

Memorandum

To : David Pitman, Chief
Political Reform Division
111 Capitol Mall

Date : April 5, 1978

78-234

From : FAIR POLITICAL PRACTICES COMMISSION
Technical Assistance and Analysis Division

Subject:

This memorandum is in response to your January 27, 1978, request for guidance regarding the appropriateness of lobbyist employers filing consolidated periodic reports.

Government Code Section 86108(a) states in relevant part:

"... the following persons shall file ... statements ...
(a) any person who employs or contracts for the services of one or more lobbyists, whether independently or jointly with other persons ..."

It is the staff's view that, in general, a parent corporation and its wholly-owned subsidiaries should be permitted to file consolidated periodic reports in every case. In all other cases, however, consolidated reporting should not be permitted without our specific approval.

Of the examples which you provided with your January 27, 1978 memorandum, and as supplemented by your March 17, 1978 memorandum, the lobbyist employers which file consolidated periodic reports are for the most part parents and their wholly-owned subsidiaries. There were two exceptions. "Continental Heller Corporation and Swinerton and Walberg Company, a joint venture" and "Southern California Rock Products Association and Southern California Ready Mixed Concrete Association" are also listed as filing consolidated periodic reports but they are not parents and subsidiaries. It is the staff's opinion that the joint venture between "Continental Heller Corporation and Swinerton and Walberg Company" should be permitted to file a consolidated report since a single entity, the joint venture, is employing the lobbyist.


Regarding the example of the "Southern California Rock Products Association and Southern California Ready Mixed Concrete Association," we are not presented with any specifics of their relationship and cannot reach a determination as to the appropriateness of a consolidated filing in their case. Therefore, we conclude they should file separate reports until such time as additional facts are provided and a determination can be made.

April 5, 1978

Finally, we recommend that your office establish a system of cross-referencing, if one does not exist, for those cases where consolidated reports are filed by other than a parent and its wholly-owned subsidiaries.

If I can be of further assistance, do not hesitate to contact me.

Sincerely,



Alan Herndon
Compliance Representative

AH:bw

Memorandum

To : Alan Herndon
Fair Political Practices Commission

F P P C
JAN 30 4 36 PM '78

Date: January 27, 1978

From : **Secretary of State** - DAVID B. PITMAN, Manager
Political Reform Division

*Copy to
Berma*

Subject: Consolidated Reports Filed by Lobbyist Employers

In April, 1977, we were given qualified approval by the Commission staff to allow consolidated statements to be filed by Chevron USA, Inc. and Standard Oil Company of California based on the determination that they were "acting in concert."

We have the situation where Southern California Rock Products Association and Southern California Ready Mixed Concrete Association have been filing consolidated statements. I understand that you have advised this office that in this instance such consolidation should not be allowed.

At the present time, Southern California Rock Products Association and Southern California Ready Mixed Concrete Association file separate reports. Separate reporting began with the September, 1977, report at the suggestion of R. Slagle, an auditor with the Franchise Tax Board.

In view of Government Code Sections 86108(a) and 82047, we have allowed lobbyist employers to file consolidated reports. Would you specifically advise with respect to reports submitted by Southern California Rock Products Association and Southern California Ready Mixed Concrete Association why consolidation is inappropriate and provide guidelines to this agency on when such consolidations should be allowed.

Memorandum

To : Al Herndon
Fair Political Practices Commission

Date: March 17, 1978



From : **Secretary of State** - DAVID B. PITMAN, Manager
Political Reform Division

Subject: Consolidated Filings by Lobbyist Employers

Attached as requested are lobbyist authorization forms (Forms 61A) and sample employer report forms (Forms 650) for employers filing consolidated reports under Chapter 6 of the Political Reform Act.

If you have any questions, please contact Gene Morrow.

MAR 21 3 46 PM '78

Attachments

Memorandum

12234

To: Alan Herndon
Fair Political Practices Commission

Date: January 27, 1978

From: *[Signature]*
Secretary of State - DAVID B. PITMAN, Manager
Political Reform Division

*Copy to
Herndon*

Subject: Consolidated Reports Filed by Lobbyist Employers

In April, 1977, we were given qualified approval by the Commission staff to allow consolidated statements to be filed by Chevron USA, Inc. and Standard Oil Company of California based on the determination that they were "acting in concert."

We have the situation where Southern California Rock Products Association and Southern California Ready Mixed Concrete Association have been filing consolidated statements. I understand that you have advised this office that in this instance such consolidation should not be allowed.

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In view of Government Code Sections 86108(a) and 82047, we have allowed lobbyist employers to file consolidated reports. Would you specifically advise with respect to reports submitted by Southern California Rock Products Association and Southern California Ready Mixed Concrete Association why consolidation is inappropriate and provide guidelines to this agency on when such consolidations should be allowed.



