

National Republican Senatorial Committee

SECRETARY OF THE SENATE
102 OCT 10 AM 11:44SENATOR BILL FRIST, M.D.
CHAIRMANMITCH BAINWOL
EXECUTIVE DIRECTOR

October 10, 2002

Christopher Morse
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: C00381566

Dear Mr. Morse:

This letter is in response to your inquiry regarding the Statement of Organization filed by the Alexander Victory Committee on August 30, 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 Alexander Victory Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

Alexander 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 Alexander Victory Committee is an authorized committee of Alexander for Senate, Inc. and the use of the candidate name in the committee name is appropriate.

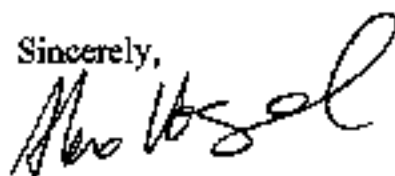
Based on the unambiguous statement in 11 C.F.R. § 102.17 that joint fundraising committees are authorized committees, we have concluded that no amendment is necessary and that the use of a candidate name is proper under Commission regulations.

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

PAID FOR AND A CREDITED TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Sincerely,

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

Alex N. Vogel
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SECRETARY OF THE SENATE
02 OCT 10 AM 11:43
RQ-4

Doug Robinson, Treasurer
Alexander Victory Committee
P.O. Box 75103
Washington, DC 20013

SEP 26 2002
10/10/02

Identification Number: C000381566

Reference: Statement of Organization, dated 8/30/02

Dear Mr. Robinson:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-According to 2 U.S.C. §432(e)(4), "any political committee which is not an authorized committee...shall not include the name of any candidate in its name." (Emphasis added). Please amend your Statement of Organization by changing the name of your political committee to exclude the name of the candidate.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Chris Morse".

Christopher Morse
Campaign Finance Analyst
Reports Analysis Division

JERI THOMSON
SECRETARY

PAMELA B. GAVIN
SUPERINTENDENT

HART BUILDING
SUITE 232
WASHINGTON, DC 20510-7113
Tel: F 202-224-0322

United States Senate

OFFICE OF THE SECRETARY

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