



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**STATEMENT OF COMMISSIONER SHANA M. BROUSSARD REGARDING PETITIONS
FOR RULEMAKING
REG 2014-09 (Federal Contractors) and REG 2015-04 (Independent Spending by
Corporations, Labor Organizations, Foreign Nationals, and Certain Political Committees
(Citizens United))**

Today the Commission considered Petitions for Rulemaking and Notices of Disposition in two matters. The Petition for Rulemaking in REG 2014-09 (Federal Contractors) was received by the Commission on November 18, 2014. The other two Petitions for Rulemaking, considered together as REG 2015-04 (Independent Spending by Corporations, Labor Organizations, Foreign Nationals, and Certain Political Committees (Citizens United)), were received on June 19 and June 22, 2015. After publishing Notices of Availability¹ for the Petitions in the Federal Register and accepting public comment for 60 and 90 days, respectively, the Commission voted on motions to initiate rulemakings in both matters. Both motions failed to garner sufficient votes to open a rulemaking.²

Since these votes were taken in 2015, the Commission has not taken any further action on these Petitions. While I support opening a rulemaking on these issues, I believe that the passage of time and the apparent lack of interest among some commissioners to move forward on these matters over the past seven years counsel in favor of disposing of these Petitions. This will preserve agency resources for other matters for which there is sufficient Commission support. Additionally, the campaign finance landscape has changed significantly over the past seven years. It may be that public comments submitted today would support rulemakings on these matters, but with a different scope or considerations than those submitted seven years ago. My votes today are not a reflection of my substantive views on these important issues. If any member of the public wishes to submit another Petition for Rulemaking on these or other issues, I welcome the opportunity to consider them anew.

March 24, 2022

Date

A handwritten signature in blue ink that reads "Shana M. Broussard".

Shana M. Broussard
Commissioner

¹ Rulemaking Petition: Federal Contractors, 80 Fed. Reg. 16,595 (Mar. 30, 2015); Rulemaking Petition: Independent Spending by Corporations, Labor Organizations, Foreign Nationals, and Certain Political Committees (Citizens United), 80 Fed. Reg. 45,116 (July 29, 2015).

² Certification, Motion to Open a Rulemaking on REG 2014-09 in Response to Public Comment (Nov. 13, 2015); Certification, Motion to Open a Rulemaking in REG 2015-04 in Response to Public Comment (Dec. 18, 2015).