



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1998-19

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Arthur L. Herold, et al.
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Dear Mr. Baran and Mr. Herold:

This refers to your letters dated September 4, and September 25, 1998, which request advice concerning the application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to various activities and circumstances presented by the Credit Union National Association, Inc. ("CUNA"), the Credit Union Legislative Action Committee ("CULAC"), the Texas Credit Union League ("Texas League"), the Pennsylvania Credit Union League ("Pennsylvania League"), the San Antonio Telephone Federal Credit Union ("San Antonio Credit Union") and the Patriot Federal Credit Union ("Patriot Credit Union"). The context of the request is a fundraising proposal developed by CUNA for the solicitation and collection of contributions to CULAC. The proposal is described in your request as the "Deduct-A-Buck" program which would be available to the non-corporate credit union members of the credit unions that are members of CUNA.

FACTUAL BACKGROUND

Structure of CUNA and State Leagues

CUNA is a trade association, incorporated in the State of Wisconsin as a non-profit, non-stock corporation with members.¹ You state that it has been recognized as an organization exempt from Federal income tax under section 501(c)(6) of the Internal Revenue Code. CUNA was organized, among other things, to promote and improve business conditions relating to the operation of its State league members and direct credit union members. You state that 51 of the members are leagues representing the 50 States and the District of Columbia. All the members of the State leagues are State chartered or Federally chartered credit unions. Each State league is incorporated and has been recognized as exempt from Federal income tax under section 501(c)(6) of the Internal Revenue Code. Some of the State leagues, such as Pennsylvania, have Federal PACs and others, such as Texas, do not have Federal PACs.² CULAC is the separate segregated fund established and administered by CUNA pursuant to 11 CFR 114.5(b).

You state that CUNA's bylaws have been recently amended to permit the individual credit unions to be members of CUNA. You also state that there are currently 11,265 credit unions in the United States, and that 10,200 of them are members of both CUNA and its State leagues. These credit unions have individual members that maintain share accounts in the credit union.³

Your request includes CUNA's articles of incorporation and bylaws, the Texas and Pennsylvania league bylaws and articles of incorporation which, you state, are similar to every other league's articles of incorporation and bylaws. Your request also includes copies of the articles of incorporation and bylaws for the San Antonio Credit Union and the Patriot Credit Union.⁴ You state that these credit unions are representative of CUNA's credit union members.

¹ As discussed below, CUNA also qualifies under Commission regulations as a membership organization, a membership association and a federation of trade associations.

² Information filed with the Commission by CULAC in 1984 identifies seven State league PACs as affiliated with CULAC, and Commission records indicate that they are currently active. One State league PAC, not identified by CULAC in its 1984 filing as affiliated, claims affiliated status with CULAC. Two other State league PACs, with which CULAC claimed affiliation in 1984, are no longer active according to documents filed with the Commission. Lastly, the reported affiliated status of two additional State league PACs is not readily apparent because of incomplete or ambiguous filings. This opinion does not address CULAC's possible affiliation with other PAC's maintained by its local credit union members. Such affiliation would be examined with reference to the affiliation factors at 11 CFR 100.5(g)(4). See 11 CFR 114.8(g).

³ You state that credit union members may include incorporated small businesses among their membership. However, the Deduct-A-Buck proposal in your request is not designed to solicit contributions from these corporate members. Thus, the Commission assumes that the program will not be made available to or used by them.

⁴ According to your request, the Patriot Credit Union was, until December 21, 1994, known by the name Letterkenny Federal Credit Union.

Membership rights within CUNA

A review of the bylaws of CUNA indicates that membership in CUNA for State leagues is through an application process. Individual credit unions that are members of the State leagues obtain automatic membership in CUNA. In the limited circumstances where a credit union is not within the geographic area covered by a member State league, that credit union may apply separately for CUNA membership.⁵ CUNA Bylaws, Article II, section 2.2, 2.3. The credit union members of the State leagues pay dues to CUNA which are collected and transmitted through the State leagues. CUNA Bylaws, Article VI, section 6.3.

The powers granted to CUNA's board of directors indicate that it has general management of the organization. CUNA Bylaws, Article III, section 3.9.⁶ This Board, with 24 voting members, is elected through a process ensuring that specific directors will represent the State leagues, or individual credit unions of a particular size class. However, all CUNA members, whether they are State leagues or individual credit unions, have the right to vote in the election to choose their particular directors. CUNA Bylaws, Article III, section 3.7.

