Campaign Reporting Laws: The Inadequacies of Disclosure

by Kim Kebschull

It's not often that political events in Washington lead directly to legal reforms in the state capital, but that's exactly what happened with campaign finance and specifically with new laws requiring greater disclosure of campaign finance activities. North Carolina's Campaign Reporting Act was enacted by the North Carolina General Assembly on April 11, 1974,[1] as a direct result of the Watergate scandal that eclipsed the presidency of Richard M. Nixon.

Millions of dollars were contributed under questionable circumstances to President Nixon's 1972 re-election campaign thanks to the efforts of Nixon's fundraisers, whose practices "bordered on extortion."[2] They developed a "quota system" which set an expected "standard" contribution by wealthy individuals (1 percent of their net worth) and corporations (1 percent of gross annual sales).[3]

Along with the 1974 amendments to the Federal Elections Campaign Act of 1971, these new state campaign finance laws attempted to address two major problems that Watergate had made glaringly obvious. Because of the secrecy surrounding contributions in the 1972 presidential campaign and the subsequent revelations of the Nixon administration's activities, the state laws were designed first to disclose to the public where and from whom a candidate got the money to run for office, and how this money had been expended. Second, the laws aimed to reduce the influence of a few very wealthy individuals who virtually could bankroll entire campaigns.

By setting limits on the amount of money a person or political committee could contribute to a candidate, the new laws attempted to encourage a number of important changes in the field of campaign finance. These included enhancing participation by large numbers of citizens who would give small amounts of money, diminishing the influence of large contributors or interest groups, reducing the appearance of a corrupting link between contributions and pending legislation, and slowing the rising cost of campaigns.[4]

North Carolina's Campaign Reporting Act has two primary goals: *public disclosure* of campaign contributions and expenditures, and facilitating *broader public participation* by limiting the amounts individuals and certain groups can contribute. Why is this important? Consider the words of Herbert Alexander, an expert on the subject of campaign finance: "Journalists, political scientists, elected officials, and numerous interested citizens are participating, perhaps as never before, in a lively exchange over the place and influence of money in election campaigns and legislative politics. That is a salutary development, for money, I have long held, serves as a tracer element in the study of political power."[5]

Money—in large amounts—is the lifeblood of political campaigns today at all levels, from the race for president of the United States to a seat in a part-time (and relatively low-paying) state legis-

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lature. In the 1988 campaign for the North Carolina General Assembly, for example, winning candidates for a seat in the House of Representatives spent an average of nearly $15,000, and the average successful North Carolina state Senate candidate spent more than $20,000. One candidate for the state Senate spent more than $117,000 to win his contested seat, while one House member spent just over $55,000 on his campaign. Winning legislative candidates raised a total of $2.9 million in 1988; this sum is a full 87 percent higher than the amount raised just four years before, according to an analysis by *The Charlotte Observer*.[6] The gubernatorial nominees of the Republican and Democratic parties spent even more—more than $6.3 million for Gov. James G. Martin and almost $5 million for Democratic challenger Robert B. Jordan, III.[7] This followed the most expensive U.S. Senate race ever—the 1984 contest between Sen. Jesse Helms and former Gov. Jim Hunt, which cost more than $20 million.

Some political scientists consider these expenditures to be the cost of educating the public on the policy issues confronting them. Although these educational expenses rise with every election campaign, many analysts are concerned less with the actual dollar amounts contributed and expended than with determining the *sources* of the contributions and the identities of the contributors, as well as information on how and where the money was spent. This identification of sources is done with the help of state disclosure laws, which require financial information of varying degrees of specificity, depending on state policy.

A 1989 study by the national public interest group Common Cause said, "Disclosure continues to be the most basic element in campaign finance reform. Campaign finance disclosure statutes play a vital role in enabling the public to trace candidate contributions to their sources and reveal the potential influence of large donors."[8] University of Virginia Political Scientist Larry J. Sabato says, "Disclosure itself generates pressure for more reform. When campaign finance was out of sight, it was out of most people's minds; now that the trail of money can be more easily followed, indignation is only a press release away."[9]

To determine the availability, accessibility, and comprehensiveness of the disclosure information compiled by North Carolina and other states, the N.C. Center for Public Policy Research surveyed each state agency responsible for gathering or maintaining campaign finance reports. All 50 states and the District of Columbia responded.

