



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: THE COMMISSION
STAFF DIRECTOR
GENERAL COUNSEL
FEC PRESS OFFICE
FEC PUBLIC DISCLOSURE *MST*

FROM: COMMISSION SECRETARY

DATE: FEBRUARY 6, 2007

SUBJECT: COMMENT ON DRAFT AO 2006-36
Green Senatorial Campaign Committee

Transmitted herewith is a timely submitted comment from Dean Myerson, Treasurer of the Green Senatorial Campaign Committee, regarding the above-captioned matter.

Proposed Advisory Opinion 2006-36 is on the agenda for Thursday, February 8, 2007.

Attachment



Green Senatorial Campaign Committee
PO Box 8048, Minneapolis, MN 55408
612.730.8837

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FEDERAL ELECTION
COMMISSION
SECRETARIAT

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- Chair

Anita Weasling
- Vice-Chair

Brent White
- Secretary

Eric Oliva
- Asst. Treasurer

Dave Jette

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Non-voting:

Dean Myerson
- Treasurer

February 6, 2007

To the Commission Secretary,

Please accept this comment in response to Draft Advisory Opinion 2006-36.

We would like to point out two discrepancies between the draft advisory opinion, and the Federal Election Campaign Act and the Commission's regulations.

First, 2 USC SS 441a(a)(4) and 11 CFR 110.3(c)(1) remove the restrictions on transfers among local, district, state, national, and subordinate party committees within a particular political party. This is also indicated by the chart on page 27 of the Political Party campaign guide. The conclusions in response to question 2 (part B) in the draft AO omit this and thus imply that such transfers are limited as to amount.

Second, 2 USC 439a(a)(4) and 11 CFR 113.2(c) allow authorized candidate committees to contribute to party committees without limit. The Commission reasserted this allowance in Advisory Opinion 2004-22. This is also indicated by the chart on page 27 of the Political Party campaign guide. The conclusions in response to question 2 (part B), imply that all "persons" (including authorized candidate committees, which are included in the definition of "person" in 2 USC 431(11) and 11 CFR 100.10) are limited to contributing \$28,500 per year to each national party committee.

Thank you for considering the additional information in this comment.

Sincerely,

Dean Myerson
Treasurer, Green Senatorial Campaign Committee

Cc: Office of General Counsel