

RECORD

INFORMATION

PARTY COORDINATED EXPENDITURE LIMITS -- 1986

Party committees may make limited, special expenditures on behalf of their candidates in the 1986 general elections. 2 U.S.C. §441a(d); 11 CFR 110.7. These special expenditures count neither as contributions to the candidate nor as expenditures by the candidate or the candidate's authorized committees. The party committee may coordinate the expenditures with the candidate's campaign, but the party committee--not the candidate--must report them, using Schedule F of FEC Form 3X.

In 1986, national party committees have separate spending limits for Senate and House candidates in the general election. State party committees are subject to separate spending limits for Senate and House general election candidates in their respective states. Within a state, all expenditures made on behalf of one candidate by the state party committee or any subordinate party committee (e.g., county, district, local) are subject to **one** spending limit.

The formulas for the party spending limits in 1986 are based on state voting age population estimates (as of July 1, 1985) from the Department of Commerce, and the increase in the consumer price index (CPI) certified by the Secretary of Labor. They are calculated as follows:

How to Calculate Senate Limit

The Senate formula is the state voting age population (VAP) x \$.02, increased according to the change in the consumer price index; or \$20,000 (increased by the change in the CPI), whichever is greater. (See chart below.)

How to Calculate House Limit

The House limit depends on the number of districts in the state. For House candidates in states with more than one district (and candidates for Delegate from the District of Columbia, Guam and the Virgin Islands or for Resident Commissioner from Puerto Rico), the limit is \$10,000 (increased by the change in the CPI) or \$21,810 during 1986. For House candidates in states entitled to only one representative, the limit is the same as that for Senate candidates. (See above.)

Chart on Senate Limits

The Commission has compiled the following chart for 1986 limits on party spending for Senate candidates in the general election. The Senate limit also applies to candidates for the House, in those states which have a single Representative. In the chart, an asterisk (*) indicates those states having only one Representative. VAP figures in the chart are in thousands.

State	VAP (Thousands)	1986 Party Spending Limits
Alabama	2,904	\$126,672.48
Alaska*	351	43,620.00
Arizona	2,312	100,849.44
Arkansas	1,713	74,721.06
California	19,525	851,680.50
Colorado	2,367	103,248.54
Connecticut	2,418	105,473.16
Delaware*	465	43,620.00
Florida	8,830	385,164.60
Georgia	4,318	188,351.16

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11 MINI CONFERENCE FOR CANDIDATES

State	VAP (Thousands)	1984 ⁶ Party Spending Limits
Hawaii	764	\$ 43,620.00
Idaho	681	43,620.00
Illinois	8,436	367,978.32
Indiana	3,993	174,174.66
Iowa	2,111	92,081.82
Kansas	1,785	77,861.70
Kentucky	2,703	117,904.86
Louisiana	3,126	136,356.12
Maine	860	43,620.00
Maryland	3,295	143,727.90
Massachusetts	4,458	194,457.96
Michigan	6,605	288,110.10
Minnesota	3,054	133,215.48
Mississippi	1,824	79,562.88
Missouri	3,702	161,481.24
Montana	592	43,620.00
Nebraska	1,158	50,511.96
Nevada	716	43,620.00
New Hampshire	745	43,620.00
New Jersey	5,700	248,634.00
New Mexico	1,002	43,707.24
New York	13,414	585,118.68
North Carolina	4,666	203,530.92
North Dakota*	488	43,620.00
Ohio	7,871	343,333.02
Oklahoma	2,377	103,684.74
Oregon	1,976	86,193.12
Pennsylvania	8,976	391,533.12
Rhode Island	743	43,620.00
South Carolina	2,425	105,778.50
South Dakota*	502	43,620.00
Tennessee	3,531	154,022.22
Texas	11,572	504,770.64
Utah	1,031	44,972.22
Vermont*	395	43,620.00
Virginia	4,262	185,908.44
Washington	3,229	140,848.98
West Virginia	1,420	61,940.40
Wisconsin	3,491	152,277.42
Wyoming*	349	43,620.00

Delegate/Resident Commissioner Candidates

America Samoa	19	\$ 21,810.00
District of Columbia	494	21,810.00
Guam	72	21,810.00
Puerto Rico	2,034	21,810.00
Virgin Islands	62	21,810.00

EASY ACCESS TO FEC

The FEC encourages the public to visit the agency's new headquarters and take advantage of the Commission's information services. Located at 999 E Street, N.W., the agency is within two blocks of both metrorail and metrobus lines. (See the map on the next page.)

