



TEXAS ETHICS COMMISSION



ETHICS ADVISORY OPINION NO. 200

March 25, 1994

Whether contributions to a political committee for a seminar to help women develop influencing skills are political contributions and whether expenditures for the seminar are political expenditures for purposes of title 15 of the Election Code. (AOR-225)

A nonpartisan political committee that supports qualified women candidates plans to conduct a seminar to educate working women "on the topic of developing positive influencing skills." The seminar will not support or oppose candidates, officeholders, or measures. The political committee has asked whether contributions for the seminar are political contributions and whether expenditures for the seminar are political expenditures for purposes of title 15 of the Election Code.

A political committee is "a group of persons that has as a principal purpose accepting political contributions or making political expenditures." Elec. Code § 251.001(12). Title 15 of the Election Code regulates activities of a political committee that have to do with political contributions and expenditures. [Ethics Advisory Opinion No. 131](#) (1993). It does not regulate other activities of a political committee. *Id.*

A political committee must report political contributions that it receives. Elec. Code § 254.031. There are two types of political contributions: campaign contributions and officeholder contributions. *Id.* § 251.001(5). A campaign contribution is a contribution to a political committee that is "offered or given with the intent that it be used in connection with a campaign for elective office or on a measure." *Id.* § 251.001(3). An officeholder contribution is a contribution given to a political committee with the intent that it be used to defray expenses that are incurred by an officeholder in performing a duty or engaging in an activity in connection with that office and that are not reimbursable with public money. *Id.* § 251.001(4). A contribution given with the restriction that it be used to conduct a seminar unrelated to candidates or measures is not a political contribution.¹ Similarly, expenditures for such a seminar would not be political expenditures.²

SUMMARY

A contribution to a political committee given with the restriction that it be used to conduct a seminar unrelated to candidates or measures is not a political contribution. Similarly, expenditures for such a seminar would not be political expenditures.

¹ If funds contributed to a political committee are not restricted to a use not regulated by title 15, the treasurer of the committee must report the funds as a political contribution. [Ethics Advisory Opinion No. 131](#) (1993).

² An expenditure for such a seminar that is made from *political contributions* is reportable as a nonpolitical expenditure from political funds. Elec. Code § 254.031(4) (reported on Schedule I).