



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Office of Commission Secretary *LCS*

DATE: December 12, 2024

SUBJECT: *Ex Parte* Communication Regarding REG 2024-06
(Requests to Modify or Redact Contributor
Information) Draft Notice of Proposed Rulemaking

Transmitted herewith is an *ex parte* communication with Chairman Sean J. Cooksey regarding the above matter.

Attachment

Laura Sinram

From: Sean Cooksey
Sent: Wednesday, December 11, 2024 7:14 PM
To: Commissioners Office; Policy Staff; Commission Secretary Office
Subject: FW: Agenda Documents No. 24-44-A and No. 24-44-B: Proposals Are Contrary to the Commission's Fundamental Mission to Facilitate Donor Disclosure in Federal Elections

Colleagues: I received the below ex parte communication to my email this evening. I am circulating it pursuant to the Commission policy on such communications.

Sincerely,
Sean

-----Original Message-----

From: Robert Rutkowski [REDACTED]
Sent: Wednesday, December 11, 2024 5:16 PM
To: Sean Cooksey [REDACTED]; CommissionerCooksey (External) <CommissionerCooksey@fec.gov>
Subject: Agenda Documents No. 24-44-A and No. 24-44-B: Proposals Are Contrary to the Commission's Fundamental Mission to Facilitate Donor Disclosure in Federal Elections

Sean Cooksey, Chair
Federal Election Commission
1050 First St. NE
Washington, DC 20463
[REDACTED] CommissionerCooksey@fec.gov

Re: Agenda Documents No. 24-44-A and No. 24-44-B: Proposals Are Contrary to the Commission's Fundamental Mission to Facilitate Donor Disclosure in Federal Elections

Dear Chair:

This week, the Federal Election Commission (FEC) is set to take up a proposal to scale back disclosure requirements, offering exemptions to donors who say they fear intimidation. In response, transparency advocacy organizations Public Citizen and Transparency International U.S. filed a letter, <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.citizen.org%2Farticle%2Fanti-transparency-proposals-before-the-fec-are-contrary-to-the-commissions-core-mission-to-enhance-donor-disclosure%2F&data=05%7C02%7CLSinram%40fec.gov%7C964c73fd2cc44d49a1d108dd1a41e597%7Cee91fa706c9d45e0bb084a355de91010%7C0%7C0%7C638695592543490408%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoiTWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=r%2B2HWEK5Gmr%2F%2B5%2FWY0wF1rzEa6USHVDKipHyqPoCWkE%3D&reserved=0>, of comment to the commission, vigorously opposing the proposal, saying it undermines the FEC's core mission of transparency and accountability in federal elections.

The letter says the proposed regulation is a solution "in search of a problem that does not exist, and would have the consequence of setting back the Federal Election Campaign Act's – and the Commission's – primary mission: enhanced donor disclosure of money in politics." A petition circulated by Public Citizen opposing the proposal also garnered 4,000+ signatures in 24 hours.

This incomprehensible proposal would set back the nation's hard-fought campaign finance disclosure system. There is simply no justification for obstructing voters' right to know who is financing and influencing their federal elections.

It is unthinkable that the world's oldest democracy, a mere month after the most expensive elections in world history, would even entertain the idea of further weakening the American people's right to know who is influencing their elections. The United States must continue to lead the global fight for democracy, and the FEC's rejection of this wrongheaded proposal will help ensure it can do so with credibility.

Yours sincerely,
Robert E. Rutkowski

