



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 15, 2017

BARBARA P. LAZARIS, TREASURER
SEAL PAC SUPPORTING ELECTING AMERICAN
LEADERS PAC
50 CONGRESS STREET, SUITE 318 C/O BARBARA P. LAZARIS
BOSTON, MA 02109

Response Due Date
06/19/2017

IDENTIFICATION NUMBER: C00570226

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2016 - 09/30/2016),
RECEIVED 04/11/2017

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 2 item(s):

1. Your amended report discloses an increase in disbursements totaling \$38,617.75 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. On Schedule B, you have disclosed disbursements to a federal candidate committee. Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, state of election, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state of election, office sought (House, Senate, or President), and district (if applicable). (11 CFR §104.3 (b)(3))

- Schedule B discloses an expenditure(s) for "MEDIA CONSULTING", "Direct Mail Program:Printing & Mailshop", "Direct Mail Program:Postage", "Direct Mail Program:Data Processing", "Direct Mail Program:Printing & Mailshop", "DIGITAL MARKETING SERVICES", "Direct Mail Program:Creative Fees" and, "Direct Mail Program:List Rental Expense". 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 in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate.

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Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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,

A handwritten signature in black ink, appearing to read "Romy Adame-Wilson". The signature is fluid and cursive, with a large initial "R" and a stylized "W" at the end.

Romy Adame-Wilson
Senior Campaign Finance Analyst
Reports Analysis Division