

# RECORD

June 1987

999 E Street NW Washington DC 20463

Volume 13, Number 6

## COMMISSIONERS

### GARTNER NAMED SPECIAL DEPUTY TO FEC

On April 3, 1987, Secretary of the Senate Walter J. Stewart designated David G. Gartner as his Special Deputy to the FEC. (Under the election law, the Secretary of the Senate serves as an ex-officio Commissioner.) Mr. Gartner replaces Scott E. Morgan, who served as Special Deputy to Jo-Anne Coe, Mr. Stewart's predecessor.

Prior to his appointment as Special Deputy, Mr. Gartner was an attorney in private practice. From 1978 until 1982, he served as a Commissioner with the Commodity Futures Trading Commission. Previously, Mr. Gartner worked on both the Senatorial and Vice Presidential staffs of the late Hubert H. Humphrey. His career also included serving as a Law Clerk with O'Connor and Hannan; as Assistant to former U.S. Representative Harold T. Johnson; as Assistant to the late U.S. Representative Steven Carter and as a reporter and correspondent for The Des Moines Register and Tribune.

Mr. Gartner has written articles for Commodities, The Financial Exchange, The New York Times and The Business Lawyer. He is a member of the District of Columbia Bar, the Virginia Bar, the U.S. Supreme Court Bar and the U.S. District Court Bar for the Eastern District of Virginia.

A native of Iowa, Mr. Gartner holds a Bachelor of Arts in Economics from the State University of Iowa and a Juris Doctor from the Washington College of Law at American University, Washington, D.C.

## REGULATIONS

### FEC ANNOUNCES AVAILABILITY OF NRWC'S PETITION FOR RULEMAKING

On April 23, 1987, the Commission decided to publish a notice in the Federal Register announcing the public availability of a petition for proposed rulemaking filed with the FEC in February 1987 by the National Right to Work Committee (NRWC). See 52 Fed. Reg. 16275.

In the rulemaking petition, NRWC asked the FEC to consider whether sections 114.3 and 114.4

of its rules, which govern partisan and nonpartisan communications by corporations and labor organizations, should be revised in light of the Supreme Court's decision in FEC v. Massachusetts Citizens for Life (MCFL) (107 S. Ct. 816(1986)). Specifically, NRWC argued that the MCFL decision held "that independent communications are not covered by §441b of the Act unless they constitute 'express advocacy.'" Consequently, in NRWC's view, those FEC rules regulating partisan and nonpartisan communications are unconstitutional.

Comments and statements in support of, or in opposition to, NRWC's petition must be filed by June 3, 1987. These written responses to the petition should be addressed to Ms. Susan E. Propper, Assistant General Counsel, 999 E Street, N.W., Washington, D.C. 20463; or call 202/376-5690 or toll free 800/424-9530. For copies of the petition, contact the FEC's Public Records Office at 202/376-3140 or toll-free 800/424-9530.

*continued*

## TABLE OF CONTENTS

### COMMISSIONERS

- 1 Gartner Named Special Deputy

### REGULATIONS

- 1 NRWC Rulemaking Petition Available
- 2 Hearing Canceled on Delegate Rules

### PUBLIC FUNDING

- 2 Gephardt and Babbitt Eligible for Public Funds

### ADVISORY OPINIONS

### CLEARINGHOUSE

- 5 Report on Accessibility of Polling Places

### PUBLICATIONS

- 5 Citizens Guide
- 5 Filing a Complaint

### COURT CASES

- 6 FEC v. Furgatch
- 6 FEC v. Clark
- 6 FEC v. Pryor for Congress Committee
- 6 New Litigation

### INDEX

## HEARING ON DELEGATE SELECTION RULES CANCELED

During April, the Commission canceled a public hearing on proposed revisions to its delegate selection rules because the agency received no requests to testify at the hearing, originally scheduled for April 22. (These rules govern contributions and expenditures made in connection with the selection of delegates to Presidential nominating conventions. See 11 CFR 110.14.)

On March 4, 1987, the Commission had published a notice in the Federal Register which announced the hearing date and solicited comments on the proposed revisions. See 52 Fed. Reg. 6580. The agency also published a summary of the proposed revisions and related issues in the April 1987 Record.

## PUBLIC FUNDING

### GEPHARDT AND BABBITT ELIGIBLE FOR PRIMARY MATCHING FUNDS

On April 24, 1987, Rep. Richard Gephardt, a Democratic Presidential candidate, became the first candidate to qualify for federal matching funds for the 1988 primary elections. On May 6, another Democratic candidate, former Arizona Governor Bruce Babbitt, also established matching fund eligibility.

