

RECORD

OPINIONS

AO 1984-37: Political Services Rendered by Employees of Parent Organization and Paid by PAC

The American Medical Political Action Committee (AMPAC), the separate segregated fund of the American Medical Association (AMA), a nonprofit corporation, may make in-kind contributions to House and Senate candidates by purchasing the consulting services of AMA employees and providing them to the candidates. AMPAC may purchase the employees' services by using either an advance payment plan or a dual employment method. Both methods are permissible because they do not involve advances or payments made with AMA corporate funds. 11 CFR 100.7(a)(3) and 114.112(c). Under either proposed payment plan, AMPAC must record and report payments made to AMA, as required by FEC Regulations. See below and 11 CFR 102.9, 104.3, 104.10 and 106.1(a).

Advance Payment Plan

Under the advance payment plan, AMPAC would determine the number of hours each employee was expected to work for each candidate and would pay AMA for the employees' services at the fair market rate charged by independent consultants. AMA would continue to pay its employees their regular salary and fringe benefits, which would be substantially less than the AMPAC payments for these employees' services. Payment would be made before the services were rendered to the candidate and before the employee was compensated for the services. If the value of an employee's consulting services actually exceeded the advance payment to AMA, AMPAC would pay AMA additional funds before the employee provided the services. Conversely, AMA would apply any excess AMPAC payments to future employee services. AMPAC would absorb costs associated with the employees' campaign services (e.g., travel and lodging) either by paying the vendors directly or by reimbursing employees.

AMA's office facilities would not be used by the AMA consultants. If needed, office supplies and services would be purchased from independent contractors.

The Commission distinguished this arrangement from the one the Commission rejected in AO 1984-24. In that opinion, the Commission ruled that an advance payment plan was impermissible because it involved an initial disbursement by the parent organization to pay for the services rendered by its employees to candidates. That plan would have resulted in prohibited contributions from the organization to both its PAC and the candidates.

Dual Employment Plan

Under the dual employment payment method, an AMA employee would take an unpaid leave of absence to work on a campaign. During this period, AMPAC would compensate the employee at his/her AMA salary rate. Moreover, AMPAC would reimburse AMA for fringe benefits the employee accrued during his/her leave of absence.

continued on p. 3

TABLE OF CONTENTS

1	OPINIONS
	REPORTS
2	Reports Due in December
	PUBLICATIONS
5	PAC Contributions to Congressional Candidates
	PRESIDENTIAL ELECTIONS
5	General Election Candidates
	COURT CASES
5	<u>Antosh v. FEC</u>
6	<u>FEC v. Citizens for LaRouche</u>
7	New Litigation
	COMPLIANCE
7	Summary of MURS
	CLEARINGHOUSE
8	Updated Publications

DECEMBER REPORTING SCHEDULE

Only those political committees and organizations listed in the chart below are required to file a report in December. Note that the next report required of all political committees is the year-end report, due January 31, 1985. To obtain more information, contact the Office of Public Communications, FEC, 1325 K St., N.W., Washington, D.C. 20463; or call 202/523-4068 or toll free 800/424-9530.

Type of Filer	Post-General Report (December 6)
1984 Congressional Candidates Active in the General Election	X
1984 Presidential Candidates/\$100,000+ ^{1/}	X
1984 Presidential Candidates/Under \$100,000/Active in the General Election	X
Unauthorized Committees/Monthly	X ^{2/}
Unauthorized Committees/Quarterly ^{2/}	X
Connected Organizations/Communications ^{3/}	X

^{1/}Authorized Presidential committees with activity of \$100,000 or more that are not participating in the general election may file a November monthly report, due by December 20, or a post-general election report. See AO 1980-83.

^{2/}Unauthorized committees that file on a monthly schedule must file a post-general election report in lieu of the November monthly report, otherwise due by December 20. All other unauthorized committees must also file the post-general election report, regardless of their election activity.

^{3/} Report required if aggregate costs for internal communications which expressly advocate the election or defeat of (a) clearly identified candidate(s) in the 1984 general election have exceeded \$2,000.

Post-General Election Report

The post-general election report is due December 6 and must cover activity through November 26, 1984. If sent by registered or certified mail, the report must be postmarked no later than December 6. Note that all unauthorized committees must file the report, regardless of their election activity.

