

U.S. Senate 22020791518  
22020791518  
**Wayne Allard**  
*Making a difference for Colorado*

RECEIVED  
SECRETARY OF THE SENATE  
PUBLIC RECORDS  
02 OCT 22 PM 2:51  
H.D.

October 10, 2002

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Gibson:

Attached please find a letter from Alex Vogel, General Counsel of the National Republican Senatorial Committee regarding the Allard Leadership Committee (ALC), an authorized committee of the Wayne Allard for U.S. Senate Committee, and the use of the candidate name.

There has been a question of the use of the candidate name in the naming of the authorized committee. The attached letter from Mr. Vogel confirms that the ALC is entitled to use the candidate name in its title.

Please contact me and Mr. Vogel if you have any questions.

Sincerely,



Wendy L. Evans  
Assistant Treasurer  
Wayne Allard for U.S. Senate Committee

## National Republican Senatorial Committee

SENATOR BILL FRIST, M.D.  
CHAIRMANMITCH BAINWOL  
EXECUTIVE DIRECTORRECEIVED  
SECRETARY OF THE SENATE  
PUBLIC RE

02 OCT 22 PM 2:51

October 21, 2002

John D. Gibson  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: C00375121

Dear Mr. Gibson:

This letter is in response to your inquiry regarding the Amended Statement of Organization filed by the Allard Leadership Committee on April 2, 2002. 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 Allard Leadership Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

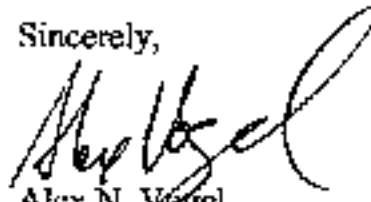
Allard Leadership Committee is a joint fundraising committee established pursuant to 11 C.F.R. § 102.17. Section 102.17(a) states specifically that a joint fundraising committee "shall be a reporting political committee and an authorized committee of each candidate for federal office participating in the joint fundraising activity." (Emphasis added). The Allard Leadership Committee is an authorized committee of Wayne Allard for U.S. Senate Committee 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.

Please feel free to contact me directly if you have any questions.

RONALD REAGAN REPUBLICAN CENTER  
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-8000

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Vogel", written in a cursive style.

Alex N. Vogel  
General Counsel

JERI THOMSON  
SECRETARY

PAULE A. GAVN  
SUPERINTENDENT

HART BUILDING  
SUITE 332  
WASHINGTON, DC 20510-7111  
PH: 202 224-6322

# United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

**THE PRECEDING DOCUMENT WAS:**

**HAND DELIVERED** 10-22-02  
Date of Receipt

**FAX (48-HOUR NOTICES)** \_\_\_\_\_  
Date of Receipt

**INSIDE MAIL** \_\_\_\_\_  
Date of Receipt

**RECEIVED FROM THE LEGISLATIVE RESOURCE  
CENTER** \_\_\_\_\_  
Date of Receipt

**RECEIVED FROM THE FEDERAL ELECTION  
COMMISSION** \_\_\_\_\_  
Date of Receipt

**FIRST CLASS MAIL** \_\_\_\_\_  
Postmarked

**REGISTERED/CERTIFIED MAIL** \_\_\_\_\_  
Postmarked

**NO POSTMARK**       **POSTMARK ILLEGIBLE**

**OTHER (Specify):** \_\_\_\_\_  
 **AIRBORNE EXPRESS**  
 **EXPRESS MAIL**  
 **FEDERAL EXPRESS**  
 **UPS** \_\_\_\_\_  
Postmark and/or Date of Receipt

RD      10-22-02  
Preparer      Date Prepared

22020791522  
~~22020791522~~

