



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 22, 2002.

Richard F. Carrott
Careau & Co.
14183 Maya Circle
Moorpark, CA 93021-3552

Re: AOR 2001-20

Dear Mr. Carrott:

This refers to your letter by e-mail dated January 22, 2002 requesting that your advisory opinion request submitted on October 17, 2001 be withdrawn. This request posed the question of Internet-based political fundraising by Internet Service Provider under agreements with Federal committees..

This will confirm that we consider AOR 2001-20 as withdrawn and are closing our files on the matter.

Sincerely,

A handwritten signature in black ink, appearing to be "N. Bradley Litchfield", written over a horizontal line.

N. Bradley Litchfield
Associate General Counsel



Phone: (805) 553-0150
www.careau.com

Copy Sent Via E-Mail

22 January 2002

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Withdrawal of
AOR 2001-20

Re: Rescission of AOR 2001-20

Dear Mr. Norton:

On 17 October 2001, Careau & Co. filed an Advisory Opinion Request with the Federal Election Commission seeking approval of a proposed business program for the solicitation, distribution, and accounting of federal account contributions by credit card over the Internet. Among other things, the request asked the Commission to confirm that the proposed program involved: 1) direct contributions to federal committees earmarked and controlled by an individual as permitted by law; and, 2) contributions that the contributor has affirmed are from personal funds and not funds otherwise prohibited by law.

On 17 January 2001, we received a copy of the Draft Advisory Opinion related to our request. The draft concludes that the cost of the contributions is borne by the corporations and that the contributions are, therefore, by Careau and Mohre. This is, obviously, at odds with our objective to recognize the individual contributor's control over the funds disbursed directly from his/her credit card to the campaign committee.

We have determined, therefore, that our best approach may be to revise our request and resubmit it.

Mr. Norton
22, January 2002

Careau & Co.

Page 2

Based upon the forgoing, we are withdrawing AOR 2001-20 without prejudice to resubmitting a new request in the future.

Thank you.

Respectfully,

Richard F. Carrott
Chrm. and C.E.O.

Theodore G. Johnsen
E.V.P. and C.O.O.

02.01.22 Recission LETTER to FEC