



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 4, 2018

GREG SPEED, TREASURER  
PRIORITIES USA ACTION  
1150 18TH ST NW STE 750  
WASHINGTON, DC 20036

**Response Due Date**  
**10/09/2018**

IDENTIFICATION NUMBER: C00495861

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 2 item(s):

1. Your committee filed a 48 hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Bully Pulpit Interactive LLC" as the payee(s). However, the amounts disclosed on these reports do not appear to correlate with the 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)
2. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of "DONNELLY, JOSEPH S HAWLEY," and "JOSHUA DAVID" during this reporting period. However, a Schedule D supporting Line 10 has not been provided. 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)


PRIORITIES USA ACTION

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) 694-1180.

Sincerely,



Nicholas Tarone  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Missing Schedule E (48 Hour Report)**  
**Priorities USA Action (C00495861)**

<b>Name of Payee</b>	<b>Dissemination Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
Bully Pulpit Interactive LLC	2/23/18	\$850.00	DONNELLY, JOSEPH S	P2018
Bully Pulpit Interactive LLC	2/23/18	\$1,000.00	MCCASKILL, CLAIRE	P2018

**Missing 48 Hour Report (Schedule E)**  
**Priorities USA Action (C495861)**

<b>Name of Payee</b>	<b>Dissemination Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
Bully Pulpit Interactive LLC	2/23/18	\$2,875.00	MCCASKILL, CLAIRE	P2018
Bully Pulpit Interactive LLC	2/23/18	\$2,725.00	DONNELLY, JOSEPH	P2018