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Submission

JUL 10 1 18 PM '81

July 8, 1981

A-81-165

Ms. Mary Lou Rushing
Republican Central Committee
777 South Main, Suite 200
Orange, California 92668

Dear Ms. Rushing:

This letter is to confirm my advice to you during our telephone conversation this date.

The facts as I understand them to be are as follows:
A member of the County Republican Central Committee wrote a personal check to pay for printing goods received by this person for the County Central Committee. The member was reimbursed by another person who was, in turn, reimbursed by the state organization of the Republican party.

The question you asked was since the County Central Committee received an in-kind contribution from the State Republican Party organization and will report the contribution as coming from the state organization, is it necessary to report the two individuals that wrote personal checks for the transaction as intermediaries?

I advised that both individuals that wrote their own personal checks and were ultimately reimbursed by the state organization of the Republican party must be reported as "intermediaries" pursuant to Government Code Section 84302.

I hope this information has been helpful to you. Please let me know if I can be of any further assistance.

Sincerely,

Helen P. Arriola
Political Reform
Consultant

HPA:jg