



California  
Fair Political  
Practices Commission

**SUPERSEDED**  
by A-93-156 (Foster)

October 31, 1991

Dan C. Dunmoyer  
Vice President of Legislative Policy  
Personal Insurance Federation of California  
801 K Street, Suite 1936  
Sacramento, CA 95814

Re: Your Request For Advice  
Our File No. A-91-459

Dear Mr. Dunmoyer:

You have requested advice on the lobbying disclosure provisions of the Political Reform Act (the "Act").<sup>1/</sup>

QUESTION

As a registered lobbyist, are you required to report on your quarterly lobbying disclosure report legislative officials who attended your wedding and reception? If you are required to report this activity, how do you determine the actual reportable costs of the event?

CONCLUSION

Reportable officials who attended your wedding reception have received gifts and are, therefore, required to be disclosed on your lobbying disclosure report. To determine the amount of the gift received by each official, divide the total cost of the reception by the total number of persons attending. The total cost of the reception includes payments for food and beverages, decorations, entertainment, caterers, and similar expenses.

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<sup>1/</sup> 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.

ANALYSIS

Lobbyists are required to report as activity expenses on their quarterly lobbying reports gifts and other payments which benefit reportable officials. Reportable officials include a state candidate, elected state officer, or legislative official, an agency official of a state agency when the official is required to be listed on the registration statement of the lobbying firm or the lobbyist employer of the lobbyist. (Section 86201.) An activity expense is any payment which benefits in whole or in part an elective state official, a legislative official, an agency official, a state candidate, or a member of the immediate family of such an official or candidate. Activity expenses include gifts, honoraria, consulting fees, salaries, and any other form of compensation but do not include campaign contributions. (Section 86111.)

Section 82028 defines "gift" as:

Any payment to the extent that consideration of equal or greater value is not received and includes a rebate or discount in the price of anything of value unless the rebate or discount is made in the regular course of business to members of the public without regard to official status....

Section 86203 provides that it is unlawful for a lobbyist, or lobbying firm, to make gifts to one person aggregating more than ten dollars in a calendar month, or to act as an agent or intermediary in the making of any gift, or to arrange for the making of any gift by any other person.

If you have any further questions regarding this matter, please feel free to contact me at 916/322-5662.

Sincerely,

Scott Hallabrin  
Acting General Counsel

By: Mary Ann Kvasager  
Political Reform Consultant