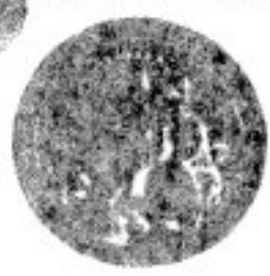


82030

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance Administration	• • •	Executive Board	• • •	Enforcement	• • •	Conflict of Interest
916 327 5660		322 5921		322 6441		322 6444

November 16, 1977

Donald E. and Linda B. Muir
926 J Street
Sacramento, California 95814

77-11-107

Dear Mr. and Ms. Muir:

This is in response to your letter to the Commission in care of me dated November 9 and asking for an informal opinion concerning the reporting of monies used to sponsor a reception in San Francisco on November 21. You may treat this letter as informal advice of the Commission issued pursuant to Government Code Section 83114(b).

The facts as we understand them are as follows. Solam and Associates, a San Francisco public relations firm, will sponsor a reception to preview a book written by Senator J. Mills. A Committee, the Friends of James Mills, has been formed to raise funds to defray the costs of the reception. Senator Mills himself will realize no monetary gain from the event except that he will attend the event free of charge and in all probability realize some intangible economic benefit from the promotion of the book at the reception.

You ask how this should be reported under the Political Reform Act, and indicate that it is the Committee's intention to do so within the context of Government Code Section 84100, et seq. Generally speaking, under those provisions, all contributions and expenditures of the Committee meeting certain threshold levels would be reported.

The staff agrees that this is an acceptable manner of reporting the receipt and expenditure of the monies in question. AS I indicated to you on the telephone, there is the alternative methodology of having Senator Mills report the benefit accruing to him personally on his Statement of Economic Interests filed pursuant to Government Code Section 87200. It is our view that either alternative is legally acceptable under the Act. To the extent that you elect to report the transaction under Chapter 4 of the Act, Mr. Mills need not report the monies under Section 87200. See Government Code Section 82030(b)(1). It is my understanding that you will elect to file as a political committee.

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Donald E. and Linda B. Muir
November 16, 1977
Page Two

I trust this answers your question. Thank you for writing. If I can be of further assistance in this or any other matter, please feel free to call on me at 322-6444.

Sincerely,

Kenneth W. Goshorn

Kenneth W. Goshorn
Research Specialist III
Conflicts of Interest Division

KW:mfa

77107

Nov 1 1977

November 9, 1977

Mr. Ken Gashorn
Fair Political Practices Commission
1100 K Street
Sacramento, California 95814

Dear Ken,

A situation has developed with regard to Senator James Mills about which we need an opinion from the Fair Political Practices Committee.

Senator Mills has written a book, titled The Gospel According to Pontius Pilate, which will be introduced at a reception in San Francisco on November 21st. All arrangements for this reception are being handled by a San Francisco public relations firm, Solem and Associates, 55 New Montgomery Street, Suite 504, San Francisco 94105. Funds are being raised specifically and solely to pay the fee which will be submitted by Solem and Associates. Senator Mills is involved only in the sense that he will appear at the reception and will help to publicize his book there.

Since we do not know at this time how to deal with the reporting of the funds raised to pay the costs of the book's introduction, a committee, The Friends of James Mills, has been established and a form 410 is being filed with the office of the Secretary of State. Pending an opinion from your commission, all funds and expenditures will be reported in compliance with those laws governing political committees.

We would appreciate an answer from you on this matter as soon as possible.

Sincerely,
Donald E. Muir
Linda B. Muir
Donald E. Muir
Linda B. Muir