

Sue Rose, Founder and
Managing Member
PoliticalMeetings.com
600 17th ST, 2800 S
Denver, CO 80202
(202) 760-8961

RECEIVED

By Office of the Commission Secretary at 11:23 am, Feb 12, 2024

Federal Election Commission
999 E St., N.W., Washington,
DC 20463
Reg: Advisory Opinion
01/16/2024

Pursuant to 2 U.S.C. § 437f, this letter requests an advisory opinion on the permissibility of a proposed business plan pertaining to PoliticalMeetings.com LLC as deemed permissible by the Federal Campaign Election Act of 1971 ("the Act"). PoliticalMeetings.com LLC was formed on 09/23/2019 with Sue Rose as the sole member. Sue Rose currently manages and operates PoliticalMeetings.com LLC. Please consider that this proposed business plan includes a future conversion from a sole member Limited Liability Company to a Limited Liability Partnership. The Privacy Policy and Terms of Service are available to the public on the website at web domain address <https://PoliticalMeetings.com>.

The PoliticalMeetings.com business plan is to provide subscribers the opportunity to donate to their favorite political candidates and an option to donate \$0.50 cents per month to a Non-profit organization and a National Committee of a Political Party recognized by the Federal Elections Commission. Those people who subscribe to the PoliticalMeetings.com Platform will donate to at least one favorite candidate and can access the nationwide database to learn about politics, public policy, and the candidates competing in elections. The goal has always been to provide people with a way to conduct research on political issues and to learn about candidates running in elections.

History of PoliticalMeetings.com:

During late Spring, 2018, while working as a Federal Contractor, Rose had the desire to provide information on political issues and candidates to employees of corporations and the public. In early 2019, IntegrityLives, LLC was formed and PoliticalMeetings.com was listed as a registered Trade Name and had one customer. The brand has been dormant since that time until now and on 9/22/2023, PoliticalMeetings.com LLC (PM) was formed as its own entity within the State of Colorado and is on record with the office of the Colorado Secretary of State as a Sole Proprietorship and taxed as such by the Internal Revenue Service. PM is a solution that can provide information to the public on meetings about politics.

PROBLEM:

There has not been a national database with political meetings data available in our nation's history. Precinct meetings go unattended and public opinion is swayed by media outlets framing political news.

SOLUTION:

In-house data teams conduct research for meetings on the local, state, and national levels in the top three largest counties of each state to locate meetings. PM publishes this information on our Platform. The Subscriber is the Customer.

¹ For the purposes of this Advisory Opinion Request, the term "user" may refer to all visitors and subscribers who utilize the features on the mobile App or website. PoliticalMeetings.com LLC is the same as PoliticalMeetings.com and throughout this document can be referred to as PM, Where the word "candidate" is used, it means "Candidate Campaign Committee" or a legally formed entity according to campaign finance laws in the jurisdiction of the "Election Campaign." Where the term "Campaign" is used, it is to indicate "Election Campaign" or other legal entity based on campaign finance laws.

PM Business Model:

To provide subscribers with a way to donate to their favorite political candidates and benefit from our database of political meetings.

FEATURES and ADVANTAGES

SUBSCRIBERS

- Increased awareness of public policy, government and the political candidates running for elected office.
- Have access to publicly known political meetings postings within their party affiliation.
- Support candidates with a \$1 donation per month.
- Receive Private Agenda Access to the candidates they donate to.
- Option to support a National Committee of a Political Party recognized by the Federal Elections Commission and a short list of up to five Non-profit organizations focused on supporting the homeless population within the United States.

CANDIDATE

- No cost to the candidate.
- Provides written permission by completing a (Permission Slip.) SEE ADDENDUM "A"
- Candidates receive \$1 per donor per month as a political contribution from the Subscriber.

GOVERNMENT AND POLITICAL PROCESS

- Increased precinct meeting attendance.
- Increased voter participation.

PM will verify that the user has one profile on the Platform by their email address and name on their verified method of payment. A legal identification card is not required.

