

March 8, 1995

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Office of the General Counsel FEDERAL ELECTION COMMISSION 999 E Street NW Washington, DC 20463

RE: Request for Advisory Opinion

AOR 1995-09

#### **Dear Commission Members:**

This is a request for an advisory opinion by the Federal Election Commission for the use of the Internet and related technology to solicit and accept voluntary contributions to NewtWatch, a nonconnected political committee. From my understanding of applicable regulations and statutes, there are four principal issues for consideration by the Commission in this request:

- Whether the Internet constitutes "general public communication" to solicit voluntary contributions as defined by 11 C.F.R. 100.7(b)(15)(i) and 11 C.F.R. 100.7(b)(17)(i) and as "general public political advertising" as defined by 11 C.F.R. 110.11(a)(1).
- Whether the Internet and its related technology can be used to accept voluntary contributions using credit cards, electronic funds transfers and potentially other electronic means consistent with previous Advisory Opinions by the Commission, including A.O. 1990-4; A.O. 1978-68; A.O. 1989-26 and A.O. 1984-45.
- Whether the Internet and its related technology can adequately insure "best efforts" as defined by 11 C.F.R. 104.7 to "obtain, maintain and submit" contribution data.
- Whether the Internet given its unique global nature as a means of general public communication can adequately restrict contributions prohibited by Federal law and cited by Code, to wit: 11 C.F.R. 110.4(a) "contributions or expenditures by foreign nationals;" 11 C.F.R. 110.4(b) "contributions in the name

of another;" 11 C.F.R. 114.2 "contributions, labor organizations, and national banks;" and 11 C.F.R. 115.2(a) "contributions from federal contractors."

NewtWatch exists principally as a "virtual PAC" on the World Wide Web and is intended for the burgeoning number of Americans who recognize the Internet and Web as increasingly accessible and quintessentially democratic tools to access information about — and participate in — American politics. It's mission is to raise public awareness and provide a forum for publicly available information on selected public officials, most notably Speaker of the House Newt Gingrich.

#### 1) Soliciting Voluntary Contributions Via the Internet

First, at issue for the Committee in this request is whether the Internet and World Wide Web constitute public political advertising in a "general public communication" as defined by 11 C.F.R. 100.7(b)(15)(i); 11 C.F.R. 100.7(b)(17)(i) and 11 C.F.R. 110.11(a)(1) and whether solicitation of contributions by such means is lawful.

It would seem obvious to those familiar with it that the Internet is manifestly a means of "general public communication." Despite its functional dissimilarities to media explicitly referenced in the regulations (broadcast, newspapers, direct mail), the Internet is no less public a venue in essence than cable television, which requires similar entry costs for equipment and connection.

Beyond that, NewtWatch pays and will continue to pay the normal and customary value for maintaining the NewtWatch web page on a commercial server. This will be reported by the committee as an operating expenditure pursuant to 11 C.F.R. 104.3(b)(1)(i) and (3)(i).

#### 2) Accepting Voluntary Contributions Via the Internet

Second, at issue for the Committee in this request is whether the Internet can be used not simply to solicit but accept contributions.

With the Internet and World Wide Web rapidly expanding to accommodate on-line commerce, the transmission of encrypted credit card numbers and related data for the purchase of information and software is already well on its way to commonplace. Apart from commerce, non-profit foundations are already using purchasing arrangements such as that offered by First Virtual Holdings Corporation to enable Web browsers to make voluntary contributions on-line.

NewtWatch has endeavored to accept contributions through First Virtual Holdings Corporation (see Attachment 1). First Virtual is a financial services company specifically created to enable on-line commerce via the Internet. To make voluntary contributions through the Internet, users must first have registered their credit card numbers with First Virtual. Using an ID issued by First Virtual, a user is enabled make purchases and contributions at various sites throughout the Internet. Before any transaction is actually processed, the purchaser is sent an electronic message by First Virtual via e-mail requesting approval or disapproval of the transaction. An affirmative electronic reply by the user then constitutes acceptance, and the transaction is processed through the user's credit card.

For purposes of this request, contributions through First Virtual are essentially credit card transactions which have been previously recognized by the Commission as lawful under the Act and regulations according to Advisory Opinions 1990-4; 1978-68; 1989-26 and 1984-45. The steps added by First Virtual are merely for the security of the purchaser, to enable on-line commerce without the transmission of credit card numbers over lines which are generally unsecured.

