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May 20, 2015

Ms. Sarah Juris  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

League of Conservation Voters Action Fund: C00252940 (LCVAF)  
RE: October 2014 Monthly FEC (09/01/2014 - 09/30/2014) – Due 5/20/2015

Dear Ms. Juris:

Per our recent conversation on May 6, 2015 the League of Conservation Voters Action Fund (LCVAF) is filing this Form 99 in response to the above mentioned RFAI.

With regards to the first issue raised in the RFAI, foreign addresses appearing on schedule A, LCVAF is cognizant of the rules prohibiting foreign national contributions and has processes in place for verifying that contributions received from foreign addresses are contributions that are received from lawful sources. We are confident that two contributors referenced are U.S. citizens eligible to contribute to LCVAF and as such their contributions were permissible (i.e. for additional verification we confirmed that the two individuals are currently registered voters in California and Ohio). With regards to the second issue raised in the RFAI, earmarked contributions outside the permissible 10 day time period, we have found that the issue almost entirely stems from one aggregate bundling check to Mark Udall for Colorado covering online earmarked contributions made between September 16, 2014 and September 19, 2014.

LCVAF originally cut check number 4036 to Mark Udall for Colorado on September 23, 2014 and that check was mailed to the committee no later than September 25, 2014. Check number 4036 included funds for all 1203 contributions to Udall for Colorado received by LCVAF between September 16, 2014 and September 19, 2014, and was forwarded within the statutory 10 day window. LCVAF subsequently discovered that a vendor's administrative error affected the dollar amount of the check. LCVAF contacted the Mark Udall for Colorado committee and the Udall Committee agreed to return check number 4036 to be replaced by a new check with the correct amount. Replacement check number 4092 was reissued on September 29, 2014. Issuance of a replacement check avoided the possibility of an excessive or impermissible contribution to the Udall Committee.

Thus, funds were forwarded to the Udall committee within the 10 day window, but the Udall Committee returned the check to LCVAF rather than depositing it pursuant to 11 CFR 103.3(a). Because LCVAF forwarded the subject contributions to the Udall Committee within 10 days, LCVAF met its statutory forwarding obligations. The Udall Committee's decision to return that check rather than depositing it did not convert LCVAF's timely forwarding into a late forwarding. LCVAF reported the contributions as forwarded on September 29, 2014 solely because the replacement check was the one cashed by the Udall Committee.

As noted above, the vast majority (1203 out of 1211) earmarked contributions that appeared to be outside the ten day window were related to the replacement check situation noted above. In addition, there were a total of 8 additional bundling checks that show up on this report that were disbursed one or two days late. Atypical administrative errors caused in part by training new staff led to issues with these 8 checks, however we have since improved our procedures in regards to timely disbursement of hard bundling checks received and training new staff handling bundled contributions.

Relevant, detailed backup documentation will follow the submission of this Form 99 via US Mail, per your recommendation. Sincerely,

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Patrick Collins, Treasurer  
League of Conservation Voters Action Fund

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