Under the Presidential Primary Matching Payment Account, Presidential candidates may begin seeking eligibility for primary matching funds after January 1, 1987. 26 U.S.C. §9031 et seq. However, the U.S. Treasury may not make actual payments until after January 1, 1988. The maximum amount of matching funds an eligible candidate may receive during 1988 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). The limit may be as high as \$22 million in 1988,\* in which case Presidential primary candidates could qualify for approximately \$11 million in primary matching funds.

\*With an additional \$5 million allowed for fundraising costs, the total spending limit for 1988 could reach \$27 million.

The Commission's determinations followed a thorough review by the Audit Division of the threshold submissions made by Rep. Gephardt on March 31, 1987, and by Bruce Babbitt on April 10, 1987. To establish eligibility for matching funds, a Presidential primary candidate must raise in excess of \$5,000 from individuals in each of at least 20 different states. Although individual contributors may give up to \$1,000 to the candidate, only \$250 from each contributor may be matched with public funds. The candidate must document those contributions and must agree to comply with the election law and Commission Regulations.

## ADVISORY OPINIONS

### RECONSIDERATION OF ADVISORY OPINION 1982-42

On April 23, 1987, the Commission decided not to reconsider the conclusions of Advisory Opinion 1986-42, which the agency had issued to Dart & Kraft, Inc. on January 16, 1987.\* The opinion dealt with the affect of a corporate reorganization on the contribution limits and affiliated status of several separate segregated funds.\*\* The Commission did, however, vote to reissue a modified version of the opinion. Specifically, the Commission added the underlined words in the sentence below, thus revising lines 3-5 on page 6 of the opinion, as follows: "These facts demonstrate that, for purposes of the Act and Commission regulations, DKI established and continues to maintain an affiliated relationship with Premark."

\*The Commission's procedures for reconsidering an advisory opinion are spelled out in section 112.6 of FEC Regulations.

\*\*For a summary of AO 1986-42, see page 4 of the March 1987 Record.

The Record is published by the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. Commissioners are: Scott E. Thomas, Chairman; Thomas J. Josefiak, Vice Chairman; Joan Aikens; Lee Ann Elliott; Danny Lee McDonald; John Warren McGarry; Walter J. Stewart, Secretary of the Senate, Ex Officio; Donald K. Anderson, Clerk of the House of Representatives, Ex Officio. For more information, call 202/376-3120 or toll-free 800/424-9530.

## ALTERNATE DISPOSITION OF ADVISORY OPINION REQUEST

### AO 1987-9: Independent Expenditures Made By Committee Facilitating Earmarked Contributions

On May 7, 1987, the Acting General Counsel notified the requester by letter that the Commission had failed to approve an opinion by the requisite four-vote majority.

## ADVISORY OPINION REQUESTS

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

AOR	Subject
1987-10	Contributions to Presidential primary candidate's 1988 campaign used to retire debts of his 1984 Presidential campaign. (Date made public: April 22, 1987; Length: 3 pages)
1987-11	Disposal of excess campaign funds by deceased Senator's campaign committee. (Date made public: April 30, 1987; Length: 2 pages, plus 1-page supplement)
1987-12	Transfer of funds from candidate's state campaign to his new federal campaign. (Date made public: April 30, 1987; Length: 3 pages, plus 10-page supplement)

## 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 1987-7: Voter Guides Distributed to Public by Nonprofit Corporation

Voter guides which the United States Defense Committee (USDC), a nonprofit corporation, proposed to prepare and distribute to the general public would be governed by FEC rules pertaining to expenditures for such communications by non-

profit, nonpartisan organizations, rather than by the limited exception for such expenditures carved out by the Supreme Court in its recent ruling in *FEC v. Massachusetts Citizens for Life (MCFL)*.<sup>\*</sup> Under these FEC rules, USDC could sponsor a voter guide mailing to the general public that constituted a "grass roots" lobbying effort to obtain support for its positions on defense-related legislation before Congress. (This mailing would include preliminary survey results.) See 11 CFR 114.4(b)(5)(i) and (ii). USDC could not, however, sponsor two other mailings (described below), which would be distributed to the general public just before the primary elections. Those mailings would constitute partisan communications favoring the election of specific candidates who agreed with USDC's positions. The Commission noted that, to the extent its decision in this opinion was inconsistent with its decisions in AOs 1984-14 and 1983-43, this opinion superseded those earlier opinions.

