



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 25, 2016

VINCENT DEVITO, ESQ., TREASURER  
SEAL PAC SUPPORTING ELECTING AMERICAN  
LEADERS PAC  
ONE INTERNATIONAL PLACE - 44TH FL. C/O BOWDITCH & DEWEY, LLP  
BOSTON, MA 02110

**Response Due Date**  
**09/29/2016**

IDENTIFICATION NUMBER: C00570226

REFERENCE: AMENDED APRIL QUARTERLY REPORT (01/01/2016 - 03/31/2016),  
RECEIVED 05/11/2016

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 2 item(s):

1. Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and other political committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your filings. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions) Further, please amend your report to disclose these contributions on the proper line.
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, and district. (11 CFR §104.3 (b)(3))

- Your committee has previously indicated that it has been using "best efforts" to obtain the full name, mailing address, occupation and name of employer for each contributor; however, this report discloses a significant increase in the number of entries that lack this information. Please amend your report to

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provide the omitted information or provide an explanation of your efforts in this regard. (11 CFR §§104.3(a)(4)(i) and 104.7)

- Schedule B discloses an expenditure(s) for "PRINTING & MAILSHOP", "POSTAGE", and "FUNDRAISING MAIL." 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. 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.

- For your information and consideration when preparing future filings, Schedule B supporting Line 23 of your report discloses contributions to federal candidates for which no election designation has been provided. Commission regulations encourage committees making contributions to federal candidates to designate their contributions in writing for a particular election. Contributions not designated for a particular election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include election designation(s) if applicable.

**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.

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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 distinct "W" at the end.

Romy Adame-Wilson  
Senior Campaign Finance Analyst  
Reports Analysis Division

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