1. Where Are Reports Filed?

One of the major goals of campaign disclosure laws is the availability and accessibility to the public of the information disclosed by candidates, parties, and political committees. Forty-six states require candidates for both statewide offices (such as the governorship) and for the state legislature to file with a central state reporting agency. Some states, such as Tennessee and Virginia, require legislative candidates to submit reports simultaneously to the central state agency and to the board of elections in their county of residence. In Ohio, Nevada, and Vermont, legislative candidates file with their county or district office, and these offices then forward copies of

the candidates' reports to the central state agency.

Although candidates for all 10 statewide Council of State offices in North Carolina submit disclosure reports to the State Board of Elections in Raleigh, only legislative candidates from *multi-county* districts must file with the State Board of Elections; candidates from *single-county* districts file solely with their county boards of elections. The State Board therefore has reports for only 40 of the 50 state Senate races and only 76 of the 120 state House races; the others are scattered in 16 counties across the state. To see all the campaign finance reports and gather financial information on the races for all General Assembly seats, a citizen or reporter would have to travel to 16 different counties across the state—from Onslow County in the East to Henderson County in the West, a distance of nearly 350 miles.[10] In addition to this accessibility problem, uniform reporting, auditing, and enforcement standards are more difficult to maintain, possibly allowing some violations to go undetected. The Center's research found that only three states other than North Carolina do not require some form of centralized filing for both statewide and legislative candidates.

Recommendation: **As is the practice in 46 other states, all candidates for both statewide and legislative offices in North Carolina should be required to file with the State Board of Elections in Raleigh. Simultaneous filing by candidates with both the state and their county boards of elections would be the most time-efficient method and would ensure immediate availability of the reports to the public. Alternatively, the county boards of elections could submit copies of the reports to the State Board of Elections once they have been filed with the county.**

2. Penalties for Noncompliance

Most campaign reporting agencies say they are underfinanced, understaffed, and overworked. In addition to receiving, filing, and auditing contribution and expenditure disclosure reports, the agencies also write and implement campaign finance regulations, give advisory opinions, and conduct investigations of reporting irregularities. Because of their workload, notes expert Herbert Alexander, most commissions rely on complaints filed by others and on investigative newspaper reporting to detect violations.[11]

Penalties for noncompliance with reporting requirements depend upon the severity of the offense. By independent accounts of most analysts, actual *enforcement* of these penalties is uniformly lax across the United States. Attorney Christopher Cherry, author of an extensive study of state campaign finance laws, writes, "Enforcement statistics are sparse, but the available information indicated that except for fines for tardy disclosure, most states seldom impose civil penalties and virtually never invoke criminal sanctions. Even with late fees, agencies tend to impose the minimum penalty available and sometimes impose none at all."[12]

Twenty-four states, including North Carolina, have fines only for late filing, ranging from $10 per day late in eight states to $1,000 per day late in Ohio for statewide candidates' pre-election reports. North Carolina's fine is $20 per day late, not to exceed five days or $100. According to the State Board of Elections, about 6 percent or 75 out of approximately 1,200 filings during statewide election campaigns are more than five days late. Since fiscal year 1985-86, the Campaign Reporting Office has levied the $20 per-day-late fine 2,223 times, netting the office a total of $44,460.[13]

Penalties for not filing disclosure reports were considerably more severe, often resulting in criminal prosecution or denial of the election or nomination. In North Carolina, if candidates or committees fail to file reports, the Campaign

Provisions in Campaign Reporting Laws Designed to Discourage Potentially Corrupting Influences

1) A prohibition or limit on direct corporate or union contributions
2) A prohibition or limit on contributions by regulated industries
3) Limits on contributions by political action committees
4) A prohibition or limit on solicitation of or by government employees

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Former Louisiana Governor Edwin Edwards, on receiving illegal corporate campaign contributions: "It is illegal for them to give but not for me to receive."

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Reporting Office will send the non-filers up to three letters requesting compliance before reporting them to the county's district attorney. Until October 1987, North Carolina law specified a fine of up to $1,000 for an individual and $5,000 for others (such as political action committees) and imprisonment up to one year. Current North Carolina law merely designates such offenses as misdemeanors to be reported for prosecution to the appropriate agency.

