



California Fair Political Practices Commission

February 19, 1992

Diane M. Fishburn
Olson, Connelly, Hagel,
Fong & Leidigh
300 Capitol Mall, Ste. 350
Sacramento, CA 95814

Re: Your Request for Confirmation
of Telephone Advice
Our File No. I-92-61

Dear Ms. Fishburn:

You have requested confirmation of telephone advice provided to you concerning the lobbying disclosure provisions of the Political Reform Act.^{1/} Because you have not indicated that you are requesting this advice on behalf of a person with duties under the Act, we treat your request as one for informal assistance pursuant to Regulation 18329(c)(3).^{2/}

Your letter accurately summarizes my advice that Section 86112.5, which went into effect on January 1, 1992, and requires lobbyists, lobbying firms, and lobbyist employers to notify officials to whom they have made gifts of the date, amount, and nature of those gifts, does not apply to gifts made in 1991 or earlier. Section 86112.5 will apply to gifts made during 1992 and later.

^{1/} 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.

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

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

Sincerely,

Scott Hallabrin
Acting General Counsel

Carla Wardlow

By: Carla Wardlow
Assistant Division Chief
Technical Assistance and
Analysis Division