

Record

May 2009

Federal Election Commission

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Paper distribution of the FEC Record will end in July 2009.

See page 3 for details.

Reporting

FEC Form 3L Due May 20

On May 20, 2009, certain Leadership PACs, Presidential campaigns and political party committees may be required to file FEC Form 3L for the first time. Under the new lobbyist bundling disclosure rules, “reporting committees” (authorized committees, Leadership PACs and political party committees) must disclose certain information about lobbyists/registrants and lobbyist/registrant PACs that forward, or are credited with raising, two or more bundled contributions aggregating in excess of \$16,000 during a specific covered period. See 11 CFR 104.22(a)(6). Recordkeeping requirements went into effect on March 19, 2009, and compliance with the reporting requirements is required after May 17, 2009.

Committees file their FEC Form 3L, as necessary, on the same schedule as they file FEC Form 3 or 3X. Committees required to file Form 3L can elect to file Form 3L monthly or quarterly. 11 CFR 104.22(a)(5). Leadership PACs and party committees that are Form 3L quarterly filers are required to file only semiannually during a non-election year, while candidate committees that are Form 3L quarterly filers are required to file quarterly. For Form 3L monthly fil-

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Advisory Opinions

AO 2009-01

Renewal of Socialist Workers Party’s Partial Disclosure Exemption

The Federal Election Commission has renewed the partial reporting exemption for the Socialist Workers Party, the Socialist Workers Party National Campaign Committee, other Socialist Workers Party committees and authorized committees of Socialist Workers Party federal candidates (collectively “the SWP” or “SWP committees”) until December 31, 2012. The Commission has extended the exemption for the next four years, as opposed to the six years that it has granted in previous advisory opinions on this matter.

Background

The Federal Election Campaign Act (the Act) requires that political committees file reports with the Commission that identify individuals and other persons who make contributions over \$200 during the calendar year. 2 U.S.C. §§434(b)(3), (5) and (6). According to FEC regulations, identification, in the case of an individual, includes his or

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Reporting

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ers, the first Form 3L will be due on May 20, 2009, if they received two or more bundled contributions that aggregate more than \$16,000 from March 19 through April 30, 2009. (For Form 3L quarterly filers that received two or more bundled contributions that aggregate more than \$16,000 from March 19 through June 30, 2009, the first Form 3L will be due on July 15, 2009, for candidate committees and on July 31, 2009, for Leadership PACs and party committees.)

Monthly filing reporting committees wishing to change their lobbyist bundling disclosure from monthly

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to quarterly must first notify the Commission in writing and will receive a letter indicating the Commission's acknowledgment of the request. Electronic filers must file this request electronically. A reporting committee may change its Form 3L filing frequency only once in a calendar year. 11 CFR 104.22(a)(5)(iv).

Disclosure Requirements for Reporting Committees

Reporting committees meeting the threshold for the lobbyist bundling disclosure must use FEC Form 3L (Report of Contributions Bundled by Lobbyists/Registrants and Lobbyist/Registrant PACs). The lobbyist bundling disclosure includes:

- Name of each lobbyist/registrant or lobbyist/registrant PAC;
- Address of each lobbyist/registrant or lobbyist/registrant PAC;
- Employer of each lobbyist/registrant (if an individual);
- The aggregate amount of bundled contributions forwarded by or received and credited to each lobbyist/registrant or lobbyist/registrant PAC by the reporting committee during the covered period; and
- The aggregate amount of refunds of bundled contributions returned to each lobbyist/registrant or lobbyist/registrant PAC by the reporting committee during the covered period. 11 CFR 104.22(b)(1).

For more information about these filing requirements, see the March 2009 issue of the *Record*, page 1. Electronic filers are required to file FEC Form 3L electronically. A new release of FECFile is available from the FEC. Consult the electronic filing page at <http://www.fec.gov/electfil/electron.shtml> for up-to-date information. A paper version of FEC Form 3L is available for download and printing on the FEC website at <http://www.fec.gov/info/forms.shtml>.

—Elizabeth Kurland

Advisory Opinions

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her full name, mailing address, occupation and the name of his or her employer.¹

In *Buckley v. Valeo*, 424 U.S. 1 (1976), the Supreme Court recognized that, under certain circumstances, the Act's disclosure requirements as applied to a minor party would be unconstitutional because the threat to their First Amendment rights resulting from disclosure would outweigh the interest in disclosure. According to the Court's opinion, "minor parties must be allowed sufficient flexibility in the proof of injury to assure a fair consideration of their claim [for a reporting exemption]... The evidence offered need only show a reasonable probability that the compelled disclosure of a party's contributors' names will subject them to threats, harassment, or reprisals from either the government or private parties." 424 U.S. at 74.

