

	Informal Opinions Approved in 2nd Quarter Calendar Year 2026 April 1 – June 30, 2026*
	*Per Administrative Rule 340-X-1-.04, informal opinions are confidential. What follows is a basic summary of the most frequently asked questions and the general answers given. This summary is not to be relied upon or to be a summary of every informal we have given. Many informals we give are on the same issue and many requests involve issues under another agency's jurisdiction to which we refer the requestor. We recommend that rather than relying on any summary contained herein, that you request your own informal opinion because the facts matter.
	Topic Summary
1.	A candidate who takes a personal bank loan and then loans the proceeds to the campaign should report it as a personal loan from the candidate. The campaign may reimburse interest only up to the amount actually charged by the bank, because any excess would be an impermissible conversion of campaign funds to personal use.
2.	A public official may participate in grant awards or other decisions involving a public entity that employs a family member because a public entity is not a business with which the official is associated, provided the family member will not uniquely benefit. Federal grant rules or other authorities may impose additional restrictions.
3.	General goodwill meetings and relationship-building that do not attempt to influence legislation, regulations, grants, or contracts are not lobbying under the Ethics Act.
4.	A public employee may operate an educational platform and make unpaid professional presentations on personal time without using public resources, confidential information, or the public position for private benefit. If the activity becomes revenue-producing or includes paid speaking or travel, additional guidance may be needed, and the former employee may not represent a private client before the former agency for two years after leaving.
5.	The Ethics Act does not prohibit a public official's spouse from volunteering without compensation to assist with administrative election duties. Election law or local policies may impose additional restrictions.
6.	A public official who owns property on a road affected by a proposed municipal decision has a financial interest in the matter and may not vote, deliberate, or otherwise participate.
7.	A former public employee may accept private employment after retirement if the opportunity was not obtained through the public position or for the purpose of influencing official action. For two years after leaving, the former employee may not interact with the former agency on behalf of a private employer or client, but may return to work for the former public entity if the position was not created or obtained through improper leverage or confidential information.

8.	The Ethics Act does not prohibit a public entity from hiring an applicant who is a step-relative of public officials because that relationship is not included in the Act's definition of family member. Other personnel or local-government rules may still apply.
9.	Public officials and public employees may accept complimentary tickets and hospitality for an event that qualifies as an educational function, widely attended event, or economic-development function, provided the benefit is not offered to influence official action.
10.	Campaign funds may be donated to a qualifying charitable organization and the donation should be reported in campaign-finance reports. The payment must be a true donation; the campaign may not receive tickets, advertising, or another benefit in return.
11.	A former public employee may return to work for the former public entity in a consulting or part-time role if the position was not created or obtained through use of the former position, confidential information, or improper influence. Retirement-system or employer rules may impose additional restrictions.
12.	A public employee may accept outside teaching work when it is outside the employee's normal public duties, performed on personal time, and obtained without use of the public position. No public equipment, facilities, materials, labor, or other resources may be used for the teaching work.
13.	A public employee may not use the public position or confidential information to help an associated business obtain a contract with the employee's agency. The employee should not personally represent the business before the agency while employed or for two years after leaving, and any contract paid with public funds must be filed with the Commission within 10 days.
14.	A public official may volunteer to campaign for another candidate and may pay personal travel expenses without creating a contribution to that campaign. Reasonable travel reimbursement from the other campaign is permissible, while reimbursement by a political action committee is an in-kind contribution that must be reported.
15.	A public agency may request businesses to provide prizes for a student contest because prizes awarded to students are not a prohibited thing of value to public officials or employees. Public officials and employees may not solicit a lobbyist or seek anything for the purpose of influencing official action, and other public-funds rules may apply.
16.	A former public employee may accept employment with a private firm if the opportunity was not obtained through the public position or offered to influence official action. For two years after departure, the former employee may not personally interact with the former agency on the firm's behalf, although other employees may handle those interactions.
17.	A former public employee may return to the former public entity in temporary or part-time employment if the position was not created or obtained through the former position, confidential information, or improper influence. Retirement-system or other employment rules may impose additional restrictions.

