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March 4, 2015

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

Dear Ms. Sugarman:

I write in response to your January 28, 2015 letter to the U.S. Chamber of Commerce (C90013145) regarding its October quarterly report of independent expenditures for 2014. Your letter raises three issues, which I address below.

Item #1

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.

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, therefore the absence of contributors on Line 6 was intentional and consistent with the FEC's regulations.

Item #2

Your letter asks about an expenditure of \$50,000 made on 9/22/14 for internet advertising opposing Jeanne Shaheen. Your letter notes that there is not a corresponding entry on a 48-hour report for this expenditure.

Around the time that this expenditure occurred, the employee who was responsible for initiating the payment and reporting of independent expenditures was in the process of winding down his employment with the Chamber. For reasons that are unknown to the Chamber, he initiated payment of this particular expenditure but may not have initiated a corresponding 48-hour report per the Chamber's protocol. The Chamber included the expenditure in its October quarterly report which was prepared and filed after the employee's departure. The Chamber has taken steps to ensure that the new employee responsible for FEC reporting understands that expenditures such as the one involving Jeanne Shaheen must be reported to the FEC within the designated time periods.

Item #3

Finally, your letter asks about an expenditure of \$150 made on 9/4/14 for website development costs in support of Scott Brown. Your letter notes that a corresponding entry on a 48-hour report appears to have been filed late.

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The October quarterly report entry of \$150 for website development costs on 9/4/14 was redundant and in error. These costs were subsumed within the entry on page 16 of the October quarterly report (Image# 14978329250) which lists \$1,443.58 in expenditures on 9/6/14 for ?Website development ? www.voterforjobs.com and email expenditure supporting Scott Brown.? The Chamber included a corresponding entry on page 12 (Image# 14970739931) of a 48-hour report timely filed on 9/5/14. The Chamber will file an amended October quarterly report removing this redundant and erroneous \$150 entry.

If the Commission has any questions about these items or needs additional information, please let me know.

Very truly yours,

Abby Majlak
