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December 7, 2009

Andrea Needles
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Reply to your letter of November 4, 2009
CU-PVF FEC ID No. C00295527

Dear Ms. Needles:

Your letter of November 4, 2009, to Kevin Allen, Treasurer, Citizens United Political Victory Fund ("CU-PVF"), has been directed to my attention for reply on behalf of Mr. Allen and CU-PVF.

You have inquired about the Amended September 2009 Monthly FEC Report covering August 1, 2009 – August 31, 2009. Your letter states that the Amended Report discloses additional disbursements totaling \$22,588 on Line 21(b) of the Detained Summary Page, which were not disclosed on the original report. You request "clarifying information as to why this activity was not disclosed on the original report."

The amount to which you refer corresponds to a \$22,588.84 disbursement to InfoCision Management Corporation on August 27, 2009 for telemarketing services, which was inadvertently left off the original report. This error was discovered during preparation of the October 2009 Monthly FEC Report and promptly reported by way of the Amended Report, which also included an itemized listing of the InfoCision payment on Schedule B.

The InfoCision payment was not included on the original report due to human error resulting from a breakdown in the committee's safeguards aimed at preventing such mistakes. First, the check for the InfoCision disbursement was written near the end of August and did not clear the bank until September. Consequently, the payment did not show up in the bank statement covering August 2009. Second, the bookkeeper missed the payment during her initial reconciliation of the bank statement because the check was not entered into her accounting system until after the reconciliation had occurred. Third, in contradiction of the

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FEC Reports Analysis Division
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committee's standard practices, a copy of the check was not provided to me at the time of its issuance. Thus, it was not until the September 2009 bank statement arrived in mid-October that anyone realized the InfoCision payment had been left off the September Report. When the mistake was discovered during preparation of the October 2009 Monthly FEC Report, it was promptly corrected with the filing of the Amended September 2009 Monthly Report.

Since the Amended Report includes a complete itemized listing on Schedule B of the additional disbursement amounts listed on Line 21(b) of the Detailed Summary Page, we have determined that no further amendment to the report is required.

In closing, I note that CU-PVF strives for perfection in its FEC filings, and has in place policies aimed at preventing mistakes such as the one that occurred in September. Unfortunately, despite our best efforts mistakes sometimes occur due to human error. Please contact me if you should have any further questions relating to this matter. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Boos", with a long horizontal line extending to the right.

Michael Boos
Citizens United General Counsel

cc: Kevin Allen, Treasurer, CU-PVF

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