



THE FEDERAL ELECTION COMMISSION

RECORD

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COMPLIANCE

COMMISSION REVISES NONFILER PROCEDURES

On January 21, 1982, the Commission approved revisions to a policy adopted in July 1980 for notifying authorized and unauthorized committees of their reporting obligations under the Act.* (See page 9 of the August 1980 Record.) Under the revised policy, the Commission will notify the authorized committees of those candidates that fail to file pre-election and quarterly reports due just before the election in which the candidate is running. 2 U.S.C. §437g(b). The notice will inform them that their reports have not been received. Under the former policy, the Commission had notified all categories of filers failing to file any report.

Although unauthorized committees and some authorized committees will no longer receive notices, they will continue to be fully liable for failure to file any report required under the Act. (See the reporting requirements of 2 U.S.C. §434.) Moreover, the Commission will continue to send prior notices to all political committees, informing them of upcoming reporting obligations in both election and nonelection years. Authorized candidate committees will also receive prior notices informing them of their primary election reporting obligations.

*The policy adopted in 1980 reflected the 1979 amendments to the federal election law. The Commission originally adopted nonfiler procedures in 1978.

PUBLIC APPEARANCES

Date	Sponsoring Organization
3/5	Hope College Washington Honors Seminar Washington, D.C. Commissioner Joan D. Aikens
3/5	American Bar Association Conference on the FEC Washington, D.C. Frank P. Reiche, Chairman Charles N. Steele, General Counsel
3/19	National Conference of State Legislatures Nashville, Tennessee Charles N. Steele, General Counsel



SUPREME COURT DIVIDED IN FEC v. AMERICANS FOR CHANGE

On January 19, 1982, the Supreme Court, in a 4 to 4 split vote, left standing an earlier decision by the U.S. District Court for the District of Columbia in the consolidated cases of FEC v. Americans for Change and Common Cause v. Harrison Schmitt (U.S. Supreme Court Nos. 80-1067 and 80-847).

Section 9012(f) of the Presidential Election Campaign Fund Act permits unauthorized political committees to make expenditures of up to \$1,000 to further the election of a publicly funded Presidential candidate. The FEC had asked the district court to uphold the constitutionality of Section 9012(f)'s expenditure limit as applied to Ameri-

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cans for Change, Americans for an Effective Presidency and Fund for a Conservative Majority, three multicandidate political committees that had planned to spend large sums in support of the Republican Presidential candidate's general election campaign.

In its opinion of September 30, 1980, a three-judge panel of the district court concluded, however, that the defendants' proposed expenditures constituted "independent expenditures" which could not be limited. (For a detailed summary of the suit, see page 8 of the April 1981 Record.)

REPORTS

CORRECTION

The Monthly Reports chart on page 4 of the February Record contained incorrect dates for the periods covered by the pre-election and post-election reports. The correct chart appears below.

Monthly Reports

Month	Period Covered	Filing Date
February	1/1 - 1/31	February 20
March	2/1 - 2/28	March 20
April	3/1 - 3/31	April 20
May	4/1 - 4/30	May 20
June	5/1 - 5/31	June 20
July	6/1 - 6/30	July 20
August	7/1 - 7/31	August 20
September	8/1 - 8/31	September 20
October	9/1 - 9/30	October 20
Pre-Election	10/1 - 10/13	October 21
Post-Election	10/14 - 11/22	December 2
Year-End	11/23 - 12/31	January 31, 1983

OPINIONS

ADVISORY OPINION REQUESTS

The following chart lists recent AORs. The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR	Subject
1982-2	Trade association's partisan communications to members. (Date made public: January 22, 1982; Length: 9 pages)
1982-3	Committee formed on behalf of senator to "test the waters" for possible Presidential campaign. (Date made public: January 27, 1982; Length: 6 pages)
1982-4	Costs of renovating campaign headquarters deducted from rent; reporting. (Date made public: February 3, 1982; Length: 2 pages)
1982-5	Financing nonfederal expenses of national party conference. (Date made public: February 10, 1982; Length: 8 pages)
1982-6	Financing noncampaign, public interest committee formed by Congressman. (Date made public: February 12, 1982; Length: 1 page)
1982-7	Company's computerized recordkeeping and reporting service for separate segregated funds. (Date made public: February 16, 1982; Length: 2 pages, plus supplement)
1982-8	Receipt and disbursement of "credit units" by PAC established in commercial barter industry. (Date made public: February 17, 1982; Length: 3 pages, plus supplement)

