

RAVI MEHTA  
CHAIRMAN



FAIR POLITICAL PRACTICES COMMISSION

July 14, 1995

Peter Leigh Snell  
Public Affairs Support  
Services, Inc.  
401 Wythe Street, Suite 2-A  
Alexandria, Virginia 22314

Re: Your Request for Informal  
Assistance  
Our File No. I-95-218

Dear Mr. Snell:

This is in response to your letter requesting advice on behalf of the Travelers Group Inc. concerning the campaign disclosure provisions of the Political Reform Act (the "Act").<sup>1</sup> Since you are requesting general advice, we are treating your request as one for informal assistance.<sup>2</sup>

You are writing on behalf of Public Affairs Support Services ("PASS") which provides administrative services to the Travelers Group Inc. ("Travelers") in connection with its separate segregated fund the Travelers Group Inc. Political Action Committee ("TRAVPAC"). You indicated that TRAVPAC is organized pursuant to the Federal Election Campaign Act and was formed and exists primarily to support political campaigns at the Federal level of government. You additionally indicated that it is registered with and operated pursuant to the regulations promulgated and administered by the Federal Election Commission ("FEC").

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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. (Government Code Section 83114; 2 Cal. Code of Regs. Sections 18329(c)(3).)

Travelers has now decided to establish a non-Federal political action committee for the purpose of supporting California state and local candidates, ballot measures and/or committees to be called the Travelers Group Inc. Political Action Committee - California ("TRAVPAC-California").

Your letter outlines several operating and reporting procedures which will guide the operation of TRAVPAC-California. We have reviewed those procedures and they are in compliance with California law and regulations. In addition, you should be aware that under the Act, TRAVPAC may qualify as an intermediary because it is transferring contributions it receives into the account of TRAVPAC-California.

For disclosure purposes, if a transfer of \$100 or more from one contributor is made to TRAVPAC-California, it must indicate on its campaign statement (Form 450 or 420) that TRAVPAC is acting as an intermediary for that contributor.

We are enclosing for your reference Regulation 18421.1 which indicates when a contribution is "received". The regulation provides disclosure standards for committees that receive contributions by means of membership dues or payroll deductions.

Additionally, you should be aware that Travelers, the sponsoring entity of TRAVPAC-California, may incur separate filing obligations if it has sufficient qualifying activity on its own. However, Regulation 18419(c) provides that the sponsor will not qualify as a committee or incur any separate filing obligations so long as:

(1) The sponsor does not make or receive a sufficient amount of contributions or independent expenditures, other than those in support of its sponsored committee, to satisfy the thresholds set forth in Government Code Section 82013...

(2) The sponsored committee reports all contributions and expenditures made in support of the committee by the sponsor, its intermediate units, and the members of such entities...

(3) The sponsored committee reports as an intermediary the sponsor and, if required by paragraph (f) of this regulation, any intermediate unit, as an intermediary, if the sponsor or intermediate unit directly or indirectly provides the committee with \$100 or more in member contributions regardless of whether any member for whom the sponsor or intermediate unit acts contributed \$100 or more; and

(4) A responsible officer of the sponsor, as well as the treasurer of the sponsored committee, verifies

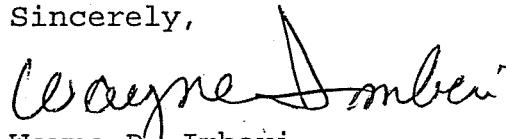
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the committee's campaign statement pursuant to  
Government Code Section 81004.

(Emphasis added.)

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

Sincerely,

A handwritten signature in cursive script that reads "Wayne P. Imberi". The signature is written in dark ink and is positioned above the typed name.

Wayne P. Imberi  
Political Reform Consultant