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May 27, 2015

**Via First Class U.S. Mail and Electronic Mail**

Federal Election Commission  
Office of General Counsel  
999 E Street N.W.  
Washington, D.C. 20463  
Attn.: Robert Knop and Theodore Lutz

**Re: Request for an Advisory Opinion**

Dear Mr. Knop and Mr. Lutz:

The Grand Trunk Western Railroad Co. – Illinois Central Railroad Co. Political Action Committee (“GTW-IC PAC” or “PAC”) respectfully submits this Request for an Advisory Opinion from the Federal Election Commission (“FEC”) with regard to the application of the Federal Election Campaign Act of 1971 or the regulations prescribed by the FEC, and pursuant to 11 C.F.R. § 112.1.

GTW-IC PAC is the separate segregated fund of Grand Trunk Western Railroad Company and Illinois Central Railroad Company and is registered with the FEC as a political action committee. GTW-IC PAC currently has a plan in place through which it attracts contributors by having the connected organizations make donations to a charity of the contributor’s choice in an amount equal to the individual contributor’s voluntary contribution to the PAC. There are no tangible benefits or premiums given to the PAC contributor from either the PAC, the connected organizations or the charity in response to the contributor’s PAC contribution. Indeed, the FEC has unquestionably approved this type of plan in many of its previous advisory opinions. See, e.g., Advisory Opinions 1986-44, 1987-18, and 1987-7.

GTW-IC PAC now requests an advisory opinion concerning the type of charity to which these donations can be made. Specifically, a certain individual contributor to the GTW-IC PAC wishes to designate the connected organizations’ matching donation for their contribution to a Canadian charity (which is not a 501(c)(3) certified charity). The specific charitable organization is called the Taylor Birks Foundation (the “Foundation”) and is headquartered in Montreal. It provides financial support to projects that assist children with intellectual disabilities. Its website is [www.taylor-birksfoundation.ca](http://www.taylor-birksfoundation.ca). The Foundation is a Registered Charity under the Canadian Income Tax Act, #11892 5296 RR0001. It is not clear whether this action is permissible under the Act, the regulations prescribed by the FEC, or its advisory opinions. As such, GTW-IC PAC requests that the FEC issue an advisory opinion addressing

# FLETCHER & SIPPEL LLC

Federal Election Commission

May 27, 2015

Page 2

whether the connected organizations for the GTW-IC PAC can permissibly make a dollar-for-dollar matching donation to a non 501(c)(3) certified charity such as the Foundation, if the Foundation is designated by a PAC contributor as the charity of choice to receive the donation.

Please feel free to contact me if you have any questions regarding this Request for an Advisory Opinion.

Sincerely,



Michael J. Barron, Jr.  
Attorney for GTW-IC PAC

MJB/ekf