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ELECTION LAW NEWS

Developments in All Aspects of Political Law | March 2016

FEC Approves Two-to-One Charitable Matching Program

By Caleb P. Burns and Stephen J. Kenny

The Federal Election Commission's (FEC) recent dismissal of a complaint filed against Wal-Mart Stores broke new ground in the area of corporate charitable matching of political action committee (PAC) contributions. At issue in MUR 6873 was whether Wal-Mart is allowed to solicit PAC contributions from eligible employees by offering to double an employee's contribution amount in charitable donations. For the first time, the FEC approved a charitable matching program that goes beyond one-to-one matching. Additionally, the Commission approved the program's exclusive arrangement with a charity that provides assistance to Wal-Mart employees who face unexpected financial difficulties.

In 2004, Wal-Mart adopted a charitable matching program for PAC contributions. Under this program, Wal-Mart doubles the amount of any contribution to the corporation's PAC in charitable donations. The exclusive recipient of charitable contributions is Associates in Critical Need Trust (ACNT), a charity established by Wal-Mart to provide financial assistance to Wal-Mart employees who experience severe financial hardship. The complaint alleged that this arrangement was an improper exchange of corporate treasury funds continued on page 6

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California Adopts New Disclosure Rules Affecting Lobbyist Employers

By Carol A. Laham and Eric Wang

The California Fair Political Practices Commission recently adopted a new regulation that will affect reporting requirements of lobbyist employers and $5,000 filers. These groups are required to disclose on their quarterly reports payments to lobbyists, payments to lobbying firms, activity expenses, and "other payments to influence legislative or administrative action." Previously, "other payments to influence" were reported as a lump sum. In response to criticism that millions of dollars in lobbying expenses were not being meaningfully disclosed, the FPPC adopted a regulation that requires itemization of these expenses.

Beginning July 1, lobbyist employers and $5,000 filers must itemize all payments to influence of $2,500 or more that were made during a reporting period. They must identify the payee, the amount paid, and the primary purpose of the payment. continued on page 6

Justice Scalia's Impact on Campaign Finance and How His Death Could Significantly Alter the Legal Landscape

By Jan Witold Baran and Andrew G. Woodson

The passing of Supreme Court Justice Antonin Scalia on February 13 is significant in many ways, including for its impact on our nation's campaign finance jurisprudence. Throughout his nearly 30 years on the bench, Justice Scalia's strong, passionate, and often humorous advocacy for First Amendment principles carried much sway and, particularly in his later years, represented the views of a majority of the Court's members. But with his death and the prospect of President Obama appointing a replacement who does not share Justice Scalia's beliefs, there is a likelihood that the recent 5-4 majority supporting greater First Amendment freedom in cases such as *Citizens United v. FEC*, 558 U.S. 310 (2010), will soon become a 5-4 majority far more willing to uphold greater regulation of political speech.

Justice Scalia's first opportunity to weigh in on a campaign finance case came just months after taking office, when he provided an important vote in *FEC v. Massachusetts Citizens for Life, Inc. (MCFL)*, 479 U.S. 238 (1986), exempting the small, non-profit organization from the federal prohibition on independent corporate spending. Several years later *Austin v. Michigan Chamber of Commerce*, 494 U.S. 652 (1990) upheld restrictions on corporate speech more generally. It was Scalia's Orwell-invoking dissent that resonated most within the legal community. In fact, Scalia's dissent provided the analytical framework for subsequently overruling *Austin* twenty years later in *Citizens United*, once the composition of the Supreme Court changed and more justices—including Samuel Alito—were appointed that were sympathetic to Scalia's views.

