

**WELCH**  
**U.S. SENATE**  
COMMON SENSE. PERIOD.

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F.E.C.  
SECRETARIAT

93 DEC 22 PM 5:09

December 20, 1993

Lawrence M. Noble  
Office of General Counsel  
Federal Elections Commission  
999 E Street, N.W.  
Washington, D.C. 20463

ADR 1993-25

RECEIVED  
FEDERAL ELECTIONS COMMISSION  
93 DEC 21 PM 5:03

Dear Mr. Noble:

I write to request an advisory opinion concerning a State of Wisconsin statute and its effect on my federal campaign committee. In brief, I am a state legislator who is seeking the office of U.S. Senator. I have a federal campaign committee, Citizens for Welch, formed to solicit and accept contributions for my U.S. Senate campaign.

The following is a state statute dealing with donations of PAC contributions and donations from lobbying principals to a state legislator:

**13.625 Prohibited practices. (1) No lobbyist may:**

**(c) Except as permitted in this subsection, make a campaign contribution, as defined in s. 11.01 (6), to a partisan elective state official for the purpose of promoting the official's election to any national, state or local office, or to a candidate for a partisan elective state office to be filled at the general election or a special election, or the official's or candidate's personal campaign committee. A campaign contribution to a partisan elective state official or candidate for partisan elective state office or his or her personal campaign committee may be made in the year of a candidate's election between June 1 and the day of the general election. . .**

I have read FEC AO 1978-66 and FEC AO 1989-12 which deal with similar subjects. I believe that federal law preempts this state statute, but I am seeking your official opinion.

As you are aware, the next FEC cut-off date is December 31, 1993. I have several contributions that would be affected by your opinion. I would respectfully request that you expedite an

CITIZENS FOR WELCH

P.O. Box 472

MADISON, WI 53701

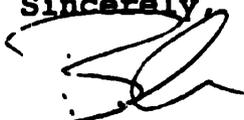
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Mr. Noble

opinion, so that I may properly account for those contributions on my end of year FEC report.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Welch", written over a horizontal line.

ROBERT T. WELCH  
State Representative  
41st Assembly District