

RECORD

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REPORTS

REPORTS DUE IN OCTOBER

The following paragraphs explain the reporting schedule for the various categories of filers whose reports are due in October. Note that, during this nonelection year, committees authorized by candidates for Congress are only required to report semiannually: July 31, 1983, and January 31, 1984. Similarly, committees not authorized by candidates, which have not notified the FEC of their intent to file monthly, submit their reports semiannually.

Quarterly Filers

Authorized Presidential committees which have chosen to file on a quarterly (rather than a monthly) basis are required to file a quarterly report by October 15. The report should cover all activity from the closing date of the last report filed or from the date of registration,* whichever is later, through September 30, 1983.

Monthly Filers

Unauthorized committees (i.e., committees not authorized by candidates) and authorized Presidential committees which file on a monthly schedule are required to file reports by the 20th of each month. The report should cover all financial activity of the previous month. For example, the October monthly report should be filed by October 20 and should cover all activity from the closing date of the last report filed or from the date of registration,* whichever is later, through September 30, 1983.

Questions on reporting procedures and requests for additional forms should be addressed to the Public Communications Office, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463; or call 202/523-4068 or toll free 800/424-9530.

* The first report filed by a committee must include all funds received or disbursed prior to becoming a political committee, even if the transaction did not occur during the reporting period covered by the report. 11 CFR 104.3(a) and (b).

SPECIAL ELECTIONS IN WASHINGTON AND GEORGIA

During October and November, special elections will be held in two states to fill vacant Congressional seats. On **October 11, 1983**, Washington will hold a special primary election to nominate candidates for the Senate seat formerly held by the late Senator Henry M. Jackson. A special general election will be held on **November 8, 1983**.

On **October 18, 1983**, Georgia will hold a special election in its 7th Congressional District to fill the vacant House seat formerly held by the late Lawrence P. McDonald. If no candidate obtains a majority of the votes in the special election, a special runoff election will be held on **November 8, 1983**.

The FEC will send notices on reporting requirements and filing dates to individuals known to be actively pursuing election to these Congressional seats. All other committees supporting candidates in the special elections should contact the Commission for more information on required reports. Call 202/523-4068 or toll free 800/424-9530.

REGULATIONS

FEC HOLDS HEARINGS ON CORPORATE/ LABOR COMMUNICATIONS

On August 9 and 10, 1983, the Commission held a second round of public hearings on proposed revisions to Sections 114.3 and 114.4 of FEC Regulations, which govern partisan and nonpartisan communications that may be made by labor organizations and corporations (including incorporated trade associations, incorporated membership organizations, cooperatives and corporations without capital stock). The Commission had held its first public hearings on proposed revisions to these regulations on October 26, 1981.

During the hearings presided over by Chairman Danny L. McDonald, the Commissioners heard testimony from 17 witnesses representing the following organizations: the Leadership Founda-

continued

tion; Moral Majority, Inc.; U.S. Defense Committee; National Center for Constitutional Studies; Committee for the Survival of a Free Congress; Gun Owners of America; Washington Legal Foundation; College Republican National Committee; Public Advocate of the U.S., Inc.; National Taxpayers Union; Citizens for Reagan; National Right to Life Committee, Inc.; American Conservative Union; Concerned Women of America; National Association of Realtors; Center on National Labor Policy; and the Ohio Right to Life Society.

Prior to holding this second round of public hearings, the Commission had received numerous written comments in response to the second notice of proposed rulemaking on these revisions. The Commission will review the comments and testimony before drafting final proposed revisions to Sections 114.3 and 114.4.

Copies of the written comments may be obtained by contacting the FEC's Public Records Office at 202/523-4181 or toll free 800/424-9530.

