



California Fair Political Practices Commission

September 4, 1990

Jerry Simmons
Simmons & McAndrews
1441 Fourth Street
Santa Monica, CA 90401

Re: Your Request for Informal Assistance
Our File No. I-90-508

Dear Ms. Simmons:

You have requested written confirmation of informal assistance provided to you concerning the campaign provisions of the Political Reform Act. (Government Code Sections 81000-91015.) Because you have not identified the person on whose behalf you are seeking assistance, we treat your letter as a request for informal assistance, rather than formal advice.^{1/}

Your letter, dated August 3, 1990, correctly states my advice that a candidate controlled committee may sell a block of tickets to an entertainment event to another candidate controlled committee as long as the fair market value of the tickets is paid. The "fair market value" is whatever it would cost the committee to purchase the same tickets on the open market.

Please do not hesitate to contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Scott Hallabrin
Acting General Counsel

By: Lynda Cassady
Political Reform Consultant

^{1/} Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Government Code Section 83114; 2 Cal. Code of Regs. Section 18329(c)(3).)