



# California Fair Political Practices Commission

April 2, 1986

Howard Jarvis  
6363 Wilshire Blvd.  
Los Angeles, CA 90048

Re: FPPC No. A-86-095

Dear Mr. Jarvis:

FPPC Chairman John Larson has asked me to answer your letter dated March 11, 1986, in which you asked for a definition of the phrase, "Aid in Kind."

The phrase "Aid in Kind" is not, to my knowledge, used in the Political Reform Act. However, the term, "non-monetary contribution" is used in connection with contributions which must be disclosed by candidates and committees subject to the Act's campaign disclosure provisions.

The Act provides that the term "contribution" includes:

...the distribution, transfer, loan, advance, deposit, gift or other rendering of money, property, services or anything else of value, whether tangible or intangible, for which full and adequate consideration is not made.

When a committee receives property, services or anything else of value (other than a monetary payment) for which the committee has not provided full and adequate consideration, the committee has received a "non-monetary contribution." Committees must report (in addition to monetary contributions received) all non-monetary contributions. For each non-monetary contribution of \$100 or more from a single source, the committee must report the name, address, occupation and employer of the contributor, a description of the goods or services provided, the date the goods or services were provided, the fair market value of the goods or services, and cumulative amount of all contributions received from the source.

Generally, the fair market value of goods or services which are non-monetary contributions is whatever it would cost the committee receiving the goods or services to purchase them on the open market.

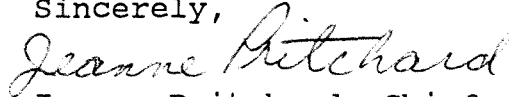
Howard Jarvis  
April 2, 1986  
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Gov. Code Section 82015 provides certain exceptions to the definition of "contribution." These exceptions are also set out in subdivision (d) of FPPC regulation 2 Cal. Adm. Code Section 18215.

Enclosed for your information is a copy of the "Political Reform Act of 1974 as amended to January 1, 1986," and a copy of FPPC regulation 2 Cal. Adm. Code Section 18215.

If you have any questions about whether specific goods or services received by a committee are "non-monetary contributions," or about how to value or report non-monetary contributions, please call me at (916) 322-5662.

Sincerely,



Jeanne Pritchard, Chief  
Technical Assistance  
& Analysis Division

JP:kt

Enclosures: Act  
Section 18215

HOWARD JARVIS

March 11, 1986

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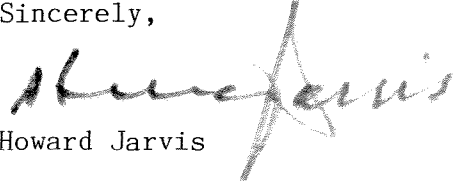
Mr. John Larson, Chairman  
Fair Political Practices Commission  
107 South Broadway, Room 7007  
Los Angeles, California 90012

Dear Sir:

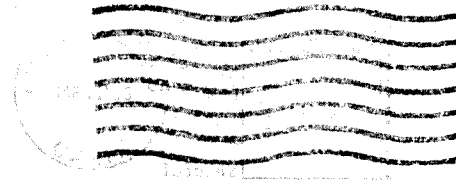
I would like to know what the phrase in the law "Aid in Kind" means and does it require all contributors to political campaigns of "Aid in Kind, with no exceptions, to report the actual cost of aid in kind to your commission.

We are about to commence a campaign for a state initiative and I would be most grateful for this information as soon as possible.

Sincerely,

  
Howard Jarvis

HOWARD JARVIS  
6363 Wilshire Boulevard  
Los Angeles, California 90048



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Mr. John Larson, Chairman  
FAIR POLITICAL PRACTICES COMMISSION  
107 South Broadway, Room 7007  
Los Angeles, California 90012

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