Campaign Finance Memorandum - Summer 2007

Kennedy Covington's Campaign Finance, Political Committees and Ethics Practice Group advises clients on campaign finance, ethics, lobbying and conflicts of interest issues in connection with federal, state and local laws. We regularly counsel clients on the laws and rules pertaining to federal and state lobbying, political contributions, political action committees (PACs), ethics, the use of corporate facilities for political purposes and corporate guidelines on related issues.

As a service to our clients we will distribute regular updates to assist in monitoring political news and legislative changes in various states. This memorandum serves as a general overview of relevant news articles and should not be relied upon as legal advice for specific factual situations.

Alabama

- (06/08/07, Huntsville Times) For the sixth straight year, the Alabama Senate defeated a PAC-to-PAC transfer bill. The measure got caught in a last-day filibuster by the minority party and never came up for a vote. The Democratic and Republican caucuses endorsed the bill and the House, on a unanimous vote, passed the legislation in March. House Speaker Seth Hammett said he had been assured by Senate leaders at the beginning of the legislative session that the bill would be considered in the Upper Chamber this session.

California

- (05/26/07, San Francisco Chronicle) While candidates for statewide, congressional and presidential races have contribution limits, candidates running for local office in the state of California face no restrictions on how much money they can raise from individual donors. A review by the Associated Press found only 13 of California's 58 counties and 96 of its 478 cities put limits on the size of donations candidates could accept. In the late 1990s, the state briefly imposed strict caps on donations to local candidates. Proposition 208 allowed most donors to give no more than $250 per election to candidates for local offices and the Legislature and $500 per election to statewide candidates but a federal judge struck down the limits, ruling them too stringent to allow the typical candidate to communicate with voters.

- (06/08/07, Sacramento Bee) Fearing they would drive away potential investors, trustees of the California State Teachers' Retirement System (CalSTRS) revised proposed rules aimed at cracking down on pay-to-play practices. Trustees dropped provisions allowing the fund to impose financial penalties and immediately fire money managers. The board also raised the cap on annual campaign contributions from a single company. Last fall, the $171.5 billion fund crafted some of the toughest campaign finance limits in the nation. Currently, CalSTRS requires money managers to disclose any campaign contributions of more than $100 or meals of $50 or more. CalSTRS' changes emerged after feedback from investment managers, corporate governance advocates and other groups during a two-month public review. They included dropping financial penalties, which originally called for fines of $10,000 or more. Officials say state law prohibited CalSTRS from imposing fines. The system removed provisions allowing for immediate termination of a contract. Instead, violators would be banned from doing new business with CalSTRS for two years. The changes add an aggregate maximum contribution of $5,000 from top officials at a single investment firm. Individuals are limited to a $1,000 annual limit, and the changes require trustees to recuse themselves from investment decisions involving firms from whom they have received contributions.

Federal

- (06/28/07, Chicago Daily Herald; Associated Press) Fundraisers for presidential candidates are no longer solely focused on raising money from large contributors at fundraisers where entry can cost as much as $2,300. Instead, candidates such as U.S. Senator Barack Obama (D-Ill.) are hosting fundraisers that cost only $100 to attend, hoping to reel in supporters who might give more of their money, along with their time, in volunteering for a campaign. Former U.S. Senator John Edwards (D-NC) hosted a birthday fundraiser with an entrance fee of just $15, and U.S. Senator Hilary Clinton (D-NY) said she recently held a $20 per person event. Hosting cheap fundraisers allows campaigns to build local networks of people to help get their message out when a candidate is not in town, according to Campaign Finance Institute Executive Director Michael Malbin. A cheap ticket to an Obama fundraiser appealed to Robert Johnson, who said the ticket price was worth it compared to making a regrettable choice for president. "The wrong person could cost you an extra five to ten grand a year [in taxes]," said Johnson.

