



FAIR POLITICAL PRACTICES COMMISSION

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June 12, 1998

Mark W. Shurtleff
Gibson, Dunn & Crutcher LLP
Jamboree Center
4 Park Plaza
Irvine, California 92614-8557

**Re: Your Request for Advice
Our File No. I-98-139**

Dear Mr. Shurtleff:

This letter is in response to your request for advice on behalf of Donald W. Murphy and Patrick Sanger regarding Section 87406 of the Political Reform Act (the "Act").¹ We are declining to provide written advice since your request for advice relates to past conduct because both Mr. Murphy and Mr. Sanger have been with the Hearst San Simeon Monument Foundation since early 1998 and because they may be limited in their activities by the permanent ban in Sections 87400 to 87405 of the Act, but you have specifically requested not to receive advice in that regard. See Regulation 18329(b)(8)(A), (b)(8)(F), (c)(4)(A), and (c)(4)(G) (copy enclosed).

If you have any other questions regarding this matter, please contact me at (916) 322-5660.

Sincerely,

Steven G. Churchwell
General Counsel

A handwritten signature in black ink, appearing to read "Marte Castaños".

By: Marte Castaños
Staff Counsel, Legal Division

SGC:MC:jlw
Enclosure

¹ Government Code sections 81000 - 91014. Commission regulations appear at title 2, sections 18109 - 18995, of the California Code of Regulations.