The Record is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: Frank P. Reiche, Chairman; Danny Lee McDonald, Vice Chairman; Joan D. Aikens; Lee Ann Elliott; Thomas E. Harris; John Warren McGarry; William F. Hildenbrand, Secretary of the Senate, Ex Officio; Edmund L. Henshaw, Jr., Clerk of the House of Representatives, Ex Officio. For more information, call 202/523-4068 or toll-free 800/424-9530.

ADVISORY OPINIONS: SUMMARIES

An Advisory Opinion (AO) issued by the Commission provides guidance with regard to the specific situation described in the AOR. Any qualified person who has requested an AO and acts in accordance with the opinion will not be subject to any sanctions under the Act. Other persons may rely on the opinion if they are involved in a specific activity which is indistinguishable in all material aspects from the activity discussed in the AO. Those seeking guidance for their own activity, however, should consult the full text of an AO and not rely only on the summary given here.

AO 1981-49: Contributions and Expenditures in State and Local Elections by Holding Company

Great Western Financial Corporation (GWFC), the parent holding company of Great Western Savings, a federally chartered savings and loan association located in California, may make contributions and expenditures on behalf of candidates for state and local office in California. (California law permits corporate and labor contributions in state and local elections.) GWFC may not, however, use any revenues derived from Great Western Savings' assets when it makes such state and local contributions or expenditures.

Although 2 U.S.C. §441b prohibits Great Western Savings, as a federally chartered corporation, from making contributions and expenditures in connection with "any election to any political office," this ban does not extend to the holding company since GWFC is not a federally chartered corporation. Section 441b does, however, prohibit GWFC, a corporation, from making contributions and expenditures in connection with federal elections. (Date issued: January 29, 1982; Length: 3 pages)

AO 1981-51: Volunteer Services Offered by Foreign Artist to Candidate Committee

An artist who is a foreign national may not donate volunteer services to the Metzenbaum for Senate Committee (the Committee) in order to create original artworks for the Committee. The Committee had planned to reproduce a limited edition of the artworks as fundraising items. It had also planned to absorb all production costs. Section 441e of the Act, however, expressly prohibits foreign nationals from donating "any contribution of money or other thing of value" in connection with any election to any political office. Commissioner Thomas E. Harris filed a dissenting opinion. (Date issued: January 29, 1982; Length: 3 pages, including dissenting opinion)

AO 1981-52: Trade Association's Solicitation of its Unincorporated Members

The National Association of Real Estate Investment Trusts, Inc. (NAREIT), a trade association, may solicit contributions to its separate segregated fund (NAREIT-PAC) from member Real Estate Investment Trusts (REITs) that operate as unincorporated business trusts or associations under their respective state laws. Contributions from unincorporated member REITs are attributable to both the REIT and each person who has a beneficial ownership interest in the REIT.

The solicitation is permissible because NAREIT's unincorporated members are materially indistinguishable from other types of unincorporated members (e.g., partnerships and sole proprietorships) that, under the Act, may be solicited by a trade association. 2 U.S.C. §441b(b)(4)(C); 11 CFR 114.7(e).

In making a contribution to NAREIT-PAC, an unincorporated REIT may attribute the contribution to each REIT investor in direct proportion to his/her interest in the REIT, or it may use an alternative plan agreed on by the investors. 11 CFR 110.1(e). No portion of the REIT's contribution may, however, be attributed to an investor who would be prohibited from making a direct contribution to NAREIT-PAC, i.e., a corporation, labor organization, national bank, government contractor or foreign national. 2 U.S.C. §§441b, 441c and 441e. (Date issued: January 25, 1982; Length: 4 pages)

AO 1981-55: PAC Solicitation of Members of Organization Affiliated with Parent

The American Medical Association Political Action Committee (AMPAC), the separate segregated fund of the American Medical Association (the AMA), may solicit contributions from the members of the American Medical Association Auxiliary, Inc. (the Auxiliary), a nonprofit organization whose membership is limited to spouses of members of the AMA and of the AMA's state affiliates. (See 11 CFR 114.5, 114.7 and 114.1(e).)

