



California Fair Political Practices Commission

November 13, 1989

Carol Ann Butler
Deputy City Clerk
P.O. Box 3707
Sunnyvale, CA 94086-3707

Re: Your Request For Advice
Our File No. A-89-579

Dear Ms. Butler:

You have requested confirmation of telephone advice provided to you as a filing officer for the City of Sunnyvale concerning the campaign disclosure provisions of the Political Reform Act.^{1/}

Your letter, dated October 2, 1989, correctly summarizes the advice I provided to you regarding your duties as a filing officer under the Political Reform Act, except as indicated below. As we discussed on October 24, 1989, you should fully review all campaign disclosure statements which were filed during the years 1985-1988 by current elected city officeholders, their controlled committees, ballot measure committees and general purpose committees. Enclosed is a copy of the Handbook for City and County Filing Officers which outlines the duties of filing officers. Contained in the Handbook is Regulation 18110, which identifies the specific items that filing officers must review on the campaign disclosure statements. (See Appendix B.)

In addition, campaign statements filed by unsuccessful candidates during the past four years should receive a full review for the years 1987 and 1988, and a facial review for 1985 and 1986. A facial review consists of reviewing statements for the following items: (1) The cover sheet includes the name and address of the filer, the period covered and the type of statement; (2) the summary page is completed, and the required schedules are attached; (3) all information is legible, and readable reproductions of the statement can be made; and (4) the verification is complete.

^{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.

Carol Ann Butler
Page Two

Please do not hesitate to contact me at (916) 322-5662 if you have addition questions.

Sincerely,

Kathryn E. Donovan
General Counsel



By: Alice Hughes
Political Reform Consultant

Enclosure



FPPC
Oct 5 9 53 AM '89

October 2, 1989

Alice Hughes
Fair Political Practices Commission
Technical Assistance & Analysis Division
P. O. Box 807
Sacramento, Ca. 95804-0807

Dear Alice:

As we discussed on the telephone last week I would be very grateful if you could send me clarification regarding specifics on the FPPC Document check list.

You indicated that the forms prior to 1985 should be logged and filed; forms from 1985-89 logged and filed and filing officer is required to notify filer in writing if their name is deleted on form; forms filed from 1988-89 should be checked for any discrepancies as outlined in Filing Officer Manual, and that the filing officer is required to notify filer in writing of the specific discrepancy. As I understand only the forms filed for the past year need to be checked for discrepancies in order to notify filer of incomplete forms.

Alice, hopefully this will help me to streamline the checklist procedure. I've logged and filed all FPPC forms from 1975 to current, however, I still need something in writing from your office which would clarify exactly what I am responsible for in the notification procedure.

Thanks again for being so helpful during this "ordeal" - which it has certainly turned out to be.

Very truly yours,

Carol Ann Butler
Deputy City Clerk



California Fair Political Practices Commission

October 10, 1989

Carol Ann Butler
Deputy City Clerk
P.O. Box 3707
Sunnyvale, CA 94086-3707

Re: Letter No. 89-579

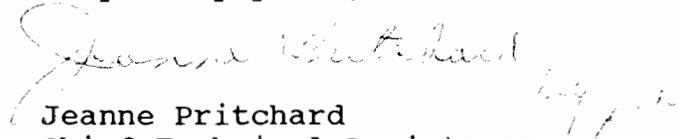
Dear Ms. Butler:

Your letter requesting advice under the Political Reform Act was received on October 5, 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,


Jeanne Pritchard
Chief Technical Assistance
and Analysis Division

JP:plh

Carol Ann Butler
Page Two

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Sincerely,

Kathryn E. Donovan
General Counsel



By: Alice Hughes
Political Reform Consultant

Enclosure



FPPC
OCT 5 9 53 AM '89

October 2, 1989

Alice Hughes
Fair Political Practices Commission
Technical Assistance & Analysis Division
P. O. Box 807
Sacramento, Ca. 95804-0807

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Very truly yours,

A handwritten signature in cursive script that reads "Carol".

Carol Ann Butler
Deputy City Clerk