

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • 1100 K STREET BUILDING, SACRAMENTO, 95814  
107 SOUTH BROADWAY • • • SUITE 7007 • • • LOS ANGELES, 90012

October 3, 1980

Mrs. Helen Kawagoe, City Clerk  
City of Carson  
701 East Carson  
Carson, California 90749

A-80-10-051

Dear Mrs. Kawagoe:

In response to your request of September 30, 1980, this letter is to confirm my advice to you concerning the filing obligations of Mr. Walter Egan's committee.

The facts you presented are as follows:

1. The "Friends of Walter J. "Jake" Egan" committee (Committee "A") reported payments of \$950.00 and \$800.00, a total of \$1,750 to the "Carson News Progress" committee (Committee "C") on Schedule E, Payments and expenditures for printing of brochures.
2. The "Committee to Elect Kay Calas" (Committee "B") reported a payment of \$1,750 to the "Carson News Progress" committee (Committee "C") on Schedule E, Payments and expenditures for printing of brochures.
3. Both Committee "A" and Committee "B" filed "Late Contribution" reports showing the expenditures to Committee "C" since the expenditures to Committee "C" were made after the closing date of the second pre-election statement and before the election date pursuant to Government Code Section 84214.
4. Committee "C" filed a "Late Contribution report showing receipt of the \$1,750 from Committee "A" from Committee "B" for a total of \$3,500, pursuant to Government Code Section 84214.
5. Committee "C" reported receipt of \$1,750 from each Committee "A" and Committee "B" as well as payments to printers for the printing of brochures in the amount of \$3,500 on their post-election campaign statement.

Mrs. Helen Kawagoe  
Page 2  
October 3, 1980

The question you asked was whether or not Committee "A" and "B" would be required to report on a "Late Contribution" report the receipt of an in-kind contribution for the brochures printed, for which they had already reported making the payments for?

I advised that the term "contribution" is defined by adopted regulation by the Fair Political Practices Commission as follows: ..."'Contribution' includes any monetary or non-monetary payment for which full and adequate consideration is not made to the donor that is received by or made at the behest of:..." (2 Cal. Adm. Code Section 18215).

Therefore, since Committee "A" and Committee "B" fully paid Committee "C" for the printing of their brochures, they did give Committee "C" "full and adequate consideration" for printing the brochures and did not receive an in-kind contribution from Committee "C" which was paid for goods and services delivered to Committees "A" and "B."

I hope that this information has been helpful, please feel free to contact my office for any further assistance.

Sincerely,



Helen P. Arriola  
Political Reform  
Consultant

HPA:jg