



California Fair Political Practices Commission

June 10, 1986

Dale F. Hardeman
7909 Fourth Place
Downey, CA 90241

Re: Your Request for Advice
FPPC No. A-86-174

Dear Mr. Hardeman:

Thank you for your letter of May 13, 1986. The facts as presented in your attached letter regarding our previous conversation are correct.

Government Code Section 82015 defines the term contribution to include "... Notwithstanding the foregoing definition of "contribution," the term does not include volunteer personal services or payments made by any individual for his or her own travel expenses if such payments are made voluntarily without any understanding or agreement that they shall be, directly or indirectly, repaid to him or her."

Please do not hesitate to contact me if you need additional assistance.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ann Kvasager".

Mary Ann Kvasager
Political Reform Consultant

MAK:kt
Attachment

F P F C

MAY 19 11 40 AM '86

DALE F. HARDEMAN
7909 4th Place
Downey, CA 90241

May 13, 1986

10:20 AM

Fair Political Practices Commission
Ms Mary Ann Kvasager
P.O. Box 807
Sacramento, CA 95804

RE: Request for opinion regarding reportable non-monetary contributions to "Friends of Roy Paul Committee", City of Downey Council, District 2 election.

Dear Ms Kvasager,

Thank you for the opportunity to speak with you regarding the above captioned matter.

In our conversation, I indicated to you that up until April 30, 1986, I was a legislative aid to Assemblyman Wayne Grisham and that I resigned to take a partnership interest in Target Data Services, a firm which sells mailing lists and labels, conducts public opinion surveys, and performs data processing tasks for political candidates and corporate marketing programs.

I also indicated to you that Target Data Services has contracted with Downey City Council candidate Roy Paul for the sale of above services and that Target Data provides these services at fair market value.

It was also indicated that aside from my firm's services, I volunteer my personal time to occasionally meet with Mr. Paul's campaign manager and volunteers and to walk precincts when possible.

You indicated to me that, in your opinion, if I was not going to be compensated for my individual services, aside from that of the Target Data Services, it was not necessary for Mr. Paul to report my volunteer services as non-monetary contributions to his campaign and that, based on the information provided, you could not discern any violation of Fair Political Practices reporting laws.

FPPC, Mary Ann Kvasager, Page 2.

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I would appreciate your providing a signature of confirmation as to the above conversation and opinion.

Thank you for your time and attention.

Sincerely,

A handwritten signature in cursive script that reads "Dale F. Hardeeman". The signature is written in dark ink and is positioned above the printed name.

DALE F. HARDEMAN

CC: Roy Paul
File



California Fair Political Practices Commission

May 23, 1986

Dale F. Hardeman
7909 - 4th Place
Downey, Ca 90241

Re: 86-174

Dear Mr. Hardeman:

Your letter requesting advice under the Political Reform Act has been received on May 19, 1986 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact the Technical Assistance and Analysis Division at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or unless more information is needed to answer your request, you should expect a response within 21 working days.

Very truly yours,

A handwritten signature in cursive script that reads "Jeanne Pritchard".

Jeanne Pritchard
Chief

Technical Assistance and Analysis
Division

Handwritten initials in cursive script, possibly "JP".

JP:plh

TO: () JOHN L. () BOB L. () AL () JEANNE
() JOHN K. () KATHY () MARY ANN
() LYNN () JOHN M. () CARLA
() JAY () ROGER () HELEN

FROM: KVASAGER

DATE: 6/10/86

() OTHER: _____

[] TELEPHONE ADVICE - SEE BELOW

[] CORRESPONDENCE ADVICE - SEE ATTACHED DRAFT

(IF YOU HAVE ANY COMMENTS, NOTIFY ADVISOR WITHIN 1 DAY)

FILE LOCATION: A-86-174

INCLUDE IN ADVICE PACKAGE: YES [] NO []

CALLER DALE F HARDEMAN

REPRESENTING _____

PHONE NUMBER: _____

QUESTION: IS PERSONAL TIME VOLUNTEERED
TO A CANDIDATE'S CAMPAIGN
CONSIDERED A CONTRIBUTION

ANSWER: VOLUNTEER PERSONAL TIME, SERVICES,
OR PAYMENTS ARE NOT CONTRIBUTIONS
IF SUCH PAYMENTS ARE MADE VOLUNTARILY
WITHOUT ANY UNDERSTANDING OR AGREEMENT
THAT THE PERSON WILL BE DIRECTLY
OR INDIRECTLY REPAYED