



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 18, 2016

LAUREN CATTS, TREASURER  
CITIZENS UNITED SUPER PAC LLC  
1006 PENNSYLVANIA AVE SE  
WASHINGTON, DC 20003

**Response Due Date**

**09/22/2016**

IDENTIFICATION NUMBER: C00497420

REFERENCE: AMENDED APRIL QUARTERLY REPORT (01/01/2016 - 03/31/2016),  
RECEIVED 04/29/2016

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 7 item(s):

1. Your amended report discloses an increase in receipts totaling \$115,469.77 and an increase in debts owed to one or more vendors totaling \$35,541.75 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Your amended report discloses a decrease in disbursements totaling \$51,436.93 from the amounts disclosed on your original report. Please amend your report or provide an explanation to clarify why this activity was not provided with your amended report. (11 CFR § 104.3)
3. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer and occupation entries appear on your report and are not considered acceptable: "Information Requested / Information Requested," "Macrie Brothers / Self Employed," and "Self employed / Self Employed."

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You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts" you must provide the Commission with a detailed description of your procedures for requesting the information.

The Commission notes that the Committee previously submitted a description of its "best efforts" procedures. These procedures were deemed incomplete for the following reason(s):

Your follow-up requests for contributor information:

- did not clearly ask for the missing information without soliciting a contribution. (11 CFR § 104.7(b)(2))
- did not include a pre-addressed post card or return envelope. (11 CFR § 104.7(b)(2))
- was not made within 30 days of receiving the contribution. (11 CFR § 104.7(b)(2))
- did not indicate that you would update your reports to include the missing information. (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information and a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts", please refer to the Campaign Guide.

**4.** Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). Please file an amendment to your report to disclose the current status of these omitted debts: "Public Affairs Support Services Inc." (11 CFR §§ 104.3(d) and 104.11)

**5.** Your calculations for debts on Schedule D are incorrect (see attached). Please amend your report to correct the discrepancies (11 CFR §104.3(d))

**6.** Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to

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and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

7. Your committee filed 48 hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Donor Bureau," "Sunrise Data Services," "Corporate Press Inc.," "Fulfillment House Inc.," "Valley Press," "STMP," "NOVA List Company," "HSP Direct LLC," "Image Direct LLC," "Tri-State Envelope Corporation," "InfoCision," and "L&E Meridian" as the payee(s). However, the amounts and **dates** of public dissemination disclosed on these reports do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour reports supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these reports. (11 CFR §104.4)

- Schedule B of your report discloses an expenditure(s) for "Postage and Delivery," "Postage & Delivery," and "Printing & Mailshop." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

**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

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taking enforcement action. **Requests for extensions of time in which to respond will 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) 694-1172.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Baisden", with a stylized, cursive script.

Jack Baisden  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Outstanding Debt Calculated Incorrectly**  
**CITIZENS UNITED SUPER PAC, LLC (C00497420)**

<b>Debtor Name</b>	<b>Reported Outstanding Balance</b>	<b>Reported Outstanding Balance Calculated by FEC</b>
InfoCision	\$0.00	\$2,337.96

