



FEDERAL ELECTION COMMISSION
Washington, DC 20463

CONCURRING OPINION IN ADVISORY OPINION 1984-18

of

COMMISSIONER FRANK P. REICHE

I concur in the conclusion of the Commission that the proposed political contribution plan of Hamel & Park, a law partnership, would not be required to register and report as a political committee under the Federal Election Campaign Act or Commission regulations. My agreement with this conclusion is based in part upon assurances that the expenses incurred by the partnership in facilitating the making of political contributions will be negligible and will not in any event exceed \$1,000 in a calendar year.

My agreement is also based upon the apparent voluntary nature of the contributions. While I have previously questioned, in other Advisory Opinions regarding partnerships, whether the potential political contributions would be truly voluntary, the Requestor herein provided adequate assurance on this point.

This Advisory Opinion nevertheless runs afoul of the same deficiency which has appeared in other Advisory Opinions regarding political contributions made by checks drawn on partnership accounts since the Opinion would attribute these contributions not only to the individual partners making them, but also to the partnership itself. As I have noted in various concurring and dissenting opinions, this duplicate attribution of contributions is an absurd conclusion and totally ignores the facts surrounding the making of such contributions.