



California Fair Political Practices Commission

June 20, 1990

Diane Fishburn
Olson, Connelly, Hagel, Fong & Leidigh
300 Capitol Mall, Suite 350
Sacramento, CA 95814

Re: Your Request for Confirmation of
Telephone Advice
Our File No. A-90-363

Dear Ms. Fishburn:

We have received your letter dated May 16, 1990 seeking written confirmation of the prior telephone advice provided to you by this agency regarding the responsibilities of your client, "Californians for Transportation Solutions sponsored by the Planning and Conservation League - Yes on Proposition 116," ("the committee") formed for the purpose of supporting an initiative measure on the June, 1990 statewide ballot, under the campaign disclosure and reporting provisions of the Political Reform Act ("the Act").¹ Your letter accurately reflects the advice given to you.

You were advised that disclosure requirements of "Proposition 105" (Sections 84501 - 84514) are applicable to lawn signs, requiring such signs to include disclosure of the Committee's major funding source(s). You were advised that the requirement of Section 84509 pertaining to the disclosure's clarity and legibility meant that the disclosure was to be visible from the street, but not necessarily as the same size or visibility as the sign's message. You were further advised that real estate lawyers, real estate developers, and real estate brokers were to be considered as three separate "industries" for purposes of Sections 84504 and 84507. Finally, you were advised that while no format or content guidelines have been promulgated concerning required disclosure pursuant to Proposition 105, the inclusion of the words "major funding source" was necessary, and that additional disclosure language (i.e., "other funding sources") was permitted provided it didn't interfere with the required disclosure message.

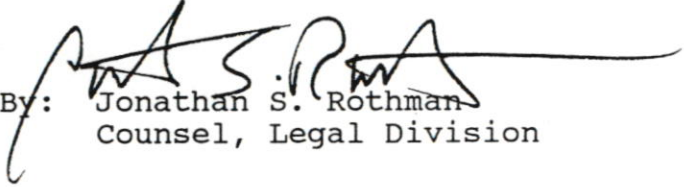
¹ Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated.

We are in the process of drafting further regulations to implement the provisions of Proposition 105. The advice you have been provided in this letter may change if the Commission adopts a regulation or regulations which reaches a different conclusion from that suggested in this advice.

I trust this letter has provided you with the guidance you requested. If you have any further questions regarding this matter, please contact me at (916) 322-5901.

Sincerely,

Scott Hallabrin
Acting General Counsel


By: Jonathan S. Rothman
Counsel, Legal Division

SH:JSR:plh