



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 14, 2016

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

**Response Due Date**

**05/19/2016**

IDENTIFICATION NUMBER: C00544767

REFERENCE: AMENDED YEAR-END REPORT (07/01/2015 - 12/31/2015), RECEIVED  
02/21/2016

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. Your amended report discloses an increase in disbursements totaling \$163,732.16 and an increase in debts owed to one or more vendors totaling \$36,611.75 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Schedule E, supporting Line 24 of your report, discloses several independent expenditures made in support of federal candidates which have been designated for "C2016, Dem. Nat. Convention." The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please be advised that each State's Presidential primary is considered a separate election for purposes of aggregating independent expenditures. Advisory Opinion 2003-40. Please amend Schedule E by providing the state of election. (11 CFR §104.3(b)(3)(vii))
3. Your committee filed a 48 hour report informing the Commission of

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independent expenditures made in support or opposition of federal candidates with "CD Inc." as the payee(s) disseminated on 9/2/15. However, the election disclosed on this report does not appear to correlate with the entry on Schedule E, supporting Line 24 for the reporting period. If your committee has filed a 48 hour report supporting an independent expenditure not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose this payment. Please amend your report to clarify this discrepancy and provide further information concerning these reports. (11 CFR §104.4)

4. 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))

5. Schedule E discloses Calendar Year-To-Date Per Election total(s) for the 2016 Presidential General and 2016 Iowa Democratic Primary elections which appear to be incorrect. Please amend your report to provide the correct total(s) on Schedule E. (52 U.S.C. §30104(b)(4) (formerly 2 U.S.C. §434(b)(4)) and 11 CFR §104.4(f))

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, other federal operating expenditures should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

- Schedule B of your report discloses an expenditure(s) for "Carey account -

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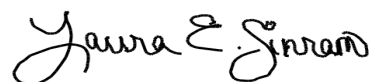
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Advocacy and online communications services," "CAREY ACCOUNT - COMMUNICATIONS SERVICES," "Carey account - Digital advertising," "CAREY ACCOUNT - MEDIA SERVICES" and "CAREY ACCOUNT - POSTAGE AND SUPPLY COSTS FOR MAILERS." For your information and consideration 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.

**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) 694-1157.

Sincerely,



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

**Late 48 Hour Report (Schedule E)**  
**STOP HILLARY PAC (C00544767)**

<b>Name of Payee</b>	<b>Dissemination Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>	<b>Report Received</b>
Allegiance List Marketing	8/10/15	\$8,625.00	HILLARY RODHAM CLINTON	G2016	11/5/15
The Washington Times	8/10/15	\$1,576.00	HILLARY RODHAM CLINTON	G2016	2/21/16
Campaign Solutions	10/1/15	\$8,598.00	HILLARY RODHAM CLINTON	G2016	2/21/16
Media Bridge, LLC	10/1/15	\$438.75	HILLARY RODHAM CLINTON	G2016	2/21/16
The Rainmakers	10/1/15	\$2,620.20	HILLARY RODHAM CLINTON	G2016	2/21/16
Media Bridge, LLC	11/3/15	\$1,242.00	HILLARY RODHAM CLINTON	G2016	2/21/16
Campaign Solutions	12/1/15	\$2,924.59	HILLARY RODHAM CLINTON	G2016	2/21/16
MediaDC	12/1/15	\$440.05	HILLARY RODHAM CLINTON	G2016	2/21/16