

State of California



Fair Political Practices Commission

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

Technical Assistance •• Administration •• Executive/Legal •• Enforcement
(916) 322-5662 322-5660 322-5901 322-6441

July 31, 1985

Douglas DeYoung, Treasurer
20th Assembly District Democratic Committee
888 Holly Road
Belmont, CA 94002

Re: FPPC Advice No. A-85-150

Dear Mr. DeYoung:

Your letter of January 31, 1985, addressed to the Secretary of State's office was referred to the Fair Political Practices Commission for response on July 2, 1985. I apologize for the delay in responding to your questions.

Government Code Section 84211(j) does require contributions of \$100 or more be itemized on campaign statements providing "...the date of the contribution, the cumulative amount of contributions made to a candidate, elected officer or committee, the full name of the candidate..."

However, the Commission's staff has determined that contributions made to federal candidates are not required to be itemized but rather may be disclosed in a lump sum with a notation that the expenditure represents contributions to federal candidates. The rationale for this is that federal candidates are required under the federal election laws to disclose all contributions they receive on FEC campaign forms which are also filed with the Secretary of State's office. To require the itemization pursuant to the Political Reform Act of contributions of \$100 or more made to federal candidates does not further the intent of the Act because anyone wishing to see what contributions a federal candidate has received can do so by looking at the FEC campaign statements.

The letters dated January 16 and 17, 1985, from the Secretary of State's office are requesting that you amend the 450s filed by the 20th Assembly District Democratic Committee because these statements itemized contributions to federal candidates. I am asking the Secretary of State's office to reconsider their request for the amendments covered in the letters of January 16 and 17, 1985. In the future, however, if you wish, you may report contributions to federal candidates in the manner described above.

Douglas DeYoung
July 31, 1985
Page 2

Also, as a reminder, you are only required to itemize contributions which cumulatively reach \$100 within a calendar year. On your statement filed August 1, 1984, covering the period January 1 through June 30, 1984, you itemized two \$50.00 contributions. Contributions under \$100 may be reported on Line 2, Part IV-Summary, Expenditures Under \$100 (Not Itemized).

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

Sincerely,



Mary Ann Kvasager
Political Reform Consultant
Technical Assistance and Analysis
Division

MAK:kt

cc: Gloria Gilmore, Secretary
of State's Office, Political
Reform Division

TO: [] JEANNE [] JAY () DAN
[] LYNN [] BARBARA () JOHN K
[] ROGER [] CARLA () MARY ANN
[] HELEN [] OTHER _____

FROM: Kvasager

DATE: 1/31/85
(we received from SOS
July 2, 1985.)

[] TELEPHONE ADVICE - SEE BELOW

[*] CORRESPONDENCE ADVICE - SEE ATTACHED DRAFT

(IF YOU HAVE ANY COMMENTS, NOTIFY ADVISOR WITHIN 1 DAY)

FILE LOCATION: _____

INCLUDE IN ADVICE PACKAGE: YES [] NO []

~~CALLER~~ Douglas DeYoung, Treasurer

REPRESENTING 20th Assembly Dist. Democratic Committee

PHONE NUMBER: _____

QUESTION: How to report contributions made by the 20th Assembly
District Democratic Committee to federal candidates.

ANSWER: Contributions to federal candidates are not required to
be itemized but rather disclosed on Schedule E in a
lump sum with a notation that the expenditures represent
contributions to federal candidates.

RE: TWENTIETH ASSEMBLY DISTRICT DEMOCRATIC COMMITTEE ID# 801476

888 Holly Road
Belmont CA 94002
January 31, 1985

Ms. Marian Ash/Ms. Gloria Gilmore
Political Reform Division - Secretary of State
P. O. Box 1467
Sacramento, CA 95807

RECEIVED
AND FILED
in the office of the Secretary of State
of the State of California

FEB 05 1985

MARCH FONG EU, Secretary of State

Dear Ms. Ash & Ms. Gilmore:

This acknowledges you letters of January 16 & 17
(copies attached) requesting amendments to my
campaign disclosure statements of June 28 and
October 23, 1984.

