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December 5, 2012

Daniel Buckley  
Senior Campaign Finance Analyst  
Reports Analyst Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Re:C00504969

Dear Mr. Buckley:

The purpose of this letter is to respond to your letter dated October 31, 2012, regarding the amended Statement of Organization of the McCaskill Victory Fund ("the Committee"). The amended Statement of Organization lists Women 2 Win, another joint fundraising committee, as a joint fundraising representative of the Committee. Your letter cites 11 C.F.R. 102.17(a)(1)(i), which states that a joint fundraising committee "shall not be a participant in any other joint fundraising effort," and you ask that the Committee verify its compliance with this regulation.

The Committee has complied with section 102.17(a)(1)(i). The regulatory language to which you refer was added by the Commission in 1991. As the Commission explained at the time:

This change corrects two problems. First, in cases where this has occurred, there was no explicit allocation formula for determining the amounts to be distributed to each of the participating original committees. Secondly, there has been confusion as to the amount that may be contributed to the fundraising representative for distribution among the participating committees.

Public Financing of Presidential Primary and General Election Candidates, 56 Fed. Reg. 35,895, 35,898 (July 29, 1991). Thus, this language was added to preserve the integrity of the contribution limits, by preventing a joint fundraising representative from separately managing different groups of participants at the same time. If a joint fundraising representative were to receive funds on behalf of more than one set of participants, donors would have no sure way of knowing how their funds would be allocated, or how much they may give. This concern is not raised in the case of Women 2 Win, where the allocation formula and total maximum contribution can be clearly understood and conveyed. Were the regulation to be read otherwise, the Committee would have no clear way to raise funds with other joint fundraising committees through the same event, which in turn would limit the committees' and donors' ability to associate with one another.

If you need any further information, please do not hesitate to contact us.

Very truly yours,  
Kathryn Jane Drennen  
Treasurer

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