- (06/28/07, Washington Post) Roughly half of the money spent on federal contracts in 2006 was awarded with little or no competition, according to a report by the U.S. House Committee on Oversight and Government Reform. Committee Chairperson Henry Waxman (D-CA) said the government spent $412.1 billion on procurement last year. Of that, $206.9 billion was awarded through contracts that required no bidding process, had limited competition, or otherwise fell short of full and open competition. No-bid contracts alone amounted to $103 billion in 2006, a 43 percent increase from the previous year. The report also investigated 187 contracts, valued at $1.1 trillion that have "been plagued by waste, fraud, abuse or mismanagement." The report, titled "More Dollars, Less Sense: Worsening Contracting Trends Under the Bush Administration," noted the $412.1 billion spent on procurement last year was more than double the $203.1 billion spent in 2000. Much of the increase has been driven by wars in Iraq and Afghanistan and by homeland security. Among companies receiving no-bid contracts, Lockheed Martin ranked highest in 2006, with $31.5 billion from over 14,000 contracts. Halliburton, the oil-service giant once led by Vice President Dick Cheney, was identified as one of the fastest-growing major contractors during the Bush administration. In 2000, Halliburton ranked 28th, receiving $763 million; in 2006, it was ranked sixth, receiving more than $6 billion.

- (07/16/07, Associated Press) Former U.S. Representative Mark Foley, who resigned from Congress amid an Internet teen sex scandal in September, reported spending nearly a half-million dollars in legal fees from his campaign account, according to an FEC filing. Foley accumulated $277,367 in legal fees from February to April, adding to the $206,000 he already accrued from last November to January. Foley's filing indicated he still had about $1.4 million in campaign cash as of July 15. The FEC has ruled that expenditures for legal fees that arise from congressional duties are generally lawful, but Foley must return money to donors who request refunds. In a letter to the Commission, Foley wrote that his legal fees are spent "in respon[se] to an investigation that was initiated by then, Speaker of the House, Dennis Hastert." Hastert called for a House ethics investigation after allegations surfaced that Foley had written sexually explicit Internet communications to male pages who worked on Capitol Hill. Soon after, Foley checked himself into a rehabilitation facility for what his attorneys said was treatment for "alcoholism and other behavioral problems." Since completing a rehabilitation program, Foley's whereabouts have not been confirmed and he has rarely been seen in public.

- (07/17/07, Daily News) Rudy Giuliani was named partner at Bracewell & Giuliani, but that hasn't stopped some of the law firm's attorneys from backing his rivals for president. Nearly one-third of the firm's attorneys who made a personal contribution to a presidential candidate during the past three months picked a candidate other than Giuliani. Four gave to Bill Richardson, three to Barack Obama and one to Christopher Dodd. Twenty of the firm's roughly 400 attorneys contributed to Giuliani. Andrew Edison, a Houston-based partner who donated to Obama, said many partners are "very fervent believers" in Giuliani, but there is no in-house pressure to back the ex-mayor.

- (07/24/07, Associated Press) Democratic candidate John Edwards recently returned a few thousand dollars from registered lobbyists, reiterating his commitment to not accept campaign donations from special interest groups. "We take every precaution possible, but sometimes people slip through, and when we find lobbyist money we refund it immediately," said Edwards spokeswoman Colleen Murray. Edwards has avoided campaign donations from lobbyists and political action committees dating back to his first run for political office in 1998 for a U.S. Senate seat in North Carolina. One of Edwards' top competitors, U.S. Senator Barack Obama (D-Ill.), has also vowed repeatedly to refuse money from special interests during his run for the White House. "We've got to get the national interests up front as opposed to special interests," Obama said in a recent Democratic candidate debate.

- (07/25/07, Associated Press) U.S. Representatives Don Young is under a criminal investigation, the second member of Alaska's congressional delegation to be part of a federal corruption probe. Young is being investigated for his ties to VECO Corp., an Anchorage-based company whose former top two executives including former CEO Bill Allen have pleaded guilty to bribing Alaska state lawmakers. According to the Wall Street Journal, Allen held fundraisers for Young every August for ten years. Disclosure reports show Young received $157,000 from VECO employees and its political action committee between 1996 and 2006. The FBI is also looking closely at a 2000 construction project on the home of U.S. Senator Ted Stevens that more than doubled the size of Stevens' house in the ski resort of Girdwood, about 40 miles south of Anchorage. A contractor who did work on the house said he was directed to send bills to VECO.

