



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811  
(916) 322-5660 • Fax (916) 322-0886

May 24, 2023

Jazmin Flores  
Campaign Services  
5600 Overland Avenue, Ste. 100  
San Diego, CA 92123

Re: Your Request for Advice  
**Our File No. A-23-093**

Dear Ms. Flores:

This letter responds to your request for advice on behalf of San Diego County regarding the campaign provisions of the Political Reform Act (the “Act”).<sup>1</sup>

### QUESTION

May the candidates and committees involved in the County’s August 15, 2023 election combine the semi-annual statement with the first pre-election statement due on July 6, 2023?

### CONCLUSION

In connection with the August 15, 2023 election, candidates and committees may use a filing schedule that combines the semi-annual campaign statement with the first pre-election statement. The combined statement will be due on July 6, 2023 covering the period from the day after the closing date of the last statement filed, through July 1, 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 San Diego is holding an election on August 15, 2023. The first semi-annual report for 2023, covering the period from the day after the closing date of the last statement filed through June 30, is due on July 31, 2023. The first pre-election statement filed in connection with

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<sup>1</sup> 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.

this election, however, covers the period of July 1 through July 1 (a one-day report), and is due on July 6, 2023.

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 first pre-election statement with the semi-annual statement would be appropriate for the County's August 15, 2023, election.

Accordingly, in connection with the August 15, 2023 election, candidates and committees may combine the semi-annual statement with the first pre-election statement. The date for filing this combined statement is July 6, 2023, the date the first 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