Monthly Report

In lieu of the November monthly report, otherwise due in December, monthly filers must file a post-general election report, due by December 6. (See schedule above.)

WHERE REPORTS ARE FILED

Committees must file all reports and statements simultaneously with the appropriate federal and state officials. 11 CFR 108.5.

Filing with the Federal Government

1. The principal campaign committees of House candidates and committees supporting or opposing only House candidates file with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. 11 CFR 104.4(c)(3) and 105.1.
2. The principal campaign committees of Senate candidates and committees supporting or opposing only Senate candidates file with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, D.C. 20510. 11 CFR 104.4(c)(2) and 105.2.
3. All other committees, including the principal campaign committees of Presidential candidates, file with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. 11 CFR 105.3 and 105.4.

Filing with State Governments

1. The principal campaign committees of Congressional candidates must file a copy of every report and statement with the Secretary of State or the appropriate election official of the state in which the candidate seeks federal office. 11 CFR 108.3.
2. Unauthorized committees making contributions or expenditures in connection with House and Senate races file in the state in which the candidate seeks election. The law requires a copy only of that portion of the report applicable to the candidate(s) being supported. Committees supporting Presidential candidates must file in the state(s) in which the Presidential committee and donor committee have their respective headquarters.

OPINIONS, continued from p.1**Reporting Requirements**

Under either payment plan, AMPAC must report all disbursements for the employees' consulting services as in-kind contributions to candidates. See 11 CFR 102.9, 104.3, 104.13 and 106.1(a). Under the advance payment plan, AMPAC would report each payment to AMA as an expenditure (in-kind contribution) for the reporting period in which the payment was made. On the report, AMPAC would also include a memo entry detailing the amount of the in-kind contribution allocated to each candidate. See 11 CFR 104.10 and 106.1(a); and reporting procedures on the back of Schedule B, FEC Form 3X. If AMPAC had to subsequently readjust the payment because it either overestimated or underestimated the costs of employee services, it would disclose the correct amount on an amended report for the appropriate reporting period. A candidate's authorized committee reports the dates when the services are performed as the date(s) AMPAC makes the in-kind contribution(s). Commissioner Frank P. Reiche filed a concurring opinion. (Date issued: September 26, 1984; Length: 11 pages, including concurring opinion)

AO 1984-39: Incumbent's Use of Mailing List Supplied by Outside Group

Congressman Mike Synar may use a mailing list supplied by the Alliance for Energy Security (the Alliance) to make a franked mailing to his constituents which clarifies his support for the federal deregulation of natural gas prices. (Previously, the Alliance sent Congressman Synar's constituents some pamphlets which allegedly distorted his position on the issue.) In supplying the list, the Alliance will not be making an in-kind contribution to Congressman Synar's 1984 reelection campaign because the list will be used to communicate with his constituents -- not to influence his reelection. Specifically:

- Congressman Synar will make the mailing after the November general election;
- The draft letter proposed for the mailing will make no reference to elections, political parties, campaign finance matters or Congressman Synar's candidacy; and
- The mailing list will be used solely for this one mailing and will not be retained for later use by Congressman Synar's campaign.

The Commission did not address other applicable federal laws or House rules because they are not within its jurisdiction. (Date issued: September 14, 1984; Length: 2 pages)

AO 1984-42: Contribution Limits Applied to Candidate Running in Special and General Elections

A separate contribution limit applies to each of two elections in which Carl Perkins simultaneously is seeking the same office. The two elections are: a special election, to fill the remaining term of the Representative from Kentucky's seventh Congressional district, and the general election, to fill the new term of the same Congressional seat.

Mr. Perkins has established a separate campaign committee for each election. Donors may contribute up to their maximum limit to each committee because the two elections, although held on the same day, are considered separate. 11 CFR 110.1(j)(1). The law specifically defines, as separate elections, a special election and a general election. 11 CFR 100.2(b) and 100.2(f). This view is further supported by the facts that, as required under Kentucky law, Mr. Perkins' name will appear twice on the ballot (once for each election) and the voter may cast two votes, one for each election. (Date issued: September 27, 1984; Length: 2 pages)

AO 1984-43: Praise of Candidate by Company Official in TV Ad Paid by Candidate

If an executive employee of the Brunswick Corporation praises the work of Congressman Jim Jones (D-OK) in a television ad paid for by Congressman Jones' reelection committee, the endorsement will not constitute a contribution to Congressman Jones from either the employee or the corporation. The employee will be volunteering his time to make the endorsement. Although the employee will be identified as a company official in the ad, his statement will not result in a prohibited corporate contribution because the company is not paying for the ad. (Date issued: September 14, 1984; Length: 2 pages)

The Record is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: Lee Ann Elliott, Chairman; Thomas E. Harris, Vice Chairman; Joan D. Aikens; Danny Lee McDonald; 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.

