



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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November 16, 2011

## AGENDA ITEM

### MEMORANDUM

TO: The Commission

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Subject: Draft AO 2011-19 (GivingSphere)

For Meeting of 11-17-11

**SUBMITTED LATE**

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.