

Memorandum

To : Advice Files - Sections 86109, 86203,
87207, 18620

Date : April 5, 1984
No. 84-080

From : **FAIR POLITICAL PRACTICES COMMISSION**

Diane Maura Fishburn

Subject:

Lobbyist Employer Sponsoring Movie Premiere--Free Tickets to Legislators

Phil Schott and Frank Burns (lobbyists) called on behalf of their employers (Motion Picture Theatre Owners and Motion Picture Producers Associations) who are jointly sponsoring a movie premiere in Sacramento. They plan to provide five free tickets to each legislator. It is not clear what the extent of the refreshments will be; it may just be soda and popcorn or there may be a pre-premiere reception. They asked what the reporting requirements of both the legislators and their employers would be.

I advised them as follows:

1. Per the IGA opinion, they must not "arrange" the event in any way, and I explained what that prohibition means.

2. The legislators will have received a gift of the tickets (fair market value - \$5 for first run movie ticket times 5 = \$25) plus any refreshments provided (total cost of event divided by number of attendees). If these gifts (and any other gifts from these associations) add up to \$50 during the calendar year, they will be reportable on next year's SEI.

3. The lobbyist employer must report the total cost of the event as a Payment to Influence. Under the category of benefited officials, they should say "see attached" and attach a list of legislators and other officials who received free tickets and state what each received (e.g., five tickets plus the refreshments).

DMF:plh