

one or more public officials, immediate family or staff, which occasion costs a registrant \$25 or more. The legislative history fails to make clear whether the General Assembly intended that the expenditure or the occasion be for the benefit of a public official, etc. However, some insight may be gained from the fact that the reason the section was amended so frequently prior to its passage was the concern among legislators that when lobbyists benefited public officials, that fact should be disclosed. At one time a report was required only when the expenditure was \$25 per person per occasion. Legislators kept attempting to close this "gigantic loophole", citing the example that it would allow a lobbyist to entertain a legislator at a \$24.99 dinner every night of the legislative session without the public being made aware of it. The present language was drafted for the purpose of maximum disclosure to the public, informing it of every occasion of any economic significance at which one or more public officials is benefited.

This purpose is served by requiring a report, giving some detail, whenever a public official, a member of his immediate family, or staff is benefited at an occasion costing \$25 or more, regardless of how much he is benefited, or all the public officials, their immediate family and staff, present as guests, are benefited.

This not only appears to have been the intent of the General Assembly but it avoids the problem of allocating benefit among guests. With regard to the reception under consideration, it is not necessary for the registrar to monitor whether the public officials consumed more than their share of food and drink, so that the 12 legislators in fact enjoyed cocktails and canapes worth \$25 or more.

In summary, a registrant must include in his financial report a verified statement, itemizing the information required by the last sentence of section 7, Public Act Number 77-605, whenever the registrant benefits one or more public officials, their immediate family or staff, at an occasion which costs at least \$25.

By order of the Commission,



Rev. Thomas J. Lynch
Chairman

Dated August 4, 1978