



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Richard Doyle, City Attorney
Lee Price, MMC, City Clerk

SUBJECT: PROPOSED REVISIONS TO
CHAPTER 12.06 OF THE
SAN JOSE MUNICIPAL CODE
RELATED TO THE CITY'S
CAMPAIGN FINANCE
REGULATIONS

DATE: October 8, 2009

RECOMMENDATION

As recommended by the Elections Commission and the City Clerk, approve an ordinance amending parts of Chapter 12.06 of the San José Municipal Code related to Campaign Finance Regulations.

BACKGROUND

On October 10, 2006, the City Council referred to the City Attorney and the Elections Commission consideration of various actions related to independent committees, including recommendations to review provisions of Title 12 of the Municipal Code. On January 24, 2007, the Rules and Open Government Committee referred to the Elections Commission a recommendation from the Mayor's Transition Committee to re-initiate the contribution limits for independent committees.

The Elections Commission deferred work on the two referrals until the Ninth Circuit Court of Appeals issued a ruling in the *COMPAC v. City of San José* case. After the Ninth Circuit directed the trial court to dismiss the case on October 14, 2008, the Elections Commission began considering amendments to the City's campaign finance regulations, among other provisions.

On July 8, 2009, the Elections Commission approved a draft ordinance which, among other things, proposed suspending the provisions that limit contributions to independent committees until the United States Court of Appeals for the Ninth Circuit issues a decision in *Long Beach Area Chamber of Commerce v. City of Long Beach* or December 31, 2010, whichever is later. The City Council did not approve this recommendation; instead, on August 11, 2009, a majority of the Council voted to maintain contribution limits to independent committees.

In light of the Council's vote on August 11th, staff worked to clarify the language in Chapter 12.06 that regulates contributions to independent committees. After outreach to stakeholders (including campaign committees who have participated in San Jose elections and have filed campaign statements with the City Clerk, campaign lawyers and campaign consultants as well as other interested parties), staff presented a draft ordinance to the Elections Commission at a Special Meeting on September 30, 2009. After discussion, the Elections Commission approved the concepts of the draft ordinance posted with this memo and directed staff to present the recommendations to the City Council.

The City Clerk recommends an additional revision to the ordinance to eliminate the requirement that candidates and candidate-controlled committees itemize all contributions received, including those less than \$100.

ANALYSIS

A. The Proposed Ordinance Increases Contribution Limits¹

The proposed ordinance doubles contribution limits to candidates, candidate-controlled committees and independent committees as follows:

- From \$100 to \$200 per election to any councilmember, council candidate and any controlled committee of that candidate unless the candidate participates in the Voluntary Expenditure Limit Program. (See Section 12.06.210(A).)
- From \$250 to \$500 per election to any councilmember, council candidate and any controlled committee of that candidate if the candidate participates in the Voluntary Expenditure Limit Program. (See Section 12.06.540(A).)
- From \$250 to \$500 per election to any mayor, mayoral candidate and any controlled committee of that candidate unless the candidate participates in the Voluntary Expenditure Limit Program. (See Section 12.06.210(B).)
- From \$500 to \$1,000 per election to any mayor, mayoral candidate and any controlled committee of that candidate if the candidate participates in the Voluntary Expenditure Limit Program. (See Section 12.06.540(B).)
- From \$250 to \$500 per election to independent committees making either a contribution to a clearly identified candidate for San Jose city council or mayor or an expenditure in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in

¹ The proposed ordinance also eliminates two redundant sections (Sections 12.06.270 and 12.06.280), which established the same contribution limitations to candidates for City Council and Mayor as Section 12.06.210.

context, unambiguously urges a particular result in an election for a candidate for San Jose city council or mayor. (See Section 12.06.310(A).)

The Elections Commission recommends doubling the contribution limits for two reasons. First, the limits have not been increased for nearly 20 years; if the limits had been increased based on a cost of living adjustment each year over the past 20 years, the limits would likely have doubled. Second, the limits of \$500 - \$1,000 are consistent with the comparable contribution limits set in other large cities in California. A chart of the contribution limits of other municipalities, which the Elections Commission reviewed, is Attachment 1 to this memo.

B. The Proposed Ordinance Clarifies the Contributions Regulated

The proposed ordinance clarifies what contributions will be regulated. The current version of Chapter 12.06 includes the language "in aid of and/or in opposition to" a candidacy or the nomination or election of a candidate for city council or mayor. Some stakeholders who receive contributions and make expenditures for elections in San Jose have argued that the "in aid of/and or in opposition to" language is not sufficiently clear. To clarify the contributions that are subject to the City's regulations, the "in aid of/and or in opposition to" language has been replaced.

