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The FEC Record is produced by  
the Information Division, Office of  
Communications.

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## Commission

### Two New FEC Commissioners Assume Office

Lee E. Goodman and Ann M. Ravel have assumed their new roles as Commissioners of the Federal Election Commission.

Commissioner Goodman, a Republican, replaces Vice Chairman Donald F. McGahn, who left the Commission in September. He was appointed by President Barack Obama on October 21, 2013, and sworn into office on October 22, 2013. On October 31, his colleagues elected him to serve as Vice Chairman of the Commission for the balance of 2013.

Prior to joining the Commission, Mr. Goodman practiced election law in private practice for the better part of two decades and served in a number of governmental and political posts. In private practice, he represented candidates, public officials, political parties, political action committees, non-profit organizations, and media companies in addressing a wide range of laws regulating their political activities and speech. He advised four presidential campaigns from 2007 to 2012. He was recognized as a national expert in close elections, recounts and election administration. He served as general counsel of the Republican Party of Virginia (2009-2013). He also represented non-political clients in addressing other regulatory and public policy issues.

His prior government service includes four years as legal counsel and policy advisor to the Governor of Virginia (1998-2002) and three years as counsel and special assistant to the Attorney General of Virginia (1995-1997). He served as chief advisor to the Chairman of the Congressional Advisory Commission on Electronic Commerce (1999-2000).

Mr. Goodman has authored several articles on election law, including a chapter on regulation of political speech on the Internet in the book *Law and Election Politics – The Rules of the Game* (Routledge 2013), and he has lectured frequently on election law topics. He also has served on the boards of several political, educational and cultural non-profit organizations.

He received his B.A. with highest distinction in 1986 from the University of Virginia, where he double majored in American Government and Rhetoric & Communication Studies. He received his J.D. in 1990 from the University of Virginia School of Law, where he served as Articles Editor for the U.Va. Journal of Law & Politics.

Commissioner Ravel, a Democrat, replaces Commissioner Cynthia L. Bauerly, who left the Commission in February. Commissioner Ravel was sworn in on Friday, October 25. Her term will expire on April 30, 2017.

From March 2011 until her appointment to the Commission, Ms. Ravel served as Chair of the California Fair Political Practices Commission (FPPC), to which Governor Edmund G. Brown, Jr. appointed her. At the FPPC, Ms. Ravel oversaw the regulation of campaign finance, lobbyist registration and reporting, and ethics and conflicts-of-interest related to officeholders and public employees. During her tenure at the FPPC, Ms. Ravel was instrumental in the creation of the States' Unified Network (SUN) Center, a web-based center for sharing information on campaign finance.

Before joining the FPPC, Ms. Ravel served as Deputy Assistant Attorney General for Torts and Consumer Litigation in the Civil Division of the United States Department of Justice. Ms. Ravel also worked as an attorney in the Santa Clara County Counsel's Office, ultimately serving as the appointed County Counsel from 1998 until 2009. Ms. Ravel represented the County and its elected officials, provided advice on the state Political Reform Act, and initiated groundbreaking programs in elder abuse litigation, educational rights, and consumer litigation on behalf of the Santa Clara County government and the community.

Ms. Ravel has served as an elected Governor on the Board of Governors of the State Bar of California, a member of the Judicial Council of the State of California, and Chair of the Commission on Judicial Nominees Evaluation. In 2007, the State Bar of California named Ms. Ravel Public Attorney of the Year for her contributions to public service.

Ms. Ravel received her B.A. from the University of California, Berkeley and her J.D. from the University of California, Hastings College of the Law.

*(Posted 11/22/2013; By: Dorothy Yeager)*

**Resources:**

- [Commissioners Home Page](#)
- [About the FEC](#)

## Regulations

### **Draft Interpretive Rule Regarding Date of Nominations for New York Special Primary Elections**

On November 22, 2013, the Commission posted for public comment a draft interpretive rule to clarify that—consistent with state law—the date of a special primary election in New York is the date on which the political party committee votes to nominate the

party's candidate for the special election, and not the date on which the certification of that vote is filed.