Form 61A
LOBBYIST

LOBBYIST ACTIVITY AUTHORIZATION

(GOVERNMENT CODE SECTION 86101)

RECEIVED
AND FILED
in the office of the Secretary of State
of the State of California
APR 04 1977
MARCH FONG EU, Secretary of State

I hereby authorize Arthur B. Becker of
(NAME OF LOBBYIST)

Colonial Penn Insurance Company, 5 Penn Center Plaza, Philadelphia to engage in the activities of a
(ADDRESS) Pennsylvania 19103

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

Colonial Penn Insurance Company 5 Penn Center Plaza, Philadelphia, PA 19103
(NAME OF EMPLOYER) (ADDRESS)

for Indefinite
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on 3/30/77 at Philadelphia, Pennsylvania 19103
(DATE) (CITY AND STATE)

by *James P. Morrison*
(SIGNATURE)

James P. Morrison

Title Secretary
(RELATIONSHIP TO EMPLOYER)



Form 61A
LOBBYIST

LOBBYIST ACTIVITY
AUTHORIZATION
(GOVERNMENT CODE SECTION 86101)

RECEIVED
AND FILED
in the office of the Secretary of State
of the State of California
DEC 27 1976
MARCH FONG EIL, Secretary of State

I hereby authorize Mark G. Wolkoff
(NAME OF LOBBYIST)

Colonial Penn Life Insurance Company
5 Penn Center Plaza, Philadelphia, Pennsylvania 19103 to engage in the activities of :
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

Colonial Penn Life Insurance Company (NAME OF EMPLOYER) 5 Penn Center Plaza, Phila., Pa. 19103 (ADDRESS)

for Indefinite
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on December 16, 1976
(DATE)

at Philadelphia, Pennsylvania
(CITY AND STATE)

by Arthur B. Becker
(SIGNATURE)

Title Arthur B. Becker
Vice President
(RELATIONSHIP TO EMPLOYER)



LOBBYIST ACTIVITY
AUTHORIZATION

(GOVERNMENT CODE SECTION 86101)

RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
APR 04 1977
MARCH FONG EU, Secretary of State

New

I hereby authorize Arthur B. Becker of
(NAME OF LOBBYIST)

Colonial Penn Franklin Insurance Company, 5 Penn Center Plaza, to engage in the activities of a
(ADDRESS) Philadelphia, Pennsylvania 19103

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

Colonial Penn Franklin Insurance Company 5 Penn Center Plaza, Phila., PA 19103
(NAME OF EMPLOYER) (ADDRESS)

for Indefinite
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on 3/30/77 at Philadelphia, Pennsylvania 19103
(DATE) (CITY AND STATE)

by *J.P.M.*
(SIGNATURE)

James P. Morrison

Title Secretary
(RELATIONSHIP TO EMPLOYER)



**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

FORM 650

Period 12 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
JAN 12 1978
MARCH FONG ELL Secretary of State
[Signature]

Michael D. Monette

FULL NAME OF FILER

5 Penn Center Plaza, Philadelphia, PA 19103

BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)

(215) 988-8355 See attached. A

BUSINESS PHONE (INCLUDE AREA CODE) FEDERAL EMPLOYER IDENTIFICATION NO. FOR OFFICIAL USE ONLY

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
NONE		NONE

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)	
OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	SALARIES, FEES, RETAINERS	REIMBURSEMENT OF EXPENSES	ADVANCES OR OTHER PAYMENTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	Michael D. Monette represents Colonial Penn Franklin Ins. Co. Colonial Penn Life Ins. Co. and Colonial Penn Ins. Co. 5 Penn Center Plaza Philadelphia, PA 19103			NONE		

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on 1/4/78 at Phila., PA
(DATE) (CITY AND STATE)

by *Michael D. Monette*
(SIGNATURE OF FILER OR AUTHORIZED AGENT)

PART 4 - EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elected state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.

NONE

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

- WITH BUSINESS ENTITY (Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)
If \$1,000 or more in a calendar year

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED

NONE

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS



Form 61A
LOBBYIST

**LOBBYIST ACTIVITY
AUTHORIZATION**

(GOVERNMENT CODE SECTION 86101)

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

NOV 22 1976

MARGH FONG EU, Secretary of State

of h/d Sec

I hereby authorize Robert L. Jordan
(NAME OF LOBBYIST)

500 7th St Apt. 11E Sacramento Cal 95814 to engage in the activities of
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf

General Electric Co & Affiliates Fairfield, Conn & Various Other Locations
(NAME OF EMPLOYER) (ADDRESS)

for 1977-78 Legislative Session
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on October 1, 1976 at San Jose, Cal
(DATE) (CITY AND STATE)

X by [Signature]
(SIGNATURE)

Title Manager- Relations Utilities Operator
(RELATIONSHIP TO EMPLOYER)



