



FAIR POLITICAL PRACTICES COMMISSION

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September 30, 1998

Diane M. Fishburn
Olson, Hagel, Leidigh, Waters & Fishburn
Plaza Towers
555 Capitol Mall, Suite 1425
Sacramento, California 95814-4602

**Re: Your Request for Advice
Our File No. I-98-215**

Dear Ms. Fishburn:

This is in response to your request for informal assistance regarding the campaign provisions of the Political Reform Act ("Act").¹ Because you are requesting advice regarding a general application of the law, your letter dated August 18, 1998, is considered a request for informal assistance.²

You ask whether the CA Friends Latino PAC, which is jointly controlled by three members of the Legislature, is required to file additional disclosure statements on behalf of the controlling officeholders. The answer is no. As long as each of the controlling officeholders is disclosing the jointly controlled committee on Part II of the cover page of his or her separately controlled committee's campaign statements, Form 490, and the jointly controlled committees are disclosing the campaign committees of each of the controlling officeholders on Part II of their cover pages, Form 490, the filing requirements of the Act are satisfied. (Gov. Code Sections 84209, 84211.)

¹ Government Code sections 81000 - 91014. Commission regulations appear at title 2, sections 18109 - 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).) We note that you are requesting confirmation of telephone advice. While informal assistance may be requested or rendered orally or in writing, assistance will only be rendered concerning prospective conduct. (Regulation 18329, subd. (c)(4).) Presumably, your request for written advice involves only prospective conduct.

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

Sincerely,

Steven G. Churchwell
General Counsel

A handwritten signature in cursive script that reads "Mary Ann Kvasager". The signature is written in black ink and is positioned above the typed name.

By: Mary Ann Kvasager
Political Reform Consultant