Comments on the draft interpretive rule are due by Noon (EST), December 4, 2013.

### **Background**

Under the Federal Election Campaign Act (the Act) and Commission regulations, a special primary election is an election, convention, or caucus with the authority to nominate candidates in accordance with applicable state law for a subsequent general election that is held to fill a vacancy in a federal office. See 2 U.S.C. §431(1)(A),(B) and 11 CFR 100.2(c)(1) and (f). New York election law generally provides that "[p]arty nominations for an office to be filled at a special election shall be made in the manner prescribed by the rules of the party." [N.Y. Elec. Law 6-114](#). New York Democratic and Republican State party committee rules provide that the county committees within a vacant congressional district nominate candidates for a special election to the U.S. House of Representatives, and that the state committees nominate candidates for a special election to the U.S. Senate. See *Party Rules New York State Democratic Committee, Art. VI, Sec. 2* (2012); *Rules of the New York Republican State Committee, Art. VII, Rule 1* (June 9, 2011). Also, if a vacancy in an elected office occurs too late for candidates to participate in a regularly scheduled primary, New York election law requires a party to nominate its candidate by a vote of the appropriate state or county party committee. See N.Y. Elec. Law 6-116. After a party committee votes to nominate a candidate, a "certificate of nomination shall be filed" with the appropriate election board certifying the committee's vote. Id.; see also *id.* 6-144, 6-156.

Based on those legal provisions and party rules, candidates in New York are placed on the general election ballot "in accordance with applicable state law" as "a direct result" of the relevant party committee vote. See 11 CFR 100.2(c)(1). Accordingly, the party committee vote in these situations is a "primary election" within the meaning of the Act and Commission regulations. See Advisory Opinions (AOs) [2004-20](#) (Farrell for Congress) and [1992-25](#) (Owens for Senate Committee). Although the party's subsequent filing of a certification formalizes the nomination, such a filing is not the primary election itself. See [FEC v. Citizens for Senator Wofford](#), No. 1:CV-94-2057, slip op. at 8-10 (M.D. Pa. Sept. 27, 1995).

To the extent that other states' nominating procedures for special elections are materially indistinguishable from those of New York, the Commission anticipates that this interpretation would apply to such other states as well.

### **Instructions for Commenting**

The draft interpretive rule was [published on the Commission's website](#) on November 22, 2013. Public comments are due by Noon (EST) on December 4, 2013, and should be addressed to the Commission Secretary, 999 E Street, NW, Washington, DC 20463, via fax to 202-208-3333 or email to [secretary@fec.gov](mailto:secretary@fec.gov). All comments should reference Agenda Document 13-48.

(Posted 11/25/2013; By Dorothy Yeager)

### **Resources:**

- [Draft interpretive rule \[PDF\]](#)
- [Commission consideration of Draft](#) 

# Litigation

## ***Combat Veterans for Congress PAC v. FEC***

On September 30, 2013, the U.S. District Court for the District of Columbia granted the FEC's Motion for Summary Judgment in *Combat Veterans for Congress PAC v. FEC*.

### **Background**

Combat Veterans for Congress PAC ("CVCP") is a nonconnected federal PAC. On October 19, 2009, CVCP registered with the FEC and named Michael Curry as both Treasurer and Custodian of Records.

Around the time of the 2010 general election, CVCP submitted three reports to the FEC after the filing deadlines. As a result, the Commission began administrative enforcement proceedings against CVCP and found reason to believe that CVCP and its treasurer, in his official capacity, violated 2 U.S.C. § 434(a) by failing to file the reports on time. The Commission proposed fines totaling \$8,690 for the violations.

