

ActBlue

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March 23, 2011

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: RFAI concerning 2010 12 Day Pre-General Report

Dear Ms. Lewis,

This letter is in response to your Request for Additional Information dated February 24, 2011. In that letter, you identified payments made by a connected organization to ActBlue's federal account. The payments you reference are offsets to ActBlue's operating expenses for items such as rent. The payer of these offsets is not a connected organization, but rather a related organization to ActBlue (as defined by the Internal Revenue Code) which shares some office resources. ActBlue's operating expenses are not subsidized by any other organization, and as refunds to ActBlue for that portion of resources used by the related organization, these payments do not run afoul of 2 U.S.C. § 441b which you referenced in your letter. We are in the process of amending this report to move these offset payments to the correct line of the Detailed Summary Page, Line 15.

I believe this addresses all of the concerns raised in your letter. If you require any further information, please do not hesitate to contact me by return mail, or by phone at (617) 517-7636.

Sincerely,



Steven Gold
General Counsel

11030584640

Federal Election Commission
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