

# State of California

A-81-192



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance • • Administration • • Executive/Legal • • Enforcement • • Statements of Economic Interest  
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September 11, 1981

Martha D. Kramer  
General Telephone Company of California  
P.O. Box 889  
Santa Monica, CA 90406

Dear Ms. Kramer:

Thank you for your letter of August 13, 1981, in which you indicated that General Telephone Company of California (GTE) will hold a luncheon on company facilities so that employees may "get acquainted" with legislators. You asked about the reporting requirements of GTE as a lobbyist employer for this event.

2 California Administrative Code Section 18623(a) states:

"As used in this section, "honorarium" means a payment for speaking at any event, participating in a panel or seminar or engaging in any similar activity. For purposes of this section, free admission, food beverages and similar nominal benefits provided to a filer at an event at which he or she speaks, participates in a panel or seminar or performs a similar service, and a reimbursement or advance for actual intrastate travel and for necessary accommodations provided directly in connection with the event are neither payments nor exchanges."

Unless the legislators are functioning at the luncheon as described above, all payments by GTE in connection with the luncheon are payments for or in connection with direct communication with legislative officials within the meaning of Government Code Section 82045(c) and must be reported as payments to influence legislative or administrative action.

If I can be of any further assistance, please feel free to contact me.

Yours Very Truly,

Lynn Montgomery  
Political Reform Consultant

8/19/81



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EXECUTIVE OFFICES

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IN REPLY REFER TO  
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August 13, 1981

Ms. Lynn Montgomery  
Political Reform Consultant  
Fair Political Practices Commission  
1100 K Street  
Sacramento, CA 95814

Dear Ms. Montgomery

As you suggested in our conversation yesterday, I am submitting the question on reporting we discussed to you for a written reply.

General Telephone Company of California regularly invites local legislators (during non-election years) to company facilities to have lunch and speak with 40 to 50 employees. These luncheons are simply to allow the legislator and constituents to "get acquainted" and do not focus on specific bill(s). None of the attendees are registered lobbyists. Our question is: Are we required to report the cost of these luncheons as a lobbying expense? If so, must we report the cost of the entire luncheon or just report costs allocable to the legislator and his or her staff?

We would appreciate your response as soon as possible because some of these luncheons have already been held, and we do not want to be delinquent in our reports. Thank you for your help.

Sincerely

*Martha D. Kramer*

MARTHA D. KRAMER  
Governmental Affairs Analyst