



California Fair Political Practices Commission

May 9, 1990

Michael Twombly
Twombly & Associates
1001 6th Street, Suite 501
Sacramento, CA 95814

Re: Your Request for Advice
Our File No. A-90-258

Dear Mr. Twombly:

You have requested confirmation of telephone advice provided to you concerning the lobbying provisions of the Political Reform Act. (Government Code Sections 81000-91015.)

Your letter, dated March 27, 1990, correctly states my advice that a lobbying firm which provides free lobbying services to an entity is not required to report such activities. In addition, the entity receiving free lobbying services from a lobbying firm is not required to authorize the lobbying firm or report its activities in relation to the lobbying firm. Please note, however, that if the entity qualifies as a lobbyist employer because of other activities, the entity would be required to disclose the legislative bills or state agency regulations lobbied for free by the lobbying firm. (Government Code Section 86116(d).)

A copy of your letter is enclosed for your convenience.

Please do not hesitate to contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan
General Counsel

A handwritten signature in cursive script, appearing to read "Lynda Cassady".

By: Lynda Cassady
Political Reform Consultant

Enclosure