



# North Carolina Democratic Party

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
JAN 12 10 31 AM '01

220 Hillsborough Street  
Raleigh, NC 27603

January 4, 2001

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Ms. Lois Lerner  
General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

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Dear Ms. Lerner:

AOR 2001-01

Pursuant to 2 U.S.C. 437f, the North Carolina Democratic Party seeks an Advisory Opinion on the following:

The North Carolina Democratic Party is preparing to embark on a wholesale restoration and renovation of its historic headquarters building in Raleigh, NC.

We believe, based on past policy and opinions of the Commission, that the actual expenditures for the restoration and renovation, machinery and equipment, furniture and fixtures, and other similar property may be made from the Party's Building Fund (see A.O.1998-7).

There are two specific areas that we seek clarification on:

1. May expenditures such as construction management and architectural fees directly and solely related to the restoration and renovation project be paid from the Party's Building Fund?
2. Based on the Funds received method of allocating expenses, may fundraising expenses be paid from the Party's Building Fund? (As an example, if the Party hires an employee or consultant whose **sole** responsibility is raising funds into the Building Fund for this project, may the salary or fee and other expenses associated with that employee or consultant be paid for from the Party's Building Fund?)

If you need further information, please feel free to contact me. We look forward to a reply as soon as possible.

Sincerely,

Scott R. Falmlen  
Executive Director