



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 15, 2016

SHEILA L. JACKSON, TREASURER
CITIZENS FOR RUSH
P. O. BOX 7292
CHICAGO, IL 60680-7292

Response Due Date

06/20/2016

IDENTIFICATION NUMBER: C00257121

REFERENCE: APRIL QUARTERLY REPORT (02/25/2016 - 03/31/2016)

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 6 item(s):

1. Schedule A of your report discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 (formerly 2 U.S.C. §§ 441a(f) and 441b) or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

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If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(b) or (c), as applicable, of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

2. Your report fails to provide proper election designations for contributions disclosed on Schedule A supporting Line 11(c). Authorized committees should indicate the election for which the contribution was designated. If no election is designated, the contribution is applied to the next election for the federal office the candidate is seeking after the contribution date. Please be advised that incorrect election designations may result in excessive or impermissible contributions. Please amend your report to clarify election designation "G2650." (11 CFR §§ 110.1(b) and 110.2(b))

3. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following descriptions: "Campaign Visibility," "EDAY Visibility," "Election Day Worker," "Election Worker," "Services Rendered," "Services Rendered - February 2016," "Services Rendered Election Day," "Visibility," and "Visibility in 5Th Ward." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf. A non-exhaustive list of acceptable purposes is also available on the FEC website at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>.

4. Schedule B of your report discloses reimbursements to individuals for the following disbursements: "Election Day Expenses," "Expense Reimbursement," "Phone Bank Expenses," "Reimbursement for Credit Card Charge - Bistro Ca," "Reimbursement for EDAY Van Rental," "Reimbursement for Sr. Brkfast Bus Rental Balance," "Senior Breakfast Expenses," "Sr.. Breakfast - Reimbursement for the Printing of Programs," and

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"Subway Food for Election Day Workers & Bags for EDAY Kits." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

5. Schedule B of your report discloses disbursements with the purpose "Cash for Expenses," "Cash for Office Mgr. & EDAY Supplies," "Cash for Phone Bank Expenses," "Cash to Pay Election Day Workers, etal," and "Cash to Reimburse Receipts Received EDAY" that appear to be made from petty cash. Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in an election cycle, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (52 U.S.C. §30102(h)(2) (formerly 2 U.S.C. §432(h)(2)) and 11 CFR § 102.11)

6. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address and purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

- Please be advised that the FEC Committee ID number for the following contribution from a political committee appears to be incorrect: Service Employees International Union (C70003124). Use of incorrect FEC Committee ID numbers may create difficulty in identifying the contributing committee for the public record. (11 CFR § 104.3(a)(4))

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**

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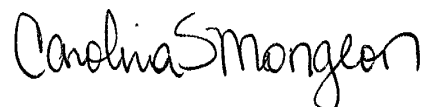
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not be considered.

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) 694-1138.

Sincerely,

A handwritten signature in black ink that reads "Carolina Mongeon". The signature is written in a cursive, flowing style.

Carolina Mongeon
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
Citizens for Rush (C00257121)**

Contributions from Unregistered Organizations

Contributor Name	Date	Amount	Election
Friends of Devlin Schoop	3/9/16	\$2,700.00	P2016
Friends of Tom Greenhaw	3/14/16	\$500.00	P2016