

JAMES BOPP, JR.<sup>1</sup>

Senior Associates

RICHARD E. COLESON<sup>1</sup>

BARRY A. BOSTROM<sup>1</sup>

Associates

RAEKANNA S. MOORE<sup>2</sup>

JEFFREY P. GALLANT<sup>2</sup>

ANITA Y. WOLDENBERG<sup>1</sup>

JOSIAH S. NEELEY<sup>1</sup>

## BOPP, COLESON & BOSTROM

ATTORNEYS AT LAW

(not a partnership)

1 South Sixth Street

TERRE HAUTE, INDIANA 47807-3510

Telephone 812/232-2434 Facsimile 812/235-3685

E-MAIL ADDRESSES

jboppjr@aol.com

rcoleson@bopplaw.com

bbostrom@bopplaw.com

rmoore@bopplaw.com

kgallant@bopplaw.com

awoldenberg@bopplaw.com

jneeley@bopplaw.com

tmarzen@bopplaw.com

Of Counsel

THOMAS J. MARZEN<sup>1</sup>

<sup>1</sup>admitted in Ind.

<sup>2</sup>admitted in Va.

<sup>1</sup>admitted in Ill.

<sup>1</sup>admitted in Tex.

May 3, 2007

Ms. Camilla Reminsky  
Senior Campaign Finance Analyst  
Federal Election Commission  
Washington, DC 20463

Re: Focus on the Family Action,  
Identification No. C30000673

Dear Ms. Reminsky:

Thank you for speaking with me today. This is our response to your letter dated April 26<sup>th</sup>, requesting an explanation of the "substantial increase in the amount of receipts from those disclosed on your original notice." You indicated in our telephone conversation today that although the Amended 24 Hour Notice of Disbursements/Obligations for Electioneering Communication, dated 11/22/06, was acceptable to the Commission, you were requesting an explanation by letter of the reason why no donations were disclosed on the original 24 Hour Report.

The original 24 Hour Report disclosed no donations because of my advice to the client that since no donations were itemized on Schedule 9-A, the total on Line 9 should be reported as zero. I based this advice on the Instructions for FEC Form 9, which state:

LINE 9. Total Donations This Statement. *Provide the sum total of donations itemized on Schedule 9-A (emphasis added).*

I read this instruction literally and gave my advice based on it. Nothing in 11 CFR 104.20 is contrary to this interpretation.

However, you informed us in your letter dated November 7, 2006, that "The total amount of donations received should be listed on Line 9, *regardless of the itemization requirement*" (emphasis added). Based on your letter, we filed an Amended 24 Hour Report showing the total of un-itemized donations on Line 9, which you now acknowledge is acceptable to the Commission.

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Federal Election Commission

May 3, 2007

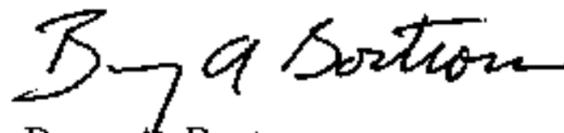
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This is our explanation as to why the original report showed no donations on Line 9. I respectfully suggest that the Instructions for Line 9 be revised to state: "Provide the sum total of donations *whether or not* itemized on Schedule 9-A." This change would give proper guidance to those persons completing FEC Form 9, and to those attorneys giving advice to their clients.

Please acknowledge receipt of this response. Thank you.

Sincerely,

BOPP, COLESON & BOSTROM



Barry A. Bostrom

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Federal Election Commission  
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<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
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 PREPARER 5/9/07  
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