



# California Fair Political Practices Commission

September 19, 1989

Ronald Turovsky  
Manatt, Phelps, Rothenberg & Phillips  
11355 West Olympic Boulevard  
Los Angeles, CA 90064

Re: Your Request For Informal Assistance  
Our File No. I-89-475

Dear Mr. Turovsky:

You have requested written confirmation of informal assistance provided to you concerning the campaign provisions of the Political Reform Act. (Government Code Sections 81000-91015.) Because you have not identified the person on whose behalf you are seeking assistance, we treat your letter as a request for informal assistance, rather than formal advice.1/

Your letter correctly states my advice concerning identification of the sender of a mass mailing and, for contribution solicitations, the requirement to identify by name the controlled committee, the specific office and particular election for which contributions are being solicited.

Enclosed for your information is a copy of Regulation 18523.1, entitled "Written Solicitation For Contributions."

If you have any questions about this letter, please contact me.

Sincerely,

Kathryn E. Donovan  
General Counsel

A handwritten signature in cursive script that reads "Jeanne Pritchard".

By: Jeanne Pritchard  
Division Chief  
Technical Assistance and  
Analysis Division

enclosures

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1/ Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice.  
(Section 83114; Regulation 18329(c)(3).)

AUG 15 1989

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August 10, 1989

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\*MEMBER OF DISTRICT OF COLUMBIA AND CALIFORNIA BARS
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OUR FILE NO.

Jeanne Pritchard
Division Chief
Technical Assistance and Analysis Division
California Fair Political Practices Commission
428 J Street, Suite 800
P.O. Box 807
Sacramento, California 95804-0807

Re: August 10, 1989, Conversation Concerning
Officeholder Expense Committee

Dear Ms. Pritchard:

This is to confirm our telephone conversations on August 10, 1989, in which we discussed certain questions that I posed concerning solicitation of contributions by an officeholder expense committee. Specifically, I first asked you whether the outside envelope sent to prospective contributors must identify that the envelope is from the specific officeholder expense committee, or whether the envelope could instead refer to the officeholder. Second, I asked you whether the return card that would be included in the solicitation materials must specify the intent of the committee; in other words, I asked whether the return card must state that the funds will be used to pay for expenses incurred holding office. Finally, I asked you whether the return envelope provided in the solicitation materials may be addressed to the specific officeholder as opposed to the officeholder expense committee.

Concerning the first question, you responded that you thought it was proper to identify either the officeholder or the committee, but that you wanted to check certain materials to be

Jeanne Pritchard  
August 10, 1989  
Page 2

sure. You indicated you would call me back with a definitive answer.

In responding to this question, you explained the overall requirements for a solicitation of this kind. You stated that the solicitation itself -- the letter included in the materials -- must specify which office and which specific election year are involved. Also, the solicitation must instruct contributors to make their checks payable to the specific officeholder expense committee.

Answering the second question, you stated that the return card did not need to recite the intentions of the committee or state that the funds will be used to pay for expenses incurred holding office. As noted, the only requirements involve the solicitation letter; no specific references are required in the return card.

Likewise, your answer to the third question was that the return envelope can be addressed to the officeholder. Again, you noted that the only requirements involve the solicitation letter; no specific references are required in the return envelope.

Later that day, you called me back and stated that, after reviewing your materials, you confirmed that the outer envelope sent to prospective contributors may identify the sender as either the officeholder or the officeholder expense committee.

Thank you for your assistance. If the information that I have described above is in any way inaccurate, please let me know immediately.

Very truly yours,



Ronald B. Turovsky  
Manatt, Phelps,  
Rothenberg & Phillips



# California Fair Political Practices Commission

August 21, 1989

Ronald S. Turvosky  
Manatt, Phelps, Rothenberg & Phillips  
11355 West Olympic Boulevard  
Los Angeles, CA 90064

Re: Letter No. 89-475

Dear Mr. Turvosky:

We received your letter requesting confirmation of advice under the Political Reform Act on August 15, 1989. Your letter has been assigned to our Technical Assistance and Analysis Division for response. If you have any questions, you may contact that division directly at (916) 322-5662.

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,

Kathryn E. Donovan  
General Counsel

KED:plh:confadv1

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