Conferences

FEC 1999-2000 Conference Series Set to Start in April

During this year and next, the FEC will sponsor a series of conferences on campaign finance. At each conference, Commissioners and FEC staff will conduct practical workshops on various aspects of the law.

The first conference, a Corporate and Labor Conference scheduled for April 22-23, will be held in Washington, DC, at the Hyatt Regency on Capitol Hill. The $250 registration fee covers the conference, materials, breakfasts, lunches and refreshments. To register for this conference, call 800/246-7277 or send an e-mail to tsylvester@worldnet.att.net.

All registration forms and fees must be postmarked by April 8. A $10 fee will be added to all late registrations.

For program information, call the FEC’s Information Division at 800/424-9530 (press 1) or 202/694-1100.

A tentative schedule for 1999 and 2000 conferences appears on page 10. The Record will announce more details about the events once plans have been finalized. The information will also be posted on the FEC’s web site—http://www.fec.gov. ◄

Regulations

Commission Sets Dates for Two Public Hearings

The FEC will hold a public hearing on March 17 to receive additional testimony and comments about its proposed changes to the rules governing who qualifies as a member of a membership association. The following week, on March 24, the Commission will hold a public hearing on its proposed changes to rules governing the public financing of Presidential primary and general election campaigns.

Both hearings will begin at 10 a.m. in the FEC’s 9th floor hearing room in Washington, DC. The address is 999 E Street, NW.

This is the second public hearing regarding the Commission’s proposed member regulations. Since the first hearing, the Commission has published a second Notice of Proposed Rulemaking (NPRM) that lays out a number of additional revisions to the current regulations. The second NPRM was published in the December 16, 1998, Federal Register (63 FR 69224), and a summary of the changes appeared in the January 1999 Record on page 10.

The public financing hearing will address a number of proposed changes to the Commission’s
Anyone wishing to testify must submit written comments and a request to testify by March 1. Written comments and requests to testify should be addressed to Susan E. Propper, Assistant General Counsel. Comments and requests to testify may be submitted by:

- Mailing them to the Federal Election Commission, 999 E Street, NW, Washington, DC 20463;
- Faxing them to 202/219-3923, with a copy mailed to the preceding address to ensure legibility; or
- E-mailing them to members@fec.gov (for member regulations) or publicfund@fec.gov (for public financing regulations). Electronic submissions must include the commenter’s full name, e-mail address and postal mail address.

FEC Seeks Comments on Petition Urging Change to “Express Advocacy” Rules

On January 28, the Commission approved for public comment a Notice of Availability on a rulemaking petition that addresses the definition of “express advocacy” found in the Commission’s rules at 11 CFR 100.22. The petition for rulemaking was submitted by James Bopp Jr. on behalf of the James Madison Center for Free Speech in February 3, 1998, Record, p. 6.

The petitioners urge the Commission to revise this definition to conform with the decisions in Maine Right to Life Committee (MRLC) v. FEC and Right to Life of Dutchess County v. FEC. In those cases, district courts found that paragraph 100.22(b) was invalid because it expanded the definition of express advocacy beyond the Supreme Court’s interpretation of it in Buckley v. Valeo. In the MRLC case, the U.S. Court of Appeals for the First Circuit upheld the lower court ruling, and the U.S. Supreme Court declined to hear the case on appeal.

The challenged paragraph defines express advocacy as any communication that, when taken as a whole and with limited reference to external events, can only be interpreted by a reasonable person as expressly advocating the election or defeat of a clearly identified candidate or group of candidates. The petitioners—and the courts in the two cases mentioned above—argue that the express advocacy standard requires words specifically calling for the election or defeat of a named candidate, as expressed in Buckley v. Valeo.

The express advocacy standard determines whether certain communications qualify as independent expenditures, whether independent communications by corporations and labor organizations are permitted and whether a communication requires a disclaimer. The Notice of Availability seeks comments on whether the FEC should initiate a rulemaking in response to the petition. The Commission routinely provides an opportunity for comments on rulemaking petitions before the agency considers their merits.

