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NAME OF COMMITTEE (In Full)

Cummins Inc. Political Action Committee (CIPAC)

FEC IDENTIFICATION NUMBER

C00377952

Mailing Address 601 Pennsylvania Avenue, NW
North Building Suite 1100N

City	State	ZIP Code
Washington	DC	20004

September 9, 2021

Nicholas Tarone
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Mr. Tarone:

This submission responds to your August 8, 2021 Request for Additional Information ("RFAI") regarding the Cummins Inc. Political Action Committee's (the PAC) Amended 2021 June Monthly Report. The RFAI requests clarification regarding receipts from Cummins Inc. totaling \$5,102.00.

On May 26, 2021, funds were inadvertently deposited into the PAC's bank account due to a processing error. In May, the Cummins employee whose responsibility it was to transfer the PAC's payroll deductions from the corporation to the PAC's bank account left the company. The employee's departure was unknown to the administrators of the PAC and, unfortunately, the employee neglected to provide any instructions to the individual who took over responsibility of transferring funds to the PAC. As a result, on May 26, 2021, the new employee mistakenly transferred funds from the Cummins general treasury account to the PAC.

Funding inconsistencies were discovered at the beginning of July during the monthly bank reconciliation of the PAC's account and an internal investigation commenced. An internal audit of the preceding months' deposits was conducted and confirmed that the payroll department mistakenly deposited funds into the PAC's account on May 26, 2021. The audit further uncovered that the payroll deposit made on June 7, 2021 included an additional \$298.46 in general treasury funds.

Upon determining the source of the excess funds that were deposited into the PAC's bank account, the PAC took corrective action by amending the 2021 June Monthly to disclose the deposit of these funds in the amount of \$5,102.00. These funding inconsistencies impacted two reporting periods and the \$298.46 overage referenced above is reported in the 2021 July Monthly report. A check was issued on July 19, 2021 from the PAC to Cummins Inc. in the amount of \$5,400.46, reimbursing the corporation for the full amount of the funds that were mistakenly deposited into the PAC's account. The check was presented for payment on August 4, 2021 and the refund check from the PAC to Cummins Inc. was disclosed on Line 28a of the 2021 August Monthly report.

None of the corporate funds deposited into the PAC's account were used to make any disbursements. Cummins is committed to upholding the highest standards of compliance and has improved documentation and training of the payroll funding operation to ensure the PAC's payroll deductions are processed and funded in a timely and compliant manner.

If you have any additional questions regarding this matter, please feel free to contact me.

Sincerely,

Traci Kraus, Treasurer