First Virtual charges a 2% commission on all transactions. NewtWatch will pay First Virtual this normal and customary commission, reporting it as an operating expenditure pursuant to 11 C.F.R. 104.3(b)(1)(i) and (3)(i).

# 3) Ensuring "best efforts" to "obtain, maintain and submit" contribution data

Third, at issue for the Committee in this request is the extent to which the on-line contribution mechanism can realistically meet "best efforts" to comply with Federal law as cited by 11 C.F.R. 104.7 to "obtain, maintain and submit" contribution data.

The contribution mechanism of NewtWatch requires on-line contributors to complete an electronic form not unlike a printed contribution remittance (see Attachment 2). The information requested includes the donor's name, address and employer as well as contribution amount and is retained by the PAC electronically to fulfill the recordkeeping requirements set forth in 11 C.F.R. 102.9 (a) through (f). To ensure that multiple contributions aggregating over time to exceed \$200 in a calendar year are reported properly, all donors — irrespective of the amount of each contribution — are required to complete the electronic form to enable the transaction through First Virtual.

Our electronic "best efforts" actually exceed those of printed remittances in that the mechanism is structured to automatically reject efforts to contribute if a required field is left blank (including "occupation/employer"). Should a contribution be attempted without completing the form, the contributor would get an immediate response on-line reading, for example: "In order to process your donation please enter your employer/occupation in the space provided." Returning to the electronic form, the contributor will find it has retained the previously-entered information so that the form can be completed properly and re-submitted.

#### 4) Ensuring Refusal of Contributions Prohibited by Federal law

Fourth, at issue for the Committee in this request is whether the fundraising mechanism can adequately ensure that contributions received over the Internet are not prohibited by Federal law as cited by 11 C.F.R. 110.4(a) "contributions or expenditures by foreign nationals;" 11 C.F.R. 110.4(b) "contributions in the name of another;" 11 C.F.R. 114.2 "contributions, labor organizations, and national banks;" and 11 C.F.R. 115.2(a) "contributions from federal contractors."

Given the global nature of the Internet, this concern is properly differentiated from other means of solicitation through "general public communications," and is perhaps most unique to all the issues raised by political solicitation via the Internet.

Again, our electronic "best efforts" exceed those of printed remittances in that the mechanism is structured to reject all efforts to contribute unless donors specifically attest that the contribution is made lawfully. You will note from Attachment 2 that a set of four "gateway" questions is posed to each contributor prior to the remittance form. These are:

- 1) Do you attest you are making this contribution from your own funds and **not** those of another? (11 C.F.R. 110.4[b])
- 2) Do you attest that this contribution is **not** from the general treasury funds of a corporation, labor organization or national bank? (11 C.F.R. 114.2)
- 3) Do you attest that you are **not** a Federal government contractor? (11 C.F.R. 115.2[a])
- 4) Do you attest that you are **not** a foreign national who lacks permanent resident status in the United States? (11 C.F.R. 110.4)

Should any of these questions be answered "no" or left blank on the submitted electronic form, the contributor would get an immediate response on-line reading, for example: "Sorry, Federal law prevents us from accepting contributions from a foreign national who lacks permanent resident status in the United States" (Attachment 3). The contributor is additionally instructed "If you think you may have filled out the contribution form incorrectly you should try again." Returning to the electronic form, the contributor will find it has retained the previously-entered information so that the form can be completed properly and re-submitted, if appropriate.

#### 5. Other Concerns

You will also note from Attachment 2 that the disclaimer "Paid for by NewtWatch, a nonconnected federal political action committee, Federal Election Commission ID number C00301184" appears on the bottom of the page pursuant to C.F.R. 110.11(a). Should you review the NewtWatch web site itself, you will further note that the

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disclaimer appears on all pages bearing either a direct or indirect solicitation for contributions.

Above the electronic contribution form, we have also stated that "Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. You should also know that contributions to NewtWatch are not tax-deductible for Federal Income Tax purposes."

As treasurer of NewtWatch, it is my intention to comply fully with the Act and regulations. Should the Commission find other concerns in its Advisory Opinion not discussed herein, please don't hesitate to address them also. You may contact me at the number above or via e-mail.

