



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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June 6, 2023

Genesis Medellin Cabaccang
Monterey County Elections
Program Manager – Candidate Services
1441 Schilling Pl - North Bldg.
Salinas, CA 93901

Re: Your Request for Advice
Our File No. A-23-098

Dear Ms. Medellin Cabaccang:

This letter is in response to your request on behalf of Monterey County regarding the campaign provisions of the Political Reform Act (the “Act”).¹

QUESTION

May the committees involved in the County’s August 29, 2023 election combine the semi-annual statement with the first pre-election statement due on July 20, 2023?

CONCLUSION

In connection with an August 29, 2023 election, 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 20, 2023, covering the period from the day after the closing date of the last statement filed, through July 15, 2023.

ANALYSIS

During an election, 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.)

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 County of Monterey is holding an election on August 29, 2023. The first semi-annual statement 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 this election would then cover the period of July 1 through July 15, and would be due on July 20, 2023, before the deadline for the semi-annual statement. The second pre-election statement is due on August 17, 2023, and covers the reporting period of July 16 through August 12.

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 29, 2023 election.

Accordingly, committees supporting or opposing ballot measures appearing on the August 29, 2023, ballot may combine the semi-annual statement with the first pre-election statement. The statement will cover the period from the day after the closing date of the last statement filed, through July 15, and be due on July 20, 2023. 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



By: Erika M. Boyd
Senior Counsel, Legal Division

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