



California Fair Political Practices Commission

February 20, 1991

Rena Fugate
Chair, Fundraising Committee
Riverside County Democratic
Central Committee
P.O. Box 76
Palm Desert, CA 92260

Re: Your Request for Advice
Our File No. A-91-055

Dear Ms. Fugate:

You have requested advice concerning the campaign provisions of the Political Reform Act (the "Act").¹ In our telephone conversation of January 31, 1991, you clarified the question posed in your letter.

QUESTIONS

1. May the Riverside County Democratic Central Committee (the "Committee") establish a second bank account in order to keep funds raised through special fund-raising events separate from the general fund of the Committee?

2. May the Committee report receipt and expenditure of these separate funds along with those of the general fund on one campaign reporting statement?

CONCLUSIONS

1. The Committee may establish two bank accounts to receive contributions and to make expenditures.

2. When reporting the receipt and expenditure of special fund contributions and those of the general fund, the Committee must use one campaign reporting statement.

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.

Rena Fugate
Page Two

FACTS

The Riverside County Democratic Central Committee is a recipient committee.

It is your intention to undertake a special fundraising drive in 1991. In order to keep contributions raised by the drive separate from those in the general fund of the Committee, you propose to open a separate bank account.

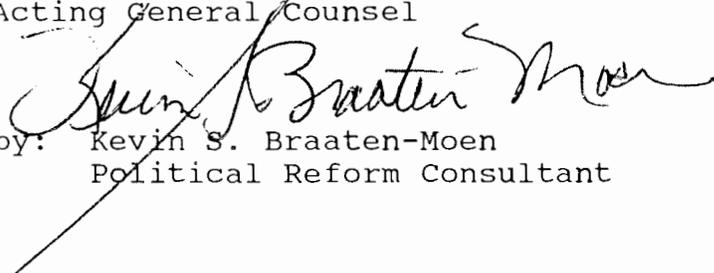
ANALYSIS

There is nothing in the Act to prohibit a general purpose committee from establishing more than one bank account. The financial activity in both accounts must be reported on one campaign reporting statement filed by the Committee. Section 84211 requires a committee to file a single statement.

If you have additional questions, please call me at (916) 322-5662.

Sincerely,

Scott Hallabrin
Acting General Counsel


by: Kevin S. Braaten-Moen
Political Reform Consultant

February 1991

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**RIVERSIDE COUNTY
DEMOCRATIC
CENTRAL COMMITTEE**

JAN 20 3 19 1991

President: Tom Jameson
Vice Chair East: Ray Strait
Vice Chair West: Dave Lanham
Secretary:
Treasurer: Betty Palmer
Parliamentarian: Sonja Wilson

January 16, 1991

FAIR POLITICAL PRACTICES COMMISSION
428 J Street
Sacramento, CA 95814

To Whom It May Concern:

The Riverside County Democratic Central Committee is undertaking a fundraising campaign during 1991. The goal of the campaign is to raise \$100,000.

As the Chair of the Fundraising Campaign, I have indicated that I would like to establish a separate organization to collect and hold the contributions. The funds raised will be used to support "generic" party activities and will not be used to support candidates or issues.

In order to accomplish this, and not be separated from the Central Committee, can the Fundraising Committee prepare a separate Statement 410 with a different Treasurer, submit it to the Central Committee and have them file the information with the FPPC? This Committee would collect the funds and deposit them in a separate interest bearing account. When the Central Committee identified programs which required funding, funds from this Committee would be paid out to the Central Committee for disbursement.

I would expect that our FPPC reports would be prepared and submitted to the Central Committee for inclusion in their FPPC reports to you. The Fundraising Committee would not file separately with FPPC.

Could you review my questions and respond in writing as to whether this makes sense in terms of reporting our fundraising activity? Our Central Committee is meeting on Sunday, February 3 and, if possible, I would appreciate your response by then. If a fax of your response is possible, I would appreciate the timeliness of this effort very much. My fax number is 619/346-2539. (Please call first so I can plug it in.)

If none of the foregoing makes sense or you need clarification, please contact me at 619/340-6655. Thanks so much for your help.

Sincerely,



Rena Fugate
Chair, Fundraising Committee