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NAME OF COMMITTEE (In Full)  
Citizens United Political Victory FundFEC IDENTIFICATION NUMBER  
C00295527

Mailing Address 1006 Pennsylvania Ave. SE

City	State	ZIP Code
Washington	DC	20003

October 25, 2017

Brian Jones  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re:C00295527  
Reply to your September 20, 2017 correspondence concerning CU-PVFs  
April Monthly Report covering March 1, 2017 March 31, 2017

Dear Mr. Jones:

I write in reply to your letter dated September 20, 2017, to Kevin Allen, Treasurer of Citizens United Political Victory Fund (CU-PVF), requesting additional information regarding CU-PVFs April Monthly Report covering March 1, 2017 March 31, 2017. Pursuant to your request for clarification regarding the two items identified in the above-referenced correspondence, please be advised as follows:

1. You state that these reports are missing occupation and/or employer information for several of the contributions disclosed in Schedule A. You request that CU-PVF either (a) file an amended report providing the missing information or (b) provide a detailed description of CU-PVFs procedures for complying with the Commissions best efforts requirements for obtaining the contributor identifier information required to be disclosed.

CU-PVFs treasurer believes that the procedures CU-PVF has established for obtaining and disclosing the identity of its contributors fully complies with the Commissions best efforts requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g. direct mail) a response form is included listing the contributors name and address as it appears in Citizens Uniteds membership records. The form includes a request that the contributor correct any inaccurate or missing information. The form also asks that the contributor provide his or her occupation and employer. For oral solicitations (e.g. telemarketing), the request is made orally as part of the solicitation script. In either case, the request includes a statement that Federal law requires CU-PVF to use its best efforts to obtain and report the required information for any person who contributes in excess of \$200 in a calendar year.

Second, a follow-up letter acknowledging the contribution is promptly mailed to each contributor requesting the required information. This letter is to be mailed within 30 days of receipt of a contribution and advises the contributor that Federal law requires CU-PVF to use best efforts to obtain the required information from all persons who contribute in excess of \$200 in a calendar year. The follow-up letter includes a form for providing the information. Enclosed with the follow-up letter and form is a pre-addressed envelope for returning the completed form to CU-PVF.

Third, if a contributor returns the completed form prior to the deadline for completing the FEC Report for which the information is required to be disclosed, the information is included in the initial report. If the information is

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provide subsequent to the filing of the initial report, it is CU-PVFs policy to file an amended report disclosing the newly obtained information on or before the due date for the next regularly schedule report.

CU-PVF believes that the procedures described above fully conform with both the letter and spirit of the Commissions best efforts requirements. However, if you believe there is a deficiency in the process please let me know so that we can discuss any steps necessary to rectify the matter.

2.The March 30, 2017 contribution to Ted Cruz for Senate that you reference in the attachment to your letter was erroneously reported as a contribution for the 2018 primary election. However, the contribution was actually made for the 2018 general election. An amended report covering March 2017 is being filed to correct the erroneous disclosure.

Please contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,

Michael Boos  
Vice President &  
General Counsel  
Citizens United

cc: Kevin Allen, Treasurer, CU-PVF