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March 27, 2013

Jill Sugarman
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign (April Quarterly Report 1/1/2012 ? 3/31/2012)
Identification Number: C90012626

This letter responds to your request for additional information dated February 27, 2013 regarding HRC?s April 2012 Quarterly Report and follows our telephone conversation of March 20, 2013 and your voice mail of March 21, 2013.

1.You request that HRC disclose contributions that were used to fund the independent expenditures reported on the above-referenced reports. Your letter states that ?[e]ach contributor who made a donation in excess of \$200 to further the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information.? The regulation that you cite requires the identification of any person who makes a contribution in excess of \$200 to the filer ?which contribution was made for the purpose of furthering the independent expenditure.? See 11 CFR ?109.10(e)(1)(vi) (emphasis added). Consistent with the regulation and the Commission?s guidance on this issue, HRC is required to itemize contributions that were made by a contributor for the purpose of furthering an independent expenditure. The regulation does not require the identification of contributors who give to the organization to support its general programs without specifying that the contribution is ?for the purpose? of making an independent expenditure. HRC has not received any contributions that were made by a contributor ?for the purpose of furthering? an independent expenditure and therefore has not amended any reports in response to your request.

2.You request that HRC amend its report to clarify the election designation for independent expenditures opposing Newt Gingrich and Richard Santorum. In the absence of specific regulations or formal Commission guidance, HRC designated the 2012 General Election for these expenditures because the communications were intended to oppose these candidates in the event they appeared on the ballot in the General Election. HRC did not intend to influence the 2012 Primary Elections on behalf of or in opposition to these candidates. Pursuant to your voice mail, we understand that the Commission prefers disclosure of the election period commensurate with the timing of the communications. Therefore, we have amended our report to clarify the designation as 2012 Primary Election for these expenditures.

Should you need further information regarding your request, please contact Darrin Hurwitz, Deputy General Counsel, at (202) 572-8914.

Sincerely,
Jim Rinefierd
Treasurer