

Checklist for the Election Season

September 2008

- Ensure that employees are following safe harbor rules for volunteer activity in the workplace (or are following a more stringent internal policy).
- Ensure that partisan communications are limited to the restricted class, contain the necessary disclaimers and are reported on FEC Form 7 if necessary.
- Ensure that employees taking leave to volunteer for campaigns have followed all applicable Federal Election Commission rules.
- Final push for PAC fundraising.
- Reexamine and update internal policies for contributions from the federal PAC to state and local candidates, checking especially for pay-to-play and timing issues.
- Do the same for corporate contributions.
- Roll out pay-to-play prior authorization program in necessary states and local jurisdictions to prevent the company from losing government contracts and to prevent the company from being debarred from receiving new government contracts.

If you have any questions about any item on your pre-election "to do" list, please contact: Jan Witold Baran at 202.719.7330 or jbaran@wiley.law, Carol A. Laham at 202.719.7301 or claham@wileyrein.com, D. Mark Renaud at 202.719.7405 or mrenaud@wiley.law or Caleb P. Burns at 202.719.7451 or cburns@wiley.law.