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For meeting of July 13, 2017
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July 12, 2017

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson *NFS for LJS*
Acting General Counsel

Neven F. Stipanovic *NFS*
Acting Assistant General Counsel

Joseph P. Wenzinger *JPW*
Attorney

Subject: AO 2017-05 (GAP and CDP) Draft B

Attached is a proposed draft of the subject advisory opinion.

Members of the public may submit written comments on the draft advisory opinion. We are making this draft available for comment until 9:00 am (Eastern Time) on July 13, 2017.

Members of the public may also attend the Commission meeting at which the draft will be considered. The advisory opinion requestor may appear before the Commission at this meeting to answer questions.

For more information about how to submit comments or attend the Commission meeting, go to <https://www.fec.gov/legal-resources/advisory-opinions-process/>

Attachment

1 ADVISORY OPINION 2017-05

2

3 Dan Backer, Esq.
4 political.law
5 203 South Union Street
6 Suite 300
7 Alexandria, VA 22314

DRAFT B

8

9 Dear Mr. Backer:

10 We are responding to your advisory opinion request on behalf of Great America PAC and
11 The Committee to Defend the President, concerning the application of the Federal Election
12 Campaign Act, 52 U.S.C. §§ 30101-43126 (the “Act”), and Commission regulations to your
13 proposal to use Twitter handles in disclaimers on public communications, emails, and websites,
14 and to maintain Twitter profiles without a disclaimer.

15 The Commission concludes that Great America PAC may use its Twitter handle in lieu of
16 its full name in disclaimers, and that The Committee to Defend the President may include its
17 Twitter handle along with its full name as long as the disclaimer’s language makes clear that the
18 committee is paying for the communication, but that neither committee may use Twitter handles
19 as an alternative to their permanent street address, telephone number, or World Wide Web
20 address. The Commission also concludes that while the requestors must include disclaimers on
21 their Twitter profiles, they may satisfy this requirement by including in their Twitter profiles
22 their respective names, Twitter handles, website addresses, and links to their traditional websites
23 bearing a standard disclaimer. Finally, the requestors may not satisfy the disclaimer
24 requirements by including a graphic bearing the standard disclaimer if such graphic is not
25 available or visible on certain mobile devices.

1 ***Background***

2 The facts presented in this advisory opinion are based on your letter received on June 5,
3 2017, and publicly available information.

4 Great America PAC and The Committee to Defend the President are nonconnected
5 political committees.¹ Advisory Opinion Request at AOR002. They each maintain a publicly
6 accessible Twitter profile,² and they assert that they plan to make independent expenditures for
7 various types of communications that are within the scope of the disclaimer requirements under
8 the Act and Commission regulations, including “public communications” within the meaning of
9 11 C.F.R. § 100.26 (for example, certain broadcast, cable, newspaper, magazine, and mass
10 mailings), emails of substantially similar content distributed to more than 500 recipients, and
11 their respective publicly accessible websites. AOR002-003.

12 Twitter is free to use and “allows users to disseminate, receive, and read online messages
13 called ‘tweets,’ which may include text, hypertext links, audio, and video components.”
14 AOR002. Before sending tweets, each user must obtain a unique Twitter “handle” — a
15 username preceded by the “@” symbol — at which point “Twitter automatically creates a
16 Twitter profile page under the Twitter.com domain.” *Id.* As noted in the request, a “profile page
17 displays the user’s name and handle; a biography or description of the user, not exceeding 160
18 characters; the web address for, and hypertext link to, the user’s home page; a personal picture
19 and header picture; and a list of the user’s [t]weets.” *Id.* Though users create the content for

¹ See The Committee to Defend the President, Statement of Organization, FEC Form 1, Amend (Jan. 28, 2017), <http://docquery.fec.gov/pdf/619/201701289041532619/201701289041532619.pdf>; Great America PAC, Statement of Organization, FEC Form 1, Amend (May 26, 2016), <http://docquery.fec.gov/pdf/493/201605269017304493/201605269017304493.pdf>.

² See The Committee to Defend the President, @Defend_Trump, https://twitter.com/defend_trump?lang=en; Great America PAC, @GreatAmericaPAC, https://twitter.com/GreatAmericaPAC?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor.