The SWP was first granted a partial reporting exemption in 1979 in a consent decree that resolved *Socialist Workers 1974 National Campaign Committee v. Federal Election Commission*, Civil Action No. 74-1338 (D.D.C. 1979). In that case, the SWP brought an action for declaratory, injunctive and affirmative relief, alleging that specific disclosure sections of the Act deprived the SWP and their supporters of their First Amendment rights because of the likelihood of harassment resulting from mandatory disclosure of contributors and vendors. The consent

¹ 11 CFR 100.12 includes this definition for an individual, and also defines "identification" for any other person as the person's full name and address.

decree exempted the SWP from the Act's requirements to disclose the identification of contributors to the SWP (including lenders, endorsers and guarantors of loans) and the identification of persons receiving expenditures from the SWP. At the same time, however, the decree required the SWP to maintain records in accordance with the Act and to file reports in a timely manner.

SWP's first partial disclosure exemption was extended through 1984. The decree established a

procedure for the SWP committees to apply for a renewal of the exemptions. The court granted a renewal in 1985; however the SWP missed the deadline for reapplication for the exemption through the courts in 1988.² Subsequently, they have

² The 1985 agreement also exempted the SWP from reporting the identification of persons providing rebates, refunds or other offsets to operating expenditures and persons providing any dividends, interest or other receipts.

sought extension of this exemption through the FEC's advisory opinion process, which has renewed SWP's partial reporting exemption since 1990 (see AOs 2003-02, 1996-46 and 1990-13). Each of the FEC's prior renewals covered periods of approximately six years up until December 31, 2008.

Request for Renewal

In AOs 2003-02, 1996-46 and 1990-13, the Commission noted that, in granting and renewing the exemption, it considered both current and historical harassment. These renewals were based, in part, on the evidence of harassment since 1985, 1990 and 1997, respectively. The very nature of the periodic extensions indicates that, after a number of years, it is necessary to reassess the SWP's situation to see if the reasonable probability of harassment still exists.

The current request for renewal demonstrates that the SWP has been a minor party since it was established. No SWP candidate has ever been elected to public office in a partisan election. Data from the 2004, 2006 and 2008 elections show very low vote totals for the SWP Presidential and other federal candidates. FEC records and facts provided by the SWP also show a low level of financial activity by the SWP political committees. Furthermore, unlike committees of several other minor parties, the SWP National Campaign Committee has never qualified, or even applied, for national committee status.

The SWP's request also must be evaluated in the context of the relationship between the SWP and various federal, state and local law enforcement authorities and private parties. The previous AOs extending the partial reporting exemption describe FBI activities targeted at disrupting SWP activities between 1941 and 1976 and also referred to statements made in affidavits sub-

No More Paper!

Electronic distribution of the FEC Record begins in July 2009

Beginning in July 2009, the FEC will no longer print and mail copies of its monthly newsletter, the *Record*, and will instead distribute it electronically. The *Record* will continue to be made available each month on the FEC web site at <http://www.fec.gov/pages/record.shtml>, and the FEC will notify all registered committees via e-mail each time a new issue is posted.

Individuals and organizations who are not registered with the Commission, but who would like to continue to receive the *Record*, can subscribe through FECMail to receive e-mail notification when a new issue is posted to the web site. Subscribing is easy. Simply visit our web site at <http://www.fec.gov/pages/record.shtml> and click on the link "Sign-up to receive an e-mail notification when a new issue of the *Record* is posted."

We appreciate your patience as we make this transition. Publishing the *Record* electronically, rather than on paper, will improve efficiency, conserve resources and provide more timely delivery to subscribers. As a service to readers who cannot access the publication on-line, we will offer copies through our automated fax system, Faxline, and will print and mail paper copies upon request. For more information, please contact the Information Division at 800/424-9530 or 202-694-1100.

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Advisory Opinions

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mitted by federal governmental officials in several agencies expressing the need for information about the SWP based on the officials' unfavorable perceptions of the SWP. The advisory opinions also discussed the statements of SWP workers and candidates and media reports, among other sources, describing incidents of private threats and acts of violence and vandalism, harassment by local police and difficulties with other governmental authorities experienced by the SWP and those associating with it from 1985 through 2002.

