



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kirk Jowers, Esq.
Mathew Sanderson, Esq.
Caplin & Drysdale
One Thomas Circle, NW
Suite 1100
Washington, DC 20002

DEC - 2 2015

RE: MUR 6470, 6482, and 6484
The Commonwealth PAC – Alabama,
The Commonwealth PAC – Iowa,
The Commonwealth PAC – Michigan,
The Commonwealth PAC – New
Hampshire, The Commonwealth PAC –
South Carolina and Shauna Polk in her
official capacity as Treasurer

Dear Messrs. Jowers and Sanderson:


On May 18, 2011, July 27, 2011, and August 4, 2011, the Federal Election Commission notified your clients, The Commonwealth PAC – Alabama, The Commonwealth PAC – Iowa, The Commonwealth PAC – Michigan, The Commonwealth PAC – New Hampshire, The Commonwealth PAC – South Carolina, and Shauna Polk, in her official capacity as their Treasurer (collectively, the "State PACs"), of complaints alleging that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

On November 19, 2015, the Commission considered the complaints but was equally divided on whether to find reason to believe that the State PACs violated 52 U.S.C. § 30116(a)(1)(A) by making excessive in-kind contributions to Romney and Romney for President and 52 U.S.C. § 30116(f) by knowingly accepting excessive contributions from donors to the State PACs. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009).

[illegible]

Sincerely,

Sincerely,

William A. Powers
Assistant General Counsel