

ETHICS GUIDELINE FOR RUNNING A GOLF TOURNAMENT

Prepared by 72 ABW/JAA

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I. References

- a. AFI 36-3101, *Fundraising Within the Air Force*
- b. AFI 24-223, *Private Organizations Program*
- c. Joint Ethics Regulation, DoD 5500.7-R

II. Applicability

- a. These rules apply to all individuals seeking to host a fundraiser within the Air Force. The location of the golf tournament, whether on base or off base, does not affect the applicability of the below regulation. Failure to follow the rules may result in UCMJ violation for military members and violation of AFI 36-704, *Discipline and Adverse Actions*, for civilians. Furthermore, your Private Organization's status may be revoked by 72 FSS.

III. Who can host a fundraising golf tournament?

- a. In order to fundraise in the Air Force, you must be a Private Organization or an Unofficial Activity (PO/UO). Please check with 72 FSS/FSR, Ms. Debra Kirby, on how to become a registered Private Organization or an Unofficial activity.

IV. Soliciting donations v. commercial sponsorships

a. What is a commercial sponsorship?

- i. A commercial sponsorship is generally understood as a private entity providing goods, services, or cash donation in exchange of advertisement opportunities. Such opportunity includes, but are not limited to, banners displayed at a golf tournament, company logos in the advertisement posters, and company logo/slogan signs by the holes.

b. Who can receive a commercial sponsorship?

- i. Only 72 FSS may receive commercial sponsorships. As such, a PO/UOs may not solicit commercial sponsorship. Likewise, "Services may not co-sponsor events with POs... for the purpose of obtaining commercial sponsorship, contributions, donations, gifts, advertising or generating revenue for them." [AFI 34-223, para. 10.15.1.1]
- ii. POs may not engage "in any conduct which has the effect of advertising for, making referrals to, or encouraging use of any commercial business concerns." [AFI 34-223, para. 10.9.3]

c. What is a donation?

- i. Donations are gifts given to the PO. Gifts are anything of value.

V. Guide on Soliciting Donations

a. Where can I solicit for donations?

- i. Donations may only be solicited off-base. [AFI 34-223, para 10.15.1.3]

b. Who can I solicit donations from?

- i. Any company/organization that is not a prohibited source.
 - 1. Prohibited sources are generally any person who: (1) Is seeking official action by the Air Force; (2) Does business or seeks to do business with the Air Force; (3) Conducts activities regulated by the Air Force; (4) Has interests that may be substantially affected by performance or nonperformance of the person working for the Air Force; or (5) Is an organization a majority of whose members are described in paragraphs (d) (1) through (4) of this section. Examples of prohibited Sources are Boeing, Chromalloy, and Northrop Grumman.

c. Who can I accept donations from?

- i. Anyone who is not a prohibited source, or someone who is making the donation because of your status, authority, or duties associated with the Air Force.

d. How can we ask for donations?

- i. You can ask for donations through word of mouth, e-mail, or via letter correspondence.
- ii. Off-base solicitations must clearly indicate that they are for a PO or an unofficial activity/organization, and not for the base or any official part of the Air Force.
 - 1. Any print material produced must include the language, “THIS IS A PRIVATE ORGANIZATION. IT IS NOT A PART OF THE DEPARTMENT OF DEFENSE OR ANY OF ITS COMPONENTS AND IT HAS NO GOVERNMENTAL STATUS” per AFI 34-223, para 10.1.2.3.
 - 2. You cannot wear your uniform, use your rank, or use Air Force letterhead when approaching third parties for donation. You may also not use your DSN number, or government email when soliciting for your tournament. This gives the appearance that your Private Organization is an official part of the Department of Defense.
 - 3. A sample donation letter can be found on appendix A.

e. How can we recognize the gift giving organization/company?

- i. Donor/gift recognition may not be made publicly. [AFI 34-223, para 10.19.1.3]. However, recognition of the gift or donation can be made to members of the PO or those present at an event benefiting from the donation/gift. *Id.*

f. What if we received donations from an improper source?

- i. If you have received donation from a prohibited source, the donation must be returned to the sender. Please refer to the sample return letter found on appendix B.

VI. Permissible/Impermissible form of advertisement for your tournament

a. Permissible form of advertisement

- i. Word of mouth, physical posting of fliers with the proper disclaimer, social media postings

b. Impermissible form of advertisement

- i. Using government e-mails to distribute fliers, or government resources to produce advertisement materials

**** Please contact 72 ABW/JAA for further assistance or questions on ethical guidelines.
The legal office can be reached at 739-5811.****

Attachment:

1. Appendix A. Sample Solicitation Letter
2. Appendix B. Sample Return of Gift Letter

Appendix A. Sample Solicitation Letter:



WILDCATTER LEGAL BOOSTER CLUB

1111 Air Depot Street, SW Wing, Bldg 250

Tinker AFB OK 73145

Dear (business name),

I am reaching out to you on behalf of Wildcatter Legal Booster Club. The purpose of our booster club is to raise morale among the legal office members of the 72 ABW/JA. We are not part of the Department of Defense and has no governmental status.

The Wildcatter Legal Booster Club is seeking your organization's assistance in helping us run our fundraising golf tournament that will be hosted on XX August 20XX. We are seeking both monetary contribution as well as food/drink donation that we can utilize on this day. Your contribution will be greatly appreciated by us and those who will participate in the tournament. Your gift/donation will be recognized by the attendees on the day of the tournament.

You may send checks of your monetary contribution to Ms. Betty Brown, at 1111 Air Depot Street, SW Wing, Bldg 250, Tinker AFB OK 73145. Please make the check out to Wildcatter Legal Booster Club. You may also contact Ms. Brown at 405-123-2345 or via e-mail at BettybrownWLBC@gmail.com to coordinate non-monetary contributions.

We thank you for your support in advance.

Sincerely,

//Signed

Mr. Atticus Adams

Vice President of Wildcatter Legal Booster Club

AtticusadamsWLBC@gmail.com

“THIS IS A PRIVATE ORGANIZATION. IT IS NOT A PART OF THE DEPARTMENT OF DEFENSE OR ANY OF ITS COMPONENTS AND IT HAS NO GOVERNMENTAL STATUS”

Appendix B. Sample Return of Gift letter:



WILDCATTER LEGAL BOOSTER CLUB

1111 Air Depot Street, SW Wing, Bldg 250
Tinker AFB OK 73145

Dear (business name),

I am reaching out to you on behalf of Wildcatter Legal Booster Club. On (date), your company has provided us with a donation totaling (dollar amount). We are obligated to return this amount under the Joint Ethics Regulation. In order for our Private Organization to come in compliance to 5 CFR 2635.205, *Proper Disposition of Prohibited Gifts*, we are requesting that you provide us with a name and address that we can send you a check with the amount of original contribution.

Please let us know if you have any questions.

Sincerely,

//Signed

Mr. Atticus Adams

Vice President of Wildcatter Legal Booster Club

AtticusadamsWLBC@gmail.com

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OR ANY OF ITS COMPONENTS AND IT HAS NO GOVERNMENTAL STATUS”**