



Ohio Elections Commission

21 West Broad Street, Suite 600
Columbus, Ohio 43215
614•466•3205

April 4, 2000

OHIO ELECTIONS COMMISSION

Advisory Opinion 2001ELC-04

SYLLABUS: A local political party is not permitted to lump sum headquarters expenses but must list, with reasonable specificity, the object or purpose for any and all expenditures of the political party.

TO: Tom Wagner, Director
Summit County Board of Elections

You have requested an advisory opinion on the following issue:

Is a local political party permitted to lump sum headquarters expenses when all contributions and all election related expenditures are listed individually on their finance reports?

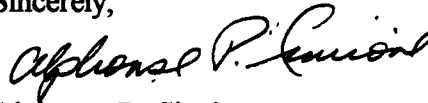
The foundation of Ohio's campaign finance reporting statutes is full disclosure of all contributions and expenditures. Ohio Revised Code §3517.10 establishes the standards for the information to be included in a campaign finance report. Division (B) of R.C. §3517.10 specifically states the manner in which each contribution and expenditure must be identified. R.C. §3517.10(B)(5)(b) & (c) require that a statement of expenditures include "the full name and address of each person, political party, ... to whom the expenditure was made" and "the object or purpose for which the expenditure was made." Emphasis added.

Both of these subdivisions speak to the required specificity that must be maintained in a campaign finance report. In R.C. §3517.10(B)(5)(b), the use of the word "each" speaks to the need to specifically identify every recipient of a payment from a campaign, party, PAC or other election related fund. Further, R.C. §3517.10(B)(5)(c) goes on to state that each specific object or purpose must be identified on a campaign finance report. To further illustrate the necessity for specificity in the area of campaign finance reporting, reference is made to Ohio Administrative Code §111-5-20(B), as promulgated by the Secretary of State. This section states that the mere payment on a credit card transaction is not sufficient, but that the expenses that make up the entirety of the credit card

transactions must be identified. This Commission believes that the requirement for such specificity is appropriate and can be applied to this question. When a political party, or any other party subject to Ohio's campaign finance laws, makes an expenditure, that expenditure must be identified to the level of object or purpose of any such expenditure.

Accordingly, it is the opinion of the Ohio Elections Commission, and you are so advised, that a local political party is not permitted to lump sum headquarters expenses but must list, with reasonable specificity, the object or purpose for any and all expenditures of the political party.

Sincerely,

A handwritten signature in cursive script that reads "Alphonse P. Cincione".

Alphonse P. Cincione
Chairman