The Board elects, from its membership, all of the officers of the organization (chairperson, vice chairperson, secretary and treasurer) except for the president, which is an appointed, salaried position. These officers, along with an additional board member, form an Executive Committee which exercises all the Board's powers in the management of the property and business of the organization when the Board is not in session. CUNA Bylaws, Article III, section 3.12(g).

Membership rights within Credit Unions

Under the Federal Credit Union Act, the San Antonio Credit Union and the Patriot Credit Union as Federal credit unions are Federally chartered corporations and cooperative associations. See 12 U.S.C. §§1752, 1754, 1757; see also Advisory Opinion 1990-18. Membership in both credit unions is by an application process. San Antonio Credit Union Bylaws, Article II, section 2 and Patriot Credit Union Bylaws, Article II, section 2. As part of the application process, members pay for shares in the credit unions and receive certain benefits in return. These include the right to receive dividends, the right to vote for members of the Board of Directors and the right to be considered for loans and lines of credit. See San Antonio Credit Union Bylaws, Article XIV, section 1

⁵ You explain that this category would be for credit unions which operate outside the geographic area of the State leagues (i.e., in United States territories) or a credit union operating under the National Credit Union Administration and serving American civilian personnel in foreign nations. However, CUNA currently has no members that are not also members of its State leagues. Therefore, this opinion will be limited only to credit union members that are State league members and will not reach any issues regarding the status of credit unions that must apply directly for membership in CUNA.

⁶ Among the powers of the Board is the right to establish salary levels for CUNA personnel, ratify contracts, approve the budget, borrow funds, appoint certain officers, propose amendments to the bylaws and mortgage property. *Id.*

and Patriot Bylaws, Article XIV, section 1 (dividends); San Antonio Credit Union Bylaws, Article V, section 2 and Patriot Bylaws, Article VI, section 5 (voting); San Antonio Bylaws, Article XIII, section 2-8 and Patriot Credit Union Bylaws, Article XII, Section 1 (loans and lines of credit).

Both credit unions are structured with a board of directors that is charged with the general direction and control of the credit unions. San Antonio Bylaws, Article VII, section 5; Patriot Credit Union Bylaws, Article VII, section 4.

Deduct-A-Buck program

Among the ways CULAC proposes to raise money is through the "Deduct -A-Buck" program. You state that, under this program, CULAC would solicit individual members (i.e., account holders) of the credit union members (of CUNA) to make contributions to CULAC, or to a State league PAC, via preauthorized automatic account transfers. Participating credit unions would execute written, prior approval agreements allowing the solicitation of their members pursuant to 2 U.S.C. §441b(b)(4)(D) and 11 CFR 114.8(c) and (d). Thereafter, individual account holders who choose to participate would sign automatic account transfer forms that would instruct their respective credit unions to transfer funds either weekly, monthly, quarterly or annually from the members' individual accounts. The credit union would set up debits from the members' individual accounts and submit the funds directly to the State leagues via wire transfer, money order or share draft. You state that both the credit union and the State leagues would ensure that the contributions are received by CULAC within ten or thirty days, as required by 11 CFR 102.8. The leagues would have the option to split the contributions between CULAC and their own PACs, if state law permits, as authorized by the contributor. Copies of a Deduct-A-Buck brochure, a prior approval agreement and an automatic account transfer form are included with this request.

Regarding the described proposal, you ask: (1) May CULAC solicit voluntary contributions from the individuals who are members of CUNA's member credit unions? (2) May the State leagues and member credit unions serve as "collecting agents" for CULAC and the State league PACs? (3) Is the automatic account deduction used in this proposal a permissible method of soliciting contributions to CULAC and the State league PACs?

ACT AND COMMISSION REGULATIONS

Commission regulations define a federation of trade associations as "an organization representing trade associations involved in the same or allied line of commerce." 11 CFR 114.8(g)(1). Commission regulations explain the federation's role for purposes of the Act as follows:

- (1) ... Such a federation may, subject to the following limitations, solicit the members of the federation's regional, State or local affiliates or members, provided that all of the political committees established,

financed, maintained or controlled by the federation and its regional, State, or local affiliates or members are considered one political committee for the purposes of the [contribution] limitations. The factors set forth at section 100.5(g)(4) shall be used to determine whether an entity is a regional, State or local affiliate of a federation of trade associations.