USER TYPES:

1. Subscriber- The donor that agrees to a subscription rate of \$2.98 per month which includes \$1 per month as a donation to a "Candidate" or "Campaign Committee" and has the option to add to a donation of \$0.50 cents to a Non-profit, and a National Committee of a Political Party recognized by the Federal Elections Commission.
2. Visitor- A visitor to the PM Platform who does not have login credentials and has access to general information and Basic Profiles only.

The following is a list of definitions and terms applicable to this document.

TERMS:

1. Pay Gateway Fee- A payment processing fee charged by a Pay Gateway Merchant such as PayPal, Stripe or other financial institution who facilitates payment processing.
2. Administrative Fee- The fee charged by PoliticalMeetings.com for the services it provides to cover administrative costs of the company.
3. PM Platform- PoliticalMeetings.com website or mobile Application and all other relative components including servers that enables systems to store the data on political meetings, candidates, subscribers, and other meetings sponsors including all other information available on the website or mobile App. The PM Platform provides data through its database called the PM Database.
4. PM Database- All data listed within the Platform.
5. Subscribers- Customers of the PM Platform who subscribe to the PM Database and donate to at least one candidate.

6. Donee- the entity receiving the donations.
7. Donor- The individual making the donation who successfully completes and is qualified based on the requirements listed on the Online Donor Registration Form.
8. PM Customer- Subscribers who are Donors utilizing the PM Platform who successfully completed and are qualified based on the requirements listed on the Online Donor Registration Form.
9. Subscription-An agreement between the user of the PM Platform and PoliticalMeetings.com to provide a service monthly that automatically renews and is cancelable at any time.
10. Base Rate- The advertised rate to "get started" is currently at \$2.98 per month which includes a donation of \$1 to a political candidate who is eligible to receive donations through the PM Platform.
11. Subscription Rate- The amount charged in total monthly by PM to the Subscriber.
12. Basic Profile- A profile containing information about a candidate seeking elected office who we publish to the Platform with general information that is found on public websites such as a candidate's, Secretary of State, or the Federal Election Commission. General information such as the political office the candidate is seeking and the contact information for the campaign may be published.
13. Enhanced Candidate Profile- The profile of a Candidate only visible to Subscribers. Three added features differentiate the Enhanced Candidate Profile from the Basic Profile, and they are:
 - a. A link to donate.
 - b. A link to content such as fundraisers and special events.
 - c. A Dashboard where the campaign can track donations and run reports.
14. Private Agenda Access- access that Donors are provided by the Platform to meetings or events that are ordinarily not open to the public.
15. Candidate Campaign Committee-: the Candidate Campaign Committee is the legally formed entity by whatever name is deemed appropriate and approved according to law as it pertains to "campaign finance" in the jurisdiction where the candidate running for elected office resides.
16. Campaign Donation- The amount of funds donated to the candidate.
17. Campaign Finance- Rules and regulations by a governmental body as it relates to fundraising and how funds are handled in an election campaign.
18. Candidate's Authorized Committee Representative- A representative who is appointed to conduct business on the Candidate Campaign Committee's behalf.
19. Election Campaign- a time according to law that precedes an election when politicians try to persuade people to vote for them.
20. National Committee Donation- A National Committee of a Political Party recognized by the Federal Elections Commission.
21. Non-profit Org. Donation- The amount of funds donated to a Non-profit organization.
22. Services- The act of providing political meetings data electronically to Subscribers of the Platform.
23. Dashboard- Subscribers of PM are provided access to a private dashboard where they can see any names for candidates they support and are able to view records of donations made.
24. Campaign Dashboard- A candidate who receives donations on the Platform will have a dashboard to login at any time to download reports and view donation records.

PM Electronic Agreements:

Permission Slip

Electronic form (See Addendum "A") signed by an authorized party on behalf of the Donee who is a Candidate, Campaign Committee, Non-profit organization, or a National Committee of a Political Party granting permission to publish the 'private agenda' for the benefit of Subscribers. The Permission Slip will also request banking account or Pay Gateway details and permission to make automatic donation deposits into the appropriate designated bank account. Step-by-step instructions and information about the process involving donation funds shall be provided and contact information for any questions or concerns.

The Permission Slip will require an attestation by the election campaign that:

1. The campaign acknowledges it is the responsibility of the campaign to examine all contributions received for evidence of illegality and compliance with the FEC and any other applicable governing body.
2. When the election is over it will notify PM to remove its Enhanced Candidate Profile.

