

FEDERAL ELECTION COMMISSION

RECORD

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LEGISLATION

CONGRESS REPEALS GRANDFATHER CLAUSE

In the recently enacted Ethics Reform Act of 1989, Congress repealed the "Grandfather Clause" in the Federal Election Campaign Act (the Act). That clause in 2 U.S.C. §439a permitted retiring Senators and Congressmen who were in office on January 8, 1980, to convert excess campaign funds to personal use.

Under the Ethics Reform Act's 1989 amendments to the Act, signed into law by President Bush on November 30, 1989, all Members of Congress will be prohibited from converting excess campaign funds to personal use. The amendment will affect Members in two stages:

- (1) Members serving in the 102nd Congress (1991-1993) or earlier Congresses, and who were previously covered by the grandfather clause, may not convert to personal use those "excess amounts totaling more than the amount equal to the unobligated balance on hand" on November 30, 1989.

ELECTION LAW CONFERENCES TO BE HELD IN MARCH

The FEC will be holding two conferences on campaign finance law in March:

- o A regional conference for candidates, campaign workers, PACs and others active in campaign finance, in Scottsdale, AZ, on March 8 and 9. The Arizona Secretary of State's Office will co-host.
- o A conference for candidates in Washington, D.C., on March 30.

See page 11 for details.

- (2) Members who serve in the 103rd Congress (beginning in January 1993), or in any later Congress, may not convert any excess funds to personal use.

The 1979 amendments to the Act (effective since January 1980) permitted candidates and their committees to use excess campaign funds for several specific purposes and for "any other lawful purpose," but prohibited excess funds to be converted to "any personal use." 2 U.S.C. §439a. However, the amendments included an exception: The ban on using excess funds for personal use did not apply to Members of Congress holding office on January 8, 1980. Along with the Act, House and Senate rules also govern the use of excess campaign funds.

TABLE OF CONTENTS

LEGISLATION
1 Grandfather Clause Repealed
ADVISORY OPINIONS
2
COMPLIANCE
4 Summary: MUR 2823
6 Publicly Released MURs
COURT CASES
7 FEC v. Furgatch
7 New Litigation
7 FEDERAL REGISTER NOTICES
800 LINE
8 When Reimbursements Are Required in SSF Fundraising
9 New Treasurer
PUBLICATIONS
10 E&J Compilation
10 INDEX
CONFERENCES
11 Election Law Conferences Planned

**ADVISORY OPINION REQUESTS**

The following chart lists recent requests for advisory opinions (AORs). The full text of any AOR is available for public inspection and comment from the FEC's Public Records Office.

1989-31

Act's preemption of state law governing reporting of federal campaign committee's contributions to state and local candidates. (Date made public: December 6, 1989; Length: 2 pages)

1989-32

Contributions by foreign nationals to committee active in referendum campaign. (Date made public: January 6, 1990; Length: 7 pages, including supplements)

1990-1

Corporation's sale of 900-line telephone service to political committees. (Date made public: January 9, 1990; Length: 13 pages, including supplements)

1990-2

Candidate committee's use of excess campaign funds as collateral for loan made to local party committee. (Date made public: January 9, 1990; Length: 2 pages)

ADVISORY OPINION SUMMARIES**AO 1989-27: Act's Preemption of State Law Governing Solicitations by State Employees**

The Federal Election Campaign Act (the Act) preempts, in part, a Massachusetts state law prohibiting state and local government employees (other than elected officials) from soliciting or receiving contributions for campaign purposes.

Section 13 of Chapter 55 of the General Laws of the Commonwealth of Massachusetts provides that no state or local government employee, other than an elected officer, may directly or indirectly solicit or receive a political contribution. The section does, however, permit the solicitation and receipt of contributions by committees organized to promote the candidacy of state and local government employees, but only if those contributions are not received or solicited from persons having an interest in a matter in which the employee participated during the course of his employment "or which is the subject of [the employee's] official responsibility."

