

**Ariel Koerner**

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**From:** ethics  
**Sent:** Tuesday, October 1, 2019 1:01 PM  
**To:** Ashley Kemp  
**Cc:** Stephanie Black  
**Subject:** FW: Advisory Opinion Request

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**OKLAHOMA ETHICS  
 COMMISSION**

**From:** Mary Ann Nelson-Sutterfield <MaryAnn.Nelson@stewart.com>  
**Sent:** Tuesday, October 1, 2019 12:59 PM  
**To:** ethics <ethics@ethics.ok.gov>  
**Cc:** Mary Ann Nelson-Sutterfield <MaryAnn.Nelson@stewart.com>  
**Subject:** Advisory Opinion Request

I would like to request an Advisory Opinion Request to rule on whether the "solicitation" definition includes items purchased for a raffle by an Affiliated Association for benefit of the Political Action Committee. Below is Rule 2.86 and 2.63 which we referred to when trying to determine if this is allowed per Ethics Commission rules.

**Rule 2.86. Political Action Committee Statement of Organization Additional Requirements for Affiliated Entities.**

In addition to other information required on the Statement of Organization, a Statement of Organization for a limited committee that is affiliated with a corporation or labor union shall include, but not be limited to, the name, mailing address, street address, electronic mailing address, main telephone number and Internet website, if applicable, of the corporation or labor union with which the limited committee is affiliated. "Affiliated", as used in this section, means a corporation or labor union that may lawfully use its funds to pay for the establishment of, administration of and solicitation of contributions to the limited

**Rule 2.63. Fund-Raising Auctions or Sales Events.**

Any goods or services donated to an auction or other sales event held by a political party committee, political action committee or candidate committee shall be considered as contributions based on the fair market value of the goods or services. Any money paid for goods or services at such an event shall be considered as contributions. No goods or services may be donated or purchased for such an event by a corporation.

Thank you in advance for your guidance.

Mary Ann Nelson-Sutterfield  
 OKIE TIPAC Director

Mary Ann Nelson-Sutterfield  
 President

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