



THE FEDERAL ELECTION COMMISSION
Washington, DC 20002

1 **MEMORANDUM**

2
3 **TO:** The Commission

4 **FROM:** Lisa J. Stevenson
5 Acting General Counsel

6 Charles Kitcher
7 Associate General Counsel for Enforcement

8 Claudio J. Pavia
9 Acting Deputy Associate General Counsel for Enforcement

10 **BY:** Mark Shonkwiler *MS*
11 Assistant General Counsel

12 Ray Wolcott *RW*
13 Attorney

14 **SUBJECT:** MUR 7889 (SIG SAUER) – Pre-Probable Cause Conciliation Agreement
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17 On January 11, 2022, the Commission found reason to believe that SIG SAUER, Inc.
18 violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(a) by making a prohibited federal contractor
19 contribution to Gun Owners Action Fund (“GOAF”) and authorized pre-probable cause conciliation
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24 In the First General Counsel’s Report, we indicated that the Office of General Counsel
25 intended to notify Daniel Defense, LLC as an additional respondent for making a prohibited
26 government contractor contribution of \$100,000 to GOAF.² As explained, this contribution was
27 not specifically mentioned in the complaint, but this Office became aware of the potential federal
28 contractor contribution in the normal course of carrying out the Commission’s supervisory

¹ Amended Certification ¶¶ 2.a-b (Feb. 11, 2022).

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1 responsibilities.³ Accordingly, on February 16, 2022, this Office notified Daniels Defense, LLC,
2 as a respondent for potential violations of 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a).⁴ A
3 copy of the notification letter is attached.

4 The file in this matter remains open as to both GOAF and Daniel Defense, LLC. The
5 Office of General Counsel will make appropriate recommendations as to Daniel Defense, LLC
6 after they have had the opportunity to respond and, concurrently, re-address our prior
7 recommendation that the Commission find reason to believe as to Gun Owners Action Fund,
8 which remains pending.

9 **RECOMMENDATIONS:**

- 10 1. Accept the attached conciliation agreement with SIG SAUER, Inc.;
- 11 2. Close the file as to SIG SAUER, Inc. and
- 12 3. Approve the appropriate letter.

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³ *Id.* at 13.

⁴ Notification was provided to Daniel Defense, LLC pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).