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MUR # 7570  
Supplement

March 19, 2019

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463

**Re: Additional Facts Relevant to Skytron, LLC Complaint**

Dear Ms. Stevenson:

The Campaign Legal Center ("CLC") writes to supplement its complaint filed February 21, 2019 against Skytron, LLC, which violated FECA's prohibition on federal contractors making contributions to political committees while negotiating or performing federal contracts, 52 U.S.C. § 30119(a)(1), by contributing \$10,000 to Outsider PAC (ID: C00678920).<sup>1</sup>

The same day that CLC filed its complaint, *The Detroit News* published a story reporting on the complaint that included comment from Outsider PAC:<sup>2</sup>

"Outsider PAC complies with all relevant campaign finance laws, including not soliciting contributions from federal contractors," said Derek H.

<sup>1</sup> CLC filed two other complaints on February 21, 2019 against other federal contractors which had also violated 52 U.S.C. § 30119(a)(1). The Commission confirmed receipt of all three complaints and assigned them MUR numbers 7568, 7569, and 7570. It is not known which MUR number corresponds to which complaint, as the acknowledgement letters did not name the respondents.

<sup>2</sup> Melissa Nann Burke, *Another Contractor Scrutinized for Giving to John James super PAC*, THE DETROIT NEWS (Feb. 21, 2019), <https://www.detroitnews.com/story/news/politics/2019/02/21/fec-complaint-john-james-federal-contractor/293458200/>.

Ross, counsel for Outsider PAC. "While the PAC does not comment on specific donors, it has no reason to believe that this contribution was not permissible."<sup>3</sup>

That same day, shortly after the complaint was filed and *The Detroit News* story published, Outsider PAC amended its report to reattribute Skytron, LLC's contribution to the KMW Group, Inc., at the address 5085 Corporate Exchange Blvd SE, Grand Rapids, MI, 49512.<sup>4</sup> Skytron, LLC is a "division" of the KMW Group, Inc., according to Skytron, LLC's website.<sup>5</sup>

According to USASpending.gov, "the official source for spending data for the U.S. Government,"<sup>6</sup> the KMW Group, Inc., at 5085 Corporate Exchange Blvd, Grand Rapids, MI, 49512, is and has been the recipient of multiple federal contracts.<sup>7</sup> The USASpending.gov website also treats KMW Group, Inc. as the parent of Skytron, LLC.<sup>8</sup>

Therefore, there is reason to believe that either or both the KMW Group, Inc. and Skytron, LLC made prohibited contributions while performing or negotiating federal contracts, in violation of 52 U.S.C. § 30119(a)(1).

<sup>3</sup> *Id.*

<sup>4</sup> Outsider PAC, 30-Day Post-General Report, FEC Form 3X, at 11 (amended Feb. 21, 2019), <http://docquery.fec.gov/pdf/490/201902219145578490/201902219145578490.pdf>. According to the report's timestamp, it was filed at 6:24pm. *Id.* at 1. *The Detroit News* story published at 11:00am. Burke, *supra* note 2.

<sup>5</sup> *History*, Skytron, <http://www.skytron.us/about/pages/history.html> (last visited Mar. 12, 2019).

<sup>6</sup> USASpending.gov, *Mission*, <https://www.usaspending.gov/#/about> (last visited Feb. 21, 2019).

<sup>7</sup> See USASpending.gov, Keyword Search for "KMW," [https://www.usaspending.gov/#/keyword\\_search/%22kmw%22](https://www.usaspending.gov/#/keyword_search/%22kmw%22) (last visited Mar. 12, 2019); see also, e.g., USASpending.gov, Contract Summary, Award IDVA24913J3106, <https://www.usaspending.gov/#/award/36415028> (showing a contract with the U.S. Department of Veterans Affairs, with a period of performance of July 29, 2013 through December 17, 2018 and a potential award amount of \$494,232).

<sup>8</sup> Compare USASpending.gov, Contract Summary, Award IDVA24913J3106, *supra* note 7 (KMW Group, Inc. contract award listing both "Parent DUNS" and "DUNS" number 017088927), with USASpending.gov, Contract Summary, Award ID HHSI245201800127P, <https://www.usaspending.gov/#/award/23256046> (Skytron, LLC award listing the same "Parent DUNS" number, 017088927, but a different DUNS number, 078375583).

Respectfully submitted,



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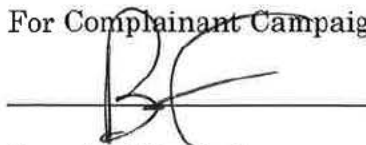
March 19, 2019

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Supplement are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Brendan M. Fischer

Sworn to and subscribed before me this 19 day of March 2019.



Notary Public