This particular petition is similar to a petition filed by the James Madison Center for Free Speech in late 1997. The Commission declined to open a rulemaking in response to that petition. See the April 1998 Record, p. 6.

The notice, published in the February 3 Federal Register (64 FR 5200), is available from the following sources:
- Public Records Office at 800/424-9530 (press 3); and

Public comments must be submitted in either written or electronic form to Susan E. Propper, Assistant General Counsel. Written comments should be mailed to the Federal Election Commission, 999 E St.,...
NW, Washington, DC 20463. Faxed comments should be transmitted to 202/219-3923, with a copy mailed to the preceding address to ensure legibility. Comments also may be sent by e-mail to expressad@fec.gov. Electronic submissions must include the commenter’s full name, e-mail address and postal mail address.

### Status of FEC Regulations

This table provides a status report on current projects. The *Record* will periodically publish a list of regulations projects and their status.

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definition of Express Advocacy (11 CFR 100.22)</td>
<td>Notice of Availability on Rulemaking Petition published. Comments due March 5.</td>
</tr>
<tr>
<td>Definition of Member (11 CFR 100.8 and 114.1)</td>
<td>Public Hearing scheduled for March 17.</td>
</tr>
<tr>
<td>Party Committee Coordinated and Independent Expenditures (11 CFR 100.23, 109.1 and 110.7)</td>
<td>On hold.</td>
</tr>
<tr>
<td>Recordkeeping and Reporting (11 CFR Parts 102, 104 and 108)</td>
<td>Draft Final Rules being revised by FEC staff.</td>
</tr>
<tr>
<td>Definition of Personal Funds for Contributors (11 CFR 110.10)</td>
<td>Draft Notice of Proposed Rulemaking being drafted by FEC staff.</td>
</tr>
<tr>
<td>Limited Liability Companies</td>
<td>Notice of Proposed Rulemaking comment deadline was February 1.</td>
</tr>
<tr>
<td>Compliance Procedures (11 CFR Part 111)</td>
<td>PwC report recommendations being reviewed in conjunction with drafting of final rules.*</td>
</tr>
<tr>
<td>Allocation of Travel Expenses (11 CFR 106.3)</td>
<td>Draft Notice of Proposed Rulemaking being drafted by FEC staff.</td>
</tr>
<tr>
<td>Definition of Major Purpose (11 CFR 100.5)</td>
<td>On hold.</td>
</tr>
<tr>
<td>Loans to Political Committees by Brokerage Firms</td>
<td>On hold.</td>
</tr>
</tbody>
</table>

* See article about PricewaterhouseCoopers (PwC) report on page 7.
### Statistics

**Party Committee Fundraising Continues Climb**

Democratic and Republican party committees reported raising $628 million between January 1, 1997, and November 23, 1998. The total represents a 41 percent increase over the total amount raised during the same reporting period of the last mid-term election cycle, in 1994. The figure includes both hard and soft money.

Republican committees led the fundraising race with $385 million in receipts—$273.6 million in federal contributions and $111.3 million in soft money donations. The totals represent a 22 percent increase in hard money receipts and a 112 percent increase in soft money receipts from 1994. Democratic committees raised $243 million—$153.4 million in federal contributions and $89.4 million in soft money donations. The Democrats posted a 27 percent increase in hard money receipts and an 82 percent increase in soft money donations when compared to 1994.

Republicans reported spending $265.4 million in federal funds, up $51 million from 1994; Democrats reported spending $147.6 million, up $32.3 million from 1994. Without counting soft money transfers between party committees, the Republicans reported $106.9 million in nonfederal disbursements and the Democrats reported $87.8 million.

This article and the accompanying graphs are based on data taken from a January 26 news release. The release is available at the following places.

- FEC home page (http://www.fec.gov; select “News Releases and Media Advisories”)
- FEC Public Records and Press offices (800/424-9530)
- FEC Faxline (202/501-3413, document 609)

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The Republican National Committee, National Republican Senatorial Committee and National Republican Congressional Committee spent $106.86 million in nonfederal disbursements through the post-general reporting period. The Democratic National Committee, Democratic National Senatorial Committee and Democratic Congressional Campaign Committee spent $87.81 million in nonfederal disbursements for the same period.

