

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • 1100 K STREET BUILDING, SACRAMENTO, 95814
107 SOUTH BROADWAY • • • SUITE 7007 • • • LOS ANGELES, 90012

May 26, 1981

A-81-167

Ms. Shirley Wechsler
11783 Laurelcrest Drive
Studio City, California 91604

Dear Shirley:

Pursuant to your request, this letter is to verify my advice to you during our telephone conversation of May 13, 1981.

The facts as I understand them are as follows:

1. There are several small local labor unions and organizations that wish to make a contribution to a particular fundraiser event for one of your clients.
2. Many of these small locals and groups do not have a separate political arm or political action committee.
3. Some of the small local unions and groups have had very little, if any, political activity in the past. Others have had no political activity. An example of the limited political activity that you described was perhaps a single contribution one, two or even three years ago.

The question you asked was, whether or not these local unions and organizations would incur any filing obligation under the Political Reform Act (Act) if they made a contribution to your client's fundraiser?

There are two answers to your question. Specifically addressing those local unions and groups which have never made any political contribution or expenditure as defined by Government Code Sections 82015 and 82025 respectively^{1/}, the answer is clear. These local unions and groups will qualify as a "Major Donor" committee pursuant to Government Code Section 82013(c) once they make a total of five thousand dollars (\$5,000) in contributions in any calendar year and will be required to file periodic major donor campaign statements as required by the Act during 1981.

^{1/} All statutory references are to the Government Code unless otherwise noted.

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For those local unions and organizations which have made even a single political contribution in the past, they will be required to file as a recipient committee (Code Section 82013(a)) since the contributions made in prior years were from funds which were received from members of the union or organization. Therefore, members contributing to these funds have reason to know that a portion of these funds may be used for political purposes based on established practice of periodically making political contribution no matter how small or infrequently made by the labor union or organization.

I hope this information has been helpful to you. If I can be of any further assistance, please do not hesitate to contact our office.

Sincerely,



Helen P. Arriola
Political Reform
Consultant

HPA:jg