Online Subscription Registration Form- Form accessible on the PM Platform where a user enters into an agreement to subscribe for services. The Form shall comply with FEC regulations and include the disclaimer that contributions must comply with the federal limits and prohibitions and is not from a prohibited source. PM will require each Subscriber to confirm certain statements are true and accurate. See page 8 for the detailed list.

PM Online Donor Registration Form – The form that is automatically generated when a Subscriber on the PM Platform is donating to a candidate requiring answers to specific questions as required by law and then enabling prompts to choose party affiliation, the candidate campaign committee name, and an option to donate (currently \$0.50 cents) to a National Committee of a Political Party, and a choice of Non-Profit Organizations.

PM Access

Private Agenda Access- access that Donors are provided by the Platform to meetings or events that are ordinarily not open to the public and are by invitation specifically for donors of any eligible “Meeting Sponsor.” Eligible PM Meetings Sponsors are defined below and according to the PoliticalMeetings.com Terms and Conditions.

PM Meeting Sponsors

1. Candidate- A person who is running for elected office and appears on a candidate list released by the government elections agencies.
2. Campaign Committee- The political campaign committee designated by a candidate for Congress as the candidate's principal campaign committee for purposes of the Federal Election Campaign Act (2 U.S.C. § 432(e)).
3. Prospective Candidate- A declared candidate is someone who has not taken steps to become an official candidate.
4. Political Action Committee- An organization whose purpose is to solicit and make political contributions.
5. Political Committee- Any committee, club, association, or other group either formerly organized or not.
6. State Party Committee- A committee with an official party structure by virtue of the bylaws of a political party or by the operation of the state law who has at least one candidate for federal office whose name appears on the ballot as a candidate of the committee and that has an agreement with the political party to perform activities commensurate with the day-to-day operation of the party at the state level.
7. Non-profit organizations- An organization who has completed one IRS 990 form and is in active status.
8. Political based groups or clubs- A group of five or more individuals whose purpose is to discuss political topics and who operate within the bounds of the law of the respective local and state and the federal government.
9. Political Party Committee- Political Party Committees that are organized on the County, State or Federal level.
10. Registered Political Party- An organized group who is qualified according to state law in their state according to the Secretary of State’s office (or equivalent.)

Meetings

1. Political Meeting- political meeting means a meeting for the purpose of discussing the performance of the government, a local authority, or the program of any political party or for the purpose of supporting or opposing the candidature of any individual as against any other or others at an election.
2. Open Meeting or Public Meeting is a meeting at which the public may be present.
3. Kick-off meetings- The first meeting with the project team members.
4. Quarterly meetings- Meetings are held once every three months.
5. Fundraising Meeting- Meeting to discuss all aspects of fundraising.
6. Fundraising Events- An event created with the objective of raising donations for a political campaign or charitable cause.
7. Candidate Meet and Greet- An event especially orchestrated to introduce a political candidate to public citizens.
8. Precinct Meetings- Precinct caucuses are neighborhood-level meetings hosted by the Democratic and Republican Parties in advance of a Primary Election. The precinct is the smallest subdivision of the county.
9. Private Agenda- Meetings or events not otherwise open to the public.
10. Team Building- A meeting you call to build bonds or facilitate collaboration among team members.

The Payment Process

Only Subscribers have Private Agenda Access to those Enhanced Candidate Profiles on the PM Platform. Subscribers donate \$1 to at least (1) candidate when they subscribe at the current subscription rate of \$2.98 per month. An Administrative Fee of \$1.98 and one (1) Donation of \$1 (One USD) is included within the subscription rate of \$2.98 and subsequent donations are added. The Subscriber can donate up to (3) candidates without incurring another Administrative Fee of \$1.98.

