

**NOTICE OF INTENT TO ADOPT AN ADVISORY OPINION OF THE
GEORGIA GOVERNMENT TRANSPARENCY AND
CAMPAIGN FINANCE COMMISSION**

TO ALL INTERESTED PERSONS AND PARTIES:

Notice is hereby given that pursuant to the authority set forth below, the Georgia Government Transparency and Campaign Finance Commission (hereinafter "Commission") proposes to adopt:

Advisory Opinion No. 2017-01

This notice, together with an exact copy of the proposed advisory opinion is being mailed to all persons who have requested, in writing, that they be placed on a mailing list. A copy of this notice, an exact copy of the advisory opinion may be reviewed during normal business hours of 8:30 a.m. to 4:30 p.m. Monday through Friday, except official State holidays, at the Georgia Government Transparency and Campaign Finance Commission, 200 Piedmont Avenue SE, Suite 1402 - West Tower, Atlanta, Georgia 30334. These documents will be available for review on the Georgia Government Transparency and Campaign Finance Commission website (www.ethics.ga.gov). Copies may be requested by contacting the Commission at 404-463-1980.

A public hearing is scheduled to begin at 10:00 AM on June 14, 2017 in Room 606 at the Coverdell Legislative Office Building, 18 Capitol Square SW, Atlanta, GA 30334 to provide the public an opportunity to comment upon and provide input into the proposed advisory opinion. At the public hearing anyone may present data, make a statement, comment, or offer a viewpoint or argument whether orally or in writing. Lengthy statements or statements of a considerable technical or economic nature, as well as previously recorded messages, must be submitted for the official record. Oral statements should be concise and will be limited to five (5) minutes per person. Written comments are welcome. Such written comments must be legible and signed, and should contain contact information from the maker (address, telephone and/or facsimile number, etc.). To ensure their consideration, written comments must be received on or before June 13, 2017. Written Comments should be addressed to Nancy Sandberg, Legal Administrative Assistant, Georgia Government Transparency and Campaign Finance Commission, 200 Piedmont Avenue SE, Suite 1402 – West Tower, Atlanta, Georgia 30334. Fax: 404-463-1988.

The proposed advisory opinion will be considered for adoption by the Commission at its meeting scheduled to begin at 10:00 a.m. on June 14, 2017, at the Coverdell Legislative Office Building, Room 606, 18 Capitol Square SW, Atlanta, GA 30334.

The Georgia Government Transparency and Campaign Finance Commission has the authority to adopt this advisory opinion pursuant to authority contained in O.C.G.A. § 21-5-6(b)(13).

This 12 day of May, 2017.


Stefan Ritter, Executive Secretary



GEORGIA GOVERNMENT TRANSPARENCY & CAMPAIGN FINANCE COMMISSION

Advisory Opinion No. 2017-01

In response to numerous informal requests to Commission staff, the Georgia Government Transparency and Campaign Finance Commission advises that the Campaign Finance Act requires elected public officers and candidates for public office to maintain their accounting records for an “election cycle” rather than a fiscal or calendar year accounting period. Under the Act an “election cycle” ends on the day of an election (including a run-off, if any), and a new “election cycle” begins the following day. Thus, elected public officers and candidates for public office must reset their respective campaign contribution and campaign expenditure balances as of the date an “election cycle” begins, including resetting their “total contributions previously reported,” “total expenditures made and reported prior to this reporting period,” and “net balance on hand,” and these reset balances are reported on the first report due after the “election cycle” begins (usually the December 31 CCDR).

Questions Presented

- (1) What accounting period does the Campaign Finance Act or Commission mandate for use by public officers and candidates for public office as it relates to the filing of campaign contribution disclosure reports (hereinafter “CCDR”)?
- (2) When must public officers and candidates for public office reset their campaign account balances on their CCDRs?
- (3) What balances are reset on a public officer’s and candidate’s CCDR?

