

In kind contributions in
Post election statements/cumulation
82015

March 3, 1976

A-76-573

Floyd S. Mori
Capitol Mall
Sacramento CA 95814

Dear Assemblyman Mori:

Enclosed please find a copy of the staff's most recent legislative package. As I indicated to you last wednesday, the Commission, in its meeting of March 2 - 4, will be considering which of these staff proposals it wishes the Legislature to enact. If you have any comments or suggestions, please feel free to contact me.

With respect to the reporting of private airplane flights, the staff concluded that such services may be reported as in-kind contributions to you or your committee. These flights need not be reported on your statement of economic interests so long as they were connected with your role as a legislator or politician. For a more thorough discussion of the reporting requirements, I am enclosing a copy of the opinion requested by Assemblyman Willie Brown (75-055). As to the value of such flights, you should make a good faith estimate based on any information provided by the donor. The staff thought that the price of a commercial airline ticket would not be an appropriate measure of value in most instances.

Staff also concluded that your interpretation of the cumulation provisions of Chapter 4 was correct, i.e., that cumulation must occur from one post-election statement to the next without respect to whether the elections are state or local.

I enjoyed meeting with you last week and appreciate your offer to help pass amendments to the Act which further its purposes. If you have any further comments or questions, please give me a call.

Sincerely,

Ted Fria
Staff Counsel
Legal Division

TP:pvp