

Hello:

I am writing to comment on the agency's proposed legislation.

Increasing number of C4s due: AGAINST

- 1) I oppose the proposal to increase the number of C4s due the month before the primary and general election. We currently report contributions on a weekly basis, and I believe that is the information the public is most interested in. Unnecessarily adding additional C4 reports will take valuable time away from the treasurer's core responsibilities to the campaign (donations, deposits, expenditures, etc.) in the crucial weeks leading up to the election. Please consider rethinking this proposal.

Increasing level of digital advertising details: AGAINST

- 2) I oppose the proposal to make campaigns report additional details relating to digital advertising. Some of the information that could be required for reporting is currently not on most invoices. I could see this being a burden that could take hours per week to resolve, if at all, during a period which the treasurer is already stretched due to added reporting requirements and the needs of the campaign.

Giving us another day to file pre-election C4 reports: SUPPORT

- 3) I strongly support the idea – which was in the bill last year – of giving us 2 days as opposed to 1 day to file the 21- and 7-day report. Other states give treasurers a lot more time to put these reports together. Putting these reports together, getting the appropriate level of detail right, and getting candidate approval can take a lot of time and we could use another day to accomplish this.

Increasing LMC threshold to only apply to large contributions: SUPPORT

- 4) I support the idea of increasing the LMC threshold so that campaigns don't have to report regular campaign contributions on an expedited basis. Having campaigns report especially large contributions on an expedited basis (such as those that come from bona-fide political parties that aren't subject to contribution limits) is completely understandable. However, regular sized contributions are currently disclosed on a weekly basis for the public to review.

Reforming Foreign Contribution Certification Requirement: SUPPORT

- 5) PLEASE consider a change to the foreign contribution certification requirement. Complying with this requirement takes up a disproportionate amount of our time and distracts us from our core responsibilities.

I support the idea of making it so that contributors file their foreign certifications directly with the PDC and not with the campaigns.

Sincerely,

Jason Michaud, Campaign Treasurer