

Also in subsection (b)(1)(i) of this section, the defined term "campaign finance entit[ies]" is substituted for the former references to "candidate or political committee" for clarity. *See* General Revisor's Note to this title and § 1-101 of this article.

In subsection (b)(1)(ii) of this section, the phrase "to all campaign finance entities" is added for clarity.

In subsection (d)(1) of this section, the reference to the limit on "in-kind" contributions that a State or local central committee may make during an election cycle is added for clarity and for consistency with the advice rendered by the Office of the Attorney General. *See* Letter of Advice dated June 22, 1998, to Rebecca Wicklund, Director of Candidacy and Campaign Finance, State Administrative Board of Election Laws, Annapolis, Maryland from Kathleen Hoke Dachille, Assistant Attorney General.

Also in subsection (d)(1) of this section, the reference to "[n]otwithstanding subsection (b) of this section" is substituted for the former reference to "any other provision of this article" for clarity.

The Election Law Article Review Committee notes, for the consideration of the General Assembly, that this section has been revised so that the substantive provisions apply to the State central committee and the local central committee of a political party. The Committee presumes that this is the intent of the General Assembly. Thus, in subsection (d)(1)(ii) of this section, the former reference to a "governing body" of a local central committee is deleted as surplusage since the governing body for a local central committee is the local central committee.

In subsection (d)(2) of this section, the reference to "the first day of the election cycle" is substituted for the former references to "January 1 following the preceding gubernatorial election" in light of the defined term "election cycle".

In subsection (f) of this section, the former phrase "for the purpose of determining the maximum amount that a corporation may contribute" is deleted as surplusage.

The Election Law Article Review Committee notes, for consideration by the General Assembly, that it is the long-standing view of the Office of the Attorney General that a donation of money or any other valuable thing to [the political committee of] a political party for maintaining the political party's normal headquarters office and staff is not chargeable against the donor's contribution limits under this section. *See, e.g.,* 60 *Opinions of the Attorney General* 259 (1975); letter dated July 23, 1991, from Elizabeth L. Nilson, Counsel to the State Administrative Board of Election Laws, to the Honorable Robert L. Flanagan; and memorandum dated October 17, 1990, from Joseph Sandler, General Counsel, Maryland Democratic Party. The Election Law Article Review Committee does not intend for the revision of former Art. 33, § 13-212 to affect these former interpretations.