



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 29, 2017

Michael Boos
Citizens United
1006 Pennsylvania Ave, SE
Washington, DC 20003

Re: ADR 837 (RAD 17L-07)
Citizens United Super PAC LLC and Lauren Catts, Treasurer

Dear Mr. Boos:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by Citizens United Super PAC LLC which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Citizens United Super PAC LLC and Lauren Catts, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

Summary of Case: RAD referred 837 Citizens United Super PAC LLC and Lauren Catts, Treasurer (Respondents or the Committee) for two reporting issues. The Committee failed to dispose all financial activity on its 2016 April Quarterly Report, filing an amended report on April 29, 2016, which disclosed additional receipts totaling \$115,469.77. Additionally, the Committee failed to file two 48-Hour Reports totaling

\$76,664.32 to support eighty-three (83) independent expenditures disclosed on the 2016 April Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on September 22, 2016, stating that the increased activity on the 2016 April Quarterly Report was due to "clerical errors made during the data import process." The Committee also explained in the Form 99 that the missing 48-Hour Reports were caused by a direct vendor who "failed to follow established protocol requiring that firm to advise the committee in advance of each mailing of the date of the mailing and estimated cost of the mailing."

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 837**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

Krista J. Roche

Krista J. Roche
Acting Director
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions
Commitment to Submit to ADR & Designation of Representative/Counsel