18.	A public official may vote and participate in a public project when the official has no financial interest in the matter. Questions governed by municipal or other law remain outside the Ethics Act.
19.	A state legislator may use campaign funds to purchase a personalized item for the legislative office because the expense is reasonably related to official duties and would not be incurred but for holding office.
20.	Tickets and access passes are not a prohibited thing of value when the public official pays full market value for them.
21.	A public official may solicit contributions to the party's political action committee if the funds are not directed to the official's own campaign and campaign-finance timing and coordination restrictions are followed. The official may not solicit lobbyists because contributions to the party committee are not campaign contributions to the official.
22.	Public employees may accept vendor-paid conference admission, travel, lodging, and related benefits from a business that is not a principal if the benefits are not offered to influence official action. Employer policies may impose additional restrictions.
23.	A principal providing a meal at a dinner where less than 12 individuals are expected to attend is subject to a \$50 per-person limit and a \$250 annual per-person limit per calendar year. If at least 12 people with diverse interests attend, the widely attended event exception may apply.
24.	A public employee who runs for office or serves in another public role may not use the current public position, public time, equipment, personnel, or other resources to benefit the campaign or other position. Whether the employee may hold both roles is governed by law outside the Ethics Act.
25.	Public officials and public employees may accept travel paid by a prospective business to tour a facility when the trip is part of an economic-development function and is not offered to influence official action. Local policies or other laws may impose additional restrictions.
26.	The Ethics Act does not require retention of ethics-training certificates. Employer records policies and state archival requirements should be consulted.
27.	Campaign funds may be used to pay or reimburse reasonable expenses for official caucus conferences, including travel, when the expenses are related to public duties, and required mileage and expense records must be maintained. Direct payment from the campaign is preferred over reimbursement, and filing mechanics should be confirmed with the election authority.
28.	A public employee may accept a \$25 restaurant gift card given as a thank-you for routine assistance in performing the employee's duties.
29.	A public official may solicit sponsorships for a nonprofit organization but may not personally solicit a lobbyist for anything other than a campaign contribution. Another representative of the nonprofit must handle any solicitation directed to a lobbyist.

30.	A former public employee may accept the proposed private employment and perform the described duties because no applicable revolving-door restriction remains under the facts presented.
31.	A former public employee may not accept employment for two years from a private entity the employee personally regulated or with which the employee participated in contract negotiations. Whether conduct constitutes direct regulation depends on the employee's discretionary authority to influence the entity's government business or compliance.
32.	Public employees may provide private plumbing services to a separate public board on personal time if they do not use either public position or public resources to obtain or perform the work. A contract paid with state, county, or municipal funds must be filed with the Commission within 10 days.
33.	A public official is not required to abstain from matters involving a public board solely because a nephew works for the board, because a nephew is not a family member under the Ethics Act. Employment by the public board also does not make it an associated business, so recusal is required only if the official would uniquely benefit.
34.	Public officials and accompanying family members may accept travel reimbursement from an organization that is not a registered principal, provided the reimbursement is not offered to influence official action. Local policies or other laws may impose additional restrictions.
35.	Municipal mayors, council members, commissioners, county commissioners, and local school-board members must complete ethics training within 120 days each time they are sworn into office. The training may be completed online or in person.
36.	A former public employee may begin work for a private contractor once two years have passed since the employee last participated in that contractor's contract terms, negotiations, or execution.
37.	A public board may adopt a policy allowing volunteers and staff to use a public facility for personal events, but the board may not create the benefit for its own members. Public-property rules outside the Ethics Act should also be reviewed.
38.	A former public employee may not accept employment for two years from a business the employee personally regulated, audited, or investigated, although the former employee may accept the business as a client if the opportunity was not obtained through the public position. For two years after leaving, the former employee may not represent any client or private employer before the former agency.
39.	Public officials and public employees may not accept sporting-event tickets, suite access, food, or drinks from a registered lobbying principal when no statutory exception applies.
40.	A public official may accept outside teaching work if the official did not use the public position to obtain the opportunity and the work does not interfere with public duties.