Depending on your needs and interests, one or more FEC offices can offer you assistance and information, as discussed below. The FEC is open from 9 to 5, daily. These offices may also be contacted by calling the FEC's toll-free number, 800/424-9530, or by calling the local numbers listed below.

If you represent a committee and want to file your report in person, come to the **Mail Room**, located on the street floor.

If you work for a committee or a candidate (e.g., as a treasurer, a volunteer or an attorney) and want assistance in complying with the law or wish to pick up free written materials explaining the law's requirements, stop by the **Information Services Division** on the 2nd floor. A public affairs specialist will meet with you and answer your questions. The specialists may be contacted by phone at 376-3120.

If you work with a committee and have specific questions about filling out your report, you can speak with the reports analyst who reviews your committee's report. Come to the **Reports Analysis Division** on the 7th floor or call 376-2480.

If you are interested in gathering data on specific candidates or committees, you will find the information in the **Public Records Office**. Located on the street floor, the Public Records Office provides information on the campaign finance activities of political committees and candidates involved in federal elections. The office is a library facility with ample work space and a knowledgeable staff to help locate documents. FEC documents available for review and copying include:

- o Campaign finance reports (1972-present);
- o Statistical summaries of campaign finance reports;
- o Computer indexes on campaign finance information;
- o Advisory opinion requests and advisory opinions;
- o Completed compliance cases;
- o Audit reports;
- o Press releases; and
- o Other Commission documents (e.g., agendas of FEC meetings).

The office may also be contacted locally by calling 376-3140.

If you are a media representative—print or broadcast—you will want to meet with our press officers in the **Press Office**, also located on the street floor. They will answer your questions and help provide data on specific candidates and com-

mittees. The Press Office may be contacted by phone at 376-3155.

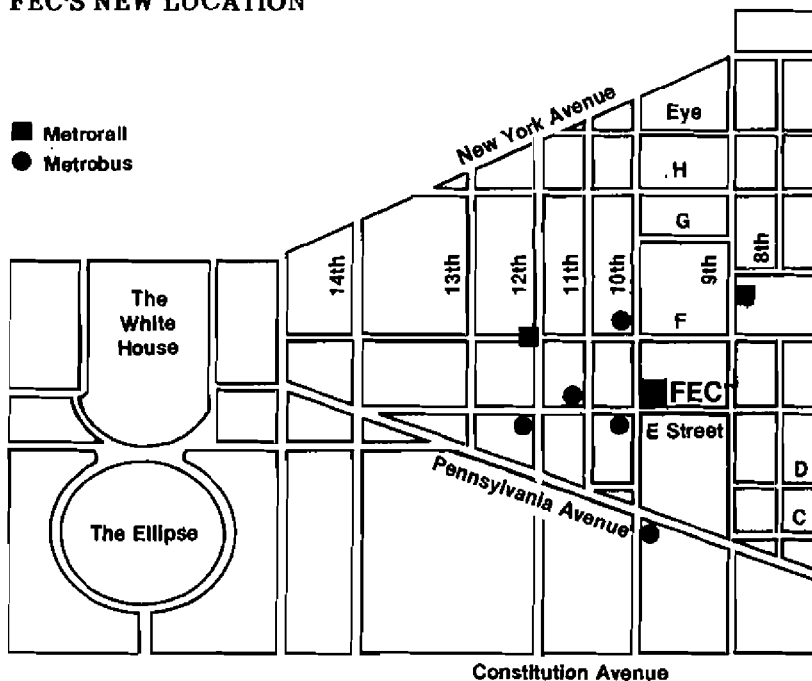
If you are interested in seeking information through the Freedom of Information Act, address your request to the **Press Office**.