AMPAC may solicit Auxiliary members and their families because the Auxiliary is affiliated with AMPAC's parent organization, the AMA. 11 CFR 114.1(e) and 114.8(g). This affiliation is evidenced by the AMA's continuing control and direction over the Auxiliary's policies and practices. For example, the AMA governs the Auxiliary's entire legislative program. 11 CFR 110.3(a)(1)(iii). (Date issued: January 25, 1982; Length: 4 pages)

continued

AO 1981-57: Earmarking Contributions Through Payroll Deduction Plan Conducted by Union PAC

The Coal Miners Political Action Committee (COMPAC), the separate segregated fund of the United Mine Workers of America (UMWA), may implement a payroll deduction plan that would allow UMWA members to earmark contributions for candidates and political committees. COMPAC would then forward the contributions to the recipients designated by members. 2 U.S.C. §§441a(a)(8) and 441b(b)(5); 11 CFR 110.6 and 114.5(1). The contributions earmarked for candidates would not count against COMPAC's own contribution limits, as long as neither UMWA nor COMPAC exercised any control or direction over the members' selection of candidate recipients. This would mean that UMWA and COMPAC would be bound by a member's selection of recipients and would not limit the selection to a particular candidate or group of candidates; and that a member could revoke his/her designation at any time.

The Commission expressly conditioned its approval of the plan on COMPAC's obligation to report contributions earmarked for candidates to the Commission and to the intended recipients, according to the procedures spelled out in Commission Regulations at 11 CFR 102.8 and 110.6. COMPAC would have to report contributions earmarked for **political committees** according to the procedures of 11 CFR 102.8, 104.3(a)(2)(viii) and 104.3(a)(4)(vi). (Date issued: January 27, 1982; Length: 4 pages)

AO 1981-58: Campaign Funds Used For Litigation Involving Congressional Reapportionment

Congressman Don Edwards (D-CA) may use campaign funds to pay legal fees incurred as a result of litigation concerning the issue of Congressional reapportionment in California. Under the Act, candidates and their principal campaign committees have wide discretion in the use of campaign funds, provided the funds are used for lawful purposes.

Litigation related to reapportionment is not considered an election-influencing activity subject to the Act's requirements. Nevertheless, payments from Mr. Edwards' campaign funds to cover litigation fees must be reported as disbursements (rather than expenditures) because, under 2 U.S.C. §434(b) and 11 CFR 104.3(b)(4)(vi), political committees must report all their disbursements.

The Commission expressed no opinion on the application of tax laws or House rules to the litigation payments since they are beyond its jurisdiction. (Date issued: January 25, 1982; Length: 2 pages)

AO 1981-59: Procedures for Transferring Proceeds of Joint Fundraisers by State/Federal PACs

The National Association of Realtors (NAR), a trade association, may use either one of two procedures proposed by NAR (and modified by the Commission) to divide and transfer proceeds raised through joint fundraisers conducted by NAR's separate segregated fund, the Realtors PAC (RPAC), together with each of the State PACs connected respectively with NAR's state affiliates. The two procedures (described below) would allow RPAC to receive at least 40 percent of the joint fundraising proceeds while giving RPAC the option to receive additional proceeds transferred from the State PACs. The additional transfers would not cause the State PACs to become political committees under the Act.

Under the first procedure, RPAC would deposit all joint fundraising proceeds in its account and report the entire amount as contributions. RPAC would notify each contributor that it had charged his/her contribution against the contributor's \$5,000 limit for RPAC. RPAC would then transfer an agreed upon portion of the total contributions to the State PAC.

The second procedure would allow RPAC and a State PAC to use an escrow account for the fundraising proceeds. The original solicitation notice would have to:

1. Notify contributors that at least, and possibly more than, 40 percent of each contribution would be forwarded to RPAC and charged against the contributor's limit for RPAC; and
2. Identify which issue of the state affiliate's magazine would provide information concerning the final allocation of contributions between RPAC and the State PAC.

