



California Fair Political Practices Commission

May 2, 1989

Connie J. Sanders
1820 Idaho Avenue, No. 7
Santa Monica, CA 90403

Re: Letter No. 89-258

Dear Ms. Sanders:

You have requested confirmation of advice under the Political Reform Act. We have reviewed your request and determined that it is not appropriate for response with a simple confirmation. Therefore, we will be preparing a fuller analysis of the issues raised in your letter to us. After the analysis has been prepared and approved, we will forward it to you as quickly as we can.

If you have any questions, you may contact me at (916) 322-5662.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kevin Braaten-Moen".

Kevin Braaten-Moen
Political Reform Consultant

KB:plh:confadv2

Senate Rules Committee
State Capitol, Room 400
Sacramento CA 95814
Telephone: 916-445-4311
Telecopier: 916-445-1830

TELECOPIER COVER SHEET

DATE: 3-7-90

TO:

OFFICE: FPPC

CONTACT PERSON: Margaret Ellison

FROM: Cindy Lavagetto, Deputy Executive Officer

Attached is the draft transmittal cover letter for the
illustrated booklets proposed by Sen. Robbins.

Per instructions from Bob Leidigh, please respond to me
by FAX as soon as possible.

Thank you.

NUMBER OF PAGES TO FOLLOW: 1

IF YOU DO NOT RECEIVE ALL PAGES INDICATED ABOVE

PLEASE CALL: (916) 445-4311 AS SOON AS POSSIBLE.

19-658

Connie J. Sanders

1820 Idaho Avenue, No. 7
Santa Monica, CA 90403
213/453-6598

APR 21 10 43 AM '89

April 19, 1989

Mr. Kevin Moen
Fair Political Practices Commission
P.O. Box 807
Sacramento, California 95804-0814

Dear Mr. Moen:

This letter is a follow-up to our conversation this afternoon regarding individual contribution limits to candidate controlled committees and political committee.

As I understand our conversation, the following is true:

An individual may contribute up to \$1,000 per fiscal year per candidate. In addition, that same individual may currently contribute up to \$2,500 to a political committee. As the interpretation of Proposition 73 currently stands, that political committee may in turn contribute a maximum of \$2,500 per candidate controlled committee per fiscal year.

Example. A couple may each contribute up to \$1,000 to Friends of Leo McCarthy during the current fiscal year cycle ending June 30. They may also form a political committee and each contribute a maximum of \$2,500 to that political committee. That political committee may then make a maximum contribution of \$2,500 to Friends of Leo McCarthy during this current fiscal year.

I understand that it is your feeling that the specific language regarding this sort of situation may be changed in the coming months but that at the present time the example as cited is legal. And that should the language be changed in such a way to impact these limits, such a change would not be retroactive.

If I have misconstrued your advice please contact me at the address above.
Thank you.

Sincerely yours,



Connie J. Sanders

cc: Lance Olson
Bradley Blick

Connie J. Sanders

1820 Idaho Avenue, No. 7
Santa Monica, CA 90403
213/453-6598

APR 24 10 49 AM '89

April 19, 1989

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P.O. Box 807
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Sincerely yours,



Connie J. Sanders

cc: Lance Olson
Bradley Blick



March Fong Eu
Secretary of State

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

POLITICAL REFORM DIVISION
(916) 322-4880

June 23, 1988

Ms. Doris Stockton, Treasurer
AHLOA, ID# 881265
1900 Bonnie Brae Street
Riverside, CA 92506

Dear Ms. Stockton:

Thank you for your letter concerning Arlington Heights Landowner's Association and Riverside Tomorrow. I have reviewed your letter and the Statements of Organization of the two groups. The situation seems grey enough and the questions raised technical enough that I do not feel comfortable giving you advice. Therefore, I am referring your letter to the Fair Political Practices Commission, since they are responsible for making technical interpretations of the Political Reform Act of 1974.

Please accept my apology for not being able to handle this directly.

Sincerely,

A handwritten signature in cursive that reads "Wayne Imberi".

Wayne P. Imberi, Office Manager
Political Reform Division

WPI:mw

Enclosures

cc: FPPC

*Rec'd 6/24
cw*

June 20, 1988

Mr. Wayne Imberi
Political Reform Division
1230 J Street
P.O. Box 1467
Sacramento, CA 95807

88-258
due July 31



RE: Arlington Heights Landowner's Association - ID# 881-265

Dear Mr. Imberi,

In May, 1988 we were advised locally that "we needed to file form 410 because we seemed to be a sponsoring committee to a recipient committee."

Arlington Heights Landowners Association, (AHLOA), was incorporated in January, 1986 as a non-profit mutual benefit corporation. All of the funding of AHLOA has come from dues and assessments charged to our members. These funds were used to pay consultants for plans and suggestions for the use of the land owned by members of the association, legal fees, promotion and clerical help.