2-49

**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

**RECEIVED
AND FILED**
In the office of the Secretary of State
of the State of California
JAN 30 1978

FORM 650

Period 10 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

MARCH FONG EU, Secretary of State
met met met

GENERAL ELECTRIC COMPANY

FULL NAME OF FILER
175 Curtner Avenue San Jose CA 95125
BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)
(408) 925-3797 14-0689340 A
BUSINESS PHONE (INCLUDE AREA CODE) **FEDERAL EMPLOYER IDENTIFICATION NO.** **FOR OFFICIAL USE ONLY**

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
	AB 150; AB 1295; Undergrounding Hearing Testimony	Legislature; Energy Commission

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS
PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	(a) SALARIES, FEES, RETAINERS	(b) REIMBURSEMENT OF EXPENSES	(c) ADVANCES OR OTHER PAYMENTS (Attach Explanation)	(d) TOTAL THIS PERIOD	(e) CUMULATIVE TOTAL TO DATE
	Robert L. Jordan	11,125	2264	604	13,994	60,535

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)
 YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on 1/27/78 at San Jose, CA
(DATE) (CITY AND STATE)

by Edward A. Tristone
(SIGNATURE OF FILER OR AUTHORIZED AGENT)

ATTACHMENT

Other Receipts - Explanation

Life Insurance	\$138
Telecommunications	<u>\$466</u>
	\$604

PART 4-EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elective state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.
	None			

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

**- WITH BUSINESS ENTITY
If \$1,000 or more in a calendar year**

(Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED
	None				

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

LOBBYIST ACTIVITY

AUTHORIZATION

(GOVERNMENT CODE SECTION 85101)

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

DEC 29 1976

ARCH FONG ED. State

ND mb

I hereby authorize JOHN E. BALLUFF
(NAME OF LOBBYIST)

925 L Street, Suite 970, Sacramento, California 95814
(ADDRESS) to engage in the activities of

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

MOBIL OIL CORPORATION
and subsidiaries
(NAME OF EMPLOYER)

612 South Flower Street
Los Angeles, California 90017
(ADDRESS)

Until revoked.
(PERIOD OF AUTHORIZATION, IF KNOWN)

executed on December 27, 1976
(DATE)

at Los Angeles, California
(CITY AND STATE)

by BE Meahl
(SIGNATURE)

Title Regional Attorney
(RELATIONSHIP TO EMPLOYER)



**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

**RECEIVED
AND FILED**
in the office of the Secretary of State
of the State of California
FEB - 1 1978
PM 1/30/78
MARCH FONG ELI, Secretary of State
[Signature]

FORM 650

Period 11 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

MOBIL OIL CORPORATION (including Mobil Chemical & Mobil Oil Estates, Ltd.)
FULL NAME OF FILER
612 SOUTH FLOWER STREET LOS ANGELES CALIFORNIA 90017
BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)
(213) 683-5572 13 5401570 A
BUSINESS PHONE (INCLUDE AREA CODE) FEDERAL EMPLOYER IDENTIFICATION NO. FOR OFFICIAL USE ONLY

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
Consumer Finance Charges		Assemblyman Mike Cullen
AB 616, 807, 842, 944, 1043, 1295; SB 739		Legislature
Rule 1105, NOX Regulations, Rule 461		SCAQMD
Case 5436 (Regulation of Tank Trucking)		PUC
Service Station Vapor Recovery		CARB

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS
PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	(a) SALARIES, FEES, RETAINERS	(b) REIMBURSEMENT OF EXPENSES	(c) ADVANCES OR OTHER PAYMENTS (Attach Explanation)	(d) TOTAL THIS PERIOD	(e) CUMULATIVE TOTAL TO DATE
	W. J. Keese	889.16	120.80	-	1,009.96	5,889.31
	A. J. Shults	1,796.12	627.32	-	2,423.44	14,249.48
	R. E. Shaw	7,265.00	1,518.97		8,783.97	58,569.21
	F. M. Pownall)					
	R. E. Ratcliff)				9,800.00	41,000.00

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on 1/30/78 at Los Angeles, Calif.
(DATE) (CITY AND STATE)

[Signature]
(SIGNATURE OF FILER OR AUTHORIZED AGENT)
LAWRENCE J. STRAW, JR.

C
D
E
F

Part 1 - (Continuation)

F. M. Pownall)
J. E. Balluf) *
R. E. Ratcliff)

* Payment made to:

Landels, Ripley & Diamond
450 Pacific Avenue
San Francisco, CA 94133

Part 2 (i)(c)(*) - (Continuation)

Susan B. Hamson
Secretary
100%

PART 2 -- PAYMENTS TO INFLUENCE LEGISLATIVE OR ADMINISTRATIVE ACTION (Other than to a Lobbyist)

"Payments to influence legislative or administrative action" (Gov. Code Section 82045) include but are not limited to payment of expenses incurred by you on behalf of or in support of the lobbyist or his activities, gifts, including gifts of food and beverages to elective state officials, legislative officials, agency officials and their immediate families and include also any payments made by you in connection with direct communications with any such persons or in connection with urging others to enter into direct communications with such persons. Compensation to your employees and the cost of your own facilities utilized in such communications may have to be reported. (See Instruction Manual and FPPC Regulations) Payments of \$25 or more (other than to your own employees) must be itemized.

