

# Memorandum

To : Chairman Larson

Date : March 16, 1987

File No. M-87-089

From : FAIR POLITICAL PRACTICES COMMISSION

Bob Leidigh *RL*

Subject : Reporting of Country Club Golfing Passes Under New Gift Regulations

You have inquired regarding the correct method for valuing and reporting gift passes received from private country clubs for golfing privileges. As I understand the facts, the country club issues an annual pass to the public official. The official may then utilize the pass for golfing at no charge. The country club keeps a record of the usage and reports the value of the actual usage to the public official at the end of the year.

Under newly adopted Regulation 18726.3, the value is the actual use made of the pass by the official any any guests he brings in under the pass, plus any possible use by anyone to whom he transfers (loans) the pass.

As I understand it, here there was no transfer. Hence, the value reported by the country club should accurately reflect the value of the gift received. If that value is \$50 or more, it must be reported on the official's annual statement of economic interests. If the value was less than \$50, no reporting is required.

BL:plh