While Justice Scalia did not write that many majority campaign finance opinions for the Court *per se*, his vote was often decisive and his dissents and concurrences were almost as powerful and memorable. For example, in his dissent in the *McConnell v. FEC*, 540 U.S. 93 (2003), Scalia wrote how it "is a sad day for the freedom of speech" when the Court allows restrictions on political speech but had recently disapproved of regulations involving sexually explicit cable programming, tobacco advertising, and illegally intercepted communications. In his

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Recent FEC Opinion on University's Payment to Campaign Intern Is Reminder of Myriad Legal Issues Companies Face During Election Season

By Michael E. Toner and Eric Wang

The Federal Election Commission (FEC) recently issued an advisory opinion to Hillary Clinton's presidential campaign regarding payments made by third parties to a campaign intern. While not directly relevant to most companies, the opinion is a useful reminder of some of the legal issues that may affect corporations and entities during an election year. These issues may include, for example, hosting political fundraisers, employees' and corporations' use of corporate resources and work time to engage in campaign activity, and employees who run for office.

The issue at the center of the FEC opinion is a provision of the federal campaign statute which treats "the payment by any person of compensation for the personal services of another person which are rendered to a political committee" as a contribution to the committee. This provision may be implicated in many contexts and may result in an incorporated entity (whether for- or non-profit) unwittingly making a prohibited campaign contribution.

The particular question raised by the Clinton campaign was whether one of its unpaid interns, who was a student at DePauw University, could accept a $3,000 stipend for "basic travel and subsistence expenses" and academic credit from the university for her campaign work. According to representations made by the campaign, the stipend and academic credit were awarded on a non-partisan basis and in conformance with accepted accreditation standards, and were available to students interning with non-profit, government, and start-up entities.

While the facts presented in this matter were fairly straightforward, the legal analysis was anything

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Los Angeles City Ethics Commission Announces Fines Totaling $47,500 for Lobbying Disclosure Violations

By Carol A. Laham and Karen E. Trainer

In February, the Los Angeles City Ethics Commission announced two fines totaling $47,500 for violations of the Municipal Lobbying Ordinance. Both cases involved lobbyist employers that did not completely and accurately disclose lobbying activity. The Municipal Lobbying Ordinance requires entities that employ lobbyists to file quarterly reports disclosing information on lobbying expenses and activities.

Los Angeles Alliance for a New Economy (LAANE) was fined $30,000 for failing to report $175,000 in lobbying expenses as well as information on the issues lobbied. According to the stipulation and order, LAANE filed a total of 12 inaccurate quarterly lobbying reports that disclosed no expenses and no issues lobbied. In another case, the Hospital Association of Southern California (HASC) was fined $17,500 for failing to report $108,000 in lobbying expenses and for disclosing inaccurate information on the issues lobbied. HASC filed seven reports that initially listed no expenditures, one of which also listed inaccurate information on the issues lobbied.

Both entities cooperated with the Ethics Commission and filed amended reports to correctly disclose lobbying expenses and issues lobbied. Each fine was half of the maximum penalty that the Ethics Commission could have imposed based on the number of violations.

According to media reports, representatives of both entities have indicated that the reporting errors were caused by a misunderstanding of the rules. These cases illustrate the importance of understanding applicable rules prior to engaging in lobbying activity in a particular jurisdiction. ■

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New York State Expands Lobbying Law to Cover Consultants, Reiterates Regulation of Grassroots Lobbying

By D. Mark Renaud and Eric Wang

Through a recent advisory opinion, the New York State Joint Commission on Public Ethics (JCOPE) significantly broadened the state's lobbying laws to cover certain consultants, and also reiterated the state's regulation of so-called "grassroots lobbying." As a result of the opinion, many individuals and organizations that may not consider themselves to be engaged directly in lobbying may now have to register nonetheless as lobbyists or lobbying entities.

Like most other states, individuals and firms that are compensated by clients or employers for lobbying the state legislature and executive branch on legislative, executive, and administrative matters are required to register and report as lobbyists. Clients and employers of lobbyists also are required to file semiannual lobbying reports in New York, and organizations that employ in-house lobbyists also may register on behalf of their employee lobbyists (and, in fact, are encouraged to do so by JCOPE). New York is relatively unique in that its state lobbying laws also cover lobbying in most municipalities, and some municipalities such as New York City may have their own additional lobbyist registration and reporting requirements.

The recent JCOPE advisory opinion expands these lobbyist registration and reporting requirements to paid consultants who do not themselves engage directly in what is traditionally regarded as lobbying, but who merely make "preliminary communications to facilitate or enable the eventual substantive advocacy." In other words, according to the JCOPE opinion, "when [an] individual communicates with a public official (or [the official's] staff) on behalf of a client – for the purpose of enabling the client to explicitly advocate before the public official – the lobbying has begun."

