

**INFORMAL OPINION IO-1994-019
ISSUED OCTOBER 20, 1994**

This is in response to your letter of September 16, 1994, wherein you posed the following question:

What is the maximum level for contributions to a political action committee engaged in the circulation of an initiative petition?

The Constitutional Ethics Rules [257:1-1-1 et seq. of the Rules of the Ethics Commission, 74 O.S. Supp.1994, Ch. 62, App.] speak to the issue. They provide as follows:

Contributions

(a) **Limitations on contributions from a person.**

(1) No person or family may contribute more than five thousand dollars (\$5,000) to a political action committee or a party committee in any calendar year. No political action committee or party committee shall knowingly accept a contribution from a person or family in excess of five thousand dollars (\$5,000) in a calendar year.

(2) No person or family may contribute more than five thousand dollars (\$5,000) to a candidate for state office or to a candidate committee authorized by such a candidate to accept contributions or make expenditures on his behalf during a campaign as defined in Chapter 1, Section 2. No candidate or candidate committee shall knowingly accept a contribution in excess of five thousand dollars (\$5,000) from a person or family during a campaign.

(3) *These restrictions do not apply to:*

(A) *a committee supporting or opposing a ballot measure; or*

(B) *a candidate making a contribution of his or her own funds, to his or her campaign.*

257:10-1-2(a)

[emphasis added]

The Ethics Commission Act [74 O.S. 1991, § 4200 et seq.]¹ addresses the issue as follows:

Maximum contributions

No person or family may contribute more than Five Thousand Dollars (\$5,000.00) to a committee, except for a candidate committee, in any calendar year. No person or family may contribute more than Five Thousand Dollars (\$5,000.00) to a candidate for state office or to a candidate for municipal office in a municipality with a population of over two hundred fifty thousand (250,000) persons, according to the most recent federal decennial census, or to a candidate committee authorized by such a candidate to receive contributions or make expenditures on his behalf, nor more than

¹Repealed 1995. See 21:1871

One Thousand Dollars (\$1,000.00) to a candidate for other local office or to an organization authorized by such a candidate to receive contributions or make expenditures on his behalf for a campaign. No candidate, candidate committee, or other committee shall receive contributions in excess of the amounts provided herein. *These restrictions do not apply to a committee supporting or opposing an initiative or referendum petition or a legislative referendum.*

74 O.S. 1991, § 4216

[emphasis added]

CONCLUSION

In conclusion, it is my opinion that there is no limit to the amount an individual or person can contribute to a committee formed to support or oppose a state or local question or ballot measure.

Please be aware that informal opinions are not official pronouncements of the Commission. Hence, this letter carries no greater weight than the views of any other citizen. The Commission is available to issue interpretations on matters arising from the Ethics Commission Act and the Constitutional Ethics Rules. These are known as Ethics Interpretations. They are official and bind the future action of the Commission.