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May 22, 2013

Brian Jones
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street Washington, DC 20463

Re: Citizens United Political Victory Fund, FEC ID No. C00295527
Response to your letter dated April 17, 2013 regarding the amended Pre-General Report covering October 1, 2012 ?
October 17, 2012.

Dear Mr. Jones:

In your letter you request further explanation regarding the increase in certain categories of receipts and certain categories of disbursements reported on the amended Pre-General Report as compared to the initial Pre-General Report.

The committee's records indicate that there was no change in the amount of receipts reported. The initial and amended reports, reported total receipts of \$90,162.00.

The bulk of the increase in disbursements was a single payment to InfoCision Management Corporation on October 11, 2012 in the amount of \$18,982.81, which was for a membership communication. The remainder of the increase in disbursements was for bank service charges and merchant service fees. Without the benefit of the October 2012 bank statement, the payment to InfoCision Management Corporation was inadvertently overlooked until after the initial Pre-Election Report had been filed. As to the other changes in disbursements, the precise amounts disbursed for bank service charges and merchant services fees relating to credit card receipts are generally not available to the committee until it receives its monthly bank statements. The committee strives to file accurate and complete reports, and bank statements are a key cross reference in the process. Unfortunately, due to the dates covered by the Pre-Election Report, bank statements reflecting the covered transactions were not available until after the reporting deadline.

Please feel free to contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,

Michael Boos
Citizens United Vice President
& General Counsel