

FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

June 14, 2023

1 2 **MEMORANDUM** 3 4 TO: The Commission 5 6 FROM: Lisa J. Stevenson 7 Acting General Counsel 8 9 Charles Kitcher Associate General Counsel for Enforcement 10 11 Claudio Pavia 12 Deputy Associate General Counsel for Enforcement 13 14 Mark Allen MA BY: 15 **Assistant General Counsel** 16 17 MUR 8021 (Ohio Ordnance Works, Inc.) 18 **SUBJECT:** 19 Recommendation to Accept Signed Conciliation Agreement 20

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On April 18, 2023, the Commission found reason to believe that Ohio Ordnance Works, Inc. ("Ohio Ordnance") violated 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making a prohibited federal contractor contribution to Club for Growth Action ("Club Action"), authorized pre-probable cause conciliation and approved a conciliation offer to Ohio Ordnance. We recommend that the Commission approve the attached negotiated signed agreement.²

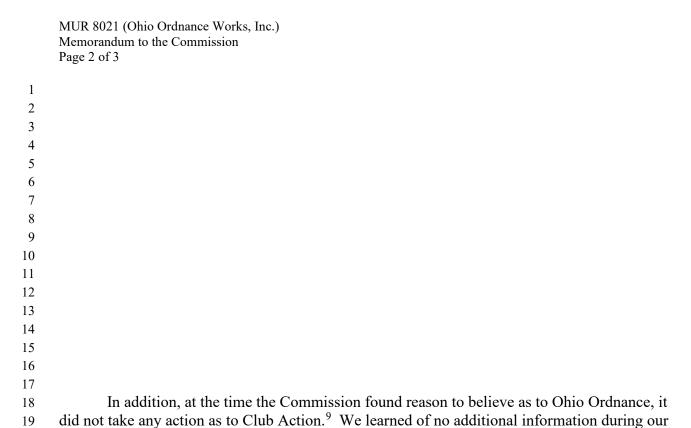
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See Certification ("Cert."), MUR 8021 (Apr. 20, 2023); Factual and Legal Analysis at 9, MUR 8021 (Ohio Ordnance).

Attach. 1 (signed agreement); Attach. 2 (redline of changes from the Commission's opening offer).

MUR802100063



The Commission divided 2-4 on a motion including taking no action at that time as to Club Action and divided 3-3 on a motion to find no reason to believe that Club Action violated 52 U.S.C. § 30119(a)(2) and 11 C.F.R. § 115.2(c). *See* Cert. ¶¶ 1.c, 2, MUR 8021 (Apr. 20, 2023).

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1	conciliation negotiations that would indicate that Club Action knowingly solicited the federal
2	contractor contribution. Therefore, we now recommend that the Commission find no reason to
3	believe that Club Action and Adam Rozansky in his official capacity as treasurer violated
4	52 U.S.C. § 30119(a)(2) and 11 C.F.R. § 115.2(c) and close the file. 10

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RECOMMENDATIONS:

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1. Accept the signed conciliation agreement with Ohio Ordnance Works, Inc.;

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2. Find no reason to believe that Club for Growth Action and Adam Rozansky in his official capacity as treasurer violated 52 U.S.C. § 30119(a)(2) and 11 C.F.R. § 115.2(c) by knowingly soliciting a federal contractor contribution;

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3. Approve the appropriate letters; and

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4. Close the file.

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See MUR 8010 (Medical Place, Inc.) (after pre-probable cause conciliation with a federal contractor contributor, the Commission found no reason to believe recipient committee violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(c) by knowingly soliciting a federal contractor contribution).