

RECORD

November 1985

1325 K Street NW Washington DC 20463

Volume 11, Number 11

REGULATIONS

SUNSHINE ACT RULES PRESCRIBED

On October 1, 1985, the Commission published in the Federal Register the final, revised version of its Sunshine Act Regulations. See 11 CFR Part 2. Approved by the Commission on September 26, 1985, the rules of 11 CFR Parts 2 and 3 have been modified and consolidated into a single part, called Part 2. See 50 Federal Register 39968. The revised rules:

- o Provide a more complete statement about matters which may be discussed in closed meetings (i.e., matters exempted from discussion in open meetings);
- o Clarify the procedures for closing meetings;
- o Provide new procedures for processing requests for transcripts and recordings of closed meeting discussions; and
- o Explain open meeting procedures more fully.

The Commission announced that the revised Sunshine Act Regulations will become effective on October 31, 30 days after their publication in the Federal Register. This 30-day period will allow FEC staff sufficient time to begin operating under the revised rules.

The major revisions to the Sunshine Act rules are highlighted below.

Exemptions from the Open Meeting Requirement

The revised rules clarify the distinction between matters that may be exempted from open meeting discussions under one of the discretionary exemptions in the Sunshine Act and matters that must be exempted under the confidentiality provision in the Federal Election Campaign Act (FECA) or other relevant statutes. This distinction is important because, under the Sunshine Act, the Commission has the power to waive a discretionary exemption and discuss a matter in public session. The confidentiality requirements of the FECA and other relevant statutes, however, may not be waived. This distinction also affects the procedures for public disclosure of information that no longer qualifies for the exemptions. See Transcripts and Recordings below.

In keeping with recent court decisions, the revised rules exempt from public meetings any discussions or materials that would reveal FEC enforcement guidelines because such disclosure

would risk circumvention of FEC rules.* The rules exempt, for example, discussions of investigatory techniques and audits, and documents (such as staff compliance manuals) that reveal compliance thresholds.

Procedures for Closing Meetings

The Commission has revised its procedures for closing meetings. The agency has also added a provision which allows parties to request that a Commission meeting be closed if their interests are directly affected by a discussion. A requester must: 1) submit a written request to the FEC's chairman and 2) specify those exemptions (listed under 11 CFR 2.4) that would permit closing the discussion. The Commission will then vote on the request. A statement accompanying the revised rules notes that this new procedure does not grant a requester the right to compel the closing of a meeting. Nor does the procedure entitle the requester to a hearing on the request or to otherwise participate in an FEC meeting.

Transcripts and Recordings

The revised rules explain more fully the Commission's procedures for releasing transcripts and recordings of closed meeting discussions, once relevant disclosure exemptions no longer apply.

continued

**See especially the district court's ruling in Fund for a Conservative Majority v. FEC, summarized on p. 3 of the June 1985 Record.*

TABLE OF CONTENTS

REGULATIONS	
1	Sunshine Act Rules Prescribed
2 FEDERAL REGISTER NOTICES	
2 ADVISORY OPINIONS	
COURT CASES	
4	<u>FEC v. Kirk Walsh</u> <u>for Congress Committee</u>
4	New Litigation
INFORMATION	
5	Campaign Finance Report Filing Offices

With regard to matters exempted under one of the discretionary exemptions provided by the Sunshine Act (11 CFR 2.4(b)), the Commission will determine at the end of each closed session whether the relevant exemption still applies. If the exemption can no longer be claimed, the Commission will review the transcript or tape to be sure no other exemption applies. Once reviewed, the materials will be made available to the public.

With regard to discussions of enforcement matters and other materials that cannot be made immediately available, the Commission will continue its past practice of reviewing material, on request, and releasing those portions that are no longer entitled to any exemption.

The rules have been slightly revised to indicate that closed session records will be retained for a minimum of two years, or one year after the conclusion of an enforcement matter, whichever is later. This provision conforms with the Sunshine Act's minimum requirement. In practice, however, the Commission retains such documentation indefinitely for historical purposes.