1 their Twitter profiles, Twitter maintains ownership interests in its software (which it merely
2 licenses to users for free) and retains the right to “remove or refuse to distribute any [c]ontent on
3 [its] [s]ervices, suspend or terminate users, and reclaim usernames.”³

4 Great America PAC’s Twitter handle is @GreatAmericaPAC. *Id.* at AOR003. By
5 contrast, as acknowledged in the request, The Committee to Defend the President’s Twitter
6 handle — @Defend_Trump — is not “materially identical” to its name. *Id.*

7 ***Questions Presented***

8 1. *When Great America PAC pays for and disseminates a communication subject to the*
9 *disclaimer requirements of 11 C.F.R. § 110.11, would including the committee’s Twitter handle*
10 *in the disclaimer, when either written or spoken, in lieu of the committee’s actual name satisfy*
11 *the requirement that the committee include its “full name” in the disclaimer?*

12 2. *When The Committee to Defend the President pays for and disseminates a*
13 *communication subject to the disclaimer requirements of 11 C.F.R. § 110.11, may it satisfy the*
14 *requirement to include its “full name” in disclaimers by including both its full name and Twitter*
15 *handle?*

16 3. *When Great America PAC or the Committee to Defend the President pays for and*
17 *disseminates a communication subject to the disclaimer requirements of 11 C.F.R. § 110.11,*
18 *would including the committee’s Twitter handle in the disclaimer satisfy the requirement that the*
19 *committee include its “permanent street address, telephone number, or World Wide Web*
20 *address” in the disclaimer?*

21 4. *If the answer to Question 3 is no, would including Great America PAC’s or The*
22 *Committee to Defend the President’s Twitter handle in the disclaimer satisfy the requirement*

³ Twitter, Terms of Service ¶ 4, <https://twitter.com/en/tos> (last visited June 19, 2017).

1 *that the committee include its “permanent street address, telephone number, or World Wide Web*
2 *address” in the disclaimer if its Twitter profile page included the committee’s website address*
3 *and a hypertext link to the committee’s website, which contained the committee’s permanent*
4 *street address, telephone number, or World Wide Web address?*

5 5. *May Great America PAC and The Committee to Defend the President use Twitter without*
6 *including a disclaimer on their respective profile pages?*

7 6. *If the answer to Question 5 is no, may Great America PAC and The Committee to Defend*
8 *the President satisfy the Act and Commission regulations by ensuring that their Twitter profile*
9 *pages specify, in locations permitted by Twitter, the respective committee’s name, the*
10 *committee’s Twitter handle, the web address of the committee’s traditional homepage which*
11 *contains a standard disclaimer, and a hypertext link to that homepage?*

12 7. *If the answer to Question 5 is no, may Great America PAC and The Committee to Defend*
13 *the President satisfy the Act and Commission regulations by ensuring that their Twitter profile*
14 *pages contain a graphic bearing a standard disclaimer, even if the disclaimer may not be visible*
15 *when the profile page is viewed on certain mobile devices?*

16 ***Legal Analysis and Conclusions***

17 1. *When Great America PAC pays for and disseminates a communication subject to the*
18 *disclaimer requirements of 11 C.F.R. § 110.11, would including the committee’s Twitter handle*
19 *in the disclaimer, when either written or spoken, in lieu of the committee’s actual name satisfy*
20 *the requirement that the committee include its “full name” in the disclaimer?*

21 Yes, Great America PAC may use its Twitter handle in lieu of its actual name, in both
22 written and spoken disclaimers, because the Twitter handle unambiguously identifies the
23 political committee.

1 Any “public communication,” *see* 11 C.F.R. § 100.26,⁴ made by a political committee,
2 electronic mail of more than 500 substantially similar communications sent by a political
3 committee, and all websites of political committees available to the general public must contain a
4 disclaimer to identify who paid for the communication. 52 U.S.C. § 30120(a); 11 C.F.R.
5 § 110.11(a). When a communication is not authorized by a candidate, an authorized committee
6 of a candidate, or an agent of either, the disclaimer must “clearly state the full name . . . of the
7 person who paid for the communication, and that the communication is not authorized by any
8 candidate or candidate’s committee.” 11 C.F.R. § 110.11(b)(3). In such communications
9 transmitted through radio, television, broadcast, cable, or satellite, the disclaimer must include an
10 audio statement with “the name of the political committee” immediately followed by “is
11 responsible for the content of this advertising.” *Id.* § 110.11(c)(4). Disclaimers “must be
12 presented in a clear and conspicuous manner, to give the reader, observer, or listener adequate
13 notice of the identity of the person or political committee that paid for the communication.” 11
14 C.F.R. § 110.11(c)(1).

