



California Fair Political Practices Commission

July 16, 1992

Greg Haskin
Republican Party of Orange County
245 Fischer
No. C-2
Costa Mesa, CA 92626

Re: Your Request for Advice
Our File No. A-92-367

Dear Mr. Haskin:

This is in response to your letter regarding the campaign disclosure provisions of the Political Reform Act (the "Act").¹

QUESTION

The Republican Party of Orange County has agreed to lend the use of their committee name for the Asian American Festival, an event held by an organization known as the Asian Republicans. The event is designed to highlight Republican candidates and to encourage Asians to register as Republicans. The Republican Party of Orange County has no control over the event and will receive no direct financial benefit. Is the Republican Party of Orange County required to disclose financial activity resulting from the event held by the Asian Republicans?

CONCLUSION

The Republican Party of Orange County is not required to disclose financial activity resulting from an event held by the Asian Republicans.

ANALYSIS

Section 82025 defines "expenditure" as a payment, a forgiveness of a loan, a payment of a loan by a third party, or an enforceable promise to make a payment, unless it is clear from the

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.

surrounding circumstances that it is not made for political purposes. Regulation 18225(a)(1) states that a payment is "made for a political purpose" if it is for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate or candidates, or the qualification or passage of any measure.

Section 82044 states that a "payment" means a payment, distribution, transfer, loan, advance, deposit, gift or other rendering of money, property, services or anything else of value, whether tangible or intangible. The fact that the Republican Party of Orange County allows the use of it's committee name for the event does not require the committee to disclose on its campaign disclosure statement the financial activity that occurs as a result of the Asian American Festival.

Please contact me at (916) 322-5662 if you have additional questions regarding this matter.

Sincerely,

Scott Hallabrin
Assistant General Counsel



By: Sandra L. Taylor
Political Reform Consultant