In Section 12.06.230, the proposed ordinance makes clear that only anonymous contributions "for a clearly identified candidate for San Jose city council or mayor" are prohibited. This phrase – "for a clearly identified candidate" – is used in the Political Reform Act and federal campaign reform legislation as well as in the recent addition to Chapter 12.06 on "electioneering communications".

In Sections 12.06.310 and 12.06.320, the proposed ordinance makes clear that the only contributions to independent committees that are regulated are those "which are to be used for (1) contributions to a clearly identified candidate for San Jose city council or mayor; or (2) expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate for San Jose city council or mayor."

The phrase "expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election" is taken from the definition of "independent expenditure" in the Political Reform Act and the San Jose Municipal Code.

While the new language of "for a clearly identified candidate" and "expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election" is narrower than "in aid of/and or in opposition to", it should

be more clear to those who make and receive contributions in San Jose elections for City Council and Mayor.

C. The Proposed Ordinance Eliminates Itemization of Contributions

The current ordinance requires that candidates and candidate-controlled committees itemize all contributions received, including those less than \$100. This requirement exceeds the obligations under the Political Reform Act, which mandates itemization of contributions \$100 and over. The proposed ordinance eliminates itemization of contributions under \$100. (See Section 12.06.910.) The City Clerk recommends this revision because the value of itemizing contributions does not outweigh the burden on candidates and their committees to prepare and file the itemization. Since the purpose of San Jose's limits on contributions is to ensure that donors do not make large contributions to influence the election of the offices of Mayor and City Council, requiring itemization of contributions \$100 and over is consistent with that goal.

PUBLIC OUTREACH/INTEREST

The Elections Commission conducted a Special Meeting on September 30, 2009, to review a version of the proposed ordinance posted with this memo. The stakeholders listed in Attachment 2 (including campaign committees who have participated in San José elections and have filed campaign statements with the City Clerk, campaign lawyers and campaign consultants) were invited to participate in the meeting and submit written comments.

In addition, if the ordinance is adopted, the City Attorney and City Clerk will provide additional outreach and education to the public (including candidates and the stakeholders' group) to ensure that the new regulations are adequately disseminated.

CONCLUSION

The proposed ordinance includes important revisions to the campaign finance regulations.

The proposed ordinance doubles the contribution limits to candidates, candidate-controlled committees and independent committees that make either a contribution to a clearly identified candidate for San Jose city council or mayor or an expenditure in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate for San Jose city council or mayor. The recommended increases are based on a projection of the cost of living increases applied each year over the past 20 years, as well as a comparison of the contribution limits of other large cities in California.

The proposed ordinance also clarifies the language "in aid of and/or in opposition to" that is included in the current ordinance. In Section 12.06.230, the proposed ordinance makes clear that only anonymous contributions "for a clearly identified candidate for San Jose city

HONORABLE MAYOR AND CITY COUNCIL

October 8, 2009

Subject: Proposed Revisions to SJMC re: Campaign Finance Regulations

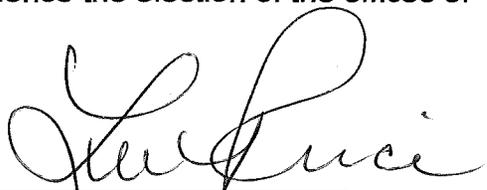
Page 5 of 5

council or mayor" are prohibited. In Sections 12.06.310 and 12.06.320, the proposed ordinance makes clear that the only contributions to independent committees that are regulated are those "which are to be used for (1) contributions to a clearly identified candidate for San Jose city council or mayor; or (2) expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate for San Jose city council or mayor."

Finally, the proposed ordinance eliminates itemization of contributions under \$100. Requiring itemization of contributions \$100 and over is consistent with the goal of preventing donors from making large contributions to influence the election of the offices of Mayor and City Council.



