



# Oregon

Theodore R. Kulongoski, Governor

## Oregon Government Ethics Commission

3218 Pringle Rd SE, Suite 220

Salem, OR 97302-1544

E-mail: [ogec.mail@state.or.us](mailto:ogec.mail@state.or.us)

Web Site: [www.ogec.state.or.us](http://www.ogec.state.or.us)

August 15, 2008

Matt C. Markee  
Capitol Club President  
5605 Inland Shores Way, N., #202  
Salem, Oregon 97303

Dear President Markee:

Please find enclosed one copy each of three Commission Advisory Opinions that were adopted by the Oregon Government Ethics on August 15, 2008.

These opinions were written in response to a letter dated April 21, 2008 submitted by Bruce A. Bishop on behalf of the Capitol Club. The letter presented 39 questions or statements for the Commission to either answer or confirm.

In lieu of responding to each of the 39 questions or statements, the Commission has issued the enclosed Commission Advisory Opinions numbered 08A-1003, 08A-1004 and 08A-1005. This form of response was chosen because all of the questions or statements in Mr. Bishop's letter could not be answered as presented. They could not be answered because there were too many variations and important factors were not always included in the hypothetical circumstances. As you and Capitol Club members know, the provisions of Oregon Government Ethics law may be applied to a specific set of circumstances but that application is dependent on the circumstances provided and those specific circumstances alone.

In reviewing the content of the letter there were three major areas covered by provisions of ORS Chapter 244 for which clarification was requested. Those were a legislative or administrative interest, gifts and the prohibited use of official position. In offering these Commission Advisory Opinions the 39 questions or statements in the letter are addressed in the following opinions:

Commission Advisory Opinion 08A-1003:	Questions numbered 1, 4, 7-9, 24, 31, 32, 34, 36 and 39
---------------------------------------	---

Matt C. Markee  
Capitol Club  
August 15, 2008  
Page 2

Commission Advisory Opinion 08A-1004:	Questions numbered 11-13, 18, 19, 24, 27, 30, 33, 35-37 and 39
Commission Advisory Opinion 08A-1005:	Questions numbered 2, 3, 5, 6, 10, 14-17, 19-23, 25, 26, 28, 29, 38 and 39

I appreciate the courtesies you and the Capitol Club leadership have offered in responding to this request.

Sincerely,



Ronald A. Bersin  
Executive Director

Enclosures (3)