Factual Background

After receiving numerous inquiries from state, county and municipal public officers and candidates for public office, Commission staff seek guidance as to what accounting periods and principals are to be used by public officers and candidates for public office on CCDRs filed with the Commission and local filing officer. Commission staff also seek guidance as to what balances elected public officers¹ and candidates for public office must reset to zero or another value at the conclusion of a designated accounting period.

¹ A public officer is defined as every constitutional officer, every elected state official, the executive head of every state department or agency, whether elected or appointed, each member of the General Assembly, the executive

Discussion

The Campaign Finance Act, O.C.G.A. § 21-5-1, *et. seq.*, requires every elected public officer and candidate for public office to file periodic campaign finance disclosures and personal financial statements with the Commission in the form of campaign contribution disclosure reports and personal financial disclosure statements respectively. *See* O.C.G.A. §§ 21-5-2, 21-5-34(a)(1)(A), and 21-5-50(a)(1). While state level public officers and candidates for public office are required to electronically file their periodic campaign finance and personal financial disclosures directly with the Commission, local public officers and candidates for local public office are required to file their disclosures with a local government agency which then serves as the officer's/candidate's proxy by transmitting those disclosures to the Commission. O.C.G.A. §§ 21-5-34(a)(1)(B)(3)-(4) and 21-5-50(a)(3)-(3.1).

To further the goal of promoting transparency in campaign finance disclosures the Act imposes, in addition to a regular filing regimen, a method of accounting that is substantially different from the generally accepted accounting principles ("GAAP") utilized by private and government entities.² A major difference between GAAP and accounting principles under the CFA is that public officers and candidates for public office must report their respective cumulative totals for campaign contributions and campaign expenditures based on an entire "election cycle" (which can last several years) as opposed to a calendar or fiscal year. *See, e.g.*, O.C.G.A. § 21-5-34(b)(1)(D) ("Total contributions received and total expenditures shall be reported for an election cycle ...").

An "election cycle" is statutorily defined as "the period from the day following the date of an election or appointment of a person to elective public office through and including the date of the next such election of a person to the same public office and shall be construed and applied separately for each elective office." O.C.G.A. § 21-5-3(10). The defined period for an "election cycle" does not align in most (if not all) instances with either a calendar year or a fiscal year.

Thus, based on the statutory definition of "election cycle" and the requirement that reporting be done on the basis of the "election cycle," an elected public officer's or candidate's campaign should reset its accounting balances on the first report following the general election for the office they are seeking (or the general election that occurs for the office that they sought, irrespective of said individual's qualification for office or advancement from the primary election to general election for said office). If the election leads to a run-off, the election cycle does not end until the run-off is held since the run-off is a continuation of the general election. O.C.G.A. § 21-5-3(10).

director of each state board, commission, council, or authority and the members thereof, every elected county official and every elected member of a local board of education, every elected municipal official, the members of the State Transportation Board and any public officer or employee who has any discretionary authority over, or is a member of a public body which has discretionary authority over, the selection of a vendor to supply any goods or services to an state agency. O.C.G.A. §§ 21-5-3(22)(A)-(G) and 21-5-70(6).

² Generally accepted accounting principles are determined by the Financial Accounting Standards Board ("FASB") and the Government Accounting Standards Board ("GASB") for private and government entities respectively. *See* generally, Financial Accounting Foundation, *Generally Accepted Accounting Principles*, (May 1, 2017, 10:30 AM), <https://www.financialaccountingfoundation.org/gaap>.

In the instance where an elected public officer or candidate for public office will not be running again for the office and has begun winding down their campaign after the filing of their final report in an election year (e.g., the December 31 CCDR), so as to dispose of their remaining campaign contributions and terminate their campaign, the campaign should not reset its balances and should continue reporting its cumulative campaign contributions and campaign expenditures until the “net balance on hand” reaches zero. O.C.G.A. §§ 21-5-3(10) and 21-5-34(b)(1)(D).