- (07/31/07, CNN.com) The House voted to require lawmakers to disclose more details of their bids to fund pet projects and their fundraising help from lobbyists on Tuesday. The bill, drafted by Democrats, would require House and Senate members to disclose those lobbyists who raise $15,000 or more for them within a six-month period by "bundling" donations from many people. It would also bar lobbyists and their clients from giving gifts, including meals and tickets, to lawmakers. Senators seeking targeted spending projects or "earmarks" would have to publicize their plans 48 hours before the Senate votes on the proposals in publicly available databases, and declare their families would not directly benefit financially. The bill also requires former House members to wait a year and ex-Senators two years before lobbying Congress in person. With the bill on its way to the Senate, leaders there expect opposition from some conservative Republicans, but they predict final passage of the measure by week's end.

Federal Election Commission

- (06/21/07, States News Service) The Federal Election Commission has resolved nine campaign finance enforcement matters as follows:

  - Friends of John Conyers agreed to pay a $3,000 civil penalty in connection with an FEC audit that revealed the Committee failed to properly disclose receipts, deposit receipts in a timely manner, and properly disburse funds.

  - The Republican State Committee of Delaware agreed to pay a $1,500 civil penalty for failing to disclose all financial activity on its 2004 Post-General Report.

  - The International Association of Heat and Frost Insulators and Asbestos Workers PAC agreed to a $1,200 civil penalty for failing to disclose all financial activity on its 2005 Mid-Year Report.

  - The Indiana Democratic Congressional Victory Committee agreed to pay a $1,000 civil penalty for failing to properly disclose all financial activity on its 2005 September Monthly report.

  - Independent Action, Inc. failed to disclose all financial activity onto its 2005 Year End Report. The Commission did not issue a civil penalty due to mitigating circumstances pertaining to the respondents' financial hardship.

  - EMILY'S LIST acknowledged it did not forward a small percentage of earmarked contributions within ten days of receipt to designated candidate committees. The Committee agreed to prevent future similar mistakes and the Commission took no further action.

  - Citizens for Altmire acknowledged they did not include adequate disclaimers on billboard advertisements posted around the district until one week after they were initially erected. The Committee and its treasurer agreed to take steps to prevent similar mistakes in the future and the Commission took no further action.

  - The Commission dismissed allegations against the Braxton County Democratic Executive Committee and Callaghan for Congress. The complaint centered on radio ads placed by the Braxton Committee that advocated the election of Congressional candidate Mike Callaghan and allegedly violated disclaimer, coordination and contribution source provisions of the Federal Election Campaign Act.

- Wynn for Congress was referred by the FEC's Reports Analysis Division for failing to disclose all financial activity on its 2006 July Quarterly Report. The Commission sent a letter of admonishment and dismissed the matter.

- (06/01/07, States News Service) The FEC approved a Final Audit Report for the 2004 presidential campaign of Kerry/Edwards 2004. The Commission found the political committee exceeded the general election expenditure limit by $1.2 million and that the Kerry/Edwards 2004 Inc. General Election Legal and Accounting Compliance Fund received $10,550 in impermissible contributions. The audit found the campaigns must also pay $64,134 to the U.S. Treasury for checks that were not cashed by recipients. Senator Kerry announced he will appeal the finding. The Commission also completed action on the 2004 presidential campaign audit for Gephardt for President (GFP), concluding that GFP must repay $250,303 of federal matching funds that it received in excess of its entitlement. GFP must also pay the U.S. Treasury $60,556 in excessive contributions and $12,242 for checks that were not cashed by the recipients. The Commission also found that GFP exceeded the Iowa Spending Limit by $162,943.

- (06/08/07, FCW.com) With the presidential race for 2008 already in full swing, the FEC has posted an on-line mapping application that will make it easier for the public to track where presidential candidates are getting their money. The application will enable users to view donations by geographic area. The creation of the application comes as individual contributions assume an increasingly important role in presidential campaign fundraising. Under the Bipartisan Campaign Reform Act, the amount of money candidates can receive from an individual donor per election cycle jumped from $1,000 to $2,000, with corrections for inflation. In 2008, donors are limited to $2,300 for the primary and general elections. With expectations for record-breaking fundraising, the FEC has also already ordered new Web servers.

