

Law Offices of

OLSON

HAGEL &

FISHBURN

LLP

April 3, 2017

Jessica Grainger, Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Opportunity PAC (C90016841) – Year-End Report (10/01/2016 – 12/31/2016)

Dear Ms. Grainger:

Our firm serves as counsel to the above referenced committee and is in receipt of your letter dated March 15, 2017 regarding the FEC Form 5 covering the period 10/1/16 – 12/31/16.

Your letter requests additional information regarding any contributors who made contributions in excess of \$200 to further the independent expenditures disclosed on the report. Federal regulations require an entity filing an FEC Form 5 to identify each person who made a contribution in excess of \$200 to the entity filing the report if the contribution “was made for the purpose of furthering the reported independent expenditure.” (11 CFR 109.10(e)(1)(vi).) Opportunity PAC did not receive any contributions in excess of \$200 for the purpose of making the reported independent expenditures. As a result, our year end filing is accurate.

Lending some confusion to the matter may be the instructions for the FEC Form 5 which indicate that Line 6 of the Form should include “total contributions,” “including contributions of \$200 or less that were not itemized on Schedule 5-A.” However, Regulation 109.10(b) specifies that entities filing the Form 5 must include the “information required by paragraph (e) of this section.” As paragraph (e) only requires the itemization of contributors giving \$200 or more in furtherance of the reported independent expenditures, and Opportunity PAC had no such contributors, there is no reportable amount to be disclosed on Line 6 of the Form in this instance.

We trust this addresses your inquiry, but should you need any further information, please do not hesitate to contact me or Erika Boyd in my office.

Very truly yours,

OLSON HAGEL & FISHBURN LLP



RICHARD R. RIOS

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2017-04-06-08:14:00 AM

FORM 99 - MISCELLANEOUS TEXT

1. NAME OF COMMITTEE IN FULL	Opportunity PAC - A Coalition of teachers, health care givers, faculty members, school employees, and public and pr:
ADDRESS (number and street)	555 Capitol Mall, Suite 1425
CITY, STATE, AND ZIP CODE	Sacramento , CA 95814
2. FEC ID NUMBER	C90016841
3. MISCELLANEOUS TEXT	

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Very truly yours,
 OLSON HAGEL & FISHBURN LLP
 RICHARD R. RIOS

SIGNATURE	DATE	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100
	04/03/2017	

FEC FORM 99
(Revised 1/2001)

2017-04-06 09:00:00 AM 00146666

Federal Election Commission
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4/3/17

PREPARER  **4/6/17**
DATE PREPARED

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