Andrea Gyger

From: Sarah Mudge

Sent: Monday, June 06, 2016 12:47 AM

To: SoS Rulemaking

Subject: Comments - working draft CPF rules

I am currently a candidate for County Commissioner in CO. I am reviewing the rules and regulations for campaign financing and would like to share some questions that I do not feel were answered having read through the 44 pages. Whether this is because I could not decipher the language regarding my inquiry or if the answer is in fact missing from the content of this document, can be for you to decide and understand better than I at this point.

Questions I still have:

- 1. Inkind donations: I am receiving in kind graphic design help from a friend and supporter. How do I report this? Do I value this at an hourly rate that she might otherwise charge for the same service? This would be my guess, but I am not sure that it is clear which is important to record, the value of the in kind service, or who is providing the service and for whom they are employed.
- 2. It is not clear how a candidate is expected to handle anonymous donations that are legitimately received. How do you return anonymous donations? How is this enforced?
- 3. How do you report expenditures throughout campaign and then reimburse yourself/candidate at the end of the race with all funds leftover? Especially if raised and contributed funds will not reach/match expenditures and reimbursements do not look whole to the invoice/charge at the time period of incurred expense? Can you reimburse a smaller amount within the 30 days of reporting and then reimburse for same expense later in campaign, in another reporting period? Can you make a note to reimburse candidate/yourself at the end of the campaign or after the result of the election in the amount of and not to exceed (whatever the total cost of personal expenses were during campaign?)
- 4. I am not sure if it is clear, or important to reimburse a CANDIDATE within 30 days of using personal funds to pay an expense. I am not clear as to whether or not I can total all expenses that came out of my/the candidates pocket and simply reimburse myself/the candidate at the end of the campaign or election with the remaining funds in the campaign account.
- 5. Independent Expenditure Committee is NOT defined in Rule 1: Definitions

It should be considered to simplify this document into a comprehensive chart of sorts for quick reference in smaller campaign finance reports in smaller communities where big money usually is not an issue or an influence. This may create an equitable approach and be a more inviting process for those who may not typically run for local elected seats, but should be running to represent their fellow community members.

I also suggest that in an online document, there are direct links to the articles referred to throughout the rules in order to quickly reference. I appreciate the training opportunities, but have not been able to take advantage due to distance and weather related complications to traveling to Denver from the higher mountain towns.

Thank you