



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 3, 2018

ZACHARY BASS, TREASURER
HEROES UNITED PAC, DBA VOLUNTEER
FIREFIGHTERS ASSOCIATION, DBA
ASSOCIATION OF POLICE & FIRST
RESPONDERS
1629 K ST N.W. SUITE 300
WASHINGTON, DC 20006

Response Due Date
07/09/2018

IDENTIFICATION NUMBER: C00647701

REFERENCE: APRIL QUARTERLY REPORT (01/01/2018 - 03/31/2018)

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 enforcement action.** Additional information is needed for the following 1 item(s):

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Donor Outreach." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

- Schedule B of your report discloses an expenditure(s) for "Media." For your information and consideration when preparing future filings, 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 independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

HEROES UNITED PAC, DBA VOLUNTEER FIREFIGHTERS ASSOCIATION, DBA
ASSOCIATION OF POLICE & FIRST RESPONDERS

Page 2 of 2

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) 694-1133.

Sincerely,



Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division