

79-017

September 25, 1979

Ms. Julie Watt, Treasurer  
California College Republicans  
P.O. Box 75466  
Los Angeles, California 90075

Dear Ms. Watt:

I am responding to your request for advice of September 7, 1979, concerning the filing obligations of the California College Republicans under the Political Reform Act.

I have been informed by Anthony Miller, Chief Counsel for the Secretary of State, that the Secretary of State's Office has determined to grant you a waiver of the fine imposed in their letter of February 27, 1979, to Britta Skavdahl. The Secretary of State's Office will notify you directly and officially of this action.

Assuming your fine to be waived there would appear to be no further matter on which you need advice from us at this time.

I would, however, suggest that you look into Government Code Sections 82015 and 82025, the definitions of "contribution" and "expenditure", which determine whether a person or group becomes a committee with filing obligations under Government Code Sections 82013 and 84100-84305.

The above definitions of "contribution" and "expenditure" are further defined by regulations in 2 Cal. Admin. Code Sections 18215 and 18225.

Briefly, if you do not receive or make payments for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate or candidates or the qualification or passage of any measure and if you do not make payments used for communications which expressly advocate the nomination, election or defeat of a clearly identified candidate or candidates or the qualification, passage or defeat of a clearly identified ballot measure - if, in other words, your activity is confined solely to the maintenance of your membership

organization and its generalized political objectives - then you would very likely be making and receiving no contributions or expenditures and would incur no reporting obligations under the Act.

If this is the case, you have erroneously filed a statement of organization as a recipient committee. There is no need for an organization that is not in fact a recipient committee to have an identification number for any Political Reform Act purpose. If you wish, you may terminate your status as a filed committee by completing Form 415 and sending it to the Secretary of State.

I hope this advice has been helpful. If you are still uncertain about whether the particular facts of your organization's activity relieve you of filing obligations, you may call me at 916/322-5901.

Sincerely,

John D. Giansello  
Political Reform Analyst

JDG:bw

# California College Republicans

79017

SEP 11 9 22 AM '79

September 7, 1979

Fair Political Practices Commission  
P.O. Box 807  
Sacramento, California 95804

Dear Sirs:

I am writing to ask your opinion on the situation of the California College Republicans and our status with the Secretary of State's Office.

We applied for a Political I.D. number earlier this year. According to the Secretary of State's office we filed late and a fine of \$100.00 was imposed on our organization. Enclosed is a copy of our application for the Political I.D. number, the letter from the Secretary of State's office regarding the fine, and our request for a waiver of the fine.

We only wanted an Identification number to give to the contributors to our organization if they requested one. The purpose of the California College Republicans is to promote and encourage involvement in the Republican Party on College campuses. We do not contribute to individual campaigns or candidates. Therefore, under Proposition 9, are we required to file periodic reports with the Secretary of State and if so, what must these reports contain.

Our political identification number is 790245. Please send an opinion on this matter to me at the following address;

California College Republicans  
Julie Watt, Treasurer  
P.O. Box 75466  
Los Angeles, California 90075

Thank you,

*Julie Watt*  
Julie Watt

Hunt Braly  
President  
Richard Manning  
Executive V.P.  
Joe Vliestra  
Administrative V.P.  
Dave Barbour  
Assistant V.P.  
Bill Michaelson  
Northern V.P.  
Maureen Armstrong  
Southern V.P.  
Tom Van Voorst  
General Representative  
Julie Watt  
Treasurer  
Claudia Dochterman  
Secretary  
Audrey Merkin  
Nat'l Vice Chrm. CRNC  
Lisa Colvin  
Western Fed. Co-Chrm.

#### AREA DIRECTORS

Richard Flannery  
Holly Espinoza  
Greg Pettis  
Eric Tully  
Karen Bartram  
Kevin White  
Doug Cope  
Steve Morrow  
Paula Lubniewski  
Pete Radin  
Steve Opson  
Randy Mc Cosker  
Martin McClure

Elena Freshman  
Corresponding Secretary   enclosures  
Bob Wolfe  
Financial V.P.  
Kim Picou  
Special Projects V.P.



Form 410

1978

FILE AN ORIGINAL AND ONE COPY OF THIS FORM WITH:

Secretary of State  
Political Reform Division  
P. O. Box 1467  
Sacramento, CA 95807

STATEMENT OF ORGANIZATION (RECIPIENT COMMITTEE)  
(Government Code Section 84101-84103)

RECEIVED  
AND FILED

In the office of the Secretary of  
of the State of California

FEB 15 1979

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MARCH FONG EU, Secretary of St

(Type or Print in Ink)

790245

FULL NAME OF COMMITTEE: The California College Republicans					IF AMENDMENT, INCLUDE I.D. NO.	
STREET ADDRESS OF COMMITTEE: (Not P.O. Box)		NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE PHON
		10815 Escobar	San Diego	Ca.	92124	(714) 879-857
DATE QUALIFIED AS COMMITTEE (Mo., Day, Yr.): November 27, 1973				A	OFFICIAL USE ONLY	B OFFICIAL USE

I TREASURER AND OTHER PRINCIPAL OFFICERS

POSITION	NAME AND PERMANENT STREET ADDRESS	(AREA CODE)	PHONE NO.
TREASURER	Britta M. Skavdahl 2404 E. Nutwood #L21 Fullerton, Ca 92631	714-	879-857
Chairman	Audrey Merkin 10813 Escobar San Diego, Ca. 92124	702-382-476	714-560-0035
Secretary	Lisa Colvin 522 Glenrock #1 Los Angeles, Ca. 90024	213-	479-2552
Exec. V.P.	Hunt Eraly 401 S. Harvard #215 Los Angeles, Ca. 90020	213-	382-9339

Attach additional information on appropriately labeled continuation sheets.

II IS THIS A CONTROLLED COMMITTEE?

(A controlled committee is one which is controlled directly or indirectly by a candidate or which acts jointly with a candidate or committee in connection with the making of expenditures. A candidate controls a committee, if he, his agent or any other committee controls, has significant influence on the actions or decisions of the committee)

YES (Complete Section III)

NO (Section III is not applicable)

III CANDIDATES AND COMMITTEES BY WHICH THIS COMMITTEE IS CONTROLLED OR WITH WHICH IT A JOINTLY

FOR OFFICIAL USE ONLY	NAME OF CANDIDATE OR COMMITTEE	IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS

Attach additional information on appropriately labeled continuation sheets.

IV ORGANIZATIONS, IF ANY, WITH WHICH THIS COMMITTEE IS AFFILIATED OR CONNECTED

NAME AND STREET ADDRESS	(AREA CODE)	PHONE NO.
Republican State Central Committee of Ca. 2002 Riverside Dr. Los Angeles	213-	660-5000

Attach additional information on appropriately labeled continuation sheets.

YOU MUST COMPLETE THE VERIFICATION ON PAGE 2



Office of the Secretary of State  
March Fong Eu

1230 J Street  
P.O. Box 1467  
Sacramento, California 95807

POLITICAL REFORM DIVISION  
(916) 322-4880

February 27, 1979

Ms. Britta M. Skavdahl, Treasurer  
The California College Republicans, ID#790245  
10813 Escobar  
San Diego, CA 92124

Dear Ms. Skavdahl:

Thank you for filing your Recipient Committee Statement of Organization (Form 410), executed on February 3, 1979. This letter is to assign your committee identification number and to notify you of the liability for filing your statement after the specified deadline.

#### ASSIGNMENT OF COMMITTEE IDENTIFICATION NUMBER

Your committee's identification number is 790245. All correspondence and future campaign disclosure statements must include this identification number. Your committee should also advise candidates and committees to which you make contributions or expenditures of your identification number.

#### NOTICE OF LATE FILING LIABILITY

Form 410 requires that "date qualified as committee" be provided. Committees must file a Statement of Organization with our office within 10 days of the date on which they qualify.

#### Explanation of "Date Qualified"

"Date qualified" refers to the date on which your committee received contributions totalling \$500 or more during the calendar year. If your committee did not qualify on the date you indicated, you should complete the enclosed Form 405 (Amendment to Campaign Disclosure Statement) and report the exact date (day, month, year) on which your committee qualified.

If your committee has not yet qualified but needs a committee identification number, you should complete the enclosed Form 405 and indicate that the committee has not yet qualified. IT IS NOT NECESSARY TO FILE ANOTHER STATEMENT OF ORGANIZATION WHEN THE COMMITTEE DOES QUALIFY.

According to the date you indicated on your Statement of Organization, you did not, as required by law, file your statement within ten days of qualification and therefore you have been fined.

