



California Fair Political Practices Commission

July 14, 1989

Bruce W. Robeck
Paralegal/Administrator
Political Reports Unit
Nielsen, Mersksamer, Hodgson,
Parrinello & Mueller
770 L Street, Suite 800
Sacramento, CA 95814

Re: Your Request for Advice
Our File No. A-89-359

Dear Mr. Robeck:

This is to confirm the telephone advice given to you concerning the Political Reform Act^{1/} by Jeanne Pritchard of this office on June 7, 1989.

Specifically, Ms. Pritchard informed you that contributions by a husband and wife do not have to be cumulated for purposes of disclosure on a campaign statement. This advice is based on the assumption that the recipient of the contributions was informed in writing at the time the contributions were received that a portion of the contributions were from the husband and a portion from the wife. For example, separate checks were received, one signed by the husband and one signed by the wife. Alternatively, this information could be provided with one check signed by either husband or wife, accompanied by a letter signed by both indicating the apportionment of contributions between them.

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.

LAW OFFICES OF
**NIELSEN, MERKSAMER,
HODGSON, PARRINELLO & MUELLER**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

770 L STREET, SUITE 800

SACRAMENTO, CALIFORNIA 95814

TELEPHONE (916) 446 6752

SAN FRANCISCO

650 CALIFORNIA STREET, SUITE 2650
SAN FRANCISCO, CALIFORNIA 94108
TELEPHONE (415) 989 6800

FILE NUMBER

June 14, 1989

Jeanne Pritchard
Chief, Technical Assistance
and Analysis Division
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, CA 95804

Dear Jeanne:

This letter is to confirm in writing my understanding of the telephone advice you provided to me on Wednesday, June 7, 1989.

QUESTION

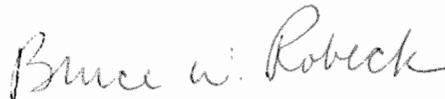
Are contributions by a husband and a wife made from community property funds but with independent decision making by each spouse cumulated for purposes of disclosure on the recipients campaign statement?

SUMMARY OF ADVICE

Contributions by a husband and a wife are not cumulated for purposes of disclosure on a campaign statement.

If the above information conforms to your understanding of the question and the answer, please confirm.

Sincerely,



BRUCE W. ROBECK
Paralegal/Administrator
Political Reports Unit

BWR/rh

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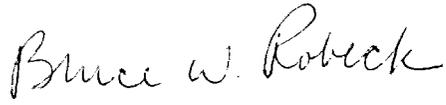
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BRUCE W. ROBECK
Paralegal/Administrator
Political Reports Unit

BWR/rh



California Fair Political Practices Commission

June 19, 1989

Bruce W. Robeck
Paralegal/Administrator
Political Reports Unit
Nielsen, Merksamer, Hodgson,
Parrinello & Mueller
770 L Street, Suite 800
Sacramento, CA 95814

Re: Letter No. 89-359

Dear Mr. Robeck:

We received your letter requesting confirmation of advice under the Political Reform Act on June 15, 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, appearing to read "Kathryn E. Donovan".

Kathryn E. Donovan
General Counsel

KED:plh:confadv1

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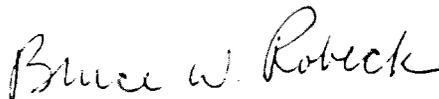
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