If you want to do research related to the election law or campaign finance reform, you may wish to use the **Library** located on the 8th floor. It houses a collection which includes basic legal research tools and materials dealing with political

campaign finance, corporate and labor political activity and campaign finance reform. Researchers may call the Library at 376-5312.

If your interest lies in election administration, the **National Clearinghouse on Election Administration** can answer your questions and provide current research findings. The office is located on the 7th floor. The Clearinghouse may also be contacted by calling 376-5670.

FEC'S NEW LOCATION



REPORTS

APRIL REPORTING SCHEDULE

The following chart and paragraphs explain the reporting schedule for the various categories of filers.

Type of Filer	Report			
	Quarterly April 15	Pre-Primary	Monthly April 20	Semiannual July 31
Congressional Candidate Committees: 1986	X	X		
Congressional Candidate Committees: Other Years				X
Presidential Candidate Committees: Monthly Filers ^{1/}			X	
Presidential Candidate Committees: Quarterly Filers	X			
PAC/Party Committees: Monthly Filers ^{2/}			X	
PAC/Party Committees: Quarterly Filers	X	X ^{3/}		
Connected Organizations: Communications ^{4/}	X			

^{1/}All Presidential committees are required to file on either a monthly or a quarterly basis during 1986. 11 CFR 104.5(b)(2).

^{2/}All corporate and labor PACs, nonconnected committees and party committees are required to file on either a monthly or a quarterly basis in 1986.

^{3/}Required only if the committee makes contributions or expenditures on behalf of candidates in the primary which have not been previously disclosed.

^{4/}Report required if aggregate costs for partisan, internal communications for all 1986 primaries have exceeded \$2,000.

Quarterly Report

Due by April 15, the report should cover all activity from January 1 (or from the closing date of the last report filed in 1986) through March 31.

Pre-Primary Report

The report is due 12 days before the primary election and must be complete as of the 20th day before the election. If sent by registered or certified mail, the report must be postmarked no later than the 15th day before the election.

Monthly Report

The monthly report must be filed by April 20. It should cover all activity from March 1 (or from the closing date of the last report filed in 1986) through March 31.

Semiannual Report

The semiannual report is not filed until July 31. It covers all activity from January 1 through June 30.

Change in Filing Frequency

PACs and party committees which plan to change their reporting schedule (e.g., from quarterly to monthly) must notify the Commission of their intention. The committee may notify the Commission by submitting a letter with the next report due under its current reporting schedule. A committee may not change its filing frequency more than once a year. 11 CFR 104.5(c). The FEC requests that Presidential committees also inform the Commission in writing if they decide to change their reporting schedule.

WHERE REPORTS ARE FILED

Committees must file all reports and statements simultaneously with the appropriate federal and state officials. 11 CFR 108.5.

Filing with the Federal Government

o The principal campaign committees of House candidates and committees supporting or opposing only House candidates file with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. 11 CFR 104.4(c)(3) and 105.1.

- o The principal campaign committees of Senate candidates and committees supporting or opposing only Senate candidates file with the Secretary of the Senate, Senate Public Records, Hart Senate Office Building, Room 232, N.E., Washington, D.C. 20510. 11 CFR 104.4(c)(2) and 105.2.
- o All other committees, including the principal campaign committees of Presidential candidates, file with the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. 11 CFR 105.3 and 105.4.

Filing with State Governments

- o The principal campaign committees of Congressional candidates must file a copy of every report and statement with the Secretary of State or the appropriate elections official of the state in which the candidate seeks federal office. 11 CFR 108.3.
- o PACs and party committees making contributions or expenditures in connection with House and Senate races file in the state in which the candidate seeks election. The law requires a copy only of that portion of the report applicable to the candidate(s) being supported. Committees supporting Presidential candidates must file in the state(s) in which the Presidential committee and donor committee have their respective headquarters.

HOW TO OBTAIN MORE INFORMATION

During 1985, reporting forms and additional information will be sent to registered committees. Questions and requests for additional forms should be addressed to the Information Services Division, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463; or call 202/376-3120 or toll free 800/424-9530.