I would recommend also that you examine the NewtWatch web site itself using a form-capable browser to check compliance with all applicable Federal statutes and regulations relating to campaign finance. It is accessible via World Wide Web using the following Uniform Resource Locator (U.R.L.):

http://www.cais.com/newtwatch/

Thank you for your consideration in this request.

Treasurer

Sincerely,

## ATTACHMENT 1

# First Virtual's Internet Payment System

Internet. The system is simple to use and requires no special software beyond the normal electronic mail program you already use.

## **Our Vision**

started with a simple vision: making it easy for everyone to buy and sell information over the Internet.

Many different companies are talking about setting up mechanisms for Internet commerce, and most of these use complicated software, require complex encryption methods, and connect to a multitude of different banks, servers, currency exchanges, and so on.

At First Virtual, we realized that if Internet commerce wasn't simple enough for ordinary people to use, without any special software or training, most people wouldn't bother.

We felt that encryption was still too complex, difficult to use, and unreliable to be the right answer for everyone. We knew that having everyone use the same proprietary software was not the right answer either.

We wanted a mechanism that was simple and safe to use, available to everyone on the Internet, and consistent with the general Internet philosophy of freedom of information.

We couldn't find one -- so we built one. That's the vision that led to First Virtual.

# **Insights about Internet Commerce**

When we set out to build a mechanism for information commerce over the Internet, we quickly realized three things.

First, we realized that the costs to the seller associated with selling information over the Internet are much lower than the cost of doing business the traditional way. Duplication costs for information products are virtually zero. The cost of warehousing is trivial. The cost of distribution — once the seller has paid the ordinary cost of an Internet connection — is effectively zero. And returned goods? It costs more to receive returned goods than if the unsatisfied customer just throws it away!

The seller has lost little or nothing by letting a potential buyer examine the information before deciding whether to buy it, even if the buyer decides not to buy. Virtually all of the expense to the seller is due to the cost of developing the information in the first place, and that cost is the same whether you sell ten copies, a thousand copies, or no copies at all.

Second, we realized that for buyers, it's often difficult to know whether an information product is worth purchasing unless the prospective buyer is able to examine or use it. For instance, if someone is selling instructions on installing a computer program properly, a buyer can't know whether those instructions are worth paying for without having a chance to try them out and see if they work. This makes people reluctant to pay in advance over the Internet for information whose usefulness is unknown.

And third, we realized that hardly anyone would use the Internet to buy or sell information unless it was simple to do

so. Even the most basic encryption methods make Internet commerce so complicated that most people won't bother. And it would be a tragedy for the Internet -- which has been built out of the small individual contributions of millions of people -- if a few big companies, with the patience and resources to make encryption work for them, came to dominate the Internet and crowd out those individual contributions that have made it such a fascinating place.

## First Virtual's Response

By putting these insights together, the founders of First Virtual invented a scheme that's so simple that everyone can understand and use it, yet robust enough that it can be used for almost any kind of information purchase. It's a system that lets most buyers try before they buy, and lets sellers set their own prices according to the return they require on their development costs.

We avoid the problems of encryption entirely, because under our system, there's never any need to send sensitive information over the Internet at all -- and since there's no confidential information being sent, there's nothing that needs to be kept secret.

Our system allows you to try before you buy. Under the First Virtual scheme, if a buyer comes across something that looks interesting, he or she simply asks for a copy of the information, providing his or her First Virtual account identifier to the seller. The seller then forwards information about the transaction, including the buyer's First Virtual account identifier, to First Virtual's Internet Payment System server.

First Virtual's server then sends electronic mail to the buyer asking if the information was satisfactory. If the buyer decides that the information is of value, he or she replies "yes," and payment for the item is automatically transferred from the buyer to the seller. If the buyer decides the information is not worth keeping, he or she replies "no," and is not obligated to pay.

From time to time, buyers' credit card accounts are billed for the charges that have accrued during the billing period, and sellers' checking accounts are credited with payment for items sold. First Virtual handles accounting for both buyers and sellers.

# It's that simple!

Efficient, Convenient, Useable, Understandable, Safe.

And best of all, it's here today!

# How to Buy Information with a First Virtual Account

Buying information is easy, safe, and convenient. Follow the step-by-step instructions below to apply for an account, then try buying some information to see how easy it is!

