



DOYON
Limited®

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December 30, 2011

Christopher Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

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Re: Request for Additional Information, FEC Form 5, Received 12/10/2010

Dear Mr. Whyrick:

On behalf of Doyon, Limited ("Doyon"), I write in response to your November 9, 2011 letter, in which you requested additional information with regard to Doyon's submission of a 24-Hour Report of Independent Expenditures Made and Contributions Received (FEC Form 5) on December 10, 2010. You asked for clarification of the circumstances surrounding Doyon's disclosure of \$6,718.08 of independent expenditures in support of Lisa Murkowski's campaign for Senate in 2010. Your letter did not inquire about any other 24-hour reports filed by Doyon in connection with the 2010 election; however, in the interest of providing a full and forthright explanation of Doyon's disclosure of independent expenditures during the 2010 election, this letter addresses each of the following 24-hour reports filed by Doyon:

<i>Expenditures made from</i>	<i>Expenditure made through</i>	<i>Date report filed</i>	<i>Date report amended</i>	<i>Total expenditures</i>
10/14/2010	10/18/2010	12/10/2010	-	\$2086.78
10/19/2010	10/20/2010	12/10/2010	2/17/2011	\$2404.41
10/21/2010	10/21/2010	12/10/2010	-	\$1100.18
10/24/2010	10/24/2010	12/10/2010	-	\$1105.74
10/25/2010	10/25/2010	12/10/2010	-	\$6718.08
10/26/2010	10/28/2010	12/10/2010	2/17/2011	\$2034.51
				\$15,449.70

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December 30, 2011

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First, Doyon has not historically been involved in federal election activity. Indeed, Doyon does not have a political action committee. However, in the wake of the Citizens United decision, Doyon chose to participate in a 2010 federal election. Unfortunately, the independent expenditures made with corporate funds during the 2010 election were not internally coordinated. In fact, they were made by individuals who were unaware of the reporting requirements. Upon learning of the amount and timing of the independent expenditures, Doyon immediately hired outside counsel and began to assemble and review the independent expenditures made during the 2010 election. With the assistance of outside counsel, Doyon prepared and filed the 24-hour reports at the earliest possible date. Doyon has since undertaken to develop an internal compliance policy to review, authorize, and timely report federal independent expenditures, prior to making more such expenditures in the future.

Doyon acknowledges filing the 24-hour reports late. However, as evidenced by the circumstances described above, Doyon's leadership is fully committed to compliance with applicable federal election laws and regulations. Due to the unique circumstances of the late 24-hour reports and the corrective steps that Doyon has undertaken, I request that the FEC not impose any fine against Doyon and close this matter.

Doyon welcomes the opportunity to meet with you to discuss this matter and to resolve any additional concerns you may have. Please contact me if you would like to arrange a meeting or if you require additional information. Thank you for your attention to this matter.

Sincerely,



Allen M. Todd
General Counsel

Federal Election Commission
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