



California Fair Political Practices Commission

November 15, 1989

Karen Mathews, Chief Deputy
Registrar of Voters
County of Stanislaus
912 11th St., Room 100
Modesto, CA 95354

Re: Combined Campaign Report
Our File No. I-89-583

Dear Ms. Mathews:

This is to confirm advice provided to your office on October 2, 1989, regarding the campaign disclosure provisions of the Political Reform Act (the "Act").¹ This letter constitutes written advice under Section 84205.

Section 84205 states:

The Commission may by regulation or written advice permit candidates and committees to file campaign statements combining statements and reports required to be filed by this title.

A special election has been called for Assembly District 27. The election date is December 5, 1989, and a run-off election is to be held on January 30, 1990. Because the pre-run-off election statement due in connection with the January 30, 1990 election (Section 84200.8) and the semi-annual statement due for the last six months of 1989 (Section 84200) cover overlapping periods, we believe it is appropriate for candidates being voted on in that election, their controlled committees, and committees primarily formed to support or oppose candidates in that election to combine those two reports.

Therefore, campaign disclosure statements should be filed on the following schedule:

¹ 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.

<u>Type of Statement</u>	<u>Period Covered</u>	<u>Filing Deadline</u>
1st Pre-Election (for Dec. election)	Jan. 1 ² - Oct. 21	October 26
2nd Pre-Election (for Dec. election)	Oct. 22 - Nov. 18	November 23 ³
Pre-run-off Election ⁴ (for Jan. election) Combined with semi-annual statement for the second half of 1989	Nov. 19 - Jan. 13	January 18, 1990
Semi-Annual	Jan. 14 - June 30	July 31, 1990

The contribution limitations imposed by Proposition 73 apply separately for a special election cycle and for a special runoff election cycle. The limitations for each of these cycles are the same amounts as the limitations for a fiscal year. Contributors may contribute up to the stated limits (see enclosure) in the special election cycle and the special runoff election cycle, less any amount during the fiscal year which the candidate transfers to his or her special election committee bank account.⁵ In addition, contributors may contribute up to the stated limits in the special runoff election cycle to candidates being voted upon in the runoff election even if they contributed the maximum amounts in the fiscal year and in the special election cycle.

² The period covered by any statement begins on the day after the closing date of the last statement filed or January 1 if no previous statement has been filed.

³ Deadlines which fall on a Saturday, Sunday or official state holiday are extended to the next regular business day. Therefore, the second pre-election statement will be due on November 24, 1989.

⁴ Candidates who lose the December 5, 1989 election and their controlled committees are not required to file the pre-run-off election statement due on January 18, 1990. Instead, such candidates and committees will file a semi-annual statement covering November 19 - December 31, 1989. This statement will be due no later than January 31, 1990.

⁵ See enclosed proposed temporary order in Service Employees International Union, et al. v. Fair Political Practices Commission, U.S. District Court, Eastern District of California, Case No. CIVS 89-0433 LKK-JFM. The court will hold a hearing on this issue on November 15, 1989, and issue a permanent order on or after that date.

Karen Mathews
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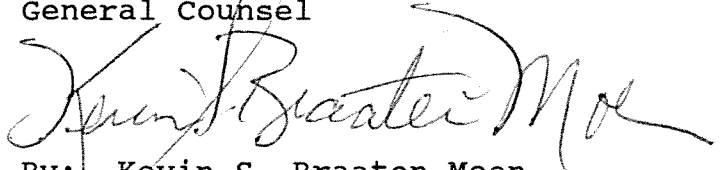
"Special election cycle" means the day on which the office becomes vacant until the day of the special election.

"Special runoff election cycle" means the day after the special election until the day of the special runoff election.

If you have any questions regarding the above, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Kathryn E. Donovan
General Counsel

A handwritten signature in cursive script, appearing to read "Kevin S. Braaten-Moen".

By: Kevin S. Braaten-Moen
Political Reform Consultant

Enclosure

cc: Secretary of State

<u>CONTRIBUTOR</u>	<u>RECIPIENT</u>	<u>LIMITATION/FISCAL YEAR SPECIAL/RUNOFF ELECTION</u>
Person (Includes individuals, corporations, partnerships, etc.)	Candidate	\$1,000 (Total aggregate amount for all committees controlled by the recipient)
Political Committee (Does not include any committee controlled by a candidate)	Candidate	\$2,500 (Total aggregate amount for all committees controlled by the recipient)
Broad Based Political Com. (Does not include any committee controlled by a candidate)	Candidate	\$5,000 (Total aggregate amount for all committees controlled by the recipient)
Political Party	Candidate	\$5,000 (Total aggregate amount for all committees controlled by the recipient)
Candidate A's Personal Funds	Candidate A's Controlled Com.	NO LIMIT
Candidate A's Controlled Com.	Candidate B's Controlled Com.	ALL CONTRIBUTIONS BETWEEN CANDIDATES' CONTROLLED COMMITTEES ARE PROHIBITED
Candidate A's Personal Funds	Candidate B's Controlled Com.	\$1,000 (Total aggregate amount for all committees controlled by the recipient)