

FREEDOM'S DEFENSE FUND
MID-YEAR 2010 - FEC DISCLOSURE REPORT

UNITEMIZED CONTRIBUTIONS

The Committee reported unitemized individual contributions of \$47,615.71 on Line 11(a)(ii), Column A of the Detailed Summary Page. These are due to the number of donors whose contributions were raised as part of the committee's direct mail fundraising campaign and represent those individuals whose donations aggregate to less than \$200.

BEST EFFORTS

Given that the majority of the contributions received are as a result of direct mail solicitations and despite the fact that each appeal includes a clear and conspicuous request for the contributor information as well as occupation and employer; many of the donors do not provide that information on the initial request. The committee has established procedures whereby the following steps are taken to satisfy the 'best efforts' requirements: (i) within thirty (30) days of the receipt of the contribution, a letter is sent, clearly asking for the missing information, without soliciting a contribution; (ii) we inform the contributor of the requirements of federal law for the reporting of such information; and (iii) we provide a pre-addressed return envelope, a fax number and an email address. Upon receipt of the information the committee amends its reports to provide the new information.

ADMINISTRATIVE EXPENSES

The Committee has disclosed limited payments for administrative expenses. Presently, there is no salaried staff and no formal headquarters - even the Treasurer, whose duties are solely related to accounting and compliance, is an unpaid volunteer. For these reasons, the Committee has limited payments for traditional administrative expenses.

EXPENDITURE DESCRIPTIONS

The Committee has used the following descriptions for the Purpose of Disbursement: 'DIRECT MAIL FUNDRAISING'; 'DIRECT MAIL-CREATIVE'; 'DIRECT MAIL-PRINTING'; 'DIRECT MAIL-MAILSHOP'; 'CONSULTING - FUNDRAISING' and 'LIST RENTALS' 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.

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.

EXCESSIVE CONTRIBUTION

The Committee found a number of donors who had duplicate records on the FECfile system. After merging the duplicate records, one of the donors, Hanna Rose Zimmermann appears to have exceeded the \$5,000 contribution limit. Her revised aggregate contribution now totals \$6,820 - the committee will review her contributions and make an appropriate contribution refund of her excessive amount.
