



August 2, 2016

The Honorable Wayne Williams, Secretary of State  
Department of State  
1700 Broadway  
Denver, CO 80290

**Re: Revised Draft Proposed Campaign and Political Finance Rules, 8 CCR 1505-6**

Common Cause is a nonpartisan grassroots organization dedicated to upholding the core values of American democracy. We work to create open, honest, and accountable government that serves the public interest; promote equal rights, opportunity, and representation for all; and empower all people to make their voices heard as equals in the political process.

During the 2016 legislative session, Colorado Common Cause worked with the legislative sponsors and other stakeholders to support the passage of HB16-1282 to strengthen reporting requirements for both candidates and non-candidate committees in school board elections. Rules 1.7 and 17.2.1 should be amended to reflect the changes in reporting schedules for school board candidates required by the passage of HB16-1282.

Colorado Common Cause endorses the supplementary comments by Colorado Ethics Watch dated July 28, 2016. The legislative record for HB16-1282 clearly demonstrates that the intent of the bill was to increase the frequency of filings by candidates as well as non-candidate committees. If the Secretary of State believes that there could be ambiguity regarding how to apply the provisions of C.R.S. 1-45-108 and 1-45-109, rules 1.7 and 17.2.1 should be amended to make clear that school board candidates must file on the more frequent basis required by C.R.S. 1-45-108.

Thank you for the opportunity to comment.

Sincerely,

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