The Commission was unable to reach a decision, by the requisite four-vote majority, on whether USDC's proposed publication of Congressional voting records would be permissible.

### Voter Guide: Proposed Mailings

USDC proposed using general treasury funds, which included payments from its corporate members, to finance voter guides that described the views of Congressional candidates on defense-related issues. The voter guides would consist of questions USDC posed to candidates concerning their positions on defense-related issues and the candidates' responses to those questions. The guides would not expressly advocate the election or defeat of any candidate. However, they might identify a candidate's party affiliation and indicate whether USDC favored or opposed each candidate's position on a particular issue.

After the candidates returned the questionnaires, USDC planned to send out two mailings to the general public which referred to the completed survey results:

1. USDC proposed mailing a letter and survey results to the general public and the constituents of specific Congressional districts. Mailed less than four weeks before a state's Congressional primary election, the letter would characterize each candidate's responses to the survey questionnaire as either right or wrong. The letter would also suggest that the recipient contact a candidate whose answers differed from USDC's positions and urge the candidate to change his or her mind before the primary. The letter would also

*continued*

<sup>\*</sup>For a summary of the Supreme Court's decision in this suit, see pages 4-6 of the February 1987 Record.

ask the public to thank those candidates who agreed with USDC's positions.

2. A follow-up mailing would be even more closely tied to specific candidates and primaries because it would be mailed shortly before primary elections. This mailing would focus on the issue positions of incumbents in specific Congressional districts and would be sent only to their constituents. The mailing would ask constituents to contact the candidates (both survey respondents and nonrespondents) and urge them to vote in accordance with their (i.e., USDC's) views. The letter would also advise recipients that an incumbent is "easier to convince...when he's looking for votes than...after he's safely in office."

### **FEC's Opinion**

In a recent ruling in FEC v. MCFL (107 S. Ct. 616 (1986)), the Supreme Court carved out a narrow exception for nonprofit corporations from "441b's restriction on independent spending." To be eligible for the MCFL exception, among other things, a nonprofit corporation must have a policy of not accepting contributions from business corporations or labor unions. By contrast, in USDC's case, since USDC has accepted funds from corporations, its communications to the general public are not eligible for the MCFL exception.

However, as a nonpartisan, nonprofit corporation, USDC is eligible, under FEC rules, to prepare and distribute voter guides to the general public, provided the guides do not favor one candidate or political party over another. 2 U.S.C. §441b; 11 CFR 114.4(b)(5)(i) and (ii). With regard to the proposed mailings, the first one, containing the preliminary results of the USDC candidate survey, would be permissible under these rules because it would be viewed as a "grass roots" -- or issue advocacy--effort. However, the two subsequent proposed mailings, which would include a letter and a compendium of the survey results, would not be permissible because of their context and reference to the results. The mailings: 1) would be sent out close to the primary election and 2) would contain, in the accompanying letter, election messages and advocacy concerning specific candidates in the upcoming election. Commissioner Lee Ann Elliott filed a dissent. (Date issued: April 6, 1987; Length: 8 pages, including dissent)

### **AO 1987-8: Multimedia Presentation of Presidential Candidate Interviews and Profiles**

The American International Group, Inc., (AIG), a U.S. corporation, may act as the exclusive advertising sponsor of a project involving interviews with Presidential candidates, to be undertaken by U.S. News and World Report (U.S. News), a media partnership, during 1987 and 1988.

U.S. News plans to interview approximately 12 major Presidential candidates and to disseminate the interviews through articles published in its magazine, U.S. News and World Report, through a television series synchronized with the magazine articles and through a book, which will also include background information on the candidates. In acting as the advertising sponsor of the project, AIG will pay U.S. News a sponsorship fee of \$4,377,500 in exchange for certain advertising benefits (e.g., ad space in issues of U.S. News and World Report which carry the interviews).

Although the election law prohibits corporations from making contributions or expenditures in connection with federal elections, costs incurred by U.S. News for the television and magazine interviews would qualify as news story expenses, which are specifically exempted from the election law's definitions of contribution and expenditure.\* 2 U.S.C. §§ 441b and 431(9)(A)(i). Furthermore, AIG's sponsorship is a permissible activity because AIG will be involved in the project only as a commercial advertiser--not as an agent attempting to influence federal elections. In this regard, the Commission noted that AIG will exercise no control over: the selection of candidates to be interviewed, the content of their interviews, the manner in which the interviews are produced and distributed or the markets where the television series will be aired. Nor will AIG absorb any of the project's production costs.

