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| **From:** | Michael Calderin |
| **To:** | mdove@fec.gov |
| **Subject:** | Comment on ActBlue Opinion |
| **Date:** | 12/13/2007 11:57 AM |

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To the Commission:

As a prior Congressional candidate, I offer my ideas and experiences, hoping they assist you in drafting an advisory opinion regarding ActBlue and matching contributions.

I understand the letter of the law, 11 CFR 9034.3(f), declares contributions "drawn on the account of a committee" such as ActBlue are not matchable "even though the funds represent personal funds earmarked by a contributing individual...."

However, it is important to note that ActBlue does not raise funds to distribute to candidates. ActBlue acts only as a conduit. In non-political-speak, ActBlue functions as a credit card processor which consolidates incoming payments and regularly forwards checks to campaigns.

To the contributor, a contribution made to a candidate through ActBlue is no different than any other contribution. Candidates report contributions through ActBlue as coming from the originating individual via the ActBlue conduit.

Contributions through ActBlue also count toward an individual's maximum allowed contribution. Herein, we find the spirit of the law as I understand it. The purpose of itemizing contributions, assigning ownership, and limiting contributions is to reduce corruption and manipulation of our election process by those few with large amounts of money at their disposal.

Individuals expect that any contributions credited to them will be matchable up to the limit, whether a check sent through the mail, a contribution made online via a private card processor, or an online contribution via the ActBlue conduit. Most people don't understand that distinction; and as a technology consultant and potential lawmaker, if people don't understand a distinction, most of the time there should not be one.

I urge you to allow contributions via ActBlue to count toward matching funds. It is the most transparent and just ruling you could offer in this decision.

Thank you,

Michael Calderin