In the fall of 1987 we became politically active and formed Riverside Tomorrow - ID# 870-857. This PAC has done the required reporting for our political activity.

We are currently involved in qualifying an initiative for the Fall 1988 ballot.

It is not clear from our conversation today whether we need two PAC numbers and separate, duplicate reporting for the Board of Directors of ALHOA to contribute funds from the AHLOA treasury to Riverside Tomorrow PAC.

We are an inexperienced, grass roots group of local citizens who wish to follow the rules to the letter of the law.

Should we terminate PAC# 881-265 (AHLOA)? If so, how should we proceed?

We appreciate your help and are looking forward to your clarification.

Sincerely,

Doris Stockton

Doris Stockton, Treasurer, AHLOA
1900 Bonnie Brae Street
Riverside, CA 92506

Rec'd 6/29
CW



Form 410
1988

FILE AN ORIGINAL AND ONE COPY OF THIS FORM WITH

Secretary of State
Political Reform Division
P O Box 1467
Sacramento, CA 95812 1467

AND, IF APPLICABLE, FILE ONE COPY OF THIS FORM WITH

The city or county filing officer, if any, with whom the committee must file its original campaign disclosure statements

12-53
L

RECEIVED AND FILED
Office of the Secretary of State of the State of California

MAY 27 1988

MARCH FONG EU, Secretary of State

STATEMENT OF ORGANIZATION (RECIPIENT COMMITTEE)

(Government Code Section 84101.84103)

881265
IF AMENDMENT
ENTER I.G. NUMBER

(Type or Print in Ink)

FULL NAME OF COMMITTEE

Arlington Heights Homeowners Association

STREET ADDRESS OF COMMITTEE (NOT P.O. BOX) NO. AND STREET CITY STATE ZIP CODE COUNTY
2970 Market St Riverside CA 92501 Riverside

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET (OR P.O. BOX) CITY/STATE ZIP CODE
1400 Bonnie Brook St Riverside CA 92506

DATE QUALIFIED AS COMMITTEE (MO. DAY, YR.) AREA CODE PHONE NUMBER A OFFICIAL USE ONLY B OFFICIAL USE ONLY
(714) 369-5414

I TREASURER AND OTHER PRINCIPAL OFFICERS

POSITION	NAME AND ADDRESS AND MAILING ADDRESS, IF DIFFERENT	AREA CODE	BUSINESS PHONE NO
TREASURER	Tom Stockton 1400 Bonnie Brook St Riverside 92506	714	684-4956
President	Peter W. 6794 Bonaventure Riverside 92526	714	684-1104
Secretary	Joyce Westwood 11621 Zodiac Dr Riverside 92503	714	287-3649

Attach additional information on appropriately labeled continuation sheets

II IS THIS A CONTROLLED COMMITTEE?

(A controlled committee is one which is controlled directly or indirectly by a candidate or a proponent of a state ballot measure or which acts jointly with a candidate, controlled committee or proponent of a state ballot measure in connection with the making of expenditures. A candidate or proponent of a state ballot measure controls a committee if he or she, his or her agent, or any other committee he or she controls, has a significant influence on the actions or decisions of the committee.)

YES (Complete the following and proceed to Part III) NO

NAME OF CONTROLLING CANDIDATE, NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD AND DISTRICT NUMBER, IF ANY. IF THIS COMMITTEE IS CONTROLLED BY MORE THAN ONE CANDIDATE, THE NAME OF EACH CONTROLLING CANDIDATE MUST BE LISTED. IF THIS COMMITTEE IS CONTROLLED BY A STATE MEASURE PROPONENT, NAME OF THE STATE MEASURE PROPONENT MUST BE LISTED

Attach additional information on appropriately labeled continuation sheets

III IS THIS COMMITTEE ACTING JOINTLY WITH OTHER COMMITTEES?

YES (Complete the following and proceed to Part V) NO

NAMES OF COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY ALSO PROVIDE THE COMMITTEE'S IDENTIFICATION NUMBERS OR THE TREASURERS' NAMES AND PERMANENT STREET ADDRESSES

Attach additional information on appropriately labeled continuation sheets

YOU MUST COMPLETE THE VERIFICATION ON PAGE 2

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."

5 THIS A SPONSORED COMMITTEE? (Refer to the instructions on the reverse side for definitions and rules regarding the name of a sponsored committee.)

NO

YES (Provide name and address of sponsor. If the committee has more than one sponsor, provide the name and address of each sponsor on an attachment. Also check one of the classifications below.)

