



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Commission Secretary's Office 

DATE: October 8, 2014

SUBJECT: Comments on Draft AO 2014-12
(Democratic National Committee and
Republican National Committee)

Attached are timely submitted comments received from Robert E. Rutkowski. This matter is on the October 9, 2014 Open Meeting Agenda.

Attachment



"Robert E. Rutkowski"

10/07/2014 05:37 PM

To <info@fec.gov>.

cc

bcc

Subject Comment on Advisory Opinion Request 2014-12 (National Party Convention Financing)

History: This message has been forwarded.

Office of General Counsel

Attn: Adav Noti, Acting Associate General Counsel for Policy

Federal Election Commission

999 E Street N.W.

Washington, DC 20463

info@fec.gov

Re: Comment on Advisory Opinion Request 2014-12 (National Party Convention Financing)

Dear Mr. Noti:

Do not to allow national party committees to exceed contribution limits when raising private money to pay for the party nominating conventions.

Reject a request from the Republican and Democratic National Committees to permit the parties to exceed existing contribution limits. The parties filed the request in August, but draft responses by the FEC staff to the request were not made public until this week.

Following passage this year of the "Gabriella Miller Kids First Research Act" (H.R. 2019), which ended public financing of the conventions and "authorized" those funds to be used to finance pediatric research, the Republican National Committee (RNC) and Democratic National Committee (DNC) requested that the FEC allow the parties to raise additional private funds beyond the contribution limits to make up for the loss of public funds.

Because of earlier FEC advisory opinions, our national party conventions have been transformed from meaningful party-building events into today's influence-peddling soirees, extravagantly financed by special interests. The FEC should not make the same mistake again by allowing even more private money to finance the conventions.

After the 1972 IT&T slush fund scandal, in which the company pledged \$400,000 to finance the Republican national convention and then received favorable treatment from the Nixon administration in an anti-trust settlement, Congress approved public financing of the conventions. The public financing program was designed to replace special interest money and cap total expenditures on the conventions. But in the 1980s, the FEC began to whittle away at this program by allowing special interest money to be funneled into the conventions through "host committees." Within a decade, special interest money became the primary source of convention funding, surpassing the public fund allotment by 3-to-1 or more.

U.S. Rep. Gregg Harper (R-Miss.) in the last congressional session introduced several bills to defund the entire presidential public financing program, but they went nowhere. This year, Harper modified his approach. He introduced legislation ending public financing for the party conventions and authorizing those funds to be used for pediatric research in the name of Gabriella Miller, a child who recently died from brain cancer. H.R. 2019 passed Congress and was signed into law. But none of the money has been appropriated for pediatric research.

The problem is the convention public funds have not been appropriated by Congress for pediatric research, and may never be. The FEC should find out why Congress is not using the funds to pay for pediatric research before opening yet another spigot of special interest money to the parties.

Federal law clearly establishes contribution limits to the party committees, and that allowing the parties to raise additional private money beyond these limits would be contrary to law.

Thank you for the opportunity to bring these remarks to your attention.

**Yours sincerely,
Robert E. Rutkowski**

cc House Minority Leadership

**Topeka, Kansas
P/F:
E-mail:**

Re: PC comments: http://www.citizen.org/documents/Gabriella_Miller_AO_Request.pdf