

State of California



Fair Political Practices Commission

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June 5, 1981

A-81-178

Kelly Kimball
California Coalition to
Stop the Peripheral Canal
1107 Ninth Street, Suite 1023
Sacramento, CA 95814

Dear Mr. Kimball:

This is to confirm our telephone conversation regarding the obligations of the Coalition to file threshold statements under Government Code Section 84200(b).

As I indicated to you in our telephone conversation, there is a discrepancy between the requirements contained in Government Code Section 84200(b) and the information contained in the "1981 Information Manual on Campaign Disclosure Provisions of the Political Reform Act." It is the Commission's policy that in the event such a discrepancy occurs, a person who has received a correct interpretation of the law from the Commission's staff is required to comply with the staff's advice, rather than with the information contained in the manual.

Government Code Section 84200(b) states that in addition to the semi-annual campaign statements due on July 31 and January 31, which are required if there has been any activity during the half-year covered, campaign statements reporting activity during a threshold period may also be required. Elected officers, candidates, and their controlled committees, and committees primarily formed to support or oppose a candidate, are excepted from this required reporting under Section 84200(b)(4) which states that:

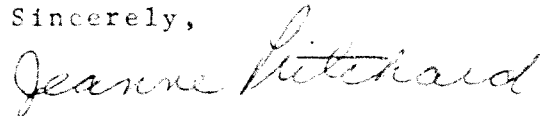
Notwithstanding the above, elected officers, candidates, and their controlled committees and committees formed primarily to support or oppose a candidate whose activities within a threshold period consist only of receiving contributions and making expenditures solely in connection with their own or their candidates campaigns are not required to file campaign statements pursuant to this subdivision during any six-month period (from

January 1 to June 30 or from July 1 to
December 31) in which the candidate's
office is not to be voted on....

Since the Coalition is a committee formed primarily to support or oppose a ballot measure, it does not come under the provisions for committees described under Section 84200 (b)(4). Therefore, the Coalition must file campaign statements for the threshold periods if it has met the single criterion--making expenditures of \$500 or more or making or receiving contributions of \$500 or more during a threshold period.

Please contact me if you have any additional questions.

Sincerely,



Jeanne Pritchard
Political Reform Consultant