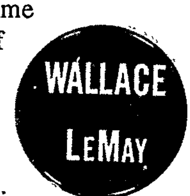
Recommendation: **Because full and prompt disclosure by candidates and committees is a key component of campaign finance laws, penalties for noncompliance with reporting requirements should be sufficiently severe in order to compel voluntary compliance. The N.C. Center for Public Policy Research recommends that these penalties be stated more specifically in North Carolina law, with forfeiture of the nomination or election specified as the penalty for serious campaign finance violations such as intentional misreporting. Penalties for not filing should be restored to their pre-October 1987 level of up to $1,000 for an individual, $5,000 for other offenders, and imprisonment for up to one year. North Carolina law should be amended to provide that candidates may not take office until their reports are filed. Additionally, the Center recommends that the current fine of $20 per day for late reports be raised to $50 per day, and that late filers' names be listed publicly in local newspapers as in Hawaii and Indiana, in order to encourage greater compliance.**

3. Information Required in Reports

Political contributions fall into three broad categories: *money* (whether cash or check), *loans* (either by the candidate to his own cause or from a supporter or bank), and *in-kind* contributions. The laws of all states require some form of disclosure of all monetary contributions, and the disclosure of loans is required by all but four states.

In-kind contributions are more complex to regulate; the term refers to goods or services provided free of charge or at reduced rates by a supporter. The most common in-kind contributions include computer services, office space, and the use of automobiles, for example. North Carolina law requires that all in-kind contributions be reported in full, and that they appear on disclosure reports as both contributions *and* expenditures.

Most state laws set a floor for the itemization of contributions received by candidates, political parties, political action committees (PACs), and other political committees. The itemization threshold in North Carolina is $100; under this regulation, any single contribution over $100 or the aggregate of several contributions by an individual or group exceeding $100 must be reported, along with the contributor's name and address, amount and date of the contribution, and the total amount of all contributions received from this person or group.



Five states have itemized disclosure for all contributions of *any* amount; the laws of these states do not specify minimum amounts or thresholds for reporting. Nineteen states require itemized disclosure for contributions of less than $100 in some races; 10 of these states itemize amounts of less than $50. Twenty states including North Carolina itemize contributions once they reach $100, and eight states have initial thresholds higher than $100, ranging from Illinois' $150 to $500 in Mississippi for statewide candidates and $500 in Nevada for all candidates.

In addition to requiring the name and address of the contributor and the amount of the contribution once the threshold is reached, 20 states also require disclosure of the occupation or principal place of business of the contributor. This information allows for more complete tracing of the sources of contributions and the interests behind them. North Carolina does not require any listing of a contributor's occupation.

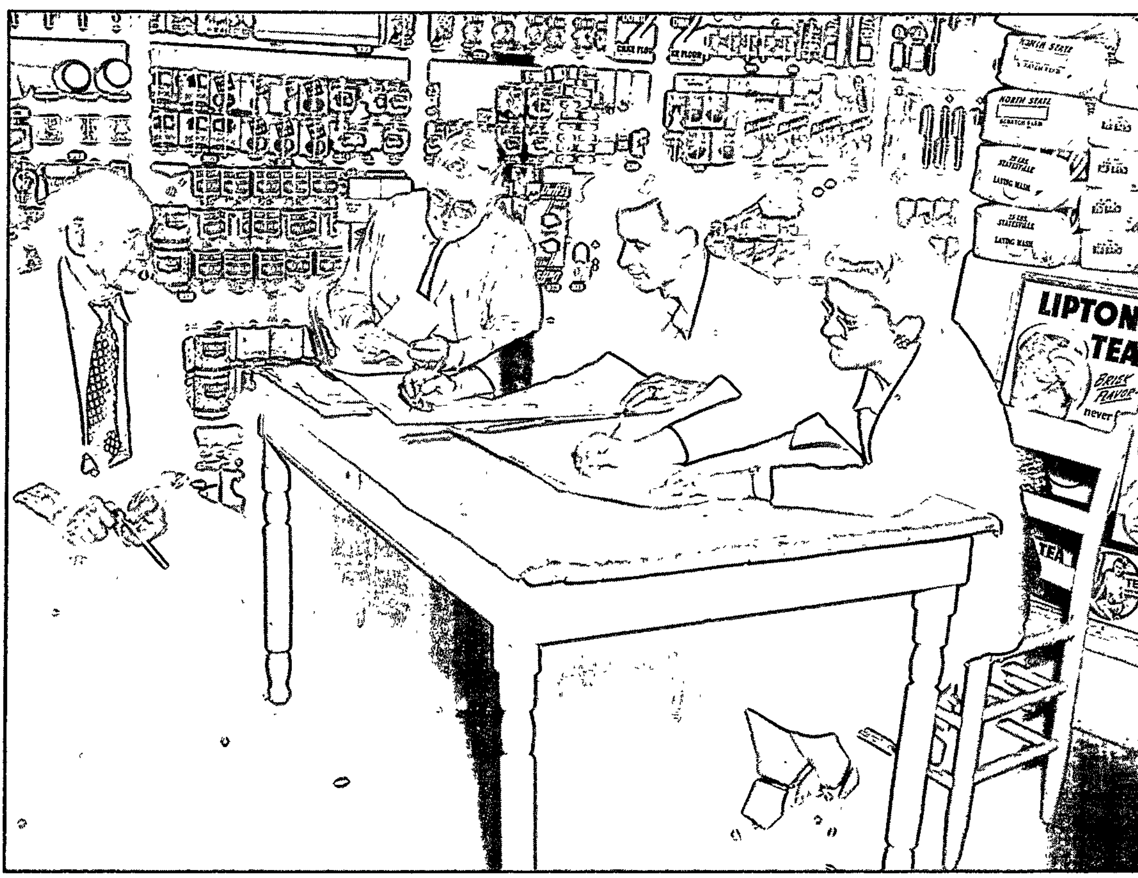
Recommendation: **North Carolina should join the federal government and the 20 states that require the listing of the occupation and/or principal place of employment of contributors to candidates, parties, PACs, and other political committees. This information would enable voters to see the sources of funding for candidates and to analyze the interests supporting a particular candidate or political action committee.**

4. Sources of Contributions

State laws may also regulate the sources of political contributions, and often place limits upon contributions from particular sources. Since few states allow unrestricted contributions, the survey also asked for the limitations that were placed on the amount of contributions from the various sources.

Among the most important findings, the Center's survey revealed that seven states, including North Carolina, prohibit both corporations and labor unions from contributing *directly* from their treasuries. This is done, according to University of California-Berkeley Political Science Professor Edwin M. Epstein, in order to avoid the perception that large economic interests could subvert the integrity of the political process by dominating the selection of public officials. Furthermore, prohibitions against corporate and union contributions exist to protect corporate shareholders and union members from having their invested or contributed money used to finance candidates and causes to which they had not assented.[14] These seven states prohibiting direct corporate and union contributions do permit the groups to overcome this restriction by forming

Election officials tabulate votes at a Raleigh precinct in the primary election on April 8, 1947.



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and registering PACs, however. They may then solicit contributions from employees or members to give to candidates or parties.

North Carolina's contribution limit for PACs is $4,000 per candidate per election. This same limit applies to contributions from all other groups and individuals except for political parties and the candidate and his or her immediate family, who may give unlimited amounts. Most states limit corporate and union contributions to between $1,000 and $5,000 per candidate. Contributions from industries regulated by the state are permitted in 30 states and the District of Columbia and are prohibited in 20. North Carolina prohibits direct contributions to candidates not only from industries regulated by the state—such as banks, savings and loans, and insurance companies—but from all corporations.

Political Action Committees (PACs), virtually unknown prior to the 1970s, are now a significant factor in almost all races at the statewide and legislative level. Twenty-five states allow unlim-

Table 1. Summary of Campaign Contribution Reporting Requirements

Reports Required From Candidates, Political Action Committees, and Parties

State	Maximum Number of Reports Filed by Candidates for Statewide Office	$ Amount at Which Contributions Must Be Itemized	Occupation of Contributor Required?
Alabama	5	$10	No
Alaska	7	$100	Yes
Arizona	6	$25	No
Arkansas	6	$250	Yes
California	7	$100	if > $100
Colorado	5	$25	No
Connecticut	4	$30	if > $1000
Delaware	3	$100	No
Florida	6	All	Yes
Georgia	8	$100	No
Hawaii	4	$100	No
Idaho	5	$50	No
Illinois	4	$150	No
Indiana	4	$100	No
Iowa	4	$25/candidate,$200/PAC	No
Kansas	3	$50	Yes
Kentucky	7	$300	Yes
Louisiana	8	All	No
Maine	7	$50	if > $50
Maryland	5	All	No
Massachusetts	Bi-monthly	$50	No
Michigan	4	$20	if > $200
Minnesota	3	$100	Yes
Mississippi	4	$500/statewide candidate; $200/leg. and others	Yes
Missouri	9	$100	No
Montana	8	$75/statewide candidate; $35/leg. and others	Yes

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ited PAC contributions in most races. Seventeen states limit PAC contributions in some races to $2,000 or less per candidate per election. Only eight states with limits on PAC contributions allow higher aggregate PAC contributions than does North Carolina with its $4,000 per candidate per election limit.

