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# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • 1100 K STREET BUILDING, SACRAMENTO, 95814  
107 SOUTH BROADWAY • • • SUITE 2140A • • • LOS ANGELES, 90012

August 16, 1977

A-77-432

Honorable Robert E. Badham  
Member of Congress  
1649 Westcliff Drive  
Newport Beach, California 92660

Dear Congressman Badham:

This letter is to confirm my advice to Nancy Bettcher of your staff on August 9, 1977. I spoke with Ms. Bettcher at the request of Kevin Monroe of the Secretary of State's office following receipt by the Secretary of your July 11, 1977 letter.

Ms. Bettcher stated that, as a result of a Federal Elections Commission ruling, the Badham Congressional Committee refunded approximately \$3,000 to the Badham Fund, your controlled committee during the time you were a member of the California Legislature. She stated that the refund represented that portion of corporate contributions collected by the Badham Fund which in turn was used to pay for an opinion survey in connection with your congressional campaign. She stated that the funds would not be used in connection with state or local elections but rather for congressional office expenses in 1977. Since the Badham Fund was terminated November 22, 1976, she asked how the refund should be reported. Since the refund will not be used for "political purposes," as defined by the Fair Political Practices Commission in 2 Cal. Adm. Code Section 18215, it does not fall within the meaning of "contribution" in Government Code Section 82015 and, therefore, is not reportable under the Political Reform Act.

I hope this information is helpful. If you have further questions, please contact our staff.

Sincerely yours,

*Nan Emmerson by J.H.*  
Nan Emmerson  
Special Compliance Representative

NE:jg

cc: Kevin Monroe  
Office of Secretary of State  
Post Office Box 1467  
Sacramento, CA 95807

**Congress of the United States**  
**House of Representatives**

ROBERT E. BADHAM  
40TH DISTRICT, CALIFORNIA

RECEIVED  
AND FILED  
In the office of the Secretary of State  
of the State of California

JUL 19 1977

MARCH FONG EU, Secretary of State

July 11, 1977

Honorable March Fong Eu  
SECRETARY OF STATE  
State Capitol  
Sacramento, California 95814

RE: THE BADHAM FUND - I.D. #745130

Dear Madam Secretary:


This is to advise that "The Badham Fund," a campaign committee which was terminated on November 22, 1976, has received a refund as a result of a Federal Election Commission agreement.

Therefore, "The Badham Fund" account has been reopened in order to accept this refund.

Please advise me of the reporting requirements of this account based on the fact that the funds will not be used for the purpose of any campaign for my election to a state office.

I will await your response in order to comply with any reporting requirements.

Cordially,

  
ROBERT E. BADHAM  
Member of Congress

REB:n1b

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Congress of the United States  
House of Representatives  
Washington, D.C. 20515  
OFFICIAL BUSINESS

Honorable March Fong Eu  
SECRETARY OF STATE  
State Capitol  
Sacramento, California 95814



M.C.