

TO: [ ] JEANNE [ ] JAY  
[ ] LYNN [ ] BARBARA  
[ ] RICH [ ] BOB S.  
[ ] HELEN [ ] OTHER \_\_\_\_\_

J. Pritchard  
FROM: \_\_\_\_\_

DATE: 1/13/84

*No. T-84-029*

[X] TELEPHONE ADVICE - SEE BELOW

[ ] CORRESPONDENCE ADVICE - SEE ATTACHED DRAFT  
(IF YOU HAVE ANY COMMENTS, NOTIFY ADVISOR WITHIN 1 DAY)

FILE LOCATION: 86203; 18619

INCLUDE IN ADVICE PACKAGE: YES [ ] NO [X]

CALLER Fred Lowell

REPRESENTING Pillsbury, Madison & Sutro

PHONE NUMBER: \_\_\_\_\_

QUESTION: Does the gift limitation of \$10 apply to all lobbyists employed by a retained entity, or may each lobbyist make gifts totalling \$10 in a calendar month to a legislative official? In this case, a lobbyist employs one other lobbyist and a secretary and would like to know if he, the other lobbyist and the secretary may each make a gift totalling \$10 to one legislator.

ANSWER: In this situation, the \$10 limitation applies to the the three of them, since it can be assumed that the lobbyist who is the employer is directing the others in making gifts, and therefore the others would be "agents" of the lobbyist who is the employer.

The gift limitation applies to the "assets of a retained entity" whenever there has been any prior agreement or coordination between employees of the retained entity with regard to making a gift.