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This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RAI") dated November 8, 2012, requesting that Americans for Job Security ("AJS") amend its October Quarterly Report to include information about its contributors.

The language used in the RAI regarding the requirements of 11 C.F.R. 109.10(e)(1)(vi) misstates that regulation. The RAI asserts that itemization is required for "each contributor who made a donation in excess of \$200 used to fund the independent expenditure(s)." The cited regulation, however, requires the reporting of "[t]he identification of each person who made a contribution in excess of \$200 to the person filing such report, which contribution was made for the purpose of furthering the reported independent expenditure." 11 C.F.R. 109.10(e)(1)(vi). The emphasis is not on how an organization subsequently chooses to use a contribution, but whether the donor made the contribution "for the purpose of furthering the reported independent expenditure."

No contributions accepted by AJS were solicited or received "for the purpose of furthering the reported independent expenditure." Rather, all funds used to further AJS's independent expenditures came from its general treasury funds. Accordingly, no contributions were required to be reported under the regulations cited in the RAI.

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