

From: [Elena I. Paoli](#)
To: scarlough@dickinsonwright.com
Cc: [Lynn Tran](#); [Charles R. Spies](#)
Subject: MUR 7491 (American Ethane)
Date: Friday, October 04, 2019 1:00:00 PM
Attachments: [MUR 7491 \(American Ethane\).docx](#)

Hi, Sloane. In response to your request for written follow-up questions, attached are some of the questions we already posed, with the addition of two clauses in italics. We appreciate the Response you sent on August 30, 2019, but it fails to answer these questions. We may return to other issues I asked about on the phone Thursday, but the attached questions are more important at this point. If you would like to discuss, we are still open to talking with you. Thank you.

Elena

1. Describe the ownership and organizational structure of American Ethane Co., LLC, (“American Ethane”). Provide supporting documents. Identify all persons or entities that have been owners, members, and/or officers of American Ethane and their citizenship status, nationality, or immigration status. For all owners of American Ethane, describe their ownership interest in the company and any changes in that interest since the formation of American Ethane.

...

4. Describe the participation of other owners, officers, and employees, *including lobbyists and other third-parties*, in decisions regarding the decision to make contributions or expenditures in connection with any election. Provide copies of all documents, records, and communications related to Houghtaling’s, or any other American Ethane owner, member, director, officer, or employee’s role, *including lobbyists and other third-parties’ roles*, in connection with American Ethane’s election-related disbursements, including contributions.

5. Paragraph 6 of the Declaration of John Houghtaling, submitted with your October 30, 2018 Response, states that “[a]ll funds used by AEC to make political contributions were domestic funds, as derived through a loan secured by Houghtaling Enterprises, now referred to as H Ventures, a corporate entity in which I have a 100% ownership interest.”

- a. Describe the circumstances of the loan referenced in the Declaration, including the date of the loan, the terms and conditions of the loan, American Ethane’s treatment of the loan for accounting purposes, the repayment schedule for the loan, and whether American Ethane repaid the loan;
- b. Identify all owners, members, directors, officers, or employees of American Ethane who participated in the decision to accept the loan;
- c. Describe the business activities of Houghtaling Enterprises or H Ventures since January 1, 2018, and identify all persons or entities that have been owners, members, and/or officers of Houghtaling Enterprises or H Ventures;
- d. State whether Houghtaling, Houghtaling Enterprises, or H Ventures made any other loans or gifts of money to American Ethane and describe the circumstances of any such loan or gift; and
- e. Provide documents describing or memorializing the loan.