



California Fair Political Practices Commission

June 24, 1987

Steven L. Dorsey
City Attorney for Carson
c/o Richards, Watson & Gershan
Thirty-Eighth Floor
333 South Hope Street
Los Angeles, CA 90071-1469

Re: Your Request for Informal Assistance
Our File Nos. I-87-130 and I-87-131

Dear Mr. Dorsey:

You have requested informal assistance to provide you with written confirmation of your analysis of reporting responsibilities for two of your clients, Sylvia Muise and Howard Homan. You have specifically advised me by telephone that you are seeking informal assistance as you have not sought your clients' specific authorization to seek formal written advice.^{1/}

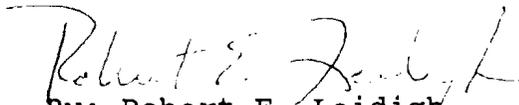
Your request for confirmation is a follow-up on our advice letter to you on behalf of Sylvia Muise, No. A-86-248. That letter is incorporated herein by reference as are your two recent letters to me.

This letter will confirm our telephone conversation as related in your two letters. You have accurately stated my advice to you regarding the proper analysis of your clients' respective reporting obligations under these circumstances.

I trust this satisfactorily responds to your request.

Sincerely,

Diane M. Griffiths
General Counsel


By: Robert E. Leidigh
Counsel, Legal Division

REL:km

^{1/} Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

RICHARD RICHARDS
GLENN R. WATSON
ROBERT G. BEVERLY
HARRY L. GERSHON
DOUGLAS W. ARGUE
MARK L. LAMKEN
ARNOLD SIMON
LEE T. PATERSON
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RICHARDS, WATSON & GERSHON

ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION

APR 30 9 52 AM '87

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333 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071-1469
(213) 626-8464

CABLE ADDRESS
RICHWAT
TELECOPIER (213) 626-0078

April 28, 1987

Robert Leidigh, Esq.
Staff Attorney
Fair Political Practices Commission
P.O. Box 807
Sacramento, California 95804

Re: Statement of Economic Interests
Filed by Sylvia Muise

Dear Mr. Leidigh:

I am sending you this letter to confirm various telephone conversations we had at the end of March concerning how Councilwoman Muise should disclose contributions to the reception held following the memorial service for Leonard Muise. Please contact me if your recollection is different than mine, as I advised Councilwoman Muise to complete her Statement in accordance with my understanding of our discussions.

The determinations we reached are as follows:

1. Councilwoman Muise had made a reasonable attempt under the circumstances to discover all persons contributing \$50 or more toward the reception. Mrs. Muise will amend her Statement if any other contributors should subsequently be discovered. In this regard, I informed you that the numbers I have received from the various sources I contacted are all consistent and appear to be accurate.

2. Councilwoman Muise should disclose all persons who contributed, prior to January 1, 1987, \$50 or more toward the reception if the intent of the donor was to benefit her or her family or to honor Leonard Muise. As we discussed, it appears to me that the intent of all the contributors was to honor Leonard Muise. As a result, Councilwoman Muise would disclose all

Robert Leidigh, Esq.
April 28, 1987
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persons and companies contributing \$50 or more toward the costs of the reception.

3. Councilwoman Muise would disclose Howard Homan as an intermediary for the entire cost of the reception. Jay's Catering will be listed as contributing an amount equal to the discount they offered toward the reception.

4. Shirley Brown would be listed as an intermediary for the total amount of the sums paid by the Leonard Muise Memorial Fund to Jay's Catering. Ms. Brown would also be listed separately as a donor of the individual contribution she made to the Leonard Muise Memorial Fund that exceeded \$50.

5. Councilwoman Muise should list the anonymous \$100 contribution provided to the Leonard Muise Memorial Fund and indicate on her Statement that she will amend her Statement if she ever learns the source of that contribution.

Thank you for your assistance in helping me determine how to advise Councilwoman Muise to complete her Statement of Economic Interests.

Very truly yours,



Steven L. Dorsey
Assistant City Attorney

SLD:kw
A027

cc: Howard Homan



California Fair Political Practices Commission

May 1,, 1987

Steven Dorsey
Richards, Watson & Gershon
333 South Hope Street, 38th Floor
Los Angeles, CA 90071-1469

Re: 87-131

Dear Mr. Dorsey:

Your letter requesting advice under the Political Reform Act was received on April 30, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact Robert Leidigh, an attorney in the Legal Division, directly at (916) 322-5901.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Adm. Code Sec. 18329).) You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,


Diane M. Griffiths
General Counsel

DMG:plh
cc: Sylvia Muise



California Fair Political Practices Commission

May 1,, 1987

Steven Dorsey
Richards, Watson & Gershon
333 South Hope Street, 38th Floor
Los Angeles, CA 90071-1469

Re: 87-130

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Diane M. Griffiths
General Counsel

DMG:plh
cc: Howard Homan

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Robert Leidigh, Esq.
Staff Attorney
Fair Political Practices Commission
P.O. Box 807
Sacramento, California 95804

Re: Statement of Economic Interests
Filed by Howard Homan

Dear Mr. Leidigh:

I am writing this letter to confirm our telephone conversation at the end of March concerning the Statement of Economic Interests filed by Howard Homan, the Director of Parks and Recreation of the City of Carson. Please contact me if this letter does not accurately reflect your understanding of our conversation, as I advised Mr. Homan to complete his Statement in accordance with that conversation.

As we discussed, Mr. Homan must list as a donor of a gift all persons who contributed \$50 or more to the reception following the memorial service for Leonard Muise if the intent of the donor was to benefit Mr. Homan. If the intent was to benefit Councilwoman Muise or honor her late husband, the donors would be listed instead on Mrs. Muise's Statement.

As I indicated to you, it appears from my understanding of the facts and from discussions with various persons who contributed to the reception that the intent of the contributors was to honor Leonard Muise. As a result, I informed you that Mr. Homan would not be listing any of the contributors on his Statement covering the year 1986.

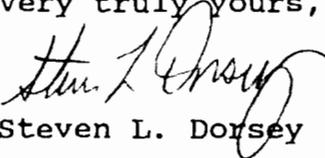
Jay's Catering has indicated to me that they intend to hold Mr. Homan responsible for the outstanding balance for the

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reception. Under the circumstances, any person contributing to the cost of the reception during 1987 will be presumed, unless there is evidence to the contrary, to be intending to benefit Mr. Homan. As a result, any such contributors will be listed on Mr. Homan's Statement of Economic Interests covering 1987.

Thank you for assisting me in determining how to handle disclosure of the reception.

Very truly yours,



Steven L. Dorsey

SLD:kw
A026

cc: Howard Homan