

Andrea Gyger

From: Brian Lewis <[REDACTED]>
Sent: Monday, December 12, 2011 8:55 PM
To: Andrea Gyger
Subject: Comments to Revised Draft Proposed CPF Rules

Dear Ms. Gyger and Secretary Gessler:

I am writing in response to the revised draft proposed CPF rules that will be reviewed during a hearing on December 15, 2011. I appreciate your effort to make the rules more clear and understandable. In many cases I believe this has been accomplished. There are a few I would like to seek additional clarification to in this rulemaking process:

- 1) Cost of Admissions to Fundraising Events – current guidance indicates that the amount received above the value of the meal is reportable as a contribution. However, there is no mention regarding the amount received for the meal. Is this supposed to be reported as “other income” or a “returned expenditure”? I have sought guidance directly from the support helpline on this topic but have been told that this amount is not to be reported. However, forgoing the reporting of the amount of the meal will incorrectly understate the cash balance. It would be helpful to know how this amount is to be reported for campaign compliance purposes.
- 2) TRACER Occupation Codes – With the advent of TRACER, there has been a requirement to interpret and convert information provided by contributors to occupation codes detailed in TRACER or submit as “other” and augment with the occupation in the “explanation” field. This could lead to frivolous complaints or perceived violations if the interpretation of a contributor’s occupation is not done to another’s satisfaction. The conversion of this information to a predefined coding schema is not required by Statute. I would request that the required information be simplified to a simple text field without a predefined coding schema.
- 3) TRACER Expense Codes – Similar to the Occupation Codes, TRACER currently requires either classifying an expense under a predefined coding schema or reporting the expenditure as “other” and augmenting this “other” expenditure type in the “explanation” field. This requires unnecessary effort by the reporting entities to cross reference it’s natural chart of accounts to an incomplete and inconsistent predefined coding schema that is provided for in TRACER. This is not required by Statute and can lead to frivolous complaints. I would request that the required information be simplified to a simple text field without a predefined coding schema.

Once again, I appreciate the work you and your team have put into this effort. I hope this will result in a more clear and understandable process that allows all to participate without the fear of either perceived or real violations of the rules unintentionally.

Brian

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