



California Fair Political Practices Commission

October 18 , 1990

Lance Olson
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-90-611

Dear Mr. Olson:

We have received your letter dated September 24, 1990 seeking written confirmation of telephone advice provided to you on September 19, 1990. That advice related to your responsibilities as treasurer for "Forest and Wildlife Protection Committee - Yes on Proposition 130" ("the committee") under the disclosure of major funding sources provisions (Proposition 105, Government Code Sections 84501-84514) of the Political Reform Act ("the Act").¹ Your letter accurately reflects the advice provided to you.

On the basis of the facts you provided, you were advised that the designation of "H.L. Arbit" as a major funding source was an appropriate disclosure under Section 84507(b), because Mr. Arbit had contributed over \$100,000 to the committee and no other person had contributed more to the committee.

Section 84507 requires disclosure of the following major funding sources, if applicable: (a) the largest "industry" contributor; (b) the "person" who is the largest contributor of \$100,000 or more; (c) "corporations" or "unions" who contribute a certain amount; and (d) out-of-state contributors. The committee has received no other contributions from investment advisors, the profession or "industry" of which Mr. Arbit is a member. It has not received any contributions from corporations or unions as a group, or out-of-state contributors. Therefore, you were advised that it was proper to designate Mr. Arbit as the committee's major funding source.

We are continuing to refine our advice concerning Proposition 105 and are in the process of drafting further regulations to implement its provisions. The advice you have been provided in this

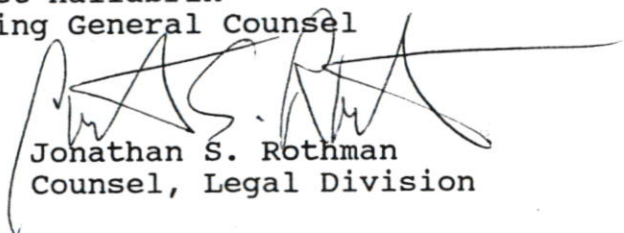
¹ Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

letter may change if the Commission adopts a regulation or regulations, or if subsequent advice is provided, which reaches a difference conclusion from that suggested in this letter.

I hope this letter has provided you with the guidance you requested. Please contact me if you have any further questions regarding this matter at (916) 322-5901.

Sincerely,

Scott Hallabrin
Acting General Counsel


By: Jonathan S. Rothman
Counsel, Legal Division

SH:JSR:plh