



# California Fair Political Practices Commission

December 29, 1989

David Cameron  
2100-A G Street  
Sacramento, CA 95816

RE: Your Request for Informal  
Assistance  
Our File No. I-89-691

Dear Mr. Cameron:

You have asked several questions regarding where to file major donor reports required under the Political Reform Act.<sup>1</sup> Since your letter requests only general information, we are treating your request as one for informal assistance.<sup>2</sup>

## DISCUSSION

To determine where to file major donor campaign statements, you must first determine whether you qualify as a "state," "county" or "city" major donor committee. These are distinguished as follows:

"State" major donor committees are committees primarily formed to make contributions or independent expenditures to support or oppose state candidates or measures or any number of candidates or measures being voted upon in more than one county.

"County" major donor committees are committees primarily formed to make contributions or independent expenditures to support or oppose candidates or measures being voted upon in a single county election or in any number of jurisdictions wholly within a single county.

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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.

<sup>2</sup> Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Government Code Section 83114; 2 Cal. Code of Regs. Section 18329(c)(3).)

"City" major donor committees are committee which make contributions or independent expenditures to support or oppose candidates or measures being voted upon in a single city.

Major donor committee campaign statements are required to be filed as follows:

State Major Donor Committees:

- (1) The original and one copy with the Secretary of State;
- (2) Two copies with the Registrar-Recorder of Los Angeles County;
- (3) Two copies with the Registrar of Voters of the City and county of San Francisco.
- (4) Two copies with the clerk of the county in which the committee is domiciled\*

B. County Major Donor Committees:

- (1) The original and one copy with the clerk of the county in which the committee is active;
- (2) Two copies with the clerk of the county in which the committee is domiciled.\*

C. City Major Donor Committee:

- (1) The original and one copy with the clerk of the city.

\*If the committee address is outside California, Los Angeles will be considered the county of domicile.

As noted above, a major donor committee which has a non-California address must use Los Angeles County as their county of domicile. (Section 84215.) Additionally, a major donor committee which qualifies as a state major donor committee but also makes contributions to city or county candidates or measures is not required to file reports where a city or county major donor committee is required to file. However, a city or county major donor which later during a calendar year qualifies as another type of committee (e.g., a city committee becomes a county or state committee) must continue to file copies of its campaign statement in the original city or county, in addition to the other locations in which it is required to file. (Section 84215(g).)

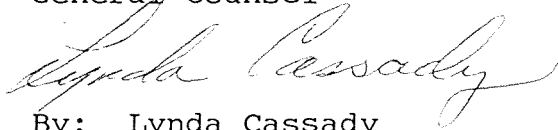
Additionally, no more than the original and one copy, or two copies, of a campaign statement must be filed with any one county or city clerk or with the Secretary of State. (Section 84215(f).)

Since major donor committees automatically terminate at the end of each calendar year, and must requalify as a new committee before they are required to file campaign statements in any subsequent year, a prior year's filing requirement does not affect the current year's filing requirements.

I have enclosed the FPPC "Informational Manual on Campaign Disclosure Provisions of the Political Reform Act for Major Donor Committees and Independent Expenditure Committees." However, please do not hesitate to contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan  
General Counsel

A handwritten signature in cursive script, appearing to read "Lynda Cassady".

By: Lynda Cassady  
Political Reform Consultant

Enclosure

FPPC

DEC 12 9 50 AM '89

David Cameron  
2100-A G Street  
Sacramento, CA 95816

December 11, 1989

Fair Political Practice Commission  
P.O. Box 807  
Sacramento, California 95804

Dear Gentleepersons:

If an individual, etc. contributes \$10,000 or more in California elections they qualify as a Major Donor if they are not already filing as a PAC, etc. I have several questions about where to file Major Donor reports.

If a non-Californian qualifies as a Major Donor for the first time by giving to one election in one county, where do they file?

If a non-Californian qualifies as a Major Donor for the first time by giving to one election that is in 2 counties, where do they file?

If a non-Californian qualifies as a Major Donor for the first time by giving to several elections in several counties, where do they file?

If a Californian from one county qualifies as a Major Donor for the first time by giving to one election within a county different from their own, where do they file?

If a non-Californian had filed a Major Donor statement in a previous year in one county and now contributes \$10,000 to an election in another county, where do they file?

If non-Californian qualifies as a Major Donor for the first time by contributing to a statewide initiative campaign, where do they file? Also if they had filed Major Donor statement previously does that have any bearing?

If a Californian residing in one county qualifies by giving to a statewide initiative in another county, where do they file?

Sincerely,



David Cameron



# California Fair Political Practices Commission

December 14, 1989

David Cameron  
2100-A G Street  
Sacramento, CA 95816

Re: Letter No. 89-691

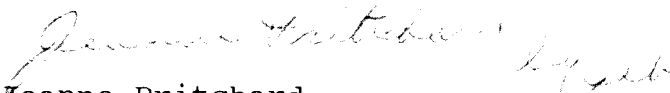
Dear Mr. Cameron:

Your letter requesting advice under the Political Reform Act was received on December 12, 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  
Chief Technical Assistance  
and Analysis Division

JP:plh