



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811  
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March 9, 2023

Leticia Flores  
Elections Coordinator  
Riverside County Registrar of Voters  
2724 Gateway Drive  
Riverside, CA 92507

Re: Your Request for Advice  
**Our File No. A-23-043**

Dear Ms. Flores:

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

### QUESTION

May the candidates and their 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, candidates and their 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 January 1, 2023, through July 15, 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.)

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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.

The County of Riverside is holding an election on August 29, 2023. The first semi-annual report for 2023, covering the period January 1 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, candidates and their controlled committees 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 of January 1 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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