Administration of Campaign Finance, Conflict of Interest & Lobbying Laws





901 S. Kansas Avenue Topeka, Kansas 66612 (785) 296-4219 (phone) (785) 296-2548 (fax)

## **GOVERNMENTAL ETHICS COMMISSION**

https://ethics.kansas.gov

January 13, 2020

Trevor M. Stanley BakerHostetler Washington Square 1050 Connecticut Ave. N.W. Suite 1100 Washington D.C. 20036-5403

Mr. Stanley,

We are in receipt of your letter responding to the reporting obligations of Per Aspera Policy, Inc.

After further review of the communications of which we are aware, it appears that no express advocacy, as currently interpreted by our Commission based upon Kansas statute, occurred in the space of those advertisements. As a result, you have no obligation to register as a PAC or report donors and expenditures and may disregard our December 30, 2019 letter.

If you have any further questions, don't hesitate to let us know.

Sincerely, Mark Skoglund

Executive Director

MS:sf