

Marlene Daughtrey
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.

Washington, D.C. 20463

By electronic submission

Regarding: Title Industry Political Action Committee (TIPAC) (ID # C00012914)

December 2009 Monthly Report Request for Additional Information (RFAI)

Dear Ms. Daughtrey:

An RFAI dated January 29, 2010 requests additional information regarding disclosure of donor names and addresses and best efforts to collect occupation and employer information on TIPACs December monthly report.

The December monthly report initially disclosed a series of \$20.00 contributions from donors identified as anonymous, with address, occupation, and employer information listed as requested.

These contributions were, in fact, anonymous contributions collected at a members only event in a fashion in which neither TIPAC nor its connected organization, American Land Title Association (ALTA), was aware of the identity of the donors. (See Advisory Opinion 1980-99; MUR 6171 (2009).)

Contemporaneous with this response, and as previously discussed with you, TIPAC is filing an amended December monthly report deleting the anonymous itemized contributions, moving this total into the un-itemized contributions line and adjusting the itemized contributions total accordingly. Because these changes will affect the year-to-date totals for itemized and un-itemized contributions, TIPAC is also making a conforming amendment to its year-end report.

These amendments should resolve both the donor identification and occupation/employer queries on the RFAI.

The report amendments and this response should respond fully to your January 29 RFAI. If, however, you need further information, please let us know.

Best regards,

Kurt Pfothauer
