



FEDERAL ELECTION COMMISSION

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2 **MEMORANDUM**

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4 **TO:** The Commission

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6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel

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9 Charles Kitcher
10 Acting Associate General Counsel for Enforcement

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12 Stephen Gura
13 Deputy Associate General Counsel for Enforcement

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15 **DATE:** January 29, 2021

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17 **BY:** Mark Shonkwiler *MS*
18 Assistant General Counsel

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20 Kimberly D. Hart *KH/ms*
21 Attorney

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23 **SUBJECT:** MUR 7102 (Keefe, Keefe & Unsell, P.C) Probable Cause Conciliation
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26 On January 12, 2021, the Commission found probable cause to believe that Keefe, Keefe
27 & Unsell, P.C. (the "Firm"), violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R.
28 §§ 110.4(b)(1)(i), 114.2(b) and (f) by making \$18,900 in prohibited corporate contributions in
29 the names of others, and by using corporate resources to facilitate such prohibited contributions.
30 The Commission authorized the Office of the General Counsel to engage in probable cause
31 conciliation with the Firm.

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33 . We recommend that the Commission accept the signed
34 agreement, take no further action as to the individual partners who were the subject of reason to
35 believe findings, and close the file in this matter.
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MUR 7102 (Keefe, Keefe & Unsell, P.C.)

Memorandum to the Commission

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We believe this negotiated settlement represents an acceptable resolution of the matter. We therefore recommend that the Commission accept the signed conciliation agreement with the Firm. We also recommend that the Commission take no further action as to the three individual partners in the Firm that previously were the subject of reason to believe findings: Thomas Q. Keefe, Jr., Thomas Q. Keefe III, and Samantha Unsell. Finally, we recommend that the Commission close the file.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement.
2. Take no further action as to Thomas Q. Keefe, Jr., Thomas Q Keefe III, and Samantha Unsell.
3. Approve the appropriate letters.
4. Close the file.