many volunteer treasurers will no longer be willing to serve because it is just too much work.

Third, treasurers have long been required to file contributions reports (C3s) on a weekly basis, which makes sense. Voters have a much greater interest in seeing extremely up-to-date information regarding who is contributing to campaigns, and a somewhat smaller interest in seeing how that money is spent (at least on such a rapid reporting schedule). Again, during most of the cycle we file C4 reports on a roughly monthly basis.

For the above reasons, I would ask the Commission to please consider reducing the number of C4 reports due the month before the election from four to three (keep the proposed 20-, 13-, and 6-day reports, nix the 27-day report which is due when people haven't received ballots yet).

Sincerely,

Conner Edwards
Campaign Treasurer