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FEDERAL ELECTION
COMMISSION
SECRETARIAT

COORDINATING COMMITTEE FOR THE GREENS/GREEN PARTY USA
NATIONAL COMMITTEE GOVERNING BODY OF THE "GREEN PARTY"
GREENS/GREEN PARTY USA

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National Office: 226 South Wabash, 6th floor, Chicago, IL 60604

September 7th, 2001

FEC Office of General Counsel
999 E Street NW
Washington, DC 20463

RE: AOR 2001-13

Comment to
AOR 2001-13

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear FEC Commissioner:

To begin with, we wish to notify you that our mailing address was omitted from our previous letter because our clearinghouse recently moved from Massachusetts to Chicago. The new mailing address of our national office is: PO Box 1406, Chicago, IL 60690. However, please continue to send communications to Maris Abelson (at 80 La Salle St. #11A New York, NY 10027), for she has been charged with contacting the FEC.

To clarify and expand on our previous letter, we wish to make you aware of some misrepresentations in AOR 2001-13:

In their filing to the FEC, the Green Party of the United States (GPofUS) included a section entitled "Partial History of Green Party Candidates in the United States". We wish to point out that some of these candidates were not affiliated with GPofUS. For example, candidates for the State of Missouri are included in the list but the Missouri Green Party is not affiliated with GPofUS. The Green Party of Nevada is not affiliated with GPofUS; it is an independent State Green Party. Likewise, the Green Party of Washington is an independent State Green Party, and is not associated with GPofUS.

We would also like to note, for the purpose of clarification, that many of the State Green parties are also affiliated (some are only affiliated) with our organization (The Greens/Green Party of the United States of America).

In addition, GPofUS claims that among others, the States of Missouri, Louisiana and Illinois did not have formal State parties by early 2000. This is incorrect. The three above States did have formal parties at that time.

Finally, AOR 2001-13 asserts that in the year 2000, Ralph Nader was the candidate of the ASGP. They state in section I., entitled "The History of the Association of State Green Parties (ASGP) and Evolution of the Green Party of the United States)" the following:

"In 2000, the Association of State Green Parties (ASGP) hosted a Presidential Nominating Convention in Denver, Colorado to formally nominate Ralph Nader and Winona LaDuke as the Green Party's official presidential and vice presidential candidates."

The 2000 nominating convention was attended by many Green organizations, including delegates from the Greens/Green Party USA, and these various organizations and delegates voted in the convention. Furthermore, only some of the forty-four State Green Parties who obtained ballot access for the candidates were affiliated with ASGP at that time. Those not affiliated include the Green parties of Alaska, Kentucky, Nevada, and Washington.

We are also perplexed to see that candidates are included in the filing who ran their campaigns before GPofUS was formed in August of 2001.

There are some affidavits in the filing, signed by candidates who claim they support the filing of GPofUS. We do not dispute the wishes of the signers; however we note that all of them except that of Howie Hawkins (whose affidavit is dated November 7th, 2001,) predate the creation of GPofUS and the publication of its bylaws.

Our second set of concerns address the use of the name "Green Party" in AOR 2001-13, which is used in a manner that makes it appear to be singly representing the "Green Party of the United States" (GPofUS). We cite the following enumerated instances:

1. The cover page of the advisory opinion request submitted by GPofUS states the following: "Seeking Recognition of the Coordinating Committee of the Green Party of the United States As the National Committee of the Green Party".

2. In the letter submitted by Thomas Alan Linzey, Esq. and David Cobb, Esq, there is a request that the coordinating committee of GPofUS be recognized as "National Committee of the Green Party".

3. In the section of AOR 2001-13 entitled "A Short History of the Association of State Green Parties", the following is stated: "The ASGP-with affiliations now in the mid-thirties-now prepares to shift from being a federation of state parties to being the national Green Party, in conjunction with the expected recognition by the Federal Election Commission as the national committee of the Green Party".

We object to the manner in which AOR 2001-13 utilizes the term "Green Party" for as you can see above, it gives the impression that GPofUS is the pre-existing and the sole national Green Party, which it is not. The Greens/Green Party USA was recognized as a national party by the FEC in 1996, and in that opinion (AO 1996-35), the Commission concluded that "the Green Party would be a political party for the purposes of the Act." We do not object to there being more than one Green Party but we do hold issue with the self-referential language in AOR 2001-13 that would make it appear that GPofUS was and is the ONLY Green Party.

For the purposes of clarification vis a vis our previous letter, we wish to add that although we do not object to any other political party filing for recognition as a national party or for national committee status, we view the name "Green Party of the United States" to be too similar to "Green Party USA". We are aware that there are many Socialist parties but their names are distinct and they are distinguishable from each other. We thank you for examining our concerns and we look forward to hearing from you on these matters.

Cordially,



Maris Abelson
Nancy Oden
Lisa Thurman (alternate)

Coordinating Committee for the
Greens/Green Party USA
National Committee
Governing Body of the
"Green Party", Greens/Green Party USA