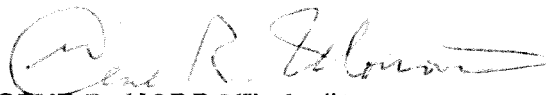
Ms. Britta M. Skavdahl  
February 27, 1979  
Page 2

Committees filing a statement after a specified deadline are liable in the amount of \$10 per day for each day late, up to a maximum fine of \$100. YOU HAVE INCURRED A LIABILITY OF \$100.00. The Political Reform Act permits waiver of the liability in certain limited cases. If your Statement of Organization was filed late, you may complete the enclosed "Request for Waiver". We will notify you of the results of your request.

If you have any questions pertaining to this letter, please contact this office. If your questions are of an interpretive nature, please contact the Technical Assistance and Analysis Division of the Fair Political Practices Commission at (916) 322-5662 in Sacramento or (213) 620-5196 in Los Angeles.

Sincerely,

WILLIAM N. DURLEY  
Assistant to the Secretary of State  
Elections and Political Reform

  
GENE R. MORROW, Auditor  
Political Reform Division

cc: Fair Political Practices Commission

**REQUEST FOR WAIVER OF LIABILITY**  
(Government Code Section 91013)

- (1) NAME OF LATE FILER California College Republicans
- (2) ADDRESS OF LATE FILER 10813 Escobar San Diego, CA. 92124
- (3) TELEPHONE NUMBER OF LATE FILER 714-560-0035
- (4) TYPE OF STATEMENT FILED LATE Statement of Organization(Recipient)
- (5) PERIOD COVERED ON STATEMENT \_\_\_\_\_
- (6) DATE STATEMENT SHOULD HAVE BEEN FILED Not necessary
- (7) HAVE YOU PREVIOUSLY FILED ANY STATEMENT OR REPORT UNDER THE POLITICAL REFORM ACT AFTER A DEADLINE? YES \_\_\_ NO X. IF YES, IDENTIFY THE STATEMENT(S) FILED AFTER THE DEADLINE (e.g. 1976 post-General Election, January 1977 lobbyist report).

- (8) STATE IN FULL ON REVERSE SIDE THE REASON WHY THE STATEMENT WAS FILED AFTER THE DEADLINE AND WHY YOU BELIEVE THE LIABILITY SHOULD BE WAIVED.

I declare and certify under penalty of perjury that the foregoing information on this request for waiver is true and correct. I hereby request that the liability for failing to file a statement required by the Political Reform Act on time be waived.

EXECUTED ON March 21, 1979, AT Los Angeles,  
(Month, day) (City)

California

(State)

Hunt Braly  
(Signature)

Hunt Braly

(Type or print name)

**FOR OFFICE USE ONLY**

Form    Date Due    Date Filed    Liability

NONFILER LETTERS:    1st Cert Signed    2nd Cert Signed

OUTSTANDING LIABILITIES:    2nd Notice    Cert Signed

NONFILING REFERRALS:    \_\_\_ No \_\_\_ Yes (If yes, date referred \_\_\_\_\_)

NONPAYMENT REFERRALS:    \_\_\_ No \_\_\_ Yes (If yes, date referred \_\_\_\_\_)

COMMENTS:

**ACTION:**

\_\_\_ Waived

\_\_\_ Reduced/Amount Fined \_\_\_\_\_

\_\_\_ Waiver not consistent with GCS 91013

\_\_\_ No response within ten-day period

\_\_\_ No response within five-day period (2nd pre-election only)

\_\_\_ Waived upon reconsideration

\_\_\_ Denied upon reconsideration

\_\_\_ Reduced upon reconsideration

In a phone conversation with Mr. Gene Morrow, he indicated to me that if we felt that there was no legal requirement for the California College Republicans to file then that would be a foolproof ground for a waiver of the \$100 fine imposed on February 27, 1979.

The sole purpose for the California College Republican's filing of an Organization statement was to obtain a political ID number to give to contributors who requested it. We were never informed, until my phone conversation with Mr. Morrow, that a political ID number may be obtained even though you don't meet the legal requirements of mandatory filing.

Through discussions with Mr. Allison for the Secretary of State's office in Los Angeles, the California College Republicans has determined that it is not required to mandatorilly file a Statement of Orgaminzation for a Recipient Committee. Therefore we request that the fine be waived.