The Act provides that federal law "supersedes and preempts" all state laws with respect to federal elections. 2 U.S.C. §453. Commission regulations specify that the federal law supersedes state laws concerning federal campaign activities covered by the Act, including limitations and prohibitions on contributions. However, the Act does not supersede state laws governing the qualifications of candidates, dates and places of elections, voter registration, voting fraud or candidates' personal financial

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disclosure. 11 CFR 108.7(b) and (c). Nor did Congress intend for the Act to supersede state laws regarding the political conduct of state and local employees--the "little Hatch Acts."¹

In light of FEC regulations and the legislative history, the Act does not preempt the Massachusetts law's ban on contributions directly solicited or received by state and local government employees, including solicitations by state or local employees who are candidates for federal office. The Act does, however, preempt the state law's prohibition on a political committee's solicitation or acceptance of contributions to influence federal elections because that prohibition extends beyond the particular state employee and regulates an area that Congress intended for the Act to cover, i.e., the source of campaign funds. Similarly, to the extent that the prohibition on indirect solicitations by employees relates to solicitation or receipt by individuals in the campaign acting on behalf of the employee/candidate, that portion of section 13 is also preempted by the Act. Thus, while candidates who are also state or local government employees in Massachusetts may not solicit funds for their own campaigns, their campaign committees and agents may solicit and receive contributions from anyone who is otherwise permitted by federal law to contribute to federal candidates. Commissioner Thomas issued a dissenting opinion. (Date issued: December 11, 1989; Length: 6 pages)

AO 1989-29: PAC Established by Company Owned by Foreign Principal

GEM of Hawaii, Inc., may make contributions to state and local candidates in Hawaii through GEM PAC, the political committee it has established, provided foreign nationals do not participate in any decisions concerning GEM's contributions to the PAC or to other political committees involved in state or local elections. Because the corporation is the only source of funds for GEM PAC, however, the committee may not make contributions or expenditures in connection with federal elections.

GEM is a wholly owned subsidiary of a foreign company; it is incorporated under Hawaiian laws and operates principally in Hawaii, deriving its revenues from its U.S. operations. GEM PAC's members and directors are not foreign nationals.

State and Local Activity

The Act prohibits contributions by foreign nationals in connection with any election, including state and local elections. 2 U.S.C. §441e. A "foreign national" is defined, for the Act's purposes, at 22 U.S.C. §611(b). As a company incorporated under U.S. laws and having its principal place of operation in the U.S., GEM falls outside of the definition of "foreign national." Furthermore, because GEM is not predominantly funded by its foreign parent and derives its revenues from its U.S. operations, the company's contributions to its PAC are U.S. funds and are not prohibited under the Act's foreign national provision. See AOs 1989-20 and 1985-3. Therefore, GEM may contribute to state and local candidates by itself or through GEM PAC to the extent that (1) state and local laws permit such corporate

(continued)

1. See H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. 11 (1974); also H.R. Rep. No. 93-1438, 93d Cong., 2d Sess. 102 (1974) and 120 Cong. Rec. S18538 (October 8, 1974).

1. Hawaiian state laws permit corporate contributions of up to \$2,000 per election for state and local candidates. HRS §§11-191(18) and 11-204(a).

activity;¹ and (2) foreign nationals do not influence GEM's decisions concerning political contributions, or participate in the decisions or administration of GEM PAC.

Federal Activity

As it currently operates, GEM PAC is not a separate segregated fund of GEM, but rather a vehicle through which the corporation proposes to make contributions to candidates. The Act prohibits corporate contributions to federal candidates, so GEM PAC, holding only corporate funds, may not make any contributions in connection with federal elections. 2 U.S.C. §441b.

GEM may establish a separate segregated fund for federal election activity, however. Under the procedures set forth at 11 CFR 114.5, such a committee could make contributions in connection with federal elections (and for nonfederal elections, if permitted by state and local laws) provided that the separate segregated fund accepted no contributions from foreign nationals and that the decisions and administration of the fund remained independent of direction by foreign nationals. (Date issued: December 19, 1989; Length: 5 pages)

AO 1989-30: Payment to Senator for Teaching Course

Compensation received by Senator Joseph Biden for teaching a law school course will not be considered an honorarium and, therefore, will not be subject to the Act's \$2,000 limit on honoraria received by Members of Congress and other government officials.

