

December 21, 1977

11-283

Patricia Cain
Aero Vironment, Inc.
145 Vista Avenue
Pasadena, California 91107

Dear Ms. Cain:

Enclosed is a copy of the letter sent, following their telephone conversation, by Natalie West of our staff to Robert Burt of the California Manufacturers Association. As you can see the advice given referred only to expenditures by members of the Association that employ lobbyists.

Persons, including your company, whose payments to influence legislative or administrative action at the state level total \$250 or more in any month have an obligation under Government Code Section 86108(b) to report those payments. However, this requirement does not apply if all of the payments made by the person were in the form of payments to benefit state officials or members of their immediate families (Government Code Section 82045(c)).

As you have described your participation in the APCA meeting, all of your payments were in the nature of those exempted from the reporting requirements as noted above. Consequently, you had no obligation to report the expenditure, and there was no need to submit a list of the beneficiaries of that expenditure.

Sincerely yours,

John Giansello
Political Reform Analyst

JG:bw

Enclosure