

**AO Quick Reference Guide
for
Corporate PACs, Part 1**

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

What is a Solicitation

AO 1979-13 Raymond International Inc. Employees' PAC

Restricted Class of a Corporation's PAC

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
AO 1985-35 Weirton
AO 1977-18 Proprietary Industry PAC

Stockholders

AO 1998-12 Ashland PAC

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

Scenario #1: Payroll Deduction and Fundraising Events by Corporation

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

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

What Constitutes 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