Schedule i:

Payments of expenses incurred by the employer for the benefit or assistance of an employed lobbyist, and payments for or in connection with communicating directly or for or in connection with urging others to communicate directly with elective state officials, legislative officials or agency officials for the purpose of influencing legislative or administrative action.

a: Payments aggregating \$25 or more this period for services provided by other than the filer or the filer's employees:

DATE	NAME AND ADDRESS OF PAYEE	DESCRIPTION OF CONSIDERATION	AMOUNT
11/77	Sacramento Executive Services 925 "L" Street Sacramento, CA 95814	Rent, Xerox	737.20
12/77	Sacramento Executive Services 925 "L" Street Sacramento, CA 95814	Rent, Xerox	942.30
11/77	Union Oil Co. of Calif. 641 South Boylston Street Los Angeles, CA	Pro rata share of fee for Donald Stewart, legal asst. to A. J. Schults	68.59
11/77	Pasadena Research Institute 770 S. Arroyo Parkway Pasadena, CA 91105	Research Report on Environmental & Economic Impact of Service Station Vapor Recovery	3,000.00

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

Total \$ 4,748.09

b. Payments aggregating less than \$25 this period for services provided by other than the filer or the filer's employees (need not be itemized) \$ 95.00

c. Payments for costs incurred within the filer's own organization:

Gross compensation of employees paid less than \$1,000 this period \$ 170.00 *

Gross compensation of employees paid \$1,000 or more this period \$ 1,193.00 (*)

Other overhead incurred by filer (need not be itemized) \$ 160.00

Total \$ 1,523.00

* Attach list showing names, titles and amount attributable to each person.

PART 4 - EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elective state officials, legislative officials, certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.
	Mobil is an integrated petroleum and chemical company, which sells goods and services to the public directly, through consignees, distributors, and independent businessmen. Additionally, Mobil Oil Estates (Redwood) Limited, Mobil Oil Estates (Services) Limited, and Mobil Oil Estates (Blair Island Investments) Limited are real estate companies involved in the investment, development, planning, purchase, and sale of real estate dealing with the public directly, through contractors, property owners and others. Over the course of the year, it is possible, as it is with any member of the public, that any or all elective state officials, dealt with Mobil or purchased Mobil goods or services, in the ordinary course of business, on terms available to the general public, in an amount exceeding \$1,000.00 in value. At the present time, Mobil is unaware of any such particular exchange with any member of the enumerated class of individuals.			

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

- WITH BUSINESS ENTITY (Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)
If \$1,000 or more in a calendar year

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED
	Mobil is an integrated petroleum and chemical company which sells goods and services to the public directly, through consignees, distributors and independent businessmen. Mobil Oil Estates, Limited, Mobil Oil Estates (Redwood) Limited, Mobil Oil Estates (Services) Limited, and Mobil Oil Estates (Blair Island Investments) Limited, are real estate companies involved in the investment, development, planning, purchase, and sale of real estate dealing with the public directly, through contractors, property owners, and others. Additionally, Mobil purchases goods and services from innumerable suppliers, contractors, vendors, tradesmen, etc. Over the course of a year, it is possible that a business entity in which an official or candidate has more than a 50% ownership interest will be involved in a business transaction equivalent or exceeding \$1,000.00 with Mobil in the ordinary course of business. At the present time, Mobil is unaware of any such particular exchange with any member of the enumerated class.				

4. 10. 1976



Form 61A
LOBBYIST

**LOBBYIST ACTIVITY
AUTHORIZATION**
(GOVERNMENT CODE SECTION 86101)

RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
DEC 23 1976

MICHAEL FONG SU, Secretary of State
[Signature]

I hereby authorize CALIFORNIA ADVOCATES, INC. - Robert J. Beckus and Loren V. Smith of
(NAME OF LOBBYIST)

925 L Street, Suite 380, Sacramento, Ca. 95814 to engage in the activities of a
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

THE ADAMSON COMPANIES
(NAME OF EMPLOYER)

12381 Wilshire Boulevard, 2d floor
Los Angeles, Ca. 90025
(ADDRESS)

for until terminated
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on 1 December 20, 1976
(DATE)

at Los Angeles, Ca.
(CITY AND STATE)

by *[Signature]*
(SIGNATURE)