- (06/27/07, Roll Call) The decision by the U.S. Supreme Court to allow unions and business groups to place issue ads in the period leading up to Election Day may generate considerable work for the FEC, as the already resource-strapped agency deals with ambitious timelines for the looming presidential election and the intricacies of what may become a landmark court decision. According to FEC spokesperson Bob Biersack, the high court's decision leaves two options for the agency. The first is to develop guidance on the court's decision using a rule-making process, which could take months to complete. The second is for the FEC to police the placement of issue ads on a case-by-case basis, similar to the agency's current policing policy for 527s. However, evaluating issue ads on a case-by-case basis leaves the field open for some groups to push the boundaries of the Supreme Court's decision. Former FEC Chairperson Michael Toner said there is one paragraph in the high court's majority opinion that could become a template for any new regulation by the agency. In his decision, Chief Justice John Roberts said the ads by plaintiff, Wisconsin Right to Life, Inc., were "legal because no reasonable interpretation would conclude the ad was an appeal to vote for or against a candidate. 'First, their content is consistent with that of a genuine issue ad; the ads focus on a legislative issue, take a position on the issue, exhort the public to adopt that position, and urge the public to contact public officials with respect to the matter. Second, their content lacks indicia of express advocacy: the ads do not mention an election, candidacy, political party, or challenger; and they do not take a position on the candidates' character, qualification, or fitness for office.'"

- (07/15/07, St. Louis Post-Dispatch) For more than a year, a team of attorneys in the Justice Department's Civil Rights Division worked on a lawsuit arguing that Hazelwood School Board elections violated voting-rights laws. Attorneys found only two blacks had won election to the seven-member board during the preceding decade, in a district where 65 percent of 20,000 students and nearly 40 percent of the voting population were black. They argued that the practice could be diverted if the school district eliminated its at-large election process and had candidates run in sub-districts. However, three months later the plan was vetoed by counsel to their boss, Hans von Sparkovsky, in effect killing the lawsuit. The lawsuit is one of a number of cases brought to light in the course of von Sparkovsky's ongoing nomination to the Federal Election Commission. In a letter to the nominating committee, seven attorneys said von Sparkovsky "violated the sacred rule that partisanship should be checked at the door of the Justice Department. Moreover, he was the point person for undermining the Civil Rights Division's mandate to protect voting rights." As a nominee, von Sparkovsky is prohibited from providing interviews, in keeping with White House policy.

- (07/13/07, States News Service) The FEC recently completed action in the following enforcement matters:

  - The West Virginia Democratic Executive Committee agreed to pay a $21,750 penalty for failing to disclose financial activity on its 2004 12 Day Pre-General and 30 Day Post-General Election Reports.

  - The Commission sent a Letter of Admonishment to Porter for Congress for failing to include adequate disclaimers in a series of radio advertisements.

  - The Commission dismissed allegations that the Democratic Party of Hawaii failed to file timely reports with the Commission.

  - The Commission sent a Letter of Admonishment to Robert P. Corker, a 2006 Senate candidate, and dismissed allegations that he failed to file reports under federal law for self-financed candidates.

  - The Commission took no further action regarding allegations that unknown respondents violated federal law. The complaint centered on allegations that a mass mailing in October 2004, expressly advocating the election or defeat of a federal candidate, failed to comply with disclaimer requirements.

- (07/11/07, States News Service) The FEC filed suit in U.S. District Court against Stephen Adams, charging that he failed to report and include proper disclaimers on $1,000,000 in billboard advertisements during the 2004 Presidential race. According to the suit, Adams made a $1,000,000 independent expenditure to pay for approximately 435 billboard advertisements expressly advocating the re-election of President Bush in four states: Michigan, Pennsylvania, Wisconsin and South Carolina. The billboards ran from September 7 through November 2, 2004, the date of the general election. Adams failed to timely file a 48-hour notice for independent expenditures, filing it more than six weeks late. In addition, disclaimers on the ads were incomplete and did not contain the required sponsor information or state that the billboards were not authorized by any candidate or party.

