

**CAMPAIGN FINANCE INSTITUTE
CENTER FOR RESPONSIVE POLITICS
COMMON CAUSE
DEMOCRACY 21
LEAGUE OF WOMEN VOTERS OF THE UNITED STATES
PUBLIC CITIZEN
SUNLIGHT FOUNDATION
U.S. PIRG**

June 25, 2008

Senator John McCain
John McCain 2008
P.O. Box 16118
Arlington, VA 22215

Dear Senator McCain:

With the candidates' campaign finance reports for May, the cost of the 2008 presidential election surpassed \$1 billion—a first in U.S. history. The record-breaking amount of private money that is being raised, even with the public financing that you plan to use for your general election campaign, underscores the need for transparency in your fundraising operation, particularly as it concerns “bundlers” who raise money for you in amounts far exceeding what they are permitted to contribute personally to your campaign. As organizations that pay close attention to the financing of U.S. elections, we believe the public is also interested in, and entitled to know, more about the smaller donors who are supporting you, since these donors would appear to be more active than in past elections.

Our organizations have been pleased that you have gone beyond the current requirements of campaign finance law and shared the names of your top fundraisers with the public. Your general election opponent, Senator Obama, has provided similar information. In a few cases you have also indicated which “tier” each of your bundlers falls into—“Trailblazers” who have raised at least \$100,000 and “Innovators” who have collected \$250,000 or more—but this disclosure has been spotty.

While the public benefits from knowing bundlers' names and where they roughly fit into the hierarchy of a campaign's financial supporters, it would be far more meaningful for the public to know a single dollar figure that represents precisely and cumulatively how much money the campaign attributes to each individual who has bundled contributions of at least \$50,000. The total credited to an individual bundler by the campaign should include the total amount the bundler has raised for your official campaign committee since its launch plus the total raised for any joint fundraising committee that benefits your campaign. We also ask you to instruct the Republican National Committee to keep track of its bundlers and disclose the same information.

Our organizations request that you begin to disclose this information, which we believe the public is entitled to know, concurrent with your next report to the Federal Election Commission—calculating bundlers' fundraising from the beginning of your campaign through June 2008—and that you update and add to this information with every FEC filing through the conclusion of this election cycle.

We also request that you expand the details released about your bundlers to include their city and state, employer and occupation. Such disclosure would not exceed what the Federal Election Commission requires for donors who contribute more than \$200. Furthermore, we request that all this information be made available to the public on your campaign's Web site.

We also think the public would be interested in learning more about your smaller donors, especially since Senator Obama has cited his campaign's reliance on small donors in justifying his decision to opt out of the public funding system. We observe that as of May 31, 24 percent of your money has come from donations of \$200 and under. We do not expect you to disclose the same information about your smaller donors that the FEC requires for larger contributors, but concurrent with your July FEC report and updated with every report until the election cycle's conclusion, we request that you provide a breakdown of the number of these smaller contributors by ZIP code and foreign country (since Americans living abroad may contribute), along with the cumulative amount of money you have received during this campaign from small donors in each ZIP code and country. This information will provide the public with more comprehensive insight into the demographics of your donors.

We recognize that our organizations are asking you to share information that presidential candidates have not provided in the past. But, to borrow a phrase, for those to whom much private money has been contributed, much is required. We are seeking the same information from Senator Obama, particularly in light of his recent announcement that he will continue raising private money through the general election.

You and Senator Obama are both leaders in your respective parties and in American politics, and we hope you will lead by example and agree to the transparency measures we have outlined. We look forward to your response, and to seeing you take these important steps.

Sincerely yours,

Michael J. Malbin, Executive Director
Campaign Finance Institute

Sheila Krumholz, Executive Director
Center for Responsive Politics

Bob Edgar, President

Common Cause

Fred Wertheimer, President
Democracy 21

Mary G. Wilson, President
League of Women Voters of the United States

Joan Claybrook, President
Public Citizen

David Arkush, Director
Public Citizen's Congress Watch Division

Ellen Miller, Executive Director
Sunlight Foundation

Gary Kalman, Director of Federal Legislative Office
U.S. PIRG