STATUS OF FEC REGULATIONS SENT TO CONGRESS

Regulations*	Date Sent to Congress	Federal Register Publication	Date Prescribed** by the Commission
11 CFR 100.7(a)(1)(i)(C), 100.7(b)(11), 100.8(b)(12), 110.10(b) and 9003.2(c)(3) Candidate's Use of Property in Which Spouse Has an Interest	4/22/83	4/27/83 48 <u>Fed. Reg.</u> 19019	7/1/83
11 CFR 102.6 and 102.17 Transfer of Funds; Collecting Agents, Joint Fundraising	6/2/83	6/7/83 48 <u>Fed. Reg.</u> 26296	8/22/83
11 CFR 110.11 Disclaimer Notices	2/25/83	3/2/83 48 <u>Fed. Reg.</u> 8809	5/13/83
11 CFR 110.12(a)(2) - (a)(4) Annual Honoraria Limit	NA	4/8/82 47 <u>Fed. Reg.</u> 15098	4/8/82
11 CFR 114.3 and 114.4 Communications by Corporations and Labor Organizations	3/1/83 (withdrawn to obtain further public comment, 4/22/83)	3/4/83 48 <u>Fed. Reg.</u> 9236; 4/22/83 48 <u>Fed. Reg.</u> 17567	
11 CFR 106 and 9031 - 9039 Presidential Primary Matching Fund	1/24/83	2/4/83 48 <u>Fed. Reg.</u> 5224	4/4/83
11 CFR 9001 et seq. General Election Campaign Fund	7/1/83	7/11/83 48 <u>Fed. Reg.</u> 31822	
11 CFR Part 9008 Fund for Presidential Nominating Conventions	NA	7/21/83 48 <u>Fed. Reg.</u> 33244	7/21/83

*The chart is cumulative, listing all amendments to the FEC Regulations proposed after the 1981 edition of 11 CFR was published, including any technical amendments.

**The Commission may prescribe its regulations 30 legislative days after it has transmitted them to Congress.



ADVISORY OPINION REQUESTS

The following chart lists recent requests for advisory opinions (AORs). The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR	Subject
1983-21	Donations to and disbursements from trust fund established by Congressman for legal fees arising from non-FECA proceedings. (Date made public: August 15, 1983; Length: 2 pages, plus 8-page supplement)
1983-22	Reimbursement of PAC's administrative expenses by parent corporation. (Date made public: August 18, 1983; Length: 1 page)
1983-23	Reception facility and events sponsored by corporation at major party Presidential nominating conventions. (Date made public: August 25, 1983; Length: 5 pages)
1983-24	Reception for contributors to trade association PAC paid by corporations. (Date made public: August 30, 1983; Length: 6 pages)
1983-25	Recordkeeping and reporting requirements for media costs paid by publicly funded Presidential primary campaign. (Date made public: September 1, 1983; Length: 2 pages)
1983-26	Volunteer services provided by recording artist to candidate, state party committee, and an unauthorized committee planning independent expenditures on the candidate's behalf. (Date made public: September 1, 1983; Length: 4 pages)

AOR	Subject
1983-27	Excess campaign funds donated to education foundation. (Date made public: September 8, 1983; Length: 4 pages, plus 11-page supplement)
1983-28	Disaffiliation between respective PACs of two trade associations. (Date made public: September 8, 1983; Length: 2 pages, plus 40-page supplement)
1983-29	City's use of fund (consisting of donations from individuals, associations and businesses) to finance 1984 Presidential nominating convention. (Date made public: September 19, 1983; Length: 14 pages, plus 6-page supplement)
1983-30	Donations to fund established by candidate to defray costs of litigation involving state constitution provision. (Date made public: September 31, 1983; Length: 4 pages)

ADVISORY OPINIONS: SUMMARIES

An Advisory Opinion (AO) issued by the Commission provides guidance with regard to the specific situation described in the AOR. Any qualified person who has requested an AO and acts in accordance with the opinion will not be subject to any sanctions under the Act. Other persons may rely on the opinion if they are involved in a specific activity which is indistinguishable in all material aspects from the activity discussed in the AO. Those seeking guidance for their own activity, however, should consult the full text of an AO and not rely only on the summary given here.

AO 1983-17 Corporate PAC's Payroll Deduction Plan for Employees Who Are Stockholders

The Idaho Power Company (the Company) may use a payroll deduction plan to facilitate contributions to its separate segregated fund, IDA-PAC, from those Company employees who qualify as stockholders under Commission regulations as the result of participating in one of the stockholder benefit plans offered by the Company. 11

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The Record is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: Danny Lee McDonald, Chairman; Lee Ann Elliott, Vice Chairman; Joan D. Aikens; Thomas E. Harris; John Warren McGarry; Frank P. Reiche; William F. Hildenbrand, Secretary of the Senate, Ex Officio; Benjamin J. Guthrie, Clerk of the House of Representatives, Ex Officio. For more information, call 202/523-4068 or toll-free 800/424-9530.