<table>
<thead>
<tr>
<th></th>
<th>Transfers to State Parties</th>
<th>Contributions to State/Local Candidates</th>
<th>Nonfederal Share of Joint (Federal/Nonfederal) Activity</th>
<th>Other disbursements (includes transfers to other national party operations, building fund support, loan repayments and other nonfederal expenses)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DNC</strong></td>
<td>103.4</td>
<td>33</td>
<td>30.1</td>
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<tr>
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<td>30.1</td>
<td>36.9</td>
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<tr>
<td><strong>DSCC</strong></td>
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<td>3</td>
<td>30.1</td>
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<tr>
<td><strong>NRSC</strong></td>
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<td>30.1</td>
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<td>36.9</td>
</tr>
</tbody>
</table>

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- FEC home page (http://www.fec.gov; select “News Releases and Media Advisories”)
- FEC Public Records and Press offices (800/424-9530)
- FEC Faxline (202/501-3413, document 609)
Federal Disbursements by Party Committees  
January 1, 1997 — November 23, 1998

Republican party committees spent $265.44 million from their federal accounts through the post-general reporting period. Democratic party committees spent $147.65 million from their federal accounts for the same period.

Independent Expenditures
Coordinated Expenditures
Contributions
Other disbursements (includes administrative expenses, generic activity, fundraising, loan repayments and other federal expenses)

Millions

<table>
<thead>
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<th>Democrats</th>
<th>Republicans</th>
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<tbody>
<tr>
<td>$0</td>
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<tr>
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<tr>
<td>$250</td>
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</tr>
<tr>
<td>$300</td>
<td>$247.15</td>
</tr>
</tbody>
</table>

Statistics continued on page 11

Advisory Opinions

AO 1998-26
Loan Repayment by Contested Election Entity to Principal Campaign Committee

The Louisiana Contested Election Trust Fund, an entity established to raise and spend funds to defend against a challenge to Senator Mary Landrieu’s 1996 Senate victory, may repay Ms. Landrieu’s principal campaign committee the remaining $97,000 it had borrowed during spring 1997.

The Trust Fund borrowed $122,000 from The Friends of Mary Landrieu Committee (Landrieu Committee), Ms. Landrieu’s principal campaign committee for re-election in 2002, to defend against the challenge to the results of the 1996 general election, brought by her opponent, Woody Jenkins. The Trust Fund has paid back part of the loan, but still owes $97,000. It plans to borrow that sum from a New Orleans bank (where it has a $150,000 line of credit secured by Ms. Landrieu), repay the Landrieu Committee and raise funds from individuals to repay the bank.

Commission regulations define “contribution” and “expenditure” to include any gift, loan or payment of money or anything of value for the purpose of influencing a federal election. But the regulations make an exception for payments made with respect to a vote recount or a contested federal election. 11 CFR 100.7(a)(1), 100.8(a)(1), 100.7(b)(20) and 100.8(b)(20). In these cases, donations may exceed the contribution limits, but they still cannot come from certain prohibited sources—namely corporations, national banks, labor organizations or foreign nationals. 2 U.S.C. §441a(a)(1)-(3).

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Advisory Opinions
(continued from page 5)

When a candidate sets up a separate entity to raise and spend funds to defend against an election challenge, the receipts and disbursements are not considered contributions or expenditures, and the entity does not have to report as a political committee. In this case, however, the Trust Fund has registered and files reports with the Commission. Because the entity’s purpose is limited to financing Ms. Landrieu’s defense against the vote challenge, the Trust Fund may accept donations in excess of the limits, but it may not accept the above-cited prohibited contributions.

As long as the Trust Fund has not accepted and retained funds from prohibited sources, the $97,000 loan repayment is permissible as is the acceptance of the repayment by the Landrieu Committee. Because the Landrieu Committee initially made the loan from its pool of contributions and not from donations raised expressly for funding the '96 election challenge, it does not have to segregate the loan repayment receipts in a special account and may use the funds to influence federal elections.