Senator Biden has been invited by an accredited law school to teach a course in the school's regular curriculum. The course will be scheduled during the regular school term and will be repeated in subsequent years. The Senator will be paid from the university's general funds, which are used to compensate other law school professors, and not from any other funds designated for his compensation. The amount will be determined under the school's usual guidelines for teaching fees.

The Act prohibits an elected or appointed officer or employee of the federal government from accepting an honorarium of more than \$2,000 for any appearance, speech or article. 2 U.S.C. §441i. FEC regulations, however, exclude payments for certain activities from the definition of an honorarium, including the payment of a stipend for services by the officeholder which are provided on a continuing basis to the organization making the payment. 11 CFR 110.12(c)(3).

In Senator Biden's case, the payment he receives for teaching the course would be a stipend, not an honorarium, and thus would not be subject to the Act's honorarium limits. See also AO 1985-4. (Date issued: December 19, 1989; Length: 3 pages)

COMPLIANCE

MUR 2823: Excessive Contribution Received by Candidate Committee

This MUR, resolved through conciliation, concerned a Congressional candidate committee's acceptance of an excessive contribution and failure to disclose the contribution correctly.

Background

Initiated both sua sponte (i.e., by the respondent) and through a complaint filed by a state party committee,¹ this enforcement action concerned a transaction in which a Congressional candidate received a \$20,000 loan from a supporter, secured with 4,000 shares of corporate stock from the candidate's personal assets. The candidate then passed the funds on to his campaign committee. The candidate and the supporter ratified their agreement with a preprinted promissory note obtained from a bank. Although the candidate claimed that the transaction constituted a sale, in which

1. The Commission merged the sua sponte complaint, Pre-MUR 201, with the party complaint, MUR 2742.

the stock was exchanged for cash, the Commission viewed the transaction as a loan to the committee and, thus, found reason to believe that the candidate and his committee had accepted an excessive contribution, in violation of 2 U.S.C. §441a(f). The Commission also found reason to believe that the supporter had made an excessive contribution, in violation of 2 U.S.C. §441a(a)(1)(A).

An examination of the reports the committee filed during the period revealed that the committee had inaccurately disclosed the source of the \$20,000. The Commission found reason to believe that the committee had violated 2 U.S.C. §434(b).

General Counsel's Report

Excessive Contribution. The General Counsel challenged the respondents' claim that the \$20,000 represented proceeds from a sale of stock to a supporter, which the candidate, in turn, loaned to the committee. The respondents asserted that the preprinted promissory note was used to execute the transaction only for the sake of convenience; nonetheless, the General Counsel noted evidence showing that the parties treated the transaction as a campaign loan in accordance with the terms of the note.

For example, in his initial contact with the Commission regarding the matter (a letter that led to the sua sponte complaint), the candidate referred to the \$20,000 as a "loan" and stated that the loan was secured by 4,000 shares of stock. The preprinted promissory note was signed only by the candidate, though a typed revision on the form stated that the term "Lender" referred to the supporter (i.e., the individual who provided the \$20,000) as payee.

Information included in the candidate's Financial Disclosure Statements filed with the U.S. House of Representatives also supported the General Counsel's recommendation that the transaction be viewed as a loan. In a Financial Disclosure Statement filed during the year after the election (the candidate had, in the meantime, won the House seat he had sought), the candidate

disclosed the \$20,000 as a "personal" debt to the supporter, and at the same time the reports revealed that the ownership of the stock had never changed.

Additionally, the \$20,000 was eventually repaid, with interest, to the supporter in compliance with terms set forth in the note. Checks totaling \$23,754, drawn on the candidate's personal account, were written to the supporter in the period following the receipt of the loan. Notations on the checks indicated the candidate's intention to repay a loan. One of the checks, for example, bore the notation "payment on note." Checks from the committee to the candidate, written at the time the repayments to the supporter were made, appeared to reimburse the candidate for the amounts repaid to the supporter. This evidence further substantiated the General Counsel's view that the candidate, acting as an agent of his campaign, received an excessive loan from a supporter and turned the money directly over to the committee; repayments by the committee were also made through the candidate. 2 U.S.C. §432(e)(2).

