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October 8, 2024

VIA EMAIL CELA@FEC.GOV

Wanda D. Brown, Assistant General Counsel
Office of Complaints Examination & Legal Administration
Attn: Trace Keeys, Paralegal
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

RE: MUR 8316 – Google LLC NetPAC Response

Dear Ms. Brown:

This response is submitted on behalf of Google LLC NetPAC (“NetPAC”), and its Treasurer, to the Complaint filed with the Federal Election Commission (“Commission”) by Litaker for Congress and designated MUR 8316.

The alleged violation of the Federal Election Campaign Act (“Act”) related to NetPAC appears to be a clerical reporting error by the Terri Sewell for Congress (“Committee”), specifically naming “Google LLC NetPAC” instead of “Google LLC” as its vendor. Accordingly, the Commission should take no further action against NetPAC in this matter.

The Complaint falsely alleges that NetPAC violated the Act by accepting contributions from the Committee. The basis of these allegations is the Committee’s July 15, 2024 Quarterly Report, where the Committee disclosed four payments made to “Google LLC NetPAC” in connection with email storage/email services on the following dates: April 1, 2024, May 2, 2024, May 8, 2024, and June 3, 2024.

As a separate segregated fund, NetPAC does not offer products or services, including email storage services. Further, NetPAC neither solicits nor accepts contributions from candidate committees, and did not do so from the Committee.

However, Google LLC provides a number of commercial products and services, including email storage services. Prior to the July 15, 2024 Quarterly Report, and consistently since 2014, the Committee has properly disclosed Google LLC as the vendor on Line 17 for their email storage/email services. Thus, the change in vendor name appears to be a clerical input error.

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Politicom Law LLP
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The Commission should find no reason to believe that NetPAC violated the Act by accepting candidate committee funds and no action should be taken against NetPAC in connection with this Complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Erin Lama', with a stylized, cursive flourish at the end.

Erin Lama, Partner
Politicom Law P



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

AR/MUR/RR/P-MUR# 8316

Name of Counsel: Erin Lama

Firm: Politicom Law LLP

Address: 28 Liberty Ship Way, Suite 2815

Sausalito, CA 94965

Office#: 415.903.2800

Fax#: N/A

Mobile#: [REDACTED]

E-mail: elama@politicomlaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/3/24

Date

Anne E Wall

(Signature - Respondent/Agent/Treasurer)

Treasurer

Title

Anne Wall

(Name - Please Print)

Google LLC NetPAC

RESPONDENT:

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 25 Massachusetts Ave. NW 9th Floor
(Please Print)

Washington, DC 20001

Home#: 415.903.2800

Mobile#: N/A

Office#: [REDACTED]

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E-mail: NetPAC@politicomlaw.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.