(i) The federation and its member associations may engage in a joint solicitation; or

(ii) The member association may delegate its solicitation rights to the federation.

(2) A federation is subject to the provisions of this section when soliciting the stockholders and executive or administrative personnel of the corporate members of its member associations. 11 CFR 114.8(g)(1) and (2).

Under Commission regulations, a trade association is generally a membership organization of persons engaged in certain activities, and a federation of trade associations would fall within this same framework. See 11 CFR 114.8(a) and 114.8(g). As one type of membership organization, the trade association must also possess certain attributes. It must (i) expressly provide for "members" in its articles and bylaws; (ii) expressly solicit members; and (iii) expressly acknowledge the acceptance of membership, such as by sending a membership card or inclusion on a membership newsletter list. 11 CFR 100.8(b)(4)(iv)(A), 114.1(e)(1).

On the question of what constitutes membership for purposes of the Act, the Supreme Court has suggested that members of non-stock corporations are to be defined, at least in part, by analogy to stockholders of business corporations and members of labor unions. See *FEC v. National Right to Work Committee*, 459 U.S. 197, 202 (1982), see also *Chamber of Commerce v. FEC*, 69 F. 3d 600 (D.C. Cir. 1995); *petition for rehearing denied*, 76 F. 3d 1234 (1996).⁷

⁷ In 1993, the Commission revised its membership regulations to further define the term "members." However, the court in *Chamber* determined that portions of those regulations were invalid, concluding that they defined the term "member" in an unduly restrictive fashion. See *Chamber* at 604. (There were not four votes at the Commission to seek further judicial review of this decision.) The regulation at 11 CFR 114.1(e)(2), now invalid in the District of Columbia Circuit, had defined members to mean:

all persons who are currently satisfying the requirements for membership in a membership association, who affirmatively accept the membership association's invitation to become a member, and who:

(i) Have some significant financial attachment to the membership association, such as a significant investment or ownership stake (but not merely the payment of dues);

(ii) Are required to pay on a regular basis a specific amount of dues that is predetermined by the association and are entitled to vote directly either for at least one member who has full participatory and voting rights on the highest governing body of the membership association, or for those who select at least one member of those on the highest governing body of the membership association; or

(iii) Are entitled to vote directly for all of those on the highest governing body of the membership association.

Under the Act and Commission regulations, a corporation, including an incorporated trade association, may use general treasury funds, including dues monies or membership fees, for the establishment, administration, and solicitation of contributions to its separate segregated fund, and such support would not result in a contribution to that fund. 2 U.S.C. §441b(b)(2)(C); 11 CFR 114.1(a)(2)(iii) and 114.5(b). An organization such as an incorporated trade association, which is not itself a political committee, but which directly or indirectly establishes, administers, or financially supports a political committee, is a "connected organization" of that committee. 2 U.S.C. §431(7); 11 CFR 100.6(a).

The connected organization and its SSF are subject to restrictions as to the category of persons who may be solicited for contributions to the committee. 2 U.S.C. § 441b(b)(4)(A) and (D); 11 CFR 114.5(g)(1) and 114.8(c). Specifically, an incorporated trade association may solicit its executive and administrative personnel, the families of such personnel, and its unincorporated members. 11 CFR 114.7(a). In addition, it may solicit the stockholders and executive and administrative personnel, and the families of such stockholders and personnel, of the member corporations that separately and specifically approve the solicitations and that have not approved a solicitation by any other trade association for the same calendar year. 11 CFR 114.8(c).

A collecting agent is defined in 11 CFR 102.6(b) as an organization or committee that collects and transmits contributions to one or more separate segregated funds to which the collecting agent is related. A collecting agent may be either: (i) a committee, whether or not it is a political committee as defined in 11 CFR 100.5, affiliated with the separate segregated fund under 11 CFR 110.3; or (ii) the connected organization of the separate segregated fund as defined in 11 CFR 100.6; or (iii) a parent, subsidiary, branch, division, department, or local unit of the connected organization of the separate segregated fund; or (iv) a local, national or international union collecting contributions on behalf of the separate segregated fund of any federation with which the local, national, or international union is affiliated. See 11 CFR 102.6(b)(1)(i) to (iv).