Under the Act, a loan to a candidate is a "contribution" when it is made, and it remains a contribution until it is repaid. As contributions, loans from individuals are limited to \$1,000 per candidate, per election. 2 U.S.C. §441a(a)(1)(A). Section 441a also prohibits anyone from knowingly accepting an excessive contribution.

Disclosure. In its reports, the campaign committee reported the \$20,000 as a loan from the candidate's personal funds, rather than from the supporter. The election law requires that committee reports disclose the identity of any person making a loan to the the committee during the reporting period. 2 U.S.C. §434(b)(3)(E).

Commission Determination

The Commission entered into conciliation agreements with the candidate, the committee and the supporter prior to finding probable cause. The agreements included a civil penalty of \$7,750 for the candidate and his committee and a penalty of \$7,500 for the supporter.

MURS RELEASED TO PUBLIC

Publicly released MUR summary files, as announced in FEC press releases on December 12, 18 and 22, 1989, are listed below. Civil penalties resulted from conciliation agreements reached between the respondents and the Commission.

The summary file for each MUR is available from the FEC's Public Records Office.

MUR 2656

Respondents: Food Marketing Institute PAC and treasurer (DC)
Complainant: FEC initiated
Subject: Failure to report on time
Disposition: \$2,000 civil penalty

MUR 2701

Respondents: (a) Iowa Democratic Party and treasurer (IA); (b) Dukakis/Bentsen Committee and treasurer (MA)
Complainant: M. Mahaffey (IA)
Subject: Impermissible expenditures; disclaimer
Disposition: (a) \$500 civil penalty; (b) No reason to believe

MUR 2702

Respondents: (a) Kentucky State Democratic Central Executive Committee and treasurer; (b) Dukakis/Bentsen Committee and treasurer (MA)
Complainant: R. Gable, Chairman, Republican Party of Kentucky
Subject: Prohibited expenditures; disclaimer
Disposition: (a) \$1,200 civil penalty; (b) No reason to believe

MUR 2801

Respondents: (a) York County Republican Committee and treasurer (PA); (b) Dorr Committee and treasurer (PA); (c) Bush/Quayle '88 and treasurer (DC)
Complainant: R. Bitzel, Chairman, Democratic Party of York County
Subject: Failure to register and report; impermissible expenditures; disclaimer; failure to report independent expenditures
Disposition: (a) \$400 civil penalty; (b) \$250 civil penalty; (c) No reason to believe

MUR 2824

Respondents: (a) Du Pont for President committee and treasurer (PA);
Complainant: FEC initiated
Subject: Failure to refund excessive contributions on time
Disposition: \$2,000 civil penalty

MUR 2854

Respondents: National Federation of Federal Employees Public Affairs Council and treasurer (DC)
Complainant: FEC initiated
Subject: Failure to report on time
Disposition: \$1,000 civil penalty

MUR 2902

Respondents: Rep. J. Slattery (KS)
Complainant: F. Logan, State Chairman, Kansas Republican Party
Subject: Failure to file Statement of Candidacy on time
Disposition: \$300 civil penalty

MUR 2942

Respondents: American Petrofina PAC and treasurer (TX)
Complainant: FEC initiated
Subject: Failure to report on time; inadequate contribution information
Disposition: Reason to believe but took no further action

MUR 2970

Respondents: Public Securities Association PAC and treasurer
Complainant: FEC initiated
Subject: Failure to report
Disposition: \$300 civil penalty

MUR 2998

Respondents: Santa Clara County United Democratic Campaign '88 and treasurer (CA)
Complainant: FEC initiated
Subject: Prohibited expenditures and transfers
Disposition: Reason to believe but took no further action

COURT CASES

FEC v. FURGATCH (83-0596-GT(M))

In November 1989 the U.S. District Court for the Southern District of California issued a memorandum decision and order enjoining Harvey Furgatch from violating certain provisions of the Federal Election Campaign Act, namely, the disclaimer notice and reporting requirements connected with independent expenditures. The order followed a decision by the U.S. Court of Appeals, Ninth Circuit, finding that an earlier order issued by the district court had failed to (1) state the reasons for the injunction against Mr. Furgatch, (2) specify the precise conduct prohibited by it and (3) limit the injunction to a reasonable duration.

