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The Wiley logo consists of the word "wiley" in a bold, lowercase, red sans-serif font.

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September 28, 2022

**VIA E-MAIL**

Mr. Roy Q. Luckett  
Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Christal Dennis, Paralegal  
1050 First Street, NE  
Washington, DC 20463

**Re: Matter Under Review 8021 (Ohio Ordnance Works, Inc.)**

Dear Mr. Luckett:

On September 14, 2022, the Federal Election Commission ("FEC" or "Commission") notified our clients, Club for Growth Action and Adam Rozansky, in his official capacity as treasurer (collectively "Club Action"), of a complaint filed on June 29 by the Campaign Legal Center ("CLC"). Attached is an executed Designation of Counsel form.

As an initial matter, the complaint – which was served outside the 5-day notification period provided for in 11 C.F.R. § 111.5 – neither names Club Action as a respondent nor alleges that Club Action did anything impermissible. Thus, Club Action should be dismissed from this matter at the threshold.

Furthermore, the Federal Election Campaign Act of 1971, as amended ("FECA"), imposes liability only on political committees that "knowingly" solicit a contribution in violation of the federal contractor ban. *See* 52 U.S.C. § 30119; *see also* 11 C.F.R. §§ 115.1 *et seq.* Here, Club Action was unaware of Ohio Ordnance Works, Inc.'s potential status as a federal contractor until after CLC filed its complaint. Indeed, Club Action regularly warns prospective contributors that it cannot accept contributions from federal contractors. *See* Attachment A (informing Ohio Ordnance Works that "[c]ontributions from foreign nationals (non-Green Card holders), government contractors and national banks are prohibited"). Because Club Action did not "knowingly" solicit a contribution from a federal contractor in violation of the FECA, the Commission should dismiss Club Action from this matter on substantive grounds as well.

Finally, we understand that Ohio Ordnance Works disputes that it was a federal contractor at the time of the contribution. If the Commission determines that the company was a federal contractor covered by the ban, Club Action will refund the contribution.

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Best regards,

A handwritten signature in blue ink that reads "Carol A. Laham". The signature is written in a cursive style.

Carol A. Laham  
Andrew G. Woodson

Enclosures



*Fighting & Winning FOR*  
**ECONOMIC CHAMPIONS**

Attachment A

**SUPPORT**

NAME OHIO ORDNANCE WORKS, INC  
 ADDRESS PO BOX 687  
 CITY, STATE ZIP CHARDON, OH 44024  
 PHONE (440) 285-3481  
 EMAIL AP@OOWINC.COM  
 \* OCCUPATION MANUFACTURING \*EMPLOYER OHIO ORDNANCE WORK, INC

**DONATION INFORMATION**

**CLUB FOR GROWTH ACTION** \$ 100,000.00

There is no legal limitation on the amount you may contribute to Club for Growth Action.

Please check this box if you are making a corporate contribution.

To contribute by check, please make your personal or corporate check payable to  
**"Club for Growth Action"** and return to the address below.

If you have any questions or require additional information please call Marissa Akers at 202.955.5500

**CREDIT CARD INFORMATION**

Please check this box to make your contribution a monthly recurring contribution.

Visa  MasterCard  AmericanExpress  Discover

Card Number \_\_\_\_\_ Expiration date \_\_\_\_\_

Name on Card \_\_\_\_\_ CVV/Sec. code \_\_\_\_\_

Signature \_\_\_\_\_

**WIRE TRANSFER INFORMATION**

**Bank:** Sun Trust Bank

**Bank Address:** 1445 New York Ave. NW  
 Washington, DC 20005

**Routing:** \_\_\_\_\_

**Account:** \_\_\_\_\_

**Account Name:** Club for Growth Action

Contributions to Club for Growth Action are not tax deductible. Contributions from foreign nationals (non-Green Card holders), government contractors and national banks are prohibited. Club for Growth Action is an independent expenditure committee established by the Club for Growth. Your contribution to Club for Growth Action affirms your membership in the Club for Growth.

\* Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation, and employer of individuals whose contributions exceed \$200 in a calendar year.

2001 L Street NW, Suite 600, Washington, DC 20036 | Phone 202.955.5500 | Fax 202.955.9466 | [www.clubforgrowthaction.org](http://www.clubforgrowthaction.org)

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