RICHARD DOYLE
City Attorney



LEE PRICE, MMC
City Clerk

For questions please contact Lee Price, City Clerk, at (408) 535-1260

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY OF SAN JOSE AMENDING SECTIONS 12.06.210, 12.06.310 AND 12.06.540 OF THE SAN JOSE MUNICIPAL CODE TO INCREASE CONTRIBUTION LIMITS; AMENDING SECTIONS 12.06.230, 12.06.310 AND 12.06.320 TO CLARIFY THE CONTRIBUTIONS REGULATED; REPEALING SECTIONS 12.06.270 AND 12.06.280 TO ELIMINATE REDUNDENCY; AND AMENDING SECTION 12.06.910 TO ELIMINATE THE REQUIREMENT THAT CANDIDATES AND CANDIDATE-CONTROLLED COMMITTEES ITEMIZE CONTRIBUTIONS LESS THAN \$100

WHEREAS, since the 1980s, the City of San José has imposed limitations on campaign contributions to candidates, candidate-controlled committees and independent committees; and

WHEREAS, the intent of the City Council is and has been to place realistic and enforceable limits on the amount individuals and independent committees may contribute to political campaigns in municipal office elections for the purpose of preventing the perception by the public that campaign contributors exercise undue or improper influence over elected officials; and

WHEREAS, the intent of the City Council is and has been to prevent the circumvention of contribution limits to candidates for City Council and Mayor and their controlled committees by large individual contributions to independent committees engaged in activity to influence City Council and Mayoral elections; and

WHEREAS, the National Institute on Money in State Politics concluded in a report dated August 1, 2007 that "independent expenditures are the largest loophole contributors use to circumvent limits on direct campaign contributions"; and

WHEREAS, the California Fair Political Practices Commission concluded in a report dated June 2008 that "independent expenditures have thwarted the will of the people and dramatically undermined California's campaign finance laws and that there is no question that the influence of independent expenditures is at the highest point ever in California's history"; and

WHEREAS, the City's longstanding contribution limits have been effective in preventing corruption and the appearance of corruption and in maintaining the integrity of the electoral process; and

WHEREAS, the current contribution limits, which have not been increased for nearly 20 years, should be increased now; and

WHEREAS, the City will continue to limit contributions to independent committees in furtherance of its and its residents' significant interests in preventing circumvention of the contribution limits applicable to candidates and their controlled committees and maintaining the integrity of the electoral process; and

WHEREAS, it is in the public interest to ensure that donors do not make large contributions and independent committees do not receive or solicit unlimited campaign contributions to be used to influence the election of the offices of Mayor and City Council; and

WHEREAS, it is the intent of the City Council to limit only contributions to independent committees and not expenditures by independent committees;

NOW, THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SAN JOSE:

SECTION 1. Section 12.06.210 of Part 2 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.210 Campaign Contribution Limitations

A. The total campaign contribution made by any person to any councilmember, council candidate and any controlled committee of that candidate, other than the candidate in aid of himself or herself, may not exceed:

1. ~~One~~Two hundred dollars (\$200) for the primary election;
2. ~~One~~Two hundred dollars (\$200) for the general election, if any;
3. ~~One~~Two hundred dollars (\$200) for any special election.

B. The total campaign contribution made by any person to any mayor, mayoral candidate and any controlled committee of that candidate, other than the candidate in aid of himself or herself, may not exceed:

1. ~~Two hundred fifty~~Five hundred dollars (\$500) for the primary election;
2. ~~Two hundred fifty~~Five hundred dollars (\$500) for the general election, if any;
3. ~~Two hundred fifty~~Five hundred dollars (\$500) for any special election.

C. If the candidate voluntarily elects to participate in the voluntary campaign expenditure limitation program, the alternative campaign contribution limitations set forth in Part 5 ~~shall~~will apply in lieu of subsections A and B.

SECTION 2. Section 12.06.230 of Part 2 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.230 Anonymous Contributions

- A. No person ~~shall~~may make nor ~~shall~~may any person solicit or accept any anonymous contribution, gift, subscription, loan, advance, deposit, pledge or promise of money or anything of value ~~in aid of or opposition to a candidacy for a clearly identified candidate for San José City Council or Mayor.~~
- B. All anonymous contributions ~~shall~~must be surrendered to the Director of Finance for deposit in the general fund of the City, earmarked to defray the costs of municipal elections.