On remand, the district court cited Mr. Furgatch's past violations of the election law as demonstrating that he was likely to violate the law again. As an additional reason for the injunction, the court pointed out that his conduct since the enforcement action was opened (in 1980) had shown "an absence of good faith efforts by Furgatch to cure his violations."

In accordance with the appeals court's ruling, the district court specified that the injunction prohibited Mr. Furgatch from committing further violations of sections 434(c) and 441d of the Act. Finally, the court limited the duration of the injunction to eight years.

NEW LITIGATION

NRA v. FEC (89-3011)

The National Rifle Association asks the district court to declare that the Commission acted contrary to law in dismissing a 1989 administrative complaint that the NRA had filed against Handgun Control, Inc. (HCI).

In its complaint, the NRA had claimed that HCI had made PAC solicitations outside of its restricted class--i.e., to non-

members. Adopting the recommendations of the General Counsel, who noted that the complaint raised issues that the Commission had already resolved with the respondents in prior enforcement actions, the Commission dismissed the complaint.

The plaintiff also seeks a court order requiring the Commission to conform to the court's declaration by instituting appropriate enforcement against HCI within 30 days. In the alternative, the NRA asks the court to remand its complaint to the Commission for further consideration.

U.S. District Court for the District of Columbia, Civil Action No. 89-3011, November 2, 1989.

FEDERAL REGISTER

FEDERAL REGISTER NOTICES

Copies of Federal Register Notices are available from the Public Records Office.

1989-17

Filing Dates for Texas (18th District) Special Runoff Election (54 Fed. Reg. 48318, November 22, 1989).

1989-18

11 CFR Part 110: Contributions and Expenditures; Prohibited Contributions (Foreign Nationals); Final Rule and Explanation and Justification (54 Fed. Reg. 48580, November 24, 1989)

1989-19

11 CFR Parts 100, 102, 110, 114 and 9034: Affiliated Committees, Transfers, Prohibited Contributions; Annual Contribution Limitations and Earmarked Contributions; Effective Date of Final Rules (54 Fed. Reg. 48580, November 24, 1989)



WHEN REIMBURSEMENTS ARE REQUIRED IN SSF FUNDRAISING

This article addresses situations where a separate segregated fund (SSF) is required to reimburse the corporation or labor organization for costs incurred in fundraising.

The "One Third Rule"

The Federal Election Campaign Act prohibits corporations and labor organizations from making contributions or expenditures in connection with federal elections. However, the Act and Commission regulations do permit corporations and labor organizations to use treasury funds to pay for the establishment, administration and solicitation costs associated with operating an SSF. Corporations and labor organizations may sponsor a fundraising activity, using some tangible premium as an inducement to make contributions to the SSF, such as a prize, a raffle or the sale of fundraising items. See 11 CFR 114.5(b).

In using one of these fundraising premiums, however, the sponsoring organization must be sure that the prize is not disproportionately valuable compared with the contributions it generates.¹ Moreover, the items offered may not be so numerous or valuable that the fundraising procedure becomes, in effect, a means of "trading" treasury funds for voluntary contributions. Accordingly, Commission regulations provide that a reasonable practice to follow is for the SSF to reimburse the corporation or labor organization for any costs that exceed one-third of the money contributed. This standard is commonly referred to as the "one-third rule." 11 CFR 114.5(b)(2).

For example, a corporation or labor organization spends \$300 in treasury funds to purchase a raffle

prize. The SSF raises \$600 at the raffle. Since the cost of the prize (\$300) is more than one-third of the amount raised (\$200), the SSF must reimburse the difference (\$100) to the sponsoring organization. On the other hand, if the SSF collects \$900 in contributions, then the cost of the prize (\$300) equals one-third of the amount raised (\$300), and no reimbursement is necessary.

