

## Cincinnati Elections Commission

Jill P. Meyer, Chair  
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May 24, 2007

### Advisory Opinion

**TO:** Keith Davis

**FROM:** Jill P. Meyer, Chair, Cincinnati Elections Commission

**Copies to:** Members, Cincinnati Elections Commission

**SUBJECT:** **Campaign Contributions by Related Federal PAC and Federal Campaign Committee**

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This advisory opinion is in response to your March 23, 2007 e-mail requesting a ruling on whether an individual who chaired a federal candidate's principal campaign committee as well as a federal political action committee (PAC) can make the maximum permissible contributions to a Cincinnati City Council candidate on behalf of both the campaign committee and the PAC. You also inquired as to the maximum permissible contribution from each of the two entities.

Article XIII, Section 1 of the Charter of the City of Cincinnati states that "a person may contribute not more than \$1,000 to any one candidate" for council or mayor. Section 7 of Article XIII provides that as used in Article XIII, "person" has the same meaning as the definition of "person" in Ohio Revised Code Section 3517.01(B)(17)(a). The definition of "person" in Section 3517.01(B)(17)(a) of the Ohio Revised Code includes a "political action committee" and also includes any "other organization or group of persons."

The Cincinnati Elections Commission interprets these definitions to mean that an individual who chairs a federal candidate's principal campaign committee as well as a federal political action committee (PAC) is entitled to make the maximum permissible contributions to a Cincinnati City Council candidate on behalf of both the campaign committee and the PAC. [This assumes that the contributions will be made in the name of the campaign committee and the PAC.] Such an individual would also be permitted to make an individual contribution on his own behalf. Therefore, for purposes of the campaign contribution limits established by Section 1 of Article XIII, the City Charter allows a federal campaign committee to make a \$1,000 contribution to a candidate for council or mayor and also allows a contribution of \$2,500 to the same candidate by a federal PAC, even if both entities are chaired by the same individual. The individual would also be permitted to contribute \$1,000 to that same candidate on his own behalf.

If you have any further questions please contact me by calling the City of Cincinnati Law Department on behalf of the Cincinnati Elections Commission at (513)352-3334.