

WASHINGTON POLICY ASSOCIATES, INC.

1414 PRINCE STREET

SUITE 375

ALEXANDRIA, VIRGINIA 22314

(703) 519-1715

FAX: (703) 519-1716

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COMMISSION
OFFICE OF GENERAL
COUNSEL
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October 12, 1995

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington DC 20463

AOR 1995-38

To whom it may Concern:

I am writing for an advisory opinion on the possible establishment of the following non-connected committee.

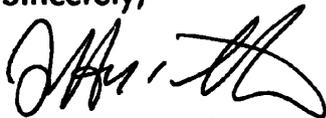
A number of private individuals including Jeffrey Smith wish to establish a non-connected committee to support candidates of both parties for office. The non-connected Committee may be called the "Entrepreneurs Fund." This non-connected committee wishes to solicit funds for candidates from the general public who support policies favorable to entrepreneurs.

These individuals wish to have the "Entrepreneurs Fund" hire WPA to provide management, fund raising and administrative support to the Entrepreneurs Fund, on a monthly retainer arrangement. WPA is an association management firm, providing management services to non-profit trade associations, professional societies, and other groups. These clients are completely separate from WPA, and retain WPA under written agreement. WPA is a corporation with three employees, including Jeffrey Smith, WPA's president. This arrangement with the Entrepreneurs Fund would be exactly the same as the one WPA has with its separate trade association clients, where WPA acts as manager, but none of WPA's employees are the Client's employees.

WPA would not provide any contributions or free services to the Entrepreneurs Fund. Jeffrey Smith would serve as the Entrepreneurs Fund's treasurer, in his capacity as a private individual.

I would appreciate your informing me if there is anything in this scenario which needs to be modified in order to be in full compliance with federal law. Thank you in advance for your consideration of this request.

Sincerely,



Jeffrey C. Smith
President

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