

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

April 9, 1981

A-81-174

Mr. George Paul
BOILERMAKERS, LODGE 92
4809 East Firestone Boulevard
South Gate, California 90280

Dear Mr. Paul:

This letter is to confirm advice given to you in my office on March 30, 1981.

The facts as you relayed them to me are as follows:

1. Each lodge of the Boilermakers Union does not make contributions or any political independent expenditure.
2. All contributions and expenditures will be made by the International Union of Boilermakers. The International is located out-of-state.
3. Funds used for these political contributions and expenditures will be raised by the local lodges by various means, i.e. sale of hats, buttons, raffles, etc.
4. The lodges conducting the sales will deduct their expenses and forward the balance of the funds raised to the International for reporting purposes.

The question you posed is what filing obligations are incurred by the lodges and the International Union?

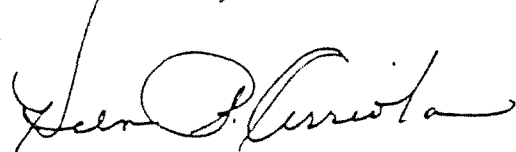
I advised that since the local lodges are merely acting as "agents" for the International, they will not incur any filing obligation as long as the International completely reports all of the contributions received by the lodges and all contributions or expenditures made to California state and local officeholders, candidates, their committees or ballot measure committees.

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The International Union must file a Statement of Organization, Form 410 with the Secretary of State's office in California within ten days of receiving \$500 in contributions allocated for California campaigns. (Government Code Section 84101). Periodic campaign statements are then required to be filed by the International's general purpose recipient committee pursuant to Government Code Section 84200. Form 420, Recipient Committee Long form is to be filed with the Secretary of State (original plus one copy), Los Angeles County Registrar-Recorder (two copies) and San Francisco County (two copies). Government Code Section 84211 requires that each donor be identified by name, street address, occupation, employer date and amount received, and the cumulative amount of contributions. Therefore, the local lodges raising the funds are required to maintain adequate records of their fundraising events in order to provide the International with the necessary required information for the required campaign statements. (Government Code Section 84104). Detailed information on when and where to file the campaign statements is contained in the 1981 Informational Manual on pages 4 and 10. A copy of the Manual has been enclosed for your use.

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

Sincerely,



Helen P. Arriola
Political Reform
Consultant

HPA:jg

Enclosures: (5)