Prizes and Sale Items

In Advisory Opinion 1981-7, the Commission held that a labor union could use treasury funds to purchase jackets, which would be sold to union members to raise contributions for the union's SSF, provided that the union treasury was reimbursed for any costs that exceeded one-third of the money contributed for the jackets. In Advisory Opinion 1981-40, the Commission held that pen and pencil sets offered by a corporation in return for contributions to its SSF were not so valuable or numerous that a "trading money" situation existed. The \$50 value of each memento--small in comparison with the \$1,000 contribution--did not approach one-third of the money contributed. Thus, no reimbursement was required.

Multiple Prizes

In a situation where multiple prizes are available through a raffle, the Commission explained that to determine whether reimbursement is required under the "one-third rule," the SSF should consider the total value of all the prizes in relation to the total amount of contributions received. See Advisory Opinion 1989-18.

Minimum Guideline

Although a raffle ticket, prize or memento may be offered only to those contributing a specified amount, a minimum guideline for contributions may not be enforced. Thus, the SSF or sponsoring organization must state in the solicitation that contributors are free to contribute more or less than the amount suggested. See Advisory Opinions 1981-7 and 1989-18.

1. Such fundraising devices must also be permitted under state law.

Regular Solicitation Costs

The "one-third rule" does not apply to regular solicitation costs. In Advisory Opinion 1979-72, for example, the Commission stated that a trade association's costs of hosting a fundraiser for its SSF did not have to be reimbursed by the SSF even though the costs of the door prizes and entertainment (for the same event) were subject to the "one-third rule." Similarly, in Advisory Opinion 1980-50, the Commission held that a corporation could pay all the costs of a meeting held to introduce its employees to its SSF. The corporation could lawfully schedule a breakfast or luncheon meeting during business hours, transport the employees to the meeting, and pay the full costs of the transportation and meals. Since prizes were not involved, no reimbursement was required.

NEW TREASURER

This brief article explains the Act's reporting requirements concerning changes in officers. For more information about treasurers' responsibilities, call the FEC and ask for the free brochure, "Committee Treasurers," at 800/424-9530 or 202/376-3120.

What should our committee do if we have a new treasurer? A new treasurer (and any other change in the information disclosed on the Statement of Organization) must be reported within 10 days after the change takes place.

How should we report the change? By filing an amended Statement of Organization (FEC Form 1) or a signed letter. The amended Statement need contain only the committee's name, identification number (assigned by the FEC when the original Statement was filed) and the name of the new treasurer.

Could we notify the Commission simply by having the new treasurer sign the next report (Form 3 or 3X)? No. The change in the position of treasurer must be reported separately--either in a letter or in an amended Statement of Organization.

If I don't have my committee's identification number, how can I get it? By calling the FEC's Public Records Office at 800/424-9530 or 202/376-3140.

Who should sign the amendment to the Statement of Organization? Either the outgoing or the incoming treasurer may sign.

Must the treasurer be involved with the committee's day-to-day operations? No. The treasurer is responsible for seeing that certain activities are carried out, but other individuals (such as committee support staff or professional consultants) may actually perform the duties. However, the treasurer (or a properly designated assistant treasurer) must actually sign all reports. For example, an accountant or bookkeeper may handle the recordkeeping and reporting duties, but the treasurer remains responsible for the committee's compliance with campaign finance laws.

Why does the FEC recommend that committees also designate an assistant treasurer on the Statement of Organization? To ensure continuity, even if the treasurer is unavailable. Under the law, a political committee must have a treasurer when it conducts financial transactions. However, an assistant treasurer who has been designated on the Statement may assume the treasurer's responsibilities in case the treasurer is absent or resigns unexpectedly. The assistant treasurer, for example, could sign a committee's reports. Moreover, with an assistant treasurer, a committee could continue to accept contributions and make expenditures even if the office of treasurer were vacant.

How does the committee name an assistant treasurer? By filing an amendment to the Statement of Organization (following the same procedures described above). Note that your committee may name an assistant treasurer at any time.