Captain Joseph John, Chairman of CVCP, challenged the Commission's findings by asserting that the conduct of Mr. Curry, who had since resigned as treasurer, made it impossible for CVCP to file its reports on time. CVCP also argued that the penalties should not be imposed because Mr. Curry was solely liable in his personal capacity for the conduct that resulted in the fines. The Commission confirmed the penalties against CVCP and its successor treasurer David Wiggs, in his official capacity, in a Final Determination dated October 27, 2011.

CVCP and Mr. Wiggs filed a Petition for Review with the district court on December 7, 2011 arguing, among other things, that Mr. Curry was solely liable in his personal capacity for failing to file the reports on time; that the Commission's failure to mitigate the penalties was an abuse of discretion; that the regulations limiting the acceptable excuses for failure to file a report are unnecessarily narrow; and that the Commission failed to provide CVCP an in-person hearing.

### **Court Decision**

In rejecting CVCP's first argument, the court found no evidence that Congress intended to impose liability on treasurers in their personal capacity to the exclusion of committees and treasurers in their official capacity. The court noted that the clear text of the Federal Election Campaign Act (the "Act") and Commission regulations require political committees *and* treasurers to file periodic reports of receipts and disbursements. See 2 U.S.C. 434(a)(1) and (4); 11 CFR 104.5(c). The court also noted the Commission's policy and practice is to name as respondents in enforcement matters the political committee and its current treasurer, in his or her official capacity as treasurer and agent of the committee. Although the Commission could find a treasurer personally liable due to willful or reckless acts, the court concluded that FECA would not prohibit simultaneous liability for committees and treasurers in their official capacity.

The court also deferred to the FEC's decision not to prosecute Mr. Curry in his personal capacity citing the Commission's considerable prosecutorial discretion and no evidence that the Commission abused its discretion. The court noted that the case before it was

not the proper vehicle for CVCP to challenge the Commission's failure to take action against Mr. Curry because such challenges were available only under 2 U.S.C. § 437g(a) (8)(A). But even if such a challenge were proper here, the FEC held broad discretionary power in deciding whether to investigate and pursue a claim under the Act. The court also rejected CVCP's arguments that the FEC failed to mitigate the CVCP fines, finding the fines compliant with statutory guidelines, and similarly rejected CVCP's argument that the FEC's best efforts regulations are arbitrary and capricious.

Finally, the court rejected CVCP's various claims of Constitutional violations, finding them undeveloped and unsupported. It also rejected CVCP's claim that it was unlawful for the Commission to decline to grant an in-person hearing, finding that the phrase "opportunity to be heard" can be interpreted to include not merely oral, but written advocacy, and that a decision regarding the need for an in-person hearing is properly left to the agency.

Date Issued: 9/30/2013; 30 pages  
U.S. District Court for the District of Columbia: Case 11-2168 (CKK)

*(Posted 11/5/2013; By Zainab Smith)*

**Resources:**

- [District Court Opinion](#) (9/30/2013) [PDF]
- [Combat Veterans for Congress PAC v. FEC Ongoing Litigation Page](#)
- [Statement of Policy \(1/30/2005\): Naming Treasurers in Enforcement Matters](#) [PDF]
- [Administrative Fine Program](#)

## Advisory Opinions

### **AO 2013-11 – Senate Candidate May Use Campaign Funds for Lawsuit Expenses**

A lawsuit involving former Senate candidate Joseph Miller would not have existed irrespective of his candidacy. As a result, his campaign committee, Citizens for Joe Miller, may use campaign funds as a deposit with a state court while appealing a judgment that awarded attorneys' fees to the plaintiff. The prevailing party will have the right to apply the funds deposited in satisfaction of the judgment should the appeal be unsuccessful.

#### **Background**

Joseph Miller was a candidate for U.S. Senate from Alaska in 2010. During the campaign, four media outlets sought access to Miller's employment records from his years as an attorney for the Fairbanks North Star Borough. The Borough refused to provide some of the documents without Mr. Miller's consent, which he did not provide. Mr. Miller intervened as a defendant in the case to protect his privacy rights and filed cross-claims against the Borough and a third party claim against its mayor.

