



# California Fair Political Practices Commission

October 6, 1986

Honorable Marian Bergeson  
Senator, Thirty-Seventh District  
140 Newport Center Drive, Suite 120  
Newport Beach, CA 92660

Re: Your Request for Advice  
Our Advice No. A-86-273

Dear Senator Bergeson:

Thank you for your recent letter requesting advice concerning your reporting duties under the Political Reform Act.<sup>1/</sup> In that letter, you requested clarification of a legislators' reporting duties concerning fundraising events.

As you know, you are required to report gifts you receive which are valued at \$50 or more. Government Code Section 87207. However, tickets to political fundraisers are not reportable as gifts or other income. See Cory Opinion, 1 FPPC Opinions 137 (No. 75-094-C, October 1, 1975) (copy enclosed). The Commission has taken the position that these tickets have no value. Therefore, they are not reportable.

Tickets to charitable fundraising events which are provided to an official by the sponsor of the event are also not reportable gifts. However, tickets to fundraisers purchased by someone other than the sponsor and then given to the official may be reportable as gifts. The reportable value of such tickets is the value of the event itself, i.e., the meal, entertainment, etc. The portion of the ticket price that represents a charitable contribution is not included in calculating the value of the gift. Thus, if the actual value of the event is \$50 or more, the ticket to the official should be reported. See Advice Letter to Mary Erbez (No. I-86-133; April 29, 1986); Advice Letter to Charles Ruben (No. A-84-015; Feb. 14, 1984) (copies enclosed).

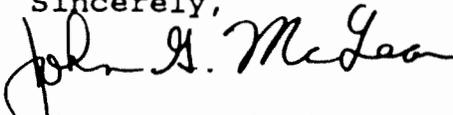
In September of 1985, the Commission did notice a proposed regulation which would have modified the reporting requirements for political and charitable fundraisers. No action was taken to finalize that proposed amendment, so it will not take

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effect. However, the Commission does receive periodic requests for modification of the rules outlined above. For that reason, you would be well advised to contact us periodically to verify that the advice given here remains current.

I hope this answers your questions. If I can be of further assistance, please feel free to call me at (916) 322-5901.

Sincerely,

  
for  Diane M. Griffiths  
General Counsel

DMG:km  
Enclosures



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September 3, 1986

John H. Larson, Chairman  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, California 95814

Re: Advice requested; conflict of interest reports

Dear Mr. Larson:

I would appreciate clarification of the law with regard to the reporting of gifts on legislators' conflict of interest statements.

Specifically, when a legislator is hosted at a fundraising event (the fundraiser being either for a colleague, for a charity, or for an organization such as an art museum), must the legislator report as the value of the gift: a) the ticket price; b) the actual cost (such as the cost of his attendance, since part of the ticket price is a donation); or c) the pro-rated cost of the ticket if the host paid an amount different than an individual ticket cost (such as if the host purchased a table, or made a donation at a cost unrelated to the actual ticket cost of the event in exchange for places at the event).

I would also like clarification as to whether it is required to report a "comp" ticket to the fundraiser of another legislator.

Thank you for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Marian Bergeson".

MARIAN BERGESON  
Senator, 37th District

MB/lrf