

This responds to your inquiry of July 6, 2011, concerning the Committee s name and its listing of two connected organizations on its Amended Statement of Organization. The name and listing of the two connected organizations are in accordance with Federal Election Commission advisory opinions concerning the treatment of limited liability companies ( LLC ) electing partnership tax status and owned entirely by corporations. See, e.g., Advisory Opinion 2003-28 (Horizon Lines), 2009-14 (Mercedes-Benz USA LLC), 2004-42 (Pharmavite), 2001-18 (BellSouth), and 1997-13 (USA PAC). It is consistent with these rulings that Horizon Lines Holding Corp. and Horizon Lines of Puerto Rico, Inc., which own Horizon Lines LLC, have been listed as connected organizations and that Horizon Lines LLC was included in the Committee s name

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