The Record is published by the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. Commissioners are: Joan D. Aikens, Chairman; John Warren McGarry, Vice Chairman; Lee Ann Elliott; Danny Lee McDonald; Thomas E. Harris; Thomas J. Josefiak; Jo-Anne L. Coe, Secretary of the Senate, Ex Officio; Benjamin J. Guthrie, Clerk of the House of Representatives, Ex Officio. For more information, call 202/376-3120 or toll-free 800/424-9530.



OPINIONS

ALTERNATE DISPOSITION OF ADVISORY OPINION REQUEST

AOR 1986-3: Committee's Reporting of Stock Contribution Sold on the Open Market

The requester withdrew the request in a letter of February 14, 1986.

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 1986-1: Corporate Vendor's Offer to Provide Free Tickets to Committee

The Committee to Re-Elect Congressman Ron Dellums (the Committee) had reserved the Warner Theater in Washington, D.C. (the Theater) for a concert fundraiser that the Committee planned to hold in March 1986. Subsequently, however, the Theater decided it would be financially beneficial to book a musical production for a block of time that included the date of the Committee's fundraiser. To mitigate any harm the cancellation might cause the Committee, the Theater may offer the Committee 100 free tickets to a performance of the musical production. This settlement offer would not result in a prohibited corporate contribution from the Theater to the Committee, provided:

- o The offer was commercially reasonable; and
- o The offer was made in the ordinary course of business. See AO 1983-6.

To determine whether the Theater's proposed settlement offer was commercially reasonable, the Commission would consider: 1) whether the Committee attempted to find, or was offered, another comparable facility for the fundraiser; and 2) whether the Theater's offer was reasonably related to total funds the Committee might have lost as a result of canceling the fundraiser. Similarly, in determining whether the proposed offer was transacted in the ordinary course of business,

the Commission would consider: 1) whether the Theater had an established policy of making similar offers to other clients (political and nonpolitical) and 2) whether the Theater regularly made such offers to settle disputes with customers.

Reporting Requirements

Assuming the Theater's settlement offer meets the standards of being commercially reasonable and made in the ordinary course of business, the Committee should report the receipt of the tickets as a memo entry on Schedule A of FEC Form 3. The memo entry should briefly describe the reason the Committee received the tickets. (Date issued: February 21, 1986; Length: 3 pages)

AO 1986-2: Candidate's Door-to-Door Sales Campaign

To help finance Gary Robbins' campaign for an Iowa House Seat, Mr. Robbins and his wife may sell dry beans and popcorn "door-to-door." Since the purpose of the sales is to solicit funds for Mr. Robbins' campaign and to advocate his candidacy, proceeds of the sales are contributions and costs incurred for the sales program are expenditures. Mr. Robbins' campaign committee is responsible for the reporting of these transactions.

As campaign contributions, the sales proceeds are subject to the election law's monetary limits and prohibitions. 2 U.S.C. §§441a, b, c, e and g; 11 CFR 100.7(a)(2). Depending on the amount of an individual's purchase, the law's requirements for itemized recordkeeping and reporting may apply. 2 U.S.C. §§432(b)-(c); 11 CFR Parts 102 and 104.

If Mr. Robbins pays the expenses (e.g., for supplies) from personal funds, they must be reported as both in-kind contributions to, and expenditures by, his campaign. 11 CFR 104.13(a)(2). Alternatively, the personal funds may be considered (and reported as) candidate loans.

The Commission distinguished its decision in this opinion from its decision in several previous opinions concerning candidate activities. In those opinions, the activities did not result in the making of campaign contributions or expenditures because they were entirely separate from the candidates' campaigns. See AOs 1979-72 and 1985-32. (Date issued: February 21, 1986; Length: 3 pages)

AO 1986-4: Corporation's Program to Encourage Employee Contributions

If Armstrong World Industries, Inc. (Armstrong) inaugurates a program designed to encourage contributions from its administrative and executive personnel to federal candidates and political committees, Armstrong must establish and register

with the FEC a separate segregated fund (the fund). As required by FEC Regulations, the fund would have to file periodic reports of its receipts and disbursements for federal elections, including any earmarked contributions from its employees which the fund might forward to federal candidates and political committees.