15 Here, Great America PAC proposes to use its Twitter handle — @GreatAmericaPAC —
16 as its name in both written and spoken disclaimers. Where written, the disclaimer would read
17 “Paid for by @GreatAmericaPAC,” and the addition of the “@” symbol would not obscure the
18 name of the entity paying for the communication, which would be unambiguously identified as
19 Great America PAC. *See* Advisory Opinion 1995-09 (NewtWatch PAC) at 1-2 (permitting
20 “NewtWatch PAC” to use “NewtWatch” as its full name in its disclaimers). Likewise, the

⁴ Commission regulations define “public communication” as “a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising.” 11 C.F.R. § 100.26. Moreover, the “term *general public political advertising* shall not include communications over the Internet, except for communications placed for a fee on another person’s Web site.” *Id.*

1 spoken disclaimer would be “@GreatAmericaPAC is responsible for the content of this
2 advertising,” and again the reading of “at” in front of the political committee’s name would not
3 obscure the name of the payor. Because the use of Great America PAC’s Twitter handle would
4 give adequate notice of the identity of the political committee paying for the communication, it
5 may use its Twitter handle as its name in its disclaimers.

6 2. *When The Committee to Defend the President pays for and disseminates a*
7 *communication subject to the disclaimer requirements of 11 C.F.R. § 110.11, may it satisfy the*
8 *requirement to include its “full name” in disclaimers by including both its full name and Twitter*
9 *handle?*

10 Yes, The Committee to Defend the President may use both its full name and Twitter
11 handle in disclaimers, as long as the disclaimer contains language making clear that the
12 committee is paying for the communication.⁵

13 As discussed in the answer to Question 1 above, where the Act and Commission
14 regulations require communications to “clearly state the name” of a political committee, 52
15 U.S.C. § 30120(a)(3); 11 C.F.R. § 110.11(b)(3) (requiring statement of “full name”), that name
16 “must be presented in a clear and conspicuous manner, to give the reader, observer, or listener
17 adequate notice of the identity of the person or political committee that paid for the

⁵ The Commission notes that The Committee to Defend the President’s Twitter handle —
@Defend_Trump — appears to be inconsistent with 11 C.F.R. § 102.14(a), which provides that, with certain
exceptions, “no unauthorized committee shall include the name of any candidate in its name,” including in any
“special project” name. *See also* Advisory Opinion 2015-04 (Collective Actions PAC) (concluding that
unauthorized committee could not use “@Bernie_Run” as its Twitter handle). The U.S. Court of Appeals for the
D.C. Circuit, however, recently held that there was a “substantial likelihood” this regulation was unconstitutional as
applied to the conduct of a certain unauthorized political committee and remanded to the district court with an order
to enter a preliminary injunction enjoining enforcement of the rule as applied to that committee. *See Pursuing*
America’s Greatness v. FEC, 831 F.3d 500 (2016). Because this litigation is pending and the requestor does not ask
whether it may use the name of a federal candidate in its Twitter handle, the Commission is not answering that
question here.

1 communication,” 11 C.F.R. § 110.11(c)(1). Here, The Committee to Defend the President could
2 use both its full name and Twitter handle without confusing the reader about the identity of the
3 entity paying for the communication, as long as it is clear who is paying for the communication.
4 *See* Advisory Opinion 2011-14 (Utah Bankers Association and Utah Bankers Association Action
5 PAC) at 9 (“The requestors may retain a reference to the [p]roject in [their] disclaimer should
6 they wish to do so, as long as the identity of the payor is clear.”).

7 For example, it would be sufficient for the committee to have a disclaimer stating, “Paid
8 for by The Committee to Defend the President, @Defend_Trump,
9 committeetodefendthepresident.com. Not authorized by any candidate or candidate’s
10 committee.” *See id.* at 9 (approving disclaimer including different name of fundraising project
11 because disclaimer contained language that communication “paid for by” political committee).
12 Thus, the Committee to Defend the President may use its full name and Twitter handle in
13 disclaimers as long as it is clear who is paying for the communication.

