

A-81-180

April 20, 1981

Dick Bryant
Los Angeles County
Registrar-Recorder's Office
P.O. Box 30450
Los Angeles, CA 90022

Dear Mr. Bryant:

This is in reply to two questions you posed during our telephone conversation of a couple weeks ago.

Your first question was whether a major donor committee may file a Form 400, "Declaration of Final Campaign Statement," after it has filed two threshold statements. The answer to this question is no. Form 400 is for use by a candidate or committee which has filed a pre-election campaign statement in connection with an election under Government Code Section 84200(c). Major donor committees always file campaign statements pursuant to Government Code Section 84200(a) and (b), which requires them to file on the six fixed-date filing schedule. Therefore, if a major donor committee meets the criteria for filing threshold statements, it will always have to file a semi-annual statement covering the entire half-year during which it was required to file a threshold statement.

Your second question was whether a major donor committee may file a Form 421, "Voluntary Report of No Activity." Major donor committees may file a Form 421, but, because they are only required to file campaign statements for threshold periods and for the period covered for semi-annual statements if they have had the types of activities described in Section 84200(a) and (b), the failure to file campaign statements should indicate that they have not had any reportable activity.

I hope this adequately answers your questions. If you have any further questions, please contact me.

Sincerely,

Jeanne Pritchard
Political Reform Consultant

JP/bb