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02 DEC -1 PM 40

Hutchinson Victory Committee

P.O. Box 75103
Washington, DC 20013

December 3, 2002

Nicholas T. Ebinger
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

SECRETARY OF THE SENATE
02 DEC -1 PM 2:41

Re: C00365916

Dear Mr. Ebinger:

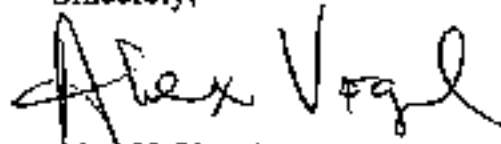
This letter is in response to your inquiry regarding the Statement of Organization filed by the Hutchinson Victory Committee on April 18, 2001. You have questioned the use of a candidate name in the name of a political committee. You cite 2 U.S.C. § 432(e)(4) for the proposition that "any political committee 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(e)(1) in arguing that a joint fundraising committee is not an authorized committee. As outlined below, the Hutchinson Victory Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

Hutchinson 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 Hutchinson Victory Committee is an authorized committee of Hutchinson for Senate 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.

Sincerely,

A handwritten signature in black ink that reads "Alex Vogel". The signature is written in a cursive style with a large, prominent "A" and "V".

Alex N. Vogel
General Counsel

JERI THOMSON
SECRETARY

PAMELA B. GAVIN
COMPTROLLER

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United States Senate

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