AO 1984-45: Credit Card Contributions to PAC

KFC Corporation may pay credit card service fees incurred by its separate segregated fund (i.e., its political action committee or PAC) when the PAC accepts credit card contributions from the corporation's solicitable personnel. FEC Regulations specifically permit a parent corporation to pay solicitation costs incurred by its PAC. See 11 CFR 114.1(b). The companies that issue the credit cards will charge the PAC a monthly service fee and debit the amount from the PAC's account. If KFC Corporation plans to reimburse its PAC for the service charges, the corporation must do so no later than 30 days after the PAC has paid them. 11 CFR 114.5(b)(3). (Date issued: October 5, 1984; Length: 3 pages)

AO 1983-48: Corporate PAC Solicitation of (Reconsidered) Personnel of Affiliated Partnerships and Corporations

On September 14, 1984, after considering additional information provided by the requester, the Commission issued a revised version of AO 1983-48. (For a summary of the original opinion, issued February 17, 1984, see p.6 of the April 1984 Record.) The Commission's original opinion was vacated by its September 13 decision to reconsider the opinion at the request of the requester, Cablevision Systems Corporation (CSC). (See FEC reconsideration procedures at 11 CFR 112.6(a).) (CSC is a New York corporation wholly owned by its board chairman Charles F. Dolan. CSC, together with other corporations and limited and general interest partnerships, constitutes a privately held network of cable television system operators and companies.)

In the revised opinion, the Commission reaffirmed the conclusion reached in its original opinion that CSC may sponsor a separate segregated fund to solicit contributions from: 1) CSC's solicitable personnel; and 2) the solicitable personnel of corporations and partnerships in the cable television network that qualify as CSC affiliates. In the revised opinion, CSC affiliates include:

1. Twelve corporations owned or controlled by Mr. Dolan; and
2. Thirteen limited and general partnerships in which Mr. Dolan holds the controlling partnership interests. (This group includes a New Jersey joint venture partnership which the Commission had originally ruled did not qualify as a CSC affiliate.)

The Commission ruled that CSC's PAC may not solicit the solicitable personnel of nine other partnerships. These partnerships do not qualify as CSC affiliates because neither Mr. Dolan nor a Dolan-controlled corporation has controlling partnership interests in them.* (This group includes

three Connecticut limited partnerships which the Commission originally ruled were CSC affiliates.) (Date issued: September 14, 1984; Length: 8 pages)

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

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|---------|---|
| 1984-50 | Posters of Vice Presidential Candidate Contributed by (former) Congressional campaign to National party committee. (Date made public: September 20, 1984; Length: 1 page) |
| 1984-51 | Partisan literature prepared by coalition of three local unions and distributed to their respective members. (Date made public: September 24, 1984; Length: 3 pages; withdrawn on October 9, 1984). |
| 1984-52 | Congressman's handling of reportedly illegal contributions to 1982 campaign. (Date made public: September 24, 1984; Length: 6 pages) |
| 1984-53 | Exclusion of real estate lessors from definition of "federal contractor" for purposes of PAC contributions. (Date made public: September 25, 1984; Length: 2 pages) |
| 1984-54 | Reporting by Congressional candidates nominated and elected in Louisiana primary election. (Date made public: October 9, 1984; Length: 2 pages) |
| 1984-55 | Solicitation of two law firms' partners by PAC of client bank. (Date made public: October 9, 1984; Length: 2 pages) |

*An accompanying memorandum from the General Counsel to the Commission (Agenda Document 84-145) explained that serving as the "managing partner" is not, by itself, sufficient evidence of controlling the partnership. New facts indicated that, as managing partner of three Connecticut partnerships, Mr. Dolan has no greater powers than those granted to all the general partners. Consequently, these partnerships cannot be considered affiliates of Mr. Dolan's corporation, CSC.

