

To: CFB rule subcommittee

From George Beck, Chair Minnesota Citizens for Clean Elections

Without doing a survey, I found the following in my file concerning family involvement in independent spenders;

Democracy 21 Model Bill – (c) (2) (E) – The person is established, financed, directed or managed by a member of the immediate family of the candidate, or the person or any other officer or agent of the person has had more than incidental discussions about the candidate's campaign with a member of the immediate family of the candidate. For the purposes of this subparagraph, the term "immediate family" has the meaning given such term in section 9004(e) of the Internal Revenue Code of 1986.

IRC 9004(e) – the term "immediate family" means a candidate's spouse, and any child, parent, grandparent, brother, half-brother, sister, or half-sister of the candidate and the spouses of such persons.

2 Cal. Code Regs. § 18225.7(d) (7) – The person making the expenditure is established, run, staffed in a leadership role, or principally funded by an individual who is an immediate family member of the candidate.

In Paul Ryan's comments on the Cal. Regs he notes that "A family involvement with an outside spender sends the message to contributors that this is the candidate's preferred "independent" group and that its expenditures will be the most beneficial to the candidate."

Perhaps use spouse *or partner*. I think the Board could interpret this without too much trouble.

If a child or parent or brother or sister works with the IEC, that should be coordination. The question is whether the candidate is avoiding contribution limits by working with an IEC to fund his campaign over the limits. Involvement of a family member makes that link pretty clear.

Cc: Jeff Sigurdson, Jody Pope