

June 23, 2010

Ms. Ashley A. Carter  
Federal Election Commission  
Reports Analysis Division  
999 E Street, NW  
Washington, DC 20463

Re: Request for Additional Information (Year End Report, 7/01 - 12/31/2009)

Dear Ms. Carter:

This is in response to the Federal Election Commission's analysis of Freedom's Defense Fund's Year End 2009 FEC Disclosure Report and your request for additional information concerning that report.

#### EXCESSIVE CONTRIBUTIONS

The committee has analyzed the contributions made in 2009 by Mrs. Elizabeth J. Schafer and Mr. Ray P. Oden, Jr. and has determined that their contributions have exceeded the legal limits by \$408 and \$2000 respectively. Contributions refunds will be issued to correct the discrepancy.

#### LIST RENTAL INCOME

Schedule 'A' supporting Line 17 of the report disclosed payments from Legacy List Management, Inc. for List Rental Income. The committee raises contributions through a national direct mail program and as a consequence, the committee rented donor files and allowed its donor file to be rented through its broker: Legacy List Management, Inc. The payments represent the net list rental income earned by the committee for renting its donor file. All list rental expenses paid and income earned were at the 'usual and normal charge' for the industry.

#### EXPENDITURE DESCRIPTIONS

The Committee uses the following descriptions for the Purpose of Disbursement: 'CONSULTING - FUNDRAISING'; 'LIST RENTALS'; 'DIRECT MAIL FUNDRAISING'; 'DIRECT MAIL-CREATIVE'; 'DIRECT MAIL-PRINTING'; 'DIRECT MAIL-MAILSHOP' and 'BANK DEPOSIT' to describe payments related to its direct mail fundraising activities. These fundraising efforts are for the benefit of the PAC and no other committee (Federal or otherwise). These solicitation expenditures do not represent public communications as defined by 11 CFR 100.26.

In addition, the committee used the expenditure description: 'VIDEO PRODUCTION'. This was for the purpose of putting videos on the committee's website.

I trust that this response will satisfy the Commission's request for additional information. Please contact me should you require anything further.

Sincerely,

Scott B. Mackenzie  
Treasurer

Treasurer

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