A collecting agent, if it is an unregistered organization that follows the procedures set out in 11 CFR 102.6(c), is not required to register and report as a political committee under 11 CFR Parts 102 and 104, provided that the organization does not engage in other activities such as making contributions or expenditures for the purpose of influencing Federal elections. 11 CFR 102.6(b)(2). The collecting agent may pay any or all of the costs incurred in soliciting and transmitting contributions to the separate segregated fund. 11 CFR 102.6(c)(2)(i). The full amount of each contribution collected by the collecting agent on behalf of a separate segregated fund shall be transmitted to that fund within 10 or 30 days as required by 11 CFR 102.8. 11 CFR 102.6(c)(4).

The Commission's regulations specifically provide that a member corporation of a trade association "may not use a payroll deduction or checkoff system for executive or administrative personnel contributing to the separate segregated fund of the trade

association.” 11 CFR 114.8(e)(3). The Commission has interpreted this regulation as applicable to the solicitation for contributions from employees of a member corporation of a trade association who are also stockholders of the corporation. See Advisory Opinion 1989-3.

APPLICATION TO CUNA PROPOSAL

Solicitation of credit union account holders by CULAC

Membership status of CUNA and individual credit unions.

In Advisory Opinion 1991-24, the Commission concluded that CUNA was a membership organization with “members” who qualified as such under the Act. Although the 1991 opinion was issued prior to the 1993 revisions to the membership regulations, the facts in this request lead the Commission to re-affirm that conclusion.⁸ The Commission further concludes that CUNA’s Board of Directors, rather than the Executive Committee, is the highest governing body of CUNA for purposes of the Commission regulations.⁹ Lastly, the Commission concludes that the individual credit union members of CUNA would be considered “members” for purposes of the Act and Commission regulations.¹⁰ The Commission notes that these members pay dues and all have the right to vote for the highest governing body, or for those who choose the members of that body. Thus, the membership criteria of CUNA would have satisfied even the more restrictive standard struck down in *Chamber*.¹¹ See footnote 7.

The Commission previously considered the status of credit unions under the Act in Advisory Opinion 1990-18. Noting the status of a Federal credit union under Federal

⁸ For example, Article II of CUNA’s Bylaws meets the requirements of the regulations at 11 CFR 100.8(b)(4)(iv)(A)(i) and 114.1(e)(1) by expressly providing for membership. Your request includes materials which indicate that CUNA solicits members from within the eligible group of credit unions and related entities. See 11 CFR 100.8(b)(4)(iv)(A)(ii) and 114.1(e)(1). The request materials also indicate compliance with the requirement that membership be expressly acknowledged.

⁹ This conclusion is based on the limitations on the power of the Executive Committee and the delegated nature of the powers from the Board.

¹⁰ The Commission acknowledges that the portion of the regulations that were not affected by the *Chamber* decision require that the members of an organization “affirmatively accept” membership in the organization. In the case of CUNA, membership for individual credit unions is automatic with their membership in a State league. However, this requirement must be seen in terms of the federation structure of CUNA (see discussion below) and the exclusive potential membership pool (i.e., only credit unions and State credit union leagues) for CUNA. The Commission construes the affirmative acceptance on behalf of the credit unions as being given on their behalf by the State league members.

¹¹ Following the *Chamber* decision, the Commission published a notice of proposed rulemaking which may lead to regulation changes concerning the definition of membership. See FEC Notice of Proposed Rulemaking, published in the *Federal Register* on December 22, 1997, at pages 66832 through 66838. The conclusion of this opinion regarding membership could be modified or superseded by the adoption of any new regulations on membership criteria, but the opinion may be relied upon until any change is made. If a change is made, it will become effective on a specific date announced in the *Federal Register*. In addition, the Commission’s written explanation and justification for any new rules will identify each past advisory opinion that is modified or superseded.

law, as both a Federally chartered corporation and a cooperative association, the Commission applied the standard set in the *National Right to Work* opinion to determine if the shareholders of the credit union possessed “some relatively enduring and independently significant financial or organizational attachment” to permit their solicitation to a credit union’s PAC for political donations. It concluded in the affirmative.

