

SUMMARY OF ADVISORY OPINION REQUESTS

- AOR 1975-1 Convention Financing:** whether "in-kind" services provided by a host city for a national convention must be included in the national convention expenditure limit. (June 24, 1975, Federal Register (FR) p. 26660: Opinion published July 15, 1975).
- AOR 1975-2 Party Committee status:** numerous questions concerning political party committee responsibilities under the reporting and expenditure limitation provisions of the law. (June 24, 1975, FR p. 26660).
- AOR 1975-3 Office-holder services:** whether various services provided to incumbent officeholders, by Senate or House campaign committees, such as preparation of newsletters and questionnaires and reprinting of Congressional Record statements, are considered campaign contributions or expenditures. (June 24, 1975, FR p. 26660).
- AOR 1975-4 Telethon expenses:** whether financial transactions involved in preparing a nationally televised fund-raising telethon are considered expenditures under the financing law. (June 24, 1975, FR, p. 26660: Opinion published July 15, 1975).
- AOR 1975-5 and 6 Debt cancellation:** whether current contribution limits are applicable to contributions made this year to satisfy debts incurred in campaigns from prior years when there were no such contribution limits. (June 24, 1975, FR p. 26660: Opinion published July 25, 1975).
- AOR 1975-7 Constituent service funds:** whether political committees set up to administer a Member of Congress' constituent service funds, or constituent polls conducted by a Member of Congress, fall within campaign disclosure definitions and requirements; and whether a corporation may contribute to a constituent service fund. (July 2, 1975, FR p. 28044).
- AOR 1975-8 Honorariums:** whether a Member of Congress who has already reached the \$15,000 calendar year honorarium limit, may thereafter request that an offered honorarium be donated to a charity, and whether such Member of Congress may still receive travel and subsistence expenses. (July 2, 1975, FR p. 28044).
- AOR 1975-9 Unopposed primary candidate:** whether a Federal candidate unopposed in the primary election can spend the maximum amount permitted for primary elections. (July 9, 1975, FR p. 28944).
- AOR 1975-10 Fund transfers:** Miscellaneous questions about the status of fund transfers, including transfer from official checking account campaign depository into savings account; transfer of state election campaign surplus funds to federal committee; whether individual donors must be named when the residual funds of an existing political committee are earmarked for a Federal candidate and whether a single committee can raise funds for both "political" and "constituent service" functions of an incumbent Member of Congress. (July 9, 1975, FR, p. 28944).
- AOR 1975-11 Dual candidacy:** whether candidates for two Federal offices at the same time can raise money from separate committees, and whether separate contribution and expenditure limits apply for each election (July 9, 1975, FR, p. 28944).
- AOR 1975-12 Presidential primary delegates:** whether Federal reporting requirements apply to the selection process for election of delegates to a party's national presidential nominating convention, (including election of delegates to precinct, county, and state conventions). (July 9, 1975, FR, p. 28944).

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AOR 1975-13 Travel Expenses, Source: whether a candidate may receive travel expenses from a Chamber of Commerce whose source of funds includes dues from corporations. (July 17, 1975, FR p.30258)

AOR 1975-14 Constituent Service Fund Contributions: whether a national bank or a union may contribute to a Member of Congress' constituent service fund, and whether a corporation may use its computer to help a Member of Congress tabulate a constituent poll. (July 17, 1975, FR p.30258)

AOR 1975-15 Candidate Royalties: whether a campaign committee may pay royalties to a candidate it is supporting. (July 17, 1975, FR p.30258)

AOR 1975-16 Incorporated Association-Miscellaneous Committee Questions: whether an incorporated association may make a Federal campaign contribution; also, miscellaneous committee questions, including; whether a candidate may have more than one committee; whether reports are required for reporting periods during which no more than \$1000 was received or expended; and whether there is a time limit for depositing contributions into the official campaign depository. (July 17, 1975, FR p.30258)

AOR 1975-17 Partnerships: what contribution limits apply in a contribution from a two or three member partnership. (July 17, 1975, FR p.30258)

AOR 1975-18 Inactive Committees: whether "inactive" committees with outstanding debts (where debt is in litigation, or where there is no expectation of raising funds to pay it off) must continue to file financial disclosure reports. (July 29, 1975, FR p.31878)

