



# California Fair Political Practices Commission

July 6, 1990

Kirk Alan Pessner  
Nielsen, Merksamer, Hodgson,  
Parrinello & Mueller  
650 California Street, Ste. 2650  
San Francisco, CA 94108

Re: Your Request For Advice  
Our File No. A-90-401

Dear Mr. Pessner:

You have requested confirmation of telephone assistance provided to you under the campaign provisions of the Political Reform Act (the Act)<sup>1/</sup> on behalf of your client Citizens for Fiscal and Economic Responsibility.

Your letter dated May 30, 1990, correctly summarizes my advice that a committee which is not a "primarily formed committee" is not required to file late contribution reports when it receives contributions during the late reporting period preceding an election.

Enclosed for your information is a copy of SB 2795 (Marks) which contains a proposed amendment to Section 82047.5 to include within the definition of "primarily formed committee" a committee primarily formed to support or oppose two or more measures being voted upon in the same city or county election. For the Commission's legislative package for next year, staff will ask that the Commission seek an author to further amend this definition to include a committee primarily formed to support or oppose two or more state measures being voted upon in the same election.

<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.

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If you have any questions about this letter, please call me  
at (916) 322-5662.

Sincerely,

Scott Hallabrin  
Acting General Counsel

*Jeanne Pritchard*

By: Jeanne Pritchard  
Chief, Technical Assistance  
And Analysis Division

enclosures