

October 2, 2014

Chairman Lee E. Goodman  
Federal Election Committee  
999 E St., NW  
Washington, DC 20463

Dear Chairman Goodman:

I want to bring to your attention a potentially serious violation of Federal election laws involving the Sierra Club Independent Action, a Super Pac of the Sierra Club.

During the 2012 election cycle, the Sierra Club contributed a total of \$700,000 in cash to its Super PAC, \$640,000 of this coming in one lump sum on September 30, 2012, according to their FEC disclosure filings. Its total individual contributions for the entire 2012 cycle was \$1,220,969, meaning that 57% of the Super PAC's total receipts came from the Sierra Club itself, and 52% of the total for the entire cycle was transferred from the Sierra Club to their Super PAC within weeks of the November 2012 elections.

In its latest Federal Election Committee disclosure (August 31, 2014), the Sierra Club Independent Action reported raising only \$23,451.88 since January 1, 2014, and the group had less than \$50,000 Cash on Hand. On September 18, 2014, the Sierra Club announced in a press release that it's Super PAC, the *Sierra Club Independent Action*, "bought nearly \$1 million worth of television airtime in Iowa, in a strong push to defeat Republican State Senator Joni Ernst."

Therefore, in order to pay for its mid-September advertisement buy, the Sierra Club Independent Action had to receive at least \$950,000 in contributions, and if 2012 provides any clues, some or most of this likely came from the Sierra Club itself.

We believe that this type of action by the Sierra Club warrants an examination. By waiting until so late in the election cycle to funnel money to their Super PAC, and at least in 2012, nearly half of their total contributions came in one large sum on the last day of September, the net effect is that donors providing money to the Sierra Club are being shielded when this transfer comes into the Super PAC. This certainly is not in the spirit of the Federal financial disclosure laws governing elections.

Sincerely,



David W. Schnare  
General Counsel