AOR 1975-19 Unauthorized Committees: The law requires that committees formed on behalf of a candidate, but not authorized by that candidate, must print a disclaimer notice on its literature concerning the lack of authorization. Is that disclaimer requirement "the only effect" of such lack of authorization? (July 29, 1975, FR p. 31878)

AOR 1975-20 Voter Registration Activities: whether numerous voter registration and education activities of a union's political education committee are permissible. (July 29, 1975, FR p.31878)

AOR 1975-21 Local Party Committee Accounts: where a local party committee supports Federal candidates through a separate Federal account, may corporate contributions be used in the general account that pays the committee's daily operational expenses. (July 29, 1975, FR p.31879)

AOR 1975-22 Committee Transactions: what is the reporting status of incidental expenses of a committee authorized to raise funds, but not to make campaign expenditures? Does a principal campaign committee incur a receipt and expenditure when it simply endorses a check over to a state party committee? (July 29, 1975, FR p.31879)

AOR 1975-23 Citizenship Program: whether a corporation's "Responsible Citizenship Program" is permissible. (July 29, 1975, FR p.31879)

AOR 1975-24 Constituent Service Funds-Newsletter Accounts: whether certain methods of soliciting contributions and particular types of reporting are in compliance with the Federal Election Campaign Act. Does money spent from these funds apply toward campaign expenditure limits? (August 20, 1975, FR p.36530)

AOR 1975-25 Multi-Candidate Committees: Are contributions to pay off pre-1975 debts subject to the \$5,000 limit? Are contributions to constituent service funds subject to the limitations in the 1974 Amendments? (August 20, 1975, FR p.36531)

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AOR 1975-26 Earmarked Contributions: Are funds deposited with multi-candidate committees, which are earmarked for a particular election in a specific state and a particular political party, but not a specific candidate, to be attributed to the limit of the multi-candidate committee? (August 20, 1975, FR p.36532)

AOR 1975-27 Accounting and Legal Fees: Are fees paid to accountants and attorneys to help with compliance of the Federal Election Campaign Act considered to be expenditures under 18 U.S.C. 608(c)? (August 20, 1975, FR p.36532)

AOR 1975-28 Expenditures of a Political Committee: May funds raised to support an individual's candidacy for President be used to support his candidacy for the Senate or other purposes in support of his duties as a Federal officeholder? (August 20, 1975, FR p.36532)

AOR 1975-29 Political Parties: What are the contribution limits for an official subordinate organization of a state political party? (August 20, 1975, FR p.36532)

AOR 1975-30 Office Accounts and Constituent Service Funds: May a campaign committee pay for newspaper subscriptions and reimburse travel expenses for a Member of Congress? (August 20, 1975, FR p.36532)

AOR 1975-31 Contributions to a Political Committee: May a husband and wife with a single family income each contribute \$1000.00 to the same candidate? May partners, officers or members of a business of a corporation which is holding a Government contract, contribute to a candidate? May their spouses contribute? (August 20, 1975, FR p.36532)

AOR 1975-32 Contributions by a Multi-candidate Committee: Are there limits on what a multi-candidate committee may contribute to the national committee of a political party? (August 20, 1975, FR p.36533)

AOR 1975-33 Fundraising Exemption: May a Presidential candidate use his full national fundraising exemption in one state? (August 20, 1975, FR p.36533)

AOR 1975-34 Multi-Candidate Committees: May a multi-candidate committee establish separate segregated funds for non-election purposes? (August 20, 1975, FR p.36533)

AOR 1975-35 Organization of Political Committees: May an individual be an officer or a member of more than one national fundraising committee? (August 20, 1975, FR p. 36534)

AOR 1975-36 Political Committee Expenditures: May a political committee pay a parent corporation for administrative costs incurred on behalf of that committee? (August 20, 1975, FR p.36534)

AOR 1975-37 Incorporated Political Committees: Is it legal under 18 U.S.C. 610 (prohibiting corporate contributions) for a political committee to organize as a non-profit corporation? (August 20, 1975, FR p.36534)

AOR 1975-38 Office Accounts and Constituent Service Funds: Can a Member of Congress use left-over campaign funds for legitimate office expenses? If so, must the campaign committee continue to file periodic reports? (September 3, 1975, FR p.40675)

