



California Fair Political Practices Commission

July 22, 1986

Deborah S. Merkel
Attorney at Law
25 Louisiana Ave., NW
Washington, DC 20001

Re: FPPC No. I-86-206

Dear Ms. Merkel:

This is in reply to your letter dated June 13, 1986, concerning the campaign disclosure provisions of the Political Reform Act.

QUESTION

You asked whether state law permits labor organizations to contribute to candidates for state and local offices and, if so, what are the reporting requirements.

ANSWER

The campaign disclosure provisions of California's Political Reform Act apply to contributions made to and expenditures made on behalf of state and local elected officeholders, candidates for state and local elected office and committees. The Political Reform Act does not prohibit or limit the amount of contributions which may be made by labor organizations or any other entities.

However, California cities and counties may adopt ordinances which prohibit or limit the amount of contributions the candidates being voted upon in the city or county may receive from certain types of entities. Therefore, you must request information from each city or county where you wish to contribute to a local candidate to determine whether there are prohibitions or contribution limitations effective in that jurisdiction.

With regard to the necessity of creating a special, segregated fund for the purpose of making contributions to California state and local candidates, since the state law does not contain campaign contribution prohibitions, it is not necessary to create a separate segregated fund.

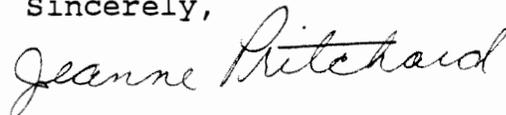
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With regard to the reporting requirements of the Political Reform Act, entities which qualify as committees under California's Political Reform Act must report their activity on the campaign disclosure forms prescribed by the Fair Political Practices Commission. Copies of FEC reports are not acceptable for reporting contributions to California state and local candidates or committees.

Enclosed for your information is a copy of the "Political Reform Act of 1974, as amended to January 1, 1986," the Fair Political Practices Commission's "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," which explains the registration and reporting requirements of committees, other informational materials, and the forms necessary for registration and reporting.

If you have any questions concerning the campaign disclosure provisions of the Political Reform Act, please call the Technical Assistance and Analysis Division at (916) 322-5662.

Sincerely,



Jeanne Pritchard
Division Chief, Technical
Assistance & Analysis Division

JP:kt
Enclosure

DEBORAH S. MERKEL

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June 13, 1986

Fair Political Practices Commission
Technical Assistance & Analysis Division
1100 K Street Mall, P.O. Box No. 807
Sacramento, CA 95804-0807

Dear Sir or Madam:

Please advise me as to whether state law permits labor organizations to contribute to candidates for state and local offices. If so, what are the reporting requirements?

I would also appreciate information as to the steps necessary for a labor organization to form a separate segregated fund ("SSF") which complies with state law. Please send any necessary forms. If a SSF contributes to both federal and state candidates, are copies of its FEC reports accepted in lieu of separate state reporting?

Thank you for your attention to this matter.

Very truly yours,

Deborah S. Merkel

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DSM:bah