



**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

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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  
14  
15 **BY:** Mark Allen *MA*  
16 Assistant General Counsel  
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18 Richard L. Weiss *RLW*  
19 Attorney  
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21 **SUBJECT:** MUR 7450 (AshBritt, Inc.)  
22 Recommendation to Accept Signed Conciliation Agreement  
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25 On March 23, 2021, the Commission approved a conciliation agreement with AshBritt,  
26 Inc. (“AshBritt”) to settle violations of 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by  
27 making prohibited federal contractor contributions to America First Action, Inc. (“AFA”) and  
28 Floridians for a Strong Middle Class (“FSMC”).<sup>1</sup>  
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<sup>1</sup> See Certification, MUR 7450 (Apr. 14, 2021); Factual & Legal Analysis at 6, MUR 7450 (AshBritt, Inc.).

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In addition, at the time the Commission found reason to believe as to AshBritt, it took no action as to AFA.<sup>7</sup> We did not learn any additional information during our conciliation negotiations. Therefore, we now recommend that the Commission dismiss the allegation that America First Action, Inc. and Jon Proch in his official capacity as treasurer knowingly violated 52 U.S.C. § 30119(a)(2) and close the file.

<sup>7</sup> See Certification, MUR 7450 (July 24, 2019).

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1    **RECOMMENDATIONS:**

- 2           1. Accept the signed conciliation agreement with AshBritt, Inc.;
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- 4           2. Dismiss the allegation that America First Action, Inc. and Jon Proch in his official
- 5           capacity as treasurer violated 52 U.S.C. § 30119(a)(2) by knowingly soliciting a
- 6           federal contractor contribution;
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- 8           3. Approve the appropriate letters; and
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- 10          4. Close the file.
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