



California Fair Political Practices Commission

May 13, 1986

William J. Keese, Esq.
California Dental Association
Government Relations Office
818 K Street Mall
P. O. Box 13749
Sacramento, CA 95853

Re: Your Request for Advice
Our File No. A-86-124

Dear Mr. Keese:

This is in response to your letter of April 14, 1986, and to confirm my telephone advice to Brenda Proschaska regarding your registration and reporting obligations under the amended lobbying disclosure provisions of the Political Reform Act (Government Code Sections 81000-91015).

As you know, the amended lobbying disclosure provisions contain a new definition of "lobbying firm" which includes individual contract lobbyists (Government Code Section 82038.5). As stated in your letter, you are an individual contract lobbyist and have registered and will file reports as William J. Keese, Inc., a lobbying firm.

You have also stated that you are a full-time employee and lobbyist for the California Dental Association, which is not a client of William J. Keese, Inc., and have asked if you may also be registered and file reports as an employee-lobbyist for the Association.

We have concluded that you should file reports as a lobbying firm only, and report the payments you receive for lobbying from the California Dental Association on your Report of Lobbying Firm (Form 625). If desired, you may register and file reports under the name William J. Keese/William J. Keese, Inc., and may include a statement on your filings to explain that the Association is not a client of William J. Keese, Inc.

I hope this information is helpful. Please let me know if I can be of further assistance.

Sincerely,

Carla Wardlow

Carla J. Wardlow
Political Reform Consultant

CJW:cah

California Dental Association

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April 14, 1986

Colleen McGhee
Technical Assistance and
Analysis Division
Fair Political Practices Commission
428 "J" Street
Sacramento, California 95814

RE: LOBBYIST REGISTRATION

Dear Ms. McGhee:

The rules for lobbyist registration adopted for 1986 have created some confusion as to how I should be registered with and report to the Secretary of State.


As a full-time employee with all employee benefits (not under contract) and lobbyist of the California Dental Association, I am an employee of a lobbyist employer and, therefore, have registered by filing a lobbyist certification and will report on a Form 615, Lobbyist Report.

Additionally, I am an individual contract lobbyist. William J. Keese, Inc. qualifies as a lobbying firm, has registered as such and will report on Form 625, Report of Lobbying Firm.

There is no relationship between William J. Keese, Inc. and the California Dental Association. My lobbying activities for the California Dental Association and for the clients of William J. Keese, Inc. are totally separate and distinct.

Under these circumstances, I see no alternative to the manner of filing we have chosen. You have questioned this procedure and I am requesting an informal opinion from your office to clarify my obligations for reporting. If you would like further clarification of this matter, please contact Brenda Prochaska in my office. We would appreciate your advice prior to the April 30 filing deadline.

Sincerely,


William J. Keese, Esq.
Director

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