After the conclusion of an election cycle, all public officers and candidates for public office should reset the following balances on their next CCDR (usually the December 31 CCDR). O.C.G.A. §§ 21-5-3(10) and 21-5-34(b)(1)(D). Pursuant to Georgia’s CFA, the following balances must be reset as detailed below at the close of an election cycle:

- 1) The “Total contributions previously reported” (Line 2 of the standard CCDR) is the “Net Balance on Hand” (Line 15 of the standard CCDR) from the preceding Report. O.C.G.A. § 21-5-34(b)(1)(D)(i), See also, O.C.G.A. § 21-5-34(b)(1)(D)(v) and Exhibits A and B.
- 2) The “Total expenditures made and reported prior to this reporting period” (Line 8 of the standard CCDR) is reset to zero. O.C.G.A. § 21-5-34(b)(1)(D)(iii), See also, Exhibits A and B.
- 3) The “Net Balance on Hand” (Line 15 of the standard CCDR) should reflect the sum total of Lines 6 and 12 of the current CCDR. O.C.G.A. § 21-5-34(b)(1)(D)(i)-(v), See also, Exhibits A and B.

Conclusion

For the reasons described above, the Commission advises that the Campaign Finance Act requires elected public officers and candidates for public office to maintain their accounting records for an “election cycle” rather than a fiscal or calendar year accounting period. Under the Act an “election cycle” ends on the day of an election (including a run-off, if any), and a new “election cycle” begins the following day. Thus, elected public officers and candidates for public office must reset their respective campaign contribution and campaign expenditure balances as of the date an “election cycle” begins, including resetting their “total contributions previously reported,” “total expenditures made and reported prior to this reporting period,” and “net balance on hand,” and these reset balances are reported on the first report due after the “election cycle” begins (usually the December 31 CCDR).

Advisory Opinion 2017-01 is hereby adopted by the Commission in conformity with O.C.G.A. § 21-5-6(13) on **June 14, 2017**.

Chair of the Commission

AO 2017-01 prepared by Stefan Ritter and Robert S. Lane.
May 12, 2017.

State of Georgia
Campaign Contribution Disclosure Report

1. Report Type**Original Report****2. Filing is being made on behalf of:**
Candidate or Public OfficialC2016000191 -
*CFC Compliance Robert
Other State Office**Filing Office Use
Only***E-Filed on*
5/5/17 2:11 pm**Use Earlier of Post
Mark or Hand
Delivered Date****3. Identifying and Contact Information**(1) *CFC Compliance Robert*Full Name of Candidate or Non-Candidate Campaign Committee*(2) 05/05/2017*Today's Date*(3) 200 Piedmont Ave Atlanta, GA 30334*Mailing Address*(4) Telephone number is unavailable.*Contact Phone Number (We will understand the release of this information as permission to call your office if necessary.)*(5) If a Candidate or Public Official, is there a campaign committee (one or more persons) to make campaign transactions, keep the financial records of the campaign, or file the reports? **NO** (6) If so, is the Committee registered with the State Ethics Commission? **NO**

(7)

*Name of Chairperson and / or Treasurer of Committee***4. Period for which you are Reporting**

My Non Election Year	My Election Year	Run-Offs <small>(Report Require Only if you are in a Run Off Election)</small>	Special Elections <small>(Report Require Only if you are in a Special Election)</small>
<input type="checkbox"/> January 31, 2016 <input type="checkbox"/> June 30, 2016	<input type="checkbox"/> January 31, 2016 <input type="checkbox"/> March 31, 2016 <input type="checkbox"/> June 30, 2016 <input type="checkbox"/> September 30, 2016 <input checked="" type="checkbox"/> October 25, 2016 <input type="checkbox"/> December 31, 2016	<input type="checkbox"/> 6 days before Primary Run-Off, 2016 <input type="checkbox"/> 6 days before General Run-Off, 2016 <input type="checkbox"/> 6 days before Special Primary Run-Off, 2016 <input type="checkbox"/> 6 days before Special Run-Off, 2016	<input type="checkbox"/> 15 days before Special Primary, 2016 <input type="checkbox"/> 15 days before Special, 2016 <input type="checkbox"/> Dec. 31, 2016
Supplemental Reporting <input type="checkbox"/> June 30, 2016 <input type="checkbox"/> December 31, 2016 <small>*Persons leaving office with excess funds until such funds are expended as provided in the Act *Unsuccessful candidates with excess funds, or who receive contributions to retire debt incurred, until such funds are expended, or such unpaid debts are satisfied</small>			

The electronic filing of this document constitutes an affirmation that the statement is true, complete, and correct. As per modifications of the Ethics in Government Act, filing a separate notarized affidavit is no longer required. See O.C.G.A. §§ 21-5-34.1(e) and 21-5-50(e).