If, subsequent to the fundraiser, RPAC and the State PAC decided to transfer to RPAC more than the 40 percent of the proceeds originally agreed upon, RPAC would be responsible for informing contributors of the reallocation of their contributions. Acting as an agent of RPAC, the State PAC could, however, discharge this duty. Additionally, RPAC would have to monitor individual contributions. If it found that the additional transfers caused a contributor to exceed his/her contribution limit for RPAC, RPAC would have to exclude the excessive amount by either readjusting the formula for allocating the proceeds or refunding the amount in excess of \$5,000 to the State PAC.

Under either procedure, the transmittal and reporting of proceeds would be subject to FEC regulations. 11 CFR Parts 102, 103 and 104.

The Commission cautioned that this opinion concerned future transfers of fundraising proceeds to

RPAC--not transfers of funds currently deposited in State PAC accounts. (Date issued: February 5, 1982; Length: 5 pages)

AO 1981-61: Holding Company's Contributions to State Party Committee

Since it is a corporation chartered under state law, Commercial Bankstock, Inc., a one-bank holding company, may make contributions to the Arkansas Democratic Party. Its wholly owned subsidiary, Commercial National Bank, may not, however, make contributions or expenditures in connection with any election to any political office. 2 U.S.C. §441b(a). The holding Company's contributions are permissible as long as:

1. They do not include funds derived from the operations of National Commercial Bank; and
2. They are not used in connection with any federal election. 2 U.S.C. §441b.

The Commission did not express an opinion on applicable state laws. (Date issued: February 5, 1982; Length: 2 pages)

AO 1982-1: Funds Transferred From 1982 House Campaign to Newly Registered 1982 Senate Campaign

If Congressman James J. Florio should decide to terminate his current 1982 House campaign, he may transfer all the funds of his 1982 House Committee to his authorized committee for a 1982 Senate campaign (the Senate Committee), provided the following conditions are met:

1. Congressman Florio is not actively seeking nomination or election to both the Senate and the House.
2. The Senate Committee ensures that funds transferred do not cause a donor to exceed the donor's limit for the Senate Committee (i.e., \$5,000 for a multicandidate committee and \$1,000 for any other person, including an individual, partnership or other political committee). 11 CFR 110.3(a)(2)(v) and 110.1(f). The treasurer may do this by reviewing the transferred funds on a "last in, first transferred" basis, beginning with the last contributions received by the House Committee and working back until the amount transferred is reached. Should the review indicate that a contribution made to the House Committee will cause a donor to exceed the donor's limit for the Senate Committee when added to contributions made by the same donor to the Senate Committee, the amount in excess of the limit must be excluded from the transfer. 2 U.S.C. §441a; 11 CFR 110.3(a)(2)(v)(B).

The House Committee should file a termination report with the Clerk of the House once it has liquidated all its debts. 11 CFR 102.3(b). The termination report should refer to the impending

transfer of funds to the Senate Committee as a "transfer out." 11 CFR 102.3(b) and 110.1(f). In addition, the Senate Committee should report funds received from the House Committee as contributions from the original contributors. (Date issued: February 5, 1982; Length: 3 pages)



FEC RELEASES FINAL REPORT ON 1980 PRESIDENTIAL PRIMARY ACTIVITY

Sixteen Presidential contenders raised \$108.6 million and spent \$106.5 million in seeking their parties' 1980 nominations, according to a comprehensive report released by the FEC on November 15, 1981. These figures have been adjusted to reflect loan repayments, contribution refunds and rebates and transfers to affiliated committees. Of the 16 candidates, 10 received primary matching funds to help finance their primary campaigns.

The statistical study, 1979-80 FEC Report on Financial Activity for Presidential Pre-Nomination Campaigns, covers the period from January 1, 1979, through December 31, 1980. (Information on two campaigns active during 1978 is also included.) The study focuses exclusively on money raised and spent by the 16 candidates in their primary campaigns; no general election information is provided. The candidates, all of whose financial activity exceeded \$100,000, included four Democrats, nine Republicans, two Libertarians and one Socialist Workers Party candidate.

The study shows that 67.7 percent of the money raised by the 16 candidates came from individuals. Contributions from nonparty (noncandidate) committees represented only 1.4 percent of total funds raised. Of the 10 campaigns receiving primary matching funds, individual contributions represented 64.8 percent of all money raised; non-party committee contributions accounted for only 1.4 percent of funds raised and primary matching funds made up 32.8 percent of the funds they received.

