



California Fair Political Practices Commission

October 25, 1994

James L. Hagar, Esq.
Hagar & Cotten
680 Alta Vista Drive, Suite 102
Vista, California 92084

Re: Your Request For Advice
Our File No. A-94-334

Dear Mr. Hagar:

We confirm the advice given to you by telephone on October 13, 1994.

Generally, a discount in newspaper advertising services offered to a candidate for elective office in California that is not generally available to all other candidates on an equal basis, would be considered a contribution to that candidate in the amount of the discount. (See Cal. Gov. Code §82015.) However, the surrounding circumstances of the discount your client's newspaper extended, make it clear that the discount was not offered for political purposes. Accordingly, there is no reportable contribution from the newspaper to the candidate in the facts you have described. A contribution has been made by the purchaser of advertising space to the candidate; however, any reporting obligations are those of the candidate and contributor, depending on the amount contributed, and your client has no obligation in this regard.

If you have any further questions in this matter, this office remains available to assist you.

Sincerely,

Steven G. Churchwell
General Counsel

A handwritten signature in cursive script that reads "Daniel E. Muallem".

By: Daniel E. Muallem
Counsel, Legal Division