



California Fair Political Practices Commission

November 15, 1989

Norrine Coyle
City Clerk
City of Modesto
P. O. Box 642
Modesto, CA 95353

Re: Combined Campaign Report
Our File No. I-89-623

Dear Ms. Coyle:

This is to confirm advice provided to your office on October 27, 1989, regarding the campaign disclosure provisions of the Political Reform Act (the "Act").^{1/} This letter constitutes written advice under Section 84205.

Section 84205 states:

The Commission may by regulation or written advice permit candidates and committees to file campaign statements combining statements and reports required to be filed by this title.

A special election has been called in the City of Modesto to fill a vacant seat on the City Council. The election date is January 30, 1990. Because the second pre-election statement due in connection with the special election (Section 84200.8) and the semi-annual statement due for the last six months of 1989 (Section 84200) cover overlapping periods, we believe it is appropriate for candidates being voted on in that election, their controlled committees and committees primarily formed to support or oppose candidates in that election to combine those two reports.

Therefore, campaign disclosure statements should be filed on the following schedule:

^{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.

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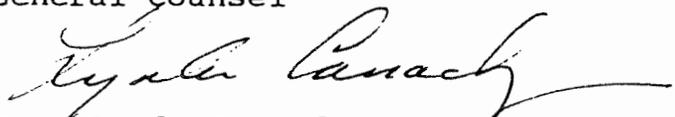
<u>Type of Statement</u>	<u>Period Covered</u>	<u>Filing Deadline</u>
1st Pre-Election	Jan. 1 ^{2/} - Dec. 16	December 21, 1989
2nd Pre-Election Combined with semi-annual statement for the second half of 1989	Dec. 17 - Jan. 13	January 18, 1990
Semi-Annual	Jan. 14 - June 30	July 31, 1990

The contribution limitations imposed by Proposition 73 apply separately for a special election and are the same amounts as the limitations for a fiscal year. A contributor may contribute up to the stated limits (see attached) in the special election cycle, less any amount contributed during the fiscal year which the candidate transfers to his or her special election committee bank account.^{3/} For your reference, "special election cycle" means the day on which the office becomes vacant until the day of the special election.

If you have any questions regarding the above, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Kathryn E. Donovan
General Counsel



By: Lynda Cassady
Political Reform Consultant

^{2/} The period covered by any statement begins on the day after the closing date of the last statement filed or January 1 if no previous statement has been filed.

^{3/} See enclosed proposed temporary order in Service employees international union, et al. v. Fair Political Practices Commission, U.S. District Court, Eastern District of California, Case No. CIVS 89-0433 LKK-JFM. The court will hold a hearing on this issue on November 15, 1989, and issue a permanent order on or after that date.

<u>CONTRIBUTOR</u>	<u>RECIPIENT</u>	<u>LIMITATION/FISCAL YEAR SPECIAL/RUNOFF ELECTION</u>
Person (Includes individuals, corporations, partnerships, etc.)	Candidate	\$1,000 (Total aggregate amount for all committees controlled by the recipient)
Political Committee (Does not include any committee controlled by a candidate)	Candidate	\$2,500 (Total aggregate amount for all committees controlled by the recipient)
Broad Based Political Com. (Does not include any committee controlled by a candidate)	Candidate	\$5,000 (Total aggregate amount for all committees controlled by the recipient)
Political Party	Candidate	\$5,000 (Total aggregate amount for all committees controlled by the recipient)
Candidate A's Personal Funds	Candidate A's Controlled Com.	NO LIMIT
Candidate A's Controlled Com.	Candidate B's Controlled Com.	ALL CONTRIBUTIONS BETWEEN CANDIDATES' CONTROLLED COMMITTEES ARE PROHIBITED
Candidate A's Personal Funds	Candidate B's Controlled Com.	\$1,000 (Total aggregate amount for all committees controlled by the recipient)

<u>CONTRIBUTOR</u>	<u>RECIPIENT</u>	<u>LIMITATION/FISCAL YEAR SPECIAL/RUNOFF ELECTION</u>
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Candidate A's Controlled Com.	Candidate B's Controlled Com.	ALL CONTRIBUTIONS BETWEEN CANDIDATES' CONTROLLED COMMITTEES ARE PROHIBITED
Candidate A's Personal Funds	Candidate B's Controlled Com.	\$1,000 (Total aggregate amount for all committees controlled by the recipient)