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From: [Weeks, John F.](#)
To: [CELA](#)
Subject: MUR 7914 - Taurus Holdings, Inc.'s Written Response
Date: Friday, September 17, 2021 3:50:03 PM
Attachments: [MUR7914- Taurus Holdings.pdf](#)
[Declaration of Kevin Riggott.pdf](#)

This law firm represents Respondent Taurus Holdings, Inc.

Please see the attached written response filed by Taurus Holdings, Inc. in MUR 7914. That written response includes the attached Declaration of Mr. Kevin Riggott.

Please acknowledge receipt of Taurus Holdings, Inc.'s written response.

Do not hesitate to contact me with any questions.

Best regards,

John

John F. Weeks IV

Partner

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September 17, 2021

VIA FEDERAL EXPRESS AND EMAIL

Federal Election Commission (cela@fec.gov)
 Office of Complaints Examination & Legal Administration
 Attn: Roy Q. Luckett, Acting Assistant G.C. & Kathryn Ross, Paralegal
 1050 First Street, NE
 Washington, DC 20463

Re: *National Rifle Association of America, et al., MUR 7914*

Dear Mr. Luckett:

This law firm represents Taurus Holdings, Inc. ("Holdings") in the above-referenced matter. We write in response to your letter dated July 27, 2021, enclosing a complaint to the Commission filed by the Campaign for Accountability and Michelle KupperSmith ("Complainants").

Please accept this letter and, more importantly, the enclosed sworn Declaration of Kevin J. Riggott as Holdings's written demonstration that no further action should be taken in this MUR. In their paper, Complainants allege that Holdings violated the Federal Election Campaign Act of 1971 and Federal Election Commission regulations by virtue of nothing more than Holdings's association with and support of the National Rifle Association and its affiliated entities. Complainants' allegations are apparently premised on the mistaken belief that Holdings is a Brazilian company and because "Taurus . . . agreed to contribute up to \$1,000,000 to the NRA-ILA to match contributions made to the organization between September 1, 2020 and November 15, 2020." (Complaint at ¶ 11.)

Complainants' allegation that Holdings has violated any federal law or regulation is legally and factually meritless. And they almost certainly know it. Indeed, Complainants themselves state that "while each gunmaker operates a U.S. subsidiary, it is unclear whether the contributions resulting in each gunmaker's donor status were entirely funded by those subsidiaries." (Complaint at ¶ 10.)

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Complainants include this hedge because, under federal law and the Commission's advisory opinions, if any complained of donation was entirely funded by a foreign national's U.S. subsidiary's operations and a foreign national did not "direct, dictate, control, or directly or indirectly participate in the decision-making process" of the U.S. subsidiary to donate, then no violation has occurred. (11 C.F.R. § 110.20(i).)

Such is the case here, and no evidence has been presented to the contrary. As Mr. Riggott's declaration now makes clear, Holdings is a corporation organized and existing under the laws of the State of Georgia. Owned by a Brazilian company called Taurus Armas, S.A., Holdings is led by U.S. citizens and owns several companies all with operations in Bainbridge, Georgia that employ hundreds of hardworking women and men engaged primarily in the import, manufacture, and distribution of hundreds of thousands of firearms each year to federally-licensed customers across the United States. One of Holdings's companies, Taurus International Manufacturing, Inc. ("TIMI") made a \$25,000.00 contribution to the NRA-ILA on September 25, 2021.

That relatively modest contribution was entirely funded from the tens of millions of revenue generated by TIMI's U.S. operations. In the sworn Declaration, Mr. Riggott states that Taurus Armas, S.A. has not paid or transferred to Holdings or TIMI any money other than for (i) purchases of product from TIMI; (2) repayment of loans from TIMI to Taurus Armas, S.A.; and (3) repayment of legal expenses incurred by TIMI on Taurus Armas, S.A.'s behalf. Put plainly, Taurus Armas, S.A. did not fund TIMI's contribution to the NRA-ILA.

As further made clear by Mr. Riggott, the decision to make the contribution was made by TIMI's CEO and President, Mr. Bret Vorhees, in consultation with Mr. Riggott and no one else. Both men are U.S. citizens. No foreign national directed, dictated, controlled or participated—directly or indirectly—in the decision to contribute. Consequently, Holdings has not violated federal law or the Commission's regulations.

Holdings, therefore, respectfully requests that the Commission dismiss MUR 7914 and close the file.

Sincerely yours,

SMITH, GAMBRELL & RUSSELL, LLP



John F. Weeks IV

JFW/

enclosure

FEDERAL ELECTION COMMISSION

In the matter of:

MUR No.: 7914

National Rifle Association of America, *et al.*

Declaration of Kevin J. Riggott

1. My name is Kevin J. Riggott. I am over twenty-one (21) years of age, under no disability, and competent to testify to the matters contained in this declaration based upon personal knowledge and investigation.

2. I am the Vice President and Chief Financial Officer of Taurus Holdings, Inc. (“Holdings”). I am a citizen of the United States of America.

3. I have read the Complaint filed by the Campaign for Accountability and Michelle Koppersmith.

4. Bret Vorhees is the President and Chief Executive Officer of Holdings. Mr. Vorhees is a citizen of the United States of America.