## **Before You Start**

Here are a few bits of information you'll want to know before you begin.

### Who Can Use First Virtual

There are only a few restrictions on who can sign up for a First Virtual account and use it to **buy** information. (If you also want to be able to use your account to **sell** information, additional details are available online.)

First, you need a personal electronic mail account with an address and password that are private to you alone. All our business is done via electronic mail, and we use your email address to ask you if you agree to pay for your purchases. Actually, you can share your address and password, but only with people who you would trust with your wallet, like your spouse.

In order to work with First Virtual, your electronic mail account needs to be on the Internet, or at least to be able to send and receive Internet messages.

Second, for now, you need a credit card. In 1995, we will begin to offer to debit your checking account directly, but right now that technology is not in place. We currently handle Visa, and MasterCard.

What makes First Virtual safe for you to use is the fact that your credit card number is never sent over the Internet, and indeed is never even stored on a machine that is connected to the Internet. It is protected with the same care and by the same mechanisms your bank uses to protect it.

Also, other than the one-time account setup fee of \$2.00, we will never post a charge on your credit card without first getting an explicit confirmation from you via email that you agree to the charge.

Third, for now, you must be able to use United States dollars to buy information. By 1995, anyone in the world will be able to buy and sell information using First Virtual, in their own currencies, but for now, you must use a credit card which is able to make charges in United States dollars.

## Your Name and Account Identifier

When you apply for your First Virtual account, you'll be asked for three important pieces of information.

First, you'll be asked for your "Full Name." This is the name that people will see who buy information from you, or sell information to you. It will be public information.

Second, you'll be asked for your electronic mail address. As explained above, First Virtual does business through your electronic mailbox, and this mailbox should belong to you and only you.

Third, you'll be asked for your "ID-Choice" -- the string that we base your First Virtual account identifier on. Your account identifier is the string that will identify you to sellers and to First Virtual when you buy information.

• First Virtual, unlike many other Internet services, allows you to choose most of your own account identifier. Anything easy to remember will do, but be careful. You will be giving this account identifier out over the Internet as part of every First Virtual transaction, so you shouldn't use any secret or sensitive information (such as your email password, your date of birth, etc.) that you wouldn't want to be giving out to random strangers. And since you want to keep it relatively confidential, you shouldn't use anything that's ridiculously easy for people who don't know you to guess (like your name or your email address).

For your own protection, we'll change your ID-Choice a little bit in generating your actual account identifier, to make it a little more difficult to guess and to insure that no two people have the same Account ID. When the application process is complete, a confirmation will be returned via email with your actual account identifier. Your account identifier will match the ID-Choice you specified, except that it will have a short random word added to the front to assure its uniqueness and to make sure it's difficult to guess.

Your account identifier is safe to send over the Internet because it is linked to your credit card number only deep within First Virtual's system, on a machine that is never connected to the Internet and is managed by our financial transaction partner. It also reveals nothing about you.

Based on your account identifier, no seller (or other person) can discover your postal address, phone number, or even your email address (although a seller may be aware of your email address if you connected to his or her information server). Sellers are told your Full Name, but only for convenience and security, so that we can refer to you without sending your account identifier over the Internet more often than necessary.

And if your account identifier were ever stolen, you would still be protected, because before we ever make any charge to your credit card, we ask via email for your explicit permission to do so. If you don't recognize the item that we are asking to charge you for, all you have to do is tell us, and we'll invalidate your account identifier and let you apply for a new one. So the worst that anyone can do who knows your account identifier is to make you go through the annoyance of having to change it. Since this *can* be annoying, choose something that a casual guess will not reveal.

# How to Apply for Your First Virtual Account

## **Step One: Send Us Your Personal Information**

First, you need to give us your name, email address, and ID-Choice, so we can begin processing your application. There are a number of ways to do this:

You can send an email message to apply@card.com, and our email server will send you a simple application form automatically When you get the application form, simply save the message in a file, and follow the instructions provided in the message to fill in the blanks. Then send the edited message back to us at newacct@card.com. As soon as we get it, we'll start processing your application.

Or, if you prefer, you can use Telnet to connect to telnet.card.com to fill out the application interactively. (If you happen to be running X-Windows, you will be able to use a graphical interface to fill in the form, but neither X-Windows nor UNIX is required; any ordinary Telnet connection is fine.)

