

**AO Quick Reference Guide
for
Trade Association PACs, Part 1**

(All AOs can be located on the FEC's website at <http://saos.fec.gov/saos/searchao>.)

Elements of a Solicitation

AO 1979-13 Raymond International Inc. Employees' PAC

When a Communication is Not a Solicitation

AO 1991-03 TEX/CON Oil and Gas Company and TEX/CON Oil and Gas Company PAC

AO 1983-38 DuPont Good Government Fund

AO 1982-65 Union Carbide Corporation and Union Carbide Corporation PAC

Definition of Member (for Labor/Trade/Membership PACs)

AO 2013-08 American Veterinary Medical Association

AO 2008-21 CME Group, Inc.

AO 2003-13 American Academy of Ophthalmology PAC

Restricted Class of a Trade Association's PAC

AO 2014-17 Berkadia Commercial Mortgage LLC

AO 2013-06 DSCC

AO 2012-02 Wawa, Inc.

AO 2011-25 Atlas Air

AO 2010-04 Wawa

AO 2004-32 Spirit Airlines, Inc.

AO 1999-20 Equitable Companies, Inc. PAC

AO 1993-16 Blue Cross of California

AO 1980-102 Fru-Con Corporation PAC

Board of Directors

AO 2010-12 Proctor & Gamble Company and Proctor & Gamble Company Good Government Committee

AO 2000-10 America's Community Bankers Community Campaign Committee

AO 1985-35 Weirton

AO 1977-18 Proprietary Industry PAC

Prior Approval by Corporate Members of Trade Association

AO 2000-22 Air Transport Association of American, American Land Title Association, Council of Insurance Agents and Brokers, Independent Insurance Agents of America, Society of Independent Gasoline Marketers of America

AO 2000-10 America's Community Bankers Community Campaign Committee

AO 1984-61 Society of American Florists

Voluntary Contributions and Solicitation Notices

AO 2006-17 Berkeley Electric Cooperative, Inc.
AO 2003-06 Public Service Enterprise Group, Inc.
AO 1997-25 Hughes Electronics Corporation

Corporations Acting as Members of Trade Associations

AO 2003-22 American Bankers Association

Payroll Deduction

AO 2000-11 Georgia-Pacific Corporation
AO 1999-33 MediaOne PAC

No Reverse Checkoff

AO 2001-04 Morgan Stanley Dean Witter & Co. PAC (fn. 4)

Electronic Authorizations

AO 2001-04 Morgan Stanley Dean Witter & Co. PAC
AO 1999-03 Microsoft Corporate PAC
AO 1997-09 Chicago Board of Trade

Telephone Recorded Conversations

AO 2013-12 Service Employees International Union (SEIU) and SEIU Committee on Political Education

Corporations Owned by Members of Trade Associations

AO 2012-15 American Physical Therapy Association

Scenario #1: Payroll Deduction and Fundraising Events by Trade Association

AO 2003-05 National Association of Home Builders
AO 1981-40 Bache Halsey Stuart Shields Incorporated
AO 1981-33 Astoria Federal Savings and Loan Association
AO 1980-50 United Merchants and Manufactures, Inc. Manufacturing Division Committee for Responsible Government

Promotional Items and One-Third Rule

AO 2003-33 Anheuser-Busch Companies, Inc.
AO 1999-31 Oshkosh Truck Corporation and Oshkosh Truck Corporation Employees' PAC
AO 1995-17 National Association of Realtors PAC
AO 1980-50 United Merchants and Manufacturers, Inc. Manufacturing Division Committee for Responsible Government

Member-Provided Assistance

AO 1995-17 [National Association of Realtors PAC](#)
AO 1989-18 [Association of Independent Colleges and Schools PAC](#)

Ongoing Events

AO 1999-31 [Oshkosh Truck Corporation and Oshkosh Truck Corporation Employees' PAC](#)

Elements of a Solicitation

AO 1979-66 [Associated General Contractors PAC](#)
AO 1979-13 [Raymond International Inc. Employees' PAC](#)

When a Communication is Not a Solicitation

AO 1991-03 [TEX/CON Oil and Gas Company and TEX/CON Oil and Gas Company PAC](#)
AO 1983-38 [DuPont Good Government Fund](#)
AO 1982-65 [Union Carbide Corporation and Union Carbide Corporation PAC](#)

Web Pages

AO 2006-03 [Whirlpool Corporation PAC](#)
AO 2000-07 [Alcatel USA, Inc.](#)

Contributor Screening and Vetting

AO 2011-13 [Democratic Senatorial Campaign Committee](#)

Collecting Online Contributions via Credit Cards/Electronic Checks/Online Banking Services

AO 2007-17 [Democratic Senatorial Campaign Committee](#)
AO 1999-36 [Campaign Advantage](#)
AO 1999-09 [Bill Bradley for President, Inc.](#)
AO 1999-03 [Microsoft Corporate PAC](#)
AO 1995-09 [NewtWatch PAC](#)

Email Solicitations

AO 2000-07 [Alcatel USA, Inc.](#)
AO 1995-33 [Coastal Employee Action Fund](#)

Solicitations via Text Message

AO 2012-35 Global Transactions Services Group, Inc.
AO 2012-31 AT&T Inc.
AO 2012-30 Revolution Messaging
AO 2012-28 CTIA
AO 2012-26 m-Qube II
AO 2012-17 m-Qube I

Scenario #2: Email Newsletter Articles

AO 2006-17 Berkeley Electric Cooperative, Inc.
AO 2003-06 Public Service Enterprise Group, Inc.
AO 1997-25 Hughes Electronic Corporation