



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811
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April 21, 2023

Charlene D. Cruz
Section Head, Campaign Finance Section
Registrar-Recorder/County Clerk
12400 Imperial Hwy. Room 2003
Norwalk, CA 90650

Re: Your Request for Advice
Our File No. A-23-074

Dear Ms. Cruz:

This letter responds to your request for advice on behalf of Los Angeles County regarding the campaign provisions of the Political Reform Act (the “Act”).¹

QUESTION

May the candidates and committees involved in the County’s July 25, 2023 election combine the semi-annual statement with the second pre-election statement due on July 13, 2023?

CONCLUSION

In connection with the July 25, 2023 election, candidates and their committees may use a filing schedule that combines the semi-annual campaign statement with the second pre-election statement. The combined statement will be due on July 13, 2023 covering the period June 11, 2023, through July 8, 2023.

ANALYSIS

During an election, candidates and committees involved in the election are required to file two pre-election campaign statements disclosing contributions received and expenditures made in connection with that election. These pre-election campaign statements are generally filed 40 days before the election and again 12 days before the election. (Section 84200.8.) Semi-annual statements are filed January 31 and July 31, respectively. (Section 84200.)

The County of Los Angeles is holding an election on July 25, 2023. The first pre-election statement is due on June 15, 2023, and covers the reporting period of January 1 through June 10.

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 18104 through 18998 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.

The first semi-annual report for 2023, covering the period June 11 through June 30, is due on July 31, 2023. The second pre-election statement filed in connection with this election would then cover the period of July 1 through July 8, and would be due on July 13, 2023, before the deadline for the semi-annual statement.

There is a mechanism in the Act that permits the combining of statements when an overlapping reporting period occurs, or the filing of the semi-annual statement would be an additional, unnecessary filing to the two pre-election statements. (Section 84205.) It appears that combining the second pre-election statement with the semi-annual statement would be appropriate for the County's July 25, 2023 election.

Accordingly, candidates and their controlled committees on the July 25, 2023 ballot may combine the semi-annual statement with the second pre-election statement. The date for filing this combined statement is July 13, 2023, the date the second pre-election statement is due. A campaign statement filing schedule that outlines the due dates for filing statements is enclosed for your convenience.

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

Sincerely,

Dave Bainbridge
General Counsel

A handwritten signature in blue ink, appearing to read "EM Boyd".

By: Erika M. Boyd
Senior Counsel, Legal Division

EMB:aja