



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

December 4, 2013

Lysa Ray, President
Lysa Ray Campaign Services
603 E. Alton Avenue, Suite H
Santa Ana, CA 92705

Re: Your Request for Informal Assistance
Our File No. I-13-148

Dear Ms. Ray:

This letter responds to your request for advice on behalf of the committee "Friends of Bob Roper for County Supervisor 2012" regarding campaign finance provisions of the Political Reform Act (the "Act").¹ Please note that our advice is based solely on the Act. We therefore offer no opinion on the application, if any, of additional local campaign finance rules. We advise you to check with your local jurisdiction regarding the applicability of other requirements and restrictions.²

You wish to re-activate the committee, "Friends of Bob Roper for County Supervisor 2012 #1343307 in order to repay campaign debt. This is a county committee therefore the requirements under Regulation 18404.1 do not apply. Regulation 18404.1 only applies to committees formed for state offices.

Consequently, if local ordinances permit you to reopen your committee, you would merely need to file an amended Form 410 (Statement of Organization) with the Secretary of State's office.

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

² For instance, we note that Ventura County Ordinance Code Section 1280 applies restrictions on when contributions may be collected. It states that "[n]either a county candidate, elected county officials, nor any committee controlled by the candidate may receive any contributions more than one year before and 90 days after an election on which the candidate is on the ballot except for contributions of the candidate's own money to the candidate's controlled committee account." We suggest that you contact your local elections office to determine if this or any other local provisions apply to your situation.

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

Sincerely,

Zackery P. Morazzini
General Counsel

A handwritten signature in black ink that reads "Emelyn Rodriguez". The signature is written in a cursive style with a large, looping "E" and "R".

By: Emelyn Rodriguez
Counsel, Legal Division

ER:jgl