Your letter states in part:

Contributions to candidates for federal office
should be disclosed in a lump sum on Section I,
"Expenditures and Contributions Made To:"

I have several questions, comments, and suggestions
concerning this.

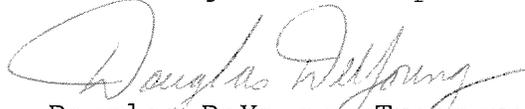
1. I cannot find the above statement in any of my
reference documents pertaining to the preparation
of the report. I'm not saying it doesn't appear.
I just can't find it. Please advise where it
appears. *not there*
2. The statement is inconsistent with the general
rule that a transaction or series of transactions
cumulating \$100.00 or more in a calendar year with
a given entity must be itemized. Why are you
making this exception? *right*
3. I have been under the impression that transactions
between committees should be itemized regardless of ^{no}
the amount involved. Most treasurers operate under
this assumption.
4. I have been under the impression that while treasurers
must not fail to itemize those transactions which are
required to be itemized, this does not mean that trea-
surers must not itemize transactions which are not
required to be itemized. We often desire to make in-
formation available to the general public above and

beyond that required by law. In this case the 20th Assembly District Democratic Committee wishes to make its financial support to Martin Carnoy a matter of public record. Treasurers often like to itemize contributions of less than \$100.00 in order to demonstrate a broad base of local support or highlight some other point. I realize that there must be a practical limit to this so that required itemized transactions are not lost in a mass of trivial detail and reports do not become too bulky, but most treasurers won't go to such excesses anyway.

5. I'm not sure exactly what you are asking me to do in this particular situation. Your letters refer to "candidates" (plural) for federal office. There is only one candidate (singular) for federal office on each report. What are you asking me to lump together? The \$200.00 contribution on the 10/23/84 report to the United Democratic Campaign of San Mateo County (of which I am also treasurer) cannot be broken down between federal and state candidates. This committee operated a storefront in the City of San Mateo servicing all Democratic Party Candidates (both state and federal) appearing on the November 1984 ballot in San Mateo County. It did not make any contributions to or expenditures for specific individual candidates. It operated independently of any other committee. It is registered with and submits reports to both the Federal Election Commission and the California Secretary of State. *copy not enclosed*
6. In my opinion the amendment for which you are asking does not serve any constructive purpose and simply creates unnecessary paperwork. An amendment which provides previously omitted data and/or corrects previous erroneous data serves a useful purpose. On the other hand we should not clutter the system with amendments which, from a practical standpoint, simply advise the reader of the amendment to disregard a small amount of extra information on a previous document which must remain on file anyway. *Correct*
7. Thank you for your information relative to the Federal Election Commission. As previously noted I am also treasurer of a committee registered with the FEC, so I am generally familiar with their rules. The 20th A/D Democratic Committee has never reached the threshold requiring it to register with and report to the FEC.

I have no particular objection to filing these amendments if you will make it clear what you are asking for.

Please, however, give some thought to the points raised in this letter.


Douglas DeYoung, Treasurer
20th Assembly District
Democratic Committee

P. S. My phone number is 415-592-0888.



March Fong Eu
Secretary of State

1230 J Street
P.O. Box 1467
Sacramento, California 95807

POLITICAL REFORM DIVISION
(916) 322-4880

January 16, 1985

Mr. Douglas DeYoung, Treasurer
Twentieth Assembly District Democratic
Committee, ID# 801476
888 Holly Road
Belmont, CA 94002

Dear Mr. DeYoung:

Thank you for filing your Form 450, executed on October 23, 1984, for the reporting period July 1, 1984 through October 20, 1984. As required by the Political Reform Act of 1974, we have reviewed your statement to determine whether it conforms on its face with the disclosure requirements.

We have noted the following to assist you in complying with the requirements of the law.

Disclosure of Contributions to Candidates for Federal Office

Contributions to candidates for federal office should be disclosed in a lump sum on Section I, "Expenditures and Contributions Made To." To determine any duties you may have under the Federal Election Campaign Act, I recommend you contact the Federal Election Commission at 1325 K Street, N.W., Washington, D.C. 20463; toll free (800) 424-9530.

