



HAND DELIVERED

National Headquarters

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www.defendersactionfund.org

RECEIVED

2013 SEP 19 PM 4:33
FEC MAIL CENTER

September 19, 2013

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20036

ID#: C00503318 Defenders of Wildlife Action Fund PAC

Re: September 12, 2013 RFAI regarding July 2013 Quarterly Report

Dear Ms. Lewis:

Thank you for your letter of September 12, 2013 noting what appeared to be an excessive contribution to the Defenders of Wildlife Action Fund PAC (the "PAC"). We are grateful for the opportunity to address this issue.

The PAC actually did not receive an excessive contribution. The contribution in question—reported as being received on May 31, 2013 from Mari Snyder Johnson in the amount of \$10,000—was erroneously reported as a contribution to the PAC. The contribution was actually designated for and received by the PAC's connected organization, Defenders of Wildlife Action Fund. The PAC itself never received or deposited the contribution in question. We discovered this clerical reporting error internally on September 4, 2013, and filed an amended report with clarifying information that same day to correct the mistake.

Thank you again for bringing this issue to our attention and we apologize for any inconvenience. We hope that this response and the amended report we filed prior to, albeit consistent with, your letter will assure the Commission that no further action is necessary. If you need more information from us on this matter, please do not hesitate to contact me or William Lutz, Senior Director of the Defenders of Wildlife Action Committee.

Sincerely,

Jamie Rappaport Clark
Treasurer
Defenders of Wildlife Action Fund PAC

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 12, 2013

JAMIE RAPPAPORT CLARK, TREASURER
DEFENDERS OF WILDLIFE ACTION FUND
PAC
1130 17TH ST NW
WASHINGTON, DC 20036

Response Due Date
10/17/2013

IDENTIFICATION NUMBER: C00503318

REFERENCE: JULY QUARTERLY REPORT (04/01/2013 - 06/30/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal

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DEFENDERS OF WILDLIFE ACTION FUND PAC

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elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

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DEFENDERS OF WILDLIFE ACTION FUND PAC

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Sincerely,

Rosa Lewis

Rosa Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
DEFENDERS OF WILDLIFE ACTION FUND PAC (C00503318)**

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
Johnson, Mari Snyder	5/31/13	\$10,000.00	2013 July Quarterly

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt
9/19/13

USPS First Class Mail Postmarked

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Overnight Delivery Service (Specify): Shipping Date
Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

 9/19/13
 PREPARER DATE PREPARED

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