PUBLICATIONS

NEW PUBLICATION ON PAC CONTRIBUTIONS TO CONGRESSIONAL CANDIDATES

During October, the Commission made available a publication entitled PAC Money Contributed to U.S. Senate and House Candidates: 1977-82. The publication was prepared from information contained in the FEC's Reports on Financial Activity series for 1977-78, 1979-80 and 1981-82.

For each two-year election cycle, the publication lists Senate and House candidates separately and notes total PAC contributions made to each candidate on the lists. Candidates are listed in descending order according to the total PAC money received.

The lists for each election cycle include only those candidates who were actively seeking election during that particular cycle. Candidates who received PAC contributions to retire campaign debts or to run in future elections were not included.

Copies of PAC Money Contributed to U.S. Senate and House Candidates: 1977-1982 may be purchased for \$5.00 per copy from the FEC's Office of Public Records, 1325 K Street, N.W., Washington, D.C. 20463. Checks should be made payable to the FEC.

PRESIDENTIAL ELECTIONS

EIGHTEEN PRESIDENTIAL CANDIDATES IN 1984 GENERAL ELECTION

By the end of October, 18 Presidential candidates representing 17 different political parties had qualified for the general election ballot in various states throughout the country and the District of Columbia. In the 1980 Presidential general election, 21 candidates were on the ballot. For a listing of the 1984 candidates, their party affiliations and home states, see the October 3, 1984, FEC press release, available free of charge in the Commission's Public Records Office, 1325 K Street, N.W., Washington, D.C. 20463.

COURT CASES

ANTOSH v. FEC (Suits 1 and 2)

On August 30, 1984, the U.S. District Court for the District of Columbia issued an order granting the FEC's motion to dismiss Antosh v. FEC (Civil Action No. 84-1552) and denying the plaintiff's motion to file a supplemental complaint. On September 13, 1984, the court issued an opinion explaining the ruling. Following the court's order, Mr. Antosh filed a second suit with the court on September 6, 1984. (Antosh v. FEC; Civil Action No. 84-2737).

First Suit

Pursuant to 2 U.S.C. §437(g)(a)(8), Mr. James E. Antosh filed his suit with the court on May 17, 1984, seeking action on an administrative complaint he had filed with the FEC on December 2, 1983. Specifically, Mr. Antosh asked the court to:

- Declare that the FEC's failure to act on his administrative complaint within 120 days was contrary to law; and
- Issue an order directing the FEC to proceed with an investigation into the complaint within 30 days.

Mr. Antosh had filed the administrative complaint against the separate segregated fund of the AFL-CIO, an international labor organization, and against the three separate segregated funds of international/national unions, which he alleged were affiliated with the AFL-CIO. He complained that the respondents had violated the election law by failing to:

- Disclose their affiliation on their respective Statements of Organization; and
- Comply with a single contribution limit on contributions they had made to each of 17 federal candidates.

Furthermore, his complaint claimed that the election law and FEC Regulations recognize automatic affiliation between business federations and their members, on the one hand, while only a discretionary affiliation between a labor federation and its members, on the other. Plaintiff had alleged that this was discriminatory treatment in violation of the First and Fifth Amendments.

On July 10, 1984, the Commission dismissed Mr. Antosh's administrative complaint, finding no reason to believe that violations of the election law had occurred. On the same day, the Commission also filed a motion with the court to dismiss Mr. Antosh's suit as moot. On July 23, 1984, Mr. Antosh requested that the court deny the FEC's motion to dismiss his case and grant his motion to

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file a supplemental complaint. In his proposed supplemental complaint, Mr. Antosh requested that the court: 1) declare that the FEC's dismissal of his administrative complaint was contrary to law, and 2) certify his constitutional questions to an appeals court.

The court found, however, that Mr. Antosh's July 23 request did not constitute a supplement to his original suit because, unlike the original request, the motion did not deal with delays in processing his complaint. Rather, the proposed supplement dealt with the merits of the FEC's decision to dismiss the complaint. The court therefore decided that, under procedural rules, Mr. Antosh had to file a separate suit with the court. See Fed. R. Civ. P. 15(d).