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Former CEO Facing Prison Sentence after Company's Pay-to-Play Scandal Exposed

By D. Mark Renaud and Louisa Brooks

A former CEO is expected to face four years in New Jersey state prison after pleading guilty to corporate misconduct following the discovery of a scheme to evade the state's pay-to-play laws. According to a press release by the New Jersey Attorney General's office, Howard Birdsall must also pay the state $49,808—the amount of his own illegal political contributions. His sentencing date is April 22.

As we previously reported, seven executives of Birdsall's successful engineering firm Birdsall Services Group (BSG) were indicted by a grand jury in 2013 on charges of conspiracy and money laundering after authorities discovered the company was illegally reimbursing employees for political contributions. The scheme involved disguising more than $1 million in corporate political contributions as personal donations from its employees. The employees would make donations of less than $300 to avoid reporting requirements and would then be reimbursed by the company, either directly or in the form of a "bonus" payment.

Now, along with former Birdsall's expected prison sentence, the wreckage of this once-respected firm leaves the remainder of its indicted former executives awaiting sentencing or trial. The company itself paid more than $1 million in criminal penalties, as well as $2.6 million to settle a settle a civil forfeiture action, and was eventually sold after filing for bankruptcy.

Although the story of BSG's downfall includes twists worthy of a daytime drama—the scheme came to light through a tip from a BSG officer's ex-wife who secretly recorded her husband's admission that he was making illegal contributions—unfortunately the consequences in this case are quite real. And though this example may represent a willful violation of state pay-to-play laws, it serves as an important reminder that such laws are strict, vigorously enforced, and carry serious penalties. In the news release following Birdsall's guilty plea, the Director of the Division of Criminal Justice within the New Jersey AG's office vowed to "aggressively prosecute anyone who engages in criminal conduct to evade our laws in this area."

A robust corporate compliance program, including a preclearance policy for employee political contributions, can go a long way toward averting unintentional violation of state law. As the unhappy story of Birdsall Services Group bears out, avoiding such violations is paramount to continued success—or, in this case, even existence. ■

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FCC Issues Enforcement Advisory Reminding Political Campaigns about Calling and Texting Restrictions under the TCPA

By D. Mark Renaud and Kathleen E. Scott

On March 14, the Federal Communications Commission (FCC) issued an Enforcement Advisory (Advisory) to remind political campaigns of the "clear limits" on autodialed and prerecorded voice calls and texts under the Telephone Consumer Protection Act (TCPA), the federal statute that governs automated calling. With this Advisory, the FCC made clear that TCPA restrictions cover calls and texts made by political campaigns and other organizations involved in the 2016 election.

The Advisory summarizes TCPA restrictions as they apply to political calls. While manually-dialed political calls and texts are not subject to TCPA restrictions, calls and texts to wireless numbers made with an autodialer or that deliver a prerecorded artificial voice are prohibited unless the campaign has received prior express consent from the called party. The burden of proof is on the campaign to show that it has obtained consent, and the called party may revoke that consent either orally or in writing. Additionally, all prerecorded voice messages must contain

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The Wiley Rein *Pocket Part to the FCPA Resource Guide*

By Gregory M. Williams, Daniel B. Pickard, Ralph J. Caccia, and Richard W. Smith

On March 10, Wiley Rein's FCPA Group released a unique publication. In November 2012, the Department of Justice and Securities and Exchange Commission published the Resource Guide to the U.S. Foreign Corrupt Practices Act (the Guide), addressing a broad range of topics regarding the interpretation and enforcement of the FCPA. Given the paucity of judicial precedent under the FCPA, the government's pronouncements regarding the meaning of the anti-corruption law carry substantial weight. U.S. officials, however, have announced that they do not intend to update or supplement the Guide. Wiley Rein, therefore, has created a "Pocket Part" to address subsequent FCPA developments.

