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2016 AUG 31 PM 6:29

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August 31, 2016

Via email
(JJORDAN@FEC.GOV
&DRAWLS@FEC.GOV)

Mr. Jeff S. Jordan, Assistant General Counsel
Attn: Donna Rawls, Paralegal
Office of Complaints Examination and Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 7101

Dear Mr. Jordan:

In July, the Federal Election Commission ("FEC") notified my client, Mountaire Corporation, by letter of a complaint filed by Free Speech for People and Campaign for Accountability against ten "super PACs." While Mountaire Corporation is not named as a target of the complaint, its name does appear once in the document as someone who contributed to PAC Freedom Partners Action Fund, Inc. The complaint does not accuse Mountaire Corporation of any wrongdoing; so, it is unclear why the FEC sent a letter to Mountaire Corporation.

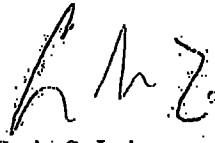
Any contribution by my client was made in full compliance with federal campaign finance laws, as interpreted by both the FEC and the federal courts. *See, McCutcheon v. FEC*, 572 U.S. ___, nt. 2 (2014) ("A so-called 'Super PAC' is a PAC that makes only independent expenditures and cannot contribute to candidates. The base and aggregate limits govern contributions to traditional PACs, but not to independent expenditure PACs."); *See, also* Advisory Opinion 2010-11 (Commonsense Ten). The complaint acknowledges these authorities and recognizes that the super PAC's receipt of this contribution was permissible under existing law.

Accordingly, Mountaire Corporation should not be subject to enforcement proceedings for something that was not a violation of the campaign finance laws, particularly given that it is

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not accused of any wrongdoing in the complaint. The FEC should dismiss this matter as it relates to Mountaire Corporation.

Sincerely yours,



Craig S. Lair

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