



**FEDERAL ELECTION COMMISSION
Washington, DC 20463**

Via Electronic Mail

January 15, 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 January 12, 2021, the Federal Election Commission voted to reject your client Keefe, Keefe & Unsell, P.C.'s August 23, 2019, Request for Pre-Probable Cause Conciliation, and found that there is probable cause to believe that your client 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), provisions of the Federal Election Campaign Act of 1971, as amended in connection with making \$18,900 in prohibited corporate contributions in the names of others, and by using corporate resources to facilitate such prohibited contributions.

The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter.

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

PCTB Letter w/ CA

Page **2** of **2**

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Kimberly Hart, the attorney assigned to this matter, at (202) 694-1618.

Sincerely,

Mark Shonkwiler

Mark D. Shonkwiler
Assistant General Counsel