



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

March 25, 2025

Giovanni Villegas-Cortez
Election Specialist II
Merced County Registrar of Voters
2222 M Street
Merced, CA 95340

Also sent via email at: Giovanni.Villegas-Cortez@countyofmerced.com

Re: Your Request for Advice
Our File No. A-25-039

Dear Giovanni Villegas-Cortez:

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

QUESTION

May the committees involved in the County’s August 26, 2025, election combine the semi-annual statement with the first pre-election statement due July 17, 2025?

CONCLUSION

In connection with the August 26, 2025, 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 17, 2025, covering the period January 1, 2025, through July 12, 2025.

ANALYSIS

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

The County of Merced is holding a special election on August 26, 2025. The first semi-annual report for 2025, covering the period January 1 through June 30, is due on July 31, 2025. The first pre-election statement filed in connection with this election would then cover the period of July

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.

1 through July 12. It would be due on July 17, 2025, before the deadline for the semi-annual statement. The second pre-election statement is due on August 14, 2025, and covers the reporting period of July 13 through August 9.

There is a mechanism in the Act that permits combining 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.) Combining the first pre-election statement with the semi-annual statement would be appropriate for the County's August 26, 2025, election.

Accordingly, candidates and their controlled committees appearing on the August 26, 2025, ballot may combine the semi-annual statement with the first pre-election statement. The statement will cover the period of January 1 through July 12 and be due on July 17, 2025. 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 black ink, appearing to read 'T. Lewis'.

By: Toren Lewis
Commission Counsel, Legal Division

TL:aja