Chart I on page 6 compares the funding of the 10 primary matching fund recipients active in 1979-80 with that of the 15 primary matching fund recipients active in 1975-76. In comparing the two election cycles, the difference in the number of campaigns, plus inflation, should be taken into consideration.

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In addition to money spent by the candidates, \$2.2 million was spent independently by persons and political committees to promote the election of these candidates; just over \$.5 million was spent independently to advocate their defeat.

Corporations and membership organizations reported spending \$.6 million to make partisan communications to solicitable individuals in support of Presidential primary candidates and \$.2 million to oppose them. Approximately \$.5 million was spent to promote the nomination of undeclared Presidential candidates (i.e., draft activities).

Chart II below presents an overview of each Presidential candidate's financial activity during the 1979-80 election cycle. The first 10 candidates listed were matching fund recipients. The matching fund figures represent total matching funds reported by the candidates' campaigns through December 31, 1980. The Commission certified additional funds to Carter, Crane and Kennedy in 1981, bringing total matching funds certified to \$31.3 billion.

The 1979-80 FEC Report on Financial Activity for Presidential Pre-Nomination Campaigns contains numerous tables on the financial activity of the

16 candidates. Copies are available for \$1.00 each from the FEC Public Records Office, 1325 K Street, N.W., Washington, D.C. 20463.

**CHART I
ACTIVITY OF 1976 and 1980
PRESIDENTIAL CAMPAIGNS
RECEIVING MATCHING FUNDS**

	Presidential Primary Campaigns	
	1976	1980
Number of Candidates	15	10
Adjusted Receipts	\$67.9*	\$94.2
Individual Contributions	42.5	61.0
Nonparty Contributions	.8	1.4
Federal Matching Funds	24.3	30.9
Adjusted Disbursements	66.9	92.3

*Figures are in millions of dollars.

**CHART II
OVERVIEW OF 1979-1980 PRESIDENTIAL PRIMARY ACTIVITY**

	Adjusted Receipts	Individual Contributions	Nonparty Committee Contributions	Matching Funds	Adjusted Disbursements
Brown(D)	\$ 2.65*	\$ 1.71	\$.04	\$.89	\$ 2.65
Carter(D)	18.55	12.93	.46	5.05	18.52
Kennedy(D)	12.29	7.75	.23	3.86	12.27
LaRouche(D)	2.14	1.55	.008	.53	2.15
Anderson(R)	6.63	3.91	.02	2.68	6.52
Baker(R)	7.14	4.20	.13	2.64	7.07
Bush(R)	16.71	10.87	.13	5.72	16.71
Crane(R)	5.24	3.47	.002	1.75	5.22
Dole(R)	1.43	.90	.045	.45	1.39
Reagan(R)	21.39	13.76	.285	7.29	19.82
SUBTOTAL	\$ 94.17	\$61.05	\$1.35	\$30.86	\$ 92.32
Connally(R)	\$ 12.72	\$11.64	\$.205	\$ 0	\$ 12.62
Fernandez(R)	.25	.19	.002	0	.25
Strassen(R)	.11	.006	0	0	.12
Clark(L)**	1.09	.57	0	0	1.02
Hunscher(L)	.15	.01	0	0	.10
Pulley(SWP)***	.13	.10	0	0	.12
GRAND TOTAL	\$108.62	\$73.57	\$1.56	\$30.86	\$106.55

*Figures are in millions of dollars.

**Libertarian Party

***Socialist Workers Party

FEC REPORTS ON INDEPENDENT SPENDING FOR PRESIDENTIAL ELECTION YEAR

Independent expenditures made during the 1979-80 election cycle by nonparty (noncandidate) committees, individuals and other groups topped \$16 million, according to a study released by the Federal Election Commission on November 29, 1981. Thirty-three individuals spent a total of \$1.2 million in independent expenditures; 105 non-party committees spent \$14.1 million; and 80 other groups spent \$.7 million. Under the federal election law, individuals or groups may spend unlimited funds advocating the election or defeat of federal candidates as long as these expenditures are made independently, i.e., without cooperation or consultation with the candidate or his/her campaign. (See 2 U.S.C. §431(17) and 11 CFR 100.16 and 109.1(a).)