Subscribers have access to the PM Database where they can search for meetings posted by “meetings sponsors” listed by candidate's name, state, entity name or ‘key word’ within the same party affiliation.

| Example: When subscriber gives to (3) three candidates. | | | | | | | | | | |
|---|-------------------|----------------|-----------------|--------------------|-----------|------------------|-----------|---------------------|---------------|--|
| Subscriber | NP or NC Donation | NP or NC Total | # of Candidates | Candidate DonTotal | Admin Fee | Total Admin Fees | Sub Total | Pay Gateway Fee | Total Charged | |
| Jane | 0 | | 3 | \$3 | \$1.98 | \$1.98 | \$4.98 | 0.44 | \$5.42 | |
| Example: The only time PM pays the Pay Gateway Fee is when the subscriber is donating to just one candidate. | | | | | | | | | | |
| Joe | 0 | | 1 | \$1 | \$1.98 | \$1.98 | \$2.98 | Waived (paid by PM) | \$2.98 | |
| Example: The Subscriber is charged \$1.98 Administrative Fee for every three donations to cover administrative costs at PM. | | | | | | | | | | |
| Bob | 0 | | 50 | \$50 | \$1.98 | \$33.00 | \$83.00 | \$2.71 | \$85.71 | |
| Example: Subscriber donating to more than three candidates incurring additional administrative fee. | | | | | | | | | | |
| Candy | 0 | | 4 | \$4 | \$1.98 | 3.96 | \$7.96 | \$0.53 | \$8.49 | |
| Example: Subscriber donating to candidates and a Non-profit organization. | | | | | | | | | | |
| Joe | 1 | .50 cents | 1 | \$1 | \$1.98 | \$1.98 | \$3.48 | Waived (paid by PM) | \$3.48 | |
| Barry | 2 | \$1 | 5 | \$5 | \$1.98 | \$3.96 | \$9.96 | \$0.59 | \$10.55 | |
| *Pay Gateway Fees are subject to change. For the purposes of this example, they are 2.9%+.30 cents. The examples above do not include taxes. | | | | | | | | | | |
| * NP or NC Donation- The donation given to a Non-profit org. or a National Committee of a Political Party as recognized by the FEC. | | | | | | | | | | |
| *Pay Gateway Fees are waived for the Subscriber and paid by PM up to an amount of \$3.48 which allows the Subscriber to donate to one (1) one candidate and (1) one Non-profit org. or National Committee without their having to pay any Pay Gateway Fees. | | | | | | | | | | |

Subscribers may donate to as many candidates as they want. PM will monitor for suspicious activity and will act based on any situation that may arise according to law. The Subscriber does not incur additional fees from PM if they do not donate to more than three candidates and a choice of one non-profit organization or National Committee of a Political Party as recognized by the Federal Elections Commission. Please note the figure above demonstrates how when the number of candidates supported increases to over three candidates, the subscription rate increases. The Subscriber pays for Pay Gateway fees on any subscription that is more than \$3.48 excluding taxes. Pay Gateway fees are determined by the entity providing the payment processing service. PM may switch to ACH services provided directly through a major bank such as Wells Fargo in the future if rates are more affordable and the speed with which transactions occur are more prompt. Current Pay Gateway fees are 2.9% + .30 cents per transaction. PM will not profit by adding any amount to a Pay Gateway fee. Subscribers will only pay the cost associated with the transaction according to the terms. Subscribers may cancel at any time by contacting the office by email, telephone, or electronic form; however, it is recommended that the Subscriber cancel by email or electronic form so that the cancellation is in writing. Visitors on the Platform have access to free information including the basic profiles of political candidates, news, nonprofit listings, or other information. Visitors are not Subscribers and are not required to complete a Subscription Registration Form and have limited access.

BANK CASH FLOW:

Below is an explanation of how the bank accounts will function. Funds for Candidates, Non-profits, or a National Committee are all automatically diverted to the account holders for the respective entities upon payment by the Subscriber/Donor.

Bank Account #1 - PM Subscription Account-Gross Subscription Fees minus donations

Bank Account #2 - PM Operating Account-Once the Subscriptions Account is reconciled, funds are transferred here for company use.

