



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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Fourth Quarter Update

Ethics – Gifts, Honorarium, Travel and Use of Campaign Funds

Regulations adopted by the Commission

The following are regulatory changes approved by the Commission during the past quarter concerning gifts, honorarium, travel, and use of campaign funds. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

Amend

[Regulation 18545](#) – Contribution Limit and Voluntary Expenditure Ceiling Amounts

[Regulation 18700](#) – Basic Rule and Guide to Conflict of Interest Regulations

[Regulation 18730](#) – Provisions of Conflict of Interest Codes

[Regulation 18940.2](#) – Gift Limit Amount

Advice Letters

The following are advice letters issued by the Commission’s Legal Division during the past quarter concerning questions about gifts, honorarium, travel, and use of campaign funds. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Gifts

Victoria Hester

[A-22-102](#)

A mayor will have a reportable gift for an invitation-only event attended by the mayor and a guest. The value of the gift is the official and the guest’s pro-rata share of the costs of the event attributable to the two government entity hosts for the event. Any additional specific benefits provided, with the exception of items that meet the definition of “informational material,” will be reportable at the item’s fair market value.

Sarah Lange

[I-22-110](#)

A non-profit’s plan to raise funds for its fellows program would not result in classification of donors as sources of gifts to public officials. Rather, the source of any gifts would be the bona fide 501(c)(3) nonprofit corporation. However, the value of the program itself and the course materials provided in connection with the educational program are educational materials and would not be regarded as “gifts” to the participants. Moreover, payments for travel would qualify Advice Letter Report Page 2 for the exemption for gifts of travel from a 501(c)(3) corporation. Under this exception, payments for the travel are reportable gifts but not subject to the Act’s gift limit.

Rachel Van Mullem

I-22-108

Reimbursements for travel and per diem costs associated with Official's duties as a board member of a nonprofit 501(c)(3) organization are generally not considered reportable income or gifts under Act.

Commission Opinions

None

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter concerning gifts, honorarium, travel, and use of campaign funds. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

None.

Legislation

None.