



National Headquarters

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www.defendersactionfund.org

October 3, 2011

RECEIVED

2011 OCT -3 PM 12:51

FEC MAIL CENTER

Robin Kelly
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Reference: Defenders of Wildlife Action Fund (C90007907) FEC Form 5, received 10/12/2010

Dear Ms. Kelly:

Thank you for your letter dated September 2, 2011, requesting that Defenders of Wildlife Action Fund provide you with additional information regarding its FEC Form 5 filed on 10/12/2010. Specifically, you questioned why we did not report any contributor information and asked us to amend the report to provide the missing information.

There is no missing information to report. Commission regulations require persons other than political committees to include on their independent expenditure reports "the identification of each person who made a contribution in excess of \$200 to the person filing such report, **which contribution was made for the purpose of furthering the reported independent expenditure.**" 11 CFR 109.10(e)(1)(vi) (emphasis added). Neither the statute nor the regulations require us to report all donations we receive in excess of \$200.

We are required to report contributor information only with respect to contributions we receive that are given for the purpose of funding the reportable independent expenditures. I can attest that Defenders of Wildlife Action Fund did not solicit any funds for the purpose of furthering the reported independent expenditures nor did we receive any such funds. As a result, we were not required to provide any itemized contributor information on the form in question.

Please be assured that we are mindful of our reporting obligations under the Commission's regulations, and when we do receive funds from an individual in excess of \$200 for the purpose of furthering a reportable independent expenditure, we dutifully provide the required information on the applicable independent expenditure report.

I trust this letter addresses your concerns, but please do not hesitate to contact me should you have any further questions.

Thank you.

William J Lutz
Senior Director
Defenders of Wildlife Action Fund

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-4

September 2, 2011

DEFENDERS OF WILDLIFE ACTION FUND
1130 17TH ST NW
WASHINGTON, DC 20036

IDENTIFICATION NUMBER: C90007907

Response Due Date
10/07/2011

REFERENCE: FEC FORM 5, RECEIVED 10/12/2010

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 1 item(s):

- Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). However, no contributions are disclosed on Line 6, "Total Contributions." Each contributor who made a donation in excess of \$200 used to fund the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information. Please amend your report to provide the missing information. (11 CFR §§ 109.10(e)(1)(vi) and 114.10(f))

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1170.

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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10/3/11

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 PREPARER
 (3/2005)

10/3/11
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