

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ••• 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance •• Administration •• Executive/Legal •• Enforcement •• Statements of Economic Interest  
(916) 322-5662 322-5660 322-5901 322-6441 322-6444

February 16, 1984

Clarice Johnson  
Office of the City Clerk  
1685 Main Street  
Santa Monica, CA 90401

File No. A-84-025

Dear Ms. Johnson:

This is to confirm my telephone advice to you of last week. You asked whether an officeholder must report receipt of free tickets to fundraisers held on behalf of other candidates or committees as "contributions" (Gov. Code Section 82015) or "gifts" (Gov. Code Section 82028). You also asked whether the officeholder has received reportable income or gifts by virtue of free attendance at a fundraiser held on his or her own behalf.

Enclosed is a copy of page 1 of the Minutes of the March 7, 1978 meeting of the Fair Political Practices Commission. Item 3 of the Minutes states the Commission's policy that receipt of such items is not reportable under the Political Reform Act (Gov. Code Sections 81000-91014). In addition, enclosed is an opinion adopted by the Commission stating that payments made on behalf of a candidate by his or her campaign committee are not reportable as income or gifts if such payments are reported as expenditures by the committee (opinion requested by Assemblyman Willie Brown, 1 FPPC Opinions 67 (No. 75-055, July 2, 1975)).

I hope this information is helpful.

Sincerely,

Handwritten signature of Carla J. Wardlow in cursive.

Carla J. Wardlow  
Political Reform Consultant

CJW:kt  
Enclosures