

**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>.)*

**Administrative Accounts of Trade Associations**

AO 1992-20 American Speech Language Hearing Association  
AO 1990-04 American Veterinary Medical Association PAC  
AO 1982-61 Association of Trial Lawyers of America

**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

**With Prior Approval Corporate Member's Restricted Class**

AO 2014-17 Berkadia Commercial Mortgage

### **Prior Approval by Corporate Members of Trade Association**

AO 2000-22	<u>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</u>
AO 2000-10	<u>America's Community Bankers Community Campaign Committee</u>
AO 1984-61	<u>Society of American Florists</u>

### **Voluntary Contributions and Solicitation Notices**

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

### **Corporations Acting as Members of Trade Associations**

AO 2003-22	<u>American Bankers Association</u>
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### **Payroll Deduction**

AO 2000-11	<u>Georgia-Pacific Corporation</u>
AO 1999-33	<u>MediaOne PAC</u>

### **No Reverse Checkoff**

AO 2001-04	<u>Morgan Stanley Dean Witter &amp; Co. PAC (fn. 4)</u>
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### **Electronic Authorizations**

AO 2001-04	<u>Morgan Stanley Dean Witter &amp; Co. PAC</u>
AO 1999-03	<u>Microsoft Corporate PAC</u>
AO 1997-09	<u>Chicago Board of Trade</u>

### **Telephone Recorded Conversations**

AO 2013-12	<u>Service Employees International Union (SEIU) and SEIU Committee on Political Education</u>
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### **Corporations Owned by Members of Trade Associations**

AO 2012-15	<u>American Physical Therapy Association</u>
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### **Scenario #1: Payroll Deduction and Fundraising Events by Trade Association**

AO 2003-05	<u>National Association of Home Builders</u>
AO 1981-40	<u>Bache Halsey Stuart Shields Incorporated</u>
AO 1981-33	<u>Astoria Federal Savings and Loan Association</u>

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