

# HOLTZMAN VOGEL JOSEFIK PLLC

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June 17, 2013

Ben Holly  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Mr. Holly,

We are in receipt of your Request For Additional Information (RAI), dated June 10, 2013, regarding the 2012 Year End Report of Veterans For a Strong America.

In paraphrasing 11 C.F.R. § 109.10(e)(1)(vi), you indicate that "Each contributor who made a donation in excess of \$200 to further the independent expenditures must be itemized on Schedule 5-A, including their identification information." No contributions or donations accepted by Veterans For a Strong America were solicited or received for the purpose of furthering the reported independent expenditures. Accordingly, no contributions or donations were required to be reported under the regulations cited in the RAI.

With respect to 11 C.F.R. § 114.10(f), that provision applies to "qualified nonprofit corporations." Veterans For a Strong America is not a "qualified nonprofit corporation." The cited provision is, therefore, not applicable to Veterans For a Strong America.

If the organization receives any contributions that are required to be reported pursuant to 11 C.F.R. § 109.10(e)(1)(vi), those contributions will be reported as required.

Please contact me with any additional concerns.

Sincerely,



Jason Torchinsky  
Chris Winkelman

Counsel to Veterans For a Strong America

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Federal Election Commission  
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