Unlimited contributions by individuals are permitted by 21 states for certain races, while 22 states limit individual contributions to $2,000 and less, depending upon the specific race. North Carolina and nine other states set the maximum individual contribution limit at more than $2,000 per candidate in some races—$4,000 in North Carolina's case.

Candidates in North Carolina and 44 other states may contribute unlimited amounts to their own campaigns. In North Carolina, candidates must report both formal contributions to their own efforts and incidental out-of-pocket campaign expenditures. North Carolina does not limit contributions by the candidate's immediate fam-

Table 1. Summary of Campaign Contribution Reporting Requirements, *continued*

Reports Required From Candidates, Political Action Committees, and Parties

State	Maximum Number of Reports Filed by Candidates for Statewide Office	$ Amount at Which Contributions Must Be Itemized	Occupation of Contributor Required?
Nebraska	7	$100	No
Nevada	4	$500	No
New Hampshire	7	$25	if > $100
New Mexico	6	$100	No
New York	6	$100	No
North Carolina	5	$100	No
North Dakota	3	$100	No
Ohio	5	All	No
Oklahoma	4	$200	No
Oregon	6	$100/statewide candidate; $50/leg. and others	Yes
Pennsylvania	7	$50	if > $250
Rhode Island	7	$200	No
South Carolina	3	$100	No
South Dakota	4	$100	Yes
Tennessee	4	$100	No
Texas	6	$50	No, except for PACs
Utah	5	$50	No
Vermont	5	$100	No
Virginia	13	$100	if > $250
Washington	9	$25	No
West Virginia	6	$50	if > $250
Wisconsin	3	$20	if > $100
Wyoming	2	All	No
District of Columbia	10	$50	Yes
Average:	**5.6**	**$96.72**	**Yes: 20 No: 31**

ily, and large gifts by family members have played an important role in North Carolina politics. During the 1984 gubernatorial election, for example, candidate Eddie Knox received $40,128 from family members for his unsuccessful primary campaign alone, and Democratic nominee Rufus Edmisten received more than $25,000 from his father and brother. Unlike North Carolina, the laws of 22 other states do place limits on family contributions. This is done to prevent candidates with wealthy families from "buying" elections or from deterring other candidates with fewer resources from running for office.

Recommendation: The Center for Public Policy Research recommends that North Carolina follow the lead of 22 other states and limit contributions by members of the candidate's family. The state's standard $4,000-per-candidate-per-election limit should be made applicable to contributions by members of a candidate's family as well. This would help both to level the playing field among candidates from a variety of family backgrounds, and would contribute to holding down the cost of campaigns.

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Who are to be the electors of the federal representatives? Not the rich, more than the poor; not the learned more than the ignorant; not the haughty heirs of distinguished names, more than the humble sons of obscure and unpropitious fortune.

— James Madison,
The Federalist Papers No. 57.

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Provisions in State Reporting Laws Designed to Encourage Large Numbers of Citizens to Participate in Campaigns

1) Ceilings on the amount any one individual may contribute

2) Limits on contributions from members of the candidate's family

3) Limitations on contributions from large groups, such as labor unions, corporations, professional associations, and PACs

4) Tax credits and tax deductions for political contributions

5. Additional Analyses by States

In most states, it would be relatively difficult for average citizens to obtain information about their own elected officials on matters such as the amount of money contributed by individuals, as opposed to PACs, or the amount spent by the candidate on television advertising. In North Carolina, the Campaign Reporting Office does compile information on the total amount of all contributions received and all expenditures made by candidates for statewide office and for those legislative candidates who file with the State Board of Elections. This information is available for the three most recent election years. However, the office is not able to break down contributions by source, examine contributions by PACs, or even to conduct cross matches of contributions given and received for auditing purposes, due to a lack of computing facilities.

