

April 11, 2016

The Honorable Ed Chau
Chair, Assembly Privacy and Consumer Protection Committee
State Capitol
Sacramento, CA 95814

RE: Opposition to AB 2855 (Frazier) – as amended on April 7, 2016

Dear Assemblyman Chau,

As charity leaders, we write to express our ongoing opposition to AB 2855 by Assemblymember Jim Frazier, which would require every charity seeking funds to support their work to include on their web sites and *any document* a charity produces which includes fundraising language to include a link to the Attorney General's web site.

While the web site disclosure requirement in subsection (a) is burdensome, expensive, duplicative, confusing and likely both unconstitutional and unenforceable, the "any document" requirement in subsection (b) is all those things on steroids.

The AG's office is already communicating this information to the public – their web site is the first listing in a Google search for "California charities." Burdening nonprofits in and beyond California with required speech on "any document" which seeks donor support to simply advertise what the public can easily find is unnecessarily punitive without serving any compelling public interest. Imagine all the "documents" that non-profit organizations create to solicit funds to support their mission-based work: signs on coin collection jars, private letters to individual donors, billboards and other large-scale outdoor advertisements, flyers posted in laundromats, neighborhood association newsletters, to name just a few. And AB 2855's provisions would apply to any charity – regardless of where they are based – that solicits donations from Californians. So, every inbound piece of mail from any charity in the world would have to include this unnecessary disclosure. The additional cost of including this provision on "any document" would be extraordinary.

Here are some of the concerns voiced by California nonprofit organizations to California Association of Nonprofits (CalNonprofits) to AB 2855, as amended on April 7, 2016:

- *For a small organization like the ours, including this information on all postcards, brochures, postcards, emails would be excessively difficult. We are run exclusively by volunteers, our budget is small, the possibility of errors is probable, not just possible.*
- *We take our role as stewards of our donors' and taxpayers' money very seriously and strive for utmost transparency in our communication of our community impact and use of financial resources. This bill puts a significant burden on all nonprofit organizations, but particularly small organizations that already struggle with the legal requirements for financial and outcome reporting with the state and our funders.*
- *While they are nonprofits that are not ethical, the VAST majority are doing excellent work on a shoestring (or less) budget. There are already a number of ways potential donors can find financial information. This bill will only serve to keep the good nonprofits from being properly funded to serve those in need.*
- *This bill would be a disaster for nonprofits and creates a poisonous image. Donors need to be encouraged not warned. The vast majority of nonprofits get by on so little. That their heroic efforts on behalf of the public good would be undermined because of the rare incidents*

of unscrupulous behavior of the few would be tragic. Punish those who abuse the public trust, not those who work for it.

- *I am supportive of creating greater transparency for donors but do not see this bill as achieving that goal.*
- *The burdens placed on small, nonprofits by the requirements of this bill, would create an extreme burden and hardship on our volunteer staff. Compliance with this bill takes away from our time and resources to the detriment of the student musicians we serve.*

California's nonprofit organizations are trusted and relied upon by millions of citizens who rely on them to provide critical services in their communities.

We urge you to vote NO on AB 2855.

Respectfully,



Jan Masaoka
CEO, California Association of Nonprofits

cc: Assemblyman Jim Frazier
Members of the Assembly Privacy & Consumer Protection Committee
Jennifer Fearing, Sacramento Advocate, California Association of Nonprofits

Joined by the following 217 charity leaders and their organizations:

Susan Taylor
Executive Director
Actors and Others for Animals
North Hollywood, CA

Nancy McGee
CEO
Alliance for Nonprofit Excellence
Memphis, TN

Carolyn Phinney
President
AgLantis (501c-3)
Orinda, CA

Kristen Merrifield
CEO
Alliance of Arizona Nonprofits
Phoenix, AZ

Carolyn Phinney
President
AgLantis (501c-3)
Orinda, CA

Joel Kirsch
President
American Sports Institute
Mill Valley, CA

Virginia (Ginny) Krutilek
Treasurer
Alameda Homeless Network/Midway Shelter
Alameda, CA

