



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 9, 2022

To: The Commission

From: Lisa J. Stevenson
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Re: MUR 7491 (American Ethane Co., LLC, *et al.*) – Recommendation to Accept
Pre-Probable Cause Conciliation Agreement

I. INTRODUCTION

On June 22, 2022, the Commission authorized pre-probable cause conciliation to resolve a finding that American Ethane Co., LLC (“American Ethane”) made, and Chief Executive Officer John Houghtaling consented to making, prohibited corporate contributions in violation of 52 U.S.C. § 30118 of the Federal Election Campaign Act of 1971, as amended (the “Act”).¹ The Commission approved a joint conciliation agreement with American Ethane and Houghtaling

¹ Certification (“Cert.”) ¶ 1 (June 24, 2022).

² *Id.* There was an insufficient number of votes to approve a motion to dismiss allegations that American Ethane and Houghtaling violated 52 U.S.C. §§ 30121 and 30122 and a motion to dismiss allegations that Bold Strategies LLC; Kyle Ruckert; Conservative Louisiana and Michele Reisner in her official capacity as treasurer; Mike Johnson for Louisiana and William Vanderbrook in his official capacity as treasurer; and Konstantin Nikolaev violated the Act. *Id.* ¶ 2(a-b).

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We believe this agreement sufficiently vindicates the Commission's enforcement interests and that the negotiated edits do not undermine the Commission's findings. Therefore, we recommend that the Commission accept the attached negotiated conciliation agreement.

III. RECOMMENDATIONS

1. Accept the Conciliation Agreement with American Ethane Co., LLC, and John Houghtaling;
2. Approve the appropriate letters; and
3. Close the file.