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October 9, 2015

Sarah Juris  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Identification Number: C00483693

Re: AMENDED JULY MONTHLY REPORT (06/01/2015 - 06/30/2015), RECEIVED 08/20/2015

Dear Ms. Juris,

This response pertains to the letter sent on September 13, 2015 requesting additional information on the following items:

-Your amended report discloses an increase in receipts totaling \$25,399.32 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR ?104.3)

The Commission notes the memo text attached to your report stating,

"This amendment includes the updated staff salaries & benefits expenses that had not been recorded by our system as of our last monthly filing date. They are shown on line 21 with matching offsets. It also includes a refund for overpayment for media buys that occurred last year but the refund check did not arrive in our mail until after our July 20 Monthly filing."

Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR ?104.3

The \$25,399.32 is a refund from Waterfront Strategies for the excessive payment for an ad buy that occurred in 2014 opposing Joni Ernst for Iowa Senate. The expense was initially reported in our October 20 Monthly 3X report with a date of 9/30/2014. This year, we received a check in August for \$25,399.32 from Waterfront Strategies dated 6/29/2015, out of the originally \$1,000,000.00 that we reported last year, which did not arrive in our mail until our original July 20 Monthly filing had already been submitted. The vendor did not notify us of their intent to issue a refund prior to sending us the check, so we had no knowledge of it during the initial July 20 Monthly reporting period. Once we received the check in August, we promptly submitted an amendment to the July 20 Monthly report to include the refund on line 24.

The amended report also included salaries & benefits expenses that had not been submitted by staff in our timekeeping system at the time of our original report filing (\$17.05 in addition to the original \$85.28 reported on 6/15, and \$119.39 on 6/30. We discovered this administrative oversight in a routine review of staff time sheets and immediately amended the July Monthly Report to reflect that update.

If you have any additional questions please contact Dave Thack at (202) 675-2395.

Sincerely,

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Sarah Hodgdon, Treasurer  
Sierra Club Independent Action

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