

A-28-179

March 14, 1978

Mr. Bradner Petersen
100 Universal City Plaza
Universal City, California 91608

Dear Mr. Petersen:

Thank you for your letter of January 21, 1978.

I refer you first to the language of Government Code Section 84204.1(a)(3): Unless a major donor's primary political activity relates to the local jurisdiction, he is qualified to use the abbreviated statement, Form 480, in connection with elections occurring at any time other than the state Direct Primary or General elections in even-numbered years.

The Form 480 is filed only in the local jurisdiction in which the major donor's activity takes place. However, by 84204.1(b) the information contained in the abbreviated statement must be repeated in any subsequent statement filed, except that the itemization of contributions and expenditures may be incorporated by reference if the subsequent statement and copies are filed with the same officers as the abbreviated statement. In addition, by Section 82018 an abbreviated statement does not qualify as a post-election statement, and the amounts reported on abbreviated statements must be cumulated forward to the next post-election statement, or, in the case of a major donor, to the end of the calendar year if no post-election statements are filed during the year.

When the next regular statement, i.e., a semi-annual statement (see Government Code Section 84206) or a statement in connection with a state Direct Primary or General election in even-numbered years is filed, it will be necessary to pick up, repeat, and carry forward the information reported on any abbreviated statements filed since the last semi-annual or state election statement. This semi-annual statement, or a statement filed in connection with the state Direct Primary or General election in even-numbered years must be filed with the relevant filing officers for each candidate supported during the cumulation cycle covered (see Government Code Section 81005), including those local jurisdictions in which abbreviated statements were filed during that cumulation cycle.

Mr. Bradner Petersen

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I realize this answer may do more to confuse than illuminate, but you have asked a very complex question in general terms. If you have a specific problem in which you need advice, please call me at (916) 322-5662.

Sincerely,

John Giansello
Political Reform Analyst

JG:bw

BRADNER PETERSEN

ATTORNEY AT LAW

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JAN 23 11 53 AM '78
January 21, 1978

Fair Political Practices Commission
1100 Kay Street
Sacramento, California 95814

Gentlemen:

A major donor which from time to time files copies of campaign statements with various governmental officials, desires a clarification or interpretation of Part IV of your Information Manual on Campaign Disclosure Provisions of the Political Reform Act. Part IV is entitled "Where Must Statements Be Filed?"

If a campaign statement is filed with the City Clerk of a city with reference to contributions to candidates for or persons holding elective office in the city involved, is it also necessary to report to the City Clerk contributions during the same filing period to candidates for statewide office? Similarly if campaign statements are filed with the Secretary of State (plus the Registrar-Recorder of Los Angeles County and the Registrar of Voters of San Francisco) with reference to contributions to candidates for or persons holding statewide elective office, is it also necessary to report to the Secretary of State, etc. contributions during the same filing period to candidates for office in a city?

I prefer that this be treated as a request for an informal clarification or interpretation. If that is not possible, would you kindly process this as a request for an opinion.

Very truly yours,



Bradner Petersen

BP:eh