

TO: The Commission FROM: Lisa J. Stevenson **Acting General Counsel** Charles Kitcher Associate General Counsel for Enforcement Claudio J. Pavia Deputy Associate General Counsel for Enforcement Ana J. Peña-Wallace APW BY: **Assistant General Counsel** Kenneth E. Sealls Attorney **DATE:** June 28, 2024 **SUBJECT:** MUR 7690 (PacMar Technologies, LLC) Recommendation to Rescind Reason to Believe Finding With Respect to the Collins for Senator Contribution and for Approval of Conciliation Agreement

On June 27, 2024, the Commission voted to approve certain recommendations from the Second General Counsel's Report for this matter. Among those, the Commission approved Recommendation 6 of the Report, which stated "Find reason to believe that PacMar Technologies, LLC, f/k/a Navatek LLC, knowingly and willfully violated 52 U.S.C. § 30119 by making contributions as a government contractor to 1820 PAC and to Collins for Senator." We believe the Commission did not intend to approve findings relating to the Collins for Senator contribution scheme in this matter. Therefore, we recommend that the Commission rescind that finding as it relates to the government contractor contribution to Collins for Senator. The Commission's reason to believe finding that PacMar Technologies, LLC, f/k/a Navatek LLC, knowingly and willfully violated 52 U.S.C. § 30119 by making contributions as a government contractor to 1820 PAC would remain in place.



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39 40	Based on the foregoing, we recommend that the Commission rescind the reason to believe finding in Recommendation 6 as it relates to the Collins for Senator contribution and that
41	it approve the attached Conciliation Agreement.
42	RECOMMENDATIONS:
43 44 45 46	1. Rescind the Commission's finding of reason to believe that PacMar Technologies, LLC, f/k/a Navatek LLC, knowingly and willfully violated 52 U.S.C. § 30119 by making contributions as a government contractor to Collins for Senator.
47	2. Approve the attached Conciliation Agreement.
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