



California Fair Political Practices Commission

July 5, 1989

Lance H. Olson, Esq.
Olson, Connelly, Hagel & Fong
300 Capitol Mall, Suite 350
Sacramento, CA 95814

Re: Your Request for Confirmation
of Telephone Advice
Our File No. A-89-271

Dear Mr. Olson:

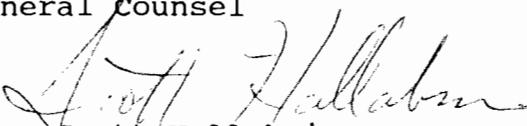
This is to confirm as accurate your summary of the telephone advice we provided to you on April 25, 1989 concerning the contribution limits under the Political Reform Act (the "Act")^{1/}

Specifically, we informed you that, based upon Regulation 18500, (copy enclosed), contributions made to a candidate between July 1, 1988 and December 31, 1988 do not count toward the Act's contribution limits for the fiscal year ending June 30, 1989.

Should you have any questions, please contact me at (916) 322-5901.

Sincerely,

Kathryn E. Donovan
General Counsel


By: Scott Hallabrin
Counsel, Legal Division

KED:SH:ld

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

Law Offices of
OLSON, CONNELLY, HAGEL & FONG

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May 4, 1989

Mr. Scott Hallabrin
Counsel, Legal Division
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, California 95814

**RE: Request for Written Confirmation of Telephone
Advice**

Dear Mr. Hallabrin:

The purpose of this letter is to confirm advice given to me by you in our telephone conversation of Tuesday, April 25, 1989.

As you will recall I telephoned to follow-up on advice given by you in your letter of March 21, 1989 (Advice Letter No. A-89-100). As you recall following the Los Angeles Superior Court's ruling we had submitted a series of questions on behalf of certain specified clients of this law firm. In our telephone conversation of April 25th I sought follow-up advice on behalf of those same clients and those similarly situated concerning the following questions:

LANCE H. OLSON
BRUCE J. HAGEL
LEROY Y. FONG
ROBERT E. LEIDIGH

Assume that a candidate, pursuant to Commission regulations in effect until February 8, 1989, placed contributions received prior to January 1, 1989 in a campaign bank account and intended to use the contributions to support the candidate's election to future office. Also assume that those contributions were then commingled in the campaign bank account with contributions received on or after January 1, 1989.

OF COUNSEL
LLOYD G. CONNELLY, Member
California State Legislature

Assume further that funds from the commingled campaign account were expended in excess of the amounts received between January 1, 1989 and February 8, 1989. Are contributions made to the candidate between July 1, 1988 and December 31, 1988 counted towards the contribution limits applicable to the fiscal year ending June 30, 1989 for contributions received by the candidate after February 8, 1989.

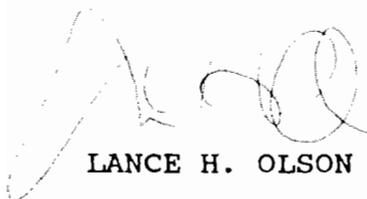
May 4, 1989
Page Two

Based on the above situation you advised me that contributions made to a candidate between July 1, 1988 and December 31, 1988 are not counted towards the contribution limits applicable to the fiscal year ending June 30, 1989 for contributions made after February 8, 1989. This advice was based upon emergency regulation 18500 adopted by the Commission at its April 4, 1989 meeting.

If I have misstated your advice in any way please notify me immediately. Otherwise you may provide a written response in the normal course.

Very truly yours,

OLSON, CONNELLY, HAGEL & FONG

A handwritten signature in dark ink, appearing to read "Lance H. Olson", written over a light-colored background.

LANCE H. OLSON

LHO:kh

Law Offices of
OLSON, CONNELLY, HAGEL & FONG

MAY 8 08 AM '89

May 4, 1989

Mr. Scott Hallabrin
Counsel, Legal Division
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, California 95814

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OF COUNSEL
LLOYD G. CONNELLY, *Member*
California State Legislature

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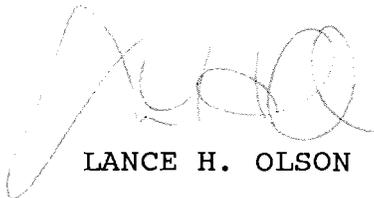
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Very truly yours,

OLSON, CONNELLY, HAGEL & FONG

A handwritten signature in dark ink, appearing to read "Lance H. Olson", is written over the typed name.

LANCE H. OLSON

LHO:kh



California Fair Political Practices Commission

May 9, 1989

Lance Olson
Olson, Connelly, Hagel & Fong
300 Capitol Mall, Suite 350
Sacramento, CA 95814

Re: Letter No. 89-271

Dear Mr. Olson:

We received your letter requesting confirmation of advice under the Political Reform Act on May 8, 1989. Your letter has been assigned to Scott Hallabrin for response. If you have any questions, you may contact him directly at (916) 322-5901.

If the letter is appropriate for confirmation without further analysis, we will attempt to expedite our response. A confirming response will be released after it has gone through our approval process. If the letter is not appropriate for this treatment, the staff person assigned to prepare the response will contact you shortly to advise you. In such cases, the normal analysis, review and approval process will be followed.

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

Sincerely,

A handwritten signature in cursive script that reads "Kathryn E. Donovan".

Kathryn E. Donovan
General Counsel

KED:plh:confadv1