41.	A public official's private business may perform work for a private company on a project involving public permits if the official abstains from the public body's vote and discussions and does not use the public position to benefit the business.
42.	Public officials may pool personal funds to provide cash or non-cash employee-recognition awards if no recipient is a family member and the award is not intended to influence official action.
43.	Public employees may not solicit a thing of value from a subordinate or person with whom they directly inspect, regulate, or supervise, in their official capacity. A lease between a public employee and a subordinate or person directly supervised in the employee's official capacity must be commercially reasonable.
44.	A public employee may operate a private consulting business on personal time without using the public position, public resources, or confidential information for private benefit. Any contract paid with state, county, or municipal funds must be filed with the Commission within 10 days.
45.	Public employees may attend an appreciation event and accept food and drinks when the event is open broadly to departments and employees and is not offered to influence official action.
46.	A public official may accept sponsor-paid travel and lodging to participate in an educational function or widely attended event, provided the benefit is not offered to influence official action.
47.	A paid political advertisement must identify the entity responsible for paying for it. Whether an artificial-intelligence image or other content may be used is governed by law outside the Fair Campaign Practices Act.
48.	A public official may contact a state agency to advocate for a private entity's requested access or permit change if the official is not paid for the advocacy.
49.	No Ethics Commission disclosure is required solely because a grant recipient employs a family member of a public official. Separate employment, representation, public-contract, or family-relationship disclosure rules may apply, and the grantor's requirements should also be reviewed.
50.	For two years after leaving public employment, a former public employee may not personally represent a private business before the former agency. The business may contract with the agency if another employee handles the negotiations and agency interactions.
51.	A subsidiary that does not hire or retain a lobbyist is not automatically a lobbying principal, but it may not act as a pass-through for a principal or provide benefits to influence official action. A person who spends more than \$250 in a day while negotiating or conducting a transaction with a public official or employee in that official capacity must file an expenditure report.

52.	A public agency may distribute a private vendor's informational brochures if the vendor is not a business associated with a public official or public employee and no public official or employee receives a personal benefit. Local policies may impose additional restrictions.
53.	A business that is not a registered lobbying principal may sponsor a widely attended conference and provide related meals, receptions, educational materials, or promotional items to public officials and employees, provided the benefits are not offered to influence official action.
54.	Public employees may operate a private summer camp on personal time and rent a public-school facility if they do not use their public positions to obtain preferential access. Employer and education rules may impose additional restrictions.
55.	A public employee may take award furniture to a new public workplace if the furniture was awarded as the employee's personal property. The public employer and applicable public-property authorities should confirm ownership.
56.	When campaign services are compensated in part by allowing the service provider to stay in property owned by the candidate or spouse, the fair value of the lodging must be reported as an in-kind contribution.
57.	For two years after retirement, a former public employee may not provide the consulting services described to or negotiate a contract with the former public entity, but may perform professional services on behalf of that public entity as its representative. The former employee also may not accept employment for two years from vendors personally regulated or reviewed, although those vendors may become clients if the opportunities were not obtained through the public position. The employee may not use the current position or confidential information to secure future work.
58.	Campaign funds may be used to pay fines for campaign-finance reporting violations. A campaign committee may be dissolved if it will no longer receive contributions or make expenditures; otherwise, reporting obligations continue.
59.	A former public employee may accept employment with a private engineering firm after two years have passed since the employee last reviewed the firm's work. The former employee still may not represent the firm or any client before the former agency until two years after leaving public service.
60.	Officials covered by the municipal and local-government ethics-training requirement must complete training within 120 days of being sworn into office, regardless of prior training. The training may be completed online or in person.
61.	A state campaign committee may not use campaign funds for expenses solely related to a federal office because the Fair Campaign Practices Act recognizes only state and local offices. For mixed-purpose travel or events, campaign funds may cover only expenses that would not have been incurred but for the state candidacy; federal campaign-finance law may impose additional restrictions.
62.	A former public employee may keep award furniture if it was given as the employee's personal property. The public employer and public-property authorities should confirm that the item was not owned by the public entity.

63.	The Ethics Act does not prohibit a public agency from paying an employee's travel expenses for a work-related conference. Public-funds and employer rules outside the Ethics Act should also be reviewed.
64.	The Ethics Act does not prohibit a public employee from attending the described vendor-related conference. The employer may adopt a stricter internal policy even when the Ethics Act permits attendance.
65.	A public official may not direct public deposits or other government business to a bank that employs the official's family member, because the bank is a business with which the official is associated and would receive a personal gain from the official action.
66.	A commemorative plaque or trophy with little intrinsic value and intended solely for presentation is not a prohibited thing of value. The Ethics Act does not impose a dollar limit on such an item.
67.	A public employee may hold professional licenses and conduct private real-estate or lending work through a business on personal time, provided no public resources, confidential information, or official position are used for private benefit. Employer policies may impose additional restrictions.
68.	A nonprofit on whose board a public official's family member serves is a business with which the official is associated. If the family member is compensated, the public official may not use the public position to benefit the nonprofit.
69.	Public officials may not accept university football tickets or suite access from a public university that is a registered principal. The "paid for by a governmental-entity" exception does not cover sporting-event tickets offered by an educational institution to persons outside its faculty, staff, or administration.
70.	A business or nonprofit corporation may establish a separate segregated political fund and use it for political purposes, but may solicit contributions only from its stockholders or members, employees, and their families. The fund must file the same campaign-finance reports as a candidate committee, although a comparable federal fund may submit copies of its federal filings.
71.	The proposed consulting arrangement between a public official and a private entity is permissible under the Ethics Act, and the draft agreement adequately states the official's ethics obligations and restrictions.
72.	A former public employee may return to work for the former public university after retirement if the position was not created or obtained through the former position, confidential information, or improper influence. Retirement-system rules may impose additional restrictions.
73.	Campaign funds may be used to pay penalties assessed for violations of campaign-finance reporting requirements.
74.	State legislators may use campaign funds to purchase legislative-branded clothing when the items are primarily for official duties and would not be purchased but for holding office. Incidental non-duty use is permissible, but committee bylaws or other rules may impose additional restrictions.

