From: Kevin Bryant
To: KREF Requests

Subject: Advisory Opinion Request — Pre-purchase & storage of signs/shirts for a 2030 County Judge/Executive campaign

Date: Friday, October 17, 2025 5:11:55 PM

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Report Suspicious

Dear Office of the General Counsel,

I'm requesting an advisory opinion under KRS 121.135 regarding whether a planned purchase constitutes an "expenditure" that triggers candidate/committee status.

I intend to seek election as McCreary County Judge/Executive in 2030. In 2025, using only my personal funds, I would like to buy yard signs and campaign T-shirts in bulk for cost savings and keep them in private storage. I would not distribute, display, or otherwise use them publicly until I formally launch the campaign closer to 2030. No one else will receive items or make expenditures on my behalf, and I will not appoint a treasurer until I'm ready to begin campaigning.

My questions:

- 1. Would the purchase and private storage of these materials—without any public distribution or display—be considered "making expenditures ... with a view to bringing about" my nomination/election under KRS 121.015(8), thereby requiring me to form a campaign committee and begin reporting now?
- 2. If not, at what point would KREF consider the activity to cross into reportable expenditures (e.g., upon first public display, distribution to supporters, or appointment of a treasurer)?

I appreciate your guidance so I can ensure full compliance.

Sincerely,

Kevin Bryant

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Sent from Yahoo Mail for iPhone