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# SAN FRANCISCO REDEVELOPMENT AGENCY

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July 24, 1979

REFER TO:

103-52979-008

Dwight Dickerson, Esq.  
FAIR POLITICAL PRACTICES COMMISSION  
P. O. Box 807  
Sacramento, CA 95804

79-044

Dear Mr. Dickerson:

This is to confirm our telephone conversation of July 20, 1979, in which you informed me that the test of whether or not a business entity is "doing business" in a jurisdiction (and is, therefore, a "reportable source" of income under our Conflict of Interest Code) is based upon the nature and the location of the work done by the entity, not on the location of the entity's clients. For example, if an Oakland business entity performs services for a client with offices in both Oakland and San Francisco, and the services relate solely to the client's Oakland activities, the business entity is not "doing business" in San Francisco, notwithstanding the fact that the client may otherwise be doing business in San Francisco. On the other hand, if an Oakland business entity performs services for a client with offices in Oakland alone, but the services performed relate to purchase of property in San Francisco, the business may be deemed to be "doing business" in San Francisco.

Thank you again for your advice and guidance in this area. I really appreciate the assistance you have given me in interpreting various requirements of the Political Reform Act.

Very truly yours,

DAVID J. OSTER  
Attorney at Law

