



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 24, 2017

DAN BACKER, TREASURER
STOP HILLARY PAC
203 SOUTH UNION STREET STE 300
ALEXANDRIA, VA 22314

Response Due Date

02/28/2017

IDENTIFICATION NUMBER: C00544767

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2016 - 09/30/2016)

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. Schedule D supporting Line 10 discloses a debt owed to "Campaign Solutions" incurred during the reporting period. Memo text attached to the entry states "IE disseminated in September. Late arriving invoice paid next period." However, no corresponding MEMO entries were provided on Schedule E supporting Line 24 for apparent independent expenditures.

Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy. (11 CFR §104.4)

2. Schedule E supporting Line 24 of your October Quarterly Report (7/1/16 - 9/30/16) discloses apparent independent expenditures made in opposition to "HILLARY CLINTON" during a prior reporting period. However, neither a memo Schedule E nor a Schedule D supporting Line 10 have been provided on that prior report. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E

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when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report(s) to clarify this apparent discrepancy. (11 CFR §104.4)

3. Schedule E of your report indicates that your committee may have failed to timely 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))

4. Your committee has filed a 48-hour report for an independent expenditure opposing Hillary Clinton (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48-hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

5. Your committee filed 48-hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "CAMPAIGN SOLUTIONS," "INFOCISION MANAGEMENT CORPORATION," "MDS COMMUNICATIONS" and "POLITICAL LIST BROKERS LLC" as the payee(s). However, the amounts and dates of public dissemination disclosed on these reports do not appear to correlate with the

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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. 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) 694-1157.

Sincerely,



Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Late 48 Hour Report (Schedule E)
Stop Hillary PAC (C00544767)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
INFOCISION MANAGEMENT CORPORATION	8/1/16	\$1,645.88	HILLARY CLINTON	G2016	8/17/16

Missing Schedule E (48 Hour Report)
Stop Hillary PAC (C00544767)

Name of Payee	Dissemination Date	Amount	Candidate	Election
AMERICAN ACTION NEWS	7/18/16	\$1,250.00	HILLARY CLINTON	G2016
AMERICAN ACTION NEWS	8/2/16	\$2,500.00	HILLARY CLINTON	G2016
AMERICAN ACTION NEWS	9/1/16	\$2,500.00	HILLARY CLINTON	G2016