CFR 114.5(g). Some Company employees, however, do not qualify as stockholders under Commission Regulations because their particular benefit plans restrict their right to withdraw their shares of stock. Accordingly, unless they are administrative or executive personnel, they are not eligible for IDA-PAC solicitations. (The Act restricts solicitations by a corporation and its separate segregated fund to the corporation's stockholders, executive and administrative personnel, and the families of both groups. 2 U.S.C. §441b(b)(4)(B).)

Under one plan, the Employee Savings Plan (ESP), both the employee and the Company purchase common stock in the Company for the employee. (The Company establishes two accounts for each employee: one for the employee's contribution to the plan and the other for the Company's partial matching contribution.) The ESP also offers a deferred salary option which enables employees to buy stock in before-tax dollars. Under another plan, the Employee Stock Ownership Plan (ESOP), the Company purchases common stock for every employee, depending on the Company's tax status during the previous year. Under certain circumstances, employees participating in the ESOP may also contribute to the purchase of their shares.

Under all the benefit plans, an employee does not receive dividends directly. Instead, the Company reinvests the dividends earned on an employee's stock by purchasing additional shares for him/her. In order to receive dividends on their stocks, employees must withdraw shares allocated to their accounts.

Under Commission Regulations, an employee participating in any of the Company's benefit plans would be considered a stockholder, eligible for IDA-PAC solicitations, if the employee has:

1. A vested, beneficial interest in the stock;
2. The power to direct how the stock will be voted (if it is voting stock); and
3. The right to receive dividends. 11 CFR 114.1(h).

While all employees participating in the benefit plans would meet the first two requirements for stockholder status, certain participants would not meet the third requirement because of restrictions placed on their access to dividends. For instance, under the ESP, an employee may receive dividends only when he/she withdraws all the shares credited to his/her account as of the end of a calendar quarter. Share withdrawals may not occur more than once a year. Moreover, upon withdrawing shares, the employee may not contribute to the plan for an entire year. Finally, an employee may withdraw shares from the matching account set up by the Company only when he/she terminates employment. As a result of these

restrictions, an ESP participant would only qualify as a solicitable stockholder if the employee withdrew all the shares purchased with his/her contributions.

On the other hand, relatively unrestricted stock withdrawal rights accrue to participants in the ESP deferred salary option who have reached the age of 59 1/2 years. An employee has the option to withdraw any amount of shares from the account to which he/she contributes. A participant may also continue contributing to his or her account immediately after a full or partial share withdrawal. Moreover, while still employed by the Company, a participant may withdraw shares from the matching account set up by the Company. Consequently, participants in the ESP deferred salary option who are at least 59 1/2 years of age would qualify as solicitable stockholders.

In contrast to the ESP options, the ESOP imposes a single restriction on a participant's right to withdraw stock. Under the plan, an employee may withdraw shares after the shares have been allocated to his/her account for 84 months. Therefore, once this requirement was met, an ESOP participant would qualify as a solicitable stockholder--whether or not he/she actually chose to withdraw stock. Commissioner Joan D. Aikens filed a dissenting opinion. (Date issued: August 30, 1983; Length: 9 pages, including dissent).

AO 1983-18: Contributions Earmarked Through Trade Association PAC to Other Trade Association PACs

Officers of Stop and Shop Companies, Inc. may earmark unsolicited contributions through the separate segregated fund (political action committee or PAC) of one trade association to the PACs of other trade associations. Stop and Shop, a Massachusetts corporation comprised of several retail divisions which are **not** separate corporations, does not have a separate segregated fund. Stop and Shop has, however, authorized solicitations of its corporate and divisional officers during 1983 by the PAC of the trade association with which it is affiliated, the Food Marketing Institute (FMI). Since a corporation may authorize only one trade association PAC to solicit contributions during the year, Stop and Shop's operating divisions may **not** authorize additional solicitations by other trade association PACs. 2 U.S.C. §441b(b)(4)(D). The officers of the operating divisions may, however, earmark contributions through FMI's PAC to other trade association PACs, provided:

-- The earmarked contributions have not been solicited by Stop and Shop or by the recipient PACs and are otherwise lawful under the Act;

- FMI's PAC does not directly or indirectly suggest that Stop and Shop officers earmark contributions to specific trade association PACs (though the PAC may inform the officers generally that earmarked contributions to other PACs are permissible); and
- FMI's PAC complies with FEC Regulations governing the proper transmittal of earmarked contributions by an unauthorized political committee. 11 CFR 102.8(b).

