

<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	--	--
<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	--	--

# 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 comments on 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 2

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

Title 52 Audit Comments other than Audit Division Review Memoranda (“ADRMs”) have 45 days while Title 52 Audit Comments on ADRMs 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 the ongoing Audit process revision project. We included this project in the “Program and Procedure” category of this report, along with a brief note highlighting some of the work involved in this project, including the drafting of several Federal Register notices.

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

**Table 1 — Compliance Advice Data for Q2**

	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	0	0	0	0	2 <sup>1</sup>	0	1 <sup>2</sup>	0	3
# of Matters Opened During Quarter	0	0	6 <sup>3</sup>	1 <sup>4</sup>	1 <sup>5</sup>	0	0	1 <sup>6</sup>	0	7 <sup>7</sup>	16
# of Matters Pending at End of Quarter	0	0	2 <sup>8</sup>	0	0	0	1 <sup>9</sup>	1	0	0	4
# of Matters Completed During Quarter	0	0	4	1	1	0	1	0	1	7	15

<sup>1</sup> Draft 2021-2022 Audit Program; Audit process revisions. The FY23 Q1 Report inadvertently omitted the audit process revisions,

<sup>2</sup>

<sup>3</sup> Communications Workers for America – COPE (DFAR); Citizens for Waters (DFAR); Latinos for America First (DFAR);  
; Steve Daines for Montana (DFAR).

<sup>4</sup> Latinos for America First.

<sup>5</sup> Hastings for Congress.

<sup>6</sup>

<sup>7</sup> 2024 Matching Funds Federal Register Notice;

for US Senate (public file review);

; Jim Risch  
Sheila Jackson Lee for Congress (public file review).

<sup>8</sup> Citizens for Waters;

<sup>9</sup> Audit process revisions (while Policy completed two Federal Register notices (for comments and hearing) in Q2, the project continued for the entirety of Q2).

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	<b>Title 26 Comments</b>	<b>Title 26 SORs</b>	<b>Title 52 Audit Comments (non- ADRM)</b>	<b>Title 52 Audit Comments (ADRM)</b>	<b>RAD Queries</b>	<b>Audit Queries</b>	<b>Programs &amp; Procedures</b>	<b>Directive 69 Memos</b>	<b>External Requests for Legal Consideration</b>	<b>Other</b>	<b>Totals (Weighted Average)</b>
<b>Average # of Days for Matters Completed During Quarter</b>	N/A	N/A	27	0	3	N/A	25	N/A	30	13	21
<b>Average # of Days for Matters Pending at End of Quarter</b>	N/A	N/A	2	N/A	N/A	N/A	100	23	N/A	N/A	11

# 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 second quarter. *See* Table below.

## Table — Consultations and Review for Q2