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April 4, 2014

Jill Sugarman
Senior Campaign Finance & Review Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C90013145

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Senior Campaign Finance & Review Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Sugarman:

I write in response to your March 11, 2014 letter to the U.S. Chamber of Commerce (C90013145) regarding its Year-End Report of independent expenditures for 2013. Your letter notes that "no contributions are disclosed on Line 6, "Total Contributions," and that "[e]ach contributor who made a donation in excess of \$200 to further the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information." You request that the organization amend its report to include this information.

As we pointed out in response to a similar letter from you dated August 28, 2012, the U.S. Chamber understands the applicable FEC reporting regulations and requirements and its Year-End Report fully complies with those requirements. Per the FEC's regulations, filers are required to provide "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); see also Final Rules on Coordinated and Independent Expenditures, 68 Fed. Reg. 404, 413 (Jan. 3, 2003) ("reporting of independent expenditure contributors is limited to those who contributed specifically for independent expenditures"); Statement of Reasons of Chairman Petersen and Commissioners Hunter and McGahn in MUR 6002 (Freedom's Watch, Inc.) at 5 ("a donation must be itemized on a non-political committee's independent expenditure report only if such donation is made for the purpose of paying for the communication that is the subject of the report"). The U.S. Chamber received no such contributions "made for the purpose of furthering" the reported independent expenditures.

Please note that if the U.S. Chamber receives any contributions that are required to be reported pursuant to 11 CFR 109.10(e)(1)(vi), those contributions will be so reported. The omission of contributor information on future reports should not be assumed to be an oversight.

Sincerely,

Ryan P. Meyers