If the fund exercises any control over an earmarked contribution, the fund must:

- o Report the transaction as a contribution from both the employee and the fund; and
- o Comply with the solicitation requirements for such contributions.

Moreover, the earmarked contribution would be subject to the monetary limits for both the employee and the fund. 2 U.S.C. §§441a(a)(1) and (2) and §441b(b)(3)(A); 11 CFR 104.3(b), 110.6(d) and 114.5(a)(1)-(2).

Proposed Contribution Program

As originally proposed, Armstrong's plan represents a corporate endeavor to support candidates and solicit and direct contributions to candidates. For example, Armstrong's Washington office was to distribute information concerning Congressional races and recommend contribution recipients. Armstrong would then actively persuade its executives to participate in the program, would seek contribution pledges from them and would monitor their participation in the program.

In conducting the program, Armstrong planned to act sometimes as a conduit for employees' earmarked contributions. In response to a candidate's fundraiser, the program administrator would collect employees' contribution checks (made payable to the candidate's campaign committee) and transmit the checks in one bundle to the candidate.

Those employees Armstrong recruited as volunteers to assist in the program would provide support services but would not direct the program.

Separate Segregated Fund Required

Armstrong must establish a separate segregated fund to avoid violating the election law's ban on corporate expenditures and contributions in connection with federal elections. See 2 U.S.C. §441b. Armstrong's contributions program would not qualify as an exempt nonpartisan activity designed to encourage employees' participation in the political process (11 CFR 114.4); nor would it be considered an exempt volunteer activity by employees who make incidental use of corporate facilities for their own political activities (11 CFR 114.9).

The Commission expressed no opinion on the application of the proposed program to contributions for state and local candidates and committees. (Date issued: February 27, 1986; Length: 7 pages)

AO 1985-5: Excess Campaign Funds Transferred from Candidate's Federal Committee to His Local Committee

The Barnes for Congress Committee (the federal committee), the principal campaign committee for Michael P. Barnes' 1984 Congressional campaign, may transfer its remaining funds to the Barnes for St. Joseph County Prosecutor Committee (the local committee), Mr. Barnes' campaign committee for local office, provided:

- o The transfer is permissible under Indiana law; and
- o The transferred funds are used for Mr. Barnes' election to local office and are not converted to his personal use.

Once it transfers its remaining excess funds to the local committee, the federal committee may terminate by filing a termination report on FEC Form 3 (or in a letter containing the same information). The report must disclose the disposition of the committee's remaining funds. 11 CFR 102.3(a).

Section 439a of the Federal Election Campaign Act (the Act) permits federal candidates to use their excess campaign funds for such lawful purposes as the proposed transfer. However, the provision expressly prohibits candidates who were not Members of Congress on January 8, 1980, such as Mr. Barnes, from converting excess campaign funds to personal use.

The Commission noted that provisions of the Act governing the proposed transfer would not preempt relevant provisions of Indiana law (e.g., Indiana laws regulating the amount of funds which the federal committee may transfer to the local committee). (Date issued: February 27, 1986; Length: 2 pages)

AO 1986-7: Cooperative PAC's Shareholder Solicitation Plan

The American Crystal Sugar Company (the Cooperative), an agricultural cooperative incorporated under Minnesota law, may implement a plan to solicit contributions to its separate segregated fund (the fund) from noncorporate shareholders who own preferred stock in the cooperative. 2 U.S.C. §441b(b)(4)(C); 11 CFR 1147(a). Shareholders who decide to participate in the program will have their contributions deducted from the Cooperative's payments for their sugarbeet crops. The total amount deducted may not exceed the monetary limits for an individual's contributions to political committees. See 2 U.S.C. §441a(a)(1)(C) and 441a(a)(3).

Cooperative's Solicitation Plan

Under the Cooperative's proposed solicitation plan, a shareholder with preferred stock may sign a form authorizing the fund to deduct a portion of his/her proceeds on the sugarbeet crop. The au-

continued

thorization form suggests that stockholders contribute \$1 per share of preferred stock. (Acreage under cultivation is proportionate to the number of preferred shares an individual shareholder owns.) The form includes a guideline stating that the shareholder is free to contribute more or less than that amount. The form also states that the Cooperative will neither favor nor disadvantage the shareholder on the basis of the amount of his/her contribution or a decision not to contribute.