SECTION 3. Section 12.06.270 of Part 2 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby repealed:

~~12.06.270 Contribution limitations to city council candidates~~

~~No person, other than the candidate in aid of himself or herself, shall make nor shall any person solicit or accept any contribution in aid of and/or opposition to the nomination or election of a candidate for city council which will cause the total amount contributed by such person to the candidate and any controlled committee of such candidate to exceed one hundred dollars per election, except as provided in Part 5 of this chapter.~~

SECTION 4. Section 12.06.280 of Part 2 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby repealed:

~~12.06.280 Contribution limitations to mayoral candidates~~

~~No person, other than the candidate in aid of himself or herself, shall make nor shall any person solicit or accept any contribution in aid of and/or opposition to~~

~~the nomination or election of a candidate for mayor which will cause the total amount contributed by such person to the candidate or any controlled committee of such candidate to exceed two hundred fifty dollars per election, except as provided in Part 5 of this chapter.~~

SECTION 5. Section 12.06.310 of Part 3 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.310 Contribution Limitations to Independent Committees

- A. No person ~~shall~~may make nor ~~shall~~may any person accept any contribution to or on behalf of an independent committee ~~expending funds or making~~ (1) a contribution to a clearly identified candidate for San Jose city council or mayor; or (2) an expenditure in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election ~~contributions in aid of and/or opposition to the nomination or election of~~ for a candidate for San Jose City Council or Mayor which will cause the total amount contributed by such the person to such the independent committee to exceed two hundred fifty five hundred dollars (\$500) per election.
- B. ~~If an independent independent committees committee will be contributing to or making expenditures in election campaigns in addition to City of San José council or mayoral campaigns, it shall segregate, from all other contributions, the contributions received and contributions which are to be used for~~ (1) contributions to a clearly identified candidate for San José City Council or Mayor; or (2) expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a

~~whole and in context, unambiguously urges a particular result in an election for a candidate for the purpose of influencing such San José City Council or Mayor~~elections from all other contributions or expenditures. Where such an independent committee has segregated such contributions which are to be used for (1) contributions to a clearly identified candidate for San José City Council or Mayor; or (2) ~~and expenditures~~ made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate for such San José City Council or Mayor~~city~~ elections, contributors to that committee may contribute more than ~~two hundred fifty-five~~ hundred dollars (\$500) so long as no portion of the contribution in excess of ~~two hundred fifty-five~~ hundred dollars (\$500) is used for (1) contributions to a clearly identified candidate for San José City Council or Mayor; or (2) expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate to influence for San José City Council or Mayor~~city~~ elections.

- C. ~~To the extent an independent committee segregates, from all other contributions, the contributions received which are to be used for (1) contributions to a clearly identified candidate for San José City Council or Mayor; or (2) expenditures made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate, or, taken as a whole and in context, unambiguously urges a particular result in an election for a candidate for San José City Council or Mayor, as required by subsection B, This~~ this Section is not intended to prohibit or regulate contributions to independent committees ~~to the extent such contributions are used on behalf of or in opposition to candidates for elections for offices other than a San José mayoral or council offices~~ election~~of the city of San Jose.~~

SECTION 6. Section 12.06.320 of Part 3 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.320 Contributions and Expenditures by Independent Committees

- A. Independent committees are "persons" for purposes of the contribution limitations to city council and mayoral candidates. Any expenditure by an independent committee for a clearly identified candidate for San José City Council or Mayor ~~in aid of or in opposition to a council or mayoral candidate~~ which is not an "independent expenditure" is deemed to be a contribution to that candidate, subject to the limitations of this Chapter.
- B. Each independent committee making contributions or independent expenditures in a council or mayoral election which does not participate in elections other than for City offices shall file the reporting statements required by Section 12.06.910. For each expenditure or contribution, the committee shall report what amount or portion was of benefit to a particular candidate.

SECTION 7. Section 12.06.540 of Part 5 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.540 Campaign Contribution Limits

Candidates who participate in the voluntary campaign expenditure limits program ~~shall be~~ are entitled to collect contributions in the following amounts:

- A. The total contributions per election made by any person to any council candidate participating in the voluntary campaign expenditure limits program or to the

controlled committee of that candidate ~~shall~~must not exceed a total of more than ~~two hundred fifty~~five hundred dollars (\$500) in the aggregate.

- B. The total contributions per election made by any person to any mayoral candidate participating in the voluntary campaign expenditure limits program or to the controlled committee of that candidate ~~shall~~must not exceed a total of more than ~~five hundred~~one thousand dollars (\$1,000) in the aggregate.

SECTION 8. Section 12.06.910 of Chapter 12.06 of Title 12 of the San José Municipal Code is hereby amended to read as follows:

12.06.910 Statements and Reporting Requirements

- A. Each candidate, candidate controlled committee and independent committee receiving contributions or making expenditures in a City election must file with the City Clerk campaign disclosure statements in the form and at the times required by Chapter 12.06 and the Political Reform Act. The campaign disclosure statements must show the total amount of contributions accepted and expenditures made, including independent expenditures. The campaign disclosure statements may be completed on forms required to be filed by the regulations of the Fair Political Practices Commission so long as such forms are completed in sufficient detail to comply with the requirements of this Chapter. The campaign disclosure statements must contain a declaration by the candidate or controlled committee treasurer that the candidate or committee has not accepted nor solicited any campaign contribution in violation of the requirements and limitations of this Chapter.