The Commission noted that its regulations did not require FMI's PAC to forward any contributions earmarked by Stop and Shop's divisional officers. If FMI's PAC should decline to forward the contributions, it must return them to the donors without depositing them. 11 CFR 103.3(b). (Date issued: August 15, 1983; Length: 4 pages)

AO 1983-19: PAC Established by Joint Venture Partially Owned by Foreign Corporation: Administrative Expenses, Affiliation and Multicandidate Status

Amax, Inc., a New York corporation, may absorb a portion of the costs* incurred in establishing and administering a separate segregated fund for Alumax, Inc., a joint venture corporation in which Amax owns 50 percent of the voting shares and two Japanese corporations (and the American subsidiary of one) own the remaining shares. Furthermore, since Alumax, Inc.'s separate segregated fund (Alumax PAC) would be affiliated with Amax's separate segregated fund (the Amax Fund), immediately upon its establishment, the Alumax PAC would share the Amax Fund's multicandidate committee status. See AO 1980-40. As affiliated multicandidate committees, Alumax PAC and the Amax Fund could transfer unlimited funds between them and would be subject to a single contribution limit. 11 CFR 100.5(e)(3). Moreover, the PACs would each have to file separate FEC reports and would have to identify each other as affiliated committees on their respective Statements of Organization. 11 CFR 102.2(b)(1) and 104.1.

Although a large portion of Alumax shares (45 percent) are owned by foreign corporations, Alumax would not be considered a "foreign national," prohibited by the Act from participating in American elections. 2 U.S.C. §441e. Rather, as a discrete corporate entity operating in Delaware and organized under the state's laws, Alumax is

considered an American corporation, eligible to establish a PAC, provided: a) no foreign national exercises control over Alumax PAC's operations; and b) Alumax PAC neither solicits nor accepts contributions from foreign nationals. See AO's 1980-100, 1980-111 and 1982-34.

Under the described circumstances, where Amax owns a 50 percent interest in Alumax, their respective PACs are affiliated committees. Since Alumax and Amax are closely related and since their two PACs are affiliated, Amax may absorb a portion of Alumax PAC's administrative costs. The Commission has ruled in previous advisory opinions that these exempt administrative expenses may be shared by several corporations whose close relationship would permit the PAC of one corporation to solicit the solicitable personnel of the other corporation. See AO's 1980-18 and 1982-34. Commissioners Thomas E. Harris and Danny L. McDonald filed a dissenting opinion. (Date issued: August 19, 1983; Length: 5 pages, including dissent)

AO 1983-20: Independent Expenditures Made by Unauthorized Committee to Oppose Election of Publicly Funded Presidential Nominee

If an eligible Presidential candidate accepts public funding for a general election campaign in 1984, the National Conservative Political Action Committee (NCPAC), a multicandidate political committee not authorized by any candidate, may not make independent expenditures exceeding \$1,000 for communications which expressly advocate the defeat of the candidate's Democratic opponent in the general election.

Section 9012(f) of the Presidential Election Campaign Fund Act imposes a \$1,000 limit on expenditures made by an unauthorized committee to further the election of a publicly funded Presidential nominee. This provision applies when expenditures are made to benefit an "eligible candidate," that is, a nominee who has met the conditions for eligibility for public funds and who has received his party's Presidential nomination. Since expenditures to advocate the defeat of the Democratic nominee would necessarily further the election of an opponent of that nominee, the \$1,000 limit would apply to such negative expenditures if the opponent accepted public funding. For purposes of the \$1,000 limit on NCPAC's negative expenditures, it makes no difference whether or not the Democratic nominee accepts public funding. (Date issued: August 31, 1983; Length: 3 pages)

*Under the Act, these administrative costs are specifically exempt from the definitions of "contribution" and "expenditure." See 2 U.S.C. Section 441b(b)(2)(C).



