



California Fair Political Practices Commission

August 24, 1994

William A. Romaine
Behrens, Snyder, & Romaine
1025 North Demaree Street
Visalia, CA 93291-4117

Re: Your Request for Confirmation
of Telephone Advice
Our File No. A-94-261

Dear Mr. Romaine:

You have requested confirmation of telephone advice provided to you on behalf of Judge Glenda Doan concerning the campaign disclosure provisions of the Political Reform Act (the "Act").¹

Your letter accurately reflects the advice given to you. Judge Glenda Doan is soliciting contributions for the purpose of defending herself against charges brought by the Commission on Judicial Performance which could potentially result in her removal from office. Judge Doan was recently re-elected to office and the Committee to Reelect Judge Glenda K. Doan (CRJGD), which was formed to support that candidacy, has not been terminated.

The money she raises to defend herself against the charges before the Commission on Judicial Performance are contributions under the Act and must be deposited in the account of CRJGD and reported by CRJGD on its campaign statements. It is not necessary for CRJGD to change its name. If CRJGD uses "mass mailings" to solicit contributions for Judge Doan's defense, its name and address must be disclosed pursuant to the requirements of Section 84305 and Regulation 18435.

We are enclosing a copy of In re Montoya (1989) 12 FPPC Ops. 7, which discusses funds raised in connection with activities

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.

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related to an official's status as an officeholder and indicates that funds received under such circumstances are contributions.

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

Sincerely,

Steven G. Churchwell
General Counsel



By: Wayne P. Imberi
Political Reform Consultant