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CAMPAIGN FINANCE ADVISORY OPINION NO. 26-001-F

February 6, 2026

Question Presented: May an alderman use campaign funds to rent space for a town hall meeting?

Brief Answer: Yes. Under these circumstances, the use of campaign funds to rent space for a town hall meeting is reasonably related to holding public office, and the officeholder may expend campaign funds for this purpose, in accordance with Section 23-15-821(3), Miss. Code of 1972.

The Mississippi Ethics Commission issued this opinion on the date shown above in accordance with Section 23-15-821(7), Mississippi Code of 1972, as reflected upon its minutes of even date. This opinion is limited to the provisions of Section 23-15-821 regarding the personal use of campaign contributions. This opinion does not interpret or offer protection from liability for any other laws, rules or regulations. While the actions discussed in this opinion may have tax consequences, the Ethics Commission is not authorized to give tax advice, and this opinion does not constitute tax advice. The Ethics Commission based this opinion solely on the facts and circumstances provided by the requestor as restated herein. The protection from liability provided by this opinion is limited to the individual who requested this opinion and to the accuracy and completeness of these facts.

I. LAW

Section 23-15-821, Mississippi Code of 1972.

(1) The personal use of campaign contributions by any elected public officeholder or by any candidate for public office is prohibited.

(a) For the purposes of this section, "personal use" is defined as any use, other than expenditures related to gaining or holding public office, or performing the functions and duties of public office, for which the candidate

for public office or elected public official would be required to treat the amount of the expenditure as gross income under Section 61 of the Internal Revenue Code of 1986, 26 USC Section 61, or any subsequent corresponding Internal Revenue Code of the United States, as from time to time amended. "Personal use" shall not include donations to a political organization, or to a political action committee, or to another candidate.

...

(c) "Officeholder" shall mean any elected or appointed official from the beginning of his or her term of office until that person no longer holds office.

...

(3) Any expense that reasonably relates to gaining or holding public office, or performing the functions and duties of public office is a specifically permitted use of campaign contributions. Such expenditures are not considered personal use expenditures and may include, but are not limited to, the following expenditures:

(a) The defrayal of ordinary and necessary expenses of a candidate or officeholder, including expenses reasonably related to performing the duties of the office held or sought to be held;

....

II. FACTS

Facts provided by the requestor are set forth below, with identifying information redacted, and are considered a part of this opinion.

I am writing to request a Campaign Finance Advisory Opinion to obtain guidance as contemplated in Miss. Code Ann. 23-15-821(7) in regards to myself holding a town hall meeting for my constituents at a local community center in my city to discuss growth and development in town but specifically for persons of my Ward. It would be advertised on Facebook and open for all to attend. I will also allow other speakers from the community to speak to environmental issues and infrastructure concerns and allow the public to comment. I am asking if it would be acceptable to use funds from my Alderman account consisting of campaign donations for booking the community center. If this is unacceptable, I can use funds from my personal account. Thank you for your guidance in this matter.

III. ANALYSIS

Pursuant to Section 23-15-821(3), Miss. Code of 1972, "[a]ny expense that reasonably relates to gaining or holding public office, or performing the functions and duties of public office is a specifically permitted use of campaign contributions." Several particular types of use are

explicitly allowed, including campaign office expenses, donations to not-for-profit organizations and memberships in civic organizations. See Section 23-15-821(3)(b), (c) and (h). The alderman intends to rent space at a local community center to discuss matters of interest in his or her ward. The alderman states that the town hall meeting will be broadly advertised and open for all to attend. The alderman further states that the forum will include other community leaders and allow for comments from the general public.

Under these circumstances, the use of campaign funds to rent space at a local community center for the purpose of conducting a town hall meeting is reasonably related to holding public office. Town hall meetings are prevalent and generally considered a common venue for officeholders to engage their constituents on matters of local interest. Therefore, under these particular facts, the use of campaign contributions to rent space for a town hall meeting does not constitute personal use, and the officeholder may expend campaign funds for this purpose.

MISSISSIPPI ETHICS COMMISSION

BY:

Tom Hood, Executive Director and
Chief Counsel