State of Georgia
Campaign Contribution Disclosure Report
Summary Report

CONTRIBUTIONS RECEIVED

1	I Have: The following contributions, including Common Source, to report:	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
2	Total contributions previously reported.	\$0.00	\$10,000.00
3	Total amount of all itemized contributions received in this reporting period which are listed on the "Itemized Contributions" page.	\$0.00	\$5,000.00
3a	All loans received this reporting period.		\$10,000.00
3b	Interest earned on campaign account this reporting period.		\$0.00
3c	Total amount of investments sold this reporting period.		\$0.00
3d	Total amount of cash dividends and interest paid out this reporting period.		\$0.00
4	Total amount of all separate contributions of \$100.00 or less received in this reporting period and not listed on the "Itemized Contributions" page. "Common Source" contributions must be aggregated on the "Itemized Contributions"	\$0.00	\$0.00
5	Total contributions reported this reporting period. (Line 3 + 3a + 3b + 3c + 3d + 4)	\$0.00	\$15,000.00
6	Total contributions to date. (Line 2 + 5)	\$0.00	\$25,000.00

EXPENDITURES MADE

7	I Have: The following expenditures to report:	<u>In-Kind Estimated Value</u>	<u>Cash Amount</u>
8	Total expenditures made and reported prior to this reporting period.	\$0.00	\$9,000.00
9	Total amount of all itemized expenditures made in this reporting period which are listed on the "Itemized Expenditures" page.	\$0.00	\$2,500.00
10	Total amount of all separate expenditures of \$100.00 or less each that were made in this reporting period and not listed on the "Itemized Expenditures" page.	\$0.00	\$0.00
11	Total expenditures reported this reporting period. (Line 9 + 10)	\$0.00	\$2,500.00
12	Total expenditures to date. (Line 8 + 11)	\$0.00	\$11,500.00

INVESTMENTS

13	Amount of investments at the beginning of this reporting period.		\$0.00
14	Total amount of investments at the close of this reporting period.		\$0.00
15	Net Balance On Hand. (Line 6 - 12 + 14)		\$13,500.00

State of Georgia
Campaign Contribution Disclosure Report
Outstanding Indebtedness

General 2016 Indebtedness		<u>Amount</u>
1	Outstanding indebtedness at the beginning of this reporting period.	\$0.00
2	Loans received this reporting period.	\$10,000.00
3	Deferred payments of expenses this reporting period.	\$0.00
4	Payments made on loans this reporting period.	\$0.00
5	Credits received on loans/deferred payments this reporting period.	\$0.00
6	Payments this period on previously deferred expenses.	\$0.00
7	Total indebtedness at the close of this reporting period. (line 1 + 2 + 3 - 4 - 5 - 6)	\$10,000.00

State of Georgia
Campaign Contribution Disclosure Report
Itemized Contributions

Must list contributions received by a single contributor for which the aggregate total is more than \$100.00

Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
Atlanta PAC 1234 DeKalb Ave. Atlanta, GEORGIA 30334	10/02/2016 Monetary		2016 General	\$2,500.00	\$0.00
Doe, John 1234 Atlanta Ave. Atlanta, Georgia 30334	10/01/2016 Monetary	a. Attorney b. State of Georgia	2016 General	\$2,500.00	\$0.00

FILER ID: C2016000191

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Contributions Received

In-Kind Total for this period:	\$0.00
Cash Contributions Total for this period:	\$5,000.00

