



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: THE COMMISSION
STAFF DIRECTOR
GENERAL COUNSEL
FEC PRESS OFFICE
FEC DISCLOSURE

FROM: OFFICE OF THE COMMISSION SECRETARY

DATE: June 27, 2005

SUBJECT: *Ex Parte* Contact Regarding the Final Rules
and Explanation and Justification on Payroll
Deductions by Member Corporations for
Contributions to a Trade Association's
Separate Segregated Fund (11 CFR Part 114)

MWD

Attached is a memorandum from Chairman Thomas regarding the above-captioned matter.

Attachment




FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OFFICE OF THE CHAIRMAN

June 27, 2005

MEMORANDUM

TO: Mary W. Dove
Commission Secretary

FROM: Scott E. Thomas
Chairman 

SUBJECT: *Ex parte* contact

On June 22, 2005, Larry Gold called. He indicated he had read my alternative draft for the final rule and E & J regarding use of payroll deduction for trade association PAC fundraising. He noted I had not made mention of the fact that the OGC draft labels the use of payroll deduction at a member corporation as something other than a method of facilitating the making of contributions. He said the legislative history, regulation history, as well as Commission precedent all make clear that payroll deduction is to be considered a method of facilitating the making of contributions.