

Advisory Opinion 1975-40

Reporting Requirements for  
Inter-Political Committee Contributions

This advisory opinion is rendered under 2 U.S.C. §437f in response to a request, published on September 3, 1975, at 40 FR 40676 (1975), which concerns the reporting requirements of a political committee which receives contributions from another committee. The question specifically raised is whether the reporting exemption under 2 U.S.C. §434(b)(2) for contributions to a political committee of \$100 or less, including contributions for the purchase of tickets for dinners, luncheons, etc., also applies to the situation where such contribution to a political committee is made by another political committee.

Each treasurer of a political committee supporting a candidate or candidates for election to Federal office is required to file reports of receipts and expenditures. 2 U.S.C. §434(a)(1). The report must contain the full name and address of each person who has made one or more contributions to or for such committee (including the purchase of tickets for events such as dinners, luncheons, rallies, and similar fund raising events) within the calendar year in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions. 2 U.S.C. §434(b)(2). It would initially appear that since the word "person" referred to in 2 U.S.C. §434(b)(2) is broadly defined in 2 U.S.C. §431(h) to include "any . . . committee", then any contribution or transfer of funds from one committee to another which aggregates \$100 or less need not be reported under 2 U.S.C. §434(b)(2). However, 2 U.S.C. §434(b)(4), further requires the report to contain "the name and address of each political committee . . . from which the reporting committee . . . received, or to which that committee . . . made, any transfer of funds, together with the amounts and dates of all transfers." (Emphasis added)

Thus, if a political committee purchases reception tickets or anything else from another political committee or the candidate's principal campaign committee, such purchase, regardless of the amount, constitutes a transfer of funds under 2 U.S.C. §434(b)(4) and is, accordingly, reportable. Both the recipient/transferee committee and the donor/transferor committee must report the name and address of each other together with the amounts and dates of all transfers.

This advisory opinion is issued on an interim basis only pending the promulgation by the Commission of rules and regulations of general applicability.