State of Georgia
Campaign Contribution Disclosure Report
Loan Reporting

Name of Lender Mailing Address	Date of Loan Amount of Loan Election Cycle	Person(s) responsible for repayment of loan Mailing Address	Occupation & Place of Employment Fiduciary Relationship
SunTrust Bank 1234 Cobb Ave. Atlanta,GA 30334	10/3/2016 \$10,000.00 General 2016		
		Robert CFC Compliance 200 Piedmont Ave. NE Suite 1402 - West Tower Atlanta,GA 30334	Attorney CFC Candidate

State of Georgia
Campaign Contribution Disclosure Report
Itemized Expenditures

Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00

List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Signs in a Hurry 789 Somewhere Ave. Marietta, GA 30334	10/05/2016 Expenditure		Campaign Signs 24X48.	\$2,500.00

FILER ID: C2016000191

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Expenditures Made

Paid Expenditures Total for this period: \$2,500.00

State of Georgia
Campaign Contribution Disclosure Report
Investments Statement

Investment Name **There are No Investments this reporting period**

Institution/Person
Holding Account

Address

Address

City, State, Zip

There are No Investments this reporting period

Account Number

Value at beginning of reporting period

Value at end of reporting period

Cash Dividends

Interest Paid Out

Investment Transactions

State of Georgia
Campaign Contribution Disclosure Report

1. Report Type**Original Report****2. Filing is being made on behalf of:**
Candidate or Public OfficialC2016000191 -
*CFC Compliance Robert
Other State Office**Filing Office Use**

Only

E-Filed on

5/5/17 2:16 pm

Use Earlier of Post
Mark or Hand
Delivered Date**3. Identifying and Contact Information**(1) *CFC Compliance Robert

Full Name of Candidate or Non-Candidate Campaign Committee

(2) 05/05/2017

Today's Date

(3) 200 Piedmont Ave Atlanta, GA 30334

Mailing Address

(4) Telephone number is unavailable.

Contact Phone Number (We will understand the release of this information as permission to call your office if necessary.)

(5) If a Candidate or Public Official, is there a campaign committee (one or more persons) to make campaign transactions, keep the financial records of the campaign, or file the reports? NO (6) If so, is the Committee registered with the State Ethics Commission? NO

(7)

Name of Chairperson and / or Treasurer of Committee

4. Period for which you are Reporting

My Non Election Year	My Election Year	Run-Offs (Report Require Only if you are in a Run Off Election)	Special Elections (Report Require Only if you are in a Special Election)
<input type="checkbox"/> January 31, 2016 <input type="checkbox"/> June 30, 2016	<input type="checkbox"/> January 31, 2016 <input type="checkbox"/> March 31, 2016 <input type="checkbox"/> June 30, 2016 <input type="checkbox"/> September 30, 2016 <input type="checkbox"/> October 25, 2016 <input checked="" type="checkbox"/> December 31, 2016	<input type="checkbox"/> 6 days before Primary Run-Off, 2016 <input type="checkbox"/> 6 days before General Run-Off, 2016 <input type="checkbox"/> 6 days before Special Primary Run-Off, 2016 <input type="checkbox"/> 6 days before Special Run-Off, 2016	<input type="checkbox"/> 15 days before Special Primary, 2016 <input type="checkbox"/> 15 days before Special, 2016 <input type="checkbox"/> Dec. 31, 2016
Supplemental Reporting <input type="checkbox"/> June 30, 2016 <input type="checkbox"/> December 31, 2016 <small>*Persons leaving office with excess funds until such funds are expended as provided in the Act *Unsuccessful candidates with excess funds, or who receive contributions to retire debt incurred, until such funds are expended, or such unpaid debts are satisfied</small>			

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State of Georgia
Campaign Contribution Disclosure Report
Summary Report

