



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 29, 2011

JILL GRIFFIN, TREASURER
TRANS UNION LLC POLITICAL ACTION
COMMITTEE
555 WEST ADAMS ST
CHICAGO, IL 60661

Response Due Date
01/03/2012

IDENTIFICATION NUMBER: C00313700

REFERENCE: JULY QUARTERLY REPORT (04/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 4 item(s):

1. On Schedule B of your report, you have disclosed disbursements to a federal candidate committee(s). Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, purpose, state, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state, office sought, and district. (11 CFR §104.3 (b)(3))
2. On Schedule B supporting Line 23 of the Detailed Summary Page, your committee discloses a disbursements listing itself ("TRANS UNION LLC POLITICAL ACTION COMMITTEE") as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.
3. Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per

TRANS UNION LLC POLITICAL ACTION COMMITTEE

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pay period. Please refer to the enclosed sample of properly reported payroll deductions. (11 CFR §104.8(b))

4. Schedule B supporting Line 23 of your report discloses contributions to a candidate designated for "C, Convention"; however, it appears the candidate did not participate in the election indicated. Please amend your report to clarify the election designation for the contribution.

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 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) 694-1139.

Sincerely,



Nicole Della Rocco
Senior Campaign Finance Analyst
Reports Analysis Division

Sample

Completing FEC Form 3X

Payroll Deductions

SCHEDULE A (FEC Form 3X)		FOR LINE NUMBER: (check only one)		PAGE	OF
ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.		<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
		<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
		<input type="checkbox"/> 17			
NAME OF COMMITTEE (In Full) Critical Reason Inc. PAC					
Full Name (Last, First, Middle Initial) A. Kant Immanuel			Date of Receipt payroll deduction*		
Mailing Address 3 Critiques Ave.			MM / DD / YYYY		
City Konigsburg		State VA	Zip Code 33333		
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 90.00			
Name of Employer Critical Reason Inc.		Occupation Brand Manager			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date 285.00			
		(\$15.00 biweekly)**			

*Adding Extra Text/Explanation: When using FECFile electronic filing software, this information can be entered using the “memo text” window. To make a memo text entry, select the “view” menu on the FECFile toolbar. Select “All Transactions.” Single click (highlight) the transaction to which the memo text will be attached. Then select the “Edit” menu on the toolbar and select “memo text.”

**When using FECFile electronic filing software, enter this information in the “description” field.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager’s aggregate contributions are \$195—still below the \$200 itemization threshold. The manager’s second-quarter contributions again are included in “unitemized contributions” in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager’s contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See the illustration above.)

In-Kind Contributions

When determining whether to itemize an *in-kind contribution* received, follow the same guidelines listed above under “When to Itemize Receipts.” See page 9 for information on how to determine the dollar value of an *in-kind contribution*.

In addition, add the value of the *in-kind contribution* to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the *in-kind contribution* must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration on page 56.

Appreciated Goods

When a committee receives an *in-kind contribution* whose value may appreciate over time, such as stock or artwork, special reporting rules apply:

- Itemize the initial gift, if necessary, as a *memo entry* on Schedule A (see “When to Itemize Receipts,” on page 53). Under “Amount,” report the fair market value of the *contribution* on the date the item was received. Do not include that amount in the total for Line 11(a)(i) on the Detailed Summary Page.
- Once the item is sold, report the sale price as a *contribution* on Line 11(a)(i) if the purchaser is known or as an “other receipt” on Line 15 if the purchaser is unknown.

Itemize the transaction on Schedule A if necessary. 104.13(b). See also AO 1989-6.

Joint Contributions

A *joint contribution* is made by a single check that bears two signatures. A check with one signature may also be a *joint contribution* if an accompanying form or letter, signed by both contributors, instructs the committee to treat it as a *joint contribution*. (A check drawn on a joint bank account but signed by only one person does not qualify as a *joint contribution*. Attribute the full amount of such a check only to the person who signed it. Alternatively, a reattribution may be sought using the procedures described below.)

For the purposes of itemization, report a *joint contribution* as though the joint contributors had given separately.

A *joint contribution* is itemized in items A and B in the illustration on page 57. In this case, the committee received a \$1,000 check from a married couple, signed by both spouses. Because there were no