The media outlets successfully challenged the Borough in court, and the records were released prior to the election. Subsequently, all of the media outlets but one waived their rights to attorney fees and were dismissed from the case. The *Alaska Dispatch* remained and was an active participant in the proceedings on Mr. Miller's cross-claims and third party claim. Notwithstanding the later success of Mr. Miller's cross claim and third party claim against the Borough and its mayor, the judge ordered him to pay \$85,435 in attorney fees to the *Dispatch* as the prevailing party in the entirety of the litigation. Mr. Miller filed a timely appeal of the award against him and asked the Commission if he could use campaign contributions to pay for the required cash deposit or supersedeas bond pending the appeal. Those funds could be applied toward the potential judgment if the appeal is unsuccessful.

### **Analysis**

The Federal Election Campaign Act (the Act) prohibits the "personal use" of campaign contributions by any person. 2 U.S.C. §439a(b)(1) and 11 CFR 113.2(e).

The Act identifies six categories of permissible uses of contributions accepted by a federal candidate. 2 U.S.C. §439a(a); *see also* 11 CFR Part 113. These permissible uses include: (1) "otherwise authorized expenditures in connection with the [candidate's] campaign for Federal office,"; (2) "ordinary and necessary expenses incurred in connection with the duties of the individual as a holder of Federal office"; and (3) "any other lawful purpose" that does not constitute conversion to "personal use." 2 U.S.C. §439a(a)(1), (2), (6), (b); *see also* 11 CFR 113.2. Conversion to personal use occurs when campaign funds are used "to fulfill any commitment, obligation or expense ... that would exist irrespective of the candidate's election campaign or ... duties as a holder of Federal office." 2 U.S.C. §439a(b)(2); *see also* 11 CFR 113.1(g). Commission regulations provide that the Commission determines on a case-by-case basis whether the use of campaign funds to pay "legal expenses" falls within the definition of "personal use." 11 CFR 113.1(g)(1)(ii)(A).

The media inquiries that led to the initial lawsuit arose solely from Mr. Miller's candidacy. Since the post-election phase of the litigation was inextricably linked to that initial lawsuit, his campaign committee may use its funds to post a cash deposit with the court pending the appeal of the court's decision and the prevailing party may apply those funds toward the judgment should the appeal be unsuccessful.

Date Issued: October 31, 2013; 9 pages.

*(Posted 11/14/2014; By: Alex Knott)*

### **Resources:**

- [Advisory Opinion 2013-11](#) [PDF]
- [Commission consideration of Advisory Opinion 2013-11](#) 

## **AO 2013-13 Joint Fundraising Disclaimers Must List Participating Candidates**

Freshman Hold'em, a joint fundraising committee (JFC), must list its participating federal candidates in required disclaimers on public messages. Merely disclosing the joint fundraising committee's shortened name and website URL does not give the public enough information to identify the candidates paying for the communications.

### **Background**

Freshman Hold'em, Stutzman for Congress, Gardner for Congress 2012, Tom Reed for Congress, Denham for Congress, Benishek for Congress, Inc., Rodney for Congress, Duffy for Congress, Chris Gibson for Congress, Friends of Joe Heck, Friends of Dave Joyce, Pat Meehan for Congress, Scott Rigell for Congress, Rothfus for Congress, Jon Runyan for Congress, Inc., VoteTipton.com, Valadao for Congress, and Walorski for Congress Inc. Joint Fundraising Committee is a joint fundraising committee currently raising funds on behalf of 18 participating candidates and a nonconnected political committee. The Committee asks whether it may list only "Freshman Hold'em JFC" and the URL of its website in the required disclaimers on emails, web pages and other printed solicitations.

### **Analysis**

Under the Federal Election Campaign Act (the Act) and FEC regulations, campaign committees, PACs, party committees and other groups that are not separate segregated funds may engage in joint fundraising. The participants may establish a separate political committee to serve as the joint fundraising representative or one of the participating committees may act in that capacity. 11 CFR 102.17(a).