The Trust Fund must be sure that it does not use any funds that exceed the contribution limits to make contributions or expenditures in connection with federal elections.

The Commission has made clear that a state political party can qualify as a state party committee without an affiliation with any national political party. The state party’s candidate must qualify as a candidate under FEC regulations in order for the party to satisfy the second requirement.

The Hawaii party meets both requirements. In addressing the first requirement, the party’s bylaws set out a comprehensive organizational structure for the party from the statewide level down through local levels. These bylaws do indeed delineate activity commensurate with the day-to-day functions and operations of a political party on the state level.

The second requirement of ballot access for a federal candidate also has been satisfied. The party’s 1992 federal candidate, Linda Martin, attained ballot access and satisfied FEC requirements for establishing herself as a federal candidate under 2 U.S.C. §431(2). It makes no difference that Ms. Martin was a bona fide candidate more than six years ago because the party continued to pursue its political objectives through the 1997-1998 election cycle, placing candidates on the ballot for several local offices.

Date Issued: January 29, 1999; Length: 4 pages. ♦

Advisory Opinion Requests
Advisory opinion requests are available for review and comment in the Public Records Office.

AOR 1999-1
Use of campaign funds to pay salary to candidate (Mark Greene, January 19, 1999; 8 pages)

AOR 1999-2
Use of corporate treasury funds to provide meals to employees attending candidate forums (Premera Blue Cross, January 21, 1999; 3 pages) ♦

AO 1998-27
Status of State Party as State Committee of Political Party

The Hawaii Green Party Coordinating Committee meets both of the Commission’s requirements for state committee status.

The Federal Election Campaign Act (the Act) defines a state committee as “the organization which, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of such political party at the State level, as determined by the Commission.” 2 U.S.C. §431(15).

The definition of a state committee requires the existence of a political party. A political party is “an association, committee, or organization which nominates a candidate for election to any Federal office whose name appears on the election ballot as the candidate of such association, committee, or organization.” 2 U.S.C. §431(16).

In a number of advisory opinions, the Commission has identified two requirements necessary for state political committee status. First, the organization must have a state affiliate agreement that “delineates activities commensurate with the day-to-day operation” of a party at a state level. Second, the state affiliate must gain ballot access for its Presidential and other federal candidates. See AOs 1998-24, 1998-23, 1997-29, 1997-7, 1997-3 and 1996-51.

The Commission has determined that the Hawaii Green Party Coordinating Committee meets both requirements. In addressing the first requirement, the party’s bylaws set out a comprehensive organizational structure for the party from the statewide level down through local levels. These bylaws do indeed delineate activity commensurate with the day-to-day functions and operations of a political party on the state level.

The second requirement of ballot access for a federal candidate also has been satisfied. The party’s 1992 federal candidate, Linda Martin, attained ballot access and satisfied FEC requirements for establishing

Perot '96 Repayment Reduced

The FEC has determined that Perot ’96 must repay the U.S. Treasury $1,706,915 it received in public funding during the 1996 Presidential election. This figure is approximately $600,000 less than the Commission’s original repayment determination.

After challenging the Commission’s original repayment determination of $2,310,127, Perot ’96 received an oral hearing before the Commission. The committee challenged the repayment determination on two bases. First, because the committee was unable to terminate in April 1998, as it had
March 1999

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expected, it needed more funds to pay winding-down costs. Second, the committee argued that $1,447,000 in litigation expenses were qualified campaign expenses and should be reflected in its Statement of Net Outstanding Qualified Campaign Expenses.

The Commission allowed the additional funds for winding-down costs, but again rejected Perot ‘96’s claim that its litigation expenses were qualified campaign expenses. See the February 1998 Record, p. 1. The Commission found that the litigation expenses—for two lawsuits filed by the committee—were not incurred in furtherance of the 1996 general election and were not incurred prior to the close of the expenditure report period. 11 CFR 9002.11(a)(1) and (2). The lawsuits challenged the Commission on Presidential Debates and the Republican and Democratic national committees. See these Record issues: November 1996, p. 1, and June 1998, p. 3. 