Name of Sponsor: Abington Heights Landowner's Association

Address of Sponsor: 2470 Marriot St Richmond CA 92501

CLASSIFICATION OF SPONSORED COMMITTEE BY INDUSTRY GROUP OR AFFILIATION (Check one box):

- Agriculture Education Entertainment/Recreation Finance/Insurance Health
- Industrial/Manufacturing Labor Legal Merchandise/Retail Oil/Gas Public Employees
- Real Estate Trade Transportation Utilities
- Other: _____

V IF PRIMARILY FORMED TO SUPPORT OR OPPOSE SPECIFIC CANDIDATES OR MEASURES, LIST SPECIFIC CANDIDATES OR MEASURES SUPPORTED OR OPPOSED.

CANDIDATE'S NAME/MEASURE'S FULL TITLE INCLUDING BALLOT NUMBER OR LETTER	SUPPORT	OPPOSE	OFFICE SOUGHT OR HELD BY CANDIDATE OR MEASURE'S JURISDICTION (Include district number, city or county as applicable)
<u>N/A</u>			

Attach additional information on appropriately labeled continuation sheets.

VI COMMITTEE'S PRINCIPAL ACTIVITY IF NOT SUPPORTING OR OPPOSING SPECIFIC CANDIDATES OR MEASURES -- PLEASE CHECK BOX TO INDICATE THE COMMITTEE'S LEVEL OF ACTIVITY: CITY COUNTY STATE

Community group who supports candidates and growth management issues.

Attach additional information on appropriately labeled continuation sheets.

VII YOU MUST SPECIFY WHAT DISPOSITION WILL BE MADE OF SURPLUS FUNDS IN THE EVENT OF TERMINATION.

Surplus funds to revert to Abington Heights Landowner's Association
General Fund

VERIFICATION

I have used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____ by Dennis Stork
(Date) (City and State) (Signature of Treasurer)

Executed on _____ at _____ by N/A
(Date) (City and State) (Signature of Controlling Candidate, Officeholder or State Measure Proponent)



FILE AN ORIGINAL AND ONE COPY OF THIS FORM WITH:
 Secretary of State
 Political Reform Division
 P.O. Box 1467
 Sacramento, CA 95807

AND, IF APPLICABLE, FILE ONE COPY OF THIS FORM WITH:
 The city or county filing officer, if any, with whom the committee must file its original campaign disclosure statements.

R-33

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

FEB 01 1988

MARSH FONG EU, Secretary of State

Form 410 1987 **STATEMENT OF ORGANIZATION (RECIPIENT COMMITTEE)**
 (Government Code Section 84101-84103)

IF AMENDMENT
 ENTER I.D. NUMBER (Type or Print in Ink)

FULL NAME OF COMMITTEE: Riverside Tomorrow & Arlington Heights Citizen's Association
 STREET ADDRESS OF COMMITTEE: 6807 Airport Drive Suite 123 Riverside CA 92504
 DATE QUALIFIED AS COMMITTEE (MO., DAY, YR.): OCT-8-1987 AREA CODE: 714 PHONE NUMBER: 688-2492

I TREASURER AND OTHER PRINCIPAL OFFICERS

POSITION	NAME AND PERMANENT STREET ADDRESS	(AREA CODE)	BUSINESS PHONE NO.
TREASURER	Betty C. Doubravsky 2523 Adams St. Riverside CA 92504	714	688-2492

Attach additional information on appropriately labeled continuation sheets.

II IS THIS A CONTROLLED COMMITTEE OR DOES THIS COMMITTEE ACT JOINTLY WITH ANOTHER CANDIDATE OR COMMITTEE?
 (A controlled committee is one which is controlled directly or indirectly by a candidate or a proponent of a state ballot measure or which acts jointly with a candidate, controlled committee or proponent of a state ballot measure in connection with the making of expenditures. A candidate or proponent of a state ballot measure controls a committee if he or she, his or her agent, or any other committee he or she controls, has a significant influence on the actions or decisions of the committee.)
 YES (Complete the following and proceed to Part IV) NO

CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE; CANDIDATES, STATE MEASURE PROPONENTS OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY.
 NOTE: If this committee is controlled by more than one candidate, the name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR AFFILIATED COMMITTEE. IF CANDIDATE, ALSO PROVIDE THE NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD, AND DISTRICT NUMBER, IF ANY.	IF ACTING JOINTLY WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS

Attach additional information on appropriately labeled continuation sheets.

III IS THIS A SPONSORED COMMITTEE? (Refer to definitions on the reverse side)
 YES (Provide name and address of sponsor. If the committee has more than one sponsor, provide the name and address of each sponsor on an attachment.)
 Name of Sponsor: Arlington Height Citizen's Assoc. (AKA) AHCA
 Address of Sponsor: 10621 Zodiac Drive - Riverside CA. 92503
 (If yes, check one of the classifications below and refer to the instructions on the reverse side for definitions and rules regarding the name of the committee.)