14 3. *When Great America PAC or the Committee to Defend the President pays for and*
15 *disseminates a communication subject to the disclaimer requirements of 11 C.F.R. § 110.11,*
16 *would including the committee’s Twitter handle in the disclaimer satisfy the requirement that the*
17 *committee include its “permanent street address, telephone number, or World Wide Web*
18 *address” in the disclaimer?*

19 No, neither Great America PAC nor The Committee to Defend the President may use its
20 Twitter handle in its disclaimers in lieu of its permanent street address, telephone number, or
21 World Wide Web address, because the Act specifically requires certain identifying information
22 that a Twitter handle alone cannot satisfy.

1 In addition to the requirement that communications not authorized by a candidate,
2 candidate’s committee, or its agents must include a disclaimer with the name of who paid for the
3 communication, such disclaimers must also include the “permanent street address, telephone
4 number, or World Wide address” of the payor. 52 U.S.C. § 30120(a)(3); 11 C.F.R.
5 § 110.11(b)(3). The requestors assert that a “Twitter handle plays the same role as a
6 conventional World Wide Web address in directing viewers to a freely accessible internet
7 resource containing information about the PAC sponsoring a communication.” AOR005.

8 Under the specific statutory requirements of the Act, however, a political committee may
9 not substitute alternative identifying information in place of a World Wide Web address. Even if
10 it could, a Twitter handle is different from a World Wide Web address in material respects. The
11 latter includes a “domain name” (for example, greatamericapac.com) that corresponds to a
12 unique “location on the Internet” that a user (particularly one that may be unfamiliar to Twitter)
13 may find by entering it into a web browser.⁶ By contrast, a Twitter handle does not refer directly
14 to a specific place on the internet — it makes no reference to Twitter.com — and the “@”
15 symbol, which is not unique to Twitter, may easily be confused with other social media
16 platforms.⁷ Moreover, a Twitter handle, unlike a domain name, gives no information about what
17 type of organization it references (for example, “.com,” “.org,” or “.gov.”).

18 Thus, neither Great America PAC nor The Committee to Defend the President may use
19 its Twitter handle in disclaimers in lieu of its permanent street address, telephone number, or

⁶ Internet Corporation for Assigned Names and Numbers (“ICANN”), Beginner’s Guide to Domain Names at 3, <https://www.icann.org/en/system/files/files/domain-names-beginners-guide-06dec10-en.pdf> (last visited June 22, 2017).

⁷ See, e.g., Instagram Help Center, https://help.instagram.com/1660923094227526/?helpref=hc_fnav (noting that user may “mention” another user in “story” by “[t]yp[ing] @ followed immediately by their username) (last visited June 22, 2017).

1 World Wide Web address, because a Twitter handle does not provide the identifying information
2 required by the Act.

3 4. *If the answer to Question 3 is no, would including Great America PAC's or The*
4 *Committee to Defend the President's Twitter handle in the disclaimer satisfy the requirement*
5 *that the committee include its "permanent street address, telephone number, or World Wide Web*
6 *address" in the disclaimer if its Twitter profile page included the committee's website address*
7 *and a hypertext link to the committee's website, which contained the committee's permanent*
8 *street address, telephone number, or World Wide Web address?*

9 No, neither Great America PAC nor The Committee to Defend the President may use its
10 Twitter handle in lieu of the identifying information required by the Act, even if its Twitter
11 profile includes the address of, and a hypertext link to, its website containing the committee's
12 permanent street address, telephone number, or World Wide Web address because the Act
13 requires such identifying information to be placed on the communication.

14 As discussed above, the Act is specific that the "*communication* [requiring a
15 disclaimer] . . . shall clearly state the name and permanent street address, telephone number, or
16 World Wide Web address of the person who paid for the communication." 52 U.S.C.
17 § 30120(a)(3) (emphasis added). Though the Commission has recognized "the Internet as a
18 unique and evolving mode of mass communication and political speech that is distinct from other
19 media in a manner that warrants a restrained regulatory approach,"⁸ Internet Communications,
20 71 Fed. Reg. 18589, 18589 (Apr. 12, 2006), here the issue involves all of the Great America

⁸ For example, in Advisory Opinion 2010-19 (Google), the Commission permitted political committees to pay for small Google text advertisements that on their face did not contain a disclaimer, but included a link to a "landing page" that did. That advisory opinion, however, applied only to small text ads on the internet, rather than to all of a political committee's public communications, emails, or websites.