The campaign finance agencies of 21 states are required to compile some form of summary or report, either on an annual basis or "from time to time." Several states—Hawaii, Missouri, New Jersey, and Oregon, for example—publish exten-

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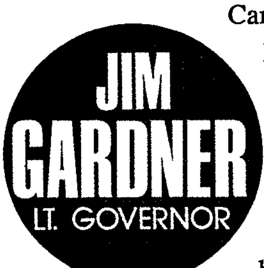
Former University of North Carolina President Frank Graham campaigning for the U.S. Senate in Fuquay, June 17, 1950.

sive and excellent reports for the public about campaign finance. It is worth noting that these state agencies have higher budgets and larger staffs than does North Carolina's Campaign Reporting Office; budgets range from $270,782 in Hawaii to $1,067,000 at New Jersey's Election Law Enforcement Commission.

The budget of North Carolina's Campaign Reporting Office, by contrast, is $139,732 for the 1989-90 fiscal year, with a full-time staff of three persons. Only three of the 37 state reporting agencies that were able to provide budgetary figures have smaller budgets than that of North Carolina.[15] If all the campaign finance reports for both legislative and Council of State offices were maintained by the Campaign Reporting Office, however, the agency would be responsible for the reports of 180 *elected* officials (not to mention those from losing candidates, PACs, and political parties). This figure would be the 14th highest in the United States.[16] The current budget of the Campaign Reporting Office is clearly not commensurate with its responsibilities.



Recommendation: **Disclosure reports at the N.C. Campaign Reporting Office should be computerized and printed in a standard format. Computerizing the vast amount of information collected would permit the office to conduct audits by cross-matching contributions given and received. It would also allow the office to manipulate data and provide breakdowns of contributions and expenditures to and by certain sources, amounts, and offices.**

North Carolina should then follow the lead of the twenty-one states which require annual or periodic reports of campaign finance

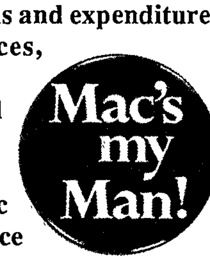


Table 2. Campaign Finance Disclosure Requirements: Where Does North Carolina Fit?

Requirement:	Number of States:	
1) *Requiring* candidates for both statewide and legislative office to file with the central state reporting agency:	46	
Not requiring candidates for both statewide and legislative office to file with the central state reporting agency:		4*
2) Setting contributions disclosure threshold at *$50 or less* in certain races:	25	
Setting contributions disclosure threshold at *$100 or more* in certain races:		28*
3) *Limiting* contributions by a candidate's family:	22	
Not limiting contributions by a candidate's family:		28*
4) Requiring campaign reporting agency to produce *annual* analyses of disclosure reports:	15	
Requiring campaign reporting agency to produce *periodic* analyses of disclosure reports:	6	
Not requiring campaign reporting agency to produce analyses of disclosure reports:		30*
5) *Requiring* occupation of contributor to be disclosed:	20	
Not requiring occupation of contributor to be disclosed:		31*
6) *Permitting* professional associations to make direct contributions to candidates:	39	
Permitting professional associations to contribute to candidate only if PAC is formed:	6*	
Prohibiting contributions from professional associations:		5
7) *Prohibiting* corporations and unions from making *direct* political contributions:		7*
Not prohibiting corporations and unions from making *direct* political contributions:	43	

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** Includes North Carolina*

Table 2. Campaign Finance Disclosure Requirements: Where Does North Carolina Fit?, *continued*

Requirements:	Number of States:	
8) Permitting *unlimited* PAC contributions (in certain races):	25	
Permitting PAC contributions *greater than $2,000* per candidate (in certain races):		16*
Restricting PAC contributions to *$2,000 or less* per candidate (in certain races):	17	
9) *Prohibiting* direct political contributions by regulated industries:		20*
Not prohibiting direct political contributions by regulated industries:	30	
10) Allowing *unlimited* contributions by individuals:	21	
Placing limits on contributions by individuals to candidates for state offices (in certain races):		29*
11) Placing limits on contributions by political parties:	11	
Permitting *unlimited* contributions by political parties:		39*
12) *Requiring* occupation of expenditure recipients to be disclosed:	7	
Not requiring occupation of expenditure recipients to be disclosed:		43*
13) *Limiting* the aggregate amount candidates can receive from PACs:	3	
Not limiting the aggregate amount candidates can receive from PACs:		47*
14) *Requiring* name of contributor's spouse to be disclosed:	1	
Not requiring name of contributor's spouse to be disclosed:		49*

**Includes North Carolina*

Note: Figures in some columns may total more than 50 if the laws apply in the District of Columbia, or if states have separate requirements for candidates for statewide and local office.

activities in the state.

