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By OGC/CELA at 7:24 am, Oct 10, 2024

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October 8, 2024

Federal Election Commission  
Complaints Examination & Legal Administration  
Attn: Trace Keelys, Paralegal  
1050 First St., NE  
Washington, D.C. 20463

**Re: Matter Under Review 8316 (Microsoft Corporation Stakeholders  
Voluntary PAC)**

Dear Commissioners,

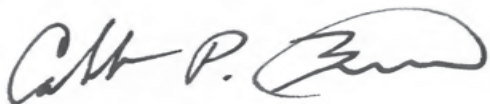
On September 24, 2024, the Federal Election Commission ("FEC" or "Commission") notified our clients, Microsoft Corporation Stakeholders Voluntary PAC - MSVPAC and DeLee Shoemaker in her official capacity as Treasurer, of a complaint filed by Mr. Jacob Thomas against Congresswoman Terri Sewell's re-election campaign. The complaint alleges that the campaign – Terri Sewell for Congress – "made multiple prohibited contributions" to several corporate PACs, including MSVPAC. Based on MSVPAC's FEC reports and internal accounting records, MSVPAC did not receive a contribution from Terri Sewell for Congress.

Rather, it appears Terri Sewell for Congress simply misreported MSVPAC – as opposed to Microsoft Corporation – as the recipient of various operating expenditures. Excerpts from the Terri Sewell for Congress FEC reports attached to the complaint describe the purpose of the \$8.00/month disbursements as "campaign software." That purpose is consistent with payments to Microsoft Corporation, a well-known purveyor of software, and not contributions to MSVPAC.

Counsel to Terri Sewell for Congress has since confirmed to us that the campaign did not contribute to MSVPAC, but had mistakenly disclosed MSVPAC – instead of Microsoft Corporation – as the recipient of the operating expenditures. We understand Terri Sewell for Congress will amend its FEC reports to correct this error.

Accordingly, the Commission should find no reason to believe that MSVPAC and DeLee Shoemaker in her official capacity as Treasurer violated the law and should dismiss them from this matter.

Sincerely,



Caleb P. Burns  
Andrew G. Woodson



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC

# STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: [cela@fec.gov](mailto:cela@fec.gov)

AR/MUR/RR/P-MUR# MUR 8316

Name of Counsel: Caleb P. Burns & Andrew G. Woodson

Firm: Wiley Rein LLP

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Washington, DC 20815

Office#: 202-719-7451; 202-719-4638 Fax#: 202-719-7049

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E-mail: [cburns@wiley.law](mailto:cburns@wiley.law); [awoodson@wiley.law](mailto:awoodson@wiley.law)

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.

10/1/24 DeLee Shoemaker \_\_\_\_\_  
Date (Signature - Respondent/Agent/Treasurer) Treasurer Title  
DeLee Shoemaker  
(Name - Please Print)

**RESPONDENT:** Microsoft Corporation Stakeholders Voluntary PAC - MSVPAC  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: \_\_\_\_\_  
(Please Print)

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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.



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC

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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.

10/1/24

Date

DeLee Shoemaker

(Signature - Respondent/Agent/Treasurer)

Treasurer

Title

DeLee Shoemaker

(Name - Please Print)

**RESPONDENT:** DeLee Shoemaker, in her official capacity as Treasurer of MSVPAC  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address:  
(Please Print)

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_ Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

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