- (07/16/07, PR Newswire US) Citizens for Responsibility and Ethics in Washington ("CREW") filed a complaint with the FEC against the Republican Party of Minnesota and its former treasurer, Marina Taubenberger, alleging multiple violations of the Federal Election Campaign Act ("FECA"). The complaint centers on a February 15, 2006 confidential memorandum from former Republican Party of Minnesota finance director Dwight Tostenson to the Party's Executive Committee. The memorandum alleged that Ms. Taubenberger violated FECA by failing to disclose over $100,000 in debts and failing to report unreimbursed staff advances in order to prevent the public from knowing the true financial state of the Party prior to the 2006 general election. Taubenberger resigned from her position within a month after the Party received the memorandum.

- (07/19/07, States News Service) The FEC announced that it will undertake a rulemaking to incorporate the Supreme Court decision in Wisconsin Right to Life v. FEC into the Commission's regulations. The Commission intends to make clear how it will interpret the exemption before mid-December, when the electioneering communication timeframes for the 2008 campaign will begin. The Commission will prepare a Notice of Proposed Rulemaking in August suggesting the scope of the proposed regulations and seeking comment on alternatives. Comments on the proposals would be due in September with a public hearing on the rulemaking in October. This would permit the Commission to vote on a final rule by the end of November.

Florida

- (07/03/07, Palm Beach Post) The Florida Home Builders Association threatened to withhold contributions to incumbent legislators if they did not sponsor legislation on impact fees in favor of the Association. The group, seeking caps on rising impact fees by local governments, posted the threat on its Web site. The group's PAC is also withholding contributions to political parties, leadership funds, and other political committees until a task force develops criteria for making such contributions. Senate President Ken Pruitt said he was appalled by the message and urged his members to not only refuse to endorse the legislation, but also to return any contributions they have already received from the home builders association or associated PACs.

Georgia

- (07/07/07, Chattanooga Times Free Press) Democrats have taken an early lead in presidential campaign fundraising in Georgia, even though the state has gone to the Republican candidate in every election since 1996. The eight Democratic candidates have raised nearly $1 million in Georgia, largely coming from the Atlanta area. Republicans have raised close to $650,000 among nine announced candidates. At this time in the last presidential election, President Bush had raised nearly $2.25 million in Georgia and Democrats raised a little less than $750,000.

- (07/16/07, Associated Press) Vice President Dick Cheney arrived in Georgia where he planned to help raise campaign funds for U.S. Senator Saxby Chambliss. Chambliss already has a commanding head start in fundraising for next year's race. The Republican reported $3.4 million in his war chest of the $6.3 million he has raised. Fundraising figures were not yet available for DeKalb County Chief Executive Officer Vernon Jones, who has formed an exploratory committee to enter the Senate race against Chambliss. Jones reported raising just $17,900 in his last report covering through the end of March.

- (07/10/07, Atlanta Journal-Constitution) An ethics complaint was filed against Governor Sonny Perdue, alleging he illegally transferred $787,000 in leftover campaign donations to a new PAC designed to push his agenda. The complaint argues Perdue may only donate the leftover money from his 2006 re-election campaign to charitable organizations, political parties or candidates. After paying debt from the campaign, supporters of Perdue created Perdue PAC. Such special-interest PACs are generally set up to fund candidates or issue campaigns, but Perdue staff members have been vague about how Perdue PAC will spend its money.

Louisiana

- (05/29/07, Baton Rouge Advocate) A majority of Louisiana's statewide elected officials are backing a proposed law that would require them to annually file personal financial disclosure statements. Currently, Louisiana governors and candidates for governor must file personal disclosure statements that include such things as sources of income, property owned, assets and liabilities. The reporting is done in financial ranges, with the lowest less than $5,000 and the highest $200,000 or more. The new bill is intended to extend the reporting requirements to all statewide officials.

New York

- (06/02/07, Daily News) Mayor Michael Bloomberg and the City Council have reached an agreement in support of a bill that would severely limit political contributions from people who do business with the City. Builders, contractors, lobbyists and others who work for the city-who can currently donate as much as $4,950 for certain city political races-would be limited to contributions of a maximum of $450 or so. Politicians would also not receive matching funds for these donations. The bill would also prohibit contributions from LLCs and LLPs.