Title *[Signature]*
(RELATIONSHIP TO EMPLOYER)



**REPORT OF LOBBYING EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

RECEIVED
AND FILED
In the Office of the Secretary of State
of the State of California
JAN 20 1978

FORM 650

Period 12 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

MARCH TONG EU, Secretary of State
H. D. - SACTO. *mh*
H/mh

THE ADAMSON COMPANIES
FULL NAME OF FILER

12381 Wilshire Boulevard, 2d floor, Los Angeles, Ca. 90025
BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)

213/828/4533 95-2191161 **A**
BUSINESS PHONE (INCLUDE AREA CODE) FEDERAL EMPLOYER IDENTIFICATION NO. FOR OFFICIAL USE ONLY

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
None		

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS
PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)	
OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	SALARIES, FEES, RETAINERS	REIMBURSEMENT OF EXPENSES	ADVANCES OR OTHER PAYMENTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
						NONE

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on 1-12-78 at Los Angeles, Ca.
(DATE) (CITY AND STATE)

by Shirley Mary Hill
(SIGNATURE OF FILER OR AUTHORIZED AGENT)
General Partner

ORIGINAL

C

D

E

F

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Certain exchanges with candidates, elective state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual at Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.
	NONE			

TACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

WITH BUSINESS ENTITY (Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)
If \$1,000 or more in a calendar year

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED
	NONE				

TACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS



Form 61A
LOBBYIST

LOBBYIST ACTIVITY
AUTHORIZATION

(GOVERNMENT CODE SECTION 86101)

Also Received
RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
JAN 13 1977
MARSH FONDA EU, Secretary of State

I hereby authorize K. A. Ross, Jr.
(NAME OF LOBBYIST)

1131 Ocean Avenue, Santa Monica, California
(ADDRESS) to engage in the activities of

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of
CONTINENTAL HELLER CORPORATION and SWINERTON & WALBERG CO., a Joint Venture
(NAME OF EMPLOYER)

555 Capitol Mall
Sacramento, California 95814
(ADDRESS)

For Duration of Contract
for _____
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on January 10, 1977
(DATE)

at Sacramento, California
(CITY AND STATE)

CONTINENTAL HELLER CORPORATION
by *M. J. Heller*
M.J. Heller (SIGNATURE)

Title Chairman
(RELATIONSHIP TO EMPLOYER)

SWINERTON & WALBERG CO.
By: *W. A. Swinerton*
W. A. Swinerton

Title: Chairman



**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

**RECEIVED
AND FILED**
In the office of the Secretary of State
of the State of California
JAN 11 1978

FORM 650

Period 12/1/1977 through 12/31/1977

Cumulative Period 1/1/1977 through 12/31/1977

MARCH FONG EU, Secretary of State
[Signature]

CONTINENTAL HELLER CORPORATION and SWINERTON & WALBERG CO., A Joint Venture

FULL NAME OF FILER
555 Capitol Mall, Sacramento, California 95814

BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)
(916) 444-7980 94-2303542 A

BUSINESS PHONE (INCLUDE AREA CODE) **FEDERAL EMPLOYER IDENTIFICATION NO.** **FOR OFFICIAL USE ONLY**

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION ACTIVELY INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
	To act on behalf of the filer as a liaison with the Joint Rules Committee, which will administer the contract between the State of California and the filer for the restoration of the State Capitol.	RECEIVED JAN - 9 '78

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS
PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	(a) SALARIES, FEES, RETAINERS	(b) REIMBURSEMENT OF EXPENSES	(c) ADVANCES OR OTHER PAYMENTS (Attach Explanation)	(d) TOTAL THIS PERIOD	(e) CUMULATIVE TOTAL TO DATE
	K.A. Ross, Jr.	\$2000 mo.			\$2000	\$24,000

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

CONTINENTAL HELLER CORPORATION and
SWINERTON & WALBERG CO., a Joint Venture

Executed on 1-6-78 at San Francisco
(DATE) (CITY AND STATE)

by *[Signature]*
(SIGNATURE OF FILER OR AUTHORIZED AGENT)

PART 4 - EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elective state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.
	NONE			

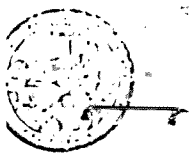
ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

- WITH BUSINESS ENTITY (Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)
If \$1,000 or more in a calendar year

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED
	NONE				

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS



LOBBYIST ACTIVITY
AUTHORIZATION

Form 61A
LOBBYIST

(GOVERNMENT CODE SECTION 86101)

HO Sac mra

I hereby authorize VICTOR F. STEFAN
(NAME OF LOBBYIST)

925 L Street, Suite 1485 Sacramento, Ca. to engage in the activities
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of

