



California Fair Political Practices Commission

December 26, 1989

Lori Crawford
Accounting Assistant
California Cable Television Association
4341 Piedmont Avenue
Oakland, CA 94611

Re: Your Request for Advice
Our File No. A-89-679

Dear Ms. Crawford:

You have requested confirmation of telephone advice provided to you concerning the campaign provisions of the Political Reform Act. (Government Code Sections 81000-91015.)

Your letter, dated November 22, 1989, correctly summarizes my advice. Your payment of \$500 to Gwen Moore for presenting an award at a Cable Television Association function would not be considered a campaign contribution. You have indicated to me that this was not arranged by the Association's lobbyist, so the payment would not be subject to the gift restrictions on lobbyists. In addition, since this is not a payment for a speech on the governmental process, it is not subject to the \$1,000 limitation on gifts and honoraria.

A copy of your letter is enclosed for your convenience.

Please contact me at (916) 322-5662 if you have any additional questions.

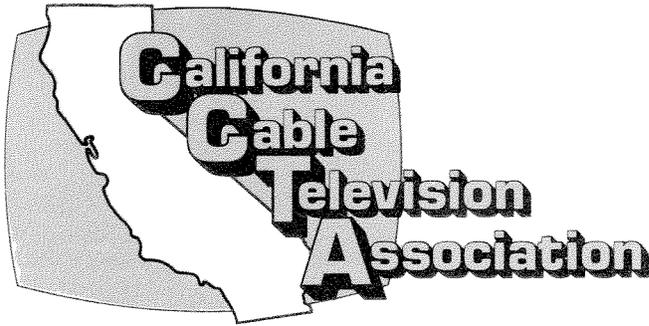
Sincerely,

Kathryn E. Donovan
General Counsel

A handwritten signature in cursive script that reads "Wayne P. Imberi".

By: Wayne P. Imberi
Political Reform Consultant

Enclosure



Nov 21 9 11 AM '89

4341 PIEDMONT AVENUE
P.O. BOX 11080
OAKLAND, CALIFORNIA 94611
(415) 428-2225

President
SPENCER R. KAITZ

November 22, 1989

Mr. Wayne Imberi
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, CA 95804

Dear Mr. Imberi:

Last month we talked about a contribution that was given to Gwen Moore of \$500 for presenting an award at a cable function. It was discussed whether this should be a political contribution, as she would simply be presenting this award and would not be discussing the legislative process in any way.

After you reviewed the rules and consulted with a lawyer, it was determined that this would not be a political contribution and would not be in the \$2500 legislative limits.

Would you please verify this send and send back an endorsement stating that this would not be considered a political contribution.

As we are audited on a yearly basis, this information would be added to campaign information files for any future campaign audits.

Thank you for your help in this matter. Please give me a call if you should have any further questions.

I have enclosed a return envelope with postage for your convenience.

Sincerely,

Lori Crawford
Accounting Assistant

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Enclosure



California Fair Political Practices Commission

November 30, 1989

Lori Crawford
Accounting Assistant
California Cable Television
Association
P.O. Box 11080
Oakland, CA 94611

Re: Letter No. 89-679

Dear Ms. Crawford:

We received your letter requesting confirmation of advice under the Political Reform Act on November 27, 1989. Your letter has been assigned to our Technical Assistance and Analysis Division for response. If you have any questions, you may contact that division directly at (916) 322-5662.

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,

Kathryn E. Donovan
General Counsel

KED:plh:confadv1