- ~~B. When listing contributions, each candidate and candidate controlled committee receiving contributions or making expenditures in a City election must itemize all~~

~~contributions accepted during the campaign contribution collection periods specified in this Chapter including all amounts less than one hundred dollars (\$100).~~

- CB. The first and second campaign statements must be filed at the times prescribed for pre-election statements by the Political Reform Act as well as any other times prescribed in Chapter 12.06, for candidates, candidate controlled committees and independent committees for whom the City Clerk is the regular filing official. If the City Clerk is not the regular filing official for an independent committee receiving contributions and making expenditures in a City election, the independent committee must file campaign statements with the City Clerk in accordance with this Chapter.
- DC. Once an independent committee whose primary filing official is not the City Clerk has filed a campaign disclosure statement with the City Clerk, the committee must also file with the City Clerk, within two (2) business days, copies of campaign disclosure statements filed by the committee with its regular filing official for the previous twelve (12) months.
- ED. Once an independent committee whose primary filing official is not the City Clerk has filed a campaign disclosure statement with the City Clerk, from that date forward, that committee's campaign disclosure statements must be filed with the City Clerk in the form and at the times required by Chapter 12.06, the California Political Reform Act and the California Fair Political Practices Commission until the committee terminates or has not received contributions or made expenditures, including independent expenditures, in an election in the City of San José for four (4) years.

RD:LH
10/08/2009

FE. If any person files a campaign disclosure statement after any deadline imposed by this Chapter, the City Clerk must fine the person ten dollars (\$10.00) per day, starting the day after the filing deadline, until the statement is filed; however, no liability may exceed the cumulative amount of reported contributions or expenditures, or one hundred dollars (\$100), whichever is greater. The City Clerk may reduce or waive the fine if he or she determines that the late filing was not willful and that enforcement will not further the purposes of this Chapter.

PASSED FOR PUBLICATION of title this _____ day of _____, 2009, by the following vote:

AYES:

NOES:

ABSENT:

DISQUALIFIED:

CHUCK REED
Mayor

ATTEST:

LEE PRICE, MMC
City Clerk

ATTACHMENT #1
Other Municipalities' Contribution Limits

CITY	INDIVIDUAL	BUS/PACS/CM TE	COUNCIL	MAYOR	OTHER?	ANONYMOUS?	ITEMIZATION THRESHOLD?	MISC
Aurora Hills	\$250					\$5 & under		
Albany	\$100/\$250 (VEL)					\$200		
Anaheim	\$1,700							
Bell Gardens	\$100/State Limits (VEL)							
Benicia	\$250							
Berkeley								
Brenwood								
Burbank	\$250							
California City								
Capitola	\$200 (calendar year)							
Chico	\$500					prohibited		
Chula Vista	\$300							
Claremont	\$250 (calendar year)							
Commerce	\$500	\$500						
Concord	\$1,000	\$1,500						
Coronado	200 (calendar year)	prohibited						
Cotati	\$350						\$50	
Davis	\$100					\$10	\$250	
Del Mar	\$100	\$250						
Dublin	\$300							
El Segundo	\$500					prohibited	list ZIP code of cont <\$100	
Encinitas	\$250							
Escondido	\$530					prohibited		
Fairfield								
Folsom	\$150							
Fountain Valley	\$500							
Fremont	\$500							
Fresno	3600 (CPI 2 years)	\$7200 (CPI 2 years)						
Galt	\$100					\$10		

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CITY	INDIVIDUAL	BUS/PACs/CM TE	COUNCIL	MAYOR	OTHER?	ANONYMOUS?	ITEMIZATION THRESHOLD?	MISC
Glendale	1000 (CPI 2 years)							
Hayward	\$250/\$1,000 (VEL)							
Healdsburg	\$500							
Hermosa Beach	\$250							
Highland								
Huntington Beach	\$520 (CPI)							
Irvine	\$300 (CPI)							
La Mesa								
Laguna Beach	\$360 (CPI)	\$360 (CPI)						
Laguna Niguel	\$1,000					\$50	\$50	
Lancaster								
Lemon Grove	\$250					\$250 (cap on use)		
Livermore	\$250				\$500	\$50		
Long Beach			\$350	\$700	(Attorney/DA/ Auditor)			
Los Angeles			\$500	\$1,000	\$500 to committees (other than candidate controlled committees)	\$200 (aggregate)		
Merced	\$515 (CPI)	\$2,062						
Milpitas	\$350							
Modesto		\$3,000 ("major contributor")						
Montclair								
Mountain View								
Murrietta	\$500/\$1,000 (VEL)							
Newark	\$100/\$500 (VEL)							

