

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ... 428 J STREET, STE 800, SACRAMENTO, 95814

Technical Assistance • • Administration • • Executive/Legal • • Enforcement  
(916) 322-5662 322-5660 322-5901 322-6441

September 6, 1985

Shirley Grindle  
Chairman, TIN CUP Campaign Reform Committee  
19051 Glen Arran  
Orange, CA 92669

Re: Campaign Disclosure Provisions  
Of The Political Reform Act  
FPPC No. A-85-177

Dear Ms. Grindle:

This is in reply to your letter dated August 5, 1985, in which you ask two questions concerning campaign expenditures.

The first question you asked, concerning the permissible use of campaign funds by an elected official, does not come within the provisions of the Political Reform Act and, therefore, we are unable to provide an answer. Elections Code Sections 12400, et seq. addresses the permissible use of campaign funds. Questions regarding an interpretation of Elections Code Section 12400 as it applies to members of the Orange County Board of Supervisors, should be addressed to the Orange County District Attorney.

With regard to your second question, concerning the purchase of inaugural tickets for a county supervisor, the Fair Political Practices Commission can provide advice only to persons whose duties under the Act are in question. Therefore, I cannot provide advice to you regarding the reporting obligations of the county supervisor. However, I hope the following general information will be helpful.

An inaugural event generally is not for the purpose of raising campaign funds. Therefore, as a general rule, a payment made to purchase tickets to an inaugural event is not a contribution. An official who receives tickets to an event, other than a campaign fundraiser, may have received a reportable gift within the definition of Gov. Code Section 82028. Gifts of \$50 or more are required to be reported on an official's Statement of Economic Interests.

Shirley Grindle  
September 6, 1985  
Page 2

If any portion of the cost of tickets to an event is used for "political purposes," however, as that term is defined in FPPC regulation 2 Cal. Adm. Code Section 18215 or 18225, the payments for the tickets would meet the definition of a "contribution" and "expenditure," and would be required to be reported on the campaign statement of the candidate or committee on whose behalf the fundraiser is held, and on the campaign statement of the candidate or committee who purchased the tickets. However, an official who receives free tickets to a campaign fundraising event has not received a contribution or a gift.

Thank you for your inquiry. Please call me if you have any questions.

Sincerely,



Jeanne Pritchard  
Chief, Technical Assistance  
and Analysis

JP:kt



TIN CUP  
CAMPAIGN REFORM COMMITTEE

F P P C 1077 West Ball Road  
Anaheim, California 92802  
AUG 12 7 19 AM '85 (714) 772-0144 633-0851

*Time Is Now . . . Clean Up Politics*

August 5, 1985

FPPC  
Legal Division  
P. O. Box 807  
Sacramento, California 95804

Dear Sir:

In my capacity as Chairman of the TIN CUP Campaign Reform Committee, I have monitored campaign contributions to the Orange County Board of Supervisors for the past 10 years. The primary purpose of this close monitoring effort has been to assure that the Political Reform Act of 1974 and our local campaign ordinance are enforced.

In reviewing the Campaign Disclosure Forms filed by certain members of the Orange County Board of Supervisors for the latest reporting period, two areas of concern have arisen.

The purpose of this letter is to request your opinion and/or advice on the following general questions:

1. Is it legal for an elected official to spend campaign contribution funds for such things as a personal hearing aid for himself and travel expenses for said elected official's spouse who accompanied official on county business?
2. Should an expense paid for by a person (who is not a member of the candidate's campaign committee) who is later reimbursed by the campaign committee, be reported as a contribution or a payment by the committee?

EXAMPLE: A prominent developer in Orange County purchased inaugural tickets in the amount of \$625 for one of the County supervisors. At a later date, the campaign committee for that Supervisor reimbursed the developer for these tickets. Should this transaction be reported merely as a "payment" by the campaign committee, or as a contribution by the developer?

It would be greatly appreciated if you could offer some advice on the above issues.

Sincerely,

Shirley L. Grindle  
Chairman, TIN CUP Campaign Reform Committee  
19051 Glen Arran  
Orange, California 92669  
Phone: 714 633-0851