In addition, the recent request included numerous statements dated from late 2002 to 2008 attesting to incidents of harassment or intimidation that add to SWP's long history of harassment and intimidation. The statements provided by the requestor fall into the four following categories:

- Statements attesting to the fear that potential SWP supporters have of being identified as an SWP supporter;
- Statements and materials attesting to alleged hostility from private parties to SWP activities;
- Statements and materials attesting to alleged hostility from local government law enforcement sources to SWP activities; and
- Statements attesting to other alleged governmental intimidation.

Analysis

As a threshold issue, in applying the standard established by the court cases and court decrees described above, the Commission must determine whether the SWP continues to maintain its status as a minor party. See *Buckley*, 424 U.S. at 68-74. Based on the facts presented, the Commission concluded that, as evidenced by the low vote totals for SWP candidates, the lack of success in ballot access and the small

total amounts contributed to SWP committees, the SWP continues to maintain its status as a minor party.

Next, the Commission must weigh three factors in making its determination:

- The history of violence, harassment and threats against the SWP;
- Evidence of violence, harassment and threats since 2002; and
- How these factors balance against the governmental interest in disclosure by the SWP committees of the identifications of contributors and recipients of expenditures.

The Commission concluded that the long history of threats, violence and harassment against the SWP and its supporters still had some relevance and that the evidence covering the end of 2002 through 2008 indicated that there is still a reasonable probability that contributors to, and vendors doing business with, the SWP would face threats, harassment or reprisals if their identifications were disclosed. The Commission concluded that, due to the very small total amounts of contributions and the very low vote totals for its candidates in partisan elections, the activities of the SWP have little if any impact on federal elections and thus the governmental interest in obtaining the identifying information of contributors to and vendors doing business with the SWP continues to be outweighed by the reasonable probability of threats, harassment or reprisals resulting from such disclosure.

The Commission therefore granted the SWP committees a continuation of the partial reporting exemption. Although the evidence presented by the SWP demonstrated some continued incidents of violence and harassment since the granting of the last exemption renewal, the Commission concluded that those incidents appear to be of lesser magnitude than those referenced in court opinions and in prior advisory opinions granting the exemption. Thus,

the Commission granted a four-year, rather than a six-year, extension. The shorter exemption period will allow the Commission to reassess the conditions presented by requestors against the interest of disclosure at that time.

As provided since AO 1996-46, the partial reporting exemption requires the SWP to assign a code number to each individual or entity from whom it receives one or more contributions aggregating in excess of \$200 in a calendar year or applicable election cycle. That code number must be included in FEC reports filed by each committee in the same manner that full contributor identification would otherwise be disclosed. The committee's records must correlate each code number with the name and other identifying data of the contributor who is

2009 Combined Federal/State Disclosure and Election Directory Now Available

The 2009 edition of the *Combined Federal/State Disclosure and Election Directory* is now available on the Commission's web site (www.fec.gov). This directory identifies the federal and state agencies responsible for the disclosure of campaign finances, lobbying, personal finances, public financing, candidates on the ballot, election results, spending on state initiatives and other financial filings. The online edition is "clickable" and has active hyperlinks to the offices that are listed within the publication.

The *Directory* is available at <http://www.fec.gov/pubrec/cfsdd/cfsdd.shtml>. Printed editions of the *Directory* are expected to arrive in May. To order a copy, please contact the FEC's Public Disclosure Division at 800/434-9530 or 202/694-1120.

represented by that code in order to comply with the Act's recordkeeping requirements.

The SWP may submit a new advisory opinion request seeking a renewal of the exemption up to sixty days prior to December 31, 2012. If a request is submitted, the Commission will consider the factual information then presented as to harassment after December 31, 2008, or lack thereof, and will make a decision at that time as to renewal.

The partial reporting exemption will apply to the following sections of the Act: 2 U.S.C. §§434(b)(3) (receipts of a political committee), 434(b)(5) and (6) (expenditures and disbursements by a political committee), 434(e) (reporting by political committees), 434(f) (electioneering communication disclosure) and 434(g) (independent expenditure reporting). Please note that the SWP and the committees supporting SWP candidates must still comply with all other reporting obligations such as electronic filing and reporting their independent expenditures while omitting the names and identifications of contributors, donors and vendors.³ In addition, the Commission declined to rule on whether or not to grant an exemption from the new lobbyist bundling disclosure reporting requirements since the SWP has established that it has not and does not anticipate receiving such bundled contributions, thus rendering the question purely hypothetical. 2 U.S.C. §434(i) and 11 CFR 104.22.