The 60-page Pocket Part will not summarize the factual details of every FCPA matter. Rather, it selectively addresses the key FCPA settled actions and other related developments that either underscore the central lessons of the Guide or illustrate developing trends in FCPA enforcement. The document is intended to sit on your shelf next to Guide as a resource for counsel and compliance professionals confronting challenging FCPA compliance and investigatory questions. ■

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Plan Ahead: New Jersey Pay-to-Play Filing Due March 30!

Business entities that received $50,000 or more in contracts with governments in New Jersey (at all levels of government) in 2015 must file an annual disclosure statement of political contributions with the New Jersey Election Law Enforcement Commission by March 30, 2016.

This "Business Entity Annual Statement" (Form BE) requires electronic reporting of cash contributions of any amount and non-cash contributions in excess of $300 to a long list of campaign, party, and political committees. Reportable contributions include those made by the business entity, the owners of more than 10% of the business entity; principals, partners, officers, directors, and trustees of the business entity (and their spouses); subsidiaries directly or indirectly controlled by the business entity; and a continuing political committee that is directly or indirectly controlled by the business entity.

Reports are due even if no reportable contributions have been made. For more information, see the New Jersey Election Law Enforcement Commission website at https://wwwnet1.state.nj.us/lpd/elec/ptp/Form.aspx.

FCC Issues Enforcement Advisory Reminding Political Campaigns about Calling and Texting Restrictions under the TCPA *continued from page 4*

specific identifications—like the name of the person or entity responsible for the call.

The FCC also made clear with this Advisory that it will "vigorously enforce" the TCPA. Each violation of the TCPA carries with it a possible $16,000 fine from the FCC.

As we have said before, the bottom line for campaigns, PACs, Super PACs, trade associations, 501(c)(4)s, and other political or grassroots callers/texters is: know the rules before you robocall or robotext (including using autodialers). This includes federal law as well as state rules. The combination of Wiley Rein's preeminent election law practice group with its legendary communications practice group will help you navigate this minefield. ■

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2016 State Lobbying and Gift Law Survey

The Election Law & Government Ethics Practice updated its annual Survey of State Lobbying and Gift Laws for each of the 50 states and the District of Columbia. This year's survey is available for the first time through an online portal that includes timely updates. It includes, among other things, the definition of lobbying, grassroots lobbying, procurement lobbying, lobbying registration and reporting, general gift rules, lobbyist gift rules, and lobbyist campaign finance restrictions.

To view a sample of the portal, which contains 2014 information for Illinois and North Dakota, go to http://fiftystates.wpengine.com/. The username is **wileydemo**, and the password is **demo123**.

The full 2016 Survey and online portal is available now for purchase. Individual states are also available for purchase. For more information on the 2016 Lobbying and Gift Law Survey or to order, please contact Carol A. Laham at 202.719.7301 or claham@wileyrein.com ■

FEC Approves 2-1 Charitable Matching Program *continued from page 1*

for voluntary contributions to Wal-Mart's PAC and the 2-1 matching ratio was a form of indirect compensation for PAC contributions. The complainants also asserted that, because participants in the PAC charitable matching program are eligible to receive grants from ACNT, Wal-Mart was providing a financial benefit to employees in return for PAC contributions.

By a vote of 4-2, the Commission dismissed the complaint. Previously, the Commission was divided on the permissibility of two-to-one matches of PAC contributions. But the Commission concluded that reducing a donor's burden with respect to making a charitable donation is not indirect compensation to the individual and is a permissible solicitation expense. The Commission also concluded that, because receiving a grant from ACNT is entirely unrelated to making a contribution to the PAC, an employee obtains no direct financial benefit from contributing to the PAC. In any event, the number of PAC contributors who ultimately received an ACNT grant was *de minimis*.

Charitable matching is a valuable part of any company's strategy to solicit PAC contributions from eligible employees. Wiley Rein has deep experience in this area and is able to help companies establish a PAC solicitation program in accordance with federal law. ■

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California Adopts New Disclosure Rules Affecting Lobbyist Employers *continued from page 1*

The FPPC has supplied nine "payment codes" from which a filer must choose when identifying the primary purpose of the payment. The payment codes include such categories as salary and compensation for non-lobbyist employees (who spend 10% or more of their compensated time in a month engaged in lobbying) and public affairs expenses for coalition building, grassroots campaigns, and public policy initiatives.

