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Bond Senate Victory Committee

August 20, 2004

Karen E. Trainer
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: C00403428

Dear Ms. Trainer:

This letter is to replace an earlier letter dated August 18, 2004.

This letter is in response to your inquiry regarding the Statement of Organization filed by the Bond Senate Victory Committee on July 7, 2004. You have questioned the use of a candidate name in the name of a political committee. You cite 2 U.S.C. § 432(e)(4) for the proposition that "any political committee which is not an authorized committee . . . shall not include the name of any candidate in its name." In previous discussions with staff from the National Republican Senatorial Committee, FEC staff has further cited 11 C.F.R. § 102.13(c)(1) in arguing that a joint fundraising committee is not an authorized committee. As outlined below, the Bond Senate Victory Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

The Bond Senate Victory Committee is a joint fundraising committee established pursuant to 11 C.F.R. § 102.17. Section 102.17(a) states specifically that a joint fundraising committee "shall be a reporting political committee and an authorized committee of each candidate for federal office participating in the joint fundraising activity." (Emphasis added). The Bond Senate Victory Committee is an authorized committee of Missourians for Kit Bond and the use of the candidate name in the committee name is appropriate.

Based on the unambiguous statement in 11 C.F.R. § 102.17 that joint fundraising committees are authorized committees, we have concluded that no amendment is necessary and that the use of a candidate name is proper under Commission regulations.

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Box 75103
DC 20013

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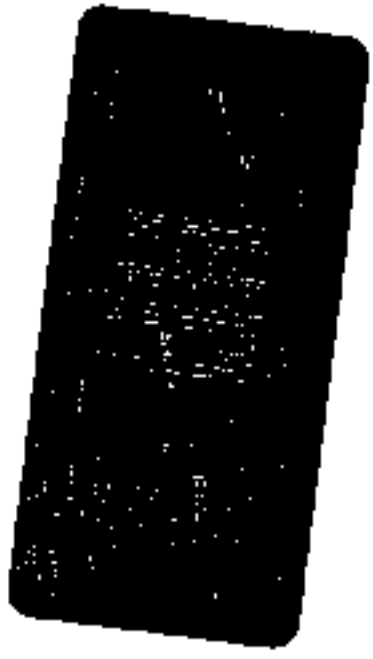
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Karen E. Trainer
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463



04 AUG 31 AM 10:44
DEPARTMENT OF THE SENATE

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