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OFFICE OF GENERAL
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MAY 23 11 49 AM '96

FAX TRANSMISSION

TO: FEC/Brad Litchfield
FAX: 202-219-3923 5-23-96

FROM: Daniel F. Walker
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RE: Reform Party/Ross Perot request for
FEC advisory opinion; public comment

COMMENTS (LATE)
AOK 1996-22

It has come to my attention that Ross Perot's Reform Party has sought an advisory opinion concerning whether the Reform Party and the party's presidential nominee other than Perot himself would be eligible for federal financing for their upcoming summer nominating convention and the fall campaign under Federal campaign finance laws.

I urge the FEC to reject the Perot/Reform Party request for a finding of eligibility for the funding sought.

(1) As a matter of law, the "Reform Party" did *not* come into legal existence until the fall of 1995. (2) The "Reform Party" is *not* one of the FEC-recognized national political party committees -- as are the Republican, Democrat, Libertarian, Natural Law, and U.S. Taxpayer parties. (3) While Perot was placed on the 1992 ballot under various minor party labels in (only) seven of the fifty states, *none* of those parties were operating as national parties and they were not affiliated in any way other than the fact that Ross Perot was their nominal "nominee." [In fact, the "Prudence, Action, Results Party" in Louisiana (which was Perot's vehicle in '92) ceases to exist due to the failure of that fleeting "party" to run candidates for party office in the March '96 primary.] (4) No Reform Party candidate has ever been listed as a candidate on *any* general election ballot to date.

While the Reform Party has published a page or two of "principles," it has *no* platform. Its *initial* platform allegedly will be adopted at the party's *initial* convention later this year. The "association, committee or organization" known as the Reform Party legally began in the fall of 1995, will acquire platform/policy substance in 1996, and there exists no legal and little substantive continuity between Ross Perot's *independent, self-financed* presidential campaign of 1992 and the presidential campaign of whoever is *nominated by convention* of the Reform Party in the summer of 1996.

Thank you for considering these comments.



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