Definitions and Miscellaneous Provisions

The revised rules refine the definition of "meeting" by explaining those circumstances that would not constitute a "meeting" as, for example, notation voting by the Commissioners. (Notation voting, used to expedite consideration of routine matters, is a process whereby Commissioners note their approval or disapproval of a given matter on a memo circulated to all Commissioners.) Additionally, the rules make clear that the statements made by Commissioners and staff at meetings should not be construed as final FEC determinations or beliefs.

The revised rules explain that members of the press who plan to use cameras or large electronic recording equipment at FEC open sessions should notify the FEC's Press Officer in advance. The purpose of this requirement is to give the Press Officer an opportunity to coordinate news coverage under limited space conditions.

FEDERAL REGISTER

FEDERAL REGISTER NOTICES

Copies of this notice are available in the Public Records Office.

Notice Title

1985-11 11 CFR Parts 2 and 3: Sunshine Act Regulations: Final Rules; Announcement of Effective Date (50 Fed. Reg. 39968, October 1, 1985)

ADVISORY OPINIONS

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

1985-30 Activities of authorized candidate committee converted to multicandidate committee. (Date made public: September 17, 1985; Length: 1 page)

1985-31 Affiliation of insurance corporation and agencies for purposes of PAC solicitations. (Date made public: September 26, 1985; Length: 3 pages, plus 41-page supplement)

1985-32 Disclosure of costs for Congressional reception sponsored by two trade associations. (Date made public: October 9, 1985; Length: 1 page)

1985-33 Personal loans to candidate loaned to candidate's committee. (Date made public: October 10, 1985; Length: 1 page)

1985-34 Nonconnected PAC's purchase and use of life insurance policy on its chairman. (Date made public: October 15, 1985; Length: 2 pages)

The Record is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: John Warren McGarry, Chairman; Joan D. Aikens, Vice Chairman; Lee Ann Elliott; Danny Lee McDonald; Thomas E. Harris; Thomas J. Josefiak; Jo-Anne L. Coe, 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.

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 1985-24: Unincorporated Membership Organization Prohibited from Establishing Separate Segregated Fund

The National Football League (NFL), an unincorporated, nonprofit membership organization consisting of 28 professional football teams, may not use its treasury funds to establish, administer or solicit contributions to a separate segregated fund under 2 U.S.C. §441b(b)(2)(C). Since NFL may not establish a separate segregated fund (i.e., a political action committee or PAC), the Commission did not address the issue of which personnel would be solicitable by the proposed PAC. See 11 CFR 112.1(b).

Section 441b of the Act prohibits corporations* (including incorporated membership organizations) from making contributions or expenditures in connection with federal elections. As an exception to this broad prohibition, an incorporated organization may pay the costs of establishing and administering a separate segregated fund which may, in turn, solicit voluntary contributions from the corporation's solicitable class. See 2 U.S.C. §§441b(b)(2)(C) and 431(8)(B)(vi); 11 CFR 114.1(a)(2)(iii), 100.7(b)(10) and 100.8(b)(11). However, as an unincorporated membership organization, the NFL is not eligible for this exception. The different treatment that the election law accords unincorporated and incorporated organizations was upheld by both the U.S. Appeals Court for the Ninth Circuit and the Supreme Court in California Medical Association v. FEC, 641 F.2d 619, 630 (9th Cir. 1980), aff'd, 453 U.S. 182 (1981). (Date issued: September 23, 1985; Length: 5 pages)

*Organizations covered by the prohibition include: corporations with capital stock, national banks, incorporated membership organizations, corporations without capital stock, incorporated trade associations, incorporated cooperatives and labor organizations.

AO 1985-25: Reattribution of Excessive Contributions to Spouse

In May 1985, the Steve Bartlett Congressional Campaign Committee (the Committee), the principal campaign committee for Mr. Bartlett's House campaign, held a picnic fundraiser. Subsequently, some of the picnic ticket purchasers made additional contributions to the Committee which, when added to their ticket purchases, caused them to exceed their respective \$1,000 per election limits. As an alternative to refunding the excessive portion of a donor's contributions, the Committee may reattribute the excessive amount to a donor's spouse, provided the requirements outlined below are met.

