



California Fair Political Practices Commission

March 29, 1994

Lolli Benton
Administrator
Friends of Antonovich
143 South Glendale, Suite 101
Glendale, CA 91205

Re: Your Request For Informal Assistance
Our File No. I-94-77

Dear Ms. Benton:

You have requested advice concerning the campaign provisions of the Political Reform Act (the "Act").¹ Because your request seeks general guidance, we are treating your request as one for informal assistance.²

QUESTION

Other than as provided in Commission Regulation 18524(b), how can campaign funds be invested?

CONCLUSION

Campaign funds may be invested only in certificates of deposit, interest-bearing savings accounts, money market funds, or similar accounts at state and national banks, state and federal savings and loan associations, state credit unions and federal credit unions located in the state.

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.

2 Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

Lolli Benton
I-94-77
Page Two

ANALYSIS

A candidate's campaign funds must be held in one account established at a financial institution located in the state. (Section 85201.)

Regulation 18524(b) provides the only exception.

The candidate may transfer funds from the campaign bank account to certificates of deposit, interest-bearing savings accounts, money market accounts, or similar accounts which shall be established only for funds for the same elective office for which the campaign bank account was established. Prior to expenditure, the funds shall be redeposited in the candidate's campaign bank account.

(Emphasis added.)

Therefore, the investment of campaign funds is limited to the provisions outlined in Regulation 18524. (Bauer Advice Letter, No. I-91-181, copy enclosed.)

If you have any further questions regarding this matter, please feel free to contact me at (916) 322-5662.

Sincerely,



Linda Moureaux
Political Reform Consultant
Technical Assistance Division