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August 5, 1991

Ms. Victoria N. King  
Best, Best & Krieger  
P.O. Box 1028  
Riverside, CA 92502

Re: Riverside County Publishing Company  
SR EH 23-143544  
Hearing Scheduled August 13, 1991  
Torrance (Item #10)

Dear Ms. King:

Your letter of July 11, 1991 to Ms. Janice Masterton has been referred to the legal staff for reply. You have requested that we review your description of the legal structure surrounding your client, Riverside County Publishing Company (RCPC), for the purpose of determining who must file Contribution Disclosure Statements pursuant to Section 15626 of the Government Code.

As we understand it, RCPC was acquired by Gruner & Jahr, a German entity in 1987. RCPC was subsequently transferred into a U.S. partnership, G & J Printing, which is headquartered in Minnesota. The partnership is made up of the following partners:

General Partner : U.S.A. Group, Inc.

Limited Partners: RCPC  
Brown Publishing

Arno Buchholz is Vice President of the partnership, G & J Printing, and Vice President of the general partner, U.S.A. Group, Inc. He is also an officer of Brown Publishing. Since Mr. Buchholz is an officer of the other three entities involved in the partnership, you have asked him to sign Contribution Disclosure Statements on behalf of all three entities.

In addition, you have requested Contribution Disclosure Statements from the former owners of RCPC: Robert Penprase, Georg Decker and Peter Parsons, each of whom have an interest in the outcome of this hearing and who qualify as "participant(s)" as

defined by Section 15626. Finally, Contribution Disclosure Statements will be filed by RCPC, Pat Leone, George Reyes and yourself.

We are of the opinion that under the facts you have presented, it would appear that you have obtained, or will obtain, all of the necessary Contribution Disclosure Statements from the requisite parties, participants and agents who are involved with the RCPC hearing. We are assuming as an officer of G & J Printing, the U.S.A. Group and Brown Publishing, Mr. Buchholz has the authority to file disclosures on behalf of each of these entities. We would also note that as agents of RCPC, you and George Reyes must file a Contribution Disclosure Statement on your own behalf and that of your law firm, Best, Best & Krieger. (Gov. Code § 15626(h)(4).) Mr. Leone must also file a Contribution Disclosure Statement on behalf of his CPA firm if he is employed by one. We also note that if any witnesses will be called at the hearing who would be considered "participants" under Section 15626(h)(3), a Contribution Disclosure Statement will be required. In addition, if any written materials have been submitted by any other "agents" and/or "participants", Contribution Disclosure Statements are required.

If you have further questions concerning this matter, please write this office again.

Very truly yours,

Mary C. Armstrong  
Senior Staff Counsel

MCA:wk  
3262C

CONTRIBUTION DISCLOSURE OPINION 91-25

bc: Hon. Brad Sherman  
Hon. Ernest J. Dronenburg, Jr.  
Hon. William Bennett  
Hon. Matthew K. Fong  
Hon. Gray Davis  
Ms. Cindy Rambo  
Mrs. Janice Masterton  
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