

2025 CAL. FAIR-PRACT. LEXIS 104

California Fair Political Practices Commission , Advice Letters

November 25, 2025

CA Fair Political Practices Commission

Reporter

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Our File No. A-25-157

Dan Miller

Filing Official & Election Services

County of Marin Election Services

3501 Civic Center Drive, Room 121

San Rafael, CA 94903

Via email at: dan.miller@marincounty.com

Re: Your Request for Advice

November 25, 2025

Core Terms

elect, pre-election, semi-annual, campaign statement, candidate

Text

[*1] Dear Mr. Miller:

This letter responds to your request for advice on behalf of the County of Marin regarding the campaign provisions of the Political Reform Act (the "Act").¹

QUESTION

May the committees involved in the County's January 27, 2026, election combine the semi-annual statement with the second pre-election statement due January 15, 2026?

CONCLUSION

In connection with the January 27, 2026, election, committees may use a filing schedule that combines the semi-annual campaign statement with the second pre-election statement. The combined statement will be due on January 15, 2026, covering the period December 14, 2025, through January 10, 2026.

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.

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 filed 40 days before the election and again 12 days before the election. (Section 84200.8.) Semi-annual statements are filed on January 31 and July 31, respectively. (Section 84200.)

The County of Marin is holding a special election on January 27, 2026. The year-end semi-annual statement [*2] for 2025, covering the period through December 31, is due on February 2, 2026. The second pre-election statement, however, would cover the period from December 14, 2025, through January 10, 2026. It would be due on January 15, 2026, before the deadline for the semi-annual statement.

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 second pre-election statement with the semi-annual statement would be appropriate for the County's January 27, 2026, election.

Accordingly, candidates and their controlled committees appearing on the January 27, 2026, ballot may combine the semi-annual statement with the second pre-election statement. The statement will cover the period of December 14, 2025 through January 10, 2026 and be due on January 15, 2026. 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 [*3]

General Counsel

By: Erika M. Boyd

Senior Counsel, Legal Division

CA Fair Political Practices Commission

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