



FEDERAL ELECTION COMMISSION
Washington, DC 20463

By: Electronic Mail

January 6, 2021

Lawrence Norton, Esq.
Venable, LLP
600 Massachusetts Avenue, N.W.
Washington, D.C. 20001
LHNorton@venable.com

RE: MUR 7102
Keefe, Keefe & Unsell, P.C.

Dear Mr. Norton:

On November 23, 2020, the Office of General Counsel sent by electronic mail a brief ("General Counsel's Brief") setting forth the factual and legal basis upon which the Office of General Counsel was prepared to recommend that the Commission find probable cause to believe that Keefe, Keefe & Unsell, P.C. violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f); and that Thomas W. Keefe, Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), and 114.2(e) in connection with the \$18,900 in Firm employee contributions to the congressional campaign of CJ Baricevic, and the \$10,800 in Firm employee contributions to the Hillary Clinton campaign. You filed a Reply Brief on December 8, 2020, and the Commission held a probable cause hearing on January 5, 2021.

Pursuant to the Commission's Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel, 76 Fed.Reg. 63,570 (October 13, 2011), the Office of General Counsel is notifying the Commission that it intends to proceed with the recommendation to find probable cause to believe that Keefe, Keefe & Unsell, P.C. violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f); and that Thomas W. Keefe, Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), and 114.2(e) based on the factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is being provided to you contemporaneously.

Sincerely,
Kimberly D. Hart
Kimberly D. Hart

Attachment: Office of General Counsel Notice to Commission



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson *LJS*
Acting General Counsel

Charles Kitcher *CK*
Acting Associate General Counsel for Enforcement

Stephen Gura *SG*
Deputy Associate General Counsel

Mark Shonkwiler *MS*
Assistant General Counsel

Kimberly D. Hart *KH/ms*
Staff Attorney

SUBJECT: MUR 7102 (Keefe, Keefe & Unsell, P.C.)

RE: Office of the General Counsel's Notice to the Commission Following the Submission of Probable Cause Brief

On November 23, 2020, the Office of the General Counsel ("OGC") notified Keefe, Keefe & Unsell, P.C. (the "Firm") and Thomas Q. Keefe, Jr. ("Keefe") that it was prepared to recommend that the Commission find probable cause to believe that Keefe, Keefe & Unsell, P.C. violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f); and that Thomas W. Keefe, Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), and 114.2(e) in connection with the \$18,900 in Firm employee contributions to the congressional campaign of CJ Baricevic, and the \$10,800 in Firm employee contributions to the Hillary Clinton campaign. OGC's notification included a General Counsel's Brief setting forth the factual and legal basis for the recommendation. On December 8, 2020, Respondents filed a Response to the Probable Cause Brief and requested a probable cause hearing pursuant to *Procedural Rules for Probable Cause Hearings*, 72 Fed. Reg. 64,919 2 (Nov. 19, 2007). A hearing was held on January 5, 2021.

No new information has been presented in this matter that would affect the conclusions of the General Counsel's Brief. Thus, pursuant to the *Agency Procedure Following the Submission*

1 *of Probable Cause Briefs by the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011),
2 OGC is hereby notifying the Commission that it intends to proceed with the recommendation to
3 find probable cause to believe that Keefe, Keefe, and Unsell, P.C. and Thomas Q. Keefe, Jr.
4 violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f); and
5 that Thomas W. Keefe Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R.
6 §§ 110.4(b)(1)(i), and 114.2(e) based on the factual and legal analysis set forth in the General
7 Counsel's Brief.

8
9 A copy of this Notice is being provided to the Respondents at the same time that it is
10 circulated to the Commission.

11
12 **RECOMMENDATION**

13
14 Find probable cause to believe that Keefe, Keefe, and Unsell, P.C. and Thomas Q. Keefe,
15 Jr. violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f);
16 and that Thomas W. Keefe Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R.
17 §§ 110.4(b)(1)(i), and 114.2(e).