



California Fair Political Practices Commission

December 26, 1989

Teresa Craigie
Pillsbury, Madison & Sutro
Post Office Box 7880
San Francisco, CA 94120

Re: Your Request for Informal Assistance
Our File No. I-89-674

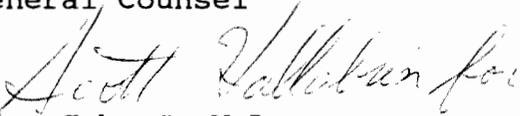
Dear Ms. Craigie:

We have received your letter of November 20, 1989 (copy attached) seeking written confirmation of the advice I provided in our recent telephone conversation. This is to confirm that your letter accurately reflects that advice.

If you have any further questions, please contact me at (916) 322-5901.

Sincerely,

Kathryn E. Donovan
General Counsel


By: John G. McLean
Counsel, Legal Division

KED/JGM/aa

Attachment

LAW OFFICES OF

PILLSBURY, MADISON & SUTRO

OTHER OFFICES

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WRITER'S OFFICE AND
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235 Montgomery Street
(415) 983-1968

November 20, 1989

VIA FEDERAL EXPRESS

Mr. John McLean
Legal Division
Fair Political Practices
Commission
428 J Street, Suite 800
Sacramento, CA 95814

Dear John:

The purpose of this letter is to confirm your informal oral advice.

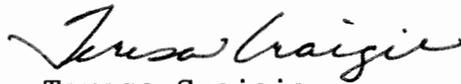
I explained that, from time to time, our clients may provide services or advice to a local governmental agency which could be characterized as a "gift" to one or more of the members of the local governmental agency. For example, in one instance, a corporation was going to pay for the services of an advisor who would prepare a report for a local governmental agency on governmental administration and would provide some preliminary guidance on administrative issues.

It was your opinion that, in this situation, the corporate payment would probably not be a "gift" to any public official under Section 82028 of the Government Code. You explained that, although the governmental agency would benefit from the advisor's services, no agency member would receive any personal benefit therefrom. However, you said that, without obtaining formal written advice from the Commission to that effect, it would be prudent to comply

Mr. John McLean
November 20, 1989
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with the provisions of the Stone Opinion (3 FPPC Opinions
52).

Very truly yours,


Teresa Craigie

I agree with the foregoing.

John McLean
Legal Division
Fair Political Practices Commission



California Fair Political Practices Commission

November 29, 1989

Teresa Craigie
Pillsbury, Madison & Sutro
P.O. Box 7880
San Francisco, CA 94120

Re: Letter No. 89-674

Dear Ms. Craigie:

We received your letter requesting confirmation of advice under the Political Reform Act on November 27, 1989. Your letter has been assigned to John McLean, an attorney in the Legal Division, for response. If you have any questions, you may contact him directly at (916) 322-5901.

If the letter is appropriate for confirmation without further analysis, we will attempt to expedite our response. A confirming response will be released after it has gone through our approval process. If the letter is not appropriate for this treatment, the staff person assigned to prepare the response will contact you shortly to advise you. In such cases, the normal analysis, review and approval process will be followed.

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

Sincerely,

A handwritten signature in cursive script that reads "Kathryn E. Donovan".

Kathryn E. Donovan
General Counsel

KED:plh:confadv1