

# Election and Political Law

## E-ALERT

February 17, 2009

### FEC Finalizes Bundling Disclosure Rules - UPDATE

The Federal Election Commission's bundling disclosure rules were published in the *Federal Register* today. As a result, we can now calculate the dates on which various reports identified in the statute and regulations are due.

- By March 29, 2009, PACs that are "controlled" by a lobbyist or company registered under the Lobbying Disclosure Act ("controlled committees") must amend their FEC Form 1. The FEC should make an updated Form 1 available shortly. The new form will permit a PAC to identify itself as a controlled committee.
- After March 19, 2009, bundling by lobbyists and entities registered under the Lobbying Disclosure Act will be reported to the FEC. Bundling activity prior to that date does not have to be disclosed.
- After April 18, 2009, bundling by controlled committees will be reported to the FEC. The delay in reporting bundling by controlled committees takes into account that controlled committees do not have to file amended Form 1's identifying themselves as such until March 29, 2009.
- Authorized candidate committees, leadership PACs and political party committees ("reporting committees") must begin filing new bundling disclosure reports (Form 3L) on the following dates:
  - By May 20, 2009, monthly filers must report on bundled contributions received in April. (Monthly filers can also elect to report quarterly.)
  - By July 15, 2009, quarterly filers must report on bundled contributions received in April, May and June.
  - By July 31, 2009, all reporting committees must file a semi-annual report on bundled contributions received from March 19 (thirty days after publication in the Federal Register) to June 30.

A more complete description of these rules appears in our February 4, 2009 E-Alert.

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