

May 12, 2006

Edward D. Ryan  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington D.C. 20463

RE: RQ-2-April 14, 2006  
Amended Year-End Report(07/01/05-12/31/05), Filed 03/27/06  
Humane USA Political Action Committee  
(FEC Committee ID # C00350439)

Dear Mr. Ryan:

This letter responds to your letter dated April 14, 2006, concerning the Humane USA Political Action Committee (the PAC) Amended Year-End Report, covering 07/01/05 through 12/31/05, which was filed on March 27, 2006. Your letter asks for further information about three items.

1) We will address the last item referenced in your letter first. This item requests confirmation that all administrative expenses have been disclosed in full. Please note that a response to an earlier RFAI provided the answer to this question; however, we include our explanation again below.

The report itemized \$46,888.13 in operating expenditures on Schedule B supporting Line 21(b). These items represent the full amount of payments made by the PAC for administrative expenditures within the reporting period. Note that these expenses equal 71% of all disbursements made by the PAC in the period.

Your Request for Additional Information appears to specifically highlight the words "rent" and "utilities," so let me also state for the record that the PAC does not maintain an office. Our dedicated PAC staff and volunteers work out of their own residences. Accordingly there are no rent or mortgage payments and no related utilities. You should note that we itemize payments for cell phone usage directly related to the PAC. As always, it is our aim to comply with all federal, state and local regulations related to campaign finance.

We trust this letter adequately responds to your inquiry, and it is our understanding that we will not be expected to provide a similar response again before the end of the 2005-2006 election cycle.

2) Your second item requests clarification of the nature of itemized expenditures for "in-house mailing." These entries represent payments to a vendor for fundraising for our PAC. The expenditures did not in any way cover any voter registration drive or other public communications activity containing "express advocacy" that might qualify as "in-kind" or "independent" support of any Federal candidate, thus no amendment is necessary.

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3) And finally we address your first request concerning our procedures insuring that we follow the federal regulations for collecting contributor information from all individuals. Please note that the Committee is in the practice of providing the Commission with all employer and occupation information it collects from contributors who gave over \$200 in a given calendar year. All written solicitations for contributions to the Committee request the full name, address, occupation and employer of the contributor. The solicitation also includes the following statement: "Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions are \$200 or more in a calendar year."

The Committee also accepts contributions through a web page. The online form used by individuals to make contributions to the Committee includes the following statement: "Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and employer of individuals who contribute more than \$200 in a calendar year. To help HumaneUSA comply with this requirement, please provide the following information." Spaces are provided for the individual to supply this information.

If any additional contributor information for contributions disclosed on a report is received by the Committee after the report is filed (or located in the Committee records by other means), the Committee will disclose that data either in memo entries on its next regularly scheduled report, or by filing an amendment to the original report. While you are surely aware many people are reluctant to disclose personal information in public forums these days, the PAC intends to comply with all aspects of "best efforts" requirements found in 11 CFR 104.7 in order to make the political process as transparent as possible to the public at large.

To that end, we understand that we must make a follow-up request to any contributor who does not include all the information requested in the solicitation, and that we must do this within 30 days of receipt of a contribution with incomplete contributor data. When we send a written follow-up request, we may also include a thank-you note for the original contribution, but we will not include material on any other subject. The follow-up request will also include a statement reiterating the requirement to collect and report contributor information. A pre-addressed, postage pre-paid return envelope will be included. Any oral follow-up request will be recorded whether or not new contributor data is obtained. As with all Committee endeavors, we will continue to improve our methods of complying with all federal regulations, in particular those set forth in 11 CFR 104.7.

We trust this letter adequately responds to your inquiry. Please feel free to contact me if you have any additional questions about this matter.

Sincerely,

J. Scheele  
Treasurer  
Humane USA PAC