SENATOR HART ELIGIBLE FOR PRIMARY MATCHING FUNDS

On August 18, 1983, the Commission determined that Senator Gary Hart, a Democratic candidate for President, was eligible to receive federal matching funds for his 1984 primary campaign. (For a complete explanation of the eligibility requirements, consult 26 U.S.C. §9033 and Commission Regulations at 11 CFR 9033 and 9036.1.)

Under the election law, Presidential candidates may begin seeking eligibility for primary matching funds after January 1, 1983. However, the U.S. Treasury may not make actual payments before January 1, 1984. The maximum amount of matching funds an eligible candidate may receive during 1984 for the primary elections is equal to half the overall spending limit established by law for each publicly funded Presidential primary candidate (\$10 million, plus a cost-of-living adjustment).



FEC REPORTS ON COMMUNICATION COSTS: 1981-82

Twenty-five labor unions and five incorporated membership organizations* reported spending a total of \$2.2 million on partisan communications directed to their members during the 1981-82 election cycle.** According to a study released by the FEC on September 7, 1983, no corporations reported such communication costs. (Partisan communication costs may include, for example, disbursements for the production and distribution of literature promoting a particular candidate, provided the material is not a reproduction of the candidate's own literature.)

The election law allows labor organizations, corporations and incorporated membership organizations to pay the costs of partisan communications

(i.e., communications which expressly advocate the election or defeat of a clearly identified candidate), provided the communications are limited to the organization's restricted class of personnel.* Specifically exempt from the law's definitions of "contribution" and "expenditure," disbursements for communication costs are distinct from contributions and expenditures (including independent expenditures) made by an organization's separate segregated fund. The organization must, however, report its total communication costs when they exceed \$2,000 per election. 2 U.S.C. §431(9)(B)(iii) and 11 CFR 100.8(b)(4), 104.6 and 114.3.

The FEC study showed that, of the \$2.2 million reported by the 30 organizations, \$2,133,711 was devoted to communications which promoted the election of 714 federal candidates. The organizations spent the remaining \$84,623 on communications which advocated the defeat of 180 federal candidates. All but \$5,591 of the total spent was related to Congressional campaigns.

Reported disbursements for partisan communications increased by 251 percent between the 1977-78 and 1979-80 election cycles and by 67 percent between the 1979-80 and 1981-82 election cycles.

The chart below lists all the organizations reporting communication costs incurred during the 1981-82 election cycle. More detailed information may be obtained from the study, FEC Index of Communication Costs for 1981-82. The study consists of two indexes. The first lists each organization making communication disbursements and summarizes the amounts spent for and against each candidate. The second index lists each candidate and details how much various organizations spent for or against the candidate. The Index is available at \$5.00 per copy from the FEC's Public Records Office, 1325 K Street, N.W., Washington, D.C. 20463. Checks should be made payable to the FEC.

**An organization's restricted class of personnel includes those individuals who may be solicited at any time for contributions to the organization's separate segregated fund and who may receive partisan communications from the organization. A labor organization's restricted class of personnel includes its members and their families. An incorporated membership organization's restricted class includes its noncorporate members as well as its own executive and administrative personnel, its stockholders and their respective families.*

**Incorporated membership organizations include corporations without capital stock, incorporated trade associations and incorporated cooperatives.*

