

MISCELLANEOUS TEXT (FEC Form 99)

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October 4, 2012

Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Identification Number: C00483693

Re: June Monthly Report (05/01/2012-05/31/2012)

Dear Ms. Miller,

This response pertains to the letter sent on September 12, 2012 requesting additional information on the following items:

Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR ?104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 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))

The missing 24-hour report was the result of an inadvertent administrative error made by a former reporting staff member. Promptly upon determining through our periodic compliance reviews that a report had been missed inadvertently, staff filed the report. At the same time, we reviewed and updated our procedures and internal systems for tracking SCIA expenditures for reporting. We closely follow standard procedures for reporting to the Commission and strive to be in full compliance with FEC reporting requirements.

If you have any additional questions please contact Gayle Sheehan at (415) 977-5560.

Sincerely,

Cathy Duvall, Treasurer
Sierra Club Independent Action

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