AOR 1975-39 Corporate Contributions and Disposal of Debts: May a campaign committee which is unable to raise sufficient money to pay off debts owed to a corporation from a previous campaign make a cash settlement for less than the amount of the original debt without incurring a violation of 18 U.S.C. 610? (September 3, 1975, FR p.40676)

AOR 1975-40 Reporting: Whether all ticket purchases to a fundraising dinner by a political committee must be reported if individual contributions are less than \$100 in value? (September 3, 1975, FR p.40676)

AOR 1975-41 Campaign Depository: May receipts from contributions be deposited in interest-bearing accounts in National or State banks and may U.S. Treasury Notes be purchased? (September 3, 1975, FR p.40676)

AOR 1975-42 Purchase of Advertising Space in Yearbooks and Directories: Is the purchase of advertising space in a yearbook or directory applicable towards the campaign spending limit? (September 3, 1975, FR p.40676)

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AOR 1975-43 Title 18 U.S.C. -- Corporate Committees: 18 U.S.C. 610 places restrictions on how corporations may participate in the political process. May a corporation organize and administer a program in which employees designate specific candidates or parties and the corporation automatically makes payroll deductions and sends checks in the employees name? (September 3, 1975, FR p.40676)

AOR 1975-44 Minor or New Party Candidates: Does the \$1,000 limit on contributions apply separately to primary, runoff, special and general elections? Does it apply separately to candidates only running in the General election?

Petty Cash: Question pertaining to clarification of petty cash expenditure.

Debts and obligations: What constitutes a debt or obligation?

Non-Principal Campaign Committees: Whether non-principal campaign committees must be authorized in writing by a candidate.

Reporting requirements: Whether candidates and committees not involved in primaries are required to submit pre-election and post-election reports. (September 3, 1975, FR p.40677)

AOR 1975-45 Excessive Honorariums: Does a paid weekly television appearance fall under 18 U.S.C. 616? (September 3, 1975, FR p.40677)

AOR 1975-47 Clarification of AOR 1975-1: What services may a host committee for a national convention provide with corporate funds? (September 3, 1975, FR p.40677)

AOR 1975-48 Individual Contributions: Are contributions to a state party committee which are not earmarked considered contributions from the individual to a Federal candidate if that party committee contributes to that candidate? (September 3, 1975, FR p.40678)

AOR 1975-49 Reporting and Recordkeeping: What are the contribution allocation and recordkeeping requirements for the sale of tickets to events? (September 18, 1975, FR p.43166)

AOR 1975-50 Pre-Commission Rules: Are contributions received after December 31, 1974, but prior to the appointment of the Commission, subject to limitations of the Act?

Debts Are promissory notes incurred during 1974 but paid in 1975 subject to the new amendments of the Federal Election Campaign Act?

May a corporation make a cash settlement or write off a bad debt from a political committee without incurring a violation of 18 U.S.C. 610? (September 3, 1975, FR p.40678)

AOR 1975-51 Office Accounts: May excess campaign funds be used to purchase office equipment for a congressional office? (September 3, 1975, FR p.40678)

AOR 1975-52 Multi-candidate committee debts: May a state committee pay off 1974 debts of a candidate and not use its 1976 contribution limit? (September 3, 1975, FR p.40678)

AOR 1975-53 Expenditures: Are expenses which are incurred by an independent candidate during a petition drive to set his name on the ballot for the general election considered a primary or a general election expense? (September 3, 1975, FR p.40678)

AOR 1975-54 Election: Application of Utah's convention/primary system to the definition of an election. (September 3, 1975, FR p.40679)

AOR 1975-55 Excessive Honorariums: Do contributions to charities or to scholarship funds constitute an honorarium? (September 3, 1975, FR p.40679)

AOR 1975-56 Office Accounts: Are office account expenditures considered to be attributable to primary or general elections? (September 3, 1975, FR p.40679)

AOR 1975-57 Post-election Contributions: May post-election contributions be accepted? How long after the election may funds from testimonials, dinners, etc., be accepted? Is it permissible to use post-election contributions to repay loans from the candidate to his committee? (September 3, 1975, FR p.40679)

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AOR 1975-58 Office Accounts: May excess campaign funds be used to defray office expenses? May excess funds raised to pay off 1974 campaign debts be transferred to an office account to pay office expenses? (September 18, 1975, FR p.43166)

AOR 1975-59 Contributions: May corporations, if State law permits, donate to a fundraiser where a Federal candidate is the speaker but all proceeds are used for State and local candidates? (September 18, 1975, FR p.43166)

