

SECRETARY

DATE

RECEIVED
FEDERAL
OPERATIONS CENTER

04 SEP 23 AM 10:47

2004 SEP 21 A 7 51

DeMint Senate Victory Committee

September 20, 2004

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

Re: C00403717

Dear Ms. Trainer:

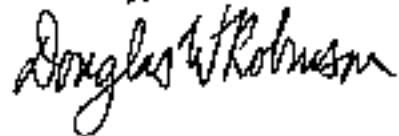
This letter is in response to your inquiry regarding the Statement of Organization filed by the DeMint Senate Victory Committee on August 2, 2004. You have questioned the use of a candidate name in the name of a political committee. You cite 2 U.S.C. § 432(e)(4) for the proposition that "any political 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 DeMint Senate Victory Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

The DeMint 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 DeMint Senate Victory Committee is an authorized committee of the DeMint for 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas W. Robinson". The script is cursive and fluid, with the first name "Douglas" being more prominent and the last name "Robinson" following in a similar style.

Douglas W. Robinson
Treasurer

24020732939
24020732939

National Republican Senatorial Committee
RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E.
WASHINGTON, D.C. 20002

OPERATIONS CENTER

2804 SEP 27 A 9:50

CERTIFIED MAIL



7004 0550 0000 7346 9897

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

Indefinite Hold Mail

EMILY J. REYNOLDS
SECRETARYPAMELA B. QAVAN
SUPERINTENDENTHART SENATE OFFICE BUILDING
SUITE 232
WASHINGTON, DC 20510-7118
PHONE: (202) 224-0322

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

☐ HAND DELIVERED _____
Date of Receipt☐ REGISTERED/CERTIFIED MAIL _____
Postmarked☒ RECEIVED FROM THE FEDERAL ELECTION
COMMISSION 9-28-04
Date of Receipt☐ DELIVERY CONFIRMATION/ON LINE TRACKING SYSTEM
☐ PRIORITY MAIL /WITH CONFIRMATION SHEET
☐ EXPRESS MAIL
☐ FEDERAL EXPRESS
☐ UPS
☐ DHL
☐ AIRBORNE EXPRESS _____
Postmark☐ PRIORITY MAIL (NO CONFIRMATION) _____
Date of Receipt☐ FIRST CLASS MAIL _____
Date of Receipt☐ FAX _____
Date of Receipt☐ NO POSTMARK ☐ POSTMARK ILLEGIBLE☐ OTHER _____
Date of ReceiptElw 9-28-04
Preparer Date Prepared

24020732941
24020732941

