



California Fair Political Practices Commission

August 29, 1989

Amy Mittino
California Association of
Independent Business, Inc.
P. O. Box 1304
Ontario, CA 91762

Re: Your Request for Advice
Our File No. A-89-448

Dear Ms. Mittino:

You have requested confirmation of telephone advice provided to you on behalf of the California Association of Independent Business, Inc. (CAIB) concerning the lobbying disclosure provisions of the Political Reform Act (Government Code Sections 81000-91015).

Your letter, dated July 21, 1989, correctly summarizes my advice that CAIB should disclose on its lobbyist employer reports (Form 635) 100 percent of the payments made each quarter to the Association's full-time lobbyist, and 75 percent of its overhead and other expenses. A copy of your letter is enclosed for your convenience.

Please contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan
General Counsel

Carla J. Wardlow
By: Carla J. Wardlow
Assistant Chief, Technical
Assistance & Analysis Division

Enclosure



CAIB

F P P C

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STATE HEADQUARTERS
8137 MALACHITE
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RANCHO CUCAMONGA, CA 91730

MAILING
P O BOX 1304
ONTARIO, CA 91762
(714) 981-5912

California Association of Independent Business, Inc.

MS. CARLA WARDLOW
ASSISSTANT CHIEF
TECHNICAL ASSISTANCE AND ANALYSIS DIVISION,
F.P.P.C.
428 "J" STREET, SUITE #700
SACRAMENTO, CA. 95814

JULY 21, 1989

DEAR MS. WARDLOW,

AS PER OUR CONVERSATION ON JULY 20, 1989, I AM WRITING THIS LETTER TO CONFIRM MY UNDERSTANDING OF HOW CAIB SHOULD FILE OUR LOBBYIST EMPLOYER FORM #635.

AS I MENTIONED TO YOU OVER THE PHONE, CAIB IS AN INFORMATION SERVICE FOR SMALL BUSINESS. SINCE THIS INFORMATION IS ALSO USED IN OUR LOBBY EFFORT, AND BECAUSE WE HIRE A FULL TIME LOBBYIST, WE WILL FILE AS YOU ADVISED IN THE FOLLOWING MANNER:

ON THE LOBBYIST EMPLOYER FORM #635, SECTIONS IN QUESTION:

- A. 100% OF IN HOUSE LOBBYIST WAGES AND REIMBURSED EXPENSES.
- D. 75% OF OTHER PAYMENTS TO INFLUENCE.

PLEASE LET US KNOW IF THIS IS THE CORRECT WAY FOR US TO FILE.

THANK YOU,

Amy Mittino
AMY MITTINO



California Fair Political Practices Commission

July 28, 1989

Amy Mittino
California Association of
Independent Business, Inc.
P.O. Box 1304
Ontario, CA 91762

Re: Letter No. 89-448

Dear Ms. Mittino:

We received your letter requesting confirmation of advice under the Political Reform Act on July 26, 1989. Your letter has been assigned to our Technical Assistance and Analysis Division for response. If you have any questions, you may contact that division 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,

A handwritten signature in cursive script, appearing to read "Kathryn E. Donovan".

Kathryn E. Donovan
General Counsel

KED:plh:confadv1