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April 27, 2021

VIA E-MAIL (CELA@fec.gov)

Jeff S. Jordan
Assistant General Counsel
Complaints Examination and Legal
Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7889 SIG SAUER, Inc.

Dear Mr. Jordan:

On behalf of SIG SAUER, Inc. (“SIG SAUER”), the undersigned counsel hereby responds to the Complaint filed with the Federal Election Commission (“FEC” or “Commission”) on March 17, 2021 by the Campaign Legal Center (“Complainant”) alleging violations of campaign finance law by SIG SAUER. SIG SAUER takes its responsibilities under the Federal Election Campaign Act very seriously and appreciates the opportunity to respond to the allegations raised in the Complaint. We respectfully request its expeditious dismissal.

SIG SAUER is headquartered in Newington, NH and employs over 2,200 employees. While SIG SAUER is honored to serve as a partner to the U.S. military and law enforcement agencies nationwide providing equipment, supplies and training, the company also has a strong commercial market and derives the majority of its revenues from its commercial customers.

The Complainant asserts that SIG SAUER’s contribution to the Gun Owners Action Fund (“GOAF”) on December 31, 2020 violated the prohibition on contributions from federal contractors because SIG SAUER was a federal government contractor at the time of the contribution. We do not contest our status as a federal government contractor, however the contribution to GOAF was made with the understanding that SIG SAUER was legally permitted to make such a contribution. As a relatively new entrant in the campaign finance world, SIG SAUER was not aware that such a prohibition existed with respect to independent expenditure committees and relied on GOAF’s “team of seasoned professionals.”¹ Had GOAF informed SIG

¹ See Exhibit A, Email communication dated December 29, 2020.

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SAUER that government contractors were prohibited from making a contribution, or if the solicitation or any of the materials given to SIG SAUER contained appropriate disclaimers that government contractors were prohibited from contributing, SIG SAUER would not have made the contribution. In fact, upon learning that the contribution may have violated federal law, SIG SAUER immediately contacted GOAF and communicated with its outside counsel to request a refund of the contribution.² In addition, SIG SAUER implemented additional compliance procedures to ensure that it does not inadvertently violate the government contractor prohibitions in the future.

Given that SIG SAUER did not intend to violate federal law, is a novice in making political expenditures, and took prompt action to remediate the violation, SIG SAUER respectfully requests that the Commission take no further action and close the file. In the alternative, SIG SAUER requests the opportunity to enter into pre-probable cause conciliation to expeditiously resolve this matter.

Respectfully submitted,



Melissa L. Laurenza
Partner

² GOAF refunded the contribution on April 23, 2021.

ATTACHMENT A

[REDACTED]

[REDACTED]

[REDACTED]

From: Cindy Daniel <[REDACTED]>
Sent: Tuesday, December 29, 2020 3:39 PM
To: [REDACTED] >
Cc: Marty Daniel [REDACTED]; Cindy Daniel [REDACTED]
Subject: [EXTERNAL] Gun Owners Action Fund Update

[External Message]

Friends –

Thanks for your interest in the Gun Owners Action Fund and our current work in Georgia.

Gun Owners Action Fund (GOAF) is a SuperPAC created to support candidates and officials who will protect and promote the 2nd Amendment.

GOAF's first mission is to help re-elect Senators David Perdue and Kelly Loeffler in the Georgia Senate Runoffs. It is crucial that Senators Loeffler and Perdue remain in the Senate to keep a pro-gun majority and protect the 2nd Amendment Rights of law-abiding Georgians.

GOAF is led by a team of seasoned professionals including the National Rifle Association's former Chief Political Strategist, Chris Cox.

GOAF has done extensive microtargeting to build and turnout a strong 2nd Amendment specific audience.

GOAF's first radio ad can be found here: [Joe's Secret](#).

GOAF is in the process of producing several digital ads and has sent out two mail pieces (attached).

The mail pieces are being sent to 550,000 likely Second Amendment voters statewide in Georgia. Thanks to strong initial backing, these two mailings, along with a digital campaign and rural radio ads have been funded. We now work towards raising additional funding to reach even more Second Amendment supporters.

Additional resources would allow us to mail the remaining 225,000 most persuadable Second Amendment voters in our files. In addition, we are producing (today) new broadcast ads and we hope to run a targeted broadcast and cable TV campaign according to the attached menu of TV advertising options. In addition, with additional resources we would look at using the ads we are producing to increase our digital advertising campaign. The financial goal to fully implement the remainder of the campaign is roughly \$1.4 million. To date, over \$1.5 million has been raised and deployed. As we have discussed, each piece of this effort can (and should) be funded as individual "a la carte" pieces.

See the Washington Examiner story for more details on GOAF's Georgia Effort: [New gun rights group led by ex-NRA strategist Chris Cox enters Georgia runoffs](#).

Wiring information:
Name: Gun Owners Action Fund
Routing #: [REDACTED]
Account #: [REDACTED]

Bank: [REDACTED]

Please let us know if you have any questions or need any further details.

Thank you,

Marty Daniel
[REDACTED]

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