Out of the \$16 million total, \$13.7 million was spent to influence the outcome of Presidential elections in 1980. (This contrasts with \$1.6 million spent in independent expenditures during the 1976 Presidential elections.) Independent expenditures made on behalf of Ronald Reagan accounted for 89 percent of the total spent to influence Presidential elections. Only one-fifth of the Presidential expenditures (\$2.7 million) were made during the primary season; the rest of the independent expenditures were made during the general election period.

Independent expenditures for and against House candidates totaled \$684,727. Spending to influence Senate races totaled \$1.7 million. By contrast, independent expenditures on behalf of Congressional candidates in the 1976 elections amounted to approximately \$400,000, split almost evenly between House and Senate races.

The study shows that \$2.2 million was spent advocating the defeat of 65 candidates. This negative spending represented only 14 percent of the total spent. However, in the case of Senate campaigns, negative spending amounted to 78 percent of the independent expenditures made.

Chart I below lists the candidates for or against whom the most money was spent. Chart II and Chart III (page 8) list those individuals and political committees who made the largest independent expenditures during 1979-80.

The 1979-80 FEC Index of Independent Expenditures is available for \$5 from the Commission's Public Records Office, 1325 K Street, N. W., Washington, D.C. 20463.

**CHART I
CANDIDATES FOR OR AGAINST WHOM
INDEPENDENT EXPENDITURES WERE MADE**

Candidate	Expenditures Advocating Election	Expenditures Advocating Defeat
Presidential		
Ronald Reagan(R)	\$12,246,057	\$ 47,868
Edward Kennedy(D)	77,189	491,161
Jimmy Carter(D)	45,869	245,611
John Connally(R)	288,032	-
John Anderson(I)	199,438	2,635
Senate		
Frank Church(D-ID)	\$ 1,945	\$ 339,018
John Culver(D-IA)	59,584	186,613
George McGovern (D-SD)	3,553	222,044
Alan Cranston(D-CA)	2,285	192,039
Birch Bayh(D-IN)	1,027	180,723
Thomas Eagleton (D-MO)	22,910	101,794
House		
Robert Edgar (D-PA)	\$ 39,182	\$ 30
Jack Fields(R-TX)	38,376	-
Carey Peck(D-CA)	37,734	-
Harold Sawyer (R-MI)	14,219	13,912
Charles Grassley (R-IA)	27,799	-
Harold Volkmer (D-MO)	26,917	-
Robert Drinan (D-MA)	-	23,147
W.J. "Billy" Tauzin (D-LA)	22,535	-

**CHART II
INDEPENDENT EXPENDITURES
BY INDIVIDUALS**

Individual	Amount Spent
Cecil R. Haden	\$599,333
Stewart Rawlings Mott	110,179
Norman Lear	108,301
Richard M. DeVos	70,575
Jay Van Andel	68,433
Theo N. Law	66,230
David M. Melville	35,159
Henry C. Grover	29,076
Michael Rosen	25,940
Dwight G. Vedder	20,000

continued

**CHART III
INDEPENDENT EXPENDITURES BY
POLITICAL COMMITTEES**

Political Committee	Amount Spent
Congressional Club	\$4,601,069
National Conservative Political Action Committee	3,307,962
Fund for a Conservative Majority	2,062,456
Americans for an Effective Presidency	1,270,208
Americans for Change	711,856
NRA Political Victory Fund	441,891
Christian Voice Moral Government Fund	406,199
1980 Republican Presidential Campaign Committee	314,740
American Medical Political Committee	172,397
Gun Owners of America Campaign Committee	119,891

AUDITS

AUDITS RELEASED TO THE PUBLIC

The following is a chronological listing of audits released by the Commission between January 20 and February 10, 1982. Final audit reports are available to the general public through the Office of Public Records.

1. League of Conservation Voters (Final Audit Report released January 27, 1982)
2. Carter/Mondale Re-Election Committee, Inc. (Addendum to the Final Audit Report released February 10, 1982)

INFORMATION

MICROFILMED AGENDA ITEMS AVAILABLE

During January 1982, the Commission announced the availability of microfilm cartridges containing all agenda items discussed in open sessions from 1975 through 1980. There is a cartridge for each year, with all sessions arranged chronologically. Individual agenda items may be located with the help of a computerized subject index.

The microfilmed documents are available for review and copying in the FEC's Public Records Office. For further information, call 523-4181 or toll free 800/424-9530.

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