

<b>Rulemaking Matter Name (REG #)</b> [Status]	<b>Petitioner(s)</b>	<b>Petition Received</b>	<b>NOA</b>	<b>Comment Period Closed</b>	<b>NOD</b>	<b>Vote to Initiate a Rulemaking/ Documents Circulated to Commission</b>
<b>4. Contributions from Corporations/Other Orgs. to Political Committees (REG 2015-03)</b>	Make Your Laws PAC, Inc. Make Your Laws Advocacy, Inc.	05/14/15	Approved (07/16/15)  Published (07/29/15)	10/27/15	--	--
<b>5. Procedures for Public Comment on Draft AOs (REG 2016-01)</b>	Make Your Laws PAC Dan Backer	02/10/16	Approved (11/16/18)  Published (12/03/18)	03/04/19 (extended from 02/01/19)	--	--
<b>6. Political Party Rules (REG 2016-03)</b>	Minnesota Democratic- Farmer- Labor Party	06/15/16	Approved (09/15/16)  Published (10/07/16)	01/30/17	--	
<b>7. Former Candidates' Personal Use (REG 2018-01)</b>	Campaign Legal Center	02/08/18	Approved (03/14/18)  Published (03/21/18)	05/21/18	--	--

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<b>8. Leadership PACs’ Personal Use (REG 2018-02)</b>	Campaign Legal Center Issue One  Former U.S. Representatives: Rod Chandler Larry LaRocco Peter Smith Claudine Schneider John Tanner	07/24/18	Approved (09/06/18)  Published (09/17/18)	11/16/18	--	--
<b>9. Definition of “Contribution” (REG 2018-03)</b>	Institute for Free Speech	08/27/18	Approved (11/19/18)  Published (12/03/18)	03/04/19 (extended from 02/01/19)	--	--
<b>10. Size of Letters in Television Disclaimers (REG 2018-05)</b>	Extreme Reach	12/4/18	Approved (02/07/19)  Published (02/12/19)	04/15/19	--	--
<b>11. Adding “Valuable Information” to Definition of Contribution (REG 2019-01)</b>	Sai Fiat Fiendum, Inc. Make Your Laws PAC, Inc. Make Your Laws Advocacy, Inc.	04/29/19	Approved (07/25/19)  Published (07/31/19)	09/30/19	--	--

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<b>12. Filing Dates for Unauthorized Committees (Amend 11 CFR 104.5(c)) (REG 2019-02)</b>	Campaign Legal Center	06/14/19	Approved (08/22/19)  Published (08/28/19)	10/28/19	--	--
<b>13. Mailing List Exchange REG 2019-03</b>	Campaign Legal Center	06/28/19	Approved (08/22/19)  Published (08/28/19)	10/28/19	--	Comment received (06/05/23)
<b>14. Reporting Segregated Party Accounts (REG 2019-04)</b>	Campaign Legal Center Center for Responsive Politics	08/05/19	Approved (08/22/19)  Published (08/28/19)	10/28/19	--	--

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<b>15. Transfers from Candidate's Authorized Committee (REG 2020-02)</b>	Citizens United Citizens United Foundation	04/08/20	Approved (06/05/20) Published (06/30/20)	08/31/20	--	--
<b>16. Candidate Salaries (REG 2021-01)</b>	Nabilah Islam	03/23/21	Approved (04/22/21) Published (05/03/2021)	07/02/21	--	NPRM approved 12/21/22 Comment deadline 2/10/23 Hearing 03/22/23
<b>17. Subvendor Reporting (REG 2021-02)</b>	CLC & Center on Science & Technology Policy at Duke University	06/29/21	Approved (07/29/21) Published (08/05/2021)	10/04/21	--	

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<b>18. Petition for Rulemaking to Revise 11 C.F.R. § 110.6 (REG 2022-05)</b>	WinRed, Inc.	08/22/22	Approved (10/20/22) Published (10/28/22)	Comment deadline ends 12/27/22	--	--
<b>19. Petition for Rulemaking to Revise and Amend Regulations Regarding the Refunding of Illegal Contributions (REG 2022-06)</b>	Campaign Legal Center	08/25/22	Approved (12/15/22) Published (12/22/22)	Comment deadline ends 02/21/23	--	--
<b>20. Petition for Rulemaking to Clarify the Law Against 5 USC 30124 Applies to Deceptive AI Campaign Ads (REG 2023-01)</b>	Public Citizen	05/16/23				Disapproved (06/22/23)

# COMPLIANCE ADVICE

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The Policy Division’s Compliance Advice Team performs four primary functions: (1) providing legal advice to the Reports Analysis Division, the Audit Division, the Alternative Dispute Resolution Office, and the Office of Administrative Review in response to formal (Directive 69) requests and informal queries; (2) providing legal analysis at various stages of Title 52 and Title 26 audits; (3) drafting for Commission consideration responses to outside requests for legal consideration of corrective actions directed by RAD or Audit; and (4) administering legal aspects of the public financing system for presidential primary and general elections.