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CITY	INDIVIDUAL	BUS/PACs/CM TE	COUNCIL	MAYOR	OTHER?	ANONYMOUS?	ITEMIZATION THRESHOLD?	MISC
Newport Beach	\$1,000					\$200 (cumulative per election)		
Novato								
Oakland	\$100/\$600 (VEL)	\$300/\$1,300 (VEL)						
Oceanside	\$1,000 (pending ord adoption)							
Ontario								
Orange			\$1,000	\$1,000	\$1,000 (Clerk/ Treasurer)			\$500 recalls, \$1000 specials
Pacific Grove	\$500 (CPI)	prohibited						
Patterson						\$25	\$25	
Petaluma	\$200							
Pico Rivera								
Pleasant Hill	\$500	\$1,000				prohibited	\$25	
Pomona			\$500	\$1,000		prohibited	\$25	
Poway	\$100	prohibited						
Rancho Palos Verdes								
Rohnert Park	\$500							Ordinance reviewed every 4 years
Rolling Hills	\$250							
Roseville	\$250/\$500 (VEL)							
Sacramento			\$1,500	\$3,000				
			\$5,000 LPC (Lg Political Cmte)	\$10,000 LPC				
San Fernando	\$500 (CPI)							
San Juan Capistrano	\$250					\$500 aggregate		
San Luis Obispo	\$200					\$50	\$50	
San Mateo	\$250	\$500						
San Francisco	\$500	prohibited						

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Other Municipalities' Contribution Limits

CITY	INDIVIDUAL	BUS/PACs/CM TE	COUNCIL	MAYOR	OTHER?	ANONYMOUS?	ITEMIZATION THRESHOLD?	MISC
San Diego	\$500 per election (CPI)	prohibited				\$200 aggregate	\$100	
San Jose			\$100/\$250 (VEL)	\$250/\$500 (VEL)		prohibited	any amount must be disclosed	
Santa Ana	\$1,000							
Santa Barbara								
Santa Clarita	\$360							
Santa Cruz	\$250 (CPI)	\$600 (CPI)						
Santa Monica	\$250							
Santee	\$600 (CPI, individual or sole prop)	prohibited						
Scotts Valley	\$100/State Regs (VEL)	prohibited						
Signal Hill	\$440 (12% increase in 2010)							
Simi Valley	\$1,000							
Sonoma	\$100/\$200 (VEL)							
Southgate	\$1,000							
Thousand Oaks	\$350 (CPI)					\$25		
Torrance	\$100							
Ukiah	\$200/\$500 (VEL)							
Union City	\$600							
Ventura	\$175/\$275 (VEL)							
Vista	\$340							
Walnut Creek	\$145 (CPI)							
West Sacramento	\$250							

Attachment # 2

List of Stakeholders Notified of Elections Commission's Proposals

AEC Professionals, Inc
Association of Retired San Jose Police Officers and Firefighters PAC
American International Group
BFGC Architects Planners, Inc.
California Clean Money Campaign
Californians for Electoral Reform
Citizens for a Stronger Safer San Jose
Coalition for Responsible Airport
Committee to Protect Fire and Police Services, Yes on Measure B
Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP
Tom Mertens, former Elections Commissioner
Nielsen, Merksamer, Parrinello, Mueller & Naylor, LLP
Nelson/Allison Planned Parenthood Advocates
New America Foundation
Ash Pirayou, Esq.
Bianca Pirayou, Esq.
Terry Reilly, former Elections Commissioner
Retired San Jose Police Officers Association
San Jose Firefighters, IAFF Local 230
San Jose POA Political Issues Committee
San Jose/Silicon Valley Chamber of Commerce
San Jose/Silicon Valley Chamber of Commerce PAC (COMPAC)
Santa Clara County Democratic Central Committee
Santa Clara County Republican Party
South Bay Labor Council
Alex Stuart, Esq.
James Sutton, Esq.
Working Partnerships USA

