

**CITY OF SAN DIEGO  
ETHICS COMMISSION**

**M E M O R A N D U M**

**DATE:** May 8, 2015

**TO:** Chair and Members of the San Diego Ethics Commission

**FROM:** Stacey Fulhorst, Executive Director

**SUBJECT:** Housekeeping Amendments to Campaign Laws  
Docketed for Discussion at Ethics Commission Meeting on May 14, 2015

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As you will recall, the Commission recently completed its consideration of proposed amendments related to Professional Expense Funds. It is therefore timely for the Commission to consider additional housekeeping issues so that the package of proposed amendments can be presented to the City Council for approval. These housekeeping issues include the following:

- non-substantive revisions to the definitions of “independent expenditure” and “member communication” to ensure consistency with state law;
- modifications to the rules governing surplus funds to mirror recent changes in state law;
- additional recordkeeping requirements applicable to campaign advertisements (existing state and local recordkeeping laws do not address these records);
- modifications to the notification language that must be printed on candidate contribution solicitations concerning the prohibition against reimbursing contributions (money laundering) to clarify that the prohibition applies to individuals as well as business entities, and that the prohibition does not apply to situations involving a disclosed intermediary; and
- language clarifying that the law governing monetary contributions from sole proprietorships applies to non-monetary contributions as well.

A strike-out of the relevant sections of ECCO reflecting these proposed amendments is attached for your review.

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Stacey Fulhorst  
Executive Director

Attachment