PUBLICATIONS

EXPLANATION & JUSTIFICATIONS FOR FEC REGULATIONS: 1975 - PRESENT

The Commission has recently updated its compilation of Explanation and Justifications (E&Js) that have been issued for proposed FEC regulations since 1975. The E&Js accompany regulations submitted by the FEC to Congress and explain the origin and intent of the regulations proposed.

Designed as a loose-leaf binder insert, the compilation contains the following:

- o E&Js for all current regulations, as well as for older rules that have been revised or deleted;
- o E&Js for rules that never took effect, along with the text of the proposed rules;
- o A citation index identifying all E&Js applicable to each regulation;
- o A subject index to help locate topics addressed by more than one E&J;
- o A conversion table showing the widespread changes in FEC regulations resulting from the 1979 amendments to the Federal Election Campaign Act; and
- o An appendix that lists previous citations for current regulations.

The E&J compilation is a useful reference tool for attorneys, accountants and others who work regularly with federal election law. The recent updates will be mailed automatically to current subscribers. The Commission notifies subscribers of available updates and applicable copying fees as they are issued.

The volume costs \$25.00. To order and get on the mailing list for future updates, call the FEC's Public Records Office at 800/424-9530 or 202/376-3140.

INDEX

This cumulative index lists summaries of advisory opinions, court cases, and MURs that have appeared in the Record during 1990, as well as 800 Line articles. The first number in each citation refers to the "number" (month) of the Record issue; the second number, following the colon, indicates the page number in that issue.

ADVISORY OPINIONS

- 1989-21: Fundraising by sole proprietor in cooperation with candidates, 1:9
- 1989-25: Preemption of state law limiting party spending on behalf of candidates, 1:10
- 1989-26: Automatic bank transfers from contributor's account to candidate committee's account, 1:11
- 1989-27: Act's preemption of state law governing solicitations by state employees, 2:2
- 1989-29: PAC established by company owned by foreign principal, 2:3
- 1989-30: Payment to Senator for teaching course, 2:4

COURT CASES

- FEC v. _____
 - Franklin, 1:13
 - Furgatch (83-0596-GT(M)), 2:7
- _____ v. FEC
 - NRA (89-3011), 2:7

MUR SUMMARIES

- MUR 2823: Excessive contribution received by candidate committee, 2:4

800 LINE

- Combined dues/solicitation statements, 1:17
- Designating a principal campaign committee, 1:19
- New treasurer, 2:9
- When reimbursements are required in SSF fundraising, 2:8

CONFERENCES

ELECTION LAW CONFERENCE SERIES

In March the Federal Election Commission will hold two conferences on campaign finance laws:

Arizona Regional Conference

On March 8 and 9 the FEC and the Arizona Secretary of State's Office will hold a regional conference on campaign finance laws at the Safari Resort in Scottsdale, Arizona. The conference will include workshops on candidate campaigns, party and PAC activity, contributions and reporting.

Commissioners and staff members from the FEC and the Arizona Secretary of State's Office will conduct the sessions and answer questions about federal and state election rules.

The \$50 registration fee includes all materials, lunch and refreshments.

Washington, D.C., Candidate Conference

On March 30, the Commission will host a conference at the Washington Court on Capitol Hill for candidates and staff members preparing for the 1990 elections. Workshops will be conducted by Commissioners and FEC staff members; a representative of the Internal Revenue Service will speak about election-related tax issues.

The \$65 registration fee includes all materials, lunch and refreshments.

To receive a registration form for either of these conferences, call the FEC at 800/424-9530 or 202/376-3120.

CHANGE OF ADDRESS?**Political Committees**

Registered committees automatically receive the Record. Any change of address by a registered committee must, by law, be made in writing by filing an amended FEC Form 1 (Statement of Organization) with the Clerk of the House, Secretary of the Senate or the FEC, as appropriate.

Other Subscribers

Record subscribers (who are not registered committees), when notifying us of a change of address, should include the following information:

- o Subscription number
- o Name of person receiving the Record
- o Old address
- o New address

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