

State of California

Memorandum

To : Opinion Request Meeting Participants

Date : June 29, 1979

M-79-147

From : **FAIR POLITICAL PRACTICES COMMISSION**
Lee C. Rosenthal

Subject: Lobbyist Employers

Seven title insurance companies wish to lobby a bill. They hire a law firm which, in turn, hires a lobbying firm to represent the interests of the title companies. The actual lobbyist, of course, is an employee of the lobbying firm.

Under 2 Cal. Adm. Code Section 18619, I believe that both the law firm and the lobbying firm are retained entities and that the title insurance firms are employers of a lobbyist. If this is not the case, then so long as the title insurance firms paid less than \$250 a month there would be nothing to associate the title firms with the lobbying effort and the law would be effectively evaded.

LCR:plh

7/2/79

Staff Advice:

The law firm and the seven title insurance companies are employers of a lobbyist under 2 Cal. Admin. Code Section 18619(b). This decision is based upon the staff's opinion that the title insurance companies intended to employ a lobbyist and retained the law firm only for that purpose.