Enclosed is an Amendment to Campaign Disclosure Statement, which should be completed and filed to reflect any changes to your original campaign statement. Copies of your amendment should be filed with all offices that received copies of the statement originally filed. Please reply within fifteen days to this request.

If you have any questions, please call Gloria Gilmore at (916) 322-0395.

Sincerely,

A handwritten signature in cursive script that reads "Marian Ash".

MARIAN ASH, Assistant Chief
Political Reform Division

Enclosure

MA:dlh



March Fong Eu
Secretary of State

1230 J Street
P.O. Box 1467
Sacramento, California 95807

POLITICAL REFORM DIVISION
(916) 322-4880

January 17, 1985

Mr. Douglas DeYoung, Treasurer
Twentieth Assembly District Democratic
Committee, ID# 801476
888 Holly Road
Belmont, CA 94002

Dear Mr. DeYoung:

Thank you for filing your Form 450, executed on July 28, 1984, for the reporting period January 1, 1984 through June 30, 1984. As required by the Political Reform Act of 1974, we have reviewed your statement to determine whether it conforms on its face with the disclosure requirements.

We have noted the following to assist you in complying with the requirements of the law.

Disclosure of Contributions to Candidates for Federal Office

Contributions to candidates for federal office should be disclosed in a lump sum on Section I, "Expenditures and Contributions Made To." To determine any duties you may have under the Federal Election Campaign Act, I recommend you contact the Federal Election Commission at 1325 K Street, N.W., Washington, D.C. 20463; toll free (800) 424-9530.

Enclosed is an Amendment to Campaign Disclosure Statement, which should be completed and filed to reflect any changes to your original campaign statement. Copies of your amendment should be filed with all offices that received copies of the statement originally filed. Please reply within fifteen days to this request.

If you have any questions, please call Gloria Gilmore at (916) 322-0395.

Sincerely,

MARIAN ASH, Assistant Chief
Political Reform Division

Enclosure

MA:dlh



**RECIPIENT COMMITTEE CAMPAIGN
STATEMENT - SHORT FORM**
(Government Code Section 84200-84217)

Form 450
1984

For use by recipient committees which do not receive contributions or loans from any single source totaling \$100 or more. Recipient committees which receive individual or cumulative contributions or loans of \$100 or more from a single source must file Form 420.

In the office of the Secretary of State of the State of California

**RECEIVED
AND FILED**

AUG 1 1984

MARSHALL M. FREEMAN, Secretary of State
PM 7:30-84

(Type or Print in Ink)

Statement covers period from 1-1-84 through 6-30-84

| | | | | | | | |
|---|--|------------------------|-------------------------|---|----------------------------------|------------------------------|--|
| NAME OF COMMITTEE: <u>Twentieth Assembly District Democratic Committee</u> | | | | | | I.D. NUMBER <u>801476</u> | |
| ADDRESS OF COMMITTEE: NO. AND STREET <u>888 Holly Road</u> | | CITY <u>Belmont</u> | STATE <u>CA</u> | ZIP CODE <u>94002</u> | AREA CODE <u>415-592-0888</u> | PHONE NUMBER | |
| NAME OF TREASURER: <u>Douglas DeYoung</u> | | | | | | | |
| PERMANENT ADDRESS OF TREASURER: NO. AND STREET <u>888 Holly Road</u> | | CITY <u>Belmont</u> | STATE <u>CA</u> | ZIP CODE <u>94002</u> | AREA CODE <u>415-592-0888</u> | PHONE NUMBER | |
| DATE OF ELECTION (MO., DAY, YR.) (IF APPLICABLE) <u>Not Applicable</u> | | | TOTAL PAGES <u>2</u> | SPONSORING ORGANIZATION (IF APPLICABLE) | | | |