Compliance

MUR 4834
Facilitating Impermissible Contribution Results in Civil Penalty

Howard Glicken has paid a $40,000 civil penalty for knowingly and willfully soliciting a $20,000 contribution from a foreign national and causing a foreign contribution to be falsely made in the name of a U.S. citizen.

Mr. Glicken solicited the contribution from Thomas Kramer in April 1993 and knew at the time that Mr. Kramer was a German national and that foreign nationals are prohibited from making contributions in elections in the United States. Mr. Glicken told Mr. Kramer that he should have someone else write the check to the DSCC and then reimburse that person. Subsequently, Mr. Glicken was present when Mr. Kramer asked his secretary to write a $20,000 contribution check, which the DSCC received a few days after it was made. Mr. Glicken knew that Mr. Kramer reimbursed his secretary for the full amount of the check.

It is unlawful for a foreign national to make contributions in connection with any election, either directly or through another person. Further, it is unlawful for any person to solicit, accept or receive a contribution from a foreign national. 2 U.S.C. §441e. It is also unlawful for any person to make a contribution in the name of another. 2 U.S.C. §441f. In this case, Mr. Glicken solicited a contribution from a foreign national to the DSCC and caused a contribution to be made to the DSCC in the name of another, both in knowing and willful violation of the Federal Election Campaign Act (the Act).

This compliance matter was referred to the FEC by the Department of Justice. The Commission entered into a conciliation agreement with Mr. Glicken after finding reason to believe that he had violated the Act.

Information

Independent Audit Report On FEC Submitted to Congress

An independent audit of the FEC, conducted over the past eight months by PricewaterhouseCoopers, LLP (PwC), determined that the Commission executes its duties “…without partisan bias,” and addressed the necessity for Congress to authorize mandatory electronic filing of campaign reports. The audit was requested by Congress in 1997.

Findings

In the report’s Executive Summary, the PwC auditors state: “The FEC is basically a competently managed organization with a skilled and motivated staff, although it has its shortcomings. The ability of the FEC to adapt to the changing election environment, however, has been hindered by the FECA [Federal Election Campaign Act] statute itself, escalating campaign finance disclosure and compliance workloads, and an organizational culture that has attempted incremental change in a deadline-driven environment stretched by limited resources.”

Among specific FEC strengths, the independent audit report mentions that:

• Disclosure and compliance activities are executed without a partisan bias. The report gives an “unqualified yes” to the question: “Are FEC programs conducted in a non-partisan, ethical, and independent manner?”

• The FEC “…places a premium on facilitating voluntary compliance, and the regulated community values the products and services designed and employed by the FEC to enhance this voluntary compliance.”

Recommendations

With regard to the future, the PwC audit report states:

• “The Congress and the FEC need to initiate actions that will eventually allow the FEC to shift some resources from its disclosure activities to its compliance programs by the following means: develop a comprehensive, mandatory electronic data filing system for the major filers in conjunction with a significant business process reengineering throughout the FEC;

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redesign disclosure processes (using industry standard software) and realign organizational units to improve processing time, accuracy, and cost.”

• The FEC should be authorized to move “…non-deliberate and straightforward reporting violations, such as failure to meet reporting deadlines, away from the enforcement process and into an administrative fine system to allow enforcement resources to handle more significant violations.”

“The FEC faces an increasing and volatile workload with the year 2000 election cycle that features a non-incumbent Presidential election. …Depending on the number of Presidential candidate committees, the size of the enforcement caseload and the Commission desire to increase case activation rates, additional compliance resources in FY2000 may be warranted above normal inflation adjusted levels. FY2000 appropriations should be conditioned on the agency’s continued progress in implementing opportunities to increase productivity in its disclosure and compliance programs.”

FEC Response

The official response of the Commission, published as Section 6 of the report, draws attention to PwC’s recognition of FEC accomplishments, the influence of outside factors on FEC operations and the need for legislative change in order to accomplish some of the PwC recommendations. Additionally, the FEC’s formal response summarizes and endorses the basic themes of PwC’s recommendations.

