**SUPER PAC CORRECT THE RECORD ANNOUNCED IT WOULD COORDINATE WITH THE CLINTON CAMPAIGN..**

**Washington Post: Correct The Record Announced That It Would “Work In Coordination With The Clinton Campaign As A Stand-Alone Super PAC.”** Hillary Clinton’s campaign plans to work in tight conjunction with an independent rapid-response group financed by unlimited donations, another novel form of political outsourcing that has emerged as a dominant practice in the 2016 presidential race. On Tuesday, Correct the Record, a pro-Clinton rapid-response operation, announced it was splitting off from its parent American Bridge and will work in coordination with the Clinton campaign as a stand-alone super PAC. The group’s move was first reported by the New York Times.” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**…AND WOULD NOT BE INVOLVED WITH INDEPENDENT EXPENDITURES**

**New York Times: “The New Version Of Correct The Record Will Be Able To Communicate With Federal Campaigns And Party Committees, As It Is Not Involved With Independent Expenditures.”** [New York Times, [5/12/15](http://www.nytimes.com/politics/first-draft/2015/05/12/hillary-clinton-aligned-group-gets-closer-to-her-campaign/?_r=0)]

**SEVERAL CAMPAIGN FINANCE EXPERTS SAID THIS SETUP WOULD “TEST THE LEGAL LIMITS” OF FEC RULES**

**Washington Post: Correct The Record’s Decision To Coordinate With The Clinton Campaign “Befuddled Many Campaign Finance Experts...[And] Several Said The Relationship Between The Campaign And The Super PAC Would Test The Legal Limits.”** “That befuddled many campaign finance experts, who noted that super PACs, by definition, are political committees that solely do independent expenditures, which cannot be coordinated with a candidate or political party. Several said the relationship between the campaign and the super PAC would test the legal limits.” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**CORRECT THE RECORD PLANNED TO AVOID THE BAN ON SUPER PACS COORDINATING WITH CAMPAIGNS BY RELYING ON AN EXCEPTION COVERING INTERNET CONTENT…**

**Washington Post: “Correct The Record Believes It Can Avoid The Coordination Ban By Relying On A 2006 Federal Election Commission Regulation That Declared That Content Posted Online For Free, Such As Blogs, Is Off Limits From Regulation.”** “But Correct the Record believes it can avoid the coordination ban by relying on a 2006 Federal Election Commission regulation that declared that content posted online for free, such as blogs, is off limits from regulation. The ‘Internet exemption’ said that such free postings do not constitute campaign expenditures, allowing independent groups to consult with candidates about the content they post on their sites. By adopting the measure, the FEC limited its online jurisdiction to regulating paid political ads.” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**…AN EXCEPTION WHICH A FORMER FEC CHAIRMAN AND REPUBLICAN ATTORNEY AFFIRMED AS BROAD**

**Former Federal Election Commission Chairman Toner: FEC Rules “Totally Exempt Individuals Who Engage In Political Activity On The Internet From The Restrictions Of The Campaign Finance Laws… Protect[ing] Internet Activities By Individuals In All Forms, Including E-Mailing, Linking, Blogging, Or Hosting A Web Site.”** “The rules ‘totally exempt individuals who engage in political activity on the Internet from the restrictions of the campaign finance laws. The exemption for individual Internet activity in the final rules is categorical and unqualified,’ then-FEC Chairman Michael E. Toner said at the time, according to a 2006 Washington Post story. The regulation ‘protects Internet activities by individuals in all forms, including e-mailing, linking, blogging, or hosting a Web site,’ said Toner, now a prominent Republican campaign finance attorney.” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**CORRECT THE RECORD SAID THE INTERNET EXCEPTION “HAS BEEN RELIED UPON COUNTLESS TIMES BY ORGANIZATIONS RAISING NON FEDERAL MONEY” AND THAT CTR WOULD MAKE ITS CONTRIBUTIONS AND EXPENDITURES PUBLIC**

**Correct The Record Spokeswoman On Use Of Internet Exception To Campaign Finance Laws: “This Exception Has Been Relied Upon Countless Times By Organizations Raising Non-Federal Money. The Only Thing Unique About Correct The Record Is That It Is Making Its Contributors And Expenditures Public.”** “‘The FEC rules specifically permit some activity – in particular, activity on an organization’s website, in email, and on social media – to be legally coordinated with candidates and political parties,’ Adrienne Watson, a spokeswoman for Correct The Record, said in a statement. ‘This exception has been relied upon countless times by organizations raising non-federal money. The only thing unique about Correct the Record is that it is making its contributors and expenditures public.’” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**WHILE FEC RULES STATE THE INTERNET EXEMPTION CAN ONLY BE USED BY UNCOMPENSATED INDIVIDUALS, CORRECT THE RECORD SAID THEY WERE RELYING ON AN EXEMPTION WITHIN THE DEFINITION OF COORDINATED COMMUNICATIONS**

**Washington Post: “FEC Rules Specify That Online Activities Are Exempted From Campaign Finance Rules If They Are Conducted By ‘Uncompensated’ Individuals, Campaign Finance Lawyers Noted. It Is Unclear How Correct The Record, Whose Staff Will Be Paid, Plans To Navigate That Restriction.”** “However, the FEC rules specify that online activities are exempted from campaign finance rules if they are conducted by ‘uncompensated’ individuals, campaign finance lawyers noted. It is unclear how Correct the Record, whose staff will be paid, plans to navigate that restriction. ‘The moment anyone is paid to engage in Internet activity it falls outside of that exemption,’ said Jason Torchinsky, an election law attorney who represents many conservative groups. ‘If you are a super PAC paying people and coordinating your activities with the campaign, you are not covered by the individual Internet exemption and are making impermissible in-kind contributions.’” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**Washington Post: “Correct The Record Officials Say They Are Not Relying On The Individual Internet Exemption, But Rather A Related Exemption In The Definition Of Coordinated Communications.”** [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]

**A WATCHDOG GROUP WARNED THAT IF CORRECT THE RECORD IS COORDINATING WITH THE CLINTON CAMPAIGN ON POLICY, IT WOULD VIOLATE CAMPAIGN FINANCE LAWS**

**Democracy 21 President Wertheimer: “If This Entity Is Operating As A Policy Arm Of The Campaign, It Will Be Violating The Coordination Laws If It Raises And Spends Soft Money, Whether Or Not It Runs Ads Or Other Public Communications.”** “Fred Wertheimer, president of the advocacy group Democracy 21, said ‘it certainly looks like this new operation will violate the Bipartisan Campaign Reform Act, which prevents an entity set up by a candidate or acting on behalf of a candidate, from raising or spending unlimited contributions, or soft money.’ ‘In addition, if this entity is operating as a policy arm of the campaign, it will be violating the coordination laws if it raises and spends soft money, whether or not it runs ads or other public communications,’ he added.” [Washington Post, [5/12/15](http://www.washingtonpost.com/blogs/post-politics/wp/2015/05/12/how-a-super-pac-plans-to-coordinate-directly-with-hillary-clintons-campaign/)]