

May 6, 1997

John Ramirez
Nielsen, Merksamer, Parrinello,
Mueller & Naylor,
591 Redwood Highway
Mill Valley, California 94941

**Re: Your Request for Advice
Our File No. I-97-146**

Dear Mr. Ramirez:

This letter is in response to your request for advice regarding provisions of the Political Reform Act (the "Act").¹ Since your advice request does not name a specific committee, we are treating this as a request for informal assistance.²

QUESTION

Is a committee that only participates in San Francisco elections considered a "city" or "county" committee?

CONCLUSION

A committee that only participates in San Francisco elections is considered a "county" committee.

¹ Government Code sections 81000 - 91014. Commission regulations appear at title 2, sections 18100 - 18995, 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, subd. (c)(3), (c)(4).)

ANALYSIS

The terms "City" and "County" are defined in the Act. City means a general law or a chartered city. (Section 82008.) County includes a city and county. (Section 82017.) Since San Francisco is not a general law or chartered city, but rather a consolidated city and county municipality, committees formed to support or oppose only candidates and/or measures being voted on in San Francisco are considered county committees. (Section 82027.5; see *Moll Advice Letter*, No. A-97-080.)

Committees formed pursuant to subdivision (b) or (c) of Section 82013 (commonly referred to as major donor and independent expenditure committees, respectively) are not required to file regular preelection statements. (Section 84200.5(d).)³

If you have any other questions regarding this matter, please contact me at (916) 322-5660.

Sincerely,

Steven G. Churchwell
General Counsel

By: Lynda Cassady
Assistant Division Chief
Technical Assistance Division

³However, county major donor and independent expenditure committees must file supplemental independent expenditure reports on the City and County's preelection filing schedule if they make independent expenditures totaling \$500 or more to support or oppose a single candidate or measure. (Section 84203.5.)