The report is available at the General Accounting Office’s web site (http://www.gao.gov/special.pubs/publist.htm) and from the FEC’s Public Records Office by calling 800/424-9530 (press 3) or 202/694-1120.

FEC Conducts Monthly Roundtable Sessions

The FEC has begun conducting monthly roundtable sessions for the regulated community at its offices in Washington. The roundtable sessions, limited to 10 participants per session, focus on a range of topics. See the chart below for dates and topics.

Registration is $25 and will be accepted on a first-come, first-served basis. Please call the FEC before registering to be sure that openings remain in the session of your choice. Prepayment is required. The registration form is available at the FEC’s web site (http://www.fec.gov) and from Faxline, the FEC’s automated fax system (202/501-3413, request document 590). For more information, call 800/424-9530 (press 1) or 202/694-1100.

<table>
<thead>
<tr>
<th>Date</th>
<th>Subject</th>
<th>Intended Audience</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 7</td>
<td>FEC Rules on Use of the Internet to Raise Funds (Code #499)</td>
<td>Candidates, Political Party Staff, Nonconnected PACs</td>
</tr>
<tr>
<td>May 5</td>
<td>Fundraising Through Payroll Deductions and Combined Dues/PAC Solicitations (Code #599)</td>
<td>Corporate/Labor/Trade PAC Staff, Lawyers, Accountants and Consultants to Above PACs</td>
</tr>
</tbody>
</table>

FEC Faxline Menu

FEC Faxline documents may be ordered 24 hours a day, 7 days a week, by calling 202/501-3413 on a touch tone phone. You will be asked for the numbers of the documents you want, your fax number and your telephone number. The documents will be faxed shortly thereafter.

| Disclosure |
|------------|------------------------------------------------|
| 510. Personnel Vacancy Announcements |
| 511. Freedom of Information Act Requesters’ Guide |
| 512. Legal Opportunities at the FEC |
| 513. 1998 Legislative Recommendation |

| Disclosure |
|------------|------------------------------------------------|
| 521. Guide to Researching Public Records |
| 522. Accessibility of Public Records Office |
| 523. Federal/State Records Offices |
| 524. Using FEC Campaign Finance Information |
| 525. State Computer Access to FEC Data |
| 526. Direct Access Program (DAP) |
| 527. Sale and Use of Campaign Information |
| 529. Selected Political Party Organizations and Addresses |
| 530. Internet Access to the FEC |
| 531. Downloadable Databases via the Internet |
1996 Presidential
651. 1996 Presidential Primary Dates
652. Selected 1996 Campaign Names and Addresses
653. Selected 1996 Campaign Finance Figures
654. 1996 Public Funding Certifications and Payments
655. 1996 Presidential General Election Ballots
656. 1996 Presidential General Election Results

Office of Election Administration
701. List of Reports Available
702. Voting Accessibility for the Elderly and Handicapped Act
703. National Voter Registration Act Regulations
704. National Voter Registration Act of 1993
705. The Electoral College
706. Organizational Structure of the American Election System
707. Primary Functions of an Election System

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801. Form 1, Statement of Organization
802. Form 2, Statement of Candidacy
803. Form 3 and 3Z, Report for an Authorized Committee
804. Form 3X, Report for Other Than an Authorized Committee
805. Form 5, Report of Independent Expenditures
806. Form 6, 48-Hour Notice of Contributions/Loans Received
807. Form 7, Report of Communication Costs
808. Form 8, Debt Settlement Plan
809. Form 1M, Notification of Multicandidate Status

Schedules
825. Schedule A, Itemized Receipts
826. Schedule B, Itemized Disbursements
827. Schedules C and C-1, Loans
828. Schedule D, Debts and Obligations
829. Schedule E, Itemized Independent Expenditures
830. Schedule F, Itemized Coordinated Expenditures
831. Schedules H1 – H4, Allocation
832. Schedule I, Aggregate Page Nonfederal Accounts

