

Bill Orton
U S House of Representatives
Washington, D C 20515
FEB 21 PM 4: 33
FEDERAL ELECTION COMMISSION

February 21, 1992

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D C. 20463

Dear Mr. Noble:

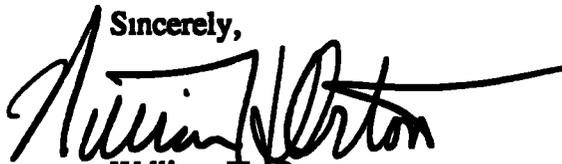
I hereby request formal clarification of the Federal Election Commission rules on a proposed campaign fundraising method. Before being elected to Congress, I spent a portion of my time teaching seminars for attorneys and CPAs throughout the United States. These seminars provided training in various provisions of the tax code and related regulations.

I propose providing educational seminars on various tax and banking laws as a fundraising mechanism for my re-election campaign. All proceeds from the seminars would be considered campaign contributions and would be handled accordingly, including all of the notices and limitations which apply to campaign contributions. The total cost of putting on the seminars, including my travel, advertising expenses, etc., would be treated by the campaign as a fundraising expense.

I believe that this is similar to the more traditional method of raising campaign funds where individuals pay a specified amount to attend a dinner or reception for a candidate who may deliver a speech or make brief remarks. The difference is that my remarks would be more substantive and may actually be deemed to have some value to the attendee. Since I am not aware of anyone else who is using this technique to raise campaign contributions, I would like to get a formal ruling from the FEC to ensure that there is not some aspect of this proposal or some provision of the election laws which I may have overlooked

I would appreciate getting your opinion as quickly as possible. Of course, if you need any additional information on what I propose, I will be happy to respond immediately.

Sincerely,



William H. Orton
Member of Congress

Bill Orton
U.S. House of Representatives
Washington, D.C. 20515

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February 27, 1992

Brad Litchfield
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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RECEIVED
FEDERAL ELECTION COMMISSION

Dear Mr. Litchfield:

AOR 1992-08

This is in response to your most recent questions concerning the use of tax seminars for the purpose of raising campaign contributions for my re-election to the U.S. Congress.

We will publicize and advertise these seminars by using lists purchased from specific list brokers. The mailings will be a brochure which will include very clearly a statement that the fee for this seminar will be a campaign contribution to my re-election committee. The RSVP portion of the brochure will contain this disclaimer as well. It is our intention, and my past experience, that 50,000 to 75,000 brochures will be needed to produce a successful event. A certificate of continuing education will be offered each participant at the conclusion of the seminar.

At this point, I would like to target the months of June, July and September to host these seminars. The cities I would envision at this time would be Washington, D.C., New York, Chicago, and perhaps Los Angeles and/or San Francisco.

I hope this provides you with the additional information you need to issue a formal FEC opinion in writing. If you need more information, please do not hesitate to call me or Kristal. Your prompt attention to this matter is greatly appreciated.

Sincerely,

William H. Orton
Member of Congress