## **Step Two: Tell Us Your Financial Information**

For your own protection, we don't ask for your credit card number or other sensitive information over the Internet. Instead, once First Virtual has started processing your application, you will receive an email message from us telling you to call our computer on the phone and give us your credit card number using your Touch-Tone keypad. You can make this call anytime, day or night.

The email message will give you two things: a toll-free 800 telephone number to call (with a direct-dial number in case you are calling from outside the U.S. and Canada), and an "application number". This application number is just a randomly generated number that you use to tell us who is calling.

Have your application number and your credit card ready when you call. A computer will ask you for each number in turn. Once they are successfully enterred, you will receive another confirmation via email, as described below.

## **Step Three: Begin Using Your Account!**

In a few hours, once the confidential information is moved to the proper machines, you will receive one more email message from First Virtual. This will acknowledge that your account is ready to use. It will also reveal the random word we put at the front of your ID-Choice to form your account identifier. With this information in hand, you are all ready to go out on the Internet and buy information using First Virtual!

# How to Buy Information

Making an information purchase is easy. As usual on the Internet, finding the information you want can be harder than getting it once you've found it.

## **Finding Information**

First Virtual is not in the business of finding information for you. We leave that to others. However, we do have an FTP site, a WWW home page, and the Infohaus, all of which offer information for sale.

Watch this space for directions to the sources of information to buy that are made available by First Virtual; they will be added soon.

## **Examining Information**

Information for sale will always be presented with a description (provided by the seller) and a price (set by the seller). The seller's price is the price you pay; First Virtual never charges you any fee for a purchase transaction.

In keeping with the Internet's history of open information exchange, most sellers will allow you to download and review their information before requiring you to decide whether to keep and pay for it. (A few sellers may require you to agree to pay for information before they will let you download it, but that's against our rules.)

When you find a seller offering something that looks interesting, at a price that looks reasonable, tell the seller's information server that you'd like a copy. Usually, the seller's server (or the Infohaus) will ask you to enter your account identifier before allowing you to download information; this is done so that the transaction can be reported to First Virtual, and we can ask you whether you agree to pay for the information, as described below.

Here are the steps in some common kinds of First Virtual transactions:

#### **FTP**

Usually, when you log in to a First Virtual-compatible FTP server, you should use "fvftp" as your user name rather than "anonymous". Then give your First Virtual account identifier (rather than your email address) as your password.

You can generally browse directory listings -- which will tell you how much the files cost -- for free. (If there is ever

a charge for browsing, the server will notify you.) The prices of any files you decide to download will be billed to your First Virtual account, subject to your approval via email (see below).

#### World Wide Web Browsers

Sometimes when you attempt to follow a link (e.g., by clicking on a word), instead of the information you expect, you will see a screen telling you the price of the information and requesting your First Virtual account identifier. If you provide your account identifier, you will have access to the information, and your First Virtual account will be billed for its cost, subject to your approval via email (see below).

### Mailing List Subscriptions

Some Internet mailing lists may charge a subscription fee that is payable through your First Virtual account. If you ask to subscribe to such a list, you will receive a message telling you the subscription fee and asking for your First Virtual account identifier. If you provide your account identifier, you will be added to the list and your account will be billed for the subscription fee, subject to your approval via email (see below).

## **Confirming Your Purchases**

Shortly after a seller tells First Virtual that you bought information, we will forward a copy of the bill to your electronic mailbox for your inspection. The bill will include the seller's name and your name, the amount you are requested to pay, and a brief description of what you purchased. In addition, there may be a longer and more detailed description provided by the seller.

If you are using our electronic mail extension software, a convenient form explaining the details will appear, allowing you to reply automatically.

If you are using your regular email software, you should use the "reply" feature of your email software, taking care to preserve the transaction code number in the header, and including in your reply message just a single-word answer. This single word must be one of these three answers:

#### YES

By answering "yes", you indicate to us that you received the information, that you have examined it, that you have determined that the seller has provided value thereby, and that you authorize us to charge your credit card for the selling price.

When we receive this message, we will bill your account and transfer the money to the seller's account. Because many sales will be for small amounts of money (anywhere from a few pennies to a few dollars), we may not bill your credit card immediately. Instead, several confirmed information purchases may be accumulated and posted to your credit card account as a single charge. In either case, you will eventually get a statement from us allowing you to reconcile your purchases.

