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March 6, 2012

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

Identification Number: C00295527

Reference: Reply to your January 31, 2012 correspondence concerning CU-PVF's Amended Monthly Report covering November 1, 2011 ? November 30, 2011

Dear Mr. Jones:

I write in reply to your letter dated January 31, 2012, to Kevin Allen, Treasurer of Citizens United Political Victory Fund (?CU-PVF?), requesting additional information regarding CU-PVF's December Monthly Report, which covers the period November 1, 2011 through November 30, 2011. Your letter requests clarification of missing or incomplete occupation and/or employer information for several of the contributions disclosed in Schedule A. You request that CU-PVF either (a) file an amended report providing the missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's ?best efforts? requirements for obtaining the contributor identifier information required to be disclosed.

CU-PVF is not filing an amended report at this time because (1) the information disclosed on the report is either the information that the contributor provided to CU-PVF or a statement indicating that the information has been requested from the contributor pursuant to the Commission's ?best efforts? requirements, and (2) , as set for below, CU-PVF's treasurer believes that the procedures CU-PVF has adopted for obtaining and disclosing the identity of its contributors fully complies with the Commission's ?best efforts? requirements.

These procedures have been outlined in earlier communication filed with the Commission; however, we re-state them as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g. direct mail) a response form is included listing the contributor's name and address as it appears in Citizens United's membership records. The form includes a request that the contributor correct any inaccurate or missing information. The form also asks that the contributor provide his or her occupation and employer. For oral solicitations (e.g. telemarketing), the request is made orally as part of the solicitation script. In either case, the request includes a statement that Federal law requires CU-PVF to use its best efforts to obtain and report the required information for any person who contributes in excess of \$200 in a calendar year.

Second, a follow-up letter acknowledging the contribution is promptly mailed to each contributor requesting the required information. This letter is to be mailed within 30 days of receipt of a contribution and advises the contributor that Federal law requires CU-PVF to use best efforts to obtain the required information from all persons who contribute in excess of \$200 in a calendar year. The follow-up letter includes a form for providing the information. Enclosed with the follow-up letter and form is a pre-addressed envelope for returning the completed

A-G79 @ B9CI G'H9LH'fl 97 : cfa ' - - Ł

form to CU-PVF.

Third, if a contributor returns the completed form prior to the deadline for completing the FEC Report for which the information is required to be disclosed, the information is included in the initial report. If the information is provided subsequent to the filing of the initial report, it is CU-PVF's policy to file an amended report disclosing the newly obtained information on or before the due date for the next regularly scheduled report.

CU-PVF believes that the procedures described above (and in the past) fully conform with both the letter and spirit of the Commission's "best efforts" requirements. However, if you believe there is a deficiency in the process, please let me know so that we can discuss any steps necessary to rectify the matter.

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

Sincerely,

Michael Boos  
Vice President & General Counsel  
Citizens United

cc: Kevin Allen, Treasurer, CU-PVF

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