Keith Wieser
Executive Director
Angels Nest TLP
Los Angeles, CA

Stephanie Meincke
President and CEO
Arkansas Nonprofit Alliance
Little Rock, AR

Sofia Klatzker
Executive Director
Arts for LA
Los Angeles, CA

Laurie Pitman
President of the Board
Arts for Oakland Kids
Oakland, CA

Janice Reyes
Co Founder & Co Director
Aspire Creative Arts Program
Anaheim, CA

Renita Verner
Founder
Autism Advocates in Action Support Group
Carson, CA

Adrienne Bell Cors
Co-founder
Axis Advocacy
Pasadena, CA

Peter Comiskey
Executive Director
Balboa Park Cultural Partnership
San Diego, CA

Alan Roselius
Chair of the Board
Berkeley Organizing Congregations for Action
Berkeley, CA

Kim Benson
Executive Director
Berkeley Student Cooperative
Berkeley, CA

Moza Mjasiri Cooper
Founder/CEO
Black Arts Los Angeles, Inc.
Los Angeles, CA

Moza Mjasiri Cooper
Founder/CEO
Black Arts Los Angeles, Inc.
Los Angeles, CA

Patricia Dixon
Executive Director
California Aquatic Therapy & Wellness Center,
Inc. DBA Pools of Hope
Long Beach, CA

Christopher Hoene
Executive Director
California Budget & Policy Center
Sacramento, CA

William Remak
Chairman of the Board/CEO
California Hepatitis C Task Force, Inc.
Petaluma, CA

Kathy Moore
Executive Director
California Partnership to End Domestic
Violence
Sacramento, CA

Chuck Mills
Director of Public Policy and Grants
California ReLeaf
Sacramento, CA

Kris Lev-Twombly
executive director
California State Alliance of YMCAs
Sacramento, CA

Aubrey Bergauer
Executive Director
California Symphony
Walnut Creek, CA

Sandra Nunez
Founder/CEO
Care of the Soul Foundation, Inc.
Lomita, CA

Nobuko Yamanobe
V. P. of Administrations
Catholic Big Brothers Big Sisters, Inc.
Los Angeles, CA

Cindy Duenas
Executive Director
Center for Human Services
Modesto, CA

Glen O'Gilvie
CEO
Center for Nonprofit Advancement
Washington District of Columbia, DC

Linda Czipo
Executive Director
Center for Non-Profits
Mercerville, NJ

Karen Schambach
President
Center for Sierra Nevada Conservation
Placerville, CA

Gina Guillemette
Director, Consulting Services
Center for Volunteer & Nonprofit Leadership
San Rafael, CA

Bruce Campbell
President
CFIDS & Fibromyalgia Self-Help Program
Palo Alto, CA

Robert Freiri
CEO
Chamberlain's Children Center
Hollister, CA

Mike Post
Executive Director
Chimineas Ranch Foundation
Winnetka, CA

Ann Woo
Executive Director
Chinese Performing Arts of America
San Jose, CA

Phil Friesen
President
Citadel Ministries, Inc.
Fresno, CA

Charles Duncombe
Producing Director
City Garage Theatre
Santa Monica, CA

Kelli Brown
Development Director
Coastal Kids Home Care
Salinas, CA

Mark Turner
Director of Public Policy
Colorado Nonprofit Association
Denver, CO

Thomas Tenorio
CEO
Community Action Agency of Butte County
Chico, CA

Karen Campbell
CEO/Founder of Community Counts Inc.
Community Counts Inc.
Santa Monica, CA

Eric Fischer
Chief Financial Officer
Community Housing Partnership
San Francisco, CA

Lyman Dennis
Executive Director
ConnectHealthcare
Fairfield, CA

Jeffrey Walter
Interim CEO
Connecticut Community Nonprofit Alliance, Inc.
Hartford, CT

Ken Webster
President
Contra Costa Youth Council
Lafayette, CA

Joelle Gallagher
Executive Director
Cope Family Center
Napa, CA

Melodee Fugate
Executive Director
Del Norte Child Care Council
Crescent City, CA

Charlaine Mazzei
Executive Director
Del Norte Senior Center, Inc. Redwood Cove
Community Center, Inc.
Crescent City, CA

