

November 2, 2007

Ms. Jodi Winship
Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Request for Additional Information (Mid-Year Report, 1/01 - 6/30/2007)

Dear Ms. Winship:

This is in response to the Federal Election Commission's analysis of Freedom's Defense Fund's Mid-Year 2007 FEC Disclosure Report and your request for additional information concerning that report.

The beginning cash balance will be adjusted on the amended report to agree with the closing balance on the previous report.

The payments disclosed on Schedule B as "List Rentals" is a common expenditure for committee's engaged in direct mail fundraising. The committee must rent lists to prospect for new donors; it rents these lists from other groups through our list broker, Legacy List Marketing, Inc. (formerly BMW Lists, Inc.). The rates charged by List Brokers are standard in the industry and the lists were used solely for the purpose of raising funds for Freedom's Defense Fund.

The committee's Disclosure Report disclosed limited payments for administrative expenses. Freedom's Defense Fund has no paid staff and an office is not maintained by the committee; this is a volunteer operation, with the purpose of giving all net proceeds to candidates. All expenditures related to the committee have been fully disclosed.

The RFAI referred to the fact that donors were reported who lacked employer and occupation information. The majority of the contributions received are a result of direct mail solicitations and despite the fact that each appeal includes a clear and conspicuous request for the contributor information as well as occupation and employer; some of the donors do not provide the requested information. The committee makes a point of obtaining the missing information and amends its reports after the fact.

Best Efforts Procedures: Within thirty (30) days of receipt of a contribution, the committee takes the following steps to satisfy the 'best efforts' requirements: (i) a letter is sent, clearly asking for the missing information, without soliciting a contribution; (ii) the contributor is informed of the requirements of federal law for the reporting of such information; and (iii) a return envelope is provided, as well as a fax number and an email address. Upon receipt of the information the committee amends its reports to provide the newly obtained information.

The Year-End 2006 Disclosure Report lists a debt on Schedule D of \$26,303.90 owed to BMW Lists, Inc. and on the Mid-Year 2007 Report; the opening balance of that debt is listed as being owed to Legacy List Management, Inc. At the start of 2007, BMW Lists, Inc. changed its name, therefore the discrepancy in names.

I trust that this response will satisfy the Commissions request for additional information. Please contact me should you require anything further.

Sincerely,

Scott B. Mackenzie, Treasurer
