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To <dpugh@fec.gov>
cc "Woodson, Andrew" <AWoodson@wrf.com>,
<mjohnson@fec.gov>, <rsmith@fec.gov>

bcc

Subject RE: AOR re Rep. Kay Granger

Dear Mr. Pugh,

Supplement to AOR 2006-18

I am glad to confirm that the campaign expects to incur more than de minimis expenses in connection with Congresswoman Granger's book.

First, please be advised that there will be numerous book events both within and outside the congressional district. The request describes the first such event which will be held on July 4, 2006. There will be events in addition to that one and there will be similar web postings and emails from the campaign.

Second, paid committee personnel will be involved in garnering information about the events, posting and updating web site information as well as drafting and sending emails to supporters, and handling any resulting public and press inquiries. There will be associated web site costs. Since submitting the request I have been advised that campaign staff has expressed an interest in organizing and attending such book signing events if permissible. All of these functions indicate that more than a de minimis amount of campaign funds will be spent in connection with book promotional activities. The legal principle raised by the request is similar to those previously addressed by the Commission in advisory opinions in which campaigns actually purchased copies of the candidate's books. Book purchase expenses presumably were not de minimis. In this instance the expenses consist of campaign personnel, web site costs and predictable ancillary promotional expenses. The Commission has not established a dollar amount that constitutes "de minimis." The Granger campaign anticipates that expenses associated with book promotional activities could run into hundreds if not thousands of dollars. We assume such costs are not considered de minimis or nominal.

I trust that this is the information you and the Commission need in order to issue an opinion.

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