Although U.S. News' proposed distribution of the interviews in book form would not be covered by the news exemption, U.S. News could nevertheless distribute a complimentary copy of the book to each of the delegates at the Republican and Democratic national Presidential nominating conventions. FEC rules governing Presidential nominating conventions specifically permit businesses to distribute promotional items of nominal value at such conventions. 11 CFR 9008.7(c)(2)(i). AIG could act as an advertising sponsor for this permissible activity.

Additionally, in distributing complimentary books to candidates who participated in the interview series, U.S. News would not be making prohibited in-kind corporate contributions to their campaigns. The complimentary copies would represent merely a token of U.S. News' appreciation for their participation in the project. Similarly, AIG could distribute the book to its clients, employees and associated businesses.

The Commission cautioned that its opinion was based solely on the facts presented in AIG's advisory opinion request. (Date issued: May 4, 1987 ; Length: 8 pages).

---

\*The news story exemption covers only those qualified communications "distributed through the facilities of any broadcasting station, newspaper, magazine, or other periodical publication. . . ."

## CLEARINGHOUSE

### REPORT ON ACCESSIBILITY OF POLLING PLACES TO THE HANDICAPPED AND ELDERLY

On April 30, 1987, the Commission submitted to Congress a report entitled Polling Place Accessibility in the 1986 General Election. Prepared by the FEC's National Clearinghouse on Election Administration, this compendium is the first of five reports--to be issued between 1987 and 1995--on the accessibility of polling places to the elderly and handicapped. The reports are mandated by the Voting Accessibility for the Elderly and Handicapped Act of 1984, a law which requires the Commission to gather and compile state-by-state information on obstacles faced by the disabled when they go to the polls.

A national picture emerges from the compilation of state-by-state figures on polling place accessibility contained in the report. There are 157,922 voting places in the United States, of which 82 percent have been inspected to determine their accessibility. Some 34,595 polling places (27 percent of those inspected) were reported as being inaccessible to the disabled. Among the major problems were stairs without ramps, obstructed passages to polling place entrances and inadequate parking facilities.

The FEC report discourages comparisons between states because the data collection and reporting techniques used by election officials varied from one state to another. Also, some jurisdictions conducted polling place inspections during or after the 1986 general election, while others made their evaluations in 1985 and implemented changes prior to the 1986 election.

The Commission report says that most state election officials have made positive efforts to inspect and improve polling places. However, since some states got a late start in making their polling places more accessible to the elderly and handicapped, the FEC expects to document more substantial progress in its next report. That report should present a more accurate national picture and provide a basis for comparisons between states.

To obtain copies of Polling Place Accessibility in the 1986 General Election, contact the FEC's Clearinghouse toll free at 800/424-9530 or locally at 202/376-5670.

## PUBLICATIONS

### TWO NEW PUBLICATIONS AVAILABLE

The Commission recently published two brochures for the general public--Supporting Federal Candidates: A Guide for Citizens and Filing a Complaint. Copies of these and other brochures are available to anyone, free of charge. Political committees may wish to order copies of the Guide for Citizens for their staff and volunteer workers. To order copies, contact the Information Services Division, FEC, 999 E Street, N.W., Washington, D.C. 20463; or call 202/376-3120 or toll-free 800/424-9530.

#### Supporting Federal Candidates: A Guide for Citizens

This fully illustrated brochure explains how citizens can take an active part in the federal election process by making contributions (including joint contributions and contributions by family members), volunteering, providing business services, making independent expenditures or joining with others and acting as a group.

The brochure also familiarizes citizens with agency services. For example, it describes:

- o The kinds of information the FEC's Office of Public Records makes available on a candidate's campaign activity; and
- o The procedures citizens must follow to file complaints with the FEC, if they believe violations of the election law have occurred.

#### Filing a Complaint

This brochure explains how to file a complaint with the Commission and describes how the FEC handles complaints. A special chart accompanying the text depicts the entire complaint process. The brochure also explains the election law's confidentiality provisions, and it describes what complainants can do when they disagree with FEC actions.

## COURT CASES

### FEC V. FURGATCH

On April 23, 1987, the U.S. Court of Appeals for the Ninth Circuit denied Mr. Harvey Furgatch's petition for a rehearing of the court's decision in a suit brought against Mr. Furgatch by the FEC (FEC v. Furgatch, Civil Action No. 85-5524). The appeals court also rejected Mr. Furgatch's suggestion for a rehearing of the suit by a full panel of its judges.