Browning - Ferris Industries of No. Calif. 1995 Old Oakland Road
(NAME OF EMPLOYER) (ADDRESS)
San Jose, Ca. 95131

of 1977 - 78 Legislative Session
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on May 9, 1977
(DATE)

at San Francisco, California
(CITY AND STATE)

by *Alb. P. Spencer*
(SIGNATURE)

Title *President*
(RELATIONSHIP TO EMPLOYER)



**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

RECEIVED
AND FILED
In the office of the Secretary of State
of the State of California
JAN 23 1978
MARCH FONG EU, Secretary of State
H. D. - SACTO. *mk*

FORM 650

Period 11 / 1 / 1977 through 12 / 31 / 1977

Cumulative Period ___ / ___ / 197__ through 12 / 31 / 1977

Browning - Ferris Industries of California and

* Browning - Ferris Industries of No. California

Handwritten notes:
4/11/78
4/11/78
4/11/78

FULL NAME OF FILER

1995 Old Oakland Road

San Jose, Ca.

95131

BUSINESS ADDRESS (NO. AND STREET)

(CITY)

(STATE)

(ZIP CODE)

(408) 867 - 7020

94-0838350

A

BUSINESS PHONE (INCLUDE AREA CODE)

FEDERAL EMPLOYER IDENTIFICATION NO.

FOR OFFICIAL USE ONLY

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION ACTIVELY INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
Legis. Recess		

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)	
OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	SALARIES, FEES, RETAINERS	REIMBURSEMENT OF EXPENSES	ADVANCES OR OTHER PAYMENTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	Victor F. Stefan	2,500.00	-0-	-0-	2,500.00	10,114.13

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C)

NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on January 20, 1978 at San Jose, Ca.

(DATE)

(CITY AND STATE)

by *[Signature]*

(SIGNATURE OF FILER OR AUTHORIZED AGENT)

PART 4—EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elective state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

— WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.
	None			

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

— WITH BUSINESS ENTITY (Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)
If \$1,000 or more in a calendar year

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED
	None				

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS



Form 61A
LOBBYIST

W

**LOBBYIST ACTIVITY
AUTHORIZATION**
(GOVERNMENT CODE SECTION 86101)

RECEIVED
AND FILED
In the office of the Secretary of
of the State of California
DEC 17 1976
MARCH FONG ELL Secretary of State

I hereby authorize Harold S. Lentz of
(NAME OF LOBBYIST)
Southern Pacific Transportation Company
Southern Pacific Building, One Market Plaza
San Francisco, CA 94105 to engage in the activities of a
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf of
Southern Pacific Transportation Company Southern Pacific Bldg., One Market
and Affiliated Companies Plaza, San Francisco, CA 94105
(NAME OF EMPLOYER) (ADDRESS)

for indefinite
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on December 10, 1976
(DATE)

at San Francisco, CA
(CITY AND STATE)

by *Alau...*
(SIGNATURE)

Title Executive
Vice President - Law
(RELATIONSHIP TO EMPLOYER)



**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

Rij
**RECEIVED
AND FILED**
In the office of the Secretary of State
of the State of California
JAN - 9 1978
MARCH FONG EU, Secretary of State

FORM 650

Period 12 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

Southern Pacific Company and Affiliated Companies

FULL NAME OF FILER

Southern Pacific Building, One Market Plaza, San Francisco, CA 94105

BUSINESS ADDRESS (NO. AND STREET)

(CITY)

(STATE)

(ZIP CODE)

(415) 362-1212

94-1694287

A

BUSINESS PHONE (INCLUDE AREA CODE)

FEDERAL EMPLOYER IDENTIFICATION NO.

FOR OFFICIAL USE ONLY

LOBBYING ACTIVITIES:

SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD

AGENCY INVOLVED

Application Nos. 56666, 56874

California Public Utilities Commission

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)	
OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	SALARIES, FEES, RETAINERS	REIMBURSEMENT OF EXPENSES	ADVANCES OR OTHER PAYMENTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	Harold S. Lentz	\$2,291	none	\$76.90	\$2,367.90	\$19,705.40

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C)

NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on **1/5/78**
(DATE)

of **San Francisco, CA**
(CITY AND STATE)

by *[Signature]*
(SIGNATURE OF FILER OR AUTHORIZED AGENT)

PART 4 - EXCHANGES OF MONEY OR OTHER THINGS OF VALUE (Amounts may be rounded off to whole dollars)

Certain exchanges with candidates, elected state officials, legislative officials and certain agency officials and members of their immediate families must be reported. (For examples see Instruction Manual and Title 2, Cal. Ad. Code 18650)

- WITH INDIVIDUAL (Elective, legislative or agency official or candidate and members of their immediate family) if exchange is more than \$1,000, or in the case of wages if more than \$1,000 a calendar year

DATE	NAME AND OFFICIAL POSITION OF RECIPIENT *	NATURE OF THE EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE REC'D.

