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***CALIFORNIA CATHOLIC
CONFERENCE***

***REGULATIONS REGARDING
INCLUSION OF POLITICAL CONTENT
IN THE CHURCH'S REGULARLY
PUBLISHED PERIODICALS***



CALIFORNIA CATHOLIC CONFERENCE
OFFICE OF GENERAL COUNSEL

**REGULATIONS REGARDING THE INCLUSION OF POLITICAL CONTENT IN
THE CHURCH'S REGULARLY PUBLISHED PERIODICALS**

The political process in California is highly regulated and subject to a complex and comprehensive set of rules and requirements applicable to just about anyone—candidates, donors, and activists alike—engaging in political activities. Under this regulatory scheme, if any person or entity receives or spends \$1,000 in a year for political activities the person or entity will be required to register as a committee and file reports disclosing what money they've received and spent for political activities.

But, some activities are exempt from reporting requirements and are not counted toward this \$1,000 threshold. One of these exemptions permits an organization to discuss—and even support or oppose—pending ballot measures in the regularly published newsletters and newspapers it sends to its members, employees, affiliates and subscribers. This exemption permits a parish or (arch)diocese to send periodicals containing political content to individuals affiliated with the Church, such as registered parishioners and people who have subscribed to Church publications. The parishes and the Conference will not be deemed to be acting as a single entity, and a parish will need to register as a committee only if it meets the \$1,000 per year threshold. For this exception to apply it is important that the following limits be observed:

- The periodical (whether a newsletter, parish bulletin, or (arch) diocesan newspaper) must be published on a regular schedule.
 - The circulation must be limited to those who are employees of or are affiliated with the Church and to those who request or purchase the publication (e.g., registered parishioners, employees, people who have subscribed to or requested the publication, and perhaps the families of Catholic school students). It may not be disseminated otherwise. The fact that someone has donated funds at some time, or is on a mailing list, is not sufficient to qualify.
 - It would be best if the political content is incorporated into the publication in the same manner as any other article.
 - If, however, the political content is a separate page or flyer inserted into the publication, or causes the publication to expand in style, size, or format, the extra expense caused by this change must be accounted for and will count toward whether the parish has spent \$1,000 in the calendar year on political activities.
 - The materials that touch upon political matters must be those prepared by an official agency of the Church such as the California Catholic Conference, Catholic Charities or the Alliance of Catholic Health Care. They must not include campaign materials, petitions or contribution envelopes provided by an outside organization, as the cost of printing, stuffing, and mailing them will have to be reported as political “expenditures” and count toward the \$1,000 threshold, or be disclosed as a contribution to the outside organization on its campaign reports.
 - There must be no direct or indirect urging of support of or opposition to *candidates* or *political parties*. The federal tax exemption applicable to the Church permits discussion of *issues*, but does not permit campaigning for or against *candidates*.
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