Second Suit

Following the district court's opinion, on September 6, 1984, Mr. Antosh filed a second suit with the court in which he reiterated the claims made in the proposed supplement to his first suit. In addition, Mr. Antosh asked the court to issue an order directing the FEC to find reason to believe, within 30 days, that the respondents named in Mr. Antosh's administrative complaint had violated the election law.

FEC v. CITIZENS FOR LaROUCHE

On September 17, 1984, the U.S. District Court for the District of Columbia issued an order in *FEC v. Citizens for LaRouche* (Civil Action No. 83-373), which granted summary judgment in favor of the FEC and dismissed the defendants' counterclaims.

Background

On February 9, 1983, the FEC filed suit against Lyndon H. LaRouche and the Citizens for LaRouche (CFL), Mr. LaRouche's principal campaign committee for his publicly funded Presidential campaign in 1980. In the suit, the FEC asked the district court to declare that the LaRouche campaign had violated a conciliation agreement entered into by CFL with the FEC. The Commission claimed that the campaign had failed to pay any portion of the \$15,000 civil penalty stipulated in the agreement. The conciliation agreement had resulted from an enforcement action in which the FEC had found probable cause to believe that, among other violations, the LaRouche campaign had accepted unlawful contributions in 1979 and 1980.

In its suit, therefore, the FEC had asked the district court:

- To declare that CFL had violated the conciliation agreement;
- To order Mr. LaRouche and the LaRouche campaign to pay the \$15,000 civil penalty (with interest);
- To permanently enjoin the LaRouche campaign from further violations of the conciliation agreement;
- To declare that Mr. LaRouche was jointly and severally liable for the civil penalty and that, in failing to pay the penalty, he had violated one of the terms of his certification letter. (He had signed the letter in November 1979 as a prerequisite to being eligible for primary matching funds); and
- To permanently enjoin Mr. LaRouche from further violating the terms of the certification letter.

Mr. LaRouche and the LaRouche campaign admitted that it had failed to pay any portion of the civil penalty. The defendants maintained, however, that the entire written conciliation agreement had been voided by the FEC's alleged breach of both the written agreement and a supplemental oral agreement that allegedly had been reached between the campaign and FEC attorneys. As a result, the defendants claimed, the FEC could not recover the civil penalty.

The Court's Ruling

The court noted that, under the election law, a conciliation agreement may only be entered into with the affirmative vote of four Commissioners. See 2 U.S.C. §437g(a)(4)(A)(i). The court found, therefore, that it had to base its consideration of the case exclusively on the terms of the written conciliation agreement approved by the Commission. The Commission had not voted on the terms of the alleged oral agreement; nor had the written conciliation agreement made reference to a supplemental oral agreement.

The court further noted that, to file a civil action against parties that violate the terms of a conciliation agreement, "the Commission need only establish that the person has violated, in whole or in part, any requirement of such a conciliation agreement...." See U.S.C. §437g(a)(5)(D). Since the LaRouche campaign admitted that it had never paid the civil penalty required by the conciliation agreement, the court found that "the FEC is entitled to declaratory relief in this action and receipt of an accelerated payment of \$15,000 from defendant CFL."

The Court further found that the candidate, Lyndon H. LaRouche, must also be held liable for the unpaid civil penalty. The court cited the letter of agreements that Mr. LaRouche had entered into with the FEC as a condition of matching fund eligibility. Under the agreements, both Mr. LaRouche and his campaign committee were held liable for any civil penalties assessed against his campaign.

Finding no merit to the campaign's counterclaim for damages resulting from "fraudulent inducement and fraudulent actions by the FEC," the court dismissed the counterclaim "for failure to state a claim upon which relief can be granted."

NEW LITIGATION

Republican Party of North Carolina v. FEC

Pursuant to 2 U.S.C. §437g(a)(8), the Republican Party of North Carolina (the Party) filed suit against the FEC for failing to take action, within 120 days, on an administrative complaint that the Party had filed against the Jim Hunt Committee, Governor Hunt's principal campaign committee for his 1984 Senate campaign. In the complaint, filed on April 20, 1984, the Party alleged that the campaign had violated the election law by using state property for Governor Hunt's Senate campaign without fully reimbursing the state.

The Party therefore asked the court to:

- Declare that the FEC's failure to act on the complaint within 120 days was contrary to law;
- Issue an order directing the FEC to take action on the complaint within 30 days, as specified by section 437g; and
- Retain jurisdiction over the Party's suit in the event that the FEC failed to take action on its administrative complaint.