- (05/26/07, Poughkeepsie Journal) A review of records from former New York Comptroller Alan Hevesi show investment advisers who earned at least $13 million in management contracts last year also donated about $70,000 to Hevesi's re-election campaign. In response to questions raised about potential conflicts-of-interest, Hevesi's successor, Thomas DiNapoli, has called for public financing of comptroller campaigns. DiNapoli has unveiled a series of campaign finance proposals that also include spending and donation limits, as well as a requirement that candidates participate in at least two debates. The state comptroller is the sole trustee of the $154 billion public-employee pension fund. Also under investigation are long-time Hevesi campaign manager Hank Morris and Elliott Broidy, an investor and fundraiser from California. Both men served on the boards of companies in which Hevesi invested state money. Hevesi resigned in December after admitting to using a state employee for several years as a chauffeur and errand-runner for his wife.

North Carolina

- (07/14/07, Raleigh News & Observer) In the wake of former Speaker of House Jim Black's federal sentencing, lawmakers say they will consider additional ethics reforms, and expect to pass some, before the end of session. Among the most significant is a piece of legislation that would require open ethics hearings involving lawmakers and state government workers to the public. "I think it's going to happen," said Representative Deborah Ross. "There's a good-faith effort to make things more transparent." Other ethics bills making their way through the legislature include a movement to make elected officials found guilty of corruption charges forfeit their government pensions and legislation that requires disclosing and limiting contributions to the legal defense funds of elected officials and candidates.

- (07/12/07, Associated Press) After three decades of public service, former Speaker Jim Black will end his political career in a federal prison. Black was sentenced to more than five years in prison for taking thousands of dollars in cash from chiropractors while promoting their agenda at the Capitol. The 72-year old apologized at his sentencing, calling his actions "stupid mistakes." Black was also fined $50,000 and must serve three years of probation once he completes his prison term. In February, the lawmaker pleaded guilty to a single count of accepting things of value in connection with the business of state government. Prosecutors also said Black took $500,000 from an unidentified lobbyist in 2000 and identified it as a personal loan to his campaign, a violation of state campaign finance disclosure laws.

- (07/31/07, News & Observer) Former Speaker Jim Black was fined $1 million and sentenced to 8-10 months of prison time for pleading guilty on state corruption charges. Black may serve his sentence concurrently with his federal prison term, but the jail time could increase if he fails to pay the fine. At the sentencing hearing, Black revealed that lobbyist Don Beason had loaned him $500,000 in 2000. Beason is a powerful lobbyist representing major corporations in the North Carolina General Assembly. Black asserted the loan was personal and repeatedly denied that it was a sham to hide an illegal political contribution. Beason was selected as the most influential lobbyist in polls of lobbyists, legislators and reporters who cover the General Assembly in both 2003 and 2005, the last year that the poll was conducted.

Ohio

- (06/09/07, The Columbus Dispatch) Ohio's new campaign finance reform law contains a restriction that hampers the government and violates the Constitution, according to Common Pleas Judge John F. Bender. Judge Bender struck down a retroactive restriction in House Bill 694 that has delayed financing a new county courthouse. At issue is a provision that effectively set tighter limits on donations by businesses or unions that wish to gain government contracts of $500 or more. Officeholders cannot award those contracts to individuals that gave them more than $1,000 or to groups, unions, partners and families that donated more than $2,000 total in political contributions. The restriction, as originally drafted, was to apply retroactively and prevented government officials from awarding contracts to businesses and unions that donated under previously legal limits. Senate Republicans, acknowledging the flaw, have already introduced language in a pending budget bill to fix the retroactive application.

Texas

- (05/28/07, Dallas Morning News) Leaders of the movement to oust Texas House Speaker Tom Craddick declared defeat as the 2007 legislative session ended, but said the race to be Speaker in 2009 has already begun. Nearly 60 lawmakers opposed to Craddick staged a dramatic walkout to protest the speaker's refusal to allow a vote on his fate. The walkout, which broke a quorum and forced the House to adjourn, followed a dramatic but nonbinding roll call vote by Representative Pat Haggerty, who asked to make a personal privilege speech and then began calling members' names and asking them to cast their votes on whether Craddick should stay. When he was cut off by Speaker Pro Tem Sylvester Turner, Haggerty urged all who would have voted against Craddick to "take your [voting][sp] key and walk out."

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