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October 6, 2021

VIA E-MAIL (CELA@FEC.GOV)
CONFIDENTIAL

Mr. Roy Lockett
Attn: Christal Dennis, Paralegal
Office of Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 7833 (Hendrik G. Meijer)

Dear Mr. Lockett:

On September 21, 2021, our client Hendrik G. Meijer received a letter from the Federal Election Commission ("FEC" or "Commission") notifying Mr. Meijer of a complaint filed by the Campaign Legal Center. Enclosed is our client's signed Statement of Designation of Counsel in this matter.

As noted in the letter, the complaint does not name Mr. Meijer. Instead, the complaint alleges that Montcalm LLC ("Montcalm") violated two provisions of the Federal Election Campaign Act of 1971: a prohibition on contributions in the name of another and the registration and reporting requirements applicable to political committees. This is so, the complaint alleges, because Montcalm contributed to a federal super PAC that did not initially identify Montcalm's underlying members in the super PAC's FEC disclosure report. In response, Mr. Meijer adopts and incorporates Montcalm's December 14, 2020 submission by reference here.

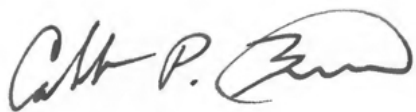
Montcalm is a single-member LLC whose sole member is Mr. Meijer. One day after the super PAC filed the FEC report referenced in the complaint, the super PAC filed an amended FEC report attributing the contribution to Mr. Meijer as Montcalm's single member. This should, effectively, moot the complaint.

Furthermore, the complaint's allegations are without legal merit. First, as explained in the Commission's regulations, contributions from a single-member LLC are attributed directly to the underlying individual member. Thus, there is no "other" person to serve as the intermediary contributor to sustain an allegation that a contribution was made in the name of another. Second, the Commission has already held that an individual underlying a single member LLC cannot be a political committee which is defined, in relevant part, as a "group of persons." Thus, the complaint's alternative allegation, that Montcalm should have registered and reported as a political committee, is also without legal merit.

For these reasons – and as explained in more detail in Montcalm's December 14, 2020 submission – this complaint should be dismissed.

Mr. Roy Lockett
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Sincerely,

A handwritten signature in black ink, appearing to read "Caleb P. Burns". The signature is fluid and cursive, with the first name "Caleb" and last name "Burns" clearly legible.

Caleb P. Burns
Andrew G. Woodson
Robert L. Walker

Enclosure



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

ARMUR/RR/P-MUR# 7833

Name of Counsel: Caleb P. Burns, Andrew G. Woodson, Robert L. Walker

Firm: Wiley Rein LLP

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Office#: (202) 719-7000 Fax#: (202) 719-7049

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E-mail: cburns@wiley.law, awoodson@wiley.law, rlwalker@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.

10-4-21 _____
Date (Signature - Respondent/Agent/Treasurer) Title

Hendrik G. Meijer
(Name - Please Print)

Hendrik G. Meijer

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

Mailing Address: Please contact through counsel
(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.