

September 23, 1980

Ms. Sheryl R. Falstein
Jack McGrath and Associates
1100 Glendon Avenue, Suite 1721
Los Angeles, CA 90024

Dears Ms. Falstein:

This letter is in response to your request for written confirmation of advice I provided to you by telephone.

During our telephone conversation, and in your letter of September 8, 1980, you stated that Jack McGrath and Associates was retained by a client to provide public relations and campaign consulting services. The funds expended by your organization amounted to \$500 or more and the single source of these funds was your client who did not solicit or raise funds from any other source.

You asked for advice, based on the above facts, regarding the reporting obligations under the Political Reform Act.

I advised you that your client is a committee pursuant to Government Code Section 82013 (b) and that he is required to file appropriate campaign disclosure statements (Form 461). Further, I advised you that Jack McGrath and Associates is an agent or independent contractor, pursuant to Government Code Section 84303, for your client, and Jack McGrath and Associates should provide your client with an itemization of your expenditures so your client could report them in the same manner as if he made those expenditures directly.

If you have further questions, please contact me.

Yours Truly,

John C. Greenwood
Consultant