In its January 1987 decision, the appeals court confirmed the FEC's claim that Mr. Furgatch should be held liable for violations of the election law resulting from: 1) Mr. Furgatch's failure to report as independent expenditures his payments for newspaper ads advocating President Jimmy Carter's defeat in the 1980 general election and 2) his failure to state in one of the ads that the communication was not authorized by a candidate or a candidate's committee. For a summary of the appeals court's decision, see page 5 of the March 1987 Record.

### FEC v. JOHN R. CLARK, JR.

On April 23, 1987, the U.S. District Court for the Middle District of Florida issued a consent order in FEC v. John R. Clark, Jr. (CA No. 86-1841-CIV-T-17B). In the order, the FEC and Mr. Clark agreed that:

- o Mr. Clark had entered into a conciliation agreement with the FEC in which he admitted violating section 441f of the election law by knowingly permitting his name to be used for a contribution made in the name of another person. In the conciliation agreement, Mr. Clark also agreed to pay a \$250 civil penalty by January 25, 1985.
- o Mr. Clark had violated the conciliation agreement by failing to pay the civil penalty on time.
- o Mr. Clark paid the civil penalty only after the Commission had notified him that the agency had filed suit against him for failure to pay the penalty.

Finally, Mr. Clark assured the court that, in the future, he would fully comply with the election law.

### FEC v. PRYOR FOR CONGRESS COMMITTEE

On March 26, 1987, the U.S. District Court for the Western District of Pennsylvania issued an order of dismissal in FEC v. Pryor for Congress Committee (Civil Action No. 86-0580), after the FEC requested that the suit be withdrawn.

## NEW LITIGATION

### Congressman Stark v. FEC, et al.

Pursuant to 2 U.S.C. §437g(a)(8)(C), Congressman Fortney H. (Pete) Stark asks the court to declare that the FEC acted contrary to law by failing to act on his administrative complaint within 120 days after he filed it in October 1986. Congressman Stark's complaint alleged that certain excessive contributions made to David M. Williams' 1986 Congressional campaign by the American Medical Association Political Action Committee (AMPAC), the separate segregated fund of the American Medical Association (AMA), resulted in violations of the election law by both parties.

Congressman Stark further asks the court to:

- o Issue an order directing the FEC to act on the complaint within 30 days, as required by 2 U.S.C. §437g;
- o Declare that Commissioner Lee Ann Elliott should recuse herself from any further participation in the FEC's consideration of the complaint, consistent with Canon 4 of the Canons of Judicial Ethics; and
- o Retain jurisdiction over the suit, so that, if the FEC fails to act on his complaint, Congressman Stark could bring a separate suit against defendant AMPAC. (In a stipulation filed with the court on May 8, 1987, Mr. Stark agreed to voluntarily dismiss his claim against AMA and AMPAC, both defendants in the suit.)

U.S. District Court for the District of Columbia, Civil Action No. 87-1024, April 14, 1987.

### Harvey Furgatch v. FEC (Second Suit)

Pursuant to 2 U.S.C. §437g(a)(8), Mr. Harvey Furgatch asks the court to declare that the FEC acted contrary to law by failing to act on an administrative complaint within 120 days after he filed it.

Mr. Furgatch further asks the court to order the Commission to:

- o Disclose all actions the agency has taken on his administrative complaint; and
- o Act on the complaint within 30 days, as required by 2 U.S.C. §437g.

U.S. District Court for the District of Columbia, Civil Action No. 87-0798, April 1, 1987.

### FEC v. Citizens for the President '84

The Commission asks the district court to declare that Citizens for the President '84 (the Committee), a political committee, and the Committee's treasurer, Thomas Allen Bayer, violated the election law by:

- o Failing to file the Committee's 1984 year-end report on time, in violation of 2 U.S.C. §434(a)(4)(A)(i); and
- o Failing to adequately disclose certain disbursements -- i.e., failing to specify on their reports whether certain disbursements (e.g., for printing, mailings, advertising and consulting) were made on behalf of a specific federal candidate, in violation of 2 U.S.C. §434(b)(5)(A) and 11 CFR 106.1(a).

The FEC also asks the district court to:

- o Assess a civil penalty against each defendant for the greater of \$5,000 or the amount involved in each violation by each defendant; and
- o Permanently enjoin defendants from similar violations of the election law in the future.

