



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

September 21, 1976

Re: AOR 1976-78

Mr. Stanley Schlesinger  
Treasurer  
New Yorkers for Koch  
425 Park Avenue  
New York, New York 10022

Dear Mr. Schlesinger:

This is in response to your letter dated August 27, 1976, in which you ask the Commission's opinion as to the effect of a disbursement by New Yorkers for Koch, a registered political committee which has been designated by Congressman Koch as his principal campaign committee, for a campaign button which reads "Carter-Mondale-Koch."

Your letter states that this button was printed "without prior consultation" with the "Carter campaign." Specifically, you ask whether the disbursement for the buttons would be considered as only an "expenditure" of the Koch campaign and not a "contribution" to the Carter/Mondale campaign.

The Commission is of the opinion that New/Yorkers for Koch may, under the circumstances set forth above and limited to the facts described in your letter, purchase and distribute the buttons, without the cost counting as a contribution in-kind to the Carter/Mondale campaign.

This response relates to your opinion request but may be regarded as informational only.

Sincerely yours,

(signed)  
Vernon W. Thomson  
Chairman for the  
Federal Election Commission