1 PAC's or The Committee to Defend the President's public communications (including broadcast,
2 cable, newspaper, magazine, and mass mailings), emails of more than 500 substantially similar
3 communications, and websites available to the general public. Additionally, there is no
4 suggestion of a new and unique burden or impracticability in continuing to place World Wide
5 Web addresses in disclaimers.

6 Therefore, neither Great America PAC nor The Committee to Defend the President may
7 use its Twitter handle instead of its permanent street address, telephone number, or World Wide
8 Web address, even if its Twitter profile contains a link to its political committee's website,
9 because the Act specifically requires certain identifying information to be placed on the
10 communication requiring a disclaimer.

11 5. *May Great America PAC and The Committee to Defend the President use Twitter without*
12 *including a disclaimer on their respective profile pages?*

13 No, Great America PAC and The Committee to Defend the President may not use Twitter
14 without including a disclaimer on their respective profile pages because a Twitter profile is a
15 website of a political committee under the Act and Commission regulations and such websites
16 require disclaimers.

17 Disclaimer requirements apply to all internet websites of political committees available to
18 the general public. *See* 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a)(1). Similar to traditional
19 websites, Twitter profiles are publicly available on the internet. Though Twitter owns the
20 Twitter.com domain name and reserves certain rights as to its use,⁹ Twitter users create and
21 control their own profile pages. As the Twitter terms of service indicate, “[a]ll [c]ontent is the

⁹ Twitter, Terms of Service ¶ 4, <https://twitter.com/en/tos> (“We may also remove or refuse to distribute any Content on the Services, suspend or terminate users, and reclaim usernames without liability to you.”) (last visited June 19, 2017).

1 sole responsibility of the person who originated such [c]ontent,” and Twitter “may not monitor
2 or control the [c]ontent posted via the [s]ervices” or “take responsibility for such [c]ontent.”¹⁰
3 Because a political committee creates and controls the substantive contents of its Twitter profile
4 and this content is publicly available on the internet, a political committee’s use of a Twitter
5 profile is a “websit[e] of [a] political committee.” 11 C.F.R. § 110.11(a)(1).

6 The requestors argue that the “small items” exception applies to Twitter profiles, but
7 under that exception disclaimers are not required on “[b]umper stickers, pins, buttons, pens, and
8 similar small items upon which the disclaimer cannot be conveniently printed.” 11 C.F.R.
9 § 110.11(f)(1)(i). The Commission has applied this exception to situations where a disclaimer
10 would not fit in the space provided based on the physical limitations of the item or a
11 technological constraint. *See* Advisory Opinion 2002-09 (Target Wireless) (applying exception
12 to communications distributed through wireless telecommunications network where content was
13 limited to 160 characters per page and it was not guaranteed that two pages sent consecutively
14 would be received consecutively); Advisory Opinion 1980-42 (Hart for Senate Campaign
15 Committee, Inc.) (applying exception to concert tickets). By contrast, a Twitter profile allows a
16 political committee to include a biography of 160 characters *and* a separate space for a website
17 address, allowing sufficient room to include a disclaimer on the requestors’ Twitter profiles.¹¹
18 Thus, the “small items” exception does not apply.

¹⁰ *Id.* ¶ 3.

¹¹ For example, The Committee to Defend the President’s Twitter profile currently includes its website address and a biography consisting of 71 characters, including its name. *See* The Committee to Defend the President, @Defend_Trump, https://twitter.com/defend_trump?lang=en (“The official @Twitter account of The Committee to Defend the President.”) (last visited July 11, 2017). Accordingly, the committee has 89 characters remaining, and the “paid for by” language (11 characters) and “not authorized by any candidate or candidate’s committee” (56 characters) plus a period (1 character) add up to only 68. Likewise, Great America PAC’s Twitter profile currently includes its website and a biography consisting of 63 characters, leaving 97 characters remaining. *See* Great America PAC, @GreatAmericaPAC, <https://twitter.com/greatamericapac?lang=en> (“Supporting @realDonaldTrump @POTUS to make America great again!”) (last visited July 11, 2017). The phrase, “Paid for by

