

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

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March 7, 1985

Anthony C. Manzella, Jr.
Attorney at Law
727 West 7th Street, Ste. 722
Los Angeles, CA 90017

Re: Our File No. A-85-020

Dear Mr. Manzella:

I apologize for the delay in responding to your letter of January 29, 1985 which requested advice with respect to the campaign disclosure provisions of the Political Reform Act (Government Code Sections 81000-91014).

Your letter correctly states that interest income received on a committee's bank account would not trigger the requirement to file a semi-annual campaign disclosure statement. Government Code Section 84200 requires committees to file semi-annual statements if expenditures have been made or contributions have been received or made. Interest earned on a bank account is not a "contribution" as defined in Government Code Section 82015 and FPPC regulation 2 Cal. Adm. Code Section 18215. Therefore, the Friends of Judge Torres Committee was not required to file a semi-annual statement for the period July 1, 1984 through December 31, 1984 because its only activity during the period was receipt of interest on the committee's bank account.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Carla J. Wardlow".

Carla J. Wardlow
Political Reform Consultant

LAW OFFICES

ANTHONY C. MANZELLA, JR.

SUITE 722 ROOSEVELT BUILDING
727 WEST SEVENTH STREET
LOS ANGELES, CALIFORNIA 90017

FEB 1 1 39 PM '85

TELEPHONE
(213) 623-4337

OF COUNSEL
ANTHONY C. MANZELLA

OUR FILE NO. _____

January 29, 1985

Fair Political Practices Commission
1100 K Street
Sacramento, CA 95814

Dear Sir or Madam

Friends of Judge Torres
ID# 840835

I am the treasurer of the mentioned committee. Our last campaign disclosure statement was filed 7-31-84, covering the reporting period 1-1-84 to 6-30-84.

Since 6-30-84 (the end of that reporting period), the committee has made no expenditures and has received no contributions. The cash on hand at the end of that reporting period, however, was placed in an interest bearing account and has earned interest in the sum of \$16.60 during the reporting period 7-1-84 to 12-31-84.

I have been told by an FPPC representative that our committee need not file a semi-annual statement because, absent contributions or expenditures, the earning of interest alone does not constitute "campaign-related activity." In order that we may be sure we are in full compliance with your requirements, please send written confirmation of your opinion.

Thank you for your courtesy and cooperation.

Very truly yours



ANTHONY C. MANZELLA, JR.

ACM:rc