The first report to be submitted under the new regulation is the October 2016 quarterly report. ■

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2007 concurrence in *FEC v. Wisconsin Right to Life, Inc.*, 551 U.S. 449 (2007), Scalia memorably mocked the federal prohibition on corporate electioneering communications by comparing it to the plight of a Moroccan cartoonist who had criticized the king's actions: "in the United States (making due allowance for the fact that we have elected representatives instead of a king) it is a crime [to criticize government actions], at least if the speaker is a union or a corporation . . . ." And in a concurring statement from *Doe v. Reed*, 561 U.S. 186 (2010), often cited by the "reform" community, Scalia extolled the virtues of disclosure, noting that "[r]equiring people to stand up in public for their political acts fosters civic courage, without which democracy is doomed."

While Justice Scalia's death is unlikely to change the Court's views on disclosure, which currently enjoy support from seven of the eight remaining justices (Justice Clarence Thomas being the sole dissenter on this point), Justice Scalia's absence on other questions means that there is a 4-4 split on other important campaign finance questions. Some are already speculating that the Court could revisit and overrule its *Citizens United* decision in the next few years if President Obama is successful in appointing a liberal justice to the Court. While there are no doubt many substantive jurisprudential areas where Justice Scalia's loss will be felt, because of the close votes in many of the campaign finance cases in recent decades, this is certainly an area to watch where a new Justice may have a major impact. ■

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but. The FEC commissioners deliberated for more than two months and considered five draft opinions before arriving at a consensus that the academic credit was not compensation, and the stipend was not "compensation *for* the provision of… personal services" to the campaign, but rather was "provided to students for bona fide educational objectives" (emphasis in the original). "[U]nder the circumstances presented here," the Commission concluded, "DePauw University's stipend [to the intern] is not compensation for personal services provided by [the intern to the campaign] and is not a contribution."

Even then, Democratic Commissioner Ellen Weintraub traded point-counterpoint written statements with her Republican colleagues over how far the reasoning of the opinion went. Weintraub insisted that the opinion be read narrowly, and as providing "no cover to super PACs, [501(c)(4) entities], or billionaires with political agendas seeking to subsidize the staff of their favorite candidates." The Republican commissioners underscored the "purpose-laden" approach the advisory opinion took in determining whether a third-party payment is considered to be a campaign "contribution," and suggested that this advisory opinion contradicted and superseded certain prior advisory opinions that imposed greater restrictions on the use of educational stipends by campaign interns.

While the Clinton advisory opinion, given its narrow scope, is not directly relevant to most corporations, it does underscore the importance of ensuring that no corporate resources are being used to compensate employees or executives who are volunteering on campaigns or who are themselves running for office. As a general matter, if employees and executives are using compensated work time instead of personal time for their campaign activities on behalf of any candidate, political party, or PAC (other than the corporation's own PAC), a corporation may be making a prohibited in-kind campaign contribution. The use of corporate facilities, such as office space and equipment, in connection with such activities also may result in prohibited contributions.

The use of corporate resources in connection with independent political activity also remains murky in many respects even six years after the Supreme Court of the United States' *Citizens United v. FEC* decision freed corporations to make independent expenditures. For example, immediately after the *Citizens United* decision, a union ordered its employees to engage in political activity during paid work time to support a congressional candidate independently of the candidate's campaign. The FEC commissioners split 3-3 on whether this activity violated a prohibition on coercing employees into making campaign contributions. Even if ordering its employees to engage in the campaign activity was permissible, the commissioners still concluded unanimously that the union was required to disclose the value of the union's resources used for the activity on an independent expenditure report, and which the union failed to do.