AOR 1975-60 Labor Union Sponsorship of a Fundraising Raffle: Is such activity legal? Can union volunteers contributing their time without pay during their regular time off promote and operate the raffle? Does the principal campaign committee report the contributions received from the raffle as a contribution from the union or as contributions from the individuals who purchased the raffle tickets whose names and addresses are on the raffle tickets? (September 18, 1975, FR p.43166)

AOR 1975-61 Allocation of Expenditures for Services of Individual to Dual Candidate: Is there a formula or accounting method to reflect properly campaign salary expenditures as to one individual (i.e. accountant) working for two campaigns? (September 18, 1975, FR p.43167)

AOR 1975-62 Contributions used to defray Fundraising costs: May a contributor give more than \$1000 if the excess of \$1000 is to defray actual costs of a dinner? (September 18, 1975, FR p.43167)

AOR 1975-63 Honorariums to Federal Officeholders appearing at Fundraiser Organization: Is such honorarium to be considered a political contribution even though event designed as a general organization fundraising event and not one for that particular officeholder? (September 18, 1975, FR p.43167)

AOR 1975-64 Solicitations for Fundraising event to retire 1972 campaign debt and 1973-74 deficit in office expense account: Can this be a single event? Does solicitation have to spell out dual purpose? (September 18, 1975, FR p.43167)

AOR 1975-65 Contribution from Immediate Family: What is definition of "immediate family"? (September 18, 1975, FR p.43167)

AOR 1975-66 Transfer of Funds: May funds be transferred from a state official's campaign committee to his Federal principal campaign committee? (September 22, 1975, FR p.43664)

AOR 1975-67 Campaign billboards: Must the names of the campaign committee chairman and treasurer be included on a candidate's billboard signs? (September 22, 1975, FR p.43664)

AOR 1975-68 Authorization of contributors: If a campaign committee has received contributions since January, 1975, must specific authorizations of the contributors be obtained to use the contributions to retire 1974 debts? (September 22, 1975, FR p.43664)

AOR 1975-69 Retired loan relationship to contribution limit: After a donor's loan to a political campaign committee has been repaid, is the amount of the original loan considered to be a contribution to the beneficiary candidate subject to the individual donor's \$1,000 limit? (September 22, 1975, FR p.43664)

AOR 1975-70 Union contributions: Should the cost incurred by a labor union in making phone calls to all its members in a Congressman's district be considered a reportable and attributable political contribution by the union's political action committee? (September 22, 1975, FR p.43664)

AOR 1975-71 Transfer of funds: If funds are raised by a committee to publish information about a Congressman's record, can any surplus funds later be transferred to that candidate's campaign committee? (September 22, 1975, FR p.43665)

AOR 1975-72 Application of Contribution and Spending Limits to Presidential Candidate's Travel for Party Purposes: Does the Federal Election Campaign Act of 1971, as amended, apply to a national political party's payment of expenses incurred by the President of the United States, the Vice President of the United States and their aides while engaged in national, state or local party promotional activities? (September 24, 1975, FR p.44041)

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AOR 1975-73 Constituent conferences: How should an incumbent Congressman report goods and services provided by companies and civic organizations to support an annual senior citizens conference sponsored by him in his district? (October 1, 1975, FR p.45293)

AOR 1975-74 Contribution in non-election years: Does an individual's contribution to a national political committee in a non-election year count toward his contribution limits in an election year? (October 1, 1975, FR p.45294)

AOR 1975-75 Contributions by incorporated organizations: Can an incorporated "legislative interest committee" contribute to the support of a federal candidate or to an unincorporated federal political action committee? (October 1, 1975, FR p.45294)

AOR 1975-76 Poll results provided to individual candidate: If a multi-candidate committee conducts an independent poll involving several candidates and then offers the results to one or more candidates, should the results be treated as in-kind contributions to the candidates who receive them? (October 1, 1975, FR p.45294)

AOR 1975-77 Royalties: Are royalties from the publication of a book by a Congressman subject to the limit placed on acceptance of honorarium? (October 1, 1975, FR p.45295)

AOR 1975-78 Fundraising costs: For the purposes of the expenditure limits, what specific expenses are to be considered fundraising costs? (October 1, 1975, FR p. 45295)

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