The SWP committees must still comply with all of the remaining

requirements of the Act and Commission regulations.

Date Issued: March 20, 2009;

Length: 13 pages.

—Paola Pascual-Ferrá

AO 2009-02

Independent Expenditures by Single Member LLC

The True Patriot Network, LLC (TPN), a single natural person member limited liability company (LLC), may make independent expenditures subject to the limitations and disclosure requirements that apply to individuals.

Background

TPN is a limited liability company organized under the laws of the State of Washington. Nicolas Hanauer is the sole member and manager of TPN. As TPN's manager, he has the "sole and exclusive right" to manage TPN's affairs.

TPN plans to expand its activities to include communications that influence federal elections. Such communications would endorse and urge support for specific federal candidates and officeholders who share TPN's principles and ideals. In undertaking these activities, TPN states that it will not coordinate with federal candidates or party committees.

Analysis

TPN may make independent expenditures, subject to the limitations and disclosure requirements that apply to individuals. An LLC is treated as a person under the Federal Election Campaign Act (the Act). 2 U.S.C. §431(11). As such, LLCs are subject to the Act's provisions regarding contributions and expenditures made by persons. 2 U.S.C. §§431(8) and (9).

Commission regulations address LLCs in the context of the Act's contribution limitations and prohibitions. The Commission generally treats contributions by LLCs consistent with the tax treatment that

the entities elect under the Internal Revenue Code. An LLC that is treated as a partnership under the Internal Revenue Code is subject to the contribution limits that apply to partnerships. Similarly, an LLC that elects to be treated as a corporation by the Internal Revenue Service (IRS) is subject to the Act's rules on corporate activity. 11 CFR 110.1(g)(3).

For federal income tax purposes, a single member LLC cannot elect to be classified as a partnership. It may either choose to be treated as a corporation or to be disregarded as an entity separate from its owner. 26 CFR 301.7701-3(a). Commission regulations provide that contributions by an LLC with only a single natural person member that does not elect to be treated as a corporation for federal income tax purposes "shall be attributable only to that single member." 11 CFR 110.1(g)(4).

Since TPN is a single natural person member LLC that has not elected corporate tax treatment, TPN is subject to the contribution limitations of Mr. Hanauer, its sole member. The Commission has not previously determined whether or not expenditures by a single member LLC, like contributions, are attributable solely to the LLC's single member. Under the circumstances presented here, the Commission concludes that they are.

As a result of the unity between Mr. Hanauer and TPN, any independent expenditures made by TPN shall be treated as if they were made by Mr. Hanauer. However, if circumstances change such that TPN could be construed as a "group of persons," TPN may need to consider whether it may also be a "political committee" under the Act and Commission regulations. 2 U.S.C. §431(4)(A) and 11 CFR 100.5(a).

Date Issued: April 17, 2009;

Length: 4 pages.

—Myles Martin

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³ The Commission noted that the partial exemption does not extend to individual SWP supporters who, as individuals, engage in activity that might require them to file reports of their own, such as electioneering communications under 2 U.S.C. §434(f) and independent expenditures under 2 U.S.C. §434(g).

Advisory Opinions

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AO 2009-04

Recount and Election Contest Funds

A national party committee may establish a recount fund subject to the Federal Election Campaign Act's (the Act) amount limits, source prohibitions and reporting requirements to pay expenses incurred in connection with recounts and election contests of federal elections.

Background

Al Franken was the Democratic candidate for the U.S. Senate for Minnesota in 2008, facing Republican Senator Norm Coleman. The close outcome of the general election led to a mandatory recount that gave a 225-vote lead to Mr. Franken. In January 2009, Mr. Coleman filed a lawsuit to contest the recount, which has resulted in a protracted legal battle with no final winner yet being determined or seated in the Senate.

The Democratic Senatorial Campaign Committee (DSCC), a national committee of the Democratic Party, wishes to establish a recount fund, separate from its other accounts and subject to a separate limit on amounts received, to pay expenses incurred in connection with the 2008 Senatorial recount and election contest in Minnesota. Donations to the proposed separate recount fund would be subject to the limits, prohibitions and reporting requirements of the Act.

