

State of California



Fair Political Practices Commission

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

March 7, 1979

79-011

Mr. Matt Brodie
Modesto Board of Realtors
422 McHenry Avenue
Modesto, California 95354

Dear Mr. Brodie:

This letter is to confirm our telephone conversation of February 20, 1979.

You stated that the Modesto Board of Realtors does not make direct political contributions to candidates or committees but does so through an established state political action committee. You also stated that there was a local ballot measure that the Modesto Board of Realtors was very interested in and wanted to become involved by making a political contribution of approximately \$500 to \$1,00 direct to the ballot measure committee without going through the state PAC. The monies for this contribution would be allocated from the Board's general fund. You informed me that the Modesto Board of Realtors received its money from voluntary contributions from its membership and that once a year the members are requested to send their political contributions direct to the state PAC. You asked what reporting obligation the Modesto Board of Realtors would incur if they made such a contribution to the local ballot measure?

At the suggestion of Regina Kutchins in our Sacramento office, I spoke with Barbara Campbell, an attorney in our Legal department, and I relayed the following information to you concerning your question. Our office advised that the Modesto Board of Realtors may not have a filing obligation until \$5,000 of political contributions are made in this calendar year. Government Code Section 82013. However, Barbara Campbell did strongly urge that you speak with the state PAC's attorney regarding rules, regulations and possible restrictions of the Modesto Board of Realtors to become directly involved with a political campaign.

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If you should have any questions concerning this matter, you may contact Barbara Campbell at (916) 322-5901.

Sincerely,



Helen P. Andino
Special Compliance
Representative

HPA:jg