1 Last, the requestors contend that it would be impracticable to require them to include
2 disclaimers on their Twitter profiles. Under the “impracticable exception,” disclaimers are not
3 required on “[s]kywriting water towers, wearing apparel, or other means of displaying an
4 advertisement of such a nature that the inclusion of a disclaimer would be impracticable.” 11
5 C.F.R. § 110.11(f)(1)(ii). Apart from the character limitations, which the Commission concluded
6 above do not prevent political committees from including disclaimers on their Twitter profiles,
7 the requestors have not offered any reason for why it would be impracticable for them to include
8 such disclaimers. Indeed, typing a disclaimer when creating a Twitter profile does not impose
9 the same burden as writing a disclaimer on a water tower or a piece of clothing. Thus, the
10 “impracticable exception” does not apply.

11 Given that a political committee’s Twitter profile constitutes the website of a political
12 committee, which requires disclaimers, Great America PAC and The Committee to Defend the
13 President may not use Twitter profiles without disclaimers.

14 6. *If the answer to Question 5 is no, may Great America PAC and The Committee to Defend*
15 *the President satisfy the Act and Commission regulations by ensuring that their Twitter profile*
16 *pages specify, in locations permitted by Twitter, the respective committee’s name, the*
17 *committee’s Twitter handle, the web address of the committee’s traditional homepage which*
18 *contains a standard disclaimer, and a hypertext link to that homepage?*

19

1 This question is moot, as the answer to Question 5 has already established that both Great
2 America PAC and The Committee to Defend the President can provide the required disclosures
3 in the space that Twitter allows for website address and biography.

4 7. *If the answer to Question 5 is no, may Great America PAC and The Committee to Defend*
5 *the President satisfy the Act and Commission regulations by ensuring that their Twitter profile*
6 *pages contain a graphic bearing a standard disclaimer, even if the disclaimer may not be visible*
7 *when the profile page is viewed on certain mobile devices?*

8 No, Great America PAC and The Committee to Defend the President may not satisfy the
9 disclaimer requirements for their Twitter profiles by including a graphic bearing a standard
10 disclaimer, if the disclaimers may not be visible on certain mobile devices, because such an
11 approach would not provide a reliable means for users of certain mobile devices to access the
12 disclaimer.

13 As noted above, the Commission has allowed political committees under certain
14 circumstances to deliver disclaimers in an alternative fashion where new technologies are
15 involved. *See* Internet Communications, 71 Fed. Reg. at 18589; Advisory Opinion 2010-19
16 (Google); Advisory Opinion 2004-10 (Metro Networks, Inc.). Unlike including a website
17 address on a Twitter profile with a link to a website displaying the full disclaimer, as addressed
18 above, including a disclaimer on a graphic that would not be available or visible on certain
19 mobile devices would provide no reliable means of accessing the disclaimer for certain viewers.
20 Accordingly, neither Great America PAC nor The Committee to Defend the President may
21 satisfy the disclaimer requirements by including the disclaimer in a graphic that may not be
22 visible on mobile devices.

23 This response constitutes an advisory opinion concerning the application of the Act and

1 Commission regulations to the specific transaction or activity set forth in your request.
2 *See* 52 U.S.C. § 30108. The Commission emphasizes that, if there is a change in any of the facts
3 or assumptions presented, and such facts or assumptions are material to a conclusion presented in
4 this advisory opinion, then the requestors may not rely on that conclusion as support for its
5 proposed activity. Any person involved in any specific transaction or activity which is
6 indistinguishable in all its material aspects from the transaction or activity with respect to which
7 this advisory opinion is rendered may rely on this advisory opinion. *See* 52 U.S.C.
8 § 30108(c)(1)(B). Please note that the analysis or conclusions in this advisory opinion may be
9 affected by subsequent developments in the law including, but not limited to, statutes,
10 regulations, advisory opinions, and case law. Any advisory opinions cited herein are available
11 on the Commission's website.

12 On behalf of the Commission,
13
14

15
16 Steven T. Walther
17 Chairman