

I-86-186



SUPERVISOR, FIRST DISTRICT
ROGER R. STANTON
CHAIRMAN OF THE BOARD OF SUPERVISORS

F P P U
JUN 2 8 45 AM '86

STANTON FOR SUPERVISOR COMMITTEE
P.O. BOX 8396, FOUNTAIN VALLEY, CA 92728-8396
PHONE (714) 839-3504

May 29, 1986

Carla Wardlow
Fair Political Practices Commission
P. O. Box 807
Sacramento, CA 95804

Dear Ms. Wardlow:

During our telephone conversation last week I indicated that Mr. Maurice Evans of the Orange County District Attorney's Office informed me that I was permitted to use my campaign funds to mail a "ballot guide" listing candidates that I personally recommend. At my request he gave me your name and number to discuss my reporting requirements.

Obviously, I must report the expenditure on my next statement. However, you indicated that if this was an "independent expenditure", i.e., none of the listed candidates requested or otherwise directed the preparation of the mailed flyer, then the listed candidates had no obligation to report the expenditure on their behalf. You also advised me that I had to identify the flyer as paid for by my Committee in at least six point type.

For the record I hereby state that none of the candidates listed on my ballot recommendation guide requested that I mail a flyer or otherwise make an expenditure on their behalf. Furthermore, none of the candidates had any part in the design, preparation, or mailing of the flyer. My Committee name and address appears on both sides of the mailer. The firm that handled the design and printing for me informed me that 47,862 copies of the flyer were mailed this afternoon (Thursday) for delivery tomorrow. As of this time the printing invoice and postage have been paid and no one other than the firm that prepared work and me have seen the flyer or know its content. A copy of the flyer is attached.

Thank you for taking the time to answer my questions last week.

Sincerely,


Roger R. Stanton

cc: Maurice Evans, DA's Office





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F P P C
JUN 3 10 32 AM '86

May 29, 1986

Mr. Al Olson, Registrar of Voters
County of Orange
1300 S. Grand Avenue
Santa Ana, CA 92705

Dear Mr. Olson:

Although I am not a candidate for elective office during this calendar year, I hereby inform you that I have made an independent expenditure using my Committee funds to print and mail a "Ballot guide" listing 15 candidates for selected state and local offices. This expenditure was not made at the behest of any of the 15 candidates that I recommended. None of the 15 candidates have seen the flyer upon which their name is listed or otherwise knows the content as of this date. There was no request, direction, cooperation, consultation, coordination, by or concert with any of the 15 candidates listed regarding my decision to produce and mail my recommendations or the design of the flyer itself.

I have attached a copy of the "ballot guide" flyer that will be deposited at the U. S. Post Office today. It has all of the required identification and "Notice to Voters" that the law specifies. I was informed by the Orange County District Attorney's Office (Mr. Evans) last week that I could make this independent expenditure if I so decided. I also consulted with the State FPPC (Ms. Wardlow) last week and was told that while I should report the expenditure on my next Report, the 15 candidates listed did not have to report an independent expenditure. If you believe otherwise please inform me immediately.

Please note that these facts are presented to you for information purposes only since I am not a candidate in the June 3rd Primary Election this year. Please also note that since this is an independent expenditure and the contents of the attached "ballot guide" flyer cannot be known to any of the 15 candidates listed until after it is delivered in the public mails either Friday or Saturday, therefore none of the candidates listed are responsible for any pre-disclosure of its contents.

If you have any questions, please contact me. Thank you.

Sincerely,


Roger R. Stanton

cc: Maurice Evans (OC DA's Office) and Carla Wardlow (FPPC)

