



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 12, 2016

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

**Response Due Date**

**11/16/2016**

IDENTIFICATION NUMBER: C00497420

REFERENCE: JULY QUARTERLY REPORT (04/01/2016 - 06/30/2016)

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 5 item(s):

1. Your report discloses a payment(s) on Schedule D to "Colortree Group Inc.," "Image Direct LLC," "Rite Envelope and Graphics," and "Tri-State Envelopes" which has not been recorded on a disbursement schedule. Loan payments must be reflected on a Schedule B as well as on Schedule C, and debt payments must be reflected on a Schedule B or E as well as on Schedule D. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(5)(D) and (b)(8) (formerly 2 U.S.C. §434(b)(5)(D) and (b)(8)))
2. 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: "Donor Bureau," "Fulfillment House Inc.," "HSP Direct LLC," "Image Direct LLC," "MDI Imaging and Mailing," "NOVA List Company," "Right Design Group," and "Sunrise Data Services." (11 CFR §§ 104.3(d) and 104.11)
3. Schedule D of your report itemizes debt owed to "Bigeye Direct," "HSP Direct LLC," "Public Affairs Support Services Inc.," and "Washington Intelligence Bureau" with an outstanding beginning balance(s) not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))
4. Schedule E of your report indicates that your committee may have failed

CITIZENS UNITED SUPER PAC LLC

Page 2 of 3

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 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))

5. Your committee filed 48 hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Bigeye Direct," "Corporate Press Inc.," "Donor Bureau," "Fulfillment House Inc.," "HSP Direct," "Infocision," "L&E Meridian," "MDI Imaging & Mail," "NOVA List Company," "Rite Envelope & Graphics Inc.," "STMP," "Tri-State Envelope Corporation," and "Valley Press" 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)

**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

CITIZENS UNITED SUPER PAC LLC

Page 3 of 3

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". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jack Baisden  
Senior Campaign Finance Analyst  
Reports Analysis Division

327

**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>
STMP	4/1/16	\$1,076.51	Hillary Clinton	G2016
STMP	4/1/16	\$1,076.77	Hillary Clinton	G2016
HSP Direct	4/4/16	\$1,257.25	Hillary Clinton	G2016
STMP	4/11/16	\$1,143.22	Hillary Clinton	G2016
STMP	4/14/16	\$5,082.29	Hillary Clinton	G2016
STMP	4/14/16	\$2,841.43	Hillary Clinton	G2016
STMP	4/14/16	\$2,030.00	Hillary Clinton	G2016
HSP Direct	4/18/16	\$711.67	Hillary Clinton	G2016
HSP Direct	4/18/16	\$766.10	Hillary Clinton	G2016
STMP	4/20/16	\$1,230.65	Hillary Clinton	G2016
HSP Direct LLC	5/25/16	\$3,791.62	Hillary Clinton	G2016
HSP Direct LLC	5/25/16	\$428.25	Hillary Clinton	G2016
STMP	5/25/16	\$4,527.15	Hillary Clinton	G2016
Rite Envelope & Graphics	5/26/16	\$2,444.52	Hillary Clinton	G2016