



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

November 21, 2013

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dan Backer, Esq.  
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Coolidge Reagan Foundation  
1629 K Street, N.W., Suite 300  
Washington, DC 20006

RE: Advisory Opinion Request 2013-15

Dear Messrs. Backer and Kamenar:

This letter responds to your letter dated August 15, 2013, and your email received on August 27, 2013, requesting an advisory opinion on behalf of Conservative Action Fund. The purpose of this letter is to inform you that the Commission has concluded its consideration of your advisory opinion request without issuing an advisory opinion.

The Commission released four public drafts of advisory opinions in response to your request. On November 7, 2013, the Commission released for public comment Agenda Document No. 13-45, containing one draft. On November 13, 2013, the Commission released for public comment Agenda Document No. 13-45-A, containing two additional drafts. On November 20, 2013, the Commission released for public comment Agenda Document No. 13-45-B, containing a fourth draft. These agenda documents are available on the Commission's website.

At its Open Meeting of November 21, 2013, the Commission considered but did not approve any of the draft advisory opinions. Under the Federal Election Campaign Act of 1971, as amended, the affirmative vote of four members of the Commission is required for the Commission to render an advisory opinion. *See* 2 U.S.C §§ 437c(c), 437d(a)(7); *see also* 11 C.F.R. § 112.4(a). The Commission voted 3-3 on Agenda Document No. 13-45-B. Thus, the Commission was unable to render an opinion in this matter.

Dan Backer, Esq.  
Paul D. Kamenar, Esq.  
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If you have any questions, please contact Jessica Selinkoff, an attorney in this Office, at 202/694-1650.

Sincerely,

(signed)  
Adav Noti  
Acting Associate General Counsel