Andrea Gyger

From: Michele Austin

Sent: Saturday, March 28, 2015 7:58 PM

To: SoS Rulemaking

Subject: Comments - working draft CPF rules

Dear SOS,

1. Proposed rule 1.10 expands the definition of an LLC to include all types of limited partnerships, general partnerships and the like. There is already a provision in campaign law that requires LLC's to disclose any contribution and attribute the contribution to all of their members. Many (i.e. thousands) of limited partnerships are sold through registered stock brokers and have thousands of limited partners. Reclassifying limited and general partnerships as LLC's would have the effect of making partnership contributions illegal since reporting and tracking down the limited partners would be almost impossible. It would silence limited partnerships in elections.

I would oppose such a change and suggest that the SOS research how limited partnerships work.

Michele Austin