

State of California



Fair Political Practices Commission

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January 11, 1985

Brenda Haskins
California Dental Association
818 K Street
Sacramento, CA 95814

Re: Our File No. A-85-003

Dear Brenda:

This is to confirm the advice I provided you during our meeting on January 3, 1985, and on the telephone January 7, 1985, regarding the campaign disclosure provisions of the Political Reform Act (Government Code Sections 81000-91014).

The California Dental Association sponsors two political action committees--one for federal activities and one for California activities. Both PACs are registered in California and file periodic campaign disclosure reports. (The Federal PAC is required to file reports under the Political Reform Act by virtue of its contributions to the California PAC.)

During 1984, the federal PAC (I.D. No. 820034) received letters from the Office of the Secretary of State requesting amendments to its 1984 campaign disclosure statements. The letters requested that the PAC amend information regarding expenditures reported on the PAC's statements which were not made in connection with California state or local candidates or committees, such as payments for income taxes and contributions to candidates for federal office.

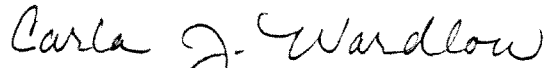
I advised you that under the Commission's regulations, the federal PAC is required to report only contributions received and expenditures made in connection with California state and local candidates and committees and, therefore, the PAC should amend its 1984 disclosure statements to delete all other activities. For example, the PAC's disclosure statement (Form 450) filed for the period 7/1/84-9/17/84 contains only one reportable transaction: the \$80,000 contribution to the California PAC. All other expenditures should be deleted. These amendments will satisfy the requests for amendments sent by the Secretary of State.

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In addition, I advised you that the federal PAC should report no cash on hand when completing the summary portion of the campaign disclosure statements. Because the PAC is required to report only those amounts it receives and spends in connection with California state and local candidates and committees, it essentially holds no cash on hand under California law. Therefore, the PAC will report a beginning cash on hand of zero, receipts and expenditures in the amount of its reportable California activities, and an ending cash on hand of zero.

I hope this information is helpful. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Carla J. Wardlow".

Carla J. Wardlow
Political Reform Consultant

cc: Marian Ash, Chief
Political Reform Division
Office of the Secretary of State