

87201 ✓
84205

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ••• 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance •• Administration •• Executive/Legal •• Enforcement •• Statements of Economic Interest
(916) 322-5662 322-5660 322-5901 322-6441 322-6444

September 1, 1981

Alice A. Hare
City Clerk
City Hall
Riverside, CA 92522

A-81-09-050

Dear Ms. Hare:

This is in reply to your letter dated August 10, 1981, concerning the campaign filing schedule for candidates in the Riverside general municipal election to be held on November 3, 1981, and in a possible run-off election to be held on either January 5 or January 12, 1982.

For those candidates who are involved in both the general election and the run-off election, the second pre-election statement due in connection with the run-off, and the semi-annual statement due in connection with the November 3 election may be combined. By combining the 2nd pre-election statement and the final semi-annual statement, the filing schedule for candidates involved in both the general election and the possible run-off election would be:

<u>Statement</u>	<u>Period Covered</u>	<u>Filing Deadline</u>
3rd Threshold	July 1-Sept. 17	Sept. 22
4th Threshold	Sept. 18-Oct. 17	Oct. 22
1st Pre-election	Oct. 18-Nov 21 or Nov. 28	Nov. 26 or Dec. 3
2nd Pre-election/ Semi-Annual	Nov. 22 or Nov. 29- Dec. 31	Jan. 5
Post-election	Jan. 1-Mar. 4 or Mar. 11	Mar. 11 or Mar. 18

8/1/81

Alice A. Hare
September 1, 1981
Page Two

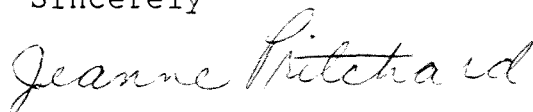
This filing schedule would provide for the filing of campaign statements covering the periods prescribed by Government Code Section 84200, and would eliminate the burden of filing an additional campaign statement covering a very short period of time (a 5- or 12-day period from the end of the 2nd pre-election statement through the end of the year).

Regarding your questions about the \$500 threshold, and the use of the Form 470, recent legislation has amended Government Code Section 84205 to permit the use of the short form by all candidates regardless of their election dates. Although there are no thresholds for statements filed in connection with elections, candidates who have not raised or spent and do not intend to raise or spend \$500 or more in connection with their elections may file a Form 470 on or before the filing deadline for the first campaign statement in connection with the election, and will not be required to file any additional campaign statements unless their receipts or expenditures reach \$500. Threshold statements need be filed only if the level of activity reaches \$500, so the Form 470 is not applicable to threshold statements. Semi-annual statements must be filed if any activity has occurred during the six-month period covered; however the Form 470 may be filed as the semi-annual statement if the level of activity has been less than \$500.

Therefore, the Riverside candidates need file the 3rd and 4th threshold statements only if their level of activity is \$500 or more; if their level of activity is less than \$500, no filing is required. They must file the semi-annual statement if they have had any activity during the six-month period; however, if their level of activity is less than \$500, they may file the Form 470. They are required to file the 1st and 2nd pre-election statements and the post-election statement regardless of their level of activity; however, if they have not raised or spent and do not intend to raise or spend \$500 or more during the entire calendar year, they may file the Form 470 on or before September 22, and thereby eliminate the necessity of filing any additional campaign statements.

I hope this has adequately clarified the questions you raised. If you have any further questions, please call our office.

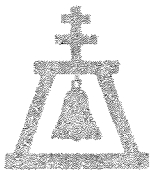
Sincerely



Jeanne Pritchard
Political Reform Consultant

Aug 12 12 40 PM '81

81050



August 10, 1981

ALICE A. HARE
City Clerk

Fair Political Practices Commission
1100 K Street
Sacramento, CA 95814

Re: Campaign Disclosure Provisions of
the Political Reform Act

Gentlemen:

In attempting to work out a filing schedule for our City candidates, I find the filing periods and dates of the Regular Municipal Election and our Special Run-Off Election, if any, to be so overlapping as to be quite unclear to me. I therefore request your advice.

The City of Riverside holds its General Municipal Election on November 3, 1981, and candidates would therefore file under Section C, page 6, of the Manual.

The run-off election will be either January 5 or January 12, as called by the City Council after the canvass of the November 3, 1981, election. Our charter provides that, if no one candidate for an office receives a majority of the votes cast, a run-off election will be held for those two candidates receiving the most votes not less than 45 nor more than 70 days following the first election. Because of the Christmas and New Year holidays, this election is always scheduled more than 60 days after the Regular Election. Therefore, the run-off schedule at the top of page 7 cannot be used. As I read the manual, the schedule under Section D, at the top of page 8, must apply; which results in the following filing schedule for candidates involved in both the Regular and Run-off Elections:

	<u>\$500 Threshold Period - or Period covered</u>	<u>Filing Deadline</u>
*3rd Threshold	July 1-Sep 17	Sep 22
*4th Threshold	Sep 18-Oct 17	Oct 22
**1st Pre-Election	From Oct 18 thru Nov 21 or Nov 28 (period may be longer if 3rd or 4th threshold statements are not filed)	Nov 26 or Dec 3
**2nd Pre-Election	From Nov 22 or Nov 29 thru Dec 19 or Dec 26 31	^{28 Jan. 5} Dec. 23 or Dec 30
*Semi-Annual	From Dec 19 or Dec 26 thru Dec 31	Jan 31, 1982
**Post-Election	From Dec 31 thru Mar 4 or Mar 11	Mar 11 or Mar 18

*Required for November 3 regular election

**Required for January 5 or 12 run-off election

August 10, 1981

Further, I am totally confused by the \$500 threshold. The note in the box at the bottom of page 7 of the manual states there are no thresholds for statements filed in connection with elections and that pre- and post-election statements must be filed regardless of whether or not there has been any reportable activity. However, candidates who anticipate spending less than \$500 on their campaign can avoid filing these statements by filing a Form 470.

However, the note in the right hand bottom corner of Page 11 states that Form 470 may not be used by candidates who are not being voted upon in 1981 or candidates whose election date is November 3, 1981, (seeming to provide that Form 470 may not be used by any Riverside candidates.) Such candidates file threshold statements which are required only if \$500 or more has been raised or spent during a threshold period.

Therefore, am I to tell candidates that they need file the 3rd and 4th threshold statements only if they have \$500 in activity, but that they must file the 1st and 2nd pre-election statements, the semi-annual statement and the post-election statement, and may not use Form 470 in any case?

Thank you for your early reply.

Very truly yours,

ALICE A. HARE
City Clerk