Proposed Reattribution Procedure

Under the Committee's proposal, the Committee will send a letter and contribution reattribution form to any married individual who made excessive contributions to Mr. Bartlett's campaign and who did not attribute any portion of his/her contributions to a spouse. The letter will itemize the contributions and inform the donor of: 1) the election law's contribution limits and 2) the donor's option to attribute the excessive portion of the contributions to his/her spouse's contribution limit. The contribution reattribution form, which must be returned to the committee, will include: each spouse's signature and information on the contribution (date, amount and election).

Reattribution Requirements

Under FEC Regulations, a husband and wife may each contribute up to \$1,000 to the same candidate for the same election, even if they are a single-income family. If, however, they make a joint contribution by a single check, each spouse must sign the check or an accompanying statement specifying the amount to be attributed to each one. 11 CFR 110.1(i)(1) and 100.7(a).

The Committee's proposed letter and reattribution form meet these requirements. However, to ensure that the reattribution procedure does not circumvent the Act's contribution limits, the Committee must also fulfill the following conditions:

- o Before mailing the letter and form, the Committee should have a reasonable basis for concluding that the contributions were made by a married individual.
- o The Committee may seek a reattribution only if the aggregate contributions made by husband and wife do not exceed \$2,000 per election.
- o The Committee must revise the letter to inform the contributor that he or she may request a refund of the excessive amount rather than reattribute it to a spouse.
- o If a contributor and his/her spouse do not send back a signed form authorizing the reattribution

continued

tion, the Committee must refund the excessive portion of a contribution within 30 days of its receipt.

- o If the contributor requests a refund, the Committee must make it promptly, i.e., within 10 days.
- o The Committee must keep written, up-to-date records on relevant details of Committee requests for reattributions and the disposition of each.
- o The Committee must report all deposits and refunds of the excessive contributions. 2 U.S.C. §434(b); 11 CFR 103.3(b)(2).

(Date issued: September 30, 1985; Length: 4 pages)

COURT CASES

FEC v. KIRK WALSH FOR CONGRESS COMMITTEE

On September 20, 1985, the U.S. District Court for the Eastern District of Michigan, Southern Division, issued an opinion which held the Kirk Walsh for Congress Committee (the Committee) and its treasurer, Kirk Walsh, in contempt for failing to comply with a default judgment entered against the Committee in April 1985. (Civil Action No. 84-9802)

In the April 1985 default judgment, the court had ordered the Committee, Mr. Walsh's principal campaign committee for his 1980 House campaign, to take the following actions within 30 days:

- o File a 30 day post-general election report for 1980 and mid-year and year-end reports for 1981, 1982 and 1983;
- o Pay a \$5,000 civil penalty to the U.S. Treasury; and
- o Pay court costs incurred by the FEC in pursuing the action.

In its contempt order, the court ordered the Committee and Mr. Walsh to comply with the default judgment by October 11, 1985. In the event the Committee failed to meet the deadline, the court would assess a fine of \$2,000 and \$100 per day until the Committee fully complied with the court's orders. (As of October 11, 1985, the respondents had not complied with the court's order.)

The court also ordered the Committee and Mr. Walsh to pay costs and attorney fees incurred by the Commission in bringing this action.

NEW LITIGATION

FEC v. NCPAC (Second Suit)

The FEC filed suit against the National Conservative Political Action Committee (NCPAC), a nonconnected political committee, and its treasurer, Leif E. Noren, with regard to independent expenditures NCPAC made to advocate President Reagan's reelection in 1984. As part of its independent expenditure activities conducted between April and July 1984, NCPAC mailed solicitation materials to approximately 955,750 persons.

The FEC asks the district court to:

- o Declare that defendants violated 2 U.S.C. §41d(a)(3) by failing to include on the solicitation materials a statement clearly identifying NCPAC as the sponsor of the solicitation mailings;
- o Assess a civil penalty against defendants amounting to the greater of \$5,000 or an amount equal to 100 percent of the amount involved in the violation (approximately \$373,000); and
- o Permanently enjoin defendants from further violations of the election law.

U.S. District Court for the District of Columbia, Civil Action No. 85-2898, September 12, 1985.

