



California Fair Political Practices Commission

July 13, 1994

Deana E. Anderson
J. Richard Eichman, CPA
1127 11th Street, Ste. 300
Sacramento, CA 95814

Re: Your Request for Informal
Assistance
Our File No. I-94-208

Dear Ms. Anderson:

You have requested advice concerning the campaign provisions of the Political Reform Act (the "Act").^{1/} Your letter states only a general question. Therefore, we consider it to be a request for informal assistance pursuant to Regulation 18329(c).^{2/}

QUESTION

Candidates and committees which make contributions to other candidates and committees often receive form letters thanking them for the contributions. Are these generic form letters required to be retained for recordkeeping purposes?

CONCLUSION

Form letters which contain no information necessary to complete or verify a candidate or committee's campaign statements are not required to be retained.

ANALYSIS

Section 84104 requires candidates and committees to maintain "such detailed accounts, records, bills and receipts that are necessary to prepare campaign statements and to comply with the

^{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).)

provisions of this chapter." Regulation 18401 specifies the types of documentation required to be retained for expenditures (including contributions) made of \$25 or more:

The original source documentation shall consist of cancelled checks, wire transfers, credit card charge slips, bills, receipts, invoices, statements, vouchers, and any other documents reflecting obligations incurred by the candidate, elected officer, campaign treasurer, or committee, and disbursements made from any checking or savings account, or any other campaign accounts, in any bank or other financial institution.

Regulation 18401(a)(4)(B).

Form letters which do not contain information necessary to complete or verify campaign disclosure statements are not required to be retained.

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

Sincerely,



Carla Wardlow
Division Chief
Technical Assistance Division