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NAME OF COMMITTEE (In Full)  
Sierra Club Independent Action

FEC IDENTIFICATION NUMBER  
C00483693

Mailing Address 2101 Webster Street  
Suite 1300

City State ZIP Code  
Oakland CA 94612

4/13/2021

Romy Adame-Wilson  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Identification Number: C00483693

Re: AMENDED OCTOBER MONTHLY REPORT (09/01/2020 - 09/30/2020), RECEIVED 10/21/2020

To: Romy Adame-Wilson:

This memo pertains to the letter sent on March 9, 2021 requesting additional information on the following items:

- 1) ?Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR ? 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR ? 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Information Requested / Information Requested" and "Self / Business Owner."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedure??

Sierra Club Independent Action has a standing practice of requesting employer and occupation information in the original solicitation as well as sending "best efforts" letters every month to donors requesting that they complete their missing information. Our printed letters (accompanied by return envelope) follow this format:

?Thank you for your contribution to the Sierra Club Independent Action (SCIA), we appreciate your support! Federal law requires political committees to report the name, mailing address, occupation and name of employee for each individual who contributes more than \$200 in a calendar year. Your accumulated year to date contribution totals \$\_\_\_\_\_, with the last contribution made on mm/dd/year.

Please help us comply with that requirement by providing the information requested below and returning this letter in the envelope provided. If you have no employer and are retired or self-employed etc., please state so.

Employer's name or principal place of business: \_\_\_\_\_  
Occupation: \_\_\_\_\_

SCIA is a political committee. Unless otherwise notified, 100% of your contribution will be applied to your contribution limit under federal law. Contributions to SCIA are entirely voluntary.

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SCIA cannot accept from individuals who are not United States citizens or permanent residents.

Again, thank you for your support of Sierra Club Independent Action.?

The best efforts letters for donations made between 9/1/2020-9/30/2020 had already been mailed by the time that we received this inquiry by the Commission. When donor responses arrive by mail, we promptly update their information in our EveryAction program and submit appropriate memo entries on line 11(a). We are currently preparing to update contribution information with our next monthly filing. Sierra Club Independent Action will continue to implement our long-standing Best Efforts practice.

-2) ?Schedule E of your report indicates that your committee may have failed to timely one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR ?104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 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 late 48 hour report on attachment page 1 was the result of an inadvertent administrative error made by the reporting staff member. The expenditure was caught and reported immediately when discovered. While other staff time and expenses were timely reported as independent expenditures on the appropriate 48 hour report, these expenses were not promptly recorded and submitted to the reporting staff member, which delayed reporting.

We reviewed and updated our reporting procedures and internal systems for tracking Sierra Club Independent Action expenditures to ensure all expenditures are reported and additional safeguards are in place.

If you have any additional questions please contact Assistant General Counsel, Director of Compliance Dave Thack at (248) 635-7315.

Sincerely,  
Laurin Asdal  
Sierra Club Independent Action