



# California Fair Political Practices Commission

March 30, 1989

Charles E. Knutsen, Chair  
Democratic Party of San Fernando Valley  
9140 Van Nuys Blvd., #213  
Panorama City, CA 91402

RE: Your Request for Advice  
Our File No. A-89-077

Dear Mr. Knutsen:

You have requested advice concerning prohibitions under the campaign provisions of the Political Reform Act of 1974 ("the Act").<sup>1/</sup>

## QUESTION

Is the Democratic Party of San Fernando Valley prohibited from making reimbursements to individuals for out-of-pocket expenses they have made on behalf of the PAC?

## CONCLUSION

The Democratic Party of San Fernando Valley may make reimbursements to individuals for expenditures they have made on behalf of the committee. There is no prohibition against a non-controlled general purpose committee making reimbursements to individuals who have made expenditures on its behalf.

## FACTS

The Democratic Party of the San Fernando Valley (the "PAC") is a general purpose recipient committee which does not make contributions to candidates.

## ANALYSIS

There is nothing in the Act that would prohibit a general purpose recipient committee from making reimbursements to campaign staff workers who make expenditures on behalf of the PAC. For any expenditure of \$100 or more to one vendor, the name and address of

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<sup>1/</sup> Government Code Sections 81000-91015. All statutory references are to the Government code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

Charles E. Knutsen  
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the individual being reimbursed, as well as the name and address of the vendor must be itemized on the committee's campaign disclosure statement. (Sections 84303, 84211(j).)

If an individual other than a campaign staff worker makes an expenditure on behalf of the committee, the individual would be making an "in-kind loan" to the committee. In-kind loans are a type of "contribution." (See the 1989 FPPC "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," page 96, for an explanation of reporting in-kind loans.)

If you have additional questions, please call me at (916) 322-5662.

Sincerely,

Diane M. Griffiths  
General Counsel



By:

Kevin S. Braaten-Moen  
Political Reform Consultant



## DEMOCRATIC PARTY

OF THE SAN FERNANDO VALLEY

~~11111 Sherman Way, Suite 1111~~

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**WE HAVE MOVED TO:**  
9140 Van Nuys Blvd. #213 - Panorama City, CA 91402 - [818] 893-9833

February 2, 1989

Fair Political Practices Commission  
Technical Assistance Office  
428 J Street  
Sacramento, CA 95804

To Whom It May Concern:

I am Chair of the Democratic Party/San Fernando Valley, an all volunteer organization. I have a question regarding reimbursement for expenses.

As I understand it, Proposition 68 forbids reimbursement for expenses out of pocket by individuals working for a given candidate or campaign. It is also my understanding that neither Proposition 68 or 73 forbid reimbursements in regard to organizations such as ours.

My belief was confirmed during a telephone conversation this morning with an FPPC consultant named, "Kevin"; however, my treasurer remains unconvinced. She would like an opinion in writing.

We are not, as an organization, involved with fundraising for candidates or campaigns. Any fundraising done is strictly for the purpose of maintaining our office and communications with with the Democratic clubs in our area.

To ease my treasurer's mind, may I have a clarification, in writing, regarding reimbursements in our situation? I would appreciate it.

Sincerely,

Charles E. Knutsen, Chair

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**DEMOCRATIC PARTY**

OF THE SAN FERNANDO VALLEY

18546 Sherman Way, Suite 404 - Roseda, California 94385 - (818) 996-8884

**WE HAVE MOVED TO:**

9140 Van Nuys Blvd. #213 - Panorama City, CA 91402 - [818] 893-9833

February 2, 1989

Fair Political Practices Commission  
Technical Assistance Office  
428 J Street  
Sacramento, CA 95804

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Charles E. Knutsen, Chair



## DEMOCRATIC PARTY

OF THE SAN FERNANDO VALLEY

9140 Van Nuys Blvd., Suite 213 • Panorama City, California 91402 • (818) 893-9833

March 24, 1989

Ms. Jeanne Pritchard  
Technical Assistance Office  
Fair Political Practices Commission  
428 J Street  
Sacramento, CA 95840

Dear Ms. Pritchard:

The enclosed letter was sent to your office on February 2, 1989. To date, other than a letter indicating that our request for information had been received, we have received no communication from your office.

In that the normal 21 days waiting period for replies has long been exceeded, we would appreciate an answer to our question as quickly as possible.

Sincerely,

*Charles E. Knutsen*

Charles E. Knutsen

*called 3/29/88*

FPPC

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# California Fair Political Practices Commission

February 8, 1989

Charles E. Knutsen  
Democratic Party of the  
San Fernando Valley  
9140 Van Nuys Boulevard  
Suite 213  
Panorama City, CA 91402

Re: Letter No. 89-077

Dear Mr. Knutsen:

Your letter requesting advice under the Political Reform Act was received on February 6, 1989 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

*Jeanne Pritchard (cc)*  
Jeanne Pritchard  
Chief Technical Assistance  
and Analysis Division

JP:ld