Regulations (11 CFR Parts 100-201)
100. Part 100, Scope and Definitions
1007. Part 100.7, Contribution
1008. Part 100.8, Expenditure
101. Part 101, Candidate Status and Designations
1012. Part 102, Registration, Organization and Recordkeeping by Political Committees
1021. Part 102.17, Joint Fundraising by Committees Other Than SSFs
103. Part 103, Campaign Depositories
104. Part 104, Reports by Political Committees
1047. Part 104.7, Best Efforts
105. Part 105, Document Filing
106. Part 106, Allocations of Candidate and Committee Activities
107. Part 107, Presidential Nominating Convention, Registration and Reports
108. Part 108, Filing Copies of Reports and Statements with State Offices
109. Part 109, Independent Expenditures
110. Part 110, Contribution and Expenditure Limitations and Prohibitions
1101. Part 110.1, Contributions by Persons Other Than Multicandidate Political Committees
1102. Part 110.2, Contributions by Multicandidate Committees
1103. Part 110.3, Contribution Limitations for Affiliated Committees and Political Party Committees; Transfers
1104. Part 110.4, Prohibited Contributions
1105. Part 110.5, Annual Contribution Limitation for Individuals
1106. Part 110.6, Earmarked Contributions
1107. Part 110.7, Party Committee Expenditure Limitations
1108. Part 110.8, Presidential Candidate Expenditure Limitations
1109. Part 110.9, Miscellaneous Provisions
1110. Part 110.10, Expenditures by Candidates
1111. Part 110.11, Communications; Advertising
1112. Part 110.12, Candidate Appearances on Public Educational Institution Premises

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Information
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1113. Part 110.13, Nonpartisan Candidate Debates
1114. Part 110.14, Contributions to and Expenditures by Delegates and Delegate Committees
111. Part 111, Compliance Procedure
112. Part 112, Advisory Opinions
113. Part 113, Excess Campaign Funds and Funds Donated to Support Federal Officeholder Activities
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227. Electronic Filing of Reports by Political Committees
228. Coordinated and Independent Expenditures by Party Committees
229. Definition of “Member” of a Membership Association
230. Prohibited and Excessive Contributions; “Soft Money”
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234. Electronic Filing of Reports by Presidential Candidates
235. Public Financing of Presidential Primary and General Election Candidates
236. Treatment of Limited Liability Companies under the Federal Election Campaign Act

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431. Section 431 442. Section 442
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434. Section 434 453. Section 453
437. Section 437 454. Section 454
4377. Section 437g 455. Section 455
438. Section 438
439. Section 439
441. Section 441
4411. Section 441a
4412. Section 441b

FEC Conference Schedule

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<thead>
<tr>
<th>Type</th>
<th>Place</th>
<th>Date</th>
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<tr>
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<td>Washington, DC</td>
<td>April 22-23, 1998</td>
</tr>
<tr>
<td>Membership and Trade Association Conference</td>
<td>Washington, DC</td>
<td>May-June 1998</td>
</tr>
<tr>
<td>Partnership Conference</td>
<td>Washington, DC</td>
<td>July 1999</td>
</tr>
<tr>
<td>Regional Conference (Includes candidate, corporate/labor and party workshops)</td>
<td>Chicago, IL</td>
<td>September 1999</td>
</tr>
<tr>
<td>Regional Conference (Includes candidate, corporate/labor and party workshops)</td>
<td>San Francisco, CA</td>
<td>November 1999</td>
</tr>
<tr>
<td>Candidate Conference</td>
<td>Washington, DC</td>
<td>February 2000</td>
</tr>
<tr>
<td>Regional Conference (Includes candidate, corporate/labor and party workshops)</td>
<td>Miami, FL</td>
<td>March 2000</td>
</tr>
<tr>
<td>Corporate and Labor Conference</td>
<td>Washington, DC</td>
<td>May 2000</td>
</tr>
<tr>
<td>Membership and Trade Association Conference</td>
<td>Washington, DC</td>
<td>June 2000</td>
</tr>
</tbody>
</table>

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9701-29. AOs 1997-1 through 1997-29
9601-52. AOs 1996-1 through 1996-52
9501-49. AOs 1995-1 through 1995-49
9401-40. AOs 1994-1 through 1994-40
9301-25. AOs 1993-1 through 1993-25
9201-44. AOs 1992-1 through 1992-44
9101-40. AOs 1991-1 through 1991-40
9001-40. AOs 1990-1 through 1990-40
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Year-End PAC Count Inches Up

The FEC’s semi-annual PAC count shows that the number of PACs has increased slightly since the last count in July 1998. The table at right shows the midyear and year-end PAC figures since 1991.

