



# California Fair Political Practices Commission

November 8, 1988

Roland Bowns, Chief Counsel  
Legal Office  
California State Lottery  
600 North 10th Street  
Sacramento, CA 95814

Re: 88-427

Dear Mr. Bowns:

Your letter requesting advice under the Political Reform Act was received on November 4, 1988 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jeanne Pritchard", is written over the typed name.

Jeanne Pritchard  
Chief  
Technical Assistance and Analysis  
Division

JP:plh

**CALIFORNIA STATE LOTTERY**

600 North 10th Street  
Sacramento, CA 95814

FPPC  
Nov 4 2 51 PM '88

88-467

November 1, 1988

Diane Griffiths  
Chief Counsel  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, CA 95814

Dear Ms. Griffiths:

The California State Lottery has received an invitation from KFOY Radio Station to send two Lottery representatives to a KFOY-sponsored event. This offer includes air transportation provided by KFOY and an opportunity to meet other KFOY clients at this event.

Regarding the reporting requirements for designated employees who may be subject to disclosure, and after reviewing the 1987/88 Manual for Statements of Economic Interests for Designated Employees Form 730, we are of the determination that if the California State Lottery accepts the invitation to attend the event, and KFOY provides air transportation, the designated employees would not be required to report these as gifts or income

It is also our understanding that the employees chosen to represent the Lottery at this event should not claim per diem for meals provided at no cost to the employee.

Before accepting this invitation, we would appreciate your legal opinion regarding the disclosure requirements as outlined above.

Sincerely,

  
Roland Bowns  
Chief Counsel  
Legal Office

RKB:peg