## Compliance Advice Projects in Quarter 3

Most of the Compliance Advice Team project categories included in the following Table have designated deadlines according to Commission Directive 69 and the operative Audit Program. Title 26 Audit report analyses must be completed within 60 days

Title 52 Audit report analyses other than Audit Division Review

Memoranda (“ADRM’s”) have 45 days while Title 52 Audit ADRM analyses . RAD and Audit Queries are each given 30 days under Directive 69 and External Requests for Legal Consideration have 15 business days or 21 calendar days per policy statement. The following Table also includes some of the advice that the Compliance Advice Team provided outside of these defined categories during the fourth quarter in the “Other” category.

Of note in this quarter, the Compliance Advice Team, along with several attorneys from the Policy Division’s other teams, provided legal advice and assistance to the Commission (rather than to an Office of Compliance component) in finalizing the Audit Process revision project. We included this project in the “Program and Procedure” category of this report and note that work involved in this project in this quarter included the finalization and submission of two Federal Register notices and revision of two Commission Directives.

In this quarter, the Compliance Advice Team also made significant contributions to projects not included in the table that follows. These included drafting responses to questions from the Ranking Member of the Committee on House Administration and providing Policy counsel on a proposed Directive on Congressional Referrals, proposed Directive on Investigative Plans, and Federal Register Notice on Agency Procedure Regarding Litigation Brought Pursuant to 52 U.S.C. § 30109(a)(8).

Please see Table 1, below, for the status of Compliance Advice Team assignments this quarter.

**Table 1 — Compliance Advice Data for Q3**

	Title 26 Comments	Title 26 SORs	Title 52 Audit Comments	Title 52 Audit Comments (ADRM)	RAD Queries	Audit Queries	Program & Procedures	Directive 69 Memos	External Requests for Legal Consideration	Other	Totals
# of Matters Pending at Beginning of Quarter	0	0	2 <sup>1</sup>	0	0	0	1 <sup>2</sup>	1 <sup>3</sup>	0	0	4
# of Matters Opened During Quarter	0	0	2 <sup>4</sup>	1 <sup>5</sup>	2 <sup>6</sup>	0	2 <sup>7</sup>	0	1 <sup>8</sup>	6 <sup>9</sup>	14
# of Matters Pending at End of Quarter	0	0	2 <sup>10</sup>	0	2	0	0	1	0	1 <sup>11</sup>	6
# of Matters Completed During Quarter	0	0	2	1	0	0	3	0	1	5	12

<sup>1</sup> Citizens for Waters (DFAR);  
<sup>2</sup> Audit process revisions.

<sup>5</sup> Steve Daines for Montana.

<sup>7</sup> Annual Review of Request for Legal Consideration Program; 2021-2022 Unauthorized Audit Program.

<sup>9</sup> 2024 Matching Funds Federal Register Notice; ;  
 Latinos for America First (public file review);

<sup>10</sup>  
<sup>11</sup>

	Title 26 Comments	Title 26 SORs	Title 52 Audit Comments (non- ADRM)	Title 52 Audit Comments (ADRM)	RAD Queries	Audit Queries	Programs & Procedures	Directive 69 Memos	External Requests for Legal Consideration	Other	Totals (Weighted Average)
Average # of Days for Matters Completed During Quarter	N/A	N/A	46	7	N/A	N/A	55	N/A	30	9	28
Average # of Days for Matters Pending at End of Quarter	N/A	N/A	16	N/A	5	N/A	N/A	115 <sup>12</sup>	N/A	65 <sup>13</sup>	19

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<sup>12</sup>

<sup>13</sup>



# CONSULTATION AND REVIEW

In addition to advisory opinions, rulemakings, and compliance advice matters, the Policy Division routinely and actively engaged in work on many other types of matters during the third quarter. *See* Table below.

## Table — Consultations and Review for Q3

