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December 1, 2014

Nicole Miller  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

Identification Number: C00488304

Reference: July Quarterly Report (4/1/1-6/30/14)

Dear Ms. Miller:

This letter is in response to your request for additional information dated October 27, 2014

1. The Committee has reviewed the list of donors provided that were shown as chargebacks or returned checks with no matching original contribution. All original contributions are entered in FECFILE, the filing software provided by the Federal Election Commission, but FECFILE did not itemize them on the above referenced report. The Committee has now force itemized these original contributions and the July Quarterly Report has been amended to reflect the update.
2. Your letter indicates that several of the employer and occupation entries have incomplete or missing information and that the full name of each donor is required. The Committee does follow the three-fold process of best efforts required to meet the Commission standards.

Every solicitation includes a clear and conspicuous request for contributor information and informs the contributor of the requirements of federal law for the reporting of such information. Please note that many of the contributions are received via the internet and that the Committee's donor page will not allow a contributor to give without completing the name, employer and occupation information. The Committee disclosed these exactly as the contributor entered them and, in most cases, the contributor has not provided additional information.

If the information is not initially received, within 30 days of receipt, the contributor receives a request to provide this information. Any follow up request clearly asks for the missing information and does NOT contain a solicitation for a new contribution. These requests are generally made by phone, email and by letter. This request restates the requirements of federal law for reporting of such information. If the request is sent by mail, it includes a pre-addressed return envelope. If the information is received by the Committee, it is updated and the affected report will be amended to reflect the new information or the Committee will submit the new information via miscellaneous filing. The above referenced report has been amended to include any updated donor information. All donor names are reported as specified by the donor.

3. The Committee is well aware of the regulations regarding expenditures made for the benefit of other federal committees-either through independent expenditures or in kind contributions. The Committee reported expenses for Advertising: Online, Communications Consulting, Direct Mail, Direct Mail Production, Postage, Postage/Shipping, Printing and Telemarketing on line 21b because they were expenses related to fundraising for the American Legacy PAC. If they had been expenses for in kind contributions, they would have been itemized on Schedule B, Line 23. If they had been expenses for independent expenditures, they would have been itemized on Schedule E, Line 24. The Commission made it clear to Political Action Committees during the 2012 cycle that it was no longer required to put the word PAC in front of every expense to clarify it was a PAC expense-reporting these expenses on line 21b was sufficient. As the Committee indicated in its miscellaneous report filed 8/29/14, it will continue to accurately report its disbursements.

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Sincerely,

Mike Murray  
Treasurer

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