

WAL PAC

WITHDRAWN

Re: ACR 1977-36 *URN*

August 5, 1977

AUG 11 AM 8:10

Federal Elections Commission
1325 K Street, N.W.
Washington, D. C. 20463

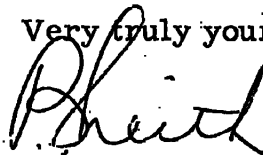
Re: WALPAC - Advisory Opinion Request
of July 20, 1977.

Dear Sir:

This is in reference to my letter to you of July 20, 1977.

In view of the telephone conversation between Mr. Scott Thomas of the Federal Election Commission and Ms. Mary L. Sullivan on August 4, 1977 wherein she was advised by Mr. Thomas of information rendering the subject matter of WALPAC's advisory opinion request moot, we are no longer in need of a formal advisory opinion from the Commission. Please disregard my letter to you of July 20, 1977.

Very truly yours,



R. G. Leith
Secretary-Treasurer
WALPAC



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 9, 1977

Re: AOR 1977-36

R. G. Leith
Secretary-Treasurer
Western Airlines Political .
Action Committee
6060 Avion Drive
Los Angeles, California 90009

Dear Mr. Leith:

As a result of a telephone conversation on August 4, 1977, between Mary L. Sullivan and a member of our legal staff, I understand that your committee may no longer require an advisory opinion concerning preemption of the California campaign disclosure statute.

In another telephone conversation on August 4, our office also learned from Mr. Robert Stern, General Counsel of the California Fair Political Practices Commission (FPPC), that Cal. Govt. Code §84208 is not enforced with respect to Federal candidates and political committees which support only Federal candidates. The FPPC policy was adopted in response to Opinion of Counsel 1975-97 (copy enclosed) which was issued to the FPPC by the former General Counsel of the Federal Election Commission on March 19, 1976. The substance of that opinion of counsel is that Federal candidates and political committees need file copies of reports in State offices only as provided by 2 U.S.C. §439 and that Cal. Govt. Code §84208 is preempted to that extent.

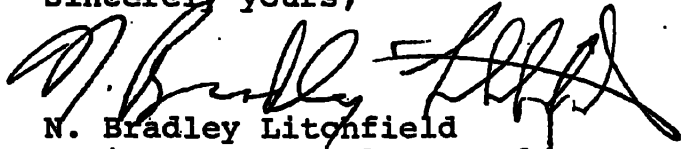
Mr. Stern indicated that you could contact him to verify the foregoing. His address is: Robert Stern, General Counsel, California Fair Political Practices Commission, 1100 K Street, Sacramento, California 95814.



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In view of these developments and our telephone conversation with Ms. Sullivan, I understand that an advisory opinion pursuant to 2 U.S.C. §437f is no longer needed by WALPAC. If this is the case, I would appreciate your sending me a letter withdrawing your advisory opinion request. Thank you for your cooperation.

Sincerely yours,



N. Bradley Litonfield
Assistant General Counsel

Enclosure