

January 3, 1977

Ed Soderberg
Public Relations Consultant
1325 "O" Street
Sacramento, California 95814

77-335

Dear Mr. Soderberg:

I have reviewed the data furnished in your letter of December 17, 1976 and have discussed the situation with members of the Commission staff. Any person who directly hires or retains a lobbyist for purposes of influencing legislative or administrative action or any person who spends \$250 or more in any month to influence legislative or administrative action must file reports in accordance with Government Code Section 86109. If a person hires or retains a lobbyist only to gather and/or provide informational material that person is not an employer of a lobbyist (as used in Government Code Section 86108(a)) and need not file reports in accordance with Section 86109. Similarly, the lobbyist need not disclose on his lobbyist report payments received from that person.

I suggest you file an amendment to your registration statement to delete those persons who have contracted with you for informational services only.

If you have any further questions please do not hesitate to contact me.

Sincerely,

Rich Eichman
Compliance Representative

RE:bw

cc: David Pitman
Secretary of State's Office

bcc: Jeanne P.

77335

LEGISLATIVE ADVOCATE	POLITICAL ACTION	es	ed soderberg
PUBLIC AGENCY LIAISON	CAPITOL NEWSLETTERS		PUBLIC RELATIONS CONSULTANT
			GOVERNMENT AFFAIRS

1325 "D" STREET
SACRAMENTO, CA 95814
(916) 444 0901

December 17, 1976

465 SOUTH PALM DRIVE
BEVERLY HILLS, CA 90212
(213) 288 8660

DEC 21 11 57 AM '76

Richard Eichman, FPPC,
1100 K Street,
Sacramento, CA. 95814

Dear Mr. Eichman:

Attached is the bale of report copies, instructions to employers, revised reports, and even the attempts to secure "late report fine" penalties from the employers who were not aware their employment of me made them "lobbyist employers" until Rudy Nothenberg's April 1975 decision gave them that appellation.

Also copy of my letter to the Secretary of State, indicating the surprise expressed earlier to you that reports were needed specifically to end a third calendar quarter even if the legislature was not in session - as the FPPC bulletin indicated of 12-8-76.

While I have nothing to hide, and feel, actually I can lobby perhaps more forcefully and efficiently since there is no overt competition from "big purse" representatives as there may have been in the past, there are horrible inequities in this FPPC setup, particularly for low-income or no-income representatives of nonprofit organizations, for reputable but "poor" candidates for office, for underfinanced individuals and organizations attempting to provide factual information, research results, seek revisions of idiotic, unintentioned, administrative and agency decisions, etc.

And as one of probably many "one man band" representatives with no funds for employees, etc., reports, letters, pleas, files, etc., make a costly and often nonvital addition to the work we should do.

Appreciated, in your consideration of the Soderberg/Brick & Tile Association stand against "Lobbying" status, will be your review and decision at your early convenience.

Sincerely, respectfully,

Enclosures: 1 bale

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M-87-171

82030

Alimony, Child Support, Personal Injury Settlement

Alimony and child support are income. Personal injury settlements arising out of litigation, or contemplated litigation which is received from the tort-feasor's company are income. Payment under one's own insurance policy, on the other hand, is not income pursuant to Section 82030(b)(7).

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