Compiling summary reports and analyses in North Carolina would require additional appropriations and staff for the state's Campaign Reporting Office. The office currently operates with a staff of three and a 1988-89 budget of $139,732. **The Center recommends that the North Carolina General Assembly appropriate an additional $340,000 to the Campaign Reporting Office, bringing its annual budget to approximately $500,000** (still only .0045 percent—less than 1/100 of 1 percent—of the total annual state budget of $12 billion).

The Campaign Reporting Office should then be permitted to hire sufficient additional staff and to purchase the equipment necessary to produce reports for public distribution. These reports should be similar to those compiled by the state of Missouri noted above, giving detailed information about campaign contributions to each legislative and Council of State candidate, analyzing patterns of contributions and expenditures, and summarizing trends in campaign costs. This type of analysis would result in much better use of the data now available in raw form and in much greater public awareness of the role of money in politics and campaigning in North Carolina.

FOOTNOTES

[1] Chapter 1272 of the 1973 Session Laws (2nd Session, 1974), now codified as G.S. Chapter 163, Article 22A. All subsequent provisions of the North Carolina law mentioned in this report can be found in G.S. 163-278.6 to 163-278.40E.

[2] Larry J. Sabato, *PAC Power* (N.Y.: W.W. Norton and Co., 1985), p. 5.

[3] Herbert E. Alexander, "Political Finance Regulation in International Perspective," in *Parties, Interest Groups, and Campaign Finance Laws*, Michael J. Malbin, ed. (Washington, D.C.: American Enterprise Institute, 1980), p. 340.

[4] Herbert E. Alexander, *Financing Politics: Money, Elections, and Political Reform* (Washington, D.C.: Congressional Quarterly Press, 1980), pp. 60-61.

[5] California Commission on Campaign Financing, *The New Gold Rush: Financing California's Legislative Campaigns* (Los Angeles: The Center for Responsive Government, 1985), p. 215.

[6] Jim Morrill, "Lobbyists Escalate 'Arms Race,'" *The Charlotte Observer*, April 9, 1989, p. 1A.

[7] Data on expenditures tabulated and supplied by the Campaign Reporting Office of the North Carolina State Board of Elections.

[8] Michael S. Ashford, *Campaign Finance Reform in the States* (Washington, D.C.: Common Cause, March, 1989), p. 17.

[9] Larry J. Sabato, *Paying for Elections: The Campaign Finance Thicket* (N.Y.: Priority Press Publications, 1989), p. 61.

[10] Candidates for 227 *judicial* seats in North Carolina, including those for the state Supreme Court, Court of Appeals, Superior Court, and District Court judges, as well as district attorneys from multi-county districts, must also file with the Campaign Reporting Office.

[11] Alexander, *Financing Politics*, p. 172.

[12] Christopher Cherry, "State Campaign Finance Laws: The Necessity and Efficacy of Reform," *Journal of Law and Politics* (Charlottesville, Va., Winter 1987), p. 587.

[13] Information on fines provided by Ann Byerly of the North Carolina State Board of Elections, January 25, 1990.

[14] Edwin M. Epstein, "Business and Labor Under the Federal Election Campaign Act of 1971," in *Parties, Interest Groups, and Campaign Finance Laws*, Michael J. Malbin, ed. (Washington, D.C.: American Enterprise Institute, 1980), p. 110.

[15] Joyce Bullock, ed., *Campaign Finance, Ethics, and Lobby Law Blue Book 1988-89* (Lexington, Ky.: Council on Governmental Ethics Laws in conjunction with the Council of State Governments, 1988), pp. 20-25.

[16] William Carlton Currens, ed., *The Book of the States, 1988-89 Edition* (Lexington, Ky.: The Council of State Governments, 1988), pp. 51-52.

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"There is nothing wrong with accepting money for supporting positions I would advocate anyway."

"And what are the positions you will advocate?"

"Whichever ones they want me to."

—Joseph Heller
Good As Gold

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