



# California Fair Political Practices Commission

February 19, 1993

Christopher D.A. Meidl  
Hallgrimson, McNichols,  
McCann & Inderbitzen  
P.O. Box 10189  
5000 Hopyard Road, Suite 400  
Pleasanton, CA 94588-0189

Re: Your Request for Informal  
Assistance  
Our File No. I-93-046

Dear Mr. Meidl:

This is in response to your letter regarding the campaign disclosure provisions of the Political Reform Act (the "Act").<sup>1/</sup> Because you have not provided the identity of all of the parties on whose behalf you are seeking assistance, we consider your request to be one for informal assistance.<sup>2/</sup>

## QUESTION

Is an individual required to be listed as the sponsor of a committee if the committee receives 80% of its contributions from the individual?

## CONCLUSION

The individual is not required to be listed as the committee's sponsor.

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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. (Section 83114; Regulation 18329(c) (3).)

Christopher D.A. Meidl  
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### ANALYSIS

The Act requires that every recipient committee must file a statement of organization. (Section 84101.) If the committee is a "sponsored committee," the committee's name must include the name of its sponsor.

Section 82048.7 defines "sponsored committee" as follows:

(a) "Sponsored committee" means a committee, other than a candidate controlled committee, which has one or more sponsors. Any person, except a candidate or other individual, may sponsor a committee.

(b) A person sponsors a committee if any of the following apply:

(1) The committee receives 80 percent or more of its contributions from the person or its members, officers, employees, or shareholders.

(2) The person collects contributions for the committee by use of payroll deductions or dues from its members, officers, or employees.

(3) The person alone or in combination with other organizations, provides all or nearly all of the administrative services for the committee.

(4) The person, alone or in combination with other organizations, sets the policies for soliciting contributions or making expenditures of committee funds.

(Emphasis added.)

You have stated that the individual who is funding the committee is not a partnership or a corporation and is funding the committee with distinctly "personal" funds. Therefore, the individual is not a sponsor of the committee.

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

Sincerely,

Sandra L. Silva  
Political Reform Consultant  
Technical Assistance Division