The Act and regulations require all political committees to include disclaimers on their (1) "public communications;" (2) electronic mail of more than 500 substantially similar communications; and (3) websites available to the general public. 11 CFR 100.26 and 110.11. The disclaimer must identify who paid for the message and indicate whether it was authorized by a candidate's campaign.

Freshman Hold'em JFC's proposal to use only "Freshman Hold'em" and its URL to identify itself in its disclaimers on its public messages would not satisfy the disclaimer requirements because it would not "give the reader ... adequate notice of the identity of the person or political committee that paid for ... the communication." 11 CFR 110.11 (c)(1). The participating candidates must be listed.

*Date Issued: November 14, 2013; 4 pages.*

*(Posted 11/20/2013: By: Alex Knott)*

### **Resources:**

- [Advisory Opinion 2013-13 \[PDF\]](#)
- [Commission consideration of Advisory Opinion 2013-13](#) 
- Brochure: [Special Notices on Political Ads and Solicitations](#)

## **AO 2013-16: Nonprofit May Use Donor Data to Facilitate Contribution Refunds**

PoliticalRefund.org ("PoliticalRefund") may use information from FEC reports to inform certain individual donors of their right to seek refunds of their contributions to federal candidates and may help to facilitate those refunds. PoliticalRefund may also post aggregate refund statistics on its website and accept paid advertising and sponsorship to offset its costs.

### **Background**

PoliticalRefund is a non-profit organization whose mission is "to provide political campaign contributors a simple, user-friendly means to request a refund of their contributions." It plans to focus on contributions made to officeholders "whose dramatically shifting issue positions or scandals" might make contributors want a refund of their contributions. To identify and contact those contributors, PoliticalRefund will use data from reports filed with the Commission and posted on the Commission's website. It will also use an outside vendor to help gather additional contact information, such as email addresses. According to the request, the vendor will destroy its records of a contributor's contact information after sending them to PoliticalRefund to prevent any further use, and PoliticalRefund will likewise destroy a contributor's information once it contacts that individual. It will not retain, sell or otherwise use that information.

Once PoliticalRefund has contact information for individuals who have contributed to a particular campaign, it will send them a letter, postcard or email to inform them of their right to request a refund. PoliticalRefund will help contributors request a refund (if they choose to do so) by providing a refund request form to send to the campaign and--with contributor permission--by following up with the campaign about the contributor's request. Contributors will only be contacted once for each candidate they contribute to in a given election cycle (unless they ask to be contacted more frequently) and they will not be asked to make donations to help fund PoliticalRefund's activities. PoliticalRefund plans to accept advertising and sponsorship to cover its costs, but it will not accept advertising or sponsorship from candidates, political committees or any group that is primarily involved in political activities.

PoliticalRefund will display on its website the total number of individuals who have requested a refund as well as the total dollar amount requested from specific committees and from all committees combined.

### **Analysis**

Under the Federal Election Campaign Act ("the Act") and Commission regulations, individual contributor information disclosed on FEC reports cannot be used for solicitations or other commercial activity. 2 U.S.C. §438(a)(4); 11 CFR 104.15(a).

In previous advisory opinions the Commission has determined the solicitation and commercial purpose prohibition does not necessarily prevent the use of such information for other purposes, even political ones, that are not commercial and do not involve a solicitation. See Advisory Opinions (AOs) [2009-19](#) (Club for Growth), [1984-02](#) (Gramm), and [1981-05](#) (Findley).

The Commission determined that PoliticalRefund's proposed use of individual contributor information would not violate the Act, because it would not be used for commercial purposes or to solicit contributions or donations. The safeguards for donor information and limited contact with individual contributors are consistent with the limits set out in AO 2009-19 (Club for Growth). Likewise, the proposed display of total refund requests and total dollar amounts requested (both from specific committees and from all committees) on PoliticalRefund's website would not include any identifiable contributor information.

