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September 21, 2021

VIA E-MAIL (CELA@fec.gov)

Roy Q. Luckett
Acting Assistant General Counsel
Complaints Examination and Legal
Administration
Attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20463

Re: MUR 7914 SIG SAUER, Inc.

Dear Mr. Luckett:

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 July 20, 2021 by the Campaign for Accountability (“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 a U.S.-based company headquartered in Newington, NH and employs over 2,200 employees within the United States. SIG SAUER is owned by L&O Holding which also owns SIG Sauer AG, a Swiss company. L&O Holding owned SIG Sauer GmbH, a German company, until its closure in 2020.

The Complainant fails to allege any actual violation of the Federal Election Campaign Act by SIG SAUER. Without offering any factual evidence other than foreign ownership, the Complainant asserts that a U.S. company is violating the prohibition against foreign national interference in U.S. elections—a damaging allegation against an American-based company. The Complaint resurrects allegations of foreign money being funneled through the National Rifle Association (“NRA”) that the FEC dismissed in previous MURs and seeks to reanimate those allegations by baselessly accusing SIG SAUER of participating in illegal conduct in connection with the 2018 and 2020 elections.

Payments made to the NRA between 2017 and 2020 were made by SIG SAUER, not a foreign corporation, and were, in keeping with standard practice, approved by U.S. personnel.

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Furthermore, the payments were made for sponsorships of competitions, advertising space for SIG SAUER products in NRA publications, booths at conferences, conference events, and general purpose support. Our records do not indicate payments made for electioneering communications or for other activities in connection with elections.

Given that SIG SAUER's payments to the NRA were not directed or approved by a foreign national, the facts do not support the baseless allegations made by the Campaign for Accountability. We respectfully ask the Commission to dismiss this Complaint and take no further action with respect to SIG SAUER.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Melissa L. Laurenza". The signature is fluid and cursive, with the first name being the most prominent.

Melissa L. Laurenza
Partner