



California
Fair Political
Practices Commission

SUPERSEDED

By: 89513

March 14, 1991

Robert E. Leidigh
Olson, Connelly, Hagel, Fong & Leidigh
300 Capitol Mall, Suite 350
Sacramento, CA 95814

Re: Your Request for Informal Assistance
Our File No. I-90-435

Dear Mr. Leidigh:

You have requested informal assistance¹ regarding interpretation of Regulation 18526.1 promulgated to clarify provisions of the Political Reform Act (the "Act").² Your question involves when an expenditure will be considered to have been "paid" for purposes of calculating the period during which the expenditure can be reimbursed, if the expenditure is by credit card. As we discussed, Regulation 18526.1 has effectively been superseded by enactment of Section 89513 which sets forth the criteria for reimbursement of expenditures made by an incumbent elected officer. That section provides that the time for reimbursement in the case of an expenditure charged to a credit card or charge account is within 90 days of the end of the billing period in which the expenditure was included. (Section 89513(b)(3).)

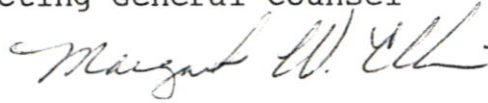
¹ Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

² Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

If view of the statutory clarification of your question, we have agreed that no further response to your advice request is necessary.

Sincerely,

Scott Hallabrin
Acting General Counsel

A handwritten signature in cursive script, appearing to read "Margaret W. Ellison".

By: Margaret Ellison
Counsel, Legal Division

SH:ME:dg