John Baker
EVP Sector Advancement
Delaware Alliance for Nonprofit Advancement -
DANA
Wilmington, DE

Robin Snyder
Chief Finance & Administration Officer
Descanso Gardens Guild, Inc.
La Canada Flintridge, CA

Pat Smith
Executive Director
EarthShare California
San Francisco, CA

The Rev. Robert T. Fuentes
Executive Director
Faith in Action: Interfaith Volunteer Caregivers
of Solano County
Fairfield, CA

Patricia Braendel
Founder & President
Fallbrook Citizens' Crime Prevention Committee
Fallbrook, CA

Kevin Sharps
Executive Director
Fighting Back Partnership
Vallejo, CA

Salwa Kasabian
Executive Director
Folsom's Hope
Folsom, CA

Eric Weinheimer
President & CEO
Forefront
Chicago, IL

Karen Wade
President & CEO
Foundation for Successful Solutions
Inglewood/Los Angeles, CA

Lisa Kuhn
Executive Director
Foundation for Sustainable Development
San Francisco, CA

Christine Leigh-Taylor
Chair of Board
Four Paws To Freedom
Placerville, CA

Jan Minami
Trust Manager
Fresno Food Commons Fresno
Fresno, CA

Kurt Krzyzopolski
Treasurer
Glenwood Dads Club
SunValley, CA

Jonas Mok
VP, Operations & Finance
Global Citizen Year
Oakland, CA

Ginna Brelsford
Co-Executive Director
GSA Network
Oakland, CA

Lisa Maruyama
President & CEO
Hawaii Alliance of Nonprofit Organizations
Honolulu, HI

Abigail Karlin-Resnick
Executive Director
Health Connected
Redwood City, CA

Wendy Hileman
CEO/CFO
Healthy Adventures Foundation
San Diego, CA

Greggory Follett
Founder and President
Hope for Santa Maria
Santa Maria, CA

Krisana Tantivittoon
Director/Secretary
Hopkins Band and Orchestra Boosters
Fremont, CA

Charles Caldwell
President
Humboldt Skatepark Collective
McKinleyville, CA

Don Weisbrod
President
Ichthus International Inc.
Pasadena, CA

Janice Fulkerson
Executive Director, Idaho Nonprofit Center
Idaho Nonprofit Center
Boise, ID

Ronald Goldman
Executive Director
Infectious Disease Association of California
Los Angeles, CA

Melissa O'Connell
Operations Director
Inland Temporary Homes
Loma Linda, CA

David Garcelon
President
Institute for Wildlife Studies
Arcata, CA

Loella Haskew
Treasurer
Kennedy King Memorial Scholarship Fund
Martinez, CA

Danielle Clore
Executive Director/CEO
Kentucky Nonprofit Network
Lexington, KY

Jasna Baron
Director of Finance & Administration
KidWorks Community Development
Corporation
Santa Ana, CA

Stephanie Mardesich
Founder/Director/CEO
LA Harbor International Film Festival
San Pedro, CA

Sue Garrett
Treasurer
Lake County Theatre Company
Lakeport, CA

Eric Gurna
President & CEO
LA's BEST After School Enrichment Program
Los Angeles, CA

Heberto Sanchez
Founder/President
Latino Educational Fund
Los Angeles, CA

Salena Copeland
Executive Director
Legal Aid Association of California
Oakland, CA

Ash Chaudhry
Treasurer
Library & Literacy Foundation for San Joaquin
County
Stockton, CA

Gary Becks
President / CEO
Life Charities, Inc. DBA Rescue Task Force
San Bernardino, CA

Randy Stein
CEO
Lions Sight & Hearing Foundation of Southern
CA
Long Beach, CA

JC Strote
President
Lodi Community Art Center
Lodi, CA

Karen Jones
Executive Director/Program Manager
Long Term Care Ombudsman Services of San
Luis Obispo County
San Luis Obispo, CA

