



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY - 8 2018

By First Class Mail

LCGM, LLC
P.O. Box 266
Eaton Rapids, MI 48827

RE: MUR 7092

Dear Sir or Madam:

On June 29 and July 18, 2016, the Federal Election Commission (the "Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 24, 2018, the Commission found, on the basis of the information in the complaint, supplemental complaint, and other available information, that there is no reason to believe that you violated 52 U.S.C. § 30114(b)(1). Accordingly, the Commission closed its file in this matter as it pertains to you. The Factual and Legal Analysis, explaining the Commission's finding, is enclosed.

The Commission reminds you that the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Ana Peña-Wallace, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Shonkwiler".

Mark Shonkwiler
Assistant General Counsel

Enclosure
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION**FACTUAL AND LEGAL ANALYSIS****RESPONDENT:** LCGM, LLC

MUR 7092

I. INTRODUCTION

This matter was generated by a complaint filed with the Federal Election Commission (the “Commission”) pursuant to 52 U.S.C. § 30109(a)(1). The Complaint concerns payments made by an unauthorized political committee, Socially Responsible Government and Grace Rogers in her official capacity as treasurer (“SRG”), which solicited contributions through its website, www.feelbern.org. SRG’s website advocated the election of former 2016 Presidential candidate Bernie Sanders. The Complaint alleges that vendors who received disbursements from SRG violated the Federal Election Campaign Act of 1971, as amended (the “Act”), by converting committee funds to personal use.¹

The Complaint in MUR 7092 identifies payments made by SRG to LCGM LLC (the “Respondent” or “vendor”).² The Complaint alleges that the Respondent skirted the law by SRG funneling expenditures through “recently created shell corporations” to personally benefit the Respondent,³ and concludes that the vendor misused committee funds in violation of the Act’s prohibition against the personal use of campaign funds.⁴ The Respondent did not submit a response to the Complaint.

¹ Compl., MUR 7092 at 5–8 (June 24, 2016) (“MUR 7092 Compl.”).

² MUR 7092 Compl. at 5-8.

³ *Id.* at App. I-J.

⁴ *Id.* at 8.

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1 The Act prohibits the conversion of “contributions accepted by a candidate” to personal
2 use.⁵ Because SRG is an unauthorized committee, the Act’s personal use provisions are not
3 applicable here. Therefore, the Commission finds no reason to believe that LCGM, LLC violated
4 52 U.S.C. § 30114(b)(1).

⁵ 52 U.S.C. § 30114(a).