



California Fair Political Practices Commission

January 11, 1994

Perry Johnson
Oakland-Piedmont Republican Club
11001 Lochard Street
Oakland, CA 94605

Re: Your Request for
Reconsideration of Advice
Our File No. A-93-354a

Dear Mr. Johnson:

This is in response to your letter dated December 13, 1993, concerning the campaign filing obligations of the Oakland-Piedmont Republican Club (the "Club"). Your letter requests reconsideration of advice provided to you that the Club qualified as a recipient committee during 1992 and was required to file campaign disclosure reports. (Advice Letter No. A-93-354.)

I have reviewed the materials describing the Club's activities and have determined that the original advice provided to you is correct. The Club did, in fact, qualify as a recipient committee during 1992.

As we discussed, I have explored any possible avenues that would avoid the need for your group to file 1992/93 reports in exchange for a promise not to make any future political expenditures. Unfortunately, the law does not allow such discretion on our part in these situations. (Government Code § 84400, copy attached.) Therefore, you must file campaign disclosure reports for 1992 and 1993. If, as you indicated, the Club will not engage in any reportable activity in the future, you may terminate the Club's committee status as of the end of 1993.

We have enclosed all of the forms you will need to file and instructions for completing the forms. If you have any further questions, please contact Lynda Cassady at (916) 322-5662.

Sincerely,

A handwritten signature in cursive script that reads "Steven G. Churchwell".

Steven G. Churchwell
General Counsel