Kelly Pepper
President & CEO
Louisiana Association of Nonprofit
Organizations
Baton Rouge, LA

Jain Sekuler
Treasurer
Lummis Day Ccommunity Foundation
Los Angeles, CA

Scott Schnapp
Executive Director
Maine Association of Nonprofits
Portland, ME

Henry Bogdan
Director of Public Policy
Maryland Nonprofits
Baltimore, MD

Irwin Gubman
Board Treasurer and Secretary
Marin Villages
San Rafael, CA

Amie McClellan
Bookkeeper
Mateel Community Center
Redway, CA

Hillarie Beyer
Executive Director
McKinleyville Community Collaborative
McKinleyville, CA

Col Sinclair
Director
Meals on Wheels
Santa Maria Valley, CA

Donna Murray-Brown
President & CEO
Michigan Nonprofit Association
Lansing and Detroit, MI

Jon Pratt
Executive Director
Minnesota Council of Nonprofits
St. Paul, MN

Debra Watanuki
President
Mission Peak Wind Symphony
Fremont, CA

Sherry Rainey
Executive Director
Mississippi Center for Nonprofits
Jackson, MS

Liz Moore
Executive Director
Montana Nonprofit Association
Helena, MT

Leslie Dawson
Treasurer
Mount Diablo Interpretive Association
Walnut Creek, CA

David Richter
Treasurer
Mountain Ranch Youth Alliance
Mountain Ranch, CA

Patricia L. Anderson
Treasurer
Mountain Valley Elder Care
Hayfork, CA

Greta Nagel
Founder and CEO
Museum of Teaching and Learning
Fullerton, CA

Evie Ayers
Executive Director
Music in the Vineyards Inc.
Napa, CA

Kathleen Dreessen
Executive Director
Napa Valley Community Housing
Napa, CA

David Thompson
Vice President of Public Policy
National Council of Nonprofits
Washington, DC

Dominick Spatafora
President
Neuropathy Action Foundation
Santa Ana, CA

David Kennemer
Associate Executive Director
New Advances for People with Disabilities
Bakersfield, CA

Christiaan Canter
Chief Development Officer
New Door Ventures
San Francisco, CA

Jonathan Wang
Director of Finance and Administration
New Door Ventures
San Francisco, CA

Kathleen Reardon
CEO
New Hampshire Center for Nonprofits
Concord, NH

David Ashby
Executive Director
New Morning Youth & Family Services
Placerville, CA

Peter McCarthy
Policy Associate
New York Council of Nonprofits
Albany, CA

Nancy Marohn
Executive Director
Nipomo Area Recreation Association
Nipomo, CA

Anne Hindery
CEO
Nonprofit Association of the Midlands
Omaha, NE

Claire Knowlton
Director
Nonprofit Finance Fund
Los Angeles, CA

David Heinen
Vice President for Public Policy and Advocacy
North Carolina Center for Nonprofits
Raleigh, NC

Dana Schaar Jahner
Executive Director
North Dakota Association of Nonprofit
Organizations
Bismarck, ND

Denise Kelly
Executive Director
North Peninsula Food Pantry & Dining Center
of Daly City
Daly City, CA

Kellan Christopher
Center Director
O'Hanlon Center for the Arts
Mill Valley, CA

Marnie Taylor
President and CEO
Oklahoma Center for Nonprofits
Oklahoma City, OK

Kathy McAdara
Executive Director
Operation SafeHouse
Riverside, CA

Michael Morris
Executive Director
Orchard Valley Fine Arts Foundation, Inc.
Santa Clara, CA

Janet Frazier
Board Member
Our Healing Hearts
Oakley, CA

Cindy Abbott
President
Pacifica's Environmental Family
Pacifica, CA

Sheryl Turner
Executive director
Pasadena YouthBuild
Pasadena, CA

Ginny Connell
Executive Director
PDAP of Ventura County, Inc.
Camarillo, CA

Heather Cleary
Associate Executive Director
Peninsula Family Service
San Mateo, CA

Rob Lajoie
Director, Financial Empowerment Program
Peninsula Family Service
San Mateo, CA

