

FEC Requires PACs to Provide Additional Detail on "Purpose of Disbursements"

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Political committees and other persons required to file reports with the FEC must itemize certain disbursements and, for each itemized disbursement, must include a brief description of the purpose of the disbursement. Importantly, the "purpose of disbursement" entry on the FEC report, when considered along with the identity of the disbursement recipient, must be sufficiently specific to make the purpose of the disbursement clear. On January 9, 2007, the FEC issued a Statement of Policy containing non-exhaustive lists of acceptable and unacceptable descriptions of disbursements that may be included by PACs on their FEC reports. This Statement of Policy—and the accompanying list of descriptions—is available from the Commission's website at: www.fec.gov/law/policy/purposeofdisbursement/notice_2006-23.pdf.

The following examples illustrate some of the descriptions that the FEC has approved in its recent Statement of Policy:

- "Door-to-Door Get-Out-the-Vote," "Get-Out-the-Vote Phone Calls," and "Driving Voters to the Polls" instead of the less descriptive "GOTV" or "GOTV Expenses."
- "Consultant-Media," "Consultant-Fundraising," "Consultant-Get-Out-the-Vote," "Consultant-Legal," or "Consultant-Polling" instead of the more general "Consultant-Political."
- "Catering Cost" instead of "Fundraising Expense" or "Event Expense."
- "Media" for a disbursement to a television or radio communication company rather than "Generic Campaign Activity."

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Please note that this new policy will not affect the vast majority of corporate or trade association PACs whose only disbursements are for candidate contributions which may continue to be disclosed as such.