



FEDERAL ELECTION COMMISSION

Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission

**FROM:** Office of the Commission Secretary *LC*

**DATE:** March 25, 2024

**SUBJECT:** AOR 2024-03 (politicalmeetings.com) Supplemental Material  
requested from Commissioners

**Attached is AOR 2024-03 (politicalmeetings.com) Supplemental Material requested from Commissioners. This will be discussed at the Open Meeting of March 27, 2024.**

**Attachment**

**RECEIVED**

By Office of the Commission Secretary at 2:32 pm, Mar 25, 2024

**From:** [Sue Rose](#)  
**To:** [Cheryl Hemsley](#)  
**Cc:** [Neven Stipanovic](#); [Robert Knop](#)  
**Subject:** RE: AOR 2024-03 (PoliticalMeetings.com) further information requested by Commissioners  
**Date:** Monday, March 25, 2024 12:38:01 PM

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Hi Cheryl, please see below.

Sue

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**From:** [Cheryl Hemsley](#)  
**Sent:** Friday, March 22, 2024 4:42 PM  
**To:** [Sue Rose](#)  
**Cc:** [Neven Stipanovic](#); [Robert Knop](#)  
**Subject:** AOR 2024-03 (PoliticalMeetings.com) further information requested by Commissioners

Sue,

We have been asked by one or more Commissioners to ask you these questions regarding your advisory opinion request on behalf of PoliticalMeetings.com.

1. On page 7 of the request, it states that “if PM receives an enquiry from a Visitor or Subscriber who wants to donate to a candidate, PM will contact the Candidate Campaign Committee. If the Candidate Campaign Committee agrees to participate, PM will email instructions on how to complete the Permission Slip allowing PM to proceed with the process as described.”  
What if the Candidate Campaign Committee agrees to provide the necessary information to process the transaction (e.g. bank account information for direct deposit), but does not want to otherwise “opt in” to the terms of the Permission Slip?

In that case, their answer would be a “no” and we would then notify the Visitor or Subscriber that the Candidate is not cooperating with PM and that we cannot facilitate their request.

How will PM.com decide which committees to contact for the purpose of asking them to opt-in to program? Our plan is to involve as many committees, candidates and those identified as eligible sponsors as possible in several ways. One plan is to reach out to the public by having tables at major shopping centers and malls to sign up subscribers and talk to those interested in Subscribing which is where PM can learn who each person wants to support, and that is one way, PM can be charged with the task of contacting the campaign unless the campaign has already provided permission. The calls from potential Subscribers and Subscribers to candidates will be based on their requests. We will also make an effort to call on all campaigns equally aside from individual requests since the success for our Subscribers is that we provide the most robust and fully developed source of information possible on politics, the issues at hand on all candidates running for office.

2. On page 4 of the request it states that donors will have “Private Agenda access,” described as “access that Donors are provided by the Platform to meetings or events that are not ordinarily open to the public and are by invitation specifically for donors” of an eligible Meeting Sponsor. On page 3, it states that the Enhanced Candidate Profile will include “a link to

content such as fundraisers and special events.” Will either the Enhanced Candidate Profile or the Private Agenda Access include links to a committee’s solicitations for fundraisers or links that will allow the Subscriber to directly RSVP to the event and make any required contribution to attend?

Or will it just provide , for example, the date and name of the event, such that a subscriber would need to contact the committee directly to receive an invitation or to register for the event?

There can be direct links to contribute to a campaign or to RSVP. There will be links to fundraising events or other special events like a private meet & greet or other meetings such as meetings focused on building a team of volunteers for the campaign, etc. The website page by the campaign or candidate that is advertising or asking for registration to an event may have a link to donate.

3. On page 3 of the request it states that the Enhanced Candidate Profile will include “a link to donate.” Will this be a link to a donation page on PM’s website, or will this link to the committee’s website or the committee’s ActBlue/WinRed page? **If the campaign provides us the link to ActBlue or WinRed, we will add that link.** Will this be the only way for a subscriber to make a contribution? In other words, would making a contribution through the link on the Enhanced Candidate Profile be different from the contributions that a Subscriber makes as part of their subscription fee? **Yes, we will only facilitate the \$1 donation per subscriber per month for as long as the Candidate is legally able to solicit donations. PM will not have any other method to facilitate a donation.**
4. On page 8 of the request it states that once a Prospective Candidate completes the Permission Slip, they will receive additional information including “a commitment to cooperate and other general terms and conditions.” What is this commitment to cooperate? Is this something else that candidates must agree to? **It is not separate agreement. The commitment to cooperate means that the candidate or candidate’s legal representative must provide information on meetings or events that are not open to the general public so that the Subscriber is benefitting from access to their Enhanced Profile.**

Your response to this email may be considered a supplement to the advisory opinion request and posted on the Commission’s website.

Best regards,  
Cheryl Hemsley  
Attorney  
OGC/Policy  
Federal Election Commission