Similarly, the Commission concludes here that the shareholders of the San Antonio Credit Union and the Patriot Credit Union, because of their financial attachments and rights of governance within each corporation, would qualify as members of a membership association under the Act and Commission regulations and may be solicited for political contributions to CULAC by those entities qualified to conduct the solicitation.

Permissibility of solicitation

The Commission regulations expressly permit the solicitation of the shareholders of the member corporation of a trade association for contributions to the trade association’s PAC, but are silent regarding the solicitation of “members” of non-stock corporations. In Advisory Opinion 1982-12, the Commission permitted a trade association to solicit the individual members of its corporate members that were corporations without stock. The Commission noted the equity interest held in the member corporation and its close analogy to shareholders' rights in a stock corporation. See Advisory Opinion 1982-12. In a related analysis in Advisory Opinion 1984-63, the Commission noted the close parallel between shareholders within a savings and loan association and stockholders within a corporate structure:

although the interest of a member of a mutual savings and loan association is not identical with interest held by a shareholder of a business corporation... The interests have several prominent features in common, including the right to vote for directors, the right to receive surplus profits as declared by the board of directors, and the right to pro rata share of assets on dissolution.

The Commission believes that the same rights are held by shareholders of a credit union. In this specific circumstance, as noted above, the ties between the individual members (or share account holders) of the San Antonio Credit Union and the Patriot Credit Union would permit the solicitations for contributions to the SSF’s of those entities, if they existed. The Commission likewise concludes that the analogy to stockholder in a corporation (with stock) is close enough to permit the solicitation by a trade association SSF of the shareholders of member credit unions under 11 CFR 114.8(c). Therefore, in response to your first question, CULAC may solicit contributions from individuals who are members of CUNA’s member credit unions, provided that

CUNA (and CULAC) comply with the procedures regarding contribution solicitations by trade associations in the Commission's regulations.¹²

State leagues and member credit unions as collecting agents of CULAC

CUNA as federation of trade associations

The materials provided with your request also confirm the previous comment noted in Advisory Opinion 1991-24 that CUNA appeared to be a federation of trade associations. The Bylaws of both the Texas and Pennsylvania Leagues explicitly identify their organizations as State affiliates of CUNA. Texas League Bylaws, Article I, section 2 and Pennsylvania League Bylaws, Article III, section 2. Applying the factors found at 11 CFR 100.5(g), the Commission notes several links between CUNA, the State leagues and the member credit unions of those leagues, which affirm a federation structure. First, there is overlapping membership between CUNA and the State leagues. See 11 CFR 100.5(g)(4)(ii)(D). As noted above, all the credit union members of the State leagues are automatically members of CUNA. CUNA Bylaws, Article II, section 2.2. A credit union, in most circumstances, cannot join CUNA unless it belongs to a State league.¹³ If it were to withdraw from the league, membership in CUNA is forfeited. *Id.* at 2.4.¹⁴ Second, the State leagues and credit unions may participate in the governance of CUNA through their participation in CUNA's board of directors. See 11 CFR 100.5(g)(4)(ii)(B). A quarter of the seats on the CUNA Board are reserved for State league presidents. The rest are elected credit union representatives who must be members of the credit union. CUNA Bylaws, Article III, section 3.7.¹⁵ Finally, there are significant financial interactions between CUNA, the State leagues and the State league credit unions given the financial support that passes from these credit unions through the State leagues and on to CUNA. See 11 CFR 100.5(g)(4)(ii)(G) and (H).

State leagues and credit unions as collecting agents

The Commission in Advisory Opinion 1989-3 stated (in a footnote and without explanation) that the corporate members of a trade association could not act as collecting

¹² As you acknowledge in your request, CUNA must first obtain the prior approval of its credit union members before making solicitations on behalf of CULAC, and each credit union may grant permission to CUNA only if it has not already given similar permission to another trade association for the same calendar year. 11 CFR 114.8(d).

¹³ See footnote five which describes the exception to this CUNA membership policy.

¹⁴ The Commission notes that this situation contrasts with that of the United States Savings Association ("USSA") in Advisory Opinion 1983-28. In that opinion, the Commission stated that, because it had a separate category for organization State leagues and individual savings institutions, USSA was a trade association as to its individual savings institution members and a federation of trade associations as to the State leagues. However, USSA did not have a provision in its bylaws automatically linking membership in the State league with membership in the national organization, as is the case here, thereby indicating a more federation-like structure.

¹⁵ The Bylaws of both the Texas and Pennsylvania leagues refer to the process whereby delegates to the CUNA board of directors are chosen. See Texas League Bylaws Article XI and Pennsylvania League Bylaws Article VI, section 6.

agents for the trade association.¹⁶ However, the Commission has not previously considered whether the local corporate members of State associations that are members (and affiliates) of a federation of trade associations could act as collecting agents for the PAC (or SSF) of the federation.¹⁷ The Commission believes that the situation of a federation of trade associations is distinguishable from the customary trade association structure since, by definition, the federation presents a highly integrated structure with multiple tiers of organizational membership and related governance powers linking the tiers. The Commission therefore concludes that the State leagues of CUNA and the credit union members of the State leagues may be considered as a “branch, division ... or local unit” of CUNA under 11 CFR 102.6(b)(1)(iii) and may therefore act as collecting agents in receiving and transmitting contributions for CULAC.¹⁸

Permissibility of CUNA’s “Deduct-A-Buck” program

Your final question concerns whether the “Deduct-a-Buck” program is permissible given 11 CFR 114.8(e)(3) which prohibits a member corporation of a trade association from using a payroll deduction or checkoff system for executive or administrative personnel contributing to the separate segregated fund of the trade association. The Commission concludes that section 114.8(e)(3) is inapplicable to the Deduct-A-Buck program, since the funds involved would not be deducted by means of a payroll deduction system administered by the employer of the contributing member account holders.¹⁹ As the request notes, where employee payroll deductions were not at issue, the Commission has permitted various forms of contribution made by pre-authorized account deductions. See Advisory Opinions 1997-9 (use of trader’s margin account), 1989-26 (use of contributor’s personal bank account) and 1986-7 (use of agricultural cooperative member’s account).

¹⁶ The Commission noted that the individual corporate members of the Employee Stock Ownership Association “do not meet any of the disjunctive criteria set out in 11 CFR 102.6(b)(1)(i)-(iv) so as to qualify as ‘collecting agents’ for the Association.” Advisory Opinion 1989-3. See also Advisory Opinion 1985-37, where the Commission concluded that membership in a organization, without more, was not a sufficient nexus to permit the member to qualify as a collecting agent.

¹⁷ In Advisory Opinion 1995-12, the Commission permitted the State affiliates of a national trade association to act as collecting agents for the national trade association. See also Advisory Opinion 1985-12.

¹⁸ The Commission notes that as collecting agents for CUNA, the State leagues and the member credit unions of the State leagues must follow the requirements established by 11 CFR 102.8 and 102.6(c)(4) regarding the time limits for the transmittal of contributions to CULAC. The affiliation of CULAC with any PACs (or SSFs) of the credit union members of a State league would be determined by application of the factors in Commission regulations at 11 CFR 100.5(g)(4). See also footnote two.

¹⁹ The Commission notes its earlier analogy between stockholders in a corporation and shareholders in a credit union and Advisory Opinion 1989-3 which indicates the applicability of section 114.8 to certain shareholders. However, what was prohibited in Advisory Opinion 1989-3 was the use of a payroll deduction program to facilitate contributions to a trade association by employees of member corporations who were also shareholders. Payroll accounts are not at issue in this request. Should CUNA and CULAC solicit participation in the “Deduct-A-Buck” program of persons who are both employees and members of the same credit union, such participation would still be permissible as long as the deductions were made to the credit union accounts, rather than the employee payroll accounts of the credit union.

The Commission, however, notes a deficiency in the brochure included in CUNA's request which would be sent to credit union members. Section 114.5(a)(4) of Commission regulations requires that a solicitation inform the employee or member being solicited "of his or her right to refuse to so contribute without any reprisal." While the brochure states that the contributions are "voluntary" it does not include a statement that there would be no reprisal should the member refuse to contribute. This deficiency would need to be corrected before the brochures could be used in the proposed solicitations.

This response constitutes an advisory opinion concerning the application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. §437f.

Sincerely,

signed

Scott E. Thomas
Acting Chairman

Enclosures (AOs 1997-9, 1995-12, 1991-24, 1990-18, 1989-26, 1989-3, 1986-7,
1985-12, 1985-37, 1984-63, 1983-28 and 1982-12)