

## FEDERAL ELECTION COMMISSION Washington, DC 20463

AM NOV 15 P 4:46

November 16, 2011

AGENDA ITFM

**MEMORANDUM** 

TO:

The Commission

For Meeting of <u>11-17-11</u>

FROM:

Christopher Hughey CH (SPRCS) SUBMITTED LATE

Rosemary C. Smith Associate General Counsel

Amy L. Rothstein AUR Assistant General Counsel

Theodore M. Lutz

Attorney

Jessica Selinkoff

Attorney

Subject:

Draft AO 2011-19 (GivingSphere)

We have been asked to circulate these proposed changes to the subject advisory opinion (Agenda Document 11-66) for the November 17, 2011 agenda.

On page 8, replace the last sentence of Footnote 2 with:

Because GivingSphere will not enter into any transactions with political committees under the proposal discussed in Question 1, the Commission has no need to address in its answer to Question 1 whether political committees would pay GivingSphere the usual and normal charge for its services.

On page 11, replace "their customers" on line 17 with "the contributors".

On page 11, insert "individual" before "customers" on line 23.