***Reports of communication costs must be filed on FEC Form 7 or by a letter containing the same information.*

**ORGANIZATIONS REPORTING
COMMUNICATION COSTS
FOR 1981-1982 ELECTION CYCLE**

Organization	Total Funds Spent
National Rifle Association	\$ 803,656
American Federation of State, County and Municipal Employees	564,770
AFL-CIO	311,084
Chamber of Commerce of the U.S.	190,457
National Education Association	72,968
Connecticut State UAW CAP Council	31,834
Coal Miners PAC/United Mine Workers of America	24,185
Virginia State AFL-CIO	20,001
International Union - UAW	15,229
Machinists Non-Partisan Political League	15,079
Montana State AFL-CIO	13,919
Georgia State AFL-CIO	12,780
Utah State AFL-CIO	12,350
Communication Workers of America	12,244
West Virginia AFL-CIO Voluntary Fund	11,065
Brotherhood of Railway and Airline Clerks	9,939
Tennessee State Labor Council	8,957
Sierra Club	8,220
Pennsylvania State UAW CAP Council	7,278
American Federation of Teachers, AFL-CIO	7,216
Amalgamated Clothing & Textile Workers Union	6,613
Minnesota Education Association	5,937
Carpenters Committee on Political Action	5,784
Ohio Education Association	5,197
Nevada State AFL-CIO	5,157
Massachusetts State UAW CAP Council	4,396
Delaware State AFL-CIO	3,986
New Mexico State AFL-CIO	3,669
Sun-Maid Growers of California	2,204
Citizens Choice	2,160
Total	\$2,133,711

**CONGRESS AMENDS HONORARIUM
PROVISION**

On July 30, 1983, the President approved an amendment to 2 U.S.C. §441i(b) which was included in legislation providing supplemental appropriations for federal programs in Fiscal Year 1983. Pub. L. 98-63. Section 441i, in its entirety, prohibits federal officers and employees from accepting more than \$2,000 as an honorarium for any appearance, speech or article. The amended subsection pertains to the payment of honoraria to charitable organizations. Under the amended provision, an honorarium (or any portion of it) may be exempted from the \$2,000 limit if either the honorarium recipient or the organization paying it donates the funds to a charitable organization. Under the former provision, the exemption applied only if the organization paying the honorarium gave it to a charitable organization which it selected from a list of at least five organizations suggested by the honorarium recipient.

CHANGE OF ADDRESS

Political Committees

Registered political committees are automatically sent the Record. Any change of address by a registered committee must, by law, be made in writing as an amendment to FEC Form 1 (Statement of Organization) and filed with the Clerk of the House, the Secretary of the Senate, or the FEC, as appropriate.

Other Subscribers

Record subscribers (who are not political committees), when calling or mailing in a change of address, are asked to provide the following information:

1. Name of person to whom the Record is sent.
2. Old address.
3. New address.
4. Subscription number. The subscription number is located in the upper left hand corner of the mailing label. It consists of three letters and five numbers. Without this number, there is no guarantee that your subscription can be located on the computer.

FEDERAL REGISTER

FEDERAL REGISTER NOTICES

The items below identify FEC documents that appeared in the Federal Register between August and September, 1983. Copies of the notices are available in the Public Records Office.

Notice Title

- 1983-22 Rulemaking Petition: Notice of Availability (The National Taxpayer's Legal Fund has recommended an amendment to 11 CFR 9002.15, which defines a "political party" for purposes of the Presidential Election Campaign Fund Act.) (48 Fed. Reg. 39295, August 30, 1983)
- 1983-23 11 CFR Part 102: Transfer of Funds, Collecting Agents; Joint Fundraising: Announcement of Final Rule (Correction) (48 Fed. Reg. 43292, September 23, 1983)
- 1983-24 Filing Dates for Washington: Special Primary and General Elections (48 Fed. Reg. 43405, September 23, 1983)
- 1983-25 Filing Dates for Georgia: Special Election and Special Runoff Election (48 Fed. Reg. 43404, September 23, 1983)

PUBLICATIONS

ELECTION RESULTS FOR THE U.S. SENATE AND THE U.S. HOUSE OF REPRESENTATIVES

During September 1983, the Commission published the official results of the Congressional general elections held on November 2, 1982. Based on official figures provided by state election officials, Election Results for the U.S. Senate and the U.S. House of Representatives is divided into two sections. The first section provides state-by-state listings of the vote results for all **Senate** candidates running in the 1982 general elections and gives each candidate's total votes as well as his/her percentage of the total votes cast in that particular election. The second section provides similar information for all **House** candidates. If the vote results are modified in the future as the result of litigation or the discovery of errors, the FEC's Information Division will supply errata supplements as necessary.

The Commission has prepared this publication for internal use and for state election offices. Additional copies (available at \$4.25 per copy) may be ordered from the U.S. Government Printing Office, Washington, D.C. 20402. The order number is 052-006-00028-7. Checks should be made payable to the Superintendent of Documents. Call 202/523-4183 or toll-free 800/424-9530 for additional ordering information.

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