FEC v. John A. Dramesi for Congress

The FEC asks the district court to declare that Mr. Dramesi's 1982 House campaign, John A. Dramesi for Congress Committee (the Committee), and its treasurer, Russel E. Paul, violated the election law by accepting an excessive contribution from the New Jersey Republican State Committee and by failing to refund the excessive portion of the contribution (i.e., \$4,000) to the state party committee. See 2 U.S.C. §441a(f); 11 CFR 103.3(b)(1) and (2). At the time the state party committee made the \$5,000 contribution, it had not achieved multicandidate committee status and was, therefore, only eligible to make a \$1,000 contribution to the Committee.*

The FEC further asks the court to:

- o Assess a \$5,000 civil penalty against the Committee or an amount equal to 100 percent of the amounts involved in the violation; and
- o Order the Committee and its treasurer to refund the excessive portion of the contribution to the state party committee.

U.S. District Court for the District of New Jersey, Civil Action No. 85-4039, August 19, 1985.

*Multicandidate committees may contribute up to \$5,000 per election to a candidate's authorized committee(s). To achieve multicandidate committee status, a state party committee must have more than 50 contributors and have been registered for at least six months. 2 U.S.C. 441a(a)(4); 11 CFR 100.5(e)(3).

INFORMATION

Copies of federal campaign finance reports may be reviewed and copied by the public at the locations listed below. Note that the federal election law places restrictions on the use of information copied from campaign finance reports and statements. They "may not be sold, or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees." 2 U.S.C. §438(a)(4).

FEDERAL RECORDS OFFICES

ALL REPORTS

Public Records Office
Federal Election Commission
toll free 800/424-9530 \$.05-.15/pg.

U.S. SENATE REPORTS

Office of Public Records
Office of the Secretary of the Senate
Hart Senate Office Bldg., Room 232
Washington, D.C. 20510
202/224-0322 \$.10/pg.

U.S. HOUSE OF REPRESENTATIVES REPORTS

Office of Records and Registration
Office of the Clerk of the House
Longworth House Office Bldg., Rm. 1036
Washington, D.C. 20515
202/225-1300 \$.10/pg.

STATE RECORDS OFFICES

ALABAMA (FEC Computer Access)

Elections Division
Office of the Secretary of State
Room 103, Capitol Building
Montgomery, AL 36130
205/261-3124 \$.150/pg.

ALASKA

Office of the Lt. Governor
State Capitol, Room 313
Juneau, AK 99811
907/465-3520 \$.25/pg.
Mailing address:
State of Alaska, Pouch AA
Juneau, AK 99811

ARIZONA

Office of the Secretary of State
State Capitol, West Wing, 7th Floor
1700 West Washington
Phoenix, AZ 85007
602/255-8683 \$.50/pg.

ARKANSAS

Elections Division
Office of the Secretary of State
State Capitol Building, Room 026
Little Rock, AR 72201
501/371-5070 \$.50/pg.

CALIFORNIA (FEC Computer Access)

Political Reform Division
Office of the Secretary of State
1230 J Street, Room 219
Sacramento, CA 95814
916/322-4880 \$.30/pg.
Mailing address:
P.O. Box 1467
Sacramento, CA 95807

FEC Computer Access Only

Corporations Office
Office of the Secretary of State
Room 4001
107 Broadway
Los Angeles, CA 90012
213/620-3104

COLORADO (FEC Computer Access)

Elections Division
Office of the Secretary of State
1560 Broadway, Suite 200
Denver, CO 80202
303/866-2041 \$.50/pg.

CONNECTICUT

Elections Division
Office of the Secretary of State
30 Trinity Street, Room 114
Hartford, CT 06106
203/566-3059 \$.10/pg.

DELAWARE

Office of the Secretary of State
Townsend Building
Dover, DE 19901
302/736-4111 \$.125/pg.
Mailing address:
P.O. Box 1401
Dover, DE 19901

DISTRICT OF COLUMBIA

Office of Campaign Finance
Landsburg Building, Room 340
420 7th St., N.W.
Washington, D.C. 20004
202/727-2410 \$.10-.15/pg.

