



# California Fair Political Practices Commission

June 28, 1989

Nancy V. Dooley  
Dooley & Leibovitz  
1255 Post Street, Suite 437  
San Francisco, CA 94109

Re: Your Request for Advice  
Our File No. A-89-352

Dear Ms. Dooley:

You have requested advice on behalf of the San Francisco Official Court Reporters Association Political Fund (SFOCRA) regarding campaign disclosure obligations under the Political Reform Act (the "Act").<sup>1/</sup>

#### QUESTION

Is the SFOCRA required to file reports as a "county general purpose recipient committee" or as a "state general purpose recipient committee"?

#### CONCLUSION

The SFOCRA is a "county general purpose recipient committee" for purposes of when and where to file its campaign disclosure reports.

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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 Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

### FACTS

The SFOCRA has filed campaign statements as a state general purpose recipient committee since it filed its first campaign statement for the period 1/1/76 through 1/6/77. The SFOCRA makes direct contributions or expenditures to support or oppose only local candidates or measures being voted upon in the city and county of San Francisco. In addition, the committee also makes monetary contributions to the Political Action California Court Reporters Association, a state general recipient purpose committee. From the inception of SFOCRA in 1976, it has made five separate contributions totaling \$3,780, to the state committee. During the same period, contributions to support local candidates or measures totaled \$12,680.

### ANALYSIS

Section 82027.5(c) defines a "county general purpose recipient committee" as a "committee to support or oppose candidates or measures voted on in only one county, or in more than one jurisdiction within one county."

With regard to where campaign statements are filed, Section 84215(d) states in part that "...county general purpose recipient committees shall file the original and one copy with the clerk of the county..."

Section 82027.5(b) defines a "state general purpose recipient committee" as a "committee to support or oppose candidates or measures voted on in a state election, or in more than one county."

However, a committee active primarily within a single city or a single county, which makes occasional contributions to state candidates and state general purpose recipient committees or state measures, would not meet the definition of a state general purpose recipient committee. (Whitaker Advice Letter, No. A-87-115, copy enclosed.) If the committee begins to regularly make contributions to candidates for state office or to state general purpose recipient committees, or becomes involved to any significant degree in state elections, it should begin filing as a state general purpose recipient committee.

Nancy V. Dooley  
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It appears the SFOCRA should have indicated on the statement of organization (Form 410) that it was a county general purpose recipient committee, and thereafter, filed its campaign statements with the San Francisco Registrar of Voters. The committee should amend its original statement of organization to reflect its status as a county committee rather than a state committee.

If you have any questions regarding this letter, please contact me at (916) 322-5662.

Sincerely,

Kathryn E. Donovan  
General Counsel



By: Sandra Taylor  
Political Reform Consultant

cc: Secretary of State

FPPC

NANCY J. DOOLEY  
PAULA C. LEIBOVITZ

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LAW OFFICES  
DOOLEY & LEIBOVITZ  
1255 POST STREET, SUITE 437  
SAN FRANCISCO, CALIFORNIA 94109

TELEPHONE: (415) 885-4005

BERKELEY OFFICE  
2000 CENTER STREET  
P. O. BOX 1029  
BERKELEY, CALIFORNIA 94701  
TELEPHONE: (415) 845-2823

REPLY TO:  
SAN FRANCISCO

June 5, 1989

Sandra Taylor, Campaign Consultant  
Fair Political Practices Commission  
428 J Street, 7th Floor  
Sacramento, CA 95814

Re: San Francisco Official Court Reporters  
Association Political Fund, I.D. #770681

Dear Ms. Taylor:

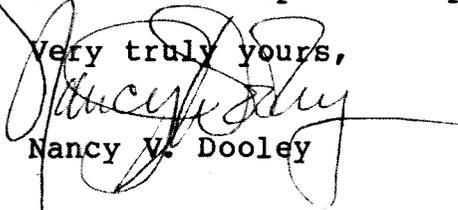
The SFOCRA Political Fund is seeking a determination from the Fair Political Practices Commission that it is properly a local General Purpose Recipient Committee instead of a State General Purpose Recipient Committee.

The San Francisco Official Court Reporters Association Political Fund (hereafter "SFOCRA Political Fund") has filed Campaign Statements as a State General Purpose Recipient Committee since it filed its first Committee Campaign Statement for the period 1-7-76 through 1-6-77.

As I told you when we spoke yesterday, the SFOCRA Political Fund makes direct contributions or expenditures to support or oppose only local candidates or measures being voted upon in the City and County of San Francisco. In addition to local contributions or expenditures the SFOCRA Political Fund also makes monetary contributions to the Political Action California Court Reporters Association, a State General Purpose Recipient Committee. From the inception of the SFOCRA Political Fund in 1976 five separate contributions have been made to the State PAC totaling \$3,780. During the same period contributions to support local candidates or measures totaled \$12,680.

We look forward to your determination that the SFOCRA Political Fund is a local General Purpose Recipient Committee.

Very truly yours,

  
Nancy V. Dooley

NJD:mc

cc: Harvey Tsuboi - Office of Secretary of State  
Carl Saucedo - Treasurer, SFOCRA Political Fund

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DOOLEY & LEIBOVITZ

1255 POST STREET, SUITE 437  
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BERKELEY OFFICE  
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P. O. BOX 1029  
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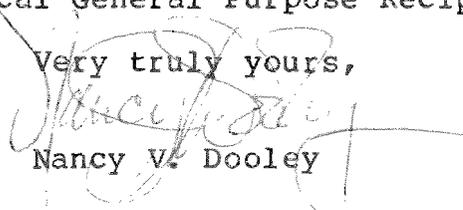
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Very truly yours,



Nancy V. Dooley

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cc: Harvey Tsuboi - Office of Secretary of State  
Carl Saucedo - Treasurer, SFOCRA Political Fund



# California Fair Political Practices Commission

June 8, 1989

Nancy V. Dooley  
Dooley & Leibovitz  
1255 Post Street, Suite 437  
San Francisco, CA 94109

Re: Letter No. 89-352

Dear Ms. Dooley:

Your letter requesting advice under the Political Reform Act was received on June 7, 1989 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. Code of Regs. 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 by plh".

Jeanne Pritchard  
Chief Technical Assistance  
and Analysis Division

JP:plh