5. Holdings is a corporation organized and existing under the laws of the State of Georgia, and its corporate headquarters and principal place of business is located at 100 Taurus Way, Bainbridge, Decatur County, Georgia, 39817.

6. There are currently five members of Holdings’s Board of Directors. Mr. Vorhees and I are both members. The remaining three members of the board are not U.S. citizens.

7. Holdings owns various companies that import, manufacture, and then sell firearms in the United States of America through the U.S. Bureau of Alcohol, Tobacco, Firearms, and Explosives-sanctioned system, that is, by sale to independent federally-licensed distributors who resell to federally-licensed retail outlets.

8. One such company owned by Holdings is Taurus International Manufacturing, Inc. ("TIMI"). Each of the companies Holdings owns, including TIMI, is organized and existing under the laws of the State of Georgia.

9. Holdings owns 100 percent of the issued and outstanding shares of TIMI.

10. Each of the companies Holdings owns, including TIMI, maintain separate financial statements and bank accounts from each other and from Holdings.

11. I am the Vice President and Chief Financial Officer of TIMI.

12. Mr. Vorhees is the President and Chief Executive Officer of TIMI.

13. Both I and Mr. Vorhees are members of TIMI's five-person Board of Directors. The remaining three members of the board are not U.S. citizens.

14. Taurus Armas, S.A. owns 100 percent of the issued and outstanding shares of Holdings. Taurus Armas, S.A. is a *sociedade anônima* organized and existing under the laws of Brazil, with its headquarters located in São Leopoldo, Rio

Grande do Sul, Brazil. Shares of Taurus Armas, S.A. are publicly traded on the BM&F BOVESPA stock exchange in São Paulo, Brazil.

15. Holdings maintains financial statements, bank accounts, and credit facilities separate from Taurus Armas, S.A.

16. Neither I nor Mr. Vorhees are employed by Taurus Armas, S.A. or hold any position, title, role, office, or board seat with that company.

17. Taurus Armas, S.A. has manufactured firearms in Brazil for sale under the Taurus brand since the 1940s.

18. TIMI regularly purchases firearms from Taurus Armas, S.A. in Brazil, and then imports those firearms into the U.S for resale. From its operating account at a U.S. bank, TIMI wires the funds used to purchase these firearms to Taurus Armas, S.A.'s accounts at banks in Brazil.

19. TIMI also exports to Taurus Armas, S.A. in Brazil firearms that TIMI itself manufactures in the U.S. as well as ammunition and accessories that TIMI purchases from U.S. suppliers.

20. TIMI receives payment for these firearms, ammunition, and accessories through wire transfers from Taurus Armas, S.A. to TIMI's U.S. bank account. All TIMI customer payments are made to or "swept" daily into TIMI's operating account at the same U.S. bank.

21. Other than payments made for the purchases referenced above, repayment of loans made before 2018, or the payment of legal expenses incurred by TIMI on behalf of Taurus Armas, S.A., Taurus Armas, S.A. has not paid, transferred, deposited, contributed, loaned, or given to TIMI any money at any time since my employment began in 2018.

22. Likewise, Taurus Armas, S.A. has not paid, transferred, deposited, contributed, loaned, or given to Holdings any money during that same time period.

23. On September 25, 2020, TIMI issued a check in the amount of \$25,000.00 made payable to NRA Institute for Legislative Action and drawn on TIMI's operating account.

24. None of the non-U.S. citizen members of the TIMI board participated in the decision to make the donation described in paragraph 23 of this Declaration.

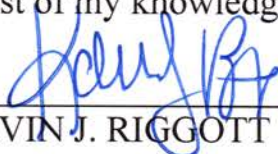
25. None of the non-U.S. citizen members of the Holdings board participated in the decision to make the donation described in paragraph 23 of this Declaration.

26. No executive or board member of Taurus Armas, S.A. participated in the decision to make the donation described in paragraph 23 of this Declaration.

27. In consultation with only me, and without any influence or interaction with anyone else, Mr. Vorhees decided and then directed that the \$25,000.00 donation be made by TIMI to the NRA Institute for Legislative Action.

28. I have nothing further to say at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.



KEVIN J. RIGGOTT
9/17/2021

Date



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL ccla@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7914

Name of Counsel: John F. Weeks IV

Firm: Smith, Gambrell & Russell, LLP

Address: 1105 W. Peachtree Street NE, Suite 1000

Atlanta, Georgia 30305

Office#: 404 815 3746 Fax#: 404 685 7046

Mobile#: _____

E-mail: jweeks@sgrlaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/20/2021
Date

[Signature]
(Signature - Respondent/Agent/Treasurer)

VP/CFO
Title

KEVIN RIGGOTT
(Name - Please Print)

Taurus Holdings, Inc.

RESPONDENT: _____
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 100 Taurus Way
(Please Print)

Bainbridge, Georgia 39817

Home#: _____ Mobile#: _____

Office#: 229-515-8464 xt 2302 Fax#: _____

E-mail: kevin.riggott@taurus Holdings, Inc.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.