U.S. District Court for the District of Columbia, Docket No. 84-2937, September 19, 1984.

Antosh v. FEC (Suit 3)

Pursuant to 2 U.S.C. §437g(a)(8)(A), Mr. James E. Antosh petitioned the district court to take action against the FEC for dismissing an administrative complaint Mr. Antosh had filed with the FEC on May 31, 1984. In the administrative complaint, Mr. Antosh had alleged that:

- The International Union of Operating Engineers and its separate segregated fund had violated 2 U.S.C. §441a(a)(2)(A) by making contributions in excess of \$5,000 to the primary campaign of Thomas P. Lantos, a 1982 Congressional candidate, and Mr. Lantos' principal campaign committee;
- Mr. Lantos and his principal campaign committee had, in turn, violated 2 U.S.C. §441a(f) by knowingly accepting the excessive contributions; and
- Mr. Lantos, his campaign treasurer, and his principal campaign committee had violated Commission Regulations by failing to report the excessive contributions accurately. See 11 CFR 104.14(d).

Mr. Antosh asked the court to:

- Declare that the FEC's dismissal of his administrative complaint was contrary to law; and
- Issue an order directing the FEC to act on the complaint within 30 days.

U.S. District Court for the District of Columbia, Docket No. 84-3048, October 1984.

COMPLIANCE

MUR 1605: Relationship Between Federation of Labor Unions and Its Members

On July 10, 1984, the Commission found no reason to believe that the political action committee (PAC) of a federation of labor organizations, the PACs of three federation members and the treasurers of the four PACs violated the election law by: a) failing to disclose their alleged affiliated relationship on their Statements of Organization or b) making contributions in excess of the Act's limitations to seventeen candidates for federal office.

Complaint

On December 2, 1983, an individual filed a complaint against the respondents, which alleged that the federation controlled and maintained the unions and their PACs. Consequently the four PACs were affiliated. The complainant claimed that the PACs had failed to disclose their affiliated status and had made contributions in excess of the limits they allegedly shared as affiliated committees.

General Counsel's Report

Citing the legislative history of the Act's affiliation provision, the General Counsel's Report stated that, during consideration of proposed amendments to the Act in 1976, Congress made clear that it did not intend the affiliation provision to apply to two federations of organizations: the AFL-CIO, a federation of labor organizations (one of the respondents in this action), and the Chamber of Commerce, a federation of business associations. (The general rule under what became 2 U.S.C. §441a(a)(5) is that political committees are affiliated if they are established, financed, maintained or controlled by the same organization.) Congress' intent was later incorporated into FEC Regulations at 100.5 (g)(2)(i)(B) and (C). Subsection B regulates the relationship between a union and its state and local bodies; subsection C regulates the relationship between an organization of unions and its state and local bodies. In

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past decisions,* the Commission has interpreted these provisions to mean that, although the federation's PAC and the PACs of its state and local bodies are affiliated, and the federation's member unions and their state and local bodies are affiliated, the federations' PACs are not affiliated with the PACs of the member unions.

Moreover, even assuming that section 441a(a)(5) were applicable to the respondents' PACs, the report contended that the facts presented by the complainant did not support his claim that the federation controlled and maintained the member unions and their PACs. The General Counsel therefore recommended that the Commission find no reason to believe the Act had been violated by the respondents.

Commission Determination

The Commission voted to accept the General Counsel's recommendation and, on July 10, 1984, found no reason to believe that the PACs or their treasurers had violated the Act.

**The FEC reached the same conclusion in two earlier complaints: MURs 354 and 783.*



UPDATED PUBLICATIONS FOR STATE AND LOCAL ELECTION OFFICIALS

Two recent publications are available to state and local election officials:

- Election Directory 84 includes the name, address and telephone number of over 400 key federal, state and local election officials. \$2.25 per copy; order no. 052-006-00031-7.
- Campaign Finance Law 84 summarizes state campaign finance laws and provides comparative charts on: campaign finance reporting requirements; contribution and solicitation limits; and special tax and public financing provisions. \$9.50 per copy; order no. 052-006-00030-9.

Write the Superintendent of Documents, Government Printing Office, Washington, D.C. 20402, making reference to the publication and its order number.

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