2242 Wheelwright Court  
Reston, VA 20191-2330  
October 21, 2016  

The Honorable City Council Chairperson Amy Foster and  
The Honorable City Council  
St. Petersburg, Florida  

Dear Chairperson Foster and Members of the Council:  

I understand that you are considering an ordinance that would limit contributions to Super PACs spending on city elections. I am writing to bring to your attention a relevant new study I have just completed of top individual and organizational donors to Super PACs and independent groups in federal elections.  

First let me introduce myself. I am an independent political scientist specializing in American Government who has taught at Fordham University, the University of Texas at Dallas and Howard University. I have been both studying and working for reforms in the federal campaign finance system since 1998. From 1998-2002, I was Legislative Representative for Public Citizen – a nonpartisan national citizens group – where I concentrated on campaign finance reform legislation. From 2002-09 I was Associate Director for Policy at the Campaign Finance Institute, a nonpartisan research institution with a broad audience among federal, state and local policy makers as well as scholars.  

In both of these jobs, and subsequently, I have published reports, articles and book chapters on campaign finance issues. One of my principal interests has been the explosion of independent group spending in elections, including 527, 501 (c) (4), 501 (c) (5) and 501 (c) (6) groups and, most recently, Super PACs. Among my publications on this subject are: “BCRA and the 527 Groups,” in Michael Malbin ed., The Election After Reform (Lanham, MD: Rowman and Littlefield, 2006), 79-111 (with Ruth Hassan), “Nonprofit Interest Groups’ Election Activities and Federal Campaign Policy,” The Exempt Organization Tax Review (October 2006), 21-38 (with Kara Ryan), “Soft Money in the 2006 Election and the Outlook for 2008: The Changing Nonprofits Landscape,” Campaign Finance Institute 2007 and “Robert Menendez and the Dangers of Unlimited Campaign Contributions,” Los Angeles Times, April 7, 2015.  

My new study, “The Speech Now Case and The Real World of Campaign Finance,” is attached. It was undertaken at my initiative and has just been published by Free Speech for People which offered modest support only for purchasing the data from the respected Center for Responsive Politics. The study shows that the great majority of the top 100 individual and 50 organizational donors to Super PACs and other independent groups supporting federal candidates in the 2012 and 2014 election cycles simultaneously gave large direct campaign contributions to the very same candidates. So while the Super PACs themselves maintained a distance from their preferred candidates, their donors did not. I conclude that when large donors amplify their legally limited direct contributions to candidates with unlimited indirect support to the same
candidates via Super PACs and other independent groups, they are intensifying the danger of *quid pro quo* corruption that contribution limits were established to prevent.

I hope this study is useful to you. Please do not hesitate to contact me if you have any questions about it or I can be of further assistance.

Sincerely,

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