Finally, the Commission concluded that PoliticalRefund could sell advertising and sponsorship opportunities to defray its costs. Because PoliticalRefund's activities are consistent with the Act and it is not subject to the Act's financing restrictions, its sources of income are not governed by the Act.

*Date Issued: November 21, 2013; Length: 9 pages.*

*(Posted 11/26/2013; By Travis Drake)*

**Resources:**

- [Advisory Opinion 2013-16](#) [PDF]
- [Commission consideration of Advisory Opinion 2013-13](#) 
- Brochure: [Sale and Use of Campaign Information](#)

## **Alternative Disposition of Advisory Opinion Request 2013-15 (Conservative Action Fund)**

On November 21, 2013, the Commission considered an advisory opinion request from the Conservative Action Fund (CAF). In its request, CAF asked a number of questions relating to the receipt and disbursement of Bitcoins, including whether CAF could accept Bitcoins as contributions from individuals and others lawfully permitted to contribute in connection with federal elections, and whether CAF could contribute, sell or directly spend the Bitcoins they receive. The Commission was unable to approve a response by the required four affirmative votes and concluded its consideration of the request without issuing an opinion.

*(Posted 11/25/2013; By Myles Martin)*

**Resources:**

- [Commission Consideration of Advisory Opinion Request 2013-15](#) 
- [Advisory Opinion Request 2013-15](#) [PDF]

## **Alternative Disposition of Advisory Opinion Request 2013-17 (Tea Party Leadership Fund)**

On November 21, 2013, the Commission considered an advisory opinion request from the Tea Party Leadership Fund (TPLF). In its request, TPLF asked the Commission to grant it exemptions from certain reporting and disclosure provisions of the Federal Election Campaign Act (the Act), including the Act's requirements to disclose the name and addresses of certain persons who have contributed to TPLF and the requirements to disclose those persons to whom expenditures or other disbursements have been made by TPLF. The Commission considered two draft advisory opinions, but was unable to approve an opinion by the required four affirmative votes and concluded its consideration of the request without issuing an advisory opinion.

*(Posted 11/25/2013; By: Myles Martin)*

### **Resources:**

- [Commission Consideration of Advisory Opinion Request 2013-17](#) 
- [Advisory Opinion Request 2013-17](#) [PDF]

## **Reporting**

### **Florida Special Election Reporting: 13th District**



**FLORIDA  
SPECIAL**

Florida will hold Special Primary and General elections to fill the 13th Congressional District House seat of the late Congressman Bill Young. The Special Primary will be held on January 14, 2014, and the Special General will be held on March 11, 2014.

Candidate committees involved in these elections must follow the reporting schedule posted at [http://www.fec.gov/pages/report\\_notices/2014/fl13.shtml](http://www.fec.gov/pages/report_notices/2014/fl13.shtml). That schedule also applies to PACs and party committees that participate in the elections and file on a semi-annual basis in 2013 and a quarterly basis in 2014. PACs and party committees that file monthly should continue to file according to their regular filing schedule.

### **Filing Electronically**

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the applicable filing deadline. Electronic filers who instead file on paper or submit an electronic report that does not pass the Commission's validation program by the filing deadline will be considered nonfilers and may be subject to enforcement actions, including administrative fines.

## **Timely Filing for Paper Filers**

*Registered and Certified Mail.* Reports sent by registered or certified mail must be post-marked on or before the mailing deadline to be considered timely filed. A committee sending its reports by certified mail should keep its certified mailing receipt with the U.S. Postal Service (USPS) postmark as proof of filing because the USPS does not keep complete records of items sent by certified mail. A committee sending its report by registered mail should keep its proof of mailing. Note that a certificate of mailing from the USPS is not sufficient to prove that a report is timely filed using registered, certified or overnight mail. 2 U.S.C. §434(a)(5) and 11 CFR 100.19 and 104.5(e) and (i).