Anne Gingerich
Executive Director
Pennsylvania Association of Nonprofit
Organizations
Harrisburg, PA

Mercy Martinez
Office Manager
People Acting in Community Together
San Jose, CA

John Mangum
President & Artistic Director
Philharmonic Society of Orange County
Irvine, CA

Dianna Schepers
Public Relations Manager
Pittsburg Community Theatre
Pittsburg, CA

Betty Brown
Executive Manager
Pittsburg Community Theatre
Pittsburg, CA

Steven Mergogey-Conti
Media Coordinator
Pittsburg Community Theatre
Pittsburg, CA

Mark Hancock
Executive Director
Point Arena Lighthouse
Point Arena, CA

Felicia Won
Accounting Assistant
Presidio Graduate School
San Francisco, CA

Santhi Perumal
CFO
Presidio Graduate School
San Francisco, CA

Trip Oldfield
Executive Director
Program for Torture Victims
Los Angeles, CA

Rob Watilo
Director
Progressive Employment Concepts, Inc.
Citrus Heights, CA

Robin Ruhwedel
Managing Director
Project High Hopes
Escondido, CA

Michael Weekes
President/CEO
Providers' Council (Massachusetts)
Boston, MA

Beverley Jackson
Executive Director
Rebuilding Together Silicon Valley
San Jose, CA

Ken Goldstein
Executive Director
Recovery Cafe San Jose
San Jose, CA

Roberta Lyons
President
Redbud Audubon
Clearlake, CA

Bruce Edmundson
Treasurer
Redwood Bluegrass Associates
Mountain View, CA

Cathy Bonser
Executive Director
Redwood Parks Association
Crescent City, CA

Robin Whittington
Treasurer
Riverside Museum Associates
Riverside, CA

Wendy Winks
Executive Director
Rock School Scholarship Fund
Los Angeles, CA

Mark Roseman
Member of the Board of Directors
Role Players Ensemble
Danville, CA

Rona Barrett
CEO & Exec Dir.
Rona Barrett Foundation
Santa Ynez, CA

Jim Brown
Executive Director
Sacramento Area Bicycle Advocates
Sacramento, CA

Michael Dennis
President
Sacramento International Gay & Lesbian Film
Festival
Sacramento, CA

Lorna Xing
Principal
San Diego Hua Xia Chinese School
San Diego, CA

Dalouge Smith
President & CEO
San Diego Youth Symphony and Conservatory
San Diego, CA

Sarah Burton
Executive Director
San Francisco SAFE, Inc.
San Francisco, CA

Brandy Kuentzel, Esq.
General Counsel and Director of Advocacy
San Francisco SPCA
San Francisco, CA

Arthur Takayama
President, Board of Directors
Sanchez Art Center
Pacifica, CA

Tracy Wingrove
Executive Director
Santa Clara City Library Foundation & Friends
Santa Clara, CA

Amy Little
Bookkeeper
School of Unity and Liberation
Oakland, CA

Ben Delaney
Executive Director
SCRAP
San Francisco, CA

Jean Wegener
Executive Director
Serving People In Need (dba SPIN)
Costa Mesa, CA

Paul Ash
Executive Director
SF-Marin Food Bank
San Francisco, CA

Mary Brown
President & CEO
Sickle Cell Disease Foundation of CA
Ontario, CA

Pavel Kravchuk
President
Slavic Chorale
Folsom, CA

MaryAnne Jordan
Board President
Solano Symphony Orchestra
Fairfield, CA

Samuel Mejia
President / CEO
Sons Of Charity Inc
San Diego, CA

Bari Scott
Executive Director
SoundVision Productions
Berkeley, CA

Madeleine McGee
President
South Carolina Association of Nonprofit
Organizations
Charleston, SC

Rosemarie Cook-Glover
President
Southeast Symphony Association, Inc.
Los Angeles, CA

Regina Birdsell
CEO
Southern California Center for Nonprofit
Management
Los Angeles, CA

Lisa McBride
Founder/Executive Director
Special Kids Foundation, Inc.
Discovery Bay, CA

