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March 13, 2013

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

Identification Number: C00135368

Re: Amended 12 Day Pre-General Report (10/01/2012-10/17-2012), Received 1/31/2013

To Mr. Jones:

This memo pertains to the letter sent on February 27, 2013 requesting additional information on the following items:

1. Your amended report discloses an increase in disbursements totaling \$10,500 on Lines 21(b), 23, and 28(a) of the Detailed Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR ? 104.3)

An amendment to the original 12 Day Pre-General Report was submitted on 1/31/2013 with the following memo text explaining the changes made to the new report:

"The 12 day Pre-General report is being amended to reflect the financial changes as the result of amendments made to the July 20 Monthly, August 20 Monthly, September 20 Monthly, and October 20 Monthly reports. As of January 31, 2013, the following additional changes have been made: A direct contribution of \$500 made to the Committee to Re-Elect Linda Sanchez that was not imported correctly at the time of the initial filing has been added to the amended report. Offset reported in line 21b related to expenses in line 24 was updated to match. Two additional staff member's 'salaries & benefits' are added to the Pre-General amendment to reflect updated information. Subsequent changes to the line 24 offsets are reflected on line 21(b). The amended report also contains a new line 28 refund made to Mrs. Walter F. Brissenden to correspond with the contribution refund request listed on 8/30/2012."

On January 31, 2013, we submitted an amended report to make the following changes: (1) "In-kind: salaries & benefits" expenses for Rachel Huennekens and Phil Compton for the pay period ending 10/15/2012 were added to line 23 of the amended report. Their staff time and expenses were correctly accounted for both in our budget and in the in-kind contribution letters we sent to the candidates' campaign committees, but were not itemized on line 23 due to the reporting staff's administrative oversight in an atypically busy political reporting season; (2) A \$500 contribution made to the Committee to Re-Elect Linda Sanchez was not disclosed on our original report due to a computer program error that caused the incomplete import of our total direct contribution disbursements into FECfile. We are working with our IT staff to identify and fix the internal systems errors; (3) A refund requested on 8/30/2012 to Mrs. Walter Brissenden for \$1300 was added on 10/1/2012 to line 28 of the amended report. In addition, all changes made to line 23 and 24 expenses are reflected on the updated line 21(b) of the amended report.

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

Sincerely,

Debbie Sease

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Sierra Club Political Committee

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