*Overnight Mail.* Reports filed via overnight mail [[fn1](#)] will be considered timely filed if the report is received by the delivery service on or before the mailing deadline. A committee sending its reports by Express or Priority Mail, or by an overnight delivery service, should keep its proof of mailing or other means of transmittal of its reports. 2 U.S.C. §434(a)(5) and 11 CFR 100.19 and 104.5(e).

*Other Means of Filing.* Reports sent by other means—including first class mail and courier—must be received by the FEC before the Commission’s close of business on the last business day before the filing deadline. 11 CFR 100.19 and 104.5(e).

Forms are available for downloading and printing at the FEC’s website (<http://www.fec.gov/info/forms.shtml>) and from FEC Faxline, the agency’s automated fax system (202/501-3413).

## **48-Hour Contribution Notices**

A participating candidate’s principal campaign committee must file a 48-hour notice each time it receives a contribution of \$1,000 or more between December 26, 2013 and January 11, 2014 for the Special Primary and between February 20 and March 8, 2014 for the Special General.

## **24- and 48-Hour Reports of Independent Expenditures**

Political committees and other persons must file 24-hour reports of independent expenditures that aggregate \$1,000 between December 26, 2013 and January 12, 2014 for the Special Primary and between February 20 and March 9, 2014 for the Special General. This requirement is in addition to that of filing 48-hour reports of independent expenditures that aggregate \$10,000 or more during the calendar year up to and including the 20th day before an election. The 48-hour reporting requirement applies to independent expenditures that aggregate at or above \$10,000 prior to December 26, 2013 for the Special Primary. For the Special General, the 48-hour reporting requirement applies to independent expenditures that aggregate at or above \$10,000 prior to February 20, 2014.

## **Electioneering Communications**

The 30-day electioneering communications period in connection with the Special Primary runs from December 15, 2013 through January 14, 2014. The 60-day electioneering communications period in connection with the Special General runs from January 10 through March 11, 2014.

<sup>1</sup> "Overnight mail" includes Priority or Express Mail having a delivery confirmation, or an overnight service with which the report is scheduled for next business day delivery and is recorded in the service's on-line tracking system.

## **Disclosure of Lobbyist Bundling Activity**

Campaign committees, party committees and leadership PACs that are otherwise required to file reports in connection with the special election must simultaneously file FEC Form 3L if they receive two or more bundled contributions from any lobbyist/registrant or lobbyist/registrant PAC that aggregate in excess of the lobbyist bundling disclosure threshold during the special election reporting period. 11 CFR 104.22(a)(5)(v) and (b).

The lobbyist bundling disclosure threshold for calendar year 2013 is \$17,100. This threshold amount may increase in 2014 based upon the annual cost of living adjustment (COLA). As soon as the adjusted threshold amount is available, the Commission will publish it in the *Federal Register* and post it on its website. For more information on these requirements, see the [March 2009 Record](#). See 11 CFR 110.17(e)(2).

(Posted 11/14/13; By: Katherine Carothers)

## **Resources:**

- [Florida 13th District Special Election Prior Notice](#)
- [2013 Reporting Dates](#)
- [Florida 13th District Special Election Compliance Page](#)
- [Federal Register Notice](#)

## **Outreach**

### **New Party Committee Campaign Guide Available Now in Print**



A new edition of the *Campaign Guide for Political Party Committees* is now available both in hard copy and on the FEC website at <http://www.fec.gov/info/publications.shtml#guides>.

The Campaign Guide explains, in plain language, the complex regulations governing the financing of campaigns for federal office and serves as a compliance manual for national, state and local party committees.

Among other things, the *Campaign Guide* shows readers how to fill out FEC reports and illustrates how the law applies to practical situations.

To order a printed copy of the *Campaign Guide*, send an email to [info@fec.gov](mailto:info@fec.gov) or call (800) 424-9530 (press 6).

(Posted 11/19/13; By Dorothy Yeager)

## **Resources:**

- [Campaign Guide for Political Party Committees \[PDF\]](#)
- [Resources for Committee Treasurers](#)