

FEC Issues New Bundling Disclosure Rules

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February 19, 2009

On February 17, 2009, the Federal Election Commission issued its new final rule establishing the reporting regime for bundled contributions raised or forwarded by federal Lobbying Disclosure Act registered lobbyists and LDA registrants (whether a lobbying firm or an entity employing in-house lobbyists), as well as by political committees established or controlled by registered lobbyists and LDA registrants.

In short, the new rule requires that the recipient "reporting committees" (federal candidate, political party, and leadership committees) file bundling disclosure reports with the FEC if they receive two or more bundled contributions exceeding the "reporting threshold," from a "lobbyist/registrant" or "lobbyist/registrant political action committee" during a specified period. The new rule is required by section 204 of the Honest Leadership and Open Government Act of 2007.

The Kelley Drye Campaign Finance & Political Law practice has prepared this Client Advisory, which gives an overview of the rule's requirements and new terms introduced into the federal campaign finance regulatory lexicon.