Once the shareholder signs the authorization form, a contribution will be automatically deducted once a year and forwarded to the fund. The shareholder may withdraw from the deduction plan by notifying the cooperative in writing by March 1 of any year.

The Cooperative's proposed deduction plan is permissible because:

- o The guideline contained in the combined solicitation and authorization form meets the solicitation requirements of the Act and FEC Regulations (2 U.S.C. §441b(b)(3); 11 CFR 114.5(a)); and
- o The contributions will come from permissible funds (i.e., the shareholders' earnings on their crops).

(Date issued: March 14, 1986; Length: 3 pages)

COURT CASES

FEC v. WOLFSON

On February 6, 1986, the U.S. District Court for the Middle District of Florida, Tampa Division, issued an order granting the FEC's motion for summary judgment in a suit which the FEC had brought against Allen Wolfson on October 7, 1985. (*FEC v. Allen Z. Wolfson*; Civil Action No. 85-1617-CIV-T-13)

As requested by the FEC, the court found that Mr. Wolfson had violated the election law by making contributions to authorized candidate committees which exceeded the law's monetary limits (2 U.S.C. §441a(a)(1)(A)) and which were made in the names of other persons (2 U.S.C. 441f).

The court permanently enjoined Mr. Wolfson from further violations of the election law and imposed a \$52,000 civil penalty on him.

FEC v. AMERICAN INTERNATIONAL DEMOGRAPHIC SERVICES, INC.

On February 10, 1986, the U.S. District Court for the Eastern District of Virginia issued an order permanently enjoining American International Demographic Services, Inc. (AIDS) and its Vice President, Ernest Halter, from using FEC campaign finance information for commercial purposes. The court imposed a \$3,500 civil penalty on the defendants for illegal use of the information.

Background

The Federal Election Campaign Act states that "...any information copied from reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee." 2 U.S.C. §438(a)(4). While the Commission has allowed FEC information on political committees to be used for contribution solicitations, the agency has forbidden the use of individual contributor information for commercial purposes (e.g., product advertisements) or for solicitations.

The defendants' violation of this provision involved their illegal use of two FEC computer tapes containing individual contributor information that had been disclosed on FEC reports filed by political committees. The tapes had been purchased by Mr. Halter's wife on behalf of the Voter Information Council PAC (VICPAC), a nonconnected political committee she had established in April 1982. (Mrs. Halter claimed she had purchased the tapes to purge outdated information on lists owned by VICPAC and by her.) As part of an agreement AIDS had entered into with Working Names, Inc., a list management company, Mr. Halter subsequently transferred the two FEC tapes to the company. Working Names used the tapes, along with two other FEC tapes, to create four mailing lists which the company marketed to list brokers and mailers.

The defendants' illegal use of FEC contributor information was discovered by the National Republican Congressional Committee (NRCC) when a direct mail piece was addressed to "Kane Orsell," a fictitious contributor NRCC had listed on a report filed with the FEC. (FEC Regulations allow a political committee to "salt" its FEC report with up to ten fictitious names and addresses for purposes of detecting such illegal use of its contributor names. 11 CFR 104.3(e).) The mailing was sent by the American Legislative Exchange Council, which had purchased its list of addressees from a broker that Working Names had supplied with lists. (The Council had purchased the list for a one-time use.)

After tracing original ownership of the mailing list back to AIDS, NRCC held a meeting with Mr. Halter in which he agreed, among other

things, to take the names of NRCC contributors off the list broker market and to provide NRCC with a list of the direct mail companies that had rented the names. Mr. Halter failed to do any of these things. Consequently, on September 28, 1982, the NRCC filed a complaint against both Mr. Halter and AIDS with the FEC. After investigating the matter, the FEC found probable cause to believe that the defendants had violated the election law. Subsequently, when defendants failed to enter into a conciliation agreement with the agency, the FEC brought suit against them in the district court.

