



THE FEDERAL ELECTION COMMISSION

RECORD

1325 K Street N.W., Washington, D.C. 20463

Volume 4, Number 2

February 1978

ADVISORY OPINIONS: SUMMARIES

The following are brief summaries of recently issued Advisory Opinions (AOs).

AO 1977-32: Trade Association Solicitations of Municipal Corporations

APTA-PAC is a political committee established by the American Public Transit Association (APTA), a trade association representing the urban transit industry. It must obtain specific solicitation approval from its municipal corporate members (as well as other corporate members) before soliciting those members' executive and administrative personnel. (Length, including 1 dissenting opinion: 5 pages)

AO 1977-43: Receiving Contributions After Termination Reports

The Glenn Brown for Congress Committee (the Committee) may not receive contributions or make expenditures after it has filed a valid Termination Report. The Committee may not be reactivated solely for the purpose of accepting a contribution designated to retire a 1976 election debt which the Committee previously owed to the candidate, but which the candidate subsequently forgave in order to permit the Committee to terminate. (Length, including 1 dissenting opinion: 3 pages)

AO 1977-56: Preserving Anonymity for Contributors to Separate Segregated Funds

The custodian of employees' contributions solicited (under the twice yearly provisions of 2 U.S.C. §441b) by SAFEPAC, the political action committee of the Western Company of North America, may also be the treasurer of SAFEPAC provided he/she preserves the anonymity of contributors and files the required reports. A custodian who serves as treasurer is subject to all the responsibilities of a treasurer under the Act and may not participate in the decision-making processing whereby the separate segregated fund makes contributions and expenditures.

The treasurer-custodian may not disclose to a company, accountant or an outside auditing firm the records of persons making a single contribution of \$50 or less or multiple contributions aggregating \$100 or less in a calendar year. The custodian-treasurer could, however, disclose to either a company accountant or outside auditing firm those records required with respect to single contributions exceeding \$50 in a calendar year or contributions from an individual which aggregate over \$100 in a calendar year. (Length: 2 pages)

AO 1977-59: Assistant Treasurer May Assume Treasurer's Duties

The treasurer of AICPA Effective Legislation Committee (the Committee) may designate an assistant treasurer to serve in his absence provided the Committee first files an amendment to its Statement of Organization identifying the assistant treasurer. In this case, the assistant treasurer may assume all the duties and responsibilities of the treasurer, including the duty to sign required reports. (Length: 2 pages)

REGISTRATION REMINDER

Any candidate in a 1978 election, regardless of their involvement in prior Federal elections, must file a Statement of Candidate (FEC Form 2) or letter containing the same information, designating (or redesignating) his/her principal campaign committee as the 1978 committee.

Political committees, including principal campaign committees and authorized committees, which supported one or more candidates in a 1976 election (and which have not terminated) must amend their Statements of Organization (FEC Form 1) if they plan to support candidates for a 1978 election. Amendments must indicate the change in election dates and any other new information, such as changes in address, officers, bank depositories, or office sought by the candidate(s). Amendments may be made by filing an amended Statement of Organization or by letter containing the same information.

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INDEX TO MULTICANDIDATE COMMITTEES

On January 19, 1978, the Federal Election Commission published in the Federal Register a notice on the availability of a comprehensive Index of Multicandidate Political Committees. A "multicandidate committee" is defined under the Act as a committee registered for at least six months, which has received contributions from more than 50 persons and, except in the case of State party organizations, has made contributions to five or more candidates for Federal office. A multicandidate committee is permitted to contribute up to \$5,000 to each Federal candidate, per election. Contributions made by any political committee affiliated with a multicandidate committee count against that multicandidate committee's \$5,000 limit.

The Multicandidate Committee Index contains two sections: party-related committees and nonparty-related committees. It is based on a review of the reports and statements filed with the Commission, the General Accounting Office, the Clerk of the House and the Secretary of the Senate since April 7, 1972. Committees which have met the qualifications for "multicandidate committee" prior to January 1, 1975, were determined to have been qualified as of January 1, 1975, the effective date of the 1974 Amendments to the Federal Election Campaign Act.

The Index, as required under the Act, includes each committee's date of registration and the date it qualified as a multicandidate committee, either on its own or through affiliation with another qualified multicandidate committee. The index may be used to verify the contributing committee's status as a "multicandidate committee" qualified to give up to \$5,000.

Updates of the Index will be published on a monthly basis during the 1978 election year. Copies of the Index are available, upon written request, from the Commission's Office of Public Records for \$1.00 per copy, paid in

FEC PUBLIC APPEARANCES

In keeping with its objective of making information available to the public, the Federal Election Commission regularly accepts invitations for its representatives to address public gatherings on the subject of campaign finance laws and the Commission itself. (For a summary of the Commission's policy on accepting invitations, see the Record, June 1977, p. 6.) This regular column will list scheduled Commission appearances, detailing the name of the sponsoring organization, location of the event and the Commission's representative. Any inquiries concerning the event should be addressed to the sponsoring organization.

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