

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

March 12, 2012

The Honorable Rick Santorum  
Rick Santorum for President  
P.O. Box 37  
Verona PA 15147

Dear Mr. Santorum:

Because spending in the 2012 presidential campaign is very likely to eclipse all previous records, our organizations believe the public's interest in learning the identities and roles of the candidates' major fundraisers is more urgent this election cycle than ever before.

Using "bundlers" to aggregate large numbers of contributions was used to great effect as a campaign fundraising tool in the 2000 presidential election. Then-Gov. George W. Bush set a precedent during that campaign of disclosing bundlers, dubbed "Pioneers," who raised at least \$100,000 on his behalf. The successive presidential nominees of both the Republican and Democratic parties have likewise disclosed their major bundlers in subsequent presidential elections as have several candidates who did not win their party's nomination.

We are writing to you today to ask that you adopt the same policy of disclosing the relevant details about your major fundraisers.

While President Bush (in 2000 and 2004), Sen. John Kerry (in 2004), Sen. John McCain (in 2008) and President Obama (in 2008 and so far in 2012) have each disclosed ranges or minimums raised by their bundlers, we believe it is in the public's interest for the presidential candidates to adopt more specific disclosure policies this cycle.

Despite the fact that the Honest Leadership and Open Government Act of 2007 has created a bundling disclosure requirement, it mandates that only bundlers who are registered lobbyists be disclosed, and even this requirement can be easily evaded because of the

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manner in which the Federal Election Commission (FEC) has implemented the law. As a result, it is again entirely up to the voluntary disclosures of each presidential candidate to provide a true and accurate picture of the roles and identities of bundlers for their 2012 campaigns.

Specifically, we recommend that you agree to:

- Disclose precise dollar figures of how much money your 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 committee or other affiliated entity that supports your campaign. If you succeed in winning your party's nomination, we ask that you also include amounts raised for the party in your subsequent disclosed totals.
- Include the mailing address, employer and occupation of each bundler. Such disclosure would not exceed what the Federal Election Commission currently 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 website in a format that can be downloaded, searched and sorted.

Our organizations request that you begin to disclose this information, which 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 the latest period covered by reports filed with the FEC—and that you update these bundling records simultaneous with every FEC filing through the conclusion of your candidacy. If you become the nominee, we'd request that you also provide final bundler data when you file your year-end report with the FEC.

We recognize that our organizations are asking you to share more information than the law requires of presidential candidates. But it's not more than the American public deserves to know.

Sincerely yours,

Michael J. Malbin, Executive Director  
Campaign Finance Institute

J. Gerald Hebert, Executive Director  
Campaign Legal Center

Sheila Krumholz, Executive Director  
Center for Responsive Politics

Bob Edgar, President  
Common Cause

Fred Wertheimer, President  
Democracy 21

Elisabeth MacNamara, President  
League of Women Voters of the United States

David Arkush, Director  
Public Citizen's Congress Watch Division

Ellen Miller, Executive Director  
Sunlight Foundation

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