

86202

Memorandum

To : Opinion Request Participants

Date : Nov. 9, 1978

M-78-247

From : FAIR POLITICAL PRACTICES COMMISSION
Natalie West

Subject: Government Code Section 86202

A lobbyist delivered a check from his employer to an assemblyman's campaign committee. The committee records include a Xerox copy of the check and the lobbyist's calling card.

Is this conduct sufficient to constitute arranging for the making of a contribution in violation of Section 86202? Assume the lobbyist was not involved in the recommendation or decision-making process.

NW:plh

It was the staff view that the conduct described above constitutes a violation of Section 86202 by the lobbyist and Section 86204 by the committee. However, the enforcement proceeding should be held in abeyance until IGA is decided.