



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 13, 2021

MATT J. GRAY, TREASURER
BIOGEN, INC. POLITICAL ACTION
COMMITTEE A.K.A. 'BIOGEN PAC'
225 BINNEY STREET
CAMBRIDGE, MA 02142-1031

Response Due Date
05/18/2021

IDENTIFICATION NUMBER: C00390351

REFERENCE: AMENDED YEAR-END REPORT (11/24/2020 - 12/31/2020), RECEIVED
03/25/2021

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 an audit or 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.

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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 information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1180.

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Sincerely,

A handwritten signature in black ink that reads "Nicholas Tarone". The script is cursive and fluid, with the first name "Nicholas" and last name "Tarone" clearly distinguishable.

Nicholas Tarone
Senior Campaign Finance Analyst

Inadequate Employer/Occupation Entries**Biogen, Inc. Political Action Committee a.k.a. 'Biogen PAC' (C00390351)**

Employer	Occupation
INFORMATION REQUESTED PER BEST EFFORTS	INFORMATION REQUESTED PER BEST EFFORTS
INFORMATION REQUESTED PER BEST EFFORTS	DIRECTOR, COMMERCIAL OPERATIONS
INFORMATION REQUESTED PER BEST EFFORTS	ALZHEIMER'S ACCOUNT LIAISON, PHOENIX
INFORMATION REQUESTED PER BEST EFFORTS	DIRECTOR, STATE PUBLIC POLICY & GOVERN
INFORMATION REQUESTED PER BEST EFFORTS	SR TERRITORY BUSINESS MANAGER
INFORMATION REQUESTED PER BEST EFFORTS	ASSOC DIRECTOR, TC&S, QUALITY, PROCESS
INFORMATION REQUESTED PER BEST EFFORTS	SR DIRECTOR, FEDERAL EXECUTIVE BRANCH
INFORMATION REQUESTED PER BEST EFFORTS	VP, PUBLIC POLICY & GOVERNMENT AFFAIRS
INFORMATION REQUESTED PER BEST EFFORTS	EVP, PHARMACEUTICAL OPERATIONS & TECHN
INFORMATION REQUESTED PER BEST EFFORTS	DIRECTOR, FEDERAL GOVERNMENT AFFAIRS
INFORMATION REQUESTED PER BEST EFFORTS	VP, US COMMERCIAL EXCELLENCE AND OPERA
INFORMATION REQUESTED PER BEST EFFORTS	REGIONAL SALES DIRECTOR, KENTUCKY / IN
INFORMATION REQUESTED PER BEST EFFORTS	EVP, HUMAN RESOURCES
INFORMATION REQUESTED PER BEST EFFORTS	ASSOC DIRECTOR, INFORMATION TECHNOLOGY
INFORMATION REQUESTED PER BEST EFFORTS	SVP, CHIEF INFORMATION OFFICER
INFORMATION REQUESTED PER BEST EFFORTS	DIRECTOR, FEDERAL EXECUTIVE BRANCH STR
INFORMATION REQUESTED PER BEST EFFORTS	ALZHEIMER'S ACCOUNT LIAISON, CINCINNAT
INFORMATION REQUESTED PER BEST EFFORTS	PRINCIPAL ENGINEER, TECHNICAL DEVELOPM
INFORMATION REQUESTED PER BEST EFFORTS	SALES LEARNING
INFORMATION REQUESTED PER BEST EFFORTS	HEAD, CLINICAL PHARMACOLOGY & PHARMAC
INFORMATION REQUESTED PER BEST EFFORTS	NATIONAL DIRECTOR, THOUGHT LEADER LIAI

Inadequate Employer/Occupation Entries**Biogen, Inc. Political Action Committee a.k.a. 'Biogen PAC' (C00390351)**

Employer	Occupation
INFORMATION REQUESTED PER BEST EFFORTS	HEAD, PRECLINICAL SAFETY
INFORMATION REQUESTED PER BEST EFFORTS	ASSOCIATE DIRECTOR, STATE GOVERNMENT A
INFORMATION REQUESTED PER BEST EFFORTS	ASSOCIATE DIRECTOR, FEDERAL EXECUTIVE
INFORMATION REQUESTED PER BEST EFFORTS	ALZHEIMER'S ACCOUNT LIAISON, LAS VEGAS
INFORMATION REQUESTED PER BEST EFFORTS	SVP OF BIOTHERAPEUTIC AND MEDICINAL SC
INFORMATION REQUESTED PER BEST EFFORTS	EVP, GLOBAL PRODUCT STRATEGY & COMMERC
INFORMATION REQUESTED PER BEST EFFORTS	DIRECTOR, PUBLIC POLICY & GOVERNMENT A
INFORMATION REQUESTED PER BEST EFFORTS	CHIEF R&D & OPERATIONS COUNSEL
INFORMATION REQUESTED PER BEST EFFORTS	ASSOC DIRECTOR, PUBLIC POLICY & GOVERN