



California Fair Political Practices Commission

October 31, 1989

Andrew Sargent, Campaign Manager
Committee to Elect Kay Bara
1 Peppertree Drive
Rancho Palos Verdes, CA 90274

Re: Your Request for Advice
Our File No. A-89-~~567~~

Dear Mr. Sargent:

You have requested confirmation of telephone advice provided to you concerning the campaign provisions of the Political Reform Act.^{1/}

Your letter, dated September 28, 1989, correctly summarizes my advice. Loans are subject to the same limitations as other monetary and non-monetary contributions and you may not make loans or contributions aggregating more than \$1,000 per fiscal year to a candidate. Although you have also correctly summarized my advice that the loan you made to Ms. Bara should be shown coming in on Schedule B of Form 490 and returned on Schedule E, we have reconsidered that advice. The committee should disclose receipt of the loan on Part 1 of Schedule B and reflect the return on Part 2 of Schedule B. This is necessary to properly reflect the committee's outstanding loan balance on the summary page.

Expenses which were paid directly by the candidate should be disclosed as monetary contributions on Schedule A and as expenditures on Schedule E. Expenditures of \$100 or more must be itemized, but expenditures under \$100 can be lumped together on Line 2 of the Summary at the bottom of Schedule E.

Please contact me at (916) 322-5662 if you have any additional questions.

Sincerely,

Kathryn E. Donovan
General Counsel


By: Wayne P. Imberi
Political Reform Consultant

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.



California Fair Political Practices Commission

October 2, 1989

Andrew Sargent
Campaign Manager
Committee to Elect Kay Bara
1 Peppertree Drive
Rancho Palos Verdes, CA 90274

Re: Letter No. 89-567

Dear Mr. Sargent:

We received your letter requesting confirmation of advice under the Political Reform Act on October 2, 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,

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

Kathryn E. Donovan
General Counsel

KED:plh:confadv1

ELECT KAY BARA



RPV CITY COUNCIL

COMMITTEE TO ELECT KAY BARA

1 Peppertree Drive
Rancho Palos Verdes, CA 90274
(213) 541-1914



September 28, 1989

California Fair Political Practices Committee
428 J. Street
Sacramento, CA 95814
Attn. Wayne Imberi

Dear Mr. Imberi:

This letter confirms our discussion today concerning how to handle the errors I made when we were starting the campaign organization. As we discussed, I did not realize a loan was counted toward the \$1,000 contribution limit. I made a second loan of \$1,000 to the Committee which is in technical violation. In addition, the candidate paid for several expenditures personally.

Please be assured we now understand the new complex regulations and will insure all future actions are in full compliance. I apologize for the errors and they were my mistakes. I take full responsibility for the violations. Per your instructions I have taken the following actions.

Loan to Committee in Excess of \$1,000.00

The Receipt of the loans are shown on Schedule B. The return of the excess loan is listed on Schedule E.

Expenses paid for directly by the Candidate.

We have included the amount expended on Schedule A as a direct cash contribution by the candidate. We have included the amounts expended on Schedule E as expenditures.

I wish to thank you for your assistance. Please feel free to contact me if you have any questions or further guidance.

Sincerely yours,

Andrew Sargent
Campaign Manager

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