FEC's Suit

In its suit, the FEC asked the court to declare that Mr. Halter and AIDS had violated Section 438(a)(4) by using reports filed with the FEC for commercial purposes. Specifically, the FEC asked the court to find that defendants used FEC information to: a) prepare contributor listings they rented to various organizations through a broker and b) increase the commercial value of contributor listings they already had.

Court's Ruling

After examining the evidence presented for its consideration at trial, the court found that "the defendants willfully violated the Act by having Working Names manage the [two FEC computer] tapes for the purpose of renting them out to brokers and mailers."

NEW LITIGATION

FEC v. Rhoads for Congress Committee

The FEC asks the district court to make the following declarations:

- o Mary Rhoads, mother of 1982 Illinois House candidate Mark Rhoads, made excessive contributions to Mr. Rhoads' principal campaign committee by personally endorsing and providing security for two loans, portions of which were accepted by the committee (i.e., \$17,000).
- o The Mid-America Conservative Political Action Committee (MAPAC) made an excessive contribution of \$2,000 to the committee. (At the time the contribution was made, MAPAC's per election limit was \$1,000, rather than \$5,000, because the PAC had not yet qualified for multi-candidate committee status.)
- o The Committee and its treasurer, William Naegel, in turn, violated the law by accepting the excessive contributions.

The FEC asks the court to order the Committee and its treasurer to refund the excessive portion of the contributions (i.e., \$16,000) to Mrs. Rhoads and to assess an appropriate civil penalty against each of the defendants.

U.S. District Court for the Northern District of Illinois, Civil Action No. 85-10676, December 27, 1985.

LEGISLATION

FEC SUGGESTS 24 RECOMMENDATIONS FOR CHANGES IN ELECTION LAWS

On March 11, 1986, the Commission transmitted to Congress and the President 24 recommendations for legislative changes in federal election laws. The recommendations were accompanied by an explanation that at least eight of the proposals offer total budgetary savings in the agency's operations of between \$400,000 and \$500,000. The Commission is statutorily mandated to submit recommendations each year "for any legislative or other action the Commission considers appropriate...." 2 U.S.C. §438(a)(9).

Among the 24 proposals submitted this year, four were aimed at enhancing public disclosure and reducing some of the bookkeeping requirements for campaigns and political committees. These four proposals are summarized below, along with the FEC's projected savings in implementing two of them. The proposals contain recommendations that Congress:

- o Require House and Senate campaigns to report their financial activity for an entire campaign cycle. The current practice of reporting activity on a calendar-year basis makes it difficult to determine total amounts raised and spent on campaigns spanning more than one year. (estimated savings: \$140,000)
- o Require monthly filers to file their reports closer to the closing date of a reporting period in order to make information more timely.
- o Clarify the statutory provision requiring political committees to report their operating expenses. Under the current law, it is unclear whether a committee must report only initial payments to contractors, vendors and other payees or whether the committee must also report payments that the initial payees, in turn, make to subcontractors, agents and others.
- o Apply the contribution limits to a campaign cycle, rather than to individual elections (e.g., primary, general, special or runoff). This amendment would reduce burdensome record-keeping requirements for committees, while maintaining current contribution limits. (estimated savings: \$140,000)

Included among the Commission's remaining 20 recommendations were suggestions that Congress:

- o Reaffirm its intent that draft committees are "political committees" subject to the reporting requirements, prohibitions and limits of the Act;
- o Make the FEC the sole point of entry for all documents filed by federal candidates and political committees;

continued

- o Eliminate state-by-state limits for publicly funded Presidential primary candidates (estimated savings: \$140,000);
- o Define the extent to which foreign nationals may participate, if at all, in any American election; and
- o Establish a reimbursement account for the FEC that will enable the agency to offset expenses incurred from reproducing documents and tapes purchased by requesters (estimated savings: \$100,000).

The full text of the recommendations will be published in the Commission's 1985 Annual Report. Copies of the recommendations are also available from the FEC's Public Records Office, 999 E Street, N.W., Washington, D.C. 20463.

