



STATE OF LOUISIANA
DEPARTMENT OF STATE CIVIL SERVICE
LOUISIANA BOARD OF ETHICS
P. O. BOX 4368
BATON ROUGE, LA 70821
(225) 219-5600
FAX: (225) 381-7271
1-800-842-6630
www.ethics.state.la.us

March 19, 2013

Maureen O'Brien
St. Tammany Parish Council, District 10
P.O. Box 577
Mandeville, LA 70470

RE: Ethics Board Docket No. 2013-172

Dear Ms. O'Brien:

The Louisiana Board of Ethics, at its March 15, 2013 Board meeting considered your request for an advisory opinion regarding whether you may use your campaign funds to pay for several organizations in which you are or will become a member of and the broadcast of your radio show. You state you have been told that campaign funds can be used for membership dues to various organizations in which you are meeting constituents and people in the community. You state that each of the organizations enable you to be in constant contact with individuals in the community representing different areas of need and concern. You have questions regarding the following organizations in which you either are a member or intend to become a member:

- Professional Republican Women of St. Tammany - was a member prior to election
- Associate membership in Mandeville Republican Women & St. Tammany Republican Men's organizations -new membership.
- Chamber of Commerce —past member as an employee of another company in which you are no longer employed.
- Rotary - new membership.
- Kiwanis- new membership.
- League of Women Voters -new membership.
- Women of infinite Possibilities - new membership.
- Home Builders Association- new membership.

Additionally you ask is it possible to attend various non -profit fundraisers using campaign funds in an effort to network with members of the community and support these vital organizations at the same time. You also state that you currently do a radio show in St. Tammany Parish and want to know whether your campaign funds may be used to pay 50% of the production cost since 75% of the show's content involves issues related to the parish council. Some of the issues discussed on the show are:

Current events in the legislature and an understanding of the various jobs in various government departments; government and politics; the Economic Development Foundation and the

Workforce Investment Board are interviewed; the East & West St. Tammany Chamber of Commerce; non - profits promote their organizations and various fund raising events; comedy segment called "Ones to Watch" featuring local talented individuals; "Ask Shannon" which gives life and relationship advice.

The Board concluded, and instructed me to advise you that the Campaign Finance Disclosure Act (CFDA) prohibits elected officials from using their campaign funds for expenditures that are not related to the holding of public office. R.S. 18:1505.2I provides that campaign funds may not be used for any personal use unrelated to the candidate's campaign or his holding of public office. This Subsection also provides that excess funds may be used for a future campaign; returned to contributors on a pro-rata basis; given as charitable contributions as provided in 26 USC 170(c) or contributions to 501(c)(3) organizations; or in support of or opposition to a proposition, political party, or candidate.

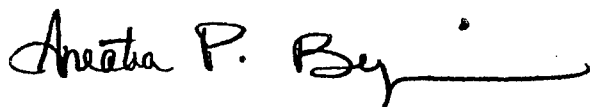
In Ethics Docket No. 91-050 the Board stated that the use of Campaign Funds to pay membership into organizations which enhance professional standing of an elected official or allow the official to remain connected with their constituency was an appropriate use of campaign funds.

It appears that all of the organizations that you list will enhance your professional standing as a member of the St. Tammany Parish Council and allow you to remain connected with your constituents. Thus, you may use your campaign funds to pay for membership into the listed organizations. Meals purchased at these meetings may be purchased with campaign funds. Additionally, Section 1505.2I will permit you to attend and make donations to non-profit 501C(3) organizations and organizations defined as charitable under 26 USC 170(c).

In regards to the radio show, you state that you took the job with the radio after you took office as a public service to the community. You felt that the radio show was much more time and constituent friendly than creating a town newsletter. You also states that 75% of the show is attributed to political issues dealing with St. Tammany Parish. As such, there is no violation of the CFDA for you to use your campaign funds to pay the proportionate percentage of production cost that is dedicated to those matters related to St. Tammany Parish.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Ethics. The Board issues no opinion as to past conduct or laws other than the Code of Governmental Ethics. If you have any questions, please contact me at (225) 219-5600 or (800) 842-6630.

Sincerely,
LOUISIANA BOARD OF ETHICS

A handwritten signature in black ink, reading "Aneatra P. Boykin". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Aneatra P. Boykin
For the Board