CLASSIFICATION OF COMMITTEE BY INDUSTRY GROUP OR AFFILIATION:

Agriculture Education Entertainment/Recreation Finance/Insurance Health
 Industrial/Manufacturing Labor Legal Merchandise/Retail Oil/Gas Public Employees
 Real Estate Trade Transportation Utilities
 Other: General Purpose Recipient Committees

Attach additional information on appropriately labeled continuation sheets.

YOU MUST COMPLETE THE VERIFICATION ON PAGE 2

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."

7 SPECIFIC CANDIDATE

AND ONE AND, IF APPLICABLE, FILE ONE OF THIS FORM WITH:

R-33
L

RECEIVED AND FILED in the office of the Secretary of State of the State of California OCT 19 1987

Riverside Tomorrow

Joyce Westwood, Chairwoman
(714) 987-0125
6207 Airport Dr., Suite 173
Riverside, CA 92504-1903

Betty Doubravsky
Treasurer

PAC - Arlington Heights Citizens Association

1-26-88

This report was filled out as ask for in December 1987. I thought it had been mailed out. In going through my personal tax papers I found this ready to be mailed etc. I'm terribly sorry

Sincerely
Betty Doubravsky
Treasurer.

MARCH FONG EU, Secretary of State

COUNTY: Riverside

AREA CODE	BUSINESS PHONE NO.
714	688-2492
504	

JOINTLY WITH ANOTHER

ponent of a state ballot measure or in connection with the making of he, his or her agent, or any other (e.)

COMMITTEE; CANDIDATES, COMMITTEE ACTS JOINTLY. If candidate must be listed below.

OFFICE IDENTIFICATION NUMBER OF PERMANENT STREET ADDRESS

Sponsor, provide the name
Assoc. 1
92503

for definitions and rules regarding

- Health
- Gas
- Public Employees

Joint Committees

Attach additional information on appropriately labeled continuation sheets.

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AND ONE
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Secretary of State
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P.O. Box 1467
Sacramento, CA 95807

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The city or county filing officer, if any,
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statements.

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

OCT 19 1987

MARCH FONG EU, Secretary of State

Form 410
1987

STATEMENT OF ORGANIZATION (RECIPIENT COMMITTEE)

(Government Code Section 84101-84103)

870857

IF AMENDMENT
ENTER I.D. NUMBER

(Type or Print in Ink)

FULL NAME OF COMMITTEE:

Riverside City and County of Tomorrow

STREET ADDRESS OF COMMITTEE:

6807 Airport Drive Suite 123 - Riverside CA 92504-1903 Riverside

DATE QUALIFIED AS COMMITTEE (MO., DAY, YR.):

Oct. 8 - 1987

AREA CODE

714-

PHONE NUMBER

688-2492

A OFFICIAL USE ONLY

B OFFICIAL USE ONLY

I TREASURER AND OTHER PRINCIPAL OFFICERS

POSITION	NAME AND PERMANENT STREET ADDRESS	(AREA CODE)	BUSINESS PHONE NO.
TREASURER	Betty C. Doubnauskay 2523 Adams St., Riverside CA 92504	714-	688-2492

Attach additional information on appropriately labeled continuation sheets.

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[X] YES (Provide name and address of sponsor. If the committee has more than one sponsor, provide the name and address of each sponsor on an attachment.)

Name of Sponsor: AALOA [Arifington Heights Landowners Assoc.]

Address of Sponsor: 10621 Zodiac Drive, Riverside CA - 92503

(If yes, check one of the classifications below and refer to the instructions on the reverse side for definitions and rules regarding the name of the committee.)

CLASSIFICATION OF COMMITTEE BY INDUSTRY GROUP OR AFFILIATION:

- Agriculture Education Entertainment/Recreation Finance/Insurance Health
- Industrial/Manufacturing Labor Legal Merchandise/Retail Oil/Gas Public Employees
- Real Estate Trade Transportation Utilities

X Other: General Purpose Recipient Committees

Attach additional information on appropriately labeled continuation sheets.

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ORIGINAL AND ONE
OF THIS FORM WITH:

Secretary of State
Political Reform Division
P.O. Box 1467
Sacramento, CA 95807

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233
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RECEIVED
AND FILED
in the office of the Secretary of State
of the State of California

AUG 24 1987

EA

MARCH FONG EU, Secretary of State

410
1987

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(Government Code Section 84101-84103)

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(Type or Print in Ink)

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RIVERSIDE TOMORROW

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6807 Airport Drive, Suite 123 Riverside CA 92503 Riverside

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not yet qualified 714 688-2492

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Name of Sponsor: AHLQA

Address of Sponsor: 10621 Zodiac Drive Riverside CA 92503

(If yes, check one of the classifications below and refer to the instructions on the reverse side for definitions and rules regarding the name of the committee.)

CLASSIFICATION OF COMMITTEE BY INDUSTRY GROUP OR AFFILIATION:

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