



FAIR POLITICAL PRACTICES COMMISSION

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April 22, 2008

Judith A. Robbins  
City Attorney's Office  
City of Pleasant Hill  
100 Gregory Lane,  
Pleasant Hill, CA 94523

Re: Your Request for General Information  
**Our File No. G-08-060**

Dear Ms. Robbins:

This letter is in response to your request for informal assistance regarding the proposed amendment to the City of Pleasant Hill's campaign finance ordinance. You have asked us to review the proposed amendment for conformity with the requirements of the Political Reform Act.<sup>1</sup> Enclosed is a copy of the proposed amendment marked to show changes we are suggesting.

The most important change we suggest is that you not change the definition of "committee" to exclude ballot measure committees. By first stating that your definition of "committee" includes all the definitions of the various kinds of committees in the Act, and then inserting a proviso that it does not include ballot measure committees, is just too confusing. Instead we are suggesting that the definition of "committee" parallel the definition in the Act. To make clear that the contribution limits do not apply to ballot measure committees, we suggest that you define "ballot committee" along the lines of the Act's definition of "ballot measure committee" and then carve it out in the paragraph imposing contribution limits.

Other changes include deleting "committees" when referring to contributors because they are already included in the definition of "person." You also need to include a definition for "political committee" because you use that term in Section 2.55.040 and it is not a term defined in the Act. We suggest adding "political" to "committee" in places we felt it is necessary to make it clear that other committees remain subject to the Act's reporting provisions. We propose deleting references to "broad-based political committee" because your definition of "political committee" appears to bring in all broad-based committees. Finally, we propose changing Section 2.55.070E to clarify that

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<sup>1</sup> The Political Reform Act is contained in Government Code sections 81000 through 91014.

the new requirement for maintaining lists of statements and reports does not replace the record retention requirements of the Act.

If you have questions on this matter, please contact me at (916) 322-5783.

Sincerely,

Scott Hallabrin  
General Counsel



By: Valentina Joyce  
Counsel, Legal Division

VJ:jgl

Enclosure