Akuyoe Graham
Executive Director
Spirit Awakening Foundation
Los Angeles, CA

Ronald Nadeau
Director
Spirit House Center For Attitudinal Healing
Fort Bragg, CA

Marcie Hodge
Executive Director
St. John Boys Home, Inc.
Oakland, CA

Brenda Dahl
Director of Human Resources
Sunny Hills Services
San Anselmo, CA

Mary Denton
CEO
Sunny Hills Services
San Anselmo, CA

Lisa Wolter
Executive Director
Susan G. Komen Orange County
Costa Mesa, CA

Poppy Davis
Program Manager
Sustainable Agriculture Education (SAGE)
Berkeley, CA

Alexandra Pierangeli
Executive Director
Symphony of the Redwoods
Fort Bragg, CA

Kathleen Montgomery
Executive Director
Teacher Resource Center of the North Bay
Napa, CA

Don Falk
Chief Executive Officer
Tenderloin Neighborhood Development
Corporation (TNDC)
San Francisco, CA

Kim Kolpin
Executive Director
The Bolsa Chica Land Trust
Huntington Beach, CA

Sue Tsuda
President
The Center for Healthy Generations
Yucca Valley, CA

Peggy Alreck-Anthony
Director of Operation
The Down Syndrome Connection of the Bay
Area
Danville, CA

Dawn Watkins
Executive Director
The Eel River Multigenerational Center
Fortuna, CA

Laurie Wolf
President and CEO
The Foraker Group - Alaska's State Nonprofit
Association
Anchorage, AK

Courtney Fern
California State Director & Community
Relations Liason
The Humane Society of the United States
Los Angeles, CA

Janet Frazier
Executive Director
The Network of Care
Oakley, CA

Jim White
Executive Director
The Nonprofit Association of Oregon
Portland, OR

Maria Picar
Executive Director
The OMI Cultural Participation Project
San Francisco, CA

Suzy Lee
Executive Director
The Place Within Counseling Folsom
Folsom, CA

Megan Isadore
Executive Director
The River Otter Ecology Project
Forest Knolls, CA

Andrea Schmitt
Interim Executive Director
The Soldiers Project
North Hollywood, CA

Angie Carmignani
Executive Director
The Taylor Family Foundation
Livermore, CA

Brad Erickson
Executive Director
Theatre Bay Area
San Francisco, CA

Kathleen Baushke
Executive Director
Transition House
Santa Barbara, CA

Patrick Santana
Owner
Traverso Santana Design
San Francisco, CA

Glen Newhart
President
Tri-City Hospital Foundation
Oceanside, CA

Kim Baenisch
Executive Director
Trips for Kids
San Rafael, CA

C. Frank Pulliam
CEO
Triumphant Life
Apple Valley, CA

Llyn Smith
Treasurer
Tustin Preservation Conservancy
Tustin, CA

Amy Fletcher
Grants and Evaluation Manager
Women's Economic Ventures
Santa Barbara, CA

Della Hodson
President
United Way of Kern County
Bakersfield, CA

Lizzie Lara
Development Associate
World of Children
Dublin, CA

Judy Darnell
Vice President of Public Policy
United Ways of California
South Pasadena, CA

Jody Shields
Managing Director
Wyoming Nonprofit Network
Cheyenne, WY

Kate Rubalcava
Chief Executive Officer
Utah Nonprofits Association
Salt Lake City, UT

Abel Guzman
Executive Director
Youth 2 Leaders Education Foundation
Bakersfield, CA

Alison McCaffree
Executive Director
Washington Nonprofits
Tacoma, WA

Gioia Pastre
Vice President of Development
Villa Esperanza Services
Pasadena, CA

Dee Dee Robillard
Program Coordinator
Volunteer Council of the East Bay (VCEB)
Walnut Creek, CA

Katelyn Rispoli
Executive Director
We Are the Next
Long Beach, CA

Brian Beveridge
Co-Exec Director
West Oakland Environmental Indicators Project
Oakland, CA

Laura Lee Haddad
Executive Director
West Virginia Nonprofit Association
Lewisburg, WV