U.S. District Court for the Northern District of Ohio, Civil Action No. C87-1040Y, April 28, 1987.

- 1987-6: Trade association PAC's combined dues payment/solicitation plan prohibited, 5:5
- 1987-7: Voter guides distributed to public by nonprofit corporation, 6:3
- 1987-8: Multimedia presentation of Presidential interviews and profiles, 6:4

#### COURT CASES

- Common Cause v. FEC (fourth suit), 2:6; fifth suit, 2:9
- Congressman Stark v. FEC, 6:6
- FEC v. Americans for Jesse Jackson, 2:9
- FEC v. Beatty for Congress Committee, 3:6
- FEC v. Citizens for the President '84, 6:6
- FEC v. Citizens Party, 1:8; 2:8
- FEC v. Congressman Charles E. Rose, 2:7
- FEC v. Ernest Halter and AIDS, 4:7
- FEC v. Furgatch; FEC v. Dominelli, 3:5; 6:6
- FEC v. John R. Clark, Jr., 2:8;
- FEC v. Jolyn Robichaux, et al., 2:9
- FEC v. Mark Barry, 4:7
- FEC v. MCFL, 2:4
- FEC v. Pryor for Congress Committee, 6:6
- FEC v. Ted Haley Congressional Committee, 5:6
- FEC v. 1984 Victory Fund, 3:6
- Furgatch v. FEC (second suit), 6:6

## INDEX

This cumulative index lists advisory opinions, court cases and 800 Line articles published in the Record during 1987. The first number in the citation refers to the "number" (month) of the Record issue; the second number, following the colon, indicates the page number in that issue.

#### OPINIONS

- 1986-37: Presidential candidate appearances at convention of nonprofit corporation, 1:6
- 1986-38: Individual's financing of media ads to promote conservative candidates, 1:7
- 1986-39: Excess campaign funds used to establish trust fund for minor, 2:3
- 1986-40: Corporate donations to state party committee's building fund, 2:3
- 1986-41: Trade association's plan to compensate employees who make contributions, 2:4
- 1986-42: Affect of corporate reorganization on PACs, 3:4
- 1986-44: Contributions to PAC matched with corporate donations to charity, 3:4
- 1986-45: Interest payments by his committee to candidate, 4:4
- 1987-1: Campaign's compensation of lost wages to candidate prohibited, 4:5
- 1987-2: Campaign's purchase of car for candidate's reelection and official duties, 4:5
- 1987-3: Refund for terminated Presidential campaign, 4:6
- 1987-4: Excess campaign funds transferred from individual's 1986 to his 1984 campaign, 5:4
- 1987-5: Solicitability of membership organization's members, 5:5

#### 800 LINE

- After the election: winding down, 3:9
- Personal financial reports, 5:7

#### CHANGE OF ADDRESS

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.

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.

**FEC FORMS AND STATEMENTS REVISED**

The Federal Election Commission has revised the following FEC forms:

- o Form 1 (Statement of Organization)
- o Form 2 (Statement of Candidacy)
- o Form 3 (Report of Receipts and Disbursements for an Authorized Committee)
- o Form 3X (Report of Receipts and Disbursements for Committees Other Than Authorized Committees)

The layout and the instructions for these forms have been modified. However, the information that committees must disclose remains the same.

Disregard all the old forms. Copies of new reporting forms will be mailed to all applicable registered committees along with the July reporting notice. Additional forms may be requested from the FEC. Committees may also use photocopies of blank forms.

Questions and requests for forms should be addressed to the FEC's Information Services Division, 202/376-3120 or, toll free, 800-424-9530.

**FALL CONFERENCE SERIES ON ELECTION LAWS**

During Fall 1987, the Federal Election Commission will cosponsor a series of three conferences with state election offices. The conferences will present workshops on candidate campaigns, party and PAC activity, contributions and reporting. The conference schedule is detailed below. For more information on the series, contact the FEC's Information Services Division at: 202/376-3120 or toll-free 800/424-8430.

**Conference Schedule**

September 16-18	Burlington, Vermont FEC and Vermont Secretary of State
October 16	Madison, Wisconsin FEC and Wisconsin State Election Board
November 16-17	Austin, Texas FEC and Texas Secretary of State

FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, D.C. 20463

Official Business

Bulk Rate Mail  
Postage and Fees Paid  
Federal Election Commission  
Permit Number G-31