75.	A public official may vote on matters involving the official's public-university employer if the matter does not uniquely benefit the official. The official should seek additional guidance if a particular matter may have a distinct personal effect.
76.	A federal political action committee that contributes to or spends on behalf of state or local candidates must register as a state political action committee and file the required reports. Political action committees may not transfer funds to other political action committees, and active committees must continue filing periodic reports.
77.	A public employee may apply for and accept prospective private employment if the opportunity is not sought or offered to corruptly influence official action and the public position is not used to obtain it. For two years after leaving, the former employee may not represent the private employer or any client before the former agency.
78.	A public official may accept travel, lodging, and meals for an educational program from an organization that is not a registered lobbying principal, provided the trip is not offered to influence official action.
79.	A public official may solicit donations for a nonprofit from the general public. The Ethics Act does not prohibit the public official from identifying themselves as the holder of a public office. The official may not solicit lobbyists and is subject to additional limits when soliciting principals, subordinates of lobbyists, or persons regulated by the official, and no public resources may be used; a broad solicitation should include an appropriate disclaimer.
80.	A public official may accept conference travel, lodging, meals, and attendance costs from the sponsoring organization when the event is educational and the benefit is not offered to influence official action.
81.	A former public official is not required to file copies of public contracts entered into by the former official's business after leaving public office.
82.	Public testimony before a legislative or regulatory body is not lobbying, and uncompensated communications with public officials generally are not lobbying. Applying for or requesting information about a grant is not lobbying, but compensated efforts to influence legislation, regulations, or the award of a state grant or contract may require registration; qualifying widely attended event meals are not subject to ordinary meal limits.
83.	A public employee may operate a private special-education advocacy business on personal time without using public resources, confidential information, or the public position to benefit the business. For two years after leaving, the former employee may not represent private clients before the former school system.
84.	A candidate committee may not allow a political-party committee to use campaign-office space for free because that would be a prohibited in-kind contribution or transfer to another political action committee.
85.	A public employee may not accept outside work from a developer or business the employee personally regulates.

86.	A candidate for a public utility regulatory commission may not accept contributions from a company that qualifies as a regulated utility or transportation company. Contributions from businesses outside those statutory categories are not prohibited by that restriction.
87.	A public employee may serve on a public school board and receive compensation from both positions if all board and campaign activities occur on personal time and neither public position or its resources is used to benefit the other. Employer policies or other laws may impose additional restrictions.
88.	A candidate committee and a political-party committee may share campaign-office space if each pays a reasonable fair-market share of the rent.
89.	A public entity may award a contract to a business owned by a public official's family member if the official does not use the public position or confidential information to help the business obtain the award. Because the business is associated with the official, the contract must be filed with the Commission within 10 days, and procurement rules outside the Ethics Act may also apply.
90.	A public employee may serve as a municipal council member while retaining public employment if campaign and council activities occur on personal time and neither public position or its resources is used to benefit the other. Employer policies or other laws may impose additional restrictions.
91.	A public employee who personally reviewed a contractor's work and determined compliance directly regulated that contractor and may not accept employment with it until two years after the last such review.
92.	A public official may accept private employment after leaving office if the offer was not made to influence official action. For two years after departure, the former official may not represent the employer or any client before the former public entity.
93.	A former public official may return to work for the former public entity if the position was not created or obtained through the former office, confidential information, or improper influence. Retirement and employment laws outside the Ethics Act may impose additional restrictions.
94.	A public employee may accept employment with a private brokerage that the employee did not directly regulate, provided the public position was not used to obtain the opportunity. After leaving, the former employee may not represent the brokerage or its clients before the former public employer.
95.	Campaign funds may be used for travel and lodging to study a project related to the duties of public office when the expenses would not be incurred but for holding office. The campaign may not pay costs reimbursed by another source.