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June 10, 2009

Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

Re: Focus on the Family Action,
ID C90008186, 48-hour Notices and
Amended 48-hour Notices

Dear Ms. Grant:

This firm represents Focus on the Family Action (Focus Action). This is our response to your letter dated June 4, 2009 requesting additional information on certain 48-hour Notices and Amended Notices, copy enclosed.

1. Your statement that Focus Action "failed to disclosed the identification information for each individual who made a donation" is incorrect. As you know, the disclosure threshold is \$200.00. Since no donors met that threshold, none were identified. A segregated bank account was established to receive donations and all independent expenditures were made from that account. See 11 CFR 114.10(h).
2. Your statement that Focus Action "disclosed an independent expenditure for which you have provided your name and address as the payee" is also incorrect. The named payee is Focus on the Family, a California corporation, income tax exempt under IRC 501(c)(3), a separate and distinct corporation from Focus on the Family Action, a Colorado corporation, income tax exempt under 501(c)(4). Focus on the Family owns and operates certain facilities that Focus Action

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Ms. Michelle Lee Grant
Federal Election Commission
June 10, 2009
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sometimes contracts and pays for. Payment was made by Focus Action to Focus on the Family for those services.

For these reasons, no amendment is required. The Notices are correct as filed. If you have any questions about this, please contact me. Thank you.

Sincerely,

BOPP, COLESON & BOSTROM

A handwritten signature in black ink that reads "Barry A. Bostrom". The signature is written in a cursive, slightly slanted style.

Barry A. Bostrom

enc.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 4, 2009

Sonja Kristine Swiatkiewicz, Treasurer
Focus on the Family Action
8655 Explorer Drive
Colorado Springs, CO 80920

Response Due Date:
July 8, 2009

Identification Number: C90008186

Reference: 48-hour Notices (1/1/08 – 9/4/08), (9/4/08 – 9/22/08), (9/23/08 – 10/7/08), October Quarterly Report (7/1/08 – 9/30/08), Amended 48-hour Notice (10/8/08 – 10/9/08), received 11/13/08, Amended 48-hour Notice (10/10/08 – 10/15/08), received 11/13/09, 48-hour Notice (10/16/08 – 10/27/08) Amended 48-hour Notice (10/28/08 – 10/29/08), received 11/14/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. On FEC Form 5 you have disclosed independent expenditures for which you have failed to disclose the identification information for each individual who made a donation. Please amend your filing to include the missing information. (11 CFR §§ 104.3(b)(3)(vii), 104.4, and 109.10)
2. On FEC Form 5 you have disclosed an independent expenditure for which you have provided your name and address as the payee. Please amend your filing to include the full name and address of the **vendor(s) or person(s)** to whom payment was made. (11 CFR §§ 104.3(b)(3)(vii), 104.4, and 109.10)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to

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taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1168.

Sincerely,



Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
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<i>Jr W</i> PREPARER (3/2005)	<i>6/11/09</i> DATE PREPARED
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