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**Sent:** Wednesday, September 02, 2015 12:35 PM

**To:** Carter, Lee

**Cc:** [Jackie.Jackson@treasury.gov](mailto:Jackie.Jackson@treasury.gov)

**Subject:** RE: Review and Assessment of California SB 443 - Amended 8/25/15

Hi Lee, I had replied to an email chain on this issue but I think at that point you had been removed from the chain since there was some internal communications – my apologies for not catching that. The answer to both questions, unfortunately, is likely “no.” I highly doubt our federal agencies can figure out whether a conviction occurred in any timely manner. I’m not sure they would have the resources, desire, or technical capability even they have the first two. And I think the timing issue is a big one that cannot be overcome because our 60 day timeline is the crucial first step in our internal accounting controls. Finally, it seems the legislation, in effect, takes decision-making authority away from Treasury. Accordingly, I think I would still advise our policy officials here that it would be prudent to not share with CA agencies should this law be passed.