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NAME OF COMMITTEE (In Full)  
People's Action

FEC IDENTIFICATION NUMBER  
C90016833

Mailing Address 1130 N Milwaukee Ave

City	State	ZIP Code
Chicago	IL	60642

The below responds to the Commission's Request for Additional Information dated May 11, 2020. People's Action is a 501(c)(4) social welfare organization that incidentally engages in independent expenditures supporting or opposing candidates for federal office, and is not a political committee under the Federal Election Campaign Act.

Regarding Item 1: People's Action has properly disclosed contributions raised for "political purposes" during the calendar quarter, as per CREW v. FEC and the Commission's subsequent guidance (from October 4, 2018). People's Action conducted a diligent search of solicitations made during the first calendar quarter, and reported contributions that were received consistent with the opinion and FEC guidance. No contributions were raised "for the purpose of furthering" independent expenditures. From this, the organization believes that no amendment is required.

Regarding Item 2: People's Action believes that it has properly disclosed contributors who gave for "political purposes." Since the organization raised less money "for political purposes" than it required to engage in its independent expenditure efforts, organizational funds not requiring disclosure were used to make up the remainder. As People's Action is not a "political committee," its contributions subject to disclosure are not required to balance with its expenditures regulated by the Act.

Additionally, People's Action will amend its April Quarterly Form 5 to remove contributions made to other 501(c)(4) organizations for political purposes, as those expenses are not "independent expenditures" and were not required to be originally reported. The recipients of these contributions would be required to report People's Action as a contributor to the extent that they engage in independent expenditures regulated by the Act.

People's Action believes that it has disclosed its contributors as above in the best interests of transparency and in full compliance with the Act, CREW v. FEC, and Commission guidance. If you have any questions regarding this response, please contact our counsel, David Mitrani of Sandler Reiff Lamb Rosenstein & Birkenstock, P.C., at mitrani@sandlerreiff.com.