

Dear GADs,

We thank you for your commitment to and assistance with our petition gathering efforts to qualify the Portability Initiative for the November 2018 Ballot.

As you know, there are complex political campaign finance laws we must comply with throughout our journey to make this happen. These rules require that time and expenses be tracked and reported differently depending on who the intended audience is for a communication, and whether the GAD or association staff engaged in the communication or other activity is an employee or an independent contractor.

To ensure that we all comply with these laws, we've put together the following Do's and Don'ts guidelines for GAD activities. If you have any questions or concerns about these, please do not hesitate to contact Rick Laezman at richardl@car.org or (213) 739-8273.

At this time, we are focused on activities and communications during the signature gathering phase. When we proceed into the campaign season, this list will evolve and we will send you additional information and guidelines. This list is not exhaustive and we may revise it depending on the issues that come about. Thank you for all your effort.

DOs AND DON'Ts FOR GADs AND LOCAL AORs

<u>DOs</u>	<u>DON'Ts</u>
<ul style="list-style-type: none"> • PRE-CLEAR with Rick Laezman all activities and communications relating to the Portability Initiative, whether directed to REALTORS® or to the public 	<ul style="list-style-type: none"> • DON'T send out communications on the spur of the moment – INSTEAD get pre-clearance
<ul style="list-style-type: none"> • PRE-CLEAR with Rick Laezman <u>all</u> expenses related to signature gathering, whether directed to REALTORS® or to the public <ul style="list-style-type: none"> ○ Local association general funds or ALF money must be used for <u>member</u> communications – but pre-clear with Rick Laezman for compliance purposes ○ All expenses for activities or communications intended to directly or indirectly influence or involve the public (non-REALTORS®) are reportable, and will be reimbursed by IMPAC or the ballot measure committee, as appropriate ○ The association should pay expenses for <u>public</u>-facing activities and promptly send the receipt to Rick Laezman for reimbursement by the ballot measure committee; for example, postage paid by the association to return signed petitions 	<ul style="list-style-type: none"> • DON'T incur any expenses without pre-clearance – INSTEAD get pre-clearance
<ul style="list-style-type: none"> • Track all time for public-facing communications and activities <ul style="list-style-type: none"> ○ “Public facing” means any activities or communications intended to reach the public (non-REALTORS®), either directly (Facebook posts, newspaper editorials, posts on public facing sections of the Association’s website), or indirectly (e.g., asking members to communicate with their clients or farms) ○ Get a time-log from Rick Laezman, and update it whenever you spend time on ballot measure communications or other activities directed towards the public (or asking members to communicate or interact with the public) ○ Provide date, time spent, detail of action and purpose, and the date it was pre-cleared • Report all tracked time to Rick Laezman <ul style="list-style-type: none"> ○ Employee GADs should report their time each pay period, and should include whether the time spent on public-facing activities exceeded 10% of their total time worked ○ Contract GADs should report time each invoice or month, whichever is more frequent ○ Contract GADs should separately invoice time & expenses for public-facing activities 	<ul style="list-style-type: none"> • DON'T prepare new public-facing communications – INSTEAD work with the ballot measure committee to reinforce a consistent message • DON'T ask REALTORS® to approach their farms, clients or other members of the public without pre-clearing it – INSTEAD get pre-clearance for your great ideas
<ul style="list-style-type: none"> • Remember that “public-facing” includes communications with REALTORS® if you are asking the REALTOR® to communicate with the public! 	<ul style="list-style-type: none"> • DON'T ignore the rules – INSTEAD review this list and contact Rick Laezman with any questions
<ul style="list-style-type: none"> • Allow your exempt employees to volunteer to gather signatures on their own time 	<ul style="list-style-type: none"> • DON'T allow non-exempt employees to volunteer to gather signatures • DON'T take adverse action against employees who don't want to volunteer