FLORIDA

Division of Elections
Office of the Secretary of State
The Capitol, Room 1801
Tallahassee, FL 32301
904/488-7690 \$.10/pg.

GEORGIA (FEC Computer Access)

Elections Division
Office of the Secretary of State
State Capitol, Room 110
Atlanta, GA 30334
404/656-2871 1st copy free
2nd+\$.25/pg.

HAWAII

Campaign Spending Commission
State Capitol, Rm. 008
Honolulu, HI 96809
808/548-5411 \$.25/pg.
Mailing address:
P.O. Box 501
Honolulu, HI 96809

IDAHO

Elections Division
Office of the Secretary of State
205 State House
Boise, ID 83720
208/334-2852 \$.25/pg.

ILLINOIS (FEC Computer Access)

State Board of Elections
1020 South Spring Street
Springfield, IL 62704
217/782-4141 \$.50/pg.
Mailing address:
P.O. Box 4187
Springfield, IL 62708

State Board of Elections
Suite 14-100
100 West Randolph Street
Chicago, IL 60601
312/917-6440

INDIANA

Office of the Secretary of State
State House, Room 201
Indianapolis, IN 46204
317/232-6531 \$.15/pg.

IOWA

Campaign Finance Disclosure
Commission
507 10th Street, 5th Floor
Des Moines, IA 50309
515/281-4411 \$.10/pg.

KANSAS

Office of the Secretary of State
State House, Room 234 North
Topeka, KS 66612
913/296-2236 \$.25/pg.

KENTUCKY

Registry of Election Finance
1604 Louisville Road
Frankfort, KY 40601
502/564-2226 \$.10/pg.

LOUISIANA

Elections Division
Office of the Secretary of State
7051 Florida Boulevard
Baton Rouge, LA 70816
504/922-0415 \$.10/pg.
Mailing address:
P.O. Box 94125
Baton Rouge, LA 70804-9125

MAINE

Bureau of Elections
Office of the Secretary of State
State Office Building, Room 221
Augusta, ME 04333
207/289-3501 \$.10-.20/pg.
Mailing address:
Bureau of Elections
Station 101
Augusta, Maine 04333

MARYLAND

State Administrative Board
of Election Laws
11 Bladen Street
Annapolis, MD 21404-0231
301/269-3711 \$.10/pg.
Mailing address:
P.O. Box 231
Annapolis, MD 21404-0231

MASSACHUSETTS (FEC Computer Access)

Division of Public Records
Office of the Secretary of State
1701 McCormack Building
One Ashburton Place
Boston, MA 02108
617/727-2832 \$.20/pg.

MICHIGAN (FEC Computer Access)

Elections Division
Office of the Secretary of State
4th Floor, Mutual Bldg.
208 N. Capitol Avenue
Lansing, MI 48918
517/373-2540 \$.16/pg.
Mailing address:
P.O. Box 20126
Lansing, MI 48901

MINNESOTA

Elections Division
Office of the Secretary of State
180 State Office Building
St. Paul, MN 55155
612/296-2805 \$.25/pg.

MISSISSIPPI

Office of the Secretary of State
401 Mississippi Street, Room 223
Jackson, MS 39201
601/359-1350 \$.30-.60/pg.
Mailing address:
P.O. Box 136
Jackson, MS 39205

MISSOURI

Division of Campaign Reporting
Office of the Secretary of State
Truman Office Building, 8th Floor
Jefferson City, MO 65102
314/751-3077 \$.15-.50/pgs.
Mailing address:
P.O. Box 1370
Jefferson City, MO 65102

MONTANA

Office of Political Practices
1205 8th Avenue
Helena, MT 59620
406/444-2942 \$.10/pg.

NEBRASKA

Office of the Secretary of State
State Capitol, Suite 2300
Lincoln, NE 68509
402/471-2554 \$1.00/pg.

NEVADA

Office of the Secretary of State
Capitol Complex
Carson City, NV 89710
702/885-5203 \$.50/pg.

NEW HAMPSHIRE

Office of the Secretary of State
State House, Room 204
Concord, NH 03301
603/271-3242 \$.15/pg.