To see a complete PAC tabulation dating back to 1974, visit the FEC’s web site—http://www.fec.gov—or request a copy of the FEC’s February 12 new release from either the Public Records or Press offices by calling 800/424-9530.

Midyear and Year-End PAC Counts, December 1991 — December 1998

<table>
<thead>
<tr>
<th></th>
<th>Corporate</th>
<th>Labor</th>
<th>Trade/Member/Cooperative</th>
<th>Corp. w/o Capital Stock</th>
<th>Non-connected</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dec. ’91</td>
<td>1,738</td>
<td>338</td>
<td>742</td>
<td>57</td>
<td>136</td>
<td>1,083</td>
</tr>
<tr>
<td>Jul. ’92</td>
<td>1,731</td>
<td>344</td>
<td>759</td>
<td>56</td>
<td>144</td>
<td>1,091</td>
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<tr>
<td>Dec. ’92</td>
<td>1,735</td>
<td>347</td>
<td>770</td>
<td>56</td>
<td>142</td>
<td>1,145</td>
</tr>
<tr>
<td>Jul. ’93</td>
<td>1,715</td>
<td>338</td>
<td>767</td>
<td>55</td>
<td>139</td>
<td>1,011</td>
</tr>
<tr>
<td>Dec. ’93</td>
<td>1,789</td>
<td>337</td>
<td>761</td>
<td>56</td>
<td>146</td>
<td>1,121</td>
</tr>
<tr>
<td>Jul. ’94</td>
<td>1,666</td>
<td>336</td>
<td>777</td>
<td>53</td>
<td>138</td>
<td>963</td>
</tr>
<tr>
<td>Dec. ’94</td>
<td>1,660</td>
<td>333</td>
<td>792</td>
<td>53</td>
<td>136</td>
<td>980</td>
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<td>Jul. ’95</td>
<td>1,670</td>
<td>334</td>
<td>804</td>
<td>43</td>
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<td>1,002</td>
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<td>Dec. ’95</td>
<td>1,674</td>
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<td>815</td>
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<td>129</td>
<td>1,020</td>
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<tr>
<td>Jul. ’96</td>
<td>1,645</td>
<td>332</td>
<td>829</td>
<td>43</td>
<td>126</td>
<td>1,058</td>
</tr>
<tr>
<td>Dec. ’96</td>
<td>1,642</td>
<td>332</td>
<td>838</td>
<td>41</td>
<td>123</td>
<td>1,103</td>
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<td>Jul. ’97</td>
<td>1,602</td>
<td>332</td>
<td>826</td>
<td>41</td>
<td>118</td>
<td>953</td>
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<td>Dec. ’97</td>
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<td>322</td>
<td>825</td>
<td>42</td>
<td>117</td>
<td>931</td>
</tr>
<tr>
<td>Jul. ’98</td>
<td>1,565</td>
<td>325</td>
<td>820</td>
<td>43</td>
<td>112</td>
<td>897</td>
</tr>
<tr>
<td>Dec. ’98</td>
<td>1,567</td>
<td>321</td>
<td>821</td>
<td>39</td>
<td>115</td>
<td>935</td>
</tr>
</tbody>
</table>

\[1\] Nonconnected PACs must use their own funds to pay fundraising and administrative expenses, while the other categories of PACs have corporate or labor “connected organizations” that are permitted to pay those expenses for their PACs. On the other hand, nonconnected PACs may solicit contributions from the general public, while solicitations by corporate and labor PACs are restricted.

\[2\] During the first six months of 1997, 227 PACs were administratively terminated because of inactivity.

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