



November Election Could Mean Extra Reports for California Major Donors

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Individuals and entities who make contributions and independent expenditures in relation to California's November 2, 2010 statewide General Election may be subject to special campaign filing requirements. Starting Sunday, October 17, 2010, major donors will have to report most contributions of \$1,000 or more within 24 hours to state campaign filing offices, including those made independent (not made at the behest) of the affected candidate or committee.

A California Major Donor is a person or entity who contributes \$10,000 or more to California state or local candidates, PACs, ballot measures or political parties in any given calendar year. Independent expenditures are payments made in connection with a communication (e.g., a billboard, advertisement, mailing) that expressly advocates the nomination, election, or defeat of a clearly identified candidate or the qualification, passage, or defeat of a clearly identified measure.

Covered are all contributions (monetary or non-monetary) that support or oppose any state or local candidate or measure appearing on the November 2 ballot, or any county or state political party committee, including those that bring a donor's total annual contributions to \$10,000. The 24-hour clock starts ticking with the date on the check or the date the check is delivered, whichever is later. The same reporting requirement applies to individuals and entities making "independent expenditures" of \$1,000 or more in this period.

The FPPC does not extend filing deadlines. Failure to file campaign disclosure statements on time may lead to late filing penalties of \$10 for each day the statement is late and failure to file a statement may result in additional penalties.

Nossaman is available to assist individuals and entities participating in California's November 2 election fulfill all associated disclosure requirements. For more information, please contact Political Reporting and

Compliance Consultant Karen Roberts at 916.442.8888 or kroberts@nossaman.com.

Fred Dombo also assists clients in all aspects of compliance with federal and state ethics law and government ethics. Fred can be reached at 202.887.1485 or fdombo@nossaman.com.