NEW JERSEY

Elections Division
Department of State
107 West State Street
Trenton, NJ 08625-0304
609/292-3760 \$.10-.50/pg.

FEC Computer Access Only

New Jersey Election Law
Enforcement Commission
28 State Street, Suite 1215
Trenton, NJ 08625-0185
609/292-8700

NEW MEXICO

Office of the Secretary of State
Room 400
Executive-Legislative Building
Santa Fe, NM 87503
505/827-3620 \$.10/pg.

NEW YORK

State Board of Elections
One Commerce Plaza, 18th Floor
Albany, NY 12260
518/474-8200 \$.10/pg.
Mailing address:
P.O. Box 4
Albany, NY 12260

NORTH CAROLINA

Campaign Reporting Office
State Board of Elections
Raleigh Building, Rm. 809
5 West Hargett Street
Raleigh, NC 27601
919/733-2186 \$.25/pg.
Mailing address:
P.O. Box 1934
Raleigh, NC 27602

NORTH DAKOTA

Office of the Secretary of State
State Capitol, First Floor
Bismarck, ND 58505
701/224-2900 \$.25/pg.

OHIO

Office of the Secretary of State
30 East Broad Street, 14th Floor
Columbus, OH 43266-0418
614/466-2585 \$.10-1.00/pg.

OKLAHOMA

Office of the Secretary of State
101 State Capitol
Oklahoma City, OK 73105
405/521-3911 \$1.00/pg.

OREGON

Elections Division
Office of the Secretary of State
141 State Capitol
Salem, OR 97310
503/378-4144 \$.15/pg.

PENNSYLVANIA

Bureau of Commissions,
Elections & Legislation
305 North Office Building
Harrisburg, PA 17120
717/787-5280 \$.10/pg.

RHODE ISLAND (FEC Computer Access)

Elections Division
Office of the Secretary of State
State House, Room 218
Providence, RI 02903
401/277-2340 \$.15/pg.

SOUTH CAROLINA

State Election Commission
2221 Devine Street, Room 105
Columbia, SC 29205
803/758-2571 \$.25/pg.
Mailing address:
P.O. Box 5987
Columbia, SC 29250

SOUTH DAKOTA

Office of the Secretary of State
State Capitol Building, 2nd Floor
500 East Capitol
Pierre, SD 57501-5077
605/773-3537 \$.50/pg.

TENNESSEE

State Library & Archives
403 7th Avenue North, Room 200
Nashville, TN 37219
615/741-1075 \$.15/pg.

<p>TEXAS Disclosure Filing Division Office of the Secretary of State State Capitol, Room 127 Austin, TX 78711 512/475-5619 \$.15-.55/pg. Mailing address: P.O. Box 12697 Austin, TX 78711</p>	<p>VERMONT Office of the Secretary of State Redstone Building 26 Terrace Street Montpelier, VT 05602 802/828-2363 \$.10/pg.</p>	<p>WEST VIRGINIA Office of the Secretary of State State Capitol, Room 157-K Charleston, WV 25305 304/345-4000 \$.75-1.00/pg.</p>
<p>UTAH Office of the Lieutenant Governor State Capitol Building, Room 203 Salt Lake City, UT 84114 801/533-5111 \$.35/pg.</p>	<p>VIRGINIA State Board of Elections 101 Ninth Street Office Building Richmond, VA 23219 804/786-6551 \$.25/pg.</p>	<p>WISCONSIN State Elections Board 132 East Wilson Street, 3rd Floor Madison, WI 53702 608/266-8005 \$.15-.20/pg.</p>
	<p>WASHINGTON (FEC Computer Access) Public Disclosure Commission 403 Evergreen Plaza Olympia, WA 98504 206/753-1111 \$.10-.25/pg.</p>	<p>WYOMING Elections Division Office of the Secretary of State Capitol Building, Room 106 Cheyenne, WY 82002-0020 307/777-7378 \$.15-.50/pg.</p>

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.