In addition, Mr. Franken's principal campaign committee, Al Franken for U.S. Senate (the Committee), established a recount fund to pay for expenses incurred in connection with the recount, and has used the fund for expenses related to the election contest. The Committee wishes to establish a separate election contest fund that would be subject to the Act's limits, prohibitions and reporting requirements, but would have a limit separate from its recount fund

on amounts received. This proposed fund would be used to pay expenses incurred only in connection with the election contest.

Analysis

In AO 2006-24, the Commission concluded that "because election recount activities are in connection with a Federal election, any recount fund established by either a Federal candidate or the State Party must comply with the amount limitations, source prohibitions, and reporting requirements of the Act." The advice provided by AO 2006-24 applies to a national party committee as well. Thus, the DSCC may establish a recount fund subject to the Act's amount limits, source prohibitions and reporting requirements to be used for expenses incurred in connection with recounts and election contests of federal elections, such as the 2008 Senatorial recount and election contest in Minnesota. The contribution limits for a national party committee for 2009 (\$30,400 per calendar year from an individual and \$15,000 per calendar year from a multicandidate political action committee) apply for any recounts and election contests during 2009. Donations to recount funds are not aggregated with contributions from those same individuals for purposes of the calendar-year and aggregate biennial contribution limits of 2 U.S.C. §§441a(a)(1)(B) and (a)(3).

The Commission could not approve a response by the required four affirmative votes with regard to whether Al Franken for U.S. Senate may establish an election contest fund, separate from its existing recount fund, and subject to a separate donation limit.

Date Issued: March 20, 2009;

Length: 4 pages.

—Zainab Smith

Alternative Disposition of Advisory Opinion Request

AOR 2009-03

On April 21, 2009, the Commission considered, but did not approve, an advisory opinion request from Intercontinental Exchange, Inc., proposing to increase to up to a two-to-one ratio the amount the corporation donates under its charitable matching program for SSF contributions. Unable to reach a consensus, the Commission concluded its consideration of the request and mailed a copy of the draft opinion it considered to the requestor.

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AOR 2009-09

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Outreach

Washington, DC, Conference for Trade Associations, Membership Organizations and Labor Organizations

The Commission will hold its annual conference in Washington, DC, on May 21-22, 2009, for trade associations, membership organizations, labor organizations and their political committees. Commissioners and staff will conduct a variety of technical workshops on the federal campaign finance law. Workshops are designed for those seeking an introduction to the basic provisions of the law as well as for those more experienced in campaign finance law. For additional information, to view the conference agenda or to register for the conference, please visit the conference web site at <http://www.fec.gov/info/conferences/2009/tradememberlabor09.shtml>.

Hotel Information. The conference will be held at the Omni Shoreham hotel in northwest Washington,

FEC Conference Schedule for 2009

Conference for Trade Associations, Membership Organizations, Labor Organizations and their PACs
 May 21-22, 2009
 Omni Shoreham
 Washington, DC

Conference for Campaigns, Party Committees and Corporate/Labor/Trade PACs
 September 15-16, 2009
 Hyatt Regency
 Chicago, IL

Conference for Campaigns, Party Committees and Corporate/Labor/Trade PACs
 October 28-29, 2009
 Sheraton at Fisherman's Wharf
 San Francisco, CA

DC, near the National Zoo and the Woodley-Park-National Zoo Metro subway station (Red Line). Attendees are responsible for making their own hotel reservations. To make hotel reservations call 800-545-8700 or visit the hotel web site (<http://www.omnihotels.com/FindAHotel/WashingtonDCShoreham/Meeting-Facilities/FederalElectionCommissionTradeAssociations5.aspx>) and identify yourself as attending the Federal Election Commission conference. The hotel will also charge the prevailing sales tax, currently 14.5 percent. Valet parking is available for \$28/day. The hotel is walking distance from the Metro subway; public transportation is recommended. The FEC recommends waiting until you have received confirmation of your conference registration from Sylvester Management Corporation.

FEC Conference Questions

Please direct all questions about conference registration and fees to Sylvester Management Corporation (Phone: 1-800/246-7277; e-mail: toni@sylvestermanagement.com). For questions about the conferences and workshops in 2009, call the FEC's Information Division at 1-800/424-1100), or send an e-mail to Conferences@fec.gov.

—Kathy Carothers

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