

BY FAX

DATE: March 31, 2004

TO: Ms. Mai T. Dinh
Acting Assistant General Counsel
FAX # 202-219-3923

FROM: James O. Knop
5710 Hammersley Rd
Madison WI 53711
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Attached by FAX: Comments on Proposed Rules Regarding Political
Committee Status

FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE ATTORNEY GENERAL
WASHINGTON, D.C. 20535
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Ms. Mai T. Dinh
Acting Assistant General Counsel
Federal Election Commission

SUBJECT: Comments on Proposed Rules, Political Committee Status

Dear Ms. Dinh:

I am opposed to the Federal Election Commission's proposed rule change for non-profit group advocacy. Congress and the courts have specifically considered and rejected such regulation. The FEC's proposed rules on this topic are supported neither by Congress's campaign reform law nor by the U.S. Supreme Court's decision upholding that law. The chilling effect of the proposed rules on free speech cannot be overstated.

Any kind of non-profit -- conservative, liberal, labor, religious, secular, social service, charitable, educational, civic participation, issue-oriented, large or small, could be affected by the FEC's proposed rules. A vast number of these organizations would be essentially silenced on the issues that define them, whether they are organized as 501(c)(3), 501(c)(4) or 527 organizations.

In the McConnell opinion upholding McCain-Feingold, the U.S. Supreme Court clearly stated that the law's limits on unregulated corporate, union and large individual contributions apply to political parties and not interest groups. Congress specifically considered regulating 527 organizations three times in the last several years, and chose not to subject them to McCain-Feingold. Nothing in the McCain-Feingold campaign reform law nor in the U.S. Supreme Court's decision upholding that law provides any basis for the rules on Political Committee Status proposed by the FEC. The FEC has no legal right to treat non-profit interest groups as political committees.

The FEC's proposed rules also contradict the Internal Revenue Service's political and lobbying rules for non-profit organizations, and absurd situation. I urge the FEC to reject these rules now.

Sincerely,



James O. Knop
5710 Hammersley Rd
Madison Wisconsin 53711

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL