

From: [Campaign Guidance](#)
To: jsutton@campaignlawyers.com
Cc: [Campaign Guidance](#)
Subject: RE: 24-hour reports
Date: Friday, November 15, 2019 2:18:31 PM

Mr. Sutton,

The Municipal Code defers to the Political Reform Act for the purpose of 24-hour reporting for independent committees receiving contributions and making expenditures in the City. Please refer to Section 12.06.910.D, which states:

D. Each independent committee that makes independent expenditures in a City election must file with the City Clerk campaign disclosure statements in the form and at the times required by the Political Reform Act. When listing contributions or expenditures on the form required by the Political Reform Act, each independent committee must itemize all contributions accepted and expenditures made during the campaign contribution collection periods specified in this Chapter, including all amounts less than one hundred dollars (\$100.00).

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From: James Sutton <jsutton@campaignlawyers.com>
Sent: Monday, November 11, 2019 2:54 PM
To: Campaign Guidance <SJElections@sanjoseca.gov>
Subject: 24-hour reports

[External Email]

What is the threshold for San Jose independent committees for filing 24-hour reports, both for contributions which the independent committee receives during the 90 days before the election (FPPC Form 497), and for independent expenditures which it makes on behalf of City candidates during this 90-day period (Form 496)? The reporting threshold under state law is \$1,000, but I believe that San Jose may have adopted a lower threshold.

Tx.

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