



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 3, 2021

BY ELECTRONIC MAIL ONLY

rgordon@perkinscoie.com
ereese@perkinscoie.com
sreulbach@perkinscoie.com

Rebecca H. Gordon, Esq.
Ezra W. Reese, Esq.
Shanna M. Reulbach, Esq.
Perkins Coie LLP
700 Thirteenth Street, NW
Suite 600
Washington, DC 20005

RE: MUR 7512
Pembina Pipeline Corporation
Fort Chicago Holdings, II US, LLC
Jordan Cove LNG, L.P.
Jordan Cove LNG, LLC
Jordan Cove Energy Project L.P.
Jordan Cove LNG LLC PAC and
Allison Murray in her official
capacity as treasurer

Dear Mmes. Gordon and Reulbach and Mr. Reese:

On October 19, 2018, and November 8, 2018, the Federal Election Commission notified your clients, Pembina Pipeline Corporation, Fort Chicago Holdings, II US, LLC, Jordan Cove LNG, L.P., Jordan Cove LNG, LLC, Jordan Cove Energy Project L.P., and Jordan Cove LNG LLC PAC and Allison Murray in her official capacity as treasurer, of a Complaint and an Amended Complaint alleging violations of the Federal Election Campaign Act of 1971, as amended. Copies of the Complaint and Amended Complaint were forwarded to your clients at the time.

Upon further review of the allegations contained in the Complaint and Amended Complaint, and information supplied by your clients, the Commission, on July 13, 2021, voted to dismiss the allegations that Pembina Pipeline Corporation, Jordan Cove Energy Project L.P., Jordan Cove LNG, LLC, and Jordan Cove LNG, L.P., violated 52 U.S.C. § 30121(a)(1)(A) and 11 C.F.R. § 110.20(b) by making prohibited foreign national donations to Save Coos Jobs Committee, and dismiss the allegation that Fort Chicago Holdings, II US, LLC, violated

MUR 7512

Letter to Mmes. Gordon & Reulbach, Mr. Reese

Page 2

11 C.F.R. § 110.20(h) by providing substantial assistance to the making of prohibited foreign national donations to Save Coos Jobs Committee.

On July 13 and July 15, 2021, the Commission was equally divided on whether to find reason to believe, and equally divided on whether to find no reason to believe, that Pembina Pipeline Corporation, Jordan Cove Energy Project L.P., Jordan Cove LNG, LLC, Jordan Cove LNG, L.P., and Jordan Cove LNG LLC PAC and Allison Murray in her official capacity as treasurer violated 52 U.S.C. § 30121(a)(1)(A) and 11 C.F.R. § 110.20(b) by making prohibited foreign national donations and that Fort Chicago Holdings, II US, LLC, violated 11 C.F.R. § 110.20(h) by providing substantial assistance to the making of prohibited foreign national donations to other Oregon state and local committees. Accordingly, on July 15, 2021, the Commission closed its file in the matter.

The Factual and Legal Analysis and/or Statement(s) of Reasons, which more fully explain the Commission's decisions, will follow.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

If you have any questions, please contact Thaddeus H. Ewald, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Mark Allen

Mark Allen
Assistant General Counsel