

RECEIVED

By Office of the General Counsel at 4:23 pm, Jul 08, 2020

July 7, 2020

Federal Election Commission
Office of General Counsel
1050 First Street, NE
Washington, D.C. 20463

Re: REVISED REQUEST FOR ADVISORY OPINION

Dear Sirs:

This letter is to request an advisory opinion from the Federal Election Commission concerning the application of the Federal Election Campaign Act of 1971 and regulations as to the giveaway of free items in connection with campaign donations. A similar request for this same book was submitted and approved under AO 2014-10 when the same candidate ran six years ago, and AO 1995-46 shows similar approval.

Joan Farr for U.S. Senate is the principal campaign committee of Joan Farr for election to the United States Senate in 2020. In 2003, Joan Farr (also known as Joan Heffington at that time) wrote a book called *TEN SECRETS You Must Know Before Hiring a Lawyer*. It was published by her non-profit organization, the Association for Honest Attorneys (A.H.A!) which she founded in April, 2003. The A.H.A! operated as a 501(c)3 non-profit corporation up until April, 2019, when it was dissolved. Joan Farr had been the C.E.O. of the A.H.A! since that time and is currently a pre-litigation consultant doing business as the A.H.A!. Her book was distributed for sale on Amazon.com which currently shows out of stock; however, she personally has about 200 copies remaining. The A.H.A! had quite often given away free complimentary copies in the past. During the 2014 campaign, the Committee intended to purchase the books but never actually did. When the A.H.A! dissolved, the remaining books became her own personal property.

The Committee is proposing to give away during the campaign free complimentary copies of Joan Farr's book to financial contributors of a certain amount. The Committee will not sell the books or ask that they be purchased. It should be noted that the publisher is the same non-profit organization that was founded by the candidate and is no longer operating. The transactions described above would not constitute a personal use of campaign funds by Joan Farr, and she will not receive any proceeds from giving away the book. Furthermore, no royalties will result from the Committee's distribution of the book because they do not plan to sell the book.

The Committee wishes to confirm that the proposed activity is permissible under the Federal Election Campaign Act. Your timely response in this matter is appreciated.

Sincerely,

Joan E. Farr, Candidate
Joan Farr for U.S. Senate
P.O. Box 470001
Tulsa, OK 74147
Ph: 918.698.3289
www.JoanFarr.com

AOR001