

SECRETARY OF THE SENATE

02 NOV 14 PM 4:28 HD

November 14, 2002

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

Re: C00382770

Dear Ms. Benitz:

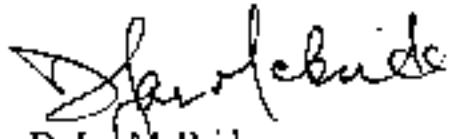
This letter is in response to your inquiry regarding the Statement of Organization filed by the Sununu Victory Committee on October 3, 2002. You have questioned the use of a candidate name in the name of a political committee. You cite 2 U.S.C. § 432(e)(4) for the proposition that "any political committee 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 Sununu Victory Committee is an authorized committee and is therefore permitted to include the name of a candidate in the committee name.

The Sununu 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 Sununu Victory Committee is an authorized committee of Team Sununu 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 "D. Jan McBride". The signature is written in a cursive style with a large, stylized initial "D".

D. Jan McBride
Assistant Treasurer

JERI THOMSON
SECRETARY

PAMELA B. GAVIN
SUPERINTENDENT
HART BUILDING
SUITE 307
WASHINGTON, DC 20510-7116
PHONE: 202-224-4322

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED 11-14-02
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

Gew 11-14-02
Preparer Date Prepared

22020870951
22020870951