#### NO

By answering "no", you indicate to us that you recognize the item described on the bill, but that you do not wish to pay for it.

Perhaps the information you received was inaccurate, or did not apply to you, or wasn't what you expected. You didn't like the picture. The software was incompatible with your machine. You tripped over the power cord halfway through downloading it. You realize you already have a copy.

- For any reason or no reason, if you decide the information is not worth the price to you, just say no.
- (You should recognize that if you answer "no" too often, we may suspend your ability to use your First Virtual account identifier for future purchases. However, we take many factors into consideration, including the number of other buyers dissatisfied with this seller, and you should not have any problem unless you are intentionally abusing the system.)

#### **FRAUD**

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By answering "fraud", you indicate that you have received a bill for information that you do not recognize. First Virtual understands that it is virtually impossible to keep something secret that passes through the Internet, especially if someone is looking for it, and it is conceivable that someone could use your account identifier without your permission.

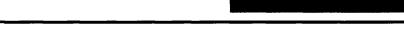
If you receive a bill from First Virtual relating to a sale or seller you do not recognize, simply respond with the word "fraud" and your account identifier will be invalidated for your own protection, preventing further abuse. We will be in touch with you about setting up a new account shortly after that.

## **Reconciling Your Account**

Whenever we post a charge to your credit card, we will again send you electronic mail detailing the list of information purchases that make up that charge. This message will include a short code number that will also appear on your credit card statement. You can use this message, along with your credit card statement, to understand exactly what each First Virtual charge to your credit card was for.

# It's that easy!

# You Can Help



## How You Can Help

If you like what you see and you'd like to help, NewtWatch welcomes your participation.

#### **Comment**

We believe that unleashing the creative energy of citizens is crucial not simply to the success of *NewtWatch*, but to the invigoration of democracy itself. That's why we welcome your input: whether it be suggestions, criticism or even submissions for publication. We want *NewtWatch* to remain a vibrant and participatory Web site that's more than just a resource, but a forum for ideas, information and humor.

#### **Contribute**

Your contribution will help *NewtWatch* expand the resources we make available to the Web community and help meet the costs of staying on-line, informative and current. Though we'll never be able to compete with GOPAC, we hope donations from people like you will sustain *NewtWatch* for the duration of the Newt's Congressional stewardship. And we've done out best to make it as easy as possible for you to contribute, using the latest available services and technology.

## About NewtWatch

NewtWatch is a nonconnected political action committee registered with the U.S. Federal Election Commission in Washington, D.C. (FEC ID number C00301184).

NewtWatch is not affiliated with any candidate, corporation or political entity. The sole interest of this PAC is to raise public awareness and provide a forum for publicly available information on selected public officials, most notably Speaker of the House Newt Gingrich.

Designed to be the Web's first "virtual PAC," NewtWatch exists only on the World Wide Web and is intended for the burgeoning number of Americans who recognize the Web as an increasingly accessible and quintessentially democratic means to access information about — and participate in — American politics.

NewtWatch has no plans or intentions to make contributions to other candidates for public office or to engage in independent expenditures other than that of the NewtWatch Web page itself.

## Comment

We welcome your participation, thoughts, comments and suggestions for improvement. If you have ideas for things

• you'd like to submit for publication here, we'd also love to hear about it. And if you want to launch a fiery, hateful tirade at'us, that's okay, too -- we're young, we'll bounce back. (In fact, we look forward to re-printing some of the more flaming comments in future updates of *NewtWatch*).

So go ahead, tell us what's on your mind:

Dear NewtWatch:

Sincerely,
Name
E-mail address

To submit your comments, select this button:

To clear your comments, select this button:

## Contribute to NewtWatch

If you like *NewtWatch* and want to see it continue for the duration of the Newt-led Republican interregnum on Capitol Hill, it's easy for you to contribute. We ask only that you complete a brief remittance form to help us comply with FEC regulations. To contribute, you can...

### ...Contribute on-line right now

You can use your secure First Virtual account to contribute right now.

#### ...Print out a remit form right now

You can use the "print" command of your Web browser (usually under the "File" menu) to print out a pre-addressed remittance form right now.