**Missing 48 Hour Report (Schedule E)**  
**CITIZENS UNITED SUPER PAC, LLC (C00497420)**

<b>Name of Payee</b>	<b>Dissemination Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
HSP Direct LLC	1/4/2016	\$2,462.80	Hillary Clinton	G2016
HSP Direct	1/4/2016	\$4,700.00	Hillary Clinton	G2016
STMP	1/4/2016	\$13,350.00	Hillary Clinton	G2016
NOVA List Company	1/4/2016	\$3,500.00	Hillary Clinton	G2016
STMP	2/10/2016	\$5,082.29	Hillary Clinton	G2016
InfoCision	2/11/2016	\$983.19	Hillary Clinton	G2016
STMP	2/12/2016	\$1,034.10	Hillary Clinton	G2016
Rite Envelope and Graphics	2/15/2016	\$895.96	Hillary Clinton	G2016
Rite Envelope and Graphics	2/15/2016	\$774.28	Hillary Clinton	G2016
Rite Envelope and Graphics	2/15/2016	\$895.96	Hillary Clinton	G2016
Rite Envelope and Graphics	2/15/2016	\$774.28	Hillary Clinton	G2016
Sunrise Data Services	2/15/2016	\$590.00	Hillary Clinton	G2016
Sunrise Data Services	2/15/2016	\$575.00	Hillary Clinton	G2016
STMP	2/17/2016	\$3,800.41	Hillary Clinton	G2016
STMP	2/17/2016	\$1,000.00	Hillary Clinton	G2016
STMP	2/17/2016	\$2,841.43	Hillary Clinton	G2016
STMP	2/22/2016	\$1,600.34	Hillary Clinton	G2016
STMP	2/22/2016	\$1,600.82	Hillary Clinton	G2016
STMP	2/22/2016	\$538.55	Hillary Clinton	G2016
STMP	2/22/2016	\$538.71	Hillary Clinton	G2016
STMP	2/22/2016	\$762.01	Hillary Clinton	G2016
STMP	2/22/2016	\$5,082.29	Hillary Clinton	G2016
HSP Direct LLC	2/22/2016	\$288.86	Hillary Clinton	G2016
HSP Direct LLC	2/22/2016	\$2,218.87	Hillary Clinton	G2016
HSP Direct LLC	2/22/2016	\$2,218.87	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$755.62	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$611.94	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$529.76	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$425.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$830.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$830.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$815.56	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$120.89	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$120.89	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$20.60	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$20.60	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$48.18	Hillary Clinton	G2016

**Missing 48 Hour Report (Schedule E)**  
**CITIZENS UNITED SUPER PAC, LLC (C00497420)**

NOVA List Company	2/22/2016	\$48.18	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$146.79	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$755.62	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$611.94	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$529.76	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$425.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$830.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$830.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$815.56	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$120.89	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$120.89	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$20.60	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$20.60	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$48.17	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$48.17	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	2/22/2016	\$146.79	Hillary Clinton	G2016
HSP Direct LLC	2/23/2016	\$185.93	Hillary Clinton	G2016
Image Direct LLC	2/24/2016	\$3,193.23	Hillary Clinton	G2016
Image Direct LLC	2/24/2016	\$3,203.78	Hillary Clinton	G2016
Colortree Group Inc.	3/3/2016	\$1,932.00	Hillary Clinton	G2016
HSP Direct LLC	3/7/2016	\$934.36	Hillary Clinton	G2016
HSP Direct LLC	3/7/2016	\$934.64	Hillary Clinton	G2016
MDI Imaging and Mailing	3/9/2016	\$4,000.00	Hillary Clinton	G2016
STMP	3/9/2016	\$1,146.91	Hillary Clinton	G2016
STMP	3/9/2016	\$1,034.26	Hillary Clinton	G2016
HSP Direct LLC	3/9/2016	\$1,837.32	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$580.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$580.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$850.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$850.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$850.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$850.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$799.79	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$96.60	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$150.00	Hillary Clinton	G2016

**Missing 48 Hour Report (Schedule E)**  
**CITIZENS UNITED SUPER PAC, LLC (C00497420)**

NOVA List Company	3/9/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$150.00	Hillary Clinton	G2016
NOVA List Company	3/9/2016	\$39.03	Hillary Clinton	G2016
STMP	3/9/2016	\$2,030.00	Hillary Clinton	G2016
HSP Direct LLC	3/21/2016	\$314.43	Hillary Clinton	G2016
HSP Direct LLC	3/21/2016	\$314.52	Hillary Clinton	G2016
MDI Imaging and Mailing	3/21/2016	\$4,043.97	Hillary Clinton	G2016
HSP Direct LLC	3/23/2016	\$444.90	Hillary Clinton	G2016
HSP Direct LLC	3/28/2016	\$603.76	Hillary Clinton	G2016
HSP Direct LLC	3/28/2016	\$603.86	Hillary Clinton	G2016