During an election season such as the one upon us now, it is often easy to overlook the mundane and technical minutiae of compliance with the election laws, especially when so much attention is focused on the campaign rhetoric, polls, fundraising numbers, and super PAC ads. As the FEC's advisory opinion to the Clinton campaign illustrates, there are many ways for corporations and non-profit entities engaged in seemingly routine transactions to get tangled in legal red tape when their activities bear on an election. ■

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Additionally, if a consultant merely and passively attends a meeting or monitors a phone call with a public official, during which someone else lobbies the official, the consultant is also regarded as having engaged in lobbying. The initial JCOPE opinion characterized these activities as "reportable lobbying." This begged the question as to whether these activities merely have to be reported by individuals and entities that are otherwise required to register as lobbyists, or whether these activities also count toward the registration thresholds. JCOPE subsequently issued three additional "FAQ" memos clarifying the initial opinion. Although still not explicitly clear, the subsequent FAQ memos appear to suggest that these "reportable lobbying" activities also trigger the registration requirements if the thresholds are met.

The JCOPE opinion also confirms guidance that had been issued previously by JCOPE's predecessor agency, the New York Temporary State Commission on Lobbying, which had concluded that so-called "grassroots lobbying" is regulated in New York. According to the latest opinion, "a grassroots communication constitutes lobbying if it: (1) References, suggests, or otherwise implicates an activity covered by [the lobbying law]; (2) Takes a clear position on the issue in question; and (3) Is an attempt to influence a public official through a call to action, *i.e.*, solicits or exhorts the public, or a segment of the public, to contact (a) public official(s)." A communication need not identify a particular bill number, executive order, or regulation to be considered grassroots lobbying.

Like its treatment of consultants with respect to direct lobbying, the latest opinion's treatment of grassroots lobbying is expansive in scope. Specifically, the opinion states that "participation in the actual delivery of the [grassroots] lobbying message to the audience, whether verbally or in writing," constitutes lobbying. According to the opinion, a "consultant who contacts a media outlet in an attempt to get it to advance the client's message in an editorial" and "paid media consultants who are hired to proactively advance their client's interests through the media" are engaged in lobbying. In addition, anyone who "participat[es] in forming" a grassroots lobbying message is also engaged in lobbying.

The opinion enumerates several exceptions, such as for billboard or sign owners, copy editors, advertisement writers, storyboard artists, film crews, media outlets and broadcasters, media buyers and placement agents, etc. Still, there may be many functions that fall into a grey area. For example, are vendors engaged in lobbying if they make robocalls or live telephone calls delivering a grassroots lobbying message on behalf of a client to members of the public? Under the literal language of the JCOPE opinion, they would appear to be "participat[ing] in the actual delivery" of a grassroots lobbying message, and thus may be required to register and report as lobbying firms.

Five public relations firms have filed suit against JCOPE in federal court, challenging the constitutionality of the agency's opinion as well as the process by which it was adopted. Pending resolution of the litigation and absent a court injunction, the JCOPE opinion should be treated as authoritative. As we have reported on previously, failing to properly register and report as lobbyists and lobbying entities in New York State may result in penalties of tens of thousands of dollars. (See *Coming Soon: Amnesty for New York State Lobbyist Registration and Reporting Violations*, *Election Law News*, Nov. 2015.) ■

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The Lawyer Is In: Legal Advice and Guidance for Your PAC
Michael E. Toner, Speaker
2016 National PAC Conference
March 8, 2016 | Miami, FL

Association PAC Legal Rules: Keeping Your PAC Compliant
Michael E. Toner, Speaker
2016 National PAC Conference
March 8, 2016 | Miami, FL

Election Law Compliance in This Critical Year: Avoiding the Pitfalls
Jan Witold Baran, Panelist
Corporate Counsel Institute: An Insider's Guide to Washington
March 11, 2016 | Washington, DC

Lawline's Campaign Finance, Election, & Political Law Program
Caleb P. Burns, **Robert L. Walker**, Speaker
Lawline's Campaign Finance, Election, & Political Law Program - Live Webcast
April 7, 2016 | Webinar

Emerging Trends in Campaign Finance Law and their Impact on the 2016 Presidential Race
Michael E. Toner, Speaker
Cornell Law School Alumni Event
April 21, 2016 | Washington, DC

Seventeenth Annual Private Equity Forum
Carol A. Laham, Speaker
June 29-30, 2016 | New York, NY