



December 10, 2024

Lisa J. Stevenson, Esq.
Acting General Counsel
Federal Election Commission
1050 First St. NE
Washington, DC 20463

Re: REG 2024-06 (Requests to Modify or Redact Contributor Information) – Notice of Proposed Rulemaking

Dear Ms. Stevenson:

Campaign Legal Center (“CLC”) respectfully submits this comment in REG 2024-06 (Requests to Modify or Redact Contributor Information), which is on the Commission’s agenda for the Open Meeting on December 12, 2024.¹ Specifically, we urge the Commission to adopt Draft B of the Notice of Proposed Rulemaking (“NPRM”), which in contrast to Draft A appropriately solicits public comment on the propriety and scope of the proposed rule to modify or redact contributors’ information from public disclosure reports.²

Unlike Draft A, Draft B appropriately asks the threshold question of *whether* the Commission should proceed with a rulemaking to exempt certain contributor information from the disclosure requirements in the Federal Election Campaign Act (“FECA”).³ This is a necessary question that Draft A neglects to consider; to meaningfully participate in elections, voters need complete and accurate information regarding the sources of money influencing elections. And answering “No” to this threshold question — *i.e.*, declining to proceed with a rulemaking — would not mean contributors who face threats, harassment, or reprisals based on the disclosure of

¹ See Fed. Election Comm’n, December 12, 2024, Open Meeting Agenda, <https://www.fec.gov/updates/december-12-2024-open-meeting/>.

² See REG 2024-06 (Requests to Modify or Redact Contributor Information), NPRM Draft B (Dec. 5, 2024), <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-44-B.pdf> (“Draft B”).

³ *E.g., id.* at 3–4 (“The Commission is now considering whether to establish a procedure to formalize the submission and consideration of requests by individual contributors when reasonable probability exists that the contributors may face threats, harassment, or reprisal.”).