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

***If the exchange is with a member of immediate family of an official or candidate, provide the information for both the family member and the official or candidate and state the relationship.**

- WITH BUSINESS ENTITY
If \$1,000 or more in a calendar year

(Business in which the official or candidate has more than 50% ownership interest or in which he is the proprietor, partner, director, officer or manager.)

DATE	NAME AND ADDRESS OF BUSINESS ENTITY	NAME OF OFFICIAL OR CANDIDATE AND GOVERNMENTAL POSITION	NATURE OF EXCHANGE	MONETARY VALUE GIVEN	MONETARY VALUE RECEIVED

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

Attachment - Period 12/1/77 through 12/31/77

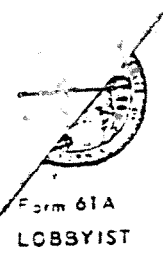
Explanation With Respect To Items Identified With An Asterisk (*).

1. It is assumed that to influence or attempt to influence administrative action requires a "communication" with regard to a "proceeding." Thus, only "proceeding" numbers which have been the subject of communications (including agreeing to hearing dates, filing pleadings, etc.) are listed. None of the proceedings are rate making proceedings in the usual sense of the term. However, the question of whether other proceedings before the Public Utilities Commission are "quasi-legislative" or "quasi-judicial" is often a difficult question which has only been partially clarified by regulations issued to date and which may be subject to dispute in many instances. To be conservative, in all questionable cases the proceeding has arbitrarily been treated as being quasi-legislative and some or all of the proceedings listed may actually be entirely judicial in nature. For this reason, much or all of the amounts shown for payments received and payments made may actually be erroneously reported because not in any way connected with attempts to influence "administrative action".

2. In Column (a) on page 1, salary has been allocated by computing the number of days covered by the report, excluding Saturdays and Sundays (but not excluding holidays, vacation days or days not worked because of illness) and, assuming that each day is a 7-1/2 hour day, dividing the total into the hours expended in "connection", directly or indirectly, with what might possibly be considered to be lobbying activities to obtain a percentage which, in turn, was applied to the salary received for the period covered by the report. This appears to be the only reasonably practical method and almost certainly allocates a larger portion of salary to "lobbying" than is actually the case.

3. All amounts shown in Column (c) on page 1 are either advances or airline tickets (a personal maintenance expense) charged directly to the employers account. In addition to salary and advance(s) shown under Columns (a) and (c), on page 1, other various fringe benefits were received, such as medical insurance, etc., the value of which is impossible and impractical to calculate or obtain for purposes of the lobbyist report and therefore have not been included. Also since only a portion of my time as an attorney-at-law is spent in activities related to the handling of proceedings before the California Public Utilities Commission, the amount shown as an advance is an allocated portion of total advances based upon estimate of amount reasonably necessary to cover personal expenses to be incurred.

4. To the extent possible, all disbursement items are posted and reported according to date incurred rather than date paid. Personal maintenance expenses, including reimbursement for use of personal automobiles, are reported in amounts reimbursed by employer since no other possible or practical method is available and any attempt to use any other basis would result in providing less accurate information.



LOBBYIST ACTIVITY
AUTHORIZATION

(GOVERNMENT CODE SECTION 86101)

RECEIVED
OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF CALIFORNIA

JAN 4 - 1977

ARCH FONG EU. Sr. State

H/p Sac of

I hereby authorize William J. Keese, An Individual Employed by William J. Keese, Inc
(NAME OF LOBBYIST)

925 L Street, Suite 350, Sacramento, CA 95814 to engage in the activities of
(ADDRESS)

LOBBYIST as defined in Title 9, Chapter 2, Section 82039 of the California Government Code on behalf
CONTINENTAL OIL COMPANY and its wholly-owned subsidiary
DOUGLAS OIL COMPANY OF CALIFORNIA
(NAME OF EMPLOYER)

1755 Glenarm Place
Denver, Colorado 80202
(ADDRESS)

for an indefinite period.
(PERIOD OF AUTHORIZATION, IF KNOWN)

Executed on November 22, 1976
(DATE)

at Denver, Colorado
(CITY AND STATE)

by *A T Smith*
A. T. Smith (SIGNATURE)

Title Attorney
(RELATIONSHIP TO EMPLOYER)

**REPORT OF LOBBYIST EMPLOYERS OR PERSONS SPENDING
\$250 OR MORE A MONTH TO INFLUENCE LEGISLATIVE
OR ADMINISTRATIVE ACTION**

FORM 650

Period 12 / 1 / 1977 through 12 / 31 / 1977
Cumulative Period through 12 / 31 / 1977

**RECEIVED
AND FILED**
In the Office of the Secretary of State
of the State of California
FEB - 2 1978
PM 7/31/78
MURCH FONG ELL Secretary of State
[Signature]