Contribution and Payment Processing for PM:

The donation of \$1 is paid directly through the Platform utilizing a Pay Gateway such as Stripe. PM may in the future utilize Straight Through Processing technology which would allow funds to flow straight through to the appropriate bank account while avoiding the use of a third party such as a Pay Gateway. In any case, the donation is split so that PM's bank account does not receive donor funds as the donations are directly deposited into the designated Candidate Campaign Committee, (Donee) bank account. The remaining \$1.98 is directed to the PM.com Subscription Account. Should the Subscriber/Donor opt to donate \$0.50 cents to a National Committee of a Political Party or a Non-profit charity, the funds donated will be directed straight into the respective entity's bank account through the Platform. Should there be an issue with compatibility of systems that causes problems with a valid automatic funds transfer, funds shall be released to the donee within two (2) business days by electronic wire. The Candidate Campaign Committees, Non-profits, and National Committee shall have real-time access to all activity including donations, errors or returns so that all matter of record is made visible and can be audited at any time.

The funds paid to PM cover the cost of doing business to include data research, payroll, accounting, legal, office and other expenses arising in the normal course of work on a day-to-day basis. Currently, PM uses Stripe Pay Gateway for transaction processing.

We do not accept donations on behalf of candidates. Should an error occur where funds were inadvertently deposited into PM bank account, the error would be corrected, and the funds returned to the Donor or the Donee within two (2) business days. The Donor or the Donee would be notified of the error and provided any instructions necessary to remedy the situation.

The Donee is not a client or customer of PM.

Without the permission of the Donee, PM cannot provide a method to donate directly through the PM platform. If PM receives an enquiry from a Visitor or Subscriber who wants to donate to a candidate, PM will contact the Candidate Campaign Committee. If the Candidate Campaign Committee agrees to participate, PM will email instructions on how to complete the Permission Slip allowing PM to proceed with the process as described.

Example Situation PM

A Visitor to the PM Platform realizes that although they can learn about publicly held meetings, they do not have access to private information and cannot donate to one of their favorite candidates. A Visitor contacts our office to find out how to donate to their favorite Candidate. PM has a Basic Profile on the Candidate which was set up as a matter of regular process and was visible to Visitors and other Subscriber/donors. After the Visitor contacted the office, administrative personnel called the candidate's campaign to advise that a Visitor to the PM Platform would like to utilize the platform while donating to the campaign. The election campaign's designated representative follows through by completing a Permission Slip granting PM permission to publish specified meetings that will be provided to Subscribers of PM who are Donors to the Candidate or Campaign Committees. The Visitor is then directed to register for access by completing the Online Subscription and Donor Registration Forms. If the Subscriber answers a question which causes them to be ineligible as a donor, the platform will not allow him to proceed, and will state the reason for the error and refer the Subscriber to a customer service telephone number and email address.

Upon completing the Online Subscription and Donor Registration Forms, the Subscriber will be able to login and will be instructed to create a unique password. Our Platform will utilize HTTPS which is the most secure way to transmit subscriber credentials since the subscriber's credentials are encrypted before being sent. If Subscriber checks a box and answer any questions on the electronic form which causes them to be ineligible to donate according to the Federal Election Campaign Act, the system will not allow Subscriber to proceed. Should a Subscriber show inappropriate behavior or actions, we may catch an impropriety at some point and if we do, we will immediately disable the account, notify the (would-be) Subscriber, and notify the campaign.

The Subscriber must complete the Online Subscription and Donor Registration and Forms and acknowledgment that \$1 per month will automatically route to Candidate's campaign as a contribution to the campaign each month the transaction is completed successfully. The Subscriber completes the transaction for \$2.98 or the amount which corresponds with the number of candidates supported and any added donation to a Non-profit, a National Committee of a Political Party. The subscription will automatically renew monthly. The Subscriber understands that they can cancel at any time. PM will cover any Pay Gateway fees for charges that do not exceed \$3.48 excluding taxes (Three Dollars and 48/100s,) and these will not be passed on to Subscriber. Subscriber is the "Customer" and the funds that Subscriber pays excluding the donation are specifically for the meetings data and overhead of PM that Subscriber utilizes.

Candidate's Authorized Committee Representative Perspective:

Before the Visitor can donate to an Election Campaign or learn about and other meetings that otherwise may have been deemed exclusive for donors of the campaign through the PM Platform, the Candidate must upgrade the Basic Profile to an Enhanced Candidate Profile by completing a Permission Slip. The only difference between a Basic Profile and Enhanced Profile is that the Candidate is voluntarily providing the data necessary for the PM Platform to facilitate donations to its campaign on behalf of our subscribers and by doing so commits to providing by email on a regular basis a list of special events that are only for donors to the campaign.

