

79-051

January 4, 1979

John Gilchrist
11th & "L" Building, Suite 1003
Sacramento, California 95814

Dear Mr. Gilchrist:

This letter will confirm our telephone conversation of December 22, 1978. During that conversation and in your letter dated December 14, 1978, you indicated that the Western Region of the Society of the Plastics Industry, Inc. (Society) will hold a reception in Sacramento so that members of the Plastics Industry can get acquainted with legislators and agency officials. The costs to be incurred by the Society will include payment for employees' transportation and lodging and a reception for the legislators and agency officials. The Society is not an employer of a lobbyist. You asked about the reporting obligation of the Society.

Based on the facts you have presented, all payments by the Society for the reception are payments for or in connection with direct communication with legislative or agency officials within the meaning of Government Code Section 82045(d) and since those payments will exceed \$250 in a month they must be reported by the Society on Form 650.

Payments for employee transportation and lodging are payments for or in connection with direct communication with an elected state official, legislative official or agency official within the meaning of Government Code Section 82045(d) and must be reported as payments to influence legislative or administrative action.

Compensation paid to employees of the Society may also be reportable as a payment to influence legislative or administrative action if the employees spend 10% or more of their compensated time in one month on the reception.

You further indicated that the entire cost of the "goodie" bag provided to ladies who attend the reception would be incurred by plastics industry members. Therefore, the Society has no reporting obligation with respect to those items.

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

Sincerely,

J. Richard Eichman
Compliance Representative

79051

JOHN GILCHRIST ASSOCIATES

LEGISLATIVE RELATIONS

11TH AND L BLDG.
SACRAMENTO, CALIF. 95814
447-4068

3670 5 12 11 18
December 14, 1978

J. Richard Eichman
P. O. Box 807
Sacramento, California 95804

Dear Mr. Eichman:

This is in reference to our recent conversation regarding a reception for members of the Legislature to be sponsored by various facets of the plastics industry in California.

Although the sponsors are members of the Western Region of the Society of the Plastics Industry, Inc., each individual member is paying his own transportation and lodging to Sacramento to attend the affair.

This event is non-political, and not legislatively oriented, but is an educational get-acquainted affair. Members of the industry will have an opportunity to meet at the Capitol with their individual legislators from their respective districts. Administrative officers and agency secretaries will be included in those invited. Ladies attending the reception will be given a "goodie" bag containing inexpensive items manufactured by industry members.

Our object in giving you this background is to inform you of what we are planning. We hope to have the reception early in February.

If you see any objection to this plan, I hope you will communicate your thoughts to us as soon as possible.

Sincerely,

John P. Gilchrist
John P. Gilchrist

JPG/bd