Continental Oil Company and its wholly owned subsidiary, Douglas Oil Company
FULL NAME OF FILER
 5 Greenway Plaza Houston Texas 77046
BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)
 713-965-1000 73-0196000 A
BUSINESS PHONE (INCLUDE AREA CODE) **FEDERAL EMPLOYER IDENTIFICATION NO.** **FOR OFFICIAL USE ONLY**

LOBBYING ACTIVITIES:	SPECIFIC DESCRIPTION OF LEGISLATIVE (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE THIS PERIOD	AGENCY INVOLVED
	AB 616, 807, 842, 944, 1043; SB 739	California legislation

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS
PART 1 - PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)	
OFFICIAL USE ONLY	FULL NAME OF LOBBYIST	SALARIES, FEES, RETAINERS	REIMBURSEMENT OF EXPENSES	ADVANCES OR OTHER PAYMENTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	A. J. Shults	462.92	124.74		587.66	7,285.87

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

IS THIS THE FIRST REPORT FOR THIS CALENDAR YEAR? (Check applicable box)

YES (Attach Schedule C) NO

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

Executed on _____ at _____
 (DATE) (CITY AND STATE)

[Signature]
 by _____
 (SIGNATURE OF FILER OR AUTHORIZED AGENT)

"Payments to influence legislative or administrative action" (Gov. Code Section 82045) include but are not limited to payment of expenses incurred by you (or) on behalf of or in support of the lobbyist or his activities, gifts, including gifts of food and beverages to elective state officials, legislative officials, agency officials and their immediate families and include also any payments made by you in connection with direct communications with any such persons or in connection with urging others to enter into direct communications with such persons. Compensation to your employees and the cost of your own facilities utilized in such communications may have to be reported. (See Instruction Manual and FPPC Regulations) Payments of \$25 or more (other than to your own employees) must be itemized.

Schedule i:

Payments of expenses incurred by the employer for the benefit or assistance of an employed lobbyist, and payments for or in connection with communicating directly or for or in connection with urging others to communicate directly with elective state officials, legislative officials or agency officials for the purpose of influencing legislative or administrative action.

a: Payments aggregating \$25 or more this period for services provided by other than the filer or the filer's employees:

DATE	NAME AND ADDRESS OF PAYEE	DESCRIPTION OF CONSIDERATION	AMOUNT
12/77	W. J. Keese, Inc. 925 L Street, Suite 350 Sacramento, CA 95814	Retainer and expenses for December; pro rata billing	\$ 293.00
* 9/77	Western Oil & Gas Association 609 South Grand Avenue Los Angeles, CA 90017	Pro rata billing for SO ₄ litigation pre- paration costs to date	13.96
*	Not previously reported on September report because paperwork was not processed until this time.		

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS Total: \$ 306.96

b. Payments aggregating less than \$25 this period for services provided by other than the filer or the filer's employees (need not be itemized) \$ _____

c. Payments for costs incurred within the filer's own organization:
 Gross compensation of employees paid less than \$1,000 this period \$ _____
 Gross compensation of employees paid \$1,000 or more this period \$ _____ (*)
 Other overhead incurred by filer (need not be itemized) \$ _____

* Attach list showing names, titles and amount attributable to each person. Total \$ _____

a. Payments aggregating \$25 or more this period:

DATE	NAME AND ADDRESS OF PAYEE	DESCRIPTION OF BENEFITS NAME AND OFFICIAL POSITION OF BENEFICIARY*	AMOUNT (if \$25 or more)
12/13/77	Ellis Restaurant	Luncheon	\$ 46.84
	10th & L Streets	Guests: Mark Hogan and Vir.	
	Sacramento, CA 95814	Youngman of Calif. Research;	
		Mr. Mrs. J. Gonsalves,	
		lobbyist; Terry Stewart,	
		Assemblyman's Asst. and	
		Hyle Otten, host, of	
		Continental Oil Company	

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

Total \$ 46.84

b. Payments aggregating less than \$25 this period (need not be itemized) Total _____

* Attach list showing names, titles and amount attributable to each person.

SUMMARY AND RECAPITULATION

	Total Payments
Payments described in Part 2, Schedule i(a)	\$ _____
Payments described in Part 2, Schedule i(b)	\$ _____
Payments described in Part 2, Schedule i(c)	\$ _____
Payments described in Part 2, Schedule ii(a)	\$ _____
Payments described in Part 2, Schedule ii(b)	\$ _____
TOTAL THIS PERIOD	\$ _____

PART 3 - CAMPAIGN CONTRIBUTIONS: STATE AND LOCAL *

DATE	NAME OF RECIPIENT	I.D. NUMBER (If Committee)	AMOUNT
	None		

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

Disclosure in this report does not relieve a filer of any obligation to file the campaign reports required by Section 84200 seq. of the Government Code.