INDEX

This cumulative index lists advisory opinions, court cases and 800 Line articles published in the Record during 1985. 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

- 1984-16: One Limit for Convention & Primary, 1:3
 1984-33: Fundraiser by Trade Association's Allied Members, 1:3
 1984-41: Corporate Payments for Media Ads, 2:1
 1984-48: Travel Reimbursements to State by Senate Campaign, 2:1
 1984-52: Refund of Illegal Contributions, 1:4
 1984-53: Real Estate Lessors as Federal Contractors, 1:4
 1984-54: Reporting/Limits for Candidate Elected in Primary, 1:5
 1984-55: Solicitation of Law Firm's Partners by Bank PAC, 1:5
 1984-56: Book Payments & Honorarium, 1:5
 1984-57: Corporate Communications on Legislation, 2:2
 1984-58: City's Claim for Reimbursement by Presidential Campaign, 2:3
 1984-59: Noncampaign Uses of Campaign Assets, 2:3
 1984-60: Campaign Debts Liquidated through Sale of Real Estate Assets, 3:1
 1984-61: Trade Association Solicitation Approvals, 3:2
 1984-62: Campaign Firm's Slate Mail Program, 5:4
 1984-63: Savings and Loan Association's Solicitations, 3:2
 1985-1: Liquidation of Campaign Assets, 4:4
 1985-2: State Funds Transferred to Congressional Campaign, 4:5
 1985-3: Contributions to State Campaign by Subsidiary of Foreign Corporation, 4:5
 1985-4: Payments not Honorarium, 4:5
 1985-5: Contributions Made Before but Received After Election, 4:6
 1985-6: Affiliated PACs of Local/International Unions, 4:6
 1985-7: Solicitation of Wholesalers' Personnel, 5:4
 1985-8: Fundraising to Refund Illegal Contributions, 5:5
 1985-9: Excess Funds for University Programs, 5:5
 1985-10: Campaign Loan Liquidated by Candidate's Estate, 5:5
 1985-11: Trade Association's Non-solicitable Members, 6:4
 1985-12: Trade Association's Collecting Agents, 6:5
 1985-13: Transfers to Successor Candidate's Campaign, 7:5
 1985-14: National Party Committee's Media Program, 7:6
 1985-16: Prohibited Use of FEC Contributor Information, 7:6
 1985-17: Congressional Scholarship Trust, 8:3
 1985-18: Conversion to Federal PAC, 9:1
 1985-19: Purchase of Computer System by Committee and Corporation, 10:3
 1985-22: Excess Funds Used for Evening Attire, 10:3
 1985-23: PAC Established by Corporation Owned by Partnership with Federal Contract, 10:4

800 LINE

- Foreign Nationals, 5:8
 State and Local Party Activities, 8:4
 Supreme Court Rules on 26 U.S.C. §9012(f), 4:1
 Using Excess Campaign Funds, 2:4

COURT CASES

- Antosh v. FEC, 2:4
 Citizens for Percy '84 v. FEC, 1:6
 DCCC v. FEC, 2:6
 FCM v. FEC, 6:3
 FEC v. Anderson, 2:6; 8:8
 FEC v. Committee to Return Stack to Congress, 8:7
 FEC v. Furgatch; FEC v. Dominelli, 1:6
 FEC v. Gus Savage for Congress '82, 6:3
 FEC v. Hemenway for Congress Committee, 2:6
 FEC v. Liberal Party Federal Campaign Committee, 3:3
 FEC v. Massachusetts Citizens for Life, Inc., 10:7
 FEC v. NCPAC, 5:6
 FEC v. NRWC; NRWC v. FEC, 1:7
 FEC v. Kirk Walsh for Congress Committee, 6:3
 Alwin Hopfmann v. FEC, 7:7; 9:3
 LaRouche v. State Board of Elections, 8:7
 Maine Right to Life Committee v. FEC, 10:9
 National Congressional Club and Jefferson Marketing, Inc. v. FEC, 3:3
 NCPAC v. FEC, 10:9
 Orloski v. FEC, 2:5
 Sierra Club v. FEC, 9:3

FEDERAL ELECTION COMMISSION
 1325 K Street, N.W.
 Washington, D.C. 20463

Official Business

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

