FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

September 16, 2010

Mr. Aaron Read
Aaron Read & Associates
REDACTED

RE: **Advisory Letter**
FPPC File No. 10/793; Aaron Read & Associates

Dear Mr. Read:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act") found in Government Code Section 81000, and following. The Act requires lobbying firms to file periodic reports disclosing such things as the names of persons who contract with the firm for services, activity expenses, etc. (Section 86114.)

As you are aware, the Enforcement Division of the Commission received a complaint alleging that you failed to disclose the Funeral Directors Services Corporation as the source of payments amounting to $129,166 between 2005 and 2008 on your quarterly statements. In response to that allegation, you indicated that you receive two checks, one from the Funeral Directors Services Corporation and one from the California Funeral Directors Association, and that you report both payments as received from the California Funeral Directors Association.

Regulation 18613 requires that when reporting payments received, a lobbying firm shall disclose, among other things, the full name, address and telephone number of the person or entity making the payment; and if the payment was made on behalf of another person, the full name, address and telephone number of the person on whose payment the payment was made.

Since we have no evidence to indicate that you intentionally attempted to hide the payments from the Funeral Directors Services Corporation, we are closing our investigation on this matter. However, in the future you must report all payments

received by the Funeral Directors Services Corporation and must amend all previously filed quarterly statements.

The Commission publishes forms and manuals to facilitate compliance with the Act. If you need forms or a manual, or guidance regarding your obligations, please call the FPPC's Technical Assistance Division at (916) 322-5660, Monday through Thursday, between 9:00 a.m. and 4:00 p.m. Please also visit our website at www.fppc.ca.gov.

If you have questions regarding this matter, please contact me at (916) 322-8194.

Sincerely,

REDACTED

Jeanette E. Turvill
Political Reform Consultant
Enforcement Division

JT/jt