CONTRIBUTIONS RECEIVED

1	I Have: The following contributions, including Common Source, to report:	<u>In-Kind</u> <u>Estimated Value</u>	<u>Cash Amount</u>
2	Total contributions previously reported.	\$0.00	\$13,500.00
3	Total amount of all itemized contributions received in this reporting period which are listed on the "Itemized Contributions" page.	\$0.00	\$1,000.00
3a	All loans received this reporting period.		\$0.00
3b	Interest earned on campaign account this reporting period.		\$0.00
3c	Total amount of investments sold this reporting period.		\$0.00
3d	Total amount of cash dividends and interest paid out this reporting period.		\$0.00
4	Total amount of all separate contributions of \$100.00 or less received in this reporting period and not listed on the "Itemized Contributions" page. "Common Source" contributions must be aggregated on the "Itemized Contributions"	\$0.00	\$0.00
5	Total contributions reported this reporting period. (Line 3 + 3a + 3b + 3c + 3d + 4)	\$0.00	\$1,000.00
6	Total contributions to date. (Line 2 + 5)	\$0.00	\$14,500.00

EXPENDITURES MADE

7	I Have: The following expenditures to report:	<u>In-Kind</u> <u>Estimated Value</u>	<u>Cash Amount</u>
8	Total expenditures made and reported prior to this reporting period.	\$0.00	\$0.00
9	Total amount of all itemized expenditures made in this reporting period which are listed on the "Itemized Expenditures" page.	\$0.00	\$6,000.00
10	Total amount of all separate expenditures of \$100.00 or less each that were made in this reporting period and not listed on the "Itemized Expenditures" page.	\$0.00	\$0.00
11	Total expenditures reported this reporting period. (Line 9 + 10)	\$0.00	\$6,000.00
12	Total expenditures to date. (Line 8 + 11)	\$0.00	\$6,000.00

INVESTMENTS

13	Amount of investments at the beginning of this reporting period.		\$0.00
14	Total amount of investments at the close of this reporting period.		\$0.00
15	Net Balance On Hand. (Line 6 - 12 + 14)		\$8,500.00

State of Georgia
Campaign Contribution Disclosure Report
Outstanding Indebtedness

General 2016 Indebtedness		<u>Amount</u>
1	Outstanding indebtedness at the beginning of this reporting period.	\$10,000.00
2	Loans received this reporting period.	\$0.00
3	Deferred payments of expenses this reporting period.	\$0.00
4	Payments made on loans this reporting period.	\$6,000.00
5	Credits received on loans/deferred payments this reporting period.	\$0.00
6	Payments this period on previously deferred expenses.	\$0.00
7	Total indebtedness at the close of this reporting period. (line 1 + 2 + 3 - 4 - 5 - 6)	\$4,000.00

State of Georgia
Campaign Contribution Disclosure Report
Itemized Contributions

Must list contributions received by a single contributor for which the aggregate total is more than \$100.00

Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
Doe, John 1234 Atlanta Ave. Atlanta, Georgia 30334	12/15/2016 Monetary	a. Attorney b. State of Georgia	2016 General	\$1,000.00	\$0.00

FILER ID: C2016000191

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Contributions Received

In-Kind Total for this period:	\$0.00
Cash Contributions Total for this period:	\$1,000.00

State of Georgia
Campaign Contribution Disclosure Report
Loan Reporting

Name of Lender Mailing Address	Date of Loan Amount of Loan Election Cycle	Person(s) responsible for repayment of loan Mailing Address	Occupation & Place of Employment Fiduciary Relationship
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I have no loans to report this reporting period.

State of Georgia
Campaign Contribution Disclosure Report
Itemized Expenditures

Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00

List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
SunTrust Bank 1234 Cobb Ave. Atlanta, GA 30334	12/15/2016 Loan Repayment		Loan Repayment (SunTrust Bank)	\$1,000.00
SunTrust Bank 1234 Cobb Ave. Atlanta, GA 30334	12/20/2016 Loan Repayment		Loan Repayment (SunTrust Bank)	\$5,000.00

FILER ID: C2016000191

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Expenditures Made

Paid Expenditures Total for this period: **\$6,000.00**

State of Georgia
Campaign Contribution Disclosure Report
Investments Statement

Investment Name **There are No Investments this reporting period**

Institution/Person
Holding Account

Address

Address

City, State, Zip

There are No Investments this reporting period

Account Number

Value at beginning of reporting period

Value at end of reporting period

Cash Dividends

Interest Paid Out

Investment Transactions