

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance • • Administration • • Executive/Legal • • Enforcement  
(916) 322-5662 322-5660 322-5901 322-6441

April 25, 1984

Rich Eichman  
Nielsen, Hodgson, Parrinello & Mueller  
1225 Eighth Street, Suite 550  
Sacramento, CA 95814

Re: FPCC No. A-84-097

Dear Rich:

This is to confirm the advice I provided to you by telephone regarding reporting contributions and expenditures by lobbyist employers and persons who spend \$2,500 to influence legislative or administrative action. You asked whether such filers are required to report on their quarterly reports (Form 650) contributions made by their political action committees.

Gov. Code Section 86109(f) requires that employers and persons who spend \$2,500 report the date and amount and the name of the recipient of each contribution made during the period covered by the quarterly report. In addition, such filers must report on their quarterly reports the same information about contributions and expenditures made by the political action committees they sponsor.

Commission regulation 2 Cal. Adm. Code Section 18419(a) (1) states that a political action committee is "sponsored" by an organization if:

The PAC receives all or nearly all of its contributions from the organization or the members, employees or shareholders of the organization.

Because of the close relationship between a political action committee and its sponsoring organization,

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contributions and expenditures made by a political action committee are deemed to be made by the sponsoring organization and, therefore, must be reported on the organization's quarterly lobbying disclosure report.

Thank you for your inquiry. Please call me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jeanne Pritchard". The signature is written in dark ink and is positioned above the typed name.

Jeanne Pritchard  
Political Reform Consultant

TO: [ ] JEANNE [ ] JAY [ ] OTHER: \_\_\_\_\_ FROM: J.Prithcard

[ ] LYNN [ ] BARBARA

DATE: 4/25/84

[ ] JEANETTE [ ] ALICE

[ ] HELEN [ ] MARY ANN

[ ] CARLA

[ ] TELEPHONE ADVICE - SEE BELOW

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

FILE LOCATION: \_\_\_\_\_

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

CALLER J.Richard Eichman

REPRESENTING Nielsen, Hodgson, Parrinello & Mueller

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

QUESTION: Must a lobbyist employer report on its quarterly disclosure  
report (Form 650) contributions made by a political action  
committee which the employer sponsors?

ANSWER: Yes. Such contributions are deemed to be made by the  
sponsoring organization (the lobbyist employer) and, therefore,  
must be reported on the employer's quarterly report.