

# Memorandum

Marian Ash, Chief  
Political Reform Division  
Secretary of State's Office

Date : May 2, 1984

T-84-127

*Jeanne Pritchard*

From : FAIR POLITICAL PRACTICES COMMISSION  
Jeanne Pritchard

Subject : Incomplete Campaign Disclosure Statements

Your staff recently asked for FPPC guidance in determining the procedures to be followed when grossly incomplete campaign disclosure statements are filed. For example, your office has received statements which provide only summary page information (aggregate receipts and expenditures) but no itemized information regarding receipts and expenditures.

The FPPC staff has determined that such incomplete statements should not be rejected or returned to the filer, but should be file-stamped and logged in in the same manner as other filings. In addition, such statements should not be considered "non-filings" for the purpose of assessing late fines.

We suggest that a letter be sent to the candidate or committee requesting that an amendment providing all of the required information be filed within 10 days, and indicating that if the required information is not filed within 10 days the statement will be referred to the FPPC Enforcement Division. Please send a copy of your letter and the incomplete filing to the Enforcement Division. In addition, if an amendment is not filed within 10 days, please notify the Enforcement Division.

Such filing constitutes seriously inadequate campaign disclosure and our office will take into consideration several factors in determining what action will be taken. Such factors may include, among other factors, the volume and amount of receipts and expenditures not properly reported, whether it is the first time the candidate or committee has filed an incomplete statement, and the proximity of the filing deadline to the election.

Thank you for bringing this to our attention. Please call me if you have any questions.

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