

BEFORE THE FEDERAL ELECTION COMMISSION

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**RESPONSE OF SENATOR SUSAN COLLINS, COLLINS FOR SENATOR, AND
ELIZABETH MCCANDLESS AS TREASURER**

By and through undersigned counsel, Senator Susan Collins, Collins for Senator, and Elizabeth McCandless as Treasurer (collectively, the “Campaign” or “Respondents”) respond to the Complaint filed in the above-captioned Matter Under Review.

The Complaint, filed by the Maine Democratic Party in the final days of a competitive Senate race, shamelessly tries to puff up a highly technical reporting mistake (regarding less than 0.1% of the total contributions raised and reported by the Campaign to date) in the hope of scoring some political points. Yet the Campaign fully disclosed all of the individual contributions at issue in the Complaint, and has now corrected its reports consistent with its ordinary reporting practices to note that those contributions were received through a conduit (the National Association of Broadcaster's connected PAC, NABPAC) and forwarded by a Lobbyist/Registrant PAC.¹ Accordingly, the public record is accurate and complete, and the Commission should dismiss this matter consistent with its own precedents.² *See, e.g.*, F&LA, MUR 6537 (Flake for Senate, et al.) at 2 (dismissing complaint where candidate committee had accurately

¹ The Campaign has amended the two relevant quarterly reports to include on Schedule A the required reference in memo text to NABPAC as the conduit for the contributions. Those reports are available here: <https://docquery.fec.gov/cgi-bin/forms/C00314575/1471551> and <https://docquery.fec.gov/cgi-bin/forms/C00314575/1471552>. Out of an abundance of caution, the Campaign has also disclosed the 2019 and 2020 contributions on Form 3L even though NABPAC's conduit reporting made clear that it had forwarded the relevant contributions to Collins for Senator. Those reports are available here: <https://docquery.fec.gov/cgi-bin/forms/C00314575/1471548> and <https://docquery.fec.gov/cgi-bin/forms/C00314575/1471549>.

2 Two contributions of \$5,600 were transferred to the Campaign by NABPAC on February 24, 2020. Because the contributors at issue had previously contributed directly to the Campaign and the conduit contributions would have caused them to exceed the contribution limits, Collins for Senator immediately refunded the portions of those contributions that were excessive. The Campaign’s amended report reflects the receipt of the full amount of the conduit contributions and the associated partial refunds. The Campaign’s original report only disclosed the net contribution.

disclosed the original source of individual contributions but made minor reporting errors regarding the conduit, which the committee promptly corrected).

Respectfully submitted,



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