

March 22, 1989

MEMO TO FILE

Technical Assistance and Analysis Division
Mary Ann Kvasager

RE: Telephone Advice Provided to Barbara Rhomberg,
City of Oakland

T89-123

The attached letter dated February 15, 1989 from Barbara Rhomberg, Administrative Assistant, City of Oakland, correctly summarizes the telephone advice I provided to her. Ms. Rhomberg did not request written advice.

FEB 22 11 43 AM '89

CITY OF OAKLAND



CITY HALL ONE CITY HALL PLAZA OAKLAND CALIFORNIA 94612

Mary Moore
Councilmember

415/273-3266
TTY/839-6451

February 15, 1989

Ms. Marianne Kvaseger
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, CA 95814

Dear Marianne,

Thank you for answering my questions regarding the campaign contribution limits for partnerships and partners under Proposition 73. Despite your clear exposition, I'm anxious to verify that I understood the limits correctly. This letter will confirm our conversation.

As I understood it, there are three possible situations regarding contributions from partnerships:

1. If one partner owns 50% or more of the firm, then any contribution made by the firm will count against that partner's limit. In other words, the sum of the majority partner's personal contribution and the firm's contribution may not exceed \$1000.
2. If the partner owns less than 50% of the firm, and does not direct the firm's contribution, then the partner may contribute up to \$1000 from personal funds without regard to the contribution by the firm. (The firm is also limited to \$1000.)
3. If the partner owns less than 50% of the firm, but does direct the firm's donation, then -- as in the first case -- the total of the partner's personal contribution and the firm's contribution may not exceed \$1000.

I expect no answer to this letter unless my understanding is erroneous. Again, I appreciate your help on this aspect of the new contribution limits.

Sincerely,

Barbara Rhomberg
Administrative Assistant

Marianne Krusegar
Fair Political Practices Commission
428 S Street Ste 800
Sacramento CA 95814


CITY OF OAKLAND
City Council
ONE CITY HALL PLAZA
OAKLAND, CALIFORNIA 94612



California Fair Political Practices Commission

February 27, 1989

Barbara Rhomberg
Administrative Assistant
City of Oakland
City Hall
One City Hall Plaza
Oakland, CA 94612

Re: Letter No. 89-123

Dear Ms. Rhomberg:

We received your letter requesting confirmation of advice under the Political Reform Act on February 22, 1989. Your letter has been assigned to our Technical Assistance and Analysis Division or response. If you have any questions, you may contact them directly at (916) 322-5662.

If the letter is appropriate for confirmation without further analysis, we will attempt to expedite our response. A confirming response will be released after it has gone through our approval process. If the letter is not appropriate for this treatment, the staff person assigned to prepare the response will contact you shortly to advise you. In such cases, the normal analysis, review and approval process will be followed.

You should be aware that your letter and our response are public records which may be disclosed to any interested person upon receipt of a proper request for disclosure.

Sincerely,

Diane M. Griffiths
Diane M. Griffiths
General Counsel

DMG:plh:confadv1