I EXPENDITURES AND CONTRIBUTIONS MADE TO: (Amounts may be rounded off to whole dollars)

| OFFICIAL USE ONLY | DATE | NAME & ADDRESS OF PAYEE (If committee, also enter I.D. No. or Treasurer's name and address) | DESCRIPTION OF EXPENDITURE OR CONTRIBUTION MADE | NAME OF CANDIDATE & OFFICE OR NAME OF BALLOT MEASURE & BALLOT NUMBER OR LETTER | Check one | | AMOUNT | CUMULATIVE AMOUNT |
|-------------------|------|---|---|--|-----------|--------|--------|-------------------|
| | | | | | Support | Oppose | | |
| | 4-13 | LePore for Assembly 507 Anita Lane Millbrae CA 94030 ID #771713 | Contribution 20th AD Race | Art LePore | X | | 50.00 | 50.00 |
| | 4-13 | Carnoy for Congress P. O. Box 8510 Stanford CA 94305 ID #C00181677 | Contribution 12th CD Race | Martin Carnoy | X | | 50.00 | 50.00 |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Attach additional information on separate fully dated continuation sheets.

SUBTOTAL (Carry with any additional subtotals to Line 1, Part IV) \$ 100.00

*Date is required only for payments which are contributions or independent expenditures.

YOU MUST COMPLETE THE SUMMARY AND VERIFICATION ON PAGE 2

| | | | | |
|-------------------|---|---|---|---|
| OFFICIAL USE ONLY | C | D | E | F |
|-------------------|---|---|---|---|

For information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," Part X.

LOANS MADE TO: (Amounts may be rounded off to whole dollars)

| DATE | FULL NAME & ADDRESS OF RECIPIENT (If committee, also enter I.D. Number or Treasurer's name and address) | NAME OF CANDIDATE AND OFFICE OR NAME OF BALLOT MEASURE AND BALLOT NUMBER OR LETTER | | INTEREST RATE | AMOUNT OF LOAN | CUMULATIVE AMOUNT |
|---|--|--|--|---------------|----------------|-------------------|
| | | Check one Support Oppose | | | | |
| | | | | | | |
| | | | | | | |
| Attach additional information on appropriately labeled continuation sheets. | | | | | | |
| SUBTOTAL (Carry with additional subtotals to Line 3, Part IV) \$ | | | | | | |

III LOANS REPAID BY: (Amounts may be rounded off to whole dollars)

| FULL NAME AND ADDRESS OF DEBTOR PLUS PERSON WHO REPAID THE LOAN IF DIFFERENT (If the loan was made to a committee, list the committee's name, address and I.D. Number. If the committee I.D. Number is unknown list the treasurer's full name and street address.) | AMOUNT REPAID THIS PERIOD | UNPAID BALANCE |
|---|---------------------------|----------------|
| | | |
| | | |
| Attach additional information on appropriately labeled continuation sheets. | | |
| SUBTOTAL (Carry with additional subtotals to Line 5, Part IV) \$ | | |

IV SUMMARY

EXPENDITURES

| | |
|---|-----------|
| 1. Expenditures of \$100 or more this period (Part I) | \$ 100.00 |
| 2. Expenditures under \$100 (Not itemized) | 221.39 |
| 3. Loans made this period (Part II) | 0.00 |
| 4. Subtotal (Line 1 + 2 + 3) | \$ 321.39 |
| 5. Loans repaid this period (Part III) | 0.00 |
| 6. Net expenditures this period (Line 4 - 5 may be negative amount) | \$ 321.39 |
| 7. Cumulative expenditures from prior statement | 0.00 |
| 8. Cumulative expenditures to date (Line 6 + 7) | \$ 321.39 |

RECEIPTS

| | |
|--|-----------|
| 9. Monetary contributions received this period. | \$ 300.00 |
| 10. Non-monetary contributions received this period | 0.00 |
| 11. Cumulative total from previous period | 0.00 |
| 12. Cumulative contributions received to date (Line 9 + 10 + 11) | \$ 300.00 |

CASH FLOW STATEMENT

| | |
|--|-----------|
| 13. Cash on hand at beginning of period | \$ 752.37 |
| 14. Cash receipts this period (Line 5 + 9) | 300.00 |
| 15. Miscellaneous adjustments to cash | 0.00 |
| 16. Cash expenditures this period (Line 4) | 321.39 |
| 17. Cash on hand at end of period (Line 13 + 14 + 15 - 16) | \$ 730.98 |

VERIFICATION

This committee has not received any contributions, cumulative contributions, or loans from a single source totaling \$100 or more. I declare under penalty of perjury that this campaign statement is true, correct and complete to the best of my knowledge and that I have used all reasonable diligence in its preparation.

