



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Office of the Commission Secretary ^{VFV}

DATE: November 30, 2022

SUBJECT: Comment Regarding AOR 2022-24 (Allen Blue) from Campaign Legal Center ("CLC")

Attached is a comment received from Campaign Legal Center ("CLC"). This matter is on the December 1, 2022 Open Meeting Agenda.

Attachment

RECEIVED

By Office of the Commission Secretary at 12:05 pm, Nov 30, 2022



RECEIVED

By Office of General Counsel at 11:51 am, Nov 30, 2022

Lisa J. Stevenson
Acting General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463
ao@fec.gov

RE: Advisory Opinion Request 2022-24 (Allen Blue)

Dear Ms. Stevenson,

Campaign Legal Center (“CLC”) respectfully submits this comment regarding the Commission’s draft advisory opinions regarding Advisory Opinion Request 2022-24 (Allen Blue).

The Commission has long treated inter vivos trusts as pass-through entities for attribution purposes, with contributions by the trust attributed to the underlying individual. *See* Advisory Opinion 1999-19. Draft B improperly departs from this approach and, as detailed in the comment of Brendan Fischer, lacks any basis in law.

Thus, as between the two draft advisory opinions published for public consideration, CLC would prefer the approach outlined in Draft A.

We thank the Commission for the opportunity to submit this comment.

Sincerely,

/s/ Saurav Ghosh

Saurav Ghosh
Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005