



# California Fair Political Practices Commission

September 10, 1987

Mr. Bob Leach  
119 Ready Road  
Walnut Creek, CA 94598

Re: Your Request for Advice  
Our File No. A-87-219

Dear Mr. Leach:

You have requested advice concerning your spouse's disclosure responsibilities under the conflict of interests provisions of the Political Reform Act (the "Act").<sup>1/</sup>

#### QUESTION

Is your spouse required to disclose sources of income on a statement of economic interests which she must file in conjunction with her candidacy for a public office?

#### CONCLUSION

Candidates for public office are not required to disclose sources of income on their statements of economic interests.

#### FACTS

Your spouse is a candidate for a public office for which a Form 721, Statement of Economic Interests, must be filed. Your spouse has a business through which she derives income by receiving payments for speeches she gives to various organizations and business entities.

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<sup>1/</sup>Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Administrative Code Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Administrative Code.

ANALYSIS

Candidates for elective offices are required to file statements of economic interests no later than the final filing date for a declaration of candidacy. (Sections 87201, 87200.) Candidate statements must disclose investments and interests in real property held on the date the statement is filed. (Sections 87201, 87206.) Disclosure of sources of income is required only on annual statements and leaving office statements. (Sections 87203, 87204, 87202.) Therefore, your spouse does not have to disclose sources of income on a statement of economic interests filed in conjunction with her candidacy.

In your letter, you asked for an interpretation of whether income from speeches paid through a business which your spouse owns would be reportable on her Form 721, Schedule G. An answer to that question would require more facts than you provided in your letter. If your spouse is elected to office, I suggest you contact us for advice before she completes a statement of economic interests which includes income disclosure.

If you have any questions regarding the advice in this letter, please feel free to call me at (916) 322-5662.

Sincerely,

Diane M. Griffiths  
General Counsel



By: Bruce W. Robeck  
Political Reform Consultant

DMG:BWR:lm

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August 6, 1987  
119 Reader Rd  
Walnut Creek,  
Ca. 94598

Linda Mauraux  
Fair Political Practices Commission  
Box 807, Sacramento, Ca. 95804-0807

Subject: Form 721, Schedule G. - Honoraria

Dear Ms. Mauraux:

Confirming our conversation on the subject, you felt that payments for motivational, keynote and other speeches to organizations and businesses which were not dependent on the holding of office, or related to it, were not reportable. However, you wanted to double check your rules on this point.

Recall that I explained that my Wife, the candidate, has conducted a business for years which derives a significant part of its revenue from motivational and generally sales related speeches to corporate gatherings, social clubs, etc..

Would you kindly respond advising me of the rule in this matter?

Thank you,  
Bob French



# California Fair Political Practices Commission

August 11, 1987

Bob Leach  
119 Ready Road  
Walnut Creek, CA 94598

Re: 87-219

Dear Mr. Leach:

Your letter requesting advice under the Political Reform Act was received on August 10, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Adm. Code Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

A handwritten signature in cursive script that reads "Jeanne Pritchard".

Jeanne Pritchard  
Chief

Technical Assistance and Analysis  
Division

JP:jaj