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

November 4, 2009

Dave Henson, Executive Director
Occidental Arts and Ecology Center
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Re: Advisory Letter
FPPC Case No. 06/0135; Occidental Arts and Ecology Center, Californians for GE-Free Agriculture

Dear Mr. Henson:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act").[1] As you are aware, the FPPC received a complaint alleging Occidental Arts and Ecology Center ("OAEC") and Californians for GE-Free Agriculture ("CGA") violated the Act. In summary, the complaint alleged that OAEC and CGA used donor funds to make political contributions, and violated the Act by not disclosing these donors as the true source of the funds on recipient committee campaign statements.

Our investigation did not reveal that donor funds were used to make political contributions and we did not find OAEC and CGA violated the Act. As a result, we are closing this case with this advisory letter.

Please be advised under Regulation 18215, subdivision (b)(1) there is a presumption that donors do not have reason to know that all or part of their payments made to an organization will be used for political activities in California unless the organization has made political expenditures or contributions totaling at least $1,000 during the calendar year or any of the immediately preceding four calendar years using donor funds. Once this

[1] The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

threshold has been met, if donor funds are used by the organization to make additional expenditures or contributions, the donors, not the organization, are reportable as the contributors on the required campaign statement.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act and provides guidance regarding filing obligations over the telephone and through written advice. If you need forms or manuals, or guidance regarding your obligations, please call the Commission's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov.

Please feel free to contact me at (916) 322-5660 with any questions you may have regarding this letter.

Sincerely,

REDACTED

Grant Beauchamp
Program Specialist
Enforcement Division