Executed on 7-28-84 at Belmont, CA by Douglas DeYoung
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

Executed on _____ at _____ by _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE OR OFFICER/HOLDER)



Form 450
1984

RECIPIENT COMMITTEE CAMPAIGN STATEMENT - SHORT FORM (Government Code Section 84200-84217)

For use by recipient committees which do not receive contributions or loans from any single source totaling \$100 or more. Recipient committees which receive individual or cumulative contributions or loans of \$100 or more from a single source must file Form 420.

(Type or Print in Ink)

Statement covers period from 7-1-84 through 10-20-84

RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
OCT 26 1984
MARTIN FONG, III, Secretary of State
OFFICIAL USE ONLY
PM 10:23-84
I.D. NUMBER
801476

| | | | | | | |
|--|--|------------------|---|-------------------|-----------------------|--------------------------|
| NAME OF COMMITTEE: Twentieth Assembly District Democratic Committee | | | | | I.D. NUMBER 801476 | |
| ADDRESS OF COMMITTEE: NO. AND STREET 888 Holly Road | | CITY Belmont | STATE CA | ZIP CODE 94002 | AREA CODE 415 | PHONE NUMBER 592-0888 |
| NAME OF TREASURER: Douglas DeYoung | | | | | | |
| PERMANENT ADDRESS OF TREASURER: NO. AND STREET 888 Holly Road | | CITY Belmont | STATE CA | ZIP CODE 94002 | AREA CODE 415 | PHONE NUMBER 592-0888 |
| DATE OF ELECTION (MO., DAY, YR.): (IF APPLICABLE) November 6, 1984 | | TOTAL PAGES 2 | SPONSORING ORGANIZATION (IF APPLICABLE) | | | |

EXPENDITURES AND CONTRIBUTIONS MADE TO: (Amounts may be rounded off to whole dollars)

| OFFICIAL USE ONLY | DATE | NAME & ADDRESS OF PAYEE (If committee, also enter I.D. No. or Treasurer's name and address) | DESCRIPTION OF EXPENDITURE OR CONTRIBUTION MADE | NAME OF CANDIDATE & OFFICE OR NAME OF BALLOT MEASURE & BALLOT NUMBER OR LETTER | Check one Sup- port | Op- pose | AMOUNT | CUMULATIVE AMOUNT |
|---|-------|--|---|--|-------------------------------------|--------------------------|--------|-------------------|
| | 7-28 | Gregorio for Senate Committee, 361 Ulmer Court, Redwood City, CA 94061 ID#741509 | Contribution | Arlen Gregorio State Senator | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 50.00 | 150.00 |
| | 10-5 | | | | | | 100.00 | |
| | 10-5 | Friends to Elect Art LePore, 2222 El Camino Real, San Mateo, CA ID#771713 | Contribution | Art LePore State Assembly | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 100.00 | 150.00 |
| | 10-8 | Carnoy for Congress P. O. Box 8510, Stanford, CA 94305 ID# C00181677 | Contribution | Martin Carnoy Congress | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 100.00 | 250.00 |
| | 10-10 | | | | | | 100.00 | |
| | 10-8 | United Democratic Campaign of San Mateo County, 888 Holly Road, Belmont, CA 94002 ID# C00189704, 841670 | Contribution | All Democratic Candidates | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 200.00 | 200.00 |
| | | NOTE: THERE WAS NO REPORT FOR THE PERIOD 7-1-84 THRU 9-17-84 BECAUSE AS OF 9-17-84 NEITHER YEAR-TO-DATE RECEIPTS OR EXPENDITURES HAD REACHED \$500.00. | | | | | | |
| | | THE ABOVE OCTOBER TRANSACTIONS CAUSED US TO CROSS THE REPORTING THRESHHOLD. | | | | | | |
| SUBTOTAL (Carry with any additional subtotals to Line 1, Part IV) | | | | | | | \$ | 650.00 |

Attach additional information on appropriately labeled continuation sheets.

