

TO: [] JEANNE [] JAY () DAN
[] LYNN [] BARBARA () JOHN K
[] ROGER [] CARLA () MARY ANN
[] HELEN [] OTHER _____

FROM: Colleen
DATE: 3-25-86

[x] TELEPHONE ADVICE - SEE BELOW
[] CORRESPONDENCE ADVICE - SEE ATTACHED DRAFT
(IF YOU HAVE ANY COMMENTS, NOTIFY ADVISOR WITHIN 1 DAY)

FILE LOCATION: _____
INCLUDE IN ADVICE PACKAGE: YES [] NO []

CALLER Susan Anderson (School Services)
REPRESENTING School Services
PHONE NUMBER: 446-7517

QUESTION: If a lobbyist writes a book and the lobbying firm pays to have the book published and gives free copies to legislators and officials from the Dept. of Education, is the lobbyist or the lobbying firm making a "gift" to those officials? If it is a "gift" who should report the activity the lobbyist or the lobbying firm?

ANSWER: A book is not a "gift" and is not limited to the \$10 gift limiataion, but it is a payment that benefits and the payment should be reported as an activity expense on the lobbying firms statement, since the lobbying firm paid the expenses for having the book published.