#### ...Request a contribution form via U.S. Mail

Or, you can simply tell us your address and we'll send a remittance form to you in the mail.

With your help, NewtWatch can expand its coverage to include added vote analysis, more contributor listings, staff and office expenditures, further ethics complaints, biographical data -- all sorts of information. Your contribution will also help us meet the expenses to stay on-line, conduct ground-breaking research, gain multi-media capabilities and get the word out about NewtWatch.

We want NewtWatch to be a resource worthy of the World Wide Web, providing you with the kind of information you've come to expect from on-line access. Where TV can tell you about Newt's ethics problems, NewtWatch will let you read the complaints verbatim. Where newspaper reports can tell you about Newt's contributors, NewtWatch will give you full access to the actual data. And where talk radio will skip the details entirely, NewtWatch will provide you with the facts -- full, comprehensive and accurate -- without insulting your intelligence by digesting them for you.

If you like what we're doing, we hope you'll help. As long as you use your own funds and are not a corporation, a foreign national or a federal government contractor, you can contribute up to \$5,000 to NewtWatch per calendar year

• (but hey, we're happy with your support of \$10, \$20 or even \$5).

## **Contributing On-Line**

You can contribute to NewtWatch right now, using your First Virtual account!

First Virtual has rapidly become the standard for secure on-line commerce on the Internet. If you don't yet have a First Virtual account, you can register and come back.

For NewtWatch to accept your contribution on-line, FEC regulations require us to ascertain some basic information about you. So we can accept your contribution on-line, we ask only that you complete the brief form below. (If you're not sure about your answers, you can write us a brief message in the comments form asking for more information. Or, you can call the FEC at 1-800-424-3980).

Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. You should also know that contributions to *NewtWatch* are not tax-deductible for Federal Income Tax purposes.

You **must** answer each of the four questions and complete the forms below to enable *NewtWatch* to accept your contribution on-line.

### Yes, I want to contribute to NewtWatchon-line! Here's my information:

#### (Required for the FEC)

Do you attest you are making this contribution from your own funds and **not** those of another? (11 CFR Part 110.4[b])

Yes, No

Do you attest that this contribution is **not** from the general treasury funds of a corporation, labor organization or national bank? (11 CFR Part 114.2)

Yes, No

Do you attest that you are **not** a Federal government contractor? (11 CFR Part 115) Yes, No

Do you attest that you are **not** a foreign national who lacks permanent resident status in the United States? (11 CFR Part 110.4)

Yes, No

My name

My street address (2 lines if needed)

My City

·
My Zip Code
My Occupation/Employer
(Required for First Virtual)
My First Virtual Account ID is
Here's my contribution to NewtWatch (not to exceed \$5,000 per calendar year) \$
<del></del>
Requesting a Contribution Form Via U.S. (Snail) Mail
To send your contribution via U.S. Mail, you need only enclose a completed remittance form with your contribution to help us comply with FEC regulations. We can send you the form in the regular U.S. Mail in a few days (probably so you can enclose it with your check or money order. Unfortunately, as a "virtual" PAC we don't have any printed literature to enclose (what you see here on-line is what you get, basically).
Yes, I want to contribute to NewtWatch! Please send a remittance form to me in the mail:
My name is
My street address is (2 lines if needed)
My City
My State
My Zip Code
My Employer

- My State



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Paid for by NewtWatch, a nonconnected federal political action committee.
Federal Election Commission ID number C00301184.

# ATTACHMENT 3 STILL UNDER CONSTRUCTION!

Sorry, Federal law prevents us from accepting contributions from a foreign national who lacks permanent resident status in the United States.

If you think you may have filled out the contribution form incorrectly you should try again.

## STILL UNDER CONSTRUCTION!

# Sorry, Federal law prevents us from accepting contributions from a Federal government contractor.

If you think you may have filled out the contribution form incorrectly you should try again.

# STILL UNDER CONSTRUCTION!

Sorry, Federal law prevents us from accepting contributions from general treasury funds of a corporation, labor organization or national bank.

If you think you may have filled out the contribution form incorrectly you should try again.

# **STILL UNDER CONSTRUCTION!**

Sorry, Federal law prevents us from accepting contributions from funds other than those of the donor.

If you think you may have filled out the contribution form incorrectly you should try again.