



# California Fair Political Practices Commission

February 23, 1990

L. G. Statham  
1008 Tenth Street, #514  
Sacramento, CA 95814

Re: Your Request for Advice  
Our File No. A-90-064

Dear Ms. Statham:

As treasurer for Assemblyman Stan Statham, you have requested advice concerning the campaign provisions of the Political Reform Act.<sup>1/</sup>

### QUESTION

How does a candidate who has two bank accounts determine which account to use when paying certain types of expenses?

### CONCLUSION

Expenditures for fundraising, campaign strategy, mass mailings, and other communications in connection with a future election, voter registration, and expenses for campaign consulting services or campaign staff must be paid from the 1990 campaign account. Other expenses related to political, governmental, or legislative activities may be paid out of either account.

### FACTS

Assemblyman Stan Statham has two bank accounts, one established prior to the passage of Proposition 73, and a campaign bank account established for the 1990 election. You have provided a list of various types of expenses and have asked which expenses should be paid from each account.

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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.

ANALYSIS

Regulation 18525 (copy enclosed) specifies the types of expenditures which are considered to be in connection with a future election and must be paid from a bank account established for that election. Officeholder or other expenses related to political, governmental, or legislative activities not covered under Regulation 18525 may be paid from either a campaign bank account established for a current term of office or from a campaign account established for election to a future term of the same office.

Please note that effective January 1, 1990, amendments to the Act placed certain restrictions on the use of campaign funds. (Sections 85800-85807.) Enclosed is a fact sheet which summarizes the new provisions.

If you have any additional questions please feel free to contact this office at (916) 322-5662.

Sincerely,

Kathryn E. Donovan  
General Counsel



By: Linda Moureaux  
Political Reform Consultant