May 5, 2025

Margie Hieter Chief of the Political Reform Division California Secretary of State 1500 11th Street. Sacramento, CA 95814

Via email at: MHieter@sos.ca.gov

Re: Your Request for Advice
Our File No. A-25-068

Dear Margie Hieter:

This letter is in response to the request regarding the campaign provisions of the Political Reform Act (the "Act"). 1

QUESTION

May the candidates and committees involved in the Assembly District 63 August 26, 2025, special general election combine the semi-annual statement with the first pre-election statement due July 17, 2025?

CONCLUSION

In connection with the August 26, 2025, special general election, candidates and committees may use a filing schedule that combines the semi-annual campaign statement with the first preelection statement. The combined statement will be due on July 17, 2025, covering the period from the day after the closing date of the last statement filed, through July 12, 2025.

ANALYSIS

Candidates and committees are required to file two pre-election campaign statements during an election, disclosing contributions received and expenditures made in connection with that election. These statements are due 40 days before the election and again 12 days before the election. (Section 84200.8.) Semi-annual statements are due on January 31 and July 31, respectively. (Section 84200.)

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

A special election has been called for Assembly District 63, with the special general election set for August 26, 2025. The first semi-annual statement for 2025, covering the period from the day after the closing date of the last statement filed, through June 30, is due on July 31, 2025. The first pre-election statement filed in connection with this election would then cover the period of July 1 through July 12. It would be due on July 17, 2025, before the deadline for the semi-annual statement. The second pre-election statement is due on August 14, 2025, and covers the reporting period of July 13 through August 9.

There is a mechanism in the Act that permits combining statements when an overlapping reporting period occurs, or the filing of the semi-annual statement would be an additional, unnecessary filing to the two pre-election statements. (Section 84205.) Combining the first pre-election statement with the semi-annual statement would be appropriate for the district's August 26, 2025, special general election.

Accordingly, candidates and their controlled committees appearing on the August 26, 2025, ballot may combine the semi-annual statement with the first pre-election statement. The statement will cover the period from the day after the closing date of the last statement filed through July 12 and be due on July 17, 2025. A campaign statement filing schedule that outlines the due dates for filing statements is enclosed for your convenience.

If you have other questions on this matter, please contact me at (916) 322-5660.

Sincerely,

Dave Bainbridge General Counsel

By: Erika M. Boyd

Senior Counsel, Legal Division

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