PUBLIC APPEARANCES

- 4/4 Trinity College
Washington, D.C.
Patricia Klein, Public Affairs Specialist
- 4/4 American Bar Association
Baltimore, Maryland
Charles N. Steele, General Counsel
- 4/16 Yale Law School
New Haven, Connecticut
Charles N. Steele, General Counsel
- 4/22 U.S. Department of Commerce
1986 Class of Commerce,
Science and Technology
Fellows
Washington, D.C.
Bobby Werfel, Chief Information Services
- 4/29 Elkhart County League
of Women Voters
Elkhart, Indiana
Penelope Bonsall, Director,
National Clearinghouse on
Election Administration
- 4/30 Federal Bar Association,
Delaware Chapter
Wilmington, Delaware
Bradley Litchfield, Assistant
General Counsel

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800 LINE

- Designating a principal campaign committee, 3:5
- Transfer of candidate funds from state to federal committee, 1:8

COURT CASES

- Antosh v. FEC, 3:8
- FEC v. Californians for Democratic Representation, 3:8
- FEC v. Citizens Party, 3:8
- FEC v. Eldredge, 1:10
- FEC v. Haley, 1:11
- FEC v. MAPAC, 1:10
- FEC v. NRA, 1:11
- FEC v. Sailors' Union of the Pacific Fund, 2:3
- Gramm v. FEC; FEC v. Gramm, 1:10
- Alwin Hopfman v. FEC, 2:3

Mini Conference For Candidates

Program: The Mini Conference will be held on May 29-30 and repeated on June 6. It consists of two workshops designed for candidate committees. For a full description of the program, turn to page 12.

Registration and Fees: For each conference, there is a fee of \$10 to cover refreshments. (If you attend only one workshop, the fee is \$5.) All materials are provided, at no cost, by the Federal Election Commission. To register for one or both workshops, complete the form below and return it by May 2, with your check, to the Federal Election Commission. Make checks payable to FEC Conference.

Location: The workshop will be held in the Conference Room on the 9th floor of the Federal Election Commission, 999 E Street, N.W., Washington, D.C.

Transportation: Limited parking is available in nearby public parking lots. The Commission may be reached easily by public transportation. Consult the map on page 3.

More Information: For more information, contact Ian Stirton at the Federal Election Commission, 800/424-9530 or 202/376-3120.

REGISTRATION FORM

Name _____ Organization _____

Address _____ Phone _____

First Session

_____ Introductory Workshop (May 29)

_____ Advanced Workshop (May 30)

Second Session (repeat)

_____ Introductory Workshop (June 6, morning)

_____ Advanced Workshop (June 6, afternoon)

Please mail this form, together with your check, to:

FEC Conference
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

_____ Amount (please fill in)

Mini Conference Series

The Federal Election Commission announces a new Mini Conference series. The first conference, to be held in May and repeated in June, is designed for Congressional candidate committees. The program offers two workshops, an introductory session and an advanced course. Because space is limited, pre-registration is required. Individuals may sign up for one or both workshops. In addition, attendees may make appointments to meet with FEC staff.

To register, turn to page 11.

First Session — May 29 and 30, 1986

Thursday May 29	<u>Candidates: Introductory Workshop</u>	
	8:30 - 9:00	Registration and Coffee
	9:00 - 10:30	Sources of Candidate Support
	10:30 - 10:45	Break
	10:45 - 12:00	Candidate Registration and Reporting
Friday May 30	<u>Candidates: Advanced Workshop</u>	
	8:30 - 9:00	Registration and Coffee
	9:00 - 10:30	Joint Fundraising
	10:30 - 10:45	Break
	10:45 - 12:00	Problems to Avoid

Second Session — June 6, 1986

Friday June 6 (Morning)	<u>Candidates: Introductory Workshop</u>	
	8:30 - 9:00	Registration and Coffee
	9:00 - 10:30	Sources of Candidate Support
	10:30 - 10:45	Break
	10:45 - 12:00	Candidate Registration and Reporting
Friday June 6 (Afternoon)	<u>Candidates: Advanced Workshop</u>	
	2:00 - 3:15	Joint Fundraising
	3:15 - 3:30	Break
	3:30 - 4:45	Problems to Avoid

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

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