

ADVISORY OPINION 1975-93

Date When Honorarium Received

This advisory opinion is issued pursuant to 2 U.S.C. SS 437f. The request was published on November 4, 1975 in the Federal Register, 40 FR 51357. Interested persons were invited to submit written comments. No comments were received.

This request was submitted by Congresswoman Bella S. Abzug. She states that in 1974 she contracted to speak at Chatham College for an honorarium of \$2,000; that she fulfilled this engagement in November 1974 but was not paid until 1975. She asks two questions. First, whether she may accept the full \$2,000 without violating 18 U.S.C. §616. Second, whether the honorarium will count against the \$15,000 aggregate limit in 1975 and, if so, what amount will be charged against that limit.

The Commission answers the first question in the affirmative and the second in the negative. Ms. Abzug's engagement in 1974 was made prior to the effective date of the Federal Election Campaign Act Amendments of 1974 and had she been paid in 1974 it would not have come within the restrictions of §616. Therefore, the Commission will not consider Ms. Abzug's receipt of her agreed honorarium in 1975 as applicable to the \$1,000 or \$15,000 limits under 18 U.S.C. §616.

This advisory opinion is rendered on an interim basis pending promulgation of final rules and regulations or policy statements of general applicability.

Date: December 5, 1975

(signed) \_\_\_\_\_  
Vernon W. Thomson, Commissioner  
Federal Election Commission