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August 28, 2017

JAMES C. FISH, JR., TREASURER
WASTE MANAGEMENT EMPLOYEES BETTER
GOVERNMENT FUND
701 PENNSYLVANIA AVE., NW SUITE 590
WASHINGTON, DC 20004

Response Due Date 10/02/2017

**IDENTIFICATION NUMBER: C00119008** 

REFERENCE: AUGUST MONTHLY REPORT (07/01/2017 - 07/31/2017)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in enforcement action. Additional information is needed for the following 1 item(s):

- 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 attached employer name and occupation entries appear on your report and are not considered acceptable.

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 procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

## WASTE MANAGEMENT EMPLOYEES BETTER GOVERNMENT FUND

Page 2 of 3

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1169.

## WASTE MANAGEMENT EMPLOYEES BETTER GOVERNMENT FUND

Page 3 of 3

Sincerely,

Kevin Fortkiewicz

Sr. Campaign Finance & Reviewing Analyst

Reports Analysis Division

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322

## Inadequate Employer/Occupation Entries Waste Management Employees Better Government Fund (C00119008)

Employer	Occupation
Auto Created Organization	Area Controller II
Auto Created Organization	Area Dir Disposal Ops
Auto Created Organization	Area Dir Disposal Ops Gas-Elec
Auto Created Organization	Area Dir Diversion Strategies
Auto Created Organization	Area Director - Fleet
Auto Created Organization	Area Director Collection Ops
Auto Created Organization	Area Dir Public Sctr Soltns
Auto Created Organization	Area Dir Sales
Auto Created Organization	Area Mgr Fleet I
Auto Created Organization	Area Mgr Public Sctr Soltns II
Auto Created Organization	Area Mgr Safety II
Auto Created Organization	Area Sr Mgr Pub/Govt Affairs
Auto Created Organization	Dir Commodity Sales
Auto Created Organization	Dir CSMG
Auto Created Organization	Dir Disposal Ops
Auto Created Organization	Dir Environmental Protection
Auto Created Organization	Dir Gas Operations
Auto Created Organization	Dir Government Affairs
Auto Created Organization	Dir IT II
Auto Created Organization	Dir Learning & Development
Auto Created Organization	Dir Market Plan & Landfill Dev
Auto Created Organization	Dir Public Affairs
Auto Created Organization	Dir Public Affairs&Reg Issues
Auto Created Organization	Dir Security
Auto Created Organization	District Mgr II - Disposal
Auto Created Organization	Engineer III
Auto Created Organization	EVP & Chief Operating Officer
Auto Created Organization	Financial Analyst III
Auto Created Organization	Financial Analyst Sr
Auto Created Organization	MA Gas Operations Manager II
Auto Created Organization	Major Account Manager
Auto Created Organization	Mgr Communications
Auto Created Organization	Mgr Engineering
Auto Created Organization	Mgr Environmental Protectn II
Auto Created Organization	Mgr Improvement & Analysis II
Auto Created Organization	Mgr Maintenance (Closed Sites)
Auto Created Organization	Mgr MSQA II
Auto Created Organization	Mgr Ops Improvement II (MA)
Auto Created Organization	Mgr Outside Sales

## Inadequate Employer/Occupation Entries Waste Management Employees Better Government Fund (C00119008)

Employer	Occupation
Auto Created Organization	Mgr Sourcing WMRA
Auto Created Organization	President and CEO
Auto Created Organization	Public Sector Sales Rep III
Auto Created Organization	Routing Analyst (MA)
Auto Created Organization	Sr Dir Strategic Accounts
Auto Created Organization	Sr District Mgr - Collection
Auto Created Organization	Sr District Mgr - Disposal
Auto Created Organization	Sr Legal Counsel
Auto Created Organization	Sr Mgr Engineering
Auto Created Organization	Sr Mgr Public Affairs
Auto Created Organization	VP- Environmental Mgmnt Group
Auto Created Organization	VP Area
Auto Created Organization	VP Business Development
Auto Created Organization	VP Business Partner - Ops
Auto Created Organization	VP Collections & Fleet Ops
Auto Created Organization	VP Comm & Community Rel
Auto Created Organization	VP Corp Venturing&New Products
Auto Created Organization	VP Federal Public Affairs
Auto Created Organization	VP General Counsel
Auto Created Organization	VP Renewable Energy
Auto Created Organization	VP Sales Optimization
Auto Created Organization	VP State Public Affairs