



**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

June 14, 2023

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2 **MEMORANDUM**

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4 **TO:** The Commission  
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6 **FROM:** Lisa J. Stevenson  
7 Acting General Counsel  
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9 Charles Kitcher  
10 Associate General Counsel for Enforcement  
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12 Claudio Pavia  
13 Deputy Associate General Counsel for Enforcement  
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15 **BY:** Mark Allen *MA*  
16 Assistant General Counsel  
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18 **SUBJECT:** MUR 8021 (Ohio Ordnance Works, Inc.)  
19 Recommendation to Accept Signed Conciliation Agreement  
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22 On April 18, 2023, the Commission found reason to believe that Ohio Ordnance Works,  
23 Inc. (“Ohio Ordnance”) violated 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making a  
24 prohibited federal contractor contribution to Club for Growth Action (“Club Action”), authorized  
25 pre-probable cause conciliation and approved a conciliation offer to Ohio Ordnance.<sup>1</sup> We  
26 recommend that the Commission approve the attached negotiated signed agreement.<sup>2</sup>  
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<sup>1</sup> See Certification (“Cert.”), MUR 8021 (Apr. 20, 2023); Factual and Legal Analysis at 9, MUR 8021 (Ohio Ordnance).

<sup>2</sup> Attach. 1 (signed agreement); Attach. 2 (redline of changes from the Commission’s opening offer).

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In addition, at the time the Commission found reason to believe as to Ohio Ordnance, it did not take any action as to Club Action.<sup>9</sup> We learned of no additional information during our

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<sup>9</sup> 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.<sup>10</sup>  
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6 **RECOMMENDATIONS:**

- 7 1. Accept the signed conciliation agreement with Ohio Ordnance Works, Inc.;
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- 9 2. Find no reason to believe that Club for Growth Action and Adam Rozansky in his  
10 official capacity as treasurer violated 52 U.S.C. § 30119(a)(2) and 11 C.F.R.  
11 § 115.2(c) by knowingly soliciting a federal contractor contribution;  
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- 13 3. Approve the appropriate letters; and
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- 15 4. Close the file.  
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<sup>10</sup> 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).