



California Fair Political Practices Commission

September 28, 1992

Charles P. Scully
300 Montgomery Street, Suite 735
San Francisco, CA 94104-1909

Re: Your Request for Advice
Our File No. A-92-493

Dear Mr. Scully:

This letter confirms the advice I provided to you on September 15, 1992, on behalf of the State Building and Construction Trades Council of California Political Action Committee (the "council") concerning the proper use of the council's campaign funds pursuant to the provisions of the Political Reform Act (the "Act").¹

As we discussed, Section 89510, et seq. governs the proper use of campaign funds and provides:

(a) This article applies to campaign funds held by candidates for elective office, elected officers, controlled committees, ballot measure committees, committees opposed to a candidate or measure, political action committees, and any committee which qualifies as a committee pursuant to subdivision (a) of Section 82013.

Section 89511(a).

Section 89512.5 provides that any expenditure by a committee must be, at a minimum, reasonably related to a political, legislative, or governmental purpose. Any expenditure by a

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.

committee that confers a substantial personal benefit on any individual or individuals with authority to approve the expenditure of campaign funds held by the committee must be directly related to a political, legislative, or governmental purpose of the committee.² (Section 89512.5(b).)

You asked specifically about the use of the council's campaign funds for voter registration activity. While under other circumstances voter registration activity is not deemed to be for political purposes (See, Steins Advice Letter, No. A-92-102), in the context of the regulation of "personal use" of campaign funds, voter registration activity appears to be reasonably related to a political, legislative, or governmental purpose associated with the committee. Consequently, campaign funds may be used for this purpose.

If you have any further questions regarding this matter, please feel free to contact me at (916) 322-5901.³

Sincerely,

Scott Hallabrin
Acting General Counsel

By: John W. Wallace
Counsel, Legal Division

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² Section 89511(b)(3) provides that a "substantial personal benefit" means an expenditure of campaign funds which results in a direct personal benefit with a value of more than \$100 to any individual or individuals with authority to approve the expenditure of campaign funds held by a committee.

³ Copies of Commission regulations and Opinions are available in many law libraries. Alternatively, copies of these materials and Commission advice letters may be obtained from the Commission at a cost of 10¢ per page.