Use is required only for payments which are contributions or independent expenditures.

YOU MUST COMPLETE THE SUMMARY AND VERIFICATION ON PAGE 2

| | | | | |
|-------------------|---|---|---|---|
| OFFICIAL USE ONLY | C | D | E | F |
|-------------------|---|---|---|---|

Information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," Part X.

San Assembly District Democratic Committee

NOTE TO: (Amounts may be rounded off to whole dollars)

| FULL NAME & ADDRESS OF RECIPIENT (If committee, also enter I.D. Number or Treasurer's name and address) | NAME OF CANDIDATE AND OFFICE OR NAME OF BALLOT MEASURE AND BALLOT NUMBER OR LETTER | | INTEREST RATE | AMOUNT OF LOAN | CUMULATIVE AMOUNT |
|--|--|--------|---------------|----------------|-------------------|
| | Support | Oppose | | | |
| | | | | | |
| | | | | | |
| SUBTOTAL (Carry with additional subtotals to Line 3, Part IV) \$ | | | | | |

Attach additional information on appropriately labeled continuation sheets.

II LOANS REPAID BY: (Amounts may be rounded off to whole dollars)

| FULL NAME AND ADDRESS OF DEBTOR PLUS PERSON WHO REPAID THE LOAN IF DIFFERENT (If the loan was made to a committee, list the committee's name, address and I.D. Number. If the committee I.D. Number is unknown list the treasurer's full name and street address.) | AMOUNT REPAID THIS PERIOD | UNPAID BALANCE |
|---|---------------------------|----------------|
| | | |
| | | |
| SUBTOTAL (Carry with additional subtotals to Line 5, Part IV) \$ | | |

Attach additional information on appropriately labeled continuation sheets.

III SUMMARY

EXPENDITURES

| | |
|--|------------|
| Expenditures of \$100 or more this period (Part I) | \$ 650.00 |
| Expenditures under \$100 (Not itemized) | 68.63 |
| Loans made this period (Part II) | 0.00 |
| Subtotal (Line 1 + 2 + 3) | \$ 718.63 |
| Loans repaid this period (Part III) | 0.00 |
| Net expenditures this period (Line 4 - 5 may be negative amount) | \$ 718.63 |
| Cumulative expenditures from prior statement | 321.39 |
| Cumulative expenditures to date (Line 6 + 7) | \$ 1040.02 |

RECEIPTS

| | |
|--|-----------|
| 9. Monetary contributions received this period . . . \$ | 190.00 |
| 10. Non-monetary contributions received this period | 0.00 |
| 11. Cumulative total from previous period | 300.00 |
| 12. Cumulative contributions received to date (Line 9 + 10 + 11) | \$ 490.00 |
| CASH FLOW STATEMENT | |
| 13. Cash on hand at beginning of period | \$ 730.98 |
| 14. Cash receipts this period (Line 5 + 9) | 190.00 |
| 15. Miscellaneous adjustments to cash | 0.00 |
| 16. Cash expenditures this period (Line 4) | 718.63 |
| 17. Cash on hand at end of period (Line 13 + 14 + 15 - 16) | \$ 202.35 |

VERIFICATION

This committee has not received any contributions, cumulative contributions, or loans from a single source totaling \$100 or more. I declare under penalty of perjury that this campaign statement is true, correct and complete to the best of my knowledge and that I have used all reasonable diligence in its preparation.

Executed on 10-23-84 at Belmont, CA by Douglas DeYoung
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

Executed on _____ at _____ by _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE OR OFFICER/HOLDER)