



FEDERAL ELECTION COMMISSION
Washington, DC 20463

BY E-MAIL AND USPS

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JUN 19 2019

RE: MUR 7451
Ring Power Corporation

Dear Ms. Cold:

On June 12, 2019, the Federal Election Commission (the "Commission") accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 52 U.S.C. § 30119(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink that reads "Wanda D. Brown".

Wanda D. Brown
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION COUNSEL

In the matter of

Ring Power Corporation

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MUR 7451

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Campaign Legal Center through Brendan M. Fischer. The Commission found reason to believe that Ring Power Corporation ("Ring Power" or "Respondent") violated 52 U.S.C. § 30119(a)(1) by making a contribution as a federal contractor.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Ring Power Corporation is a private Florida corporation that sells and leases industrial machinery. Ring Power is also a federal government contractor, and has been the recipient of government contracts and grants since 2007.

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COUNSEL

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2. On April 23, 2018, while Ring Power was in federal contractor status, it made a \$50,000 contribution to New Republican PAC (the "Committee"), an independent-expenditure-only political committee.

3. On August 16, 2018, the Committee refunded Ring Power's \$50,000 contribution.

V. The pertinent law in this matter is as follows:

1. Under the Federal Election Campaign Act of 1971, as amended (the "Act"), a federal contractor may not make contributions to political committees. 52 U.S.C. § 30119(a); 11 C.F.R. § 115.2. Specifically, the Act prohibits "any person . . . [w]ho enters into any contract with the United States . . . for the rendition of personal services or furnishing any material, supplies, or equipment to the United States or any department or agency thereof" from making a contribution "if payment for the performance of such contract . . . is to be made in whole or in part from funds appropriated by the Congress." 52 U.S.C. § 30119(a)(1); *see also* 11 C.F.R. part 115.

2. These prohibitions begin to run at the beginning of negotiations or when proposal requests are sent out, whichever occurs first, and end upon the completion of performance of the contract or the termination of negotiations, whichever occurs last. 52 U.S.C. § 30119 (a)(1); 11 C.F.R. § 115.1(b).

3. These prohibitions apply to a federal contractor who makes contributions to any political party, political committee, federal candidate, or "any person for any political purpose or use." 52 U.S.C. § 30119(a)(1); 11 C.F.R. §§ 115.1, 115.2.

VI. Respondent violated 52 U.S.C. § 30119(a)(1) by making federal contractor contributions.

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VII. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of Nine Thousand Five Hundred (\$9,500) Dollars pursuant to 52 U.S.C. § 30109(a)(5)(A).
2. Respondent will cease and desist from violating 52 U.S.C. § 30119(a)(1).

VIII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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