The PM Database will make those meetings and invitations available exclusively to those who donate to the respective candidates that have the Enhanced Profile. Administrative personnel with PM emails or provides instructions via telephone to the Candidate Campaign Committee where to locate the on-line Permission Slip. Upon completion of the Permission Slip, the Prospective Candidate is converted to an Enhanced Candidate Profile and will be provided instructions on setting up the Pay gateway or other system used to facilitate donations, instructions on how to access the dashboard, a commitment to cooperate and other general terms and conditions. There is no cost to the Candidate.

- Candidates can invite voters to participate with PM's Platform and can share their profile.
- Candidate does not have any control over the information on the campaign's page and would be required to complete a form or email PM with any information it would like published or information on meetings or fundraisers.
- Candidates would be able to share a link to its website which would likely have a donation button. This is not a problem for PM since we have already earned our fee from the user.
- Any person who wants to donate to the Candidate may do subject to government law and FEC Regulations.

Platform Security Measures

We require location monitoring and do not allow access on our mobile App from outside of the United States to unknown new visitors. A visitor to the Platform within the United States who successfully subscribes to the Platform becomes a Subscriber and will have access outside of the United States by utilizing their account login credentials. Those who attempt accessing the site as a visitor outside of the United States will not have access. We would be monitoring the Platform on the website and mobile App daily and would most often be alerted to any cause for concern which would be reported to the appropriate authorities for appropriate action.

Online Subscription and Donor Registration Form disclosures:

- Federal Election Campaign Act requires candidates and other political committees to use best efforts to report that information for contributions aggregating over \$200 in a calendar year from the contributor to that candidate, and that the information, once reported is made public on the Commission's website.
- Each contribution made through PM must be aggregated with all other contributions made by the User to that candidate and that aggregate must be less than (legal contribution rate) per election.

PM will verify the legal contribution limits per cycle and office held when applicable. We realize that this is an important record keeping aspect to comply with Federal, State and any local regulations.

PM Online Donor Registration Form has required attestation by the Subscriber that they are providing the following information and that it is true and accurate:

1. Legal name
2. Mailing address
3. Occupation and Employer
4. Whether or not they are a federal contractor
5. Attest whether they are a US citizen or legal permanent resident
6. That they are using their own personal funds to make the contribution and not using funds given to them by another person for the purpose of contribution
7. That they are using their own credit card and not a corporate or business card, or a card issued to another person
8. That they are over the age of 18 and they are not a minor
9. That the contribution is not being made at the request or direction of another individual

Preview
✕

PERMISSION SLIP *

NAME DONEE

ENTITY RECEIVING DONATIONS - PLEASE SEE PMS PRIVACY POLICY AND TERMS OF SERVICE FOR DEFINITIONS OF TERMS ON THE WEBSITE POLITICALMEETINGS.COM.

TELEPHONE NUMBER *

TELEPHONE NUMBER *

E-MAIL *

E-MAIL *

DONEE ADDRESS *

CITY *

STATE, ZIP CODE *

ENTITY ADDRESS *

CITY *

STATE AND ZIP COI

BANKING INSTRUCTIONS *

PM requires that the Donee utilize the Pay Gateway "Stripe." Please contact the office at E-mail business@politicalmeetings.com for step-by-step instructions including the use of a special "link" provided by Stripe that will properly link the bank accounts.

ACCEPTANCE OF AUTOMATIC DONATION DEPOSITS.

PRIMARY ATTESTATION *

The Donee agrees to provide meetings or event invitations that are not available to the general public to our Subscribers who donate.

"PRIVATE AGENDAS" FOR SUBSCRIBERS OF PM

DONEE ATTESTATION 1 *

The Donee agrees that when the election is over it will notify PM to remove its Enhanced Candidate Profile.

REMOVAL OF ENHANCED CANDIDATE PROFILE

DONEE ATTESTATION 2 *

Donee accepts responsibility to examine all contributions received for evidence of illegality and compliance with the FEC and any other applicable governing body.

LEGAL COMPLIANCE

CONSENT *

Yes, I agree with the [privacy policy and terms and conditions](#).

SEND