



## FAIR POLITICAL PRACTICES COMMISSION

February 6, 1998

David Richards  
CSP-Solano  
12-129U  
PO Box 4000  
Vacaville, CA 95696

**Re: Your Request for Advice  
Our File No. A-98-011**

Dear Mr. Richards:

This letter is a response to your request for advice regarding the campaign provisions of the Political Reform Act (the "Act").<sup>1</sup>

### FACTS & QUESTION

You are planning to form a political action committee which is supportive of prisoners' rights. In part, this organization proposes to register voters, provide information to members regarding incumbent elected officials' voting records, and make contributions to candidates supportive of your issue. What registration or reporting requirements will you incur when this committee is formed?

### ANSWER

Within ten days of raising or spending \$1,000 in a calendar year for political purposes, you will be required to file a statement of organization (enclosed). In addition, at least semi-annually, you will be required to report the financial activity of the committee on reporting Forms 420 or 450 (also enclosed).

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<sup>1</sup> Government Code sections 81000 - 91014. Commission regulations appear at title 2, sections 18109 - 18995, of the California Code of Regulations.

### ANALYSIS

Section 82013 defines a "committee," in part, as:

"Any person or combination of persons who directly or indirectly ... receives contributions totaling one thousand dollars (\$1,000) or more in a calendar year."

A contribution is defined by Section 82015, in part, as:

"A payment, a forgiveness of a loan, a payment of a loan by a third party, or an enforceable promise to make a payment except to the extent that full and adequate consideration is received unless it is clear from the surrounding circumstances that it is not made for political purposes."

All committees meeting the above criteria are required to file a statement of organization within 10 days of qualifying as a committee. (Section 84103.) In addition, these committees must file at least semi-annually. (Section 84200.) Please see the enclosed Information Manual for additional reporting obligations.

If you have any more questions, please feel free to contact me at (916) 322-5660.

Sincerely,

Steven G. Churchwell  
General Counsel



By: Kevin S. Moen  
Political Reform Consultant

Enclosures