



California Fair Political Practices Commission

March 1, 1989

Peter A. Bagatelos
Bagatelos & Fadem
601 California St., Ste. 1801
San Francisco, CA 94108

Re: Your Request for Informal
Assistance
Our File No. I-89-060

Dear Mr. Bagatelos:

You have requested confirmation of my telephone advice regarding entities which fail to file reports for entire years.

Your summary of my advice is correct to the extent that it applies to the discussion I recall. That is, a current recipient committee recently discovered that it should have begun filing reports as a recipient committee in 1986 but had not begun filing as a recipient committee until 1987. I advised you that the committee could file one report for all of 1986, rather than filing separate reports for the semi-annual and pre-election reporting periods.

Please note that this advice does not apply to the most recent previous year's campaign disclosure statements. For example, if a committee discovered in 1989 that it had failed to file reports for all of 1987 and all of 1988, it would be acceptable to file one report covering all of 1987, but separate semi-annual and pre-election reports would be required for 1988.

I hope this information is helpful. If you have additional questions, please call me at (916) 322-5662.

Sincerely,

Diane M. Griffiths
General Counsel

Carla Wardlow

By: Carla Wardlow
Political Reform Consultant

LAW OFFICES OF
BAGATELOS & FADEM

BARRY FADEM
PETER A. BAGATELOS
WES VAN WINKLE

THE INTERNATIONAL BUILDING
601 CALIFORNIA STREET
SUITE 1801
SAN FRANCISCO, CALIFORNIA 94108

TELEPHONE
(415) 982-7100
FAX
(415) 982-1085

January 24, 1989

Ms. Carla Wardlow
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, California 95814

Dear Carla:

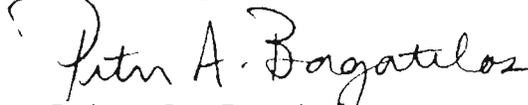
This will confirm our telephone conversation of January 23, 1989. I asked you if it has been the practice of your office to give advice that entities which fail to file campaign reports for one or more years, who subsequently determine that they had to file statements, could file a single report covering a whole calendar year instead of separate reports.

You advised me that it has been standard advice for as long as you can remember, while working in the technical assistance office of the Fair Political Practices Commission, that organizations finding themselves in such a situation could file one statement covering an entire year, with all disclosable information, instead of having to file separate reports that might otherwise have been required for separate segments of the calendar year.

I mentioned to you that Rich Eichmann told me that he had received this advice from you on several occasions in the past, and I wanted to confirm that this has been standard advice. As you recall, I used an example of a recipient committee for 1986 that determines in a subsequent year that it should have filed reports as a recipient committee. In this context, you confirmed that the advice of your office has been that it would be permissible for such an organization to file a single report for the entire year, disclosing all pertinent information.

Thank you very much for your assistance and advice.

Sincerely,


Peter A. Bagatelos

PAB/ki

cc: Rich Eichmann

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