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March 13, 2015

Mr. Bradley Matheson
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Independent Insurance Agents & Brokers of America, Inc. (C90015249) Year-End Report (10/01/2014 - 12/31/2014)

Dear Mr. Matheson:

This letter is submitted on behalf of the Independent Insurance Agents & Brokers of America, Inc. ("IIABA") in response to your February 19, 2015 request for additional information regarding IIABA's 2014 Year-End Report for independent expenditures.

Your letter cites two regulations: 11 C.F.R. ? 109.10(e)(1)(vi) (disclosure of certain donors) and 11 C.F.R. ? 114.10(f) (requiring "qualified nonprofit corporations" to inform donors that donations may be used for political purposes).

114.10(f): This regulation applies only to qualified nonprofit corporations, which is a specially-defined term in the regulations. IIABA is not a "qualified nonprofit corporation." As such, it was not required to provide the notice specified in the regulation to contributors. Given that this is a notice requirement, it is not clear as to why it forms the basis for a reporting RFAI. Moreover, that regulation was eliminated in the final revised regulations governing independent expenditures by corporations published by the Commission on October 21, 2014, effective January 27, 2015. See 79 Fed. Reg. 62797, 62819 (Oct. 21, 2014); 80 Fed. Reg. 12079 (March 6, 2014).

109.10(e)(1)(vi): This regulation requires disclosure of each person who makes contributions of over \$200 if the contribution was "made for the purpose of furthering the reported independent expenditure[s]." IIABA did not solicit, accept, or otherwise receive any contributions from donors "made for the purpose of furthering the reported independent expenditure[s]." See MUR 6002 (Freedom's Watch, Inc.), Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Donald F. McGahn, at 5 ("In other words, a donation must be itemized on a non-political committee's independent expenditure report only if such donation is made for the purpose of paying for the communication that is the subject of the report."). IIABA used its general treasury funds to make the independent expenditures; it did not make special solicitations to raise funds for the independent expenditures.

Accordingly, no contributions were required to be disclosed on IIABA's report pursuant to the regulations cited in your request.

Please feel free to contact me if you have any further questions.

Sincerely,

Joseph Doherty
Counsel
Independent Insurance Agents & Brokers of America, Inc.